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Definitions

Adherence Audit - The delegation oversight audit conducted by HMO Nurse Liaisons. This audit encompasses all IPA delegated responsibilities as outlined in the Medical Service Agreement (MSA) and HMO Utilization Management and Population Health Management Plan.

American Society of Addiction Medicine (ASAM) - Nationally recognized evidence-based criteria established for substance use disorders.

CAHPS Survey - The Consumer Assessment of Health care Providers and Systems is a survey tool used for monitoring the quality of care in health plans and is utilized in HEDIS reporting. Surveys are designed to capture accurate and reliable information from consumers about their experiences with health care.

Case Management (CM) - Is a collaborative process of assessment, planning, facilitation, care coordination, evaluation and advocacy to meet an individual and family’s comprehensive health needs through communication and available resources to promote quality and cost effective outcomes (CMSA).

Complaint - A complaint is an expression of dissatisfaction, either oral or written. Complaints can be related to but are not limited to the following:
- Claim related issues
- Accessibility/availability of services
- Membership issues
- Group and member billing
- Benefit related issues
- Medical Group/Individual Practice Association or Physician Hospital Organization (hereinafter the “IPAs”), Primary Care Physicians (PCPs), other providers
- Quality of Care, and HMO employees (service related)

Complex Case Management (CCM) - The systematic assessment and coordination of care and services provided to members who are experiencing multiple complex and/or high cost conditions requiring assistance with coordination of multiple services and/or health needs with significant barriers to self-care. The organization coordinates services for its highest risk members with complex conditions and helps them access needed resources.

Condition Management - Program targeted at condition monitoring and education, aimed at improving the Member’s health status and self-management of specific chronic conditions. Focus is on prevention, closing care gaps and healthy lifestyle.

Denial - A denial of services for the requested treatment of a member that does not appear to meet medical necessity criteria and cannot be medically certified based on the information provided by the treating clinician, or the treating clinician’s designated representative.

Grievance - A wrong that is considered as grounds for a complaint or dispute that is related to benefits, policies and/or guidelines.

Illinois Department of Insurance (IDOI) - The Department of Insurance works to ensure all insurance companies, HMOs, producers selling insurance in Illinois and other regulated entities obey state
insurance laws. The Department provides consumer information and investigates complaints about companies and producers.

**Depression Screening** - For purposes of the Condition Population Health Management Program, any evidence-based screening tool may be used. Depression screening should be provided for members who are 12 years of age or older and who do not already have a diagnosis of depression or dysthymia in the past 12 months.

**Health Equity** - When all people have "the opportunity to 'attain their full health potential' and no one is 'disadvantaged from achieving this potential because of their social position or other socially determined circumstance.'" (Source: CDC; Health Equity Institute of San Francisco University)

**HEDIS®** - Healthcare Effectiveness Data & Information Set, an initiative by the National Committee on Quality Assurance to develop, collect, standardize, and report measures of health plan performance.

**HMO - Health Maintenance Organization** - Five (5) health maintenance organizations exist within the managed care structure of Blue Cross and Blue Shield of Illinois (BCBSIL). They are HMO Illinois®, (HMOI), Blue Advantage HMOSM (BA HMO), Blue Precision HMO®SM, BlueCare DirectSM HMO and Blue FocusCare®SM. Except where distinctions are made, the five (5) programs will be referred to as the HMO.

**Initial Assessment (IA)** - Means the documentation of a contact with a member that is completed after determination of the member’s eligibility for Complex Case Management. The assessment is comprehensive and includes, but is not limited to: medical history, social history, mental health status, functional capacity, and caregiver resources. The Initial Assessment must be **initiated** within 30 calendar days of eligibility/identification for Complex Case Management. The initial assessment must be **completed** within 60 calendar days of identification. If a member cannot be reached within 30 days, it must be documented that either the member was hospitalized, **OR** that the member was unable to be reached after (3) three or more attempts within a (2) two-week period within those first 30 days of eligibility/identification.

**IPA** - The overarching terminology utilized in this document which refers to an Individual Practice Association, Independent Physician Association, organized Medical Group, Physician Hospital Organization, or other legal entity organized to arrange for the provision of professional medical services.

**Medical Service Agreement (MSA)** - The “Agreement” between HMO and IPA to facilitate the provision of prepaid health care for members of the HMO.

**National Committee for Quality Assurance (NCQA)** - A private, 501(c)(3) not-for-profit organization dedicated to improving health care quality. Since its founding in 1990, NCQA has been a central figure in driving improvement throughout the health care system, helping to elevate the issue of health care quality to the top of the national agenda ([http://blog.ncqa.org/about-ncqa/](http://blog.ncqa.org/about-ncqa/)).

**Opioid Contract** - An agreement or contract for patients beginning long term treatment with opioids or other controlled substances. The document ensures the patient and their prescribing physician have a clear understanding regarding the treatment plan, use of medications, information related to refilling medications and when treatment may be discontinued.

**Private Duty Nursing (PDN)** - Skilled Nursing Service provided on a one-to-one basis by an actively practicing registered nurse or licensed practical nurse. Private Duty Nursing Service does not include Custodial Care.
Service. Skilled Nursing Service means those services provided by a registered nurse (RN) or licensed practical nurse (LPN) which require the clinical skills and professional training of an RN or LPN and which cannot reasonably be taught to a person who does not have specialized skill and professional training.

**Population Health Management (PHM)** - Programs to address the large-scale social, economic, and environmental issues that impact the health outcomes of groups of people. (David Nash)

**Quality Improvement Committee** – A group of individuals, with qualifications as specified in the HMO Utilization Management and Population Health Management Plan, established by the IPA and responsible for implementing and enforcing the IPA’s quality policies and measures as well as addressing quality concerns. The IPA’s Quality Improvement Committee may also serve as the Utilization Management Committee. If the QI committee also serves as the UM Committee, oversight of both QI and UM functions, as specified in the HMO Utilization Management and Population Health Management Plan, must be evident in all meeting minutes.

**Risk Stratification** - The process of identifying the potential risk or risk status of individuals to assign them to tiers or subsets. Members in specific subsets may be eligible for programs or receive specific services.

**SMART Goals** - Specific, measurable, achievable, results-focused, and time-bound goals.

**Utilization Management (UM) Committee** - A group of individuals with qualifications as specified in the HMO Utilization Management and Population Health Management Plan responsible for implementing and enforcing UM policies as well as providing oversight of delegated IPA components and addressing UM concerns.

**Utilization Management and Population Health Management Plan** - The plan that contains the essential requirements for the establishment and implementation of a utilization management process and population health program to ensure the quality, appropriateness and efficiency of care and resources furnished by the IPA and IPA Providers, and documents all delegated UM and CM functions to entities such as a Contract Management Firms (CMF) or Behavioral Health Vendors, if applicable. The purpose of the Utilization Management and Population Health Management Plan is to ensure that HMO members utilize services appropriately and receive necessary care provided by the Wellness and Prevention, Condition Management, Case Management (CM) and Complex Case Management (CCM) processes.

**Utilization Review Organization** - An entity that conducts utilization review, which includes using formal techniques to monitor and evaluate the medical necessity, appropriateness and efficiency of health care services and procedures.

**Verscend** - Data Analytics Tool made available to IPAs by the HMO, which allows the IPAs to review member utilization patterns and gaps in care.

**Wellness and Prevention Programs** - Refers to the process of supporting members in actively making decisions to achieve optimal physical, mental and social well-being. This includes, but is not limited to education and tracking of preventive health screenings. Closure of ‘care gaps’ is accomplished by outreaching and educating members of the need for preventive and health maintenance services.

-Please reference the Medical Services Agreement (MSA) for additional definitions not found here-
Introduction

HMO Illinois®, Blue Advantage HMO℠, Blue Precision HMO℠ BlueCare Direct HMO℠, and Blue Focus Care HMO℠ (hereinafter the "HMO") of Blue Cross and Blue Shield of Illinois (BCBSIL), a Division of Health Care Service Corporation (HCSC), a Mutual Legal Reserve Company, grants full delegation of the Utilization Management Program (UM) and partial delegation of the Population Health Management Program to duly constituted Medical Groups, Individual Practice Association, or Physician Hospital Organizations (hereinafter the “IPA”).

Through this delegation arrangement, the HMO partners with the IPAs for the establishment and implementation of Utilization Management and Population Health Management processes to ensure the quality, appropriateness, and the efficiency of care and resources furnished by the IPA Providers for BCBSIL HMO members.

IPA physicians are solely responsible for the provision of all health care services to HMO members, and all decisions regarding member treatment and care are the sole responsibility of the IPA physician. Such decisions are not directed or controlled by the HMO. The HMO’s decision about whether any medical service or supply is a covered benefit under the member’s HMO benefit plan are benefit decisions only and are not the provisions of medical care. It is the physician’s responsibility to discuss all treatment options with the member, regardless of whether such treatment is a covered benefit under the member’s benefit plan. The IPA and IPA physicians shall provide services to members in the same manner and quality as those services that are provided to other patients who are not HMO members.

Appointment of a new IPA to the network or appointment of an existing IPA into new HMO products within BCBSIL is contingent upon a number of factors, including IPA adherence to the following HMO Utilization Management and Population Health Management Plan delegation criteria:

a) Valid Utilization Review Organization (URO) License with the state of Illinois;
b) Demonstration of ability to effectively manage utilization within the other HMO products in which it participates;
c) Demonstration of successful implementation of the IPA UM and Population Health Management Plan while striving for improvement in member and practitioner experience, as demonstrated in the HMO PCP and member surveys, with identified areas for improvement addressed by the IPA;
d) Demonstration of satisfactory performance on Quality, UM and Population Health Management Delegation Oversight Adherence and Site Visit Audits;
e) Demonstration of compliance with all other HMO UM requirements;
f) Demonstration of an effective Population Health Management Program;
g) Demonstration of the functional ability and process of the IPA’s to carry out the mandates of the UM and Population Health Management Program; and
h) Demonstrated ability to meet all regulatory and accreditation requirements of the HMO.

HMO Delegation Oversight

The HMO delegates performance of Utilization Management and Population Health Management Plan responsibilities to the IPAs in the HMO network. The Medical Service Agreement (MSA) and HMO UM and Population Health Management Plan delineate the responsibilities of the IPAs, as well as the HMO’s responsibility and mechanisms for oversight. With oversight of the Utilization Management and Population Health Management Plan responsibilities, the objective of the HMO is to monitor the IPA UM decision-making processes and to ensure compliance with the standards as set forth in the 2019 HMO Utilization Management
and Population Health Management Plan. An ongoing assessment of the IPA’s functional capacity to implement the HMO’s Utilization Management and Population Health Management Plan mandates will continually be assessed.

Delegated Utilization Management and Population Health Management Plan responsibilities must be consistently performed within the parameters set forth in the 2019 HMO Medical Services Agreement (MSA) and the 2019 HMO Utilization Management and Population Health Management Plan. Within this structure and its own process capabilities, the IPA has the opportunity to design a Utilization Management and Population Health Management Plan that is suited to its unique practice environment as long as all HMO minimum requirements, as outlined in the HMO Utilization Management and Population Health Management Plan are met.

The HMO delegates Utilization Management and Population Health Management functions, which include the management of Behavioral Health (BH) and Substance Use Disorders (SUD). IPAs may coordinate BH services through the Primary Care Physician (PCP), a BH Practitioner, or sub-delegated BH vendor.

The HMO delegates the selection of nationally recognized clinical criteria to the IPA and specifies procedures for selection, annual review, application, and dissemination of the criteria. Clinical practice guidelines are designed to assist IPA Physicians. The guidelines are not a substitute for the sound medical judgment of the physician. The physician must make the final determination about what treatment or services are appropriate for the member based upon the specific medical condition of the member. The HMO Scope of Benefits, detailed within the HMO Provider Manual, describes the benefits available to HMO member, not the medical appropriateness of the benefit for the individual. Therefore, the HMO Scope of Benefits should only be utilized as a reference for the IPA to develop their policies and procedures for UM decision making. HMO Medical Guidelines (Formerly referred to as the HMO Scope of Benefits) may not be cited in prospective denials and adverse determinations. HMO Medical Guidelines are found within the HMO Provider Manual. A member version of the HMO Medical Guidelines is available to the member, upon request, by calling the HMO Customer Assistance Unit (CAU) at 312-653-6600. (This is similar to when a member occasionally requests a copy of MCG guidelines or Medical Group Guidelines) All proprietary information, such as payment and division of financial responsibility, has been removed from the member version. The member will only receive a copy of the guideline specific to their inquiry. The IPA may NOT share a copy of the HMO Medical Guidelines with the member. Members must be referred to the HMO CAU.

The HMO provides oversight and conducts ongoing review through adherence audits to ensure that delegated processes and procedures are compliant with HMO, regulatory and accreditation standards.

Blue Cross and Blue Shield of Illinois (BCBSIL) monitors the performance of each contracted HMO Individual Practice Association (IPA). An IPA who does not meet the acceptable performance threshold, as determined by BCBSIL is required to submit a Corrective Action Plan (CAP).

Non-compliance with the Utilization Management and Population Health Management Plan requirements will result in corrective action until compliance is achieved. Any failure of the HMO Adherence Audit requires a written Corrective Action Plan (CAP) and immediate remediation of the failing components of the Audit.

The CAP should address all indicators specified in the HMO notification letter. CAP format must include the following components:
The IPA must submit the CAP to BCBSIL by the due date specified in the notification letter. If the CAP is not received by the letter’s due date, then an HMO Administrative Complaint may be issued. IPA submitted CAPs will be reviewed by the BCBSIL staff for completeness and compliance with HMO Requirements. The BCBSIL Nurse Liaison may request follow-up communication related to incomplete and/or insufficient CAP components. An amended CAP must be submitted by the due date specified in this follow-up communication. Amended CAPs not received by the due date will also be subject to an HMO Administrative Complaint.

Once the IPA’s CAP has been approved by the HMO, a letter of acceptance is sent to the IPA by the NL and copied to the HMO Medical Director, HMO Sr. Manager, Network Programs and the HMO Provider Network Consultant. The IPA is required to document approval of their CAP in their UM/QI Committee Meeting Minutes the following month.

A monthly audit will be performed for a period, determined by BCBSIL, after the date of the initial audit, based on the extent of the deficiencies and progress toward remediation.

Non-compliance with the Utilization Management and Population Health Plan requirements may additionally result in the IPAs ineligibility to earn certain incentive payments as outlined in the MSA. The HMO may terminate the delegation agreement with the IPA for non-compliance with the Utilization Management and Population Health Management Plan depending on the severity of the infraction, or continued non-compliance with the Plan.

**Review of Delegated PHM Programs**
The Health Plan will oversee delegated PHM Programs. For contracts in effect for 12 months or longer, the Health Plan will:

a) Annually review the delegated PHM program description;

b) Annually audit CCM files against NCQA standards;

c) Annually evaluates delegate performance against NCQA standards for all delegated activities; and

d) Semi-Annually evaluates reporting.

All new agreements with delegates will require evaluation of the delegate’s capacity to meet HMO, regulatory and accreditation requirements prior to delegation taking place.

**IPA Delegation Requirements and Responsibilities**
Each IPA must have a formal, written Utilization and Population Health Management Plan that meets, at a minimum, all HMO requirements and includes a description of the IPA staff, resources and the process by which the IPA provides Utilization Management and Population Health Management services to its members.
IPA Utilization Management and Population Health Management Plan
The plan must:
  a) Be reviewed and approved annually with approval documented in the IPA UM Committee minutes;
  b) Describe the Behavioral Health (including substance use disorder-SUD) and non-BH aspects of the Utilization Management and Population Health Management Plan;

All IPA PCPs must be notified about how to obtain the IPA Utilization Management and Population Health Management Plan and the process for notification must be stated in the IPA Utilization and Population Health Management Plan.

IPA Sub-Delegation Requirements and Responsibilities
If an IPA chooses to sub-delegate or outsource any Utilization Management and Population Health Management functions to another entity, (e.g. Contract Management Firm (CMF), hospital UM department, BH facility or group), the entity must be named and specific contact information must be documented in their IPA Utilization Management and Population Health Plan.

It is the responsibility of the IPA to review and approve any sub-delegates program components prior to submitting the IPA Utilization/ Population Health Management Plan and the completed Compliance Tool to the HMO Provider Portal by February 15, 2019. Only one (1) IPA UM and Population Health Management Plan and one (1) Compliance Tool which documents all IPA (medical and behavioral health) delegated or non-delegated UM and Population Health Management Plan components will be accepted by the HMO. The HMO Nurse Liaison reviewing the IPA Utilization Management and Population Health Management Plan will notify the IPA of the need for any revisions with an assigned due date for submission of revision(s). Failure to meet the revision due date may result in an HMO administrative complaint, or de-delegation of UM services.

If an IPA changes Contract Management firms, or initiates sub-delegation mid-year, the HMO (both the Nurse Liaison and HMO Provider Network Consultant) must be notified, in writing, at least 30-120 days in advance of the date the new entity will assume the delegation oversight. A pre-delegation evaluation and audit of the prospective delegate must be performed prior to the delegation implementation date to ensure compliance with HMO and IPA requirements. The HMO will request a new Utilization Management and Population Health Management Plan from the IPA and/or sub-delegate. The IPA must submit the new updated Utilization Management and Population Health Management Plan prior to the new delegate implementation date.

Sub-Delegation Agreement Requirements
The IPA Utilization Management and Population Health Management Plan must describe any sub-delegated responsibilities of the Utilization Management and Population Health Management Plan. There must be a contract that defines accountability of the IPA and the sub-delegate, as well as the mechanisms for oversight by the IPA. At minimum, the sub-delegation contract must:
  a) Describe the delegated activities and the respective responsibilities of the IPA and the sub-delegate.
  b) Require at least semi-annual reporting by the sub-delegate to the IPA.
  c) Describe the process by which the organization evaluates the sub-delegate’s performance.
  d) Describe the process for providing member experience and clinical performance data to the sub-delegate when requested.
  e) Describe the remedies available to the IPA if the sub-delegate does not fulfill its obligations, including revocation of the delegation agreement.

The sub-delegated entity is responsible for performing all IPA UM activity for which it is contracted with the
IPA. Sub-delegates must meet the HMO UM standards set forth in the HMO Utilization Management and Population Health Management Plan and be clearly documented within the IPAs Utilization Management and Population Health Management Plan. The IPA is responsible for oversight of any sub-delegates. Mechanisms for oversight must include, but are not limited to:

a) Annual approval of the sub-delegate UM and Population Health Management Plan components;
b) Annual evaluation of sub-delegate performance against HMO and IPA requirements;
c) Review of monthly, quarterly, semi-annual and/or annual submissions and any related reports;
d) Identification of any deficiencies with corrective action;
e) Confirmation of the sub-delegates current, effective Utilization Review Organization (URO) certificate;
f) Annual UM and CCM file review

g) Oversight of the sub-delegates UM/QI Committee activities.

h) Semi-annual Inter-rater reliability testing for all sub-delegated responsibilities (March and September).

Any delegated and/or sub-delegated Contract Management Firm (CMF), Management Service Organization (MSO) or Behavioral Health Organization must also be licensed with the state of Illinois as a Utilization Review Organization (URO). A current URO license must be in effect at all times and evidence of renewals must be submitted in a timely manner to the HMO. Proof of current URO licensure must also be submitted to the HMO Nurse Liaison with the IPA UM and Population Health Management Plan documents on an annual basis.

HMO Structure, Resources and Goals
The HMO is a licensed Utilization Review Organization (URO) in the state of Illinois. The URO license is renewed every two years.

The HMO Utilization Management and Population Health Management Plan is evaluated and revised annually by the HMO UM Workgroup and approved annually by the HMO Quality Improvement Committee.

HMO is contracted with multiple IPAs and fully delegates the functions of the Utilization Management Program. This delegation includes Behavioral Health and Substance Use Disorder management. The delegated Behavioral Health UM Program includes specifics related to triage and referral processes and includes all levels of BH services, as applicable. HMO partially delegates its Population Health Management Programs: Wellness and Prevention, Condition Management (Asthma and Diabetes), Case Management and Complex Case Management. (See Appendix C: HMO and IPA Delegation Responsibility Matrix)

HMO Quality Improvement (QI) Committee
The HMO Quality Improvement (QI) Committee is chaired by a BCBSIL Medical Director. The HMO QI Committee has representation from across the BCBSIL organization. Medical and Behavioral Health Physicians are present at all QI Committee Meetings. The HMO QI Committee is accountable for the oversight of all UM and QI activities managed by the BCBSIL Plan. All Utilization Management and Population Health Management Plan reports are presented to this Committee. The identified Utilization Management trends shape future Quality Improvement activities and interventions. Approval of the HMO Utilization Management and Population Health Management Plan is made by the QI Committee.

