

PROVIDER OPERATIONS MANUAL



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USA

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SECTION 1 INTRODUCTION

Welcome to Alignment Healthcare!

We are an innovative, data-driven health care company dedicated to serving Medicare Advantage beneficiaries. We serve the most frail and vulnerable people in our community, because it is our calling. We do this by designing products and services that help improve the quality of life, mobility, and connection. As a result, the people we serve are more independent and know we are there for them.

Based in Orange, California, Alignment Healthcare, on behalf of itself and its affiliates, offers Medicare Advantage plan options through Alignment Health Plan and AHP Affiliates (collectively known throughout this Manual as Alignment or the Health Plan). Alignment operates as a clinically integrated health care delivery system in select markets. Alignment is a Medicare Advantage plan in several counties in California, North Carolina, Nevada, Arizona and will be serving Florida and Texas beginning January 1, 2023, working in diverse communities to promote health and wellness and delivering high-quality care and services to its Medicare Advantage Members.

We offer our network providers a variety of contracts, enabling them to better serve their Medicare and Medicare/Medicaid (Medi-Medi) population.

We are changing health care, one person at a time, and we are excited to accomplish that together.

Purpose of the Provider Operations Manual

The Provider Operations Manual describes Alignment's operational policies, procedures, programs, and services for our Participating Providers (all Providers that provide services to Alignment Members) and their staff. It also contains key contacts, addresses, phone numbers, and websites. Alignment's Provider Operations Manual is an extension of the Participating Provider Services Agreement, the contents of the manual supplement the Participating Provider Services Agreement and their addenda. When the contents of Alignment's Provider Operations Manual conflict with a Participating Provider Services Agreement, the Participating Provider Services Agreement takes precedence.

This Provider Operations Manual applies to all Alignment-contracted Participating Providers. A Participating Provider is an Independent Physician Association (IPA), Medical Group, Primary Care Provider (PCP), specialist, ancillary provider, hospital, supplemental provider, or other health care provider or practitioner who is contracted with Alignment to provide services to our Members.

The Provider Operations Manual, unless otherwise specified, applies to both delegated and non-delegated providers. For purposes here, delegated providers perform certain managed-care functions under their agreement with Alignment, such as utilization management (UM), claims payment, and credentialing (for example, by the IPA). By contrast, Alignment performs those managed-care functions on behalf of nondelegated providers, such as directly contracted physicians, ancillary providers, and hospitals.



Alignment Department Descriptions

Claims

Processes claims for payment to Participating Providers and assists with claims status inquiries. Maintains Participating Provider files and information to ensure proper reimbursement according to contracted rates.

Compliance

Oversees Alignment Healthcare's compliance program to ensure that regulatory requirements are met.

Credentialing

A division of the Quality Management Department and responsible for the review and maintenance of qualifications and other relevant information pertaining to a licensed health care professional or facility in order to participate in the Alignment Healthcare network and prior to seeing Alignment Members.

Delegation Oversight

When delegated, responsible for initial validation of capabilities, processes and procedures and ongoing oversight of the following functions to ensure adherence to Federal and/or State regulations: Claims Processing, Credentialing, Utilization Management and General Case Management.

Eligibility

Processes all Member enrollment and disenrollment and verifies Member eligibility for services for Participating Providers' offices, pharmacies, and vendors.

Finance

Processes, as appropriate, percent-of-premium payments for PCPs and capitation and fee-for-service payments for Alignment's Participating Providers and other medical service vendors.

Marketing

Promotes Alignment within the service-area communities through community events, orientations for new Members, distribution of educational and marketing materials, and participation in community activities geared toward marketing benefits and services.

Member Services

Answers all Member calls regarding benefits inquiries, complaints, replacement ID cards, and grievances and appeals. Assists with scheduling interpreter services and transportation and PCP transfers. Maintains a Member-retention unit to assist Members. Resolves customer service issues. Inquiries, or appeals, about Prescription Drug Coverage are delegated to Alignment and to the Health Plan's Pharmacy Benefits Manager.

Network Management

Negotiates and maintains all contracts for medical services provided to our Members and works with Providers on contract inquiries. Responsible for educating Participating Providers about Alignment and providing access to written provider educational materials, bulletins, newsletters, and reports.



Pharmacy

Administers Medicare Part D Prescription Drug Coverage benefits and offers a comprehensive pharmacy services program, including formulary management, utilization management, and pharmacy network management.

Provider Data Management

Inputs and maintains all Provider data, practice information (e.g., demographics), and applicable contract information.

Quality Management (QM)

Responsible for monitoring, evaluating, and improving the quality and safety of clinical care and quality of service provided to Alignment Members and monitors whether the delivery and utilization of services meets professional and evidence-based standards of care and practice. QM oversees quality activities, quality improvement projects, and audits to ensure compliance with the Centers for Medicare & Medicaid Services (CMS) guidelines.

Risk Adjustment

Ensures that complete and accurate diagnosis data is gathered through coding of documented services provided to our Members. The goal of Risk Adjustment is to accurately reflect the disease burden of the membership so that payments to the health plan by CMS are consistent with expected health care expenditures.

Sales

Schedules and conducts presentations in the community to ensure that potential Members understand Alignment benefits and the enrollment process. Sales representatives interact with PCP offices and their staff, specifically related to enrollment and retention. Coordinates all sales events and develops collaterals and other printed materials.

Stars Performance Improvement

Establishes guidelines for achieving an overall Five-Star quality rating from the Centers for Medicare & Medicaid Services (CMS) through high-quality care. Monitors and helps physicians improve their individual Stars ratings. Members with chronic diseases are monitored, ensuring best outcomes and best practices in treating their diseases. CMS has given ratings to health plans based on how well health plans provide clinical quality, customer services, and satisfaction to their Membership.

Utilization Management (UM)

Ensures that all medical services are provided appropriately in the correct settings and that all medical services are referred to Participating Providers, unless otherwise agreed upon by Alignment. Evaluates referrals based on appropriateness and medical need of health care services, according to evidence-based criteria or guidelines.

Alignment Department and Participating Provider List

To contact Alignment departments, Participating Providers should refer to [Exhibit 1: Key Contact Information](#).



EXHIBIT 1

KEY CONTACT INFORMATION

GENERAL RESOURCES	
Alignment Healthcare	https://www.alignmenthealthcare.com
Providers <ul style="list-style-type: none"> • Provider Operations Manual • Stars Best Practice Guide • Prior Authorization for Nondelegated Providers 	https://www.alignmenthealthcare.com/Partners/Providers
Provider Special Needs Plan Model of Care Training	https://www.alignmenthealthplan.com/providers/special-needs-plan-training
AVA® Login	https://ava.alignmenthealthcare.com Register for AVA® at https://www.alignmenthealthplan.com/providers
Office Ally™	info@officeally.com 360-975-7000 (Option 1)
SFTP Login	https://sftpahcusa.com
Alignment Health Plan	https://www.alignmenthealthplan.com
Providers <ul style="list-style-type: none"> • Provider Login • Provider Newsletter • Provider Resource Guide 	https://www.alignmenthealthplan.com/providers
Provider Newsletter	https://www.alignmenthealthplan.com/providers/newsletter
FirstMedicare Direct	https://firstmedicare.com
ACCESS ON-DEMAND CONCIERGE	
Phone 24/7	1-833-AHC-ACCESS 1-833-242-2223 (TTY 711)
ALIGNMENT HEALTHCARE CENTERS	
California	https://www.alignmenthealthcare.com/Locations/California
North Carolina	https://www.alignmenthealthcare.com/Locations/North-Carolina
CARE ANYWHERE	
Email	careanywherecoordination@ahcusa.com
Phone	833-902-1665
CLAIMS	
Website	Login to AVA® to check claims statuses and to submit inquiries. For more information or to request access to AVA go to https://www.alignmenthealthplan.com/providers
Phone 8 am-5 pm PST, Mon-Fri	866-646-2247
Claims Status Interactive Voice Response (IVR) System (Ariz., Calif., Nev., N.C.)	844-361-4712
Mailing Address for Claims	Alignment Healthcare Attn: Claims Department P.O. Box 14010 Orange, CA 92863-9936



Mailing Address for Payment Disputes

Alignment Healthcare
Attn: Provider Appeals & Disputes
P.O. Box 14010
Orange, CA 92863-9936

UB-1450 (Institutional)

https://www.cms.gov/medicare/billing/electronicbillingeditrans/15_1450.html

CMS-1500

https://www.cms.gov/medicare/billing/electronicbillingeditrans/16_1500.html

**COMPLIANCE****Alignment Healthcare**

Email	compliance@ahcusa.com
Web: Anonymous Reporting	www.alignmenthealth.ethicspoint.com
Phone: Anonymous Reporting 24/7	844-297-5948
Phone: Chief Compliance Officer / HIPAA Privacy Officer	657-383-5394

FirstMedicare Direct

Phone: Anonymous Reporting 24/7	855-367-8184
Email	FCCcompliance@firstcarolinacare.com

CREDENTIALING

Phone 8 am-5 pm PST, Mon-Fri	844-227-7599
Fax	855-903-5155
Mailing	Alignment Healthcare Attn: Credentialing Department 1100 W. Town and Country Road, Suite 1600 Orange, CA 92868

DELEGATION OVERSIGHT

Website	Login to AVA® to upload reports, see instructions, and download templates. For more information or to request access to AVA® go to https://www.alignmenthealthplan.com/providers
Email	Yvonne (Bonnie) Martinez, Director of Delegation Oversight: ymartinez@ahcusa.com Amy Gonzalez, Project Manager of Delegation Oversight: agonzalez@ahcusa.com
Phone	Yvonne (Bonnie) Martinez: 909-217-5199 Amy Gonzalez: 657-218-7735, ext. 7135

ELECTRONIC FUND TRANSFER (EFT) & ELECTRONIC EXPLANATION OF BENEFITS (EOB)

Website	https://www.payspanhealth.com/nps/support/index
Email	providersupport@payspanhealth.com
Phone: Payspan®	877-331-7154

