



2022 PROVIDER MANUAL



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EL PASO INTEGRAL CARE OVERVIEW

The Independent Physicians Association (IPA) is a physician run organization with local groups of primary care physicians and sub-specialists. The goal is to develop a managed health care delivery system in which the IPA accepts responsibility for a wide range of medical services, including primary care, specialty care, and diagnostic procedures.

The objective of the IPA is to create a primary care physician (PCP) driven delivery system which allows the PCP to take full advantage of managed care marketing and to provide a steady flow of new patients. Each provider is grouped into a geographic area called a POD (Physician Organized Delivery System) centralized around a group of hospitals with set PCP and Specialist networks.

This manual contains an overview of the general health plan details as they relate to the day-to-day contact of the participating physicians with the member and the IPA. The IPA encourages continual communication between the physicians and the IPA office to ensure a consistent working relationship. You will receive updates to this manual as changes to the policies or procedures occur.

A Board of Directors governs each IPA. The boards of directors are comprised of local physicians, a consultant, and a Physicians Association, El Paso Integral Care is appreciated.

EL PASO INTEGRAL CARE (EPIC)

The environment of medicine and the needs of patients and physicians are changing. At EPIC, we stand committed to face these changes with will, vision, and execution.

STRATEGIC PLAN

To recognize change, promote our vision, and help us move forward into the future as the premier IPA advocating for patients and physicians in El Paso and throughout Texas.

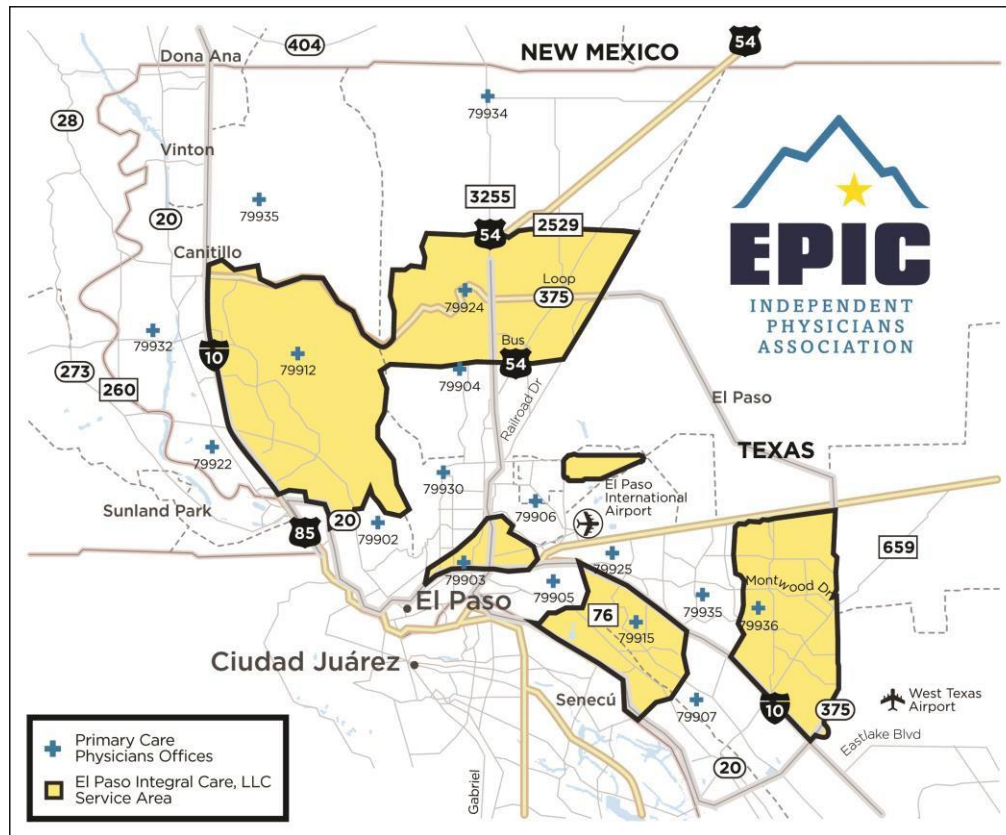
MISSION

To provide health care excellence to our patients by utilizing our medical skills to lessen the afflictions common to mankind, provide compassionate care, and restore health and vitality.

VISION

To advocate for the distinctiveness of our philosophy and principles so that we may continue to be a leader in quality health care delivery as the premier IPA company in the great State of Texas.

Service Area Map



PHYSICIAN RIGHTS AND RESPONSIBILITIES

Physician Rights:

- IPA encourages your feedback and suggestions on how service may be improved within the organization.
- If an acceptable patient-physician relationship cannot be established with an IPA patient who has selected you as his/her Primary Care Physician, you may request that IPA have that patient removed from your care.
- You may request claims reconsideration on any claims submissions in which you feel are not paid according to payment policy.
- You may request an appeal on any claims submission in which you feel are not paid in keeping with the level of care rendered or clinical guidelines.
- You may request to discuss any referral request with the Medical Director or Chief Medical Officer after various times in the review process, before a decision is rendered or after a decision is rendered

Physician Responsibilities:

- You have agreed to treat all IPA patients the same as all other patients in your practice, regardless of the type or amount of reimbursement.
- Primary Care Physicians must provide continuous 24 hours, 7 days a week access to care for Health Plan patients. During periods of unavailability or absence from the practice, you must arrange coverage for your members. Please notify the IPA of the physician who is providing coverage for your practice.
- Primary Care Physicians shall use best efforts to provide patient care to new patients within three (3) months of enrollment with IPA.
- Primary Care Physicians shall use best efforts to provide follow-up patient care to patients that have been in the hospital setting within three 3 days of hospital discharge.
- Primary Care Physicians are responsible for the coordination of routine preventive care along with any ancillary services that need to be rendered with authorization.
- All providers are required to code to the highest level of specificity necessary to describe a patient's acuity level. All coding should be conducted in accordance with CMS guidelines and all applicable state and federal laws.
- All providers are required to actively promote and participate in all quality initiatives inclusive of any and all chart audits, patient preventive care, and patient satisfaction activities.
- Specialists must provide specialty services upon referral from the Primary Care Physician and work closely with the referring physician regarding the treatment the patient is to receive. Specialists must also provide continuous 24 hour, 7 days a week access to care for patients.
- Specialists are required to coordinate the referral process (i.e. obtain authorizations) for further care that they recommend. This responsibility does not revert back to the Primary Care Physician while the care of the patient is under the direction of the Specialist.
- In the event you are temporarily unavailable or unable to provide patient care or

referral services to an IPA patient, you must arrange for another IPA physician to provide such services on your behalf. This coverage cannot be provided by an Emergency Room. For capitated physicians, the covering physician must agree to seek payment for services rendered to your patients from you only, but submit an encounter to the IPA with proper notation for covering services.

- You have agreed to treat Participating Health Plan's patients the same as all other patients in your practice, regardless of the type or amount of reimbursement.
- You have agreed to provide continuing care to participating patients.
- You have agreed to utilize IPA participating physicians/facilities when services are available and can meet your patient's needs. Approval prior to referring outside of the contracted network of providers may be required.
- You have agreed to participate in IPA's peer review activities as they relate to the Quality Management/Utilization Review program.
- You have agreed to allow IPA Inpatient Managers to follow your patients in the hospital and other inpatient settings.
- You may not balance bill a patient for providing services that are covered by IPA. This excludes the collection of standard copays. You may bill a patient for a procedure that is not a covered benefit if you have followed the appropriate procedures outlined in the "Claims" section of this manual.
- You have agreed to provide the IPA Encounter Data for all services outlined in the "Encounter Data" section of this manual. Such data must be received within 95 days from the date of service. Any data received after 95 days will not be included in true-up or any other financial calculations.
- All claims must be received within 95 days from the date of service or the timeframe specified in your contract.
- Adoption and usage of portals and software applications available to physicians for quality and cost management as well as care coordination.

Patient Assignment to New PCP

IPA Providers have a limited right to request a customer be assigned to a new Primary Care Physician. Such requests cannot be based solely on the filing of a grievance, appeal or the request for a secondary review or other action by the customer. A provider may request to have a customer moved to the care of another provider due to the following behaviors:

- Fraudulent use of services or benefits.
- The customer is disruptive, unruly, threatening, or uncooperative to the extent that customer seriously impairs Cigna's or the provider's ability to provide services to the customer or to obtain new customers and the aforementioned behavior is not caused by a physical or Behavioral Health condition.
- Threats of physical harm to a provider and/or office staff.
- Non-payment of required copayment for services rendered.
- Receipt of prescription medications or health services in a quantity or manner which is not medically beneficial or not medically necessary.
- Repeated refusal to comply with office procedures essential to the functioning of the provider's practice or to accessing benefits under the managed care plan.

- The customer steadfastly refuses to comply with managed care restrictions (e.g., repeatedly using the emergency room in combination with refusing to allow the managed care organization to coordinate treatment of the underlying medical condition).
- Other behavior, which results in serious disruption of the customer/physician relationship.
- An IPA provider cannot request a disenrollment based on adverse change in a customer's health status or utilization of services medically necessary for treatment of a customer's condition. The provider should make reasonable efforts to address the customer's behavior, which has an adverse impact on the customer/physician relationship, through education and counseling, and if medically indicated, coordination with appropriate Specialists. If the customer's behavior cannot be remedied through reasonable efforts, and the PCP feels the relationship has been irreparably harmed, the PCP must follow the procedure below to have the patient transferred.

Procedure

- Once the physician has determined that the physician/customer relationship has been irreparably harmed, the physician should submit the completed Physician Requests Transfer of Member From Panel form to their IPA Medical Director and provide details and documentation to support their decision. Provider customer service should be notified once a decision has been made.
 - The physician is required to send the customer a notice informing the customer of their decision to terminate the physician/customer relationship. The notice must be sent to the customer at least 30 calendar days in advance of discharging customer from a practice. Notification must be in writing, by certified mail, and the IPA must be copied on the letter sent to the patient
- Except in the event of immediate threat or physical harm to physician, care team or staff, the physician is required to continue customer care for at least 30-45 days or longer to allow the customer time to select and be assigned a new PCP.
- The physician will transfer, at no cost, a copy of the medical records of the customer to the new PCP and will cooperate with the customer's new PCP in regard to transitioning care and providing information regarding the customer's care needs.
- A customer may also request a change in PCP for any reason. The PCP change that is requested by the customer will be effective the first (1st) of the month following the receipt of the request, unless circumstances require an immediate change.

PHYSICIAN REQUESTS TRANSFER OF MEMBER FROM PANEL

Physician Name: _____ POD: _____

The member referenced below is not following the accepted standards set by our office in order to maintain an effective treatment plan or a satisfactory patient/physician relationship. The information below is provided so that the Health Plan can notify the member of such termination request advising his/her to select a new Primary Care Physician.

MEMBER NAME: _____ ID# _____

HEALTH PLAN: Renaissance Physicians (RP)

This member has displayed the following behavior:

- ___ Fraudulent use of services or benefits.
- ___ Threats of physical harm to a physician or his or her office staff.
- ___ Non-payment of required co-payment for services rendered.
- ___ Receipt of prescription medications or health services in a quantity or manner which is not medically beneficial or not medically necessary.
- ___ Refusal to accept a treatment or procedure recommended by the physician, if such refusal is incompatible with the continuation of the patient/physician relationship. The physician should also indicate if he or she believes that no professionally acceptable alternative treatment or procedure exists.
- ___ Repeated refusal to comply with office procedures essential to the functioning of the physician's practice or to accessing benefits under the managed care plan.
- ___ Other behavior which has resulted in serious disruption of the patient/physician relationship.

COMMENTS TO SUBSTANTIATE THE ABOVE BEHAVIOR:

DATE(S) MEMBER WAS COUNSELED/EDUCATED: _____

SUPPORTING DOCUMENTATION MUST BE ATTACHED TO SUBSTANTIATE THAT THE MEMBER WAS COUNSELED/EDUCATED ON THE ISSUES DESCRIBED ABOVE. (i.e., medical records, chart notes, incident reports, that documents the member was called and reminded of the appointment; documentation of no shows; documentation of recommended treatment plan, counseled, etc.)

The above member has been counseled and educated and there has not been any improvement or progress. It is necessary for this member to be removed from my panel and to seek medical services elsewhere. I will continue to provide treatment for 30-45 days to allow the Health Plan to assist the member in the selection of another PCP.

SIGNATURE OF REQUESTING PCP: _____

TYPE OR PRINT NAME: _____

DATE: _____

Closing Patient Panels

When a participating Primary Care Physician elects to stop accepting new patients, the provider's patient panel is considered closed. If a participating Primary Care Physician closes his or her patient panel, the decision to stop accepting new patients must apply to all patients regardless of insurance coverage. Providers may not discriminate against patients by closing their patient panels for IPA's patients only, nor may they discriminate among patients by closing their panel to certain product lines. Providers who decide that they will no longer accept any new patients must notify the Network Management Department, in writing, at least 60 days before the date on which the patient panel will be closed or the time frame specified in your contract.

Medical Record Standards

The IPA requires the following items in patient medical records:

- Identifying information of the patient.
- Identification of all providers participating in the patient's care and information on services furnished by these providers.
- A problem list, including significant illnesses and medical and psychological conditions.
- Presenting complaints, diagnoses, and treatment plans.
- Prescribed medications, including dosages and dates of initial or refill prescriptions.
- Information on allergies and adverse reactions (or a notation that the patient has no known allergies or history of adverse reactions).
- Information on advanced directives.
- Past medical history, physical examinations, necessary treatments, and possible risk factors for the patient relevant to the particular treatment.

Note: Unless otherwise specifically stated in your provider services agreement. Medical records shall be provided at no cost to IPA and IPA patients.

Access and Availability Standards for Providers

- A Primary Care Physician (PCP) must have their primary office open to receive patients at least 20 hours per week.
- The PCP must ensure that coverage is available 24 hours a day, seven days a week.
- PCP offices must be able to schedule appointments for patients at least two (2) months in advance of the appointment.
- A PCP must arrange for coverage during absences with another participating provider in an appropriate specialty, which is documented on the Provider Application and agreed upon in the Provider Agreement.

Primary Care Access Standards

Appointment Type	Access Standard
Urgent	Immediately
Non-Urgent/Non-Emergent	Within one (1) week
Routine and Preventive	Within 30 Business Days
On-Call Response (After Hours)	Within 30 minutes for emergency
Waiting Time in Office	30 minutes or less

Specialist Access Standards

Appointment Type	Access Standard
Urgent	Immediately
Non-Urgent/Non-Emergent	Within one (1) week
Elective	Within 30 days
High Index of Suspicion of Malignancy	Less than seven (7) days
Waiting time in office	30 minutes or less

Behavioral Health Access Standards

Appointment Type	Access Standard
Emergency	Within 6 hours of the referral
Urgent/Symptomatic	Within 48 hours of the referral
Routine	Within ten (10) business days of the referral*

After-hours Access Standards

All participating providers must return telephone calls related to medical issues. Emergency calls must be returned within 30 minutes of the receipt of the telephone call. Non-emergency calls should be returned within a 24-hour time period. A reliable 24 hours a day/7 days a week answering service with a beeper or paging system and on-call coverage arranged with another participating provider of the same specialty is preferred.

Plan Notification Requirements for Providers

Participating providers must provide written notice to the IPA no less than 60 days in advance of any changes to their practice or, if advance notice is not possible, as soon as possible thereafter.

The following is a list of changes that must be reported to by contacting Provider Customer Service:

- Practice address
- Billing address
- Fax or telephone number

- Hospital affiliations
- Practice name
- Providers joining or leaving the practice (including retirement or death)
- Provider taking a leave of absence
- Practice mergers and/or acquisitions
- Adding or closing a practice location
- Tax Identification Number (please include W-9 form)
- NPI number changes and additions
- Changes in practice office hours, practice limitations, or gender limitations

By providing this information in a timely manner, you will ensure that your practice is listed correctly in the Provider Directory.

Please note: Failure to provide up to date and correct information regarding demographic information regarding your practice and the physicians that participate may result in the denial of claims for you and your physicians.

Provision of Health Care Services

Participating providers shall provide health care services to all patients, consistent with the benefits covered in their policy, without regard to race, ethnicity, national origin, religion, sex, age, mental or physical disability or medical condition, sexual orientation, claims experience, medical history, evidence of insurability (including conditions arising out of acts of domestic violence), genetic information, source of payment, or any other bases deemed unlawful under federal, state, or local law.

Participating providers shall provide covered services in a culturally competent manner to all patients by making a particular effort to ensure those with limited English proficiency or reading skills, diverse cultural and ethnic backgrounds, and physical or mental disabilities receive the health care to which they are entitled. Examples of how a provider can meet these requirements include but are not limited to: translator services, interpreter services, teletypewriters or TTY (text telephone or teletypewriter phone) connection.

IPA offers interpreter services and other accommodations for the hearing-impaired. Translator services are made available for non-English speaking or Limited English Proficient (LEP) patients. Providers can call IPA customer service at 832-553-3300 to assist with translator to TTY services if these services are not available in their office location.

PROVIDER INFORMATION

The IPA recognizes Family Medicine, General Practice, Geriatric Medicine, and Internal Medicine physicians as Primary Care Physicians (PCPs). Any employed mid-level practitioners rendering services must be listed on contracts and will not be assigned patients but will have data aggregated at their level for purposes of reporting.

The IPA may recognize Infectious Disease Physicians as PCPs for patients who may require a specialized physician to manage their specific health care needs. All contracted credentialed providers participating with IPA are listed in the region-appropriate Provider Directory, which is provided to patients and made available to the public.

The Role of the Primary Care Physician (PCP)

Each patient must select an IPA Participating Primary Care Physician (PCP) at the time of enrollment. The PCP is responsible for managing all the health care needs of patients as follows:

- Manage the health care needs of patients who have chosen the physician as their PCP.
- Schedule new patient's initial visit with physician within 90 days of enrollment,
- On the patient's first visit to the provider office, patient should be seen by the Physician. On subsequent visits the physician is to be available for questions at all scheduled visits when supervising a PA or NP and to review all coding and quality initiatives before submission to ensure accuracy and appropriateness.
- Abide by CMS guidelines and regulations.
- Ensure that patients receive treatment as frequently as is necessary based on the patient's condition.
- Develop an individual treatment plan for each patient.

Inpatient Manager Program

- IPA requires that in certain IPA PODs, patients admitted to participating health care facilities should be assigned to the designated Inpatient Manager (IPM) for coordination of care throughout the entire stay. Health care facilities will receive notice of the designated Inpatient Manager and are required to follow the proper protocol of assigning patients to the designated Inpatient Manager.

Providers Designated as Primary Care Physicians (PCPs)

- Submit accurately and timely claims and encounter information for clinical care coordination.
- Comply with pre-authorization procedures.
- Refer patients to designated IPA participating providers.
- Comply with Quality Management and Utilization Management programs.
- Participate in IPA directed Coding and Quality Initiatives.
- Use appropriate IPA designated ancillary and facility providers.
- Comply with emergency care procedures.
- Comply with access and availability standards as outlined in this manual,

- including after-hours care.
- Bill on the CMS 1500 claim form, preferably electronically, in accordance with billing procedures.
- Ensure that, when billing for services provided, coding is specific enough to capture the acuity and complexity of a patient's condition and ensure that the codes submitted are supported by proper documentation in the medical record.
- Comply with IPA Preventive Screening and Clinical Guidelines.
- Adhere to medical record standards as outlined in this manual.

The Role of the Specialist Physician

Each patient is entitled to see a Specialist Physician for certain services required for treatment of a given health condition. The Specialist Physician is responsible for the following:

- Provide specialty health care services to patients as needed.
- Collaborate with the patient's Primary Care Physician to enhance continuity of health care and appropriate treatment.
- Provide consultative and follow-up reports to the referring physician within 72 hours of encounter.
- Comply with access and availability standards as outlined in this manual including after-hours care.
- Comply with pre-authorization and referral process.
- Comply with Quality Management and Utilization Management programs.
- Bill on the CMS 1500 claim form in accordance with billing procedures.
- Ensure that, when billing for services provided, coding is specific enough to capture the acuity and complexity of a patient's condition and ensure that the codes submitted are supported by proper documentation in the medical record.
- Refer patients to designated IPA participating providers.
- Use appropriate IPA designated ancillary and facility providers.
- Submit encounter information accurately and timely.
- Adhere to medical record standards as outlined in this manual.

