# **COLORADO** Department of Health Care Policy & Financing



# Network Adequacy Quarterly Report Template

Managed Care Entity: Colorado Access Line of Business: *RAE 3* Contract Number: *19-107514A8* Contact Name: *Lisa Hug* Report Submitted by: *Brad Schrom* Report Submitted on: *4/29/2022* Report due by *04/29/2022*, covering the MCE's network from *01/01/2022 – 03/31/2022*, FY21-22 Q3

## -Final Copy: March 2021 Release-





### Contents

1.	Instructions for Using the Network Adequacy Quarterly Report Template1-1
	Definitions1-1
	Report Instructions
	Questions
2.	Network Adequacy
	Establishing and Maintaining the MCE Network
3.	Network Changes and Deficiencies
	Network Changes
	Inadequate Network Policies
4.	Appointment Timeliness Standards4-1
	Appointment Timeliness Standards
5.	Time and Distance Standards5-1
	Health Care Network Time and Distance Standards
A	Appendix A. Single Case Agreements (SCAs)
B	Appendix B. Optional MCE ContentB-1
	Instructions for Appendices
	Optional MCE Content
С	Appendix C. Optional MCE Content



### **1. Instructions for Using the Network Adequacy Quarterly Report Template**

This document contains the March 2021 release of a standardized template for use by all Colorado Medicaid or CHP+ Managed Care Entities (MCEs) for quarterly Network Adequacy (NA) reporting to the Colorado Department of Health Care Policy and Financing (HCPF). Each MCE should generate one quarterly NA report for each applicable line of business (i.e., CHP+ MCO, Medicaid MCO, and RAE); the report shall contain template elements applicable to the line of business. Network categories required for quarterly reporting are defined in the CO Network Adequacy Crosswalk Definitions (March 2021 version).

The practitioners, practice sites, and entities included in the quarterly NA report will include ordering, referring, and servicing contractors that provide care through a Colorado Medicaid or CHP+ MCE. To ensure consistent data collection across MCEs, each MCE must use this HCPF-approved report template (MS Word and MS Excel templates) to present the MCE's quarterly NA report and data for the corresponding practitioners, practice sites, and entities. Report due dates will align with those outlined in the MCE's contract, unless otherwise stated.

Fiscal Year Quarter Reported	Quarterly Reporting Deadline for HCPF	Reporting Date for Member and Network Files
FY 2020-21 Q3	April 2021	March 31, 2021
FY 2020-21 Q4	July 2021	June 30, 2021
FY 2021-22 Q1	October 2021	September 30, 2021
FY 2021-22 Q2	January 2022	December 31, 2021

### Definitions

- "MS Word template" refers to the CO Network Adequacy\_Quarterly Report Word Template\_F1\_0321 document.
- "MS Word MCE Data Requirements" refers to the *CO Network Adequacy\_MCE\_DataRequirements\_F1\_0321* document that contains instructions for each MCE's quarterly submission of member and network data.
- "MS Excel Geoaccess Compliance template" refers to the CO<20##-##>\_NAV\_FY<####> Q<#> QuarterlyReport\_GeoaccessCompliance\_<MCE Type>\_<MCE Name> spreadsheet.
  - MCEs will use this file to supply county-level results from their geoaccess compliance calculations, including practitioner to member ratios and time/distance calculations.
- Use the Colorado county designations from the Colorado Rural Health Center to define a county as urban, rural, or frontier; the most recent county-level map is available at the following website:
  - https://coruralhealth.org/resources/maps-resource
  - Note: Urban counties with rural areas (e.g., Larimer County) should be reported with the rural counties and use rural time/distance standards.



- A "practice site" or "practice" refers to a physical healthcare facility at which the healthcare service is performed.
- A "practitioner" refers to an individual that personally performs the healthcare service, excluding single case agreement (SCA) practitioners.
- An "entity" refers to a facility-level healthcare service location (e.g., hospital, pharmacy, imaging service facility, and/or laboratory).

### **Report Instructions**

Each MCE should use this template to generate one quarterly NA report for each applicable line of business (i.e., CHP+ MCO, Medicaid MCO, and RAE); the report shall contain template elements applicable to the line of business. The MCE should update the highlighted, italicized data fields on the cover page of this template to reflect their contact information, contract information, and report dates associated with the current report submission.

This report template contains a comprehensive list of NA requirements for the CHP+ MCO, Medicaid MCO, and RAE lines of business. Each table in this MS Word document contains a header row which confirms the applicable line(s) of business for each response. The table below shows expected network categories by MCE type. The accompanying MS Excel spreadsheets contain tabs in which network data can be imported (e.g., member counts, ratio results, time/distance calculation results).

Network Category	CHP+ MCO	Medicaid MCO	RAE
Facilities (Entities) (Hospitals, Pharmacies, Imaging Services, Laboratories)	Х	Х	
Prenatal Care and Women's Health Services	Х	Х	Х
Primary Care Providers (PCPs)	Х	Х	Х
Physical Health Specialists	Х	Х	
Behavioral Health Specialists ( <i>RAEs' network categories include Substance Use Disorder [SUD]</i> treatment coverage that went into effect on 1/1/2021)	Х		Х
Ancillary Physical Health Services (Audiology, Optometry, Podiatry, Occupational/Physical/Speech Therapy)	Х	Х	

### Questions

• Contact the MCE's Department contract manager or specialist for data submission instructions and assistance with questions or access to HCPF's FTP site.