ELECTRONIC DATA INTERCHANGE (EDI) – ALIGNMENT HEALTH PLAN ONLY

Email	ahcedi_support@ahcusa.com
Phone 8 am-5 pm PST, Mon-Fri	844-286-2855

**ELIGIBILITY****Alignment Health Plan**

Website	Login to AVA® to verify member eligibility, check and download plan benefits (pdfs), and to submit inquiries. For more information or to request access to AVA go to https://www.alignmenthealthplan.com/providers
Email	eligibilitygroup@ahcusa.com
Phone 8 am-5 pm PST, Mon-Fri	888-517-2247

FirstMedicare Direct

Phone	844-499-5630
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**FINANCE / CAPITATION**

Email	financialplanning@ahcusa.com
Phone: Capitation and Externally Audited Financial Statements	323-728-7232, ext. 2122

JUMP-START SCHEDULING

Phone	844-215-2443
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MEMBER SERVICES**Alignment Health Plan**

Phone 8 am-8 pm, seven days a week (except Thanksgiving and Christmas) from Oct. 1 - March 31, and Mon-Fri (except holidays) from April 1 - Sept. 30	English: 866-634-2247 (TTY 711) Spanish: 877-399-2247 (TTY 711)
Address	Alignment Health Plan Attn: Member Services Department 1100 W. Town and Country Road, Suite 300 Orange, CA 92868

FirstMedicare Direct

Phone 8 am-8 pm, seven days a week (except Thanksgiving and Christmas) from Oct. 1 - March 31, and Mon-Fri (except holidays) from April 1 - Sept. 30	844-499-5630 (TTY 711)
Address	FirstMedicare Direct Attn: Member Services Department 42 Memorial Drive Pinehurst, NC 28374

NETWORK MANAGEMENT / PROVIDER RELATIONS

Email: Direct Network Provider Changes/Updates	providerrelations@ahcusa.com
Email: Delegated Network Provider Changes/Updates	provdata@ahcusa.com
Email: General Inquiries	providerrelations@ahcusa.com
Phone 8 am-5 pm PST, Mon-Fri	844-361-4712

PHARMACY**Alignment Health Plan**

Phone: Pharmacy Technical Help Desk 24/7	844-227-7615 (TTY 711)
Phone: Member Pharmacy Help 24/7	844-227-7616 (TTY 711)
Formulary and Part D Resources	https://www.alignmenthealthplan.com/members/medicare-part-d

FirstMedicare Direct

Phone: Prior Approval	844-499-5630
Phone: Mail Order	800-763-0044
Formulary and Part D Resources	https://www.firstcarolinacare.com/medicare/pharmacy



QUALITY MANAGEMENT	
Email	QI@ahcusa.com
Fax	562-207-4617
Phone:	833-649-2303
Mailing	Alignment Healthcare Attn: Quality Management Department 1100 W. Town and Country Road, Suite 1600 Orange, CA 92868
RISK ADJUSTMENT	
Email: HCC Coding	hcc@ahcusa.com
Email: Documentation/ Coding Module	coding@ahcusa.com
Phone: Documentation/ Coding Module	844-499-5633
SALES & MARKETING	
Phone 8 am - 8 pm, seven days a week (except Thanksgiving and Christmas) from Oct. 1 - March 31, and Mon-Fri (except holidays) from April 1 - Sept. 30	888-979-2247 (TTY 711)
Email: Sales	partnerexperience@ahcusa.com
Email: Marketing	marketing@ahcusa.com
STARS	
Email	stars@ahcusa.com
TRANSPORTATION	
Phone: American Logistics	866-327-2247
UTILIZATION MANAGEMENT	
Website	Login to AVA® to submit prior-authorizations, check statuses on existing authorizations and to submit inquiries. For more information or to request access to AVA go to https://www.alignmenthealthplan.com/providers
Phone: General 8 am - 5 pm PST, Mon - Fri	844-310-2247
Prior Authorization	
Email: Pre-service	umdept@ahcusa.com
Phone: Arizona, California, Nevada 8 am - 5 pm PST, Mon - Fri North Carolina 8 am - 5 pm EST, Mon - Fri	844-310-2247
Fax: All States Prior Authorization	562-207-4628
Admissions	
Email: Admission Notifications	inpatientteam@ahcusa.com
Phone: All Admissions Notifications	844-361-4715
Fax: Arizona and Texas Admissions Notifications	480-681-7129
Fax: California Admissions Notifications	562-207-4632
Fax: Nevada Admissions Notifications	702-945-0317
Fax: North Carolina Admissions Notifications	844-227-7596



SECTION 2 PRODUCT OVERVIEW

Below is a high-level summary of Medicare Advantage plan types.

Health Maintenance Organization (HMO)

HMO is a type of Medicare Advantage plan comprised of a network of contracted medical providers and affiliated health facilities through which Member care is coordinated. Most services require a referral and/or authorization prior to obtaining care. Apart from emergency or urgently needed services or out-of-area dialysis, out-of-network care is not covered. Members may be responsible for paying the full cost of care if utilizing unauthorized out-of-network care.

HMO with Point-of-Service Option (HMO POS)

HMO POS plans function similar to HMO plans but offer some out-of-network coverage for certain services. Flexibility to receive out-of-network services, may cost more to the Member than if furnished in-network.

Preferred Provider Organization (PPO)

PPO plans contract with medical providers to create a network of participating providers. Members can receive in-network care through participating providers at a lower cost but have the flexibility to seek out-of-network care for core services at a higher cost. Referrals are not required for most services. Prior authorization may be required for some services.

Chronic Special Needs Plan (C-SNP)

C-SNP is a type of Medicare Advantage plan that provides more focused health care and benefits for Members with specific chronic illness and offers enrollment to Members that meet specific requirements for the qualifying chronic conditions.

Dual-Eligible Special Needs Plans (D-SNP)

D-SNP is a type of Medicare Advantage plan that provides more focused health care and additional benefits for Members that are entitled to both Medicare and medical assistance from a state plan under Medicaid. States may aid in Medicare costs, depending on the state and the Member's eligibility status. In all states except Florida, Alignment and its providers provide the Medicare Services set forth in a Member's benefit plan and will coordinate with an applicable state or payer who arranges for the Member's Medicaid benefit.

For Florida Only: Alignment and its providers provide both the Medicare and Medicaid Services set forth in a Member's benefit plan. Florida providers can find more information on the Medicaid Services in Florida at https://ahca.myflorida.com/medicaid/review/specific_policy.shtml. Providers should also consult the Member's EOC for the specific services a Member is entitled to.

Employee Group Waiver Plan (EGWP)

EGWP is a type of Medicare Advantage plan offered by certain employers to employees and retirees of companies, unions, or government agencies. The plans are tailored to meet each employer's specification for its eligible employer group.



EXHIBIT 2.1 ALIGNMENT HEALTH PLAN 2023 PRODUCT OFFERINGS

State	Product Name	Plan Service Area(s)	How do Members access Physicians and Health Care Professionals?	Does a Primary Care Physician have to make a referral to a Specialist?
AZ	Heart & Diabetes (HMO C-SNP)	Maricopa, Pima, Santa Cruz	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers.	Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services.
	the ONE (HMO)/ el ÚNICO (HMO)		Members are required to see their assigned PCP to coordinate their care.	
	Retiree Options (HMO)	Maricopa, Pima	HMO Members choose a PCP from the network of Participating Providers. Members are required to see their assigned PCP to coordinate their care.	Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services.
	AVA (PPO)	Maricopa, Pima, Santa Cruz	PPO members do not have to choose a network PCP, however a PCP selection is strongly encouraged to help coordinate care. PPO Members can see any in-network provider without a referral. PPO Members can elect to use out-of-network providers but may be subjected to higher copays or co-insurance	No - Referrals are not required to see a specialist for PPO Members. Prior authorization may be required for certain types of tests or services received in-network. Please refer to Evidence of Coverage for the list of services that require prior authorization. Prior authorization is not required for covered services received out-of-network; however, if Alignment later determines that the services received were not covered or were not medically necessary, Alignment may deny coverage.
	Retiree Options (PPO)	Maricopa, Pima	PPO members do not have to choose a network Primary Care Physician (PCP), however a PCP selection is strongly encouraged to help coordinate care. PPO members can see any in-network provider without a referral. PPO Members can elect to use out-of-network providers but may be subjected to higher copays or co-insurance.	No - Referrals are not required to see a specialist for PPO Members. Prior authorization may be required for certain types of tests or services received in-network. Please refer to Evidence of Coverage (EOC) for the list of services that require prior authorization. Prior authorization is not required for covered services received out-of-network; however, if Alignment later determines that the services received were not covered or were not medically necessary, Alignment may deny coverage.



State	Product Name	Plan Service Area(s)	How do Members access Physicians and Health Care Professionals?	Does a Primary Care Physician have to make a referral to a Specialist?
CA	AllCare Preferred (HMO)	Stanislaus	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers. Members are required to see their assigned PCP to coordinate their care.	Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to AllCare for review and determination. Failure to obtain prior authorization may result in nonpayment of services.
	AVA (HMO-POS)	Los Angeles, Orange, San Diego, San Luis Obispo, Santa Clara, Ventura, Stanislaus	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers.	No - Referrals are not required to see a specialist. Prior authorization may be required for certain types of tests or services received in-network. Please refer to Evidence of Coverage for the list of services that require prior authorization. Prior authorization is required for covered services received out-of-network.
	AVA (PPO)	Los Angeles, Orange, San Diego, Ventura	PPO members do not have to choose a network Primary Care Physician (PCP), however, a PCP selection is strongly encouraged to help coordinate care. PPO members can see any in-network provider without a referral. PPO Members can elect to use out-of-network providers but may be subjected to higher copays or co-insurance.	No - Referrals are not required to see a specialist for PPO Members. Prior authorization may be required for certain types of tests or services received in-network. Please refer to Evidence of Coverage for the list of services that require prior authorization. Prior authorization is not required for covered services received out-of-network; however, if Alignment later determines that the services received were not covered or were not medically necessary, Alignment may deny coverage.
	Balance (PPO)	San Joaquin, Stanislaus, Santa Clara	PPO members do not have to choose a network Primary Care Physician (PCP), however, a PCP selection is strongly encouraged to help coordinate care. PPO members can see any in-network provider without a referral. PPO Members can elect to use out-of-network providers but may be subjected to higher copays or co-insurance.	No - Referrals are not required to see a specialist for PPO Members. Prior authorization may be required for certain types of tests or services received in-network. Please refer to Evidence of Coverage for the list of services that require prior authorization. Prior authorization is not required for covered services received out-of-network; however, if Alignment later determines that the services received were not covered or were not medically necessary, Alignment may deny coverage.



