Network Adequacy Quarterly Report Template

Managed Care Entity: *Colorado Access*

Line of Business: *RAE 5*

Contract Number: *19-107517A11*

Contact Name: *Lisa Hug*

Report Submitted by: *Brad Schrom*

Report Submitted on: 1/31/2023

Report due by *01/31/2023*, covering the MCE's network from *10/01/2022 – 12/31/2022*, FY*22-23Q2*

—Final Copy: December 2022 Release—

COLORADO
Department of Health Care
Policy & Financing

Contents

1. Instructions for Using the Network Adequacy Quarterly Report Template

This document contains the December 2022 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, or 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 (December 2022 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 2022-23 Q1	October 2022	September 30, 2022
FY 2022-23 Q2	January 2023	December 31, 2022
FY 2022-23 Q3	April 2023	March 31, 2023
FY 2022-23 Q4	July 2023	June 30, 2023

Definitions

- "MS Word template" refers to the *CO Network Adequacy_Quarterly Report Word Template_F1_1222* document.
- "MS Word MCE Data Requirements" refers to the *CO Network Adequacy_MCE_DataRequirements_F1_1222* 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*)	X	X	
Prenatal Care and Women's Health Services	X	X	X
Primary Care Providers (PCPs)	X	X	X
Physical Health Specialists	X	X	
Behavioral Health Specialists (*RAEs' network categories include Substance Use Disorder [SUD] treatment coverage that went into effect on 1/1/2021*)	X		X
Ancillary Physical Health Services (*Audiology, Optometry, Podiatry, Occupational/Physical/Speech Therapy*)	X	X	

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

Supporting contract reference: 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., December 31, 2022, for the quarterly report due to the Department on January 31, 2023).
- 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., December 31, 2022, for the quarterly report due to the Department on January 31, 2023).
  - 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.

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

Requirement	Previous Quarter		Current Quarter	
	Number	Percent	Number	Percent
Sample	*0*	*0.0%*	*0*	*0.0%*
CHP+ MCO, Medicaid MCO, RAE				
Total members	158794	N/A	163594	N/A
Total primary care practitioners (i.e., PROVCAT codes beginning with "PV" or "PG")	5186	N/A	2603	N/A
Primary care practitioners accepting new members	3585	69.13%	1496	57.47%
Primary care practitioners offering after-hours appointments	1328	25.61%	20	.77%
New primary care practitioners contracted during the quarter	221	4.26%	7	.269%
Primary care practitioners that closed or left the MCE's network during the quarter	50	.96%	0	0

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.
Describe how the MCE ensures members' access to family planning services offered by any appropriate physical health practitioner, practice group, or entity.
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

During the reporting quarter, Colorado Access (COA) implemented a new claims system and data warehouse. Because of this some data points have been impacted. On 11/1/2022, the full conversion to the new claims system was complete. An explanation of the data discrepancies and changes has been included as it relates to COA's internal system changes.

Due to the software conversion, COA shows a decrease in primary care providers in the data only, not in terms of actual providers. Logic is being worked on to be sure all Primary Care Providers (PCPs) and Primary Care Medical Providers (PCMPs) in Region 5 are captured in future data. However, for this quarter, only the PCMPs are showing up in the data for this report. COA should have this fine-tuned by next quarter and anticipates the ability to report retroactively.

This quarter shows a significant decrease in providers offering after-hours appointments because of the logic that was applied in previous quarters to determine those providers. In previous quarters, COA reported on individual providers offering after-hours appointments, but the logic was faulty and was reporting much higher numbers than were accurate. The previous logic was written that any individual provider tied to a facility that offered after hours, were then marked as offering after hours, which may or may not be accurate. COA's new claims system does not capture this information, and COA will no longer report on individual providers.

Due to COA's conversion to a new claims system, all contracts with a start date of 11/1/2022 were excluded from new provider counts. This is because all active contracts existing in the old claims system that were moved to the new claims system were given a start date of 11/1/2022 (11/1/2022 was the go-live date of the new claims system). Therefore, including contracts with a start date of 11/1/2022 would have artificially inflated COA's new contract counts.

Colorado Access monitors its PCMP clinic sites across Region 5 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.

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CHP+ MCO, Medicaid MCO, RAE

Colorado Access did not experience any barriers, during the reporting period, that would negatively impact its ability to maintain a sufficient primary care network. However, issues of workforce retention and burnout continue to be prominent among providers.

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 (PNS) 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 health care providers and front-line staff. COA promotes resources tied to physical and behavioral health support in both the *Provider Update* and *Navigator* newsletters.

