Appendices

Appendices A through O present each NQTL, the member scenarios, benefit categories (IP - Inpatient; OP - Outpatient; EC – Emergency Care; PD – Prescription Drugs), a comparative analysis of the policies and procedures applied to the MH/SUD and M/S benefits in the identified member scenario, and whether or not compliance was determined. Appendix O presents the Availability of Information analysis.

Appendix A – Prior Authorization

Description: Prior authorization review (PAR) requires a provider to submit a request before performing a service and may only render it after receiving approval. *Note that no emergency services require prior authorization.*

Tools for Analysis: Data request, interviews with health plan staff, and policies/procedures documents referencing utilization management policies, timelines for the processing of authorizations, documentation requirements, methods of document submission, and reviewer qualifications.

Summary of Results: The following table illustrates the characteristics of each scenario including health plans being compared, applicable benefit categories, whether differences were found in the analysis, and compliance finding.

	Used by	Benefit Categories	Differences between M/S and MH/SUD	Compliance Determined
Scenario 1	HCPF	IP, OP, PD	No	✓ Yes
Scenario 2	RMHP and Prime MCO	IP, OP, PD	No	✓ Yes
Scenario 3	RAE 1	IP, OP	Yes. See tables below.	✓ Yes
	RAE 2 and 4	IP, OP	Yes. See tables below.	✓ Yes
	RAE 3 and 5	IP, OP	Yes. See tables below.	✓ Yes
	RAE 6 and 7	IP, OP	Yes. See tables below.	✓ Yes
Scenario 4	Denver PIHP and Denver Health MCO	IP, OP, PD	Yes. See tables below.	✓ Yes

Results by Scenario: On the following pages, each scenario is expanded into an overview of primary policies that impact this NQTL.

Scenario 1: Prior Authorization

PRIOR AUTHORIZATION SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
Inpatient Services		
Process		
Are services in this classification subject to prior authorization?	No IP MH/SUD services are subject to PAR for admission or medical necessity. IP PAR is focused on facilitating hospital notification of RAEs to facilitate complex discharges. The procedure codes selected are related to codes HCPF has specific coverage criteria for. The APR-DRG and RAC systems function as a disincentive limiting inefficient services.[4]	No IP M/S services are subject to PAR for admission or medical necessity. IP PAR is focused on facilitating hospital notification of RAEs to facilitate complex discharges. The procedure codes selected are related to codes HCPF has specific coverage criteria for. The APR-DRG and RAC systems function as a disincentive limiting inefficient services.[5]
What is the maximum amount of time allowed to issue a determination on a prior authorization request?	1 business day.	1 business day.
Strategy		
Are prior authorization policies the same for both in-network and out-of-network providers?	Yes[6]	Yes[7]
Evidentiary Services		
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to determine whether to prior authorize inpatient services?	The FFS UM Vendor uses InterQual and MCG	The FFS UM Vendor uses InterQual and MCG

[4] HCPF's FFS does not utilize PARs for admissions due to the framework of an inpatient All-Patient Diagnosis Related Group (APR-DRG) based reimbursement system. Conducting PARs interferes with the existing Recovery Audit Contractor (RAC) system that systematically audits claims. The RAC system retrospectively identifies potential payment errors in areas such as duplicate payments, fiscal intermediaries' mistakes, medical necessity, and coding and determines if documentation supports the inpatient versus observation status. The RAC system replaces the function of an admission or medical necessity PAR through the retrospective audit creating a potential of non-payment to a provider. Furthermore, the APR-DRG's payment based upon an average length of stay creates a disincentive for inefficiency of services. For MH/SUD services, an authorization process that occurs at both admission to an inpatient setting, and on a concurrent basis to determine the need for continued length of stay, is necessary to ensure efficiency of services due to claims being paid on a per diem basis.

[5] Ibid

[6] The term in-network and out-of-network is not used by FFS UM since the ColoradoPAR program serves the entire state of Colorado and look at in-state and out-of-state (OOS) providers. Some border facilities are considered in-state. Both OOS and in-state providers need to be enrolled with Medicaid to bill for services and the authorization policies are the same.

[7] Ibid.

PRIOR AUTHORIZATION **SCENARIO 1: HCPF FFS**		
QUESTION	**MH/SUD**	**M/S**
Inpatient Services		
Does the plan use internally developed guidelines to determine whether to prior authorize services? IF YES: How frequently are those guidelines updated?	Yes, when no InterQual or MCG criteria is available. Reviewed regularly and updated as evidence/best practices change.	Yes, when no InterQual or MCG criteria is available. Reviewed regularly and updated as evidence/best practices change.

Prior Authorization

Findings: Scenario 1 – Inpatient Services

The goals of Colorado Medicaid's Utilization Management Program are to improve members' quality of care and ensure members are receiving the right service at the right time for the right duration in the right setting.

The inpatient prior authorization policies and procedures regarding exception policies, determination timeframes, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services are the same as the policies and procedures of M/S services and follow standard industry practice. IP PAR for both MH/SUD and M/S is the same and is focused on facilitating hospital notification of the RAEs to facilitate complex discharges.

It is determined that these policies and procedures are parity compliant.

PRIOR AUTHORIZATION SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
Outpatient Services		
Process		
Are services in this classification subject to prior authorization?	PAR is only required for OP pediatric behavioral therapy (PBT) services.	There are thousands of codes that require PAR, including conditional PAR requirements.[8] Some conditional PAR requirements exist where in certain circumstances a PAR would not be needed (ie: diapers under unit limit 250) but these are all listed on the fee schedule.
What is the maximum amount of time allowed to issue a determination on a prior authorization request?	10 business days	10 business days
Strategy		

[8] The utilization management vendor for HCPF's fee-for-service benefit is responsible for reviewing the majority of codes in the following benefit categories: Durable Medical Equipment (DME), Physical Therapy, Occupational Therapy, Pediatric Behavioral Therapy, Speech Therapy, Synagis, select medical surgeries, gender affirming care services, bariatric surgeries, EPSDT Exceptions, Audiology, Vision, Diagnostic Imaging, Molecular Testing, Out of State Inpatient Admissions, Private Duty Nursing, Pediatric Long Term Home Health, Pediatric Personal Care Services. To view the PAR requirements for each code, see the Fee Schedule(s).

PRIOR AUTHORIZATION SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
Are prior authorization policies the same for both in-network and out-of-network providers?	Yes[9]	Yes[10]
Evidentiary Services		
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to determine whether to prior authorize outpatient services?	The FFS UM Vendor uses InterQual and MCG	The FFS UM Vendor uses InterQual and MCG
Does the plan use internally developed guidelines to determine whether to prior authorize services? IF YES: How frequently are those guidelines updated?	Yes, when no InterQual or MCG criteria is available. Reviewed regularly and updated as evidence/best practices change. PBT is the only OP MH/SUD service subject to internally developed criteria	Yes, when no InterQual or MCG criteria is available. Reviewed regularly and updated as evidence/best practices change. 1328 REV codes and CPT codes that utilize in whole or in part internally developed, state developed criteria.

Prior Authorization

Findings: Scenario 1 – Outpatient Services

The goals of Colorado Medicaid's Utilization Management Program are to improve members' quality of care and ensure members are receiving the right service at the right time for the right duration in the right setting.

The outpatient prior authorization policies and procedures regarding determination timeframes, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services are the same as the policies and procedures of M/S services and follow standard industry practice. Furthermore, only 1 outpatient MH/SUD service is subject to PAR so the policies for MH/SUD are much less stringent than those for outpatient M/S.

It is determined that these policies and procedures are parity compliant.

[9] The term in-network and out-of-network is not used by FFS UM since the ColoradoPAR program serves the entire state of Colorado and look at in-state and out-of-state (OOS) providers. Some border facilities are considered in-state. Both OOS and in-state providers need to be enrolled with Medicaid to bill for services and the authorization policies are the same.
[10] Ibid.

PRIOR AUTHORIZATION SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
Pharmacy Services		
Process		
Are services in this classification subject to prior authorization?	Medications that are listed as non-preferred agents on the preferred drug list require PAR. Drug products requiring a prior authorization for the Health First Colorado pharmacy benefit are listed in Appendix P - Pharmacy Benefit Prior Authorization Procedures and Criteria[11]. Exceptions exist within drug category and can be found in Appendix P. Some physician administered drugs (PADs) are subject to PAR as of 2021. Exceptions exist within drug category and can be found in Appendix P.	Medications that are listed as non-preferred agents on the preferred drug list require PAR. Drug products requiring a prior authorization for the Health First Colorado pharmacy benefit are listed in Appendix P - Pharmacy Benefit Prior Authorization Procedures and Criteria[12]. Exceptions exist within drug category and can be found in Appendix P. Some physician administered drugs (PADs) are subject to PAR as of 2021. Exceptions exist within drug category and can be found in Appendix P.
What is the maximum amount of time allowed to issue a determination on a prior authorization request?	24 hours	24 hours
Does the plan impose any prior authorization requirements or step therapy requirements as a prerequisite to authorizing coverage for any prescription medication approved by the Food and Drug Administration for the treatment of substance use disorders? If so, please explain.	No	No
Strategy		
Are prior authorization policies the same for both in-network and out-of-network providers?	Yes	Yes
Evidentiary Services		
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to determine	Internally developed guidelines are used.	Internally developed guidelines are used.

[11] The Department of Health Care Policy & Financing Pharmacy Resources webpage.
[12] Ibid.

PRIOR AUTHORIZATION SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
whether to prior authorize pharmacy services?		
Does the plan use internally developed guidelines to determine whether to prior authorize services? IF YES: How frequently are those guidelines updated?	Yes. Criteria are based on FDA product labeling, CMS approved compendia, clinical practice guidelines, and peer-reviewed medical literature. All reviews go to the Drug Utilization Review Board who review and act as an advisory council. Criteria are updated as new best practices are established.	Yes. Criteria are based on FDA product labeling, CMS approved compendia, clinical practice guidelines, and peer-reviewed medical literature. All reviews go to the Drug Utilization Review Board who review and act as an advisory council. Criteria are updated as new best practices are established.

Prior Authorization

Findings: Scenario 1 – Pharmacy Services

Colorado Medicaid requires prior authorization for all drugs not listed on the preferred drug list (PDL). The PDL is developed based on safety, effectiveness, and clinical outcomes from classes of medications where there are multiple drug alternatives available and supplemental rebates from drug companies, allowing Colorado the ability to provide medications at the lowest possible costs. The goals of Colorado Medicaid's Utilization Management Program are to improve members' quality of care and ensure members are receiving the right service at the right time for the right duration in the right setting.

The pharmacy services prior authorization policies and procedures regarding exception policies, determination timeframes, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services are the same as the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 2: Prior Authorization

PRIOR AUTHORIZATION SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
Inpatient Services		
Process		

PRIOR AUTHORIZATION SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
Are services in this classification subject to prior authorization?	All IP MH/SUD services except 3.2WM and 3.7WM require PAR	All IP M/S services require PAR.[13]
What is the maximum amount of time allowed to issue a determination on a prior authorization request?	- IP MH or IP SUD (3.7) if member has not been placed: 72 hours - IP MH or IP SUD (3.7) if the member has already been placed: 24 hours - Special Connections 3.7 services whether the member has been placed or not: 24 hours[14]	All IP services: 72 hours
Strategy		
Are prior authorization policies the same for both in-network and out-of-network providers?	No, all OON IP services require PAR except emergency services.	No, all OON IP services require PAR except emergency services.
Evidentiary Services		
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to determine whether to prior authorize inpatient services?	MCG for MH ASAM for SUD	MCG for M/S
Does the plan use internally developed guidelines to determine whether to prior authorize services? IF YES: How frequently are those guidelines updated?	Yes. RMHP uses internally developed guidelines for some services.[15]	Yes. RMHP uses internally developed guidelines for some services. Updated annually at minimum.

Prior Authorization

Findings: Scenario 2 – Inpatient Services

Rocky Mountain Health Plan uses PAR for both their RAE 1 and Prime MCO lines of business to monitor and prevent potential overutilization and underutilization; manage high-cost and prolonged-duration services; ensure enrollee safety; determine the appropriate level of care;

[13] RMHP Prime policy document "RMHP_Clinical_Preauth_List_20220101 V3" provides a full list of service codes that do require prior authorization. Any service code that is not on this list does not require prior authorization.
[14] If there is missing clinical information needed to make a medical necessity decision, an extension can be taken extending the turnaround time by 14 days. In most cases, an extension is not needed.
[15] This is a change for the 2024 Report. There is an internally developed guideline for Eating Disorder Treatment, created in collaboration with HCPF. The change was in response to Colorado Senate Bill 23-176.

and determine whether the service or item is medically necessary. This rationale is applied to both MH/SUD services and M/S services.

The inpatient prior authorization policies and procedures regarding exception policies, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services are substantially similar to the policies and procedures of M/S services and in a few situations they are less restrictive or more favorable for MH/SUD services than M/S services, and follow standard industry practice. MH/SUD services and M/S services both require authorization for inpatient services that follow current best practices. The authorization determination timeframes used for MH/SUD and M/S services are based upon timeframes set by state and federal, as well as nationally-recognized industry standards of practice. So while the timeframes for determination may be different, these policies and procedures applied to MH/SUD and M/S services have not been found to be more stringent nor create a barrier to access to care for members.

It is determined that these policies and procedures are parity compliant.

PRIOR AUTHORIZATION

SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO

QUESTION	MH/SUD	M/S
Outpatient Services		
Process		
Are services in this classification subject to prior authorization?	Most services do not require PAR. Some specialized, longer term, non-routine services do require PAR.[16]	Most services do not require PAR. Some specialized, longer term, non-routine services do require PAR.[17]
What is the maximum amount of time allowed to issue a determination on a prior authorization request?	10 days standard, 72 hours expedited	10 days standard, 72 hours expedited
Strategy		
Are prior authorization policies the same for both in-network and out-of-network providers?	No, all OON OP services require PAR except emergency services.	No, all OON OP services require PAR except emergency services.
Evidentiary Services		
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to determine	MCG for MH ASAM for SUD	MCG for M/S

[16] RAE 1 outpatient services that require prior authorization: 2.1, Mental Health Intensive Outpatient Programming (IOP), Partial Hospitalization Programming (PHP).

[17] A full list of Rocky Prime MCO outpatient services that require prior authorization can be found on the document "RMHP_Clinical_Preauth_List_20220101 V3". Any service code that is not on this list does not require prior authorization.

PRIOR AUTHORIZATION

SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO

QUESTION	MH/SUD	M/S
whether to prior authorize outpatient services?		
Does the plan use internally developed guidelines to determine whether to prior authorize services? IF YES: How frequently are those guidelines updated?	No	Yes, in some situations to supplement MCG criteria as needed. Updated annually at minimum.

Prior Authorization

Findings: Scenario 2 – Outpatient Services

Rocky Mountain Health Plan uses PAR for both their RAE 1 and Prime MCO lines of business to monitor and prevent potential overutilization and underutilization; manage high-cost and prolonged-duration services; ensure enrollee safety; determine the appropriate level of care; and determine whether the service or item is medically necessary. This rationale is applied to both MH/SUD services and M/S services.

The outpatient prior authorization policies and procedures regarding exception policies, determination timeframes, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice. MH/SUD services and M/S services both require authorization for a select set of outpatient services that follow current best practices. The outpatient prior authorization timeframes for determination are 10 days for standard and 72 hours for expedited. These timeframes are industry standard, are the same or faster than federal requirements (14 days standard/72 hours expedited) and are consistent with Colorado State Rule (10 days standard/72 hours expedited).

It is determined that these policies and procedures are parity compliant.

PRIOR AUTHORIZATION

SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO

QUESTION	MH/SUD	M/S
Pharmacy Services		
Process		
Are services in this classification subject to prior authorization?	Only a select set of pharmacy services are subject to PAR Any drug that has limits on coverage is eligible for an exception request.	Only a select set of pharmacy services are subject to PAR Any drug that has limits on coverage is eligible for an exception request.

PRIOR AUTHORIZATION

SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO

QUESTION	MH/SUD	M/S
What is the maximum amount of time allowed to issue a determination on a prior authorization request?	24 hours	24 hours
Does the plan impose any prior authorization requirements or step therapy requirements as a prerequisite to authorizing coverage for any prescription medication approved by the Food and Drug Administration for the treatment of substance use disorders? If so, please explain.	No	No
Strategy		
Are prior authorization policies the same for both in-network and out-of-network providers?	Yes	Yes
Evidentiary Services		
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to determine whether to prior authorize pharmacy services?	No	No
Does the plan use internally developed guidelines to determine whether to prior authorize services? IF YES: How frequently are those guidelines updated?	Yes. All drugs that require PAR are subject to internally developed guidelines. Updated on an ad hoc basis.	Yes. All drugs that require PAR are subject to internally developed guidelines. Updated on an ad hoc basis.

Prior Authorization

Findings: Scenario 2 – Pharmacy Services

Drugs that are determined to need extra safety monitoring, are FDA indicated as 2nd/3rd/4th line or are high-cost low utilization/high utilization and moderate cost may get prior authorization criteria added to the drug when placed on formulary to ensure safe/effective use of the drug. This policy is applied equally to both MH/SUD and M/S.

The pharmacy services prior authorization policies and procedures regarding exception policies, determination timeframes, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services are the same as the policies and procedures of M/S services, and follow standard industry practice. There are substantially more M/S drugs impacted by limitations than MH/SUD drugs.

It is determined that these policies and procedures are parity compliant.

Scenario 3: Prior Authorization

PRIOR AUTHORIZATION SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
Inpatient Services					
Process					
Are services in this classification subject to prior authorization?	All IP services except 3.2WM (H0010) and 3.7WM (H0011) require PAR	All IP services except 3.2WM (H0010) and 3.7WM (H0011) require PAR	All IP services except ASAM 3.2 and 3.7WM require PAR[18]	All IP services except ASAM 3.2WM and 3.7WM require PAR	No IP M/S services are subject to PAR for admission or medical necessity. IP PAR is focused on facilitating hospital notification of RAEs to facilitate complex discharges. The procedure codes selected are related to codes HCPF has specific coverage criteria for. The APR-DRG and RAC systems function as a

[18] Inpatient WM (3.7WM) does not require prior authorization (per contract), but requires concurrent review after day four (4). COA does not require prior authorization or concurrent review on 3.2WM services (considered an outpatient service). COA monitors utilization patterns for these services and can perform retrospective review as needed.

PRIOR AUTHORIZATION SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
					disincentive limiting inefficient services.[19]
What is the maximum amount of time allowed to issue a determination on a prior authorization request?	- IP MH or IP SUD (3.7) if member has not been placed: 72 hours - IP MH or IP SUD (3.7) if the member has already been placed: 24 hours - Special Connections 3.7 services whether the member has been placed or not: 24 hours[20]	72 hours	72 hours	72 hours	1 business day
Strategy					
Are prior authorization policies the same for both	No, all OON inpatient services	Yes	Yes	No, all OON inpatient services require prior	Yes

[19] HCPF's FFS does not utilize PARs for admissions or CCRs for continued stays due to the framework of an inpatient All-Patient Diagnosis Related Group (APR-DRG) based reimbursement system. Conducting PARs and CCRs interferes with the existing Recovery Audit Contractor (RAC) system that systematically audits claims. The RAC system retrospectively identifies potential payment errors in areas such as duplicate payments, fiscal intermediaries' mistakes, medical necessity, and coding and determines if documentation supports the inpatient versus observation status. The RAC system replaces the function of an admission or medical necessity PAR through the retrospective audit creating a potential of non-payment to a provider. Furthermore, the APR-DRG's payment based upon an average length of stay creates a disincentive for inefficiency of services. For MH/SUD services, an authorization process that occurs at both admission to an inpatient setting, and on a concurrent basis to determine the need for continued length of stay, is necessary to ensure efficiency of services due to claims being paid on a per diem basis.

[20] If there is missing clinical information needed to make a medical necessity decision, an extension can be taken extending the turnaround time by 14 days. In most cases, an extension is not needed.

PRIOR AUTHORIZATION SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
in-network and out-of-network providers?	require prior authorization with the exception of emergency services.			authorization with the exception of emergency services.	
Evidentiary Services					
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to determine whether to prior authorize inpatient services?	MCG for MH ASAM for SUD	InterQual for MH ASAM for SUD	InterQual for MH ASAM for SUD	MCG for MH ASAM for SUD	InterQual and MCG for M/S
Does the plan use internally developed guidelines to determine whether to prior authorize services? IF YES: How frequently are those guidelines updated?	Yes. RMHP uses internally developed guidelines for some services.[21] Updated annually, at a minimum.	No	No	No	Yes, when no InterQual or MCG criteria is available. Reviewed regularly and updated as evidence/best practices change.

Prior Authorization

Findings: Scenario 3 – Inpatient Services

[21] This is a change for the 2024 Report. There is an internally developed guideline for Eating Disorder Treatment, created in collaboration with HCPF. The change was in response to Colorado Senate Bill 23-176.

Prior authorization policies and procedures seek to ensure that members are receiving the safe and appropriate level of care that is necessary for their condition.

The inpatient prior authorization policies and procedures regarding exception policies, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services are substantially similar to the policies and procedures of M/S services and follow standard industry practice. The authorization determination timeframes used for MH/SUD and M/S services are based upon timeframes set by state and federal, as well as nationally recognized industry standards of practice. So while the timeframes for determination may be different, these policies and procedures applied to MH/SUD and M/S services have not been found to be more stringent nor create a barrier to access to care for members.

While the APR-DRG + RAC system utilized for M/S services and the per diem + authorization system utilized for MH/SUD services are not the same, they both accomplish the same goals of ensuring member access to medically necessary treatment, utilizing the least restrictive setting possible for care and avoiding unnecessary institutionalization, and maintaining cost control savings for Colorado. They are both nationally recognized industry standards of practice. The requirements, processes, and rationale are comparable and applied no more stringently.

Therefore, it is determined that while these policies and procedures are not the same, they are compliant with parity regulations.

PRIOR AUTHORIZATION SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
Outpatient Services					
Process					
Are services in this classification subject to prior authorization?	Most services do not require PAR. Some specialized, longer term, non-routine services do require PAR.[22]	Most services do not require PAR. Some specialized, longer term, non-routine services do require PAR.[23]	Most services do not require PAR. Some specialized, longer term, non-routine services do require PAR.[24]	Most services do not require PAR. Some specialized, longer term, non-routine services do require PAR.[25]	Thousands of codes require PAR, including conditional PAR requirements.[26] Some conditional PAR requirements exist in certain circumstances where a PAR would not be needed (ie: diapers under unit limit 250) - all are listed on the fee schedule. Services provided emergently

[22] RAE 1 outpatient services that require prior authorization: MH services include 2.1, Mental Health Intensive Outpatient Programing (IOP), Mental Health Partial Hospitalization Programming (PHP). They are subject to PAR because some of them are longer term services and lend to being concurrently reviewed to ensure members are still meeting medical necessity.

[23] RAE 2 & 4 routine services that do not require prior authorization: 0510, 0513, 90791, 90792, 90832, 90834, 90837, 90839, 90846, 90847, 90849, 90853, 96372, H0001, H0002, H0004, H0005, H0006, H0018, H0020, H0023, H0025, H0031-34, H0036-38, H2000, H2014-18, H2021, H2022, H2027, H2030, H2031, S9445, S9453, S9454, T1017, T1023, psychological testing, and all E&M codes.

[24] RAE 3 & 5 outpatient services that require prior authorization: Acute Treatment unit, Mental health residential treatment, SUD residential treatment, Intensive Outpatient, Partial hospitalization, Psychological testing, Electroconvulsive therapy, Day treatment.

[25] RAE 6 & 7 outpatient services that do not require prior authorization: 90785, 90832, 90833, 90834, 90836, 90837, 90838, 90846, 90847, 90849, 90853, 90875, 90876, 96116, 96121, 96130-96138, 96372, 97535, h0001-h0006, h0010 (No PAR for first five days of treatment), h0020, h0033, h0034, h0035, h0045, h2014, h2023-h2037, s9445, s9485, t1005, t1017, 90791, 90792, 90839, 98966-98968,h0001-h0005, h0023, h0025, h0031, t1016, h0032, h0033, h0034, h2000, h2011, s9453, s9454, 99241-99245, 99201-99443, 90833-90838.

[26] The utilization management vendor for HCPF's fee-for-service benefit is responsible for reviewing the majority of codes in the following benefit categories: Durable Medical Equipment (DME), Physical Therapy, Occupational Therapy, Pediatric Behavioral Therapy, Speech Therapy, Synagis, select medical surgeries, gender affirming care services, bariatric surgeries, EPSDT Exceptions, Audiology, Vision, Diagnostic Imaging, Molecular Testing, Out of State Inpatient Admissions, Private Duty Nursing, Pediatric Long Term Home Health, Pediatric Personal Care Services.
To view the PAR requirements for each code, see the Fee Schedule(s).

