

JANUARY 2026

# Provider Manual

Highmark Wholecare D-SNP | Pennsylvania



Please visit [highmark.com/wholecare/medicare](http://highmark.com/wholecare/medicare)  
For inquiries, please call  
Provider Services at 1-800-685-5209



120 Fifth Avenue  
Pittsburgh, PA 15222

**How to Contact Highmark Wholecare D-SNP**  
1-800-685-5209 (TTY: 711)

**Provider Services Hours of Operation**  
Monday–Friday, 7 a.m.–5 p.m.

**How to Find Participating Providers  
or Pharmacies**  
[highmark.com/wholecare/medicare](http://highmark.com/wholecare/medicare)

Gateway Health Plan, Inc. d/b/a Highmark Wholecare is an independent licensee of the Blue Cross Blue Shield Association. Highmark Wholecare offers HMO plans with a Medicare Contract. Enrollment in these plans depends on contract renewal.

# Highmark Wholecare Medicare Assured 2026 Provider Manual

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## QUICK REFERENCE

### Important Phone Numbers for Highmark Wholecare Medicare Assured

<b>Call to Inquire about:</b>	<b>Call Type</b>	<b>Department/Area</b>	<b>Contact Information</b>	<b>Hours of Operation</b>
Claims Inquiry		Provider Services	1-800-685-5209	7:00 am to 5:00 pm Monday – Friday
Authorization Medical and Behavioral Health		Utilization Management	1-800-685-5209	8:30 am to 4:30 pm Monday – Friday  Calls received during non-business hours are referred to: 1-800-685-5209
Requests for admissions to inpatient rehab (IRF), Long-Term Acute Care (LTAC) or Skilled Nursing Facilities (SNF)		Utilization Management	<p>For urgent/emergent requests call 1-800-685-5209</p> <p><b>For expedited reviews, submissions via the NaviNet Provider Portal are strongly encouraged.</b></p> <p>Providers can also submit authorization requests via toll-free fax:</p> <p>General Prospective Review 1-833-559-2851</p> <p>Continued stay review for SNF/IRF/LTAC 1-833-559-2851</p>	8:00 am to 5:00 pm Monday – Friday

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<b><u>Call to Inquire about:</u></b>			
<b>Call Type</b>	<b>Department/Area</b>	<b>Contact Information</b>	<b>Hours of Operation</b>
<b>Authorizations for cardiology, physical, occupational and speech therapy, musculoskeletal surgery, interventional pain management procedures, and advanced outpatient imaging, which includes: CT/CTA, MRI/MRA/MRS, PET scans, myocardial perfusion imaging, and stress echocardiography</b>	HealthHelp	<p><a href="http://www.healthhelp.com/highmarkwholecare">www.healthhelp.com/highmarkwholecare</a></p> <p>Fax Standard: 1-877-637-6934 Fax Expedited: 1-877-637-6935 Phone: 1-888-265-0072</p>	<p>8:00 am to 8:00 pm Monday – Friday</p> <p>Website is available 24 hours a day 7 days a week</p>
<b>Authorizations for sleep studies and radiation oncology services</b>	HealthHelp	<p>Ordering providers can request authorization using one of the following methods:</p> <p>Web: <a href="http://www.healthhelp.com/highmarkwholecare">www.healthhelp.com/highmarkwholecare</a></p> <p>Fax Standard: 1-877-637-6934 Fax Expedited: 1-877-637-6935 Phone: 1-888-265-0072</p>	<p>8:00 am to 6:00 pm Monday – Friday</p> <p>After-hour requests may be submitted by fax or via web portal.</p>
<b>Member Eligibility</b>	Interactive Voice Response System (IVR) Member Eligibility Line	1-800-642-3515	<p>24 hours a day 7 days a week</p>
<b>Requests for Non-Formulary Drugs and Prior Authorizations</b>	Pharmacy Services	<p>1-800-685-5209 Fax: 1-888-447-4369 <a href="http://CoverMyMeds.com">Electronic prior authorizations at CoverMyMeds.com</a></p> <p>Our searchable drug formulary and prior authorization forms are available at <a href="https://www.highmark.com/wholecare">https://www.highmark.com/wholecare</a></p>	<p>8:00 am to 8:00 pm Monday – Friday</p> <p>Voicemail inbox is monitored 24 hours a day, 7 days a week for after-hours requests.</p>

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<b><u>Call to Inquire about:</u></b>			
<b>Call Type</b>	<b>Department/Area</b>	<b>Contact Information</b>	<b>Hours of Operation</b>
<b>Requests for chemotherapeutic drugs, symptom management drugs, and supportive agents</b>	OncoHealth	1-888-916-2616 <a href="mailto:clientsupport@oncohealth.us">clientsupport@oncohealth.us</a> <a href="http://www.oncohealth.us">www.oncohealth.us</a>	8:30 am to 7:00 pm Monday – Friday  8:30 am to 6:00 pm Saturday
<b>Expedited Redetermination</b>	Part D Prescriber Appeals	1-800-213-7083	Voicemail inbox is monitored 24 hours a day, 7 days a week for requests and status of redetermination requests
<b>Case Management</b>	Case Management	1-800-685-5209	8:30 am to 4:30 pm Monday – Friday
<b>MOM Matters® Maternity</b>	Case Management	1-800-685-5209 Fax ONAF to 1-888-225-2360	8:30 am to 4:30 pm Monday – Friday
<b>Preventive Health Services/ Member Outreach</b>	Preventive Health	1-800-685-5209 Fax: 1-888-225-2360	8:30 am to 4:30 pm Monday – Friday
<b>Member Complaints/Concerns/ Inquiries</b>	Member Services	1-800-685-5209	8:00 am to 8:00 pm Monday – Friday (April through September)  8:00 am to 8:00 pm 7 days/week (October through March)

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<b><u>Call to Inquire about:</u></b>			
<b>Call Type</b>	<b>Department/Area</b>	<b>Contact Information</b>	<b>Hours of Operation</b>
<b>Fraud, Waste and Abuse Concerns/Inquiries</b>	Fraud, Waste and Abuse	1-844-718-6400	24 hours a day 7 days a week
<b>Integrity and Compliance Concerns</b>	Compliance	1-844-718-6400 or email <a href="mailto:integrity@highmarkhealth.org">integrity@highmarkhealth.org</a>	24 hours a day 7 days a week
<b>General Privacy/Legal Concerns</b>	Privacy	<a href="mailto:privacy@highmarkhealth.org">privacy@highmarkhealth.org</a>	24 hours a day 7 days a week
<b>Report Suspected Privacy Breaches</b>	Integrated Risk and Privacy Operations (IRO)	<a href="mailto:integratedriskandprivacyops@highmarkhealth.org">integratedriskandprivacyops@highmarkhealth.org</a>	24 hours a day 7 days a week

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**Helpful Telephone Numbers**

<b><u>Call to Inquire about:</u></b>	<b>Contact Information</b>	<b>Hours of Operation</b>
<b>Call Type</b>		
<b>Highmark Wholecare TTY/TDD</b> Provides assistance with hearing impaired	1-800-654-5984 or TTY: 711	8:00 am to 8:00 pm Monday – Friday
<b>Practice Change Information</b>	Fax: 1-855-451-6680 <a href="#">Practice Change Request Form</a>	24 hours a day 7 days a week
<b>VSP Provider Servicing</b>	1-800-615-1883	Monday - Saturday 9 a.m. to 8 p.m.
<b>United Concordia Government Business Operations (Provider Services)</b>	1-866-568-5467	8:00 am to 5:00 pm Monday – Friday
<b>TruHearing Provider Support</b>	1-866-581-9462	8:00 am to 8:00 pm Monday – Friday
<b>Fitness</b>	1-833-423-4632	8:00 am to 8:00 pm Monday – Friday

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<b><u>Call to Inquire about:</u></b>	<b>Contact Information</b>	<b>Hours of Operation</b>
<b>Call Type</b>		
<b>Transportation Services</b>	1-877-797-0339 or TTY: 711	8:00 am to 5:00 pm Monday – Friday 9:00 am to 1:00 pm Saturday
<b>Nurse Line</b>  Members can contact the nurse line if they are unable to reach their doctor	1-855-805-9420	24 hours a day 7 days a week
<b>Care Navigator Team</b>  Members can contact the Care Navigator Team if they need help with scheduling appointments, coordination of care, transportation, and completing their Health Risk Assessment.	1-855-845-6216	8:30 am to 4:00 pm Monday – Friday
<b>Flex Card:</b> Healthy Food, OTC, Bathroom Home and Safety Items and Utilities	1-833-623-2619	8:00 am to 8:00 pm Monday – Friday

**Important Addresses**

**HIGHMARK WHOLECARE MEDICAID/MEDICARE ASSURED  
MAILING ADDRESS LIST**

**IMPORTANT NOTE:**

**To ensure your correspondence reaches the intended department all mailing addresses  
MUST include the appropriate Delivery Code and Attention Line.**

<b>Corporate Office:</b> Delivery Code Attention Highmark Wholecare 120 Fifth Avenue Pittsburgh, PA 15222	<b>FedEx &amp; UPS Packages:</b> All FedEx & UPS packages must be sent to the Corporate Office address along with the appropriate <b>Delivery Code and Attention line</b> .
<b>Reason for Mailing:</b>	<b>Mailing Address:</b>
<b>Claims – Medicaid</b> Medical Medicaid Payor ID – 25169	Attention: Claims Administrator PO Box 211713 Eagan, MN 55121  When submitting claims please note the Pennsylvania Payer ID Number is 25169. Any claim submitted to the wrong address or with an incorrect Payer ID Number will reject.
<b>Claims – Medicare Assured</b> Medical and Behavioral Health Medicare Payor ID – 60550	Attention: Claims Administrator PO Box 211164 Eagan, MN 55121  When submitting claims please note the Pennsylvania Payer ID Number is 60550. Any claim submitted to the wrong address or with an incorrect Payer ID Number will reject.

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<b>Reason for Mailing:</b>	<b>Mailing Address:</b>
<b>Administrative Claims Reviews</b> Fax to 1-844-207-0334 - Preferred submission method	Delivery Code: WC-CLAIMS Attention: Claims Highmark Wholecare PO Box 890063 Camp Hill, PA 17089
<b>Refund Payments</b> Refund payments should be submitted to the following address. Refund forms can be submitted through the Provider Portal via NaviNet.	Attention: Finance Operations P.O. Box 890135 Camp Hill, PA 17089
<b>Clinical Provider Appeals</b> Fax to 1-855-501-3904 - Preferred submission method	Attention: Provider Appeals Highmark Wholecare PO Box 890034 Camp Hill, PA 17089
<b>Credentialing</b>	Delivery Code: WC-CRED Attention: Credentialing Highmark Wholecare PO Box 535191 Pittsburgh, PA 15253-5191
<b>Dental Claims</b>	Attention: Claims United Concordia PO Box 2190 Milwaukee, WI 53201
<b>Member Appeals &amp; Grievances</b>	Attention: Appeals & Grievances Highmark Wholecare PO Box 890034 Camp Hill, PA 17089

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<b>Reason for Mailing:</b>	<b>Mailing Address:</b>
<b>Member Enrollment/Disenrollment</b>	Delivery Code: WC-ENROLL Attention: Enrollment Highmark Wholecare PO Box 535191 Pittsburgh, PA 15253-5191
<b>Member Transfers</b>	Delivery Code: WC-ENROLL Attention: Enrollment Highmark Wholecare PO Box 535191 Pittsburgh, PA 15253-5191
<b>Overpayments</b> Self-Audit/Overpayment Form can be submitted through the Provider Portal via Navient	<b>For Claim Retraction, mail Overpayment Form to:</b> Delivery Code: FIPR Attention: FWA/SIU Unit Highmark Wholecare 120 Fifth Avenue Pittsburgh, PA 15222  <b>For Checks, mail Checks with Form to:</b> Highmark Wholecare Attn: FIPR PO Box 890135 Camp Hill, PA 17089
<b>Pharmacy and Therapeutics (P &amp; T) Committee</b>	Delivery Code: WC-PHARM Attention: Pharmacy Services Highmark Wholecare PO Box 22158 Pittsburgh, PA 15222
<b>Practice Change Information</b> Fax to 1-855-451-6680- Preferred submission method  FQHC/RHC providers submit their changes to <a href="mailto:Roster_Updates@highmarkwholecare.com">Roster_Updates@highmarkwholecare.com</a>  <a href="#">Practice Change Request Form</a>	Delivery Code: WC-PDM Attention: Provider Data Management Highmark Wholecare PO Box 890039 Camp Hill, PA 17089-0039

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<b>Reason for Mailing:</b>	<b>Mailing Address:</b>
<b>Prescription Drug Claims</b>	Attention: Reimbursements Administrator Highmark Wholecare P.O. Box 22158 Pittsburgh, PA 15222
<b>Quality of Care Correspondence</b>  Preferred method of communication: <u><a href="mailto:Quality_of_Care@highmarkwholecare.com">Quality_of_Care@highmarkwholecare.com</a></u>  Fax to 1-855-878-4168	Delivery Code: WC-QCARE Attention: Quality of Care Highmark Wholecare 120 Fifth Ave, Pittsburgh, PA 15222
<b>Retrospective Authorization Reviews</b>	Attention: Retrospective Reviews Highmark Wholecare PO Box 22278 Pittsburgh PA 15222
<b>Subrogation (COB)</b>	Delivery Code: WC-ENROLL Attention: Enrollment Highmark Wholecare PO Box 535191 Pittsburgh, PA 15253-5191
<b>VSP Vision Claims</b>	<b>In Network</b>  Vision Service Plan Attention : Claim Services PO Box 495907 Cincinnati, OH 45249-5907  <b>Out of Network and Retail</b>  Vision Service Plan Attention : Claim Services PO Box 495918 Cincinnati, OH 45249-5918

## **Highmark Wholecare Medicare Assured 2026 Provider Manual**

### **Plan Co-Payments**

A member's out-of-pocket expense or cost sharing will vary depending upon the level of assistance they may be receiving from the State or Medicaid, as well as which Highmark Wholecare Medicare Assured plan they have chosen to join. For more benefit information, please refer to the Evidence of Coverage booklet for each healthcare option located on our website at <https://www.highmark.com/wholecare/medicare/plans>.

For your convenience, co-pays for frequently used services are listed here:

<b>Dual Eligible Special Needs Plans (D-SNP)</b>	<b>Co-payment</b>		
	<b>PCP</b>	<b>SPECIALIST</b>	<b>ER</b>
Highmark Wholecare Medicare Assured Diamond (HMO SNP)	\$0	\$0	\$0**
Highmark Wholecare Medicare Assured Ruby (HMO SNP)	\$0	\$30	\$115**^

\*\*Not covered outside the U.S. except under limited circumstances.

^ Ruby ER cost-share is waived if members are admitted to the hospital within 24 hours for the same condition.

Please note: All members enrolled in Highmark Wholecare Medicare Assured Diamond and Highmark Wholecare Medicare Assured Ruby also have Medicaid (Medical Assistance) or receive some assistance from the State. Some members will be eligible for Medicaid coverage to pay for cost sharing (deductibles, copayments, and coinsurance). They may also have coverage for Medicaid covered services, depending on their level of Medicaid eligibility. Please follow Medicaid coverage and claims processing guidelines. Please contact Highmark Wholecare Medicare Assured Provider Services for member specific information.

Highmark Wholecare dually eligible Medicare Assured members shall not be held liable for Medicare Parts A and B cost-sharing when the appropriate state Medicaid agency or Community Health Choices (CHC) Plan is liable for the cost-sharing.

Providers further agree that upon payment from our company under Highmark Wholecare Medicare Assured line of business, providers will accept our plan payment as payment in full; or bill the appropriate State source. Please make sure to follow Medicaid coverage and claims processing guidelines. Network providers are prohibited from seeking payment directly from the State for members enrolled in a CHC plan. Balance billing a dual eligible for deductible, coinsurance, and copayments is prohibited by Federal law.

## **INTRODUCTION**

### **About This Manual**

Our successes, measured by member and provider satisfaction and assessments by the Centers for Medicare and Medicaid Services (CMS), are dependent upon a strong understanding of Highmark Wholecare's policies and procedures. The entire Highmark Wholecare team is committed to providing accurate, up-to-date and comprehensive information to our member and provider communities through prompt and dedicated service. This Provider Manual is one way of sharing information with participating practitioner offices, hospitals and ancillary providers and is considered part of your contractual agreement with us. This manual is a reference and is designed to be updated as needed. Please retain all updates with your manual.

This manual and any updates are available in the Providers section of our website at <https://providers.highmark.com/wholecare> under Medicare Resources, Medicare Assured Forms & Reference Materials.

### **Overview of Highmark Wholecare**

#### **About Us**

We believe in caring for the whole person in all communities where the need is greatest. We see a future in which everyone has equal opportunity to achieve their best health. Through our leading Medicaid and Medicare programs, we coordinate healthcare that goes beyond doctors and medicine to help members achieve not just physical health but also delivers whole person care. Our team members are helping to drive this new kind of healthcare in collaboration with a network of 29,000 primary care physicians, specialists, hospitals and other ancillary providers. We are also committed to supporting our neighbors through our many community outreach and engagement programs.

Highmark Wholecare offers HMO plans with a Medicare contract. Enrollment in these plans depends on contract renewal. Every year, Medicare evaluates plans based on a 5-star rating system. Highmark Wholecare complies with applicable federal civil rights laws and does not discriminate on the basis of race, color, national origin, religious creed, sex, sexual orientation, gender identity, disability, English proficiency, or age. Highmark Wholecare does not exclude people or treat them differently because of race, color, national origin, age, disability or sex.

#### **Philosophy and Social Determinants of Health**

Our legacy of addressing social determinants of health (SDoH), which refers to the conditions in which people are born, grow, live, work and age, can be traced back to the start of the company more than 30 years ago.

We offer a wide variety of programs and demonstrations focused on delivering whole person care and addressing SDoH for our members. Many of these initiatives are available by member referral through our care management program.

# **Highmark Wholecare Medicare Assured 2026 Provider Manual**

More than 15 years ago, our organization recognized that health is about more than just physical health and developed our proprietary BEEMSS Assessment. This tool provides our team with the framework to assess relevant medical-social factors impacting our members, all while tailoring their individualized care plans: behaviorally, environmentally, economically, medically, and socially.

Highmark Wholecare's Community Support Tool, a free support resource tool supported by the "Find Help" platform, is a way to quickly and easily search for community support resources online. Users can find food, housing, and transportation resources. They can also search for employment and mental health support programs.

Highmark Wholecare Resource Center by findhelp - Search and Connect to Social Care

## History

In 1992, our company was established as an alternative to Pennsylvania's Department of Public Welfare's Medical Assistance Program. For more than 30 years, members have benefited from services such as disease management, health and wellness programs and preventive care. Today, we are a top-ranked managed care organization that serves more than 300,000 members in Pennsylvania.

Since 2006, we have also offered a Medicare product geared toward the unique needs of individuals eligible for both Medicare and Medicaid. Highmark Wholecare Medicare Assured is a Dual Eligible Special Needs Plan (D-SNP) with a Medicare contract and a contract with the state Medicaid program.

In 2026, Highmark Wholecare operates in sixty-two (62) Pennsylvania counties:

## MEDICARE COVERED COUNTIES



## **Highmark Wholecare Medicare Assured 2026 Provider Manual**

For individuals who qualify, there is no, or a low, monthly premium (depending on their level of Medicaid eligibility). Qualifying members receive healthcare coverage, plus prescription drug coverage, dental, transportation, vision, hearing services, fitness center membership and much more – all from ONE plan!

### **Mission**

Our mission is to care for the whole person in all communities where the need is the greatest.

### **Products**

We offer two Dual-Eligible Special Needs Plans (D-SNP), serving those with Medicare Parts A and B, among other qualifying factors.

These plans are:

- Highmark Wholecare Medicare Assured Diamond- for those with full Medical Assistance such as FBDE, QMB, QMB+ or SLMB+
- Highmark Wholecare Medicare Assured Ruby- for those with some level of assistance from the state such as SLMB or QI

Highmark Wholecare offers a variety of benefits to members enrolled in one of our D-SNP plans:

1. All the benefits of original Medicare
2. Flex card with a combined allowance for over-the-counter (OTC) products and home and bathroom safety items. SSBCI eligible members will receive an additional allowance for healthy food, utilities, and pay-at-the-pump gasoline.
3. Transportation for health related needs for Diamond members only.
4. Prescription drug coverage including Step Therapy
5. Hearing exams and hearing aids
6. Preventative and comprehensive dental services, including dentures
7. Vision exams and eyewear
8. Case Management programs to help with disease prevention and smoking/tobacco cessation (including additional visits per attempt)
9. A fitness program to help members stay active (including options for home-bound members)
10. Mental health services
11. Post discharge meals
12. Personal Emergency Response System
13. Health and Wellness education
14. Routine chiropractic care

## **Enhanced Benefits for 2026**

### My Health Flex

Diamond members who qualify for SSBCI will receive \$300 per month combined allowance for OTC, Home/Bathroom Safety, Healthy food, Utilities, and Pay-at-the-Pump gasoline. Members can use the allowance to pay plan approved utility expenses or to purchase healthy food or OTC items at select retail locations, online or via the catalog, or Home/Bathroom Safety items via online only. Members qualified for SSBCI will also be allowed to purchase gasoline at the pump. Unused allowances expire at the end of the month. Fee and plan restrictions apply.

Diamond members who do not qualify for SSBCI will receive \$100 per month combined allowance for OTC and Home/Bathroom Safety items. Members can use the allowance to purchase OTC items at select retail stores, online or via catalog, or Home/Bathroom Safety items via online catalog. Unused allowances expire at the end of the month. Fees and plan restrictions apply.

Ruby members who qualify for SSBCI will receive \$165 per quarter combined allowance for OTC, Home/Bathroom Safety, Healthy food, Utilities, and Pay-at-the-Pump gasoline. Members can use the allowance to pay plan approved utility expenses or to purchase healthy food or OTC items at select retail locations, online or via the catalog, or Home/Bathroom Safety items via online catalog. Members qualified for SSBCI will also be allowed to purchase gasoline at the pump. Unused allowances expire at the end of the quarter. Fee and plan restrictions apply.

Ruby members who do not qualify for SSBCI will receive \$45 per quarter combined allowance for OTC and Home/Bathroom Safety items. Members can use the allowance to purchase OTC items at select retail stores, online or via catalog, or Home/Bathroom Safety items via online catalog. Unused allowances expire at the end of the quarter. Fees and plan restrictions apply.

### Dental Benefits:

#### **Diamond Members:**

- \$6,500 in combined allowance for Preventative & Comprehensive services
- Any combination of routine prophylaxis and periodontal maintenance, including periopropy, totaling 4 treatments per year
- 2 Endodontic services per year
- Crowns limited to 2 per year, 1 crown in 5 years per tooth
- Dentures are covered, one per arch every year including a full or partial denture or an immediate denture and repairs

#### **Ruby Members:**

- \$2,000 Comprehensive Dental services allowance
- Any combination of routine prophylaxis and periodontal maintenance, including periopropy, totaling 4 treatments per year
- 1 Endodontic service per year
- Crowns limited to 1 per year, 1 crown in 5 years per tooth

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- Dentures are covered one per arch every 5 years, including a full denture, a partial denture or an immediate denture and are not applied to the comprehensive maximum plan coverage amount.

### Vision Benefits (VSP):

#### Diamond Members

- \$600 per year for eye glass frames or contact lenses
  - 1 pair of lenses and frames or contact lenses each year
  - Lens types covered in full: single vision, lined bifocals, lined trifocals and lenticular
  - The following lens upgrades are covered: Scratch coating, oversized lenses, Tints, Standard progressives, Photchromic lenses, UV coating, and Polycarbonate lenses. Plan restrictions apply.

#### Ruby Members

- \$150 per year for eye glass frames or contact lenses
  - 1 pair of lenses and frames or contact lenses each year
  - Lens types covered in full: single vision, lined bifocals, lined trifocals and lenticular

### Hearing Aid Benefit (TruHearing):

#### Diamond Members:

- One (1) TruHearing-branded hearing aid per ear, every three (3) years
  - One year of follow-up visits for fitting and adjustments included
  - Limited to TruHearing's advanced and Premium hearing aids, a rechargeable option is available.
  - 80 batteries per aid for non-rechargeable models

#### Ruby Members:

- One (1) TruHearing-branded hearing aid per ear, every three (3) years
  - One year of follow-up visits for fitting and adjustments included
  - Limited to TruHearing's advanced and Premium hearing aids, a rechargeable option is available.
  - 80 batteries per aid for non-rechargeable models

To learn more, members can call 844-277-8052 (TTY users call 711), Monday through Friday, 8:30 am to 5:00 pm ET.

Highmark Wholecare is dedicated to providing benefits to the Medicare and Medicaid populations to meet their medical and social needs. The specific needs of our membership have led to the development of wellness, education, and outreach programs. These programs identify needs and provide effective case management for members with chronic conditions such as asthma, COPD, diabetes, and cardiovascular conditions.

## **Continuing Quality Care**

Healthcare is an ever-changing field, and we strive to stay on top of the members' needs. We are committed to continually improving and providing high standards of quality in every aspect of service. This commitment is led by the Highmark Wholecare's Quality Improvement/Utilization Management Committee, made up of experts in a wide variety of medical fields. The QI/UM Committee evaluates our ongoing efforts as well as new protocols and quality initiatives in order to improve service and care for members.

## **Wellness & Disease Management**

Highmark Wholecare is committed to improving the life of its membership and is working to find new ways to promote wellness, illness prevention and health education as demonstrated by the following:

- Preventive health care
  - Annual Flu Vaccinations (Age 18 and older)
  - Annual Wellness Visit (Age 18 and older)
  - Breast Cancer Screening (Women ages 50 to 74 years)
  - Colorectal Cancer Screening (ages 50 to 75 years)
  - Diabetes tests as needed, such as HbA1C, dilated retinal eye exam, and micro albumin (members with diabetes)
  - Covid-19 Vaccination (For eligible population)
- Tobacco cessation education and benefits
- Pediatric and adult immunization reminders
- Wellness Coaches
  - Registered Dietitian
  - Certified Diabetes Educator
  - Certified Rehab Counselor

The Clinical Practice and Preventative Guidelines are listed within the provider portal:  
<https://content.highmarkprc.com/Files/Wholecare/docs/MedicareAssuredGuidelines.pdf>

## **Health Care Disparities**

We understand that in order to help improve our members' quality of life, we must take into account racial, ethnic, cultural, and linguistic differences as well as sexual orientation and gender identity. For this reason, addressing inequities is high on our leadership's agenda.

Highmark Wholecare has a Health Equity Program whose activities are overseen by Wholecare's Health Equity Committee (HEC). The HEC's primary objective is to address health care disparities for its diverse membership and ensure that services are accessible and provided in a culturally, linguistically, and inclusively competent manner. In 2024, Wholecare was awarded NCQA Health Equity Accreditation with a Plus Distinction (HEA+) for the next three years. NCQA HEA+ identifies organizations that lead the market in providing inclusive services and working to reduce health care inequities. The Plus Distinction demonstrates Wholecare's commitment to the communities in which our diverse populations live and work by identifying social risks and addressing social needs. We believe a strong patient-provider relationship is the key to reducing the gap in unequal health care access and health care outcomes due to cultural, language, geographic, and/or personal identity barriers.

## **Highmark Wholecare Medicare Assured 2026 Provider Manual**

In an effort to develop a strong patient provider relationship we ask, via the company's Cultural Competency Data Form, our providers to share their race, ethnicity, and language information. Disclosing this information is strictly voluntary and will not be used for credentialing, contracting or for any discriminatory purposes. The availability of this information allows us to connect members with the appropriate practitioners, to fit their needs and preferences. This allows our providers to foster better provider-patient communication, and improve patients' health, wellness, and safety.

Additionally, we are encouraging all providers to take cultural competency training and to inform us about the various trainings taken by providers and their office staff throughout the year. Providers can access the Cultural Competency Data Form on our website at <https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/Forms/CulturalCompetencyDataForm.pdf>.

We also have cross-cultural education programs in place to increase awareness of racial and ethnic disparities in health care among our associates, members and providers. A provider cultural toolkit is available on our website at <https://providers.highmark.com/wholecare/provider-resources/cultural-competency-toolkit>.

The cultural toolkit includes facts about healthcare disparities from the Institute of Medicine, tips on how to better communicate with patients, tools to use to evaluate how well the practice is delivering quality care to culturally diverse populations, information about communication regulations and resources from the Title VI of the Civil Rights Act of 1964, facts about various cultures to enable the advocacy of high-quality, culturally competent services to multi-ethnic populations, web-based modules for physicians to practice responding to situations where culturally competent care is needed and more.

Lastly, we assess our member populations' language profile at least every three years and make the Population Assessment Language Profile report available to practitioners through updates to Provider News.

### **Community Involvement**

Highmark Wholecare is an active partner in the community through:

- Participation in community events and sponsorships.
- Assisting community and social services agencies that serve high-risk populations.
- Developing outreach programs at no cost to the community for adults and children to educate them about health, wellness and safety issues.
- Promoting our health literacy initiative with individuals and organizations in the communities we serve. The goal of this initiative is to help people better understand and navigate the healthcare system.

## **Benefits of Highmark Wholecare Medicare Assured**

Highmark Wholecare is a “win-win” situation for all involved. Members receive improved access to primary medical care and health and wellness programs. Providers receive timely payments, simplified administrative procedures and dedicated provider servicing. We fulfill our mission and ensure the availability of high-quality medical care for the dual eligible population to positively affect the personal health of individuals.

## **How Does Highmark Wholecare Work?**

### **Highmark Wholecare Medicare Provider Network**

We contract directly with primary and specialty care practitioners, hospitals, and ancillary providers to provide care for our membership. Our provider network consists of approximately 30,000 providers, which includes primary care, specialist practitioners, behavioral health providers, hospitals, ancillary locations, a network of pharmacies, home healthcare agencies and other related healthcare providers. Practitioners and other healthcare providers are chosen in such a manner that existing patterns of care, including patterns of hospital admissions, can be maintained. Participating practitioners treat our members in their offices the same as they treat patients from any other health plan and agree not to discriminate in the treatment of or in the quality of services delivered to our members on the basis of race, color, national origin, religious creed, sex, sexual orientation, gender identify, disability, English proficiency, age, place of residence, health status, or source payment. Because of the cultural diversity of our membership, participating providers must be culturally sensitive to the needs of our members. Participation in no way precludes participation in any other program with which the provider may be affiliated.

### **Provider Self-Service**

NaviNet is a web-based solution that securely links providers nationwide through a single website. This service is available at no cost to our participating providers. NaviNet is the preferred tool for inquiring about member information.