Administrative, Medical, and Reimbursement Policy Changes

From time to time, the IPA may amend, alter, or clarify its policies. Examples of this include, but are not limited to, regulatory changes, changes in medical standards, and modification of Covered Services. Specific IPA policies and procedures may be obtained by calling our Provider Services Department at **1-832-553-3300**.

The IPA's will communicate changes to the Provider Manual using a variety of methods including but not limited to:

- Annual Provider Manual Updates
- Letter
- Email
- Provider Newsletters

Providers are responsible for the review and inclusion of policy updates in the Provider

Manual and for complying with these changes upon receipt of these notices.

Communication Among Providers

- The PCP should provide the Specialist Physician with relevant clinical information regarding the patient's care at the time of referral
- The Specialist Physician must provide the PCP with information about his/her visit with the patient within 72 hours of encounter.
- The PCP must document in the patient's medical record his/her review of any reports, labs, or diagnostic tests received from a Specialist Physician.

Provider Marketing Guidelines

The general guidelines assist IPA providers who have contracted with multiple Medicare Advantage plans and accept Medicare FFS patients determine what marketing and patient outreach activities are permissible under the CMS guidelines. CMS has advised Medicare Advantage plans to prohibit providers from steering, or attempting to steer an undecided potential enrollee toward a specific health plan, or limited number of health plans, offered either by the health plan sponsor or another sponsor, based on the financial interest of the provider or agent. Providers should remain neutral parties in assisting health plans to market to beneficiaries or assisting in enrollment decisions.

Provider Can:

- Mail/call their patient panel to invite patients to general IPA's sponsored educational events to learn about the Medicare and/or Medicare Advantage program. This is not a sales/marketing meeting. No sales representative or health plan materials can be distributed. Sales representative cards can be provided upon request.
- Mail an affiliation letter one time to patients listing only IPA.
- Have additional mailings (unlimited) to patients about participation status but must list all participating Medicare Advantage plans and cannot steer towards a specific health plan. This letter may not quote specific health plan benefits without prior CMS approval and the agreement of all health plans listed.
- Notify patients in a letter of a decision to participate in an IPA's sponsored programs.
- Utilize a physician/patient newsletter to communicate information to patients on a variety of subjects. This newsletter can have an IPA corner to advise patients of IPA's information.
- Provide objective information to patients on specific health plan formularies, based on a patient's medications and health care needs.
- Refer patients to other sources of information, such as the State Health Insurance Assistance Program (SHIP), IPA's marketing representatives, state Medicaid, or **1-800-Medicare** to assist the patient in learning about the health plan and making a health care enrollment decision.
- Notify patients of a physician's decision to participate exclusively with an IPA for Medicare Advantage or to close panel to original Medicare FFS if appropriate.
- Record messages on our auto dialer to existing IPA's patients as long as the

message is not sales related or could be construed as steerage. IPA's Legal /Government programs must review the script.

- Have staff dressed in clothing with the Participating IPA logo.
- Display promotions items with the IPA logo.
- Providers are permitted to make available or distribute plan marketing materials, excluding application forms, as long as the provider agrees to do the same for all plan sponsors.

Provider Cannot:

- Quote specific health plan benefits or cost share in patient discussions.
- Urge or steer patient towards any specific health plan or selection of health plans.
- Collect enrollment applications in physician offices or at other functions.
- Offer inducements to persuade beneficiaries to enroll in a particular health plan or organization.
- Health Screen potential enrollees when distributing information to patients, as health screening is prohibited.
- Expect compensation directly or indirectly from the health plan for beneficiary enrollment activity.
- Call patients who are disenrolling from the health plan to encourage re-enrollment in a health plan.
- Mail notifications of health plan sales meetings to patients.
- Call patients to invite patients to sales, and marketing activity of a health plan.
- Display plan material within an exam room setting or while conducting a health screening

CREDENTIALING AND RE-CREDENTIALING PROGRAM

All practitioner and organizational applicants to the IPA must meet basic eligibility requirements and complete the credentialing process prior to becoming a participating provider. Once an application has been submitted, the provider is subject to a rigorous verification process that includes primary and secondary source verifications of all applicable information for the contracted specialty(s). Upon completion of the verification process, providers are subject to a peer review process whereby they are approved or denied participation with the. No provider can be assigned a health plan effective date or be included in a provider directory without undergoing the credentialing verification and peer review process. All providers who have been initially approved for participation are required to re-credential at least once every three years in order to maintain their participating status.

Practitioner Selection Criteria

The IPA utilizes specific selection criteria to ensure that practitioners who apply to participate meet basic credentialing and contracting standards. At minimum these include, but are not limited to:

- Holds appropriate, current and unencumbered licensure in the state of practice as required by state and federal entities.
- Holds a current, valid, and unrestricted federal DEA and state controlled substance certificate as applicable.
- Is board-certified or has completed appropriate and verifiable training in the requested practice specialty.
- Maintains current malpractice coverage with limits commensurate with the community standard in which practitioner practices.
- Participates in Medicare and has a Medicare number and/or a National Provider Identification number.
- Has not been excluded, suspended, and/or disqualified from participating in any Medicare, Medicaid, or any other government health related program.
- Is not currently opted out of Medicare.
- Has admitting privileges at a participating facility as applicable.

Credentialing and Re-credentialing Process

Once a practitioner has submitted an application for initial consideration, The IPA's Credentialing Department will conduct primary source verification of the applicant's licensure, education and/or board certification, privileges, lack of sanctions or other disciplinary action, and malpractice history by querying the National Practitioner Data Bank. The credentialing process generally takes up to ninety (90) days to complete, but can in some instances take longer. Once credentialing has been completed and the applicant has been approved, the practitioner will be notified in writing of their participation effective date.

To maintain participating status, all practitioners are required to re-credential at least every three (3) years. Information obtained during the initial credentialing process will

be updated and re-verified as required. Practitioners will be notified of the need to submit re-credentialing information at least 4 months in advance of their three-year anniversary date. Three (3) separate attempts will be made to obtain the required information via mail, fax, email, or telephonic request. Practitioners who fail to return re-credentialing information prior to their re-credentialing due date will be notified in writing of their termination from the network.

Organizational Provider Selection Criteria

When assessing organizational providers, the IPA utilizes the following criteria:

- Must be in good standing with all state and federal regulatory bodies.
- Has been reviewed and approved by an accrediting body.
- If not accredited, can provide appropriate evidence of successfully passing a recent state or Medicare site review, or meets other health plan criteria.
- Maintains current professional and general liability insurance as applicable.
- Has not been excluded, suspended, and/ or disqualified from participating in any Medicare, Medicaid, or any other government health related program.

Organizational Provider Application and Requirements

1. A completed Ancillary/Facility Credentialing Application with a signed and dated attestation.
2. If responded “Yes” to any disclosure question in the application, an appropriate explanation with sufficient details/information is required.
3. Copies of all applicable state and federal licenses (i.e. facility license, DEA, Pharmacy license, etc.).
4. Proof of current professional and general liability insurance as applicable.
5. Proof of Medicare participation.
6. If accredited, proof of current accreditation.
7. Note: Current accreditation status is required for DME, Prosthetic/Orthotics, and non-hospital based high tech radiology providers who perform MRIs, CTs and/or Nuclear/PET studies.
8. If not accredited, a copy of any state or CMS site surveys that occurred within the last three years including evidence that the organization successfully remediated any deficiencies identified during the survey.

Credentialing Committee and Peer Review Process

All initial applicants and re-credentialed providers are subject to a peer review process prior to approval or re-approval as a participating provider. The Medical Director may approve providers, who meet all of the acceptance criteria. Providers who do not meet established thresholds are presented to the Credentialing Committee for consideration. The Credentialing Committee is comprised of contracted primary care and specialty providers, and has the authority to approve or deny an appointment status to a provider. All information considered in the credentialing and re-credentialing process must be obtained and verified within one hundred eighty (180) days prior to presentation to the Medical Director or the Credentialing Committee.

All providers must be credentialed and approved before being assigned a participating effective date.

Non-discrimination in the Decision-making Process

The IPA's credentialing program is compliant with all guidelines from the National Committee for Quality Assurance (NCQA), Centers for Medicare & Medicaid Services (CMS), and state regulations as applicable. Through the universal application of specific assessment criteria, ensures fair and impartial decision-making in the credentialing process, and does not make credentialing decisions based on an applicant's race, gender, age, ethnic origin, sexual orientation, or due to the type of patients or procedures in which the provider specializes.

Provider Notification

All initial applicants who successfully complete the credentialing process are notified in writing of their IPA effective date. Providers are advised not to see IPA's patients until they receive notification of their plan participation and effective date. Applicants who are denied by the Credentialing Committee will be notified via a certified letter within sixty (60) days of the decision outcome detailing the reasons for the denial/term and any appeal rights to which the provider may be entitled.

Appeals Process and Notification of Authorities

In the event that a provider's participation is limited, suspended, or terminated, the provider is notified in writing within sixty (60) days of the decision. Notification will include a) the reasons for the action, b) outline of the appeals process or options available to the provider, and c) the time limits for submitting an appeal. A panel of peers will review all appeals. When termination or suspension is the result of quality deficiencies, the appropriate state and federal authorities, including the National Practitioner Data Bank (NPDB) are notified of the action.

Confidentiality of Credentialing Information

All information obtained during the credentialing and re-credentialing process is considered confidential and is handled and stored in a confidential and secure manner as required by law and regulatory agencies. Confidential practitioner credentialing and re-credentialing information will not be disclosed to any person or entity except with the written permission of the practitioner or as otherwise permitted or required by law.

Ongoing Monitoring

The IPA conducts routine, ongoing monitoring of license sanctions, Medicare/Medicaid sanctions, and the CMS Opt Out list between credentialing cycles. Participating providers who are identified as having been sanctioned, are the subject of a complaint review, or are under investigation for or have been convicted of fraud, waste, or abuse are subject to review by the Medical Director or the Credentialing Committee who may

elect to limit, restrict or terminate participation. Any provider who's license has been revoked or has been excluded, suspended, and/or disqualified from participating in any Medicare, Medicaid, or any other government health related program or who has opted out of Medicare will be automatically terminated from the IPA plan.

CONTRACT EXCLUSIONS

IPA retains the right to deliver certain services through a vendor or contractor. Should IPA elect to deliver certain services for which you are currently contracted to provide through a vendor or contractor, you will be provided a minimum of thirty (30) days advance notice and your contract terms will be honored during that notice period. After such time and notification, IPA retains the right to discontinue reimbursement for services provided by the vendor or contractor.

CLAIMS

Claims Submission

While IPA prefers electronic submission of claims, both electronic and paper claims are accepted. If interested in submitting claims electronically, contact Provider Customer Service at **1-832-553-3300** for assistance.

All completed claims forms should be forwarded to the address noted below:

El Paso Integral Care

Attn: Claims

PO Box 2888

Houston, TX 77252-2888

RP Professional Claims Electronic Payment ID Numbers:

- Availity - as payor ID for HCFA only
- Emdeon - 76066 - payor ID for HCFA and UB-04

Timely Filing

As an IPA provider, you have agreed to submit all claims within the time specified in your contract. Claims submitted with dates of service beyond the timeframe are not reimbursable.

Claim Format Standards

Standard CMS required data elements must be present for a claim to be considered a clean claim and can be found in the CMS Claims Processing Manuals. The link to the CMS Claims Processing Manuals is:

<https://www.cms.gov/manuals/downloads/clm104c12.pdf>

The IPA can only pay claims, which are submitted accurately. The provider is at all times responsible for an accurate claims submission. While IPA will make its best effort to inform the provider of claims errors, the claim accuracy rests solely with the provider.

Physicians in the same group practice who are in the same specialty must bill and be paid as though they were a single physician. If more than one service is provided on the same day to the same patient by the same physician or more than one physician in the same specialty in the same group, they must bill and be paid as though they were a single physician. For example, only one evaluation and management service may be reported unless the evaluation and management services are for unrelated problems.

Instead of billing separately, the physicians should select a level of service representative of the combined visits and submit the appropriate code for that level.

Physicians in the same group practice, but who are in different specialties may bill and be paid without regard to their patient in the same group.

Claim Payment

The IPA pays clean claims according to contractual requirements and the Centers for Medicare & Medicaid Services (CMS) guidelines. A clean claim is defined as a claim for a Covered Service that has no defect or impropriety. A defect or impropriety includes, without limitation, lack of data fields required by IPA or substantiating documentation, or a particular circumstance requiring special handling or treatment, which prevents timely payment from being made on the claim. The term shall be consistent with the Clean Claim definition set forth in applicable federal or state law, including lack of required substantiating documentation for non-participating providers and suppliers, or particular circumstances requiring special treatment that prevents timely payment from being made on the claim. If additional substantiating documentation involves a source outside of IPA, the claim is not considered clean.

Offsetting

As a contracted provider, you will be informed of any overpayments or other payments you may owe us within 365 days of the date on the Explanation of Benefits or within the timeframe as noted in your Agreement. You will have sixty (60) days from receipt of notification seeking recovery to refund us. We will provide you with the patient's name, patient's identification number, and claim number, your patient account number, date of service, a brief explanation of the recovery request, and the amount or the requested recovery. If you have not refunded us within the sixty (60) days recovery notice period, we will offset the recovery amounts identified in the initial notification, or in accordance with the terms of your Agreement.

Pricing

Original Medicare typically has market-adjusted prices by code (i.e. CPT or HCPCS) for services that Original Medicare covers. However, there are occasions where IPA offers a covered benefit for which Medicare has no pricing. In order to expedite claims processing and payment in these situations, the IPA will work to arrive at a fair market price by researching other external, publicly available pricing sources, such as other carriers, fiscal intermediaries, or state published schedules for Medicaid. The IPA requests that you make every effort to submit claims with standard coding. As described in this Manual and/or your Agreement, you retain your rights to submit a Request for Reconsideration if you feel the reimbursement was incorrect.

Claims Encounter Data

Providers who are being paid under capitation must submit claims in order to capture encounter data as required per your IPA's Provider Agreement.

Explanation of Payment (EOP)/Remittance Advice (RA)

The EOP/RA statement is sent to the provider after coverage and payment have been determined by IPA. The statement provides a detailed description of how the claim was processed.

Non Payment/Claim Denial

Any denials of coverage or non-payment for services by IPA will be addressed on the Explanation of Payment (EOP) or Remittance Advice (RA). An adjustment/denial code will be listed per each billed line if applicable. An explanation of all applicable adjustment codes per claim will be listed below that claim on the EOP/RA. Per your contract, the patient may or may not be billed for services denied by IPA. The patient may not be billed for a covered service when the provider has not followed the IPA's procedures. In some instances, providing the needed information may reverse the denial (i.e. authorization number, etc.). When no benefits are available for the patient, or the services are not covered, the EOP/RA will alert you to this and you may bill the patient.

Processing of Hospice Claims

When a Medicare Advantage (MA) patient elects hospice care, but chooses not to dis-enroll from the plan, the patient is entitled to continue to receive any MA benefits which are not responsibility of the hospice through the IPA. Under such circumstances the premium the IPA receives from CMS is adjusted to hospice status. As of the day the patient is certified as hospice, the financial responsibility for that patient shifts from IPA to Original Medicare.

During a hospice election, Original Medicare covers all Medicare-covered services rendered with cost-sharing of Original Medicare. IPA will remain financially responsible for any benefits above Original Medicare benefits that are non-hospice related. Non-Medicare covered services, such as vision eyewear allowable, prescription drug claims, and medical visit transportation will remain the responsibility of IPA. Plan cost-sharing will apply to IPA covered services. If the patient chooses original Medicare for coverage of covered, non-hospice-care, original Medicare services and also follows MA plan requirements, then, the patient pays plan cost-sharing and original Medicare pays the provider. IPA will pay the provider the difference between original Medicare cost-sharing and plan cost-sharing, if applicable. Plan rules must still be followed and apply for both professional and facility charges. An HMO patient who chooses to receive services out of network has not followed plan rules and therefore is responsible to pay FFS cost-sharing; A PPO patient who receives services out of network has followed plan rules and is only responsible for plan cost-sharing. The patient need not communicate to the plan in advance his/her choice of where services are obtained.

When a patient revokes hospice care, financial responsibility for Medicare-covered services will return to the health plan on the first of the month following the revocation. The following are the submission guidelines for Medicare Advantage patients enrolled in Hospice:

Hospice-Related Services

- Submit the claim directly to CMS.

- Medicare hospices bill the Medicare fee-for-service contractor for patients who have coverage through Medicare Advantage just as they do for patients, or beneficiaries, with fee-for-service coverage. Billing begins with a notice of election for an initial hospice benefit period, and followed by claims with types of bill 81X or 82X. If the patient later revokes election of the hospice benefit, a final claim indicating revocation, through use of occurrence code 42 should be submitted as soon as possible so the patient's medical care and payment is not disrupted.
- Medicare physicians may also bill the Medicare fee-for-service contractor for patients who have coverage through Medicare Advantage as long as all current requirements for billing for hospice beneficiaries are met. These claims should be submitted with a GV or GW modifier as applicable. Medicare contractors process these claims in accordance with regular claims processing rules. When these modifiers are used, contractors are instructed to use an override code to assure such claims have been reviewed and should be approved for payment by the Common Working File in Medicare claims processing systems.
- As specified above, by regulation, the duration of payment responsibility by fee-for-service contractors extends through the remainder of the month in which hospice is revoked. MA plan patients that have elected hospice may revoke hospice election at any time, but claims will continue to be paid by fee-for-service contractors as if the beneficiary were a fee-for-service beneficiary until the first day of the month following the month in which hospice was revoked.

Non-Hospice Services

- For Part A services not related to the patient's terminal condition, submit the claim to the fiscal intermediary using the condition code 07.
- For Part B services not related to the patient's terminal condition, submit the claim to the Medicare carrier with a "GW" modifier.
- For services rendered for the treatment and management of the terminal illness by a non-hospice employed attending physician, submit the claim to the fiscal Intermediary/ Medicare carrier with a "GV" modifier.

Additional & Supplemental Benefits

- Submit the claim to IPA. For additional detail on hospice coverage and payment guidelines, please refer to 42 CFR 422.320-Special Rules for Hospice Care. Section (C) outlines the Medicare payment rules for patients who have elected hospice coverage. The Medicare Managed Care Manual, Chapter 11, Sections 40.2 and 50, and the CMS Program Memorandum AB-03-049 also outline payment responsibility and billing requirements for hospice services. This documentation is also available online at the CMS website: www.cms.gov.

Dual Eligible Patients

Many of your patients may have an IPA as their primary insurance payer and Medicaid as their secondary payer. This will require you to coordinate the benefits of these "dual eligible" patients by determining whether the patient should be billed for the deductibles and copayments, or coinsurances associated with their benefit plan. Providers may not assess a QMB (Qualified Medicare Beneficiary) or QMB- Plus for copayments, coinsurances, and/or

deductibles.

Providers will accept as payment in full IPA's payment and will not seek additional payment from the state or dual eligible patients. Additional information concerning Medicaid provider participation is available at www.myrpo.com.

A patient's level of Medicaid eligibility can change due to their medical and financial needs. The IPA encourages you to verify patients' Medicaid eligibility when rendering services, which will help you determine if the patient owes a deductible or copay.

Medicaid eligibility can be obtained by using the Medicaid telephonic Eligibility Verification System. If you do not have access to the system, please contact your State Medicaid provider for additional information.

Please note: Each state varies in their decision to cover the cost-share for populations beyond QMB and QMB+.

Cost-sharing Chart.

Patient's Medicaid Plan	Patient's liability Patient owes deductibles and copayments associated with benefit plan	Medicaid provides benefits Patient not liable for deductibles and copayments associated with benefit plan
Medicaid (FBDE)	No	Yes
QMB Only	No	Yes
QMB+	No	Yes
SLMB	Yes	No
SLMB+	Yes	No

Patient's Medicaid Plan	Patient's liability Patient owes deductibles and copayments associated with benefit plan	Medicaid provides benefits Patient not liable for deductibles and copayments associated with benefit plan
QI-1	Yes	No
QDWI	Yes	No

Coordination of Benefits and Subrogation Guidelines

General Definitions

Coordination of Benefits (COB): is the process of determining and reconciling individual payor liability for reimbursement when a patient is eligible for benefits coverage under more than one insurance company or other payor type (e.g., Medicare, Medicaid). Terms and conditions within the Summary of Benefits for each plan will generally dictate which payor is primary or secondary and any mathematical formula associated for calculating each payor's portion of coverage. Coordinating payment of these plans will provide benefit coverage up to but not exceeding one hundred (100) percent of the allowable amount. The respective primary and secondary payment obligations of the two coverages are determined by the Order of Benefits Determination Rule contained in the National Association of Insurance Commissioners (NAIC) COB Model Regulations Guidelines.

