

HCPF IMD Forum

Monthly on the Last Thursday of each month – 2 PM

Forum Agenda 9/28/2023

Introduction & Welcome.....5 Minutes

8/31/23 Forum Discussion Summary.....20 Minutes

RAE Denials Data & COM review and discussion

Continuum of Care Access discussion.....20 Minutes

Admissions to State Mental Hospital discussion.....10 Minutes

Open Discussion on next steps & Wrap-up.....5 Minutes

Barriers Identified

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

8/31 Discussion Summary

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

Today's meeting will continue the discussion on barriers:

- Continuum of Care access concerns
- Challenges surrounding admissions to Colorado State Mental Health Hospitals.

COM follow-up

Please expect email communication from Danielle McKibbon.

- Please return surveys to Danielle by October 12, 2023
- Involuntary Medications with Facility Transfers – report overview

IMD Denial Data

IMD Decisions by RAE April 1st, 2022 - March 30th, 2023						Some data timeframes were unable to align to original data set
RAE	Decision Status	Description	Denied Decisions	Total Decisions	% Denied Decisions	% Denied Decisions
			Internal RAE Data			HCPF Dashboard Data
Region 1	Total					18.61%
	Denied	Administrative Denial				1.58%
		Not a Covered Benefit/Diagnosis				1.20%
		Not Medically Necessary				15.82%
Region 2	Total		60	1,013	5.90%	5.92%
	Denied	Administrative Denial	37		3.70%	3.95%
		Not a Covered Benefit/Diagnosis	0		0%	0%
		Not Medically Necessary	23		2.30%	1.97%
Region 3	Total		163	3,737	4.36%	5.37%
	Denied	Administrative Denial	11		0.29%	0.31%
		Not a Covered Benefit/Diagnosis	2		0.05%	0.08%
		Not Medically Necessary	150		4.01	4.99%
Region 4	Total		149	1,629	9.14%	8.88%
	Denied	Administrative Denial	98		6.00%	5.89%
		Not a Covered Benefit/Diagnosis	1		0.10%	0.07%
		Not Medically Necessary	50		3.10%	2.91%
Region 5	Total		72	1,963	3.66%	4.47%
	Denied	Administrative Denial	2		0.10%	0.14%
		Not a Covered Benefit/Diagnosis	0		0%	0%
		Not Medically Necessary	70		3.56	4.33%
Region 6 & 7 (combined)	Total	*July 1, 2022 through June 30, 2023*	194	1,774	10.93%	7.09%
	Denied	Administrative Denial	59		3.32%	0.82%
		Not a Covered Benefit/Diagnosis	0		0%	0.03%
		Not Medically Necessary	135		7.61%	6.26%
Region 8	Total		24	882	2.72%	3.29%
	Denied	Administrative Denial	1		0.001	0%
		Not a Covered Benefit/Diagnosis	0		0%	0%
		Not Medically Necessary	23		2.6	3.29%



IMD Denial Data Discussion

- Reviewing RAE data – Do RAEs see a difference in the "partial denials/partial approvals" authorizations percentages? Are there continued auth polices that may be impacting this?
- Quick Reminders:
 - HCPF Data Analytics team is in process finalizing the upcoming IBM dashboard
 - Member Readmit Data will be available at the October IMD Forum

Admissions to CMHHs

*SMHH: Colorado Mental Health Hospitals; aka – Colorado State-run Hospitals

	IMD #1	IMD #2	IMD #3	IMD #4	IMD#5
Awaiting state hospital bed (monthly average)	0	1	2	0.5	1

- How accurate is the initial data collected in the survey?
- What is the impact of this issue on your organization or facility?
- Does your facility have tracked data on this issue you would like to present or discuss?

Continuum of Care Access

- **HCPF Campus Policy Update**

- HCPF will be publishing a Campus Policy to address IMD restrictions in January, 2024

- **Mental Health Transitional Living Homes**

- <https://cdhs.colorado.gov/mental-health-transitional-living-homes>
- MHTL) Homes are part of a new program run by the [Office of Civil and Forensic Mental Health](#)
 - Will be used as a transition to a less restrictive setting for individuals with severe mental health conditions.
 - Clients may stay as long as necessary for stabilization with the ultimate goal of reintegrating clients successfully in the community.
- First beds in this program will be opening September through November 2023, with the second wave opening Spring, 2024.
 - During initial rollout, admission will be limited to referrals from the [CO State Mental Health Hospitals](#)
 - The program hopes to help alleviate the waitlist for the mental health hospitals by stepping down the individuals who have been awaiting appropriate community-based resources
- Bonnie Wright - CDHS, Director of Behavioral Health Group Homes, will be presenting at October Forum

RAE Walk-On Items

Discussion and Wrap-Up

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

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

Next Time....

1. COM presentation and discussion
2. Admission in another facility in same month data presentation
3. Overview of other state projects and strategies

Discussion Notes

- **RAE/MCE Denials Data:**
 - The discussion surrounding RAE/MCO Denial rates stemmed from the 2021 HMA Report which highlighted a perception among some IMD facilities that denial rates varied between RAEs.
 - Discussions surrounding RAE/MCE Denial rates and potential differences between Managed Care Entities were wrapped up
 - HCPF data was reviewed by the MCEs and MCEs were able to provide their own internal data as well
 - MCEs were able to further discuss the difference between capturing denials data by each individual patient's stay versus the number of days within each stay that are approved or denied.
 - After reviewing variances, several factors were discussed but no clear trend/cause was identified. It was agreed that HCPF and RAE would invest in the upcoming UM Dashboard targeted to go live in 2024.
- **COM discussion updates**
 - Danielle will reach out to IMD Providers with a survey to collect more data on this issue to take back to the Cross-Agency Committee on this topic
- **Admissions to State Mental Health Hospital discussion**
 - Danielle will reach out to the State Mental Health Hospitals to collect more information from the facilities on referrals from private IMDs as well as information on the barriers they are facing to admission at their facilities
- **Continuum of Care Access Discussion**
 - HCPFs proposed IMD Campus Policy was presented to the Forum attendees.
 - Policy will be live in 2024
 - Provided brief update regarding MHTL Homes going live in September and October



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Action Items

☐ HCPF:

- Distribution of surveys regarding State Hospital Admissions Barriers
- Follow-up with State Hospitals for possible details/information on Admission Barriers

☐ Provider Facilities:

- Respond to requests for information and surveys sent by HCPF

☐ MCEs:

- No Action Items at this time