We encourage our participating providers to access the NaviNet secure Provider Portal to utilize the self-service tools available, including:

- Secure Messaging and Document Exchange for direct and secure bi-directional communication and submission of documentation
- Claims search including remittance advice data search option that displays all claims that have been paid to a specific check number
- Batch claims search which allows the user to view all claims for a specific provider office
- Authorizations requests
- GuidingCare – Inpatient, Outpatient, and Family Planning
- HealthHelp – Musculoskeletal/Pain Management, Diagnostic Imaging, Cardiology, Sleep, Radiation Oncology, and Physical Medicine
- Submit Provider Post-Service Appeals
- Submit Claims and Payment Disputes
- Code Authorization Look-Up Tool
- Substance Use Disorder Resource Page

## **Highmark Wholecare Medicare Assured 2026 Provider Manual**

\*Highmark Wholecare Providers are able to initiate authorization requests online by accessing the Authorization Portal through NaviNet Single Sign-On (SSO) functionality. From the Health Plans dropdown on the NaviNet Plan Central page, select Highmark Wholecare then GuidingCare or HealthHelp>Authorization Portal from the Plan Workflows menu. For additional information regarding GuidingCare, please refer to the GuidingCare User Guide on our website at <https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/documents/GuidingCareUserGuide.pdf>.

For additional information regarding HealthHelp, please refer to the HealthHelp User Guide on our website at: <https://portal.healthhelp.com/landing/?p=F4EA3C5B7C7E3F73>

### **Provider Relations Role**

Highmark Wholecare uses dedicated, highly trained Provider Account Liaisons (PALs), Strategic Provider Account Liaisons and Federally Qualified Health Center (FQHC)/Rural Health Clinic (RHC) Contracting and Servicing Consultants. We are keenly aware that it is essential our providers and their staff have a solid understanding of the members' needs, our contract requirements, protocols, and Federal and/or State regulations in order to provide exceptional access and quality health care to our members. PALs and FQHC/RHC Contracting and Servicing Consultants will provide an initial training orientation to providers and their office staff within thirty (30) calendar days of successfully gaining approval to participate in our network. During that training the Provider Manual is reviewed. The training familiarizes new providers and their staff with our company policies and procedures.

All Provider In-Service training materials are located on the Highmark Wholecare website at <https://providers.highmark.com/wholecare/provider-resources/in-service-materials>.

The annual provider education and orientation training is available on the Highmark Wholecare website at <https://providers.highmark.com/wholecare/provider-resources/education-webinars>.

FQHC/RHC In-Service resources are located on the Highmark Wholecare website at: <https://providers.highmark.com/wholecare/provider-resources/fqhc-rhc-resources>.

Each participating primary care practice, specialty care practice and hospital is assigned a Provider Account Liaison who is responsible for ongoing education.

As a follow-up to the initial orientation, each assigned Provider Account Liaison regularly contacts providers and their staff to ensure full understanding of the responsibilities outlined in the Provider Agreements and Manual.

## **Primary Care Practitioner's Role**

The definition of a primary care practitioner (PCP) is a specific practitioner, practitioner group or a certified registered nurse practitioner (CRNP) operating under the scope of his/her licensure, who is responsible for supervising, prescribing, and providing primary care services; locating, coordinating, and monitoring other medical care and rehabilitative services; and maintaining continuity of care on behalf of a member. The PCP is responsible for the coordination of a member's healthcare needs including access to services provided by hospitals, specialty care practitioners, ancillary services and other healthcare services. To ensure continuity and coordination of care, when a member obtains care outside of the primary care practice, a report should be forwarded by the rendering provider to the member's designated PCP. By focusing all of a member's medical decisions through the PCP, members are given comprehensive and high-quality care in a cost-effective manner. One of our goals is to work together with a dedicated group of practitioners to make a positive impact on the health of our membership and truly make a difference.

## **Contracts/No Gag Clause**

Highmark Wholecare allows open practitioner-patient communication regarding appropriate treatment alternatives without penalizing practitioners for discussing medically necessary or appropriate care for the patient. All of our contracts with practitioners and providers include an affirmative statement indicating that the practitioner can freely communicate with patients regarding the treatment options available to them, including medication treatment options regardless of benefit coverage limitations. There is no language in our contracts that prohibits open clinical dialogue between practitioner and patient.

## **Quality Improvement**

### **Purpose of the Quality Improvement Program**

The purpose of the Quality Improvement (QI) Program is to ensure that members have access to and receive safe, appropriate, timely, and equitable quality medical and behavioral health care services. The QI Program monitors and evaluates the quality and appropriateness of care provided by the Highmark provider network and the effectiveness and efficiency of systems and processes that support the health care delivery system. Utilizing quality improvement methodologies and industry-accepted quality measurement tools, Highmark evaluates its performance outcomes to:

- Provide oversight and governance of the SNP Model of Care (MOC)
- Identify opportunities to improve the provision and delivery of health care and health plan services
- Identify opportunities to improve member and provider satisfaction with care delivery and services
- Achieve optimum member health outcomes

The QI Program centers on these key areas:

- Quality of clinical care

- Safety of clinical care
- Quality of service
- Member experience
- Health Equity

The QI Program strives to improve member adherence to preventive care guidelines, disease management strategies, and therapies that are essential to the successful management of certain chronic conditions.

The QI Program also strives to improve patient safety through:

- Education of members and providers regarding safe practices
- Assessment and identification of opportunities to improve patient safety throughout the provider network
- Communication to members and providers of safety activities and provisions that may be in place throughout the network

To ensure these efforts impact all members equally, the QI Program aspires to continually identify opportunities to positively impact health outcomes and address any healthcare disparities as well as language barriers.

In addition, the QI Department maintains a catalog of policies and procedures that guide the execution of the QI Program. QI policies and procedures are reviewed and updated annually to reflect changes in requirements, government regulations, and the needs of the membership and provider network.

### **Goals of the Quality Improvement Program**

The goal of the QI Program is to ensure the provision and delivery of high-quality medical and behavioral health care, pharmaceutical and other covered health care services, and quality health plan services.

The QI Program focuses on monitoring and evaluating the quality and appropriateness of care provided by the Highmark provider network and the effectiveness and efficiency of systems and processes that support the health care delivery system. Utilizing quality improvement concepts and appropriately recognized quality measurement tools and reports, Highmark focuses on assessing its performance outcomes to identify any potential gaps and opportunities for improvement in the provision and delivery of health care and health plan services, patient safety, satisfaction with care and services, and achieving optimum member health outcomes.

By considering population demographics, health risks, utilization of health care resources, and financial analysis, the organization ensures that the major population groups are represented in QI activities and health management programs chosen for assessment and monitoring.

This information, along with high-volume/high-cost medical and pharmaceutical reports, health risk appraisal data, disease management and care management data, satisfaction survey information, and other utilization reports, will be used to identify members with special needs and/or chronic conditions and develop programs to assist in managing their conditions.

The QI program includes a focus on members who are considered the most vulnerable and receive coordinated care as defined in the MOC. Highmark developed five focused plan level goals which are:

1. Improve access and affordability of the healthcare needs of the population.
2. Improvements made in the coordination of care and appropriate delivery of services.
3. Enhance care transitions across settings and providers.
4. Ensure the appropriate utilization of services for preventive health and chronic conditions.
5. Improve member experience.

### **Objectives of the Quality Improvement Program**

The objectives of the QI Program are consistent with the Highmark mission, which is a commitment to both effective uses of healthcare resources and to continuous quality improvement in order to positively affect the member's whole care and their Health-related social needs (HRSN) and social determinants of Health (SDoH).

Quintuple Aim methodology is utilized to make sure programs focus on patient experience, population health, provider well-being and engagement to reduce costs, improve patient outcomes, and enhance care team collaboration. A core component of the Quintuple Aim is health equity which improves the overall health of the member population, patient experiences, promotes provider well-being, and focuses on all members having equal opportunities to access high quality healthcare services.

Highmark utilizes the Plan, Do, Study, Act methodology to implement the QI Program. The QI team creates an annual program strategy and description (Plan) that is reviewed and accepted through the QI Committee structure. The goals, programs, and objectives outlined in the strategy are tracked through a quarterly QI Program Work Plan (Do). The Work Plan includes performance metrics such as HEDIS measures, survey outcomes, meeting minutes and other departmental reports. Programs at risk are taken through the QI Committee structure for mitigation and/or root cause analysis. Annually, the QI Program, including those items within the MOC are evaluated through the QI Program Evaluation (Study). The evaluation allows the business areas to identify barriers, mitigations, and opportunities for the upcoming year. Program level changes are made based on the evaluation outcomes (Act).

The objectives of the QI Program are outlined below:

1. Development and implementation of an annual QI work plan to assure completion of planned activities. Current "whole care" needs of the population are evaluated. Programs are implemented to ensure continuous quality improvement. The work plan is updated quarterly and annually to determine effectiveness, to identify opportunities for improvement, and to ensure completion of planned QI activities for each year.
2. The Provision of Appropriate, Timely, and Quality Health Care Services
3. Develop Guidelines which Address the Member Population
4. Assess Practitioner Performance

## **Scope of the Quality Improvement Program**

The success of the Quality Improvement Program is directly related to the collaboration of all Highmark employees in support of the Highmark mission. The responsibility of implementing the QI Program is a Highmark corporate responsibility, not only that of the Quality Improvement Department. Implementation and evaluation of the QI Program are embedded into the Highmark daily operations. The scope of the QI Program focuses on the following areas:

### **Quality of Clinical Care**

The QI Program focuses on delivering to members clinical services that are safe, appropriate, and meet professional standards. This is ensured through the monitoring of key indicators including, but not limited to, HEDIS measures, Star measures, Preventive and Clinical Practice Guidelines and a review of Quality-of-Care concerns such as Preventable Serious Adverse Events (PSAE) and Never Events. Identification of the most prevalent chronic disease/conditions to establish goals with positive health outcomes is conducted with the promotion of the Chronic Care Improvement Program (CCIP). The Chronic Care Improvement Program (CCIP) initiative establishes goals with positive health outcomes by identifying the most prevalent chronic diseases/conditions. Initiatives are designed and implemented to prioritize indicators that have not been achieved or are negatively deviating from goals.

### **Quality of Service**

The QI Program focuses on delivering customer service to the members that is professional, equitable, accessible, available, and meaningful. This is ensured through the monitoring of key indicators including, but not limited to, the demographics of the population, including ethnic and racial disparities in healthcare and language barriers, the annual CAHPS Member Satisfaction Survey, Member Complaints and Grievances, Provider Appeals, and Member and Provider Call Center Statistics. Initiatives are designed and implemented to address any indicators that have not been achieved or are negatively deviating from goals.

### **Safety of Clinical Care**

The QI Program works to improve patient safety by monitoring for member and practitioner education regarding safe practices, by assessing and identifying opportunities to improve patient safety throughout the practitioner/provider network, and by ensuring that members and practitioners have been informed about safety activities and provisions which may be in place throughout the network. An additional method for monitoring safe practices and identifying opportunities involves collaboration with the Fraud Waste and Abuse department, auditing providers prescribing patterns, and reviewing clinical data related to safe prescribing methods and following clinical practice guidelines.

### **Member Experience**

The QI Program focuses on creating and maintaining a positive member experience through initiatives based on the results of the annual CAHPS and Health Outcomes Survey (HOS), Care Management satisfaction survey, and the trending of member inquiries, complaints, appeals and grievances to identify areas of opportunity.

Member Experience is also monitored through the quality and availability of provider services. This is ensured through the monitoring of network primary care physician (PCP) and specialist availability and accessibility, medical record reviews, including documentation standards, the assessment of continuity and coordination of care, and the conduction an annual Member and Provider Satisfaction Survey.

**Model of Care**

The Model of Care (MOC) is a vital quality improvement tool and an integral component for ensuring that the unique needs of each beneficiary enrolled in a Medicare Special Needs Plan (SNP) are identified and addressed. The Patient Protection and Affordable Care Act (ACA) reinforces the importance of the MOC as a fundamental component of SNP quality improvement. The National Committee for Quality Assurance (NCQA) executes the review and approval of SNP MOCs based on standards and scoring criteria established by the Centers for Medicare & Medicaid Services (CMS).

Model of Care standards are comprised of four clinical and non-clinical elements:

1) Description of the SNP Population (General Population) 2) Care Coordination 3) Provider Network and 4) MOC Quality Performance Improvement Plan. Activities falling within the scope of the Highmark SNP Model of Care are overseen and governed by the Quality Improvement Department by way of updates to the QI Work Plan, the MOC Workgroup, and standup meetings as needed. Quality Improvement is responsible to ensure the goals are set within the MOC and the standards are approved and met by CMS.

Additional activities to fulfill the scope:

- Health Equity program identifies and assesses factors that potentially impact the members health, including demographics (e.g., age, sex at birth, ethnicity), gender and sexual identity, and other health disparities (e.g., access to and availability of medical facilities and services, variations in disease occurrences, mortality, language barriers, deficits in health literacy, poor socioeconomic status, cultural beliefs or barriers that may interfere with conventional provision of health care or services, caregiver considerations, or other concerns).
- Highmark monitors the Network Availability of primary care and specialty practitioners to ensure an adequate network of practitioners is maintained. Also, practitioners are assessed to ensure the cultural and linguistic needs of its members are met.
- Review of activities falling within the scope of the Highmark Utilization Management department including monitoring criteria and processes to ensure that appropriate utilization decisions are made as outlined in the Model of Care.
- Oversight to ensure proper credentialing of new practitioners as well as the recredentialing of participating providers, non-physician practitioners, and therapy providers.
- Monitoring and evaluation of the Case Coordination program, which includes Preventative Health, Disease, and Case Management programs.
- Monitoring of activities falling within the scope of the Pharmacy Department and the Pharmacy and Therapeutics (P & T) Committee.
- Evaluation of Patient Safety.

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- Monitoring of activities falling within the scope of the behavioral healthcare program.
- Collaboration with advanced data analytics and other reporting teams to evaluate the population and determine opportunities for improvement.
- Monitoring activities by Population Health Management (PHM).

To request a copy of the Quality Improvement Program Description, Work Plan or Annual Evaluation, please contact the Provider Services Department at 1-800-685-5209.

### **Clinical Practice Guidelines**

The Clinical Practice Guidelines are designed as a resource to assist practitioners in caring for our members. The clinical practice and preventive guidelines have been developed using either evidence-based clinical guidelines from recognized sources, or through the involvement of board-certified practitioners from appropriate specialties. The guidelines are evaluated on an ongoing basis and are developed based on the prevalent diseases, conditions or relevance to our members, as well as applicable regulatory and accrediting body requirements. The use of guidelines permits Highmark Wholecare to measure the impact of the guidelines on outcomes of care and may reduce inter-practitioner variation in diagnosis and treatment.

Clinical practice and preventive guidelines are not meant to replace individual practitioner judgment based upon direct patient contact. Information on the following guidelines may be found on the website at

<https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/documents/MedicareAssuredGuidelines.pdf>.

- Adult Preventive Health (Screening, Counseling, Immunizations)
- Asthma Management
- Bipolar Disorder
- Cardiac (Elevated Cholesterol, Chronic Heart Failure, Coronary & Other Atherosclerotic Vascular Disease)
- Chronic Obstructive Pulmonary Disease
- Depression
- Diabetes
- Healthy Weight Management
- HIV
- Hypertension
- Opioids- Prescribing for Chronic Pain
- Palliative Care
- Prenatal Care- Routine and High-Risk
- Schizophrenia
- Substance Use Disorder

A paper copy of the individual guidelines is available upon request.

## **Patient Safety**

Patient safety is the responsibility of every healthcare professional. Healthcare errors can occur at any point in the healthcare delivery system; they can be costly in terms of human life, function, and health care dollars. Then there are the indirect costs of healthcare errors, such as a loss of trust and patient/practitioner dissatisfaction.

There are ways practitioners can develop a culture of patient safety in their practice. Clear communication is key to safe care. Collaboration between members of the interdisciplinary care team, hospitals, other patient care facilities, and the patient is critical. Safe practices include, but are not limited to, providing instructions to patients in terms they can easily understand, writing legibly when documenting orders or prescribing, and avoiding abbreviations that can be misinterpreted.

Read all communications from specialists and send documentation to other providers, as necessary, to assure continuity and coordination of care. When calling in orders over the telephone, have the person on the other end repeat the information back to you.

Collaborate with hospitals and support their safety culture. Bring patient safety issues to the committees you attend. Report errors to your practice or facility's risk management department. Offer to participate in multidisciplinary work groups dedicated to error reduction. Ask our Quality Improvement Department how you can support compliance with our safety initiatives.

We also work to ensure patient safety by monitoring and addressing quality of care issues identified through several internal and external sources such as: pharmacy, care management, and utilization data, continuity and coordination of care standards, sentinel/adverse event data, disease management program follow-up, fraud waste and abuse investigations, practitioner/provider, delegates, State and/or Federal agencies, and member complaints.

If you would like to learn more about patient safety, visit these web sites:

- Institute of Medicine Report: To Err is Human-Building a Safer Health Care System: <https://www.nap.edu/catalog/9728/to-err-is-human-building-a-safer-health-system>
- The Joint Commission National Patient Safety Goals: <https://www.jointcommission.org/>
- Institute for Healthcare Improvement: <https://www.ihi.org/PatientSafety>
- The Leapfrog Group for Patient Safety: <http://www.leapfroggroup.org/>
- Agency for Healthcare Research and Quality: <https://www.ahrq.gov/>

## **Reportable Conditions**

Highmark Wholecare practitioners are contractually required to follow our QI programs, including, but not limited to, reporting certain diseases, infections, or conditions in accordance with 28 Pa. Code § 27.21a. Highmark Wholecare's Reportable Conditions Policy, QI-050-MC-ALL, has been established to detail this requirement, and the methods by which practitioners will be notified of its necessity.

To request additional information or to obtain a copy of the Reportable Conditions Policy,

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please contact our Provider Services Department at 1-800-685-5209. The regulations, which include the complete list of reportable conditions, can be found via the Pennsylvania Code website at <https://www.pacodeandbulletin.gov/>.

### **Medical Record Reviews**

From time to time, we will submit an ad hoc request for medical records. It is imperative that providers in our participating network respond to these requests within fourteen (14) business days, with the exception of Quality-of-Care cases which require a response within three (3) business days, as dictated per contractual obligations.

If we request medical records, the provider must provide copies of those records at no cost. This includes notifying any third party who may maintain medical records of this stipulation as well as the time constraints. These requests are made to comply with regulatory requirements, requests, audits, or for operational purposes (e.g., to investigate quality of care issues, complaints/grievances, or Serious Adverse Event cases).

In addition to providing medical records upon request, providers are required to transfer member medical records, or copies of records, to newly designated PCPs, specialists, or treatment facilities within fourteen (14) business days from receipt of the request from DHS, its agent, the member, or the member's new treating practitioner without charging the member.

Highmark Wholecare also annually conducts a review of our providers' medical records to ensure compliance with criteria as specified in the Medical Record Review Standards. The standards, which incorporate a core set of critical factors, were developed and approved by our Quality Improvement/Utilization Management Committee and adhere to regulatory requirements as prescribed by the National Committee for Quality Assurance (NCQA), State and federal agencies. These standards can be provided upon request or via the Highmark Wholecare website at:

<https://providers.highmark.com/wholecare/provider-resources/quality-improvement>.

A score of 80% is required to pass the medical record review; standards identified as critical are required to be present. Practitioners whose medical records do not comply may undergo remediation in the form of education and additional reviews. Continued non-compliance could result in possible practitioner sanctioning. Consistent and complete medical records documentation is an essential critical component of ensuring members quality of care. Accurate and concise documentation supports provider communication enhancing the continuity and coordination of care.

## **Potential Preventable Serious Adverse Events/Hospital Acquired Conditions and Never Events**

Quality of Care concerns (including Potential Preventable Serious Adverse Events, Hospital Acquired Conditions and Never Events) are identified by several internal and external mechanisms such as, but not limited to case management review, credentialing/recredentialing activities, claims payment retrospective review, utilization management case review, complaint and grievance review, fraud and abuse investigations, practitioner/providers, delegates, and State and/or federal agencies. Once a potential event has been identified an extensive review is conducted by our company's Quality Improvement and Medical Management Departments. The process includes, when necessary, a medical record review and possible telephonic or mail communication with the practitioner/provider. Once it has been determined if an actual event has been discovered, we will, when necessary, verify if payment denial or retraction needs to take place, and notify the practitioner/provider by mail if that is required. Should you have any questions, please contact the company's Provider Services Department at 1-800-685-5209.

## **Living Will Declaration Advance Directives**

The Omnibus Budget Reconciliation Act (OBRA) of 1990 included a new law that has come to be known as the Patient Self-Determination Act. It became effective on December 1, 1991.

The Patient Self-Determination Act applies to hospitals, nursing facilities, providers of home health care or personal care services, hospice programs and health maintenance organizations that receive Medicare or Medicaid funds.

The primary purpose of the act is to make sure that the beneficiaries of such care are made aware of advance directives and are given the opportunity to execute an advance directive if they so desire. The Act also prevents discrimination in health care if the member chooses not to execute an advance directive.

As a participating provider within the network, you are responsible for determining if the member has executed an advance directive and for providing education about advance directives when it is requested. While there is no specific governmentally mandated form, you can request a copy of a "Living Will" form from our Provider Services Department by calling 1-800-685-5209, or by visiting our website at:

[https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/Forms/MAMC\\_LivingWill.pdf](https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/Forms/MAMC_LivingWill.pdf).

A copy of the "Living Will" form should be maintained in the member's medical record. Medical Record Review Standards state that providers should ask members, age 21 and older, whether they have executed an advance directive and document the member's response in their medical records. Providers will receive educational materials regarding a member's right to advance directives upon entering the practitioner network.

## **Member Outreach**

Practitioners can request assistance from Case Management Services in the Clinical Operations Department to provide additional education to members who need further explanation on such issues as the importance of keeping scheduled appointments. Practitioners can refer members for additional education regarding living with their chronic conditions, adhering to their treatment plan, understanding their benefits, services, and resources available by completing a Member Outreach Form, which is located on the Highmark Wholecare website at:

<https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/Forms/Medicare%20Member%20Outreach%20Form.pdf>.

A Highmark Wholecare representative will contact the member and follow-up with the practitioner at the practitioner's request. For more information, or to request member outreach, please call our Clinical Operations Department at 1-800-685-5209. You can also fax the Member Outreach Form to the fax number (1-888-225-2360) listed on the Form.

## **Highmark Wholecare Practitioner Excellence (HWPE) Program**

Highmark Wholecare values the role practitioners play in serving our members and improving the health of Highmark Wholecare members. Through the Highmark Wholecare Practitioner Excellence (HWPE) program, we reward performance that demonstrates high quality, accessible, and efficient healthcare. Practice resources are provided such as the Highmark Wholecare Practitioner Excellence Incentive Program Guide, the HWPE Provider Webinar series, to educate providers on the program, and monthly Provider Performance Reporting. For more information about the HWPE program, who is eligible, and how to opt-in, visit the Highmark Wholecare website at <https://providers.highmark.com/wholecare/practitioner-excellence-program>.

## **Highmark Wholecare Practitioner Excellence Provider Performance Reporting**

Highmark Wholecare Practitioner Excellence (HWPE) Provider Performance Reporting is available to providers on a monthly cadence via the Highmark Wholecare Care Gap Management Application (CGMA). The provider reporting details provider performance in all of the incentivized HWPE program measures, as well as additional non-incentivized profiled measures. Providers, whether or not they have opted into the HWPE program, have the ability to view measure-specific performance and financial incentive opportunity within the CGMA. Opting into the HWPE program is necessary to receive financial incentives through the program.

Within the CGMA, providers are able to view their member-specific numerator compliance for each metric along with the member-specific opportunities for gaps yet to be closed. Providers also receive a scorecard that accompanies their HWPE program incentive payment, detailing the rate for each measure for which they have a denominator. The provider reporting and scorecard allow providers to gauge how closely they are performing against program benchmarks and year-over-year percentage point improvement.

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**Provider Engagement Team (PET)**

The Provider Engagement Team is a dedicated team of Clinical Transformation Consultants who partner with our Pennsylvania Medicare Providers to improve the overall outcomes of our members. The PET team provides information regarding best practices in quality improvement programs, information regarding performance compared to national benchmarks and peers, as well as assistance with achieving incentive goals for our Highmark Wholecare Practitioner Excellence pay-for-performance program. PET is a strategic partner with our providers in achieving their quality goals. Contact the Highmark Wholecare Provider Engagement Team at: [ProviderEngagementTeam@HighmarkWholecare.com](mailto:ProviderEngagementTeam@HighmarkWholecare.com)

## MEMBER

### Enrollment Eligibility

Our Medicare plans are designed to provide more than healthcare for those who qualify. Highmark Wholecare offers medical and prescription drug coverage, and all the benefits of Original Medicare, PLUS more benefits.

### Healthcare Options

#### Dual Eligible Special Needs Plans

Highmark Wholecare Medicare Assured Diamond (HMO SNP) and Highmark Wholecare Medicare Assured Ruby (HMO SNP) are Dual Eligible Special Needs Plans, (D-SNP); serving those who have BOTH Medicare Parts A and B and Medicaid (Medical Assistance) or assistance from the State and live within the 62 county Pennsylvania service area.

Refer to the chart below for eligibility criteria.

Enrollment Criteria	Medicare Assured Diamond	Medicare Assured Ruby
Must be entitled to Medicare Part A	Yes	Yes
Must be enrolled in Medicare Part B	Yes	Yes
Medicare eligibility may be due to either disability or age	Yes	Yes
Must be eligible for either: full Medicaid FBDE/QMB/QMB+/ SLMB+	Yes	No
Must receive the following level of assistance from the state: QI/SLMB	No	Yes

#### Dual Eligible Categories

- **Medicaid only (“Full Dual”)** - Individual who is eligible for full Medicaid benefits. Medicaid does not pay out-of-pocket costs for Part D cost-share.
- **Full Benefit Dual Eligible (FBDE)** - An FBDE individual is eligible for Medicaid either categorically or through optional coverage groups, such as medically needy or special income levels for institutionalized or home and community-based waivers.
- **QMB only (Qualified Medicare Beneficiary)** - Individual who is eligible for Medicaid payment of Medicare Cost-Share (i.e., Medicare Part A and/or Part B coinsurance, deductible, premium). Medicaid does not pay out-of-pocket costs for Part D cost-share.
- **QMB+ (Qualified Medicare Beneficiary)** - Individual eligible for full Medicaid benefits and Medicaid payment of Medicare cost-share (i.e., Medicare Part A and/or Part B coinsurance, deductible, premium). Medicaid does not pay for Part D cost-share.

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- **SLMB only (Special Low-Income Medicare Beneficiary)** - An individual eligible for Medicaid payment of Medicare Part B premium only. Medicaid does not pay out-of-pocket costs for Part D cost-share.
- **SLMB+ (Special Low-Income Medicare Beneficiary)** - An Individual eligible for full Medicaid benefits and Medicaid payment of Medicare Part B premium only.
- **QI (Qualifying Individual)** - An individual eligible for Medicare Part A. Individual is eligible for Medicaid payment of Medicare Part B premium only. Medicaid does not pay out-of-pocket costs for Part D cost-share.

### **The Enrollment/Disenrollment Process**

The Centers for Medicare and Medicaid Services (CMS) has periods when beneficiaries can enroll or dis-enroll with/from Medicare. These times are known as election periods. Please contact or direct the member to contact Highmark Wholecare for additional information about election periods. Members can enroll into our plan by using any of these methods:

- Mailing in a paper enrollment form
- Enrolling on-line through Medicare's website
- Enrolling on-line through Highmark Wholecare's website at <https://www.highmark.com/wholecare/medicare/enrollment>
- Downloading an enrollment form from the Highmark Wholecare website at <https://www.highmark.com/wholecare/medicare/enrollment> -Under 2026 Enrollment Forms, click on the appropriate state link to open the enrollment form, Download and mail completed forms.

For the mailing address, please refer to **Member Enrollment/Disenrollment** under the "Important Addresses" section on page 14.

- By calling Highmark Wholecare at 1-877-428-3929 (TTY users should call 711 or 1-800-654-5984).
- Working with their sales agent, Members of Special Needs Plans must meet specific eligibility requirements. Highmark Wholecare confirms the beneficiary's eligibility during the enrollment process.

Members can disenroll from our plan by:

- Sending Highmark Wholecare, a written request to disenroll.
- Contacting Highmark Wholecare and requesting a disenrollment form be sent to them.
- Contacting Medicare at 1-800-MEDICARE (1-800-633-4227) TTY users should call 1-877-486-2048 or [www.medicare.com](http://www.medicare.com).
- By enrolling in a new Medicare health plan.

For additional information, Members should call Highmark Wholecare or visit <https://www.highmark.com/wholecare/medicare>.

Member enrollments are made effective the first day of the calendar month, and member disenrollment's are through the end of the calendar month.

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## Member ID Cards

Each Highmark Wholecare member will receive an ID card. Each card is issued once, unless cards are requested or reissued due to a demographic, PCP or plan change.

ID Cards are good for as long as the person is a member of Highmark Wholecare.

(Sample Member ID cards)

<b>HIGHMARK WHOLECARE</b>	<b>Medicare Assured Diamond™ (HMO SNP)</b>	<b>HighmarkWholecare.com</b>
Member Name <b>MARY L SAMPLE</b>	Effective: <b>01/01/2023</b>	Member Services, Provider Services, or Pre-certification: <b>1-800-685-5209</b>
Member ID <b>Y6H12345678</b>	Copay: PCP <b>\$0</b> Specialist <b>\$0</b>	TTY Hearing Impaired Services: <b>711</b>
RXBIN: 004336 Issuer: 80840 RXPCN: MEDDADV RXGRP: RX2342	Primary Care Provider: <b>No PCP Selected</b>	24 Hour Nurse Line: <b>1-800-685-5209</b>
CMS-H5932 001	PCP Phone: <b>(555) 555-5555</b>	Providers should call <b>1-800-685-5209</b> to verify eligibility.
MEDICARE ADVANTAGE <b>HMO</b> MedicareR Prescription Drug Coverage X		Pharmacy Help Desk - for Pharmacist: <b>1-866-693-4620</b>
		BlueCard® Toll Free: <b>1-800-676-BLUE (2583)</b>
		Health benefits or health benefit administration may be provided by or through Highmark Wholecare, coverage by Gateway Health Plan, an independent licensee of the Blue Cross Blue Shield Association ("Highmark Wholecare").

<b>HIGHMARK WHOLECARE</b>	<b>Medicare Assured Ruby™ (HMO SNP)</b>	<b>HighmarkWholecare.com</b>
Member Name <b>MARY L SAMPLE</b>	Effective: <b>01/01/2023</b>	Member Services, Provider Services, or Pre-certification: <b>1-800-685-5209</b>
Member ID <b>Y6H12345678</b>	Copay: PCP <b>\$0</b> Specialist <b>\$30</b>	TTY Hearing Impaired Services: <b>711</b>
RXBIN: 004336 Issuer: 80840 RXPCN: MEDDADV RXGRP: RX2342	Primary Care Provider: <b>No PCP Selected</b>	24 Hour Nurse Line: <b>1-800-685-5209</b>
CMS-H5932 013	PCP Phone: <b>(555) 555-5555</b>	Providers should call <b>1-800-685-5209</b> to verify eligibility.
MEDICARE ADVANTAGE <b>HMO</b> MedicareR Prescription Drug Coverage X		Pharmacy Help Desk - for Pharmacist: <b>1-866-693-4620</b>
		BlueCard® Toll Free: <b>1-800-676-BLUE (2583)</b>
		Health benefits or health benefit administration may be provided by or through Highmark Wholecare, coverage by Gateway Health Plan, an independent licensee of the Blue Cross Blue Shield Association ("Highmark Wholecare").