State	Product Name	Plan Service Area(s)	How do Members access Physicians and Health Care Professionals?	Does a Primary Care Physician have to make a referral to a Specialist?
CA	CalPlus + Veterans (HMO)	Alameda, Los Angeles, Fresno, Madera, Marin, Orange, Placer, Riverside, San Bernardino, San Diego, Sacramento, San Francisco, San Joaquin, San Luis Obispo, Santa Clara, Stanislaus, Ventura, Yolo	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers. Members are required to see their assigned PCP to coordinate their care.	Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services. *For Members with an assigned PCP that is part of "Alignment Health Plan Network," referrals are not required to see a specialist.
	CalPlusDuals (HMO D-SNP)	Marin, San Francisco, San Joaquin, San Luis Obispo, Stanislaus, Ventura	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers. Members are required to see their assigned PCP to coordinate their care.	Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services.
	ESRD Balance (HMO C-SNP)	Los Angeles, Orange,	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers. Members are required to see their assigned PCP to coordinate their care.	Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services.
	Harmony (HMO)	Alameda, Los Angeles, Orange, San Diego, San Francisco, Santa Clara	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers. Members are required to see their assigned PCP to coordinate their care.	Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services.
	Heart & Diabetes (HMO C-SNP)	Alameda, Los Angeles, Fresno, Madera, Marin, Orange, Riverside, San Bernardino, San Diego, San Francisco, Stanislaus, San Joaquin, San Luis Obispo, Santa Clara, Ventura	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers. Members are required to see their assigned PCP to coordinate their care.	Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services.



State	Product Name	Plan Service Area(s)	How do Members access Physicians and Health Care Professionals?	Does a Primary Care Physician have to make a referral to a Specialist?
CA	My Choice (HMO)	Los Angeles, Orange, Riverside, San Bernardino, San Luis Obispo, Ventura	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers. Members are required to see their assigned PCP to coordinate their care	Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's assigned Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services. *For members with an assigned PCP that is part of "Alignment Health Plan Network," referrals are not required to see a specialist.
	My Choice (PPO)	Placer, Sacramento, San Joaquin, San Mateo, Santa Cruz, Sonoma, Stanislaus, Yolo	PPO members do not have to choose a network Primary Care Physician (PCP), however a PCP selection is strongly encouraged to help coordinate care. PPO Members can see any in-network provider without a referral. PPO Members can elect to use out-of-network providers but may be subjected to higher copays or co-insurance.	No - Referrals are not required to see a specialist for PPO Members. Prior authorization may be required for certain types of tests or services received in-network. Please refer to Evidence of Coverage for the list of services that require prior authorization. Prior authorization is not required for covered services received out-of-network; however, if Alignment later determines that the services received were not covered or were not medically necessary, Alignment may deny coverage.
	My Choice CalPlus (HMO)	Alameda, Los Angeles, Orange, Placer, Riverside, Sacramento, San Bernardino, San Diego, San Joaquin, San Francisco, Santa Clara, Stanislaus, Yolo	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers. Members are required to see their assigned PCP to coordinate their care.	Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services. *For Members with an assigned PCP that is part of "Alignment Health Plan Network" referrals are not required to see a specialist.
	Platinum (HMO)	Los Angeles, Marin, Orange, San Bernardino, San Diego, Riverside	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers. Members are required to see their assigned PCP to coordinate their care.	Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services. *For Members with an assigned PCP that is part of "Alignment Health Plan Network," referrals are not required to see a specialist.



State	Product Name	Plan Service Area(s)	How do Members access Physicians and Health Care Professionals?	Does a Primary Care Physician have to make a referral to a Specialist?
CA	PPO powered by Hoag	Orange	<p>PPO members do not have to choose a network Primary Care Physician (PCP), however a PCP selection is strongly encouraged to help coordinate care.</p> <p>PPO Members can see any in-network provider without a referral.</p> <p>PPO Members can elect to use out-of-network providers but may be subjected to higher copays or co-insurance.</p>	<p>No – Referrals are not required to see a specialist for PPO Members.</p> <p>Prior authorization may be required for certain types of tests or services received in-network. Please refer to Evidence of Coverage for the list of services that require prior authorization.</p> <p>Prior authorization is not required for covered services received out-of-network, however, if Alignment later determines that the services were not covered or were not medically necessary, Alignment may deny coverage</p>
	Retiree Options (HMO)	Los Angeles, Marin, Orange, Placer, Riverside, Sacramento, San Bernardino, San Diego, San Francisco, San Joaquin, San Luis Obispo, San Mateo, Santa Clara, Santa Cruz, Sonoma, Stanislaus, Ventura, Yolo	<p>HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers.</p> <p>Members are required to see their assigned PCP to coordinate their care.</p>	<p>Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's assigned Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services.</p>
	Retiree Options Complete (HMO)	Los Angeles, Marin, Orange, Placer, Riverside, Sacramento, San Bernardino, San Diego, San Francisco, San Joaquin, San Luis Obispo, San Mateo, Santa Clara, Santa Cruz, Sonoma, Stanislaus, Ventura, Yolo	<p>HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers.</p> <p>Members are required to see their assigned PCP to coordinate their care</p>	<p>Yes – Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's assigned Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services.</p>



State	Product Name	Plan Service Area(s)	How do Members access Physicians and Health Care Professionals?	Does a Primary Care Physician have to make a referral to a Specialist?
CA	Retiree Options (PPO)	Los Angeles, Marin, Orange, Placer, Riverside, Sacramento, San Bernardino, San Diego, San Francisco, San Joaquin, San Luis Obispo, San Mateo, Santa Clara, Santa Cruz, Sonoma, Stanislaus, Ventura, Yolo	<p>PPO members do not have to choose a network Primary Care Physician (PCP), however a PCP selection is strongly encouraged to help coordinate care.</p> <p>PPO Members can see any in-network provider without a referral.</p> <p>PPO Members can elect to use out-of-network providers but may be subjected to higher copays or co-insurance.</p>	<p>No – Referrals are not required to see a specialist for PPO Members.</p> <p>Prior authorization may be required for certain types of tests or services received in-network. Please refer to Evidence of Coverage for the list of services that require prior authorization.</p> <p>Prior authorization is not required for covered services received out-of-network; however, if Alignment later determines that the services received were not covered or were not medically necessary, Alignment may deny coverage.</p>
	Retiree Options Complete (PPO)	Los Angeles, Marin, Orange, Placer, Riverside, Sacramento, San Bernardino, San Diego, San Francisco, San Joaquin, San Luis Obispo, San Mateo, Santa Clara, Santa Cruz, Sonoma, Stanislaus, Ventura, Yolo	<p>PPO Members do not have to choose a network Primary Care Physician (PCP), however a PCP selection is strongly encouraged to help coordinate care.</p> <p>PPO Members can see any in-network provider without a referral.</p> <p>PPO Members can elect to use out-of-network providers but may be subjected to higher copays or co-insurance.</p>	<p>No – Referrals are not required to see a specialist for PPO Members.</p> <p>Prior authorization may be required for certain types of tests or services received in-network. Please refer to Evidence of Coverage for the list of services that require prior authorization.</p> <p>Prior authorization is not required for covered services received out-of-network; however, if Alignment later determines that the services received were not covered or were not medically necessary, Alignment may deny coverage.</p>



State	Product Name	Plan Service Area(s)	How do Members access Physicians and Health Care Professionals?	Does a Primary Care Physician have to make a referral to a Specialist?
CA	Select (HMO)	San Diego	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers. Members are required to see their assigned PCP to coordinate their care.	Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services.
	smartHMO (HMO)	Los Angeles, Orange, Riverside, San Bernardino, San Diego	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers. Members are required to see their assigned PCP to coordinate their care.	Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services. *For members with an assigned PCP that is part of "Alignment Health Plan Network," referrals are not required to see a specialist.
	Sutter Advantage (HMO)	Placer, Sacramento, San Francisco, San Mateo, Santa Clara, Santa Cruz, Sonoma, Yolo	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers. Members are required to see their assigned PCP to coordinate their care.	Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to Sutter for review and determination. Failure to obtain prior authorization may result in nonpayment of services.
	the ONE + Rite Aid (HMO)/el ÚNICO + Rite Aid (HMO)	Los Angeles, Orange, Riverside, San Bernardino, San Diego, Santa Clara	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers. Members are required to see their assigned PCP to coordinate their care.	Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's assigned Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services. *For members with an assigned PCP that is part of "Alignment Health Plan Network," referrals are not required to see a specialist.
	the ONE (HMO)/el ÚNICO (HMO)	Fresno, Madera	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers. Members are required to see their assigned PCP to coordinate their care.	Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the member's assigned Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services.
	Premium Plan (HMO)	Alameda	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers. Members are required to see their assigned PCP to coordinate their care.	Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the member's assigned Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services.