Order of Benefit Determination Rule: Rules which, when applied to a particular patient covered by at least two plans, determine the order of responsibility each plan has with respect to the other plan in providing benefits for that patient. A plan will be determined to have Primary or Secondary responsibility for a person's coverage with respect to other plans by applying the NAIC rules.

Primary: This carrier is responsible for costs of services provided up to the benefit limit for the coverage or as if no other, coverage exists.

Secondary: This carrier is responsible for the total allowable charges, up to the benefit limit for the coverage less the primary payment not to exceed the total amount billed (maintenance of benefits).

Allowable Expense: Any expense customary or necessary, for health care services provided as well as covered by the patient's health care plan.

Conclusion: COB is applying the NAIC rules to determine which plan is primarily responsible and plan would be in a secondary position when alternate coverage exists. If COB is to accomplish its purpose, all plans must adhere to the structure set forth in the Model COB regulations.

Basic NAIC Rules for COB

Birthday Rule

The primary coverage is determined by the birthday that falls earliest in the year, understanding both spouses are employed and have coverage. Only the day and month are taken into consideration. If both patients have the same date of birth, the plan which covered the patient the longest is considered primary.

General Rules

The following table contains general rules to follow to determine a primary carrier:

If the Patient/Beneficiary	The Below Conditions Exist	Then the Below Program Pays First	The Below Program Pays Secondary
Is age 65 or older, and is covered by a Group Health Plan (GHP) through current employment or a family patient's current employment	The employer has more than 20 employees, or at least one employer is a multi-employer group that employs 20 or more employees	The Group Health Plan (GHP) pays primary	IPA/Medicare pays secondary
Is age 65 or older and is covered a Group Health Plan (GHP) through current employment or a family patient's current employment	The employer has less than 20 employees	IPA /Medicare pays primary	Group Health Plan (GHP) pays secondary
Is entitled based on disability and is covered by a Large Group Health Plan (LGHP) through his/her current employment or through a family patient's current employment	The employer has 100 or more employees or at least one employer is a multi-employer group that employs 100 or more employees	The Large Group Health Plan (LGHP) pays primary	IPA /Medicare pays secondary
Is entitled based on disability and is covered by a Large Group Health Plan (LGHP) through his/her current employment or through a family patient's current employment	The employer employs less than 100 employees	IPA /Medicare pays primary	Large Group Health Plan (LGHP) pays secondary

Is age 65 or older or entitled based on disability and has retirement insurance only	Does not matter the number of employees	IPA /Medicare pays primary	Retirement Insurance pays secondary
Is age 65 or older or is entitled based on disability and has COBRA coverage	Does not matter the number of employees	IPA/Medicare pays primary	COBRA pays secondary
Becomes dually entitled based on age/ESRD	Had insurance prior to becoming dually entitled with ESRD as in block one above	The Group Health Plan (GHP) pays primary for the first 30 months	IPA/Medicare pays secondary (after 30 months IPA pays primary)
Becomes dually entitled based on age/ESRD but then retires and keeps retirement insurance	Had insurance prior to becoming dually entitled with ESRD as in block one above and then retired	The Retirement Insurance pays primary for the first 30 months	IPA/Medicare pays secondary (after 30 months IPA pays primary)

If the Patient/Beneficiary	The Below Conditions Exists	Then the Below Program Pays First	The Below Program Pays Secondary
Becomes dually entitled based on age/ESRD but obtains COBRA through employer	Had insurance prior to becoming dually with ESRD as in block above and picks up COBRA coverage	COBRA insurance pay primary for the months (or until the drops the COBRA coverage	IPA/Medicare pays (after 30 months IPA pays primary)
Becomes dually entitled on disability/ESRD	Had insurance prior to becoming dually with ESRD as in block three above	The Large Group Plan (LGHP) pays	IPA/Medicare pays (after 30 months IPA pays primary)
Becomes dually entitled on disability/ESRD but obtains COBRA through employer	Had insurance prior to becoming dually with ESRD as in block three above and picks the COBRA coverage	COBRA insurance pay primary for the months or until the drops the COBRA coverage	IPA/Medicare pays (after 30 months IPA pays primary)

Basic Processing Guidelines for COB

For the IPA to be responsible as either the primary or the secondary carrier, the patient must follow all HMO rules (i.e. pay copays and follow appropriate process).

When the IPA is the secondary insurance carrier:

- All IPA's guidelines must be met in order to reimburse the provider (i.e. pre-certification, etc.).
- The provider collects only the copayments required.
- Be sure to have the patient sign the "assignment of benefits" sections of the claim form.
- Once payment and/or EOB are received from the other carriers, submit another copy of the claim with the EOB of IPA for reimbursement. Be sure to note all authorization numbers on the claims and attach a copy of the referral form if applicable.

When the IPA is the primary insurance carrier:

- The provider collects the copayment required under the patient's plan.
- Submit the claim to the IPA first
- Be sure to have the patient sign the "assignment of benefits" sections of the claim form.
- Once payment and/or remittance advise (RA) has been received from IPA, submit a copy of the claim with the RA to the secondary carrier for adjudication.
- Please note that the IPA is a total replacement for Medicare.
- Medicare cannot be secondary when patients have an IPA.
- Medicaid will not pay the copay for the Participating Plan's patients.

Worker's Compensation

The IPA does not cover worker's compensation claims.

When a provider identifies medical treatment as related to an on-the-job illness or injury, the IPA must be notified. The provider will bill the worker's compensation carrier for all services rendered, not the IPA.

Subrogation

Subrogation is the coordination of benefits between a health insurer and a third party insurer (i.e. property and casualty insurer, automobile insurer, or worker's compensation carrier), not two health insurers. Claims involving Subrogation or Third Party Recovery (TPR) will be processed internally by the IPA's Claims Department. COB protocol, as mentioned above, would still apply in the filing of the claim.

Patients who may be covered by third party liability insurance should only be charged the required copayment. The bill can be submitted to the liability insurer. The provider should submit the claim to the IPA with any information regarding the third party carrier (i.e. auto insurance name, lawyers name, etc.). All claims will be processed per the usual claims procedures.

The IPA uses an outside vendor for review and investigation of all possible subrogation cases. This vendor coordinates all requests for information from the patient, provider and attorney's office and assists with settlements. For claims related questions, please contact Customer Service at 1-832-553-3300. A Provider Representative will gladly provide assistance.

Appeals

An appeal is a request for the IPA to review a previously made decision related to medical necessity, clinical guidelines, or prior authorization and referral requirements. You must receive a notice of denial, or remittance advice before you can submit an appeal. Refer to the Appeals section under Health Services for more information.

Reconsiderations

You have up to 180 days to request reconsideration of a claim. You may request claim reconsideration if you feel your claim was not processed appropriately according to the IPA's claim payment policy or in accordance with your provider agreement. A claim reconsideration request is appropriate for disputing denials such as coordination of benefits, timely filing, or missing information. Payment retractions, underpayments/overpayments, as well as coding disputes should also be addressed through the claim reconsideration process. The IPA will review your request, as well as your provider record, to determine whether your claim was paid correctly.

You may request reconsideration by submitting the completed request form to:

El Paso Integral Care
Attn: Reconsiderations
PO Box 2888
Houston, TX 77252-2888
Fax: 1-832-553-3418

PATIENT INFORMATION

Eligibility Verification

All participating providers are responsible for verifying a patient's eligibility at each and every visit. You can verify patient eligibility the following ways:

- Call the Health Plan – You must call the Health Plan to verify eligibility when the patient cannot present identification or does not appear on your monthly eligibility list. Please note: the Health Plan should have the most updated information, therefore, call the Health Plan for accuracy.
- HSConnect – Health Services' web portal, HSConnect, allows our providers to verify patient eligibility online
- Ask to see the patient's Identification Card – Each patient is provided with an individual patient identification card. Noted on the ID card is the patient's identification number, plan code, name of PCP, copayment, and effective date. Since changes do occur with eligibility, the card alone does not guarantee the patient is eligible.
- Pursue additional proof of identification – Each PCP is provided with a monthly Eligibility Report upon request, which lists new and current IPA's patients with their effective dates. Please be sure to refer to the most current month's Eligibility Report.
- See ID Cards in Health Plan sections.

Eligibility Guarantee Form

If your office decides to see a patient that does not have identification, you should have the patient sign an Eligibility Guarantee form. Please keep a copy of the signed form in patient's file. Please visit www.myrpo.com/providers/provider-resources for a copy of the form.

Maximum Out-of-Pocket (MOOP)

The Maximum Out-of-Pocket (MOOP) benefit is now a part of all benefit plans. Patients have a limit on the amount they will be required to pay out-of-pocket each year for medical services, which are covered under Medicare Part A and Part B. Once this Maximum Out-of-pocket expense has been reached, the patient no longer is responsible for any out-of-pocket expenses, including any cost shares, for the remainder of the year for covered Part A and Part B services (excluding the patient's Medicare Part B premium and the IPA's plan premium).

Patient Hold Harmless

Participating providers are prohibited from balance billing the IPA's patients including, but not limited to, situations involving non-payment by IPA, insolvency of IPA, or IPA's breach of its Agreement. Provider shall not bill, charge, collect a deposit from, seek compensation or reimbursement from, or have any recourse against patients or persons, other than the IPA, acting on behalf of patients for Covered Services provided pursuant to the Participating Provider's Agreement. The provider is not, however, prohibited from collecting copayments, coinsurances or deductibles for covered services in accordance with the terms of the applicable patient's Benefit Plan.

Patient Confidentiality

IPA knows that patients' privacy is extremely important to them, and we respect their right to privacy when it comes to their personal information and health care. We are committed to protecting our patients' personal information. IPA does not disclose patient information to anyone without obtaining consent from an authorized person(s), unless we are permitted to do so by law. Because you are a valued provider to the IPA, we want you to know the steps we have taken to protect the privacy of our patients. This includes how we gather and use their personal information. The privacy practices apply to all of IPA's past, present, and future patients.

When a patient joins a Medicare Advantage plan, the patient agrees to give IPA access to Protected Health Information. Protected Health Information ("PHI"), as defined by the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), is information created or received by a health care provider, health plan, employer or health care clearinghouse, that: (i) relates to the past, present, or future physical or behavioral health or condition of an individual, the provision of health care to the individual, or the past, present or future payment for provision of health care to the individual; (ii) identifies the individual, or with respect to which there is a reasonable basis to believe the information can be used to identify the individual; and (iii) is transmitted or maintained in an electronic medium, or in any form or medium. Access to PHI allows IPA to work with providers, like yourself, to decide whether a service is a Covered Service and pay your clean claims for Covered Services using the patients' medical records. Medical records and claims are generally used to review treatment and to do quality assurance activities. It also allows IPA to look at how care is delivered and carry out programs to improve the quality of care patients receive. This information also helps manage the treatment of diseases to improve our patients' quality of life.

Patients have additional rights over their health information.

They have the right to:

- Send IPA a written request to see or get a copy of information about them, or amend their personal information that they believe is incomplete or inaccurate. If we did not create the information, we will refer patient to the source of the information. Request that we communicate with them about medical matters using reasonable alternative means or at an alternative address, if communications to their home address could endanger them.
- Receive an accounting of IPA's disclosures of their medical information, except when those disclosures are for treatment, payment, or health care operations, or the law otherwise restricts the accounting.

As a Covered Entity under HIPAA, providers are required to comply with the HIPAA Privacy Rule and other applicable laws in order to protect patient PHI. To discuss any breaches of the privacy of our patients, please contact the CareAllies Privacy Steward at Patricia.Swan@CareAllies.com.

Patient Rights and Responsibilities

Patients have the following rights:

The right to be treated with dignity and respect

Patients have the right to be treated with dignity, respect, and fairness at all times. IPA must obey laws against discrimination that protect patients from unfair treatment. These laws say that IPA cannot discriminate against patients (treat patients unfairly) because of a person's race, disability, religion, gender, sexual orientation, health, ethnicity, creed, age, or national origin. If patients need help with communication, such as help from a language interpreter, they should be directed to call Customer Service. Customer Services can also help patients file complaints about access to facilities (such as wheelchair access). Patients can also call the U.S. Department of Health and Human Services' Office for Civil Rights at **1-800-368-1019** or TTY/TDD **1-800-537-7697**, or the Office for Civil Rights in their area for assistance.

The right to see participating providers, get covered services, and get prescriptions filled within a reasonable period of time

Patients will get most or all of their health care from participating providers, that is, from doctors and other health providers who are part of IPA. Patients have the right to choose a participating provider (IPA will work with patients to ensure they find physicians who are accepting new patients). Patients have the right to go to a women's health specialist (such as a gynecologist) without a referral. Patients have the right to timely access to their providers and to see specialists when care from a specialist is needed. Patients also have the right to timely access to their prescriptions at any network pharmacy. "Timely access" means that patients can get appointments and services within a reasonable amount of time. The Evidence of Coverage explains how patients access participating providers to get the care and services they need. It also explains their rights to get care for a medical emergency and urgently needed care.

The right to know treatment choices and participate in decisions about their health care

Patients have the right to get full information from their providers when they receive medical care, and the right to participate fully in treatment planning and decisions about their health care. Providers must explain things in a way that patients can understand. Patients have the right to know about all of the treatment choices that are recommended for their condition including all appropriate and medically necessary treatment options, no matter what their cost or whether they are covered by IPA. This includes the right to know about the different medication management treatment programs offers and those in which patients may participate.

Patients have the right to be told about any risks involved in their care.

Patients must be told in advance if any proposed medical care or treatment is part of a research experiment and be given the choice to refuse experimental treatments. Patients have the right to receive a detailed explanation from IPA if they believe that a health plan provider has denied care that they believe they are entitled to receive or care they believe they should continue to receive. In these cases, patients must request an initial decision. "Initial decisions" are discussed in the patients' Evidence of Coverage.

Patients have the right to refuse treatment.

This includes the right to leave a hospital or other medical facility, even if their doctor advises them not to leave. This also includes the right to stop taking their medication. If patients refuse treatment, they accept responsibility for what happens as a result of refusing treatment.

The right to use advance directives (such as a living will or a power of attorney)

Patients have the right to ask someone such as a family member or friend to help them with decisions about their health care. Sometimes, people become unable to make health care decisions for themselves due to accidents or serious illnesses. If a patient wants to, he/she can use a special form to give someone they trust the legal authority to make decisions for them if they ever become unable to make decisions for themselves. Patients also have the right to give their doctors written instructions about how they want them to handle their medical care if they become unable to make decisions for themselves. The legal documents that patients can use to give their directions in advance of these situations are called “advance directives.” There are different types of advance directives and different names for them. Documents called “living wills” and “powers of attorney for health care” are examples of advance directives.

If patients decide that they want to have an advance directive, there are several ways to get this type of legal form. Patients can get a form from their lawyer, from a social worker, from IPA, or from some office supply stores. Patients can sometimes get advance directive forms from organizations that give people information about Medicare. Regardless of where they get this form, keep in mind that it is a legal document. Patients should consider having a lawyer help them prepare it. It is important for the patient to sign this form and keep a copy at home. Patients should give a copy of the form to their doctor and to the person they name on the form as the one to make decisions for them if they cannot. Patients may want to give copies to close friends or family patients as well.

If patients know ahead of time that they are going to be hospitalized and they have signed an advance directive, they should take a copy with them to the hospital. If patients are admitted to the hospital, the hospital will ask them whether they have signed an advance directive form and whether they have it with them. If a patient has not signed an advance directive form or does not have a copy available during admission, the hospital has forms available and will ask if the patient wants to sign one.

Remember, it is a patient’s choice whether he/she wants to fill out an advance directive (including whether they want to sign one if they are in the hospital). According to law, no one can deny them care or discriminate against them based on whether or not they have signed an advance directive. If patients have signed an advance directive and they believe that a doctor or hospital has not followed the instructions, patients may file a complaint with their State Board of Medicine or appropriate state agency (this information can be found in the patient’s Evidence of Coverage).

The right to make complaints

Patients have the right to make a complaint if they have concerns or problems related to their coverage or care. Patients or an appointed/authorized representative may file “Appeals,” “grievances,” concerns and Coverage Determinations. If patients make a complaint or file an appeal or Coverage Determination, IPA must treat them fairly (i.e., not discriminate against them) because they made a complaint or filed an appeal or Coverage Determination. To obtain information relative to appeals, grievances, concerns and/or Coverage Determinations, patients should be directed to call Customer Service.

The right to get information about their health care coverage and cost

The Evidence of Coverage tells patients what medical services are covered and what they have to pay. If they need more information, they should be directed to call Customer Service. Patients have the right to an explanation from IPA about any bills they may get for services not covered by IPA. The IPA must tell patients in writing why IPA will not pay for or allow them to get a service and how they can file an appeal to ask IPA to change this decision. Staff should inform patients on how to file an appeal, if asked, and should direct patients to review their Evidence of Coverage for more information about filing an appeal.

The right to get information about IPA, health plan providers, drug coverage, and costs

Patients have the right to get information about the IPA and operations. This includes information about our financial condition, about the services we provide, and about our health care providers and their qualifications. Patients have the right to find out from us how we pay our doctors. To get any of this information, patients should be directed to call Customer Service. Patients have the right to get information from us about their Part D prescription coverage. This includes information about our financial condition and about our network pharmacies. To get any of this information, staff should direct patients to call Customer Service.

The right to get more information about patients’ rights

Patients have the right to receive information about their rights and responsibilities. If patients have questions or concerns about their rights and protections, they should be directed to call Customer Service. Patients can also get free help and information from their State Health Insurance Assistance Program (SHIP).

The right to take action if a patient thinks they have been treated unfairly or their rights are not being respected

- If patients think they have been treated unfairly or their rights have not been respected, there are options for what they can do.
- If patients think they have been treated unfairly due to their race, color, national origin, disability, age, sexual orientation, or religion, we must encourage them to let us know immediately. They can also call the Office for Civil Rights in their area.
- For any other kind of concern or problem related to their Medicare rights and protections described in this section, patients should be encouraged to call Customer Service.

Patients have the following responsibilities:

Along with certain rights, there are also responsibilities associated with being a patient of the IPA. Patients are responsible for the following:

- To become familiar with their IPA's coverage provider.
- To give their doctors and other providers the information they need to provide care for them and to follow the treatment plans and instructions that they and their doctors agree upon. Patients must be encouraged to ask questions of their doctors and other providers whenever the patient has them.
- To act in a way that supports the care given to other patients and helps the smooth running of their doctor's office, hospitals, and other offices.
- To pay their health plan premiums and any copayments or coinsurances they may have for the Covered Services they receive. Patients must also meet their other financial responsibilities that are described in their Evidence of Coverage.
- To let IPA know if they have any questions, concerns, problems, or suggestions regarding their rights, responsibilities, coverage, and/or IPA's operations.
- To notify Customer Service and their providers of any address and/or phone number changes as soon as possible.
- To use their IPA only to access services, medications and other benefits for themselves.

Benefits and Services

All patients receive benefits and services as defined in their Evidence of Coverage (EOC). Each month, the IPA makes available to each participating Primary Care Physician a list of their active patients. Along with the patient's demographic information, the list includes the name of the health plan in which the patient enrolled. Please be aware that recently terminated patients may appear on the list. (See "Eligibility Verification" section of this manual).

- The IPA encourages its patients to call their Primary Care Physician and the rules they must follow to get care as a patient. Patients can use their Evidence of Coverage and other information that we provide them to learn about their coverage, what we have to pay, and the rules they need to follow. Patients should always be encouraged to call Patient Services if they have any questions or complaints.
- To advise IPA if they have other insurance coverage.
- To notify providers when seeking care (unless it is an emergency) that they are enrolled with IPA and present their health plan enrollment card to schedule appointments. However, if an IPA's patient calls or comes to your office for an unscheduled non-emergent appointment, please attempt to accommodate the patient and explain to them your office policy regarding appointments. If this problem persists, please contact IPA.