HMO UM Workgroup
The HMO Medical Director chairs the HMO UM Workgroup. A BH Medical Director is in attendance along with other members which include the Sr. Manager of Network Programs, UM Nurse Liaisons and HMO Provider Network Consultant(s).
The UM Workgroup’s responsibilities include, but are not limited to, the following:

a) Annual development, review and revision of the HMO UM and -PHM Plan, including revision of annual goals; and consideration of the following:
   i. Analysis of the results of HMO UM and -PHM Program oversight activities;
   ii. Analysis of previous utilization patterns and related cost;
   iii. Provider and member feedback, communication and complaints;
   iv. Changes in regulatory and accreditation requirements.

b) Oversight of HMO UM and -PHM Program policies and procedures to ensure compliance with BCBSIL, Regulatory and Accreditation -Standards;

c) Oversight and monitoring of all UM and Population Health Management functions delegated to the IPAs, which include but are not limited to IPA UM and Population Health Management Plan compliance, IPA UM and Population Health Management Plan Adherence Audit results, UM, Population Health Management and CCM Program case file reviews, IPA submissions and corrective action as applicable;

d) Oversight of IPA monthly complaints and denials;

e) Oversight of the IPA Population Health Management Program requirements with specific reference to the program structure, resources and compliance with HMO requirements;

f) Review of HMO’s Annual Practitioner and Member Satisfaction Survey’s and Quarterly Population Health and CCM Program Surveys;

g) Review of IPA UM data to identify potential over or underutilization patterns;

h) Review and analysis of UM information collected for QI purposes;

i) Reporting HMO UM and -PHM Program trends and outcomes to the QI Committee for review and approval.

HMO 2019 UM and Population Health Management Plan Goals

a) Receive Utilization Management and Population Health Management Plans from all contracted IPAs via the HMO Provider Portal by February 15, 2019;

b) Ensure all IPA UM and Population Health Management Plans meet or exceed the HMO requirements by April 30, 2019;

c) Ensure all IPA UM and Population Health Management Plans meet legislative, regulatory and accreditation requirements;

d) Provide effective educational programs related to perceived and documented needs of the IPAs;

e) Improve member and PCP experience with the referral process;

f) Improve IPA Physicians awareness of the IPA Population Health Management Programs (Wellness and Prevention, Condition Management, Case Management and Complex Case Management);

g) Improve HMO Network Inpatient Utilization; 2019 Targets: Days 252.8 248, Admits 63.2 62, LOS 4.0

h) Evaluate utilization through IPA monitoring of avoidable inpatient days;

i) Ensure compliance with BH triage, including Substance Use Disorder and referral requirements;

j) Improve HMO Network Behavioral Health Utilization; 2019 Targets: Days 29.7 28.22 Admits 4.0, 4.41 LOS 7.3 6.4

k) Introduce HMO Network Substance Use Disorder Utilization; 2019 Targets: Days 9.1 Admits-1.9 LOS-8.3

l) Meet Accreditation Standards (NCQA, URAC) and pertinent federal and state legislative and regulatory requirements (CMS, Illinois Department of Public Health, Illinois Department of Insurance).

HMO Staff

The following staff is employed by the HMO to provide oversight of the delegated UM and Population Health
Management functions performed by the IPA:
   a) Licensed physician(s), including the HMO Medical Director, are directly responsible for oversight of the HMO UM and Population Health Management Plan;
   b) The Executive Director, Clinical Programs Strategy and Oversight is a licensed Registered Nurse providing oversight of all UM and Population Health Management Program functions;
   c) The Sr. Manager of Network Programs is a licensed Registered Nurse, responsible for monitoring the activities of the UM staff, tracking network performance, designing UM interventions, and reporting IPA UM and Population Health Management Program compliance and network activity;
   d) Nurse Liaisons, all of whom are licensed Registered Nurses, are responsible for monitoring each IPA’s Utilization Management and Population Health Management Plan delegated activities and performance.

HMO Monitoring and Oversight of IPA
The HMO Staff will review required IPA submissions monthly, quarterly, semi-annually and annually as outlined in the MSA and the HMO Utilization Management and Population Health Management Plan.
   a) The HMO provides regular feedback to the IPAs with monthly paid claims and quarterly utilization reports. HMO Staff review specific utilization trends including medical, surgical, outpatient surgery, home health, mental health and Substance Use Disorder with IPA Staff. Individual IPA performance is compared to its previous performance and to the performance of other IPAs within the network;
   b) For selected IPAs, the HMO will voluntarily provide educational interventions to assist their progress. These interventions may include comprehensive and detailed UM or Population Health Management in-services, focused educational activities targeted to specific problem areas, document review and/or on-site UM or CM assessment;
   c) The HMO provides an opportunity for discussion of important utilization issues during practitioner conferences. In this forum, best practices are discussed and IPA input is obtained. The HMO may conduct focus groups with the IPAs;
   d) Through selected QI indicators and studies, the HMO monitors the network for issues relating to over-utilization and/or under-utilization of services. This review, discussion and monitoring includes utilization data across practices and practitioner sites. This monitoring information is used to evaluate effectiveness of the processes used to achieve appropriate utilization. Where specific outcomes are relevant to a single IPA, this is communicated to the IPA Medical Director and considered in the re-credentialing and reappointment process;
   e) IPAs are identified for face-to-face visits based on various factors considered by the HMO, including the following: potentially avoidable days, admits/1,000 members, days/1,000 members, average length of stay, Population Health Program performance or any other identified potential issue. In addition, member Survey and PCP Survey data are reviewed annually for each identified IPA;
   f) By contract, the HMO reserves the right to have HMO staff attend the IPA’s UM/QI Committee meetings in order to observe and assess the IPA’s internal processes and activities, and then to provide feedback to the IPA about these processes and activities. The HMO reserves the right to monitor and assess whether the delegated UM activity is performed according to the HMO’s Plan requirements and the MSA, however, such oversight shall not relieve the IPA of its obligations to perform the UM functions in accordance with all applicable HMO policies, procedures, and agreements;
   g) The HMO UM Workgroup reviews reports and identifies potential issues. Also, claims payment data, denial files, customer service issues, quality of care issues, diagnosis, referrals, case detail, assessment of member and Provider experience, and appeals are utilized to identify potential problems. Any
significant substandard performance from the HMO requirements will be reported to HMO management;
h) When deemed appropriate, a corrective action plan will be requested from the IPA. It may include any of the following components: additional data collection, written requests for action, meeting with the network consultant and the IPA, and/or a meeting with the HMO Medical Director and IPA Medical Director and/or Administrator.

Under the supervision of the BCBSIL HMO Medical Director, the HMO Nurse Liaisons provide oversight of UM and Population Health Management Program delegated functions on an ongoing basis. Oversight includes but is not limited to:

a) Annual review and approval of IPA Utilization Management and Population Health Management Plan;
b) Review of random sample of Condition Management, Case Management and Complex Case Management files;
c) Monthly review of Condition Management and Case Management Logs;
d) Monthly review of complaint submissions;
e) Monthly review of All Denials; including Medical Necessity and Non-Covered Benefits
f) Monthly review of referral source IPA submissions;
g) Semi-annual review and random audit to ensure that Daily ER Logs from IPA Affiliated Hospitals are monitored by the IPA;
h) Quarterly review of ALL HMO OON referral logs;
i) Oversight of the Termination of Benefit (TOB) and Exhaustion of Benefit (EOB) processes;
j) Quarterly review of UM statistical reports;
k) Performing IPA UM Adherence Audits.

Adherence Audits
A Nurse Liaison performs an audit of the IPA Utilization Management and Population Health Management Programs and meets with the IPA UM and CM staff, including the IPA Medical Director and/or Physician Champion, as indicated. The Adherence Audit Site Visit Tool is used to measure compliance with the HMO Utilization Management and Population Health Management Plan requirements. The IPA must score at least 90% in order to achieve a passing score.

Any IPA that receives a failing score is required to submit a corrective action plan (CAP) within 30 days of the date on the audit results letter. The corrective action plan must meet minimum guidelines as established by the HMO. The Nurse Liaison monitors receipt of the corrective action plan and reviews it for completeness. The Nurse Liaison will either approve the CAP or request re-submission for areas that do not meet CAP submission requirements. A re-audit is performed to measure compliance with HMO requirements. IPAs that do not meet corrective action requirements or fail the re-audit may be placed in default of the MSA. Should this occur, specific default -provisions of the MSA are enforced.

The following elements will be addressed at the Utilization Management and Population Health Management Plan On-Site Semi-Annual Adherence Audit (conducted either semi-annually or annually at HMO discretion):

a) Case File Reviews (Condition Management, CM, CCM);
b) Review of UM Committee Meeting Minutes;
c) Case File Review including: emergent and concurrent cases for both medical and behavioral health, skilled nursing, home health, long stay, and cases not meeting criteria that have been referred to the Physician Advisor;
d) Interview of the IPA’s UM and Population Health Management Staff to discuss the Population Health Management processes;
e) Discussion of audit results and any pertinent data reflecting the IPA performance.

*Case File scores and resulting audit scores are final and not eligible for appeal once the Nurse Liaison has completed the on-site audit. Please work with the Nurse Liaison to demonstrate compliance prior to completion of the audit. The administrator’s designee from the IPA and the BCBSIL Nurse Liaison will sign a confirmation letter that they are in agreement that all items have been reviewed and discussed.

HMO Utilization Management Program Oversight

Overview
The HMO UM Program is designed to ensure that Medical and Behavioral Health services are medically necessary and appropriate, as well as in conformance with the benefits of the plan and state and regulatory requirements. The Program encompasses services rendered in ambulatory, inpatient and transitional settings. The Program is monitored and evaluated to identify trends and opportunities to improve health care services and member experience. The core components of the HMO UM Program include but are not limited to structure, goals and processes to ensure appropriate utilization, measurement and assessment of member experience.

Ensuring Appropriate Utilization
The HMO reviews and evaluates the following data, and any other information that the HMO deems appropriate in order to identify any patterns of potentially under or over utilization:

- Inpatient admissions/1,000 member;
- Inpatient days/1,000 member;
- Average length of stay (LOS);
- Outpatient surgery/1,000 member;
- ED visits/1,000 member;
- PCED visits/1,000 member;
- Mental health days/1,000 member;
- Substance Use Disorder days/1,000 member;
- Assessment of member and PCP experience with the referral process (Annual survey);
- IPA 30-day re-admission rate (HEDIS methodology);
- Avoidable days; and
- Home Health Utilization.

Data is collected at the network and individual IPA levels. Thresholds for intensified review by the HMO UM Workgroup are established based on a statistical analysis of an IPA’s performance in relation to overall network performance. The HMO UM Program contains utilization goal benchmarks that are set based on all BCBSIL products. In addition, MCG benchmark performance data (for moderately managed health plans) are used as a guide.

The HMO additionally collects a variety of member and practitioner data including, but not limited to, Member and Practitioner experience with the IPA referral process using data collected from the HMO annual member and practitioner satisfaction surveys.
**Appeals**

The HMO does NOT delegate any appeals to the IPA.

The HMO will facilitate the appeal process according to Legislative Requirements (IDOI, CMS) and National Committee of Quality Assurance (NCQA), Utilization Review Accreditation Commission (URAC). The IPA is responsible for explaining all levels of appeal (pre-service, post-service, expedited and external) and the appeal process to the HMO member. IPA instructions and procedures for member initiated appeals with the HMO must be listed within the new member welcome letter.

All levels of appeal may be initiated by either the member, the member’s attorney, the Practitioner(s) acting on behalf of the member, or other member representatives. Retrospective (post-service) member appeals are permitted.

The HMO requires that the IPA provide Practitioner(s) with an appeals process in addition to a member appeals process for all denied services. The IPAs are required to use the HMO denial letter template and required attachments that include instructions about appeal rights. The Appeals attachment is based on the member Plan:

- **Group Policies:** HMOI® (H), Blue Advantage HMO® (B), Blue Precision HMO® (R) and Blue Care Direct HMO® (A)
- **Individual Policies:** All start with the letter “I” Blue Precision HMO, Blue Care Direct HMO, and Blue Focus Care HMO

Please note that the correct Appeals attachment must be used for all denials and termination of benefit letters.

Continued coverage must be provided to the member pending the outcome of an internal appeal for covered services.

The HMO reserves the right to modify or amend the denial and appeals policies or procedures in order to meet any legislative or regulatory requirements, as determined by the HMO.

**Standard Appeals** (Pre-Service and Post-Service)

The IPA denial letter states that the HMO has written policies and procedures regarding appeals that address the following:

- Allowing at least 180 calendar days after receipt of notification of the denial for the members to file an appeal;
- Documentation of the substance of the appeal and action taken;
- Full investigation of the appeal, including aspects of any clinical care involved;
- The opportunity for the member to submit written comments, documents or other information relating to the appeal;
- Appointment of a new person for review of the appeal who was not involved in, or a subordinate to anyone involved in the previous review;
- For medical necessity appeals, the case must be reviewed by a Practitioner of the same or similar specialty as the managing Practitioner;
- The decision and notification to the member or Provider must be made within 15 business days of receipt of the request for standard appeals;
h) There must be notification about further appeal rights including the appeal process and notification of the contact information for the Department of Insurance;
i) There must be procedures for providing the member access and copies of all documents relevant to the appeal, free of charge and upon request;
j) An authorized representative, or attorney must be able to act on the member’s behalf;
k) Procedures for expedited pre-service appeals, which include the initiation, decision and notification process; and
l) Policies for providing notices of the appeals process to member in a culturally and linguistically appropriate manner.

Expedited Appeals
An expedited appeal may be requested if proposed or continued services pertain to a medical condition that may seriously jeopardize the life or health of a member or if the member has received emergency services and remains hospitalized. If the member is hospitalized, the member may continue to receive services with no financial liability until notified of the decision.

The HMO has procedures for registering and responding to expedited appeals which include:
   a) Allowance of oral or written initiation of an expedited appeal by the member, his/her authorized representative, physician, facility, or other health care provider acting on behalf of the member;
   b) Decision and notification to the party filing the appeal and Practitioner as quickly as the medical condition requires, but in no event more than 24 hours after the submission of the appeal, or collection of the information that the HMO requires to evaluate the appeal;
   c) Electronic or written confirmation of the decision must be made within this timeframe;
   d) Notification that expedited external review can occur concurrently with the internal appeals process for urgent care and ongoing treatment.

External Appeals
Requests from the Practitioner(s) and or member for an external appeal should be directed to the HMO Customer Assistance Unit, by calling, (312)-653-6600

New and Existing Medical Technology
Medical Policies represent guidelines for use in making health care benefit coverage determinations on particular clinical issues, including new treatment approaches and medical technologies. HMO evaluates emerging medical technologies as well as new applications of existing technologies through BSBCIL’s corporate medical policy development process. The evaluation process is applied to new technologies, products, drugs, medical and surgical procedures, BH procedures, medical devices and any other such services as may come under policy and claims review. The New and Existing Medical Technology Policy outlines the process for evaluation of technology. IPAs are required to contact the HMO with any questions regarding medical technologies.

Pharmaceutical Management
Pharmacy benefits are administered by Prime Therapeutics, BCBSIL’s Pharmacy Benefit Manager, for member’s having this benefit.
HMO Population Health Management Program Oversight

Overview
The Population Health Management Program seeks to provide a cohesive plan of action for addressing member needs across the continuum of care.

The HMO Population Health Management Program is designed to assist members in navigating the health care continuum from wellness through end of life care. Objectives match those of The Triple Aim: Improving Quality, Improving Member Experience and Decreasing Costs. The programs place the member at the center of the health care system. The programs employ a population health approach striving to accurately identify and stratify members to ensure appropriate interventions for the right patient, in the right setting, at the right time. The HMO Population Health programs include Wellness and Prevention, Condition Management, Case Management and Complex Case Management.

The HMO Population Health Programs are partially delegated to each of its participating IPA’s. The health plan offers assistance in achievement of delegated activities by providing integrated data reporting to the IPA’s on a monthly basis.

The health plan monitors Member Satisfaction with the Population Health and Complex Case Management Programs on a quarterly basis by sending mailed surveys to all members enrolled in the programs. This portion of the Population Health Management Programs is not delegated to the IPA.

Lastly, the HMO monitors the Effectiveness of the Population Health Management and Complex Case Management Programs on an annual basis. Analyses of the effectiveness of these programs shape the structure of the programs in subsequent years. (See Appendix C: HMO and IPA Delegation Responsibility Matrix)

Further references and description of HMO Population Health Management oversight and a description of the collaborative partial-delegation roles and responsibilities shared by the HMO and delegated IPA can be found in the following:
   a) IPA Population Health Management (PHM) Program Structure and Resources (pg. 45)

IPA Utilization Management and Population Health Program Structure and Resources

IPA Physician, UM and Population Health Management Program Staff Requirements
The IPA must clearly identify the staff responsible for specific activities in their Utilization and Population Health Management Plan. The IPA must have a Medical Director, Physician Advisor, Physician Champion, UM Coordinator, Case Manager, Board-certified specialists or consultants, Behavioral Health Medical Director, and UM Committee. A description of the UM staff’s title and professional designation should be detailed in the IPA UM and Population Health Management Plan. For example, the plan should indicate which level of staff are responsible for care coordination, inpatient concurrent review, outpatient authorizations, discharge planning, behavioral health (mental health and substance use disorder), denials, etc.

IPAs must have appropriate staff to perform UM and Case Management functions. A roster of the IPA staff documenting name, title and credentials is required with the annual submission of the UM and Population Health Management Plan. Any change in the IPA staff needs to be reported, in writing, to the HMOs within 30 days of the change.
All physicians practicing and/or participating within an IPA must be currently licensed, without restriction to practice medicine in the state of practice and must be currently credentialed by BCBSIL. The IPA Medical Director, PA and BH Practitioners must be currently licensed in the state in which the IPA operates. Annually, a listing of the IPA Medical Director and all PAs licenses (including license number and expiration dates) must be submitted with the IPA UM and Population Health Management Plan. Copies of licenses are not required. The HMO will verify the physician licenses from a list provided by the IPA. The minimum staffing requirements are as follows:

1. **IPA Medical Director**
   The IPA Medical Director is a board certified, licensed physician who:
   a) Supervises all UM decision-making, including denials
   b) Monitors the implementation of IPA Utilization Management and Population Health Management Plan;
   c) Makes the final decision regarding utilization determinations;
   d) Consults as appropriate with the PCP in utilization decisions;
   e) Oversees the analysis of trends, profiling, and long-term IPA planning;
   f) Oversees all Population Health Management Program activities;
   g) Is responsible for satellite and CMF oversight, if applicable;
   h) Is responsible for the proper functioning of the IPA UM and Quality Improvement Committees.

2. **IPA Behavioral Health Medical Director**
   The IPA Behavioral Health Medical Director is a board certified, licensed Psychiatrist who is responsible for oversight of the Behavioral Health (BH) and Substance Use Disorder (SUD) program as follows:
   a) Supervises all Behavioral Health and SUD UM decision-making, including denials;
   b) Monitors the implementation of IPA UM and Population Health Management Plan;
   c) Makes the final decision regarding BH and SUD utilization determinations;
   d) Consults as appropriate with the PCP in utilization decisions;
   e) Oversees the analysis of trends, profiling, and long-term IPA planning;
   f) Oversees all BH Population Health Program activities;
   g) Is responsible for satellite and CMF oversight, if applicable;
   h) IPA BH Medical Director is responsible for the proper functioning of the IPA UM and Quality Improvement Committees Behavioral Health and SUD activities.

3. **Physician Champion**
   A physician who provides leadership for the IPA’s Population Health Programs: Wellness and Prevention, Condition Management, Case Management and Complex Case Management. The Physician Champion may be the IPA Medical Director, Physician Advisor, or another physician appointee. This role entails hands-on involvement in the workings of the program. The Physician Champion promotes the Population Health Management Programs within the organization by educating peers and discussing the program’s relevance. The Physician Champion must be identified in the IPA UM and Population Health Management Plan. The Physician Champion is required to provide a quarterly update to the IPA UM Committee which includes discussion of ongoing initiatives to support the IPA Population Health Management Programs.

4. **Physician Advisor**
   The Physician Advisor (PA) is the licensed physician most directly involved with individual Utilization
Management case review (i.e. - Preauthorization, Concurrent Review). The IPA Medical Director may act as the Physician Advisor. This physician reviews all cases that do not meet the medical necessity guidelines or are long stay cases (defined as greater than seven days).

5. **Specialist**
   Board-certified specialists, including a BH Practitioner (for mental health and Substance Use Disorder), must be available as needed to assist in making determinations of medical necessity. The IPA must maintain and annually update a list of available board-certified specialists utilized for this purpose. This list of specialists must be submitted to the HMO Nurse Liaison with the annual submission of the UM and Population Health Management Plan. There must be a board-certified psychiatrist or licensed clinical psychologist available as needed for BH UM. In addition, the IPA may utilize a certified addiction medicine specialist for Substance Use Disorder.

   Note: Pediatricians are considered primary care providers. Pediatric Sub-specialists are required to be available, as needed, for pediatric medical necessity determinations.

6. **UM Lead/Supervisor/Manager**
   The UM Supervisor is a health professional who possesses an active, unrestricted IL professional license and supervises UM activities including: day-to-day supervision of UM activities, participates in staff training, monitors for consistent application of UM criteria by UM staff, for each level and type of UM decision, monitors documentation for accuracy and is available to UM staff on-site or by telephone.