From a program standpoint, COA contracted with the Office of Behavioral Health and Wellness at University of Colorado to address and redesign a program around youth vaccinations and vaccine hesitancy. The implementation of this program reduces the burden on providers and front-line staff as it equips them with tools to overcome barriers, they are facing with administering the COVID-19 vaccine. As a leader in this work, COA made this program available to the CCHA (Colorado Community Health Alliance) provider network.

Every contracted Region 5 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 performance dashboards to help providers focus on priorities to help mitigate burnout and increase programmatic success for providers. Dashboards help mitigate burnout as they provide a more efficient way to review data and metrics.

In addition, practice support staff aided providers by maximizing funding potential in the value-based payment program. On a monthly basis, COA staff share with providers the Provider Enhanced Payment Report (PEPR) to focus on engaged members and coordinate the services they need. As a

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CHP+ MCO, Medicaid MCO, RAE

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 and the PNS team 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 reproductive health providers (OB/GYN) in Region 5 to develop a value-based payment model focused on family planning services. The newly developed Reproductive Health Model went live in July 2022. COA believes this will support growth, provider satisfaction, and sustainability within the reproductive health network.

During Q1 State Fiscal Year 2022-2023, 96.39% of the COA Region 5 PCMP network reported data on family planning services and 99.65% of Region 5 members were attributed to these sites. The average rate of family planning services, as reflected on a claim, across the Region 5 PMCP network during Q1 State Fiscal Year 2022-23 was 16.20% with a higher rate of 29.99% observed in the reproductive health provider cohort. Data is reported on a rolling 12-month timeframe and due to claims runout data is reported on a three (3) month lag, which is why we report on the previous quarter in this report.

It is important to note that the network's ability to provide family planning services goes well beyond the number of contracted OB/GYN providers. 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.

Regarding telehealth, COA continues to provide services to improve access. COA educates providers on 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 newsletters which helps educate providers on new telehealth policies or coding updates. COA's provider directory lists providers that offer telehealth services.

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CHP+ MCO, Medicaid MCO, RAE

In addition, the Virtual Care Collaboration and Integration (VCCI) Program at COA continues to provide increased access to behavioral health care for its participating network providers. The VCCI program allows PCMPs (primary care medical providers) to refer members to be seen for short-term/brief intervention treatment over telehealth by VCCI clinicians and psychiatrists either within the primary care setting or directly in the member's home. The VCCI Program includes an eConsult component that allows its participating PCMPs to directly query a VCCI psychiatrist via asynchronous HIPAA-secure email for a rapid response to their psychiatric questions. The program also allows COA care managers to make referrals to VCCI for members that are unconnected to behavioral health care and works with COA care management to coordinate referrals to long-term care and other resources. The VCCI Program continues to expand and evolve its services to meet the increased need for behavioral health care. The VCCI Program incorporated updates to its on-line scheduling provider portal to increase efficiency for patient referrals and the sharing of clinical information through this HIPAA-secure web-based platform. Within this provider portal, scheduling, progress notes, consent forms, and demographic information can be shared to optimize the coordination of member care with VCCI's participating PCMPs

TERMINATIONS:
All terminations were roster clean-ups or life events.

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

Requirement	Previous Quarter		Current Quarter	
	Number	Percent	Number	Percent
Sample	*0*	*0.0%*	*0*	*0.0%*
CHP+ MCO, Medicaid MCO, RAE				
Total members	158794	N/A	163594	N/A
Total behavioral health practitioners (i.e., PROVCAT codes beginning with "BV" or "BG")	6742	N/A	8196	N/A
Behavioral health practitioners accepting new members	4480	66.45%	5318	64.89%
Behavioral health practitioners offering after-hours appointments	1307	19.39%	98	1.19%
New behavioral health practitioners contracted during the quarter	203	3.91%	112	1.37%
Behavioral health practitioners that closed or left the MCE's network during the quarter	101	1.94%	35	.427%

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

Requirement	Previous Quarter	Current Quarter
	Number	Number
Sample	*0*	*0*
RAE		
Total SUD treatment facilities offering American Society of Addiction Medicine (ASAM) Level 3.1 services	10	10
Total SUD treatment facilities offering ASAM Level 3.3 services	0	0
Total SUD treatment facilities offering ASAM Level 3.5 services	11	11
Total SUD treatment facilities offering ASAM Level 3.7 services	4	4
Total SUD treatment facilities offering ASAM Level 3.2 WM (Withdrawal Management)	8	8
Total SUD treatment facilities offering ASAM Level 3.7 WM services	3	3

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

Due to COA implementing a new claims system and data warehouse, some data points have been impacted. On 11/1/2022, the full conversion to the new claims system was complete. An explanation of the data discrepancies and changes has been included as it relates to COA's internal system changes.