Emergency Services and Care after Hours

Emergency Services

An emergency is defined as the sudden onset of a medical condition with acute symptoms. A patient may reasonably believe that the lack of immediate medical attention could result in:

- Permanently placing the patient's health in jeopardy
- Causing serious impairments to body functions

- Causing serious or permanent dysfunction of any body organ or part

In the event of a perceived emergency, patients have been instructed to first contact their Primary Care Physician for medical advice. However, if the situation is of such a nature that it is life threatening, or if they are unsure of the condition's severity, patients have been instructed to go immediately to the nearest emergency room facility. Patients who are unable to contact their PCP prior to receiving emergency treatment have been instructed to contact their PCP as soon as is medically possible or within forty-eight (48) hours after receiving care. The PCP will be responsible for providing and arranging any necessary follow-up services.

For emergency services within the service area, the PCP is responsible for providing, directing, or authorizing a patient's emergency care. The PCP or his/her designee must be available twenty-four (24) hours a day, seven (7) days a week to assist patients needing emergency services. The hospital may attempt to contact the PCP for direction. Patients have a copayment responsibility for outpatient emergency visits unless an admission results.

For emergency services outside the service area, IPA will pay reasonable charges for emergency services received from non-participating providers if a patient is injured or becomes ill while temporarily outside the service area. Patients may be responsible for a copayment for each incident of outpatient emergency services at a hospital's emergency room or urgent care facility.

Urgent Care Services

Urgent Care services are for the treatment of symptoms that are non-life threatening but that require immediate attention. The patient must first attempt to receive care from his/her PCP. IPA will cover treatment at a participating Urgent Care Center without a referral.

Continue or Follow-up Treatment

Continuing or follow-up treatment, except by the PCP, whether in or out of service area, is not covered by IPA unless specifically authorized or approved by IPA. Payment for covered benefits outside the service area is limited to medically necessary treatment required before the patient can reasonably be transported to a participating hospital or returned to the care of the PCP.

Excluded Services

In addition to any exclusion or limitations described in the patient's EOC, the following items and services are not covered under Original Medicare Plan or by IPA:

- Services that are not reasonable and necessary, according to the standards of the Original Medicare Plan.

- Experimental or investigational medical and surgical procedures, equipment, and medications, unless covered by the Original Medicare Plan or unless, for certain services, the procedures are covered under an approved clinical trial. The Centers for Medicare & Medicaid Services (CMS) will continue to pay through Original Medicare for clinical trial items and services covered under the September 2000 National Coverage Determination that are provided to health plan patients. Experimental procedures and items are those items and procedures determined the Original Medicare Plan to not be generally accepted by the medical community.
- Private room in a hospital, unless medically necessary.
- Private duty nurses.
- Personal convenience items, such as a telephone or television in a patient's room at a hospital or skilled nursing facility.
- Nursing care on a full-time basis in a patient's home.
- Custodial care unless it is provided in conjunction with covered skilled nursing care and/or skilled rehabilitation services. This includes care that helps
- people with activities of daily living like walking, getting in and out of bed, bathing, dressing, eating, using the bathroom, preparation of special diets, and supervision of medication that is usually self-administered.
- Homemaker services.
- Charges imposed by immediate relatives or patients of the patient's household.
- Meals delivered to the patient's home.
- Elective or voluntary enhancement procedures, services, supplies, and medications including but not limited to: weight loss, hair growth, sexual performance, athletic performance, cosmetic purposes, anti-aging, and mental performance unless medically necessary.
- Cosmetic surgery or procedures, unless needed because of accidental injury or to improve the function of a malformed part of the body. All stages of reconstruction are covered for a breast after a mastectomy, as well as for the unaffected breast to produce a symmetrical appearance.
- Routine dental care (i.e. cleanings, fillings, or dentures) or other dental services unless otherwise specified in the EOC. However, non-routine dental services received at a hospital may be covered.
- Chiropractic care is generally not covered under the health plan with the exception of manual manipulation of the spine and is limited according to Medicare guidelines.
- Routine foot care is generally not covered under the health plan and is limited according to Medicare guidelines.
- Orthopedic shoes unless they are part of a leg brace and included in the cost of the brace. Exception: orthopedic or therapeutic shoes are covered for people with diabetic foot disease.
- Supportive devices for the feet. Exception: orthopedic or therapeutic shoes are covered for people with diabetic foot disease.
- Hearing aids and routine hearing examinations unless otherwise specified in the EOC.
- Eyeglasses, with the exception of after cataract surgery, routine eye examinations, radical keratotomy, LASIK surgery, vision therapy, and other low vision aids and services unless otherwise specified in the EOC.

- Self-administered prescription medication for the treatment of sexual dysfunction, including erectile dysfunction, impotence, and anorgasm or hyporgasm unless otherwise included in the patient's Part D benefit. Please see the formulary for details.
- Reversal of sterilization measures, sex change operations, and non-prescription contraceptive supplies.
- Acupuncture
- Naturopath services
- Services provided to veterans in Veterans Affairs (VA) facilities. However, in the case of emergency situations received at a VA hospital, if the VA cost-sharing is more than the cost-sharing required under the health plan, the health plan will reimburse veterans for the difference.
- Patients are still responsible for our health plan cost - sharing amount.

Any of the services listed above that are not covered will remain not covered even if received at an emergency facility. For example, non-authorized, routine conditions that do not appear to a reasonable person to be based on a medical emergency are not covered if received at an emergency facility.

Grievance and Appeal Process

All telephonic inquiries received by IPA's Medicare Advantage Customer Service Department will be resolved on an informal basis, except for inquiries that involve "appealable" issues. Appealable issues will be routed through either the standard or expedited appeal process. In situations where a patient is not in agreement with the informal resolution, the patient must submit a written request for reconsideration. All other written correspondence received by IPA will be documented and routed through the appropriate appeal or grievance channels. Patients have the right to file a complaint, also referred to as a grievance, regarding any problems they observe or experience with the health plan. Situations for which a grievance may be filed include but are not limited to:

- Complaints about services in an optional Supplementary Benefit package.
- Dissatisfaction with the office experience such as excessive wait times, physician behavior or demeanor, or inadequacy of facilities.
- Involuntary disenrollment situations.
- Poor quality of care or service received.

Patients have the right to appeal any decision about IPA's failure to provide what they believe are benefits contained in the basic benefit package. These include:

- Reimbursement for urgently needed care outside of the service area or Emergency Services worldwide.
- A denied claim for any health services furnished by a non-participating provider or supplier they believe should have been provided, arranged for, or reimbursed by IPA.
- Services not received, but believed to be the responsibility of IPA.
- A reduction or termination of a service a patient feels medically necessary.

In addition, a patient may appeal any decision related to a hospital discharge. In this case, a notice will be given to the patient with instructions for filing an appeal.

QUALITY GUIDANCE

The Centers for Medicare & Medicaid Services (CMS) uses the Five-Star Quality Rating System to determine how much to compensate Medicare Advantage plans and educate consumers on health plan quality. The Star Ratings system consists of over 50 measures from five different rating systems. The cumulative results of these measures make up the Star rating assigned to each health plan.

Star Ratings have a significant impact on the financial outcome of Medicare Advantage health plans by directly influencing the bonus payments and rebate percentages received. CMS will award quality-based bonus payments to high performing health plans based on their Star Ratings performance. For health plans with a four star or more rating, a bonus payment is paid in the form of a percentage (maximum of five percent) added to the county benchmark. (A county benchmark is the amount CMS expects it to cost to provide hospital and medical insurance in the state and county.) After 2015, any health plans with Star Ratings below four will no longer receive bonus payments.

Star Rating Components

The Star Rating is comprised of over 50 different measures from six different rating systems:

- **HEDIS**-The Health Care Effectiveness Data and Information Set is a set of performance measures developed for the managed care industry. All claims are processed regularly to extract the NCQA (National Committee for Quality Assurance) defined measures. For example, this allows the health plan and CMS to determine how many enrollees have been screened for high blood pressure.
- **CAHPS**- Consumer Assessment of Health Care Providers and Systems is a series of patient surveys rating health care experiences performed on behalf of CMS by an approved vendor.
- **CMS**- Centers for Medicare & Medicaid Services rates each plan on administrative type metrics, such as, beneficiary access, complaints, call center hold times, and percentage of patients choosing to leave a plan.
- **PDE**- Prescription Drug Events is data collected on various medications related events, such as high-risk medications, adherence for chronic conditions, and pricing.
- **HOS**- Health Outcomes Survey is a survey that uses patient-reported outcomes over a 2.5-year time span to measure health plan performance. Each spring a random sample of Medicare beneficiaries is drawn from each participating Medicare Advantage Organization (MAO) that has a minimum of 500 enrollees and is surveyed. Two years later, these same respondents are surveyed again (i.e., follow up measurement).
- **IRE**- Medicare Advantage plans are required to submit all denied enrollee appeals (Reconsiderations) to an Independent Review Entity (MAXIMUS Federal Services).

These systems rate the plans based on six domains:

1. Staying healthy: screenings, tests and vaccines

2. Managing chronic (long term) conditions
3. Patient experience with health plan
4. Patient complaints, problems getting services, and improvement in the health plan's performance
5. Health plan customer service
6. Data used to calculate the ratings comes from surveys, observation, claims, data and medical records

CMS continues to evolve the Star Ratings system by adding, removing and adjusting various measures on a yearly basis. CMS weights each measure between one and three points. A three-point measure, or triple weighted measure, are measures that CMS finds most important and should be a focus for health plans. The composition of all rating systems is indicated below.

Health Reform

The Patient Protection and Affordable Care Act (PPACA) requires that Medicare Advantage (MA) plans be awarded quality-based bonus payments beginning in 2012, as measured by the Star Ratings system. Bonus payments are provided to MA plans that receive four or more stars. CMS assigns a benchmark amount to each county within a state, which is the maximum amount CMS will pay to provide hospital and medical benefits. All MA plans submit a bid, which is the projected cost to operate MA within the county. The spread between the bid and original benchmark is called the rebate. A bonus payment is the percentage added to the county benchmark, which increases the spread and the amount of revenue received by the health plan.

Healthcare Plan Effectiveness Data Information Set (HEDIS®)

HEDIS (a standardized data set) is developed and maintained by the National Committee for Quality Assurance (NCQA), an accrediting body for managed care organizations. The HEDIS measurements enable comparison of performance among managed care plans. The sources of HEDIS data include administrative data (claims/encounters) and medical record review data.

HEDIS measurements include measures such as Comprehensive Diabetes Care, Adult Access to Ambulatory and Preventive Care, Glaucoma Screening for Older Adults, Controlling High Blood Pressure, Breast Cancer Screening, and Colorectal Cancer Screening.

Plan-wide HEDIS measures are reported annually and represent a mandated activity for health plans contracting with the Centers for Medicare & Medicaid Services (CMS). Each spring, the Participating Plan Representatives will be required to collect from practitioner offices copies of medical records to establish HEDIS scores. Selected practitioner offices will be contacted and requested to assist in these medical record collections.

All records are handled in accordance with Participating Plan's privacy policies and in compliance with the Health Insurance Portability and Accountability Act (HIPAA) Privacy rules. Only the minimum necessary amount of information, which will be used solely for the purpose of this HEDIS initiative, will be requested. HEDIS is considered a quality-related health care operation activity and is permitted by the HIPAA Privacy Rule [see 45 CFR 164.501 and 506].

Participating Plan's HEDIS results are available upon request. Contact the Health Plan's Quality Improvement Department to request information regarding those results.

HEDIS® is a registered trademark of the National Committee for Quality Assurance (NCQA).

Star Measure Weighting

Individual Star measures can be single-weighted, 1.5-weighted or triple-weighted, with higher weight being given to those measures that CMS deems most important by which to measure plan quality. Triple-weighted measures are typically outcomes measures that measure a health plan's ability to manage chronic illnesses and keep patients healthy. Certain disease states appear in multiple measures. For example, diabetes directly impacts 7 measures and cardiovascular conditions directly impact 4 measures.

Following is a summary of the weighting of all Star measures

Part C Star Rating Measure	Weight
Breast Cancer Screening (HEDIS)	1
Colorectal Cancer Screening (HEDIS)	1
Annual Flu Vaccine (CAHPS)	1
Improving/Maintaining Physical Health (HOS)	3
Special Needs Plan (SNP) Care Management	1
Monitoring Physical Activity (HOS)	1
Adult BMI Assessment (HEDIS)	1
Care For Older Adults -- Medication Review (HEDIS)	1
Care For Older Adults -- Pain Screening (HEDIS)	1
Care For Older Adults -- Functional Status (HEDIS)	1
Osteoporosis Management in Women who had a Fracture	1
Comprehensive Diabetes Care -- Eye Exam (HEDIS)	1
Comprehensive Diabetes Care -- Kidney Disease	Expected to Retire
Comprehensive Diabetes Care -- Blood Sugar Controlled	3
Controlling Blood Pressure (HEDIS)	3
Rheumatoid Arthritis Management (HEDIS)	Retired
Reducing Risk Of Falling (HOS)	1
Managing Urinary Incontinence	1

Statin Therapy for Patients with Cardiovascular Disease	1
Plan All Cause Readmissions (HEDIS)	3
Medication Reconciliation Post Discharge (HEDIS)	1
Getting Needed Care Without Delays (CAHPS)	4
Getting Appointments And Care Quickly (CAHPS)	4
Customer Service (CAHPS)	4
Overall Rating Of Health Care Quality (CAHPS)	4
Overall Rating Of Plan (CAHPS)	4
Care Coordination (CAHPS)	4
Complaints About The Health Plan (CTM)	4
Beneficiary Access And Performance Problems (CMS)	1.5
Members Choosing To Leave The Plan (CMS)	4
Health Plan Quality Improvement (CMS)	5
Plan Makes Timely Decisions About Appeals (IRE)	4
Reviewing Appeals Decisions (IRE)	4

Part D Star Rating Measure	Weight
Foreign language interpreter & TTY/TDD Availability (Call Center)	4
Follow-up after Emergency Department Visit for Patients with Multiple Chronic Conditions	TBD
Transitions of Care – Medication Reconciliation Post - Discharge	0.5
Transitions of Care – Notification of Inpatient Admission	0
Transitions of Care – Patient Engagement After Inpatient Discharge	0.5
Transitions of Care – Receipt of Discharge Information	0
Transition of Care – Average	1
Controlling Blood Pressure	3
Kidney Health Evaluation for Patients with Diabetes	Display
Plan All-Cause Readmissions	1
Appeals Auto forward (IRE)	1.5
Appeals Upheld (IRE)	1.5
Complaints About The Health Plan (CTM)	4
Beneficiary Access And Performance Problems (CMS)	1.5
Members Choosing To Leave The Plan (CMS)	4
Drug Plan Quality Improvement (CMS)	5
Rating Of Drug Plan (CAHPS)	4
Getting Needed Prescription Drugs (CAHPS)	4
MPF Pricing Accuracy (PDE)	1
High Risk Medications (PDE)	3

<u>Diabetes Treatment (PDE)</u>	<u>3</u>
<u>Medication Adherence For Diabetes Medications (PDE)</u>	<u>3</u>
<u>Medication Adherence For Hypertension (PDE)</u>	<u>3</u>
<u>Medication Adherence For Cholesterol (PDE)</u>	<u>3</u>
<u>MTM Program Completion Rate for CMR</u>	<u>1</u>
<u>Statin Use in Persons with Diabetes (SUPD)</u>	<u>1</u>

POPULATION HEALTH TECHNOLOGY AND INTEGRATION

Information Protection Requirements and Guidance

IPA follows all applicable laws, rules, and regulations regarding the electronic transmittal and reception of Patient and Provider information. As such, if an electronic connection is made to facilitate such data transfer, all applicable laws must be followed. At all times, a provider must be able to track disclosures, provide details of data protections, and respond to requests made by IPA regarding information protection.

When an electronic connection is needed, relevant connection details will be provided to a patient by the IT Operations team who will engage with provider's staff to appropriately implement the connection. Any files placed for receipt by provider staff must be downloaded in 24 hours, as all data is deleted on a fixed schedule. If the files are unable to be downloaded, then alternate arrangements for retransmission must be made. The provider and provider's staff will work collaboratively with IPA to ensure information is adequately protected and secure during transmission.

Experience the Ease of HSConnect

- View patient eligibility
- Request precertification
- Search authorizations
- Search claims

Need More Help? Contact the HSConnect Help Line: **1-866-952-7596, Option 2** or e-mail

HSConnectHelp@hsconnectonline.com

To register for HSConnect, visit: **www.hsconnectonline.com**

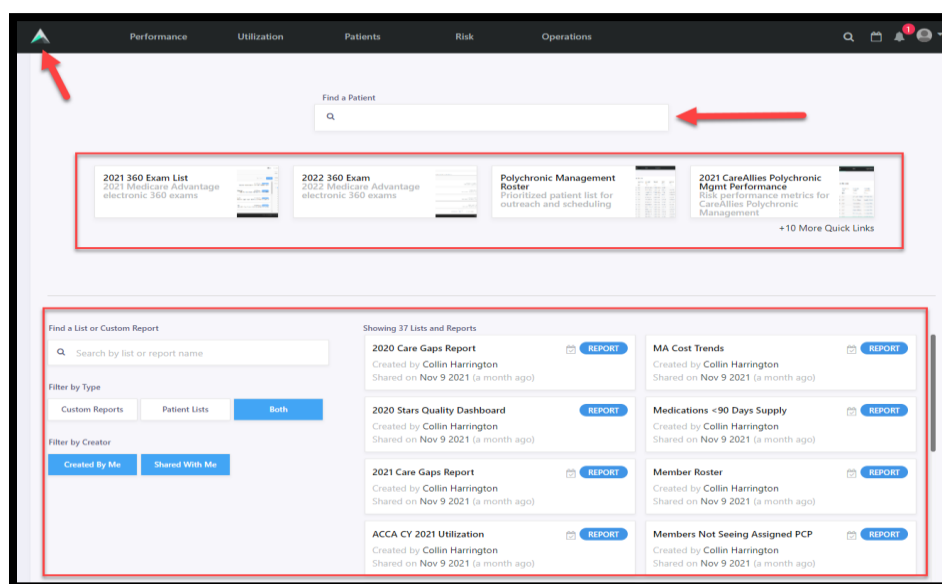
ARCADIA

Arcadia is a population health management company, specializing in data aggregation, analytics, and workflow software for value-based care. Their customers achieve financial success in their risk-sharing contracts through Arcadia's focus on creating the highest quality data asset, pushing expertly derived insights to the point of care, and supporting administrative staff with data when and where they need it with applications including care management. Arcadia has off-the-shelf integration technology for more than 40 different physical and behavioral health EHR vendors, powered by machine learning that combs through variations in over 50 million longitudinal patient records across clinical, claims and operational data sources. Arcadia software and outsourced ACO services are trusted by some of the largest risk-bearing health systems and health plans in the country to improve the bottom line. Founded in 2002, Arcadia is headquartered outside Boston in Burlington, MA, with offices in Seattle, Pittsburgh, Chicago, and Rockford, IL.

Home Page

The Home Page is the centralized location of the Arcadia platform where many essential components can be easily accessed. Returning to the Home Page can be easily done by selecting the Arcadia logo in the upper left corner from anywhere in the core platform. From this page the end user can quickly navigate to the following:

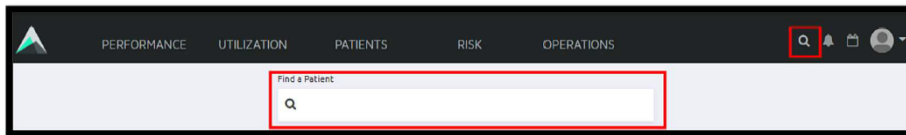
- **Search Bar:** allows users to find a specific patient by searching based on name, member ID or date of birth
- **Custom Chips:** globally filtered reports and lists that allow quick access to the Quality Dashboard, Care Gaps report, Arcadia 360 Exam List, and the Member List.
- **Custom Reports and Lists:** administrative or user created reports and lists customized to adapt to specific population needs



Patient Search

Users may search for a specific patient in the **Search Bar** near the top of the homepage or with the **Search Icon** in the upper right corner using the following:

- **Name** (Last Name, First Name)
- **Member Number**
- **Date of Birth** (MM-DD-YYYY or YYYY-MM-DD)



HELPFUL HINT!