PRIOR AUTHORIZATION SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
					would override a PAR requirement.
What is the maximum amount of time allowed to issue a determination on a prior authorization request?	10 days for standard, 72 hours for expedited	10 days for standard, 72 hours for expedited	10 days for standard, 72 hours for expedited	10 days for standard, 72 hours for expedited	10 days
Strategy					
Are prior authorization policies the same for both in-network and out-of-network providers?	All OON OP services require PAR	All OON OP services require PAR	All OON OP services require PAR	All OON OP services require PAR	Yes.[27]
Evidentiary Services					
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to determine whether to prior authorize outpatient services?	MCG for MH ASAM for SUD	InterQual for MH ASAM for SUD	InterQual for MH ASAM for SUD	MCG for MH ASAM for SUD	InterQual and MCG for M/S
Does the plan use internally developed guidelines to determine whether to prior authorize services?	No	No	No	No	Yes. If no InterQual or MCG criteria is available, state-specific criteria, based on industry best

[27] The term in-network and out-of-network is not used by FFS UM since the ColoradoPAR program serves the entire state of Colorado and look at in-state and out-of-state (OOS) providers. Some border facilities are considered in-state. Both OOS and in-state providers need to be enrolled with Medicaid to bill for services and the authorization policies are the same.

PRIOR AUTHORIZATION SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
IF YES: How frequently are those guidelines updated?					practice and evidenced based research, is utilized. For any members aged 20 and under, EPSDT guidelines and definition are utilized when determining a review outcome. 1328 REV codes and CPT codes utilize in whole or in part internal state developed criteria.

Prior Authorization

Findings: Scenario 3 – Outpatient Services

The outpatient prior authorization policies and procedures regarding exception policies, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services are substantially similar to the policies and procedures of M/S services and follow standard industry practice. MH/SUD services and M/S services both require authorization for a select set of outpatient services that follow current best practices. The authorization determination timeframes used for MH/SUD and M/S services are based upon timeframes set by state and federal, as well as nationally-recognized industry standards of practice. So, while the timeframes for determination may be different, these policies and procedures applied to MH/SUD and M/S services have not been found to be more stringent nor create a barrier to access to care for members.

It is determined that these policies and procedures are parity compliant.

Scenario 4: Prior Authorization

PRIOR AUTHORIZATION SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
Inpatient Services		
Process		
Are services in this classification subject to prior authorization?	No PAR is required for in-network[28] IP services. All out-of-network care requires PAR except ASAM 3.2WM and 3.7WM	No PAR is required for in-network[29] IP care unless it is for Acute rehabilitation, bariatric surgery; blepharoplasty, breast procedures, chemical peels dermabrasion, electrolysis, intersex surgical remediation, penile implants and varicose veins. All out-of-network care requires PAR
What is the maximum amount of time allowed to issue a determination on a prior authorization request?	72 hours	72 hours for urgent admission. Elective surgery admissions/procedures is 10 days.
Strategy		
Are prior authorization policies the same for both in-network and out-of-network providers?	Yes. However, IP services for DHMP members admitting to Denver Health Hospital do not require PAR.	No. Care at any out-of-network provider/facility requires PAR. Surgical procedures provided at Denver Health Facility do not require PAR. Services provided at facilities outside of Denver Health Hospital require PAR. In or out-of-network providers must request PAR for Acute rehabilitation, bariatric surgery; blepharoplasty, breast procedures, chemical peels dermabrasion, electrolysis, intersex surgical remediation, penile

[28] "In-network" refers to services provided at Denver Health facilities.
[29] Ibid

PRIOR AUTHORIZATION SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
		implants and varicose veins.
Evidentiary Services		
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to determine whether to prior authorize inpatient services?	InterQual for MH ASAM for SUD	MCG for M/S
Does the plan use internally developed guidelines to determine whether to prior authorize services? IF YES: How frequently are those guidelines updated?	No	No

Prior Authorization

Findings: Scenario 4 – Inpatient Services

Prior authorization is used to ensure the member is being treated in the least restrictive environment appropriate for their condition.

The inpatient prior authorization policies and procedures regarding exception policies, determination timeframes, and evidentiary standards for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice. Additionally, M/S requires PAR for a select set of in-network IP services. The authorization determination timeframes used for MH/SUD and M/S services are based upon timeframes set by state and federal, as well as nationally-recognized industry standards of practice. So while the timeframes for determination may be different, these policies and procedures applied to MH/SUD and M/S services have not been found to be more stringent nor create a barrier to access to care for members.

Authorization requirement policies for MH/SUD and M/S, as they apply to in-network and out-of-network services are the same.

It is determined that these policies and procedures are parity compliant.

PRIOR AUTHORIZATION SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
Outpatient Services		
Process		

PRIOR AUTHORIZATION SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
Are services in this classification subject to prior authorization?	Only the following OP services require PAR: Acute Treatment unit, Mental health residential treatment, SUD residential treatment, Intensive Outpatient, Partial hospitalization, Psychological testing, Electroconvulsive therapy, Day treatment	In-network services subject to PAR: DME rental and purchase if greater than $500, Home health care greater than day 31-60, Autism evaluation, Early intervention services, Enteral and oral nutrition supplements, Genetic testing Outpatient therapy - days 31+ until discharge Transplant evaluations and follow up care. All out-of-network services require PAR.
What is the maximum amount of time allowed to issue a determination on a prior authorization request?	10 days for standard, 72 hours for expedited	10 days for standard, 72 hours for urgent requests.
Strategy		
Are prior authorization policies the same for both in-network and out-of-network providers?	No, all OP out-of-network services require PAR. Out-of-network refers to non-contracted providers.	No authorization is required for care at a Denver Health Facility. Care outside of Denver Health Facility requires authorization.
Evidentiary Services		
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to determine whether to prior authorize outpatient services?	InterQual for MH ASAM for SUD	MCG, Hayes Knowledge Center, and Uptodate
Does the plan use internally developed guidelines to determine whether to prior authorize services? IF YES: How frequently are those guidelines updated?	No	Yes. Oral/enteral nutrition; sleep apnea eval and treatment; hair prosthesis; Dental & anesthesia facility charges. All other types of

PRIOR AUTHORIZATION SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
		care DHMC uses MCG. Reviewed annually.

Prior Authorization

Findings: Scenario 4 – Outpatient Services

Routine MH/SUD outpatient services do not require prior authorization. Some specialty and/or higher acuity outpatient services do require prior authorization, consistent with industry standards, to ensure that the member cannot be treated in a less restrictive environment.

The outpatient prior authorization policies and procedures regarding exception policies, determination timeframes, and evidentiary standards for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice.

Policies for MH/SUD and M/S, as they apply to in-network and out-of-network services, are substantially similar.

It is determined that these policies and procedures are parity compliant.

PRIOR AUTHORIZATION SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
Pharmacy Services		
Process		
Are services in this classification subject to prior authorization?	Few MH drugs are subject to prior authorization[30]. No PAR required for SUD/OUD medications. Exceptions are reviewed on a case by case basis. Medical exceptions are allowed to the PA when the requestor (provider) gives clinical rationale for why the medication is medically necessary	DHMC reviews for injectable or IV medications that are non-formulary. OP M/S drugs: Not all are subject to PAR. See formulary.

[30] DHMC only requires prior authorization for the following mental health drugs: Abilify Maintena, Daytrana, Fanapt, Invega Sustenna, Kapvay, Saphris, Zyprexa Relprevv. No substance use disorder drugs are subject to prior authorization.

PRIOR AUTHORIZATION SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
What is the maximum amount of time allowed to issue a determination on a prior authorization request?	IP: 72 hours for urgent requests; 10 days for standard requests OP: 24 hours	IP: 72 hours for urgent requests; 10 days for standard requests OP: 24 hours
Does the plan impose any prior authorization requirements or step therapy requirements as a prerequisite to authorizing coverage for any prescription medication approved by the Food and Drug Administration for the treatment of substance use disorders? If so, please explain.	No	No
Strategy		
Are prior authorization policies the same for both in-network and out-of-network providers?	Yes	In-network requires review if medication is listed Specialty Infusion Grid. All out of network always requires authorization. For OP pharmacy, policies are the same.
Evidentiary Services		
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to determine whether to prior authorize pharmacy services?	Peer-reviewed medical literature, Accepted national treatment guidelines, Drug compendia in common use, Other authoritative medical sources, Expert opinion has been obtained where necessary.	Peer-reviewed medical literature, Accepted national treatment guidelines, Drug compendia in common use, Other authoritative medical sources, Expert opinion has been obtained where necessary.
Does the plan use internally developed guidelines to determine whether to prior authorize services? IF YES: How frequently are those guidelines updated?	No	No

Prior Authorization

Findings: Scenario 4 – Pharmacy Services

Prior authorization review policies for Prescription Drug services are used for member safety and cost containment.

The pharmacy services prior authorization policies and procedures regarding exception policies, determination timeframes, in-network vs out-of-network policies, and evidentiary

standards for MH/SUD services are the same as the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Appendix B – Concurrent Review

Description: Concurrent review (CCR) requires services be periodically reviewed as they are being provided in order to continue the authorization for the service. *Note that no emergency services require prior authorization*.

Tools for Analysis: Data request, interviews with health plan staff, and policies/procedures documents referencing CCR utilization management policies, frequency of review, and reviewer qualifications.

Summary of Results: The following table illustrates the characteristics of each scenario including health plans being compared, applicable benefit categories, whether differences were found in the analysis, and compliance finding.

	Used by	Benefit Categories	Differences between M/S and MH/SUD	Compliance Determined
Scenario 1	HCPF	IP, OP	No	✓Yes
Scenario 2	RMHP and Prime MCO	IP, OP	Yes. Frequency of review is different.	✓Yes
Scenario 3	RAE 1	IP, OP	Yes. See tables below.	✓Yes
	RAE 2 and 4	IP, OP	Yes. See tables below.	✓Yes
	RAE 3 and 5	IP, OP	Yes. See tables below.	✓Yes
	RAE 6 and 7	IP, OP	Yes. See tables below.	✓Yes
Scenario 4	Denver PIHP and Denver Health MCO	IP, OP	Yes. See tables below.	✓ Yes

Results by Scenario: On the following pages, each scenario is expanded into an overview of primary policies that impact this NQTL.

Scenario 1: Concurrent Review

CONCURRENT REVIEW SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
Inpatient Services		
Process		
Are services in this classification subject to concurrent review?	No IP MH/SUD services are subject to CCR for continued stays. IP CCR is focused on facilitating hospital notification of RAEs to facilitate complex discharges. The procedure codes selected are related to codes HCPF has specific coverage criteria for. The APR-DRG and RAC system functions as a disincentive limiting inefficient services.[31]	No IP M/S services are subject to CCR for continued stays. IP CCR is focused on facilitating hospital notification of RAEs to facilitate complex discharges. The procedure codes selected are related to codes HCPF has specific coverage criteria for. The APR-DRG and RAC system functions as a disincentive limiting inefficient services.[32]
How frequently is concurrent review required for services in this classification?	N/A	N/A
What is the maximum amount of time allowed to issue a determination on a concurrent review request?	N/A	N/A
Strategy		
Are concurrent review policies the same for both in-network and out-of-network providers?	Yes[33]	Yes[34]
Evidentiary Services		
Does the plan use nationally recognized evidence-based clinical decision support products (InterQual, Milliman, etc.) to make decisions regarding concurrent review for inpatient services?	The FFS UM Vendor uses InterQual and MCG	The FFS UM Vendor uses InterQual and MCG

[31] HCPF's FFS does not utilize CCRs for continued stays due to the framework of an inpatient All-Patient Diagnosis Related Group (APR-DRG) based reimbursement system. Conducting CCRs interferes with the existing Recovery Audit Contractor (RAC) system that systematically audits claims. The RAC system retrospectively identifies potential payment errors in areas such as duplicate payments, fiscal intermediaries' mistakes, medical necessity, and coding and determines if documentation supports the inpatient versus observation status. The RAC system replaces the function of medical necessity through the retrospective audit creating a potential of non-payment to a provider. Furthermore, the APR-DRG's payment based upon an average length of stay creates a disincentive for inefficiency of services.

[32] Ibid

[33] The term in-network and out-of-network is not used by FFS UM since the ColoradoPAR program serves the entire state of Colorado and look at in-state and out-of-state (OOS) providers. Some border facilities are considered in-state. Both OOS and in-state providers need to be enrolled with Medicaid to bill for services and the authorization policies are the same.

[34] Ibid

CONCURRENT REVIEW SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
"Does the plan use internally developed guidelines to determine whether to concurrently review services? Does the plan use internally developed guidelines to determine whether to concurrently review services? IF YES: How frequently are those guidelines updated?	Yes, when no InterQual or MCG criteria is available. Reviewed regularly and updated as evidence/best practices change.	Yes, when no InterQual or MCG criteria is available. Reviewed regularly and updated as evidence/best practices change.

Concurrent Review

Findings: Scenario 1 – Inpatient Services

Concurrent review is not used for inpatient fee-for-service MH/SUD or M/S services. Instead of CCR for continued stays, claims are paid based upon an average length of stay. A cost outlier payment may be added to reimbursement for exceptionally expensive cases, however the RAC system's retroactive audit functions to ensure appropriate services are utilized through the potential of non-payment. The policies and procedures applied to MH/SUD are the same as the policies and procedures of M/S services and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

CONCURRENT REVIEW SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
Outpatient Services		
Process		
Are services in this classification subject to concurrent review?	Services that are subject to PAR are subject to CCR. For MH/SUD, the only service subject to PAR is PBT.[35]	Services that are subject to PAR are subject to CCR.[36]
How frequently is concurrent review required for services in this classification?	Frequency of CCR is established based on the type of service, intensity of the service, and member acuity, and verified against	Frequency of CCR is established based on the type of service, intensity of the service, and member acuity, and verified against clinical

[35] HCPF does not refer to the authorization as a "concurrent review" authorization, but as a new "prior authorization". The process followed by provider submitting the request, and the UM Vendor internally, for an ongoing OP service resembles a PAR process. For example, if a member is authorized for 6 months of physical therapy, and they need 6 months more, then the process is considered internally as a new PAR but is a continued service as far as the member is concerned.
[36] Ibid.

CONCURRENT REVIEW SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
	clinical decision support product recommendations.	decision support product recommendations.
What is the maximum amount of time allowed to issue a determination on a concurrent review request?	The UM Vendor has 10 days business days to complete the review, upon receipt of all necessary documentation from the provider or facility.	The UM Vendor has 10 days business days to complete the review, upon receipt of all necessary documentation from the provider or facility.
Strategy		
Are concurrent review policies the same for both in-network and out-of-network providers?	Yes	Yes
Evidentiary Services		
Does the plan use nationally recognized evidence-based clinical decision support products (InterQual, Milliman, etc.) to make decisions regarding concurrent review for outpatient services?	The FFS UM Vendor uses InterQual and MCG	The FFS UM Vendor uses InterQual and MCG
Does the plan use internally developed guidelines to determine whether to concurrently review services? IF YES: How frequently are those guidelines updated?	Yes, when no InterQual or MCG criteria is available. Reviewed regularly and updated as evidence/best practices change. PBT is the only OP MH/SUD service subject to internally developed criteria	Yes, when no InterQual or MCG criteria is available. Reviewed regularly and updated as evidence/best practices change. 1328 REV codes and CPT codes that utilize in whole or in part internally developed, state developed criteria.

Concurrent Review

Findings: Scenario 1 – Outpatient Services

The goals of Colorado Medicaid's Utilization Management Program are to improve members' quality of care and ensure members are receiving the right service at the right time for the right duration in the right setting.

The outpatient concurrent review policies and procedures regarding frequency of review, determination timeframes, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services are the same as the policies and procedures of M/S services and follow standard industry practice. Furthermore, only 1 outpatient MH/SUD service is subject to CCR so the policies for MH/SUD are much less stringent than those for outpatient M/S.

It is determined that these policies and procedures are parity compliant.

Scenario 2: Concurrent Review

CONCURRENT REVIEW SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
Inpatient Services		
Process		
Are services in this classification subject to concurrent review?	All services that require PAR are subject to CCR. 3.7WM is CCR if member is in facility for > 5 days.	All services that require PAR are subject to CCR.
How frequently is concurrent review required for services in this classification?	Frequency of CCR is established based on the type of service, intensity of the service, and member acuity, and verified against clinical decision support product recommendations. 3-7 days generally	Frequency of CCR is established based on the type of service, intensity of the service, and member acuity, and verified against clinical decision support product recommendations. Daily or less frequently, depending on clinical presentation and discharge planning need.
What is the maximum amount of time allowed to issue a determination on a concurrent review request?	24 hours	24 hours
Strategy		
Are concurrent review policies the same for both in-network and out-of-network providers?	No, OON providers need CCR for ANY ongoing service. In-network providers only CCR for services on PAR list.	No, OON providers need CCR for ANY ongoing service. In-network providers only CCR for services on PAR list.
Evidentiary Services		
Does the plan use nationally recognized evidence-based clinical decision support products (InterQual, Milliman, etc.) to make decisions regarding concurrent review for inpatient services?	MCG for MH and ASAM for SUD	MCG
Does the plan use internally developed guidelines to determine whether to concurrently review services? IF YES: How frequently are those guidelines updated?	Yes, for some IP MH/SUD services. Updated annually at a minimum.[37]	Yes, for some IP M/S services. Updated annually at a minimum.

[37] This is a change for the 2024 Report. There is an internally developed guideline for Eating Disorder Treatment, created in collaboration with HCPF. The change was in response to Colorado Senate Bill 23-176.

Concurrent Review

Findings: Scenario 2 – Inpatient Services

The health plan uses concurrent review to monitor and prevent potential overutilization and underutilization, manage high-cost and prolonged-duration services, ensure enrollee safety, determine the appropriate level of care, and determine whether the service or item continues to be medically necessary.

The inpatient concurrent review policies and procedures regarding exception policies, frequency of review, determination timeframes, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services are substantially similar to the policies and procedures of M/S services and in a few situations they are less restrictive or more favorable for MH/SUD services than M/S services, and follow standard industry practice. The estimated timeframes for frequency of concurrent review are different, but they are both established based on the type of service, intensity of the service, and member acuity, and verified against clinical decision support product recommendations.

It is determined that these policies and procedures are parity compliant.

CONCURRENT REVIEW

SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO

QUESTION	MH/SUD	M/S
Outpatient Services		
Process		
Are services in this classification subject to concurrent review?	All services that require PAR are subject to CCR.[38] 2.1, MH IOP, MH PHP	All services that require PAR are subject to CCR.[39] See PAR list for codes requiring PAR.
How frequently is concurrent review required for services in this classification?	Frequency of CCR is established based on the type of service, intensity of the service, and member acuity, and verified against clinical decision support product recommendations. ~5-10 days	Frequency of CCR is established based on the type of service, intensity of the service, and member acuity, and verified against clinical decision support product recommendations. ~Every 1-2 months

[38] RMHP updated their policies to consider all OP CCR as new authorizations (PARs).
[39] Ibid

CONCURRENT REVIEW SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
What is the maximum amount of time allowed to issue a determination on a concurrent review request?	24 hours	24 hours
Strategy		
Are concurrent review policies the same for both in-network and out-of-network providers?	No, OON providers need CCR for ANY ongoing service. In-network providers only CCR for services on PAR list.	No, OON providers need CCR for ANY ongoing service. In-network providers only CCR for services on PAR list.
Evidentiary Services		
Does the plan use nationally recognized evidence-based clinical decision support products (InterQual, Milliman, etc.) to make decisions regarding concurrent review for outpatient services?	MCG for MH ASAM for SUD	MCG
Does the plan use internally developed guidelines to determine whether to concurrently review services? IF YES: How frequently are those guidelines updated?	No	No

Concurrent Review

Findings: Scenario 2 – Outpatient Services

The health plan uses concurrent review to monitor and prevent potential overutilization and underutilization, manage high-cost and prolonged-duration services, ensure enrollee safety, determine the appropriate level of care, and determine whether the service or item continues to be medically necessary.

The outpatient concurrent review policies and procedures regarding exception policies, frequency of review, determination timeframes, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services are substantially similar to the policies and procedures of M/S services and follow standard industry practice. The estimated timeframes for frequency of concurrent review are different, but they are both established based on the type of service, intensity of the service, and member acuity, and verified against clinical decision support product recommendations.

It is determined that these policies and procedures are parity compliant.

Scenario 3: Concurrent Review

CONCURRENT REVIEW SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
Inpatient Services					
Process					
Are services in this classification subject to concurrent review?	All IP services that require PAR are subject to CCR. 2.1, MH IOP, MH PHP	All IP services that require PAR are subject to CCR[40]	All IP services that require PAR are subject to CCR (this also includes 3.7 WM).	All IP services that require PAR are subject to CCR (this also includes 3.2 and 3.7 WM[41])[42]	No IP M/S services are subject to CCR for continued stays. IP CCR is focused on facilitating hospital notification of RAEs to facilitate complex discharges. The procedure codes selected are related to codes HCPF has specific coverage criteria for. The APR-DRG and RAC system functions as a

[40] In extremely rare situations (only 2 inpatient facilities currently), RAE 2 & 4 contract with case rate agreements where concurrent reviews are conducted less frequently. These case rate agreements have not been found to improve quality of care and are being phased out. Under this arrangement, authorizations are typically longer and require concurrent review approximately every 14 days rather than the general 3-5 day timeframe.
[41] For 3.2 and 3.7 WM CCR is required if admissions are longer than 5 days for 3.2 WM and 4 days for 3.7 WM per the 1115 waiver
[42] CCHA considers all CCR as new authorizations (PAR), outside of the high intensity services.

CONCURRENT REVIEW SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
					disincentive limiting inefficient services.[43]
How frequently is concurrent review required for services in this classification?	~3-7 days	~3-5 days	~3-7 days	~2-3 days[44]	N/A
What is the maximum amount of time allowed to issue a determination on a concurrent review request?	24 hours	72 hours	72 hours	72 hours	N/A
Strategy					
Are concurrent review policies the same for both in-network and out-of-network providers?	No, all out-of-network ongoing services are subject to CCR and in-network services only CCR ongoing	Yes	Yes	Yes	Yes[45]

[43] HCPF's FFS does not utilize CCRs for continued stays due to the framework of an inpatient All-Patient Diagnosis Related Group (APR-DRG) based reimbursement system. Conducting CCRs interferes with the existing Recovery Audit Contractor (RAC) system that systematically audits claims. The RAC system retrospectively identifies potential payment errors in areas such as duplicate payments, fiscal intermediaries' mistakes, medical necessity, and coding and determines if documentation supports the inpatient versus observation status. The RAC system replaces the function of medical necessity through the retrospective audit creating a potential of non-payment to a provider. Furthermore, the APR-DRG's payment based upon an average length of stay creates a disincentive for inefficiency of services.

[44] Frequency varies by the member's clinical presentation, but typically reviews are required every 2-3 days. CCHA medical necessity guidelines recommend courses of treatment based on diagnoses alongside outlier course of treatment that is monitored to ensure quality member treatment. Withdrawal management (3.2 WM and 3.7 WM) occurs at day 5 via statute. CCHA doesn't have any facilities on a DRG model, therefore they utilize MCG criteria. CCR time periods are based off the MCG recommendations for the course of care to ensure the member is receiving the right level of care and they are seeing improvement.

[45] The term in-network and out-of-network is not used by FFS UM since the ColoradoPAR program serves the entire state of Colorado and look at in-state and out-of-state (OOS) providers. Some border facilities are considered in-state. Both OOS and in-state providers need to be enrolled with Medicaid to bill for services and the authorization policies are the same.

CONCURRENT REVIEW SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
	services from PAR list.				
Evidentiary Services					
Does the plan use nationally recognized evidence-based clinical decision support products (InterQual, Milliman, etc.) to make decisions regarding concurrent review for inpatient services?	MCG for MH ASAM for SUD	InterQual for MH ASAM for SUD	InterQual for MH ASAM for SUD	MCG for MH ASAM for SUD	The FFS UM Vendor uses InterQual and MCG
Does the plan use internally developed guidelines to determine whether to concurrently review services? IF YES: How frequently are those guidelines updated?	Yes. RMHP uses internally developed guidelines for some services.[46]	No	No	No	Yes, when no InterQual or MCG criteria is available. Reviewed regularly and updated as evidence/best practices change.