### **Establishing and Maintaining the MCE Network**

<u>Supporting contract reference:</u> The MCE shall maintain a network that is sufficient in numbers and types of practitioners/practice sites to assure that all covered services to members will be accessible without unreasonable delay. The MCE shall demonstrate that it has the capacity to serve the expected enrollment in that service area.

- To count members, include each unique member enrolled with the MCE and line of business as of the last day of the measurement period (e.g., March 31, 2021, for the quarterly report due to the Department on April 30, 2021).
- To count practitioners/practice sites:
  - Include each unique practitioner/practice sites contracted with the MCE and line of business as of the last day of the measurement period (e.g., March 31, 2021, for the quarterly report due to the Department on April 30, 2021).
  - Define unique individual practitioners using Medicaid ID; a practitioner serving multiple locations should only be counted once for the count of practitioners and ratio calculations.

Define unique practice sites by de-duplicating records by location, such that a single record is shown for each physical location without regard to the number of individual practitioners at the location.

Poquiromont	Previous	Quarter	Current Quarter	
Requirement	Number	Percent	Number	Percent
Sample	0	0.0%	0	0.0%
CHP+ MCO, Medicaid MCO, RAE				
Total members	348121	N/A	353693	N/A
Total primary care practitioners (i.e., PROVCAT codes beginning with "PV" or "PG")	4654	N/A	4743	N/A
Primary care practitioners accepting new members	3203	68.82%	3251	68.54%
Primary care practitioners offering after-hours appointments New primary care practitioners contracted during the quarter		32.70%	1451	30.59%
		2.00%	147	3.07%
Primary care practitioners that closed or left the MCE's network during the quarter	61	1.31%	59	1.04%

#### Table 1A-Establishing and Maintaining the MCE Network: Primary Care Data



#### Table 1B-Establishing and Maintaining the MCE Network: Primary Care Discussion

Describe any barriers that affect the MCE's ability to maintain a sufficient network in number and type of primary care practitioners to assure that all covered services will be accessible to members without unreasonable delay.

If utilized, describe the impact telehealth services had in overcoming these barriers. Describe the methods used to monitoring the availability and usage of telehealth services.

#### CHP+ MCO, Medicaid MCO, RAE

Colorado Access (COA) monitors its Primary Care Medical Provider (PCMP) clinic sites across Region 3 to ensure adequate clinic to member ratio coverage. COA continues to review and grow its PCMP network, on a regular basis, to ensure all covered services continue to be accessible to members without unreasonable delay.

Colorado Access did not experience any barriers to Primary Care during this quarter that would negatively impact its ability to maintain a sufficient network. However, we are still seeing issues of workforce retention and burnout continue among providers in the network.

COA recognizes the struggle and continues to support providers' business operations and staffing needs in a variety of ways. COA supports by providing resources to reduce burnout professionally and operationally. COA also has positioned its Practice Supports and Provider Network Services provider-facing teams to train, educate and leverage core COA programs to support providers. These programs include contracting support, access to care standards, telehealth support, data and value-based care programs and incentives.

Regarding resources to support burnout, COA continues to share information to help healthcare providers and front-line staff. COA promotes resources tied to mental health support in the COVID-19 Provider Update and COA's provider newsletter, the Navigator.

From a program standpoint, COA contracted with the Office of Behavioral Health and Wellness at University of Colorado to address and redesign youth vaccinations and vaccine hesitancy. The implementation of this program reduces the burden on providers and front-line staff as it equipped them with tools to overcome the barriers they are facing with administering the COVID vaccine. As a leader in this work, COA made this program available to the CCHA (Colorado Community Health Alliance) provider network.

Every contracted Region 3 PCMP has an assigned practice facilitator from COA's Practice Support team. As a part of their engagement with providers, the facilitators monitor attribution, closed panels, and capped attribution as they work to support providers in increasing their engagement with their attributed members—something which aligns with the primary care value-based payment utilization component. COA has implemented new performance dashboards to help providers focus on priorities to help mitigate burnout and increase programmatic success for providers.



Describe any barriers that affect the MCE's ability to maintain a sufficient network in number and type of primary care practitioners to assure that all covered services will be accessible to members without unreasonable delay.

If utilized, describe the impact telehealth services had in overcoming these barriers. Describe the methods used to monitoring the availability and usage of telehealth services.

CHP+ MCO, Medicaid MCO, RAE

In addition, Practice Supports supported providers by maximizing funding potential in our valuebased payment program. On a monthly basis, COA Practice Supports staff share with providers the Provider Enhanced Payment Report (PEPR) to focus on engaged members and coordinate the services they need. As a result of sharing lists of engaged members monthly, providers' value-based payments increased, which has improved staff satisfaction in the practices.

COA's Practice Facilitators, along with Provider Network Managers (formally Provider Relations representatives), are regularly engaged with providers and quickly respond to barriers providers could face which may impact access to care. Through this high touch interaction, practice facilitators and network managers are quickly able to see turnover in provider offices and help support onboarding of specific new hires with training focused on Medicaid rules and regulations, such as the access to care standards.