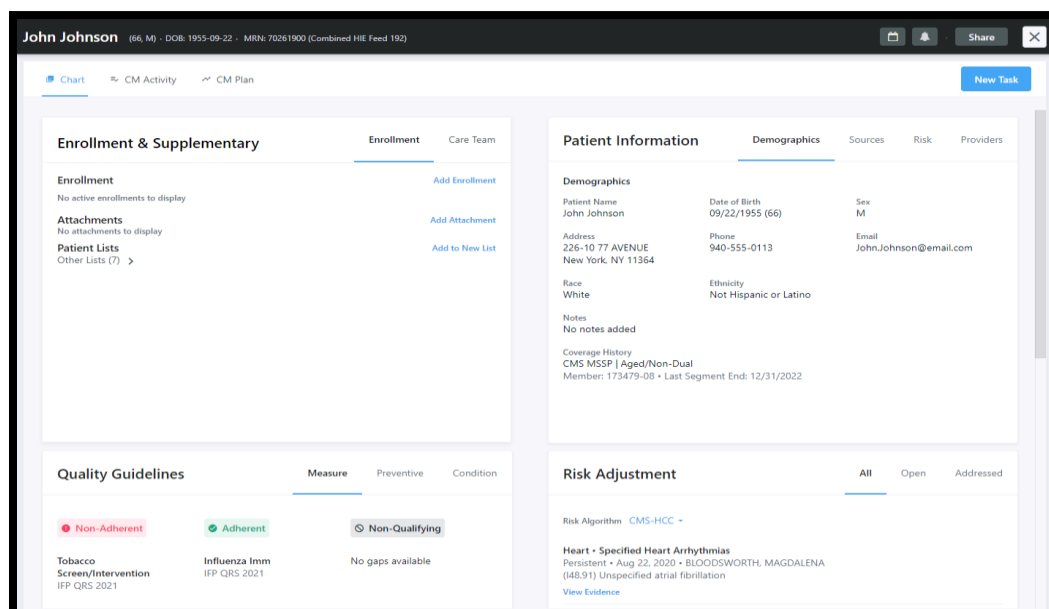
The most accurate search results come from using the exact member number or full name.

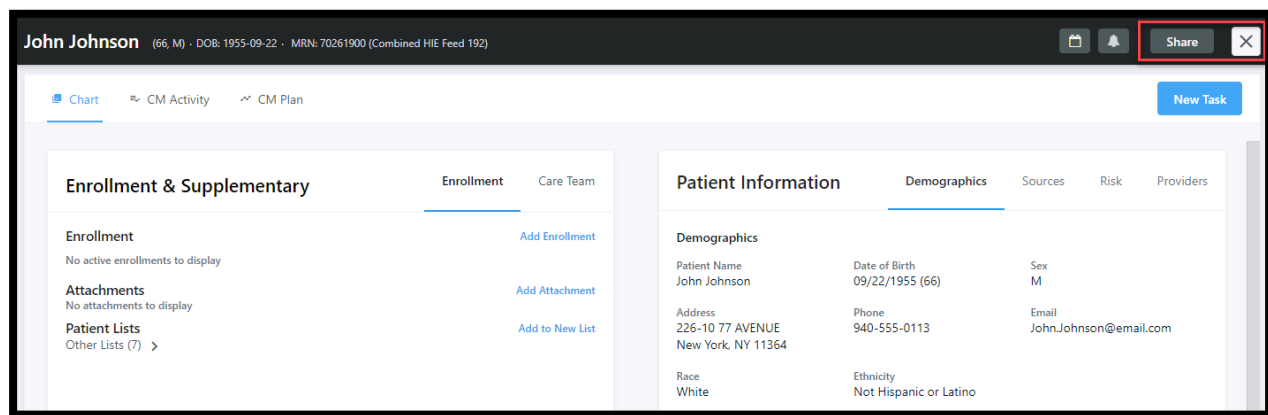
Patient Chart

The **Patient Chart** is the **longitudinal health record of the patient**.

Access to the Patient Chart may be done through a patient search or selecting a specific patient hyperlink within an Arcadia report. This chart will help orient the clinician to the following information:

- Medications
- Utilization history
- Eligible and outstanding quality measure gaps
- Chronic condition history
- Patient demographics
- Care team (Care Management users only)

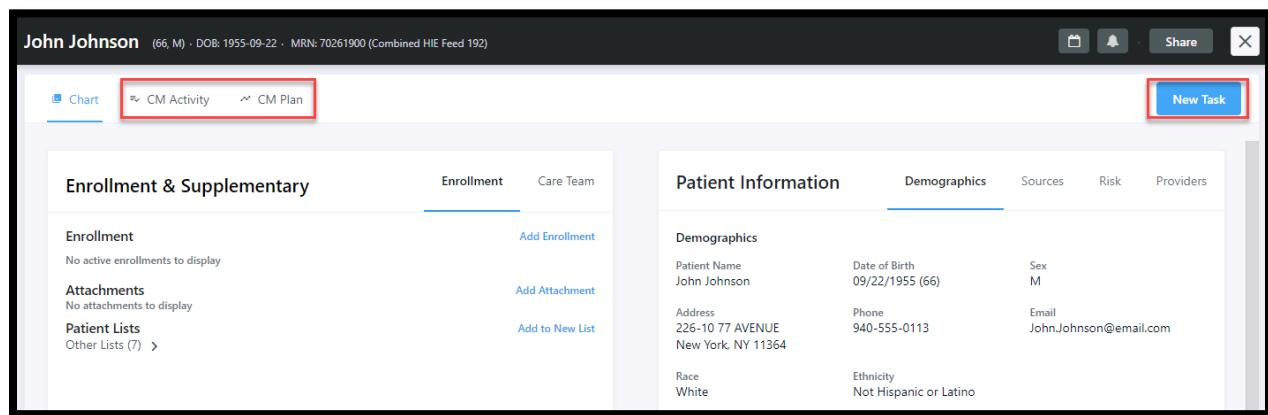




From the Patient Chart, end users will have access to the following buttons and functionality (based on individual user access rights):

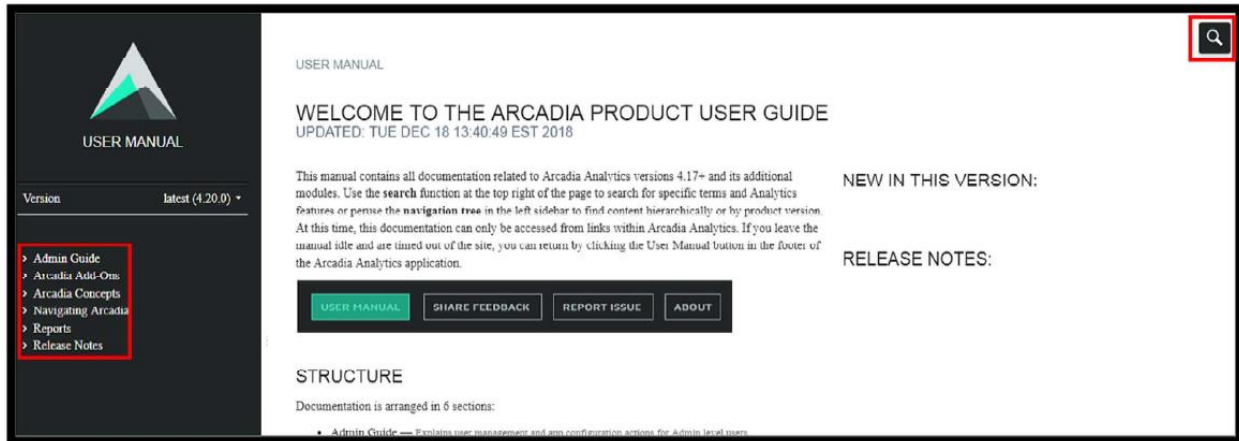
- The **Share** button allows the patient chart to be **printed or downloaded as a PDF**
- The **Back** button returns the user to the **previous report or list**
- The **360** button directs the user to enter the **Arcadia 360** module
- The **Quality** button allows access to the **Hybrid Quality** module

Patient Chart: Care Management User



In addition, end users that leverage **care management** functionality, will have access to the following tabs and buttons:

- The **CM Activity** tab displays a **scorecard view** of scheduled tasks, activities and associated detail
- The **CM Plan** tab shows information around a **set of care plan goals and actionable interventions** to achieve those goals
- The **New Task** button allows the user to **schedule various different tasks**
- The **Back to Dashboard** button returns the user to the **CM Dashboard**



The **User Manual** contains all **documentation related to Arcadia Analytics and its additional modules**. Access the manual by navigating to the bottom of the page within the Arcadia platform and selecting the User Manual button. Once in the User Manual, use the search function at the top right of the page to **search for specific terms and features** or use the **navigation tree in the left sidebar to find content hierarchically**.

Contacting Production Support

Customer Portal: "Report Issue" button in the Web Application

Email: analyticssupport@arcadia.io

Phone: 888.853.8095

Please remember to never send personal or patient sensitive information via unencrypted email. If you must provide PHI or PI, please use the customer portal or call the Production Support team for instructions on the best way to communicate sensitive information. Depending on how you created your request, you will receive an acknowledgement with a request number and possibly an estimated time of resolution for your request. Please make a note of and refer to this request number in future communications if you are not using the customer portal.

HEALTH SERVICES

The Health Services Department coordinates health care services to ensure appropriate utilization of health care resources. This coordination assures promotion of the delivery of services in a quality-oriented, timely, clinically appropriate, and cost-effective manner for the patients.

The Utilization Management staff base their utilization-related decisions on the clinical needs of patients, the patient's Benefit Plan, well-established clinical decision-making support tools, the appropriateness of care, Medicare National Coverage Guidelines, health care objectives, and scientifically based clinical criteria and treatment guidelines in the context of provider and/or patient-supplied clinical information and other such relevant information.

The IPA in no way rewards or incentivizes, either financially or otherwise, practitioners, utilization reviewers, clinical care managers, physician advisers or other individuals involved in conducting utilization review, for issuing denials of coverage or service, or inappropriately restricting care.

Goals

- To ensure that services are authorized at the appropriate level of care and are covered under the patient's health plan benefits.
- To monitor utilization practice patterns of IPA's contracted physicians, hospitals, ancillary services, and specialty providers.
- To provide a system to identify high-risk patients and ensuring that appropriate care is accessed.
- To provide utilization management data for use in the process of re-credentialing providers.
- To educate patients, physicians, contracted hospitals, ancillary services, and specialty providers about IPA's goals for providing quality, value-enhanced managed health care.
- To improve utilization of IPA's resources by identifying patterns of over- and under-utilization that have opportunities for improvement.

Departmental Functions

- Prior authorization
- Concurrent review
- Discharge planning
- Case management and disease management
- Continuity of care

Prior Authorization

The Primary Care Physician (PCP) or Specialist is responsible for requesting prior authorization of all scheduled admissions or services/procedures, for referring a patient for an elective admission, outpatient service, specialist referral and for requesting services in the home. The IPA recommends requesting prior authorization at least seven (7) days in advance of the admission, procedure, or service. Requests for prior authorization are expeditiously as the patient's health condition requires. For prior authorizations, providers should call **1-800-511-6932**. You may also submit most requests via our online portal 24 hours per day, 7 days per week at:

www.hsconnectonline.com

Services requiring prior authorization are listed in the appendix or Health Plan section of this manual, as well as on IPA's website.

The presence or absence of a service or procedure on the list does not determine coverage or benefits. Log in to HSConnect or contact customer service to verify benefits, coverage and customer eligibility.

The Prior Authorization Department documents and evaluates requests utilizing CMS guidelines and nationally recognized accepted criteria, processes the authorization determination, and notifies the provider of the determination.

Examples of information required for a determination include, but are not limited to:

- Patient name and identification number
- Location of service
- (e.g., hospital or surgi-center setting)
- Primary Care Physician name along with Tax Identification Number (TIN) or Provider Identification Number (PIN)
- Servicing/attending physician name
- Date of service
- Diagnosis
- Service/procedure/surgery description and CPT or HCPCS code
- Clinical information supporting the need for the service to be rendered

For patients who go to an emergency room for treatment, an attempt should be made in advance to contact the PCP unless it is not medically feasible due to a serious condition that warrants immediate treatment.

If a patient appears at an emergency room for care, which is non-emergent, the PCP should be contacted for direction. The patient may be financially responsible for payment if the care rendered is non-emergent. The IPA also utilizes urgent care facilities to treat conditions that are non-emergent but require immediate treatment.

Emergency admissions must be pre-certified by IPA within twenty-four (24) hours, or the next business day, of admission. Please be prepared to discuss the patient's condition and treatment plan with our nurse coordinator.

Prior Authorization is a determination of medical necessity and is not a guarantee of claims payment. Claim reimbursement may be impacted by various factors including eligibility, participating status, and benefits at the time the service is rendered.

Prior Authorization Department

Intake Unit:

- Consists of non-clinical personnel
- Receives faxes, provider portal submission and phone calls for
- services that require prior authorization
- Handles issues that can be addressed from a non-clinical perspective:
 - Did you receive my fax?
 - Does this procedure/service require prior authorization?
 - Setting up “shells” for services that must be forwarded to clinical personnel for determination
 - Creates and validates cases for services that must be forwarded to clinical personnel for medical necessity determination

Prior Authorization Unit:

- Consists of RN's and LPN's
- Performs medical necessity review of clinical requests for services such as:
 - Infusion
 - Outpatient Surgical Procedures
 - DME / O&P
 - Ambulance transports
 - Outpatient Diagnostic Testing
 - Outpatient Therapy
- Maintains clinical decision-making documentation
- Coordinates Medical Director Review of cases requiring secondary review
- Notifies customer and provider of Prior Authorization determination

Requests and Time Frames

Emergency - Authorization is not required

An Emergency Medical Condition is a medical condition manifesting itself by acute symptoms of sufficient severity (including severe pain) such that a prudent layperson, with an average knowledge of health and medicine, could reasonably expect the absence of immediate medical attention to result in:

- Serious jeopardy to the health of the individual
- Serious impairment to bodily functions;
- Or, serious dysfunction of any bodily organ or part.

Expedited:

An expedited request can be requested when you as a physician believe that waiting for a decision under the routine time frame could place the patient's life, health, or ability to regain maximum function in serious jeopardy. Expedited requests will be determined within 72 hours or as soon as the patient's health requires. An expedited request may not be requested for cases

in which the only issue involves a claim for payment for services that the patient has already received.

Routine:

A routine or standard Prior Authorization request will be determined as expeditiously as the health condition requires, but no later than 14 calendar days after receipt of the request.

Approval: Once the Precertification Department receives the request for authorization, we will review the request using nationally recognized industry standards or local Coverage Determination criteria. If the request for authorization is approved, the IPA will assign an authorization number and enter the information in our medical management system. This authorization number can be used to reference the admission, service or procedure. Approval notification is provided to the patient and the provider.

Retrospective Review

Retrospective review is the process of determining coverage for clinical services by applying guidelines/criteria to support the claim adjudication process after the opportunity for precertification or concurrent review timeframe has passed. The only scenarios in which retrospective requests can be accepted are:

- Authorizations for claims billed to an incorrect carrier
 - As long as you have not billed the claim to IPA and received a denial, you can request a retro authorization from Health Services within **±2** business days of receiving the RA from the incorrect carrier.
 - If the claim has already been submitted to IPA and you have received a denial, the request for retro authorization then becomes an appeal and you must follow the guidelines for submitting an appeal.
- IPA will retrospectively review any medically necessary services provided to IPA's patients after hours, holidays, or weekends. The IPA does require the retro authorization request and applicable clinical information to be submitted to the Health Services dept. within **±2** business day of providing the service or admitting the patient.
- In accordance with IPA's policy, retrospective requests for authorizations not meeting the scenarios listed above may not be accepted and these claims may be denied for payment.
- After confirming the patient's eligibility and the availability of benefits at the time the service was rendered, providers should submit all supporting clinical documentation with the request for review and subsequent reimbursement via fax to **1-832-553-3420**. Please refer to the Prior Authorization Grid in the appendix section on your specific service for authorization guidelines and/or requirements.
- The requesting provider has the responsibility of notifying the patient that services are approved and documenting the communication in the medical record.

Discharge Planning and Acute Care Management

Discharge Planning is a critical component of the process that begins with an early assessment of the patient's potential discharge care needs in order to facilitate transition from the acute setting to the next level of care. Such planning includes preparation of the patient and his/her family for any discharge needs along with initiation and coordination of arrangements for placement and/or services required after acute care discharge.

The IPA may work with ACCMs to coordinate with the facility discharge planning team to assist in establishing a safe and effective discharge plan. The ACCM nurse will facilitate the communication for all needed authorizations for services, equipment and skilled services upon discharge.

Adverse Determinations

Rendering of Adverse Determinations (Denials)

The Utilization Management staff is authorized to render an administrative denial decision to participating providers based only on contractual terms, benefits, or eligibility.

Every effort is made to obtain all necessary information, including pertinent clinical information and original documentation from the treating provider to allow the Medical Director to make appropriate determinations.

Only an IPA Medical Director may render an adverse determination (denial) based on medical necessity but he/she may also make a decision based on administrative guidelines. The Medical Director, in making the initial decision, may suggest an alternative Covered Service to the requesting provider. If the Medical Director makes a determination to deny or limit an admission, procedure, service, or extension of stay, the IPA notifies the facility or provider's office of the denial of service. Such notice is issued to the provider and the patient, when applicable, documenting the original request that was denied and the alternative approved service, along with the process for appeal.

The IPA's employees are not compensated for denial of services. The PCP or attending physician may contact the Medical Director by telephone to discuss adverse determinations.

Notification of Adverse Determinations (Denials)

The reason for each denial, including the specific utilization review criteria with pertinent subset/information or benefits provision used in the determination of the denial, is included in the written notification and sent to the provider and/or patient as applicable. Written notifications are sent in accordance with CMS and NCQA requirements to the provider and/or patient as follows:

- **For non-urgent pre-service decisions** – within 14 calendar days of the request.

- **For urgent pre-service decisions** - within 72 hours or three calendar days of the request.
- **For urgent concurrent decisions** – within 24 hours of the request.
- **For post-service decisions** – within 30 calendar days of the request.

The IPA complies with CMS requirements for written notifications to patients, including rights to appeal and grievances. For urgent care requests, the IPA notifies the provider(s) only of the decision since the treating or attending practitioner is acting as the patient's representative. If the denial is either concurrent or post service (retrospective) and the patient is not at financial risk, the patient is not routinely notified. An **Advanced Beneficiary Notice (ABN)** may not be used to hold patients liable for services unless a preservice organization determination has already been rendered.

Appeals

An appeal is a request for the IPA to review a previously made decision related to medical necessity, clinical guidelines, or prior authorization and referral requirements. You must receive a notice of denial, or remittance advice before you can submit an appeal. Please do not submit your initial claim in the form of an appeal.

You may appeal a health services or Utilization Management denial of a service not yet provided, on behalf of a patient. The patient must be aware that you are appealing on his or her behalf. Patient appeals are processed according to Medicare guidelines.

An appeal must be submitted within 60 days of the original decision unless otherwise stated in your provider agreement. With your appeal request, you must include a copy of your denial, any medical records that would support the medical necessity for the service, hospital stay, or office visit, and a copy of the insurance verification completed on the date of service.

You may appeal a previous decision not to pay for a service. For example, claims denied for no authorization or no referral, including a decision to pay for a different level of care; this includes both complete and partial denials. Examples of partial denials include denials of certain levels of care, isolated claim line items, or a decreased quantity of office or therapy visits. Total and partial denials of payment may be appealed using the same appeal process. Your appeal will receive an independent review by the Health Services representative not involved with the initial decision. Requesting an appeal does not guarantee that your request will be approved or that the initial decision will be overturned. The appeal determination may fully or partially uphold the original decision.

Appeals can take up to 60 days for review and determination. Timely filing requirements are not affected or changed by the appeal process or by the appeal outcome. If an appeal decision results in approval of payment contingent upon the filing of a corrected claim, the time frame is not automatically extended and will remain consistent with the timely filing provision in the IPA's agreement.

You should submit your appeal using the "Request for Appeal or Reconsideration" form and medical records. There are several ways to submit your appeal to the IPA. You may the appeal

request form attached.

Part C Appeals Address and Fax Number:

El Paso Integral Care

Attn: Appeals Unit PO Box 2888

Houston, TX 77252-2888

Phone: 1-832-553-3300

Fax: 1-832-553-3418

Medicare Appeals and Reconsideration Form

APPEALS AND RECONSIDERATION REQUEST FORM

Complete the top section of this form completely and legibly. Check the box that most closely describes your appeal or reconsideration reason. Be sure to include any supporting documentation, as indicated below. Requests received without required information cannot be processed.