[46] This is a change for the 2024 Report. There is an internally developed guideline for Eating Disorder Treatment, created in collaboration with HCPF. The change was in response to Colorado Senate Bill 23-176.

Concurrent Review

Findings: Scenario 3 – Inpatient Services

The inpatient concurrent review policies and procedures regarding frequency of review, determination timeframes, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services all follow standard industry practice. There are some differences seen between the RAEs on typical frequency of concurrent reviews. However, all plans base timeframes upon a member's clinical presentation and the requested service, and follow timeframes set by their clinical decision support systems which are industry standard.

While the APR-DRG + RAC system utilized for M/S services and the per diem + authorization system utilized for MH/SUD services are not the same, they both accomplish the same goals of ensuring member access to medically necessary treatment, utilizing the least restrictive setting possible for care and avoiding unnecessary institutionalization, and maintaining cost control savings for Colorado. Instead of concurrent review for continued stays that is used for MH/SUD services, M/S claims are paid based upon an average length of stay. A cost outlier payment may be added to reimbursement for exceptionally expensive cases, however the RAC system's retroactive audit functions to ensure appropriate services are utilized through the potential of non-payment.

Both systems are nationally recognized industry standards of practice. The requirements, processes, and rationale are comparable and applied no more stringently.

Therefore, it is determined that while these policies and procedures are not the same, they are compliant with parity regulations.

CONCURRENT REVIEW SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
Outpatient Services					
Process					
Are services in this classification subject to concurrent review?	Only OP services subject to PAR are subject to CCR.[47]	Only OP services subject to PAR are subject to CCR.[48]	Only OP services subject to PAR are subject to CCR.[49]	Only OP services subject to PAR are subject to CCR.[50]	Only OP services subject to PAR are subject to CCR.[51]
How frequently is concurrent review required for services in this classification?	~5-10 days	~3-5 days, or when needed for a single case agreement	Depends on the service. 3-5 days for acute / short-term services, 7-30 days for long-term / intensive services[52]	~1 week-6 months	The frequency of CCR depends on member presentation and progress made, and depending on the service.

[47] RAE 1 outpatient services that require prior authorization: MH services include 2.1, Intensive Outpatient Programing (IOP), Partial Hospitalization Programming (PHP). IOP and PHP are PA because they are longer term services. They naturally need to be concurrently reviewed to ensure members are still meeting medical necessity.
[48] RAE 2 & 4 routine services that do not require prior authorization: 0510, 0513, 90791, 90792, 90832, 90834, 90837, 90839, 90846, 90847, 90849, 90853, 96372, H0001, H0002, H0004, H0005, H0006, H0018, H0020, H0023, H0025, H0031-34, H0036-38, H2000, H2014-18, H2021, H2022, H2027, H2030, H2031, S9445, S9453, S9454, T1017, T1023, psychological testing, and all E&M codes. The outpatient services that do require authorization are generally considered non-routine or more complex interventions such as IOP, in-home services, respite, or ECT.
[49] RAE 3 & 5 outpatient services that require prior authorization: Acute Treatment unit, Mental health residential treatment, SUD residential treatment, Intensive Outpatient, Partial hospitalization, Psychological testing, Electroconvulsive therapy, Day treatment.
[50] RAE 6 & 7 outpatient services that do not require prior authorization: 90785, 90832, 90833, 90834, 90836, 90837, 90838, 90846, 90847, 90849, 90853, 90875, 90876, 96116, 96121, 96130-96138, 96372, 97535, h0001-h0006, h0010 (No PAR for first five days of treatment), h0020, h0033, h0034, h0035, h0045, h2014, h2023-h2037, s9445, s9485, t1005, t1017, 90791, 90792, 90839, 98966-98968,h0001-h0005, h0023, h0025, h0031, t1016, h0032, h0033, h0034, h2000, h2011, s9453, s9454, 99241-99245, 99201-99443, 90833-90838.
[51] HCPF does not refer to the authorization as a "concurrent review" authorization, but as a new "prior authorization". The process followed by provider submitting the request, and the UM Vendor internally, for an ongoing OP service resembles a PAR process. For example, if a member is authorized for 6 months of physical therapy, and they need 6 months more, then the process is considered internally as a new PAR but is a continued service as far as the member is concerned.
[52] RAE 3 & 5 standard concurrent review periods vary depending on the services being rendered: Acute Treatment unit: review every 3-5 days, Short-term Mental health residential treatment: 3-5 days, Long-term Mental health residential treatment: 14-30 days, SUD residential treatment: 7-30 days, Intensive Outpatient: 14-30 days, Partial hospitalization: 7 days, Electroconvulsive therapy: 14-60 days, Day treatment: 30 days

CONCURRENT REVIEW SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
What is the maximum amount of time allowed to issue a determination on a concurrent review request?	24 hours internal goal (10 days standard / 72 hours urgent required)	10 days for standard / 72 hours urgent	10 days for standard / 72 hours urgent	10 days for standard / 72 hours urgent	10 business days
Strategy					
Are concurrent review policies the same for both in-network and out-of-network providers?	No, any OON ongoing service is subject to CCR. In-network services only CCR services on PAR list.	Yes, once OON providers have secured a single case agreement for services.	Yes	No, any OON ongoing service is subject to CCR. In-network services only CCR services on PAR list.	Yes[53]
Evidentiary Services					
Does the plan use nationally recognized evidence-based clinical decision support products (InterQual, Milliman, etc.) to make decisions regarding concurrent review for outpatient services?	MCG for MH and ASAM for SUD	InterQual for MH and ASAM for SUD	InterQual for MH and ASAM for SUD	MCG for MH and ASAM for SUD	InterQual and MCG for M/S
Does the plan use internally developed guidelines to determine	No	No	No	No	Yes. If there is no InterQual or MCG criteria available,

[53] The term in-network and out-of-network is not used by FFS UM since the ColoradoPAR program serves the entire state of Colorado and look at in-state and out-of-state (OOS) providers. Some border facilities are considered in-state. Both OOS and in-state providers need to be enrolled with Medicaid to bill for services and the authorization policies are the same.

CONCURRENT REVIEW SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
whether to concurrently review services? IF YES: How frequently are those guidelines updated?					state-specific criteria, based in industry best practice and evidenced based research, is utilized. In addition, for any members aged 20 and under, the Vendor must utilize EPSDT guidelines and definition when determining a review outcome. 1328 REV codes and CPT codes that utilize in whole or in part internally developed, state developed criteria.

Concurrent Review

Findings: Scenario 3 – Outpatient Services

The outpatient concurrent review policies and procedures regarding frequency of review, required determination timeframes, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services all follow standard industry practice.

Most MH/SUD services are not subject to CCR. Some specialized, longer term, non-routine services do require PAR such as intensive outpatient programming and partial hospitalization programming. They are concurrently reviewed to ensure the most effective level of treatment and medically necessary services are being provided. Thousands of M/S codes require PAR. The UM vendor for HCPF's FFS benefit is responsible for reviewing the majority of codes in the following benefit categories: Durable Medical Equipment (DME), Physical Therapy, Occupational Therapy, Pediatric Behavioral Therapy, Speech Therapy, Synagis, select medical surgeries, gender affirming care services, bariatric surgeries, EPSDT Exceptions, Audiology, Vision, Diagnostic Imaging, Molecular

Testing, Out of State Inpatient Admissions, Private Duty Nursing, Pediatric Long Term Home Health, Pediatric Personal Care Services. CCR is also required for M/S services subject to conditional PAR requirements (ie: diapers under unit limit 250).

There are some differences seen between the RAEs on typical frequency of concurrent reviews. However, all plans base timeframes upon a member's clinical presentation and the requested service, and follow timeframes set by their clinical decision support systems which are industry standard.

Additionally, RMHP RAE 1 has set an internal requirement for determination timeframes at 24 hours, while it is required in Colorado State Rule that RAEs complete determinations within 10 days for standard requests and 72 hours for urgent requests.

It is determined that these policies and procedures are parity compliant.

Scenario 4: Concurrent Review

CONCURRENT REVIEW SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
Inpatient Services		
Process		
Are services in this classification subject to concurrent review?	In-Network, no review is performed and authorization is not required for initial or continued stay. Out-of-Network, a CCR occurs if member requires care longer than the initial review period.	In-Network, no review is performed and authorization is not required for initial or continued stay. Out-of-Network, a concurrent review occurs if member requires care longer than the initial review period.
How frequently is concurrent review required for services in this classification?	3-7 days generally, dependent on member's presentation, progress made, and care needed	CCR occurs prior to lapse of previously approved timeframe if continued length of stay is required. Timeframe is dependent on member's presentation, progress made, and care needed
What is the maximum amount of time allowed to issue a determination on a concurrent review request?	10 days for standard, 72 hours for urgent	10 days for standard. 72 hours for urgent
Strategy		
Are concurrent review policies the same for both in-network and out-of-network providers?	Yes. However, IP services for DHMP members admitting to Denver Health Hospital do not require authorization.	No authorizations required in-network except for certain procedures (listed in IP M/S PAR), all out-of-network care requires authorization.
Evidentiary Services		
Does the plan use nationally recognized evidence-based clinical decision support products (InterQual, Milliman, etc.) to make decisions regarding concurrent review for inpatient services?	InterQual for MH and ASAM for SUD	MCG for M/S
Does the plan use internally developed guidelines to determine whether to concurrently review services? IF YES: How frequently are those guidelines updated?	No	No

Concurrent Review

Findings: Scenario 4 – Inpatient Services

The inpatient concurrent review policies and procedures regarding exception policies and evidentiary standards for MH/SUD services are substantially similar to the policies and procedures of M/S services and follow standard industry practice. The authorization determination timeframes used for MH/SUD and M/S services are based upon timeframes set by state and federal, as well as nationally-recognized industry standards of practice. So, while the timeframes for determination may be different, these policies and procedures applied to MH/SUD and M/S services have not been found to be more stringent nor create a barrier to access to care for members. The estimated timeframes for frequency of concurrent review are different, but they are both established based on the type of service, intensity of the service, and member acuity, and verified against clinical decision support product recommendations.

Authorization requirement policies for MH/SUD and M/S, as they apply to in-network and out-of-network services, are substantially similar and in some cases more restrictive for M/S.

It is determined that these policies and procedures are parity compliant.

CONCURRENT REVIEW

SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO

QUESTION	MH/SUD	M/S
Outpatient Services		
Process		
Are services in this classification subject to concurrent review?	Only the following OP services require ongoing review for continued need of services: Acute Treatment unit, Mental health residential treatment, SUD residential treatment, Intensive Outpatient, Partial hospitalization, Electroconvulsive therapy, Day treatment	In-network services subject to authorization: DME rental and purchase if greater than $500, Home health care greater than day 31-59, Early intervention services. Enteral and Oral Nutrition Supplements, Outpatient Therapy - days 31+ until discharge Transplant follow up care All out-of-network services require authorization.
How frequently is concurrent review required for services in this classification?	Depends on the service. 3-5 days for acute / short-term services, 7-30 days for long-term / intensive services	OP M/S services are approved for the initial requested time period. If additional services are needed after that time period, an additional authorization request would need to be submitted.

CONCURRENT REVIEW SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
		Timeframe is dependent on member's presentation, progress made, and service needed.
What is the maximum amount of time allowed to issue a determination on a concurrent review request?	10 days for standard, 72 hours for urgent	10 days for standard, 72 hours for urgent
Strategy		
Are concurrent review policies the same for both in-network and out-of-network providers?	Yes	No authorizations required in-network, all out-of-network care requires authorization.
Evidentiary Services		
Does the plan use nationally recognized evidence-based clinical decision support products (InterQual, Milliman, etc.) to make decisions regarding concurrent review for outpatient services?	InterQual for MH ASAM for SUD	MCG, Hayes Knowledge Center, and Uptodate
Does the plan use internally developed guidelines to determine whether to concurrently review services? IF YES: How frequently are those guidelines updated?	No	Oral/enteral nutrition and sleep apnea. All other types of care DHMC uses MCG. Reviewed annually.

Concurrent Review

Findings: Scenario 4 – Outpatient Services

Routine MH/SUD outpatient services do not require authorization. Some specialty and/or higher acuity outpatient services do require authorization, consistent with industry standards, to assure that the member cannot be treated in a less restrictive environment. The health plan subjects certain M/S services to concurrent review to ensure a member continues to meet the criteria for medical necessity.

The outpatient concurrent review policies and procedures regarding exception policies, determination timeframes, and evidentiary standards for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice. The estimated timeframes for frequency of concurrent review are different, but they are both established based on the type of service, intensity of the service, and member acuity, and verified against clinical decision support product recommendations.

Authorization requirement policies for MH/SUD and M/S, as they apply to in-network and out-of-network services are substantially similar.

It is determined that these policies and procedures are parity compliant.

Appendix C – Retrospective Review

Description: Retrospective review (RR) is a protocol for approving a service after it has been delivered. *Note that no emergency services require prior authorization.*

Tools for Analysis: Data request, interviews with health plan staff, and policies/procedures documents referencing services/conditions that trigger RR, utilization management policies, reviewer qualifications.

Summary of Results: The following table illustrates the characteristics of each scenario including health plans being compared, applicable benefit categories, whether differences were found in the analysis, and compliance finding.

	Used by	Benefit Categories	Differences between M/S and MH/SUD	Compliance Determined
Scenario 1	HCPF	IP, OP	No	✓Yes
Scenario 2	RMHP and Prime MCO	IP, OP	No	✓Yes
Scenario 3	RAE 1	IP, OP	No	✓Yes
	RAE 2 and 4	IP, OP	No	✓Yes
	RAE 3 and 5	IP, OP	No	✓Yes
	RAE 6 and 7	IP, OP	No	✓Yes
Scenario 4	Denver PIHP and Denver Health MCO	IP, OP	Yes. See tables	✓ Yes

Results by Scenario: On the following pages, each scenario is expanded into an overview of primary policies that impact this NQTL.

Scenario 1: Retrospective Review

RETROSPECTIVE REVIEW SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
Inpatient Services		
Process		
Is there a time limit on how far in the past services can be retrospectively reviewed? If so, what is that limit?	Time limits for RR are currently waived.	Time limits for RR are currently waived.
Are services in this classification subject to retrospective review?	All benefits that require a PAR may be considered for RR on a case by case basis	All benefits that require a PAR may be considered for RR on a case by case basis
What is the maximum amount of time allowed to issue a determination on a retrospective review request?	10 business days	10 business days
Strategy		
Are retrospective review policies the same for both in-network and out-of-network providers?	Yes[54]	Yes[55]
Evidentiary Services		
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to make decisions regarding retrospective review for inpatient services?	The FFS UM Vendor uses InterQual and MCG.	The FFS UM Vendor uses InterQual and MCG.
Does the plan use internally developed guidelines to determine whether to prior retrospectively review services? IF YES: How frequently are those guidelines updated?	Yes, when no InterQual or MCG criteria is available. Reviewed regularly and updated as evidence/best practices change.	Yes, when no InterQual or MCG criteria is available. Reviewed regularly and updated as evidence/best practices change.

Retrospective Review

Findings: Scenario 1 – Inpatient Services

The goals of Colorado Medicaid's Utilization Management Program are to improve members' quality of care and ensure members are receiving the right service at the right time for the right duration in the right setting. In some situations, HCPF's guidance overrides and allows a retrospective review. And in some cases, a member may not be eligible for Colorado Medicaid

[54] The term in-network and out-of-network is not used by FFS UM since the ColoradoPAR program serves the entire state of Colorado and look at in-state and out-of-state (OOS) providers. Some border facilities are considered in-state. Both OOS and in-state providers need to be enrolled with Medicaid to bill for services and the authorization policies are the same.
[55] Ibid.

at the time of admission, but retroactive eligibility is obtained while the member is hospitalized or post discharge. A retrospective authorization will be required as soon as the inpatient facility becomes aware of the member's eligibility.

The inpatient retrospective review policies and procedures regarding time limits, exception policies, determination timeframes, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services are the same as the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

RETROSPECTIVE REVIEW **SCENARIO 1: HCPF FFS**		
QUESTION	**MH/SUD**	**M/S**
Outpatient Services		
Process		
Is there a time limit on how far in the past services can be retrospectively reviewed? If so, what is that limit?	Time limits for RR are currently waived. Two exceptions to this policy is that, by rule, DME has 90 days and long term health has 10 days.	Time limits for RR are currently waived. Two exceptions to this policy is that, by rule, DME has 90 days and long term health has 10 days.
Are services in this classification subject to retrospective review?	All benefits that require a PAR may be considered for an exception to establishes timeliness rules to allow for a retrospective review on a case by case basis.	All benefits that require a PAR may be considered for an exception to establishes timeliness rules to allow for a retrospective review on a case by case basis.
What is the maximum amount of time allowed to issue a determination on a retrospective review request?	There is no established maximum	There is no established maximum
Strategy		
Are retrospective review policies the same for both in-network and out-of-network providers?	Yes	Yes
Evidentiary Services		
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to make decisions regarding retrospective review for outpatient services?	The FFS UM Vendor uses InterQual and MCG.	The FFS UM Vendor uses InterQual and MCG.
Does the plan use internally developed guidelines to determine whether to retrospectively review services? IF YES: How frequently are those guidelines updated?	Yes, when no InterQual or MCG criteria is available. Reviewed regularly and updated as evidence/best practices change.	Yes, when no InterQual or MCG criteria is available. Reviewed regularly and updated as evidence/best practices change.

Retrospective Review

Findings: Scenario 1 – Outpatient Services

The goals of Colorado Medicaid's Utilization Management Program are to improve members' quality of care and ensure members are receiving the right service at the right time for the right duration in the right setting. In some situations, HCPF's guidance overrides and allows a retrospective review. And in some cases, a member may not be eligible for Colorado Medicaid at the time of admission, but retroactive eligibility is obtained while the member is hospitalized or post discharge. A retrospective authorization will be required as soon as the inpatient facility becomes aware of the member's eligibility.

The outpatient retrospective review policies and procedures regarding time limits, exception policies, determination timeframes, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services are the same as the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 2: Retrospective Review

RETROSPECTIVE REVIEW

SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO

QUESTION	MH/SUD	M/S
Inpatient Services		
Process		
Is there a time limit on how far in the past services can be retrospectively reviewed? If so, what is that limit?	No, but claims must be submitted within 120 days	No, but claims must be submitted within 120 days
Are services in this classification subject to retrospective review?	Only services that require PAR would need RR.	Only services that require PAR would need RR.
What is the maximum amount of time allowed to issue a determination on a retrospective review request?	30 days	30 days
Strategy		
Are retrospective review policies the same for both in-network and out-of-network providers?	No, in-network providers only RR services that require PAR if PAR was not obtained. OON providers must RR for any service not PAR'd.	No, in-network providers only RR services that require PAR if PAR was not obtained. OON providers must RR for any service not PAR'd.
Evidentiary Services		
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to make decisions	MCG for MH and ASAM for SUD.	MCG for M/S

RETROSPECTIVE REVIEW SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
regarding retrospective review for inpatient services?		
Does the plan use internally developed guidelines to determine whether to prior retrospectively review services? IF YES: How frequently are those guidelines updated?	Yes, for some IP MH/SUD services. Updated annually at minimum[56]	Yes, for some IP M/S services. Updated annually at minimum.

Retrospective Review

Findings: Scenario 2 – Inpatient Services

The health plan uses retrospective review to monitor and prevent potential overutilization and underutilization, manage high-cost and prolonged-duration services, ensure enrollee safety, determine the appropriate level of care was utilized, and determine whether the service or item was medically necessary.

The inpatient retrospective review policies and procedures regarding time limits, exception policies, determination timeframes, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services are substantially similar to the policies and procedures of M/S services and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

RETROSPECTIVE REVIEW SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
Outpatient Services		
Process		
Is there a time limit on how far in the past services can be retrospectively reviewed? If so, what is that limit?	No, but claims must be submitted within 120 days of services being rendered.	No, but claims must be submitted within 120 days of services being rendered.
Are services in this classification subject to retrospective review?	Only services that require PAR would need RR.	Only services that require PAR would need RR.

[56] This is a change for the 2024 Report. There is an internally developed guideline for Eating Disorder Treatment, created in collaboration with HCPF. The change was in response to Colorado Senate Bill 23-176.

RETROSPECTIVE REVIEW SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
What is the maximum amount of time allowed to issue a determination on a retrospective review request?	30 days	30 days
Strategy		
Are retrospective review policies the same for both in-network and out-of-network providers?	No, in-network providers only RR services that require PAR if PAR was not obtained. OON providers must RR for any service not PAR'd.	No, in-network providers only RR services that require PAR if PAR was not obtained. OON providers must RR for any service not PAR'd.
Evidentiary Services		
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to make decisions regarding retrospective review for outpatient services?	MCG for MH and ASAM for SUD	MCG for M/S
Does the plan use internally developed guidelines to determine whether to retrospectively review services? IF YES: How frequently are those guidelines updated?	No	Yes, for some OP M/S services. Updated annually at minimum.

Retrospective Review

Findings: Scenario 2 – Outpatient Services

The health plan uses retrospective review to monitor and prevent potential overutilization and underutilization, manage high-cost and prolonged-duration services, ensure enrollee safety, determine the appropriate level of care was utilized, and determine whether the service or item was medically necessary.

The outpatient retrospective review policies and procedures regarding time limits, exception policies, determination timeframes, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 3: Retrospective Review

RETROSPECTIVE REVIEW SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
Inpatient Services					
Process					
Is there a time limit on how far in the past services can be retrospectively reviewed? If so, what is that limit?	No. But claims must be submitted within 120 days to be paid[57]	120 days	90 days. Timely filing is 120 days but a provider must submit a RR request within 90 days of the treatment service to allow UM the 30 days to issue a determination.	120 days for claims for in-network providers. Out-of-network providers have 365 days	Time limits for RR are currently waived. Two exceptions to this policy is that, by rule, DME has 90 days and long term health has 10 days.
Are services in this classification subject to retrospective review?	All services subject to PAR may be considered for RR if PAR was not obtained.	All IP services may be considered for RR	All IP services may be considered for RR[58]	All IP services may be considered for RR There are extensions when members become retroactively eligible for Medicaid	All services subject to PAR may be considered for RR if PAR was not obtained. These are considered on a case by case basis

[57] There is not a specific time limit on retrospective review. RMHP follows NCQA standards in this area which require that they complete a medical necessity review for any authorization request regardless of when it was submitted. However, there is a time limit on claims submission for payment. Claims must be submitted within 120 days of services being rendered in order to be paid.
[58] COA can retrospectively review any service to determine if medical necessity was met. However, this is fairly uncommon and would be initiated by COA based on utilization patterns or outliers, not requested by the provider or member. Typically, the only retrospective requests initiated by the provider are situations in which prior authorization was not requested, either by provider error or due to confusion around the member's eligibility.

RETROSPECTIVE REVIEW SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
What is the maximum amount of time allowed to issue a determination on a retrospective review request?	30 days	30 days	30 days	30 days	10 days
Strategy					
Are retrospective review policies the same for both in-network and out-of-network providers?	No, for in-network providers only those services that require PAR would need RR if PAR was not obtained. OON providers must submit RR for any service not PAR'd.	Yes	Yes	Yes	Yes[59]
Evidentiary Services					
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to make decisions regarding retrospective review for inpatient services?	MCG for MH and ASAM for SUD	InterQual for MH and ASAM for SUD	InterQual for MH and ASAM for SUD	MCG for MH and ASAM for SUD	InterQual and MCG for M/S

[59] The term in-network and out-of-network is not used by FFS UM since the ColoradoPAR program serves the entire state of Colorado and look at in-state and out-of-state (OOS) providers. Some border facilities are considered in-state. Both OOS and in-state providers need to be enrolled with Medicaid to bill for services and the authorization policies are the same.

RETROSPECTIVE REVIEW SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
Does the plan use internally developed guidelines to determine whether to prior retrospectively review services? IF YES: How frequently are those guidelines updated?	Yes, for some IP MH/SUD services. Updated annually at minimum.[60]	No	No	No	Yes, when no InterQual or MCG criteria is available. Reviewed regularly and updated as evidence/best practices change.

Retrospective Review

Findings: Scenario 3 – Inpatient Services

The inpatient retrospective review policies and procedures regarding exception policies, determination timeframes, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice. The time limit policies on how far in the past services can be retrospectively reviewed are different, but are industry standard with appropriate lengths for providers to receive payment.

It is determined that these policies and procedures are parity compliant.

[60] This is a change for the 2024 Report. There is an internally developed guideline for Eating Disorder Treatment, created in collaboration with HCPF. The change was in response to Colorado Senate Bill 23-176.