State	Product Name	Plan Service Area(s)	How do Members access Physicians and Health Care Professionals?	Does a Primary Care Physician have to make a referral to a Specialist?
NV	AVA (HMO)	Clark, Nye, Washoe, Carson City, Douglas, Storey	<p>AVA (HMO) Members choose a Virtual Primary Care Physician (PCP) from the network of Participating Providers that offer virtual visits. Members will access their secure online account to schedule appointments and join virtual visits.</p> <p>Members are required to see their assigned PCP to coordinate their care.</p>	<p>Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment.</p> <p>Virtual PCPs can request a referral by calling the Alignment Virtual Care Team.</p>
	Heart & Diabetes (HMO C-SNP)	Clark, Nye, Washoe, Carson City, Douglas, Storey	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers.	<p>Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services.</p>
	Platinum (HMO)		Members are required to see their assigned PCP to coordinate their care.	
	the ONE (HMO D-SNP)/el ÚNICO (HMO D-SNP)			
	Duals (PPO D-SNP)	Clark, Nye, Washoe, Carson City, Douglas, Storey	<p>PPO Members do not have to choose a network Primary Care Physician (PCP), however a PCP selection is strongly encouraged to help coordinate care.</p> <p>PPO Members can see any in-network provider without a referral.</p> <p>PPO Members can elect to use out-of-network providers but may be subjected to higher copays or co-insurance.</p>	<p>No - Referrals are not required to see a specialist for PPO Members.</p> <p>Prior authorization may be required for certain types of tests or services received in-network. Please refer to EOC for the list of services that require prior authorization.</p> <p>Prior authorization is not required for covered services received out-of-network; however, if Alignment later determines that the services received were not covered or were not medically necessary, Alignment may deny coverage.</p>
	Retiree Options (HMO)	Clark, Nye, Washoe	<p>HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers.</p> <p>Members are required to see their assigned PCP to coordinate their care.</p>	<p>Yes - Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services.</p>



State	Product Name	Plan Service Area(s)	How do Members access Physicians and Health Care Professionals?	Does a Primary Care Physician have to make a referral to a Specialist?
NC	AVA (PPO)	Avery, Buncombe, Chatham, Davidson, Davie, Forsyth, Guilford, Henderson, Johnston, Madison, McDowell, Mitchell, Orange, Transylvania, Wake, Wilkes	<p>PPO members do not have to choose a network Primary Care Physician (PCP), however a PCP selection is strongly encouraged to help coordinate care. PPO members can see any in- network provider without a referral.</p> <p>PPO Members can elect to use out-of-network providers but may be subjected to higher copays or co-insurance.</p>	<p>No - Referrals are not required to see a specialist for PPO Members.</p> <p>Prior authorization may be required for certain types of tests or services received in-network. Please refer to Evidence of Coverage for the list of services that require prior authorization.</p> <p>Prior authorization is not required for covered services received out-of-network; however, if Alignment later determines that the services received were not covered or were not medically necessary, Alignment may deny coverage.</p>
	Heart & Diabetes (HMO C-SNP)	Avery, Buncombe, Chatham, Davidson, Davie, Forsyth, Guilford, Henderson, Johnston, Madison, McDowell, Mitchell, Orange, Transylvania, Wake, Wilkes	<p>HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers.</p> <p>Members are required to see their assigned PCP to coordinate their care.</p>	<p>Yes – Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member’s Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services.</p>
	NC Duals (HMO D-SNP) Platinum (HMO-POS)	Avery, Buncombe, Chatham, Davidson, Davie, Forsyth, Guilford, Henderson, Johnston, Madison, McDowell, Mitchell, Orange, Transylvania, Wake, Wilkes	<p>HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers.</p>	<p>No - Referrals are not required to see a specialist.</p> <p>Prior authorization may be required for certain types of tests or services received in-network. Please refer to EOC for the list of services that require prior authorization.</p> <p>Prior authorization is required for covered services received out-of-network.</p>



State	Product Name	Plan Service Area(s)	How do Members access Physicians and Health Care Professionals?	Does a Primary Care Physician have to make a referral to a Specialist?
NC	Retiree Options (HMO)	Avery, Buncombe, Chatham, Davidson, Davie, Forsyth, Guilford, Henderson, Johnston, Madison, McDowell, Mitchell, Transylvania, Wake, Wilkes	HMO Members choose a Primary Care Physician (PCP) from the network of participating Providers. Members are required to see their assigned PCP to coordinate their care.	Yes – Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member's Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services.
	Retiree Options (PPO)	Avery, Buncombe, Chatham, Davidson, Davie, Forsyth, Guilford, Henderson, Johnston, Madison, McDowell, Mitchell, Transylvania, Wake, Wilkes	PPO members do not have to choose a network Primary Care Physician (PCP), however a PCP selection is strongly encouraged to help coordinate care. PPO members can see any in-network provider without a referral. PPO Members can elect to use out-of-network providers but may be subjected to higher copays or co- insurance.	No - Referrals are not required to see a specialist for PPO Members. Prior authorization may be required for certain types of tests or services received in-network. Please refer to Evidence of Coverage for the list of services that require prior authorization. Prior authorization is not required for covered services received out-of-network; however, if Alignment later determines that the services received were not covered or were not medically necessary, Alignment may deny coverage.



State	Product Name	Plan Service Area(s)	How do Members access Physicians and Health Care Professionals?	Does a Primary Care Physician have to make a referral to a Specialist?
FL	Platinum (HMO-POS)	Clay, Sarasota, Duval, Manatee	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers.	<p>No - Referrals are not required to see a specialist.</p> <p>Prior authorization may be required for certain types of tests or services received in-network. Please refer to Evidence of Coverage for the list of services that require prior authorization.</p> <p>Prior authorization is required for covered services received out-of-network.</p>
	Heart & Diabetes (HMO C-SNP)	Clay, Sarasota, Duval, Manatee	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers.	Yes – Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member’s Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services.
	Retiree Options (HMO)		Members are required to see their assigned PCP to coordinate their care.	
	the ONE (HMO D-SNP) / e1 ÚNICO (HMO D-SNP)			



State	Product Name	Plan Service Area(s)	How do Members access Physicians and Health Care Professionals?	Does a Primary Care Physician have to make a referral to a Specialist?
TX	Heart & Diabetes (HMO C-SNP)	El Paso, Hudspeth	HMO Members choose a Primary Care Physician (PCP) from the network of Participating Providers.	Yes – Referrals that require prior authorization, whether to a Participating Provider or out-of-network Provider, must be submitted to the Member’s Participating Provider Group for review and determination. Failure to obtain prior authorization may result in nonpayment of services.
	Retiree Options (HMO)		Members are required to see their assigned PCP to coordinate their care.	
	the ONE (HMO) / el ÚNICO (HMO)			
TX	AVA (PPO)	El Paso, Hudspeth	<p>PPO members do not have to choose a network Primary Care Physician (PCP), however a PCP selection is strongly encouraged to help coordinate care. PPO members can see any in-network provider without a referral.</p> <p>PPO Members can elect to use out-of-network providers but may be subjected to higher copays or co-insurance.</p>	<p>No - Referrals are not required to see a specialist for PPO Members.</p> <p>Prior authorization may be required for certain types of tests or services received in-network. Please refer to Evidence of Coverage for the list of services that require prior authorization.</p> <p>Prior authorization is not required for covered services received out-of-network; however, if Alignment later determines that the services received were not covered or were not medically necessary, Alignment may deny coverage.</p>
	Retiree Options (PPO)	El Paso, Hudspeth	<p>PPO members do not have to choose a network PCP, however a PCP selection is strongly encouraged to help coordinate care. PPO members can see any in-network provider without a referral.</p> <p>PPO Members can elect to use out-of-network providers but may be subjected to higher copays or co-insurance.</p>	<p>No - Referrals are not required to see a specialist for PPO Members.</p> <p>Prior authorization may be required for certain types of tests or services received in-network. Please refer to Evidence of Coverage for the list of services that require prior authorization.</p> <p>Prior authorization is not required for covered services received out-of-network; however, if Alignment later determines that the services received were not covered or were not medically necessary, Alignment may deny coverage.</p>

*All product names begin with Alignment Health Plan.



EXHIBIT 2.2 ALIGNMENT HEALTH PLAN 2023 PRODUCT OFFERINGS

State	Product Name	Plan Service Area(s)	How do Members access Physicians and Health Care Professionals?	Does a Primary Care Physician have to make a referral to a Specialist?
NC	FirstMedicare Direct smartHMO (HMO)	Wake	Members can self-refer to Physicians and Health Care Professionals within our network.	No - Referral from a PCP is not needed. Members can self-refer to contracted specialists for consultations.



SECTION 3 ELIGIBILITY AND ENROLLMENT

Overview

This section describes the eligibility requirements and enrollment process for Medicare-entitled beneficiaries. Member eligibility requirements are determined by Alignment in conjunction with CMS. There are six types of election periods during which beneficiaries may make enrollment requests. They are:

- The Annual Election Period (AEP)
- The Initial Coverage Election Period (ICEP)
- The Initial Enrollment Period for Part D (IEP for Part D)
- The Open Enrollment Period for Institutionalized Individuals (OEPI)
- The All Special Election Periods (SEP)
- The Medicare Advantage Open Enrollment Period (MA OEP)

1. Eligibility Requirements

To be eligible to enroll, a beneficiary must be enrolled with Medicare Part A and Part B coverage, reside within Alignment's approved service area, be a United States citizen or lawfully present in the United States. Enrollment in, or voluntary disenrollment from, Alignment constitutes an "election."

2. Limitations on Enrollment

Medicare beneficiaries who have elected Medicare hospice coverage prior to enrollment are still eligible to enroll in Alignment. Original Medicare is responsible for hospice services and for Part A and Part B services related to the Member's terminal prognosis. Alignment is responsible only for covered services that are not related to the Member's terminal condition. Alignment follows the CMS enrollment periods, as indicated in Chapter 2 of the [Medicare Managed Care Manual: Medicare Advantage Enrollment and Disenrollment](#).

Members that are newly enrolled in Alignment and are currently inpatient on the effective date of enrollment will be covered by Alignment following discharge from the inpatient hospital stay or when the Member is transferred to a lower level of care. Payment for the inpatient hospital services continues to be the responsibility of Medicare or the previous MA organization/health plan until the date of discharge. Alignment assumes responsibility for all other Part A and Part B coverage (except inpatient hospital care) on the effective enrollment date.