Request for appeal or reconsideration

Customer first name: MI:

Customer ID #:

Claim #:

Provider name/contact name:

Provider phone #:

Customer last name:

Customer date of birth (MM/DD/YYYY):

Date of service (MM/DD/YYYY):

Provider NPI:

Provider's contact email address:

Appeals

Reason for appeal:

☐ Medical necessity

☐ Notification/precertification

• Include precertification/prior authorization number

☐ Referral denial

☐ Payer policy

Submit Appeals to:

El Paso Integral Care

Attn: Appeals Unit

PO Box 2888

Houston, TX 77252-2888

Phone: 1-832-553-3300

Fax: 1-832-553-3418

Reconsiderations

Reason for reconsideration:

☐ Payment issue

☐ Duplicate claim

☐ Retraction of payment

☐ Request for medical records

• Include copy of letter/request received

☐ Request for additional information

• Include copy of letter/request received

• Provide missing or incomplete information

• Coding dispute

• Timely filing

• Remittance Advice (RA), Explanation of Benefits (EOB), or other documentation of filing original claim

☐ Coordination of Benefits

Submit reconsiderations to:

El Paso Integral Care

Attn: EPIC

PO Box 2888

Houston, TX 77252-2888

Fax: 1-832-553-3418

Note: If you have multiple reconsideration requests for the same health care professional and payment issue, please indicate this in the notes below and include a list of the following: Customer ID #, Claim #, and date of service. If the issue requires supporting documentation as noted above, it must be included for each individual claim. If no additional documentations required for your appeal or reconsideration request, fax in only this completed coversheet. You may use the space below to briefly describe your reason for appeal or reconsideration.

Definitions

Payment issue: Was not paid in accordance with the negotiated terms

Coordination of benefits: Could not fully be processed until information from another insurer has been received

Duplicate claim: The original reason for denial was due to a duplicate claim

Medical necessity: Medical clinical review

Pre-certification/notification of prior-authorization or reduced payment: Failure to notify or pre-authorize services or exceeding authorized limits

Payer policy clinical: Incorrectly reimbursed because of the payers payment policy

Referral denial: Invalid or missing primary care physician (PCP) referral

Request for additional information: Missing or incomplete information *reply via sender*

Request for medical records: Please include copy of letter/request received

Retraction of payment: Retraction of full or partial payment

Timely filing: The claim whose original reason for denial was untimely filing

IPA CARE COORDINATION

The Primary Care Physician (PCP) is the patient's primary point of entry into the health care delivery system for all outpatient specialist care.

The PCP is required to obtain a referral for most outpatient specialist visits for IPA's patients. Referrals can be requested through several methods, such as:

- HSConnect
- Phone

Likewise, the specialist is required to ensure that a referral is in place prior to scheduling a visit (except urgent/emergent visits, which do not require referral). The specialist is also required to communicate to the PCP via consultation reports any significant findings, recommendations for treatment and the need for any ongoing care.

Electronic submission/retrieval of referrals through HSConnect helps to ensure accurate and timely processing of referrals.

All referrals must be obtained prior to services being rendered. No retro-authorizations of referrals will be accepted. Please note that CareAllies value the PCP's role in taking care of our IPA's patients and that the PCP has a very important role in directing the patient to the appropriate specialist based on your knowledge of the patient's condition and health history. It is also absolutely essential that patients are directed to participating providers only. In order to ensure this, please refer to our online directory or contact Customer Service for assistance.

Remember: An authorization number does not guarantee payment – services must be a covered benefit. Please verify benefits before providing services.

Referral Guidelines

- PCPs should refer only to IPA's participating specialists for outpatient visits.
- Non-participating specialist's visits require prior authorization by IPA.
- Referrals must be obtained PRIOR to specialist services being rendered.
- PCPs should not issue retroactive referrals.
- Most referrals are valid for 180 days starting from the issue date.
- All requests for referrals must include the following information:
 - Patient Name, Date of Birth, patient ID
 - PCP Name
 - Specialist Name
 - Date of Referral
 - Number of visits requested

If a patient is in an active course of treatment with a specialist at the time of enrollment, The IPA will evaluate requests for continuity of care. A PCP referral is not required, but

an authorization must be obtained from IPA's Prior Authorization Department. For further details, please refer to the Continuity of Care section in Health Services. Please note: A specialist may not refer the patient directly to another specialist unless within scope of treatment. If a patient needs care from another specialist, he/she must obtain the referral from his/her PCP.

Self-Referrals

Patients have open access to certain specialists, known as self-referred visits/services; these include but are not limited to:

- Emergency medicine (emergency care as defined in the provider contract)
- Obstetric and Gynecological care (routine care, family planning)

Please refer to IPA's website to view the current provider directory for Participating Specialists. If a patient has a preference, the PCP should accommodate this request if possible. The only exceptions where the patient may self-refer are:

- To a Participating Gynecologist for annual gynecological exam except for infertility and to see a non-participating OB/GYN. The PCP may perform the annual exam if agreed upon by the patient.

Primary Care Physician's Referral Responsibilities

A PCP is responsible for ensuring a patient has a referral prior to the appointment with the specialist. There are two ways a PCP can obtain referral to specialists:

- Log in to HSConnect.
- Submit all referrals through HSConnect
- Call in to the Referral Department:

If the referral is an emergency, or you simply would like to speak with a referral department representative, you may obtain a referral by phone by calling Precert:

- Local: **1-713-437-3060**
- Toll Free Fax: **1-855-700-2928** Local Fax: **1-832-553-3420**

Specialist Physician's Referral Responsibilities

Specialists must have a referral from a PCP prior to seeing a patient if the patient's health plan requires a referral. Claims will be denied if a specialist sees a patient without a referral when the health plan requires a referral. The IPA is unable to make exceptions to this requirement. If a referral is not in place, specialists must contact the patient's PCP before the office visit. In order to verify that a referral has been made, the specialist may log in to HSConnect or the specialist may call to verify.

Instructions for a Specialist to Obtain Referrals:

The specialist can obtain referrals directly for the patient to another specialist with the following limits:

- The PCP referred the patient to the specialist
- The following five (5) conditions must be met:
 1. Diagnosis must be related to the specialty and/or service to be obtained;

2. Diagnosis must be related to reason PCP referred to referring specialist;
 3. Must be a covered benefit of the health plan;
 4. The patient must be currently under the care of the referring specialist;
 5. And, referral must be made to a participating provider.
- The specialist provides follow-up documentation to the PCP for all referrals obtained for further specialty care.
 - Referrals for the following specialty care are excluded from this process and must be referred back to the PCP to obtain referral: Non-participating providers, Chiropractor, Dermatology, Otolaryngology, Maxillofacial Surgeon, Podiatry, Optometry, Transplant Specialist, and Reconstructive (Plastic) Surgeon with the exception of breast reconstruction.
 - The referral must be obtained prior to the services being rendered.

Note: If all elements within the limits above cannot be met, the specialist must defer back to the PCP for further services.

The specialist may obtain referrals via HSConnect or telephone.



2021

Welcome to HSConnect!

From the HSConnect Provider Portal you're able to:

- ☐ Submit Authorizations
- ☐ View Authorizations
- ☐ Check Member Eligibility & Copay Info
- ☐ Check Claim Status

Creating an Account

1. Access HSConnect:
<https://www.hsconnectonline.com/foe/login.aspx>
2. In the "Sign in" Box click: "Need a new account click here"
3. Enter the requested provider information to correctly process the request.
4. If prompted, select the regional portal to access.
5. Enter the requested information and click submit.

Account Creation Definitions:

Requestor Name

Individual completing request. Preferably office manager / administrator.

Requestor Email

Individual requestor email address.

Requestor Phone Number

Including area code & extension (if applicable).

Coverage Group Name

Operating name and/or name used with general public.

Coverage Group Description

The provider type of the requesting group. Enter practitioner, facility or ancillary.

Providers

At least one provider is required (up to 5 can be entered in the initial request). Please supply both first and last name. NPI provided should be NPI used on claim submissions.

*Note - both name and NPI are required



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PHARMACY QUALITY PROGRAMS

Narcotic Case Management

The Narcotic Case Management Program is designed to identify patterns of inappropriate opioid utilization with the goal to enhance patient safety through improved medication use. Monthly reports are generated using an algorithm that identifies customers at risk of potential opioid overutilization based on the number of prescribers, pharmacies, and calculated morphine milligram equivalent (MME) per day. Any individual with cancer or on hospice care is excluded from the program. The Health Services clinical staff review claims data of all identified customers who meet the established criteria and determine whether further investigation with prescribers is warranted. If intervention is deemed appropriate, clinical staff will send written notification by fax to the prescribers involved in the customer's care requesting information pertaining to the medical necessity and safety of the current opioid regimen. Health Services will reach out to discuss the case with the customer's opioid prescriber(s) in an attempt to reach a consensus regarding the customer's opioid regimen. If clinical staff is able to engage with prescribers, then action will be taken based on an agreed upon plan. In the most severe cases, clinical staff may collaborate with the prescriber(s) to implement customer-specific limitations to assist with control of inappropriate utilization or overutilization of opioid medications. The limitations may require customers to use only selected pharmacies or prescribers for opioid medications or limit the amount of opioid medication covered by the health plan. If Health Services does not receive a response from the prescribers, despite multiple outreach attempts, then limitations may be invoked based on the decision of an internal, multi-disciplinary team.

Medication Therapy Management

The Medication Therapy Management program is designed to help improve medication therapy outcomes by identifying gaps in care, addressing medication adherence, and recognizing potential cost savings opportunities. The program is designed for customers that satisfy all three of the following criteria:

- Have at least three of the following conditions: Chronic Heart Failure (CHF), Diabetes, Dyslipidemia, Hypertension, and Osteoporosis
- Take at least seven Part D prescription drugs from select classes; and
- Are likely to incur annual costs for covered drugs greater than or equal to \$4,255

Eligible customers are automatically enrolled into the program and sent a welcome letter encouraging each customer to call to complete their **Comprehensive Medication Review (CMR)** before their annual wellness visit with their primary care provider, so the customer can take their medication list to the appointment. A comprehensive medication review is a personal review of prescriptions, OTC medications, herbal therapies, and dietary supplements with a clinical pharmacist. After the completion of the CMR, any potential **drug therapy problems (DTPs)** that were identified are sent to the prescribing provider and/or primary care provider by mail or fax. Along with DTPs, the provider also receives an updated list of the customer's medication history through the previous 4 months. Also, an individualized letter, which includes a personal medication record of all medications discussed and a medication action plan, is mailed to the customer. If the customer has any questions or comments about the medication action plan, a phone number is provided for follow up. In addition to the CMR, customers also receive **targeted medication reviews (TMRs)** quarterly. The TMRs are automatically generated and completed electronically to review for specific DTPs. If any DTPs are identified, a letter may be mailed or faxed to the prescribing provider and/or primary care provider.

There is no additional cost for participation in the MTM program. MTM Program CMR completion rate is a Part D Star rating based off the percentage of customers who meet eligibility criteria for MTM program and who receive a CMR. Refer eligible customers to the MTM program at **1- 800-625-9432** to complete their annual CMR.

Drug Utilization Review

Health Services completes a monthly review of prescription drug claims data to assess dispensing and use of medications for IPA customers. **Drug Utilization Review (DUR)** is a structured and systematic attempt to identify potential issues with drug therapy coordination among prescribers, unintentional adverse drug events (including drug interactions), and non-adherence with drug regimens among targeted classes of drugs.

Retrospective Drug Utilization Review (rDUR) evaluates past prescription drug claims data, and concurrent Drug Utilization Review (rDUR) ensures that a review of the prescribed drug therapy is performed before each prescription is dispensed. rDUR is typically performed at the point-of-sale, or point of distribution, by both the dispensing pharmacist and/or through automated checks that are integrated in the pharmacy claims processing system. Health Services tracks and trends all drug utilization data on a regular basis to enable our clinical staff to determine when some type of intervention may be warranted, whether it is customer-specific or at a population level. Targeted providers and/or customers identified based on DUR activity will receive information regarding the quality initiative by mail or fax. rDUR studies that may be communicated to customers and/or providers include:

- Failure to refill prescribed medications
- Drug-drug interactions
- Therapeutic duplication of certain drug classes
- Narcotic safety including potential abuse or misuse
- Use of medications classified as High Risk for use in the older population

- Use of multiple antidepressants, antipsychotics, or insomnia agents concurrently
- Multiple prescribers of the same class of psychotropic drug

Letters to customers will focus on topics such as the importance of appropriate medication adherence or safety issues. Letters to providers will include the rationale for any of the particular concerns listed above that are the subject of the initiative. Provider letters will also include drug claims data for the selected calendar period applicable to the initiative. If you (as a provider) receive a letter indicating that you prescribed a medication that you did not, in fact, prescribe, please notify Health Services using the contact information on the letter.

A multidisciplinary team determines the direction of pharmacy quality initiatives for the DUR program. The pharmacy quality initiative concepts originate from a variety of sources, including but not limited to, claims data analysis and trends, the **Centers for Medicare and Medicaid Services (CMS)** guidance, **Pharmacy Quality Alliance (PQA)** measures and initiatives, **Food and Drug Administration (FDA)** notifications, clinical trials or clinical practice guidelines, and other relevant healthcare quality publications.

Important Opioid cDUR Changes for 2020

Opioid initiatives for 2020 focus on strategies to help prevent and combat opioid overuse among our beneficiaries through the use of cDUR. Safety controls will be implemented at point-of-sale, including “soft” and “hard” cDUR edits, which will both reject the claim. The dispensing pharmacy may override a “soft” rejection by entering the appropriate pharmacy professional service (PPS) codes upon consulting the prescriber and/or determining safe and appropriate use of the medication. “Hard” rejections can’t be overridden at point-of-sale, and in order to request coverage of the medication(s), a coverage determination must be initiated. Listed below are the opioid changes that occurred in 2020, which are in line with CMS guidance on required and recommended changes to utilization management of opioid prescriptions:

- Opioid prescriptions will be limited to a maximum of a one-month supply OR a seven-day supply in opioid naïve customers. Cigna defines “opioid naïve” as customers who have not had an opioid medication filled within the past 120 days. This is a “hard” cDUR edit and will require a coverage determination for coverage under the beneficiary’s Part D plan if a day supply exceeding these limits is needed.
- Opioid prescriptions for customers who have claims exceeding a total of 90 MME per day AND have two or more opioid prescribers will receive a “soft” rejection at point-of-sale. A coordination of care between the prescriber and dispensing pharmacist is encouraged. Upon consulting the prescriber and receiving approval, the dispensing pharmacist may use pharmacy professional service (PPS) codes to override the “soft” rejection.
- Opioid prescriptions will “soft” reject at point-of-sale if an interaction with a benzodiazepine is detected. The dispensing pharmacist may override the denial with PPS codes if the pharmacist consults with the prescriber, provides customer counseling, and/or determines that it is safe to dispense the medication(s).
- Opioid prescriptions for long-acting opioid medications will “soft” reject at point-of-sale if a duplication of therapy is detected between two or more long-acting opioid medications. The dispensing pharmacist may override the denial with PPS codes if the pharmacist consults with the prescriber, provides customer counseling and/or determines that it is safe to dispense the opioid medication(s).

Prescription Drug Monitoring Programs

Nearly all states currently require pharmacies and other dispensers to submit records of certain prescription drugs dispensed on a daily to monthly basis. These data are compiled into state-run databases, termed **prescription drug monitoring programs (PDMPs)**, and made available in a searchable format to prescribers and pharmacists for use in monitoring drug utilization and abuse.

In their landmark 2016 Guideline for Prescribing Opioids for Chronic Pain, the CDC features PDMPs prominently in their final recommendations:

- Clinicians should review the patient's history of controlled substance prescriptions using state prescription drug monitoring program (PDMP) data to determine whether the patient is receiving opioid dosages or dangerous combinations that put him or her at high risk for overdose.
- Clinicians should review PDMP data when starting opioid therapy for chronic pain and periodically during opioid therapy for chronic pain, ranging from every prescription to every 3 months.

As part of our ongoing partnership with providers to decrease the unnecessary use and diversion of controlled substances, Health Services encourages prescribers and pharmacists to fully utilize their state's PDMP. You may find your state's PDMP at:

<http://www.pdmpassist.org/content/state-pdmp-websites>.

MedWatch: The FDA Adverse Event Reporting Program

The Food & Drug Administration (FDA) MedWatch is a safety information and adverse event reporting program that allows both clinicians and consumers to report serious issues with human medical products and receive safety information updates. The FDA relies on clinicians to report medical adverse events after a drug product is marketed, as clinical trials may not elucidate all potential safety concerns for patients.

It is appropriate to report issues related to prescription and over-the-counter medications, biologics, medical devices, combination products, special nutritional products (infant formulas, medical foods), cosmetics, and foods/beverages to FDA's MedWatch Adverse Event Reporting Program. Types of events to report include: serious adverse events, product quality problems, product use/medication errors, therapeutic inequivalence/failure, and counterfeit medical products.

Clinicians may submit a report using Form 3500, available online at **www.fda.gov/medwatch/report.htm**, or by downloading and mailing:

**5600 Fishers Lane
Rockville, MD
20852-9787**

Or, faxing the form (fax number **1-800-332-0178**)

Questions about the form can be answered at **1-800-332-1088**.

Safety problems with tobacco, vaccines, investigational study drugs, veterinary products, and dietary supplement problems should not be reported to FDA MedWatch.

Adverse events with vaccines can be reported through **the Vaccines Adverse Event Reporting System (VAERS)** at <https://vaers.hhs.gov/reportevent.html>. For additional information on where to submit adverse event reports for the other product types, visit <https://www.accessdata.fda.gov/scripts/medwatch/index.cfm?action=reporting.home>.

Voluntary adverse event reporting is critical to maintain FDA surveillance of product safety. One single report could prompt a product safety investigation that could result in product label updates, Medication Guide inclusion criteria, product recalls, and/or product design, process, packaging, or distribution changes.

Additionally, subscribing to MedWatch Safety Alerts via Email (**MedWatch E-list**), **Twitter (@FDAMedWatch)**, or **RSS** provides a consumer-friendly platform by which to easily stay updated with recent alerts, and in turn, help improve the overall care and safety of patients.

QUALITY CARE MANAGEMENT PROGRAM

Mission Statement

IPA is dedicated to improving the health of the community we serve by delivering the highest quality and greatest value in health care benefits and services.

Values:

- Integrity – We always conduct ourselves in a professional and ethical manner.
- Respect – We all have value and will treat others with dignity and esteem.
- Team – We recognize that employees are our main asset and encourage their continued development.
- Communications – We encourage the free exchange of thoughts and ideas.
- Balance – We manage both our personal and company priorities.
- Excellence – We continuously strive to exceed our patients' expectations.
- Prudence – We always use the company's financial resources wisely.

Quality Principles

IPA shall apply the guiding values described above to its oversight and operation of its system and:

- Provide services that are clinically driven, cost effective and outcome oriented.
- Provide services that are culturally informed, sensitive and responsive.
- Provide services that enable patients to live in the least restrictive, most integrated community setting appropriate to meet their health care needs.
- Ensure that guidelines and criteria are based on professional standards and evidence-based practices that are adapted to account for regional, rural and urban differences.
- Foster an environment of quality of care and service within the IPA, the Senior Segment of IPA and through our provider partners.
- Promote patient safety as an over-riding consideration in decision-making.

The Quality Improvement program provides guidance for the management and coordination of all quality improvement and quality management activities throughout the IPA and its affiliates.

The program describes the processes and resources to continuously monitor, evaluate and improve the clinical care and service provided to enrollees for their physical health. The program also defines the methodology for identifying improvement opportunities and for developing and implementing initiatives to impact opportunities identified:

- All aspects of physical care including accessibility, availability, level of care, continuity, appropriateness, timeliness and clinical effectiveness of care and services provided through IPA and contracted providers and organization.
- All aspects of provider performance relating to access to care, quality of care including provider credentialing, confidentiality, medical record keeping and fiscal and billing activities.
- All services covered.

- All professional and institutional care in all settings including hospitals, skilled nursing facilities, outpatient and home health.
- All providers and any delegated or subcontracted providers.
- Aspects of IPA's internal administrative processes which are related to service and quality of care including credentialing, quality improvement, pharmacy, health education, health risk assessments, clinical guidelines, utilization management, patient safety, case management, disease management, special needs, complaints, grievances and appeals, customer service, provider network, provider education, medical records, patient outreach, claims payment and information systems

Quality Management Program Goals

The primary objective of the Quality Improvement program is to promote and build quality into the organizational structure and processes to meet the organization's mission of improving the health of the community we serve by delivering the highest quality and greatest value in health care benefits and services.