RETROSPECTIVE REVIEW SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
Outpatient Services					
Process					
Is there a time limit on how far in the past services can be retrospectively reviewed? If so, what is that limit?	No, but claims must be submitted within 120 days of services being rendered.	30 days	90 days. Timely filing is 120 days but a provider must submit a RR request within 90 days of the treatment service to allow UM the 30 days to issue a determination.	30 days	Time limits for RR are currently waived, except, by rule, DME has 90 days; long term health has 10 days.
Are services in this classification subject to retrospective review?	All services subject to PAR may be considered for RR if PAR not obtained.	All services subject to PAR may be considered for RR if PAR not obtained. Exceptions reviewed by the UM Director, Provider Relations Director and VP of Ops for extenuating circumstances.	All services subject to PAR may be considered for RR if PAR not obtained.	Yes. Extensions exist when members become retroactively eligible for Medicaid. Provider has 30 days from the date they learn of eligibility to submit retrospective review request.	All benefits that require a PAR may be considered for an exception to establishes timeliness rules to allow for a retrospective review on a case by case basis.
What is the maximum amount of time allowed to issue a determination on a retrospective review request?	30 days	30 days	30 days	30 days	There is no established maximum
Strategy					
Are retrospective review policies the same for both	No, for in-network providers only, services requiring	Yes	Yes	Yes	Yes

RETROSPECTIVE REVIEW SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
in-network and out-of-network providers?	PAR would need RR if PAR was not obtained. OON providers must submit RR for any service not PAR'd.				
Evidentiary Services					
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to make decisions regarding retrospective review for outpatient services?	MCG for MH and ASAM for SUD	InterQual for MH and ASAM for SUD	InterQual for MH and ASAM for SUD	MCG for MH and ASAM for SUD	InterQual and MCG for M/S
Does the plan use internally developed guidelines to determine whether to retrospectively review services? IF YES: How frequently are those guidelines updated?	No	No	No	No	Yes, when no InterQual or MCG criteria is available. Reviewed regularly and updated as evidence/ best practices change.

Retrospective Review

Findings: Scenario 3 – Outpatient Services

The outpatient retrospective review policies and procedures regarding exception policies, determination timeframes, in-network vs out-of-network policies, and evidentiary standards for MH/SUD services are substantially similar to the policies and procedures of M/S services and follow standard industry practice. The time limit policies on how far in the past services can be retrospectively reviewed are different but are industry standard with appropriate lengths for providers to receive payment.

It is determined that these policies and procedures are parity compliant.

Scenario 4: Retrospective Review

RETROSPECTIVE REVIEW SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
Inpatient Services		
Process		
Is there a time limit on how far in the past services can be retrospectively reviewed? If so, what is that limit?	120 days for timely filing 90 days for submitting retrospective reviews	12 calendar months
Are services in this classification subject to retrospective review?	Yes	Yes
What is the maximum amount of time allowed to issue a determination on a retrospective review request?	30 calendar days	30 calendar days
Strategy		
Are retrospective review policies the same for both in-network and out-of-network providers?	Yes. However, inpatient services for DHMP members admitting to Denver Health Hospital do not require authorization.	Authorizations are not required in-network, all out-of-network care requires authorization.
Evidentiary Services		
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to make decisions regarding retrospective review for inpatient services?	InterQual for MH and ASAM for SUD	MCG for M/S
Does the plan use internally developed guidelines to determine whether to prior retrospectively review services? IF YES: How frequently are those guidelines updated?	No	No

Retrospective Review

Findings: Scenario 4 – Inpatient Services

Consistent with industry standards, the health plan performs reviews of MH/SUD to assure the member is being treated in the least restrictive environment appropriate for their condition. Typical M/S retrospective reviews allow for extenuating circumstances such as unconscious at arrival, no identification at time of admission, or the facility being unable to determine correct payer.

The inpatient retrospective review policies and procedures regarding exception policies, determination timeframes, and evidentiary standards for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice.

The time limit policies on how far in the past services can be retrospectively reviewed are different, but are appropriate lengths for providers to receive payment.

Authorization requirement policies for MH/SUD and M/S, as they apply to in-network and out-of-network services, are substantially similar and in some cases more restrictive for M/S.

It is determined that these policies and procedures are parity compliant.

RETROSPECTIVE REVIEW

SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO

QUESTION	MH/SUD	M/S
Outpatient Services		
Process		
Is there a time limit on how far in the past services can be retrospectively reviewed? If so, what is that limit?	120 days for timely filing 90 days for submitting retrospective reviews	12 calendar months
Are services in this classification subject to retrospective review?	Only services subject to PAR may be considered for RR	Only services subject to PAR may be considered for RR
What is the maximum amount of time allowed to issue a determination on a retrospective review request?	30 calendar days	30 calendar days
Strategy		
Are retrospective review policies the same for both in-network and out-of-network providers?	Yes	Authorizations are not required in-network, all services out-of-network care requires authorization.
Evidentiary Services		
Does the plan use evidence-based clinical decision support products (InterQual, Milliman, etc.) to make decisions regarding retrospective review for outpatient services?	InterQual for MH and ASAM for SUD	MCG, Hayes Knowledge Center, Uptodate
Does the plan use internally developed guidelines to determine whether to retrospectively review services? IF YES: How frequently are those guidelines updated?	No	No

Retrospective Review

Findings: Scenario 4 - Outpatient Services

Routine MH/SUD outpatient services do not require authorization. Some specialty and/or higher acuity outpatient services do require authorization, consistent with industry standards,

to assure that the member cannot be treated in a less restrictive environment. Typical M/S retrospective reviews allow for extenuating circumstances such as unconscious at arrival, no identification at time of admission, or the facility being unable to determine correct payer.

The outpatient retrospective review policies and procedures regarding exception policies, determination timeframes, and evidentiary standards for MH/SUD services are substantially similar to the policies and procedures of M/S services and follow standard industry practice. The time limit policies on how far in the past services can be retrospectively reviewed are different but are industry standard with appropriate lengths for providers to receive payment.

Authorization requirement policies for MH/SUD and M/S, as they apply to in-network and out-of-network services are substantially similar.

It is determined that these policies and procedures are parity compliant.

Appendix D – Medical Necessity Criteria

Description: Use and applicability of health plan standards and review policies that determine enrollment and authorization for benefits/services. *Note that emergency care is not subject to review for authorization.*

Tools for Analysis: Data request, interviews with health plan staff, and policies/procedures documents referencing protocols for selection of criteria (i.e., utilization of industry-standard criteria) to assess medical necessity for M/S and MH/SUD benefits. Review of compliance with HCPF-defined medical necessity criteria and directives.

Summary of Results: The following table illustrates the characteristics of each scenario including health plans being compared, applicable benefit categories, whether differences were found in the analysis, and compliance finding.

	Used by	Benefit Categories	Differences between M/S and MH/SUD	Compliance Determined
Scenario 1	HCPF	IP, OP	No	✓Yes
Scenario 2	RMHP and Prime MCO	IP, OP, PD	No	✓Yes
Scenario 3	RAE 1	IP, OP	No	✓Yes
	RAE 2 and 4	IP, OP	No	✓Yes
	RAE 3 and 5	IP, OP	No	✓Yes
	RAE 6 and 7	IP, OP	Yes. See tables below.	✓Yes
Scenario 4	Denver PIHP and Denver Health MCO	IP, OP, PD	No	✓Yes

Results by Scenario: On the following pages, each scenario is expanded into an overview of primary policies that impact this NQTL.

Scenario 1: Medical Necessity Criteria

MEDICAL NECESSITY CRITERIA **SCENARIO 1: HCPF FFS**		
QUESTION	**MH/SUD**	**M/S**
Which evidence-based clinical decision support products (InterQual, Milliman, etc.) does the plan use to determine the medical necessity of services and to which benefit classifications do these criteria apply? (inpatient, outpatient, emergency care, prescription drugs)	IP and OP MH/SUD: InterQual and MCG	IP and OP M/S: InterQual, MCG, and internal guidelines. If there is not existing criteria available in MCG, InterQual or state specific criteria developed, the medical necessity review is completed at the Physician Review Level (in most instances by a physician specialized in that area of the benefit being requested).
Does the plan's definition for medical necessity for individuals age 21 and over follow the state's definition for medical necessity?	Yes	Yes
Does the plan's definition for medical necessity for individuals UNDER the age of 21 follow the state's definition for medical necessity?	Yes	Yes

Medical Necessity Criteria

Findings: Scenario 1

The medical necessity criteria policies and procedures regarding evidentiary standards and medical necessity definitions for MH/SUD services are the same as the policies and procedures of M/S services and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 2: Medical Necessity Criteria

MEDICAL NECESSITY CRITERIA **SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO**		
QUESTION	**MH/SUD**	**M/S**
Which evidence-based clinical decision support products (InterQual, Milliman, etc.) does the plan use to determine the medical necessity of services and to which benefit classifications do these criteria apply?	IP and OP MH: MCG All SUD: ASAM	IP and OP M/S: MCG and internal guidelines

MEDICAL NECESSITY CRITERIA

SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO

QUESTION	MH/SUD	M/S
(inpatient, outpatient, emergency care, prescription drugs)	Pharmacy: Criteria is based on internally developed guidelines.[61]	Pharmacy: Criteria is based on internally developed guidelines.[62]
Does the plan's definition for medical necessity for individuals age 21 and over follow the state's definition for medical necessity?	Yes	Yes
Does the plan's definition for medical necessity for individuals UNDER the age of 21 follow the state's definition for medical necessity?	Yes	Yes

Medical Necessity Criteria

Findings: Scenario 2

The health plan's process to evaluate medical necessity criteria drugs does not consider if the drug is a behavior health or medical indication. All drugs are evaluated based on the same criteria which includes clinical information of the specific drug, tertiary sources (e.g. National guidelines, FDA), expert opinion, pharmacoeconomic evaluations/health outcomes, and quality of life studies.

The medical necessity criteria policies and procedures regarding evidentiary standards and medical necessity definitions for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant

[61] Pharmacy for both MH/SUD and M/S: Criteria for medical necessity is determined during P&T (pharmacy & therapeutics committee) review of the drug. Utilization management (UM) strategies include PA (prior authorization, ST (step therapy/fail first), QL (quantity limit), Age, etc. Criteria is developed from various sources including but not limited to FDA approved PI, clinical guidelines (e.g. ADA, NCCN, ACIP, etc.), clinical trials, and professional opinion. Requirements are communicated via the formulary and drug specific forms that outline criteria. There is also an exception process that allows members/providers to ask for a drug that is not included on the formulary called a formulary exception (FE). When either a UM or FE is submitted, review of the case occurs to decide if coverage is supported. UM has more specific guidelines to follow whereas an FE requires a provider to make the case that either formulary options would not be appropriate due to specific member requirements (contraindicated) or that at least two formulary options have already been tried and failed due to lack of efficacy or adverse effect. Pharmacy guidelines are internally developed within United Healthcare (UHC).

[62] Ibid.

Scenario 3: Medical Necessity Criteria

MEDICAL NECESSITY CRITERIA SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
Which evidence-based clinical decision support products (InterQual, Milliman, etc.) does the plan use to determine the medical necessity of services and to which benefit classifications do these criteria apply? (inpatient, outpatient, emergency care, prescription drugs)	IP & OP MH: MCG IP & OP SUD: ASAM Criteria Emergency care is not reviewed	IP & OP MH: InterQual IP & OP SUD: ASAM Emergency care is not reviewed	IP & OP MH: InterQual IP & OP SUD: ASAM Emergency care is not reviewed	IP & OP MH: MCG IP & OP SUD: ASAM Criteria Emergency care is not reviewed	IP and OP M/S: InterQual, MCG, and internal guidelines. If there is not existing criteria available in MCG, InterQual or state specific criteria developed, the medical necessity review is completed at the Physician Review Level (in most instances by a physician specialized in that area of the benefit being requested).
Does the plan's definition for medical necessity for individuals age 21 and over follow the state's definition for medical necessity?	Yes	Yes	Yes	Yes[63]	Yes
Does the plan's definition for medical necessity for	Yes	Yes	Yes	Yes	Yes

[63] RAE 6 & 7 use the state's EPSDT definition for medical necessity for both under and over 21 years of age, as the language is appropriate for both populations.

MEDICAL NECESSITY CRITERIA SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
individuals UNDER the age of 21 follow the state's definition for medical necessity?					

Medical Necessity Criteria

Findings: Scenario 3

The medical necessity criteria policies and procedures regarding evidentiary standards and medical necessity definitions for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice. RAE 6 & 7 use the state's EPSDT definition for medical necessity for both adults and individuals under 21 years of age. This difference in policy was not found to apply greater stringency for MH/SUD services nor create a barrier to access to care for members.

It is determined that these policies and procedures are parity compliant.

Scenario 4: Medical Necessity Criteria

MEDICAL NECESSITY CRITERIA **SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO**		
QUESTION	**MH/SUD**	**M/S**
Which evidence-based clinical decision support products (InterQual, Milliman, etc.) does the plan use to determine the medical necessity of services and to which benefit classifications do these criteria apply? (inpatient, outpatient, emergency care, prescription drugs)	IP/OP MH: InterQual IP/OP SUD: ASAM	IP/OP/PD: MCG
Does the plan's definition for medical necessity for individuals age 21 and over follow the state's definition for medical necessity?	Yes	Yes
Does the plan's definition for medical necessity for individuals UNDER the age of 21 follow the state's definition for medical necessity?	Yes	Yes

Medical Necessity Criteria

Findings: Scenario 4

The medical necessity criteria policies and procedures regarding evidentiary standards and medical necessity definitions for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Appendix E – Medical Appropriateness Review

Description: The policy and process the health plan utilizes to determine participant services and benefits. *Note that emergency care is not subject to review for authorization.*

Tools for Analysis: Data request, interviews with health plan staff, and policies/procedures documents referencing utilization of clinically-validated medical necessity criteria, reviewer qualifications, and availability of medical necessity criteria.

Summary of Results: The following table illustrates the characteristics of each scenario including health plans being compared, applicable benefit categories, whether differences were found in the analysis, and compliance finding.

	Used by	Benefit Categories	Differences between M/S and MH/SUD	Compliance Determined
Scenario 1	HCPF	IP, OP	No	✓Yes
Scenario 2	RMHP and Prime MCO	IP, OP, PD	No	✓Yes
Scenario 3	RAE 1	IP, OP	No	✓Yes
	RAE 2 and 4	IP, OP	No	✓Yes
	RAE 3 and 5	IP, OP	No	✓Yes
	RAE 6 and 7	IP, OP	No	✓Yes
Scenario 4	Denver PIHP and Denver Health MCO	IP, OP	No	✓Yes

Results by Scenario: On the following pages, each scenario is expanded into an overview of primary policies that impact this NQTL.

Scenario 1: Medical Appropriateness Review

MEDICAL APPROPRIATENESS REVIEW SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
Which benefit classifications does the plan have services subject to this NQTL? (inpatient, outpatient, emergency care, prescription drugs)	IP, OP	IP, OP
What is the process for determining medical appropriateness for individuals OVER the age of 21?	Review submitted information for completeness, compliance and medical appropriateness utilizing specific HCPF inpatient policy, guidelines, and the appropriate criteria by the first and second level reviewers.[64]	Review submitted information for completeness, compliance and medical appropriateness utilizing specific HCPF inpatient policy, guidelines, and the appropriate criteria by the first and second level reviewers.[65]
What is the process for determining medical appropriateness for individuals UNDER the age of 21?	Same as above, but also follows EPSDT guidance in any review for a member under 21. This process is built into every PAR review for a member 20 and under automatically.	Same as above, but also follows EPSDT guidance in any review for a member under 21. This process is built into every PAR review for a member 20 and under automatically.
Do you use a two-level review process?	Yes	Yes
Who performs the medical appropriateness reviews? Please include who can approve/deny and the qualifications of the reviewers.	1st level: BCBA can pend, approve, technically deny, refer to 2nd level. 2nd level- BCBA-D can deny for medical necessity or technical, can approve or pend.	1st level: RN or other appropriately licensed personnel for certain benefits can pend, approve, technically deny, refer to 2nd level.

[64] First Level Reviewers for PBT consist of a Board-Certified Behavioral Analyst (BCBA) who may: Approve the service as requested based HCPF approved criteria, and compliance to policies and federal guidelines, Request additional information from the Provider to support the request, Refer the request to a physician reviewer-If the nurse reviewer believes that the request may not meet medical necessity, should be denied for medical necessity, or would like further input from a physician reviewer, they will refer it for further review and determination (2nd level Review), Deny the request for technical reasons, including failing to provide the necessary documentation, not submitting the request timely, and/or if the request is a duplicate, etc. First Level Reviewers cannot deny for lack of medical necessity. Second Level Reviewers for PBT consist of Board-Certified Behavior Analyst-Doctoral (BCBA-Doctoral) who may: Approve the service as requested based on HCPF approved Criteria, and compliance to policies and federal guidelines, Request additional information from the Provider to support the request, Render either a full or partial denial for lack of medical necessity.

[65] First Level Reviewers consist of Registered Nurses who may: Approve the service as requested based on MCG/InterQual or HCPF approved criteria, and compliance to policies and federal guidelines, Request additional information from the Provider to support the request. Refer the request to a physician reviewer-If the nurse reviewer believes that the request may not meet medical necessity, should be denied for medical necessity, or would like further input from a physician reviewer, they will refer it for further review and determination (2nd level Physician Review)., Deny the request for technical reasons, including failing to provide the necessary documentation, not submitting the request timely, and/or if the request is a duplicate, etc. First Level Reviewers cannot deny for lack of medical necessity. Second Level Reviewers consist of Physicians who may: Approve the service as requested based on MCG/InterQual or HCPF approved Criteria, and compliance to policies and federal guidelines, Request additional information from the Provider to support the request, Render either a full or partial denial for lack of medical necessity.

MEDICAL APPROPRIATENESS REVIEW SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
		2nd level- physician can deny for medical necessity or technical, can approve or pend.

Medical Appropriateness

Findings: Scenario 1

The medical appropriateness review policies and procedures regarding classifications, processes for determination, two-level review, and reviewer qualifications for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 2: Medical Appropriateness Review

MEDICAL APPROPRIATENESS REVIEW SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
Which benefit classifications does the plan have services subject to this NQTL? (inpatient, outpatient, emergency care, prescription drugs)	IP, OP, PD	IP, OP, PD
What is the process for determining medical appropriateness for individuals OVER the age of 21?	IP/OP: Clinical Coordinators (CC) receive and review clinical documentation from the provider or facility requesting services for the member and compares it to the appropriate medical necessity guidelines (MCG or ASAM Criteria) and the Colorado Medicaid medical necessity criteria to determine if the request is medically appropriate. CCs cannot deny cases for medical necessity. The process is the same for MH/SUD and M/S. Pharmacy: Medical necessity reviews are completed at a variety of medical professional levels. The initial case review	IP/OP: Clinical Coordinators (CC) receive and review clinical documentation from the provider or facility requesting services for the member and compares it to the appropriate medical necessity guidelines (MCG or ASAM Criteria) and the Colorado Medicaid medical necessity criteria to determine if the request is medically appropriate. CCs cannot deny cases for medical necessity. The process is the same for MH/SUD and M/S. Pharmacy: Medical necessity reviews are completed at a variety of medical professional levels. The initial case review

MEDICAL APPROPRIATENESS REVIEW SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
	is completed by a certified pharmacy tech (CPhT) that identifies applicable information from what the prescriber provided. If the CPhT is able to approve, the pharmacy tech will approve. If the CPhT cannot approve based on the guideline criteria, the case is forwarded to a Pharmacist for further review. The initial review is completed by the pharmacist. CPhTs cannot deny cases for medical necessity.	is completed by a certified pharmacy tech (CPhT) that identifies applicable information from what the prescriber provided. If the CPhT is able to approve, the pharmacy tech will approve. If the CPhT cannot approve based on the guideline criteria, the case is forwarded to a Pharmacist for further review. The initial review is completed by the pharmacist. CPhTs cannot deny cases for medical necessity.
What is the process for determining medical appropriateness for individuals UNDER the age of 21?	IP/OP: Clinical Coordinators (CC) receive and review clinical documentation from the provider or facility requesting services for the member and compares it to the appropriate medical necessity guidelines (MCG or ASAM Criteria) and the Colorado Medicaid medical necessity criteria for youth under 20 to determine if the request is medically appropriate. CCs cannot deny cases for medical necessity. The process is the same for MH/SUD and M/S. Pharmacy: Medical necessity reviews are completed at a variety of medical professional levels. The initial case review is completed by a certified pharmacy tech (CPhT) that identifies applicable information from what the prescriber provided. If the CPhT is able to approve, the pharmacy tech will approve. If the CPhT cannot approve based on the guideline criteria, the case is forwarded to a Pharmacist for further review. The initial review is completed by the pharmacist. CPhTs	IP/OP: Clinical Coordinators (CC) receive and review clinical documentation from the provider or facility requesting services for the member and compares it to the appropriate medical necessity guidelines (MCG or ASAM Criteria) and the Colorado Medicaid medical necessity criteria for youth under 20 to determine if the request is medically appropriate. CCs cannot deny cases for medical necessity. The process is the same for MH/SUD and M/S. Pharmacy: Medical necessity reviews are completed at a variety of medical professional levels. The initial case review is completed by a certified pharmacy tech (CPhT) that identifies applicable information from what the prescriber provided. If the CPhT is able to approve, the pharmacy tech will approve. If the CPhT cannot approve based on the guideline criteria, the case is forwarded to a Pharmacist for further review. The initial review is completed by the pharmacist. CPhTs

MEDICAL APPROPRIATENESS REVIEW SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
	cannot deny cases for medical necessity.	cannot deny cases for medical necessity.
Do you use a two-level review process?	Yes, RMHP uses a two level review process. CCs or CPhTs complete the first review and if it appears a request is not meeting medical necessity, it is sent to a medical director or pharmacist for a second level review.	Yes, RMHP uses a two level review process. CCs or CPhTs complete the first review and if it appears a request is not meeting medical necessity, it is sent to a medical director or pharmacist for a second level review.
Who performs the medical appropriateness reviews? Please include who can approve/deny and the qualifications of the reviewers.	Clinical Coordinators can approve authorizations but cannot deny authorizations for medical necessity. All Clinical Coordinators that work on the Prime line of business are licensed behavioral health clinicians (LPC, LMFT, LCSW) or RNs with psychiatric experience. All Clinical Coordinators are licensed in Colorado. Medical directors can approve or deny authorizations. Both Medical Directors that work on the Prime line of business are licensed physicians who hold an unrestricted license to practice in the state of Colorado and are board certified in psychiatry. One of the medical directors is also board certified in addiction medicine. Pharmacy: Medical necessity reviews are completed at a variety of medical professional levels. The initial case review is completed by a certified pharmacy tech (CPhT) that identifies applicable information from what the prescriber provided. If the CPhT is able to approve, the pharmacy tech will approve. If the CPhT cannot approve based on the guideline criteria, the case is forwarded to a	Clinical Coordinators can approve authorizations but cannot deny authorizations for medical necessity. All Clinical Coordinator that work on the Prime line of business are licensed RNs with licensure in Colorado. Medical directors can approve or deny authorizations. The Medical Directors that work on the Prime line of business are licensed physicians who hold an unrestricted license to practice in the state of Colorado. Pharmacy: Medical necessity reviews are completed at a variety of medical professional levels. The initial case review is completed by a certified pharmacy tech (CPhT) that identifies applicable information from what the prescriber provided. If the CPhT is able to approve, the pharmacy tech will approve. If the CPhT cannot approve based on the guideline criteria, the case is forwarded to a Pharmacist for further review. The initial review is completed by the pharmacist.

MEDICAL APPROPRIATENESS REVIEW SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
	Pharmacist for further review. The initial review is completed by the pharmacist.	