Regarding family planning services, COA has worked directly with our reproductive health providers (OB/GYN), in regions 3 & 5 to develop a value-based payment model focused on family planning services. The newly developed Reproductive Health Model will go live in July 2022. COA believes this will support growth, provider satisfaction, and sustainability within the reproductive health network.

During Calendar Year 2021, 99% of the COA Region 3 (R3) PCMP network reported data on family planning services and 99% of R3 members were attributed to these sites. The average rate of family planning services, as reflected on a claim, across the R3 PMCP network during Calendar Year 2021 was 17.21% with a higher rate of 25.80% observed in the reproductive health provider cohort.

It is important to note that COA's ability to provide family planning services goes well beyond the number of OB/GYN providers in our network. Family planning services are made available to all members, both women and men through their primary care providers as family planning is not limited to women's health services. Therefore, COA has a very robust network of providers who perform family planning services to all its members.

Regarding telehealth, COA continues to educate providers on the new telehealth rules through webinars and provider resource groups hosted by its practice support team. COA is also promoting the use of telehealth in its provider newsletter, the Navigator, which helps educate providers on new



Describe any barriers that affect the MCE's ability to maintain a sufficient network in number and type of primary care practitioners to assure that all covered services will be accessible to members without unreasonable delay.

If utilized, describe the impact telehealth services had in overcoming these barriers. Describe the methods used to monitoring the availability and usage of telehealth services.

#### CHP+ MCO, Medicaid MCO, RAE

telehealth policies or coding updates. COA's provider directory lists providers that provide telehealth services.

In addition, Colorado Access has a Virtual Care Collaboration and Integration (VCCI) program that provides increased access to mental health care for its participating network providers. The VCCI program allows PCMPs to refer members to be seen for short-term treatment over telehealth by VCCI clinicians and psychiatrists. The program also incorporated an eConsult component into its service menu during this time and VCCI staff started training primary care practices on how to use this service. The eConsult component allows PCMPs to directly query a psychiatrist via asynchronous HIPAA-secure email for a rapid response to their psychiatric questions. Colorado Access's VCCI program has continued to expand and evolve its services to meet the increased need for behavioral health care. To meet patients where they are, the program allows its participating primary care providers the option to allow VCCI clinical services to be rendered to their patients over telehealth within the primary care setting or directly into the patients' home or safe space. The program has also expanded its scope to allow Colorado Access care managers to make referrals to VCCI for COA members that are unconnected to behavioral health care. These members receive a technical test and training before the telehealth session is scheduled within their home or safe space.

#### **TERMINATIONS:**

The facilities had terminations: Family Practice of Aurora terminated their PCMP contract due to the one provider, Dr. Chae, retiring. Family Medical Clinic for Health Equity closed their Colfax location and Peak Vista Community Health Center closed its location in Kiowa. The remaining terminations were life events, i.e., retirement, moving out of state, and roster clean-up.

Dominament	Previous	Quarter	Current Quarter	
Requirement	Number	Percent	Number	Percent
Sample		0.0%	0	0.0%
CHP+ MCO, Medicaid MCO, RAE				
Total members	348121	N/A	353693	N/A
Total behavioral health practitioners (i.e., PROVCAT codes beginning with "BV" or "BG")		N/A	7021	N/A

#### Table 2A-Establishing and Maintaining the MCE Network: Behavioral Health Data



Poquiromont	Previous	Quarter	Current Quarter	
Requirement	Number	Percent	Number	Percent
Behavioral health practitioners accepting new members 4		64.55%	3039	43.28%
Behavioral health practitioners offering after-hours appointments	1479	21.00%	578	8.23%
New behavioral health practitioners contracted during the quarter		2.34%	146	2.07%
Behavioral health practitioners that closed or left the MCE's network during the quarter	86	1.22%	111	1.58%

#### Table 2B-Establishing and Maintaining the MCE Network: Substance Use Disorder (SUD) Treatment Facilities

Demuissment	Previous Quarter	Current Quarter	
Requirement	Number	Number	
Sample	0	0	
RAE			
Total SUD treatment facilities offering American Society of Addiction Medicine (ASAM) Level 3.1 services	7	8	
Total beds in SUD treatment facilities offering ASAM Level 3.1 services	130	134	
Total SUD treatment facilities offering ASAM Level 3.3 services	0	0	
Total beds in SUD treatment facilities offering ASAM Level 3.3 services	0	0	
Total SUD treatment facilities offering ASAM Level 3.5 services	7	10	
Total beds in SUD treatment facilities offering ASAM Level 3.5 services	284	435	
Total SUD treatment facilities offering ASAM Level 3.7 services	3	4	
Total beds in SUD treatment facilities offering ASAM Level 3.7 services	53	125	
Total SUD treatment facilities offering ASAM Level 3.2 WM (Withdrawal Management)	6	7	
Total beds in SUD treatment facilities offering ASAM Level 3.2 WM services	212	302	
Total SUD treatment facilities offering ASAM Level 3.7 WM services	3	5	
Total beds in SUD treatment facilities offering ASAM Level 3.7 WM services	51	67	



#### Table 2C-Establishing and Maintaining the MCE Network: Behavioral Health Discussion

Describe any barriers that affect the MCE's ability to maintain a sufficient network in number and type of behavioral health practitioners to assure that all covered services will be accessible to members without unreasonable delay. If your network includes out-of-state practitioners serving members enrolled with the MCE please describe.