This quarter shows a significant decrease in providers offering after-hours appointments because of the logic that was applied in previous quarters to determine those providers. In previous quarters, COA reported on individual providers offering after-hours appointments, but the logic was faulty and was reporting much higher numbers than were accurate. The previous logic was written that any individual provider tied to a facility that offered after hours, were then marked as offering after hours, which may or may not be accurate. COA's new claims system does not capture this information and will no longer report on individual providers.

Due to COA's conversion to a new claims system, all contracts with a start date of 11/1/2022 were excluded from new provider counts. This is because all active contracts existing in the old claims system that were moved to the new claims system were given a start date of 11/1/2022 (11/1/2022 was the go-live date of the new claims system). Therefore, including contracts with a start date of 11/1/2022 would have artificially inflated COA's new contract counts.

In Q2 FY 2022-23, there were 7355 Behavioral Health providers in the Independent Provider Network (IPN). The IPN increased, significantly, from previous quarters. The increase was discovered during implementation of scripting for the new system, when it was found that the original version of the script had incorrect logic. The previous logic was flagging providers affiliated with Community Mental Health Centers (CMHCs) or hospital systems as "Y," which meant they were IPN providers, when they should have been flagged as "N." The providers that should have been included (Y) for IPN providers were omitted (N). The logic has been corrected, so the count for IPN providers is accurate for the reporting period and will be in future reports.

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

ASAM levels

All ASAM levels remained the same for Q2. Currently, there are two additional SUD providers in the contracting process for ASAM level 3.1 and above services.

COA is continuing to contract with existing and new SUD providers at all ASAM levels. Providers must pass a clinical quality review process in order to become contracted as a SUD provider. There are currently 17 contracted providers who offer residential and detox levels of care to COA members.

Barriers

In Q2, COA continued to experience some barriers to behavioral health that could negatively impact its ability to maintain a sufficient network for behavioral health in Denver County. All time and distance standards are met with the exception of SUD facilities with ASAM levels 3.3, 3.7 and 3.7 WM. According to the geoaccess report, 0% of these meet time and distance standards.

Mitigating barriers

COA continues to provide telehealth services to improve access. COA educates providers on 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 newsletters which help educate providers on new telehealth policies or coding updates. COA's provider directory lists providers that offer telehealth services. At this time, COA does not capture telehealth service data. On January 6, 2023, the Network Adequacy Validation workgroup (a monthly meeting with all RAEs present and led by Sandi Wetenkamp with the Department) began discussion about how to capture telehealth data and are working toward integrating the data into the quarterly report.

Attestation Process

Colorado Access participates with the other Regional Accountable Entities (RAEs) to permit unlicensed/pre-licensed clinicians to render services to Health First Colorado (Colorado's Medicaid program) members. The standards identified in the process are intended to safeguard the public while also maintaining the integrity of the health care profession. The greatest priority of the RAEs is maintaining a high clinical standard of care for members. The newly aligned standards will help ensure that unlicensed providers within mental health organizations and integrated care settings are

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>
> **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

receiving appropriate supervision and oversight, with the goal of quality member care that also supports expanding the workforce pipeline. A provider group will complete an initial attestation (with follow-up annually) that underscores adherence to established standards in conjunction with regular audit activities.

Other Support

COA provides coaching support to its behavioral health network. COA continues to utilize two behavioral health practice facilitators to offer application support for providers struggling to meet quality metrics. 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, and not yet contracted with COA, to render SUD treatment and receive out-of-network rates.

COA conducts clinical reviews of all SUD providers seeking to contract with its network. Prospective providers must meet a minimum of 18 Quality measures as a condition of participation. Providers that fall short of any of these measures must attend a remediation meeting with Behavioral Health facilitators to enhance and, if necessary, create new policies, procedures and workflows that adhere to COA standards. When remediation is complete, providers may re-apply. Each ASAM level of care has unique requirements.

TERMINATIONS:

All terminations were roster clean-ups or life events.

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

Requirement	Previous Quarter		Current Quarter	
	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 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
N/A to the Region 5 report.

Network Changes

Supporting contract reference: The MCE shall report in writing to the Department, all changes or deficiencies in MCE Networks related to access to care.