Medical Appropriateness Review

Findings: Scenario 2

The medical appropriateness review policies and procedures regarding classifications, processes for determination, two-level review, and reviewer qualifications for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 3: Medical Appropriateness Review

MEDICAL APPROPRIATENESS REVIEW SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
Which benefit classifications does the plan have services subject to this NQTL? (inpatient, outpatient, emergency care, prescription drugs)	IP and OP	IP and OP	IP and OP	IP and OP	IP and OP
What is the process for determining medical appropriateness for individuals OVER the age of 21?	Clinical Coordinators review the submitted clinical documentation and compare it to the appropriate medical necessity guidelines and the Colorado Medicaid medical necessity criteria to determine if the request is	Review of clinical information, records, and lab work submitted by the treating provider.	Clinical info is first reviewed by licensed behavioral health clinician for medical appropriateness per medical necessity criteria and InterQual; a physician is consulted as needed.	Follows established procedures for applying clinical criteria based on the individual member's needs and the local delivery system for medical and behavioral health services. Reviewers collect and review relevant clinical information to determine if the	Review submitted information for completeness, compliance and medical appropriateness utilizing specific HCPF inpatient policy, guidelines, and the appropriate criteria by the first and second level reviewers.[66]

[66] First Level Reviewers consist of Registered Nurses who may: Approve the service as requested based on MCG/InterQual or HCPF approved criteria, and compliance to policies and federal guidelines, Request additional information from the Provider to support the request. Refer the request to a physician reviewer-If the nurse reviewer believes that the request may not meet medical necessity, should be denied for medical necessity, or would like further input from a physician reviewer, they will refer it for further review and determination (2nd level Physician Review)., Deny the request for technical reasons, including failing to provide the necessary documentation, not submitting the request timely, and/or if the request is a duplicate, etc. First Level Reviewers cannot deny for lack of medical necessity. Second Level Reviewers consist of Physicians who may: Approve the service as requested based on MCG/InterQual or HCPF approved Criteria, and compliance to policies and federal guidelines, Request additional information from the Provider to support the request, Render either a full or partial denial for lack of medical necessity.

MEDICAL APPROPRIATENESS REVIEW **SCENARIO 3: RAE 1-7 AND HCPF FFS**					
QUESTION	**RAE 1 MH/SUD**	**RAE 2&4 MH/SUD**	**RAE 3&5 MH/SUD**	**RAE 6&7 MH/SUD**	**HCPF M/S**
	medically appropriate.			level-of-care /service requested meets medical necessity, considering the member circumstances.	
What is the process for determining medical appropriateness for individuals UNDER the age of 21?	Same as above. The process followed is the same regardless of the age of the individual.	Same as above. The process followed is the same regardless of the age of the individual.	Same as above. The process followed is the same regardless of the age of the individual.	Same as above. The process followed is the same regardless of the age of the individual.	Same as above, but also follows EPSDT guidance in any review for a member under 21. This process is built into every PAR review for a member 20 and under automatically.
Do you use a two-level review process?	Yes	Yes	Yes	Yes	Yes
Who performs the medical appropriateness reviews? Please include who can approve/deny and the qualifications of the reviewers.	Clinical Coordinators can approve authorizations but cannot deny authorizations for medical necessity. All Clinical Coordinators are licensed behavioral health clinicians (LPC, LMFT, LCSW) or RNs with psychiatric experience. All	Clinical care managers are licensed behavioral health staff can approve services, but can't deny care. Licensed, doctoral-level staff with appropriate education and experience related to the requested services. PhD or PsyD staff are	Licensed behavioral health clinicians may approve authorization requests. Board-certified psychiatrists are the only reviewers who may issue an adverse benefit determinations.	Behavioral Health Care Managers possess an active unrestricted license as an RN, LCSW, LMSW, LMHC, LPC, LBA (as allowed by applicable state laws), LMFT, or Clinical Psychologist, to practice as a health professional within the scope of licensure in	1st level: RN or other appropriately licensed personnel for certain benefits can pend, approve, technically deny, refer to 2nd level. 2nd level-physician/BCBA-D can deny for medical necessity or technical, can approve or pend.

MEDICAL APPROPRIATENESS REVIEW **SCENARIO 3: RAE 1-7 AND HCPF FFS**					
QUESTION	**RAE 1 MH/SUD**	**RAE 2&4 MH/SUD**	**RAE 3&5 MH/SUD**	**RAE 6&7 MH/SUD**	**HCPF M/S**
	Clinical Coordinators are licensed in Colorado. Medical directors can approve/deny authorizations. RAE Medical Directors are licensed physicians; hold an unrestricted license to practice in CO; board certified in psychiatry. One medical director is also board certified in addiction medicine.	permitted to deny/approve outpatient services, but not inpatient or residential services. MD or DO staff are permitted to deny/approve all levels of care.		applicable states or territory of the U.S. Medical Directors possess M.D. or D.O.; Board certification; active unrestricted medical license; minimum 5 years clinical experience in BH and UM. Medical Director can approve/deny requested services based on medical necessity.	

Medical Appropriateness Review

Findings: Scenario 3

The medical appropriateness review policies and procedures regarding classifications, processes for determination, two-level review, and reviewer qualifications for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 4: Medical Appropriateness Review

MEDICAL APPROPRIATENESS REVIEW SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
Which benefit classifications does the plan have services subject to this NQTL? (inpatient, outpatient, emergency care, prescription drugs)	IP, OP. See PAR policy.	IP, OP. Care at a DH facility does not requirement authorization. Care outside of DH requires medical necessity review and authorization.
What is the process for determining medical appropriateness for individuals OVER the age of 21?	When a request for authorization is received, the clinical information is first reviewed by a licensed behavioral health clinician, who reviews for medical appropriateness per medical necessity criteria and InterQual; a physician is consulted as needed.	Requests are reviewed based on medical necessity guidelines, eligibility and benefits. If medical necessity review guidelines are not met, then physician review is mandatory.
What is the process for determining medical appropriateness for individuals UNDER the age of 21?	When a request for authorization is received, the clinical information is first reviewed by a licensed behavioral health clinician, who reviews for medical appropriateness per medical necessity criteria and InterQual; a physician is consulted as needed. EPSDT requirements are followed when making determinations.	Requests are reviewed based on medical necessity guidelines, eligibility and benefits. If medical necessity review guidelines are not met, then physician review is mandatory. EPSDT requirements are followed when making determinations.
Do you use a two-level review process?	Yes. Approvals do not require a two-level review (physician consult is optional for approvals). Denials require a two-level review (physician must issue an adverse benefit determination).	Yes. Administrative denials (not a benefit, not a contracted provider) can be denied by licensed registered nurse which is the first level reviewer. Medical necessity denials require secondary level reviews by a physician reviewer.
Who performs the medical appropriateness reviews? Please include who can approve/deny and the qualifications of the reviewers.	Licensed behavioral health clinicians may approval authorization requests. Board-certified psychiatrists are the only reviewers who may issue an adverse benefit determinations.	Licensed registered nurse can review and approve all requests that meet criteria, they can also deny all administrative denials: not a benefit and no prior authorization. Any denial not meeting criteria must have

MEDICAL APPROPRIATENESS REVIEW SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
		second level physician reviewer. Physician reviewers are state licensed and Board certified.

Medical Appropriateness Review

Findings: Scenario 4

The medical appropriateness review policies and procedures regarding classifications, processes for determination, two-level review, and reviewer qualifications for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Appendix F – Fail First/Step Therapy Protocols

Description: Health plan policies and protocols that requires steps or failure on a less costly treatment before authorizing a more costly treatment.

Tools for Analysis: Data request, interviews with health plan staff, and policies/procedures documents referencing protocols used to determine fail first or step therapy protocols, including which services require these protocols.

Summary of Results: The following table illustrates the characteristics of each scenario including health plans being compared, applicable benefit categories, whether differences were found in the analysis, and compliance finding.

	Used by	Benefit Categories	Differences between M/S and MH/SUD	Compliance Determined
Scenario 1	HCPF	*N/A*	*N/A*	*N/A*
Scenario 2	RMHP and Prime MCO	PD	No	✓Yes
Scenario 3	RAE 1	*N/A*	*N/A*	*N/A*
	RAE 2 and 4	*N/A*	*N/A*	*N/A*
	RAE 3 and 5	*N/A*	*N/A*	*N/A*
	RAE 6 and 7	*N/A*	*N/A*	*N/A*
Scenario 4	Denver PIHP and Denver Health MCO	PD	Yes	✓Yes

Plans that do not utilize this NQTL are shown in italics in the above table.

Results by Scenario: On the following pages, each scenario is expanded into an overview of primary policies that impact this NQTL.

Scenario 2: Fail First / Step Therapy Protocols

FAIL FIRST / STEP THERAPY PROTOCOLS SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
Does the plan have any policies or processes that require steps or failure on a less costly treatment before authorizing a more costly treatment? If so, please list the benefit classifications of the services and detail the policies or procedures.	MH/SUD: No.[67] Pharmacy: Drugs that guideline supported to be 2nd/3rd/4th line therapies that have the potential to be prescribed as first line therapy may get restrictions that require prior use of certain drugs before approval. A drug that is indicated for first line use may also get a fail first strategy imposed on it if there are other options that are considered as safe and effective at a lower cost to ensure effective use of healthcare dollars. There is an exception process that will allow for the target drug to be used without first fail if the provider makes a case that alternatives would not be appropriate for the patient either tried and failed in a timeframe outside what the health plans records show or alternatives would be contraindicated.	M/S: No.[68] Pharmacy: Drugs that guideline supported to be 2nd/3rd/4th line therapies that have the potential to be prescribed as first line therapy may get restrictions that require prior use of certain drugs before approval. A drug that is indicated for first line use may also get a fail first strategy imposed on it if there are other options that are considered as safe and effective at a lower cost to ensure effective use of healthcare dollars. There is an exception process that will allow for the target drug to be used without first fail if the provider makes a case that alternatives would not be appropriate for the patient either tried and failed in a timeframe outside what the health plans records show or alternatives would be contraindicated.
Does the plan have any policies or processes that apply steps or failure on a less costly treatment to medication-assisted treatment?	MH/SUD: No. Pharmacy: No step therapy or fail first policies apply to MAT.	M/S: No. Pharmacy: No step therapy or fail first policies apply to MAT.

Fail First / Step Therapy Protocols

[67] RMHP does not have any specific policy or process regarding fail first or step therapy protocols for MH, SUD, or M/S services. However, for some services, MCG's guidelines do indicate that other services should be tried before a more invasive procedure is tried and it is something that is clinically considered when making UM decisions. This is unrelated to the cost of the treatments and is good clinical practice to consider. Instead, the consideration is given to ensure that members are placed in a level of care that meets their specific needs in the least intensive and restrictive way possible. It is also in line with the state's Medicaid medical necessity definition of providing the clinically appropriate treatment in the right place, time, frequency and type.

[68] Ibid.

Findings: Scenario 2

The fail first / step therapy policies and procedures regarding any requirements of steps or failure before authorization MH/SUD services are the same as the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 4: Fail First / Step Therapy Protocols

FAIL FIRST / STEP THERAPY PROTOCOLS **SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO**		
QUESTION	**MH/SUD**	**M/S**
Does the plan have any policies or processes that require steps or failure on a less costly treatment before authorizing a more costly treatment? If so, please list the benefit classifications of the services and detail the policies or procedures.	9 of 56 drugs on Step Therapy protocols are MH drugs. No SUD drugs are on Step Therapy protocols.	For the required J codes, IV and injectable medications if there is a lower cost alternate or approved formulary drug, the DHMC pharmacy must review clinical justification/documentation from the provider verifying a failed response to the lower cost medication before a higher level drug will be approved.
Does the plan have any policies or processes that apply steps or failure on a less costly treatment to medication-assisted treatment?	No	For the required J codes, IV and injectable medications if there is a lower cost alternate or approved formulary drug, the DHMC pharmacy must review clinical justification/documentation from the provider verifying a failed response to the lower cost medication before a higher level drug will be approved.

Fail First / Step Therapy Protocols

Findings: Scenario 4

Of the 56 drugs DHMC has on Step Therapy protocols, only 9 of those are MH drugs and none of them are SUD drugs. The fail first / step therapy policies and procedures regarding any requirements of steps or failure before authorization of MH/SUD services are less stringent than the policies and procedures applied to M/S services, and they follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Appendix G – Conditioning Benefits on Completion of a Course of Treatment

Description: Health plan benefits/services conditional on previous treatment completion.

Tools for Analysis: Data request, interviews with health plan staff, and policies/procedures documents referencing presence of utilization and quality management policies that condition benefits on treatment completion and policy applicability to MH/SUD and M/S benefits.

Summary of Results: The following table illustrates the characteristics of each scenario including health plans being compared, applicable benefit categories, whether differences were found in the analysis, and compliance finding.

	Used by	Benefit Categories	Differences between M/S and MH/SUD	Compliance Determined
Scenario 1	HCPF	*N/A*	*N/A*	*N/A*
Scenario 2	RMHP and Prime MCO	*N/A*	*N/A*	*N/A*
Scenario 3	RAE 1	*N/A*	*N/A*	*N/A*
	RAE 2 and 4	*N/A*	*N/A*	*N/A*
	RAE 3 and 5	*N/A*	*N/A*	*N/A*
	RAE 6 and 7	*N/A*	*N/A*	*N/A*
Scenario 4	Denver PIHP and Denver Health MCO	*N/A*	*N/A*	*N/A*

Plans that do not utilize this NQTL are shown in italics in the above table.

Analysis/Findings: No benefit category was shown to contain policies or procedures conditioning benefits on a completion of a course of treatment.

Appendix H – Outlier Management

Description: The health plan's utilization management policies and processes for determining when a participant's benefits requires additional clinical review and potentially service changes.

Tools for Analysis: Data request, interviews with health plan staff, and policies/procedures documents referencing outlier review and quality management policies and processes.

Summary of Results: The following table illustrates the characteristics of each scenario including health plans being compared, applicable benefit categories, whether differences were found in the analysis, and compliance finding.

	Used by	Benefit Categories	Differences between M/S and MH/SUD	Compliance Determined
Scenario 1	HCPF	IP, OP, EC, PD	No	✓Yes
Scenario 2	RMHP and Prime MCO	IP, OP, EC, PD	No	✓Yes
Scenario 3	RAE 1	IP, OP, EC	No	✓Yes
	RAE 2 and 4	IP, OP	No	✓Yes
	RAE 3 and 5	IP, OP	No	✓Yes
	RAE 6 and 7	IP, OP	No	✓Yes
Scenario 4	Denver PIHP and Denver Health MCO	IP, OP, EC, PD	No	✓Yes

Results by Scenario: On the following pages, each scenario is expanded into an overview of primary policies that impact this NQTL.

Scenario 1: Outlier Management

OUTLIER MANAGEMENT SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
How does the plan monitor over- and under-utilization of services?	HCPF's outlier management program for FFS behavioral health has multiple components. These include utilizing a recovery audits contractor (RAC) to review certain claims for the medical appropriateness and billed services. Additionally, the FFS UM Vendor will notify HCPF of any concerns regarding waste, fraud, abuse that are identified as a part of the normal review process. And finally, HCPF reviews claims for use in future policy setting.	HCPF's outlier management program for FFS physical health has multiple components. These include utilizing a recovery audits contractor (RAC) to review certain claims for the medical appropriateness and billed services. Additionally, the FFS UM Vendor will notify HCPF of any concerns regarding waste, fraud, abuse that are identified as a part of the normal review process. And finally, HCPF reviews claims for use in future policy setting.
Are all services subject to outlier monitoring? IF NO, list all services by benefit classification subject to monitoring.	Outliers are brought to the attention of HCPF by the UM Vendor across all benefits.	Outliers are brought to the attention of HCPF by the UM Vendor across all benefits.
Are there any exceptions to these policies for reviews of services for members under the age of 21?	EPSDT requirements are followed when making determinations.	EPSDT requirements are followed when making determinations.
What actions are taken based on information from outlier reports? (policy change, payment recovery, additional analysis, etc)	In reviewing outliers, there may be a necessary change in clinical criteria, or policy, additional analysis or referrals to Program Integrity.	In reviewing outliers, there may be a necessary change in clinical criteria, or policy, additional analysis or referrals to Program Integrity.

Outlier Management

Findings: Scenario 1

Outlier management is the health plan's utilization management policies and processes for determining when a participant's benefits requires additional clinical review and potentially service changes.

The outlier management policies and procedures regarding monitoring over- and under-utilization, monitored services, exceptions, and actions taken for MH/SUD services are the same as the policies and procedures for M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 2: Outlier Management

OUTLIER MANAGEMENT SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
How does the plan monitor over- and under-utilization of services?	RMHP monitors over and underutilization of services to ensure that Members receive necessary and appropriate care. Data are collected from multiple sources including HEDIS® results and Member surveys, appeals and grievance data, quality of care reports, utilization management reports and pharmacy utilization reports. Data are reviewed, trended, analyzed and interventions are developed and implemented based on outcomes of the analysis.[69]	RMHP monitors over and underutilization of services to ensure that Members receive necessary and appropriate care. Data are collected from multiple sources including HEDIS® results and Member surveys, appeals and grievance data, quality of care reports, utilization management reports and pharmacy utilization reports. Data are reviewed, trended, analyzed and interventions are developed and implemented based on outcomes of the analysis.[70]
Are all services subject to outlier monitoring? IF NO, list all services by benefit classification subject to monitoring.	MH/SUD: Yes	M/S: Yes
Are there any exceptions to these policies for reviews of services for members under the age of 21?	No	No
What actions are taken based on information from outlier reports? (policy change, payment recovery, additional analysis, etc)	Creation of new programs, change in processes, change in policies, payment recovery in the event of inappropriate billing, and further specific analysis to look at cause and effects. Pharmacy: Programs work with member and prescribers to bring outliers into more standard of care.	Creation of new programs, change in processes, change in policies, payment recovery in the event of inappropriate billing, and further specific analysis to look at cause and effects. Pharmacy: Programs work with member and prescribers to bring outliers into more standard of care.

Outlier Management

[69] Areas of focus include: MONITORING OF OVERUTILIZATION: Concurrent reviews, Pre-authorizations, High ER utilization for non-emergent conditions, Hospitalization for preventable conditions, Hospital readmission within 30 days of discharge, Pharmacy overutilization (Opioids), Colorado Overutilization Project (COUP)- Medicaid; MONITORING OF UNDERUTILIZATION: Members identified with Preventative Care and Screening Gaps, Gaps in Care Reporting (providers), Member Education and Incentives, Encourage annual Wellness Visit, Provider Attribution Reports, Pharmacy Underutilization/Medication Management Program, Disease Management Program(s)

[70] Ibid.

Findings: Scenario 2

The purpose of the health plan's outlier management is to ensure members have access to appropriate care and are receiving services they need while managing healthcare quality, efficiency, and cost.

For pharmacy, the goal of Drug Safety Program is to support prescribers who provide controlled medications to members by decreasing the risk of duplicate therapy and/or other prescribers of these higher risk medications. In addition, members enrolled received additional support with medical and social determinants of health issues. The goal of MAP is to increase adherence to chronic medications that have evidence of improving long term outcomes. The goal of MRP is to improve treatment for higher risk and complex members to improve long term outcomes. These programs aim to provide value for our members/prescribers and the community. These are not intended to limit services but rather for RMHP to facilitate improved communication between the member, prescriber, and pharmacy.

The outlier management policies and procedures regarding monitoring over- and under-utilization, monitored services, exceptions, and actions taken for MH/SUD services are substantially similar to the policies and procedures for M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 3: Outlier Management

OUTLIER MANAGEMENT SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
How does the plan monitor over- and under-utilization of services?	RMHP monitors over and underutilization of services to ensure that Members receive necessary and appropriate care. Data are collected from multiple sources including HEDIS® results and Member surveys, appeals and grievance data, quality of care reports, utilization management reports and pharmacy utilization reports. Data are reviewed, trended, analyzed and interventions are developed and implemented based	NHP/HCI monitors utilization trends and identifies outliers related to high service volume, high cost, unusual lengths of stay, and 7- and 30-day readmissions.	COA monitors for outliers with frequent utilization of IP/OP services. COA considers frequent utilization on a case-by-case basis when evaluating whether continued or additional services will (or is reasonably expected to) benefit the member in the treatment of their MH/SUD condition(s). Per the definition of medical necessity, this is only one of many factors to consider when medical necessity is being evaluated. COA may recommend a different course of treatment if the services being	CCHA is committed to assuring access to health care and services for all participating members. Over-utilization and under-utilization of services are monitored using reports (i.e. LOS, Readmissions, etc.) made available to Behavioral Health Management and Quality Management (QM)) Departments by the Performance Management Analysts/ Finance Analysts. CCHA participates in the Colorado Client Over-Utilization Program(COUP).	HCPF's outlier management program for physical health has multiple components. These include utilizing a recovery audits contractor (RAC) to review certain claims for the medical appropriateness and billed services. Additionally, the FFS UM Vendor will notify HCPF of any concerns regarding waste, fraud, abuse that are identified as a part of the normal review process. And finally, HCPF reviews claims for use in future policy setting.

OUTLIER MANAGEMENT SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
	on outcomes of the analysis.[71]		requested are not effective in treating the member's MH/SUD condition(s).		
Are all services subject to outlier monitoring? IF NO, list all services by benefit classification subject to monitoring.	Yes	Yes	Yes	Yes	Yes
Are there any exceptions to these policies for reviews of services for members under the age of 21?	No	No	No	No	EPSDT requirements are followed when making determinations.
What actions are taken based on information from outlier reports? (policy change, payment recovery, additional analysis, etc)	Many actions have been taken as a result of reviewing outlier reports including the creation of new programs, change in processes, change in policies, payment recovery	Additional information may be requested to authorize continuing services. For example, the provider may be asked to provide a treatment plan and/or attest that	Interventions/ follow up measures could including (but not limited to): patient education on appropriate service utilization via the COA care management program, provider	The results of the reviews are used to help implement strategies to achieve utilization targets consistent with clinical and quality indicators and	In reviewing outliers, there may be a necessary change in clinical criteria, or policy, additional analysis or referrals to Program Integrity.

[71] Areas of focus include: MONITORING OF OVERUTILIZATION: Concurrent reviews, Pre-authorizations, High ER utilization for non-emergent conditions, Hospitalization for preventable conditions, Hospital readmission within 30 days of discharge, Pharmacy overutilization (Opioids), Colorado Overutilization Project (COUP)- Medicaid, MONITORING OF UNDERUTILIZATION: Members identified with Preventative Care and Screening Gaps, Gaps in Care Reporting (providers), Member Education and Incentives, Encourage annual Wellness Visit, Provider Attribution Reports, Pharmacy Underutilization/Medication Management Program, Disease Management Program(s)

OUTLIER MANAGEMENT SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
	in the event of inappropriate billing, and further specific analysis to look at cause and effects.	they are following the RAE's clinical guidelines. Outlier reports or other data mining may also initiate focused audit processes and/or investigations related to fraud, waste, and abuse.	education on medical necessity, documentation requirements, and/or billing practices, referral to the COA compliance team for auditing and/or recoupment, referral to the COA Quality team for assessment and treatment plan reviews, and/or further analysis and record reviews.	identify fraud and abuse.	

Outlier Management

Findings: Scenario 3

The purpose of HCPF's FFS utilization management outlier management policies and processes is for determining when a participant's benefits requires additional clinical review and potentially service changes. RAE 1's goal of outlier management is to ensure members have access to appropriate care and are receiving services they need while managing healthcare quality, efficiency, and cost. RAEs 2 and 4 look to identify utilization trends over time and across facilities or providers. This information can be helpful in educating providers about medical necessity and the application of clinical best practices. Additionally, outlier review is used to identify over-utilization of services that are not medically necessary and to prevent unnecessary costs. RAEs 3 and 5 use these policies to ensure the member is receiving the appropriate and effective level of care for their clinical

presentation. RAEs 6 and 7 use the results of the reviews to help implement strategies to achieve utilization targets consistent with clinical and quality indicators and identify fraud and abuse.

The outlier management policies and procedures regarding monitoring over- and under- utilization, monitored services, exceptions, and actions taken for MH/SUD services are substantially similar to the policies and procedures for M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 4: Outlier Management

OUTLIER MANAGEMENT SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
How does the plan monitor over- and under-utilization of services?	COA monitors for outliers with frequent utilization of inpatient/outpatient services. COA considers frequent utilization on a case-by-case basis when evaluating whether continued or additional services will (or is reasonably expected to) benefit the member in the treatment of their behavioral health condition(s). Per the definition of medical necessity, this is only one of many factors to consider when medical necessity is being evaluated. COA may recommend a different course of treatment if the services being requested are not effective in treating the member's behavioral health condition(s).	The DHMC QI team tracks and monitors over and underutilization (e.g., emergency department readmission, etc.) and reports findings quarterly to the Medical Management Committee.
Are all services subject to outlier monitoring? IF NO, list all services by benefit classification subject to monitoring.	Yes	Yes
Are there any exceptions to these policies for reviews of services for members under the age of 21?	No	No
What actions are taken based on information from outlier reports? (policy change, payment recovery, additional analysis, etc)	If an outlier is identified, any number of interventions/follow up measures could occur, including (but not limited to): patient education on appropriate service utilization via the COA care management program, provider education on medical necessity, documentation requirements, and/or billing practices, referral to the	If an over/under utilizing member is identified the care management team is notified. The care management team will outreach directly to the member to provider education, resources, support and when appropriate advocate for the member to join an intervention program.