If utilized, describe the impact telehealth services had in overcoming these barriers. Describe the methods used to monitoring the availability and usage of telehealth services.

For RAEs, describe any barriers to incorporating the ASAM levels of care for the SUD treatment practitioners, practice sites, and entities. Describe the methods used to monitor the available SUD treatment bed at each ASAM level.

#### CHP+ MCO, Medicaid MCO, RAE

Colorado Access did not experience any barriers to behavioral health during this quarter that would negatively impact its ability to maintain a sufficient network.

COA maintains a state-wide behavioral health network. Both the size and scope of this network ensures that all covered services continue to be accessible to members without unreasonable delay. COA continues to grow this network on a regular basis. In an effort to continually improve the behavioral health network, targeted recruitment efforts are underway that focus on identifying any licensed providers in the state who are not already contracted with COA. In addition to these recruitment efforts, thorough vetting processes are in place to ensure COA adds only high-quality providers to the network.

Data from the reporting period show a decrease in the total Behavioral Health (BH) providers in the COA network; however, this is a result of a re-contracting effort and not a true decrease in providers. As of 4/1/2022, many of the BH providers received rate increases and revised fee schedules. The old fee schedules were terminated in the source system for each provider on 3/31/22, which removed them from the Network Adequacy Report data. As a result, the providers that received the new rates will not show in Q3 but will show once again in the Q4 data.

The actual number of termed providers is 112 and with the addition of 150 new providers, the true total for this quarter is 7,021. Please note that COA does not contract with behavioral health providers based on a particular region, so this number if reflective of additional providers across both COA regions.

During the reporting period, COA:

- increased the number of facilities offering ASAM level 3.1 by one while also increasing the number of treatment beds for 3.1 by four
- increased the number of facilities offering ASAM level 3.5 by three
- increased the number of beds offering ASAM level 3.5 by 151
- the number of SUD treatment beds offering ASAM level 3.7 increased by one while also increasing the number of treatment beds for 3.7 by 72



Describe any barriers that affect the MCE's ability to maintain a sufficient network in number and type of behavioral health practitioners to assure that all covered services will be accessible to members without unreasonable delay. If your network includes out-of-state practitioners serving members enrolled with the MCE please describe.

If utilized, describe the impact telehealth services had in overcoming these barriers. Describe the methods used to monitoring the availability and usage of telehealth services.

For RAEs, describe any barriers to incorporating the ASAM levels of care for the SUD treatment practitioners, practice sites, and entities. Describe the methods used to monitor the available SUD treatment bed at each ASAM level.

#### CHP+ MCO, Medicaid MCO, RAE

- increased the number of facilities offering ASAM level 3.2 WM by one while also increasing the number of treatment beds for level 3.2 WM by 90
- increased the number of beds with ASAM level 3.7 WM services by two.

In addition, the number of SUD treatment beds offering ASAM level 3.7 increased by one while the number of treatment beds for 3.7 increased by 72

Currently, COA (Colorado Access) has six SUD providers in clinical review for additional ASAM levels.

COA continues to invite SUD providers into its network. There are currently 16 contracted providers who offer residential and detox levels of care to Colorado Access members. COA uses a clinical quality review process that providers must pass in order to become contracted as a SUD provider.

Five providers have been requested to remediate clinical quality issues prior to contracting, and one provider submitted an incomplete application (and has been specifically directed to what documentation needs to be provided).

This quarter, Colorado Access continued to utilize two behavioral health practice facilitators to offer application support for providers struggling to meet quality metrics. The practice facilitators are meeting individually with providers who have an application in progress to create or improve administrative practices and procedures, develop new workflows to improve authorization procedures and/or transitions of care, develop and organize training plans and requirements, and develop clinical oversight processes. At this time, COA continues to permit all SUD providers who are validated by the State, but not yet contracted by COA, to render SUD treatment and receive out-of-network rates.

COA is continuing to contract with existing and new SUD providers at all ASAM levels for the network and continues to increase the number of both SUD facilities and beds at all ASAM levels. COA currently has six SUD facilities in its clinical review process that evaluates their clinical readiness to serve Medicaid members. As these providers pass the clinical review process, they will be added to the network.



Describe any barriers that affect the MCE's ability to maintain a sufficient network in number and type of behavioral health practitioners to assure that all covered services will be accessible to members without unreasonable delay. If your network includes out-of-state practitioners serving members enrolled with the MCE please describe.

If utilized, describe the impact telehealth services had in overcoming these barriers. Describe the methods used to monitoring the availability and usage of telehealth services.

For RAEs, describe any barriers to incorporating the ASAM levels of care for the SUD treatment practitioners, practice sites, and entities. Describe the methods used to monitor the available SUD treatment bed at each ASAM level.

#### CHP+ MCO, Medicaid MCO, RAE

Overall, COA's SUD team is growing the program thoughtfully by continuously planning and building the program and screening all SUD providers to ensure quality.

#### TERMINATIONS:

A recovery center in Colorado was terminated for suspected fraud. Center for Change located in Utah, one of the few eating disorder facilities to see Colorado Medicaid members, terminated its contract with COA due to administrative requirements and low reimbursement rates. The remaining terminations were life events, i.e., retirement, moved out of state, and roster clean-up.