Medicare Assured Diamond and Medicare Assured Ruby members age 21 and over residing in Pennsylvania will need to use their Highmark Wholecare ID card and keep their Medicaid (Medical Assistance) Access card to use for services covered under Medicaid and to cover Medicare deductibles and coinsurance, as long as the provider also participates with Medicaid.

Members under the age of 21 will use their Highmark Wholecare ID card and their Medicaid (Medical Assistance) HMO Plan ID card. These members will need to keep their Medicaid Access card for non-medical assistance services, such as transportation through the Medical Assistance Transportation Program (MATP) or cash assistance.

## **Determining Eligibility**

Because of frequent changes in a member's eligibility, each participating practitioner is responsible to verify a member's eligibility with Highmark Wholecare BEFORE providing services. Verifying a member's eligibility along with requesting the applicable referral or authorization will assure proper reimbursement for services. To verify a member's eligibility, the following methods are available to all practitioners:

1. Highmark Wholecare Identification Card  
The card itself does NOT guarantee that a person is currently enrolled in Highmark Wholecare. Members are only issued an ID card once upon enrollment, unless the member changes their primary care practitioner, requests a new card or card is reissued due to plan changes such as copayments. Members are NOT required to return their identification cards when they are no longer eligible.
2. NaviNet  
Providers can verify eligibility/benefits and check claim status via NaviNet. Providers also have the capability to submit certain authorization requests electronically via NaviNet.
3. The Interactive Voice Response System (IVR) is available twenty-four (24) hours a day, seven (7) days a week at 1-800-642-3515.
4. To verify member eligibility at each visit, practitioners may contact the plan directly at 1-800-685-5209. After remaining on the line, press 2 (Provider) to reach:
  - RX Pharmacy Services
  - IVR (Eligibility)
  - Provider Services
  - Utilization Management
  - Credentialing

NOTE: In an effort to better service our providers, please have your 10-digit NPI or 9-digit tax identification number available.

Providers follow a few simple steps once connected, which are listed below:

**Press 1** If you are calling regarding **Retail Pharmacy or Specialty Pharmacy questions**, you will be connected to Pharmacy Services.

**Press 2** If you are calling to **Verify Eligibility**, you will be connected to our 24/7 Interactive Voice Response System (IVR).

**Press 3** **If you are calling regarding Claims, to Verify Benefits**, on file questions, you will be connected to Provider Service.

**Press 4** **If you are calling regarding Authorization Requests**, you will be connected to Utilization Management.

**Press 5** If you are calling regarding **Behavioral Utilization Management**, you will be connected to Utilization Management.

**Press 6** If you are calling regarding **Credentialing Status**, you will be connected to Credentialing.

### **Primary Care Practitioner's Role in Determining Eligibility**

Primary care practitioners verify eligibility by consulting their panel listing in order to confirm that the member is a part of the practitioner's panel. The panel list is distributed on or about the first of every month. The primary care practitioner should check the panel list each time a member is seen in the office. If a member's name is on the panel list, the member is eligible with Highmark Wholecare for that month.

If a member insists that they are effective, but do not appear on the panel list, the provider should call the Provider Services Department for help in determining eligibility at 1-800-685-5209.

### **Benefits**

#### **Medical Benefits**

Highmark Wholecare members are eligible for all the benefits covered under the Original (Fee- for-service) Medicare Program. In addition, Highmark Wholecare offers additional benefits for dental, vision, hearing and health and wellness services (plan benefits vary by plan). For a complete list of covered benefits, please refer to the Evidence of Coverage booklet. A complete copy of the Evidence of Coverage booklet for each healthcare option is located on the Highmark Wholecare website at <https://www.highmark.com/wholecare/medicare/plans>.

Members obtain most of their healthcare services either directly from their primary care practitioner or upon prior authorization (approval in advance) by an in-network specialist/ancillary provider; except for services available on a self-referral basis, such as OB/GYN services and routine vision services. The primary care practitioner is responsible for the coordination of a member's healthcare needs and access to services provided by hospitals, specialty care practitioners, ancillary providers, and other healthcare providers as needed.

## **Evidence of Coverage**

The covered services listed in the Evidence of Coverage booklet are covered only when all requirements listed below are met:

- Medicare covered services must be provided according to the coverage guidelines established by CMS.
- Services (including medical care, services, supplies, and equipment) must be medically necessary. “Medically necessary” means that the services, supplies, or drugs are needed for the prevention, diagnosis, or treatment of the medical condition and meet accepted standards of medical practice.
- Care is received from a network provider. In most cases, care received from an out-of-network provider will not be covered. Chapter 3 of the Evidence of Coverage booklets provides more information about requirements for using network providers and the situations when Highmark Wholecare will cover services from an out-of-network provider.
- A primary care provider (PCP) is providing and overseeing care.

In addition, some services listed in the Benefits Chart (Chapter 4 of Evidence of Coverage booklet) are covered only if the network provider gets approval in advance (sometimes called “prior authorization”) from our company. Covered services that need approval in advance are marked in the Benefits Chart by an asterisk.

## **Case Management Programs**

Highmark Wholecare cares about our members’ health and well-being. We believe good service means doing our best to help members stay healthy, lead an active lifestyle, and improve members’ quality of life. Highmark Wholecare has special programs available for members to address asthma, heart disease, diabetes, and COPD as well as providing information about health education and wellness services such as smoking cessation. Case managers are available to assist members with resources, educational information and self-management planning (qualifications apply).

## **General Medicare Exclusions**

In addition to any exclusions or limitations described in the Evidence of Coverage, the following items and services are not covered except as indicated by Highmark Wholecare as described under Product offerings:

- Services considered not reasonable and necessary, according to the standards of Original Medicare.
- Experimental medical and surgical procedures, equipment and medications.
- Experimental procedures and items are those items and procedures determined by our plan and Original Medicare to not be generally accepted by the medical community. (May be covered by Original Medicare under a Medicare-approved clinical research study or by Highmark Wholecare.)
- Private room in a hospital. (Covered only when medically necessary)
- Personal items in a member’s rooms at a hospital or skilled nursing facility, such as a telephone or a television.
- Full-time nursing care in a member’s homes.
- Custodial care is care provided in a nursing home, hospice, or other facility setting when

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a member does not require skilled medical care or skilled nursing care.

- Homemaker services include basic household assistance, including light housekeeping or light meal preparation.
- Fees charged by a member's immediate relatives or household members.
- Cosmetic surgery or procedures. (Covered in cases of an accidental injury or for improvement of the functioning of a malformed body member. Covered for all stages of reconstruction for a breast after a mastectomy, as well as for the unaffected breast to produce a symmetrical appearance.)
- Routine dental care, such as fillings or dentures (Routine cleanings may be covered).
- Non-routine dental care. (Dental care required to treat illness or injury may be covered as inpatient or outpatient care.)
- Routine chiropractic care. (Manual manipulation of the spine to correct a subluxation is covered.)
- Orthopedic shoes. (Unless shoes are part of a leg brace and are included in the cost of the brace, or the shoes are for a person with diabetic foot disease.)
- Supportive devices for the feet. (Except for orthopedic or therapeutic shoes for people with diabetic foot disease.)
- Routine hearing exams, hearing aids or exams to fit hearing aids. (Exams to diagnose and treat hearing and balance issues may be covered)
- Radial keratotomy, LASIK surgery, vision therapy and other low vision aids. (Eye exam and one pair of eyeglasses (or contact lenses) are covered for people after cataract surgery.)
- Reversal of sterilization procedures and/or non-prescription contraceptive supplies.
- Naturopath services (uses natural or alternative treatments).
- Services provided to veterans in Veterans Affairs (VA) facilities. (However, when emergency services are received at VA hospital and the VA cost-sharing is more than the cost-sharing under Highmark Wholecare, we will reimburse veterans for the difference. Members are still responsible for Highmark Wholecare cost-sharing amount.)
- Surgical treatment for morbid obesity. (Unless it is considered medically necessary and covered under Original Medicare.)
- Private duty nurses.
- Meals delivered to members' homes. Some plans offer meals as a supplemental benefit.
- Elective or voluntary enhancement procedures, services (including weight loss, hair growth, sexual performance, athletic performance, cosmetic purposes, anti- aging and mental performance). (Except when medically necessary.) Any of the services listed above that are not covered will remain not covered even if received at an emergency facility.

At any time during the year, the Medicare program can change its national coverage. Since the plan covers what Original Medicare covers, we would have to make any change that the Medicare program makes. These changes could be to increase or decrease benefits, depending on the Medicare program change.

## **Prescription Drug Benefits**

Prescription drug benefits are available to all members. Prescriptions must be filled by a participating pharmacy to be covered by the plan. When a member travels outside of the plan service area, a national network of pharmacies is available via our Pharmacy Benefit Manager (PBM) network. If a member must use an out-of-network pharmacy, the member will generally have to pay the full cost of the prescription. The member may then request to be reimbursed for the cost covered by the plan. The plan contracts with CVS Health to develop a network of chain, independent, home infusion and long-term care pharmacies in order to provide pharmaceuticals to plan members. A list of participating pharmacies can be obtained by contacting the Plan's Pharmacy Department at 1-800-685-5209 or TTY: 711. Prescriptions are available to members who are eligible for pharmacy coverage when written by a plan practitioner. Prescription coverage and cost varies by plan.

## **Prescription Drug Coverage Formulary**

Visit the website below for the most recent version of the formulary.

<https://www.highmark.com/wholecare/medicare/benefits-programs/medication-benefits>

## **Co-payments/Co-insurance**

Member cost sharing for medications varies by plan, drug type and the amount of extra help, if any, that the member may receive. Members should contact Member Services or refer to their Evidence of Coverage to learn more about their specific coverage.

**Days Supplies of Medications:** The plan may place limits on the amount of medication a member may receive. Members can typically receive up to a 100-day supply of medication for prescriptions filled at an in-network pharmacy. A 100-day retail or mail order benefit is available for select plans. Some medications such as non-extended day supply drugs may be limited to a 30-day supply.

## **Prescription Benefit Design**

The plan utilizes a closed formulary with limitations on which medications are available for coverage. Practitioners are requested to prescribe medications included in the formulary whenever possible.

Some formulary medications may have additional requirements or limits on coverage. These requirements and limits may include prior authorization, quantity limits, or step therapy. If use of a formulary medication is not medically advisable for a member, you must complete a Medicare Request for Drug Coverage Form located on the Highmark Wholecare website at [https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/Forms/MC\\_NonformularyRequestForm.pdf](https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/Forms/MC_NonformularyRequestForm.pdf). Please refer to the Referrals and Authorizations Section of this manual for information regarding requesting non-formulary drugs.

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**Drugs Covered**

- Legend drugs listed in the closed formulary
- Non-formulary drugs which have been granted a formulary exception for an individual member
- Insulin/disposable syringes/needles
- Compounded medication of which at least one ingredient is a covered Part D prescription drug
- Contraceptives

**Drug Exclusions**

- A Medicare Prescription Drug Plan cannot cover a drug that would be covered under Medicare Part A or Part B.
- A Medicare Prescription Drug Plan cannot cover a drug purchased outside the United States and its territories.
- A Medicare Prescription Drug Plan can cover off-label uses (meaning for uses other than those indicated on a drug's label as approved by the Food and Drug Administration) of a prescription drug only in cases where the use is supported by certain reference-book citations. Congress specifically listed the reference books that list whether off-label use would be permitted. (These reference books are: American Hospital Formulary Service Drug Information and the DRUGDEX Information System.) If the use is not supported by one of these reference books, known as compendia, then the drug is considered a non-Part D drug and cannot be covered by our health plan.
- By law, certain types of drugs or categories of drugs are not normally covered by Medicare Prescription Drug Plans. These drugs are not considered Part D drugs and may be referred to as "exclusions" or "non-Part D drugs."

Non-Part D drugs include:

Non-prescription drugs (or over-the counter drugs)	Drugs when used for treatment of anorexia, weight loss, or weight gain
Drugs when used to promote fertility	Drugs when used for cosmetic purposes or to promote hair growth
Drugs when used for symptomatic relief of cough or colds	Prescription vitamins and mineral products, except prenatal vitamins and fluoride preparations
Covered outpatient drugs for which the manufacturer seeks to require that associated tests or monitoring services be purchased exclusively from the manufacturer as a condition of sale	Drugs, such as Viagra, Cialis, Levitra, and Caverject, when used for the treatment of erectile dysfunction

## **Members' Rights and Responsibilities**

Highmark maintains a Members' Rights and Responsibilities statement for all of its Medicare Assured products. The Members' Rights and Responsibilities statement is reviewed and revised annually, or as needed, and is distributed to new and existing members and practitioners. We do not and are prohibited from excluding or denying benefits to, or otherwise discriminating against, any eligible and qualified individual regardless of race, color, national origin, religious creed, sex, sexual orientation, gender identity, disability, English proficiency, or age. We monitor compliance related to members' rights and responsibilities, including those rights and responsibilities as defined by Section 1557 of the Affordable Care Act of 2010. Members can locate their Rights and Responsibilities in the Evidence of Coverage for the company's Medicare Assured Members under Chapter 8, "Your rights and responsibilities," or on our website at the following web address:  
<https://www.highmark.com/wholecare/medicare/plans>.

The company's Medicare Assured members have the right and responsibility to:

### **Member Rights**

- Receive information from Highmark in a way that works for them (in languages other than English, in Braille, in large print, or other alternative formats, etc.)
- Be treated with respect and dignity.
- Receive timely access to covered services and drugs.
- Have their personal health information kept private and confidential.
- Receive information from Highmark about the Plan, its network of providers, their covered services, as well as member rights and responsibilities.
- Have Highmark support their right to participate with practitioners in making decisions about their care.
- Understand their treatment options and participate in decisions for their health care
- To give instructions about what is to be done if they are not able to make medical decisions for themselves.
- To file a complaint and/or to ask Highmark to reconsider decisions the Plan has made by filing an appeal, including complaints about the quality of care.
- To receive more information about their rights.
- To make recommendations regarding the organization's Member Rights and Responsibilities policy.
- Members' choice to exercise these rights will not adversely affect the way Highmark, its providers, or any state or federal agency will treat them.
- To request and/or participate in a scheduled Interdisciplinary Care Team (ICT) meeting which may include your assigned Highmark Case Manager, your PCP, caregiver, and any other pertinent personnel directly included in your care.
- To access and have direct input into your individualized care plan (ICP). Your care plan is available on your portal page or can be mailed to you upon request.

## **Member Responsibilities**

- Get familiar with their covered services and the rules they must follow to get these covered services.
- Inform Highmark if they have any other health insurance coverage or prescription drug coverage in addition to their Highmark plan.
- Tell their doctor and other health care providers that they are enrolled in a Highmark plan.
- Help their doctors and other providers who care for them by providing needed information, asking questions, and following through on their care.
- To respect the rights of other patients and to act in a way that helps the smooth running of their doctor's office, hospitals, and other offices.
- Pay Medicare premiums, and any applicable copayments or late enrollment penalties.
- Notify Highmark if they move, regardless of whether it is outside or inside of the Highmark service area.
- Call Member Services for help if they have questions or concerns.

## **Member Satisfaction**

The Medicare Consumer Assessment of Healthcare Providers and Systems (CAHPS®1) measures member satisfaction annually through a national survey. The Centers for Medicare and Medicaid (CMS) requires health plans to use a certified Survey Vendor to conduct the survey, which is utilized by health plans to capture information about consumer-reported experiences with healthcare, and to identify areas to improve or maintain performance. Results are compared nationally across all Medicare Advantage Plans, are reported to regulatory entities, and count towards a health plan's CMS Medicare Star Rating. Each year, the survey is administered to a sample of members 18 or older following CMS CAHPS survey protocol, and reveals members' experiences with their health plan, healthcare providers, and services over the 6 months prior. Types of questions asked of members include, but are not limited to:

- Getting needed care
- Getting appointments and care quickly
- Health Plan customer service
- Care coordination
- Rating of Health Plan
- Rating of health care
- Getting needed prescription drugs
- Rating of drug plan
- Getting needed screens, tests and vaccines

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<sup>1</sup>"CAHPS® is a registered trademark of the Agency for Healthcare Research and Quality (AHRQ)"

# Highmark Wholecare Medicare Assured 2026 Provider Manual

## Community HealthChoices (CHC)

CHC is Pennsylvania's mandatory Medicaid managed care program for individuals eligible for both Medicaid and Medicare.

Highmark Wholecare Medicare Assured D-SNP Members will maintain access to care. As a valued provider, we want you to be aware that our Medicare Assured Dual Eligible Special Needs (D-SNP) members will not lose coverage due to the CHC Medicaid program. Members are eligible to receive D-SNP benefits if they receive both Medicaid and Medicare. The CHC Medicaid program does not, in any way, change or impact how members enrolled in Medicare D-SNP plans access care.

Key messages to communicate to Highmark Wholecare Medicare Assured D-SNP members:

- Members will not lose their Medicare coverage with Highmark Wholecare Medicare Assured when enrolled in CHC.
- No action is needed by Medicare Assured members and their Medicare coverage will continue uninterrupted.
- Members will continue to receive the same trusted quality of care from Highmark Wholecare.
- Highmark Wholecare Medicare Assured providers cannot refuse services to members because they do not participate with the CHC managed care organization (CHC-MCO).
- Highmark Wholecare Medicare Assured members may keep their existing primary care physician.

Billing Medicare and Medicaid: How it works under CHC

- Dually eligible participants continue to have all of the Medicare options they had prior to CHC, including Original Medicare and Medicare Advantage. A participant's Medicare coverage does not change unless the participant decides to change it.
- Medicare continues to be the primary payer for any service covered by Medicare. Providers should continue to bill Medicare for eligible services prior to billing Medicaid. CHC does not change the services that are covered by Medicare.
- Under CHC, all Medicaid bills for participants must be submitted to the participant's CHC-MCO, including bills that are submitted after Medicare has denied or paid part of a claim. Medicare and Medicaid providers no longer send these bills directly to the Pennsylvania Department of Human Services.
- Providers cannot bill dually eligible participants for Medicare cost sharing when Medicare or Medicaid do not cover the entire amount billed for a service delivered.
- Medicaid is the payer of last resort.
- Once Medicare and any of the patient's other health insurance coverages have paid or denied the claim, Medicaid can be billed for the remainder of the claim. This does not change under CHC.
- Participants must have access to Medicare services from the Medicare provider of their choice. The CHC MCO is responsible to pay any Medicare co-insurance and deductible amount, whether or not the Medicare provider is included in the CHC-MCO's provider network and whether or not the Medicare provider has complied with the prior authorization requirements of the CHC-MCO.

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- The CHC-MCO may not require prior authorization for services covered by Medicare. However, if the service is denied by Medicare or there is a limit on the service of Medicare, the CHC-MCO may require prior authorization for the equivalent Medicaid service, as long as the CHC-MCO has a prior authorization policy that was approved by the State.

Community HealthChoices Links to Fact Sheets

[CHC Fact Sheet](#)

[Adult Benefit Package](#)

[Long-Term Services and Supports Benefits Guide](#)

[Coordination with Medicare](#)

[Populations Served by CHC](#)

[Eligibility Verification System](#)

Should you have any questions about Community HealthChoices, please contact the Provider Services department at 1-800-685-5209.

## **COVERAGE ARRANGEMENTS**

All participating practitioners must ensure 24-hour, 7 days-a-week coverage for members. Coverage arrangements should be made with another Plan participating practitioner or practitioners who have otherwise been approved by the Plan. All encounters must be billed under the name of the rendering practitioner, not the member's assigned primary care practitioner. Reimbursement will be paid directly to the participating covering primary care practitioner.

Covering practitioners, whether participating or not, must adhere to all of the Plan's administrative requirements. Additionally, covering practitioners must agree not to bill the member for any covered services. The covering practitioner should report all calls and services provided to the member's primary care practitioner. To request approval of a non- participating covering practitioner, a non-participating authorization would need to be requested by the PCP through the UM Department. All encounters must be billed under the name of the rendering practitioner and all reimbursements will be paid directly to the covering practitioner. Participating practitioners will be held responsible for the actions of their non-participating coverage practitioners.

Primary care practitioners agree that, in their absence, timely scheduling of appointments for members shall be maintained.

### **Locum Tenens**

The plan recognizes that from time to time a provider or practice may need to utilize the services of a Locum Tenens to aid in practice coverage for its patient population. Offices should follow CMS regulations with regard to locum tenens – they are recognized for services up to a sixty (60) calendar daytime frame. During that time, claims are to be billed under the participating supervising/lead physician NPI number and group NPI number along with the appropriate modifier.

Once the sixty (60) calendar daytime frame has elapsed, if the locum provider's services are still needed, the provider should become an employee of the group and would be required to be credentialed.

## **PRIMARY CARE PRACTITIONER**

### **Verifying Eligibility**

Please refer to the Determining Eligibility section of this manual to review the various options for validating member eligibility. Both NaviNet and the plan's eligibility verification line are available 24 hours a day, 7 days a week. The Eligibility verification phone line can be reached at 1-800-642-3515.

### **Primary Care Practitioner (PCP) Selection**

Each member in a family has the freedom to choose any participating primary care practitioner, and a member may change to another primary care practitioner should a satisfactory patient-practitioner relationship not develop. A primary care practitioner agrees to accept a minimum number of Highmark Wholecare members, as specified by their practitioner agreement, to their patient panel at each authorized office location without regard to the health status or healthcare needs of such members and without regard to their status as a new or existing patient to that practice or location.

After reaching their contracted patient panel minimum the primary care practitioner may, upon sixty (60) days prior written notice to Highmark Wholecare, state in writing that they do not wish to accept additional members. The written request excludes members already assigned to the primary care practitioner's practice, including applications in process. The request must be submitted to Highmark Wholecare using the Practice/Provider Change Request form located on the provider website at

<https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/Forms/Practice%20Change%20Request%20Form.pdf>.

For the mailing address, please refer to **Practice Change Information** under the "Important Addresses" section on page 14.

Through Highmark Wholecare's model of Prospective Care Management (PCM®), we emphasize the importance of extensive member outreach, community involvement and physician practice engagement. We support the efforts of physician practices in delivering the highest quality of care to members.

### **Encounters**

Primary care practitioners are required to report all services they provide for Highmark Wholecare members by submitting complete and accurate claims. All providers are contractually required to submit encounters for all member visits and all charted diagnoses that the member may suffer from.

## **Accurate Submission of Encounter Data**

Encounter data provides the basis for many key medical management and financial activities at Highmark Wholecare:

- Quality of care assessments and studies
- Access and availability of service evaluation
- Program identification and evaluation
- Utilization pattern evaluation
- Operational policy development and evaluation
- Financial analysis and projection.

To manage member's health services effectively and efficiently, encounter submissions must be comprehensive and accurately coded. All providers are contractually required to submit encounters for all member visits.

Underreporting of encounters can negatively impact all stakeholders. For primary care practitioners, encounter data is essential as many of our Quality indicators are based on this information.

It is important that all diagnosis codes that are applicable to the member be submitted on every claim, especially chronic conditions. It is also important for the capturing of all quality performance measures that the use of CPTII codes be submitted on every claim when applicable. The expected rate of submission for encounters is 100%. Highmark Wholecare provides support and education to practices as indicated by their encounter submission rates.

CMS uses the Hierarchical Condition Categories (HCC) model to assign a risk score to each Medicare beneficiary. Accurate and complete reporting of diagnosis codes on encounters is essential to the HCC model. Physicians must establish the diagnosis in the medical record and coders must use the ICD-10-CM coding rules to record each diagnosis. Chronic illnesses should be coded on each encounter along with the presenting illness. This will help to ensure that CMS has complete data when determining the member's risk score.

## **Transfer of Non-Compliant Members**

Primary care practitioners agree (a) not to discriminate in the treatment of his/her patients, or in the quality of services delivered to Highmark Wholecare members on the basis of race, color, national origin, religious creed, sex, sexual orientation, gender identify, disability, English proficiency, age, place of residence, health status or source of payment; and to observe, protect and promote the rights of members as patients. Primary care practitioners shall not seek to transfer a member from his/her practice based on the member's health status.

However, a member whose behavior would preclude delivery of optimum medical care may be transferred from the practitioner's panel. The Plan's goal is to accomplish the uninterrupted transfer of care for a member who cannot maintain an effective relationship with a given practitioner. Should an incidence of inappropriate behavior occur, and transfer of the member is desired, the practitioner must send a letter requesting that the member be removed from his/her panel including the member's name and Highmark Wholecare ID Number to the Medicare Enrollment Department.

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For the mailing address, please refer to **Member Enrollment/Disenrollment** under the “Important Addresses” section on page 14.

The Enrollment Department notifies the requesting practitioner in writing when the transfer has been accomplished. If the member requests not to be transferred, the primary care practitioner will have the final determination regarding continuation of primary care services. Primary care practitioners are required to provide emergency care for any Highmark Wholecare member dismissed from their practice until the member transfer has been completed.

### **Transfer of Medical Records**

Primary care practitioners are required to transfer member medical records or copies of records to newly designated primary care practitioners within fourteen (14) business days from receipt of the request from the member or the member’s new primary care practitioner, without charging the member.

Primary care practitioners are required to transfer member medical record or copies of records to newly designated Managed Care Organizations within fourteen (14) business days from receipt of the request from the Centers for Medicare and Medicaid Services or its agent.

### **Telehealth**

Members have the option of receiving the below services either through an in-person visit or via telehealth. For telehealth services, a network provider that currently offers the service must be utilized. Telehealth providers must ensure alignment with “CMS Guidance on Medicare Marketing Activities section”.

Telehealth services offered by the plan include:  
Primary care physician (PCP) services  
Physician specialist services  
Individual sessions for mental health specialty services  
Individual sessions for psychiatric services

Prior authorization/plan approval required: No

## SPECIALTY CARE PRACTITIONER

### Verifying Eligibility

Please refer to the Determining Eligibility section of this manual to review the various options for validating member eligibility. The plan's eligibility verification line is available 24 hours a day, 7 days a week. The Eligibility verification phone line can be reached at 1-800-642-3515.

### Coordination of Care

The primary care practitioner is responsible for the coordination of a member's healthcare needs and access to services provided by specialists. Therefore, all members are encouraged to coordinate care with their primary care practitioner prior to receiving specialty services except for the services that can be accessed by self-referral.

The specialist is responsible for providing written correspondence to the member's primary care practitioner for continuity and coordination of care.

### Emergency Services

Federal and state regulations prevent us from requiring members to contact a primary care practitioner, specialist or the plan prior to seeking emergency care. The decision by a member to seek emergency care is based upon "prudent layperson" standard. Per CMS guidelines: "An **emergency medical condition** is a medical condition manifesting itself by acute symptoms of sufficient severity (including severe pain) such that a prudent layperson, with an average knowledge of health and medicine, could reasonably expect the absence of immediate medical attention to result in:

- Serious jeopardy to the health of the individual or, in the case of a pregnant woman, the health of the woman or her unborn child;
- Serious impairment to bodily functions; or
- Serious dysfunction of any bodily organ or part.

**Emergency services** are covered inpatient and outpatient services that are furnished by a provider qualified to furnish emergency services; and needed to evaluate or stabilize an emergency medical condition.

All Highmark Wholecare members are informed that they must contact their primary care practitioner for authorization prior to seeking treatment for non-life or limb threatening conditions in an emergency room. However, Highmark Wholecare realizes that there are situations when a member is under the care of a specialty care practitioner for a specific condition, such as an OB/GYN during pregnancy, and the member may contact the specialist for instructions. If a specialty care practitioner directs a member to an emergency room for treatment, the specialty care practitioner is required to immediately notify the hospital emergency room of the pending arrival of the patient for emergency services. The specialty care practitioner is required to notify the primary care practitioner of the emergency services within one (1) business day when the emergency room visit occurs over a weekend. Members should be directed to the closest appropriate emergency provider.

### **Transfer of Medical Records**

Specialty care practitioners are required to transfer member medical records or copies of records to newly designated primary care practitioners within fourteen (14) business days from receipt of the request from the member or the member's new primary care practitioner, without charging the member.

Specialty care practitioners are required to transfer member medical records or copies of records to newly designated Managed Care Organizations within fourteen (14) business days from receipt of the request from the Centers for Medicare and Medicaid Services or its agent.

### **Telehealth**

Members have the option of receiving the below services either through an in-person visit or via telehealth. For telehealth services, a network provider that currently offers the service must be utilized. Telehealth providers must ensure alignment with "CMS Guidance on Medicare Marketing Activities section".

Telehealth services offered by the plan include:  
Primary care physician (PCP) services  
Physician specialist services  
Individual sessions for mental health specialty services  
Individual sessions for psychiatric services

Prior authorization/plan approval required: No

## **OB/GYN SERVICES**

### **Verifying Eligibility**

Please refer to the Determining Eligibility section of this manual to review the various options for validating member eligibility. The plan's eligibility verification line is available 24 hours a day, 7 days a week. The Eligibility verification phone line can be reached at 1-800-642-3515.

### **General Information**

To eliminate any perceived barrier to accessing OB/GYN services, Highmark Wholecare allows all female members to self-refer to any participating OB/GYN for any OB/GYN- related condition, not just for an annual exam or suspected pregnancy. When a member self-references to the OB/GYN, the OB/GYN's office is required to contact Highmark Wholecare to verify eligibility of the member.

Highmark Wholecare permits its primary care practitioners to perform routine gynecological exams and pap tests and provide care during pregnancy if they are so trained and equipped in their office.

As you are caring for our members, and you feel additional support or assistance is needed, please refer members to the Care Management Department for ongoing Case Management and support. To refer back to the Care Management Department, please call 1-800-685-5209.

### **Obstetrical Needs Assessment Form**

The first visit with an obstetrical patient is considered to be the intake visit, or if a patient becomes a Highmark Wholecare member during the course of her pregnancy, her first visit as a Highmark Wholecare member is considered to be her intake visit. At the intake visit, an Obstetrical Needs Assessment Form (ONAF) must be completed. The form can be found on the Highmark Wholecare website at

[https://content.highmarkprc.com/Files/Wholecare/Forms/PAMA\\_ONAFForm.pdf](https://content.highmarkprc.com/Files/Wholecare/Forms/PAMA_ONAFForm.pdf)

Submission of the ONAF form can be done in 2 ways for a Highmark Wholecare member.

1. Secure Fax to 1-888-225-2360
2. Pennsylvania providers are able to submit the ONAF via the online submission process by logging in [here](#). For Instructions on setting up and using the online submission tool please view the "OB User Guide" which is located on the Highmark Wholecare website at <https://content.highmarkprc.com/Files/Wholecare/Forms/obcare-user-guide.pdf>.

The ONAF should be updated at the 28–32-week visits and also at the post-partum visit. These two updates should also be faxed or sent through the online submission tool to Highmark Wholecare immediately following completion as noted above.

The purpose of the Obstetrical Needs Assessment Form is to help identify risk factors early in the pregnancy and engage the woman in case management. For that reason, the Obstetrical Needs Assessment Form must be faxed to Highmark Wholecare's MOM Matters® Department

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within 2-5 business days of the intake visit and at least thirty (30) days prior to delivery.

**Diagnostic Testing**

Fetal Non-stress Tests and Ultrasounds can be performed in the OB/GYN's office or at a hospital without an authorization from Highmark Wholecare.