7. **UM Nurse**
   The UM Nurse, who is a health professional and possesses an active, unrestricted IL professional license, is responsible for the day-to-day utilization review activities. Utilization case review and application of criteria to approve initial and continued inpatient services must be performed by a licensed professional nurse and supervised by a licensed professional nurse or physician. The HMO will annually verify Professional staff licensure. Registered Nurse license numbers and expiration dates and any other professional licenses must be submitted to the HMO Nurse Liaison with the UM and Population Health Management Plan. The UM Nurse is proficient in the use of medical terminology and nationally recognized medical criteria and is able to communicate accurately with the IPA Medical Director, PA and/or PCPs. There must be sufficient UM Nurse staffing to perform necessary reviews and to discuss cases with the appropriate physician(s). The UM Nurse usually serves as the primary UM contact for the HMO.

8. **UM Coordinator**
   The UM Coordinator, usually a medical assistant or nursing assistant, is a non-licensed staff member responsible for processing pre-service authorization requests and has authority to approve the requests based on use of nationally recognized medical criteria and/or IPA Medical Group guidelines. Any pre-service authorization requests not meeting authorization criteria must be referred to the UM Nurse and/or IPA Medical Director for review and determination.

9. **Case Manager (CM)**
   The Case Manager is an active, unrestricted IL state licensed health professional (RN, NP, PA, MD/DO, LCSW, LCPC, Pharmacist), or other professional approved by the HMO) who may be certified in Case
Management. The Case Manager provides individualized care to members in the CCM, CM and DM Condition Management Programs.

**Job descriptions and Staff Training**

The IPA must have written job descriptions, including practitioner qualifications, for practitioners physicians who review denials. Qualifications should include education, training or professional experience in medical or clinical practice. The job description must include the responsibilities for that position. The job description(s) must be submitted with the annual UM and Population Health Management Plan. A BH Practitioner (which includes mental health and substance use disorder) job description must also be included with the annual UM and Population Health Management Plan.

**IPA Utilization Management Program**

**IPA UM/QI Committee Requirements**

The IPA is required to have a UM and/or QI Committee meeting, with BH and specialist representation, which meets monthly (Pediatricians are not considered specialists for this purpose). The purpose of the IPA UM Committee includes, but is not limited to, the review and approval of the annual IPA Utilization Management and Population Health Management Plan, review of ambulatory and inpatient services, behavioral health services, and Population Health Program services provided to the HMO members. The minutes of the committee meeting must document the following:

a) Date of the meeting;

b) Medical Director/Chairman, BH Medical Director (at minimum quarterly) and members present, including at least one specialist and one BH Practitioner (monthly);

c) Minutes signed by the IPA Medical Director/Chair within five weeks of the date of the last meeting (Meeting Minutes may not be stamped or electronically signed).

The IPA’s QI Committee may also serve as the UM Committee. If the QI committee also serves as the UM Committee, oversight of both QI and UM functions, as specified in the HMO Utilization Management and Population Health Management Plan, must be evident in all meeting minutes. Only one set of meeting minutes will be audited for HMO compliance purposes.

The IPA Utilization Management and Population Health Management Plan must identify the UM Committee chairperson, its membership, the committee structure and meeting schedule. The UM Committee must include broad physician representation, including the following: IPA Medical Director, IPA BH Medical Director, actively practicing primary care physicians, and at least one board-certified specialist. A roster of the Committee members must include each Committee member’s professional degree, license number and specialty, and be submitted with the IPA UM and Population Health Management Plan. Any revisions to the committee membership must be submitted to the HMO within 30 days of change. The UM and Population Health Management Plan must include a description of the process for its development (i.e. which persons or Committees are responsible for the UM and Population Health Management Plan review, revision, and the final approval). A designated BH physician or doctoral-level behavioral health practitioner must be involved in the implementation of the behavioral health aspects of the IPA UM and Population Health Management Plan and is responsible for reporting behavioral health activities to the IPA UM Committee.

The scope of the HMO Utilization Management and Population Health Management Plan includes, but is not limited to, oversight of Utilization Management and Population Health Management Plan requirements, including delegated inpatient and outpatient services as follows:
a) Referrals;
b) Impatient Admissions (Admits/Days/LOS), Transition of Care, Discharge Planning;
c) Diagnostic testing, Therapies;
d) Behavioral Health (BH) which includes mental health and Substance Use Disorder (Acute, PHP, IOP, Residential);
e) Skilled nursing services;
f) Rehabilitation services;
g) Home health care services;
h) Denials;
i) Complaints;
j) Population Health Management Programs: Wellness and Prevention, Condition Management (Asthma and Diabetes), Case Management (CM) and Complex Case Management (CCM) and;
k) Termination of benefits.

IPA UM Targets
The IPA must ensure appropriate utilization through the analysis of past trends. The IPA will develop its own specific goals and set targets including but not limited to:
   a) Inpatient admissions/1,000 member;
   b) Inpatient days/1,000 member;
   c) Average length of stay (LOS);

Complaints/Grievances
The IPA UM Committee must discuss all complaints (Medical, BH and Substance Use Disorder) received by the IPA related to a HMO member or practitioner. Complaint types include, but are not limited to, Potential Quality of Care, Access, Attitude and Service, Billing and Financial issues, Quality of Practitioner Office Sites, or complaints regarding the IPA Complex Case Management Program/Population Health Management Programs.

Grievance - A wrong that is considered as grounds for a complaint or dispute that is related to benefits, policies and/or guidelines.

Complaints and Grievances are not delegated to the IPA. Members are instructed by their certificate of coverage to contact the HMO directly with any Complaints/Grievances. We know that at times, complaints and grievances are received directly by the IPA from a member. If you should receive a complaint or grievance from a member, please implement the following process:
   a) Complaints must be submitted to the HMO Provider Portal with reference to specific complaint categories within one (1) business day of receiving the complaint. Discussion of monthly complaints must be documented in the IPA UM Committee minutes. If there are no complaints for the month, that is to be documented in minutes. The HMO Customer Assistance Unit (CAU) will send the acknowledgement letter to the member within one (1) business day of the complaint submission to the Provider Portal.
   b) The IPA will e-mail or fax the IPA Complaints/Grievances Check List, along with all supporting documentation and Medical Director/Administrator recommendations to the (CAU) within fourteen (14) calendar days. Quarterly review and discussion at the IPA UM Committee meeting of all complaints must be in summary format using categories of complaints (listed above). The report must reflect quarterly and year to date findings, and whether or not any trends have been identified.
c) If all complaints/grievances related documents have not been received by the fifteenth (15th) calendar
day, the CAU may administer an administrative complaint. All complaints must be resolved within 30
days. Resolution of the complaints and the timeframe must be documented on the HMO Provider-
Portal.

d) The final complaint resolution will be determined by BCBSIL. Quarterly review and discussion at the
IPA UM Committee meeting of all complaints must be in summary format using categories of
complaints. The report must reflect quarterly and year to date findings, and whether or not any trends
have been identified.

Inter-rater Reliability
Semi-annually, the UM Committee must review inter-rater reliability results and document its findings in the
UM Committee meeting minutes. All Physicians, Physician Advisors, IPA Medical Directors and UM Staff
(licensed and non-licensed) who are involved in the UM process must be included in this assessment. Inter-
rater reliability testing must be performed by a licensed professional peer of the individual being reviewed.
Every physician and UM staff member involved in UM decision making must be evaluated for inter-rater
reliability compliance.

Inter-Rater Methodology
a) Initially, eight files for each physician and staff member must be reviewed;
b) If each physician and UM staff member passes all eight files, the process is complete;
c) If a physician or staff member does not pass all eight files with 100% accuracy, an additional 22 files
must be reviewed for this staff member(s) for a total of 30 files;
d) Inter Rater Reliability files must be redacted for protected health information (PHI). Both redacted and
unredacted versions of the files are to be uploaded to the HMO Provider Portal semi-annually (March
and September)

Consistency in the Application of Nationally Recognized Medical Criteria Review
If the application of criteria is not consistent across staff, there should be discussion in the UM Committee
meeting minutes regarding the files and any inconsistent application(s) of criteria, along with corrective
action, if applicable.

Inter-Rater Reliability policy and procedures, semi-annual individual staff member/physician results (redacted
and unredacted), semi-annual Committee documentation and Corrective Action Plan (CAP), if indicated, must
be submitted to the HMO semi-annually.

Time Frames Adherence Review
The UM Committee must, on an annual basis, review UM staff adherence to all time frames established for
making UM decisions including urgent and non-urgent pre-service review, initial review, concurrent review,
member complaints, denials post-service reviews, and referral case review. Every UM staff member must be
included in the testing and the results must be documented in the UM Committee meeting minutes, along
with any corrective action if applicable.

UM Timeliness Report
The Timeliness Report applies to all prospective UM determinations, regardless of whether the determinations
result in approval, denial or case closure. Timeliness reports are to be submitted semi-annually to the HMO
Provider Portal (March and September).
UM Timeliness Report Calculation Methodology
The IPA calculates the percentage of decisions that adhere to time frames specified using at least six months of data. At a minimum, the timeliness report calculates rates of adherence to time frames for each category of request: Urgent concurrent, Urgent pre-service, Non-urgent pre-service. Note: Post-service requests are considered claim determinations rather than pre-service determinations).

A separate report must be run for each line of business: Commercial HMO and Retail HMO.

The IPA monitors and submits a report for timeliness of:
   a) Non-behavioral UM decision making;
   b) Notification of non-behavioral UM decisions;
   c) Behavioral UM decision making;
   d) Notification of behavioral UM decisions

Ensuring Appropriate Utilization
The IPAs are required to track and trend utilization data at least semi-annually during the year. Utilization data must be analyzed and discussed as part of the IPA UM Committee meeting, and minutes documenting this discussion are reviewed by the HMO during the on-site review process. The IPAs are required to track specialty referrals in aggregate, BH (mental health and Substance Use Disorder separately) referrals in aggregate and all out-of-network referrals (in detail). In addition, the IPAs are required to track the following, including one for BH: (mental health and Substance Use Disorder separately), inpatient days/1000 member, admits or discharges/1000 member, and average length of stay.

IPAs are required to develop a methodology to identify and track utilization trends for over and underutilization practice patterns and avoidable inpatient days. A policy must be in place to obtain corrective action from IPA Physicians with identified avoidable days. The UM Committee must discuss a 6-month summary of avoidable days, the reason for the delayed discharge and any IPA physician patterns. This must be documented in the minutes semi-annually, with corrective action noted for any physician-identified patterns.

PCP Site Visit Results
There must be annual review and documentation in the UM Committee meeting minutes of the HMO PCP site visit results, as posted on the HMO Provider Portal, with discussion of any non-compliance, including corrective action when indicated.

Assessing Member and Practitioner Experience with the UM and Population Health Management Programs
The HMO mails satisfaction surveys to a statistically significant number of members and practitioners in order to evaluate their experience with the UM process and IPA Complex Case Management and Population Health Management Programs. In addition, CAHPS survey results, member complaints, and appeals data are reviewed to evaluate satisfaction. The IPAs are not delegated to perform their own surveys. The IPAs are required to discuss the HMO survey results annually in the UM Committee meeting, develop interventions, and evaluate the results of the interventions, specific to PCP and member referral experience, along with the PCP’s knowledge of how to obtain the IPA UM and Population Health Management Plan and UM Criteria. In addition, IPAs are required to implement and document in the UM Committee minutes, intervention plans when non-compliant with the following network goals for the member and PCP surveys:
   a) Member referral satisfaction 85% and above;
b) Member satisfaction with the IPA CCM Program 90% and above;  
c) Member satisfaction with the Population Health Programs 90% and above; 
d) PCP referral satisfaction 90% and above;  
e) PCPs knowledge of how to obtain the IPAs UM and Population Health Management Plan must be 75% and above;  
f) PCPs knowledge of how to obtain the IPAs UM criteria must be 75% and above; and 
g) PCPs knowledge of how to refer a member to the IPA CCM Program 75% and above.

IPA UM and Population Health Management Plan: Supporting Documentation Requirements

URO Registration: Illinois Department of Insurance

Utilization Management, including but not limited to prospective, initial, concurrent and retrospective review, referrals, and/or discharge planning, must be performed by a Utilization Review Organization (URO) that is registered, every two years with the Illinois Department of Insurance. The IPA may not delegate URO registration requirements. Any delegated Contract Management Firm (CMF), Management Service Organization (MSO) or Behavioral Health (BH) delegate must also be licensed with the state as a URO. A current URO must be in effect at all times and renewals must be submitted timely to the HMO. Proof of current URO licensure must also be submitted to the HMO Nurse Liaison with the IPA UM and Population Health Management Plan documents on an annual basis.

Policies and Procedures

The IPAs must review and revise all UM and Population Health Management Plan related policies and procedures annually. Policies must include, at a minimum: IPA name, name of policy, effective date, review date, most current revision date, and signature of reviewing and approving authority.

Required Policies Include:

1. **UM staff hospital On-Site Concurrent Review** at facility, (if applicable). If the IPA UM Coordinator performs on-site concurrent review at facilities, the IPA must have a documented process that includes the following elements:
   a) Guidelines for identification of IPA staff at the facility (in accordance with facility policy);
   b) A process for scheduling the on-site review in advance (unless otherwise agreed upon);
   c) A process for ensuring that IPA staff follows facility rules;
   d) If no on-site review is performed, this must be documented in the UM and Population Health Management Plan.

2. **Staff orientation/ training/ performance review** The IPA must have a written policy and procedure for training, orientation, and ongoing performance monitoring of clinical and non-clinical utilization review staff. The policy must be submitted to the HMO Nurse Liaison annually, at the time of submission of the UM and Population Health Management Plan.

3. **Diagnoses, procedures, physicians not requiring pre-certification and/or concurrent review**, if applicable. (Ambulatory, Inpatient)

4. **Additional Clinical Decision-Making Criteria**, clinical pathways, guidelines used for UM decision-making and the process for development and approval, if applicable.

5. **Inter-Rater Reliability (IRR)**- The IPA will have a written policy stating the frequency (semi-annual) of the IRR to be conducted for all staff making UM decisions, the tool being used to audit, the
methodology of audit, and plan of action if results fall below required standards. The results and any plans of action must be discussed in the UM/QI Meeting semi-annually (March and September).

6. **UM Case Closure** due to insufficient information for UM Decision-making. The closure of the case must meet the time frames identified for the type of case being considered.

7. **IPA Referral and Denial Process** - The IPA must have a policy describing their process for approving and denying pre-service and concurrent referral requests. The denial process must describe the distinction and management of both medical necessity versus non-covered benefit denials.

8. **Standing Referrals** - A listing of Referral Diagnoses/procedures/services/physicians that do not require review based on historical UM data. A member diagnosed with a disease or condition requiring an ongoing course of treatment from a specialist or other health care provider may request a standing referral from his/her PCP. This is a single referral, provided at the discretion of the PCP, specifying duration, type and frequency of specialist services to complete an ongoing course of treatment.

9. **Appeals** (not delegated, referred to the HMO Customer Service Department)

10. **Protected Health Information**. The HMO adheres to the Health Insurance Portability and Accountability Act (HIPAA) provisions for the use of Protected Health Information (PHI) and requires the IPA and any sub-delegates, in turn, to follow these provisions. The IPA must:
   a. Use PHI (any member identifiers that can be linked to a member) only to provide or arrange for the provision of medical and BH (which includes mental health and Substance Use Disorder) benefits administration and services;
   b. Provide a description of appropriate safeguards to protect the information from inappropriate use or further disclosure;
   c. Ensure that sub-delegates have similar safeguards;
   d. Provide individual members with access to their PHI;
   e. Inform the HMO if inappropriate uses or disclosures of the PHI occur;
   f. Ensure that PHI is returned, destroyed or protected upon termination of the MSA.

11. **Confidentiality** of all medical information maintained by the IPA or sub-delegated providers is protected from unauthorized use and disclosure.

12. **Tracking avoidable days** for IPA physicians and method for corrective action and non-compliance.

13. **PCP notification to member** of approved certification decisions, if applicable.

14. **Hospital Transition of Care Policy**. IPAs are required to provide a policy that identifies the IPA process of meeting or exceeding the following minimal requirements: Review inpatient logs (and Emergency Department logs, if available) every business day, for potential high-risk transition cases. Contact Hospital Discharge Planner as appropriate. Case Manager bi-directional contact with > 50% of consenting members, who are determined by the IPA to be at high-risk and those who are enrolled in a Condition Management, CM and CCM program, within 2 days of discharge. The transition of care call must include a medication reconciliation assessment.

15. **Transition to Other Care** describing the IPA process for notifying member of an exhausted benefit, transition of care and/or transition of care from Pediatric to Adult Care.


17. **Wellness and Prevention Program Policy** describing the process for IPA Practitioners and Office Staff to educate members regarding preventive health screenings, tracking gaps in care and outreaching to members in order to close gaps in care on an annual basis.

The IPA must provide a document listing all IPA Policies and Procedures, signed by the IPA Medical Director,
attesting that the policies and procedures have been reviewed and approved by the Utilization Management Committee, at minimum, annually (no later than March 31st each calendar year). This list must be submitted with the Utilization Management and Population Health Management Plan following the IPA UM Committee approval and documentation of their approval in the meeting minutes. Only new or revised All required policies and procedures must be submitted with the annual Utilization Management and Population Health Management Plan. documents in addition to the IPA’s Denial and Inter-Rater Reliability policy and procedures.

IPA Utilization Management Requirements

Requirements for HMO Commercial UM Decisions
The IPAs shall meet the following UM decision-making requirements for Medical, Behavioral Health and Substance Use Disorder UM decisions:

- a) UM decisions are made within the time frames established by the HMO using clinical information; (See Appendix B: 2019 UM Timeframes and Requirements)
- b) A process is identified for UM concurrent reviews performed on-site at facilities, such as hospitals and skilled nursing facilities;
- c) Transition of care is provided when benefits end, member is transitioning from Pediatrics to Adult Practitioner, and when a pregnant adolescent is in their transition from pediatrics to an adult PCP, OB/GYN, Family Practitioner or Internist.

UM Criteria for Decision Making
Annually, the IPA UM Committee must review, select, and approve the current version of nationally recognized medical criteria used for medical necessity and LOS determinations and document this in the UM Committee Meeting Minutes. The clinical (medical and BH) criteria must be the current version of the selected nationally recognized criteria. The selection process must include credentialed or licensed actively practicing physicians from at least one specialty in each of the IPA high volume specialty areas.

For Substance Use Disorder, in accordance with Illinois State Law under HB1530 Enrolled Public Act 097-0437 Section 5, the Illinois Insurance Code Section 370c.1 (on page 7, number 3) which states: "Medical necessity determinations for Substance Use Disorders shall be in accordance with appropriate patient placement criteria established by the American Society of Addiction Medicine (ASAM). Every IPA or delegated BH vendor must purchase and be trained in the use of ASAM criteria for Substance Use Disorder management.

IPA staff must use the most current criteria set that encompasses all medical services including, but not limited to, the following:

- a) Medical;
- b) Surgical;
- c) Outpatient surgery;
- d) Behavioral Health which includes mental health and ASAM criteria for Substance Use Disorder;
- e) Rehabilitation;
- f) Home health care (HHC); and
- g) Skilled nursing facility (SNF).

In situations where nationally-recognized criteria are not available, the IPA may utilize additional guidelines created by the IPA, provided that the guidelines are reviewed and approved annually, including any procedures for their use. The development process of the criteria must include appropriate specialists. Every year, the criteria and procedure(s) must be submitted to the HMO Nurse Liaison with the IPA Utilization
Management and Population Health Management Plan. Documentation of review and approval must be in the IPA UM Committee meeting minutes. The IPA may adopt additional objective criteria, clinical pathways, and/or guidelines that must be reviewed by the UM Committee and chosen based on scientific medical evidence. Discussion of how the additional criteria, clinical pathways, and/or guidelines were chosen must be identified in the IPA Utilization Management and Population Health Management Plan as part of the criteria approval process.

**Notification of Availability of Clinical Criteria**

On an annual basis, a written statement must be distributed to all IPA Practitioners notifying them of the availability of the IPA’s nationally recognized criteria and any additional guidelines, the method for requesting the criteria, and the format in which the criteria will be provided. A sample of this annual written statement is to be attached to the annual Utilization Management and Population Health Management Plan for submission to the HMO Nurse Liaison. IPA’s will maintain a log of all requests for criteria. If no requests are made, that must be documented on the log.

IPA cannot reverse an adverse certification decision unless it receives new information not available at the time of the initial determination. An approval decision cannot be reversed.

**Services not Meeting Medical Criteria**

For cases that do not meet the nationally recognized medical criteria or for which criteria are unavailable, the IPA Medical Director and/or PA must make a determination taking into account the individual patient’s circumstances including age, co-morbidities and psychosocial considerations. For all diagnoses and procedures that are not listed in the IPA’s nationally recognized medical criteria set, the case must be reviewed by IPA Medical Director and/or PA for determination of medical necessity. For long stay cases (greater than seven days), the cases must be reviewed weekly by the IPA Medical Director and/or PA for continued medical necessity and appropriateness of setting. The physician review must be documented.