Doguiyomont	Previous	Quarter	Current Quarter	
Requirement	Number	Percent	Number	Percent
Sample	0	0.0%	0	0.0%
CHP+ MCO, Medicaid MCO				
Total members		N/A		N/A
Total specialty care practitioners (i.e., PROVCAT codes beginning with "SV" or "SG")		N/A		N/A
Specialty care practitioners accepting new members				
Specialty care practitioners offering after-hours appointments				
New specialty care practitioners contracted during the quarter				
Specialty care practitioners that closed or left the MCE's network during the quarter				

#### Table 3A-Establishing and Maintaining the MCE Network: Specialty Care Data



#### Table 3B-Establishing and Maintaining the MCE Network: Specialty Care Discussion

Describe any barriers that affect the MCE's ability to maintain a sufficient network in number and type of specialty care practitioners to assure that all covered services will be accessible to members without unreasonable delay.

If utilized, describe the impact telehealth services had in overcoming these barriers. Describe the methods used to monitoring the availability and usage of telehealth services.

#### CHP+ MCO, Medicaid MCO

NA to the RAE 3 Report.



3. Network Changes and Deficiencies

### **Network Changes**

<u>Supporting contract reference</u>: The MCE shall report in writing to the Department, all changes in MCE Networks related to quality of care, competence, or professional conduct.

#### Table 4-Network Changes: Discussion

If the MCE experienced a positive or negative change in its network related to quality of care, competence, or professional conduct, describe the change and state whether the MCE notified the Department, in writing, within ten (10) business days of the change.

Note: If the MCE experienced a deficiency in the quarter prior to the measurement period, the MCE's response should include a description of the actions taken by the MCE to address the deficiency.

#### CHP+ MCO, Medicaid MCO, RAE

Colorado Access's quality, compliance and provider engagement departments monitor the network and track providers related to quality of care, competence, and professional conduct. COA has not experienced a change in the network this quarter.

#### Table 5-CHP+ MCO Network Volume Changes and Notification: Discussion

If the MCE experienced at least a five percent (5%) increase or decrease in its network in a thirty (30) calendar day period, describe the change and answer the following questions:

Did the MCE notify the Department, in writing, within ten (10) business days of the change?

Was the change due to a practitioner/practice site/entity's request to withdraw; was the change due to the MCE's activities to obtain or retain NCQA accreditation?

Was the change due to a practitioner/practice site/entity's failure to receive credentialing or recredentialing from the MCE?

#### CHP+ MCO

NA to the RAE 3 Report.



### **Inadequate Network Policies**

<u>Supporting contract reference:</u> If the MCE fails to maintain an adequate network that provides Members with access to PCPs within a county in the MCE's Service Area, the Department may designate that county as a mixed county for the purpose of offering the option of an HMO or the State's self-funded network to eligible Members by providing the MCE a thirty (30) calendar day written notice.

#### Table 6-CHP+ MCO Inadequate Access to PCPs: Discussion

Did the MCE fail to maintain an adequate network that provides members with access to PCPs within a county in the MCE's service area?

If the MCE answered "yes", did the Department designate that county as a mixed county for the purpose of offering the option of an HMO or the State's self-funded network to eligible members?

#### CHP+ MCO

NA to the RAE 3 Report.

#### Table 7-CHP+ MCO Discontinue Services to an Entire County: Discussion

Did the MCE discontinue providing covered services to members within an entire county within the MCE's service area?

If the MCE answered "yes", did the MCE provide no less than sixty (60) calendar days prior written notice to the Department of the MCE's intent to discontinue such services?

#### CHP+ MCO

NA to the RAE 3 Report.

#### Table 8-CHP+ MCO Provider Network Changes: Discussion

Did the MCE experience an unexpected or anticipated material change to the network or a network deficiency that could affect service delivery, availability or capacity within the provider network? If the MCE answered "yes", did the MCE notify the Department, in writing, of the change?

#### CHP+ MCO

NA to the RAE 3 Report.



### 4. Appointment Timeliness Standards

### **Appointment Timeliness Standards**

<u>Supporting contract reference</u>: The MCE shall provide coverage of emergency and non-urgent medical services. The MCE shall have written policies and procedures describing how members can receive coverage of emergency services or urgently needed services while temporarily absent from the MCE's service area.

#### **Table 9-Physical Health Appointment Timeliness Standards**

Describe the method(s) used by the MCE to monitor its contract's timeliness requirements for members' access to physical health services. Describe findings specific to the current reporting period.

#### CHP+ MCO, Medicaid MCO, RAE

As documented in previous Network Adequacy reports, COA has relied on the Secret Shopper program to monitor its contracted providers' compliance with access to care standards. Over the past few quarters, COA has had the opportunity to evaluate the impact of the Secret Shopper program in order to further align this monitoring tool with additional network management efforts. During this review process, COA has observed the unprecedented challenges faced by physical health providers within the current environment. Providers have been vocal about increased issues of staff shortages, high staff turnover, and shortened office hours due to illnesses and burnout.

Considering the pressures on providers, COA is expanding its ability to evaluate and monitor access to care standards. This evolved model is built upon data and outcomes obtained from the Secret Shopper program and, specifically, data trends in practices that were not passing the standards on which they were being tested. It was recognized that rotating staff in the front office significantly contributed to challenges with adhering to the access to care standards. As a result, this new model will consist of a highly engaged and collaborative training program with providers that is targeted at all aspects of access to care requirements, including a specific dedication to training front office staff on Medicaid rules. COA believes that regular and consistent office training is the key to understanding and adhering to Medicaid requirements and will help practices be more successful with completing COA network monitoring programs, such as Secret Shopper.

