

ORGANIZATION POLICY AND PROCEDURE

 	Product Line: <input checked="" type="checkbox"/> Medicare <input checked="" type="checkbox"/> Medi-Cal <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> OTHER
Title: 08-01-16-51-00136 UM System Controls	
Division(s): Health Services	
Department(s): Utilization Management -	
Relevant Regulatory/Accrediting Agencies/Citations (specify): <input checked="" type="checkbox"/> CMS: 42 CFR 422.112(a)(3); Medicare Manual <input type="checkbox"/> DMHC: <input checked="" type="checkbox"/> NCQA-HP: UM 12 <input type="checkbox"/> NCQA-WHP: <input type="checkbox"/> OTHER:	
Approved by: President/Chief Medical Officer/Medical Director	Approval date: 06/24/2020 08/11/2022 Reviewed date: 01/10/2022 08/08/2022

SCOPE:

The Elite Care Health Organization Staff shall follow the procedures set forth in this policy.

PURPOSE:

To ensure that system control specifically for UM denial and appeal notification is being followed by ECHO staff

POLICY:

1. UM Denial System Controls
 - a. Date receipt for request is automatically recorded by the Ez-Cap system and changes cannot be made. All requests are submitted via portal by the Primary Care Physician office or Specialist office. Once the request is submitted Ez-Cap automatically records the time it was entered. Any request submitted via fax is tracked and entered with the

time the request was received via fax.

- b. Date of written notification are recorder manually consist with NCQA requirements. All letters are mailed out daily Monday- Friday by 5:00pm excluding holidays.
- c. Ez-Cap automatically records request receipt dates and times for authorization. Determination dates and times are automatically recorded as well. Changes in dates cannot be altered at any time. Management staff is only able to change expiration dates on authorization. Auth expiration dates are not locked down. Circumstance when this would be appropriate is when authorization has expired, and patient has not used authorization. Authorization can be 6 months out from approval date. This is the only time its permitted to edit an auth. UM Management and UM Coordinators each have a role and access levels which allow you to enter authorization, search and modify (ex: provider name or location, qty, CPT codes or diagnosis).
- d. No staff is allowed to modify dates for denials in the system. Only date modifications that are made in the system are for extension for Approved authorizations that are allowed by UM Coordinator and Nurses. Circumstance when this would be appropriate is when authorization has expired, and patient has not used authorization. Authorization can be 6 months out from approval date. Coordinators are able to make changes to authorization that are in the requested status. Once authorization has been reviewed and determination has been made no modification can be made to the authorization. UM Management and UM Coordinators each have a role and access levels which allow you to enter authorization, search and modify (ex: provider name or location, qty, CPT codes or diagnosis).
- e. System tracks any dates modification of any type through the audit trail feature. Ez-cap can track every time someone opens and makes any changes in the system. System can track the time and date and any changes that were made to the request. (Example anytime an authorization is opened, provider is changes, qty or CPT codes are modified)
- f. System security controls in place to protect data from unauthorized modification. Limiting physical access to the system. Only those who process request will be provided access. Each user is set up with access restriction to prevent unauthorized modification. Strong passwords are encouraged at time of onboarding new staff and providers and annual training is provided. Staff and providers are told avoid writing down passwords. Each user is set up with a unique user ID and password. Passwords are reset when requested by staff or if password is compromised. When employee leaves the company users accounts are disables by appropriate staff who oversee computer security.

- g. Biweekly reports are pulled from the audit trail tracking feature to monitor any modifications made to request by the UM Management. Reports will monitor to monitor accuracy of receipt dates, written notifications, verify if there were modifications to ensure security system controls continue to be in place.
- h. Quarterly audit of files using 8/30 methodology will be used to monitor and conducted by UM management.
- i. Incident Management: ECHO conducts a qualitative and quantitative analysis of all changes made to UM date entries. Report includes a summary of the total volume of date changes and categorizes the changes by reason. Reason codes are used to defined categories for the date changes. Report does not identify staff names or case numbers.
- j. Changes that did not meet the modification criteria: ECHO tracks and trends date changes that did not meet its policies and procedures as outlined in section D. ECHO conducts a qualitative analysis and presents its findings via a report.
- k. Actions: ECHO documents mitigation steps that will be taken or plans to take to address findings from section J. An action may be used to address more than one area of the audit findings. An internal investigation will be done. Interview will be conducted. Medical director will be notified. Intervention such as verbal warning with training, write up or termination depending on severity of violation.

Date	(Original, Reviewed, or Revised)
06/24/2020	Original
01/10/2022	Reviewed
08/09/2022	Reviewed