If the requested service (pre-service, initial review, concurrent stay) does not meet nationally recognized medical criteria, the following must also be documented:

- a) Date sent to Physician Advisor;
- b) Documentation of Physician Advisor reason for continued stay approval or denial;
- c) Date additional clinical information requested, date received;
- d) Determination (approval or denial);
- e) Physician Advisor (name);
- f) Member notification and date (IPA policy may include statement that PCP notifies member of approved certification or defines the member notification process); and
- g) Physician Notification and date.

The IPA must provide the number of PA referrals per month in aggregate, and the number of PA referrals resulting in denial in aggregate. This must be reported at the UM Committee meetings.

**Relevant Clinical Information**

To support UM decision-making, the UM Coordinator and/or Physician Advisor must gather and document relevant clinical information including information from the attending physician. The HMO Clinical/Pre-Certification/Pre-Service/Initial Review Form must be utilized, or an equivalent IPA form that includes all required documentation which must be submitted with the UM and Population Health Management Plan.
Relevant clinical information may include, but is not limited to, lab tests, physician’s progress notes, x-ray reports, and individual patient circumstances as listed below:

a) Age;
b) Co-morbidities;
c) Complications;
d) Progress of treatment;
e) Psychosocial situation; and
f) Home environment assessment upon admission, for discharge planning purposes, to include caregiver support and availability.

The UM decision-maker must also consider characteristics of the local delivery system that are available for the specific patient, including:

a) The availability of skilled nursing facilities or home care in the IPA’s service area to support the patient after hospital discharge;
b) The coverage of benefits for skilled nursing facilities or home care when needed; and
c) The ability of local hospital(s) to provide all recommended services within the estimated length of stay.

**Medical Necessity and Benefit Determinations**
The IPA Utilization Management and Population Health Management Plan must describe the process of making medical necessity (including out-of-network) determinations and benefit determinations and the information utilized in making determinations. Non-covered benefit determinations may only be issued when the service requested is never approved for any member, regardless of diagnosis or medical necessity.

**UM Affirmation Statement**
Annually, all IPAs are required to distribute an affirmation statement to all members, Practitioners, Providers and employees who make UM decisions affirming that:

a) UM decisions are based on medical necessity, which includes appropriateness of care and services, and the existence of available benefits;
b) The organization does not specifically reward health plan staff, Providers or other individuals for issuing denials of coverage, care or service; and
c) Incentive programs are not utilized to encourage decisions that result in under-utilization.

A statement regarding conflict of interest must also be included with the affirmation statement.

This statement can be made via the member welcome letter, or member newsletters. Practitioner and employee notification can be made via memos or posted on the IPA internet site. The IPA is required to document the method of how the IPA informs members and practitioners of this requirement and must also submit this with the annual IPA Utilization Management and Population Health Management Plan.

**Access to UM Staff**
The IPA must provide the following communication services for Practitioners and Members:

a) At least eight hours a day, during normal business hours, staff must be available for inbound calls regarding UM issues;
b) UM staff must have the ability to receive inbound after business hours communication regarding UM issues (i.e. voice mail or answering service);
c) There must be outbound communication from staff regarding UM inquiries during normal business hours;

d) Calls must be returned within one business day of receipt of communication;

e) Staff must identify themselves by name, title and organization name when initiating or returning calls;

f) There must be a toll-free number or staff that accepts collect calls regarding UM issues;

g) Callers must have access to UM staff for questions;

h) The IPA offers access to TDD (telecommunications device for the deaf)/TTY (telephone typewriter, or teletypewriter) services to deaf, hard of hearing or speech impaired member. The IPA provides a separate phone number for receiving TDD/TTY messages or uses the State/711 Relay Services; and

i) The IPA offers language assistance for member to discuss UM issues (during office hours).

The IPA must document their inbound and outbound communication process in the annual Utilization Management and Population Health Management Plan. The method for receiving after hours communication must be included. Practitioners and members must be notified of their access to UM staff for questions and the acceptance of collect calls or the availability of a toll-free number. Practitioners and members may be notified via the member welcome letter, newsletter, or memo posted in the PCP office.

**Prospective/Pre-Certification/Pre-Service Process**

Prospective, Pre-Certification, Pre-Service Processes include determination of medical necessity and appropriateness of service and site for inpatient and outpatient services. It is performed by the Utilization Review (UR) Coordinator and/or the PA using the nationally recognized medical criteria selected by the IPA. IPAs may develop written policy and procedures related to services not requiring pre-certification. The policy may include diagnoses, procedures, and/or physicians that do not require prior authorization and/or concurrent review. A member non-discrimination notice should be provided with all medical group approvals and denials pursuant to Section 1557 of the Affordable Care Act. The notice is available on the HMO Provider Portal. This member notice is subject to change is the sole discretion of BCBSIL. In the event of a change to the notice, medical groups can expect BCBSIL to provide an updated notice for use.

**Pre-Certification and Pre-Service includes documentation of the following:**

a) Sources of relevant clinical information utilized (medical record, physician information, labs/test results/x-rays, other);

b) Estimated length of stay (LOS) for inpatient admission;

c) Medical criteria met including criteria code for inpatient admission;

d) Non-urgent pre-service determination (approval or denial) within five calendar days of receipt of request, including the collection of all necessary information (no additional time is allowed for obtaining information);

e) Non-urgent pre-service member notification within five calendar days of the receipt of request;

f) Non-urgent pre-service Practitioner notification within five calendar days of the receipt of request;

g) Urgent pre-service determination (approval and denial) within 72 hours of receipt of request, including the collection of all necessary information (no additional time is allowed for obtaining information);

h) For urgent cases, member notification within 72 hours of receipt of request (IPA policy must state the process for member notification); and

i) For urgent cases, Practitioner notification within 72 hours of receipt of request.

**Initial Review: Emergent/Urgent Certification**

Certification and Initial Review Process for emergent/urgent admissions is to be completed within 24 hours of
admission or notification of admission and includes documentation of the following:

a) UM decision (approval or denial) made within 24 hours of receipt of the request;

b) Nationally recognized medical criteria being met (code documented) in justification of medical necessity issues;

c) Assigned length of stay (LOS);

d) Notification of member within 24 hours of receipt of request (IPA policy must state the process for member notification);

e) Notification of Practitioner(s) within 24 hours of the receipt of request;

f) Discharge planning needs to be documented within 24-48 hours of admission; and

g) Home, family, environmental assessment within 24 hours prior to discharge.

For Practitioner notification, if initial notification is made by telephone, IPA must record time and date of call, and document name of IPA employee who made the call.

For all denials, confirmation of the decision must be provided by mail, fax, or e-mail to both the admitting provider and the member.

**Initial Review-Non-Urgent Precertification**

Initial Review for pre-certified / pre-service non-urgent (elective) admissions may be deferred until assigned length of stay for that approved admission has reached its limit.

The completed certification form for admissions (excluding those identified by the IPA as not requiring review) must include the following:

a) Name of patient and patient identifier;

b) Date of review, Admit Date;

c) Name of Physician – PCP (or admitting physician) and/or Specialists;

d) Diagnosis and Procedure – date of procedure;

e) Facility /Agency Name;

f) Relevant clinical Information – supporting the admission and clinical information source;

g) Medical Criteria (nationally recognized) met and Code;

h) Anticipated Length of Stay (LOS);

i) Physician Notification Date;

j) Member Notification Date;

k) Social, family, caregiver support and home assessment for discharge planning;

l) Potential Discharge Plan, discharge needs, identification of any barriers (e.g. has no family support, is unable to pay for prescription drugs, discharged to home, but is unable to ambulate and lives on the 2nd floor); and

m) Case Management Referral, if applicable.

Admissions must be included on the admission log with the patient name, facility, date of admit, diagnosis/procedures performed, PCP or admitting physician and discharge date. The same log may be used for all admissions (including Hospital, Skilled Nursing Facility, Home Health Care, and Rehabilitation Facility). A sample admission log must be submitted if the HMO form is not used by the IPA.

**Concurrent Review**

Concurrent Review Process is the established process that provides for review of all continued stay situations
(excluding those identified by the IPA as not requiring review) and includes the following documentation:

a) UM decision (approval or denial) made within 24 hours of receipt of request;
b) Sources of relevant clinical information utilized (medical record, physician information, labs/test results/x-rays, other);
c) Nationally recognized medical criteria being met (code documented);
d) Additional criteria used in decision-making;
e) Additional assigned length of stay that is consistent with criteria;
f) Notification of member and Practitioner(s) within 24-hour time frame (If the IPA states in their UM and Population Health Management Plan that the Practitioner assumes approval of continued stay, then the Practitioner does not need to be notified of continued stay approval.);
g) Discharge planning needs to be documented within 24-48 hours of admission and confirmed at discharge;
h) Case review on the 7th day after admission (for patients remaining admitted) to determine need for continued stay or change in discharge plan. If the 7th day occurs on a weekend, the concurrent review is required to be performed on the Friday preceding the weekend; and

i) All reviews for members who remain in an OON hospital for greater than two (2) midnights must be reviewed with the IPA Medical Director to discuss if transfer back in-network should be initiated or continued stay is required.

For cases not requiring review as documented in the IPA’s policies, after the assigned length of stay is determined and a discharge date is determined, the IPA must check for discharge on the designated discharge date. If the member has not been discharged and the case reaches the seventh day, concurrent review must begin with brief documentation of the events since admission. The case should be referred to the PA for a long stay review. Each additional 7 day period that a member remains inpatient requires additional Medical Director review. An initial review form does not need to be completed.

For concurrent review of BH (which includes mental health and Substance Use Disorder) services, the IPA makes decisions regarding: inpatient program, partial hospitalization program, intensive outpatient program, and residential behavioral care program within 24 hours of the receipt of the request.

**Discharge Planning**

A UM Coordinator or Case Manager at the IPA is responsible for assisting with identifying the member needs and implementing a discharge plan.

Each IPA must have written guidelines or protocols showing effective and timely discharge planning/Case Management with documentation as part of the concurrent review process, which include the following:

a) Assessment of member’s needs including cultural preferences and social determinants of health (housing, housing security, access to food markets, exposure to crime/violence, discrimination, access to media, social support, access to transportation and/or financial barriers);
b) Development of discharge treatment plan; and
c) Documentation of SNF transfer, HHC service and treatment plan.

Potential discharge needs should be evaluated on admission and continuously as part of the concurrent review process.

For Mental Health follow-up, the date of appointment with a specific psychiatric practitioner/provider is to be
scheduled prior to discharge and documented on the discharge instruction sheet. All appointments must be scheduled within seven (7) days of discharge, or documentation must state why the seven (7) day follow-up appointment was not made. It is encouraged, but not required, that a member in treatment for Substance Use Disorder also set a date for a follow up visit within seven (7) days of discharge with a BH Practitioner.

**IPA Referral Process**

Initiation of the Referral Process requires a written request for all services (as required by the IPA).

The HMO requires the member and Practitioner(s) be notified of the referral decision, within five calendar days of receipt of the request, (including time necessary for any requests for additional information). If the referral is denied, the member and Practitioner(s) must be notified in writing or electronically within the five calendar days.

**Required Elements in the Referral**

All written referrals must include the following elements:

a) Documentation of the date received by IPA;

b) Documentation of the member name and patient identifier;

c) Documentation of the reason for referral;

d) Documentation of the number of visits or extent of treatment;

e) Referral form must be signed and dated by PCP/PCP office; and

f) Referral must include a statement that referral does not authorize benefits for non-covered services.

**Additional Referral Requirements:**

a) Maintenance of a Referral Inquiry Log by the IPA;

b) Providing the member with a copy of the referral (the IPA or PCP must mail or fax copy to member, if requested by the member);

c) Documentation of communication with PCP if referral is denied (including member requested referrals). It must be documented that the PCP agrees with the denial decision. If the PCP does not agree with the denial, a denial cannot be issued. A written denial letter is not required if the member does NOT receive a written referral;

d) The number of inpatient referrals to the Physician Advisor or IPA Medical Director and the number resulting in denial, must be documented in the UM Committee meeting minutes on a monthly basis; and

e) The UM Committee must discuss referral trends and interventions, if indicated, semi-annually and documented in the minutes. Referral data must be tracked and trended by specialty (including BH), with a two-quarter comparison for six months of data. This must be documented in the UM Committee minutes semi-annually.

Referrals, including but not limited to, therapies, physical therapy, diagnostics, durable medical equipment (DME), and specialists, must be monitored by the IPA for quality of care, appropriate utilization, and compliance with UM decision-making timeframes.

**Referral Inquiry Logs:**

On a quarterly basis, IPA will report the number of out of network referrals received for all Commercial and Retail HMO members. Detail must include the number of referrals approved and the number denied; which must be documented on a log and uploaded to the HMO Provider Portal by the 10th day following the end of
the quarter. Out of network referrals are defined as follows:

a) For HMO risk services (Home Health, DME, etc.)- Any requests for services/vendors not listed on the HMO approved list of in-network vendors;

b) For IPA risk services (Tertiary Providers, Specialists, Physical Therapy, Lab, etc.)- Any requests for services/providers not considered par, in-network for the IPA. Please note: par/preferred tertiary providers should not be considered out-of-network.

Standing Referrals
Member diagnosed with a disease or condition requiring an ongoing course of treatment from a specialist or other health care provider may request a standing referral from his/her PCP. This is a single referral, provided at the discretion of the PCP, specifying duration, type and frequency of specialist services to complete an ongoing course of treatment. The IPA must provide the HMO with a written policy and procedure addressing processes related to standing referrals. The standing referral should be updated at least once per year to review continued eligibility and benefit plan updates.

IPA Denial Process for Medical and BH Services
The IPA must have a plan that describes the method for processing all IPA denials (including medical necessity and benefit denials). This process applies to all services included in the Utilization Management and Population Health Management Plan and must meet the following requirements:

a) All cases that do not meet nationally recognized medical criteria must be reviewed by the IPA Medical Director and/or PA with the decision rendered and documented within the appropriate UM time frame (non-urgent pre-service – within five calendar days of the receipt of request, urgent pre- service – within 72 hours of the receipt of request, and concurrent – within 24 hours of the receipt of request). The IPA Medical Director or PA must determine whether the care should be approved or denied in medical necessity, non-BH care situations. This denial decision can be made only with agreement from the member’s PCP, following bi-directional discussion with the IPA Medical Director;

b) A psychiatrist, doctoral level clinical psychologist, or certified addiction medicine specialist must be responsible for denial of BH (which includes mental health and Substance Use Disorder) care that is based on lack of medical necessity. Please note: A psychiatrist or psychologist may deny both mental health and Substance Use Disorder cases. However, if the Addictions Specialist is not a psychiatrist or psychologist they cannot deny mental health cases but may deny Substance Use Disorder cases; and

c) The IPA must use the most recent HMO approved denial letter, which includes the reason for the denial based on specific guideline source, specific benefit provisions within the guideline and reference to the member’s condition. Clinical information (in addition to the diagnosis) utilized in order to make the denial decision must be included in the denial file. Communication with the PCP regarding the decision must be documented (including member requested referrals). It must be documented that the PCP agrees with the denial decision. An alternative to the denied service must be provided to the member. The written denial notification must include an explanation of the HMO’s appeal process in the body of the denial letter, including the member’s right to attorney representation and must include the correct Appeals Attachment based on the member’s Group number:

i. Group policies: HMO Illinois (H), Blue Advantage HMO (B), Blue Precision® HMO I (R), Blue Care Direct (A)

ii. Individual policies: All start with the letter “I” (Blue Precision HMO, Blue Care Direct and Blue Focus Care)

d) For all denied cases, including concurrent review, Practitioner(s) and member must be informed of the expedited appeals process and this must be noted by the IPA staff member making the call if the initial
notification was made by telephone. The member and Practitioner(s) must be sent confirmation by mail, fax, or e-mail of the original notification within the appropriate time frame with inclusion of information on the expedited appeal process. For urgent pre-service or urgent concurrent denials, the member must be informed that an expedited external review can occur concurrently with the internal appeal process for urgent care and ongoing treatment. All appeals must be forwarded to the HMO Customer Service Department upon appeal request;

e) If more clinical information is requested in order to make a referral determination, document the date information was requested and received. If the additional information will not be received within the required 5-day timeframe, the denial file review case should be closed awaiting this information. Denial decision must be agreeable to the PCP with agreement documented in the denial file. For BH denials, the title/specialty of the BH Practitioner making the decision must be included with the signature. In addition, all Denial letters sent to the member require IPA Medical Director signature;

f) The IPA Medical Director must be available by telephone for the Practitioner(s) to discuss denial decisions for both BH (which includes mental health and Substance Use Disorder) and non-BH denials. The IPA must notify Practitioners of its policy for making a reviewer available to discuss any UM denial decisions in a newsletter, direct mailing, or Provider orientation;

g) The IPA should not send a denial letter for Not Group Approved Services to the member where the IPA received notification after the service had already been provided. Claims received for services previously rendered that are Not Group Approved should be forwarded to the HMO claims department for claims review;

h) The IPA UM Committee must review and discuss denials to insure denials have been appropriately managed according to IPA’s established procedures and HMO policies and this must be documented in the Committee minutes monthly;

i) Denial discussion must include a summary of the category of denial;

j) For BH: document mental health and Substance Use Disorder separately;

k) For non-BH: medical necessity, out-of-network, and benefit, number in each category, timeframe compliance and resolution, number of PA referrals and number resulting in a denial; and

l) A member non-discrimination notice should be provided with all medical group approvals and denials pursuant to Section 1557 of the Affordable Care Act. The notice is available on the HMO Provider Portal. This member notice is subject to change. In the event of a change HMO shall notify the IPA’s.

Monthly Denial File Audit
Denial logs and denial files (medical and BH), including Benefit Denials, are reviewed monthly after submission to the HMO. Denial logs and files must be submitted to the HMO Provider Portal by the 10th of each month (or the next business day if the date falls on a weekend). If the IPA does not have any denials for the month, this must be noted and submitted on a log.

Quarterly Denial File Audit
The HMO audits the IPAs denial files monthly and reports any deficiencies to the IPA. A Quarterly denial file audit findings letter is sent to the IPA Medical Director detailing the results of the audit. The IPA must discuss the findings and document the findings in the UM Committee Meeting minutes, including any corrective action plans, if applicable. If the IPA fails the quarterly denial file review, the IPA is required to submit a written corrective action plan. This corrective action must include a detailed description of how the IPA will correct the identified deficiencies in the denial process. The corrective action plan (CAP) must be received within 15 days from the date of the quarterly denial file results letter. The UM portion of the QI Fund will be impacted by failure of the quarterly denial file review, if the IPA does not meet or exceed an average 90%
overall compliance by the end of the year (Q1-Q4).

IPA Behavioral Health Requirements

The HMO delegates Behavioral Health care to the IPAs. IPAs must describe their member process for obtaining BH (which includes mental health and Substance Use Disorder) services, including written standards for ensuring appropriate BH triage and referral decisions. IPAs may coordinate BH services through the PCP, a BH Practitioner, or the IPA may sub-delegate BH to a specialist vendor. Any Delegation of BH must be described in the IPA Utilization Management and Population Health Management Plan. Triage and referral standards are only applicable when an IPA sub-delegates BH to a Contract Management Firm (CMF, vendor or BH specialty group) who provides centralized triage and referral services.

Any IPA that delegates BH must also ensure that these standards are followed in the delegate’s processes. They must include the following:

a) Triage and referral protocols address the level of urgency and the appropriate setting;
b) Triage and referral protocols are based on sound clinical evidence and currently accepted practices, and are reviewed or revised annually;
c) Triage and referral decisions that require clinical judgement are made by licensed BH Practitioners with appropriate experience;
d) Triage and referral staff are supervised by a licensed BH practitioner with a minimum of a master’s degree and five years of post-master’s clinical experience; and
e) Triage and referral decisions are overseen by a licensed psychiatrist or an appropriately licensed doctoral-level clinical psychologist. In addition, a certified addiction medicine specialist may oversee decisions related to Substance Use Disorder.

In addition, the following are requirements for triage and referral when BH services are delegated:

a) Telephone answered by a non-recorded voice within 30 seconds;
b) Abandonment rate (the percentage of phone calls where member disconnected before the call was answered) less than 5%.

IPAs (with delegated triage) who do not consistently meet the BH triage and referral requirements will be required to submit a corrective action plan (CAP) to the HMO.

All IPA BH services must be provided in accordance with the following access standards with documentation, including written notification of the process, for meeting those standards in the UM and Population Health Management Plan:

a) Access to care for non-life-threatening emergency within 6 hours;
b) Access to urgent care within 24 hours; and
c) Access to an appointment for a routine office visit within 10 business days or two weeks, whichever is less.

Any delegated BH Organization or IPA providing BH services with a centralized triage and referral process, must submit telephone reports quarterly to the HMO QI Department. The reports must include the average speed of answer and the call abandonment rate. BH calls include mental health and/or Substance Use Disorder related calls. Combined mental health and Substance Use Disorder telephone stats are acceptable.