During the reporting period, COA started its enhanced training program for access to care standards, focusing on specific areas of practice, to ensure all staff understand and adhere to standards. Examples include training on appointment scheduling requirements for front office staff and development of voice mail scripts to ensure appropriate referral messaging. Trainings are conducted in person (virtually, if necessary) and include leave-behind materials. Providers will participate in COA led trainings at least annually and will receive training reminder "tips" quarterly via the Provider Portal and COA's Navigator newsletter. Any practice that experiences turnover in staff key to access to care compliance (front office, office manager etc.) will have training scheduled for all new staff within two



weeks of notification. All training will be available on COA's Learning Management System (LMS) and will be accessible to all providers at any time.

Each practice staff member who sets patient appointments will be required to take the training. Each staff must successfully pass the training before the entire practice is deemed "complete" with the training regimen. Each staff has three attempts to pass the training test. Any staff within a practice who does not get a 100% on the training test by the third attempt will be referred back to their Provider Network manager for additional training and testing. Prior to the second round of training the Practice Facilitator assigned to the provider will be notified. The Practice Facilitator will discuss with the provider, practice owner or office manager that continued training failures will result in a deficient score in the Provider Metric Summary, resulting in lower quarterly incentive payments.

Once a practice has successfully completed the training, they will be referred to the COA Quality Department who will enroll the previously trained practice in the Secret Shopper program. Practices who do not successfully pass the secret shopper call will be referred back to Provider Network Services and will receive an updated training on the missed standards as well as an overview of all access to care standards, within two weeks of notification. These providers may be subject to additional secret shopper calls depending on the area of failure as well as lower Provider Metric Summary incentive payments.

During Q2 and Q3 2022, COA focused on and started the training program with Behavioral Health providers. In Q4, CY2022, COA will start to focus on Primary Care providers.

#### Table 10-Behavioral Health Appointment Timeliness Standards

Describe the method(s) used by the MCE to monitor its contract's timeliness requirements for members' access to behavioral health services. Describe findings specific to the current reporting period.

#### CHP+ MCO, RAE

BH Provider Access to Care Monitoring:

As documented in previous Network Adequacy reports, COA has relied on the Secret Shopper program to monitor its contracted providers' compliance with access to care standards. Over the past few quarters, COA has had the opportunity to evaluate the impact of the Secret Shopper program in order to further align this monitoring tool with additional network management efforts. During this review process, COA has also observed the unprecedented challenges faced by behavioral health providers within the current environment. Providers have been vocal about increased issues of staff shortages, high staff turnover, shortened office hours due to illnesses and burnout.

Considering the pressures on providers, the overwhelming need for behavioral health treatments for members and the State's Wildly Important Goal (WIG) of increasing the behavioral health networks across the state, COA is expanding its ability to evaluate and monitor access to care standards. This evolved model is built upon data and outcomes obtained from the Secret Shopper program and,



specifically, data trends in practices that were not passing the standards on which they were being tested. It was recognized that rotating staff in the front office significantly contributed to challenges with adhering to the access to care standards. As a result, this new model will consist of a highly engaged and collaborative training program with providers that is targeted at all aspects of access to care requirements, including a specific dedication to training front office staff on Medicaid rules. COA believes that regular and consistent office training is the key to understanding and adhering to Medicaid requirements and will help practices be more successful with completing COA network monitoring programs, such as Secret Shopper.

During the reporting period, COA started its enhanced training program for access to care standards, focusing on specific areas of practice, to ensure all staff understand and adhere to access to care standards. Examples include training on appointment scheduling requirements for front office staff and the development of voice mail scripts to ensure appropriate referral messaging. This training is conducted in person (virtually, if necessary) and includes leave-behind materials. Providers will participate in this COA led training at least annually and will receive training reminder "tips" quarterly via the Provider Portal and COA's Navigator newsletter. Any practice that experiences turnover in staff key to access to care compliance (front office, office manager etc.) will have training scheduled for all new staff within two weeks of notification. All training will be available on COA's Learning Management System (LMS) and will be accessible to all providers at any time.

Each practice staff member who sets patient appointments will be required to take the training. Each staff must successfully pass the training before the entire practice is deemed "complete" with the training regimen. Each staff has three attempts to pass the training test. Any staff within a practice who does not get a 100% on the training test by the third attempt will be referred back to their Provider Network manager for additional training and testing. Prior to the second round of training the Practice Facilitator assigned to the provider will be notified. The Practice Facilitator will discuss with the provider, practice owner or office manager that continued training failures will result in a deficient score in the Provider Metric Summary, resulting in lower quarterly incentive payments.

Once a practice has successfully completed the training, they will be referred to COA's Quality department who will enroll the previously trained practice in the Secret Shopper program. Practices who do not successfully pass the secret shopper call will be referred back to the Provider Network Services department and will receive an updated training on the missed standards as well as an overview of all access to care standards within two weeks of notification. These providers may be subject to additional secret shopper calls depending on the area of failure as well as lower Provider Metric Summary incentive payments.