3. Member Eligibility

A beneficiary must complete and sign an individual election form in order to enroll in Alignment prior to the effective date of coverage. Alignment must verify Medicare entitlement for all enrollment requests using either the Batch Eligibility Query (BEQ) process or the MARx online query process (M232 screen).



Generally, the Member's enrollment becomes effective the first day of the following calendar month after an election is made. The Member's enrollment under any other Medicare Advantage Plan or standalone Part D plan (when applicable) will terminate on the effective date of enrollment with Alignment.

Alignment operates on "prospective enrollment," which means Alignment includes the names of its prospective Members and the names of the Members' PCP) on the eligibility report. But until confirmation and payment are received from CMS, Alignment does not include the Member's name on capitation reports. All confirmed retroactive capitation shall be paid accordingly to each capitated Participating Provider. All Members who appear on the Alignment eligibility report are to be rendered care when they present their Member identification card to their assigned PCP's office. Members are not to be denied services due to their name not appearing on the capitation report. Contact Alignment for verification of eligibility pursuant to Section 4 below.

4. Eligibility Verification

Participating Providers are responsible for verifying eligibility each time a member receives care.

Member eligibility can be verified through any of the following methods:

- By registering for access to AVA (see [Exhibit 1: Eligibility](#))
To obtain eligibility through AVA, participating providers must have either the Member ID number (example: 00012345601) or the Medicare Beneficiary Identifier (MBI) number or last name, first name and date of birth. In AVA, providers can verify member's current and past eligibility since their original enrollment with Alignment Healthcare. Additionally, providers can also submit, and track inquiries related to member eligibility and benefits.
- Using Interactive Voice Response (IVR) system (see [Exhibit 1: Eligibility](#))
To obtain eligibility through the IVR, participating providers must have the Member ID number (example: 00012345601), Medicare Beneficiary Identifier (MBI) number and date of birth. Through the IVR, you may verify the Member's eligibility as far back as January 1 of the previous calendar year. For dates of service prior to this, please contact the Eligibility Department (see [Exhibit 1: Eligibility](#)).
- By utilizing Alignment's Secure File Transfer Protocol (SFTP) site method for obtaining eligibility reports. For details on SFTP access, see Eligibility Reports.
- By calling Alignment's Eligibility Department (see [Exhibit 1: Eligibility](#)). Participating Providers must provide their National Provider Identifier (NPI) and Tax Identification Number (TIN) in order to verify Member eligibility and benefits. If issues arise during this process, please contact Network Management (see [Exhibit 1: Network Management/Provider Relations](#)).
- FirstMedicare Direct, Providers can access Members' eligibility status either through the Health Plan's website or by calling the Health Plan's Eligibility Department (see [Exhibit 1: Eligibility](#)).

Members with future effective dates can be verified only on or after their effective date.

5. Member Identification Card

New Members are mailed their Member identification (ID) card and their Welcome Packet upon enrollment with Alignment. If a Member requires services prior to receiving a Member ID card, the Member's confirmation/ acknowledgment letter or enrollment form may be used in place of the ID card. A Member ID card or enrollment form does not constitute Alignment coverage. Participating Providers should always verify eligibility prior to rendering services to any Member. To verify eligibility, contact the Eligibility Department (see [Exhibit 1: Eligibility](#)).



EXHIBIT 3.1

ALIGNMENT HEALTH PLAN MEMBER ID CARD SAMPLES

Alignment Health Plan HMO



Alignment Health Plan

[PLAN NAME (HMO)]

Member: [Member Name]	Eff Date: [01/01/22]
Member ID: [000123456789]	RxGrp: [H3815]
PCP Name: [Doctor Name]	RxBin: [610455]
PCP Phone: [(800) 100-1000]	RxPCN: [AHPPARTD]
Med Grp: [Medical Group]	RxD: [000123456789]
Med Grp #: [(405) 888-8888]	Plan Code: [020]
Member Services: (866) 634-2247/TTY 711	
Member Since [2022]	

MedicareRx
Prescription Drug Coverage

Primary Care: **[\$0]** Specialist: **[\$0]** ER: **[\$0]** Urgent Care: **[\$0]**



ALL CLAIMS MUST BE MAILED TO:

[P.O. Box 14010, Orange, CA 92863]



Pharmacy Technical Help Desk: (844) 227-7615

Member Pharmacy Help: (844) 227-7616

Provider Services: (888) 517-2247

Dental Benefits: (866) 454-3008

For information regarding special added benefits such as vision, hearing, etc. contact Concierge or Member Services. Pre-authorization is required for all non-emergent hospital admissions, please call 1-866-646-2247, Opt 4.

WWW.ALIGNMENTHEALTHPLAN.COM

Alignment Health Plan HMO (MultiPlan logo)



Alignment Health Plan

[PLAN NAME (HMO)]

Member: [Member Name]	Eff Date: [01/01/22]
Member ID: [000123456789]	RxGrp: [H3815]
PCP Name: [Doctor Name]	RxBin: [610455]
PCP Phone: [(800) 100-1000]	RxPCN: [AHPPARTD]
Med Grp: [Medical Group]	RxD: [000123456789]
Med Grp #: [(405) 888-8888]	Plan Code: [020]
Member Services: (866) 634-2247/TTY 711	
Member Since [2022]	

MedicareRx
Prescription Drug Coverage

Primary Care: **[\$0]** Specialist: **[\$0]** ER: **[\$0]** Urgent Care: **[\$0]**



ALL CLAIMS MUST BE MAILED TO:

P.O. Box 14010, Orange, CA 92863



Pharmacy Technical Help Desk: (844) 227-7615

Member Pharmacy Help: (844) 227-7616

Provider Services: (888) 517-2247

Dental Benefits: (866) 454-3008

MultiPlan
Medicare Advantage

Pre-authorization is required for all non-emergent hospital admissions, please call 1-866-646-2247, Opt 4.

WWW.ALIGNMENTHEALTHPLAN.COM



Alignment Health Plan HMO D-SNP



Alignment Health Plan

[PLAN NAME (HMO)]

Member: [Member Name] Eff Date: [01/01/22]
 Member ID: [000123456789] RxGrp: [H3815]
 PCP Name: [Doctor Name] RxBin: [610455]
 PCP Phone: [(800) 100-1000] RxPCN: [AHPPARTD]
 Med Grp: [Medical Group] RxD: [000123456789]
 Med Grp #: [(405) 888-8888] Plan Code: [020]
 Member Services: (866) 634-2247/TTY 711
 Member Since [2022]

Medicare_{Rx}
 Prescription Drug Coverage

WWW.ALIGNMENTHEALTHPLAN.COM

**ALL CLAIMS MUST BE MAILED TO:**

[Alignment Health Plan
 P.O. Box 14010, Orange, CA 92863]



Pharmacy Technical Help Desk: (844) 227-7615

Member Pharmacy Help: (844) 227-7616

Provider Services: (888) 517-2247

Dental Benefits: (866) 454-3008

For information regarding special added benefits such as vision, hearing, etc. contact Concierge or Member Services. Pre-authorization is required for all non-emergent hospital admissions, please call 1-866-646-2247, Opt 4.

**Member may have Medicaid coverage, do not balance bill member.
 Please verify Medicaid eligibility.**

Alignment Health Plan PPO



Alignment Health Plan

PPO**[PLAN NAME (PPO)]**

A Medicare Health Plan with Prescription Drug Coverage

[FIRST MIDDLE LASTNAME]

Member ID: [XXXXXXXXXX]	In-Network	Out-of-Network
Plan Code: [XXX]	Office Visit: [\$XX]	Office Visit: [\$XX]
RxGRP: [H4961]	Specialist: [\$XX]	Specialist: [\$XX]
RxBIN: [610455]	Emergency: [\$XX]	Emergency: [\$XX]
RxPCN: [AHPPARTD]		
RxD: [XXXXXXXXXX]		

Effective Date: [MM/DD/YYYY]

Medicare_{Rx}
 Prescription Drug Coverage

**ALL CLAIMS MUST BE MAILED TO:**

P.O. Box 14010, Orange, CA 92863



Member Services: (866) 634-2247 (TTY 711)

Pharmacy Technical Help Desk: (844) 227-7615

Member Pharmacy Help: (844) 227-7616

Provider Services: (888) 517-2247



Medicare limiting charges apply. For more information on benefit cost shares please call member services or visit our website.

WWW.ALIGNMENTHEALTHPLAN.COM



EXHIBIT 3.2 FIRSTMEDICARE DIRECT MEMBER ID CARD SAMPLES

FirstMedicare Direct smarHMO (HMO)

 <small>FIRSTMEDICARE DIRECT HEALTHCARE COMPANY</small>	
FirstMedicare Direct smarHMO (HMO)	
Member ID:	Date Printed: H6306-005-000
Member Name:	PCP Name:
Copayments:	
Primary Visit: \$0	Rx BIN: 015789
Specialty Visit: \$35	Rx PCN: CTRXMEDD
Emergency: \$80	Rx GRP: FCC005

FirstMedicare Direct • FirstMedicare.com
Member Services: (844) 499-5630 or TTY: 711
For Health Questions: 24 Hour Nurse Line (844) 323-2247
Medical Claims: Alignment Healthcare, P.O. Box 14010, Orange, CA 92863 EDI Payor ID CCHPC
Providers: Use FirstMedicare.com to check eligibility or claims status and for any preauthorization assistance. Bill Alignment Healthcare, not Medicare.
Provider Services and 24/7 Non-contracted ER: (844) 215-2442
Pharmacy Claims: OptumRx P.O. Box 650287, Dallas, TX 75265; (844) 569-4146
Members: This card is for ID purposes only. It is not a guarantee of eligibility. See your plan documents for details of coverage.

6. Lock-In Provision

Prior to enrolling with a health plan is, the beneficiary is educated on the lock-in provision, which requires that beneficiary obtain all medical care through the selected health plan. This provision applies from the effective date of coverage forward.