**Telehealth**

Members have the option of receiving the below services either through an in-person visit or via telehealth. For telehealth services, a network provider that currently offers the service must be utilized.

Telehealth services offered by the plan include:

Primary care physician (PCP) services

Physician specialist services

Individual sessions for mental health specialty services

Individual sessions for psychiatric services

Prior authorization/plan approval required: No

## **BEHAVIORAL HEALTH SERVICES**

### **Verifying Eligibility**

Please refer to the Determining Eligibility section of this manual to review the various options for validating member eligibility. The plan's eligibility verification line is available 24 hours a day, 7 days a week. The Eligibility verification phone line can be reached at 1-800-642-3515.

### **Authorizations and Referrals**

#### **Inpatient Services**

In the case of an emergent admission when care cannot be coordinated on a pre-service basis, the Highmark Wholecare admitting physician, hospital or member is encouraged to notify the Utilization Management Department as soon as possible of the inpatient admission. Notification facilitates coordination of care management, quality issues and discharge planning. Highmark Wholecare will perform inpatient level of care reviews to establish medical necessity if inpatient request is received within (4) calendar days of discharge. Admission requests made outside this timeframe must be submitted through retrospective review.

#### **Outpatient Services**

- Highmark Wholecare does not require participating providers to obtain a referral or authorization for most outpatient mental health or substance use disorders covered by Medicare.
- Outpatient Behavioral Health services requiring authorization include:
  - Partial Hospitalization (PHP)
  - Electroconvulsive Therapy (ECT)
  - Transcranial Magnetic Stimulation (TMS)
  - Neuropsychological / Psychological Testing
  - Services provided by a non-participating provider
  - Highmark Wholecare will perform outpatient reviews to establish medical necessity
  - Outpatient authorizations must be requested within 1 business day. Authorization requests made outside of this timeframe must be submitted through retrospective review.

#### **Substance Use Disorder (SUD) Services**

- Authorization is required for the below:
  - ASAM level of care 4 WM: Medically Managed Intensive Inpatient Withdrawal Management
  - ASAM level of care 4: Medically Managed Intensive Inpatient Services
  - ASAM Level of Care 2.5 Partial Hospitalization
  - ASAM Level of Care 2.1 Intensive Outpatient

Failure to obtain timely authorization may result in a denial of payment. Authorization requests can be submitted online through our GuidingCare authorization portal, which is assessed via NaviNet. If the portal is unavailable, providers can contact our Utilization Management Department at 1-800-685-5209. For services not covered by Medicare; the services may be

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covered by the member's county –specific behavioral health plan.

### **Medical Necessity**

If the behavior status does not meet the medical necessity for the proposed level of care, the request is referred to the Behavior Health Medical Director, a board-certified Psychiatrist, for review and determination. The current medical necessity criteria being used for behavioral health services are Optum InterQual., Centers for Medicaid and Medicare Services National Coverage Determinations, Local Coverage Determinations, and the American Society of Addiction Medicine. Members may seek emergent care for behavioral health and/or substance use.

A mental health crisis may or may not be a life-threatening situation in which a person is exhibiting extreme emotional or behavior disturbance and a comprised ability to function, which could result in suicidal or homicidal thoughts or actions.

Emergency services are covered if furnished by qualified providers and are needed to evaluate or stabilize an emergent behavior health crisis.

### **Crisis Resources**

- The National Suicide Prevention Lifeline, where compassionate, accessible care and support is available for anyone experiencing mental health-related distress – whether that is thoughts of suicide, mental health or substance use crisis, or any other kind of emotional distress. People can also dial 988 if they are worried about a loved one who may need crisis support.
- The existing number for the National Suicide Prevention Lifeline (1-800-273-8255) is still active. Using either number will get people to the same services.
- The Lifeline is free, confidential, available 24/7, and can be reached by both phone call (multiple languages) and text (English only). The Lifeline currently serves TTY users either through their preferred relay service or by dialing 711, then 1-800-273-8255.
- Additionally, the Lifeline is available through chat by visiting <https://suicidepreventionlifeline.org/chat>.

### **Telehealth**

Members have the option of receiving the services below either through an in-person visit or via telehealth. For telehealth services, a network provider that currently offers the service must be utilized. Telehealth providers must ensure alignment with "CMS Guidance on Medicare Marketing Activities section".

Telehealth services offered by the plan include:

Primary care physician (PCP) services

Physician specialist services

Individual sessions for mental health specialty services

Individual sessions for psychiatric services

Prior authorization/plan approval required: No

## **Substance Use Disorder (SUD) Services**

### **Opioid Treatment Programs (OTPs)**

Members may receive treatment for opioid use disorder at Opioid Treatment Programs (OTPs). Treatment services include drugs approved by the Food and Drug Administration (FDA) for the treatment of opioid use disorder, dispensing and administration of opioid agonist and antagonists including naloxone, toxicology testing, individual and group therapy, counseling, intake activities, and periodic assessments. These services are covered through bundled Part B codes where, for dually eligible individuals, Medicare is the primary payer and Medicaid is the payer of last resort. As such, providers are to bill Medicare for OTP services provided to dually eligible individuals before billing the Medicaid program.

For more information, please see the following resources:

- Our Payment Policy for Opioid Treatment Providers (OTPs)  
<https://content.highmarkprc.com/Files/Wholecare/PaymentPolicies/OpioidTreatmentProvidersPolicy.pdf>
- Centers for Medicare & Medicaid Services OTP Webpage  
<https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/Opioid-Treatment-Program>

### **Opioid Use Disorder Centers of Excellence (OUD-COEs)**

Members may be able to access treatment and case management services for Opioid Use Disorder (OUD) through one of the Pennsylvania Opioid Use Disorder Centers of Excellence (OUD-COEs). OUD-COEs are a care management program charged with identifying and engaging with Pennsylvania Medicaid recipients with OUD to ensure they are adequately supported in achieving optimal health. OUD-COEs support and coordinate whole-person care including both treatment needs (e.g., physical and behavioral health care, substance use disorder treatment) and non-treatment needs (e.g., social determinants of health). OUD-COEs provide hand-in-hand support to the clients that they serve with an overarching expectation of rapid identification and engagement (including taking referrals 24 hours per day, seven days per week) mobile response capacity, timely assessments, and timely and coordinated referrals.

To search for OUD-COEs by county, visit

<https://www.dhs.pa.gov/Services/Assistance/Pages/Centers-of-Excellence.aspx>

### **Additional Resources for Substance Use Disorder (SUD) Treatment**

- SAMHSA National Helpline: 1-800-662-HELP (4357)
- Addiction Treatment Locator, Assessment and Standards (ATLAS) Platform  
[www.TreatmentATLAS.org](http://www.TreatmentATLAS.org)
- National Treatment Locator for Substance Use Disorders (SUDs)  
[www.FindTreatment.gov](http://www.FindTreatment.gov)
- Local Single County Authorities (SCAs)  
<https://www.ddap.pa.gov/Get%20Help%20Now/Pages/County-Drug-and-Alcohol-Offices.aspx>

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**Screening, Brief Intervention, and Referral to Treatment (SBIRT) Billing Guide**

Screening, Brief Intervention, and Referral to Treatment (SBIRT) is a comprehensive and integrated public health approach to the delivery of early intervention and treatment services through universal screening for persons with substance use disorders (SUD) and those at risk of developing these disorders. These services are not intended to treat members already diagnosed with substance use disorder or those members already receiving substance use disorder treatment services. Highmark Wholecare compensates providers for completing SBIRT screenings in physical healthcare settings. By universally screening their patient population at annual visits, healthcare professionals can assist patients who may not be seeking care for substance use, but whose substance use behaviors may be inhibiting their social, professional, emotional, or physical well-being. Patients receiving regular SBIRT screenings demonstrated significant reductions in substance use. The purpose of this guide is to provide education and billing guidance to providers to obtain reimbursement for SBIRT services. This guide will be updated periodically to reflect changes based upon industry standards and practice. Highmark Wholecare reserves the right to conduct post-payment medical record audits for validation purposes and in accordance with state and federal accreditation, your provider agreement, and regulatory requirements.

For more information on substance use disorders and access to the SBIRT Billing Guide please visit:

[https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/PaymentPolicies/SBIRT\\_Reimbursement\\_BS.pdf](https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/PaymentPolicies/SBIRT_Reimbursement_BS.pdf)

## **HOSPITAL SERVICES**

### **Inpatient Admissions**

In order for Highmark Wholecare to monitor the quality of care and utilization of services by our members, all practitioners are required to obtain an authorization number for all hospital admissions by contacting the Utilization Management Department via our GuidingCare authorization portal, accessed via NaviNet. If for some reason GuidingCare is unavailable, providers can contact our Utilization Management Department at 1-800-685-5209. In the event services are needed urgently or emergently, authorizations must be requested within (4) calendar days of discharge. Admission requests made outside of this timeframe must be submitted through retrospective review.

Failure to obtain timely authorization for scheduled care may result in the administrative denial of your claim without regard to medical necessity. Claims submitted for non-emergent care without prior authorization will be denied.

Highmark Wholecare will accept an inpatient authorization request from the primary care practitioner, ordering practitioner, the attending practitioner or the hospital's Utilization Review Department for both emergent and non-emergent hospital care; however, no party should assume the other has obtained authorization.

The Utilization Management Representative refers to a Highmark Wholecare Medical Director if criteria or established guidelines and/or policies are not met for a determination.

In the case of an emergent admission when care cannot be coordinated on a pre-service basis, the Highmark Wholecare admitting physician, hospital or member is encouraged to notify the Highmark Wholecare Utilization Management Department as soon as possible of the inpatient admission. Notification facilitates coordination of care management, quality issues and discharge planning. Highmark Wholecare will perform inpatient level of care reviews to establish medical necessity. Authorization requests made after the care has been completed (post service/post discharge) must be submitted as an appeal once a claim denial has been received. Utilization Management will not accept post service authorization requests.

During the discharge planning process, if Highmark Wholecare is notified by the Quality Improvement Organization (QIO) that the member disagrees with the attending physician's discharge, a written detailed notice of discharge will be provided to the member through a process agreed upon by the hospital and Highmark Wholecare and will be provided to the member within the timeframes established by CMS.

### **Emergency Room**

Members are informed through the Evidence of Coverage how and when to utilize emergency services. Emergency services do not require prior authorization. If a member is unsure whether to go to the emergency room, the member is instructed to call his/her primary care practitioner for advice.

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**Ambulance Services**

Emergent ambulance transport does not require prior authorization. Non-emergent ground ambulance transport by a participating provider does require prior authorization; as well as for non-emergent ground ambulance transport by a non-participating provider except as noted below.

Highmark Wholecare considers non-emergent transportation as transportation for a patient that does not require immediate access to medical or behavioral health care and/or if not provided would not result in a medical or a behavioral health crisis.

Non-emergent transportation may include the following scenarios:

- Ambulance transports from one facility to another when the member is expected to remain at the receiving facility, which may include the following:
  - Hospital to Skilled Nursing Facility (SNF)
  - SNF to Hospital (non-emergent)
  - Hospital to Rehabilitation Facility
  - Rehabilitation Facility to Hospital (non-emergent)
- Ambulance transport to home upon discharge (if medically necessary).

Highmark Wholecare considers emergent transportation as transportation that allows immediate access to medical or behavioral health care and without such access could precipitate a medical or a behavioral health crisis for the patient. Either a participating or non-participating ambulance provider may render 911 transportation or transport to a psychiatric facility for a member under a psychiatric commitment order without authorization from Highmark Wholecare.

Highmark Wholecare also considers the following situations emergent, and thus does not require authorization when rendered by a Highmark Wholecare participating ambulance provider:

- ER to ER
- ER to Acute Care or Behavioral Health Facility
- Acute Care to Acute Care or Behavioral Health Facility
- Hospital-to-Hospital (when a patient is being discharged from one hospital and being admitted to another)
- \*End Stage Renal Dialysis Center

Providers should bill the above types of transports with the appropriate non-emergent, basic life support code and the modifier HH.

\*Ambulance transportation by non-participating providers to End Stage Renal Dialysis Centers does not require authorization. Although there is no pre-authorization required for participating or non-participating ambulance transport for a member with ESRD for dialysis services, the ambulance transport must meet Medicare's medical necessity program coverage criteria in order for payment to be made.

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Authorization for non-emergent air ambulance transportation is required by Highmark Wholecare's Utilization Management Department. These authorization requests should be submitted via our GuidingCare authorization portal, accessed via NaviNet. If for some reason GuidingCare is unavailable, providers can contact our Utilization Management Department at 1-800-685-5209. A Highmark Wholecare participating Ambulance provider should be contacted to render non-emergent transportation when possible.

Ambulance transportation from one facility to another for diagnostic testing or services not available at the current facility, with the expectation of the member returning to the original facility upon completion of service, is the responsibility of the originating facility and does not require an authorization from Highmark Wholecare.

The originating facility should assume the cost for this type of transport even if for unforeseen circumstances, the member remains at the receiving facility. The originating facility may contact any ambulance service of their choosing to provide transport in this scenario only.

### **DRG Post-Payment Audits**

Our Company or a designated delegate conducts monthly post-payment reviews of inpatient claims to verify the accuracy of DRG payments.

For reviews conducted by a designated delegate, you should expect the following:

- You will receive a letter requesting records for specific paid claims.
- You will have thirty (30) calendar days to provide the requested medical records for review.
- Failure to submit the requested records may result in an administrative denial by our company and recoupment of the original payment.
- You will receive a determination letter from the delegate describing the outcome of the medical records and claim review.
- You will have thirty (30) calendar days to either accept the delegate's findings or request a reevaluation by providing supporting information for the paid claims to the delegate.
- If you disagree with the delegate's reevaluation, our Medical Director can review your supporting information to make a final determination.
- If you do not respond to these notifications, we will proceed with a payment adjustment.

Questions should be directed to our Fraud, Waste and Abuse Hotline by calling 1-844-718-6400.

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### **Technical Denials**

Technical Denial determinations are not subject to reconsideration and further appeals but may be subject to re-review/reopening. These types of denials include:

- Medical record not being submitted timely (42 CFR 476.90(b)); and
- Billing errors including cost outlier denials due to duplicative billing for services or for services not actually furnished or not ordered by the physician.

You will receive correspondence from us indicating the specific claims and required documents required for review. If you do not respond to these notifications, we will proceed with a payment adjustment.

Questions regarding Technical Denials should be directed at Highmark Wholecare's Financial Investigations and Provider Review Division by calling our Fraud, Waste and Abuse Hotline at 1-844-718-6400.

### **Important Reminders Regarding the Submission of Implant Invoices**

In an effort to assist providers in receiving appropriate compensation for implant services and/or high-cost pharmaceuticals, it is imperative that providers abide by the following claim and invoice submission guidelines when submitting their claims for reimbursement unless otherwise specified in the provider's contract.

Outlined below are some important reminders and steps that are often overlooked which can lead to delayed payments and claim denials for implant services and/or high-cost pharmaceuticals.

When submitting an implant service claim and/or high-cost pharmaceuticals, we ask that providers follow the important guidelines noted below:

- The original claim must be submitted timely, and services must be billed in accordance with the facility's contract terms.
  - Please ensure the patient's name and ID number are on every page associated with the claim that needs to be paid.
  - Please circle the number of units and cost associated with the services to be paid and provide a breakdown of the costs if necessary.
- Providers may fax the implant and/or high-cost pharmaceuticals invoice to 1-844-207-0334 for processing. When submitting via fax, please include the following:
  - The fax cover sheet must include the phrase "Implant Invoice Claim" or "High-Cost Pharmaceuticals" in the subject line.
  - A copy of both the claim and the invoice must be included in the fax.
  - The implant revenue/HCPCS code and applicable supporting medical notes.
  - A copy of the packing slip with the patient's name circled should also be included.

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Additional reminders to facilities when submitting claims that include implant invoices:

- All claims, including implant invoices are subject to timely filing and follow up guidelines as well as the Highmark Wholecare coding edits.
- Providers will either submit a corrected claim with the invoice attached, or mail or fax required documentation via the Claims Review process with a copy of the original or corrected UB claim form, or the denied remit from the original claim
- Providers MUST follow the Appeals Process if it is felt that the denial of the claim is incorrect.
- If the surgery is denied, the implant charges will also be denied.
- Date of Service, Billed Charges, etc. must match that of the invoice.
- Providers should expect to receive payment within approximately 40 days after submission of a clean claim and invoice. Provider Services can provide assistance with inquiries on those claims and invoices that have been submitted but have received no response.

If there are any questions regarding this process, please do not hesitate to contact your Provider Account Liaison.

## **Accessibility to Care (Appointment Standards)**

Highmark Wholecare maintains accessibility to care standards and processes for ongoing monitoring of access to health care. Providers are contractually required to conform to these standards to ensure that health care services are provided to our members in a timely manner.

<b>PROVIDER TYPE</b>	<b>APPOINTMENT TYPE</b>	<b>ACCESS STANDARD</b>
<b>Primary Care (PCP) Behavioral Health (BH)</b>	<b>Emergent Care</b>	<b>Immediately seen or referred to an emergency facility</b>  Practice sites will be able to schedule an appointment immediately or refer the member to an emergency facility.
<b>Primary Care (PCP) Behavioral Health (BH)</b>	<b>Urgent Care</b>	<b>Immediately seen or scheduled within 24 hours</b>  Practice sites will be able to schedule an appointment either immediately or within 24 hours of being contacted by member.
<b>Primary Care (PCP) Behavioral Health (BH)</b>	<b>Non-Urgent, but in need of medical attention</b>	<b>Within 7 business days</b>  Practice sites will be able to schedule an appointment within 7 business days of being contacted by member.
<b>Primary Care (PCP) Behavioral Health (BH)</b>	<b>Routine or Preventative Care</b>	<b>Within 30 business days</b>  Practice sites will be able to schedule an appointment within 30 business days of being contacted by member.

The above appointment standards and other accessibility resources are located on our provider website at <https://providers.highmark.com/wholecare/provider-resources/accessibility-to-care-standards>.

## **POLICIES AND PROCEDURES**

Highmark Wholecare has developed policies and procedures to provide guidelines for identifying and resolving issues with practitioners who fail to comply with the terms and conditions of the applicable Practitioner Agreement, policies and procedures, or accepted Utilization Management Standards and Quality Improvement Guidelines.

### **Policy Changes**

In order for Highmark Wholecare to be in compliance with federal and state laws, regulations and regulatory bulletins governing the Medicare and Medicaid Programs in the course of providing services, providers and their staff will be bound by all applicable federal and state Medicare and Medicaid laws and regulations. Providers will comply with all applicable instructions, bulletins and fee schedules promulgated under such laws and all applicable program requirements of regulatory agencies regarding the Medicare and Medicaid programs. Additionally, providers need to be aware that no regulatory order or requirement of the Centers for Medicaid and Medicare, Departments of Insurance, Health or Human Services shall be subject to arbitration with the Plan.

### **Practitioner Education and Sanctioning**

Highmark Wholecare practitioners will be monitored for compliance with administrative procedures, guidelines, trends of inappropriate resource utilization, potential quality of care concerns and compliance with medical record review standards. Practitioner education is provided through Provider Engagement staff, Provider Account Liaisons and our Medical Directors. The company follows a tiered approach to education and sanctioning prior to implementing termination procedures. Network practitioners who do not improve through the provider education process will be referred to the Quality Improvement/Utilization Management Committee for evaluation and recommendations. Recommendations may include remediation or practitioner sanctioning.

Examples of repeated practitioner conduct that may be further reviewed for education and remediation include, but are not limited to:

- Member complaints
- Reported occurrences of excluding or denying health care services to a member based on his or her race, color, national origin, religious creed, sex, sexual orientation, gender identity, disability, English proficiency or age
- Failure to obtain prior authorization for a referral to a non-participating practitioner
- Failure to obtain prior authorization for those services requiring such
- Utilization management trends exceeding the peer group
- Quality indicator outcomes below the peer group
- Identification of Severe Quality of Care concerns
- Failure to cooperate with administrative aspects of the QI/UM Program
- Failure to provide adequate practitioner coverage
- Failure to be accessible to members via telephone or answering services

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- Repeated failure to be compliant with the established accessibility standards
- Repeated failure to comply with Environmental Assessment standards

Highmark Wholecare conducts ongoing monitoring of Medicaid and Medicare sanction information by utilizing the OIG report, CMS Preclusion Listing, and the DHS Medicheck Sanctions report. If a participating provider is found in the reports, the provider's file is pulled for further investigation and presented to the QI/UM Committee for a decision. Upon notification from DHS that a provider has been terminated due to loss of licensure and/or criminal convictions, Highmark Wholecare will immediately move forward with terminating the provider from its network. The effective date of termination will be the same date utilized by DHS.

### **Practitioner Due Process**

We have established a policy and procedure to define the situations when due process procedures are afforded to practitioners, and to specify the due process procedures available in accordance with federal and state regulations, in particular the Health Care Quality Improvement Act of 1986. The Practitioner Due Process Policy will be updated in accordance with federal and state regulations, and will indicate the appropriate procedures to notify new applicants and participating practitioners whenever:

- Credentialing or recredentialing applications are denied.
- Adverse determinations are made regarding participation.
- Action to suspend or terminate an agreement occur.
- A participating physician or healthcare practitioner is being terminated due to quality-of-care concerns or other conduct.

A physician or healthcare practitioner has the right to request a hearing in the event he or she receives a proposed Professional Review Action as recommended by the Plan's Quality Improvement/Utilization Management Committee.

### **Title VI of the Civil Rights Act Of 1964**

Providers are expected to comply with the Civil Rights Act of 1964. Title VI of the Act pertains to discrimination on the basis of national origin or limited English proficiency. Providers are obligated to take reasonable steps to provide meaningful access to services for members with limited English proficiency, including provision of translator services as necessary for these members.

### **Section 1557 of the Affordable Care Act Of 2010**

Providers are expected to comply with the Affordable Care Act of 2010. Section 1557 prohibits discrimination on the basis of race, color, national origin, religious creed, sex, sexual orientation, gender identity, English proficiency, age of a disability in certain health programs and activities.

### **Access and Interpreters for Members with Disabilities**

Providers are expected to address the need for interpreter services in accordance with the Americans with Disabilities Act (ADA). Each practitioner is expected to arrange and coordinate interpreter services to assist members who are hearing impaired. Highmark Wholecare will assist practitioners in locating resources upon request. The Plan offers the Member Handbook and other information in large print, Braille, on cassette tape, or computer diskette at no cost to the member. Please instruct members to call Member Services at 1-800-685-5209 to ask for these other formats. Practitioner offices are required to adhere to the Americans with Disabilities Act guidelines, Section 504, the Rehabilitation Act of 1973 and related federal and state requirements that are enacted from time-to-time. For interpreter services, please contact a qualified medical interpretation service or Language Line Services. Practitioner offices can contact the AT&T Language Line at 1-800-874-9426 for assistance with Limited English Proficient (LEP) patients at 711 or 1-800-654-5988 for patients with hearing impairments.

### **Confidentiality**

Through contractual agreements, all practitioners and providers have agreed to abide by all policies and procedures regarding member confidentiality. The performance goal for confidentiality is for practitioners to secure patient records from unauthorized access.

Under these policies, the practitioner or provider must meet the following:

- Provide the highest level of protection and confidentiality of members' medical and personal information used for any purposes in accordance with federal and state laws or regulations. This includes implementing policies and procedures for managing access to and use of race, ethnicity, preferred language, sexual orientation, and gender identity/preference data.
- Assure that member records, including information obtained for any purpose, are considered privileged information and, therefore, are protected by obligations of confidentiality.
- Assure that a member's individually identifiable health information as defined by HIPAA, also known as Protected Health Information (PHI), necessary for treatment, payment, or healthcare operations (TPO), is released to Highmark Wholecare without seeking the consent of a member, unless federal or state laws require express written consent. This information includes PHI used for claims payment, continuity and coordination of care, accreditation surveys, medical record audits, treatment, quality assessment and measurement, quality of care issues, and disease management. We follow the requirements of HIPAA and limit our requests to the amount of PHI that is minimally necessary to meet the payment, treatment, or operational function. All other requests for release of or access to PHI will be handled in accordance with federal and state regulations.
- Environmental security of confidential information is conducted by all providers and practitioners treating our members. This includes both internal and external monitoring of practice and provider sites. Provider and practitioner sites must comply with the Environmental Assessment standards that require that patient records be protected from public access.

## **Fraud, Waste and Abuse (FWA)**

We have a comprehensive policy for handling the prevention, detection and reporting of fraud, waste and abuse (FWA). It is our policy to investigate any actions by members, employees or practitioners that affects the integrity of the Plan and/or the Medicare Program. We enforce all industry standard claim coding requirements including those from NCCI, AMA CPT, ICD-10-CM, NCDs LCDs, and HCPCS. Providers are responsible for knowing the following FWA definitions as applicable to Medicaid and Medicare:

- **Fraud:**  
An intentional deception or misrepresentation made by an entity or person with the knowledge that the deception could result in some unauthorized benefit to the entity, him/herself, or some other person in a managed care setting. Fraud can be committed by many entities, including a health plan, a subcontractor, a provider, a state employee, or a member among others.
- **Waste:**  
Overutilization of services, or other practices that, directly or indirectly, result in unnecessary costs.
  - Waste is generally not considered to be caused by criminally negligent actions but rather the misuse of resources.
- **Abuse:**  
Any practices that are inconsistent with sound fiscal, business, or medical practices, and result in unnecessary costs to the Medicaid/Medicare Programs, or in reimbursement for services that are not medically necessary or that fail to meet professionally recognized standards or contractual obligations (including the terms of the RFP, Medicaid contracts, Medicare manuals, and the requirements of state or federal regulations) for health care in a managed care setting.
  - Abuse can be committed by the health plan, subcontractor, provider, state employee, or a member, among others. Abuse also includes member practices that result in unnecessary cost to the Medicaid/Medicare Programs, the health plan, a subcontractor, or provider.
- **False Claims Act:**  
The False Claims Act (FCA) provides that any person who knowingly presents or causes to be presented a false or fraudulent claim for payment or approvals (among other activities) is liable to the United States Government for a civil penalty of \$5,000 to \$10,000 plus three times the amount of damages the Government sustains because of the act of that person (as adjusted by the Federal Civil Penalties Inflation Adjustment Act of 1990). The FCA includes a qui tam provision, where individuals can bring claims on behalf of the Government in exchange for a percentage of any recovery.
- **Compliance Program:**  
To ensure compliance with FWA requirements of Medicaid contracts and Medicare Manuals, the Plan and providers will have:
  - Written policies, procedures, and standards of conduct readily available for all

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- employees which outlines our commitment to an FWA program,
- Effective training and education related to FWA for all employees, first tier and downstream entities, or subcontractors,
- Mechanisms to report compliance issues or FWA,
- Enforcement standards through publicized disciplinary guidelines,
- Provisions for internal monitoring and auditing, and
- Provisions to promptly take action to detected offenses and develop corrective action initiatives.
- Financial Investigations and Provider Review (FIPR):  
A multi-faceted unit within the Plan that is involved in detecting and investigating FWA. In addition, the team works to ensure that claims are paid correctly by both pre-pay and post-pay auditing methods and in accordance with recipient benefits and provider contracts.

As a participating practitioner with us, the contract that is signed requires compliance with our policies and procedures for the detection and prevention of FWA. Such compliance may include, but not limited to:

- referral of information regarding suspected or confirmed FWA to us;
- submission of statistical and narrative reports regarding FWA activities;
- submission of medical record requests for pre-payment and post-payment review;
- participation in interviews and audits; and
- completion of provider compliance assessment.

Providers can find FWA trainings created by the Plan's FIPR Team on our website at <https://providers.highmark.com/wholecare/provider-resources/education-webinars>. All providers are required to have a representative review the Provider FWA Training upon contracting with us and annually thereafter. The provider representative will be responsible for communicating the information obtained from the Provider FWA Training to the entire staff of the provider. It is the provider's responsibility to either attend the annual Provider FWA Training or independently review the required materials. Providers will be expected to submit proof of their completion of the training when requested by the Plan. Further information and updates concerning the Provider FWA Training can be found on the Highmark Wholecare website.

Our policies and procedures follow the guidelines set forth by CMS, where applicable. For further information on Fraud, Waste and Abuse, Providers should refer to the CMS website [Reporting Fraud | CMS](#).

It is our policy to discharge any employee, terminate any practitioner or recommend any member be withdrawn from the Medicare Program who, upon investigation, has been identified as being involved in FWA activities.

If FWA is suspected, whether it is by a member, employee or practitioner, it is your responsibility to immediately notify us by calling the Fraud, Waste and Abuse Hotline at 1-844-718-6400.

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Some common examples of provider fraud, waste and abuse are:

- Billing for services not rendered
- Billing for services that the clinician or facility is not appropriately licensed
- Billing for supplies not being purchased or used
- Billing separately for services in lieu of an available combination code
- Billing more than once for the same service
- Up-coding
- Dispensing generic drugs and billing for brand name drugs
- Falsifying records
- Performing inappropriate or unnecessary services

Some common examples of member fraud, waste and abuse are:

- Loaning or using another person's ID
- Changing or forging an order or prescription
- Stealing provider's prescription pads
- "Doctor shopping" for prescriptions

### **Fraud, Waste and Abuse Recovery Requirements:**

Our Company has FWA functions that are responsible for ensuring claims payment accuracy and to detect and prevent FWA which include:

- Pre-payment claims edits and medical record reviews
- Retrospective claims edits and medical record reviews
- Provider education
- FWA investigations and audits
- Provider compliance assessments
- Provider overpayment determinations and extrapolations

Our FWA functions rely on reimbursement policies, medical record standards, and coding requirements that are outlined in the following: Centers for Medicare and Medicaid Services (CMS), American Medical Association (AMA), National Correct Coding Initiative (NCCI), National Committee for Quality Assurance (NCQA), and state Medicaid regulations & bulletins. Additionally, all claims should be coded and documented in accordance with the HIPAA Transactions and Code Sets which includes ICD-10-CM, National Drug Codes (NDC), Code on Dental Procedures and Nomenclature, HCPCS Codes, CPT Code, and Other HIPAA code sets.

Our Company will conduct pre-payment and retrospective reviews of claims and medical records to ensure claims accuracy and record standards. We will recover claims payments that are contrary to national and industry standards. We will conduct progressive reviews, such that, providers may be requested to submit additional samples or documentation during the reviews.

If any of the FWA recovery efforts identify overpayments, the following activities will occur:

- We will comply with all federal and state guidelines to identify overpayments,
- We may determine provider recoveries based on audit results and extrapolation

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methodologies,

- We will pursue recoveries of overpayment through claims adjustments with recoveries by claims offsets or provider checks within 60 days,
- We will refer suspected FWA to appropriate agencies, such as Medicaid oversight and CMS Medics; and
- We may recommend corrective actions that may include pre-payment review, payment suspension, and potential termination from the Plan's provider network.

