

SWMBH Operating Policy 4.2

Subject: Utilization Management		Accountability: Utilization Management	Effective Date: 01/01/2014	Pages: 4
REQUIRED BY: BBA Section <u>42 CFR 438 Subparts B, C, D, F</u> PIHP Contract Section: <u>Part II (A): 4.11: Denials By A Qualified Professional; 4:12 Utilization Management Incentives, 7.10: Service and Utilization Management; Attachment 7.9.1: QAPI Programs for Specialty PIHP's; Attachment 6.3.1.: G&A Technical Requirements</u> NCQA Standard <u>UM 1 A-D, 2 A-C, 3, 4 A-B, D-F</u> SUD _____ Other _____			Last Reviewed Date: 6/5/17	Past Reviewed Dates: 01/07/15 12/18/14 3/21/16
LINE OF BUSINESS: <input checked="" type="checkbox"/> Specialty Waiver (B/C) <input checked="" type="checkbox"/> 1115 Waiver <input checked="" type="checkbox"/> Healthy Michigan Plan <input checked="" type="checkbox"/> SUD Medicaid <input checked="" type="checkbox"/> SUD Block Grant <input type="checkbox"/> MI Health Link <input type="checkbox"/> OTHER: _____	APPLICATION: <input checked="" type="checkbox"/> SWMBH Staff and Ops <input checked="" type="checkbox"/> Participant CMHSPs <input checked="" type="checkbox"/> SUD Providers <input checked="" type="checkbox"/> MH / DD providers <input type="checkbox"/> Other: _____		Last Revised Date: 6/5/17	Past Revised Dates: 01/07/15 12/18/14 3/21/16
Approved : <i>B. G. Rose</i> <i>Kimberly Larson</i> Date: <i>6/8/17</i>		Required Reviewer: Medical Director Director of UM and ME Chief Clinical Officer		

I. Purpose

To establish the standards and guidelines that detail how Southwest Michigan Behavioral Health (SWMBH) and its provider network system comply with the federal laws and Michigan Department of Health and Human Services (MDHHS) Contract requirements pertaining to the Utilization Management (UM) responsibilities of SWMBH.

II. Policy

It shall be the policy of SWMBH to have a comprehensive UM Program that meets the regulatory requirements of the MDHHS Specialty Services Contract, and Centers for Medicare and Medicaid Services Code of Federal Regulations (CFR). The purpose of the UM Program is to provide a comprehensive integrated process that ensures persons served by the SWMBH and its provider network receive high quality timely, medically necessary and clinically appropriate behavioral healthcare in the most cost effective manner with uniform benefit application.

III. Standards and Guidelines

A. Program Oversight, Governance and Authority

The SWMBH Utilization Management Program shall operate under the oversight of the SWMBH Medical Director, Chief Clinical Officer, and Director of Utilization Management and Member Engagement.

B. Regional Utilization Management/Clinical Practices

SWMBH shall maintain a Regional UM and Clinical Practices Committee (RUMCP), consisting of both SWMBH and clinical representatives. The RUMCP shall serve in a support and advisory capacity to the UM Program.

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C. Program Components

SWMBH's UM Program shall consist of the following four components:

1. Access and Eligibility
2. Service Authorization and Reauthorization
3. Utilization Review (UR)
4. Clinical Protocol

D. Program Structure

The written UM Program description shall describe the program structure, accountability lines, lead staff, involvement of practitioners in its development, implementation of behavioral healthcare practitioners in its implementation and that SWMBH does not provide financial incentives, reimbursements or bonuses, to staff or providers, based on customer utilization of covered services.

E. QAPI Interface

The UM Program shall operate as a sub-component of the SWMBH Quality Assessment and Performance Improvement Plan (QAPI). As required by MDHHS Contract, the UM Program must have a written plan and address mechanisms to address over/under utilization and prospective, concurrent and retrospective review processes.

F. Annual Program Evaluation

SWMBH shall clearly demonstrate that it has annually evaluated the UM Program, addressed trends, made systemic changes as indicated and has updated the UM Plan to reflect current need, as necessary.

G. Satisfaction with the UM Process

SWMBH, through various avenues including stakeholder satisfaction surveys and customer services, shall have a mechanism for tracking feedback regarding satisfaction with the UM Process from customers and providers.

H. SWMBH Staff Roles

The UM Program description shall clearly designate the SWMBH practitioners involved in the implementation, supervision, oversight and evaluation of the UM program.

I. Program Information Sources

In implementing the annual UM Program Plan, the SWMBH UM care management reviewers will use the publicly available clinical practice guidelines in conducting their reviews of the various clinical components of the SWMBH plan. These include contractually identified practice guidelines, MDHHS public policy guidelines, technical advisories, nationally recognized medical necessity criteria and clinical practice guidelines (CPG's).

J. Care Management Review Mechanisms

The SWMBH Annual UM Program Description/Plan shall include care management review mechanisms that addresses all of the regulatory compliant and policy driven functions. SWMBH will assure inter-rater reliability related to SWMBH policy and criteria annually as identified through the Consistency in Applying Criteria policy.