Quarterly review and discussion of any sub-delegate, CMF, or BH delegate including review of any
submissions, or reports from the sub-delegates, if applicable, must be documented and approved in the IPA UM Committee Meeting minutes. CMF quarterly reporting must include reference to telephone statistics and compliance with HMO standards.

**Termination of Benefits (TOB)**

An IPA may not terminate inpatient benefits of any type without the concurrent authorization of the HMO. This applies to medical as well as BH (mental health and Substance Use Disorder) admissions.

There are two (2) types of TOBs:

1. Termination of Benefits for Services at a Group Approved Facility that are NOT Medically Necessary; and
2. Services at a Non-Group Approved Facility, where the PCP has recommended transfer in-network but the member refuses.

When an IPA PCP is notified of a member’s admission to a group-approved facility or to a non-group approved facility, the PCP must contact the attending physician within one business day of the notification of the admission to determine medical necessity. Once the IPA (PCP, Specialist, IPA UM Coordinator, IPA Medical Director or anyone else affiliated with the IPA) is notified of the admission, it is the responsibility of the IPA to manage and oversee the care of the member. If after discussion with the attending physician, the PCP determined that services no longer meet medically necessary guidelines at the group approved facility, and the member refuses to discharge, or if the member refuses to transfer from the out of network facility to an in-network facility despite being stable to transfer, the TOB process is initiated:

a) The PCP communicates the member’s discharge needs or refusal to transfer to the IPA UM Coordinator and/or IPA Medical Director. A written statement from the PCP must indicate that the PCP discussed member’s care with the attending and continued services for the member are no longer medically necessary or that the member is stable for transfer. The statement must include the alternative plan of treatment recommended by the PCP;

b) The IPA notifies the NL of a pending TOB and submits a Termination of Benefits (TOB) letter with appropriate appeals attachment and non-discrimination notice prior to acting on the TOB;

c) The PCP written statement must include signature, diagnosis, clinical summary and patient’s current medical condition/status, including recommendation(s) for transfer or discharge and Recommendation alternatives;

d) The BCBSIL HMO Medical Director will review the submitted documentation to provide an approval for the IPA to issue the TOB Letter to the member;

e) The member must receive written notification from the IPA stating that the PCP has determined that continued services are no longer medically necessary or that the patient is stable to transfer in network and services are therefore not group approved after a stated date. This date must reflect that the member may remain inpatient for a period no greater than 24-hour following the member’s receipt of the determination;

f) The IPA submits a copy of the letter to the business office of the facility, the PCP, the IPA Medical Director and the HMO Nurse Liaison;

g) Upon receipt of the letter, HMO notifies the member of the denial of benefits via the TOB letter;

h) The BCBS TOB letter and Appeals Attachment is faxed to the business office of the facility, the PCP, IPA Medical Director, IPA UM Coordinator, HMO UM Manager, HMO Provider Network Consultant, BCBSIL HMO Medical Director, and HMO Claims Department; and

i) For a BH termination of benefits denial:
i. The PCP may agree to defer the denial decision and termination of benefits to the BH specialist. A written PCP statement of agreement must be provided to the IPA for the termination of benefits decision to be completed.

ii. The BH specialist would like to communicate with the PCP, but the member will not allow communication with their PCP: A statement from the member must be obtained stating they will not allow communication with their PCP.

**Transition of Care**

1. **Transition to Other Care**
   Transition of care is applicable when a member is new to the HMO, is displaced by physician de-participation, or is displaced by termination of an IPA contract. New members must request transition of care services within 15 days of eligibility and existing member within 30 business days after receiving notification of displacement. Members in one of these situations who are receiving frequent or ongoing care for a medical condition or pregnancy beyond the first trimester may request assistance to continue with established specialists for a defined timeframe. Such members should be directed to the HMO Customer Assistance Unit (CAU) at (312) 653-6600 for help in this matter.

2. **Transition of Care from Pediatric to Adult Care**
   Transition of Care from Pediatric to Adult Care is applicable for member reaching adulthood and/or for pregnant adolescents. The IPA must periodically assess its membership for member reaching adulthood and those who have not chosen an adult PCP, and provide the member with assistance in selecting a PCP.

3. **Exhaustion of a Limited Benefit**
   Some Benefits Plans have limited benefits for outpatient rehabilitation therapies. Once a member has exhausted a limited benefit, the IPA must document this in writing to the member within two business days. The written communication must include:
   - The fact that benefits are exhausted
   - PCP name
   - Appeal rights and procedure
   - Reminder that the charges incurred beyond the contract limits are the member’s financial responsibility
   - An offer to educate member about alternatives to continuation of care and ways to obtain further care as appropriate.

The organization must have a Policy and Procedure on Transition to Other Care describing the IPA’s process for notifying member of an exhausted benefit, transition of care and/or transition of care from Pediatric to Adult Care.

**Emergency Services**

The HMO contractually requires IPAs to follow the “prudent layperson” standard set forth in the MSA in making UM decisions related to emergency services. Emergency services are covered if an authorized representative, acting for the organization, authorizes the provision of emergency services.

**Maternity Discharge Program**

The HMO requires that each IPA develop and adhere to a maternity discharge program to help manage
utilization. This program should be included within the Utilization Review process. The following elements are required for an acceptable HMO OB Discharge Plan:

a) Documentation of pre-natal education with the mother and information about the OB Discharge Program during the first and second trimester;
b) Documentation of eligibility criteria related to the OB Discharge Program; and
c) Arrangements for an infant examination either by a Practitioner or by a Nurse visit to the home within 48 hours after discharge from the hospital must be offered if the infant is discharged less than 48 hours after vaginal delivery or less than 96 hours after Cesarean delivery.

Organ Transplants
IPAs are responsible for monitoring all aspects of clinical care including referral, pre-certification, and concurrent review related to organ transplants. The IPA should notify the HMO Transplant-Coordinator prior to the member’s evaluation at a BCBS transplant network facility. The HMO Transplant Coordinator will confirm that the facility is currently in the HMO transplant network for the relevant organ. If the member is accepted as a transplant candidate, the IPA forwards required documents to the HMO Transplant Coordinator for HMO administrative review. These documents include a copy of the referral, the member’s history, the reason for transplant, a letter from the PCP indicating his/her approval, and a letter from the transplant facility confirming the member’s transplant candidate status. Following the HMO review, the HMO Transplant Coordinator will provide the IPA with a letter indicating that services are approved in benefit for the requested facility, as applicable. Members that are referred for, or that receive, organ transplants should be evaluated for inclusion in the IPA’s Complex Case Management Program. If the member is receiving active Case Management services from the Transplant Facility, documentation that you are collaborating directly with the Transplant Care Team is an acceptable substitution so that the member is not receiving calls from multiple Case Managers.

Out of Area / Out of Network Admissions
Out of Area Admissions
The HMO is financially responsible for out-of-area admissions where member is admitted for an emergency condition or life-threatening situation more than a 30-mile radius from the IPA Physician or IPA affiliated hospital in which the member is enrolled. The IPA retains responsibility for monitoring clinical aspects of care and for arranging the transfer of the member back into an in-network facility once clinically appropriate. When the treating physician determines that the member is medically stable for transfer, the IPA notifies the PCP that the member can be brought back into an in-network facility within one business day of IPA notification. Refer to Termination of Benefits (TOB) section for protocol of issuing TOB if member refuses to transfer in-plan.

Out of Network Admissions
Out-of-Network admissions are urgent or emergent admissions that are within a 30-mile radius of the contracting IPA Physician or IPA affiliated hospital in which the member is enrolled and occur without prior IPA approval. IPA’s responsibilities include: As soon as the IPA Physician becomes aware of the admission, the UM Coordinator will obtain an initial review and patient information including the following:

a) Monitoring of care to determine when the member is stable;
b) All reviews for members who remain in an OON hospital for greater than two (2) midnights must be reviewed with the IPA Medical Director to discuss if transfer back in-network should be initiated or continued stay is required;
c) When stable, facilitates the transfer of the member to an in-network facility; and
d) Coordinates notification to the member concerning the decision to transfer.

**Infertility**

Either the PCP or the Woman’s Principal Health Care Provider (WPHCP) may establish a diagnosis of infertility. Once this diagnosis has been made, either the PCP or the WPHCP may refer the member for global infertility services to a HMO contracted infertility provider. Such a referral is required for these services to be in benefit. Reference may be made to the MSA, HMO Infertility Policy and/or the HMO Scope of Benefits for further information.

**Record Retention**

The IPA shall maintain all records necessary to allow HMO to audit and review IPA’s performance and compliance with the terms of the Agreement. IPA shall require all subcontractors, agents or delegates working for, or on behalf of, IPA to comply with the terms of this provision. For purposes of this provision, “record(s)” shall mean all written or electronic material, video or CD-ROM, computer diskette or any other media that is used to store information, including but not limited to medical, administrative, financial, telephonic and technical records. IPA shall maintain such records for a minimum of ten (10) years from the date of termination of this Agreement. This provision shall survive termination of the Agreement.

**HMO Population Health Management (PHM) Program Strategy, Structure and Resources**

The Population Health Management Program seeks to provide a cohesive plan of action for addressing member needs across the continuum of care. *(See Appendix D: 2019 Population Health Management Program Strategy)*

**Population Health Management Strategy at a Glance:**

![Population Health Management Diagram](image)

The BCBSIL HMO Population Health Management Strategy includes:

A. Goals and specific populations targeted;
B. Programs and Services offered to members;
C. Activities that are not direct member interventions;
D. How member programs are coordinated; and
E. How members are informed about available PHM programs.
A. Areas of Focus and Programs offered to members:

**Keeping Members Healthy: Wellness and Prevention** – The wellness and prevention programs focus on keeping members healthy and safe. The organization offers wellness services focused on preventing illness and injury, promoting health and productivity and reducing risk. Currently, the program includes:

− **Cancer Screening Program** which includes: Breast Cancer Screening, Cervical Cancer Screening, and Colorectal Cancer Screening goals

− **Well Child Care Screening Program** which includes: Screening for children ages 3-17
  − BMI Percentile,
  − Counseling for Nutrition, and
  − Counseling for Physical Activity

− **Depression Screening Program** which includes: Screening for all members > 12 years of age who have not already been diagnosed with depression or dysthymia within the prior 12 months. (And who had at least one face-to-face visit with their PCP in the past year). The depression screen is completed during the face-to-face visit.

− **Opioid Patient Contract Initiative** which includes: Prescribing Physicians documentation of an Opioid Contract for all members with chronic opioid prescribing in the EHR within 60 days of criteria for inclusion in the initiative. (See Appendix D: 2019 Population Health Management Program Strategy).

The HMO contracts with an NCQA accredited third party vendor who offers our members Health Appraisals which meet all accreditation requirements. Health appraisal language is in easy-to-understand language. The HMO reviews and updates the Health appraisal at least every two years, but has the capability to administer the Health Appraisal annually.

The HMO offers its members evidence based self-management tools.

**Managing Members with Emerging Risk: Condition Management Programs** – Currently, HMO requires two separate and distinct Condition Management Programs: Diabetes Mellitus and Asthma. Criteria for inclusion in each of the programs is described later in this document. Each Condition Management Program includes two levels of risk stratification: Tier 1 and Tier 2. Tier 1 represents members with better control, and tier 2 represents members with poor control. Tier 2 members receive bi-directional communication from a care manager on a monthly basis.

**Managing Safety or Outcomes Across Settings: Case Management Program** – Case Management addresses the needs of members who require education related to management of their health care, behavioral health and/or social needs. Case Management members typically consist of those persons with multiple chronic conditions, **need assistance during transitions in care**, or need shorter term assistance in navigating the health care system. The Case Management Program focuses on Managing Safety and Outcomes Across Settings. All members will receive a post discharge transition of care call within 48 hours of discharge from an acute care setting (when discharged to home). Eligible members will also keep scheduled appointments with their PCP or Specialist within seven (7) days of discharge from an acute care setting.
The IPA will review daily ER logs and/or transmissions received from the Affiliated Hospitals in order to identify potential opportunities for real-time education related to PCED utilization, transition of care needs, or potential CCM needs. Semi-annually, the HMO will randomly audit that the IPA is monitoring, reviewing and acting upon daily ER data as it is received.

**Managing Multiple Conditions: Complex Case Management Program** – Complex Case Management addresses the needs of members with multiple, complex and/or high cost conditions requiring assistance with coordination of multiple services and/or health needs with significant barriers to self-care. The organization coordinates services for its highest risk members with complex conditions and helps them access needed resources.

**B. Non-Direct Member Interventions:**
The HMO provides its practitioners with integrated data which serves as a predictive modeling report informing practitioners of their at-risk members that may benefit from population health management programs. The HMO also provides technology to help support the condition management, and complex case management programs. Lastly, the HMO offers value-based payment arrangements including quality pay-for-performance programs.

**C. Member Coordination:**
The IPA coordinates member movement between Population Health Management programs. Members may be included in a Wellness and Prevention intervention while also actively managed in other population health management programs. If a member receiving care in a Condition Management Program requires a higher level of service, the Condition Management case will be closed and the member will be transitioned to Complex Case Management. The IPA care manager will inform the member if they are closing a case and will explain how, if needed, the member’s care will be managed and transitioned to a new program.

**D. Member and Practitioner Notification and Communication of Interactive Population Health Programs**
Members and practitioners must be aware of the IPA’s Population Health Management Programs. Member Notification methods may include, but are not limited to, the member Welcome Letter, and/or phone calls.

- Member notification must address how the member will use services provided by the IPA’s interactive Population Health Management Programs, how to become eligible to participate as well as how to opt-out of the programs.
- Practitioner notification must include how the Population Health Management program, including Wellness and Prevention, Condition Management, Case Management and Complex Case Management is utilized and how the IPA works with patients in the Program.

IPA’s are required to include information related to how the IPA member and physicians are notified of the IPA’s Population Health Programs in the IPA’s Utilization and Population Health Management Plan.

**Population Identification**
The Health Plan systematically collects, integrates and assesses member data to inform its population health management programs. The Health Plan integrates data to use for population identification and risk stratification purposes:
a) Medical and behavioral claims and encounters;
b) Pharmacy claims;
c) Laboratory results and/or EHR records;
d) Health appraisal results; and
e) Data from other health service programs: UM Program.

The IPA will identify members on a monthly basis utilizing the following referral sources:
a) Medical management program referral (UM/CCM/Condition Mgmt./Health Info. Line referral);
b) Discharge planner referral;
c) Member of caregiver referral; and
d) Practitioner referral.

Assessing the Needs of the Member Population
Annually, the HMO uses available data sources to assess the needs of the member population and subpopulations and updates the HMO and IPA PHM Programs accordingly. This includes but is not limited to assessing characteristics and needs, social determinants of health, of its member population, relevant member subpopulations, the needs of children and adolescents, individuals with disabilities and individuals with serious and persistent mental illness.

a) The HMO UM Workgroup evaluates the data, which includes, but is not limited to US Census Data, Enterprise Data Warehouse (EDW) data, Provider Cost and Utilization reports from Actuarial data, Verscend Analytics data and prior years Population Health data.
b) Annually, HMO uses the population assessment to:
   i. Review and update its PHM activities to address member needs;
   ii. Review and update its PHM resources to address HMO needs;
   iii. Review community resources for integration into program offerings to address member needs (delegated to the IPA)
c) The HMO will provide annual reports specifying the number of members eligible for each category and the PHM programs or services for which they are eligible. (Reports will include raw numbers and percentage of overall population).
d) The method for stratifying the population is described in Appendix D: PHM Strategy;
e) IPA will stratify its entire population into subsets for targeted interventions;
f) IPA will make changes to their Population Health Program based on information received from the HMO annually.

The Population Health Management Programs are opt-out programs, members are automatically enrolled unless they request to opt-out of the program.

Measurement and Reporting of PHM Program Effectiveness
The Health Plan will measure performance of the impact of its Population Health Management Program annually. Measurement will include:

a) Quantitative results for relevant clinical, cost/utilization and experience measures;
   i. Clinical measures: HEDIS Measures
   ii. Cost/Utilization measures: Admits/1,000 and ED/1,000
   iii. Experience measures: Population Health and CCM Member Satisfaction Survey’s
b) Comparison of results with a benchmark or goal; and
c) Interpretation of results.
Annually, the results of the PHM program effectiveness will be utilized to identify opportunities for improvement. The Health Plan will act on at least one opportunity for improvement annually.

**PHM Delivery System Supports**
The HMO will work with its IPA providers to achieve population health management goals by:
  a) Sharing data (Utilization Management: Admits/Days/LOS, PCED);
  b) Sharing data (Quality Improvement: Care Gaps); and
  c) Offering certified shared-decision making aids.

**Value-Based Payment Arrangements**
100% of HMO providers participate in pay-for-performance opportunities and receive either full or partial capitation payments for management of their member populations.

**IPA Population Health Management Program Structure and Resources**
The delegated IPA is required to establish Population Health Management Programs designed to provide support and coordination for a Member’s care in collaboration with the Member’s PCP and interdisciplinary care team. All Complex Case Management services integrate with other IPA programs (UM, Wellness and Prevention, Condition Management and CM) as well as other services available to the member within the community.

The IPA is required to submit documentation of the IPA Population Management Program staff utilized to support the IPA Wellness and Prevention, Condition Management, CM and CCM services. Documentation may include a flow diagram and a roster of staff names, titles, certification or licensure, if applicable and the role and responsibility of the staff in supporting the IPA Population Health Management Programs. Any revisions to the IPA staff or process must be provided to the NL within 30 days of the change.

The IPA will identify the “Evidenced Based Sources” used for their Population Health Management Program and include this information in their Utilization Management and Population Health Management Plan program description.

**Members are identified as being eligible for the Population Health Management Programs on a monthly basis.**
The Primary Care Physicians (PCP) collaboration with the Case Manager is critical. In many ways, the Case Manager acts as an extension of the PCP in further educating the member and facilitating the coordination of the member’s care. The PCP is required to be informed of members newly enrolled in CCM, see CCM members at a face-to-face visit at least every 6 months and participate in communication with the Case Manager as needed during the intervention with the member.

**Population Health Documentation Requirements**
Documentation requirements for the Condition Management Care Plans differ in that the Care Plans for the Complex Case Management Program are documented in the HMO Provider Portal; however, the Condition Management Member Care Plans are documented in the IPA EHR or IPA Complex Case Management system rather than in the HMO Provider Portal. Documentation requires that there is automatic documentation of the staff member’s ID and date, and time of action on the case or when interaction with the member occurred. Automated prompts for next follow-up are also required. The IPA must document the process for how they
automate prompts for next follow-up.

Population Health Management Program Requirements
IPAs are required, on a monthly basis to upload to the HMO Provider Portal Case Management and Condition Management logs. These logs identify members enrolled in the IPA Population Health Management Program. (Please note, for Complex Case Management, logs are not required as the care plans for members in CCM are documented directly in the HMO Provider Portal)

Submission of members included in the CM and Condition Management Programs are required monthly, in the required format:
   a) The IPA must have the appropriate resources to support the program and systems to provide the analysis, evaluation and reporting of IPA Condition Management, CM, and CCM results;
   b) The IPA must complete an evidence based Depression Screening assessment for all members (who have a minimum of one (1) face-to-face visit during measurement period) for all members greater than or equal to 12 years of age without a diagnosis of depression or dysthymia in the prior 12 months. The depression screen is completed during the face-to-face visit. These members meet the criteria of screening for incentive purposes.
   c) The IPA must have a process in place to report to HMO any feedback received from the member regarding their Population Health Program experience, including but not limited to complaints and inquiries related to the program; and
   d) A quarterly summary of IPA Population Health Program results, must be reviewed by the UM Committee and reflected in the UM Committee Minutes, addressing goal setting, citing barriers, benefit coverage and community resources as applies to member. Identification of trends and interventions are to be documented, if applicable.

Identification of members for Condition Management and Case Management
   a) The Sources used to identify members for CM and Condition Management Programs must be identified and uploaded to the HMO Provider Portal on a monthly basis;
   b) In addition to appropriate review and identification of members on a monthly basis, members must meet criteria for appropriate stratification in each program. Stratification is based on severity of the member’s condition, which includes information provided by the member along with clinical information available to the practitioner;
   c) Depression Screening is required for all members ≥ 12 years of age within the entire Population, in the Condition Management Tier 2 program, CM, and CCM programs; The depression screen is done at the face to face visit. If a member is active in the CCM or Condition Management program, screening for depression is a required element of their care plan. However, it does not meet the criteria of screening done in the PCP office for incentive plan purposes.
   d) The Case Manager provides support, education and intervention based on each member’s level of stratification.