We may deny payment or pursue overpayments for the following reasons (but is not limited to):

NCCI Procedure to Procedure (PTP) edits
NCCI Medically Unlikely (MUE) edits
NCCI Add-On Code edits
Retrospective coordination of benefits
Retrospective termed member eligibility
Retrospective rate adjustments
Incorrect fee schedule applied to claim
Provider excluded
Provider license terminated or expired
Provider does not meet the requirements to render services
Different rendering provider
No authorization or invalid authorization
Inaccurate claim information
Duplicate claims
Non-covered service
Outpatient services while member was inpatient
Overlapping services
Patient different than member
Per diem services billed as separate or duplicate charges
Services provided outside of practice standards
Group size exceeds limitations
No services provided including no-shows and cancellations
Missing records
Missing physician orders
Missing medication records
Missing laboratory results
Invalid code or modifier
Invalid code combinations
Diagnosis codes that do not support the diagnosis or procedure
Add-on codes reported without a primary procedure code
Clinical documentation issues
Claims documentation issues
Insufficient documentation
Potential fraudulent activities

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Excessive services
Altered/forged records
Inpatient readmissions (up to 30 days)

### **Fraud, Waste and Abuse Audits**

At times, FIPR will conduct audits regarding FWA. If selected for an audit, the provider will receive a letter from the primary investigator, or delegates that have been contracted by the Plan, requesting medical records or the identification of an overpayment. The letter will include specific instructions on how to respond. Overpayment letters issued through administrative reviews will be sent at the discretion of FIPR management.

Additionally, we partner with multiple vendors to conduct various pre-payment and post-payment audits or reviews. Such audits or reviews could include:

- Retrospective data mining reviews.
- Subrogation.
- Inpatient and outpatient chart reviews.
- Pre-payment clinical validation and claims pattern reviews.

Vendor specific questions should be directed to the Plan's Provider Services by calling 1-800-685-5209.

### **Overpayments**

The Plan, its providers, and its members are responsible for the identification and return, regardless of fault, of overpayments. In the event that we make an overpayment to a provider, we must recover the full amount of that overpayment. Additionally, if a provider identifies an overpayment from us, the provider is responsible for returning the overpayment in full at the time of discovery.

### **Provider Self-Audit (Self-Identified Overpayment)**

Federal and State regulations require providers to routinely audit claims for overpayments. We have a process in place for our network providers to report the receipt of a self-identified overpayment.

Providers must notify us in writing of the reason for the self-identified overpayment and should provide payment within sixty (60) calendar days in accordance with 42 U.S.C. §1320a7k(d). If the claim is over two (2) years old a check is preferred. If the claim(s) are less than 2 years old, retraction is preferred. For claims retractions, providers can submit the Provider Self-Audit form that is located on the provider portal. It is imperative that Providers include the explanation of the Self-Audit and the claims they represent. If a listing of claims is not provided, we cannot guarantee that the claims will not be included in separate audits, for the same reason.

Please provide a listing of claims as requested on the Provider Self-Audit/Overpayment Form which is located on our website at

<https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/Forms/SelfAuditOverpaymentsForm.pdf>.

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Conversely, if providers use an extrapolation calculation to determine payment, a description of that methodology and the calculation should be included with your submission.

Deposit of a Provider check, or retraction of the requested claims does not constitute complete agreement to the submitted self-audit results or overpayment amount. FIPR may contact the provider to discuss self-audit results as necessary.

The overpayment letter and check (if applicable) should be sent directly to Highmark Wholecare.

For the mailing address, please refer to **Overpayments** under the “Important Addresses” section on page 14.

Additionally, for more information on self-audits, see the “Self-Audit” e-bulletin posted by CMS at <https://www.cms.gov/Medicare-Medicaid-Coordination/Fraud-Prevention/Medicaid-Integrity-Education/Downloads/ebulletins-self-audit.pdf>

When submitting information for an identified overpayment, please include the following:

- Provider Information (i.e., Name, NPI, TIN, Contact information, etc.)
- Self-Audit / Overpayment Information
- Period of claims
  - For claims more than 2 years old, please provide a check
  - For claims less than 2 years old, retraction of claims is preferred
- List of affected claims and/or extrapolation calculation used to determine overpayment amount
- Other information (as required)

### **TRENDSsubmit: Provider Self-Reporting Process**

Providers can electronically submit overpayments via TRENDSsubmit. This secure, online process allows providers to be notified of claim retractions in real-time and eliminates the manual paper process. The TRENDSsubmit team provides user training resources and ongoing support. Providers can contact Jennifer Baron via email at [jbaron@trendhealthpartners.com](mailto:jbaron@trendhealthpartners.com) in order to initiate TRENDSsubmit access.

### **Medical Record Requests and Standards**

We may request copies of medical records from the provider in connection with claims overpayment or for cases involving alleged FWA. If we request medical records, the provider must provide copies of those records at no cost to the Plan.

This includes notifying any third party who may maintain medical records of this stipulation. In addition, the provider must provide access to any medical, financial or administrative records related to the services provided to our members within thirty (30) calendar days of our request or sooner. All required documentation must be submitted at the time of the original medical record request. Additional documentation will not be accepted after the review is complete.

We require providers to have medical records that comply with CMS, AMA, NCCI, NCQA, HIPAA Transactions and Code Sets, Medicaid regulations, and Medicare manuals as well as

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other applicable professional associations and advisory agencies Providers should follow the below guidelines for basic medical records:

- Providers are responsible for following all requirements under Federal and State regulations, publications, and bulletins that are pertinent to the treatment and services provided.
- Providers should follow the medical record standards as defined in Medicaid contracts, Medicare manuals, provider contracts, provider manuals, and all regulations.
- Providers are responsible for having compliance programs that prevent and detect FWA and report and return overpayments within sixty (60) days of identification.
- Providers must have member records that include all Medicaid and/or Medicare requirements, are individual and kept secure.
- Providers are responsible for obtaining the appropriate order, referral, or recommendation for service.
- All documentation must meet the requirements of the service codes that are submitted on the claims form.
- All progress notes and billing forms must be completed after the session.
- All documentation and medical record requirements must be legible.
- All amendments or changes to the documentation must be signed and dated by the clinician amending or changing the documentation.
- All requirements for documentation must be completed prior to the claim form submission date.
- Each medical record should be individualized and unique and should include a patient identifier on every page. (No clone or copying and pasting of medical records)

**Consent to Treatment**

Valid for dates of service  
Identifies the patient  
Signed and dated by patient  
Signed, dated, and credentialed by clinician  
Lists the types of services and/or treatments  
Includes the benefits and any potential risks  
Includes alternative services and/or treatments  
Must be easy to read and legible

**Release of Information for Payment**

Valid for dates of service  
Identifies the patient  
Signed and dated by patient  
Signed, dated, and credentialed by author/clinician  
Lists the types of services and/or treatments  
Must be easy to read and legible

**Privacy Practices**

Valid for dates of service  
Identifies the patient  
Signed and dated by patient  
Signed, dated, and credentialed by author/clinician  
Must be easy to read and legible

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<b>Medical Information</b>	Must contain the minimum personal biographical data: DOB, Gender, Address, Home Telephone Number, Employer, Occupation, Work Telephone, Marital Status, Name of Next of Kin, Next of Kin Telephone Number Allergies and adverse reactions Significant illnesses and medical conditions Medical history, such as family history, psychosocial history, medical surgical history, baseline physicals, and periodic updates High risk behaviors (Tobacco/cigarette, alcohol, substance misuse, HIV/STD, nutrition, social and emotional risks, etc.) Laboratory and other studies ordered Continuity of care is documented Immunizations and dates Must be easy to read and legible
<b>Treatment Plan</b>	Valid for dates of service Identifies the patient Signed and dated by clinician (witness or author's identification) Documents that member or guardian reviewed or participated in the development of the treatment plan Addresses the chief complaint and clinical finding with a plan of care consistent with standards of care and clinical practice Identifies the diagnosis Identifies interventions and goals of treatment Documents necessity for treatment Reviews are completed timely as applicable Must be easy to read and legible
<b>Progress/ Clinical Entry Note</b>	Dates of Service Identifies the patient Signed, dated, and credentialed by author/clinician Start and stop times for time-based services Units of service Place of service Note is missing narrative/description of services Note does not identify the treatment goals and objectives Note does not list symptoms and behaviors Note does not identify follow-up or next steps in treatment Corresponding encounter or timesheets as applicable Must be easy to read and legible
<b>Medication List</b>	Medication prescribed Signed and dated by clinician Lists dosages, dates, and refills References the side effect and symptoms Must be easy to read and legible

### **Environmental Assessment Standards**

We have established specific guidelines for conducting Environmental Assessment Site Visits, including medical record-keeping standards for all practitioner types, including primary care practitioners, specialty care practitioners, and dental providers. An Environmental Assessment will be conducted on an ongoing basis through monitoring of complaints. Our subcontracted vendor conducts all site visits for contracted dental providers. The purpose of the site visit is to assure that practitioners are in compliance with our Environmental Assessment Standards.

When an environmental assessment is required, a Provider Account Liaison will schedule an on-site or virtual site visit with the office site to conduct an Environmental Assessment. The Environmental Assessment must be conducted with the Office Manager or with a practitioner of the practice. The Provider Account Liaison will complete the Environmental Assessment Form and physically or virtually tour the office as well as interview staff and examine the appointment schedule. The Provider Account Liaison will assess the office for evidence of compliance with the Environmental Assessment Standards.

Upon completion of the review, the Provider Account Liaison will conduct an exit interview with the Office Manager and/or practitioner. The results of the Environmental Assessment will be reviewed. Non-compliance issues must be addressed with a corrective action plan within thirty (30) days of receipt for non-compliant standards.

The Provider Account Liaison will conduct a follow-up visit within ninety (90) days or until the office site is compliant. If any of the standards are not met, the Medical Director will assess the potential impact of the discrepancy to patient care and evaluate the corrective action plan. If the plan is not acceptable, the Medical Director may suggest a different corrective action plan. If the office is not agreeable to correcting the identified problem, the information will be presented to the Quality Improvement/Utilization Management Committee for review. Special circumstances may be granted based upon size, geographic location of the practice, and potential harm to members. The Provider Account Liaison will communicate the final results to the practitioners.

Provider Account Liaisons conduct site visits that include compliance with the Americans with Disabilities Act and Section 504 of the Rehabilitation Act of 1973 for those practices as determined by the Department of Public Welfare.

The Environmental Assessment Standards are listed on pages 79-81.

**Environmental Assessment Standards**

## **PHYSICAL ACCESSIBILITY AND APPEARANCE**

### **Parking**

- Parking lot should have adequate parking available near the physician office.
- Parking lot should have one handicap accessible space per every 25 parking spaces.
- Accessible parking spaces are clearly marked for people with disabilities.

### **Exterior Path of Travel**

- Persons using a mobility aid (e.g. walker, scooter, or wheelchair) can get from the accessible parking space to the office door.

### **Curb Ramps**

- The curb ramps are at least 36" wide leading to the office.

### **Ramps**

- There are railings present if the ramp is longer than 6 ft.

### **Building Entrance**

- The patient entrance and exit are clearly marked and unobstructed.

### **Elevators**

- There is an elevator present when the office is not located on the first or ground floor.

### **Hallway Doors**

- The hallways entrance/exits are handicapped accessible.

### **Provider Interior Path**

- Pathways through the provider's office are wide enough for a person to maneuver a wheelchair.
- The office, waiting room, restroom, and at least one exam room is wheelchair accessible.

### **Bathroom Facilities**

- Support rail(s) are present in bathroom facilities.

### **Waiting Area**

- The office hours are displayed.
- Patient areas are clearly marked as non-smoking.

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**MEDICAL RECORD KEEPING**

- All providers must maintain current and comprehensive medical records which conform to standard medical practices.
- Patient records must be secure from public access at all times.
- The office must have a written confidentiality policy that applies to all staff.
- Records are documented legibly.
- Office must have an organized filing system to insure prompt retrieval of patient records. (Alphabetically, social security numbers)
- There must be a single chart for each patient. If family records are kept, individual records must be clearly delineated.
- Records must identify the member on each page.
- All medically related patient phone calls documented in the medical record.
- Office recalls missed appointments and makes documentation in the medical record.
- Chart Documentation:
  - Allergy or NKA visible in the same place on every record.
  - Patient medical history in each record. Is there a medical history in each patient record?
  - Treatment/progress notes in each patient record.
  - Problem List in the medical record. (PCPs and PCP Specialists Only)
  - Standard place in the medical record for preventive care/immunizations (PCPs and Specialists only).

\*\*IF PROVIDER RELATIONS HAS QUESTIONS OR CHART DOES NOT MEET THE STANDARD THEN A COPY OF ONE RECORD NEEDS TO BE GIVEN TO QI FOR REVIEW.

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**SCHEDULING/AVAILABILITY/ OFFICE PROTOCOLS**

**SCHEDULING**

***PCPs and PCP/Specialists Only***

1. Wait time for Emergent care appointment; immediately seen or referred to an emergency facility (PCP and Behavioral Health Specialists only).
2. Wait time for Urgent Care; immediately seen or scheduled within twenty-four (24) hours (PCP and Behavioral Health Specialists only).
3. Wait time to schedule a routine appointment must be within thirty (30) business days (PCP and Behavioral Health Specialists only).
4. Wait time for non-Urgent, but in need of medical attention (Sick Visit) within seven (7) business days (PCP and Behavioral Health Specialists only).
5. Wait time in the waiting room and exam room should be no more than thirty (30) minutes or at any time no more than up to one (1) hour when the practitioner encounters an unanticipated urgent medical condition visit or is treating a patient with a difficult need.
6. Practice must have at least 20 hours of patient scheduling time per week per office.
7. Practice must have physician coverage arrangements for vacations, etc.

**OFFICE PROTOCOLS**

1. The office must have a recall system for patients who miss appointments and document in Medical Record, whether a postcard, or a telephone call was made/sent.  
At least one attempt to contact the member must be made by telephone. At least three attempts must be made.
2. **PCP and PCP/Specialist Only** – The Office is able to perform EPSDT screens. (Offices whose panel limit is 21 and under) Should the PCP be unable to conduct the necessary EPSDT Screens, the PCP is responsible and willing to arrange to have the necessary EPSDT Screens conducted by another network practitioner and ensure that all relevant medical information, including the results of the EPSDT Screens, are incorporated into the Member's PCP medical record.

**EMERGENCY CARE**

1. **PCP and PCP/ Specialist**--A Physician must be available 24 hours a day, 7 days per week directly or through on-call arrangements for urgent or emergency care and provide triage and appropriate treatment or referrals for treatment. This can be accomplished by answering machine or answering service.

**EXIT INTERVIEW WITH OFFICE**

- Review the Environmental Assessment Standards and your findings at this time.  
Provide the standards for the medical record review process and give approximate date for completion of the credentialing process.

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### **Provider Changes**

To ensure our members have up-to-date and accurate information about Highmark Wholecare's network providers while accessing our provider directory, it is imperative that providers notify us of any of the following:

- Address Changes
- Phone & Fax number changes
- Changes of hours of operation
- Primary Care Practice (PCP) panel status changes (Open, Closed & Existing Only)
- Practitioner participation status (additions & terminations)
- Mergers and acquisitions

The physician agreement indicates that participating providers must submit written notice ninety (90) calendar days prior to the date the provider intends to terminate. There is also sixty (60) days' notice required if you plan to close your practice to new patients and thirty (30) days' notice required for a practice location change. Please refer to the Practice/Provider Change Request Form which is located on our provider website at <https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/Forms/Practice%20Change%20Request%20Form.pdf>.

### **FQHC/RHC Provider Changes Process**

The Highmark Wholecare physician agreement indicates that participating providers must submit written notice ninety (90) calendar days prior to the date the provider intends to terminate. There is also sixty (60) days' notice required if you plan to close your practice to new patients and thirty (30) days' notice required for a practice location change.

Whenever an FQHC/RHC has New Adds (physician or group), Demographic changes and/or Terminations that occur within an FQHC/RHC practice location(s), the FQHC/ RHC Provider Change Form must be completed and sent to the plan within the timeframes indicated above.

Please refer to the FQHC/RHC Provider Change Form which is located on our website at: <https://providers.highmark.com/wholecare/provider-resources/fqhc-rhc-resources>.

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**CMS Guidance on Medicare Marketing Activities**

Below is the CMS guidance on provider marketing activities as detailed at 42 CFR § 422.2266.

Activities with health care providers or in the health care setting.

(a) **Where marketing is prohibited.** The requirements in [paragraphs \(c\)](#) through [\(e\)](#) of this section apply to activities in the health care setting. Marketing activities and materials are not permitted in areas where care is being administered, including but not limited to the following:

- (1) Exam rooms.
- (2) Hospital patient rooms.
- (3) Treatment areas where patients interact with a provider and clinical team (including such areas in dialysis treatment facilities).
- (4) Pharmacy counter areas.

(b) **Where marketing is permitted.** Marketing activities and materials are permitted in common areas within the health care setting, including the following:

- (1) Common entryways.
- (2) Vestibules.
- (3) Waiting rooms.
- (4) Hospital or nursing home cafeterias.
- (5) Community, recreational, or conference rooms.

(c) **Provider-initiated activities.** Provider-initiated activities are activities conducted by a provider at the request of the patient, or as a matter of a course of treatment, and occur when meeting with the patient as part of the professional relationship between the provider and patient. Provider-initiated activities do not include activities conducted at the request of the MA organization or pursuant to the network participation agreement between the MA organization and the provider. Provider-initiated activities that meet the definition in this [paragraph \(c\)](#) fall outside of the definition of marketing in [§ 422.2260](#). Permissible provider-initiated activities include:

- (1) Distributing unaltered, printed materials created by CMS, such as reports from Medicare Plan Finder, the “Medicare & You” handbook, or “Medicare Options Compare” (from the [Medicare website](#)), including in areas where care is delivered.
- (2) Providing the names of MA organizations with which they contract or participate or both.

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- (3) Answering questions or discussing the merits of a MA plan or plans, including cost sharing and benefit information, including in areas where care is delivered.
- (4) Referring patients to other sources of information, such as State Health Insurance Assistance Program (SHIP) representatives, plan marketing representatives, State Medicaid Office, local Social Security Offices, the [Medicare website](#), or 1-800-MEDICARE.
- (5) Referring patients to MA plan marketing materials available in common areas.
- (6) Providing information and assistance in applying for the LIS.
- (7) Announcing new or continuing affiliations with MA organizations, once a contractual agreement is signed. Announcements may be made through any means of distribution.

(d) **Plan-initiated provider activities.** Plan-initiated provider activities are those activities conducted by a provider at the request of an MA organization. During a plan-initiated provider activity, the provider is acting on behalf of the MA organization. For the purpose of plan-initiated activities, the MA organization is responsible for compliance with all applicable regulatory requirements.

- (1) During plan-initiated provider activities, MA organizations must ensure that the provider does not:
  - (i) Accept or collect Scope of Appointment forms.
  - (ii) Accept Medicare enrollment applications.
  - (iii) Make phone calls or direct, urge, or attempt to persuade their patients to enroll in a specific plan based on financial or any other interests of the provider.
  - (iv) Mail marketing materials on behalf of the MA organization.
  - (v) Offer inducements to persuade patients to enroll in a particular MA plan or organization.
  - (vi) Conduct health screenings as a marketing activity.
  - (vii) Distribute marketing materials or enrollment forms in areas where care is being delivered.
  - (viii) Offer anything of value to induce enrollees to select the provider.
  - (ix) Accept compensation from the MA organization for any marketing or enrollment activities performed on behalf of the MA organization.
- (2) During plan-initiated provider activities, the provider may do any of the following:

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- (i) Make available, distribute, and display communications materials, including in areas where care is being delivered.
- (ii) Provide or make available marketing materials and enrollment forms in common areas.

(e) **MA organization activities in the health care setting.** MA organization activities in the health care setting are those activities, including marketing activities that are conducted by MA organization staff or on behalf of the MA organization, or by any downstream entity, but not by a provider. All marketing must comply with the requirements in paragraphs (a) and (b) of this section. However, during MA organization activities, the following is permitted:

- (1) Accepting and collect Scope of Appointment forms.
- (2) Accepting enrollment forms.
- (3) Making available, distributing, and displaying communications materials, including in areas where care is being delivered.

### **Provider Complaints**

We have created a Provider Complaint system for participating and non-participating providers to raise issues with Highmark Wholecare Medicare Assured policies, procedures and administrative functions. Complaints will be investigated, and the details of the findings and disposition will be communicated back in writing to the provider within thirty (30) days of receipt. If additional time is needed to resolve Highmark Wholecare Medicare Assured will provide status updates to the provider as applicable.

Any misdirected submissions, including but not limited to Administrative Reviews or Clinical Appeals, into the Provider complaint system will be routed to the appropriate department. The provider will be advised of the redirection and educated on proper handling and contact details of the appropriate department for future reference.

All network providers are required to be NaviNet enabled. Providers are expected to use this tool to access the Provider Complaint Messaging Center. All non-participating providers will be directed to complete the Highmark Wholecare Medicare Assured Non Participating Provider Complaint Form which is located on the Highmark Wholecare website at <https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/Forms/NonParComplaintForm.pdf>.

The form may be submitted to [ProviderComplaints@HighmarkWholecare.com](mailto:ProviderComplaints@HighmarkWholecare.com) or faxed to 1-844-221-1569.

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**Continuity and Coordination of Care**

Specialists, Hospitals & Skilled Nursing facilities must ensure compliance with the Continuity and Coordination of Care requirements, by ensuring that all discharge summaries and progress reports are reported back to the member's PCP. Continuity and Coordination of Care across settings is a regulatory requirement.

Care across settings, such as between Primary Care Physicians (PCPs) and Specialists, presents many challenges to the continuity of information, relationships and treatment.

Much of the Plan's membership is made up of the most vulnerable individuals. Some of whom suffer from severe or chronic illnesses. Enhanced communication is imperative across all the touchpoints within these patients' care in order to make informed decisions which will ensure their well-being. Failure to share information about the care of a patient can result in suboptimal outcomes, increased costs, and medical errors.

It is to the benefit of both the patient and healthcare professional to communicate any reports, therapies, medications, and concerns identified by providers across treatment settings. For additional continuity of care concerns or assistance, please contact your Provider Account Liaison.

## **REFERRALS AND AUTHORIZATIONS**

### **Referrals**

#### **Out of Plan Referrals**

Occasionally, a member may need to see a healthcare professional outside of Highmark Wholecare's provider network. When the need for out-of-plan services arises, the primary care practitioner must contact our Utilization Management Department to obtain an authorization via our GuidingCare authorization portal, accessed via NaviNet. If for some reason GuidingCare is unavailable, providers can contact our Utilization Management Department at 1-800-685-5209. The Utilization Management Department will review the requests and make arrangements for the member to receive the necessary medical services with a specialty care practitioner in collaboration with the recommendations of the primary care practitioner. Every effort will be made to locate a healthcare professional within an accessible distance to the member.

#### **Referrals for Second Opinions**

Second opinions from a qualified health care professional may be requested by a member. When requesting a second opinion consultation, Highmark Wholecare recommends that you issue a referral to an in-network qualified health care professional that is not in practice with the practitioner who rendered the first opinion. If an in-network, qualified health care professional is not available, contact our Utilization Management Department to assist in arranging and obtaining an authorization for the second opinion of an out-of-network provider at no additional cost to the member than an in-network referral.

#### **Self-Referral**

All Highmark Wholecare members are encouraged to coordinate care with their primary care practitioner prior to receiving specialty services except for the services that can be accessed by self-referral. Members may refer themselves for the following types of care:

- Routine Women's Health Care
- Pap Smears
- Pelvic Exams
- Mammograms
- Flu Shots
- Pneumonia Vaccinations
- Specialists Visits
- Prostate Screening
- Colorectal Screening
- Bone Mass Measurements
- Diabetes Monitoring Training
- Dialysis
- Behavioral Health Services
- Substance Use Services
- Vision Exams\*
- Hearing Exams\*

\*Benefit coverage varies by product.

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### **Authorizations**

The function of an authorization is to confirm the eligibility of the member, verify coverage of services, assess the medical necessity and appropriateness of care, establish the appropriate site for care, and identify those members who may benefit from case management or disease management. Authorization is the responsibility of the admitting practitioner or ordering provider and can be obtained by contacting Highmark Wholecare's Medicare Assured Utilization Management Department prior to services being rendered via our GuidingCare authorization portal, accessed via NaviNet. If for some reason GuidingCare is unavailable, providers can contact our Utilization Management Department at 1-800-685-5209. (Refer to the section listed as the Process for Requesting Prior Authorization.) The Utilization Management Department assesses the medical appropriateness of services using nationally recognized criteria, such as McKesson's InterQual® Criteria, the American Society of Addiction Medicine (ASAM) Guidelines, the Centers for Medicare and Medicaid Services (CMS)-definition of medical necessity, CMS National and Local Coverage Determinations, and our company's medical policies when authorizing the delivery of healthcare services to plan members.

The CMS definition of medically necessary specifically states that a service must be medically necessary to be covered, which means that it must be reasonable and necessary for the purpose of diagnosing or treating illness or injury to improve the functioning of a malformed body member. It refers to services or supplies that: are proper and needed for the diagnosis or treatment of the member's medical condition; are used for the diagnosis, direct care, and treatment of the member's medical condition; meet the standards of good medical practice in the local community; and are not mainly for the convenience of the member or the doctor.

The following services require prior authorization from Highmark Wholecare or have a payment policy applied:

- Acute Inpatient Admission and Continued Stays
- Skilled Nursing Facility (SNF), Long-Term Acute Care Hospital (LTACH), and Inpatient Rehabilitation Facility (IRF) Stays
- Notification of Discharge (Acute IP Discharge)
- Behavior Health Admission/Continued Stay Review Psych
- Behavior Health Substance Use/Misuse Admission/Continued Stay Review
- Behavior Health Discharge
- Behavior Health Outpatient Requests
- Chiropractic Visits
- Durable Medical Equipment (DME) Requests
- Obstetrical Needs Assessment Form (ONAF)

**Note:** A comprehensive list of items requiring authorization can be found on our website under the provider section. Remember to check for medical or payment policies that may apply.

- Medical Policies: <https://providers.highmark.com/wholecare/resource-centers/medicare-resources/policy-search>
- Payment Policies: <https://providers.highmark.com/wholecare/provider-resources/payment-policies>

**Note:** Failure to follow the prior authorization process may result in the administrative denial of your claim regardless of medical necessity. It is the responsibility of the provider to submit a

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request for a retrospective authorization when outside of their control, an authorization was not obtained. In the event services are needed urgently or emergently, authorizations must be requested within 4 calendar days of discharge for inpatient services and within 1 business day for outpatient services. Authorization requests made outside of this timeframe must be submitted through retrospective review.

Along with the authorization the provider must submit justification as to why an authorization was not requested such as whether the member was incapacitated, whether the member provided the wrong insurance information at the time of service, or whether the procedure meets the definition of requiring emergency stabilization along with all relevant medical records to Highmark Wholecare.

For the mailing address, please refer to **Retrospective Authorization Reviews** under the “Important Addresses” section on page 15 or fax to 1-855-501-3904.

**Note:** Highmark Wholecare Providers can initiate authorization requests online by accessing the Authorization Portal through NaviNet Single Sign-On (SSO) functionality. From the Health Plans dropdown on the NaviNet Plan Central page, select Highmark Wholecare then GuidingCare>Authorization Portal from the Plan Workflows menu. For additional information regarding GuidingCare, please refer to the GuidingCare user Guide on our website.

### **Process for Requesting Prior Authorizations**

The Utilization Management Department is committed to assuring prompt, efficient delivery of healthcare services and to monitor quality of care provided to Highmark Wholecare members. The Utilization Management Department can be contacted via our GuidingCare authorization portal, accessed via NaviNet. If for some reason GuidingCare is unavailable, providers can contact our Utilization Management Department between the hours of 8:00 am and 5:00 pm, Monday through Friday, at 1-800-685-5209.

When calling before or after operating hours or on holidays, practitioners are asked to leave a voicemail message, and a Utilization Management Representative will return the call the next business day. Urgent requests or questions are directed to call 1-800-685- 5209.

If faxing information, speak with a Utilization Management Representative first and when requested, fax the information to the Utilization Management Representative's attention. The Representative will inform you of the name and fax number.

Highmark Wholecare providers can submit authorization requests online by accessing the GuidingCare Authorization Portal through NaviNet Single Sign-On (SSO) functionality for all UM related requests, including but not limited to, the following services:

- Inpatient Maternity
- Inpatient Services
- Durable Medical Equipment
- Select Surgical Procedures
- Diagnostic Testing
- Genetic Testing

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In the case of an emergent admission when care cannot be coordinated on a pre-service basis, the Highmark Wholecare admitting physician, hospital, or member is encouraged to notify the Utilization Management Department as soon as possible of the inpatient admission. Notification facilitates coordination of care management, quality issues and discharge planning. Highmark Wholecare will perform concurrent inpatient level of care reviews to establish medical necessity. In the event services are needed urgently or emergently, authorizations must be requested within (4) calendar days of discharge. Admission requests made outside of this timeframe must be submitted through retrospective review.

Authorization requests made after the care has been completed (post service/post discharge) must be submitted as an appeal once a claim denial has been received. Utilization Management will not accept post service authorization requests.

When requesting authorization of planned procedures, we recommend contacting the Utilization Management Department as soon as possible, but within a minimum of two (2) working days in advance when possible. Authorization requests should be submitted through our GuidingCare authorization portal, accessed via NaviNet. If for some reason GuidingCare is unavailable, providers can contact our Utilization Management Department.

Once a request is received, the information given will be reviewed, and the member's eligibility verified. However, since a member's eligibility may change prior to the anticipated date of service, eligibility must be verified on the date of service.

The following information may be needed to authorize a service:

- Member Name and Birthdate
- Member ID Number
- Procedure Code, if applicable (CPT4, HCPCS)
- Durable Medical Equipment (DME) Codes and Cost of Item(s), when applicable
- Date of Service
- Name of Admitting/Treating Practitioner
- Name of the Practitioner requesting the Service
- NPI number
- Any other pertinent clinical information such as:
  - Diagnoses/Co-morbidities
  - Age
  - Complications
  - Progress of treatment
  - Medical history
  - Previous test results
  - Current medications
  - Psychosocial situation
  - Home environment/social situation, when applicable.

When Utilization Management (UM) has authorized services provided by a Skilled Nursing Facility (SNF) or Home Health Agency (HHA) and it has been determined that coverage for the

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services will end, the Utilization Management staff will coordinate with the SNF or HHA through a process agreed upon by the facility/agency and the UM team to deliver the appropriate notification (Notice of Medicare Non-Coverage) to the member. The notification will inform the member of the discontinuation of the service and will be provided to the member within the timeframes established by CMS.

**Note:** Failure to follow the prior authorization process may result in the administrative denial of your claim regardless of medical necessity. It is the responsibility of the provider to submit a request for a retrospective authorization when outside of their control, an authorization was not obtained.

Along with the authorization the provider must submit justification as to why an authorization was not requested such as the member was incapacitated, the member provided the wrong insurance information at the time of service, or the procedure meets the definition of requiring emergency stabilization along with all relevant medical records. The information must be sent directly to Highmark Wholecare.

For the mailing address, please refer to **Retrospective Authorization Reviews** under the "Important Addresses" section on page 15 or fax to 1-855-501-3904.