OUTLIER MANAGEMENT SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
	COA compliance team for auditing and/or recoupment, referral to the COA Quality team for assessment and treatment plan reviews, and/or further analysis and record reviews.	

Outlier Management

Findings: Scenario 4

The health plan's outlier management policies work to ensure the member is receiving the appropriate and effective level of care for their clinical presentation – that they receive the right care at the right time with the right provider. The purpose is not to limit the accessibility of services, but to identify over- or under-utilization on a case-by-case, member-specific basis to ensure the member is receiving clinically appropriate, clinically effective care for their needs.

The outlier management policies and procedures regarding monitoring over- and under-utilization, monitored services, exceptions, and actions taken for MH/SUD services are substantially similar to the policies and procedures for M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Appendix I – Coding Limitations

Description: The claims processing, coding, and billing standards set by health plans for utilization in their benefit/service selection and payment.

Tools for Analysis: Data request, interviews with health plan staff, and policies/procedures documents referencing the selection and application of industry standard codes for claims processing, coding, and billing (i.e., Uniform Service Coding Manual and/or National Correct Coding Initiative).

Summary of Results: The following table illustrates the characteristics of each scenario including health plans being compared, applicable benefit categories, whether differences were found in the analysis, and compliance finding.

	Used by	Benefit Categories	Differences between M/S and MH/SUD	Compliance Determined
Scenario 1	HCPF	IP, OP	No	✓Yes
Scenario 2	RMHP and Prime MCO	IP, OP	No	✓Yes
Scenario 3	RAE 1	IP, OP	No	✓Yes
	RAE 2 and 4	IP, OP	No	✓Yes
	RAE 3 and 5	IP, OP	No	✓Yes
	RAE 6 and 7	IP, OP	No	✓Yes
Scenario 4	Denver PIHP and Denver Health MCO	IP, OP	No	✓Yes

Results by Scenario: On the following pages, each scenario is expanded into an overview of primary policies that impact this NQTL.

Scenario 1: Coding Limitations

CODING LIMITATIONS SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
What coding set do you use for determining what services are eligible for reimbursement?	Coding limitations are used for IP and OP, in accordance with the CO Medicaid provider billing manual from HCPF for FFS MH/SUD and M/S services and guidance from CMS, such as Medically Unlikely Edits (MUE). Some services and supplies that require a PAR may have coding and unit limitations that can be found on the Colorado Fee Schedule and billing manuals. The EPSDT benefit provides comprehensive and preventive health care services for members 20 years of age and younger who are enrolled with Colorado's Medicaid Program. For OP services Providers still need to ensure that they are meeting all other requirements for the benefit and PAR process. Providers may submit a request for code for a service or supply that is not a covered benefit, or exceeds limitations of the benefit, of Colorado Medicaid as part of the EPSDT exception process, which will then undergo a review for compliance and medical necessity by the UM Vendor. Service and/or unit limitations found on the Fee Schedule may not be applicable under EPSDT. FFS benefits are defined according to the Colorado Medicaid State Plan. The Colorado Medicaid program uses the CMS HCPCS to identify services provided to Colorado Medicaid members. The HCPCS includes codes identified in the	Coding limitations are used for IP and OP, in accordance with the CO Medicaid provider billing manual from HCPF for FFS MH/SUD and M/S services and guidance from CMS, such as Medically Unlikely Edits (MUE). Some services and supplies that require a PAR may have coding and unit limitations that can be found on the Colorado Fee Schedule and billing manuals. The EPSDT benefit provides comprehensive and preventive health care services for members 20 years of age and younger who are enrolled with Colorado's Medicaid Program. For OP services Providers still need to ensure that they are meeting all other requirements for the benefit and PAR process. Providers may submit a request for code for a service or supply that is not a covered benefit, or exceeds limitations of the benefit, of Colorado Medicaid as part of the EPSDT exception process, which will then undergo a review for compliance and medical necessity by the UM Vendor. Service and/or unit limitations found on the Fee Schedule may not be applicable under EPSDT. FFS benefits are defined according to the Colorado Medicaid State Plan. The Colorado Medicaid program uses the CMS HCPCS to identify services provided to Colorado Medicaid members. The HCPCS includes codes identified in the

CODING LIMITATIONS SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
	Physician's Current Procedural Terminology (CPT) and codes developed by CMS. Updates and revisions to HCPCS listings are documented in the Provider Bulletins. Uniform Service Coding Standards Manual is also used for MH/SUD.	Physician's Current Procedural Terminology (CPT) and codes developed by CMS. Updates and revisions to HCPCS listings are documented in the Provider Bulletins.

Coding Limitations

Findings: Scenario 1

The coding sets used by the health plans establish what services are eligible for reimbursement. The sets utilized for MH/SUD services are substantially similar to those used for M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 2: Coding Limitations

CODING LIMITATIONS SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
What coding set do you use for determining what services are eligible for reimbursement?	RAE/Prime Contract with HCPF, Covered Services HFC Fee Schedule Uniform Service Coding Standards Manual CPT/ICD-10 Standard Code Sets	RAE/Prime Contract with HCPF, Covered Services HFC Fee Schedule Uniform Service Coding Standards Manual CPT/ICD-10 Standard Code Sets

Coding Limitations

Findings: Scenario 2

The coding sets used by the health plans establish what services are eligible for reimbursement. The sets utilized for MH/SUD services are the same to those used for M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 3: Coding Limitations

CODING LIMITATIONS SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
What coding set do you use for determining what services are eligible for reimbursement?	RAE/Prime Contract with HCPF, Exhibit I Uniform Service Coding Standards Manual CPT/ICD-10 Standard Code Sets	RAE Contract with HCPF Uniform Service Coding Standards Manual CPT/ICD-10 Standard Code Sets	RAE Contract with HCPF Uniform Service Coding Standards Manual CPT/ICD-10 Standard Code Sets	RAE Contract with HCPF Uniform Service Coding Standards Manual CPT/ICD-10 Standard Code Sets	Coding limitations are used for IP and OP, in accordance with the Colorado Medicaid provider billing manual from HCPF for FFS MH/SUD and M/S services and guidance from CMS, such as Medically Unlikely Edits (MUE). Providers may submit a request for code for a service or supply that is not a covered benefit, or exceeds limitations of the benefit, of Colorado Medicaid as part of the EPSDT exception process, which will then undergo a review for compliance and medical necessity by the UM Vendor. Service and/or unit limitations found on the Fee Schedule may not be

CODING LIMITATIONS SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
					applicable under EPSDT. Fee-for-Service benefits are defined according to the Colorado Medicaid State Plan. The Colorado Medicaid program uses the CMS HCPCS to identify services provided to Colorado Medicaid members. The HCPCS includes codes identified in the CPT and codes developed by CMS.

Coding Limitations

Findings: Scenario 3

The coding sets used by the health plans establish what services are eligible for reimbursement. The sets utilized for MH/SUD services are substantially similar to those used for M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 4: Coding Limitations

CODING LIMITATIONS SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
What coding set do you use for determining what services are eligible for reimbursement?	Contract with HCPF and the Uniform Service Coding Standards Manual Includes CPT, HCPC, and revenue codes outlined contract. CPT/ICD-10 Standard Code Sets	Contract with HCPF and the Uniform Service Coding Standards Manual

Coding Limitations

Findings: Scenario 4

The coding sets used by the health plans establish what services are eligible for reimbursement. The sets utilized for MH/SUD services are substantially similar to those used for M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Appendix J - Network Provider Admission

Description: Network provider admission is the process of recruitment, credentialing, and accepting treatment providers into a health plan's network of care professionals.

Tools for Analysis: Data request, interviews with health plan staff, and policies/procedures documents referencing provider network selection criteria for network admission, credentialing, and recredentialing of MH/SUD and M/S providers, provider appeals process, utilization of national accrediting standards.

Summary of Results: The following table illustrates the characteristics of each scenario including health plans being compared, applicable benefit categories, whether differences were found in the analysis, and compliance finding.

	Used by	Benefit Categories	Differences between M/S and MH/SUD	Compliance Determined
Scenario 1	HCPF	IP, OP, EC, PD	No	✓Yes
Scenario 2	RMHP and Prime MCO	IP, OP, EC, PD	No	✓Yes
Scenario 3	RAE 1	IP, OP, EC	No	✓Yes
	RAE 2 and 4	IP, OP, EC	No	✓Yes
	RAE 3 and 5	IP, OP, EC	No	✓Yes
	RAE 6 and 7	IP, OP, EC	No	✓Yes
Scenario 4	Denver PIHP and Denver Health MCO	IP, OP, EC, PD	No	✓Yes

Results by Scenario: On the following pages, each scenario is expanded into an overview of primary policies that impact this NQTL.

Scenario 1: Network Provider Admission

NETWORK PROVIDER ADMISSION SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
What process is followed for recruiting and accepting providers into the plan's network of care professionals?	HCPF is responsible for enrolling Providers, and the UM Vendor receives the enrollment feeds, and so as long as the provider is enrolled and the appropriate provider type for the benefit they may request a PAR. HCPF will accept any willing provider that meets the enrollment requirements, but will specifically recruit by need. Typically will use the provider bulletin to announce specific needs.	HCPF is responsible for enrolling Providers, and the UM Vendor receives the enrollment feeds, and so as long as the provider is enrolled and the appropriate provider type for the benefit they may request a PAR. HCPF will accept any willing provider that meets the enrollment requirements, but will specifically recruit by need. Typically will use the provider bulletin to announce specific needs.
What national accrediting standards are used to determine admission into the plan's network of care professionals?	Providers wishing to enroll with Medicaid must the specific requirements of provider type and services to be provided.	Providers wishing to enroll with Medicaid must the specific requirements of provider type and services to be provided.
What process does a provider follow to become credentialed and recredentialed with the plan?	The FFS Medicaid provider enrollment process uses a validation process based on federal requirements (i.e. practitioner must be licensed to enroll, etc.) for all providers.	The FFS Medicaid provider enrollment process uses a validation process based on federal requirements (i.e. practitioner must be licensed to enroll, etc.) for all providers.
How often do providers need to revalidate/recredential?	Providers must revalidate at least every 5 years.	Providers must revalidate at least every 5 years.
How often do providers need to recontract?	Providers do not contract with HCPF. Providers enroll with Medicaid and that enrollment does not have a timeframe.	Providers do not contract with HCPF. Providers enroll with Medicaid and that enrollment does not have a timeframe.
What process does the plan have in place for a provider to appeal a denial into the plan's network?	If a provider is denied enrolling with Medicaid, they are provided an opportunity to submit updated documentation if they believe it will change the outcome.	If a provider is denied enrolling with Medicaid, they are provided an opportunity to submit updated documentation if they believe it will change the outcome.
Does the plan accept any willing provider into its network of care providers (assuming the provider is Medicaid enrolled, meets credentialing and quality standards, and accepts reasonable reimbursement for services)?	Yes. The FFS health plan does not limit provider participation beyond basic enrollment requirements (i.e. practitioner must be licensed to enroll, etc.) There is not a cap on the number of providers allowed to enroll and provide services.	Yes. The FFS health plan does not limit provider participation beyond basic enrollment requirements (i.e. practitioner must be licensed to enroll, etc.) There is not a cap on the number of providers allowed to enroll and provide services.

Network Provider Admission

Findings: Scenario 1

The network provider admission policies and procedures include recruitment, accrediting standards, credentialing/recredentialing, contracting timeframes, appealing a denial, and accepting any willing provider into the network. These policies and procedures for MH/SUD services are the same as the policies and procedures of M/S services, and follow standard industry practice. Other than the different licensure, the process is the same for MH/SUD and M/S.

It is determined that these policies and procedures are parity compliant.

Scenario 2: Network Provider Admission

NETWORK PROVIDER ADMISSION

SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO

QUESTION	MH/SUD	M/S
What process is followed for recruiting and accepting providers into the plan's network of care professionals?	RMHP accepts any willing provider who meets our credentialing standards and is willing to accept and negotiate reasonable reimbursement for services.	RMHP accepts any willing provider who meets our credentialing standards and is willing to accept and negotiate reasonable reimbursement for services.
What national accrediting standards are used to determine admission into the plan's network of care professionals?	NCQA	NCQA
What process does a provider follow to become credentialed and recredentialed with the plan?	Submit complete credentialing packet to RMHP for review. The packet must include a W9, current practice demographics, proof of enrollment with HCPF, and email address. Providers must have a current CAQH application. Providers are recredentialed every 36 months. Re-credentialing focus on verifying that CAQH and attestation is up-to-date and verifying licensure. If up to date, process is more streamlined.	Submit complete credentialing packet to RMHP for review. The packet must include a W9, current practice demographics, proof of enrollment with HCPF, and email address. Providers must have a current CAQH application. Providers are recredentialed every 36 months. Re-credentialing focus on verifying that CAQH and attestation is up-to-date and verifying licensure. If up to date, process is more streamlined.
How often do providers need to revalidate/recredential?	Every 36 months.	Every 36 months.

NETWORK PROVIDER ADMISSION SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
How often do providers need to recontract?	Most Provider contracts are evergreen, so they are in effect unless either party decides to terminate.	Most Provider contracts are evergreen, so they are in effect unless either party decides to terminate.
What process does the plan have in place for a provider to appeal a denial into the plan's network?	If a provider was denied due to credentialing reasons, they can appeal to a Medical Director. The MPRC has oversight of credentialing including the regulatorily required appeal process.	If a provider was denied due to credentialing reasons, they can appeal to a Medical Director. The MPRC has oversight of credentialing including the regulatorily required appeal process.
Does the plan accept any willing provider into its network of care providers (assuming the provider is Medicaid enrolled, meets credentialing and quality standards, and accepts reasonable reimbursement for services)?	Yes	Yes

Network Provider Admission

Findings: Scenario 2

The network provider admission policies and procedures include recruitment, accrediting standards, credentialing/recredentialing, contracting timeframes, appealing a denial, and accepting any willing provider into the network. These policies and procedures for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice. Other than the different licensure, the process is the same for MH/SUD and M/S.

It is determined that these policies and procedures are parity compliant.

Scenario 3: Network Provider Admission

NETWORK PROVIDER ADMISSION SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
What process is followed for recruiting and accepting providers into the plan's network of care professionals?	RMHP accepts any willing provider who meets our credentialing standards and is willing to accept and negotiate reasonable reimbursement for services.	The RAE engages specialty provider groups and facilities based on the [72]	The provider recruitment process is a collaborative effort between the Contracting team, Provider Network Services, and clinical program staff: verify provider meets quality standards and conditions for contracting. Provider Network Services contacts provider to schedule a meeting to discuss the contracting process and	CCHA admits providers and facilities that meet HCPF's requirements to enroll as a Medicaid provider and are able to meet CCHA's credentialing requirements.	HCPF is responsible for enrolling Providers, and the UM Vendor receives the enrollment feeds, and so as long as the provider is enrolled and the appropriate provider type for the benefit they may request a PAR. HCPF will accept any willing provider that meets the enrollment requirements, but will specifically recruit by need. Typically will use the provider

[72] Example specialty provider groups and facilities include providers who have: A unique specialty or clinical expertise; License to prescribe in all areas: APRN/APN, NP, PA, MD/DO (Board Certified Child and Adult Psychiatrists);Capability to treat in a foreign language, ASL, and/or, have specific cultural experience; Capability of billing both Medicare and Medicaid; Practice located in regional organization's service areas considered rural or frontier where there are fewer providers; Telemedicine, especially for prescriber services; Alignment with primary care and co-located in an integrated model; Capability to serve unique populations and disorders; Specialties such as Intellectual Disabilities, Autism, Members with Traumatic Brain Injuries or other groups that provide behavioral health services in addition to their non-covered specialty. Also, providers with experience in specialty care, long-term services and supports (LTSS) providers, managed service organizations and their networks of substance use disorder providers, dental and other ancillary providers; or Behavioral health providers that span inpatient, outpatient, and all other covered mental health and substance use disorder services.

NETWORK PROVIDER ADMISSION SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
			operational requirements of contracted network providers. Assistance in completing required documents is provided, if needed. For some providers, a clinical site visit may also be warranted.[73]		bulletin to announce specific needs.
What national accrediting standards are used to determine admission into the plan's network of care professionals?	National Committee for Quality Assurance (NCQA)	Council for Affordable Quality Healthcare (CAQH). Optionally a provider can complete a NHP/HCI application which is NCQA accredited and follows NCQA standards for credentialing.	National Committee for Quality Assurance (NCQA)	Council for Affordable Quality Healthcare (CAQH)	Providers wishing to enroll with Medicaid must the specific requirements of provider type and services to be provided.
What process does a provider follow to become credentialed and	Submit complete credentialing packet for review.	Submission of completed and signed applications,	Provider completes paper application or	CAQH Universal Provider Data Source is used. Providers	The Fee-For-Service Medicaid provider enrollment process

[73] Provider recruitment can be initiated as follows: Identified need through provider network adequacy assessment; Internal request from Care Management, Utilization Management, other; External request/referral from providers, members, other

NETWORK PROVIDER ADMISSION SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
recredentialed with the plan?	Packet includes W9, practice demographics, proof of enrollment with HCPF, and email address. Providers must have a current CAQH application. Providers are recredentialed every 36 months. Re-credentialing focus on verifying that CAQH and attestation is up-to-date and verifying licensure. If up to date, process is more streamlined.	along with all required supporting documentation using CAQH process or NHP/HCI process. The provider is notified about recredentialing up to 6 months ahead of time and if the provider's documents are current with CAQH, then the process is very streamlined.	electronic app through CAQH. To recredential, provider must update (or keep up to date in CAQH) their documentation. If up to date, we are able to recredential practitioners without ever having to notify them.	must complete the online credentialing application, authorize access to their information, verify and attest their data is accurate and complete, submit supporting documents.[74] Recredentialing is less administratively burdensome than the initial credentialing process – primarily just ensuring the CAQH information is up to date.	uses a validation process based on federal requirements (i.e. practitioner must be licensed to enroll, etc.) for all providers.

[74] CAQH Universal Provider Data Source credentialing process supporting documents: State license(s) applicable to your provider type, Board certification or highest level of medical training or education, Work history, Admitting privileges at a hospital accredited by the Joint Commission on Accreditation of Healthcare Organizations (JCAHO), National Integrated Accreditation for Healthcare Organizations (NIAHO), American Osteopathic Association (AOA) or a network hospital previously approved by the committee, Current DEA certificate or plan to prescribe if no DEA certificate, if applicable, Current Controlled and Dangerous Substances certificate, if applicable, Copy of the professional liability insurance face sheet is required. Organizational providers are required to maintain professional liability insurance in the amounts specified in the Network Provider Agreement consistent with State law requirements and CCHA policy. Summary of all pending or settled malpractice case(s) within the past 10 years, Curriculum vitae, Current signed attestation, Written protocol (advanced nurse practitioners only), Supervision form (physician assistants only), Hospital Coverage letter, required by CCHA from providers who do not have admitting privileges at a participating network hospital, State or federal license sanctions or limitations, Medicare, Medicaid or Federal Employees Health Benefits Program (FEHBP) sanctions, Disclosure of Ownership

NETWORK PROVIDER ADMISSION SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
How often do providers need to revalidate/recredential?	Providers must revalidate with Health First Colorado every 5 years. Providers must recredential every 36 months.	Providers must revalidate with Health First Colorado every 5 years. Providers must recredential every 36 months.	Providers must revalidate with Health First Colorado every 5 years. Providers must recredential every 36 months.	Providers must revalidate with Health First Colorado every 5 years. Providers must recredential every 36 months.	Providers must revalidate with Health First Colorado at least every 5 years.
How often do providers need to recontract?	Most Provider contracts are evergreen, so they are in effect unless either party decides to terminate.	Contracts with providers are evergreen, automatically renewing each year. Providers are not required to recontract as long as they meet credentialing and recredentialing requirements.	Most provider contracts auto-renew annually unless they are renegotiated or terminated.	CCHA Contracts are Evergreen. CCHA does not require providers to recontract once an agreement is dually executed.	Providers do not contract with HCPF. Providers enroll with Medicaid and that enrollment does not have a timeframe.
What process does the plan have in place for a provider to appeal a denial into the plan's network?	If a provider was denied due to credentialing reasons, they can appeal to a Medical Director. The MPRC has oversight of credentialing including the regulatorily required appeal process.	A provider is able to submit appeal to National Credentialing Committee within thirty (30) days of notification.	If the COA Credentialing Committee denies a new provider from joining our network, there is no appeals process. If the Credentialing Committee recommends that a provider is terminated from our network, then the	If an initial application is rejected the Practitioner has the opportunity for an Informal Review/ Reconsideration of the decision and the right to submit additional information to the Company to correct any errors in the	If a provider is denied enrolling with Medicaid, they are provided an opportunity to submit updated documentation if they believe it will change the outcome.

NETWORK PROVIDER ADMISSION SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
			provider is offered an appeal process to include a hearing.	factual information which led to the determination or provide other relevant information. This information must be submitted within the 30 calendar day period immediately following the date of receipt of the letter.	
Does the plan accept any willing provider into its network of care providers (assuming the provider is Medicaid enrolled, meets credentialing and quality standards, and accepts reasonable reimbursement for services)?	Yes	Yes	Yes	Yes	Yes

Network Provider Admission

Findings: Scenario 3

The network provider admission policies and procedures include recruitment, accrediting standards, credentialing/recredentialing, contracting timeframes, appealing a denial, and accepting any willing provider into the network. These policies and procedures for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice. Other than the different licensure, the process is the same for MH/SUD and M/S.

It is determined that these policies and procedures are parity compliant.

Scenario 4: Network Provider Admission

NETWORK PROVIDER ADMISSION SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
What process is followed for recruiting and accepting providers into the plan's network of care professionals?	Actively recruit providers based on need identified through care management, utilization management, requests from providers and members. Contact the providers to discuss contracting process and requirements, assist in completing application and credentialing process.	Identify potential gaps or network concerns through network adequacy reporting, utilization team requests, care management programs, grievance and appeals, CAPHS, etc., then outreach to providers.
What national accrediting standards are used to determine admission into the plan's network of care professionals?	NCQA	NCQA
What process does a provider follow to become credentialed and recredentialed with the plan?	Provider completes paper application or electronic app through CAQH. To recredential, provider must update (or keep up to date in CAQH) their documentation. If up to date, we are able to recredential practitioners without ever having to notify them.	Complete Application provided on the CAQH website so that the Credentialing Department may obtain and validate information attested to by the practitioner. The CAQH Credentialing Application must be currently signed or attested with the most recent information. Providers recredential at least every 36 months. DHMC notifies applicant of recredential process in a timely manner to meet 36-month timeframe.
How often do providers need to revalidate/recredential?	Revalidation with Health First CO: Every 5 years Recredentialing for COA: Every 3 years.	Revalidation with Health First CO: Every 5 years Recredentialing for DHMC: Every 3 years.
How often do providers need to recontract?	Most provider contracts auto-renew annually unless they are renegotiated or terminated.	Re-contracting is not required unless either party expresses a need to renegotiate.
What process does the plan have in place for a provider to appeal a denial into the plan's network?	If the COA Credentialing Committee denies a new provider from joining our network, there is no appeals process. If the Credentialing	Practitioners may appeal a credentialing or recredentialing decision using the practitioner appeal process

NETWORK PROVIDER ADMISSION SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
	Committee recommends that a provider is terminated from our network, then the provider is offered an appeal process to include a hearing.	as defined in the DHMC Provider Manual
Does the plan accept any willing provider into its network of care providers (assuming the provider is Medicaid enrolled, meets credentialing and quality standards, and accepts reasonable reimbursement for services)?	Yes	DHMC encourages providers to apply to join the network; however, as a closed network DHMC does not contract with all providers and focuses on areas of identified need.

Network Provider Admission

Findings: Scenario 4

The network provider admission policies and procedures include recruitment, accrediting standards, credentialing/recredentialing, contracting timeframes, appealing a denial, and accepting any willing provider into the network. These policies and procedures for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice. Other than the different licensure, the process is the same for MH/SUD and M/S.

It is determined that these policies and procedures are parity compliant.

Appendix K - Establishing Charges/Reimbursement Rates

Description: The process by which a health plan establishes charges/reimbursement rates of payment for participant services rendered by providers.

Tools for Analysis: Data request, interviews with health plan staff, and policies/procedures documents referencing charge establishment standards to ensure timely access to care and sufficient network adequacy; alignment of charges based on provider type and specialty.

Summary of Results: The following table illustrates the characteristics of each scenario including health plans being compared, applicable benefit categories, whether differences were found in the analysis, and compliance finding.