Population Health Program Policy and Procedure
A written policy describing the IPA’s Population Health Management Program is required. Components of the Policy must include:
   a) How member is notified of the Population Health Management Program, how to become eligible, and how to opt-out of the program;
b) How Providers are notified of the IPA Population Health Management Program and how the program can impact their patients;
c) How member is identified for the Population Health Management Program (e.g. IPA referral & Health Plan integrated data sources, etc.);
d) A written description of the Population Health Management Program structure and goals along with the components of each level of care;
e) Description of the IPA process for member assessment and risk stratification for the Condition Management Program along with the process for determining program effectiveness;
f) Process for transitioning member through the care continuum, as their condition changes.
g) The IPA is required to post a letter describing all programs offered to their members.

**Keeping Members Healthy and Safe: Wellness and Prevention Program**
The Wellness and Prevention program currently consists of the following:

Cancer Screening Program which includes screening for the following:

- a) Breast Cancer Screening for all women ages 50-74;
- b) Cervical Cancer Screening for all women ages 21-64; and
- c) Colorectal Screening for all members age 51-75.

Well Child Care which includes screening (ages 3-17) for the following:

- a) BMI Percentile, height and weight;
- b) Counseling for Nutrition; and
- c) Counseling for Physical Activity.

**Depression Screening**

- a) All members ≥ 12 years of age;
- b) Do not have a diagnosis of depression or dysthymia within the past 12 months (excluding members who have not had a face-to-face PCP visit in the prior year);
- c) Any evidence based depression screening tool is acceptable for use;
- d) The depression screen is completed during a face-to-face visit.

**Opioid Contracts**

- a) Are created for all members receiving treatment in a primary care setting who are prescribed narcotic pain relievers for chronic pain and/or condition(s);
- b) Signed and dated by the patient, or guardian if the patient is a minor, and Prescribing Physician (within 60 days of eligibility criteria);
- c) The type of opioid contract is at the discretion of the Prescribing Physician; and
- d) The contract must be documented in the patient EHR.

Goals for each of these programs can be found in Appendix D: BCBSIL 2019 Population Health Management Program Strategy.

**Managing Members with Emerging Risk: Condition Management Programs**
The Condition Management Programs aim to improve the member’s health status and self- management of specific chronic conditions through the use of condition monitoring, coaching, education, and behavioral strategies. The focus is on prevention, closing care gaps and healthy lifestyle. Condition Management services are provided by licensed clinical professionals.
Program Objectives
a) Providing member with an advocate within the health care system;
b) Improving communication among the member and physician;
c) Enhancing the member’s self-management skills;
d) Improving the member’s compliance with the physician’s treatment plan;
e) Reducing the intensity and frequency of disease-related symptoms;
f) Enhancing the member’s quality of life and functional status;
g) Reducing work disability and absenteeism;
h) Implementing interventions to close gaps in care and meet the member’s centric goals; and
i) Demonstrating impact savings by reducing hospitalizations and emergency department visits.

Member Identification and Enrollment
Candidates are identified, on a monthly basis, by utilizing the following sources:
a) BCBS HMO integrated data report;
b) Medical management program referral (UM/Condition Mgmt./Health Info. Line referral);
c) Discharge planner referral;
d) Member of caregiver referral; and
e) Practitioner referral.

Members eligible for the Asthma or Diabetes Condition Management programs will be stratified by the IPA Case Manager and automatically enrolled into one of two (2) tiers based on their severity of illness. Tier one includes members whose condition is less severe than that of tier two. Tier one members receive educational materials from their health plan, and are monitored by the IPA for change in clinical status requiring movement to tier two services and intervention. Tier 2 members receive IPA monthly bi-directional intervention and care planning services.

Members may be enrolled in both the Asthma as well as the Diabetes Condition Management Programs, when appropriate. However, once a Member is enrolled in either the Case Management or Complex Case Management Program, the Condition Management case should be closed until the member is discharged from the Case Management or Complex Case Management Program.

HMO utilizes Verscend as their data analytics vendor in order to enhance clinical intelligence and benchmarking capabilities. This web-based software currently integrates data from multiple sources (i.e., BCBSIL claims, IPA encounters, Pharmacy data, etc.) in order to identify and target risk and costs at both the population and individual member level. The system uses data-mining algorithms and evidence-based clinical rules to help identify and target gaps in the care of high-risk, high-cost members for clinical interventions and care-management programs. It is also used to track outcomes through sophisticated cohort tools.

Each contracted IPA has access to their population of members in the Verscend tool, available on the HMO Provider Portal. IPAs are encouraged to use the Verscend data for members in the programs to assist in integrating information for Utilization Management, Complex Case Management and Wellness programs.

Opt-Out
The HMO Condition Management Program is an opt-out program, meaning that all identified eligible members are included in the program, unless the member specifically states that they do not wish to receive any further
Condition Management Services (Opt-out). The IPA is responsible for submitting their active Condition Management members and those that have chosen opt-out to the HMO on a monthly basis.

The HMO measures program participation rates on an annual basis. Participation rates are calculated by including all eligible members in the denominator, and all members with at least one interactive contact in the numerator. Interactive contacts include either phone calls or surveys/quizzes completed by the member. Participation rates are reported and documented annually in the UM Committee Meeting Minutes.

Additionally, all HMO mailings instruct the member that they can opt-out of receiving HMO mailings by contacting the HMO Clinical Outcomes Management and Research Department at 312-653-3465.

**Program Components**

**Outreach**
Targeted outreach to members may include but is not limited to:

a) Instructions on how to use the services;
b) How they were identified for the services;
c) How to opt-out of the program;
d) Reference to clinical practice guidelines;
e) Details and contact information regarding the program;
f) Condition-specific informational brochures and mailings.

**Integration of Member Information Across all Population Health Programs:**
The Condition Management Program integrates with other Population Health Management Programs such as:

a) Wellness and Prevention Programs;
b) Other Condition Management Programs;
c) Case Management Program;
d) Complex Case Management Program; and
e) Utilization Management Program (if applicable).

**Communication with Practitioner**
The IPA provides its practitioners with written information about the organizations Condition Management Programs. Information must include instructions on how to use the Condition Management Services and how the IPA works with the practitioner to manage the patients in the program.

**Member Experience**
The Health Plan annually evaluates the members experience with the Population Health Management Program. Satisfaction Survey questions include satisfaction with the overall program, the helpfulness of program staff, the usefulness of the information disseminated, and the members experience in adhering to their treatment plans. An analysis of the survey results is reported to the HMO Quality Improvement Committee annually. Member complaints regarding the Population Health Management Program are reported to the IPA UM Committee and HMO QI Committee on an annual basis to further assess member experience with the program.

**Asthma Condition Management Program**
People with asthma require frequent interaction with the health care system to manage their asthma. Although asthma cannot be cured, symptoms can be controlled with appropriate medical care, combined with
efforts to control exposure to triggers. When asthma is properly managed, inpatient hospitalizations and emergency department visits can be prevented. Improvements in patient self-management, adherence to treatment plans and proper medication regimen have been linked to positive clinical outcomes. With effective education and adherence to evidence based clinical practice guidelines, asthmatic members can improve their health status and quality of life through self-care and lifestyle management.

The goals of the Asthma Condition Management Program are to improve asthma care by increasing the percentage of asthmatic members:

a) Who receive a written Asthma Action Plan;
b) Whose asthma is Well Controlled (demonstrated by use of ACT, ATAQ or ACQ testing);
c) Who have a face-to-face visit with their physician to review asthma care if asthma is Not Well Controlled;
d) Who achieve compliance with the HEDIS-QI Administrative Indicator for medication management for people with Asthma;
e) Who achieve compliance with the HEDIS-QI Administrative Indicator for the Asthma Medication Ratio
f) Whose physicians provide asthma care in accordance with the National Asthma Education and Prevention Program (NAEPP) guidelines;
g) Who are screened for depression when twelve (12) years old or older, when appropriate;
h) Who receive post hospital transition of care calls in order to decrease readmission rates when hospitalizations are necessary (all cause admissions);
i) Who report ≥90%-member satisfaction with the Asthma Condition Management Program.

 Eligible Asthma Population
Members age 5 to 64 who met at least one of the following during a rolling 24-month period are identified as eligible for the program:

a) At least one Emergency Department visit with asthma as the principal diagnosis;
b) At least one acute inpatient discharge with asthma as the principal diagnosis;
c) At least four outpatient visits with asthma as one of the diagnoses and at least two asthma medication dispensing events;
d) At least four asthma medication dispensing events plus at least one claim or encounter in the outpatient setting with asthma as one of the listed diagnoses;
e) Enrolled in the Complex Case Management (CCM) program and have a diagnosis of asthma;
f) Completed an HRA and self-reported having a diagnosis of asthma;
g) Self-referred into the Asthma Condition Management Program;
h) Practitioner referred member to the Asthma Condition Management Program.

Asthma Condition Management Stratification and Program Content
The Condition Management Program provides interventions to members based on assessment and condition risk stratification. The levels of condition stratification for the Condition Management portion of the Population Health program include:
### Severity Stratification

<table>
<thead>
<tr>
<th>Tier 2</th>
<th>Clinical Status</th>
<th>Interventions</th>
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| Tier 2 | Moderate Persistent/ Severe Persistent Asthma | - Semi-Annual Doctor Visit  
- HMO Mailings  
- IPA Care Management Monthly Bi-Directional Phone Contact  
- Asthma Action Plan updated once per calendar year  
- Asthma Control, as evidenced by ACT, ATAQ or ACQ testing  
- Screened for Depression at least once per calendar year (>12 years of age)  
- Transition of Care Calls |
| Tier 1 | Mild Intermittent/ Moderate Intermittent Mild Persistent Asthma | - Annual Doctor Visit  
- HMO Mailings  
- IPA Ongoing Monitoring for changes in status of Asthma condition  
- Screened for Depression at least once per calendar year (≥ 12 years of age)  
- Transition of Care Calls |

**Tier 2**

a) All Tier 1 Services; PLUS  

b) Monthly bi-directional communication with an IPA Case Manager:  
   - Individualized Condition Management Care Plan  

  c) Asthma Action Plan within calendar year;  

d) Asthma Control, demonstrated by use of an Asthma Control Test (ACT), ATAQ or ACQ test within calendar year 2019;  

e) Post Hospital Phone Call within 48 hours of Discharge from Hospital (All cause hospitalizations), if hospitalized.  

f) Depression Screening-(with referral when indicated) within calendar year for members ≥ twelve (12) years of age. (PHQ, M3, HAMD, MADRS) Any evidence based depression screening tool is acceptable for use.
**Tier 1**

a) **BCBS Mailings:**
   - Mailings for children identified with asthma are addressed to the parents of the child and letters to the parents of the children have been adapted to reflect that the recipient is a caregiver and not the patient.

b) **Asthma Condition Management Welcome Letter;**

c) **Newly Identified Member Letter;**

d) **Personal Asthma Management Brochure which includes:**
   - Condition Monitoring (including self-monitoring and medical testing);
   - Adherence to Treatment Plans (including medication adherence);
   - Medical and Behavioral Comorbidities of Asthma (e.g., cognitive deficits, physical limitations);
   - Health Behaviors;
   - Psychosocial Issues that may impact Asthma Care;
   - Depression Screening and Asthma Care;
   - Providing Information about the patient’s condition to caregivers who have the patient’s consent;
   - Encouragement to see their doctor; and
   - Provides References to External Asthma Resources such as: The American Lung Association (http://www.lung.org/lung-disease/asthma/) and The National Heart, Lung, and Blood Institute (http://www.nhlbi.nih.gov/health/health-topics/topics/asthma/).

e) **Depression Screening**-(with referral when indicated) within calendar year for members > twelve (12) years of age. (PHQ, M3, HAMD, MADRS) Any evidence based depression screening tool is acceptable for use.

f) **IPA continuous monitoring for changes in Asthma Control,** which would require that the member be moved to the Tier 2 Condition Management Program.

**Member Information**

BCBSIL provides all eligible members identified for the Asthma Condition Management Program with information about this program. The welcome letter and each subsequent mailing to members include:

a) A brief description of how members were identified for the program, referencing member identification using claims, pharmacy data, health risk assessment, physician referral, case management records or self-referral;

b) The phone number for members to call if they want to opt out of the program; and

c) Information about how to use the program.

Examples include:

- A recommendation to take the Asthma Action Plan to their physician for completion;
- A recommendation to get an annual flu shot;
- A recommendation for asthmatics to use information in the enclosed brochure to evaluate asthma control; and
- How to obtain information about asthma on Blue Access for Members, the secure member web portal.

The mailings encourage members to work with their doctor for management of their asthma. All members
with gaps in care for asthma services during the current year receive outreach from their IPA. The goal is to encourage members to see their physicians for recommended asthma services at least twice per year.

**Measurement of Asthma Condition Management Program Effectiveness**

The current performance measurement goals for the Asthma Condition Management Program are:

<table>
<thead>
<tr>
<th>Performance Measure</th>
<th>Performance Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>-Asthma Action Plan</td>
<td>90%</td>
</tr>
<tr>
<td>-Asthma Control (demonstrated by Asthma Control Test)</td>
<td>70%</td>
</tr>
<tr>
<td>-HEDIS: QI Administrative Indicator: Medication Mgmt. for People</td>
<td>51%-53%</td>
</tr>
<tr>
<td>-HEDIS: QI Administrative Indicator: Asthma Medication Ratio</td>
<td>81.75%-83%</td>
</tr>
<tr>
<td>-Depression Screening (&gt; age 12 y/o)</td>
<td>70%</td>
</tr>
<tr>
<td>-Member Satisfaction with the CCM and Condition Mgmt. Program</td>
<td>90%</td>
</tr>
<tr>
<td>-Transition of Care Call within 48 hrs. of discharge</td>
<td>90%</td>
</tr>
</tbody>
</table>

A summary of the program’s results and qualitative and quantitative analysis of data as well as planned interventions to improve the program’s effectiveness is reported at the HMO QI Committee on an annual basis.

**Diabetes Condition Management Program**

Diabetes Condition Management Risk Stratification and Program Content

Both Type 1 and Type 2 diabetes are chronic diseases that can lead to serious complications, such as heart disease, stroke, blindness, kidney failure and lower-limb amputation. Some complications, especially microvascular (e.g., eye, kidney and nerve) disease, can be reduced with good glucose control.

Adherence to treatment plans and proper medication regimen and improvements inpatient self-management has been linked to positive clinical outcomes. With effective education and adherence to evidence based clinical practice guidelines, diabetic members can positively impact their long-term health status and quality of life through self-care and lifestyle management. Better self-management may also reduce the cost of care.

The goals of the Diabetes Condition Management Program are to improve diabetes care by increasing the percentage of diabetic members:

a) Whose Diabetes is Well Controlled;

b) Who have a face-to-face visit with their physician to review diabetes care if diabetes in not well controlled;

c) Who are screened for depression when greater than twelve (12) years old and older, when appropriate; *(Any evidence based depression screening tool is acceptable).*

d) Who receive post hospital transition of care calls in order to decrease readmission rates when hospitalizations are necessary (all cause admissions);

e) Who report >90%-member satisfaction with the Diabetes Condition Management Program.

**Eligible Diabetic Population**

Members age 18 to 75 who met any of the following during a rolling 14-month period are identified as eligible for the program:

a) Two face-to-face claims or encounters on different dates of service in an outpatient setting, emergency room setting or non-acute inpatient setting with a diagnosis of diabetes;

b) One face-to-face claim or encounter in an acute inpatient setting with a diagnosis of diabetes;
c) Dispensed insulin or oral hypoglycemic and/or antihyperglycemics on an ambulatory basis;

d) Enrolled in the Complex Case Management (CCM) program and have a diagnosis of diabetes;

e) Referred by their practitioner for the Diabetes Condition Management Program;

f) Completed an HRA and self-reported having a diagnosis of diabetes; and

g) Self-referred into the Diabetes Condition Management Program.

**Diabetes Condition Management Stratification and Program Content**

The Condition Management Program provides interventions to members based on assessment and condition risk stratification. The levels of condition stratification for Condition Management include:

<table>
<thead>
<tr>
<th>Severity Stratification</th>
<th>Clinical Status</th>
<th>Interventions</th>
</tr>
</thead>
</table>
| **Tier 2** | HbA1C > 9 | - HMO Mailings  
- IPA Care Management Monthly Bi-Directional Phone Contact  
- Ongoing Monitoring for changes in status of Diabetes condition and HbA1C levels  
- Screened for Depression at least once per calendar year (≥12 years of age)  
- Transition of Care Calls |
| **Tier 1** | HbA1C < 9 | - HMO Mailings  
- Ongoing Monitoring for changes in status of Diabetes condition and HbA1C levels  
- Screened for Depression at least once per calendar year (≥12 years of age)  
- Transition of Care Calls |

**Tier 2**

a) All Tier 1 Services; PLUS

b) Monthly bi-directional communication with an IPA Case Manager:
   - Individualized Condition Management Care Plan

c) Post Hospital Phone Call within 48 hours of Discharge from Hospital (All cause hospitalizations), if hospitalized.
d) Depression Screening (with referral when indicated) within calendar year for members ≥ twelve (12) years of age. (PHQ, M3, HAMD, MADRS) Any evidence based depression screening tool is acceptable for use.

Tier 1

a) BCBS HMO Mailings:
   - Mailings for children identified with diabetes are addressed to the parents of the child and letters to the parents of the children have been adapted to reflect that the recipient is a caregiver and not the patient.

b) Diabetes Condition Management Welcome Letter;

c) Newly Identified Member Letter;

d) Diabetes Brochures and Mailings Address all of the following:
   - Condition Monitoring (including self-monitoring and medical testing);
   - Adherence to Treatment Plans (including medication adherence);
   - Medical and Behavioral Comorbidities of Diabetes (e.g., cognitive deficits, physical limitations);
   - Health Behaviors;
   - Psychosocial Issues that may impact diabetes Care;
   - Depression Screening and diabetes Care;
   - Providing Information about the patient’s condition to caregivers who have the patient’s consent;
   - Encouragement to see their doctor; and
   - Provides References to External Diabetes Resources such as the American Diabetes Association web site www.diabetes.org.

e) Depression Screening (with referral when indicated) within calendar year for members ≥ twelve (12) years of age. (PHQ, M3, HAMD, MADRS) Any evidence based depression screening tool is acceptable for use.

f) IPA continuous monitoring for changes in Diabetic HbA1C Control which would require that the member be moved to the Tier 2 Condition Management Program.

Member Information

BCBSIL provides all eligible members identified for the Condition Management Program with information about this program. The welcome letter and each subsequent mailing to members include:

a) A brief description of how members were identified for the program, referencing member identification using claims, pharmacy data, health risk assessment, physician referral, case management records or self-referral

b) The phone number for members to call if they want to opt out of the program

c) Information about how to use the program. While the specific content varies depending upon the mailing, examples include:
   - A reference to the mailings about diabetes that the member will receive;
   - How to obtain a free glucose meter;
   - Use of the diabetes care card to track diabetes services and lab results, weight and blood pressure;
   - How to obtain information about diabetes on the bcbsil.com My Health on Blue Access for Members, the secure member web portal.
Some of the mailings also provide information about BCBSIL collaboration with IPAs, and all encourage members to work with their doctor for management of their diabetes.

**Measurement of Diabetes Condition Management Program Effectiveness**

The current performance measurement goals for the Diabetes Condition Management Program are:

<table>
<thead>
<tr>
<th>Performance Measure</th>
<th>Performance Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>-HbA1C &lt;8</td>
<td>79% 69%</td>
</tr>
<tr>
<td>-Depression Screening</td>
<td>85%</td>
</tr>
<tr>
<td>-Member Satisfaction with the CCM and DM Condition Mgmt. Program</td>
<td>90%</td>
</tr>
<tr>
<td>-Transition of Care Call within 48 hrs. of discharge</td>
<td>90%</td>
</tr>
</tbody>
</table>

A summary of the program’s results and qualitative and quantitative analysis of data as well as planned interventions to improve the program’s effectiveness is reported at the HMO QI Committee on an annual basis.

**Managing Safety and Outcomes Across Settings: Case Management Program**

The Case Management (CM) Program is an integral part of the Population Health Program. Case Management addresses the needs of members who require education related to management of their health care, behavioral health and/or social needs. Case Management members typically consist of those persons with multiple chronic conditions, need assistance during transitions in care, or need shorter term assistance in navigating the health care system. The Case Management Program seeks to manage member Safety and Outcomes Across Settings.

All members who are enrolled in the Condition Management Tier 1, Tier 2 and CCM programs who are discharged from the hospital will receive a post hospital transition of care call within 48 hours of discharge from the hospital (when discharged from home). The transition of care call will include review of all pre-and post-hospital medications with a medication reconciliation performed and documented.

>50% of eligible members (Condition Management Tier 1, Tier 2 and CCM) will keep their follow-up office visits with their PCP or Specialist within seven (7) days of discharge. The IPA will document the follow-up office visit with the Member’s PCP or specialist treating the member for the admission, within seven (7) days of discharge via the IPA Portal. This is solely measured based upon claim and encounter data. **Documentation of analysis of IPA findings is required on a quarterly basis in the IPA UM Committee minutes.**

A random sample of Case Management files will be audited for the following elements:

a) Transition of Care (TOC) Calls made within 48 hours of discharge (all cause) when hospitalized;

b) Eligible members (Condition Management Tiers 1 and 2 and CCM) who keep a follow-up appointment with PCP or Specialist within 7 days of discharge from the hospital.