### **Outpatient Therapy Services**

All Outpatient Therapy treatment services including physical therapy, occupational therapy, and speech therapy require prior authorization. Outpatient therapy services require prior authorization through the HealthHelp website at [www.healthhelp.com/highmarkwholecare](http://www.healthhelp.com/highmarkwholecare) or by calling the dedicated toll-free phone number, Monday through Friday 8:00 AM to 6:00 PM at 1-800-546-7092. A separate authorization number is required for each procedure ordered. The therapy provider will be asked to fax the current progress notes, plan of treatment, and goals, which support the medical necessity of the therapy services.

In keeping with our commitment of promoting continuous quality improvement for services provided to our members, we entered into an agreement with HealthHelp to implement a Musculoskeletal (MSK) Management Program. This program includes prior authorization for non-emergent MSK procedures including outpatient, interventional spine pain management services (IPM), inpatient and outpatient hip, knee, shoulder, lumbar, and cervical spine surgeries; you would call the HealthHelp dedicated toll-free phone number, Monday through Friday 8:00 AM to 6:00 PM at 1-800-546-7092.

### **Durable Medical Equipment**

For DME, medical supplies and orthotics and prosthetics the following information is needed when requesting authorization:

- Name of requested equipment or medical supply, appropriate code (HCPCS), cost
- Rental vs. purchase request
- Amount of items requested
- Clinical Information to support the medically necessary service request

## **Services Requiring Authorization**

Prior authorization by Utilization Management is required for the following services:

- Elective Inpatient Admissions, including behavioral health and substance misuse, inpatient rehabilitation, skilled nursing facility, and long-term acute care hospital admissions
- Genetic Testing
- Hyperbaric Oxygen Therapy
- Non-Invasive Positive Pressure Ventilation
- Readmissions within 30 Days
- Durable Medical Equipment (DME), Orthotics, Prosthetics, Medical Supplies or monthly rentals
- Cardiology Procedures including Peripheral Revascularization, Cardiac Devices, Ablation/EPS (HealthHelp)
- Complex outpatient imaging services (HealthHelp)
- Chiropractic Services (Chiropractic services are covered to correct a subluxation by means of manual manipulation of the spine)
- Outpatient Psychiatric Partial Hospitalization
- Outpatient Rehab (physical therapy, occupational therapy, speech therapy, including therapy performed in the home (HealthHelp)
- Experimental/Investigational Services
- Plastic Surgery/Cosmetic Procedures
- Non-participating provider services (exception: emergency room, dialysis, emergency ambulance transport)
- Outpatient surgical procedures as follows:
  - Bariatric Surgery/Stapling
  - Blepharoplasty
  - Breast Reduction
  - Carpal Tunnel Surgery
  - Genital Reconstruction
  - Hyperbaric Oxygen Therapy
  - Hysterectomy
  - Implants
  - Musculoskeletal Surgeries (HealthHelp)
  - Pain Management Interventions, including spinal procedures (HealthHelp)
  - Panniculectomy
  - Radiation Oncology (via Health Help)
  - Removal of Breast Implant
  - Rhinoplasty
  - Sleep Studies, PAP Therapy, Oral Appliances (Health Help)
  - Spinal Neuro Stimulator Services
  - TMJ Surgery
  - Transplants
  - Tubal Ligations
  - Varicose Vein Surgeries performed at a Short Procedure Unit or Ambulatory Care Center

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**Note:** A comprehensive list of items requiring authorization is located on our website at <https://providers.highmark.com/wholecare>.

In addition, participating providers can access our provider portal, via NaviNet to determine if a code requires prior authorization.

In the case of urgent/emergent admissions, the Highmark Wholecare admitting physician, hospital, or member is encouraged to notify the Utilization Management Department as soon as possible of the inpatient admission. Organ transplants require prior authorization and must be performed at a Medicare- approved transplant center, per CMS requirements. The following types of transplants are covered: corneal, kidney, pancreas, liver, heart, lung, heart-lung, bone marrow, intestinal/multi-visceral, and stem cell.

### **Prior Authorization Decision Timeframes and Notification**

#### **Standard Decisions:**

For standard precertification requests, the Utilization Management Department will make a decision to approve, deny or limit authorization of the service request as expeditiously as the enrollee's health condition requires, but no later than seven (7) calendar days from the receipt of the request. Verbal notification of either decision will be made to the provider on behalf of the enrollee. Notification will be sent to the requesting provider and enrollee in writing on all initial authorization determinations no later than seven (7) calendar days from the receipt of the request.

For standard concurrent requests, the Utilization Management Department will make a decision to approve, deny or limit authorization of the service request as expeditiously as the enrollee's health condition requires, but no later than 72 hours from the receipt of the request. Verbal notification of the decision will be made to the provider on behalf of the enrollee. Notification will be sent to the requesting provider and enrollee in writing on all authorization determinations. Written notification will occur within 72 hours of receiving the request.

As applicable, the Utilization Management Department will instruct the requesting provider on how to contact the Medical Director for a peer review discussion.

#### **Expedited Decisions:**

For expedited requests, the Utilization Management Department will make a decision to approve, deny or limit authorization of the service request as expeditiously as the enrollee's health condition requires, but no later than 72 hours from the receipt of the request. The Utilization Management Department will notify the requesting provider and the enrollee telephonically on all expedited determinations. Written notification to the enrollee and provider will occur within 72 hours from receipt of the request.

### **Home Infusion**

Nursing visits and supplies related to home infusion services do not require authorization. Refer to Pharmacy regarding authorization requirements for infusion drugs.

## **Pharmacy Services**

Highmark Wholecare utilizes a closed formulary. Practitioners are encouraged to prescribe formulary medications when medically appropriate. Some formulary medications may have additional coverage restrictions, such as a quantity limit or step therapy. If changing to a formulary medication is not medically advisable for a member, or if an exception is needed for a formulary medication that has coverage restrictions, a practitioner must initiate a request for drug coverage by one of the following methods: submitting an electronic prior authorization via CoverMyMeds.com, faxing the Request for Drug Coverage Form to 1-888-447-4369, or calling Pharmacy Services at 1-800-685-5209. Practitioners should ensure that all relevant information is available when calling or submitting as failure to provide this may result in an adverse coverage determination.

We encourage practitioners to utilize the Request for Drug Coverage Form located on the Highmark Wholecare website at

[https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/Forms/MC\\_NonformularyRequestForm.pdf](https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/Forms/MC_NonformularyRequestForm.pdf).

These forms may be photocopied, or you can also request a copy by calling Pharmacy Services.

All standard requests for Part B or Part D drugs submitted with the necessary clinical information will be reviewed and a decision made as expeditiously as the enrollee's health condition requires, but no later than 72 hours after receipt of the request by Pharmacy Services; all expedited requests within 24 hours after receipt of the request. In certain cases, the plan will automatically authorize a temporary supply of a non-formulary drug to allow sufficient time to transition the enrollee to a formulary alternative or request an exception.

Enrollees and practitioners are notified in writing and/or telephonically of decisions in accordance with CMS guidance.

## **Managing Care Transitions**

Highmark Wholecare's Utilization Management (UM) and Case Management (CM) Teams make a special effort to coordinate care when members transition from one setting to another, particularly as members are being discharged from a hospital setting to another setting. When care transitions are not coordinated adequately, patients can be at risk of poor-quality care, gaps in needed care and patient safety risks. CM care transition coordination is supported throughout the authorization process, including collaborating with practitioners and providers who deliver patient care. When patients are experiencing a planned or unplanned care transition, the sending setting of care must provide a patient care plan to the receiving setting within one business day of the transition notification. Sharing a comprehensive care plan increases continuity and coordination of care across the settings and helps prevent patient risks.

A patient care plan includes patient-specific information that is relevant to the member's clinical condition and health status. A care plan should contain medical and non-medical information,

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such as a current problem list, allergies/sensitivities, medication regimen, contact information for the patient's care providers, baseline physical and cognitive functioning and advance directives. The patient care plan may be included within documents often called discharge summaries, transfer summaries or patient instructions.

Additionally, changes to the member's health status or patient care plan should be communicated to the member or the member's responsible party within a reasonable timeframe, but no later than one calendar day from the transition.

Some ways that we help to facilitate safe care transitions are identifying unplanned and planned care transitions; establishing a single point of contact for member support throughout the care transition process; and communicating with the member, the member's primary care practitioner and treating providers.

### **New Technology**

Any new technology or new use of existing technology identified during the Utilization Management review process, and requiring authorization for implementation of the new technology will be forwarded to the Medical Director for authorization. If there is a question about the appropriate governmental agency approval of the technology, the Medical Director will investigate the status of the technology with the agency, consult appropriate specialists related to the new technology, professionals (who have expertise in the technology), and other major payers/state agencies and opinions of professional societies and/or utilize the contracted services of Elsevier for information related to the new technology. The technology will also be investigated through CMS National and Local Coverage Determinations. If the technology has not been reviewed by appropriate governmental regulatory bodies, the Medical Director will discuss the need for the specifically requested technology with the primary care practitioner and may consult with a participating specialist from the Highmark Wholecare expert panel regarding the use of the new technology. The new technology review will be presented to the Highmark Wholecare QI/UM Committee. If it is determined that no other approved technology is available and/or the Medical Director and consultants feel that the possibility of a positive outcome would be achieved with the use of the new technology, approval may be given. Highmark Wholecare will consider those specific medical items, services, treatment procedures or technologies not specifically identified as non-covered or non-reimbursable by Medicare as defined within National Coverage Determinations.

## **CLAIMS AND BILLING**

### **Member Billing Policy**

Highmark Wholecare offers two Dual-eligible Special Needs Plans (D-SNP) which is designed for those eligible for BOTH Medicare (PART A and B) and Medicaid (Medical Assistance) or assistance from the State. Individuals who qualify for both are commonly referred to as Duals.

Because our members are enrolled in a Medicare Advantage Plan, there is a limit to how much a member will have to pay out-of-pocket each year for medical services that are covered under Medicare Part A and Part B.

A member's out-of-pocket expense or cost sharing will vary depending upon the level of assistance they may be receiving from the State or Medicare, as well as which Highmark Wholecare Medicare Assured plan they have chosen to join.

Maximum Out of Pocket (MOOP) is a cost sharing limit that once reached triggers a Medicare Advantage plan to pay 100% of the allowed costs for covered Part A and Part B services. MOOP is accumulated as claims for Part A and Part B services are received, and finalized by, a health plan.

Medicare Advantage Plans must calculate MOOP based on the accrual of all cost-sharing in the plan benefit, regardless of whether that cost-sharing is paid by the beneficiary, Medicaid, other secondary insurance, or remains unpaid.

In order to be compliant with the CY 2023 MA Final Rule, we will track MOOP accumulations for Highmark Wholecare Medicare Assured Diamond and Ruby members, as noted above.

As a reminder, our Dual-Eligible Medicare Assured members shall not be held liable for Medicare Parts A and B cost-sharing when the appropriate state Medicaid agency or Community Health Choice Plan (CHC) is liable for the cost-sharing.

Providers further agree that upon payment from Highmark Wholecare Medicare Assured, providers will accept the plan payment as payment in full or bill the appropriate State source. Please make sure to follow Medicaid coverage and claims processing guidelines. Balance billing a dual eligible for deductible, coinsurance, and copayments is prohibited by Federal law.

### **Claims**

#### **General Information**

Procedures for Highmark Wholecare are as follows:

- All claims should be coded and documented in accordance with the HIPAA Transactions and Code Sets which includes International Classification of Diseases (ICD-10-CM), Current Procedural Terminology (CPT) and Healthcare Common Procedure Coding System (HCPCS) with modifiers where appropriate, National Drug Codes (NDC).

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- The Center for Medicare and Medicaid Services (CMS) place of service codes are the only place of service codes accepted for processing claims.
- New codes will be added to the Highmark Wholecare respective fee schedules effective the first of the month upon receipt of notification from CMS. The new fees/rates will be loaded into the Claims system for payment within thirty days (30) from the notification. If a provider would like the new rate considered, it is the provider's responsibility to resubmit a corrected claim with the appropriate coding within the timely allowance. Retroactive payments are not made to the provider.
- Claims are accepted through Electronic Data Interchange (EDI). Facilities and providers are encouraged to submit claims via this format.
- Paper and EDI claims without the required National Provider Identifier (NPI) numbers will be rejected and returned to the provider's EDI clearinghouse or returned via US Postal service to the billing address on the claim form. Paper claims will be handled just like rejected EDI claims and will not be loaded the claims system. Providers will be held to timely filing policies in regard to submission of the initial and corrected claims.
- Handwritten claims are not accepted.
- Correct/current member information, including the 8-digit member ID number, must be entered on all claims. The member ID number or MBI (Medicare Beneficiary Identifier) in alpha and numeric format will be accepted on electronic claims. The member ID number is preferred to assure that the claim is processed under the correct individual.
- Claims can be submitted with or without the Alpha character prefix appearing on the member's ID card.
- The billing provider address submitted on claims (paper and electronic) must be a physical address. Claims submitted will be rejected if a P.O. Box number is submitted as the billing address.
- Please allow four (4) to six (6) weeks for a remittance advice. It is the practitioner's responsibility to research the status of a claim.
- All claims, including corrected claims, must be filed within three hundred sixty-five (365) days from the date of service.
- When Highmark Wholecare is secondary to any commercial plan. Claims must be submitted within timely filing guidelines.
- Inpatient hospital claims must be submitted with an MS-DRG Code.
- Providers of obstetric services are reimbursed on a global basis for deliveries. Individual visits are not reimbursed and should not be billed.
- In the case of a claims overpayment, we will produce a negative remittance advice. The negative remittance advice will capture the overpayment and the impacted claims. Overpayments will be deducted from future claim payments until the Providers account returns to a positive status. Providers also have the capacity to submit a reimbursement to balance the account.

**Timely Filing**

All claims, including corrected claims, must be filed within three hundred sixty-five (365) days from the date of service. We prefer to receive claims electronically, but we do accept claims submitted on paper. If you bill on paper, we will only accept paper claims on a CMS-1500 or a UB-04 Form. No other billing forms will be accepted.

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For more information visit the Medicare Website at:

[https://www.cms.gov/Medicare/Billing/ElectronicBillingEDITrans/16\\_1500](https://www.cms.gov/Medicare/Billing/ElectronicBillingEDITrans/16_1500).

UB-04 and a CMS-1500 Claim Forms can be found on the provider website at <https://providers.highmark.com/wholecare/resource-centers/medicare-resources/medicare-forms-reference-materials>, under General Provider Forms & References.

Any claim that has been submitted to Highmark Wholecare but does not appear on a remittance advice within sixty (60) days following submission should be researched by calling our Provider Services Department at 1-800-685-5209 to inquire whether the claim was received and/or processed.

### **Electronic Claims Submission**

Claims are accepted through Electronic Data Interchange (EDI). Facilities and providers are encouraged to submit claims via this format. The EDI 837 Health Care Claim transaction is the electronic transaction for claims submissions.

Highmark Wholecare accepts claims electronically in data file transmissions through any clearinghouse. Providers are encouraged to take advantage of our electronic claims processing capabilities. Submitting claims electronically offers the following benefits:

- Faster Claims Submission and Processing
- Reduced Paperwork
- Increased Claims Accuracy
- Time and Cost Savings

For submission of professional or institutional electronic claims, please refer to the following grid for Clearinghouse Payer IDs:

<b>CPID</b>	<b>PAYER NAME</b>	<b>PAYER ID</b>	<b>CLAIM TYPE</b>
2298	Highmark Wholecare Medicare Assured	60550 (PA)	Professional
2912	Highmark Wholecare Medicare Assured	60550 (PA)	Institutional

### **Requirements for Submitting Claims to Highmark Wholecare through a Clearinghouse**

When submitting claims please note the Pennsylvania Payer ID Number is 60550. Any claim submitted with the incorrect Payer ID Number will reject.

The billing provider address submitted on claims must be a physical address. Claims will be rejected if a P.O. Box number is submitted as the billing address. In order to prevent claims from being rejected, please be sure to submit a physical address as the billing address.

- The assigned 8-digit member identification number is needed for both paper and electronic claims. For providers who do not know the member's identification number it is acceptable to submit the member's Medicare Beneficiary Identifier (MBI).

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Claims can be submitted with or without the Alpha character prefix appearing on the member's ID card.

The NPI (National Provider Identifier) number is required, and the Member's 8-digit identification number is necessary. When care is coordinated, the referring provider's name and NPI are also required. A claim will be rejected if it does not include required NPI(s) and current procedure and diagnosis codes.

To ensure that claims have been accepted via EDI, providers should receive and review acceptance/rejection reports from their clearinghouse.

If you are not submitting claims electronically, please contact your EDI vendor for information on how you can submit claims electronically. Highmark Wholecare will accept electronic claims for services that would be submitted on a standard CMS-1500 or a UB-04 claims forms. However, services billed by report cannot be submitted as attachments along with electronic claims.

### **HIPAA 5010**

The 5010 version of the HIPAA electronic transactions is required in order to support the transfer of ICD-10 diagnosis code and ICD-10 procedure code data on claims and remittances.

### **Claim Payments (Electronic Remittance Advice/Electronic Funds Transfer)**

Our company uses PNC Healthcare Claim Payments & Remittances (CPR) service, powered by Echo Health. This platform allows our company to make payments based on provider's preferences, maximizing electronic payment options and simplifying adoption.

Providers may register to receive payments electronically. The CPR service enables providers to log into a web-based portal to manage their payment preferences and access their detailed explanation of payment (EOP) for each claim payment.

Outlined below are payment options:

- 1. Virtual Card Payments** – If you are not currently registered to accept payments electronically, you will receive virtual credit card payments with your EOP.
- 2. Electronic Funds Transfer (EFT) Payments** – If you are interested in a more automated method of receiving payments, EFT is a fast and reliable payment method. You can also choose to automate the associated remittance information via an 835 Electronic Remittance Advice (ERA) sent directly to your organization or your clearinghouse.
  - To sign up to receive EFT payments only or 835 and EFT from our company, visit <https://enrollments.echohealthinc.com/afteradirect/highmarkwholecare>
  - To sign up to receive EFT payments only or 835 and EFT from our company and from all Echo payers, visit <https://view.echohealthinc.com/EFTERA/afterainvitation.aspx>
- 3. Medical Payment Exchange (MPX)** –provides the option to direct print an in-office check

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at no cost, receive virtual card payment or enroll for EFT.

**4. Paper Checks** – To receive paper checks and paper EOPs, you must contact CPR Customer Service to elect to opt out of virtual card payments or remove your EFT enrollment.

### **Claims Review Process**

We will review for reconsideration any claim that a provider feels was denied or paid incorrectly. These are requests that are not regarding medical necessity rather are administrative in nature such as, but not limited to, disputes regarding the amount paid, denials regarding lack of modifiers, refunded claim payments due to incorrect payment, or coordination of benefit issues. Administrative claim reviews can be initiated by the provider through a written request, by contacting our Provider Services Department or via fax to 1-844-207-0334. A plan participating provider can also submit a request through the Provider Portal via NaviNet. To help us resolve the dispute, please forward documents that support your position including Claim ID Number, Member ID Number, date of service and clear rationale. Initial claims that are not received within the timely filing limit will not qualify for review. All follow-up review requests must be received within three hundred sixty-five (365) calendar days of the date of service on the claim. Claims inquiries for administrative reviews should be sent directly to Highmark Wholecare.

For the mailing address, please refer to **Administrative Claims Reviews** under the “Important Addresses” section on page 13 or fax to 1-844-207-0334.

We cannot accept verbal requests to retract claim(s) overpayments. Providers may complete and submit a Refund Form or a letter that contains all of the information requested on this form.

The Refund Form is located on the provider website at <https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/Forms/RefundForm.pdf>. The form, together with all supporting materials relevant to the claim(s) reversal request being made including but not limited to an Explanation of Benefits (EOB) from other insurance carriers and your refund check should be mailed to the Finance Operations Refund P.O. Box.

For the mailing address, please refer to **Refund Payments** under the “Important Addresses” section on page 13.

### **Cotiviti Claims Pattern Review (CPR)**

Highmark Wholecare utilizes Cotiviti Claims Pattern Review (CPR) to enhance the accuracy, integrity and timeliness of our claims processing. CPR has enabled efficient Payment Policy Management and allows for the review of claims using “real time” analytics, including the ability to pause claims processing and enabling Cotiviti CPR experts to review claims for proper validation prior to payment.

### **Cotiviti Claims Pattern Review Appeals Process**

Providers have the right to submit for review any claim they feel was denied or paid incorrectly. Providers have three options to send in Cotiviti CPR Appeals:

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1. Direct upload to the [Secure Portal](#). Simply click on the “Submit Records” button and enter your password high90CCVC.
2. Secure faxing to 800-409-0499.
3. Mailing the records directly to Cotiviti. Please mark the envelope “Confidential” and send to:

C/O Cotiviti-6150  
10701 S Riverfront Pkwy,  
Box 12017  
South Jordan, Utah 84095

**Coordination of Benefits**

Coordination of Benefits (COB) is the process of establishing financial responsibility for a claim and coordinating benefit payments between two or more insurance plans. It allows another insurance plan to pay the provider first as a primary payment. Once it has been determined what the first insurer (primary carrier) has paid, it is necessary to determine if there are any benefits remaining to be paid.

Some of our members have other insurance coverage. Highmark Wholecare follows Medicare coordination of benefits rules. We will not deny or delay approval of otherwise covered treatment or services unless the probable existence of third-party liability is identified in our records for the member at the time the claims are submitted.

Please note the following criteria applies and designates when Highmark Wholecare is not the primary plan for Medicare covered members:

- Enrollee is 65+ years and covered by an Employer Group Health Plan (EGHP) because of either current employment or current employment of a spouse of any age and the employer employs 20 or more employees.
- Enrollee is disabled and covered by an Employer Group Health Plan because of either current employment or a family member’s current employment, and the employer that sponsors or contributes to the Large EGHP plan employs 100 or more employees.
- For an enrollee entitled to Medicare solely on the basis of end-stage renal disease and Employer Group Health Plan coverage (including a retirement plan), the first 30 months of eligibility or entitlement to Medicare.
- Workers’ compensation settlement proceeds are available.
- No-fault or liability settlement proceeds are available.

In order to receive payment for services provided to members with other insurance coverage, the practitioner must first bill the member’s primary insurance carrier using the standard procedures required by the carrier. Upon receipt of the primary insurance carrier’s Explanation of Benefits (EOB), the practitioner should submit a claim to Highmark Wholecare. The practitioner must:

- Follow all authorization and billing procedures.
- File all claims within timely filing limits as required by the primary insurance carrier.
- Submit a copy of the primary carrier’s EOB with the claim to our company within 365 days of the date of the service.

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- The amount billed must match the amount billed to the primary carrier. We will coordinate benefits; the provider should not attempt to do this prior to submitting claims.

Members seeking care, regardless of primary insurer, are required to contact their primary care practitioner and use participating providers or obtain appropriate authorization for healthcare professionals outside of the network.

Highmark Wholecare accepts electronic COB transactions via 837 processing in accordance with the implementation guides for both 837 Professional and Institutional processing.

Submitting COB claims electronically will save providers time and eliminates the need for paper claims with copies of the other payer's explanation of benefits (EOB) attached. This will increase quality, consistency and speed of payment.

Please consult with your software vendor to insure they have electronic COB submission capability and work with your EDI vendor to review the HIPAA implementation guide and submission requirements.

### **Claim Coding Software**

Highmark Wholecare uses HIPAA compliant automated coding software to improve accuracy and efficiency in claims processing, payment and reporting and to verify the clinical accuracy of professional and outpatient claims in accordance with clinical editing criteria.

This coding software will review claims against sets of rules that correspond to Current Procedural Terminology (CPT-4), Healthcare Common Procedure Coding System (HCPCS), International Classification of Diseases -version 10 (ICD-10), Revenue Codes, American Medical Association (AMA), and the Centers for Medicare and Medicaid Services (CMS) guidelines as well as industry standards, medical policy and literature and academic affiliations.

The software used is designed to assure data integrity for ongoing data analysis and reviews procedures across dates of service and across providers at the claim, practitioner and practitioner-specialty level.

Our company payment policies focus on areas such as, but not limited to:

- National billing edits including the Correct Coding Initiative (CCI)
- Modifier usage
- Global Surgery period
- Add On code usage
- Age appropriateness
- State Guidelines
- CMS' National Coverage Determinations (NCD's)
- CMS' Local Coverage Determinations (LCD's)

## **Billing**

### **Billing Procedures**

A “clean claim” as used in this section means a claim that has no defect, impropriety, lack of any required substantiating documentation, including the substantiating documentation needed to meet the requirements for encounter data, or particular circumstance requiring special treatment that prevents timely payment; and a claim that otherwise conforms to the clean claim requirement for equivalent claims under Medicare.

In addition, a claim shall be considered “clean” if the appropriate authorization has been obtained in compliance with our company’s Policy and Procedure Manual and the following elements of information are furnished on a standard UB-04 or CMS-1500 claim forms (or their replacement with CMS designations, as applicable) or an acceptable electronic format through our contracted clearinghouse. We may pend or deny a claim if you do not list:

- Patient name, address, date of birth and ID number.
- Patient medical plan identifier.
- Date of service for each covered service.
- Complete service information, including date of service(s), place of service(s), number of services (day/units) rendered, Current Procedural Terminology (CPT) and Healthcare Common Procedure Coding System (HCPCS) procedure codes, with modifiers where appropriate, current ICD-10-CM diagnostic codes by specific service code to the highest level of specificity--inpatient claims include diagnoses at the time of discharge or in the case of emergency room claims, the presenting ICD-10-CM diagnosis code.
- Current National Drug Code (NDC) 11-digit number, NDC unit of measure and NDC units dispensed.
- Name of practitioners/providers and applicable/required National Provider Identifier (NPI) numbers.
- The billing provider address submitted on claims be a physical address.
- Provider Tax Identification Number (TIN).
- Valid CMS place of service code(s). [Place of Service Code Set | CMS](#)
- Billed charge amount for each covered service.
- Primary carrier Explanation of Benefits (EOB) when patient has other insurance
- MS-DRG code for inpatient hospital claims.

The billing provider address submitted on claims must be a physical address. Claims will be rejected if a P.O. Box number is submitted as the billing address. In order to prevent claims from being rejected, please be sure to submit a physical address as the billing address.

Highmark Wholecare processes medical expenses upon receipt of a correctly completed CMS-1500 Form and hospital expenses upon receipt of a correctly completed UB-04 form.

Sample copies of a UB-04 and a CMS-1500 claim forms can be found on the Highmark Wholecare website at <https://providers.highmark.com/wholecare/resource-centers/medicare-resources/medicare-forms-reference-materials>, under General Provider Forms & References. A description of each of the required fields for each form is identified later in this section. Paper

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claim forms must be submitted to original forms printed with red ink.

**NPI**

As mandated in the Affordable Care Act (ACA), all providers of medical or other items or services and suppliers that qualify for a National Provider Identifier (NPI) are required to include their NPI on all claims for payment submitted under the Medicare and Medicaid programs.

Below please find a few highlights of the ACA requirements and company policies and procedures to support these requirements.

- NPIs for billing, rendering, ordering and attending providers are required to be reported on paper claims in addition to electronic claims.
- For imaging and clinical laboratory services and items of durable medical equipment, prosthetics, orthotics, and supplies (DMEPOS), as well as home health services, the NPI of the ordering/referring provider is required in addition to the NPI of the billing provider on paper claims and EDI claims.

Paper and EDI Claims without the required NPI numbers will be rejected and returned to the provider's EDI clearinghouse or returned via US Postal service to the billing address on the claim form and just like rejected EDI claims will not be loaded in our claims system. Providers will be held to timely filing policies in regard to submission of the initial and corrected claims.

**NOTE: Applicable Paper Claim Fields:**

<b>CMS-1500</b> The following fields are to be reported as indicated:	
Field 17b	NPI of Referring Provider (for imaging, clinical laboratory, DMEPOS, and home health) <b>(required)</b>
Field 24J	NPI of Rendering Provider <b>(required)</b>
Field 32a	NPI of Service Facility (if applicable)
Field 33a	NPI of Billing Provider <b>(required)</b>

<b>UB-04</b> The following fields are to be reported as indicated	
Field 56	NPI of Billing Provider <b>(required)</b>
Field 76	NPI of Attending Physician <b>(required)</b>
Field 77	NPI of Operating Physician (if applicable)
Field 78	NPI of Other Physician (if applicable)
Field 79	NPI of Other Physician (if applicable)

All claims must have complete and accurate ICD-10-CM diagnosis codes for claims consideration. If the diagnosis code requires but does not include the fourth or fifth-digit classification, the claim will be denied.

Any person who knowingly files a statement of claim containing any misrepresentation or any

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false, incomplete, or misleading information may be guilty of a criminal act punishable under law and may be subject to civil penalties. By signing a claim for services, the practitioner certifies that the services shown on the claim were medically indicated and necessary for the health of the patient and were personally furnished by the practitioner or an employee under the practitioner's direction. The practitioner certifies that the information contained in the claim is true, accurate and complete.

For the mailing address, please refer to **Claims-Medicare Assured** under the "Important Addresses" section on page 12.

Any questions concerning billing procedures or claim payments can be directed to our Provider Services Department at 1-800-685-5209.

### **Surgical Procedure Services**

Multiple surgeries are separate procedures performed by a single physician or physicians in the same group practice on the same patient in the same operative session or on the same day for which separate payment may be allowed. Our company determines reimbursement of surgical procedures upon the clinical intensity of each procedure and reimburses at 100% for the most clinically intensive surgery, and 50% for the subsequent procedures. Reimbursement for more than 5 procedures requires medical record documentation. Pre- and post-operative visits will only be reimbursed to the extent that they qualify for payment according to the follow-up criteria.

### **Anesthesia Services**

Highmark Wholecare processes anesthesia services based on anesthesia procedure codes only. Anesthesia services should be billed with the correct American Society of Anesthesiologists (ASA) code in the range of 00100-01999, which are included in the CPT manual and reimbursed as time-based anesthesia. All services must be billed in minutes. Fractions of a minute should be rounded to whole minutes (30 seconds or more: round up; less than 30 seconds: round down). For billing purposes, the number of minutes of anesthesia time will be placed in field 24G on the CMS-1500 claim form for all providers who bill in paper format. All anesthesia services should be billed with the appropriate anesthesia modifier.

### **Hospital Services**

Hospital claims are submitted on UB-04 claim forms. To assure that claims are processed for the correct member, the member's 8-digit identification number must be used on all claims. To aid in the recording of payment, patient account numbers recorded on the claim form by the practitioner are indicated in the Patient ID field on the remittance advice.

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**UB-04 Data Elements for Submission of Paper Claim Forms**

EDI requirements must be followed for electronic claims submissions.