7. Eligibility Reports for Capitated / HMO Members

IPAs and Medical Groups, capitated Participating Provider Groups, or the PCP will receive a monthly eligibility report that contains a list of all eligible Members. Participating Providers should check the Member's effective and termination dates to ensure eligibility prior to rendering services. This report can be used to reconcile with the capitation report in order to verify that correct capitation has been received and that capitation includes retroactive activity. Alignment strives to ensure that our IPAs/Medical Groups, Participating Providers, and staff receive the most current information as soon as possible in order to facilitate patient care and referrals.



Alignment has a SFTP site method for obtaining eligibility reports, Qualified Medicare Beneficiary (QMB) reports, capitation reports, and any other format that contains Protected Health Information (PHI). PCPs and other providers can download monthly reports on our SFTP site, as stated in the provider's contract with Alignment. These secure servers allow providers to up download multiple files at once.

To access monthly reports, log in to the SFTP site (see [Exhibit 1: General Resources](#)), and follow these steps:

1. Select "Web Client." Click "OK"; then click "Continue."
2. Double-click the "OutBoundFromAHC" folder to open and locate the file corresponding to the desired report.
3. Double-click on the desired file. It will download to the Participating Provider's computer.
4. Double-click on the downloaded file to open.

Reports	Report Format
Capitation	IPACODE_CAP_YYYYMMDD.EXT
Eligibility	IPACODE_ELIGIBILITY_YYYYMMDD.EXT IPACODE_MEMBERREPORTINGCATEGORIES_YYYYMMDD.EXT
Pharmacy	IPACODE_RXCALINX_YYYYMMDD.EXT
Stars	IPACODE_STARS_YYYYMMDD.EXT
Monthly Membership	IPACODE_MMR_YYYYMMDD.EXT
Model Output	IPACODE_MOR_YYYYMMDD.EXT
Performance Dashboard Report	IPACODE_PERFORMANCEDASHBOARD_YYYYMMDD.EXT

The file name corresponds to the letters of IPA name, type of file (i.e., cap, eligibility, etc.), year, month, day, and ext.

For assistance, please contact Network Management (see [Exhibit 1: Network Management/Provider Relations](#)) or the EDI Department (see [Exhibit 1: Electronic Data Interchange](#)).

IPAs/Medical Groups will also receive the QMB report each month. This report can be used to identify dual-status beneficiaries.

Alignment distributes the eligibility report in two formats: Excel and fixed-length file.

Alignment can also distribute eligibility in an 834 format. If the 834 format is desired, please contact Network Management/Provider Relations. (see [Exhibit 1: Network Management/Provider Relations](#))

The eligibility report contains information on eligible Members for the current calendar month. The file consists of:

1. Member ID # (The ID # that is assigned to the Member by Alignment.)
2. Last Name
3. First Name
4. Middle Initial
5. Sex
6. Birthdate



7. SSN (Social Security Number; due to PHI, Alignment will no longer provide the SSN.)
8. MBI #
9. Address 1
10. Address 2 (Apartment numbers only.)
11. City
12. State
13. ZIP Code
14. Phone
15. HP Effective Date (The date the Member enrolled with Alignment.)
16. Medicaid (This field is populated with either "Y" or "N." If "Y" is populated, the Member HAS Medicaid; if "N" is populated, the Member DOES NOT have Medicaid)
17. PCP ID #
18. PCP Name
19. PCP Effective Date (The date the Member is eligible with his/her assigned PCP.)
20. Prospective (This field will identify the Members who are PROSPECTIVE, meaning that these Members are in the process of enrollment and their CMS confirmation is pending)
21. Tran Status
22. Term Date
23. Prior PCP Name
24. Prior IPA/Medical Group Name
25. New Mbr History
26. Mailing Address
27. Mailing Address 2
28. Mailing City
29. Mailing State
30. Mailing ZIP Code
31. RAF Score
32. RAF Type
33. LIS Level
34. LIS Date
35. Working Aged/Coordination of Benefits (COB)
36. Resident County
37. IPA/Medical Group POD
38. Primary Language
39. Benefits Option
40. Member Email
41. Contact Name
42. Contact Phone #
43. Contact Email



44. Contact Relationship

45. PCP Street

46. PCP Street 2

47. PCP City

48. PCP State

49. PCP ZIP Code

50. PCP Phone #

51. PBP (Plan Benefits Package)

- Mailing Address: "Mailing Address," "Mailing Address 2," "Mailing City," "Mailing State," and "Mailing ZIP Code," if populated, will indicate the Member's alternative address, which is NOT the Member's permanent address. The mailing address will populate only if the Member designates an alternative address to Alignment.
- Prior PCP Name + IPA/Medical Group Name: "Prior PCP Name" and "Prior IPA/Medical Group Name," if populated, will indicate that an existing Alignment Member has transferred into your office. These columns will help your current PCPs to contact a Member's prior PCP/IPA/Medical Group in order to obtain the Member's medical chart.
- New Mbr History: Identified Members who are new to your office are designated with an asterisk (*). Each asterisk accounts for one calendar month of enrollment; this will remain on file for four months. For each Member transferred into your office, a plus sign (+) shall be included and followed by an asterisk. Our goal is to assist you in identifying new Members, so that an initial health assessment or physical may be completed
- Working Aged/COB: "Working Aged/COB" shall identify Members with other coverage for coordination of benefits. This field will be populated with a "Y" (indicating yes) or "N" (indicating no). If the column is flagged with a "Y," the Member has other coverage, and additional information can be provided upon request from the Eligibility Department.
- RAF Score: "RAF Score" will include the Risk Adjustment Factor (RAF) score on the E-list. Managing your Member's RAF scores will enable delivery of appropriate, quality health care to our Members.
- LIS Level: The column "LIS Level" will indicate the LIS (Low Income Subsidy) level copayment, with a 0, 1, 2, 3, or 4 to indicate the different levels of co-pays. The column "LIS Date" will identify the effective date with the level of LIS.

8. Qualified Medicare Beneficiary (QMB)

Federal law prohibits all Medicare Providers from billing dual-eligible Qualified Medicare Beneficiary (QMB) Members for Medicare deductibles, copayment, and coinsurance. The QMB program assists low-income Medicare beneficiaries with their Medicare Part A and Part B premiums and cost-sharing. All Medicare and Medicaid payments received by Participating Providers for furnishing services to a QMB are considered payment in full. IPAs/Medical Groups or Participating Providers may request payment for these premiums and cost-sharing amounts from the state. Participating Providers are responsible for educating their staff on the importance of checking a patient's QMB status before billing for any deductibles, copayment, and coinsurance. Use AVA[®] to verify QMB status or call Alignment Eligibility (see [Exhibit 1: Eligibility](#)). As an additional resource, the IPAs/Medical Groups will receive, via SFTP, the aforementioned QMB report each month from Alignment. This report can be used to identify QMB Members. For information on Medicare billing restrictions, see [Medicare Learning Network](#).



Your QMB report contains beneficiaries with dual status for the current calendar month. The file consists of:

Name	Description	Format	Max Length
MEMBER_ID	Member ID	Text	25
LAST_NAME	Member last name	Text	30
FIRST_NAME	Member first name	Text	30
MI	Member middle initial	Text	3
SEX	Member gender code where "M" is for Male, and "F" is for Female	Text	1
DOB	Member date of birth	Date (YYYYMMDD)	8
MEDICARE_ID	Member Medicare ID (HIC/MBI)	Text	12
REPORTING_CATEGORY	Name of the reporting category. See section 4.0 for the definition	Text	60
REPORTING_CODE	Name of the reporting code. See section 5.0 for the definition	Text	50
START_DATE	Effective start date of the reporting code	Date (YYYYMMDD)	8
END_DATE	Effective end date of the reporting code	Date (YYYYMMDD)	8

9. No Balance Billing

Payments made by Alignment to Participating Providers, less copayment, coinsurance, or deductibles, (which are the financial responsibility of the Member) are considered payment in full. Participating Providers may not seek neither additional payments from Members, and shall hold Members harmless for the difference between the billed charges and the rate paid by Alignment nor any unpaid balance remaining after coordination of benefits.

Participating Providers, including but limited to Florida Providers, shall not deny services to a Member based on the Member's inability to pay a coinsurance or copayment amount.

Additionally, Participating Providers must follow applicable regulatory agency rules regarding cost share protection for Members. Participating Providers shall not hold any Member responsible for a cost share if that Member is cost share protected.

Florida Participating Providers: Providers will be compensated for cost-sharing obligations incurred on behalf of Florida D-SNP Members with applicable Medicaid eligibility categories covered by the Florida contract with Alignment.

10. PCP Selection

HMO Plan Members will be required to select a PCP, at the time of enrollment, who will provide services described in the Member's Evidence of Coverage (EOC) booklet. If the Member does not select a PCP or selects a PCP and the panel is closed, the Health Plan will assist the Member with his/her PCP selection or assign a PCP near the Member's residence.

PPO Plan Members are not required, but are strongly encouraged, to select a PCP. PPO Plan Members can see any doctor or specialist in the network without a referral. Prior authorization is not required for covered services received out-of-network; however, it is recommended that the Member and/or doctor ask for a pre-visit coverage decision to confirm that the services are covered and medically necessary by calling Member Services (see [Exhibit 1](#)).

The physician most likely to serve as a Member's PCP will receive outreach from Alignment regarding care coordination and quality.



11. Member Transfers Between PCPs

CMS guidelines allow transfers between PCPs without any annual limitation. These transfer requests may be made by the Member anytime. The effective date of transfer shall be the first day of the month following the transfer request. Members requesting a transfer should contact the Health Plan's Member Services Department. The transfer request procedure is as follows:

- Affected PCPs and/or the IPA/Medical Groups are notified of the transfer via the eligibility report.
- Once the request is completed, the Member is sent an updated Health Plan Member ID card.