**Managing Multiple Chronic Conditions: Complex Case Management Program**

The Complex Case Management Program aims to address the needs of members with multiple, complex and/or high cost conditions requiring assistance with coordination of multiple services and/or health needs, including significant barriers to self-care. Complex Case Management is an intervention uniquely effective in managing the health care needs of these members.

Members with catastrophic or multiple complex conditions, include the disabled, along with children and adolescents, whose care is often complicated by severe Behavioral Health or social challenges. It involves the systematic assessment and coordination of care and services provided to members who are experiencing a
Complex clinical situation and are at the highest risk within the population. A complex clinical situation involves one or more critical or catastrophic events or diagnoses that require extensive use of resources and help navigating the system to facilitate appropriate delivery of care and services. Appendix A: Complex Case Management Referral Guidelines outlines conditions appropriate for Complex Case Management services. These guidelines were created with oversight of the HMO Medical Director, HMO UM Committee and Case Management Society of America (CMSA) website.

The degree and Complexity of the member’s illness or condition is typically severe, the level of Case Management and/or the amount of resources required for the member is extensive. Through the IPA Case Management process, these members are assisted in the access to care and services and their care is coordinated with the assistance of the IPA. The goals are to help the member regain optimal health, provide assistance in obtaining multiple services, learn self-management skills, and/or help gain improvements in level of functioning.

To assist with the identification of eligible Complex Case Management members, HMO shall provide the IPA with integrated data source reports on a monthly basis. The IPA’s must also produce their own referral source reports on a monthly basis. **Eligibility for the Complex Case Management Program is defined as the date that the member is identified by either the HMO integrated data source report or IPA referral source.**

Members who are identified as eligible for Complex Case Management must have an Initial Assessment (IA) completed within thirty 60 days of the eligibility date. **The date that the Initial Assessment is completed is the date the member is enrolled in the Complex Case Management Program.**

**Complex Case Management Program Referral and Data Sources**

To further assist the IPA, the HMO will provide IPA with monthly integrated data source reports identifying eligible members for CCM services. This information will be made available on a monthly basis via the HMO Provider Portal. The HMO uses a method of identifying members with potential complex care needs using predictive modeling software and paid claims data for the most current annual period for which such data exists. Should an Eligible Member, identified by a data source, not meet the HMO guidelines for Complex Case Management (Appendix A) or if the Case Manager uses his/her clinical judgement and determines that the member does not have complex care needs, the member should be evaluated to determine if they are appropriate for enrollment in the IPA Condition Management (rather than Complex Case Management) Programs.

IPAs are required to identify members eligible for Complex Case Management services using all of the following referral and data sources:

a) BCBS HMO integrated data report;
b) Medical management program referral (UM/Condition Management/Health Info. Line referral);
c) Discharge planner referral; 
d) Member of caregiver referral; and
e) Practitioner referral.

**IPA Referral Source Reports must be posted to the HMO Provider Portal on a monthly basis and will be monitored by the HMO.**
IPA Complex Case Management Requirements

I. Initial Assessment

The Initial Assessment (IA), documented in the HMO Provider Portal, must include the following:

a) Document the date the member’s eligibility for CCM was determined. The eligibility date is the date the member was identified by either data or referral source. The IA must be **initiated** within 30 days of eligibility;

b) Document the date the Initial Assessment was completed. The IA must be **completed** within 60 days of eligibility/identification. If the Initial Assessment is initiated greater than 30 days after eligibility, user must attest that the information is current and complete;

c) If an IA is not initiated within 30 days after member is determined by the IPA to be eligible for CCM, the IPA must demonstrate they attempted to contact the member at least three times over a two-week period within the first 30 days of eligibility, to complete the Initial Assessment. Case should be closed if unable to contact the member after three attempts are documented;

d) Document the following required elements for the Initial Assessment:

1. Initial assessment of the member’s health status and condition specific issues;
2. Diagnoses – acute and chronic conditions;
3. Procedures – historical and current, including inpatient stays, or document “none”;
4. Current status of diagnoses documented, include mental health and/or Substance Use Disorder diagnoses;
5. Clinical and treatment history – include disease onset, history from the onset of the condition(s) leading to the current health status;
6. Medications **including dosage, schedule and history of discontinued medications**;
7. Ability and/or barriers to perform activities of daily living including, at minimum, the following assessment: bathing, hygiene, dressing, toileting, transferring or functional mobility and eating;
   If a member needs assistance with any ADL, the documentation must describe the type of assistance and reason for the need for assistance.
8. Current mental health status including any mental health conditions or substance use disorders.
9. Assessment of cognitive functioning including the member’s ability to communicate and understand instructions and the member’s ability to process information about an illness;
10. Language Assessment including primary language member uses to communicate;
11. Assessment of Cultural Preferences and cultural health beliefs or practices or limitations. Documentation must identify potential barriers to effective communication or care and acceptability of specific treatments;
12. Assessment of Behavioral Health status. Assess if the member with Behavioral Health/SUD diagnosis has signed a Release of Information allowing communication Initial Assessment between the PCP and Behavioral Health Specialist;
13. Initial assessment of Social Determinants of Health (housing, housing security, access to food markets, exposure to crime/violence, discrimination, access to media, social support, access to transportation and/or financial barriers) and their potential impact on the member’s ability to meet their goals.
14. For those members with ongoing opioid prescriptions for chronic conditions, an opioid patient contract is on file in the Electronic Health Record.
15. Assessment of life planning activities and documentation of collaboration with PCP if appropriate. If life planning activities are determined to be appropriate, the case manager documents what activities the member has taken and what documents are in place. If determined not to be appropriate, the case manager documents the reason.
16. Documentation of hearing or vision limitations and identification of potential barriers to care, or “no limitations”;
17. Evaluation of linguistic needs or preferences including health literacy. Documentation must include specific needs to include in the case management plan and barriers to effective communication of care.
18. Evaluation of the adequacy of caregiver resources, involvement, and understanding of care. Documentation must describe the resources in place, whether they are sufficient for the member’s needs, and note any specific gaps to address.
19. Documentation of benefits, and benefit limitations including an assessment of the adequacy of the member’s benefits to fulfill the treatment plan (Available benefits must be specific and adequate to meet the member needs and documentation must state member’s understanding of the benefit). Example: member with a diagnosis of acute CVA with secondary hemiplegia. Documentation of available benefits should reference whether the member’s benefits cover the required treatments and prescriptions. 60-session limitation of PT/OT and ST per calendar year. Documentation must state that the member is aware of this;
20. Documentation must include the case manager’s evaluation of the member’s eligibility for community resources, the availability of those resources and which resources the member may need. At minimum, the following community resources must be assessed: community mental health programs, transportation, wellness programs, nutritional support and palliative care programs; (ex.- Meals on wheels, township services, legal aid), or not (document reason if not needed);
21. Assessment of life planning activities; and
22. Member self-management plan. The member self-management plan is verbally communicated to the member.

II. Complex Case Management Care Plan Requirements
The Case Manager assists, educates and counsels the member. Non-Case Managers may support the IPA Case Manager, however establishing, revising and assessing goals must be conducted by the Case Manager. Monthly contacts are to be conducted by the Case Manager. The IPA Case Manager must develop a care plan in collaboration with the member and the member’s PCP or Specialist.

As the following services are provided, the Plan of Care is updated:

a) Prioritized goals selected by the Case Manager and member must be in SMART (Specific, Measurable, Achievable, Relevant, Time-Bound) Goal format
b) Progress and assessment toward goals as levels of interventions are implemented;
c) Assessment of Barriers toward achieving the goals;
d) Depression screening for all members in CCM who do not have a diagnosis of depression or dysthymia. This is a required element of the member’s care plan. However, it does not meet the criteria of screening done in the PCP office for incentive plan purposes.
e) Social Determinants of Health incorporated into the Complex Case Management Care Plan;
f) Assessment of Community Resources incorporated into the Complex Case Management Care Plan; Complex Case Management plan of care reflects IPAs resources based on the Case Manager’s utilization/application of the IPAs Population Health data.
g) Revising SMART goals and treatment plan as appropriate; ongoing collaboration and planning with the member, family/caregiver, the PCP and other health care providers. The Case Manager must apprise the PCP of the member’s progress at least every 6 months;
h) Educating the member and the family/caregiver, about treatment options and available resources to improve quality of care; and  
i) Transitioning the member to the next level of care when outcomes have been attained or when the needs of the member change.

III. Member Contact
The IPA must perform and document at least one-member bi-directional contact monthly between member and Case Manager, unless member’s condition or preference is noted otherwise. The documentation must meet the following criteria:

a) Monthly Contact clearly documented as a contact between member and Case Manager;
b) Contact must be face-to-face or telephonic and must be bi-directional. The exchange of voice mail or email messages will not be considered bi-directional;
c) Automatic documentation of the member contact with staff including member Name, member ID, and the date, time and duration of the contact;
d) Documentation of assessment of barriers (including environmental barriers) to existing goals;
e) Documentation of three (3) member’s centric goals, including a minimum of one self-management goal, related to the member’s specific current needs whether medical or BH related, approved by the PCP or BH Specialist upon enrollment and every 6 months. Goals must be prioritized, numbered, attainable, measurable, current, reviewed and revised before the expiration date and considers member and caregiver preferences and desired involvement;
f) Documentation of member progress against goals with each member contact;
g) Achievement of goals, revision of goals or goal dates, if applicable;
h) Documentation of progress toward self-management;
i) A schedule for follow-up and communication with the member, including the development and discussion of their self-management plan. This will also include the date for next follow-up, mode for follow-up (phone, in-person) and the reason for follow-up;
j) Assessment of medication adherence;
k) Documentation of any follow-up after a hospitalization;
l) Documented outcomes achieved by the member and estimated case savings at the close of the case, if applicable; and
m) Documentation of referrals to resources and follow-up to determine if member acted on referral(s).

In addition, members enrolled in Complex Case Management must have at least one (1) PCP face-to-face visit with a physician every six (6) months.

For members identified with Behavioral Health or Substance Use Disorder needs, the CM will assess if the member has a Release of Information (ROI), allowing coordination of care between the BH and PCP providers. If the member does not have a ROI, the CM will attempt to facilitate the process to promote communication, coordination of care, treatment compliance and optimal health benefits. For those members with ongoing opioid prescriptions for chronic conditions, an opioid patient contract is on file in the Electronic Health Record.

IV. Case Closure
When a member’s Complex Case Management goals have been met or progress is no longer anticipated, the Case Manager should close the case. The member may then be followed in the IPA Condition Management Programs, if appropriate. The case must also be closed upon member request
(Opt-Out) or if the member does not respond to CCM Monthly Contacts for more than two (2) consecutive months (It will be assumed that the member wished to Opt-Out, and will need to be documented as such). The Case Manager must document the date and reason(s) for the closure of the case. This includes documenting the status of all goals and whether they were achieved. There must be documentation that the member was notified that their case was closed.

A random sample of Complex Case Management files will be audited, at minimum, for the following elements:

a) Monthly submission of members enrolled in the CCM Program;
b) Members appropriately stratified in Case Management rather than Complex Case Management;
c) Timeframes Met (IA, Monthly Contact);
d) Appropriate Goal Setting (Follow-Up, Member Self-Management Goal, SMART Goal format);
e) Assessment of Barriers to Achievement of Goals;
f) Assessment of Member Benefits;
g) Assessment of Community Resources and findings incorporated into the Care Plan;
h) Assessment of Social Determinants of Health and findings incorporated into the Care Plan;
i) Transition of Care (TOC) Calls made within 48 hours of discharge (all cause) when hospitalized;
j) Eligible members (Condition Management Tiers 1 and 2 and CCM) who keep a follow-up appointment with PCP or Specialist within 7 days of discharge from the hospital.
APPENDIX A: 2019 Complex Case Management Guidelines

These guidelines offer suggestions for members who may be appropriate for referral to Complex Case Management (CCM) services based not solely on their condition but also the Complexity level, and/or Psychosocial needs of the member. The organization coordinates services for its highest risk members with complex conditions and helps them access needed resources.

**Note the following:**

a) The IPA must provide clear documentation in the complex case management care plan the clinical rationale for the member’s complexity and need for CCM;
b) The PCP’s support of member’s CCM need and care plan must be documented; and
c) The care plan interventions must support the member’s Complex Case Management needs.

All Retail HMO members receiving Private Duty Nursing (PDN) services must be enrolled in the IPA’s Complex Case Management Program.

<table>
<thead>
<tr>
<th>Multiple ChronicConditions</th>
<th>Chronic medical or mental health conditions with complex needs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Complex Medical Conditions</td>
<td>MVA, trauma, or current medical condition with multiple challenges</td>
</tr>
<tr>
<td>Air Transport</td>
<td></td>
</tr>
<tr>
<td>Transplant</td>
<td>Pre-and Post-Transplant Care</td>
</tr>
<tr>
<td>Acute Hospital Admissions</td>
<td>Unplanned in recent 12 months + Complex need, LOS &gt;14 days</td>
</tr>
<tr>
<td>High-Risk Hospital Discharges</td>
<td>Complex needs post discharge (DME, multiple therapies, psych-social and medical issues)</td>
</tr>
<tr>
<td>Emergency Dept. Visits</td>
<td>At least 3 in past 12 months</td>
</tr>
<tr>
<td>Multiple admissions</td>
<td>3 unplanned inpatient admissions within 6 months for the same or related condition (exclude scheduled chemotherapy)</td>
</tr>
<tr>
<td>Mental Health Admissions (Acute or Residential)</td>
<td>At least 2 in past 12 months</td>
</tr>
<tr>
<td>Mental Health Re-admission</td>
<td>Re-admission within 30 days</td>
</tr>
<tr>
<td>Substance Use Disorder Admissions (Acute or Residential)</td>
<td>At least 2 in past 12 months</td>
</tr>
</tbody>
</table>

**Specific Diagnoses**

- **Advanced Rheumatologic Disease**: Services rendered in an Infusion Center
- **Amyotrophic Lateral Sclerosis (ALS)**: Symptoms that affect ADLs
- **Anorexia Nervosa or Bulimia**: Admission to acute hospital or residential
- **Burns**: Severity of 2nd degree and higher with a total body burn of > 20% in adults & > 10% in children under eighteen (18) years of age
- **Cancer**: Metastatic End-Stage
- **Chronic Kidney Disease**: Stage 4 or 5
- **Chronic Obstructive Pulmonary Disease**: Edema or oxygen-dependent
- **Complex Wound Care**: Wound Vacuum & Stage III, IV
- **Diabetes Mellitus**: Complications including neuropathy, retinopathy or nephropathy that have a substantial impact on ADLs, newly diagnosed renal failure, new amputation and/or HbA1c 10 or greater.
- **End of Life Care**: Hospice, Advance Directives, Living Will
- **High Risk Obstetric and Neonatal care**: Premature infants discharge planning until stable at home, multiple gestation
- **HIV/AIDS/ARC**: Complications
- **Multiple Sclerosis**: Symptoms that are starting to affect ADLs
- **Paraplegia or Quadriplegia**: Recent-onset or complications
- **Sickle Cell Disease**: Onset and/or Exacerbation
- **Stroke**: Acute onset until rehab completed
- **Suicide attempt**: Serious attempt
- **Transgender**: Individuals starting the transgender process
- **Traumatic brain Injury**: Acute onset until rehab completed
## APPENDIX B: 2019 Utilization Management Timeframe Requirements

### (Commercial and Retail HMO lines of business)

<table>
<thead>
<tr>
<th>MEDICAL AND BEHAVIORAL HEALTH UM DECISION TYPE</th>
<th>UM DECISION MAKING TIME FRAME</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Commercial/Retail:</strong></td>
<td></td>
</tr>
<tr>
<td>Non-urgent Pre-certification/Pre-Service</td>
<td>Within 5 calendar days of receipt of request, including the collection of all necessary information (no additional time is allowed for obtaining information), including notification to practitioner and member.</td>
</tr>
<tr>
<td>Requests including Specialist Referrals</td>
<td></td>
</tr>
<tr>
<td><em>(approval and denial)</em></td>
<td></td>
</tr>
<tr>
<td>Urgent Pre-certification/Pre-Service includes</td>
<td>Within 72 hours of receipt of request, including the collection of all necessary information (no additional time is allowed for obtaining information), including notification to practitioner and member.</td>
</tr>
<tr>
<td>Specialist Referrals <em>(approval and denial)</em></td>
<td></td>
</tr>
<tr>
<td>Certification and Initial Review Process for</td>
<td>Within 24 hours of receipt of the request, including notification to practitioner and member.</td>
</tr>
<tr>
<td>emergent admissions <em>(approval and denial)</em></td>
<td></td>
</tr>
<tr>
<td>Concurrent <em>(approval and denial)</em></td>
<td>Within 24 hours of receipt of request, notification of practitioner(s) within 24-hour timeframe. If the IPA states in their UM Plan that the practitioner may assume approval of continued stay unless they are informed otherwise, then the practitioner does not need to be notified of continued stay approval. Excludes those identified by the IPA as not requiring review. Include additional criteria used in decision-making.</td>
</tr>
<tr>
<td>Retrospective/Post-service</td>
<td>Within 30 (thirty) calendar days of receipt of the request. If the decision results in a denial, the member and practitioner(s) must be notified in writing by mail, fax, or e-mail within 30 calendar days of the receipt of request Member <strong>should not be sent a denial letter when services have already been delivered in an inpatient setting.</strong></td>
</tr>
<tr>
<td>Appeals</td>
<td><strong>Not delegated to the IPA’s for any line of business</strong> Refer to the language included in the specific denial letter.</td>
</tr>
<tr>
<td>Member Complaints</td>
<td><strong>Not delegated to the IPA’s for any line of business</strong> Resolution as soon as possible, but no greater than 30 calendar days from receipt. Complaints may be discussed in a summary format using categories of complaints, such as: Access, CM, PCP issues, etc. Trends must be identified and discussed by the IPA UM/QI Committee.</td>
</tr>
</tbody>
</table>
# APPENDIX C: HMO and Delegate Responsibility Matrix (UM & Population Health Management)

## BCBSIL HMO Utilization Management Delegation Matrix

<table>
<thead>
<tr>
<th>Delegated Activity</th>
<th>Health Plan Responsibilities</th>
<th>Delegate Responsibilities</th>
<th>Delegate Reporting Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Program Structure</strong></td>
<td>Health Plan retains accountability for the structure of the UM Program, including the HMO Program Description. HMO ensures the involvement of HMO Medical Directors in design and structure of the UM program. The Health Plan is not responsible for any medical necessity decisions. Delegation oversight activities are reported at Health Plan UM Workgroup and Health Plan Quality Improvement Committee.</td>
<td>Delegate will develop its own Utilization Management and Population Health Management Plan and submit to the Health Plan for approval annually. Delegate will implement its UM Program, in alignment with Health Plan UM Program structure.</td>
<td>Annually, the delegate will provide HP with the delegates UM Program Description, policies and procedures, and required ‘UM Plan Attachments’ relating to all delegated functions.</td>
</tr>
<tr>
<td><strong>Clinical Criteria for UM Decisions</strong></td>
<td>The HMO delegates the selection, annual review, application and dissemination of nationally recognized clinical criteria to the IPA. HMO Clinical Practice guidelines are available to additionally assist Delegate in making determinations.</td>
<td>Delegate maintains responsibility for selection of nationally recognized clinical criteria (including behavioral health and substance use disorder), the development of additional UM criteria, if necessary and for informing all practitioners of the availability of criteria upon request. Delegate will evaluate consistency in the application of UM criteria for all staff involved in the UM process semi-annually.</td>
<td>Annually, Delegate will provide evidence of notice sent to practitioners advising about the availability of criteria.</td>
</tr>
<tr>
<td><strong>Communication Services</strong></td>
<td>HMO delegates responsibility of notification of members and practitioners regarding access to UM staff for questions related to UM. HMO will post a letter on the HMO website describing all programs available to the member.</td>
<td>Delegate maintains responsibility for notification of members and practitioners regarding access to UM staff for questions about UM. Delegate maintains responsibility for notifying members of all programs available to them.</td>
<td>IPA will provide evidence of notices on an annual basis.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>IPA will post a letter describing all programs available to the member.</td>
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</tr>
<tr>
<td>Delegated Activity</td>
<td>Health Plan Responsibilities</td>
<td>Delegate Responsibilities</td>
<td>Delegate Reporting Requirements</td>
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</tbody>
</table>
| **Appropriate Professionals** | HP delegates the policies and procedure requirements for:  
  -Appropriate Use of Professionals for UM Decision Making  
  -Denials and Adverse Determinations, including Benefit Denials.  
  -Use of Board-certified Specialists  
  -Notification of Staff, Members, and Providers of its Affirmation Statement on an annual basis. | Delegate ensures that all UM decisions are made by appropriate professionals, per HP policies. This includes all medical and behavioral health determinations.  
Delegate will ensure that board-certified consultants are used, as needed, for medical necessity decisions, following HP policies  
Delegate will notify its own staff, existing and newly employed practitioners, and new members of its affirmative statement regarding incentives. | None. |
| **Timeliness of UM Decisions** | HMO monitors Delegate Timeliness of UM Decisions. This is done through oversight of adverse determination timeframes on a monthly basis, and review of Delegate Inter-Rater Reliability Adherence to Timeframe Audits. | Delegate will ensure that all UM decisions (medical and behavioral health) are made within NCQA timeliness standards (as defined by the current standards year). Delegate maintains responsibility for timeliness of all (approved, denied and case closed) UM decisions. | Adherence to Timeframe Audits must be conducted and documented as having been discussed in the UM/QI Committee Meeting Minutes.  
Reports are to be submitted semi-annually to the HMO Provider Portal. |
<p>| <strong>Clinical Information</strong> | Health Plan does not make any medical necessity decisions based on clinical information. | Delegate will ensure that all UM decisions (medical and behavioral health) are made with appropriate clinical information. | None. |</p>
<table>
<thead>
<tr>
<th>Delegated Activity</th>
<th>Health Plan Responsibilities</th>
<th>Delegate Responsibilities</th>
<th>Delegate Reporting Requirements</th>
</tr>
</thead>
</table>
| Denial Notices     | The HMO conducts monthly oversight of Delegate Denials and provides feedback and education and requests for corrective action as needed. | Delegate is responsible for ensuring the following for all denials notices (medical and behavioral health):  
  - The right to discuss the denial with a reviewer  
  - Written notification to the member and practitioner of the reason for denial in easy to understand language and specific to the member  
  - The specific criteria used to make the decision  
  - The right to obtain a copy of the criteria upon request.  
  - Appeal rights, including timeframes to appeal, timeframes for completing the review, and member rights to submit documentation, be represented, IRO review and how to use state department of insurance to support them in the appeal.  
  - A member non-discrimination notice should be provided with all medical group approvals and denials pursuant to Section 1557 of the Affordable Care Act. | Quarterly report of Denials which includes:  
  - Total number of denials by type |
| Appeals            | HP maintains accountability for all first and second level member appeals, including maintenance of appeals policies and procedures. | Delegate is responsible for informing members regarding appeal rights. Appeal rights are included in the denial letter. Delegate must also explain member appeal rights in the New Member Welcome Letter. | None. |
### BCBSIL HMO Utilization Management Delegation Matrix