Field #	Description	Requirements
1	Provider Name, Address, City, State, Zip Telephone, Fax, Country Code	Required Facility Name and Physical Address where services were rendered (P.O. Box #s is not acceptable here)
2	Pay to Name, Address, City, State, Zip	Required If Different from Billing Provider in Field 1
3a	Patient Control Number	Required
3b	Medical Record Number	Not Required
4	Type of Bill	Required – If 4 Digits Submitted, the Lead 0 will be Ignored
5	Federal Tax Number	Required
6	Statement Covers Period	Required
7	Unlabeled Field	Not Used
8a	Patient Name	Required
9	Patient Address	Required
10	Birthdate	Required
11	Patient Sex	Required
12	Admission Date	Required for Inpatient and Home Health
13	Admission Hour	Not Required
14	Type of Admission/Visit	Required, If Inpatient
15	Source of Admission	Required
16	Discharge Hour	Not Required
17	Patient Status	Required
18-28	Condition Codes	Maybe Required in Specific Circumstances (Consult CMS Criteria)
29	Accident State	Not Used
30	Unlabeled Field	Not Used
31-34	Occurrence Codes and Dates	Maybe Required in Specific Circumstances (Consult CMS Criteria)
35-36	Occurrence Span Codes and Dates	Required, If Inpatient

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37	Unlabeled Field	Not Used
38	Responsible Party Name and Address	Not Required
39-41	Value Codes and Amounts	Required, If Inpatient
42	Revenue Codes	Required
43	Revenue Descriptions	Required
44	HCPCS/Rates/HIPPS Codes	Required, If Outpatient
45	Service Dates	Required, If Outpatient
46	Service Units	Required
47	Total Charges	Required
48	Non-covered Charges	Required, If Applicable
49	Unlabeled Field	Not Used
50	Payer Identification	Required
51	Health Plan ID	Not required
52	Release of Information Certification Indicator	Required
53	Assignment of Benefits	Not Used
54	Prior Payments	Required, If Applicable
55	Estimated Amount Due from Patient	Not Required
56	National Provider ID	Required – NPI Number
57	Other Provider ID	Health Plan Practitioner Identification Number should be entered on paper claims only- legacy number reported as secondary identifier to NPI on electronic claims
58	Insured's Name	Required, If Applicable
59	Patient Relationship to Insured	Required, If Applicable
60	Certificate-Social Security Number- Health Insurance Claim- Identification Number	Health Plan Member Identification Number Required
61	Insurance Group Name	Required, If Applicable
62	Insurance Group Number	Required, If Applicable
63	Treatment Authorization Code	Required, If Applicable
64	Document Control Number	Not Required

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65	Employer Name	Required, If Applicable
66	Diagnosis and Procedure Code Qualifier	Required
67	Principal Diagnosis Code	Required (Coding for Present on Admission data required)
67A-67Q	Other Diagnosis Codes	Required (Coding for Present on Admission data required)
68	Unlabeled Field	Not Used
69	Admitting Diagnosis Code	Required
70A-70C	Patient Reason for Visit	Not Required
71	Prospective Payment System (PPS) Code	Required for DRG Code – If 4 Digits Submitted, the Lead 0 will be Ignored
72	External Cause of Injury Codes	Not Used
73	Unlabeled Field	Not Used
74	Principal Procedure Code and Date	Required, If Applicable
74A-74E	Other Procedure Codes and Date	Required, If Applicable
75	Unlabeled Field	Not Used
76	Attending Provider Name and Identifiers (Including NPI)	Maybe Required in Specific Circumstances (Consult CMS Criteria) If Not Required, Do Not Send
77	Operating Provider Name and Identifiers (Including NPI)	Maybe Required in Specific Circumstances (Consult CMS Criteria) If Not Required, Do Not Send
78-79	Other Provider Name and Identifiers (Including NPI)	Maybe Required in Specific Circumstances (Consult CMS Criteria) If Not Required, Do Not Send
80	Remarks	Maybe Required in Specific Circumstances (Consult CMS Criteria)
81	Code – Code Field	Optional (Consult CMS Criteria)

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**CMS-1500 Data Elements for Submission of Paper Claim Forms**

EDI requirements must be followed for electronic claims submissions.

Field#	Description	Requirements
1	Insurance Type	Required
1a	Insured Identification Number	Health Plan Member Identification Number
2	Patient's Name	Required
3	Patient's Birth Date	Required
4	Insured's Name	Required
5	Patient's Address	Required
6	Patient Relationship to Insured	Required
7	Insured's Address	Required
8	Reserved for NUCC Use	Not Required
9	Other Insured's Name	Required, If Applicable
9a	Other Insured's Policy or Group Number	Required, If Applicable
9b	Reserved for NUCC Use	Not Required
9c	Reserved for NUCC	Not Required
9d	Insurance Plan Name or Program Name	Required, If Applicable
10a,b,c	Is Patient Condition Related to: a) Employment b) Auto Accident c) Other Accident	Required, If Applicable
10d	Claim Codes (Designated by NUCC)	Not Required
11	Insured's Policy Group or FECA Number	Required
11a	Insured's Date of Birth, Sex	Required, If Applicable
11b	Other Claim ID	Required, If Applicable
11c	Insurance Plan Name or Program Name	Required, If Applicable
11d	Is There Another Health Benefit Plan?	Required, If Applicable
12	Patient or Authorized Person's Signature	Required

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Field#	Description	Requirements
13	Insured or Authorized Person's Signature	Required
14	Date of Current: Illness OR Injury OR Pregnancy	Required, If Applicable
15	Other Date	Not Required
16	Dates Patient Unable to Work in Current Occupation	Required, If Applicable
17	Name of Referring Practitioner or Other Source	Required, If Applicable
17a	Other Identification Number of Referring Practitioner	Required, If Applicable
17b	National Provider Identifier (NPI)	Required
18	Hospitalization Dates Related to Current Services	Required, If Applicable
19	Additional Claim Information (Designated by NUCC)	May be Required in Specific Circumstances (Consult CMS Criteria)
20	Outside Lab	Required, If Applicable
21	Diagnosis or Nature of Illness or Injury. (Relate To 24E)	Required
22	Resubmission Code and/or Original Ref. No	Required, If Applicable
23	Prior Authorization Number	Required, If Applicable
24A	Date(s) of Service	Required
24B	Place of Service	Required
24C	EMG	Required, If Applicable
24D	Procedures, Services, or Supplies CPT/HCPCS/Modifier	Required
24E	Diagnosis Code Pointer	Required
24F	Charges	Required
24G	Days or Units	Required
24H	EPSDT Family Plan	Required, If Applicable
24I	ID Qualifier	Required, if applicable
24J	Rendering Provider ID	Required

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Field#	Description	Requirements
25	Federal Tax Identification Number, SSN/EIN	Required
26	Patient Account Number	Required
27	Accept Assignment	Required
28	Total Charge	Required
29	Amount Paid (Required when another carrier is primary payer)	Required, If Applicable
30	Reserved for NUCC Use	Not Required
31	Signature of Physician or Supplier including degrees or credentials/date	Required Health Plan Individual Practitioner Name and Date Required
32	Service Facility Location Information	Required. Facility Name and Physical Address where Services were Rendered Required (P.O. Box #s are not acceptable here.
32a	Name and Address of Facility Where Services Were Rendered (If other than Home or Office)	Required
32b	Other ID#	Required, If Applicable
33	Billing Provider Info and Phone #	Required Facility Name and Physical Address where services were rendered (P.O. Box #s is not
33a	NPI number	Required
33b	Other ID#	Required. If Applicable

## Federally Qualified Health Centers (FQHC)/ Rural Health Clinics (RHC)

### Overview

In accordance with the Centers for Medicare and Medicaid Services (CMS) Highmark Wholecare Medicare Assured requires FQHCs and RHCs to submit qualified visits using established specific payment codes. The FQHC/RHC Medicare Assured Billing Guide is ONLY applicable to those practices who are contracted under an Ancillary Services Agreement. FQHCs contracted under an Ancillary Services Agreement are reimbursed at the CMS Prospective Payment System (PPS) rate. RHCs contracted under an Ancillary Services Agreement are reimbursed at the CMS All-inclusive Rate (AIR).

### Encounter Definition

Rates are charged for each Encounter. An eligible Encounter is defined as:

Medical Service Encounter: An encounter between a medical provider and a patient during which medical services are provided for the prevention, diagnosis, treatment, or rehabilitation of illness or injury. Family planning encounters and obstetrical encounters are a subset of medical encounters.

Eligible Providers include:

1. Physician (including Podiatrists)
2. Psychiatrist
3. Mid-level Practitioners:
  - CRNP (midwife or a licensed nurse practitioner)
  - Licensed Physician Assistant
  - Speech, Physical & Occupational Therapist
  - Audiologist
  - Chiropractor
  - Case Manager
  - Nutritionists
  - Licensed Social Workers
  - Licensed Professional Counselors (LPC)
  - Marriage & Family Therapist and Mental Health Counselors
  - Licensed Clinical Psychologist
  - CRNP with a mental health certification

### Prospective Payment System (PPS) Methodology for Medicare

Refer to the MLN Matters® Articles for the FQHC and RHC to determine the appropriate encounter code that drives the PPS rate payment:

- Article titled MLN Matters Implementation of a Prospective Payment System (PPS) for Federally Qualified Health Centers (FQHCs)
  - MLN Matters® Number: MM8743
- Article titled MLN Matters Required Billing Updates for Rural Health Clinics
  - MLN Matters® Number: MM9269 Revised

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For more information visit the FQHC-RHC resources webpage and review the FQHC/RHC Annual Training Provider Orientation PowerPoint.

<https://providers.highmark.com/wholecare/provider-resources/fqhc-rhc-resources>

**Multiple Encounter Submission**

Encounters with more than one eligible practitioner and multiple encounters with the same eligible practitioner that take place on the same date, at a single location, and that have the same diagnosis constitute a single encounter. The following two conditions are recognized for payment of more than one encounter rate on the same day:

1. After the first encounter, the member suffers a different illness or injury requiring additional diagnosis or treatment; and
2. The patient has a medical visit, a behavioral health visit, or a dental visit on the same day.
  - The medical necessity of multiple encounters must be clearly documented in the medical record. Providers must exercise caution when billing for multiple encounters on the same day, and such instances are subject to post-payment review to determine the validity and appropriateness of multiple encounters.
  - Providers may not inappropriately generate multiple encounters by unbundling services that are routinely provided together during a single visit or scheduling multiple patient visits for services that could be performed at a single visit.
  - Include only one encounter per claim. Claims with more than one encounter listed will be denied. When billing for more than one encounter per day, submit one claim for each encounter. On each claim, to indicate it is a separate encounter, enter "unrelated diagnosis" and the time of both visits in field 19 on the CMS-1500 Claim Form or in the Comments field when billing electronically.
  - Documentation for all encounters must be kept in the member's file.

All participating FQHCs/RHCs providers are required to bill with the following Place of Service Code.

50	Federally Qualified Health Center	A facility located in a medically underserved area that provides Medicare beneficiaries preventive primary medical care under the general direction of a physician.
72	Rural Health Clinic	A certified facility which is in a rural medically underserved area that provides ambulatory primary medical care under the general direction of a physician.

For services rendered at an FQHC or RHC facility, please do not bill with POS 11.

All claims must be billed with the appropriate FQHC or RHC qualified encounter code for Medicare. Total charges for the encounter should be billed with appropriate approved E&M code(s) from the current Medicare Fee Schedule. Claims submitted with just the encounter code will not be paid.

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All practitioners must come over on the FQHC/RHC Provider Change Form or Roster Template and be set up with the plan's credentialing/claims system prior to rendering services. All FQHCs/RHCs must have a collaborative agreement on file between the physicians, and extender(s) on staff. For more information on the FQHC/RHC Provider Process refer to the Policies and Procedures section of the manual.

### **Timely Filing**

All claims, including corrected claims, must be filed within three hundred sixty-five (365) days from the date of service. We prefer to receive claims electronically, but we do accept claims submitted on paper. If you bill on paper, we will only accept paper claims on a CMS-1500, or a UB-04 claim form. No other billing forms will be accepted.

For more information visit the Medicare Website at: <https://www.cms.gov/medicare/coding-billing/electronic-billing/professional-paper-claim-form>

UB-04 and CMS-1500 Claim Forms can be found on the provider website at <https://providers.highmark.com/wholecare/resource-centers/medicare-resources/medicare-forms-reference-materials>, under General Provider Forms & References.

For more Claims and Billing information, refer to the Claims and Billing Sections:

- Member Billing Policy
- General Information
- Electronic Claims Submission
- Requirements for Submitting Claims to Highmark Wholecare through SDS-Smart Data Solutions
- HIPAA 5010
- Claim Payments (Electronic Remittance Advice/Electronic Funds Transfer)
- Claims Review Process
- Coordination of Benefits
- Claim Coding Software
- Billing Procedures
- UB-04 Data Elements for Submission of Paper Claim Forms
- CMS-1500 Data Elements for Submission of Paper Claim Forms

Any claim that has been submitted to our company but does not appear on a remittance advice within sixty (60) days following submission should be researched by calling the Provider Services Department to inquire whether the claim was received and/or processed.

## **APPEALS AND GRIEVANCES**

### **Introduction**

Highmark Wholecare encourages its members to let us know right away if they have questions, concerns, or problems related to covered services or the care that they receive. Members are encouraged to contact Member Services for assistance.

This section provides an outline of rules for making complaints in different types of situations. Federal law guarantees a member's right to make complaints regarding concerns or problems with any part of their medical care as a plan member. The Medicare program has set forth requirements for the filing and processing of member complaints. If a member or authorized representative files a complaint, we are required to follow certain processes when we receive it. We must be fair in how we handle it, and we are not permitted to dis-enroll or penalize a member in any way for making a complaint.

### **What Are Appeals and Grievances?**

Members have the right to make a complaint if he or she has concerns or problems related to coverage or care. "Appeals" and "grievances" are the two different types of complaints that can be made.

An "appeal" can be filed if a member asks Highmark Wholecare to reconsider and change a decision we have made about what services or benefits are covered or what we will pay for a service or benefit. A member may file an appeal under these circumstances:

- If we refuse to cover or pay for services a member thinks we should cover
- If we or one of our plan providers reduces or cuts back on services or benefits that a member has been receiving, or
- If a member believes that we are stopping coverage of a service or benefit too soon

A "grievance" is the type of complaint that can be made if a member has any other type of problem with Highmark Wholecare or one of our plan providers. For example, grievances may be filed if a member is experiencing a problem regarding the following situations:

- The quality of care by a plan provider
- Waiting times for appointments or in the waiting room
- Provider behavior or the behavior of the provider's office staff
- Not being able to reach someone by phone or get the information needed, or
- The cleanliness or condition of a provider's facilities

Generally, grievances should be filed directly with Highmark Wholecare, but for matters related to quality of care, members also have the opportunity to file such complaints with a Quality Improvement Organization (QIO). The QIO in Pennsylvania is Commence Health. QIO quality of care reviews are discussed on page 128.

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**Acting as an Authorized Representative**

Highmark Wholecare will accept appeals or grievances made by the member and/or his/her authorized representative or the prescribing physician or other prescriber or a non-participating provider involved in the member's care. A member may have any individual (relative, friend, advocate, attorney, congressional staff member, member of advocacy group, or suppliers, etc.) act as his/ her representative, as long as the designated representative has not been disqualified or suspended from acting as a representative in proceedings before CMS or is otherwise prohibited by law.

In order to act as a representative, the member and representative must complete the Appointment of Representative Form (AOR) which is located on the Highmark Wholecare website at

<https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/Forms/AppointmentOfRepresentationForm.pdf> or an equivalent document.

The appointment remains valid for a period of one year from either the date signed by the party making the appointment or the date the appointment is accepted by the representative, whichever is later. The appointment is also valid for any subsequent levels of appeal on the claim or service in question unless the member specifically withdraws the representative's authority.

If the requestor is the member's legal guardian or otherwise authorized under State law, no appointment is necessary. We will require submission of appropriate documentation, such as a durable power of attorney.

A physician who is providing treatment to a member (upon providing notice to the member) may request an appeal on the member's behalf without having been appointed as the member's representative.

A provider that has furnished services or items to a member may represent that member on the appeal; however, the provider may not charge the member a fee for representation. Providers who do not have a contract with our company must sign a "Waiver of Liability" statement that the provider will not require the member to pay for the medical service under review, regardless of the outcome of the appeal. The "Waiver of Liability" can be found on the Highmark Wholecare website at

<https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/Forms/MedicareWaiverOfLiabilityForm.pdf>.

It is important to note that the appeals process will not commence until Highmark Wholecare receives a properly executed AOR or for payment appeals from non-participating providers, a properly executed Waiver of Liability statement.

### **Appeals Regarding Hospital Discharge**

There is a special type of appeal that applies only to hospital discharges. If a member feels that the Highmark Wholecare coverage of a hospital stay is ending too soon, the member or his or her authorized representative can appeal directly and immediately to the Quality Improvement Organization (QIO). Quality Improvement Organizations are assigned regionally by the Centers for Medicare and Medicaid Services (CMS). The QIO for the state of Pennsylvania is Commence Health. The QIOs are groups of health professionals that are paid to handle this type of appeal from Medicare patients. When such an appeal is filed on time, the stay may be covered during the appeal review. One must act very quickly to make this type of appeal, and it will be decided quickly.

If a member believes that the planned discharge is too soon, the member or his/her authorized representative may ask for a QIO review to determine whether the planned discharge is medically appropriate. "The Important Message from Medicare" document given to the member within two days of admission and copied to the member within two days of discharge provides the appeal information as well as the QIO name and telephone number.

In order to request a QIO review regarding a hospital discharge, the member or his or her authorized representative must contact the QIO no later than midnight of discharge date and before leaving the hospital. If this deadline is met, the member is permitted to stay in the hospital past the planned discharge date without financial liability. If the QIO reviews the case, it will review medical records and provide a decision within one (1) calendar day after it has received the request and all of the medical information necessary to make a decision. If the QIO decides that the discharge date was medically appropriate, the member will have no financial liability until noon of the day after the QIO provides its decision. If the QIO decides that the discharge date was too soon and that continued confinement is medically appropriate, we will continue to cover the hospital stay for as long as it is medically necessary.

If the member or his/her authorized representative does not ask the QIO for a review by the deadline, the member or authorized representative may ask our company for an expedited appeal. If the member or authorized representative asks us for an expedited appeal of the planned discharge and stays in the hospital past the discharge date, he or she may have financial liability for services provided beyond the discharge date. This depends on the expedited appeal decision. If the expedited appeal decision is in the member's favor, we will continue to cover the hospital care for as long as it is medically necessary. If the expedited appeal decision is that continued confinement was not medically appropriate, we will not cover any hospital care that is provided beyond the planned discharge date, unless an Independent Review Entity (IRE) review overturns our decision.

### **Skilled Nursing Facility (SNF), Home Health (HHA) or Comprehensive Outpatient Rehabilitation Facility (CORF) Services**

There is another special type of appeal that applies only when coverage will end for SNF, HHA or CORF services. If a member feels that coverage for these services is ending too soon, he or she can appeal directly and immediately to the QIO. As with hospital services, these services may be covered during the appeal review if filed on time.

If Highmark Wholecare and/or the care provider decide to end coverage for SNF, HHA or CORF a written Notice of Medicare Non-Coverage (NOMNC) must be delivered to the member at least two (2) calendar days before coverage ends or the second to the last day of service if care is not being provided daily (such as HHA). The member or authorized representative will be asked to sign and date this document. Signing the document does not mean that the member agrees to the decision, only that the notice was provided. After the NOMNC is completed, the provider must retain a copy in the provider's records.

### **Quality Improvement Organization (QIO) Review**

For these types of services, members have the right by law to ask for an appeal of a termination of coverage. As will be explained in the notice referenced above, the member or his or her authorized representative can ask the QIO to do an independent review of whether terminating coverage is medically appropriate.

The notice will provide the name and phone number of the appropriate QIO agency. If the member receives the termination notice two days before coverage is scheduled to end, the member must contact the QIO no later than noon of the day following the day the notice is received. If the notice is received more than two (2) days prior to the scheduled end in coverage, the QIO must be contacted no later than noon of the day before the scheduled termination of coverage.

If the QIO reviews the case, the QIO will ask for the member's opinion about why the services should continue. The response is not required in writing. The QIO will also look at medical information, talk to the doctor, and review other information that our company provides to the QIO. It is important that the provider immediately faxes all of the member's medical records to the QIO for their review. Our company will provide both the member and the QIO a copy of the explanation for termination of coverage of these services.

After reviewing all the information, the QIO will decide whether it is medically appropriate for coverage to be terminated on the date that has been set for the member. The QIO will make this decision within one (1) full day after it receives the information necessary to make a decision. If the QIO decides in favor of the member, our company will continue to cover the stay for as long as medically necessary. If the QIO decides that our decision to terminate coverage was medically appropriate, the member will be responsible for paying the SNF, HHA or CORF charges after the termination date that appears on the advance notice. Neither Original Medicare nor our company will pay for these services. If the member agrees to discontinue receiving services on or before the date given on the notice, there will be no financial liability.

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If the member or his/her authorized representative does not ask the QIO for a review in a timely manner, the member or authorized representative may request an expedited appeal. It is important to note that if the member or authorized representative requests an expedited appeal regarding termination and services continue to be provided, the member may have financial liability if services are provided beyond the termination date.

If our company staff decides upon expedited appeal review that services are medically necessary to continue, we will continue to cover the care for as long as medically necessary. If the decision is not in the member's favor, we will not cover any of the care that was provided beyond the termination date, and the member may be financially responsible.

**Appeals for Coverage of Other Medical Services**

After our company has issued an organization determination, a member or authorized representative may file an appeal. If we deny all or part of a request for coverage of services or payment for services, a member may ask for us to reconsider our decision. This is called a request for reconsideration. A member or authorized representative may call Member Services or file a reconsideration or get assistance in filing. We can also accept written requests for appeal which can be forwarded to the address below or fax to the Appeals Department at 412-255-4503. All appeals must be filed within sixty-five (65) calendar days of any initial denial notice. Additional time may be granted for good cause. Any requests for good cause extensions must be completed in writing.

The first step of the appeal process is referred to as a request for reconsideration. If the member's medical condition warrants it, an expedited appeal may be requested. Our company's staff will make every effort to gather all the information needed in order to make a decision about the appeal. Qualified individuals who were not involved in making the initial coverage determination will review the appeal. Members also have the right to obtain and provide additional information as part of the appeal. Additional information in support of the members' appeal may be provided in writing.

For the mailing address, please refer to **Member Appeals & Grievances** under the "Important Addresses" section on page 13.

Information may also be provided by fax at: 412-255-4503 or by calling Member Services at 1-800-685-5209 to submit a verbal appeal or schedule to submit in person.

Members or authorized representatives also have the right to ask us for a copy of the information that pertains to their appeal. Members may call Member Services at the number listed above in order to make such a request.

For a decision about payment for care already received, the appeal must be finalized by our company within sixty-five (65) days, which includes payment for the services or forward the appeal to the Independent Review Entity (IRE) for review. For a standard review about medical care not yet provided, we must finalize the appeal within thirty (30) days or sooner if the member's health condition warrants. If the request is for a Medicare Part B prescription drug

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not yet received, we must finalize the appeal within seven (7) calendar days of receipt of an appeal.

For expedited appeals regarding medical care or Part B drugs, our company has up to 72 hours to make a decision but will make it expeditiously as the enrollee's health condition requires. All adverse reconsideration decisions are automatically forwarded to the IRE for review. Also, if we do not issue a decision within the standard or expedited timeframes as outlined above, the appeal will be automatically forwarded to the IRE for review. The IRE has a contract with CMS and is not part of our company.

When the appeal is for services that have not been received, if the member requests an extension, or

- The extension is justified and in the enrollee's interest due to the need for additional medical evidence from a non-contract provider that may change an MA plan's decision to uphold a denial; or
- The extension is justified due to extraordinary, exigent or other non-routine circumstances.

We cannot take extra time when the appeal is for a Part B prescription drug.

Upon completion of the reconsideration, all parties to the appeal will be notified of the outcome. If the decision is a denial, the member or authorized representative will be verbally notified that their appeal has been forwarded to the IRE.

### **IRE Review**

Our company will automatically forward all adverse reconsideration decisions to the IRE. The member may request a copy of the file that is provided to the IRE for review. The IRE will notify the member of the receipt of the appeal, review the request and make a decision about whether we must provide the care or payment for the care in question. For appeals regarding payment of services already received, the IRE has up to sixty (60) calendar days to issue a decision. For standard appeals regarding medical care not yet provided, the IRE has up to thirty (30) calendar days to issue a decision, if the appeal is for a Part B prescription drug the IRE must decide within seven (7) calendar days. For expedited appeals regarding medical care, the IRE has up to 72 hours to make a decision. These timeframes can be extended by up to fourteen (14) calendar days if more information is needed and the extension is in the members' best interest. The IRE cannot take an extension if the appeal is for a Part B prescription drug.

The IRE will issue its decision in writing to the member or authorized representative and the plan. If the decision is not in the member's favor, the member may have the opportunity to pursue coverage of the services through the review of an Administrative Law Judge (ALJ).

### **Administrative Law Judge Review**

If the IRE decision is not in the member's favor, and if the dollar value of the contested benefit meets minimum requirements the member or his or her authorized representative may ask for an Administrative Law Judge (ALJ) to review the case. The ALJ also works for the federal government. The IRE decision letter will instruct the member how to request an ALJ review.

During an ALJ review, the member may present evidence, review the record, and be represented by an attorney. The ALJ will not review the appeal if the dollar value of the medical care is less than the minimum requirement, and there are no further avenues for appeal. The ALJ will hear the case, weigh all of the evidence and make a decision as soon as possible.

The ALJ will notify all parties of the decision. The party against which the decision is made has the opportunity to request a review by the Medicare Appeals Council. The decision issued by the ALJ will inform the member how to request such a review.

### **Medicare Appeals Council**

The party against whom the ALJ decision is made has the right to request the review by the Medicare Appeals Council (MAC). This Council is part of the federal department that runs the Medicare program. The MAC does not review every case it receives. When it receives a case, the MAC decides whether to conduct the review. If they decide not to review the case, either party may request a review by a Federal Court Judge; however, the Federal Court Judge will only review cases when the amount in controversy meets the minimum requirement.

### **Federal Court**

The party against whom the Medicare Appeals Council decision is made has the right to file the case with Federal Court if the dollar value of the services meets the minimum requirements. If the dollar value of the service in question is less, the Federal Court Judge will not review it and there is no further right of appeal.

### **Appeals for Coverage of Part D Drugs**

Our company encourages its members to contact us through Member Services with any questions concerns or problems related to prescription drug coverage. As with medical services, we also have processes in place to address various types of complaints that members may have regarding their prescription drug benefits.

Prescribing physicians or other prescribers who feels that an enrollee's life or health is in serious jeopardy may have immediate access to the Part D appeal process by calling 1-800-213-7083. Prescribers may also use this number to address process or status questions regarding the Part D appeal process.

An "appeal" is any part of the procedures that deal with the review of an unfavorable coverage determination. A member or his/her authorized representative may file an appeal if he/she

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wants us to reconsider and change the decision we have made about what Part D prescription drug benefits are covered or what we will pay for a prescription drug. This is called a redetermination.

It is important to note that if our company approves a member's exception request for a non-formulary drug, the member may not request an exception to the copayment that applies to that drug.

Problems getting a Part D prescription drug that may be addressed by an appeal are as follows:

- If the member is not able to get a prescription drug that may be covered.
- If a member has received a Part D prescription drug that may be covered but we have refused to pay for the drug.
- If we will not pay for a Part D prescription drug that has been prescribed because it is not on the formulary.
- If a member disagrees with the copayment amount.
- If coverage of a drug is being reduced or stopped.
- If there is a requirement to try other drugs before the prescribed drug is covered
- If there is a limit on the quantity or dose of the drug.

There are several steps that members may use to request care or payment from our company. At each step, qualified personnel evaluate the request, and a decision is made. If the decision is not in the member's favor, there are subsequent appeal options available.

After our company has issued a coverage determination, a member or authorized representative or prescribing physician or other prescribers may file an appeal, also commonly referred to as a request for redetermination. All appeals must be filed within sixty (60) calendar days from the date of the coverage determination. If the member's life, health, or ability to regain maximum function is in jeopardy, an expedited appeal may be requested. Our associates will make every effort to gather all the information needed in order to make a decision about the appeal. Qualified individuals who were not involved in making the coverage determination will review each request. Members have the right to obtain and provide additional information as part of the appeal. Additional information in support of the members' appeal may be provided in writing.

For the mailing address, please refer to **Member Appeals & Grievances** under the "Important Addresses" section on page 13.

Information may also be provided by fax at 412-255-4503 OR call Member Services at 1-800-685-5209 to submit a verbal appeal or schedule to submit in person.

Members also have the right to ask us for a copy of the information that pertains to their appeal. Members or Providers may reach the Member Services as indicated above in order to make such a request.

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Upon completion of the redetermination, the member and parties to the appeal will be notified of the decision. For a standard pre-service decision about a Part D drug, we have up to seven (7) calendar days to issue a decision and authorize the drug in question.

If the member's health condition requires it, the decision will be issued sooner. If we do not issue a decision within seven (7) calendar days, the request will automatically be forwarded to the Independent Review Entity (IRE) for review.

If the request is for reimbursement for a Part D Drug that has already been decided, then we must authorize payment for the benefit within 14 calendar days from the date it receives the request and make payment (i.e., mail the payment) no later than thirty (30) calendar days after the date we received the request.

For an expedited appeal regarding Part D drugs that have not been provided, we have up to seventy-two (72) hours to issue a decision and authorize the requested medication. However, it will make it expeditiously as the enrollee's health condition requires. If an expedited appeal was requested and our company does not comply with the seventy-two (72) hour timeframe, the case will automatically be forwarded to the IRE for review.

If the redetermination does not result in the approval of the drug under review, the member may ask for review by an IRE. It is important to note that IRE review of Part D drug denials is not automatic as it is for medical services. The IRE has a contract with the federal government and is not part of our company.

### **Independent Review Entity (IRE)**

The member or his or her authorized representative must submit a request to the IRE in writing within sixty-five (65) calendar days of the appeal decision notice. An expedited IRE is also available if the member's condition requires it. The IRE's name and address will be included in this notice. If a member requests review by IRE, the IRE will review the request and make a decision about whether our company must cover or pay for the medication. For an expedited IRE review, the IRE must issue a decision within 72 hours. For a standard IRE review, the IRE has up to seven (7) calendar days to issue the decision. Fourteen (14) calendar days to issue a decision on payment.

The IRE will issue its decision in writing, explaining the reasons for the decision. If the decision is in the member's favor and the member has already paid for the medication, we will reimburse the member within thirty (30) calendar days of the IRE's decision. We will also send the IRE confirmation that we have honored their decision. If the decision is in the member's favor and the member has not yet received the drug, we will authorize the medication within 72 hours of receiving the decision notice. Confirmation will be sent to the IRE in this situation as well.

If an expedited IRE review was conducted, we will authorize the medication within 24 hours of receiving the IRE's decision notice. If the member is not satisfied with the result of the IRE review, he or she may request the review by an Administrative Law Judge.

### **Administrative Law Judge (ALJ) Review**

If the decision is not in the member's favor, the member or his/her authorized representative may request the review by an ALJ. In order to request a review by an ALJ, the value of the drug in question must meet minimum requirements. To calculate the amount in controversy, the dollar value of the drug will be projected based on the number of refills prescribed for the requested drug during the plan year. This projected value includes co-payments, all expenses incurred after the members' expenses exceed the initial coverage limit and any expenses paid by other entities. Claims may also be combined to meet the dollar value requirement if the claims involve the delivery of Part D drugs to the member, if all claims have been reviewed by the IRE, each of the combined requests are filed in writing within the sixty (60) day filing limit, and the hearing request identifies all of the claims to be heard by the ALJ.