12. Member Ineligibility

Members disenrollment will never occur on a day that is not the last calendar day of the month. A Medicare-entitled Member becomes ineligible for coverage under the Health Plan when any of the following situations occur:

1. The Member is no longer entitled to Medicare Part A and Part B. (Termination is effective the first day of the month following the month this occurs.)
2. The Member is not a United States citizen or lawfully present in the United States. (Termination is effective the first day of the month following the notification by CMS.)
3. The Member permanently moves out of the service area. The Member is required to notify the Health Plan if moving out of the service area. The Health Plan is required to provide emergency, Out-of-Area urgently needed services, or Out-of-Area dialysis services only until the Member's termination is effective with CMS. Members are allowed out of the service area for a maximum period of six (6) months per coverage period.
4. The Member becomes incarcerated. (The effective date of disenrollment will be the first of the month after the incarceration start date.)
5. The Member commits fraud or allows another person to use his/her Health Plan ID card to obtain services. Such terminations must be approved by CMS.
6. The Member is disruptive, abusive, unruly, and/or uncooperative to the extent that this behavior jeopardizes the well-being of any Participating Provider, Member, or employee, and the information is documented by the Health Plan. Such terminations must be approved by CMS.
7. The Member knowingly omits or misrepresents a material fact on the application for Membership. Such terminations must be approved by CMS.
8. The Health Plan's contract with CMS is not renewed.
9. The Member is deceased.

NOTE: The Member has the right to have his/her termination reviewed. Such termination, if not appealed or overruled, is effective on the date set forth in the notice.



13. Voluntary Disenrollment

A Member may not always be able switch plans until the appropriate election periods apply. If a specific election period applies to the Member and the Member wishes to make a change, he/she must submit a written request to the Health Plan's Member Services Department. The Member may also request that a disenrollment form be mailed to him/her. In addition, the Member may contact Medicare at 800-MEDICARE (800-633-4227). The written request must be signed before the effective date of disenrollment. Telephone requests for disenrollment will not be accepted but will be documented within the Health Plan's system, and a preprinted disenrollment form will be mailed to the Member at his/her request. When a written disenrollment request is submitted without a signature, the Health Plan shall verify the request to disenroll the Member by phone and shall document the contact and process the disenrollment request rather than return the written request as incomplete.

If a Member enrolls in another Medicare Advantage Plan, the Member will automatically be disenrolled from his/her current health plan when his/her Membership becomes effective with the new Medicare Advantage Plan. The effective date of the disenrollment is the first day of the month following the month in which CMS receives the Member's request.

14. Member Notification of Participating Provider Terminations

When a participating provider submits a notification of termination.

Alignment will notify all Members who are assigned to a PCP of the termination of PCPs regardless of the reason for termination. Alignment or IPA/Medical Group, as applicable, will make a good-faith effort to provide written notification to its affected Members of termination of a contracted IPA/Medical Group, PCP, Specialist, at least thirty (30) days prior to the termination effective date, as indicated in the Medicare Managed Care Manual, Chapter 11 (42 CFR 422.111(e)). Alignment and IPA/Medical Group, as applicable, will coordinate any continuity of care that is needed for Member.

*Members have the ultimate authority in their choice of Primary Care Physician.

15. Provider-Initiated Disenrollment of a Member

The Participating Provider can request that a Member be involuntarily disenrolled from the Participating Provider's practice if the Member does not respond to recommended patterns of treatment or exhibits repeated abusive behavior. Examples include the following:

- Repeated abusive behavior by the patient
- Assault
- Serious threats
- Disruption to IPA/Medical Group operations or to the Participating Provider's office
- Inappropriate use of Out-of-Network services
- Inappropriate use of medical services
- Noncompliance with a prescribed treatment plan



In all such instances of the above noncompliance, the Participating Providers recognize their responsibility for making reasonable efforts to counsel, educate, and advise Members of the potential harm that may result from their actions prior to submitting a Provider-Initiated Disenrollment. Participating Provider offices must document all occurrences in the Member's medical record. The IPA/Medical Group acting on behalf of the Participating Provider, and/or the Participating Provider, must send a certified letter to the Health Plan's Member Services Department stating the reasons for the disenrollment request to the respective addresses in [Exhibit 1](#).

The Health Plan's Member Services Department must evaluate the request and determine the conditions that would warrant the request. Until the effective date of an approved disenrollment, the Participating Provider shall continue to be responsible for the health care of the Member. Based on the outcome of the review, the Member may be transferred and notified according to policy or shall be given a Corrective Action Plan (CAP) to follow. If the Member does not respond to the CAP, an immediate transfer to another physician within the network shall be made. If the matter was due to noncompliant or disruptive behavior, a request for an involuntary disenrollment may be made to CMS.

The Health Plan recognizes that if a Member's disruptive behavior is of such a serious nature, one occurrence warrants an involuntary Participating Provider-to-Participating Provider transfer or involuntary disenrollment. Examples of this behavior include threatened or actual bodily harm to the Participating Provider or the Participating Provider's medical staff. These situations are reviewed on a case-by-case basis by the Health Plan's administrative staff, and a determination is made as to whether a Member CAP, Participating Provider transfer, or involuntary disenrollment is justified.

16. Member Notification of Provider Termination Due to Participating Providers' Being on the Preclusion List

The Participating Provider will notify those Members (who have received care in the last 12 months from a specialist, ancillary provider, hospital, or other practitioner) whose PCP is included on the CMS Preclusion List and, hence, no longer available to them.

The Health Plan will notify those Members (who have received care in the last 12 months from a PCP) whose PCP is included on the CMS Preclusion List and, hence no longer available to them. Members will be notified within thirty (30) days of the Health Plan receiving the Preclusion List.



SECTION 4 COMPLIANCE

Overview

Participating Providers are required to comply with federal law, including CMS regulatory requirements, and applicable state law, except where such state law is preempted by federal law. These requirements, including the Medicare Advantage Regulatory requirements, are included in your agreement with Alignment. Refer to [Exhibit 1](#) for Compliance Department contact information.

Alignment's Compliance Department will monitor and provide oversight to ensure Participating Providers comply with all applicable laws and regulatory requirements and that Participating Providers implement Corrective Action Plans when these requirements are not met.

Although your agreement with Alignment includes the regulatory requirements, a few compliance reminders are listed below, with others included throughout this Provider Operations Manual.

1. Offshore Attestation

No IPAs/Medical Groups or Participating Providers are to employ or contract with a person or an entity to which Medicare beneficiary Protected Health Information (PHI) will be either sent or accessed offshore without the prior written consent of the Health Plan. "Offshore" refers to countries outside the 50 United States and not in the United States territories (American Samoa, Guam, Northern Marianas, Puerto Rico, and the Virgin Islands). Examples of PHI include beneficiary name, birth date, address, social security number, Medicare beneficiary identifier, health insurance claim number, patient identifiers, medical diagnosis, medical history, treatment records, type of provider visited, use of health care services, payment information, evidence of insurance coverage, or any information that could reasonably lead to the identification of a beneficiary. All IPAs/Medical Groups or Participating Providers are to complete and submit an offshore subcontractor attestation to Alignment's Compliance Department in order to obtain approval prior to sending or providing access to Medicare beneficiary PHI offshore (see [Exhibit 1: Compliance](#)).

2. Obligation for Reporting Suspected Noncompliance, Fraud, Waste, and Abuse or HIPAA Privacy/ Security Violations

Participating Providers play a vital role in protecting the integrity of the Health Plan and the Medicare program. Alignment maintains an open-door policy in order to support and encourage Participating Providers to report compliance-related issues or concerns, to ensure that reports of questionable practices are handled as confidentially as possible, and to take issues that cannot be resolved to a higher level of management within their own organization.

The methods available for reporting noncompliance or Fraud, Waste, and Abuse (FWA) concerns, along with a non-retaliation policy, must be publicized throughout the Participating Providers' facilities. Participating Providers should train their employees on their own reporting processes, including emphasizing that reports may be made directly to the Health Plan, when applicable. Alignment has adopted and enforces a no-tolerance policy for retaliation or retribution against any Participating Provider or their employees who, in good faith, report suspected noncompliance, FWA, or HIPAA privacy/security violations. To this end, Participating Providers must ensure that their employees understand they:

- Have an obligation to raise compliance concerns and issues to the appropriate parties



- May seek clarification and guidance on compliance-related issues from the Participating Provider, Health Plan management, or the Health Plan's Compliance and Regulatory Affairs Department
- May report compliance-related issues anonymously and without fear of retaliation

Participating Providers should ensure that their employees know how to report suspected noncompliance, FWA, and HIPAA privacy/security violations either through the appropriate Participating Provider management or directly to Alignment. Additionally, there is a flyer posted on the Providers tab of the <https://www.alignmenthealthplan.com/providers/compliance-information>. For FirstMedicare Direct, please refer to [Compliance section of their website](#). See [Health Insurance Portability and Accountability Act of 1996 \(HIPAA\)](#) for more information.

3. Alignment Code of Conduct and Medicare Compliance and Fraud, Waste, and Abuse Plan

CMS guidelines require that Alignment distribute our Code of Conduct and the Compliance Policies and Procedures contained within the Medicare Compliance and Fraud, Waste, and Abuse Plan (also known as the "Compliance Plan") to our employees and first-tier, downstream, and related (FDR) entities. Alignment's Code of Conduct and Compliance Plan are accessible to FDRs in the Providers tab on the Alignment website while [FirstMedicare Direct's compliance page](#) can be accessed via their website.

FDR employees (temporary and permanent), board members, volunteers/interns, consultants, contractors and downstream entities, and subcontractors must receive a copy of Alignment's Code of Conduct and the Compliance Policies and Procedures or the FDR's own materially comparable Code of Conduct and written Compliance Policies and Procedures during orientation (or upon contracting, in the case of subcontractors) and upon revision and annually thereafter. Evidence of distribution and receipt of this information must be retained for ten (10) years in order to meet CMS' 10-year retention requirement, and it may be requested by Alignment upon audit.