K. UM Decision-Making Criteria

SWMBH shall use medical necessity written criteria based upon sound clinical evidence and specifics procedures for appropriately applying the criteria to make utilization.

L. Service Authorizations

SWMBH shall have UM review criteria that reviews utilization management decisions being made across its network for consistency and alignment with its clinical practice guidelines. In this regard, the UM Care Management Review team shall ensure, through its sampling reviews of the UM program, that all regulatory, statutory and policy requirements are met. Service determinations resulting in denials are made by appropriately licensed and credentialed staff. SWMBH does not

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provide financial incentives, reimbursements or bonuses, to staff or providers, based on customer utilization of covered services.

M. Level of Care Decisions

Level of Care UM decisions shall be based on the standardized SWMBH policy developed from the MDHHS Specialty Services Contract, Michigan Mental Health Code and Medicaid Provider Manual, medical necessity criteria, American Society of Addiction Medicine (ASAM) Level of Care Criteria, Child and Adolescent Functional Assessment Scale (CAFAS), Disability Living Allowance (DLA) 20, Supports Intensity Scale (SIS), and clinical practice guidelines. Level of care decisions shall only be made by qualified staff with the expertise to make decisions and are reviewed, as appropriate, through supervisory, peer case and random SWMBH UM review mechanisms. Service determinations resulting in denials are made by appropriately licensed and credentialed staff who have appropriate clinical expertise in treating the customer's condition. SWMBH does not provide financial incentives, reimbursements or bonuses, to staff or providers, based on customer utilization of covered services.

N. Authorization and Denial Review Criteria/Procedures

The SWMBH UM Care Managers shall consistently apply medical necessity criteria utilizing the policy driven criteria. Denial/appeal reviewers will review service authorization decisions rendered by UM Care Managers and service denial decisions. SWMBH does not provide financial incentives, reimbursements or bonuses to staff or providers, based on customer utilization of covered services. Reviewers do not have a subordinate reporting relationship to SWMBH staff making medical necessity or level of care determinations and decisions rendered are conflict free.

O. Practitioner Access to UM Decision Criteria

SWMBH ensures its customers and practitioners have access to all the utilization decision criteria used by the network, and have received information or training on the use of the criteria, and how to access it, as requested. Mechanisms to access criteria are identified in provider and customer handbooks.

P. Access to UM Staff to Discuss UM Issues

Organizational providers, practitioners and customers have access to staff to discuss UM criteria via the toll free UM or Customer Services and/or Michigan Relay 711 phone numbers. Information regarding how to access a UM reviewer is identified in provider and member handbooks. UM reviewers are available Mon-Fri 8AM to 8PM to discuss and process routine UM issues. Providers and customers have 24 hour availability to electronically submit requests and/or leave a voicemail. Additionally, interpreter services are made available to customers at no cost and critical documents as identified per Balanced Budget Act (BBA) and Social Security Act safe harbor thresholds, are translated.

Q. Appropriate UM Professionals

As identified via MDHHS contracts and BBA standards, SWMBH shall ensure that only qualified licensed professionals assess the clinical information used to support and oversee the UM decisions.

R. SWMBH Review Case Selection

Specific cases for UM Review are identified by SWMBH in accordance with the annual guidelines set forth in the UM Plan. In this regard, SWMBH may choose specific cases for review according to the UM Plan and may include random or targeted samples and cases of over and underutilization. In order to realize administrative efficiencies, SWMBH will complete 100% of Medicaid UM Reviews required by policy, contract and UM Plan.

S. UM Program Monitoring Results and Reporting

1. Results of UM Reviews will be aggregated in a common format and compared across the SWMBH region for improvement of service delivery and cost effectiveness and to address

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over and underutilization. Those will include recommended increases, decreases, changes or services that stay the same.

2. The Regional Utilization Management Clinical Practices (RUMCP) Committee will review all aggregated data on UM and service authorization trends on a regular basis. The efficacy of services, the quality of the services and supports as well as their cost-effectiveness will be assessed and decisions regarding improvements and needed changes in the system(s) will be discussed and reviewed.

T. Policies for Appeals

SWMBH shall maintain policies for service recipient appeals of UM decisions. These policies shall be maintained in the SWMBH Provider Policy Manual and posted on the SWMBH web site. SWMBH shall ensure there is a full and fair process for resolving service recipient disputes and responding to the person's request to reconsider a decision they find unacceptable regarding their care and services. The SWMBH appeal process shall address the regulatory and contractually mandated appeal and appeal related processes.

U. Delegation

If SWMBH delegates any UM functions contained in this policy guideline, SWMBH shall have a Delegation Agreement with the delegate entity that meets all the conditions of the SWMBH delegation policy guideline. SWMBH shall always maintain its oversight and monitoring responsibilities of all delegated UM functions, and shall annually evaluate the delegate entity, in accordance with the requirements outlined in the UM area Delegation Agreement.

IV. Definitions

See definitions section of policy manual/folder

V. Attachments

None