	Used by	Benefit Categories	Differences between M/S and MH/SUD	Compliance Determined
Scenario 1	HCPF	IP, OP, EC, PD	No	✓Yes
Scenario 2	RMHP and Prime MCO	IP, OP, EC, PD	No	✓Yes
Scenario 3	RAE 1	IP, OP, EC	Yes	✓Yes
	RAE 2 and 4	IP, OP, EC	Yes	✓Yes
	RAE 3 and 5	IP, OP, EC	Yes	✓Yes
	RAE 6 and 7	IP, OP, EC	Yes	✓Yes
Scenario 4	Denver PIHP and Denver Health MCO	IP, OP, EC, PD	Yes	✓Yes

Results by Scenario: On the following pages, each scenario is expanded into an overview of primary policies that impact this NQTL.

Scenario 1: Establishing Charges/Reimbursement Rates

ESTABLISHING CHARGES/REIMBURSEMENT RATES **SCENARIO 1: HCPF FFS**		
QUESTION	**MH/SUD**	**M/S**
What process is used to establish charges and reimbursement rates of payments for participant services rendered by providers? Please separate by benefit classifications as appropriate (inpatient, outpatient, emergency care, prescription drugs).	For Inpatient MH/SUD, HCPF uses its standard cost-based rate methodology that factors in indirect and direct care requirements, facility expense expectations, administrative expense expectations and capital overhead expense expectations. For Outpatient MH/SUD, HCPF uses its standard cost-based rate methodology that factors in indirect and direct care requirements, facility expense expectations, administrative expense expectations, and capital overhead expense expectations. For Emergency MH/SUD, HCPF uses the All Payer Refined Diagnosis Related Group (APR-DRG) payment methodology for provider reimbursement. This model incentivizes using the lowest level of care necessary for a service. The model is weighted. Each hospital has a base rate calculated from their Medicare base rates. The average cost of service at a hospital is multiplied by other factors. For MH/SUD prescribed pharmaceuticals, HCPF bases the payment on an average acquisition cost with a multiplier. If the average acquisition cost is unavailable, HCPF uses the average wholesale cost with a multiplier. For MH/SUD physician administered pharmaceuticals, the rate is based off Medicare data. Fees are updated quarterly. If data is not available, HCPF uses the Medicare Average Sales Price (ASP) minus 4.5%.	For Inpatient M/S, HCPF uses the All Payer Refined Diagnosis Related Group (APR-DRG) payment methodology for provider reimbursement. This model incentivizes using the lowest level of care necessary for a service. The model is weighted. Each hospital has a base rate calculated from their Medicare base rates. The average cost of service at a hospital is multiplied by other factors. For Outpatient M/S services, HCPF uses its standard cost-based rate methodology that factors in indirect and direct care requirements, facility expense expectations, administrative expense expectations, and capital overhead expense expectations. For Emergency M/S services, HCPF uses the All Payer Refined Diagnosis Related Group (APR-DRG) payment methodology for provider reimbursement. This model incentivizes using the lowest level of care necessary for a service. The model is weighted. Each hospital has a base rate calculated from their Medicare base rates. The average cost of service at a hospital is multiplied by other factors. For M/S prescribed pharmaceuticals, HCPF bases the payment on an average acquisition cost with a multiplier. If the average acquisition cost is unavailable, HCPF uses the average wholesale cost with a multiplier.

ESTABLISHING CHARGES/REIMBURSEMENT RATES SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
		For M/S physician administered pharmaceuticals, the rate is based off Medicare data. Fees are updated quarterly. If data is not available, HCPF uses the Medicare Average Sales Price (ASP) minus 4.5%.
Are there any differences that may exist based on provider type or specialty and separate by benefit classifications as appropriate (inpatient, outpatient, emergency care, prescription drugs).	If it's within the scope of their practice, a provider would get the same rate regardless of provider type or specialty.	If it's within the scope of their practice, a provider would get the same rate regardless of provider type or specialty.
How often is the current provider fee scheduled reviewed ?	At least annually. Labs are updated quarterly.	At least annually. Labs are updated quarterly.
How are providers notified of changes to reimbursement rates?	Any changes are communicated to providers including direct emails, provider bulletin, the ColoradoPAR program website and direct communication with providers.	Any changes are communicated to providers including direct emails, provider bulletin, the ColoradoPAR program website and direct communication with providers.
Is there a process for providers to negotiate reimbursement rates?	Currently, there is not a process for providers to negotiate reimbursement rates. However, provider and stakeholder outreach is performed when rates are being reviewed for sufficiency in order to gather additional reimbursement information that may be lacking in the rate methodology. Single case agreements are used for very limited situations where out of state hospital services are needed for services that the state doesn't have the ability to provide.	Currently, there is not a process for providers to negotiate reimbursement rates. However, provider and stakeholder outreach is performed when rates are being reviewed for sufficiency in order to gather additional reimbursement information that may be lacking in the rate methodology. Single case agreements are used for very limited situations where out of state hospital services are needed for services that the state doesn't have the ability to provide.

Establishing Charges/Reimbursement Rates

Findings: Scenario 1

The policies and procedures regarding establishing charges / reimbursement rates include process used, differences based on provider type or specialty, timeframes for reviewing fees, notifying providers, and negotiating rates. The policies and procedures for establishing charges and reimbursement rates for MH/SUD services are identical in every benefit category

except inpatient services. For inpatient services, while different, the MH/SUD policies and procedures are substantially similar to the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 2: Establishing Charges/Reimbursement Rates

ESTABLISHING CHARGES/REIMBURSEMENT RATES

SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO

QUESTION	MH/SUD	M/S
What process is used to establish charges and reimbursement rates of payments for participant services rendered by providers? Please separate by benefit classifications as appropriate (inpatient, outpatient, emergency care, prescription drugs).	Pharmacy: RMHP uses lesser of three logic to determine the price. Members are charged the lesser of AWP/MAC price, copay, or usual and customary (U/C) price. Copays are based on the tier structure of the benefit while the price reimbursed to the pharmacy is negotiated by the PBM, OptumRx. Reimbursement rates are based on brand and generic designation from MediSpan. Brand drugs negotiated at AWP minus % for any branded drug. Generics are set at a MAC price without regard for BH or medical indications IP/OP/EC: RMHP may determine reimbursement rates on the basis of State funding levels and/or fee schedules. Scarce services may receive special consideration for higher rates. This is true for all services.	Pharmacy: RMHP uses lesser of three logic to determine the price. Members are charged the lesser of AWP/MAC price, copay, or usual and customary (U/C) price. Copays are based on the tier structure of the benefit while the price reimbursed to the pharmacy is negotiated by the PBM, OptumRx. Reimbursement rates are based on brand and generic designation from MediSpan. Brand drugs negotiated at AWP minus % for any branded drug. Generics are set at a MAC price without regard for BH or medical indications IP/OP/EC: RMHP may determine reimbursement rates on the basis of State funding levels and/or fee schedules. Scarce services may receive special consideration for higher rates. This is true for all services.
Are there any differences that may exist based on provider type or specialty and separate by benefit classifications as appropriate (inpatient, outpatient, emergency care, prescription drugs).	Pharmacy: No IP/OP/EC: RMHP has different reimbursement levels based upon level of licensure. Scarce services may receive special consideration if needed to fill a network need.	Pharmacy: No IP/OP/EC: RMHP has different reimbursement levels based upon level of licensure. Scarce services may receive special consideration if needed to fill a network need.
How often is the current provider fee scheduled reviewed ?	Pharmacy: Ad Hoc IP/OP/EC: Annually	Pharmacy: Ad Hoc IP/OP/EC: Annually
How are providers notified of changes to reimbursement rates?	Contract amendment	Contract amendment
Is there a process for providers to negotiate reimbursement rates?	Pharmacy: No	Pharmacy: No

ESTABLISHING CHARGES/REIMBURSEMENT RATES **SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO**		
QUESTION	**MH/SUD**	**M/S**
	IP/OP/EC: Providers can submit rates for RMHP review and consideration.	IP/OP/EC: Providers can submit rates for RMHP review and consideration.

Establishing Charges/Reimbursement Rates

Findings: Scenario 2

The policies and procedures regarding establishing charges / reimbursement rates include process used, differences based on provider type or specialty, timeframes for reviewing fees, notifying providers, and negotiating rates. These policies and procedures for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 3: Establishing Charges/Reimbursement Rates

ESTABLISHING CHARGES/REIMBURSEMENT RATES SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
What process is used to establish charges and reimbursement rates of payments for participant services rendered by providers? Please separate by benefit classifications as appropriate (inpatient, outpatient, emergency care, prescription drugs).	IP/OP/EC - RMHP may determine reimbursement rates on the basis of State funding levels and/or fee schedules. Scarce services may receive special consideration for higher rates.	IP/OP/EC – NHP/HCI creates and maintains a fee schedule with Medicaid appropriate rates, uses available tools to determine usual and customary rates including, but not limited to, Colorado Fee For Services Medicaid Rates and standards, CMS Reimbursement Rates, or market standards.	IP/OP/EC - COA utilizes established reimbursement methods such as: DRG for inpatient; RBRVS, EAPG, and Colorado Medicaid fee schedule for outpatient. In addition, provider contracts may also include value based arrangements that provide incentives for meeting quality of care KPI's.	IP/OP/EC - Factors used to determine provider reimbursement rates: (a) provider location – urban vs. rural; (b) provider setting – office or facility; (c) competitiveness of our rates; (d) CPT/HCPCS code being billed; (e) Medicare reimbursement and tables illustrating office expenses; (f) education level of provider; (g) frequency with which a provider type specific codes; (h) for new CPT/HCPCS codes, evaluation of whether it is a replacement of a prior code, which we would crosswalk to the prior reimbursement amount, or a new	IP/EC - HCPF uses the All Payer Refined Diagnosis Related Group (APR-DRG) payment methodology for provider reimbursement. This model incentivizes using the lowest level of care necessary for a service. The model is weighted. Each hospital has a base rate calculated from their Medicare base rates. The average cost of service at a hospital is multiplied by other factors. OP - HCPF uses its standard cost-based rate methodology that factors in indirect and direct care requirements, facility expense expectations, administrative expense expectations, and

ESTABLISHING CHARGES/REIMBURSEMENT RATES SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
				code, where fees will be set based on relativity to surrounding codes; (i) Health First Colorado fee schedule; and (j) any legislative actions or requirements to our payment model. Emergency-CCHA will cover and pay for Emergency Services and Care, regardless of whether the entity furnishing the services is a participating provider. Prescription Drugs-N/A	capital overhead expense expectations. M/S prescribed pharmaceuticals -HCPF bases the payment on an average acquisition cost with a multiplier. If the average acquisition cost is unavailable, HCPF uses the average wholesale cost with a multiplier. M/S physician administered pharmaceuticals - The rate is based off Medicare data. Fees are updated quarterly. If data is not available, HCPF uses the Medicare Average Sales Price (ASP) minus 4.5%.
Are there any differences that may exist based on provider type or specialty and separate by benefit classifications as appropriate (inpatient, outpatient, emergency care, prescription drugs).	RMHP has different reimbursement levels based upon level of licensure. Scarce services may receive special consideration if	Reimbursement rates updated based on provider types. CMHCs are updated annually based on their updated Based Unit Cost and States updated RVU rates. FQHCs and Rural	The following include, but are not limited to, provider specialties/ expertise that could warrant additional compensation:	Yes, fee schedules vary depending on the provider type.	If it's within the scope of their practice, a provider would get the same rate regardless of provider type or specialty.

ESTABLISHING CHARGES/REIMBURSEMENT RATES **SCENARIO 3: RAE 1-7 AND HCPF FFS**					
QUESTION	**RAE 1 MH/SUD**	**RAE 2&4 MH/SUD**	**RAE 3&5 MH/SUD**	**RAE 6&7 MH/SUD**	**HCPF M/S**
	needed to fill a network need.	Health Centers encounter rates are updated based on rate updates conducted by HCPF. Independent OP providers receive standard FFS fee schedule which is reviewed and updated on periodic basis. Independent IP and residential facilities rates are determined based on usual and customary rates. NHP/HCI may negotiate rates, where appropriate, to ensure Members have access to covered services.	•Advanced degrees such as an MD, PhD, NP •Providers that serve populations who face barriers to access to care such as, deaf/hard of hearing, foreign language spoken, refugees, BIPOC, LGBTQ •Subspecialties		
How often is the current provider fee scheduled reviewed ?	Annually	There is no established timeframe for reviewing the IPN OP provider fee schedule, but it is done at minimum annually. It can be done more often if	At least annually and as indicated by factors such as inflation and market competitiveness.	CCHA continually monitors provider reimbursement using the criteria outlined above.	At least annually. Labs are updated quarterly.

ESTABLISHING CHARGES/REIMBURSEMENT RATES SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
		the review deems it appropriate.			
How are providers notified of changes to reimbursement rates?	Contract amendment	Contract amendment, but may be contacted through direct written notice.	Providers are notified of reimbursement changes in formal notices, through the COA Provider Portal, and Provider Newsletters.	Unilateral amendment via email and mailing to primary location on file.	Changes are communicated to providers through direct emails, provider bulletin, ColoradoPAR program website and direct communication with providers.
Is there a process for providers to negotiate reimbursement rates?	Providers can submit rates for RMHP review and consideration.	Providers may request review of their reimbursements in writing for consideration.	Each contract with a provider has the potential to be negotiated and/or customized for each provider relationship.	Providers can reach out to their designated contract manager. Fee schedules are negotiated with appropriate rationale.	Single case agreements are used for very limited situations where out of state hospital services are needed for services that the state doesn't have the ability to provide.

Establishing Charges/Reimbursement Rates

Findings: Scenario 3

The policies and procedures regarding establishing charges / reimbursement rates include process used, differences based on provider type or specialty, timeframes for reviewing fees, notifying providers, and negotiating rates. While differences exist in how the charges / reimbursement rates are determined, the processes are industry standard and are applied in a substantially similar and no more stringent method.

It is determined that these policies and procedures are parity compliant.

Scenario 4: Establishing Charges/Reimbursement Rates

ESTABLISHING CHARGES/REIMBURSEMENT RATES SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
What process is used to establish charges and reimbursement rates of payments for participant services rendered by providers? Please separate by benefit classifications as appropriate (inpatient, outpatient, emergency care, prescription drugs).	Utilizes established methods such as: DRG for IP; RBRVS, EAPG, and Colorado Medicaid fee schedule for OP. In addition, provider contracts may also include value based arrangements that provide incentives for meeting quality of care KPI's.	DHMC utilizes established reimbursement methods such as: DRG for inpatient; EAPG, and the Colorado Medicaid fee schedule for outpatient.
Are there any differences that may exist based on provider type or specialty and separate by benefit classifications as appropriate (inpatient, outpatient, emergency care, prescription drugs).	The following include, but are not limited to, provider specialties/ expertise that could warrant additional compensation: • Advanced degrees: MD, PhD, NP • Providers that serve populations who face barriers to access to care such as, deaf/hard of hearing, foreign language spoken, refugees, BIPOC, LGBTQ • Subspecialties	No
How often is the current provider fee scheduled reviewed ?	At least annually	As updates are received
How are providers notified of changes to reimbursement rates?	Formal notices, COA Provider Portal, and Provider Newsletters	Provider website, provider newsletters, and direct communication if appropriate.
Is there a process for providers to negotiate reimbursement rates?	Each contract with a provider has the potential to be negotiated and/or customized for each provider relationship.	DHMC negotiates rate with each provider directly during the contracting process.

Establishing Charges/Reimbursement Rates

Findings: Scenario 4

The policies and procedures regarding establishing charges / reimbursement rates include process used, timeframes for reviewing fees, notifying providers, and negotiating rates. While differences exist in how the charges / reimbursement rates are determined, the processes are industry standard and are applied in a substantially similar and no more stringent method. There are differences in how provider type or specialty are handled, but the MH/SUD providers have the ability to negotiate their payment for care due to managed care and are not limited to what FFS pays, and therefore this comparison is more lenient for MH/SUD.

It is determined that these policies and procedures are parity compliant.

Appendix L - Restrictions Based on Geographic Location/Facility Type, Provider Specialty

Description: Health plan policies on recruitment, credentialing, and enrollment of network providers to include any exclusionary criteria.

Tools for Analysis: Data request, interviews with health plan staff, and policies/procedures documents referencing provider network selection criteria for network admission, credentialing and recredentialing of MH/SUD and M/S providers, provider appeals process, and utilization of national accrediting standards.

Summary of Results: The following table illustrates the characteristics of each scenario including health plans being compared, applicable benefit categories, whether differences were found in the analysis, and compliance finding.

	Used by	Benefit Categories	Differences between M/S and MH/SUD	Compliance Determined
Scenario 1	HCPF	*N/A*	No	✓Yes
Scenario 2	RMHP and Prime MCO	*N/A*	No	✓Yes
Scenario 3	RAE 1	*N/A*	No	✓Yes
	RAE 2 and 4	*N/A*	No	✓Yes
	RAE 3 and 5	*N/A*	No	✓Yes
	RAE 6 and 7	*N/A*	No	✓Yes
Scenario 4	Denver PIHP and Denver Health MCO	*N/A*	No	✓Yes

Analysis: No health plans currently place restrictions based on geographic location, facility type, or provider specialty.

Appendix M - Network Adequacy Determination

Description: The health plan's policy and protocols for determining the sufficiency of the provider network to substantiate participant needs, timely access to care, provider diversity, and compliance with applicable regulations and contract standards.

Tools for Analysis: Data request, interviews with health plan staff, and policies/procedures documents referencing provider adequacy policies to include timely access to care, as well as target provider counts and diversity, frequency of adequacy reviews, and reports to HCPF.

Summary of Results: The following table illustrates the characteristics of each scenario including health plans being compared, applicable benefit categories, whether differences were found in the analysis, and compliance finding.

	Used by	Benefit Categories	Differences between M/S and MH/SUD	Compliance Determined
Scenario 1	HCPF	IP, OP, EC, PD	No	✓Yes
Scenario 2	RMHP and Prime MCO	IP, OP, EC, PD	No	✓Yes
Scenario 3	RAE 1	IP, OP, EC, PD	No	✓Yes
	RAE 2 and 4	IP, OP, EC, PD	No	✓Yes
	RAE 3 and 5	IP, OP, EC, PD	No	✓Yes
	RAE 6 and 7	IP, OP, EC, PD	No	✓Yes
Scenario 4	Denver PIHP and Denver Health MCO	IP, OP, EC, PD	No	✓Yes

Results by Scenario: On the following pages, each scenario is expanded into an overview of primary policies that impact this NQTL.

Scenario 1: Network Adequacy Determination

NETWORK ADEQUACY DETERMINATION SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
Which benefit classifications do you have services subject to this NQTL? (inpatient, outpatient, emergency care, prescription drugs)	IP, OP, EC, PD	IP, OP, EC, PD
How does the plan determine an adequate number of providers in the network? Are there differences by specialty?	Regional comparisons by county, year-over-year comparisons, multiple metrics as a whole, and stakeholder feedback. The process also looks to ensure adequate specialty providers.	Regional comparisons by county, year-over-year comparisons, multiple metrics as a whole, and stakeholder feedback. The process also looks to ensure adequate specialty providers.
What process does the plan follow for maintaining network adequacy?	Consistent evaluation, engagement, and intervention when necessary	Consistent evaluation, engagement, and intervention when necessary
How frequently does the plan report on network adequacy?	Reporting is required at least quarterly.	Reporting is required at least quarterly.
What strategies does the plan use to address identified deficiencies in the network?	The strategies used depend on the data and conclusions.	The strategies used depend on the data and conclusions.

Network Adequacy Determination

Findings: Scenario 1

The policies and procedures regarding network adequacy determination include determining adequacy, maintaining adequacy, reporting, and strategies to address deficiencies. These policies and procedures for MH/SUD services are the same as the policies and procedures of M/S services, and follow standard industry practice. As required in contract, all plans report on network adequacy to HCPF quarterly.

It is determined that these policies and procedures are parity compliant.

Scenario 2: Network Adequacy Determination

NETWORK ADEQUACY DETERMINATION SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
Which benefit classifications do you have services subject to this NQTL? (inpatient, outpatient, emergency care, prescription drugs)	IP, OP, EC, PD	IP, OP, EC, PD

NETWORK ADEQUACY DETERMINATION **SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO**		
QUESTION	**MH/SUD**	**M/S**
How does the plan determine an adequate number of providers in the network? Are there differences by specialty?	Pharmacy: In network: Our nationwide network allows the Member to have no restrictions on location for retail pharmacy. Specialty and Home delivery pharmacies are limited to Optum Specialty and Optum Home Delivery as preferred. Out of network: A member would have to pay out of pocket and request coverage via a DMR or manual claim. IP/OP/EC: RMHP Contracts with all willing inpatient facilities and regularly measure adequacy against State benchmarks and reports those results to the State quarterly.	Pharmacy: In network: Our nationwide network allows the Member to have no restrictions on location for retail pharmacy. Specialty and Home delivery pharmacies are limited to Optum Specialty and Optum Home Delivery as preferred. Out of network: A member would have to pay out of pocket and request coverage via a DMR or manual claim. IP/OP/EC: RMHP Contracts with all willing inpatient facilities and regularly measure adequacy against State benchmarks and reports those results to the State quarterly.
What process does the plan follow for maintaining network adequacy?	Pharmacy: Creating a broad and inclusive network is important to ensure access to our Members. Optum Specialty and Optum Home Delivery add value and streamlines the process for our Members to access specialty drugs and delivery services. Having more than one vendor for Specialty (with the exception of limited distribution drugs) and Home Delivery can cause some confusion for both the Members and prescribers attempting to utilize these services IP/OP/EC: RMHP Contracts with all willing providers and regularly measures adequacy against State benchmarks	Pharmacy: Creating a broad and inclusive network is important to ensure access to our Members. Optum Specialty and Optum Home Delivery add value and streamlines the process for our Members to access specialty drugs and delivery services. Having more than one vendor for Specialty (with the exception of limited distribution drugs) and Home Delivery can cause some confusion for both the Members and prescribers attempting to utilize these services IP/OP/EC: RMHP Contracts with all willing providers and regularly measures adequacy against State benchmarks and reports those results to the State quarterly. Network adequacy is measured and

NETWORK ADEQUACY DETERMINATION SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
	and reports those results to the State quarterly. Network adequacy is measured and reported annually to our Network Advisory Committee.	reported annually to our Network Advisory Committee.
How frequently does the plan report on network adequacy?	Pharmacy: Quarterly IP/OP/EC: Network reports are supplied to the State on a quarterly basis.	Pharmacy: Quarterly IP/OP/EC: Network reports are supplied to the State on a quarterly basis.
What strategies does the plan use to address identified deficiencies in the network?	Pharmacy: Attempt to contract any pharmacy in the area that is determined to be inadequate. If there are no pharmacies available, make the Members aware of mail order opportunity. IP/OP/EC: RMHP Contracts with all willing inpatient facilities and regularly measure adequacy against State benchmarks. RMHP works with various community stakeholders in an effort to expand services where needed.	Pharmacy: Attempt to contract any pharmacy in the area that is determined to be inadequate. If there are no pharmacies available, make the Members aware of mail order opportunity. IP/OP/EC: RMHP Contracts with all willing inpatient facilities and regularly measure adequacy against State benchmarks. RMHP works with various community stakeholders in an effort to expand services where needed.

Network Adequacy Determination

Findings: Scenario 2

The policies and procedures regarding network adequacy determination include determining adequacy, maintaining adequacy, reporting, and strategies to address deficiencies. These policies and procedures for MH/SUD services are the same as the policies and procedures of M/S services, and follow standard industry practice. As required in contract, all plans report on network adequacy to HCPF quarterly.

It is determined that these policies and procedures are parity compliant.

Scenario 3: Network Adequacy Determination

NETWORK ADEQUACY DETERMINATION SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
Which benefit classifications do you have services subject to this NQTL? (inpatient, outpatient, emergency care, prescription drugs)	IP, OP, EC	IP, OP, EC	IP, OP, EC	IP, OP, EC	IP, OP, EC
How does the plan determine an adequate number of providers in the network? Are there differences by specialty?	RMHP Contracts with all willing inpatient facilities and regularly measure adequacy against State benchmarks and reports those results to the State quarterly.	The plan monitors the network to ensure there is sufficient providers in the network to meet the requirements of the members for access to care to serve all behavioral health needs and allow for member freedom of choice.[75]	Within the comprehensive Network Adequacy report is the Geoaccess report that calls out specialties that are not meeting member to provider time and distance standards and member to provider ratio standards. This is a baseline to our recruitment	CCHA conducts quarterly Network Adequacy reviews as required by HCPF to ensure we have a robust behavioral health network. If our network is deficient in any geographic area or deficient in a provider type, CCHA works to ensure members are able to receive medically	Regional comparisons by county, year-over-year comparisons, multiple metrics as a whole, and stakeholder feedback. The process also looks to ensure adequate specialty providers.