Since implementing this training protocol, the Provider Network Services team has conducted Access to Care Standards training courses with 11 practice sites, which included 29 individual staff trainings. Of the 11 practices, two had at least one staff member who did not pass the training tests. The above-described actions are currently being taken by those who did not pass.

COA is monitoring the areas of failure to identify themes to further enhance training programs.



In addition to the Secret Shopper program, COA's Contracting team provides incentives to community mental health centers (CMHCs) with whom it contracts. This allows CMHCs to fund hiring staff to help with operations and clinical work.

This quarter, COA also increased the behavioral health fee schedule. This has allowed behavioral health (BH) practices to keep their doors open to members needing all levels of care. There has been an uptick in providers wanting to contract due to the rate increase. COA is using this increase in the behavioral health fee schedule to not only attract new BH providers to the network, but to encourage providers to accept more Medicaid members, thus increasing access to BH care services.



### 5. Time and Distance Standards

### Health Care Network Time and Distance Standards

<u>Supporting contract reference</u>: The MCE shall ensure that its network has a sufficient number of practitioners, practice sites, and entities who generate billable services within their zip code or within the maximum distance for their county classification. The MCE must use GeoAccess or a comparable service to measure the travel time and driving distance between where members live and the physical location of the practitioners/practice sites/entities in the MCE's Region.

Enter time and distance compliance results (e.g., "Met" or "Not Met") in the MS Excel template. Use Tables 11, 12, and 13 for additional relevant information regarding the MCE's compliance with time and distance requirements. Geographic regions refer to the areas in which members reside, as members may travel outside their county of residence for care. For physical health time and distance requirements, MCEs are only required to report data for members residing inside the MCE's contracted counties. For statewide behavioral health time and distance requirements, MCEs are required to report results for all members regardless of county residence.

- CHP+ MCO defines "child members" as 0 through the month in which the member turns 19 years of age.
- CHP+ MCO defines "adult members" as those over 19 years of age (beginning the month after the member turned 19 years of age).
- Medicaid MCO and RAE define "child members" as under 21 years of age.
- Medicaid MCOs and RAEs define "adult members" as those 21 years of age or over.

There are two levels of primary care practitioners: primary practitioners that can bill as individuals (e.g., MDs, DOs, NPs, and CNS') and mid-level practitioners that cannot bill as individuals (e.g., PAs); each type of practitioner has its own row in the MS Excel template tabs for time/distance reporting.

A practitioner/practice site/entity should only be counted one time in the MCE's data submission; if a practitioner provides primary care for the Adult-Only or Pediatric network categories (and is not an Obstetrician/Gynecologist), the MCE should count the primary care practitioner one time under the Family Practitioner network category.



Table 11–Urban Health Care Network Time and Distance Standards: Discussion



Present detailed time/distance results for members residing in Colorado's urban counties using the accompanying MS Excel workbook template.

List the specific <u>urban</u> counties in which the MCE does not meet the time/distance requirements. Describe the MCE's approach to ensuring access to care for members residing in <u>urban</u> Colorado counties where the MCE does not meet the time/distance requirements.

CHP+ MCO, Medicaid MCO, RAE

Colorado Access continually monitors its network adequacy, and the Contracting and Provider Network Services departments work closely with the Care Management team to address any areas of concern. When there is a need in the network, COA actively recruits providers in those areas. COA also continues to get requests from new providers wanting to join the network; and if eligible, COA makes every effort to add them to its panel of providers. COA has a committee dedicated to the recruitment and retention of providers.

Currently, the committee is determining the status of all the providers with particular focus on primary care and behavioral health. The Provider Network Services team continues to reach out to providers that have not submitted a claim in the last 18 months to ensure they are still in business, taking Medicaid members, and to discuss what their capacity is to increase their utilization. This information is shared with internal care management, customer service, and utilization management departments to increase referrals to these identified providers.

All physical health provider time and distance standards are met.

For behavioral health, the following time and distance standards are "not met." The percentages listed show the percentage at which they do meet:

SUD facilities with ASAM levels 3.1 = 62%, 3.3, 3.7, 3.7 WM = 0%.

Colorado Access is continuing to contract with existing and new SUD providers at all ASAM levels for the network. COA continues to increase the number of SUD facilities and beds at all ASAM levels. COA currently has six SUD facilities in its clinical review process that evaluates their clinical readiness to serve Health First Colorado members. As these providers pass the clinical review process, they will be added to the network.

The following specialties are "not met" in the specific counties listed. The percentages listed below show the percentage at which they do meet:

Adams: Family Practitioner (MD, DO, CNS), Family Practitioner (PA), Gynecology, OB/GYN (MD, DO, NP, CNS), General SUD Treatment Practitioner, Pediatric SUD Practitioner, General Psychiatrists and other Psychiatric Prescribers = 99%; Gynecology, OB/GYN (PA) and SUD Treatment – ASAM 3.1, 3.5, 3.2 WM = 98%, ASAM 3.3, 3.7 WM = 0%, ASAM 3.7 = 2%;



Psychiatric Hospitals or Psychiatric Units in Acute Care Hospitals = 94.5%; Psychiatric Residential Treatment Facilities = 97%

