

# HCPF IMD Forum

Monthly on the Last Thursday of each month – 2 PM

# Forum Agenda 8/31/2023

Introduction & Welcome.....5 Minutes

7/28/23 Forum Discussion Summary.....5 Minutes

RAE Denials Data review and discussion .....20 Minutes

Judicial Barriers/Court-Ordered Medical related delay discussion.....20 Minutes

Open Discussion on next steps & Wrap-up.....10 Minutes

# 7/28 Discussion Summary

During our initial meeting, HCPF staff reviewed the results of our IMD Risk Mitigation research project led by HMA. This report highlighted several issues that could be addressed by our forum with Colorado IMDs. Please review the HMA report posted on the IMD Webpage for additional details. Of the 9 challenges we reviewed, providers identified the following 4 as top priorities:

1. RAE Denials Data
2. Court ordered medication delays
3. Mental Health Hospital admission delays
4. Continuum of Care access issues re: Step Down beds

Today's meeting will continue the discussion on the first 2 topics.

# Barriers Identified

- ☐ Awaiting State Hospital Beds
- ☐ Patient Acuity
- ☐ Admission in another facility in same month
- ✓ Delays in Court Ordered Medication
- ☐ Continuum of care access issues
- ☐ Care transition challenges/ housing instability
- ✓ Inconsistent application of Medical Necessity Criteria (RAE Denials Data)
- ☐ Timely filing limits
- ☐ Denials of Authorization to lower level of care

# RAE Denials Data

## IMD Decisions by RAE

March 2021 to March 2023

Specified by denial type

RAE Denials Data collected and compiled  
by HCPF Data Analyst

RAE	Decision Status	Description	% Denied Decisions
Grand Total			9.19%
Region 1	Total		18.45%
	Denied	Administrative Denial	0.90%
		Not a Covered Benefit/Diagnosis	1.64%
		Not Medically Necessary	15.92%
Region 2	Total		6.39%
	Denied	Administrative Denial	3.72%
		Not a Covered Benefit/Diagnosis	0.05%
		Not Medically Necessary	2.62%
Region 3	Total		6.80%
	Denied	Administrative Denial	0.55%
		Not a Covered Benefit/Diagnosis	0.06%
		Not Medically Necessary	6.19%
Region 4	Total		9.14%
	Denied	Administrative Denial	6.10%
		Not a Covered Benefit/Diagnosis	0.06%
		Not Medically Necessary	2.98%
Region 5	Total		5.84%
	Denied	Administrative Denial	0.46%
		Not Medically Necessary	5.37%
Region 6	Total		13.54%
	Denied	Administrative Denial	1.85%
		Not Medically Necessary	11.70%
Region 7	Total		7.88%
	Denied	Administrative Denial	1.03%
		Not a Covered Benefit/Diagnosis	0.09%
		Not Medically Necessary	6.76%
Denver Health	Total		5.66%
	Denied	Administrative Denial	0.51%
	Denied	Not Medically Necessary	5.14%

# RAE Denials Data

- Data was collected and compared for overall denials rates, IMD medical-necessity denials, and non-IMD denials

\*March 2021 to March 2023

RAE	Overall Denial Rate	IMD - MN Denial Rate	Non-IMD - MN Denial Rate
<b>Grand Total</b>	<b>9.19%</b>	<b>7.24%</b>	<b>3.72%</b>
Region 1	18.45%	15.92%	N/A
Region 2	6.39%	2.62%	N/A
Region 3	6.80%	6.19%	3.93%
Region 4	9.14%	2.98%	N/A
Region 5	5.84%	5.37%	3.04%
Region 6	13.54%	11.70%	3.77%
Region 7	7.88%	6.76%	4.88%
Denver Health	5.66%	5.14%	3.42%

Regions 1, 2, and 4 did not have any Non-IMD Provider data available between March 2021 and March 2023, resulting in N/A for MN Denial Rate.

# RAE IMD Stay Data

*Data on members with multiple facility stays in one month currently being compiled and will be available at a future forum*

Stays Exceeding 15 Days March 2021 to March 2023	
RAE	% of Stays Exceeding 15 Days
Grand Total	2.52%
Region 1	3.11%
Region 2	3.02%
Region 3	3.76%
Region 4	3.56%
Region 5	4.40%
Region 6	1.95%
Region 7	1.11%
Denver Health	3.78%

# Judicial Barriers

HMA Identified the following data (total numbers for calendar year 2020):

	IMD #1	IMD #2	IMD #3	IMD #4	IMD#5
Delays in court-ordered medication	0	Not reported	4 stays 136 days	12 stays 300 days	10 stays 333 days

- This represents an average of approximately 30-day LOS when a member experiences COM delay.

We would like to consider the following questions:

- Does this data accurately reflect what the facilities are experiencing?
- What counties seem to have the highest delays? What counties have the least delays?
- Does anyone have any policies or procedures to share that seem to have improved this issue at their facility?

# HCPF Follow-Up Plan

HCPF has launched an internal State-level exploratory committee to engage in information gathering and building possible solutions surrounding the challenges of Court-Ordered Medications. This team will be meeting monthly.

[Danielle.McKibbin@state.co.us](mailto:Danielle.McKibbin@state.co.us) is available to answer additional questions.

Information that may be helpful to the committee:

- An overview on each facility's policy regarding petitions for Court Ordered Medications
- Reviews of example cases in which a patient's stay was extended due to COM issues
  - To determine where delays are specifically happening
- Would a Learning Collaborative hosted by the State be helpful to IMD facilities on this issue?
- If the state were to consider a centralized process – how many patients would this involve each month?

# RAE Open Discussion

- Additional Topics from our RAEs for discussion?
  - Retroactive Enrollment Process

# Discussion and Wrap-Up

What additional context would anyone like to add on today's overview?

What additional actions need to be completed for the September forum?

# Next Time....

1. Continued discussion of today's topics
2. Continuum of Care access issues re: Step Down beds
3. Mental Health Hospital admission delays

# Discussion Notes

- Forum participants discussed the IMD Denial rates data presented.
  - This data was provided by HCPF and blinded to meet appropriate HIPAA compliance.
  - The September forum will include an opportunity for further discussion on IMD denials data
- Forum participants discussed their experiences with Court Ordered Medication involved delays at their facilities
  - Participants discussed potentially providing HIPAA compliant, blinded information on these processes for several months to create a fuller picture of the scope and breadth of this concern.
  - Clarification was requested on policies/requirements at a State and County level
  - Forum participants will be connected to Danielle McKibbin who is facilitating a cross-agency exploratory committee.
- The September forum will include further opportunities to discuss today's topics as well as:
  - Continuum of Care access concerns
  - Challenges surrounding admissions to Colorado State Mental Health Hospitals.

# Action Items

☐ HCPF will communicate further follow-up actions to the IMD Forum Participants via email

☐ IMD Forum participants should anticipate further follow up from Danielle McKibbin regarding information gathering requests on behalf of the State level COM exploratory committee

☐ September forum will include discussion on:

➤ Continuum of Care challenges

➤ Admission to Colorado State Mental Health Hospitals

We would like all forum participants to consider preparing information, data, or any other supplemental materials they feel would contribute to these discussion.



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