<table>
<thead>
<tr>
<th>Delegated Activity</th>
<th>Health Plan Responsibilities</th>
<th>Delegate Responsibilities</th>
<th>Delegate Reporting Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Evaluation of New Technology</strong></td>
<td>HP maintains accountability for evaluation of all new technology for incorporation as a benefit.</td>
<td>To contact the HP for information related to New Technology benefit requests.</td>
<td>None.</td>
</tr>
<tr>
<td><strong>Procedures for Pharmaceutical Management</strong></td>
<td>HP delegates Pharmacy Benefit Management to Prime Therapeutics.</td>
<td>None.</td>
<td>None.</td>
</tr>
<tr>
<td><strong>Triage and Referral for BH Management</strong></td>
<td>The HMO delegates BH triage and Referral to the IPAs.</td>
<td>IPAs must describe their process for members requesting BH services (which include mental health and Substance Use Disorder); including written standards for ensuring appropriate BH triage and referral decisions.</td>
<td>Any delegated BH Organization or IPA providing BH Services with a centralized triage and referral process must submit telephone reports quarterly to the HMO.</td>
</tr>
<tr>
<td><strong>Oversight of Delegated Activities</strong></td>
<td>HP reviews Delegate UM activity monthly, quarterly, semi-annually and annually as outlined in the MSA and the HMO UM and Population Health Plan. The HMO provides feedback, educational interventions and/or requests for corrective action for any deficiencies identified.</td>
<td>Delegate shall cooperate and fully participate in audits, site visits and other monitoring of delegated activities conducted by the HP. Deficiencies and Corrective Action Plan: In the event deficiencies are noted during audit or within required report submissions, delegate shall develop a corrective action plan for the specific Delegated Activity that is determined by HP to be deficient, and which shall include specifics of and timelines for correcting the deficiency, and shall be provided to HP within 30 calendar days of HP report of its findings. The corrective action plan shall be implemented by delegate within the specified timeframes listed therein.</td>
<td>Annually, the delegate will provide HP its Utilization Management and Population Health Management Program Description as well as their policies and procedures. Annually, the delegate will provide HP with all documents required to conduct the annual audit of the UM and Population Health Management Program.</td>
</tr>
<tr>
<td>Delegated Activity</td>
<td>Health Plan Responsibilities</td>
<td>Delegate Responsibilities</td>
<td>Delegate Reporting Requirements</td>
</tr>
<tr>
<td>----------------------------</td>
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</tr>
</tbody>
</table>
| **Strategy Description**   | The Health Plan has a comprehensive strategy for Population Health Management. This program will address goals and population targeted in the following four areas of focus:  
  - Keeping members healthy (Wellness & Prevention Program)  
  - Managing members with emerging risk (Condition Management Program)  
  - Patient safety or outcomes across settings (Case Management Program)  
  - Managing multiple chronic illness (Complex Case Management Program)  
  The strategy describes:  
  - Goals and populations targeted for each of the four areas of focus (above).  
  - Program or services offered to members. | The delegate will perform the operational components required to carry out the delegated PHM Program Strategy. |                                                            |
| **Informing Members**      | HMO delegates responsibility of informing members eligible for programs that include interactive contact.  
  HMO will post a letter on the HMO website describing all programs available to the member. | Delegate maintains responsibility for informing members eligible for programs that include interactive contact regarding:  
  - How members become eligible to participate  
  - How to use program services  
  - How to opt out of the program  
  Delegate maintains responsibility for notifying members of all programs available to them. | IPA will post a letter describing all programs available to the member. |
**Population Health Management (PHM) Program**

The Complex Case Management (CCM); Case Management (CM); Condition Management and Wellness and Prevention Programs are integrated components of the overall HMO PHM Strategy and the PHM Program.

<table>
<thead>
<tr>
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</thead>
</table>
| **Population Identification**       | Health Plan will provide the delegate with a predictive list of members eligible for the Population Health Management Program on an annual basis.  
The Health Plan integrates the following data to use in the predictive model:  
- Medical and BH claims or encounter data  
- Pharmacy Claims  
- Lab results and/or Electronic health records  
- Health Appraisal results  
- Health services programs within the organization | Monthly, Delegate will identify members for the Population Health Management Program from referral sources (PCP, UM Process, and/or Member Self-Referral). | Monthly submission of Population Health Referral Sources will be posted to the Provider Portal. |
| **Population Assessment & Risk Stratification** | Health Plan will annually assess the characteristics and needs, including social determinants of health, of its member population and relevant sub-populations including children, adolescents, members with disabilities and members with Serious and Persistent Mental Illness (SPMI).  
The health plan defines the PHM risk stratification strategy and methodology.  
At minimum, the Health Plan will report on the number of eligible members for services in each of the PHM programs for which they are eligible on an annual basis. | Delegate will discuss the population health assessment provided by the health plan and discuss the relevance related to the delegates specific population on annual basis.  
IPA will document discussion of assessment and update program activities and resources to address member needs.  
IPA to review community resources for integration into program offerings to address member needs.  
IPA will stratify their members into Health Plan PHM program tiers. | Annual documentation of discussion and interventions will be reported in the delegates UM/QI Committee meeting minutes. |
### Population Health Management (PHM) Program* --Partially Delegated Program

*The Complex Case Management (CCM); Case Management (CM); Condition Management and Wellness and Prevention Programs are integrated components of the overall HMO PHM Strategy and the PHM Program.

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td><strong>PHM Program Delivery Supports</strong></td>
<td>The Health Plan will work with practitioners and providers to achieve population health management goals. This includes the sharing of data and offering shared-decision making aids to its delegates. The Health Plan offers its delegates value-based payment (VBP) arrangements.</td>
<td>None.</td>
<td></td>
</tr>
<tr>
<td><strong>Wellness and Prevention</strong></td>
<td>The Health Plan offers Health Risk Appraisals and self-management tools to their members. Member Health Risk Appraisal results will be integrated with additional data utilized to provide predictive modeling reports to the delegate.</td>
<td>Health Risk Appraisals are not delegated to the IPA.</td>
<td>The IPA will manage members identified in the Population Health Management Wellness and Prevention Program.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>The IPA will screen members:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>-Ages 3-17 for BMI and Counseling for Nutrition and Physical Activity</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>-ALL members ≥ 12 years of age for depression who do not have a diagnosis of depression or dysthymia. This is completed during a face-to-face visit.</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>-A signed (by physician and member) opioid contract for members who are prescribed narcotic pain relievers for chronic pain or conditions. The contract is documented in the patient EHR.</td>
</tr>
</tbody>
</table>
| **Access to Case Management**       | Health Plan provides integrated data reports to the IPA to identify potential candidates for Complex Case Management, and delegates the monthly identification of members via referral sources to the IPA. | Monthly, Delegate will identify members to be considered for the Complex Case Management Program. Referral sources to include:  
- Medical Management program referral  
- Discharge planner referral  
- Member or caregiver referral  
- Practitioner referral | Monthly referral sources uploaded to the HMO Provider Portal.
If there are not any referral sources for the month, the log must still be uploaded stating “None”. |
**Population Health Management (PHM) Program** --Partially Delegated Program

*The Complex Case Management (CCM); Case Management (CM); Condition Management and Wellness and Prevention Programs are integrated components of the overall HMO PHM Strategy and the PHM Program.*

<table>
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</thead>
</table>
| **Case Management Systems**         | Health Plan Provides a Complex Case Management Documentation Platform to delegate via the HMO Provider Portal. | Delegate will manage members eligible for Complex Case Management within the HMO Provider Portal. Delegate will utilize the following to manage the members in Complex Case Management:  
  - Evidence-based clinical guidelines or algorithms to conduct assessment and management.  
  - Automated prompts for follow-up, as required by the case management plan. (IPA may use Outlook, or their own EMR’s to meet this requirement)  
  - Automatic documentation of staff ID, and the date and time of action on the case or when interaction with the member occurred. | Documented materials demonstrating the evidence based clinical guidelines or algorithms used for assessment and management of members in Complex Case Management.  
Documented procedure for automated prompts to remind staff of next follow-up interaction. |
| **Experience with Case Management** | Annually, the Health Plan evaluates experience with its Complex Case Management program and Population Health Management Program by:  
  - Obtaining feedback from members.  
  - Analyzing member complaints.  
The Health Plan analyzes participant survey feedback on the CCM and PHM Programs and shares the results with the delegate. | Delegate maintains accountability for review and management of all member complaints.  
  - Any complaints regarding the delegate’s CCM Program and Population Health Management Programs will be forwarded to the Health Plan via the HMO Provider Portal. | Document discussion of results of the Health Plan member satisfaction survey in UM/QI Committee minutes on an annual basis.  
Monthly submission of all member complaints. Member complaints are submitted to the Provider Portal within 1 business day of receiving the complaint. |
<p>| <strong>PHM Impact Analysis</strong>             | Annually, the HMO monitors the Effectiveness of the PHM Program. Results of the analyses are used to shape the PHM strategy and goals for the subsequent year. | Annually, the delegate must discuss HMO results of effectiveness of the PHM Program and incorporate improvements into their IPA’s UM and Population Health Management Plan in subsequent years. | Document discussion of PHM Program Effectiveness in the UM/QI Committee on an annual basis. |</p>
<table>
<thead>
<tr>
<th>Delegated Activity</th>
<th>Health Plan Responsibilities</th>
<th>Delegate Responsibilities</th>
<th>Delegate Reporting Requirements</th>
</tr>
</thead>
</table>
| Improvement and Action             | The Health Plan uses results from the PHM impact analysis to annually identify opportunities for improvement and act on at least one opportunity. | Based on Health Plan results of measuring the experience with CCM and satisfaction of the PHM programs, the delegate:  
  - Implements one intervention to improve *clinical* performance  
  - Implements one intervention to improve *member* experience | Submits required semi-annual reporting requirements to the health plan (see UM and Population Health Management Plan)  
  Discusses and documents CCM and Population Health interventions annually in the UM/QI Committee Meeting Minutes. |
| Oversight of Delegated PHM Activities | Health Plan will conduct an annual review of PHM Program Description or policies/procedures for all PHM program activities.  
The Health Plan will perform pre-delegation assessments to evaluate new delegates capacity to meet NCQA requirements before delegation begins.  
The Health Plan evaluates semiannual and annual reporting and performance of the delegate. The health plan will describe its process for evaluating the delegates performance and describes remedies if the delegated entity does not fulfill its obligations, including revocation of the delegation agreement, if necessary. | Delegate shall cooperate and fully participate in audits, site visits and other monitoring of delegated activities conducted by the HP. | Annually, the delegate will provide HP its PHM Program Description, required policies and procedures and other required reports, documents and materials as requested by the Health Plan. |
<table>
<thead>
<tr>
<th>Area of Focus</th>
<th>Program/Service</th>
<th>Targeted Population</th>
<th>Measurable Goal</th>
<th>Type of Member Interaction (Phone, In-Person, Online)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Managing Multiple Chronic Conditions</td>
<td>Complex Case Management</td>
<td>Members with Significant Illness or Utilization of Services (See Appendix A: 2019 Complex Case Management Referral Guidelines)</td>
<td>Compare Inpatient Admission Rates and ER Rates for members in CCM vs. those not in CCM for top 3 common diagnoses in both cohorts. &gt;90% of members satisfied with Complex Case Management Program</td>
<td>Phone and/or In-Person (Interactive Contact)</td>
</tr>
<tr>
<td>Managing Safety and Outcomes Across Settings</td>
<td>Case Management</td>
<td>Members Transitioning Care (TOC): Discharged from Acute Hospital Stay Members in CCM, CM, Condition Management: Discharged from Acute Hospital Stay Eligible members keep follow-up office visits with their PCP or Specialist (See UM Plan for specific criteria)</td>
<td>Achieve 30-Day All Cause Readmission Rate of 8.5% Commercial and Retail Case Management TOC call made within 48 hours of discharge, including documented Medication Reconciliation &gt;50% of eligible members are seen by their doctor within 7 days of discharge.</td>
<td>Phone and/or In-Person (Interactive Contact)</td>
</tr>
<tr>
<td>Managing Members with Emerging Risk</td>
<td>Condition Management - Asthma Condition Management Program *Tier 1 (Mild/Moderate Intermittent Asthma) *Tier 2 (Moderate/Severe Persistent Asthma)</td>
<td>Members with Asthma (See UM Plan for member eligibility criteria)</td>
<td>&gt;83% percent of HMO Members 5-85 years of age who were identified as having persistent asthma and had a ratio of controller medications to total asthma medications of 0.50 or greater</td>
<td>Phone and/or In-Person (Interactive Contact) Tier 2Mailings</td>
</tr>
<tr>
<td></td>
<td>Condition Management - Diabetes Condition Management Program *Tier 1 (HbA1c &lt;9) *Tier 2 (HbA1c &gt;9)</td>
<td>Members with Diabetes (See UM Plan for member eligibility criteria)</td>
<td>&gt;53% percent of HMO Members 5-85 years of age who were identified as having persistent asthma and were dispensed controller medication that they remained on for at least 75% of their treatment period &gt;90% of members have an Asthma Action Plan &gt;70% of members demonstrate Asthma Control (as evidenced by Asthma Control test) &gt;70% of members &gt;12 y/o have a depression screen performed &gt;85% of members &gt;12 y/o have a depression screen performed</td>
<td>Mailings Tier 1</td>
</tr>
<tr>
<td></td>
<td>Wellness and Prevention -Cancer Screening Program</td>
<td></td>
<td>HEDIS: Breast Cancer Screening ages 50-74 who had a mammogram &gt;77.25% of members who had Breast Cancer Screening</td>
<td>Mailings and/or Online Information</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>HEDIS: Cervical Cancer Screening ages 21-64 &gt;83% 78.5% of members who had Cervical Cancer Screening</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>HEDIS: Colorectal Screenings ages 51-75 with current screening &gt;80% 78% of members who had Colorectal Screening</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Well Child Care</td>
<td></td>
<td>BMI Percentile Height and Weight ≥ 88% of members who are 3-17 years of age</td>
<td>PCP Visit</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Counseling for Nutrition ≥ 75% of members who are 3-17 years of age</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Counseling for Physical Activity ≥ 81% of members who are 3-17 years of age</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Depression Screening</td>
<td>All members &gt; 12 years of age without a diagnosis of depression or dystymia</td>
<td>80% of members who are ≥ 12 years of age</td>
<td>PCP Face-to-Face</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>HEDIS definition: Current members who, during the 12-month window from November prior to October 31 of the contract year have a new episode of narcotic use, as defined by no prior narcotic prescriptions for 180 days prior to the new index prescription, for which the new episode lasts at least 31 days of a 62-day period following the dispensing of the index prescription; *Excludes members with cancer or sickle cell disease.</td>
<td>Prescribing Physician Visit</td>
</tr>
<tr>
<td></td>
<td>Opioid Contract Initiative</td>
<td></td>
<td>40% of members with an opioid contract on file in the EHR within 60 days of criteria for inclusion in the initiative</td>
<td></td>
</tr>
</tbody>
</table>
### APPENDIX E: 2019 Population Health Management Incentive Program Targets/Weights

<table>
<thead>
<tr>
<th>Performance Measure</th>
<th>Performance Target</th>
<th>Points Available</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Population Health:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Actively Promotes and Refers Members to Appropriate Community Resources</td>
<td>90%</td>
<td>8</td>
</tr>
<tr>
<td>CCM, CM, Condition Management Monthly Referral Source Reports</td>
<td>90%</td>
<td>6</td>
</tr>
<tr>
<td>Well Child Care-Counseling for Nutrition</td>
<td>75%</td>
<td>6</td>
</tr>
<tr>
<td>Monthly Submission of Population Health Enrollees</td>
<td>100%</td>
<td>6</td>
</tr>
<tr>
<td>Obtain Daily ER Logs from IPA Affiliated Hospitals</td>
<td>90%</td>
<td>6</td>
</tr>
<tr>
<td>Members Stratified Appropriately</td>
<td>90%</td>
<td>8</td>
</tr>
<tr>
<td>Transition of Care Call within 48 hrs. of hospitalization</td>
<td>90%</td>
<td>8</td>
</tr>
<tr>
<td>Member Satisfaction with CCM and Population Health Programs</td>
<td>90%</td>
<td>8</td>
</tr>
<tr>
<td>Depression Screening (all members &gt;12 y/o without diagnosis of depression or dysthymia)</td>
<td>80%</td>
<td>7</td>
</tr>
<tr>
<td>Chronic Opioid Prescribing: Patient contract on file in EMR</td>
<td>40%</td>
<td>4</td>
</tr>
<tr>
<td><strong>Complex Case Management File Review:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Timeframes Met (IA, Monthly Contacts)</td>
<td>90%</td>
<td>8</td>
</tr>
<tr>
<td>Goal Setting (Follow-Up, Member Self-Management Goal, SMART Goals)</td>
<td>90%</td>
<td>8</td>
</tr>
<tr>
<td>Assessment of Barriers to Achievement of Goals</td>
<td>90%</td>
<td>2 4</td>
</tr>
<tr>
<td>Social Determinants of Health incorporated into CCM Care Plan</td>
<td>90%</td>
<td>6</td>
</tr>
<tr>
<td>Assessment of Community Resources</td>
<td>90%</td>
<td>2 4</td>
</tr>
<tr>
<td><strong>Asthma Condition Management Program:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asthma Action Plan</td>
<td>90%</td>
<td>5</td>
</tr>
<tr>
<td>Asthma Control (Evidenced by an Asthma Control Test)</td>
<td>70%</td>
<td>5</td>
</tr>
<tr>
<td>QI Admin. Measure: Medication Mgmt. for People with Asthma</td>
<td>53.51%</td>
<td>2.5</td>
</tr>
<tr>
<td>QI Admin. Measure: Asthma Medication Ratio</td>
<td>81.75%</td>
<td>2.5</td>
</tr>
<tr>
<td>Depression Screening (&gt;12 years of age)</td>
<td>70%</td>
<td>5</td>
</tr>
<tr>
<td><strong>Diabetes Condition Management Program:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HbA1C &lt; 8</td>
<td>7 69%</td>
<td>5</td>
</tr>
<tr>
<td>Depression Screening (&gt;12 years of age)</td>
<td>85%</td>
<td>5</td>
</tr>
<tr>
<td>TOTAL POINTS</td>
<td></td>
<td>100</td>
</tr>
</tbody>
</table>

- **Case Management and Complex Case Management** scoring is inclusive of all members enrolled in the program at any time throughout the year.

- **Condition Management** scoring is inclusive of all Tier 2 members enrolled in the program any time throughout the year, with the following three exceptions which include all members enrolled in Tier 1 and Tier 2 of the program:

  - Asthma: Medication Mgmt. for People with Asthma **and** Asthma Medication Ratio
  
  - Diabetes: HbA1C ≤ 8 for Diabetics