The goals the organization has established to meet this objective are:

- Maintain an effective quality committee structure that:
 - Fosters communication across the enterprise;
 - Collaboratively works towards achievement of established goals;
 - Monitors progress of improvement efforts to established goals;
 - Provides the necessary oversight and leadership reporting.
- Ensure patient care and service is provided according to established goals and metrics.
- Ensure identification and analysis of opportunities for improvement with implementation of actions and follow-up as needed.
- Promote consistency in quality program activities.
- Ensure the QI program is sufficiently organizationally separate from the fiscal and administrative management to ensure that fiscal and administrative management does not unduly influence decision-making regarding organizational determinations and/or appeals of adverse determinations of covered benefits.
- Ensure timely access to and availability of safe and appropriate physical health services for the population served by IPA.
- Ensure services are provided by qualified individuals and organizations including those with the qualifications and experience appropriate to service patients with special needs.
- Promote the use of evidence-based practices and care guidelines.
- Improve the ability of all IPA's staff to apply quality methodology through a program of education, training, and mentoring.
- Establish a rigorous delegation oversight process.
- Ensure adequate infrastructure and resources to support the Quality Improvement program.
- Ensure provider involvement in maintaining and improving the health of IPA's patients, through a comprehensive provider partnership.

Embedded Care Coordination

The CareAllies Embedded Care Coordination (ECC) Program provides practice support to assist Physicians in providing quality care and achieving better clinical outcomes. The Embedded Care Coordinator (ECC) is typically an RN or LVN. The ECC is a dedicated resource assigned to a Physician's office.

10 FIVE-STAR STRATEGIES

Recommendations from Embedded Care Coordinators

Embedded Care Coordinators (ECCs) are nurses employed by the plan. ECCs are embedded in physician offices to help improve or maintain a physician's Part C and D Star ratings by helping to identify and close Star gaps. ECCs have identified 10 strategies PCPs can take to help improve our Drive To Five Star Quality Rating Initiatives.

STRATEGY	TACTICS	OUTCOMES
1. Practice Coordinator (PC)	Appoint a PC to work with ECC staff on Stars tasks such as: delivering and reviewing discharge reports, discussing opportunities to improve medication adherence, and important documentation such as referral forms, list of covered Rheumatoid Arthritis (RA) approved medications with RA Trigger target lists, list of covered statin medications to address the Statin Use in Diabetes (SUDP) target lists, etc.	Helps ensure that Stars metrics are fully addressed.
2. Strategy sessions	Schedule planning sessions with PC, ECC and staffers to establish strategies to be executed throughout the year.	Helps meet short- and long-term goals, establish priorities and meet deadlines.
3. Empower PC	Empower PC to delegate certain Stars tasks to staffers.	Helps prioritize focus of the PC, meet deadlines and engage staff in fulfilling Stars tasks.
4. Individual education	Enable ECC to schedule regular 1:1 educational encounters to review best practices with all staff members.	Helps maintain workflow if a staff member is out, reduce discrepancies by establishing best practices and helps staff members feel important.
5. Tools and resources	Develop Stars related workflows, guides, and cheat sheets for current and new staff to reference.	Helps ensure all steps are followed to reach gap closure.
6. Timeliness	Establish deadlines that align with the ECC's routine needs and encourage staff to prioritize their work week to meet common goals.	Helps ECC provide progress updates and helps staff prioritize weekly goals.
7. Relatability	Increase PCP face-time with ECC and staffers by scheduling monthly 30-minute conversations to review reports and address outcomes.	In addition to improved outcomes, monthly face-time meetings make PCPs more relatable and help staffers stay present and engaged.
8. Communication technology	Empower ECC to send direct messages to PCP via EMR.	Helps reduce the amount of time it takes to close a gap.
9. Organization	Create an organization system to keep Star reports and important documents in a convenient place that can be easily accessed, reviewed and updated.	Helps create reminders of pending tasks and notation of completed tasks.
10. Proactive Engagement	Be proactive and engaged by moving through tasks early. For example, some offices schedule all labs and EE-focused appointments in Q4 to be completed in Q1.	Strong forward momentum and early resolutions are important in our Drive to 5 Stars Quality Initiatives.

HEALTH PLANS

Cigna Medicare Advantage (Cigna MA)

Transportation Benefit

Patients may schedule transportation with Access2Care 24 hours a day, seven days a week by calling toll-free **1-866-214-5126**.

1. To schedule transportation **TO** a doctor's visit:

Patient should call **Access2Care**:

- By 4:00 pm, 24 hours in advance, to schedule a trip.
- 72 hours in advance to schedule trip to health plan's Patient Orientation Meeting.
- If someone will accompany them (limited to one adult).
- If they will be using a wheelchair.

Important: Patient must be ready for pick-up at **LEAST** one hour before their medical appointment. Driver will arrive at patient's residence up to one hour before scheduled medical appointment.

To **cancel**, patient must call AT LEAST three hours before scheduled pick-up time.

2. To schedule transportation **FROM** a doctor's visit Patient should call the phone number on the card that driver gives them upon arrival at appointment

- Call when they are ready for their return trip.
- Driver will arrive within one hour of the call.
- Do not call Access2Care.

3. To a **PHARMACY** on the way home

Patient should call Access2Care:

- Before the driver picks up patient for the return trip
- Pharmacy trips are allowed after a medical appointment or hospital discharge
- Pharmacy trips are not allowed as a stand-alone trip

Please note:

- Each trip is limited to 70 miles one way from patient's residence or Adult Day Care to health care professional's office.
- Transportation to health care professional's office and transportation to return home (round trip) is considered two trips.
- Patient must check their benefits to determine eligibility and number of trips available per benefit year.

Case Management Services

Participating Plan's case management program is an administrative and clinically proactive process that focuses on coordination of services for patients with multiple comorbidities, complex care needs and/or short-term requirements for care. The program is designed to work as a partnership between patients, providers, and other health services staff. The goal is to provide the best clinical outcomes for patients. The central concept is early identification, education, and measurement of compliance with standards of care. The case management staff strives to enhance the patient's quality of life, facilitates provision of services in the appropriate setting, and promotes quality cost effective outcomes. Staff patients with specific clinical expertise provide support services and coordination of care in conjunction with the treating provider.

Case Management Program Goals

The Health plan has published and actively maintains a detailed set of program objectives available upon request in our case management program description. These objectives are clearly stated, measurable, and have associated internal and external benchmarks against which progress is assessed and evaluated throughout the year. Health plan demographic and epidemiologic data, and survey data are used to select program objectives, activities, and evaluations.

Case Management Approach

The Participating Plans have multiple programs in place to promote continuity and coordination of care, remove barriers to care, prevent complications and improve patient quality of life. It is important to note that the Health plan treats disease management as a component of the case management continuum, as opposed to a separate and distinct activity.

In so doing, we are able to seamlessly manage cases across the care continuum using integrated staffing, content, data resources, risk identification algorithms, and computer applications.

The Health plan employs a segmented and individualized case management approach that focuses on identifying, prioritizing, and triaging cases effectively and efficiently. Our aim is to assess the needs of individual patients, to secure their agreement to participate, and to match the scope and intensity of our services to their needs. Results from health risk and diagnostic values are combined using proprietary rules, and used to identify and stratify patients for case management intervention. The plan uses a streamlined operational approach to identify and prioritize patient outreach, and focuses on working closely with patients and family/caregivers to close key gaps in education, self-management, and available resources. Personalized case management is combined with medical necessity review, ongoing delivery of care monitoring, and continuous quality improvement activities to manage target patient groups.

Patients are discharged from active case management under specific circumstances, which many include stabilization of symptoms or a plateau in disease processes, the completed course of therapy, patient specific goals obtained; or the patient has been referred to Hospice. A patient's case may be re-initiated based on the identification of a transition in care, a change in risk score, or through a referral to case management.

How to Use Services

Patients that may benefit from case management are identified in multiple ways, including but not limited to: utilization management activities, predictive modeling, and direct referrals from a provider. If you would like to refer a patient for case management services, please call **1-888-501-1116**. In addition, our patients have access to information regarding the program via a brochure and website and may self-refer. Our case management staff contacts patients by telephone or face-to-face encounter. The patient has the right to opt out of the program. If the patient opts in, a letter will be sent to the patient and you as the provider. Once enrolled, an assessment is completed with the patient and a plan of care with goals, interventions, and needs is established.

Special Needs Plan

In 2008, CMS issued the final regulation “Medicare Improvements for Patients and Providers Act of 2008,” known as “MIPPA.” This regulation mandated that all Special Needs Plans have a filed and approved Model of Care by January 1, 2010. The Patient Protection and Affordable Care Act reinforced the importance of the SNP Model of Care as a fundamental component by requiring NCQA review and approval.

Special Needs Plan Eligibility Criteria

Special Needs Plans (SNPs) are designed for specific groups of customers with special health care needs. Only customers meeting the following criteria may join the SNP plan. CMS defined these SNP types as follows.

The three SNP specific groups are:

- Dual eligible SNP (D-SNP): (for individuals who eligible for Medicaid and Medicare)
- Chronic conditions SNP (C-SNP): for individuals with chronic conditions that are substantially disabling or life-threatening
- Institutional SNP (I-SNP): for individuals who reside in a long-term care facility

CMS mandates that each SNP type have a **Model of Care (MOC)**. The MOC is an evidenced-based care management program which facilitates the early and on-going assessments, the identification of health risks and major changes in the health status of SNP customers. The SNP MOC provides structure and describes the coordination of care and benefits and services targeted to improve the overall health of our SNP customers. The MOC also serves as also serves to ensure that the unique needs of our SNP customers are identified and appropriately addressed.

The SNP MOC identifies four key care management components:

- **SNP population** – provides a description of the unique characteristics of our overall and most vulnerable SNP customers.

- **Care coordination** – describes our SNP staff structure, the **Health Risk Assessment (HRA)**, **Individualized Care plan (ICP)**, **Interdisciplinary Care Team (ICT)** and Care Transition process, all of which identify the services and benefits offered through this plan and are available to our SNP customers. The wide range of services is targeted to help our SNP customers achieve their optimal health and improve the connection to care.
- **Provider Network** – describes the Specialized Expertise providers who participate in our SNP program, Clinical Practices guidelines, and Care Transition protocols. The SNP MOC Training is also addressed this section.
- **MOC Quality Measurement and Performance Improvement** – this section describes the quality improvement plan and identifies goals for the SNP population; this section of the MOC includes clinical and customer satisfaction goals, as well as on-going performance evaluation of the SNP MOC.

SNP MOC Process

The SNP MOC care management process focuses on the unique needs of our SNP customers. The MOC includes key program components, including conducting an initial and/or annual HRA, the development of an ICP by the ICT team and with a change in the health status, performing Care Transition coordination. These benefits and services are provided to ensure appropriate care coordination and care management. The IPA also utilizes risk stratification methodology to identify our most vulnerable SNP customers. These members include those who are frail/disabled, customers with multiple chronic illnesses and those at the end of life. The risk stratification process includes input from the provider, customer, and data analysis. The goal is to identify interventions, care coordination and care transitions needs, barriers to care, education, early detection, and symptom management.

- **Health Risk Assessment (HRA)** – Health plan will conduct an HRA to identify care needs. SNP customers will have a Health Risk Assessment (HRA) completed within 90 days of enrollment and then annually, within 365 days of the last HRA.
- **Individualized Care Plan (ICP)** – HRA results and evidence-based clinical protocols are utilized to develop an ICP. The Interdisciplinary Care Team is responsible for the development of an ICP.
- **Interdisciplinary Care Team** – An ICT is composed of key stakeholders, including the PCP and case managers. The ICT help to develop the ICP.
 - Primary Care Providers (PCPs) who treat SNP customers are core participants of the Interdisciplinary Care Team (ICT) as they are the primary care giver. However, ICT participants can also include practitioners of various disciplines and specialties, based on the customer's individual needs. The customer may participate in the ICT meetings, as may health care providers.
- **Care Transition** – a change in health status could result in new care management needs. As a result, our case management teams provide support to address the specific needs of our SNP population.

As a provider, your participation is required for the coordination of care, care plan management and in identifying additional health care needs for our Special Needs program customers.

PCP – Your Participation is Needed at the ICT Meetings.

The IPA case manager will invite you to participate in an ICT meeting when your SNP customer requires care management. We encourage you to participate in the ICT meeting and to collaborate in the care planning and identification of care plan goals for your SNP customer. SNP programs are geared support our customers and you by providing the benefits and services required and by supporting care management and customer goal self-management. Additionally, care transitions, whether planned or unplanned, are monitored, and PCPs are informed accordingly. PCP communication to promote continuity of care and ICT involvement is a critical aspect of care transitions protocols.

Implementation of the SNP Model of Care is supported through feedback from you, as well as systems and information sharing between the health plan, health care providers and the customer. The SNP Model of Care includes periodic analysis of effectiveness, and all activities are supported by the Stars & Quality department.

SNP Contact Information:

When a SNP customer completes a Health Risk Assessment (HRA), a care plan is generated. A copy of the HRA can be obtained by calling: our Health Risk Assessment department at **1-800-331-6769** based on the HRA responses. The customer and assigned PCP will receive a copy of the customer's care plan. A copy of the HRA can be obtained by calling: our Health Risk Assessment department at **1-800-331-6769**. To discuss and/or request a copy of the care plan, refer an SNP customer for an Interdisciplinary Care Team meeting or to participate in an Interdisciplinary Care Team meeting at **1-888-501-1116**.

Behavioral Health

The Health plan provides comprehensive behavioral health and substance abuse treatment coverage to its patients. Its goal is to treat the patient in the most appropriate, least restrictive level of care possible, and to maintain and/or increase functionality.

The Participating Plan's network is comprised of behavioral health and substance abuse treatment services and providers who identify and treat patients with behavioral health care needs.

Integration and communication among behavioral health and physical health providers is most important. The Health plan encourages and facilitates the exchange of information between and among physical and behavioral health providers. Patient follow-up is essential. High risk patients are evaluated and encouraged to participate in Participating Plan's behavioral health focused case management program where education, care coordination, and support is provided to increase patient's knowledge and encourage compliance with treatment and medications. The Health plan works with its providers to become part of the strategy and the solution to provide quality behavioral health services.

Behavioral Health Services

Behavioral Health services are available and provided for the early detection, prevention, treatment, and maintenance of the patient's behavioral health care needs. Behavioral health services are interdisciplinary and multidisciplinary: a patient may need one or multiple types of behavioral health providers, and the exchange of information among these providers is essential. Behavioral health and substance abuse treatment benefits cover the continuum of care from the least restrictive outpatient levels of care to the most restrictive inpatient levels of care.

Behavioral Health services include:

- Access to Participating Plan's customer Service for orientation and guidance.
- Routine outpatient services to include psychiatrist, addictionologist, licensed psychologist and LCSWs, and psychiatric nurse practitioners. PCPs may provide behavioral health services within his/her scope of practice.
- Initial evaluation and assessment.
- Individual and group therapy.
- Psychological testing according to established guidelines and needs.
- Inpatient hospitalization.
- Medication management.
- Partial hospitalization programs.

Responsibilities of Behavioral Health Providers

The Health plan encourages behavioral health providers to become part of its network. Their responsibilities include but are not limited to:

- Provide treatment in accordance with accepted standards of care.
- Provide treatment in the least restrictive level of care possible.
- Communicate on a regular basis with other medical and behavioral health practitioners who are treating or need to treat the patient.
- Direct patients to community resources as needed to maintain or increase patient's functionality and ability to remain in the community.

Responsibilities of the Primary Care Physician

The PCP can participate in the identification and treatment of their patient's behavioral health needs. His/her responsibilities include:

- Screening and early identification of behavioral health and substance abuse issues.
- Treating patients with behavioral health care needs within the scope of his/her practice and according to established clinical guidelines. These can be patients with co-morbid physical and minor behavioral health problems or those patients refusing to access a behavioral health or substance abuse provider, but requiring treatment.
- Consultation and/or referral of complex behavioral health patients or those not responding to treatment.
- Communication with other physical and behavioral health providers on a regular basis.

Patient Access to Behavioral Health Services

Patients may access behavioral health services as needed:

- Patients may self-refer to any in-network behavioral health provider for initial assessment and evaluation, and ongoing outpatient treatment.
- Patients may access their PCP and discuss their behavioral health care needs or concerns and receive treatment that is within their PCP's scope of practice. They may request a referral to a behavioral health practitioner. Referrals however, are not required to receive most in-network behavioral health or substance abuse treatment services.
- Patients and providers can call the Participating Plan's Behavioral Health Patient Service to receive orientation on how to access behavioral health services, provider information, and prior authorizations. (See Quick Reference Guide for phone numbers in the Appendix.)

Medical Record Documentation

When requesting prior authorization for specific services or billing for services provided, behavioral health providers must use the DSM-IV multi-axial classification system and document a complete diagnosis. The provision of behavioral health services require progress note documentation that correspond with day of treatment, the development of a treatment plan, and discharge plan as applicable for each patient in treatment.

Continuity of Care

Continuity of Care is essential to maintain patient stability. Behavioral health practitioners and PCPs, as applicable, are required to:

- Evaluate patient if he/she was hospitalized for a behavioral health condition within 7 days post-discharge.
- Provide patients receiving care with contact information for any emergency or urgent matter arising that necessitates communication between the patient and the provider.
- Evaluate patient needs when the patient is in acute distress.
- Communicate with the patient's other health care providers.
- Identify those patients necessitating follow-up and refer to Participating Plan's behavioral health focused case management program as necessary.
- Discuss cases as needed with a peer reviewer.
- Make request to Health plan for authorization for patient in an active course of treatment with a non-participating practitioner.

Utilization Management

The Participating Plan's Health Services Department coordinates behavioral health care services to ensure appropriate utilization of behavioral health and substance abuse treatment resources. This coordination assures promotion of the delivery of services in a quality-oriented, timely, clinically-appropriate, and cost-effective manner for the patients.

The Participating Plan's Utilization Management staff base their utilization-related decisions on the clinical needs of patients, the patient's Benefit Plan,

Interqual Criteria, MCG Care Guideline, the appropriateness of care, Medicare National Coverage Guidelines, health care objectives, and scientifically-based clinical criteria and treatment guidelines in the context of provider and/or patient-supplied clinical information and other relevant information. For requests for behavioral health services that require authorization, the Health plan will approve the request or issue a notice of denial if the request is not medically necessary.

Concurrent Review

Concurrent Review is the process of initial assessment and continual reassessment of the medical necessity and appropriateness of inpatient care during an acute care hospital admission, rehabilitation admission or skilled nursing facility or other inpatient admission in order to ensure:

- Covered services are being provided at the appropriate level of care;
- And, services are being administered according to the individual facility contract.

The Health plan requires admission notification for the following:

- Elective admissions
- ER and Urgent admissions
- Transfers to Acute Rehabilitation, LTAC and SNF admissions
- ***These levels of care require pre- authorization***
- Admissions following outpatient procedures or observation status
- Observation status
- Newborns remaining in the hospital after the mother is discharged.

Emergent or urgent admission notification must be received within twenty-four (24) hours of admission or next business day, whichever is later, even when the admission was prescheduled. If the patient's condition is unstable and the facility is unable to determine coverage information, Health plan requests notification as soon as it is determined, including an explanation of the extenuating circumstances. Timely receipt of clinical information supports the care coordination process to evaluate and communicate vital information to hospital professionals and discharge planners. Failure to comply with notification timelines or failure to provide timely clinical documentation to support admission or continued stay could result in an adverse determination.

The Participating Plan's Health Services department complies with individual facility contract requirements for concurrent review decisions and timeframes. The Participating Plan's nurses, utilizing CMS guidelines and nationally accepted, evidence-based review criteria, will conduct medical necessity review. The Health plan is responsible for final authorization.

Participating Plan's preferred method for concurrent review is a live dialogue between our Concurrent Review nursing staff and the facility's UM staff within 24 hours of notification or on the last covered day. If clinical information is not received within 72 hours of admission or last covered day, the case will be reviewed for medical necessity with the information health plan has available. If it is not feasible for the facility to contact health plan via phone, facilities may fax the patient's clinical information within 24 hours of notification to **1-832-553-3420**. Skilled Nursing Facility (SNF) Reviews should be faxed to **1-713-437-3130**. For SNF admission requests, a recent PM&R or physical, occupational and/or speech therapy consult is requested along with the most recent notes for therapy(ies) or recent medical status and expected skilled treatment and service requirements.

