

Notice Date: November 22, 2024
To: Common Ground Healthcare Cooperative Providers
From: Common Ground Healthcare Cooperative
Subject: November 2024 Policy Update
Effective Date: January 1, 2025

Summary

At Common Ground Healthcare Cooperative, we listen to our providers, and we streamline our business practices to make it easier for you to work with us. We have worked to create a predictable cycle for releasing administrative, medical, and reimbursement policies, so you know what to expect.

Check back each month for a consolidated network notification of policy updates from Common Ground Healthcare Cooperative.

How to Use This Network Notification

- Reference the list of policy updates.
- Note the effective date and impacted plans for each policy.
- Click the hyperlinked policy title to open the webpage with the full policy.

Find Our Policies Online

To access all CareSource policies, visit **CareSource.com** > Providers > Tools & Resources > [Provider Policies](#). Select your plan and state, then the type of policy. Each policy page has an archive when you find previous versions of policies.

Policies

Policy Name & Number	Policy Type	Plans	Effective Date	Prior Authorization Impacted?
Retrospective Authorization Review AD-1464	Administrative	WI Marketplace	January 1, 2025	Revision



HEALTHCARE COOPERATIVE

ADMINISTRATIVE POLICY STATEMENT	
Wisconsin Marketplace	
Policy Name & Number	Date Effective
Retrospective Authorization Review-WI MP-AD-1464	01/01/2025
Policy Type	
ADMINISTRATIVE	

Administrative Policy Statements are derived from literature based on and supported by clinical guidelines, nationally recognized utilization and technology assessment guidelines, other medical management industry standards, and published MCO clinical policy guidelines. Medically necessary services include, but are not limited to, those health care services or supplies that are proper and necessary for the diagnosis or treatment of disease, illness, or injury and without which the patient can be expected to suffer prolonged, increased, or new morbidity, impairment of function, dysfunction of a body organ or part, or significant pain and discomfort. These services meet the standards of good medical practice in the local area, are the lowest cost alternative, and are not provided mainly for the convenience of the member or provider. Medically necessary services also include those services defined in any Evidence of Coverage or Certificate of Coverage documents, Medical Policy Statements, Provider Manuals, Member Handbooks, and/or other plan policies and procedures.

Administrative Policy Statements do not ensure an authorization or payment of services. Please refer to the plan contract (often referred to as the Evidence of Coverage or Certificate of Coverage) for the service(s) referenced in the Administrative Policy Statement. Except as otherwise required by law, if there is a conflict between the Administrative Policy Statement and the plan contract, then the plan contract will be the controlling document used to make the determination.

According to the rules of Mental Health Parity Addiction Equity Act (MHPAEA), coverage for the diagnosis and treatment of a behavioral health disorder will not be subject to any limitations that are less favorable than the limitations that apply to medical conditions as covered under this policy.

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A. Subject

Retrospective Authorization Review

B. Background

A retrospective review is a request for an initial review for an authorization of care, service, or benefit for which a prior authorization (PA) is required but was not obtained prior to the delivery of the care, service, or benefit. Occasionally, situations arise in which a PA cannot be reasonably obtained prior to care, service, or benefit. In these cases, Common Ground Healthcare Cooperative ("CGHC") will conduct a retrospective review of medical services received by members when the request is received within 90 days of the date of initial denial by the plan, communicated on an explanation of payment to provider.

Retrospective reviews are performed by licensed clinicians who are supported by licensed physicians. A decision is rendered within 30 days of receipt of all necessary documentation. In the event of an adverse determination, the provider and/or member are notified of the decision and supporting rationale and are provided with their appeal rights.

C. Definitions

- **Clinical Review Criteria** – The written screening procedures, decision abstracts, clinical protocols and practice guidelines used by CGHC to determine the medical necessity and appropriateness of health care services.
- **Retrospective Authorization Review** – The process of reviewing and making a coverage decision for a service or procedure that has already been performed (e.g., post service decision).
- **Prior Authorization** – Utilization review conducted prior to an admission or the provision of a health care service or a course of treatment in accordance with CGHC's requirement that the health care service or course of treatment, in whole or in part, be approved prior to provision.

D. Policy

- I. CGHC considers retrospective authorization review appropriate when **ANY** of the following circumstances has occurred:
 - A. A CGHC member is unable to advise the provider of plan enrollment due to a condition that renders the member unresponsive or incapacitated.
 - B. The member is retrospectively enrolled which covers the date of service.
 - C. Urgent service(s) requiring authorization was/were performed, and it would have been to the member's detriment to take the time to request authorization.
 - D. The new service was not known to be needed at the time the original prior authorized service was performed.
 - E. The need for the new service was revealed at the time the original authorized service was performed.

The ADMINISTRATIVE Policy Statement detailed above has received due consideration as defined in the ADMINISTRATIVE Policy Statement Policy and is approved.

- F. The service was directly related to another service for which prior approval has already been obtained and that has already been performed.
- II. All retrospective authorization requests must be submitted within 90 calendar days of the date of initial denial by the plan, communicated on an explanation of payment to provider.
- III. Unless the CGHC member is transitioning and qualifies under the retroactive coverage requirements, retrospective reviews, which are requested greater than 90 days past the date of initial denial by the plan, communicated on an explanation of payment to provider, will be administratively denied.
- IV. In the event of any conflict between this policy and a provider's contract with CGHC, the provider's contract will be the governing document.
- E. Conditions of Coverage
NA
- F. Related Policies/Rules
Medical Necessity Determinations

G. Review/Revision History

DATE		ACTION
Date Issued	09/25/2024	New policy. Approved at Committee.
Date Revised	11/06/2024	Updated retrospective submission timeframe. Approved at Committee.
Date Effective	01/01/2025	
Date Archived		

H. References

1. Common Ground Provider Manual Wisconsin-Marketplace. Accessed July 19, 2024. www.CGHC.com.