**Arapahoe:** Family Practitioner (PA), Gynecology, OB/GYN (MD, DO, NP, CNS), Gynecology, OB/GYN (PA), General SUD Treatment Practitioner, Pediatric SUD Practitioner, General Psychiatrists and other Psychiatric Prescribers = 99%; SUD Treatment – ASAM 3.1 = 60%, 3.5, 3.2 WM = 98%; ASAM 3.3, 3.7 3.7 WM = 0%; Psychiatric Hospitals or Psychiatric Units in Acute Care Hospitals = 98.9%; Psychiatric Residential Treatment Facilities = 97%

**Douglas:** Family Practitioner (PA), General SUD Treatment Practitioner, Pediatric SUD Practitioner, General Psychiatrists and other Psychiatric Prescribers = 99%; Gynecology, OB/GYN (PA) = 98%; SUD Treatment – ASAM 3.5 = 98%; 3.2 WM = 47%; ASAM 3.1, 3.3, 3.7 3.7 WM = 0%; Psychiatric Hospitals or Psychiatric Units in Acute Care Hospitals = 98.4%; Psychiatric Residential Treatment Facilities = 56%

**Elbert:** Pediatric Primary Care Practitioner (PA), Adult-only Primary Care Practitioner (PA), Family Practitioner (PA), General SUD Treatment Practitioner, Pediatric SUD Practitioner = 99%; Gynecology, OB/GYN (MD, DO, NP, CNS) = 98%; SUD Treatment – ASAM 3.1 = 78%; 3.5 = 95%; 3.2 WM = 93%, 3.3, 3.7 3.7 WM = 0%; Psychiatric Hospitals or Psychiatric Units in Acute Care Hospitals = 77%; Psychiatric Residential Treatment Facilities = 15%

#### Table 12–Rural Health Care Network Time and Distance Standards: Discussion

Present detailed time/distance results for members residing in Colorado's rural counties using the accompanying MS Excel workbook template.

List the specific <u>rural</u> counties in which the MCE does not meet the time/distance requirements. Describe the MCE's approach to ensuring access to care for members residing in <u>rural</u> Colorado counties where the MCE does not meet the time/distance requirements.

#### CHP+ MCO, Medicaid MCO, RAE

RAE region 3 does not have any rural areas.

#### Table 13–Frontier Health Care Network Time and Distance Standards: Discussion



Present detailed time/distance results for members residing in Colorado's frontier counties using the accompanying MS Excel workbook template.

List the specific <u>frontier</u> counties in which the MCE does not meet the time/distance requirements. Describe the MCE's approach to ensuring access to care for members residing in <u>frontier</u> Colorado counties where the MCE does not meet the time/distance requirements.

CHP+ MCO, Medicaid MCO, RAE

RAE region 3 does not have any frontier areas.



### Appendix A. Single Case Agreements (SCAs)

Individual practitioners with single case agreements (SCAs) are not counted as part of the MCE's health care network and should be excluded from tabulations in the body of this MS Word report and the associated MS Excel report(s). However, the Department acknowledges the role of SCAs in mitigating potential network deficiencies and requests that the MCE use Tables A-1 and A-2 below to list individual practitioners or SUD treatment facilities with SCAs and describe the MCE's use of SCAs.

SCA Practitioners or SUD Treatment Facilities	Medicaid ID	County Name	HCPF Network Category Code(s)	HCPF Network Category Description (include ASAM levels for SUD treatment facilities)	Number of Members Served by SCA
Franklin Q. Smith	0000000	Denver	<i>PV050</i>	Adult Only Primary Care	
Chrysalis Behavioral Health	0000000	Baca	BF085	SUD Treatment Facility, ASAM Levels 3.1 and 3.3	
CHP+ MCO, Medicaid MCO, RAE					
Centennial Peaks Hospital	10886753	Boulder	BV140	Mental Hospital	
Children's Hospital Colorado	9000164954	Adams	BF141	General Hospital with a Psych Unit	

#### Table A-1-Practitioners and SUD Treatment Facilities with SCAs: Data





SCA Practitioners or SUD Treatment Facilities	Medicaid ID	County Name	HCPF Network Category Code(s)	HCPF Network Category Description (include ASAM levels for SUD treatment facilities)	Number of Members Served by SCA

#### Table A-2-Practitioners with SCAs: Discussion

Describe the MCE's approach to expanding access to care for members with the use of SCAs.

Describe the methods used to upgrade practitioners with SCAs to fully contracted network practitioners.

#### CHP+ MCO, Medicaid MCO, RAE

When necessary, COA enters a SCA with a non-participating provider based on requests from its utilization management and/or care management department. Once a SCA is complete, COA reaches out to the provider to ask them if they are interested in joining the network or amending their contract to add the service. If interested, COA follows its usual policy and procedures with respect to the contracting process.



### **Appendix B. Optional MCE Content**

This optional appendix may contain additional information, graphs, or maps that the MCE would like to include in its quarterly report.

### **Instructions for Appendices**

To add an image:

- Go to "Insert" and click on "Pictures".
- Select jpg file and click "Insert".

To add an additional Appendix:

- Go to "Layout" and click on "Breaks".
- Select "Next Page" and a new page will be created.
- Go to "Home" and select "HSAG Heading 6".
- Type "Appendix C." and a descriptive title for the appendix.
- Select the Table of Contents and hit F9 to refresh.

### **Optional MCE Content**

Free text



### **Appendix C. Optional MCE Content**

This optional appendix may contain additional information, graphs, or maps that the MCE would like to include in its quarterly report.