Table 4–Network Changes: Discussion

If the MCE experienced 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, describe the change and state whether the MCE notified the Department, in writing, within five (5) business days of the change.
Note: If the MCE experienced 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 during the quarter prior to the measurement period, the MCE's response should include a description of the actions taken by the MCE during the current measurement period to address the deficiency.
CHP+ MCO, Medicaid MCO, RAE
Internal 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 re-credentialing from the MCE?
CHP+ MCO
N/A to the Region 5 report.

Inadequate Network Policies

Supporting contract reference: 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
N/A to the Region 5 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
N/A to the Region 5 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
N/A to the Region 5 report.

Appointment Timeliness Standards

<u>Supporting contract reference:</u> The MCE shall ensure its network is sufficient so that services are provided to members on a timely basis.

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 observed the unprecedented challenges faced by providers based on the current environment surrounding the pandemic. Providers have been vocal about increased issues of staff shortages, high staff turnover, shortened office hours due to illnesses and provider 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 for 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 program requirements and will help practices be more successful with completing COA network monitoring programs, such as Secret Shopper. In Q2 2022, COA continued its enhanced training program for access to care standards targeting specific areas of practice to ensure all staff understand and adhere to the standards. Examples include training on appointment scheduling requirements developed for front office staff, or voice mail scripts to ensure appropriate referral messaging. This training is conducted in person preferably (virtual if necessary) and includes leave-behind materials. Providers are randomly selected to participate in this COA-led training. 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 member has three attempts to pass the training test. Any staff within a practice who does not score a 100% on the training test by the third attempt will be referred 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 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 to the provider network services (PNS) 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. If practices fail a second round of secret shopper calls, indicating that they are unable to meet access to care timeliness standards and contractual agreements, the quality department identifies an opportunity for quality improvement. The purpose of this opportunity is to offer support, education, and resources to practices for process improvement. This allows practices to develop and implement a practice-specific quality improvement plan that will improve access to care for members. An assigned practice facilitator assists practices with the creation of a quality improvement plan that is completed and approved within approximately 30 days after receiving results and implemented within 60 days after being approved. The intent is to better understand what barriers practices are experiencing and to assist practices in creating an individualized improvement plan with the knowledge of these existing barriers.

As mentioned above, practices are randomly selected to participate in COA led access to care training. The COA quality team will randomly select practices for inclusion in the training. The quality department uses a stratified process to select 50 behavioral health (BH) or physical health (PH) providers and forwards them to the PNS team so the providers can train prior to being secretly shopped. The quality team is responsible for selecting the providers and the PNS will train. During Q2, the PNS team focused on training BH providers only, so they did not train and secret shop PH providers. However, in Q3, PNS will train PH providers and results will be provided in the next report.

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

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 observed the unprecedented challenges faced by behavioral health providers based on the current environment surrounding the pandemic. Providers have been vocal about increased issues of staff shortages, high staff turnover, shortened office hours due to illnesses and provider burnout.

Considering the pressures on BH providers, the overwhelming need for behavioral health treatments for members and the importance 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 for 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 members on Medicaid rules. COA believes that regular and consistent office training is the key to understanding and adhering to program requirements and will help practices be more successful with completing COA network monitoring programs, such as Secret Shopper.

In Q2 2022, COA continued its enhanced training program for Access to Care standards targeting specific areas of practice to ensure all staff understand and adhere to the standards. Examples include training on appointment scheduling requirements developed for front office staff, or voice mail scripts to ensure appropriate referral messaging. This training is conducted in person preferably (virtual if necessary) and includes leave-behind materials. Providers are randomly selected to participate in this COA-led training. 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 score 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 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 (PNS) 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. If practices fail a second round of secret shopper calls, indicating that they are unable to meet Access to Care timeliness standards and contractual agreements, the quality department identifies an opportunity for quality improvement. The purpose of this opportunity is to offer support, education, and resources to practices for process improvement. This allows practices to develop and implement a practice-specific quality improvement plan that will improve access to care for members. An assigned practice facilitator assists practices with the creation of a quality improvement plan that is completed and approved within approximately 30 days after receiving results and implemented within 60 days after being approved. The intent is to better understand what barriers practices are experiencing and to assist practices in creating an individualized improvement plan with the knowledge of these existing barriers.

As mentioned above, practices are randomly selected to participate in COA led Access to Care training. The COA quality team will randomly select practices for inclusion in the training. The quality department uses a stratified process to select 50 behavioral health (BH) providers, and forwards them to the PNS team so the providers can train prior to being secret shopped. The quality team is responsible for selecting the providers and the PNS will train which is highlighted in the grid below.

During Q2 SFY22-23, the PNS team conducted Access to Care training courses on 19 practice sites. Of those practices, one had at least one staff member who did not pass the training tests. The above-described actions are currently being taken with this practice. Overall, COA is consistently monitoring areas of failure to identify themes to enhance its training programs.