Following an initial determination, the concurrent review nurse will request additional updates from the facility on a case-by-case basis. The health plan will render a determination within 24 hours of receipt of complete clinical information. Participating Plan's nurse will make every attempt to collaborate with the facility's utilization or case management staff and request additional clinical information in order to provide a favorable determination. Clinical update information should be received 24 hours prior to the next review date.

The health plan's Medical Director reviews all acute, rehab, LTAC, and SNF confinements that do not meet medical necessity criteria and issues a determination. If the health plan's Medical Director deems that the inpatient or SNF confinement does not meet medical necessity criteria, the Medical Director will issue an adverse determination (a denial). The Concurrent Review nurse or designee will notify the provider(s) e.g. facility, attending/ordering provider verbally and in writing of the adverse determination via notice of denial. The criteria used for the determination is available to the practitioner/facility upon request. To request a copy of the criteria on which a decision is made, call **1-832-553-3333**.

In those instances where the attending provider does not agree with the determination, the provider is encouraged to contact Participating Plan's Medical Director for Peer-to-Peer discussion. The telephone number to contact our Medical Director for the discussion call is **1-832-553-3333**.

Following the Peer-to-Peer discussion, the Medical Director will either reverse the original determination and authorize the confinement or uphold the adverse determination.

For patients receiving hospital care and for those who transfer to a Skilled Nursing Facility or Acute Inpatient Rehabilitation Care, the health plan will approve the request or issue a notice of denial if the request is not medically necessary. The health plan will also issue a notice of denial if a patient who is already receiving care in an Acute Inpatient Rehabilitation Facility has been determined to no longer require further treatment at that level of care. This document will include information on the patients' or their Representatives' right to file an expedited appeal, as well as instructions on how to do so if the patient or patient's physician does not believe the denial is appropriate.

The health plan also issues written Notice of Medicare Non-Coverage (NOMNC) determinations in accordance with CMS guidelines. This notice will be sent by fax to the SNF or HHA.

The facility is responsible for delivering the notice to the patient or their authorized representative/power of attorney (POA) and for having the patient, authorized representative or POA sign the notice within the written time frame listed in the Adverse Determination section of the provider manual. The facility is requested and expected to fax a copy of the signed NOMNC back to Health Services at the number provided. The NOMNC includes information on patients' rights to file a fast track appeal.

Readmission

The Health Services Department will review all readmissions occurring within 31 days following discharge from the same facility, according to established processes, to assure services are medically reasonable and necessary, with the goal of high quality cost effective health care services for health plan patients.

The Health Services Utilization Management (UM) staff will review acute Inpatient and Observation readmissions. If admissions are determined to be related; they may follow the established processes to combine the two confinements.

The Role of the ACCM (Acute Care Case Manager)

Health plan Acute Care case managers (ACCMs) are registered nurses. All ACCMs are expected to perform at the height of their license. They understand Participating Plan's plan benefits and utilize good clinical judgment to ensure the best outcome for the patient.

The Acute Care Case Manager has two major functions:

- Ensure the patient is at the appropriate level of care, in the appropriate setting, at the appropriate time through utilization review.
- Effectively manage care transitions and length of stay (LOS).

Utilization review is performed utilizing evidence-based guidelines (Interqual) and collaborating with Primary Care Physicians (PCP), attending physicians, and Participating Plan's Medical Directors. The ACCM effectively manages all transitions of care through accurate discharge planning and collaboration with facility personnel to prevent unplanned transitions and readmissions via interventions such as:

- Medication reconciliation.
- Referral of patients to Participating Plan's programs such as: CHF CCIP Program, Respiratory Care Program, and Fragile Fracture Program.
- Appropriate coordination of patient benefits.
- Obtaining needed authorizations for post-acute care services or medications.
- Collaborating with attending physician and PCP, as needed.

- Introducing and initiating CTI (Care Transition Intervention).
- Addressing STAR measures, as applicable: Hgb A1C and foot care, LDL, colorectal cancer screening, osteoporosis management in women who had a fracture, falls, emotional health, flu and pneumonia vaccines and medication adherence.
- Facilitating communication of care level changes to all parties.
- The goals of the ACCM are aligned with the goals of acute care facilities.
- Patients/patients receive the appropriate care, at the appropriate time, and in the most appropriate setting.
- Readmissions are reduced and LOS is managed effectively.

We strive for Primary Care Physicians (PCP), attending physicians, and acute care facility personnel to view the Participating Plan's ACCM as a trusted resource and partner in the care of our patients (your patients).

Fraud, Waste, and Abuse

In order to protect Medicare trust funds from fraud, waste and abuse, to ensure Part D drugs are prescribed only by qualified suppliers, and to follow the recommendations from the Office of Inspector General (OIG); the Centers for Medicare & Medicaid Services (CMS) proposed changes to the Medicare participation requirements related to Drug Enforcement Administration (DEA) certification of registration.

Pharmacy Prescription Benefit

Part D Drug Formulary

Formulary listings, utilization management criteria, and formulary changes for formularies can be found at: <http://www.cigna.com/medicare/resources/drug-list-formulary>.

The health plan utilizes the USP classification system to develop Part D drug formularies that include drug categories and classes covering all disease states. Each category must include at least two drugs, unless only one drug is available for a particular category or class. The health plan includes all or substantially all drugs in protected classes, as defined by CMS. All formularies are reviewed for clinical appropriateness by the health plan's Pharmacy and Therapeutics (P&T) Committee, including the utilization management edits placed on formulary products. Health plan submits all formulary changes to CMS according to the timelines designated by CMS.

A Part D drug is a drug that meets the following criteria:

- may be dispensed only by prescription
- is approved by the FDA
- is used and sold in the US; is used for a medically accepted indication

- includes FDA-approved uses; includes uses approved for inclusion in the American Hospital Formulary Service Drug Information (AHFS DI), Micromedex, National Comprehensive Cancer Network (NCCN), Clinical Pharmacology, plus other authoritative compendia that the Secretary of Health and Human Services identifies, off-label uses described in peer-reviewed literature are insufficient on their own to establish a medically accepted indication
- includes prescription drugs, biologic products, vaccines that are reasonable and necessary for the prevention of illness, insulin, and medical supplies associated with insulin that are not covered under Parts A or B (syringes, needles, alcohol, swabs, gauze, and insulin delivery systems).

Drugs excluded under Part D include the following:

- drugs for which payment as so prescribed or administered to an individual is available for that individual under Part A or Part B
- drugs or classes of drugs, or their medical uses, which may be excluded from coverage or otherwise restricted under Medicaid (with the exception of smoking cessation products)
- drugs for anorexia, weight loss or weight gain; drugs to promote fertility
- drugs for cosmetic purposes and hair growth; drugs for symptomatic relief of coughs and colds
- vitamins and minerals (except for prenatal vitamins and fluoride preparations)
- non-prescription drugs
- outpatient prescriptions for which manufacturers require the purchase of associated tests or monitoring services as a condition for getting the prescription (manufacturer tying arrangements)
- agents used for treatment of sexual or erectile dysfunction (ED) (except when prescribed for medically-accepted indications such as pulmonary hypertension)

Part D Utilization Management

Health plan's formularies include utilization management requirements that include prior authorization, step therapy and quantity limits.

- **Prior Authorization (PA):** For a select group of drugs, the health plan requires the patient or their physician to get approval for certain prescription drugs before the patient is able to have the prescription covered at their pharmacy.
- **Step Therapy (ST):** For a select group of drugs, the health plan requires the patient to first try certain drugs to treat their medical condition before covering another drug for that condition.
- **Quantity Limits (QL):** For a select group of drugs, the health plan limits the amount of the drug that will be covered without prior approval.

The Centers for Medicare & Medicaid Services (CMS), in collaboration with the Pharmacy Quality Alliance (PQA), has identified certain medications as high risk when used in the elderly. This list is based upon the American Geriatrics Society (AGS) 2012 Updated Beers Criteria. All medications on the list are ones for which the AGS Expert Panel strongly recommends avoiding use of the medication in older adults.

Use of these medications in the elderly may result in increased rates of adverse drug events, potential drug toxicity, and an increased risk of falls and/or fractures. Due to these safety concerns, the health plan requires prior authorization for these medications in all patients aged 65 and older in order to confirm that the benefits outweigh the risks, and that safer alternatives cannot be used.

How to file a Coverage Determination

A Coverage Determination (CD) is any decision that is made by or on behalf of a Part D plan sponsor regarding payment or benefits to which an enrollee believes he or she is entitled. Coverage Determinations may be received orally or in writing from the patient's prescribing physicians.

For the Provider Call Center, please call **1-877-813-5595** or fax **1-866-845-7267**.

The mailing address is:

Coverage Determination & Exceptions
PO Box 20002
Nashville, TN 37202

The Provider Call Center is open from 7 a.m. CST to 8 p.m. CST Monday through Friday. Any call received after 8 p.m. CST will be routed to a voicemail box and processed daily.

To ensure timely review of a CD and that the prescriber is aware of what requires for the most commonly requested drugs, forms are available online at www.cigna.com/medicare/resources/drug-prior-authorization or by requesting a fax when calling **1-877-813-5595**.

A provider will receive the outcome of a Coverage Determination by fax no later than seventy-two (72) hours after receipt for standard requests or receipt of the supporting statement and no later than twenty-four (24) hours after receipt for urgent requests or receipt of the supporting statement.

The following information will be provided:

- the specific reason for the denial taking into account the patient's medical condition, disabilities and special language requirements, if any
- information regarding the right to appoint a representative to file an appeal on the patient's behalf
- a description of both the standard and expedited redetermination processes and timeframes including conditions for obtaining an expedited redetermination and the appeals process.

The fax cover sheet includes the peer-to-peer process if a provider has questions and wants to review with a clinical pharmacist.

How to file a Part D Appeal

A Part D appeal can be filed within 60 calendar days after the date of the Coverage Determination decision, if unfavorable. The health plan will ask for a statement and select medical records from the prescriber if a patient requests a Part D appeal. For an expedited appeal, the health plan will provide a decision no later than seventy-two (72) hours after receiving the appeal, and for a standard appeal, the timeframe is seven (7) days. If the request is regarding payment for a prescription drug the patient already received, an expedited appeal is not permitted.

Part D Appeals may be received orally or in writing from the patient's prescribing physicians by calling **1-866-845-6962** or fax **1-866-593-4482**.

The mailing address is:

Part D Appeals

PO Box 24207

Nashville, TN 37202-9910

The DEA implements and enforces the Controlled Substances Act (CSA). The CSA makes possession of authority under state law to dispense controlled substances a requirement for both obtaining and maintaining a DEA certificate of registration. CMS equates a DEA certificate of registration to prescribe controlled substances as similar to a state's requirement that a physician or eligible professional be licensed or certified by the state to furnish health care services. To ensure additional controls are in place to protect the Medicare trust funds from any fraud, waste and abuse the following changes were finalized:

- Granting CMS the authority to deny a physician or eligible professional's Medicare enrollment application if: (1) his or her DEA certificate is currently suspended or revoked; or (2) the applicable licensing or administrative body for any state in which the physician or eligible professional practices has suspended or revoked the physician or eligible professional's ability to prescribe drugs, and such suspension or revocation is in effect on the date he or she submits his or her enrollment application to the Medicare contractor.
- Granting CMS the authority to revoke a physician or eligible professional's Medicare enrollment if: (1) his or her DEA certificate is suspended or revoked; or (2) the applicable licensing or administrative body for any state in which the physician or eligible professional practices suspends or revokes his or her ability to prescribe drugs.

CMS considers the loss of the ability to prescribe drugs, via a suspension or revocation of a DEA certificate or by state action, a clear indicator that a physician or eligible professional may be misusing or abusing his or her authority to prescribe such substances. These changes are consistent with the CMS requirement that suppliers maintain compliance with all applicable licensure and certification requirements.



BEHAVIORAL HEALTH SERVICES QUICK FACTS AND PHONE GUIDE

Cigna Medicare Advantage is committed to providing our customers with the highest quality and greatest value in healthcare benefits and services. Managing the behavioral health benefits of our customers allows Cigna Medicare Advantage the opportunity to demonstrate this commitment by recognizing overall needs and providing better care.

Cigna Medicare Advantage will continue to offer the outpatient services listed below without the requirement of a prior authorization. Any service not listed will continue to utilize the standard authorization process.

Services Requiring No Authorization by Participating Provider

CPT Code	DESCRIPTION	Report with Psychotherapy Add-On Codes
90791	Psychiatric diagnostic evaluation (no medical services)	
90792 (or New Patient E & M codes)	Psychiatric diagnostic evaluation with medical services	
<u>Outpatient</u> 99201-99205 99211-99215	New Patient Visit (10-60 min) Established Patient (5-25 min)	Psychotherapy Add On Codes: (when appropriate) 90833-30 min 90836-45 min 90838-60 min
<u>Nursing Facility</u> 9304-99306 99307-99310	New Patient Visit (10-45 min) Established Patient (10-35 min)	
90832	Psychotherapy (30 min)	
90834	Psychotherapy (45 min)	
90837	Psychotherapy (60 min)	
90846	Family Psychotherapy (without patient present)	
90847	Family Psychotherapy (with patient present)	
90853	Group Psychotherapy (other than of a multiple-family group) <i>Physicians Office Only ~ Facilities Require Prior Authorization.</i>	
Q3014	Telehealth	
FUNCTION	PHONE/ADDRESS	DESCRIPTION OF SERVICES
Customer Eligibility/Benefits	800-230-6138	Verification of coverage and benefits; for facility admissions and other facility services, consult the Common Working File if customer does present ID card.
Authorization Line	866-780-8546 Fax: 866-949-4846	Prior authorization is required for services not listed above.
Inpatient Admissions	866-780-8546 Fax: 866-949-4846	Notification is required within 24 hours of admissions; clinical staff available 24 hrs a day/7 days a week to assist with notifications and precertification.

Claims Submission (paper)	Cigna MA Claims Department P.O. Box 981706 El Paso, TX 79998-1706	
Claims Submission (electronic)	Emdeon Payer ID: 63092 or 52192 SSI Group Payer ID: 63092 Availity Payer ID: 63092 or 52192 Proxymed Payer ID: 63092	
	Medasets Payer ID: 63092 Zirmed Payer ID: 63092 Office Ally Payer ID: 63092 GatewayEDI Payer ID: 63092 Relay Health Professional claims CPID: 2795 or 3839 Institutional claims CPID: 1556 or 1978	
Claim Status Inquires	800-230-6138	
HSConnect	www.hsconnectonline.com	Access to on-line provider portal for verification of member eligibility, authorization, and claim payment review. Select Providers tab, then HSConnect to access portal.
Demographic Updates	www.CignaforHCP.com	If the provider does not have web access, they may contact Cigna Behavioral Health (CBH) Provider Services at 1-800-926- 2273
Medical Management Program (formerly referred to as: Provider Manual)	www.CignaforHCP.com	If the provider does not have web access, they may contact Cigna Behavioral Health (CBH) Provider Services at 1-800-926-2273
Contract Questions	www.CignaforHCP.com	If the provider does not have web access, they may contact Cigna Behavioral Health (CBH) Provider Services at 1-800-926-2273
Interested in Joining Cigna Behavioral Health Network	www.CignaforHCP.com	Follow: Join the Cigna Network > Behavioral > Cigna Behavioral Health Provider Application

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Appendix

I. IPA Harassment Policy

It is the policy of the IPA that all persons affiliated with the IPA, either as a physician or as an independent contractor or vendor have an unconditional right to work in an environment free from harassment perpetrated by member physicians, independent contractors and/or vendors and their employees.

Harassment

The following conduct constitutes prohibited harassment within the meaning or coverage of this policy.

Sexual Harassment: Prohibited sexual harassment includes any sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when:

- ♦ Submission to such conduct is an explicit or implicit condition of employment;
- ♦ Submission to or rejection of such conduct is used as the basis for employment decisions;
- ♦ Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance, or creating an intimidating, hostile or offensive work environment; or
- ♦ Such conduct otherwise adversely affects an individual's employment opportunities.

Verbal Harassment: Prohibited verbal harassment includes any verbal conduct of a sexual, obscene, vulgar or general nature when such conduct serves to belittle, show hostility, or ridicule an individual because of race, gender, color, religion, national origin, age, or disability, when such conduct:

- ♦ Has the purpose or effect of creating an intimidating, hostile or offensive working environment;
- ♦ Has the purpose or effect of unreasonably interfering with an individual's work performance; or
- ♦ Otherwise adversely affects an individual's employment opportunities.

Other Prohibited Harassment: Other forms of prohibited harassment include any physical conduct that

- ♦ Has the purpose or effect of creating an intimidating, hostile or offensive working environment;
- ♦ Has the purpose or effect of unreasonably interfering with an individual's work performance; or
- ♦ Otherwise adversely affects an individual's employment opportunities.

Reporting Harassment

In the event that you are the victim of any of the behaviors described above, or witness anyone engaging in any such behaviors, you must report the incident *immediately*. To report violations of this policy, please contact one of the following persons:

- ♦ Member of the IPA Board (if such is appropriate)
- ♦ Member of the IPA Board (if such is appropriate)
- ♦ Legal Counsel
- ♦ Vendor Representative (if such is appropriate)

To ensure that The IPA handles each matter with consistency, the Chairman of the IPA Board will be informed of all reports of harassment, unless the circumstances of the complaint require otherwise.

Investigation of Harassment

Reports of harassment will be treated seriously and an investigation will be initiated promptly. To the extent possible, confidentiality will be maintained.

Disciplinary Measures

Where an investigation reveals that the allegations of harassment are true, appropriate remedial action, including discipline, will be taken. All disciplinary measures will be implemented promptly and shall be commensurate with the person's conduct. The remedies vary depending on the entire facts and circumstances found by the investigation. However in the event such conduct is perpetrated by a participating physician such conduct may be the basis for an immediate termination of the physician's contractual relationship with The IPA.

Harassment by Customers and Vendors

The IPA recognizes that harassment can also be perpetrated by a customer, vendor, or employee of a vendor of The IPA. Should this occur, the reporting and investigation procedures discussed above will be followed. Where the investigation reveals that allegations of harassment are true, The IPA will undertake appropriate measures to end such harassment.

Right to Appeal

If, after an investigation is completed or remedial action is recommended, a victim of alleged harassment or the alleged perpetrator may appeal the investigative findings or proposed remedial action to the IPA Board.

Continued Harassment, Nondiscrimination and Retaliation

If, following remedial action, the harassment continues, the victim should report the recurrence of the conduct in accordance with the procedures in this policy, and The IPA will take all additional remedial measures necessary to end the conduct. The IPA does not discriminate or retaliate against any person who reports a violation of this policy or participates in an investigation of a complaint regarding harassment.

II. Advance Directive for Healthcare

The Federal Patient Self-Determination Act grants customers the right to participate in health care decision-making, including decisions about withholding resuscitative services or declining/withdrawing life sustaining treatment. In accordance with guidelines established by the Centers for Medicare & Medicaid Services (CMS), and our own policies and procedures, Cigna requires all Participating Providers to have a process in place pursuant to the intent of the Patient Self Determination Act.

All providers contracted directly or indirectly with Cigna may be informed by the customer that the customer has executed, changed or revoked an advance directive. At the time a service is provided, the provider should ask the customer to provide a copy of the advance directive to be included in his/her medical record.

Providers are required to document in a prominent place of a customer's medical record whether the customer has executed an advanced directive.

If the Primary Care Physician (PCP) and/or treating provider cannot as a matter of conscience fulfill the customer's written advance directive, he/she must inform the customer and Cigna. Cigna and the PCP and/or treating provider will arrange for a transfer of care. Participating Providers may not condition the provision of care or otherwise discriminate against an individual based on whether the individual has executed an advance directive. However, nothing in The Patient Self-Determination Act precludes the right under state law of a provider to refuse to comply with an advance directive as a matter of conscience.

To ensure providers maintain the required processes to advance directives, Cigna conducts periodic customer medical record reviews to confirm that required documentation exists.

Texas state forms in English and Spanish can be found on the Texas Health and Human Services website: <https://hhs.texas.gov/laws-regulations/forms/advance-directives>