The request must be made in writing within sixty (60) calendar days of the date of the IRE decision. The member may request an extension of the deadline for good cause. During the ALJ review, the member or appointed representative may present evidence, review the record, and be represented by counsel.

The ALJ will hear the member's case, weigh all of the evidence submitted, and issue a decision as soon as possible. The ALJ will issue a decision in writing to all parties.

If the decision is in the member's favor and the member has already received and paid for the drug in question, our company will reimburse the member within thirty (30) calendar days from the date we receive the ALJ decision. If the decision is in the member's favor and the member has not yet received the drug in question, we will authorize the medication within 72 hours of the date we receive the ALJ decision. In cases where an expedited ALJ review was requested, we will authorize the medication within 24 hours of receiving the ALJ notice.

If the ALJ rules against the member, the ALJ notice will provide instructions on how to request a review by the Medicare Appeals Council.

### **Medicare Appeals Council**

If the decision of the ALJ is not in the member's favor, Medicare Appeals Council (MAC) review may be requested. The MAC is part of the federal department that runs the Medicare program. There is no minimum dollar value for the MAC to conduct a review. The MAC does not review every case it receives. When it gets a case, it decides whether to review the case. If the MAC decides not to review the case, a written notice will be issued, and this notice will advise the member if any further action can be taken with respect to the request for review. The notice will instruct the member how to request a review by a Federal Court Judge.

If the MAC reviews the case, it will inform all parties of its decision in writing. If the decision is in the member's favor and the member has already received and paid for the drug in question, our company will reimburse the member within thirty (30) calendar days of receiving the MAC notice.

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If the decision is in the member's favor, but the member has not yet received the drug in question, we will authorize the drug within 72 hours of receiving the MAC notice. If an expedited MAC review was requested and the decision is in the member's favor, we will authorize the drug within 24 hours of receiving the MAC notice.

If the MAC reviews the case and the decision is not in the member's favor, the member may request a judicial review, but only if the dollar value of the medication meets minimum requirements.

### **Federal Court**

If the member is not satisfied with the decision made by the MAC, in order to request judicial review of the case, the member must file civil action in a United States District Court. The MAC letter will explain how to do this. The dollar value of the drug in question must meet the minimum requirement to go to a Federal Court. The federal judiciary is in control of the timing of any decision.

If the Judge decides in the member's favor, our company is obligated to authorize or pay for services under the same time constraints as outlined above. If the Judge issues a decision that is not in the member's favor, the decision is final and there is no further right of appeal.

### **Amount in Controversy, Federal Minimum Requirements for Filing**

Appeal Level	Calendar Year 2023	Calendar Year 2024	Calendar Year 2025	Calendar Year 2026
ALJ Hearing	\$180	\$180	\$190	Not yet available
Judicial Review	\$1,850	\$1,840	\$1,900	Not yet available

### **Member Grievances**

Grievance is different from an appeal in that it usually does not involve coverage or payment for benefits. Concerns about failure to pay for a certain drug or service should be addressed through the appeals processes.

The member grievance process may be used to address other problems related to coverage, such as:

- Problems with waiting on the phone or in the pharmacy.
- Disrespectful or rude behavior by pharmacists or other staff.
- The cleanliness or condition of a network pharmacy.
- If a member disagrees with our decision not to expedite a request for coverage determination.
- If our company does not provide a decision within the required timeframe.
- If our company does not forward a case to an IRE if we do not comply with required timeframes for reconsideration.
- If our company does not provide the member with required notices.

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Members also have the opportunity to file expedited grievances under certain conditions-see page 127.

Members are encouraged to contact our Member Services first in order to be provided with immediate assistance. Our associates will try to resolve any complaint over the telephone. If a written response is requested, one will be provided. If our Member Services staff is not able to resolve the telephone complaint, we will provide a written response to the member. Our company employs a formal, multi-disciplinary process to review member grievances. Members may file a grievance by calling our Member Services Department or by writing to Highmark Wholecare.

For the mailing address, please refer **Member Appeals & Grievances** under the "Important Addresses" section on page 13.

Information may also be provided by fax on 412-255-4503 or by telephone at 1-800-685-5209.

If the member would like to have someone else file a grievance on their behalf, an Appointment of Representative Form (AOR) must be completed. The form is located on the Highmark Wholecare website at <https://providers.highmark.com/content/dam/highmark/en/providerresourcecenter/wholecare/Forms/AppointmentOfRepresentationForm.pdf>. Grievances must be filed within sixty (60) days of the date of the incident.

Upon receipt of any standard grievance, we will send the member an acknowledgement letter. The acknowledgement letter will include details of the member's grievance, explain the grievance process and inform the member of their rights during the grievance process.

### **Grievances**

The member or the authorized representative will have the opportunity to submit any information, documentation, or evidence regarding the grievance. Our company will conduct a full and thorough investigation of the substance of the complaint including any aspect of clinical care involved. The member or the member's representative will be notified orally or sent a written response as quickly as the case requires based on the member's health status, but no later than thirty (30) calendar days after receiving the grievance. We may extend the timeframe by up to fourteen (14) calendar days if the member requests the extension or if we justify a need for additional information and the delay is in the member's best interest.

### **Expedited Grievances**

Our company also has a process in place where it may be necessary to expedite the review of a grievance because the member's life, health, or ability to regain maximum function is in jeopardy.

Members may file expedited grievances in the following circumstances:

- When we have extended the timeframe to make an Organization Determination.
- When we have extended the timeframe to resolve a Reconsideration.
- When we have refused to grant a member's request for an expedited Organization

Determination.

- When we have refused to grant a member's request for an expedited Reconsideration (Appeal).

The circumstances outlined above are the only times that an expedited grievance review is available. When an expedited grievance is filed, we will take prompt, appropriate action, including a full investigation within 24 hours of receiving the request. The member or representative will be notified of the decision by telephone within 24 hours of filing the Expedited Grievance, and a letter explaining the decision will follow within three (3) days.

### **Quality Improvement Organization Review**

Complaints concerning the quality of care received under Medicare may be investigated and acted upon by our company under the internal grievance process or by an independent organization called the Quality Improvement Organization (QIO) or by both. For example, if member believes that his or her pharmacist provided the incorrect dosage of a prescription or was prescribed a medication in error, the enrollee may file a complaint with the QIO in addition to or instead of a complaint filed under the plan sponsor's grievance process. For any complaint filed with the QIO, our company must cooperate with the QIO in resolving the complaint this includes directing providers to respond to QIO requests for information within 14 days.

### **How to File a Quality-of-Care Complaint with the QIO**

QIOs are assigned regionally by CMS. For members who reside in Pennsylvania, quality of care complaints filed with the QIO must be made in writing to the following address:

BFCC-QIO Program  
Commence Health  
PO Box 2687  
Virginia Beach, VA 23450  
Phone: 1-888-396-4646  
Fax: 1-855-236-2423  
TTY: 888-985-2660

### **Clinical Provider Appeals**

All providers participating with our health plan may file a formal provider appeal to request the review of any post-service denial for payment denied due to medical necessity or for lack of prior authorization. This process is intended to afford providers with the opportunity to address issues regarding payment only. Appeals for services that have not yet been provided must follow the Member Reconsideration or Redetermination processes above. The formal Provider Appeal Process must be initiated by the provider through a written request for an appeal.

For the mailing address, please refer to **Clinical Provider Appeals** under the "Important Addresses" section on page 13 or fax to 1-855-501-3904.

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Providers who are non-contracted with our company may also file an appeal; however non-contracted providers must follow the member appeals process for reconsiderations as outlined above.

### **Clinical Provider Appeal Process**

#### **First Level Provider Appeal**

1. To request a provider appeal, providers must make a written request for appeal which must be received by the plan within:
  - a. Sixty (60) calendar days of the date of their denial notice denying an authorization unless otherwise negotiated by contract. In this instance, there is a denied authorization, however, services have already been provided.
  - b. One hundred and eighty (180) calendar days of the date of their denial notice denying a post- service claim unless otherwise negotiated by contract. When an authorization has been denied, provider must adhere to the sixty (60) calendar-day time frame, the one hundred and eighty (180) calendar days once the claim has denied does not apply.
2. When submitting a written request for an appeal, the provider is required to submit any and all supporting documentation including, but not limited to, a copy of the denied claim, the reason for the appeal, and the member's medical records containing all pertinent information regarding the services rendered by the provider.
3. All first level provider appeal reviews will be completed within sixty (60) calendar days of the date the written request was received.
4. The provider will be informed of the decision in writing by mailing/faxing notification within sixty (60) calendar days from receipt. This notification will include additional appeal rights as applicable (i.e., Second Level Provider Appeal-see below). If the appeal is approved, payment will be issued within sixty (60) calendar days of notification.

#### **Second Level Provider Appeal**

1. If the provider is not in agreement with the first level provider appeal committee's decision, the provider may seek a second level provider appeal. A request for a second level provider appeal must be submitted to the plan in writing within sixty (60) calendar days of the date on the first level provider appeal decision letter, or as otherwise indicated via contract. All second level provider appeal requests must include specific reasons as to why the provider does not agree with the plans' first level provider appeal committee's decision along with any additional supporting documentation.
2. All second level provider appeal reviews will be completed within sixty (60) calendar days from the date the second level provider appeal request was received.

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3. The second level appeal committee will inform the provider of its decision in a written/fax decision notice within sixty (60) calendar days. This is the final level of appeal, and the decision is binding, unless otherwise governed per contract.

## **MODEL OF CARE**

Website location: <https://providers.highmark.com/wholecare/resource-centers/medicare-resources/model-of-care>

### **Overview**

As a Special Needs Plan (SNP), Highmark is required by the Centers for Medicare and Medicaid Services (CMS) to administer a Model of Care (MOC) Plan. In accordance with CMS guidelines, Highmark's SNP MOC Plan is the basis of design for our care management policies, procedures, and operational systems that will enable our Medicare Advantage Organization (MAO) to provide coordinated care for special needs individuals.

Highmark D-SNP has a MOC that has goals and objectives for the targeted populations, a specialized provider network, uses nationally recognized clinical practice guidelines, conducts health risk assessments to identify the special needs of beneficiaries, and adds services for the most vulnerable beneficiaries including, but not limited to, those beneficiaries who are frail, disabled, or near the end-of-life.

The SNP MOC includes four main sections: Description of the SNP population (General Population), Care Coordination, Provider Network, and MOC Quality Measurement and Performance Improvement. This SNP Provider Network section explains what MOC measurements and Highmark expects from their providers.

### **Provider Network**

The SNP provider network is a network of health care providers who are contracted to provide health care services to SNP beneficiaries. SNPs must ensure that their MOC identifies, fully describes, and implements the following elements for their SNP provider networks.

This MOC section contains three Elements:

- Specialized Expertise
- Use of Clinical Practice Guidelines and Care Transition Protocols
- MOC Training for the Provider Network

Within the above elements, Highmark's D-SNP expectations of providers are explained in detail. Below is a summary of Highmark's provider network composition and responsibilities.

1. Highmark D-SNP expects all network practicing providers to utilize the most up to date clinical practice guidelines when providing care to members to ensure the right care is being provided at the right time, as well as to reduce inter-practitioner variation in diagnosis and treatment.
2. Highmark D-SNP encourages practitioners to follow the adopted clinical practice guidelines but allows the practitioners to execute treatment plans based on a member's medical needs and wishes. When appropriate, behavioral health guidelines are followed utilizing national clinical criteria.
3. During a care transition, it is expected that the transferring facility will provide a

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discharge summary and care plan information to the receiving facility **within one business day**. Members who are transitioning home should receive a copy of their discharge summary and care plan at the time of discharge. A copy should be sent to the primary care physician (PCP) **within one business day**.

4. Highmark expects all network practicing providers to receive and attest to MOC training annually. If there is a trend of continued non-attestation, those providers found to be non-compliant with the Model of Care may be targeted for potential clinical review. For those non-compliant providers, individual results such as, but not limited to, utilization patterns, hospital admissions, readmissions and HEDIS performance outcomes may be reviewed. If there are issues identified, a Corrective Action Plan may be requested.
5. Highmark conducts medical record reviews at least annually and expect all network providers to respond to record requests timely. Reviews are conducted on PCPs, Specialty Care Practitioners, Behavioral Health Practitioners, and Ancillary providers. Results from the review are communicated to providers and include opportunities for improvement and education as needed.
6. Highmark D-SNP encourages providers to participate in Interdisciplinary Care Team (ICT) meetings. As a provider, you are an important part of the member's ICT. The ICT members conduct a clinical analysis of the member's identified level of risk, needs, and barriers to care to develop an Individualized Care Plan (ICP), which will be reviewed with the member. The ICT analyzes, modifies, updates, and discusses new ICP information with the member and providers as a team, when appropriate. Providers can request an ICT meeting for their members by calling 1-800-685-5209 (TTY: 711).
7. Highmark D-SNP expects providers to stay up to date by visiting our website and communicating by utilizing the Provider Portal, as these are the easiest ways for providers to receive information and updates. The following are important communications that can be found on our website:
  - Provider E-newsletters are updated monthly and highlight information regarding any new clinical programs or updates.
  - Provider manuals are updated annually and reviewed during annual trainings. Current manuals are also available on the provider section of our website.
8. The following are functionalities available via the Provider Portal:
  - Automated ICT communications
    - Care Plans generated or updated by the ICT
    - Discharge reports
    - Quarterly Performance dashboards that show gaps in care and chronic conditions
  - Secure messaging is also available to have open dialog between providers and internal staff who part of the members' ICT.
9. Highmark expects provider directories to be continuously updated such as changes to the office address, phone numbers, office hours, hospital affiliations, and acceptance of new patients.

**Common MOC Terms and Definitions:**

Members may ask you about the following information that is routinely discussed with their case manager.

**Health Risk Assessment (HRA) Survey:** Highmark uses the HRA to provide each Medicare member a means to assess their health status and needs as well as priorities to improve their health by promoting positive behaviors. The HRA is also used by the case managers to provide an assessment of risk that can generate referrals for clinical programs. Newly enrolled members identified by the Centers for Medicare and Medicaid Services (CMS) on a monthly enrollment file are requested to complete an initial HRA within ninety (90) days of their effective date as required by CMS Model of Care standards. Existing members are required to complete an HRA within 12 months of the last completed HRA or the member's enrollment date if there is no completed HRA on record.

**Individualized Care Plan (ICP):** Highmark D-SNP utilizes the information collected from the HRA as well as other available clinical data, such as claims and encounters, to create a care plan that is individualized to each member's needs and priorities. The ICP will be created in conjunction with the member and/or caregiver to ensure it includes consideration of the member's personal care preferences, self-management goals and objectives. At a minimum, a completed ICP will contain:

- Services and interventions specifically tailored to the member's Health-related social needs (HRSN) and Social Determinants of Health (SDoH) needs
- Documentation of the member's personal healthcare preferences (as appropriate)
- Member self-management goals and objectives (as appropriate)
- Clearly defined goals with measurable outcomes
- Progress and action toward the goals
- Whether the goals have been "met" or "not met"
- Appropriate alternative actions if "not met"

**Interdisciplinary Care Team (ICT):** Member care routinely demands a combination of efforts from physicians of various disciplines, registered nurses, and licensed social workers, as well as other pertinent skilled health care professionals and paraprofessionals. Comprehensive patient care planning involves coordination, collaboration and communication between this ICT and the member. Highmark's D-SNP Provider Portal should be utilized frequently for any communications regarding members, their ICP, or ICT.

**Other Important Information about Our Model of Care**

All Members have an assigned Care Manager. If you need to reach them about care plans, request additional support for your member, or schedule a formal ICT meeting, Case Management can be reached at the following number: 1-800-685-5209 (TTY: 711).

Specific questions regarding the Model of Care Plan should be addressed with your Highmark Provider Representative.

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**\*Action Required** – Please go to

<https://providers.highmark.com/wholecare/resource-centers/medicare-resources/model-of-care>

Fill out the provider information at the bottom of the page after reviewing the MOC training. Click agree to acknowledge you have reviewed and understand Highmark Wholecare's Model of Care Information and submit your attestation.

## **PREVENTIVE HEALTH, DISEASE AND CASE MANAGEMENT**

### **Preventive Health Program**

The Highmark Wholecare Preventive Health Program focuses on the importance of health screening and early detection of diseases. Key interventions of the program include:

- Reminders for Preventive Health screenings
- Telephonic outreach to assist members in scheduling mammograms when indicated
- Physician notification of members overdue for mammograms and/or pap smears
- In-home colorectal screening kits available to members
- Member newsletters with articles focusing on the importance of Preventive Health
- Health screening information on the Highmark Wholecare website

### **Disease Management Programs**

Highmark Wholecare's Disease Management Programs use a multidisciplinary approach that identifies health conditions within our population. These programs focus on identifying the needs of the population within these chronic conditions and perform scheduled outreach activities to provide education, resources, and care coordination to members.

The program focuses on providing disease management for the following conditions:

- Congestive Heart Failure (CHF)
- Chronic Obstructive Pulmonary Disorder (COPD)
- Chronic Kidney Disease (CKD)
- Inflammatory Bowel Disease (IBD)
- Diabetes
- Prediabetes, Hypertension, Hyperlipidemia
- Behavioral Health

Condition management for members supports the provider-member relationship and plan of care to emphasize the prevention of exacerbations and complications that require emergency room and inpatient healthcare services.

### **Case Management**

#### **General Information**

The goal of the Case Management is to intervene in medically or socially complex cases that may benefit from increased coordination of services to optimize health and prevent disease. The Case Management Team in the Clinical Operations Department is staffed by licensed nurses and social workers with diverse professional backgrounds including maternity, special needs pediatrics, medical/surgical, HIV/AIDS, substance misuse, mental health, wellness and physical rehabilitation.

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A Case Manager is available Monday through Friday from 8:30 AM to 4:30 PM to assist with coordination of the members' healthcare needs. When calling after hours or on holidays, please refer to the Quick Reference section in this manual for the Member Services phone number.

Case management is a creative and collaborative process involving skills such as assessment, planning, coordination and advocacy. Case management facilitates optimal patient outcomes. Early intervention is essential to maximize treatment options while minimizing potential complications associated with catastrophic illnesses or injury and exacerbation of chronic conditions. The case management process includes:

- Assessment
- Planning
- Intervention
- Quality Monitoring
- Evaluation/Reassessment

The responsibilities of case management include:

- Liaison with various healthcare practitioners, community social service agencies, advocacy groups and other agencies that the Highmark Wholecare Medicare Assured population may interface with.
- Case management of members with serious and complex needs.
- Coordination of services between primary care, specialty, ancillary, and behavioral health practitioners within and outside the network.
- Facilitation of members' access to city, county and state and social agencies for those members with complicated ongoing social service needs that affect their ability to access and use medical services.
- Transitions from hospital to home.

### **Criteria for Referrals to Case Management**

The following problems and/or diagnoses are examples of appropriate referrals to the Case Management services:

- Adults with Serious and Complex Medical Needs
- Mental Health or Substance Misuse Issues
- Social Detriments of Health concerns (social isolation, food insecurity, housing, transportation, domestic violence)

### **Transitions from Hospital to Home**

Seeing a patient in the office following an admission can be a challenging experience for both your office and the patient. Highmark Wholecare is dedicated to making that transition less confusing for you and your patients. The initial contact with members is attempted while they are still in the acute care setting and the interventions are focused in six areas:

- Medication Reconciliation
- Making and Keeping Follow-Up Appointments
- Assessing and Arranging Home Health Care Needs
- Assessing and Coordination Durable Medical Equipment Needs

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- Discussing Transportation Options and Resources to Appointments
- Coordination to have Gaps in Care and Preventive Screening Needs Addressed

Our Team works with members related to these activities:

- Keeping the discharge instructions and bringing them to the appointment
- Understanding and adhering to their medications, both dosing and frequency
- Keeping a current list of all medicines and sharing that with the physician and members of their care team.
- Making and keeping follow up appointments with PCP and Specialists
- Making sure there is transportation to appointments. We can make referrals to transportation programs, if needed.

If you have a patient that you feel would benefit from coordination during a transition, please contact the Clinical Operations Department.

**MOM Matters Maternity**

MOM (Maternity Outreach and Management) Matters, offers maternity care coordination to improve the frequency and timeliness of prenatal and postpartum care; to reduce the incidence of low birth weight and pre-term deliveries; and to decrease the need for NICU admissions. This is population-based, directed toward improving outcomes for all pregnant members. Specific interventions are designed to identify and prospectively intervene with members at high risk for adverse pregnancy outcomes. All Highmark Wholecare members identified as pregnant are eligible, and members are automatically enrolled once they are identified as being pregnant. MOM Matters supports the practitioner-patient relationship and plan of care and emphasizes the prevention of complications by using evidence-based guidelines and empowerment strategies. Participation is voluntary, and members can opt out at any time. To stop participating, they only need to call. Providers can refer patients by calling us.

By participating members can receive the following support:

- Education and self-management tools
- Understand signs and symptoms of preterm labor or complications with the pregnancy
- Lifestyle modifications to maintain a healthy pregnancy
- Recognize how co-existing medical conditions can impact the pregnancy
- Information on smoking cessation with a referral to the state Quitline
- Member newsletter with pregnancy related articles
- Understand the importance of post-partum follow-up

## **INTRODUCTION TO CREDENTIALING**

### **Who is Credentialed?**

Practitioners: Medical Doctor (MD), Doctor of Osteopathy (DO), Doctor of Podiatric Medicine (DPM), Doctor of Chiropractic (DC), Doctor of Dental Medicine (DMD), Doctor of Dental Surgery (DDS), Doctor of Optometry (OD), master's level and Doctorate of Psychology (Ph.D.), Doctorate of Philosophy (Ph.D.), Licensed Professional Counselors (LPC), Licensed Marriage and Family Therapists (LMFT), and Clinical Social Workers and other medical practitioners and behavioral healthcare specialists as deemed appropriate. (This listing is subject to change.)

Extenders: Physician Assistant (PA), a Certified Nurse Midwife (CNM), a Certified Registered Nurse Practitioner (CRNP), Master level Clinical Nurse Specialist (CNS) and a Certified Nurse Practitioner (CNP). (This listing is subject to change.)

Facility and Ancillary Service Providers: Hospitals, Nursing Homes, Skilled Nursing Facilities, Home Health, Hospice, Rehabilitation Facilities, Ambulatory Surgical Centers, Portable X-ray Suppliers, End Stage Renal Disease Facilities, Clinical Laboratories, Outpatient Physical Therapy and Speech Therapy providers, FQHCs, Rural Health Clinics (RHC) and Facilities providing mental health and substance misuse services. (This listing is subject to change.)

### **Purpose of Credentialing**

Credentialing is the process of performing a background investigation, as well as validation of a practitioner and provider's credentials and qualifications. The credentialing and recredentialing processes also encompass a complete review of, but not limited to, malpractice histories, quality of care concerns and licensure status. Our company prides itself on the integrity and quality of the composition of the practitioner and provider networks.

### **Credentialing Standards**

Highmark Wholecare has established credentialing and recredentialing policies and procedures that meet CMS, DOH, DHS, and NCQA standards. Highmark Wholecare adherences to the Principles of Ethics of the American Medical Association, the American Osteopathic Association or any appropriate professional organization involved in a multidisciplinary approach.

All information must be current and up to date to begin the credentialing process. Therefore, it is important to provide us with your CAQH ID on a completed Provider Data Form and submit all attachments in a timely manner with the most current information available. We will obtain your most current application through the CAQH database.

In addition, extenders are required to submit a copy of their collaborative/written agreement with a Highmark Wholecare participating supervising practitioner. This agreement must adhere by state specific regulations for collaborative/written agreements for extenders. Any time there

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is a change in the extender's supervising physician, the extender will be required to submit a current copy of his/her new collaborative/written agreement as indicated in his/her approval letter.

Where applicable, the submittal of the collaborative/written agreement must include a copy of the letter of approval from the State and if applicable per the collaborative/written agreement, a DEA is required.

Highmark Wholecare standards include, but are not limited to the following:

- A current, unrestricted license.
- Fully completed and attested CAQH application
- National Provider Identifier (NPI) number
- Curriculum Vitae and/or Work History to include month and year
- Copy of current, unencumbered DEA certificate, if applicable
- Acceptable malpractice history as subject to decision by our company's Medical Directors and Legal Counsel
- Unexpired professional liability coverage as mandated by state law, of no less than \$500,000 per occurrence, \$1,500,000 per aggregate and coverage provided by the Medical Care Availability and Reduction of Error Fund (Mcare) or Federal Tort Coverage
- Active participation in the Medicare and/or Medical Assistance Programs; free of sanctions
- Foreign graduates must submit an ECFMG certificate
- Other items as deemed appropriate

The credentialing/recredentialing process involves primary sourced verification of practitioner credentials.

The Credentialing Department will notify practitioners, in writing, within forty-five (45) calendar days of receiving any information obtained during the credentialing or recredentialing process that varies substantially from the information provided by the practitioner. Practitioners have the right to correct erroneous information submitted by another party or to correct his or her own information submitted incorrectly. Applicants have ten (10) calendar days from the date of our company's notification to submit written corrections and supporting documentation to the Credentialing Department. A credentialing decision will not be rendered until the ten (10) calendar days have expired.

Practitioners, upon request, have the right to be informed of the status of their credentialing or recredentialing application, or a copy of the credentialing criteria. Practitioners also have the right to review any information submitted in support of their credentialing applications except for National Practitioner Data Bank (NPDB) and/or Healthcare Integrity Practitioner Data Bank (HIPDB) reports, letters of recommendation, and information that is peer review protected. A practitioner must submit a written request to review their credentialing information. All appropriate credentialing information will be sent by Certified Mail, overnight mail or carrier to the practitioner within ten (10) business days from the date that the Credentialing Department

received the request.

All practitioners must be recredentialed at least every three (3) years in order to continue participation within our company. This helps to ensure continued compliance with National Committee for Quality Assurance (NCQA), Center for Medicare and Medicaid Services (CMS) and the Department of Health (DOH), as well as to uphold the integrity and quality of the networks. Extensions cannot be granted.

We are committed to protecting the confidentiality of all practitioner information obtained by the Credentialing Department as outlined in our Confidentiality of Practitioner/ Provider Credentialing Information Policy and Procedure.

### **Ongoing and Performance Monitoring**

Our company's Credentialing Department conducts ongoing monitoring of sanctions, licensure disciplinary actions and member complaints.

Sanction information is reviewed by utilizing the Office of Inspector General's (OIG) report, the Medicare Opt-out Listing (CMS), CMS Preclusion Listing, and applicable state disciplinary reports. Information can also be obtained from the American Medical Association (AMA) and the National Provider Data Bank (NPDB)/Healthcare Integrity Practitioner Data Bank (HIPDB) as needed.

Monitoring of limitations on licensure is conducted on a monthly basis. If a participating practitioner is found on the OIG, Medicare Opt-Out List, Medicare/Medicaid sanction/exclusion listing or applicable state disciplinary action report, the practitioner's file is immediately pulled for further investigation. Depending on severity level of the sanction, the practitioner may be sent to the Medical Director for review and recommendation, sent to Quality Improvement/Utilization Management Committee for review and decision and/or immediately terminated. In all instances, the information is reported to the QI/UM Committee.

The credentialing department monitors member complaints as part of the recredentialing process on a monthly basis. The credentialing department receives complaint reports, which reveals member complaints filed against practitioners as well as trends in those complaints. If the complaint is deemed viable by the reporting area, it is documented in the reports. Depending upon the severity level of the complaint(s), the practitioner may be sent to the Medical Director for review and recommendation, sent to Quality Improvement/Utilization Management Committee for review and decision and/or terminated and outcome presented to Quality Improvement/Utilization Management Committee.

Our recredentialing process includes a comprehensive review of a practitioner's credentials, as well as a review of any issues that may have been identified through a member complaint report and/or quality of care database.

### **Practitioner Absences**

Highmark Wholecare continues to follow NCQA guidelines for practitioners called to active military service, on maternity leave or an approved sabbatical. However, it is the practitioner's or his/her office's responsibility to notify us in writing that the practitioner is called to active duty or beginning the leave, as well as an expected return date. The letter should also include the practitioner who will be covering during his or her leave. The Credentialing Department will not terminate the practitioner called to active duty, on maternity leave or on an approved sabbatical if appropriate coverage is in place. Practitioner/practitioner's office should notify us of the practitioners return, as soon as possible, but not exceeding ten (10) business days from the practitioners return to the office. The Credentialing Department will determine, based upon the length of time, if the practitioner will have to complete a recredentialing application. If the practitioner requires recredentialing, it must be completed within sixty (60) calendar days of the practitioner resuming practice.

### **Denial and Termination**

In accordance with Highmark Wholecare's business practices, the inclusion of a practitioner in our Provider Network is within the sole discretion of our company.

We conduct credentialing in a non-discriminating manner and do not make credentialing decisions based on an applicant's type of procedures performed, type of patients, or a practitioner's specialty, marital status, race, color, religion, ethnic/national origin, gender, age, sexual orientation, or disability. We understand and abide by the Federal Regulation of the Americans with Disabilities Act whereby no individual with a disability shall on the sole basis of the disability be excluded from participation.

If a practitioner does not meet our baseline credentialing criteria, the QI/UM Committee will make a final determination on participation or continued participation. If a practitioner fails to submit information and/or documentation within requested time frames, processing of the practitioner application may be discontinued or terminated. All requests for recredentialing updates must be completed and returned in a timely manner. Failure to do so could result in denial or termination of participation.

Denial and termination decisions that are made based on quality concerns can be appealed and are handled according to Highmark Wholecare's Due Process Policy and Procedure. If necessary, the information is reported to the National Practitioner Data Bank and Bureau of Quality Management and Provider Integrity in compliance with the current 45 CFR Part 60 and the Health Care Quality Improvement Act, as well as State licensing boards.

Practitioners who want to request a review of a termination, other than for quality-of-care concerns, must submit a written request for the review along with any supporting documentation to us within thirty (30) calendar days of the date of the certified notification.

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**Delegated Credentialing**

Delegation is the formal process by which Highmark Wholecare has given other entities the authority to perform credentialing functions on our behalf. We may delegate certain activities to a credentialing verification organization (CVO), Independent Practitioner Association (IPA), hospital, medical group, or other organizations that employ and/or contract with practitioners. Organizations must demonstrate that there is a credentialing program in place and the ability to maintain a program that continuously meets our program requirements. The delegated entity has authority to conduct specific activities on behalf of our company. We have the ultimate accountability for the quality of work performed and retain the right to approve, suspend, or terminate the practitioners and site. Any further sub-delegation shall occur only with our approval and shall be monitored and reported back to us.

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NaviNet® is a separate company that provides an internet-based application for providers to streamline data exchanges between their offices and Highmark Wholecare such as routine eligibility, benefits and claims status inquiries.

HealthHelp is a separate company that administers prior authorizations for certain services for Highmark Wholecare.

VSP is a separate company that administers the vision benefit(s) for Highmark Wholecare.

United Concordia Dental is a separate company that administers the dental benefit(s) for Highmark Wholecare.

TruHearing is a registered trademark of TruHearing, Inc. TruHearing is a separate company that administers the hearing aid benefit(s) for Highmark Wholecare.

Findhelp is a separate company that gathers community-based organization resources for Highmark Wholecare.

Optum is a separate company that administers E&M audits, education and probe audit expansion for Highmark Wholecare.