In addition to the Secret Shopper program, COA's contracting team provides additional funding to community mental health centers (CMHCs). This supports CMHCs in hiring additional staff to help with operations and clinical work, which results in more access to services.

Access to Care Program Metrics: 2022

Quarter	Practices Trained:	Training Results		Practices Secret Shopped:	Secret Shopper Results
Q2 (October-December)	**SUD providers:** *19 trainings implemented* *29 randomized SUD providers*	*Finalized results will be reported in Q3 update.*		**19 Behavioral health practices undergoing secret shopping. These practices completed Access to Care training in Q1.**	*Results will be available January 31, 2023 and included in the Q3 update.*
		Passed	2		
		Retrained and passed			
		In progress	15		
		Failed	2		
		Declined			

Health Care Network Time and Distance Standards

Supporting contract reference: 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 in its contracted counties, including region-specific contracted counties for RAEs' behavioral health networks. 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 compliance with minimum time and distance requirements for members residing inside the MCE's contracted counties. For statewide behavioral health time and distance requirements, MCEs are required to report compliance with minimum time and distance requirements 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 for each associated network category (PROVCAT code). If a practitioner provides primary care for adult and pediatric members at a specific location, count the practitioner once under the Adult Primary Care Practitioner PROVCAT code, once under the Pediatric Primary Care Practitioner PROVCAT code, and once under the Family Practitioner PROVCAT code. For example, a primary care nurse practitioner (NP) that serves adult and pediatric members can be categorized with the PV063, PV064, and PV065 PROVCAT codes. That practitioner will then be counted for the minimum network standards for pediatric primary care practitioner (NP) (PV064 and PV065); adult primary care practitioner (NP) (PV063 and PV064); and family practitioner (NP) (PV064).

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

CHP+ MCO, Medicaid MCO, RAE

Colorado Access continually monitors its network adequacy, and the contracting and provider network services teams work closely with the care management department 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 hired a Provider Recruitment Program Manager to develop, implement, and direct a data driven strategy to recruit and maintain a provider network of culturally responsive providers based on the needs of Colorado Access members in their communities.

Currently, through a data driven process, the provider recruitment program is determining the status of all the providers with particular focus on primary care and behavioral health. The PNS team continues to outreach providers that have not submitted a claim in the last 18 months to ensure they are still in business and accepting Health First Colorado members, and to discuss what their capacity is for increasing access to appointments. This information is shared with 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. The following network categories are "not met." The ASAM levels are all showing 0% in RAE 5 even though nothing has changed in the number of providers from last quarter. COA is reconfiguring the way in which it captures the ASAM level geoaccess data but was unable to establish the logic in time for Q2 submission. COA will be able to report the accurate percentages next quarter. In Q1, ASAM levels 3.1, 3.5 and 3.2 WM did meet time and distance standards and likely do this quarter as well.
The percentages listed below actually show the percentage at which they do meet:

Network Category	% With Access
SUD Treatment Facilities-ASAM 3.1	0
SUD Treatment Facilities-ASAM 3.2 WM	0

SUD Treatment Facilities-ASAM 3.3	0	
SUD Treatment Facilities-ASAM 3.5	0	
SUD Treatment Facilities-ASAM 3.7	0	
SUD Treatment Facilities-ASAM 3.7 WM	0	

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>contracted rural</u> counties in which the MCE does not meet the time/distance requirements. Each RAE should limit this discussion to counties within its RAE region for both physical and behavioral health time/distance requirements.

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

CHP+ MCO, Medicaid MCO, RAE

Region 5 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>contracted frontier</u> counties in which the MCE does not meet the time/distance requirements. Each RAE should limit this discussion to counties within its RAE region for both physical and behavioral health time/distance requirements.

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

CHP+ MCO, Medicaid MCO, RAE

Region 5 does not have any frontier areas.

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.

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
Franklin Q. Smith	*0000000*	*Denver*	*PV050*	*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					
Children's Hospital Colorado	05002043	Arapahoe	BF141	General Hospital with a Psych Unit	■
Christina Allard	9000169585	El Paso	BV132	Licensed Professional Counselor	■
Lakeland Hospital Acquisition	9000191672	Out of State	BV100R	Residential Treatment Center	■
Tara Jackson	9000144016	La Plata	BV132	Licensed Professional Counselor	■

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 into a single case agreement (SCA) with a non-participating provider based on requests from its utilization management and/or care management department. Once an SCA is complete, COA contacts the provider to ask 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.

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

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