[75] The following network adequacy factors are considered: Anticipated Medicaid enrollment; Expected utilization of services, characteristics and health needs of specific Medicaid populations in the region; Numbers, types, and specialties of network providers required to furnish the contracted Medicaid services; Number of network providers accepting new Medicaid members; Geographic location of providers in relationship to where Medicaid members live, considering distance, travel time, and means of transportation used by members; Ability of providers to communicate with limited-English-proficient members in their preferred language; Ability of network providers to ensure physical access, reasonable accommodations, culturally competent communications, and accessible equipment for members with physical or mental disabilities; Availability of triage lines or screening systems, as well as use of telemedicine, e-visits, and/or other technology solutions.

NETWORK ADEQUACY DETERMINATION **SCENARIO 3: RAE 1-7 AND HCPF FFS**					
QUESTION	**RAE 1 MH/SUD**	**RAE 2&4 MH/SUD**	**RAE 3&5 MH/SUD**	**RAE 6&7 MH/SUD**	**HCPF M/S**
			activity. There are differences in specialties. SUD providers continue to be unmet according to standards and there is an ongoing effort to recruit more providers and add levels of care with current providers.	necessary services as no cost to them, whether through an out-of-network provider, telemedicine, etc. Contractual network deficiency requirement- if our network is deficient in any way we have to alert the state with a notice and a remediation plan. If gaps in the existing network are identified, the Behavioral Health Provider Recruitment Strategy (policy) would be leveraged to bridge gaps.	
What process does the plan follow for maintaining network adequacy?	RMHP Contracts with all willing providers and regularly measures adequacy against State benchmarks and reports those results to the State quarterly. Network adequacy	NHP/HCI creates and maintains fee schedules with Medicaid appropriate rates, uses available tools to determine usual and customary rates including, but not limited to, Colorado	Two workgroups established to address network adequacy. The provider maintenance and retention workgroup work on keeping current contracted providers up-to-	CCHA monitors and tracks changes in the network that could affect sufficiency of service delivery, availability, or provider capacity on an ongoing basis. CCHA notifies HCPF when network	Consistent evaluation, engagement, and intervention when necessary

NETWORK ADEQUACY DETERMINATION **SCENARIO 3: RAE 1-7 AND HCPF FFS**					
QUESTION	**RAE 1 MH/SUD**	**RAE 2&4 MH/SUD**	**RAE 3&5 MH/SUD**	**RAE 6&7 MH/SUD**	**HCPF M/S**
	is measured and reported annually to our Network Advisory Committee.	Fee For Services Medicaid Rates, CMS Reimbursement Rates, or market standards. NHP/HCI may negotiate rates, where appropriate, to ensure Members have access to covered services. NHP/HCI monitors compliance to access standards by conducting outbound calls to practices to audit appointment availability.	date. The provider recruitment workgroup works specifically on recruiting providers identified as needed through the provider network adequacy assessment, internal request from Care Management, Utilization Management, or external request/referral from providers, members, etc	changes are significant and result in a deficiency within the network.	
How frequently does the plan report on network adequacy?	Quarterly	Quarterly	Quarterly	Quarterly	Quarterly
What strategies does the plan use to address identified deficiencies in the network?	RMHP Contracts with all willing inpatient facilities and regularly measure adequacy against State benchmarks. RMHP works with various community stakeholders in an	NHP/HCI reviews network adequacy to ensure the availability of behavioral health care providers	Direct outreach to providers in specialties identified as deficient.	If gaps in the existing network are identified, the Behavioral Health Provider Recruitment Strategy (policy) would be leveraged to bridge gaps.	The strategies used depend on the data and conclusions.

NETWORK ADEQUACY DETERMINATION SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
	effort to expand services where needed.	within its delivery system.[76]			

Network Adequacy Determination

Findings: Scenario 3

The policies and procedures regarding network adequacy determination include determining adequacy, maintaining adequacy, reporting, and strategies to address deficiencies. These policies and procedures for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice. As required in contract, all plans report on network adequacy to HCPF quarterly.

It is determined that these policies and procedures are parity compliant.

[76] NHP/HCI: Defines the types of behavioral health care practitioners and providers in its delivery system; Uses an updated and accurate list, in assessing the number of providers with expertise in key culturally based populations; Uses quantifiable and measurable standards for the number of members, by county, through the enrollment file, within the key population groups; Has quantifiable and measurable standards for the geographic distribution of providers. Analyzes performance against the standards annually; Determining any existing gap by a comparison of availability of providers as well as reviewing findings in Member and Family Affairs surveys or through contacts/surveys with advocacy organization of key populations (for examples children in foster care)

Scenario 4: Network Adequacy Determination

NETWORK ADEQUACY DETERMINATION SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
Which benefit classifications do you have services subject to this NQTL? (inpatient, outpatient, emergency care, prescription drugs)	IP, OP, EC, PD	IP, OP, EC, PD
How does the plan determine an adequate number of providers in the network? Are there differences by specialty?	Within the comprehensive Network Adequacy report is the Geoaccess report that calls out specialties that are not meeting member to provider time and distance standards and member to provider ratio standards. This is a baseline to our recruitment activity. There are differences in specialties. SUD providers continue to be unmet according to standards and there is an ongoing effort to recruit more providers and add levels of care with current providers.	DHMC is compliant with the HCPF the quarterly network adequacy reporting requirements. The comprehensive report includes Geoaccess to review time and distance standards to provider offices as well as provider to member ratios. The report includes a variety of different provider types.
What process does the plan follow for maintaining network adequacy?	Two workgroups established to address network adequacy. The provider maintenance and retention workgroup work on keeping current contracted providers up-to-date. The provider recruitment workgroup works specifically on recruiting providers identified as needed through the provider network adequacy assessment, internal request from Care Management, Utilization Management, or external request/referral from providers, members, etc.	The quarterly network adequacy reports are discussed during the bi-monthly Network Management Committee (NMC) meeting. The NMC reviews all aspects of network adequacy that includes requests to the utilization management team, care management team, health plan services team, and the grievances and appeals team. DHMC utilizes CAHPS surveys to understand the perception of members regarding network adequacy. Based on the committee review, if an area is determined to be deficient, the Provider Relations team will identify and outreach to providers that provide the service of the deficiency.
How frequently does the plan report on network adequacy?	Quarterly	Quarterly

NETWORK ADEQUACY DETERMINATION **SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO**		
QUESTION	**MH/SUD**	**M/S**
What strategies does the plan use to address identified deficiencies in the network?	Direct outreach to providers in specialties identified as deficient.	The Provider Relations team will identify and outreach to providers that provide the service of the deficiency.

Network Adequacy Determination

Findings: Scenario 4

The policies and procedures regarding network adequacy determination include determining adequacy, maintaining adequacy, reporting, and strategies to address deficiencies. These policies and procedures for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice. As required in contract, all plans report on network adequacy to HCPF quarterly.

It is determined that these policies and procedures are parity compliant.

Appendix N - Out-Of-Network Provider Access Standards

Description: Policies and protocols that health plans utilize to ensure participant timely access and medically-necessary care when unavailable through in-network providers.

Tools for Analysis: Data request, interviews with health plan staff, and policies/procedures documents referencing out-of-network provider policies and procedures to include timely access to medically-necessary services, and utilization and frequency of single case agreements.

Summary of Results: The following table illustrates the characteristics of each scenario including health plans being compared, applicable benefit categories, whether differences were found in the analysis, and compliance finding.

	Used by	Benefit Categories	Differences between M/S and MH/SUD	Compliance Determined
Scenario 1	HCPF	IP, OP, EC	No	✓Yes
Scenario 2	RMHP and Prime MCO	IP, OP, EC, PD	No	✓Yes
Scenario 3	RAE 1	IP, OP, EC	No	✓Yes
	RAE 2 and 4	IP, OP, EC	No	✓Yes
	RAE 3 and 5	IP, OP, EC	No	✓Yes
	RAE 6 and 7	IP, OP, EC	No	✓Yes
Scenario 4	Denver PIHP and Denver Health MCO	IP, OP, EC, PD	No	✓Yes

Results by Scenario: On the following pages, each scenario is expanded into an overview of primary policies that impact this NQTL.

Scenario 1: Out-Of-Network Provider Access Standards

OUT-OF-NETWORK PROVIDER ACCESS STANDARDS SCENARIO 1: HCPF FFS		
QUESTION	**MH/SUD**	**M/S**
Which benefit classifications do you have services subject to this NQTL? (inpatient, outpatient, emergency care, prescription drugs)	IP, OP, EC	IP, OP, EC
Can both a member and a provider make the request for out-of-network services?	Yes	Yes
What criteria are necessary for the plan to allow out-of-network providers to bill for services?	For non-emergent IP hospital services in out-of-network hospitals to be allowed, the services must not be available in Colorado.[77]	For non-emergent IP hospital services in out-of-network hospitals to be allowed, the services must not be available in Colorado.[78]
What process does the plan have for out-of-network providers to bill for services?	Enrollment. Providers must be enrolled for payment. HCPF can walk them through enrollment if it's urgent.	Enrollment. Providers must be enrolled for payment. HCPF can walk them through enrollment if it's urgent.

Out-Of-Network Provider Access Standards

Findings: Scenario 1

The policies and procedures regarding out-of-network provider access standards include requesting services, criteria for allowing out-of-network services, and process for billing services. These policies and procedures for MH/SUD services are the same as the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 2: Out-Of-Network Provider Access Standards

OUT-OF-NETWORK PROVIDER ACCESS STANDARDS SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
Which benefit classifications do you have services subject to this NQTL? (inpatient,	IP, OP, EC, PD. Benefit levels for out of network services are the same for all	IP, OP, EC, PD. Benefit levels for out of network services are the same for all services

[77] The term in-network and out-of-network is not used by FFS UM since the ColoradoPAR program serves the entire state of Colorado and look at in-state and out-of-state (OOS) providers. Some border facilities are considered in-state. Both OOS and in-state providers need to be enrolled with Medicaid to bill for services and the authorization policies are the same.
[78] Ibid.

OUT-OF-NETWORK PROVIDER ACCESS STANDARDS SCENARIO 2: RAE 1 AND ROCKY MOUNTAIN HEALTH PLAN PRIME MCO		
QUESTION	**MH/SUD**	**M/S**
outpatient, emergency care, prescription drugs)	services with the exception of urgent/emergent care which is always covered.	with the exception of urgent/emergent care which is always covered.
Can both a member and a provider make the request for out-of-network services?	Pharmacy: No, only members IP/OP/EC: Yes	Pharmacy: No, only members IP/OP/EC: Yes
What criteria are necessary for the plan to allow out-of-network providers to bill for services?	Pharmacy: N/A Urgent and Emergent Care is always allowed Out of Network. Additionally, if a service is not available within network, out of network services will be allowed and also in situations of continuity of care.	Pharmacy: N/A Urgent and Emergent Care is always allowed Out of Network. Additionally, if a service is not available within network, out of network services will be allowed and also in situations of continuity of care.
What process does the plan have for out-of-network providers to bill for services?	Pharmacy: N/A Urgent and Emergent Care can be billed in all cases. Out of Network care must be prior authorized. In some cases, a Single Case Agreement will be negotiated.	Pharmacy: N/A Urgent and Emergent Care can be billed in all cases. Out of Network care must be prior authorized. In some cases, a Single Case Agreement will be negotiated.

Out-Of-Network Provider Access Standards

Findings: Scenario 2

The policies and procedures regarding out-of-network provider access standards include requesting services, criteria for allowing out-of-network services, and process for billing services. These policies and procedures for MH/SUD services are the same as the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 3: Out-Of-Network Provider Access Standards

OUT-OF-NETWORK PROVIDER ACCESS STANDARDS SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
Which benefit classifications do you have services subject to this NQTL? (inpatient, outpatient, emergency care, prescription drugs)	IP, OP, EC	IP, OP, EC	IP, OP, EC	IP, OP, EC	IP, OP, EC
Can both a member and a provider make the request for out-of-network services?	Yes	Yes	Yes	Yes	Yes
What criteria are necessary for the plan to allow out-of-network providers to bill for services?	Urgent and Emergent Care is always allowed Out of Network. Additionally, if a service is not available within network, out of network services will be allowed and also in situations of continuity of care.	Provider must meet criteria to serve members as out-of-network provider: Medicaid enrolled, meets credentialing / quality standards, accepts reasonable reimbursement for services. The provider must sign a Single Case Agreement with agreed upon reimbursement	If COA is unable to accommodate the request for services with a network provider (e.g., due to geography, provider specialty, or continuity of care), then the services are authorized for the out-of-network provider. This is consistent with industry standards.	CCHA allows out-of-network providers to bill for services if a member requires a medically necessary service that is not available from an in-network provider.	For non-emergent inpatient hospital services in out-of-network hospitals to be allowed, the services must not be available in Colorado.[79]

[79] The term in-network and out-of-network is not used by FFS UM since the ColoradoPAR program serves the entire state of Colorado and look at in-state and out-of-state (OOS) providers. Some border facilities are considered in-state. Both OOS and in-state providers need to be enrolled with Medicaid to bill for services and the authorization policies are the same.

OUT-OF-NETWORK PROVIDER ACCESS STANDARDS SCENARIO 3: RAE 1-7 AND HCPF FFS					
QUESTION	RAE 1 MH/SUD	RAE 2&4 MH/SUD	RAE 3&5 MH/SUD	RAE 6&7 MH/SUD	HCPF M/S
		rates and services for execution.			
What process does the plan have for out-of-network providers to bill for services?	Urgent and Emergent Care can be billed in all cases. Out-of-network care must be prior authorized. In some cases, a Single Case Agreement will be negotiated.	Out-of-network providers are required to follow standard billing process including timely filing timeframes and claims submission process for all providers. The provider is required to follow HCPF's Uniform Service Coding Standards.	PAR required for all services rendered with an out-of-network provider. If the COA is unable to accommodate the request for services with a network provider (e.g., due to geography, provider specialty, or continuity of care), services are authorized for the out-of-network provider. This is consistent with industry standards.	Out-of-network providers are issued an OON agreement if they agree to CCHA's rate schedule. If they do not agree, CCHA will issue a Single Case Agreement for the negotiated rate.	Enrollment. Providers must be enrolled for payment. HCPF can walk them through enrollment if it's urgent.

Out-Of-Network Provider Access Standards

Findings: Scenario 3

The policies and procedures regarding out-of-network provider access standards include requesting services, criteria for allowing out-of-network services, and process for billing services. These policies and procedures for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Scenario 4: Out-Of-Network Provider Access Standards

OUT-OF-NETWORK PROVIDER ACCESS STANDARDS SCENARIO 4: DENVER HEALTH PIHP AND DENVER HEALTH MCO		
QUESTION	**MH/SUD**	**M/S**
Which benefit classifications do you have services subject to this NQTL? (inpatient, outpatient, emergency care, prescription drugs)	IP, OP, EC, PD	IP, OP, EC, PD
Can both a member and a provider make the request for out-of-network services?	Yes	Yes
What criteria are necessary for the plan to allow out-of-network providers to bill for services?	If COA is unable to accommodate the request for services with a network provider (e.g., due to geography, provider specialty, or continuity of care), then the services are authorized for the out-of-network provider. This is consistent with industry standards.	There are instances where a member may retain their out of network provider (e.g., pregnant women with established care already in second or third trimester). If DHMC is unable to accommodate the request for services with a network provider (e.g., due to geography, provider specialty), then the services are authorized for the out-of-network provider.
What process does the plan have for out-of-network providers to bill for services?	PAR required for all services rendered with an out-of-network provider. If the COA is unable to accommodate the request for services with a network provider (e.g., due to geography, provider specialty, or continuity of care), then the services are authorized for the out-of-network provider. This is consistent with industry standards.	DHMC requires PAR for all services rendered with an out-of-network provider.

Out-Of-Network Provider Access Standards

Findings: Scenario 4

The policies and procedures regarding out-of-network provider access standards include requesting services, criteria for allowing out-of-network services, and process for billing services. These policies and procedures for MH/SUD services are substantially similar to the policies and procedures of M/S services, and follow standard industry practice.

It is determined that these policies and procedures are parity compliant.

Appendix O - Availability of Information

All Colorado Medicaid members receiving MH/SUD benefits, whether through FFS, RAEs, or MCOs, are required to be provided with: 1) the criteria utilized to determine medical necessity; and 2) the reason for denial of payment or reimbursement for MH/SUD services. The requirements for availability of information are as follows:

- Criteria for medical necessity determinations regarding MH/SUD benefits must be made available to enrollees, potential enrollees, and contracting providers upon request.
- The reasons for any denial of reimbursement or payment for MH/SUD benefits must be made available to the beneficiary.

All plans reviewed have provided substantial evidence that they are compliant with this parity requirement.

CATEGORY	CRITERIA FOR MEDICAL NECESSITY	REASONS FOR DENIAL
HCPF FFS	Established by contract with the FFS UM vendor. The definition for medical necessity is mandated by the State and the criteria are agreed to in contract. Specifics of InterQual's proprietary medical necessity criteria is not publicly available. But for MH/SUD, PBT criteria is accessible on HCPF's website and made available to enrollees, potential enrollees, and contracting providers upon request.	The Colorado Medicaid member handbook delineates the policy and process for notifying members of the reason for denial of payment. *For any decision that affects Colorado Medicaid coverage or services, providers and members receive a letter. The letter is called a* ***Notice of Action*** *or a* ***Notice of Adverse Benefit Determination****. It tells members what the decision is, why the decision was made, and how to appeal if members disagree.* *For members under age 21, any medical necessity denial states how the member did not meet any requirements under EPSDT.*
RAE 1	The process and criteria for medical necessity decision-making is delineated in the RMHP Provider Manual – Care Management Decision Making section.	
RAE 2 & 4	The Carelon Behavioral Health Inc Colorado Medicaid Provider Handbook, located on NHP and HCI webpages, states: *"Carelon's clinical criteria, also known as medical necessity criteria, are based on nationally recognized*	Carelon Behavioral Health Inc utilizes the Colorado Medicaid member handbook which delineates the policy and process for notifying members of the reason for denial of payment or reimbursement. *For any decision that affects Colorado Medicaid coverage or services, members*

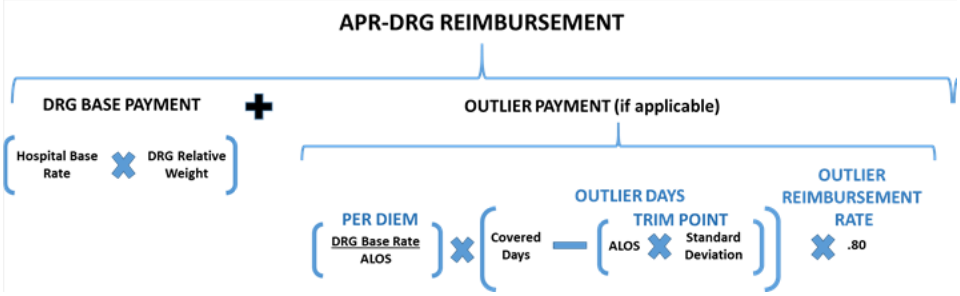
CATEGORY	CRITERIA FOR MEDICAL NECESSITY	REASONS FOR DENIAL
	resources, including but not limited to, those publicly disseminated by InterQual, the American Medical Association (AMA), American Psychiatric Association (APA), and American Academy of Child and Adolescent Psychiatry (AACAP), Substance Abuse and Mental Health Services Administration (SAMHSA), the American Society of Addiction Medicine (ASAM), MCG (formerly known as Milliman Care Guidelines), and the Centers for Medicare and Medicaid Services (CMS). For the management of substance use services, Carelon uses ASAM criteria. *Carelon's medical necessity criteria are reviewed at least annually, and during the review process, Carelon will leverage its Scientific Review Committee to provide input on new scientific evidence when needed. Medical necessity criteria are reviewed and approved by Carelon's Corporate Medical Management Committee (CMMC) and the Executive Oversite Committee (EOC).* *Network providers are given an opportunity to comment or give advice on the development or adoption of UM criteria and on instructions for applying the criteria. These comments and opinions are solicited through practitioner participation on committees and through provider requests for review. You may visit the RAEs website.* *Carelon facilitates discussions with outside senior consultants in the field as well as other practicing professionals. Carelon also*	*receive a letter. The letter is called a **Notice of Action** or a **Notice of Adverse Benefit Determination**. It tells members what the decision is, why the decision was made, and how to appeal if members disagree.*

CATEGORY	CRITERIA FOR MEDICAL NECESSITY	REASONS FOR DENIAL
	leverages various criteria sets from other utilization management organizations and third-party payers. In addition, Carelon disseminates criteria sets via the website, provider handbook, provider forums, newsletters, and individual training sessions. Upon request, members are provided copies of Carelon's medical necessity criteria free of charge. Access to the Carelon's medically necessary criteria is available on the RAEs website. To order a copy of the ASAM criteria, please go to the following website: LINK"	
RAE 3 & 5	COA policy CCS302 outlines the procedures for making medical necessity criteria readily available to beneficiaries and providers. *A. All Utilization Review criteria are available to members, potential members, and affected practitioners upon request.* *New or revised criteria are published and disseminated in the applicable provider manuals and on the company web page.*	COA policy CCS302 outlines the procedures for notifying members of denial of reimbursement or payment, as well as the reason for denial. *All adverse benefit determination notifications sent to members and providers include instructions on how to obtain a copy of the criteria used in the review.*
RAE 6 & 7	CCHA utilizes nationally recognized, evidence-based medical necessity criteria that includes current editions of MCG criteria and American Society of Addiction Medicine (ASAM) for all levels of care under the BH Capitation	CCHA utilizes nationally recognized, evidence-based medical necessity criteria that includes current editions of MCG criteria and American Society of Addiction Medicine (ASAM) for all levels of care under the BH Capitation
Denver Health PIHP	COA policy CCS302 outlines the procedures for making medical necessity criteria readily available to beneficiaries and providers. *A. All Utilization Review criteria are available to members, potential members, and affected practitioners upon request.*	COA policy CCS302 outlines the procedures for notifying members of denial of reimbursement or payment, as well as the reason for denial *All adverse benefit determination notifications sent to members and providers include instructions on how to obtain a copy of the criteria used in the review.*

CATEGORY	CRITERIA FOR MEDICAL NECESSITY	REASONS FOR DENIAL
	New or revised criteria are published and disseminated in the applicable provider manuals and on the company web page.	

Appendix P – Summary of APR-DRG/RAC vs Authorization/Per Diem Systems

APR-DRG/RAC System



Each claim is assigned a DRG (retrospectively by the claim system/3M after the claim is submitted). That DRG is determined by the diagnoses and services documented on the claim:

- Related outpatient services, including observation, that occur immediately prior to an inpatient admission are included as part of the inpatient claim. This allows services provided during that time to influence the DRG assignment and better represent one episode of care.

Each DRG has an Average Length of Stay (ALOS) and Trim Point (ALOS x Standard Deviation) assigned.

The payment methodology equation is comprised of two main elements: the DRG Base Payment and Outlier Payment for Outlier Days:

DRG Base Payment: Hospital-Specific Base Rate multiplied by the Relative Weight of the DRG in which the claim is grouped.

Outlier Days: For any days a patient remains in the hospital beyond the Trim Point, the hospital is paid at a rate of 80% of the per diem. Outlier days are calculated as follows: DRG base rate / ALOS = Per Diem * 80% = Outlier Per Diem Rate. **Outlier Payment** = (Covered Days – Trim Point) * .80.

- Covered days are days the client was Medicaid eligible during the inpatient portion of the claim. Days during outpatient/observation are not counted towards covered days.

The Recovery Audit Contractor (RAC) uses proprietary software programs to identify potential payment errors in areas such as duplicate payments, fiscal intermediaries' mistakes, medical necessity, and coding. In addition, the contract includes determining if documentation supports the inpatient versus observation status. These reviews are retrospective. The whole concept of DRGs reimbursement is incompatible with concurrent reviews as the system is based on trim points that drive the same reimbursement level when the length of stay is

within those trim points, and a reduced rate outlier payment is applied when it goes beyond it.

PAR/CCR/Per Diem System

For mental health and substance use disorder services, an authorization process is in place that occurs both prior to admission to an inpatient setting and on a concurrent basis to determine the need for continued length of stay. This process is conducted by both the RAE's and MCO's. Claims are generally paid by special fee schedules that are paid on a per diem basis.