4. OIG-GSA Exclusion List Screenings

Per CMS guidance, Medicare payment may not be made for items or services furnished or prescribed by an excluded provider or entity. Sponsors shall not use federal funds to pay for services, equipment or drugs prescribed or provided by a provider, supplier, employee, or first-tier, downstream, and related (FDR) entities excluded by the DHHS Office of the Inspector General (OIG) or by General Services Administration (GSA).

Participating Providers must review the DHHS OIG List of Excluded Individuals and Entities (LEIE list) and the GSA System for Award Management (SAM) prior to the hiring or contracting of any new employee, temporary employee, volunteer, consultant, governing body member, or downstream entity, and monthly thereafter, to ensure that none of these persons or entities are excluded or become excluded from participation in federal programs. Monthly screening is essential to prevent inappropriate payment to providers, pharmacies, and other entities that have been added to exclusions lists since the last time the list was checked. After entities are initially screened against the entire LEIE list and the SAM prior to hire or contracting, sponsors must review only the LEIE supplement file provided each month, which lists the entities added to the list that month and review the SAM updates provided during the specified monthly time frame.

OIG's LEIE list includes all health care providers and suppliers that are excluded from participation in federal health care programs, including those health care providers and suppliers that might also be on the SAM. In addition to health care providers (that are also included on the OIG LEIE list) the SAM includes non health care contractors.



Evidence of initial and monthly screenings must be retained for ten (10) years to meet CMS' 10-year retention requirement, and it may be requested by Alignment upon audit.

Website links are below:

- [OIG LISTSERV](#) via the OIG website
- [General Services Administration \(GSA\) database](#) via the SAM website

5. Nondiscrimination

Participating Providers must obey laws that protect Members from discrimination or unfair treatment. Participating Providers shall not deny, limit, or condition the provision of Covered Services to Members on the basis of any factor that is related to health status, including, but not limited to medical conditions, including mental as well as physical illness; claims experience; receipt of health care; medical history; genetic information; evidence of insurability, including conditions arising out of acts of domestic violence; or disability. Participating Providers shall not discriminate against Members in the delivery of health care services based on race, ethnicity, national origin, color, religion, sex, gender, age, mental or physical disability, sexual orientation, gender identity, genetic information, geographic location within the service area, or source of payment (i.e., Participating Providers cannot refuse to provide Covered Service to Members because the Member receives assistance with Medicare cost-sharing from a State Medicaid program). In providing Covered Services to Members, Participating Providers must comply with federal laws against discrimination, including, but not limited to, Title VI of the Civil Rights Act of 1964, the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, the Americans with Disabilities Act, Section 1557 of the Affordable Care Act, the Genetic Information Nondiscrimination Act of 2008, all other laws that apply to organizations that get federal funding, and any other laws and rules that apply for any other reason.

Additional information is available at HHS.gov ([Civil Rights for Providers of Health Care and Human Services](#) and [Patient Protection and the Affordable Care Act](#).)

6. Member Rights and Responsibilities

Members have the right to:

1. Receive information in a way that works for them and is consistent with their cultural sensitivities (in languages other than English, in Braille, in large print, alternate formats, etc.).
2. Fair and respectful treatment, free from discrimination based on race, ethnicity, national origin, color, religion, sex, gender, age, mental or physical disability, health status, claims experience, medical history, genetic information, evidence of insurability, or geographic location within the service area.
3. Timely access to covered services, including the right to:
 - a. Choose a Participating Care Provider in the Health Plan's HMO network to provide and arrange for covered services.
 - b. Choose a provider in the Health Plan's PPO network.
 - c. For HMO plans, go to a women's health specialist (e.g., a gynecologist) without a referral and, for PPO plans, to do so while paying in-network cost-sharing amounts.
 - d. Get appointments and covered services from the Health Plan's HMO network of providers within a reasonable amount of time.
 - e. Get appointments and covered services from providers within a reasonable amount of time for PPO plans.
 - f. Get timely services from specialists when care is needed.



4. Privacy of their medical records and personal health information.
5. Confidentiality of personal and health information, including the release of medical records, regardless of the format of that information (e.g., spoken communications, written materials, electronic records, facsimiles).
6. Access personal medical records in accordance with the law.
7. See the information in their medical records and know how it has been shared with others.
8. Participate in decisions about their personal health care and be educated on all available treatment options and associated risks (including the option of no treatment) or alternative courses of care that are available, regardless of cost or coverage by the Health Plan. Members must be told about any risks involved with their care and in advance if any proposed medical care or treatment is part of a research experiment, and they always have the choice to refuse any experimental treatments.
9. Utilize an advance directive, such as a living will or a durable health care power of attorney.
10. Appoint a representative to make health care decisions, including the decision to withhold resuscitative services or to withdraw life-sustaining treatment, if requested.
11. File complaints and obtain a prompt resolution of issues, including grievances or appeals relating to the authorization, coverage, or payment of services. When Members exercise this right, they must be treated fairly.
12. Obtain information regarding health care coverage and costs, and the rules that Members must follow when using coverage.
13. Obtain information about Participating Providers, including their qualifications and how they are paid by the Health Plan.
14. Obtain a written explanation for why a medical service is not covered or is restricted in some way and how to appeal the decision.

Members have certain responsibilities. These include the responsibility to:

1. Have a general understanding of their health care coverage, the rules that must be followed to receive care, and what they must pay out of pocket.
2. Inform the Health Plan of any other health insurance coverage or prescription drug coverage in addition to our plan, so benefits can be appropriately coordinated.
3. Show their Health Plan membership card whenever they get medical care or Part D prescription drugs.
4. Provide their physicians and other health care providers complete and accurate information necessary for appropriate health care; ask questions; and follow through on their care.
5. Pay any applicable co-payment, deductible, co-insurance, or charge for noncovered services when requested by their Alignment Participating Providers.
6. Be considerate, respectful of the rights of other patients, and to act in a way that helps the smooth-running of their doctor's office, hospitals, and other facilities.



7. Tell the Health Plan if they move outside the Health Plan service area or within the Health Plan service area, so that we can assist with their options to keep their Membership record up to date.

Inform the Health Plan of any questions, concerns, or suggestions.

For more information about Medicare beneficiary rights and protections, visit the Medicare website (<https://www.medicare.gov/basics/your-medicare-rights>). Please also refer to member's Evidence of Coverage (EOC) for the plan they are enrolled in.



SECTION 5 DELEGATION OVERSIGHT

Overview

Alignment's Delegation Oversight (DO) Department is responsible for the oversight of claims, credentialing, utilization management and case management delegated functions, as applicable, according to the Participating Provider Service Agreement.

Reporting and monitoring activities in this section are subject to change based on regulatory requirements and will be communicated to the IPA/Medical Groups or Participating Provider Groups by DO.

1. Delegated Entities

Those IPAs, Medical Groups, or Participating Provider Groups who have been delegated to conduct specific functions and/or activities on behalf of Alignment will have the delegated requirements included in their Participating Provider Service Agreements. IPA/Medical Groups or Participating Provider Groups must receive Alignment's prior approval before any of delegated responsibilities are subdelegated to another entity.

Adherence to these requirements is vital to ensuring that functions and activities meet the standards of the Centers for Medicare & Medicaid Services, the National Committee for Quality Assurance, applicable state regulatory requirements, other governing agencies, and any Alignment standards, as outlined throughout this Provider Operations Manual.

As a delegated entity, compliance with regulatory requirements and Alignment standards will be evaluated through annual oversight audits, periodic monitoring, or other assessments, as required, to ensure (1) compliance with regulatory requirements and (2) identification of potential performance deficiencies. All staff members having accountability for compliance with these standards must receive training to ensure comprehensive understanding of these standards. IPA/Medical Groups or Participating Provider Groups are responsible for maintaining records of training programs, including, at a minimum, dates, attendees, and a summary of the training provided.

2. Delegation Oversight Audit and Monitoring Programs

Annual Audits

DO conducts an Annual Risk Assessment of all Delegated Entities to determine whether an annual audit is warranted for the upcoming calendar year. Qualifying risks that may be considered are past performance of audits and/or monitoring, membership, or other criteria, as defined by Alignment.

Focused Audits

If deficiencies are found during an annual audit, a focused audit will be conducted, once a clean period has been established as part of the approved Corrective Action Plan. Corrections of all audit conditions must be demonstrated in the final audit report. Timing of the focused audit is dependent on the approved clean period. Adjustments to audit scheduling and clean periods may be considered. Please reference the Corrective Action Time Frames section for more details.

Focused audits may also be performed in response to reports of noncompliance by CMS, such as Complaint Tracking Modules – provider or member complaints filed directly with Medicare; state or federal regulatory agencies; or internal Alignment departments. The manner in which this review will be conducted is dependent on the nature of the complaint and the risk level identified (e.g., potential beneficiary harm).



Corrective Action Requests and Corrective Action Plans

A Corrective Action Plan (CAP) is a method of documenting a problematic situation, identifying root causes, and clearly outlining a way to correct the problematic situation(s).

Dependent upon the results of the monitoring or audit activities, submission of a CAP demonstrating remediation of any identified issues of noncompliance may be required.

A Corrective Action Request (CAR) will be issued to you by the respective area of DO (claims, credentialing, or utilization management).

An effective Corrective Action Plan (CAP) shall include, at a minimum:

- Provide a clear description of the problem or action that caused the issue
- Provide an explanation of how the issue was immediately stopped from accelerating; what immediate fixes were implemented
- Establish what caused the problem, that is, identification of the true root cause(s)
- Determine actions needed in order to prevent the issue from recurring
- Review the effectiveness of corrective action(s) taken and provide a description of monitoring and/or auditing process to be implemented (i.e., provide copies of reports showing results)
- Identify a "clean period," meaning the date the noncompliant issue has been remediated and can be tested to measure compliance

3. Corrective Action Time Frames

Draft Report

DO will issue a draft audit report approximately ten (10) business days after completing an audit or monitoring review. The IPA/Medical Groups or Participating Providers will have ten (10) business days to review and submit comments regarding our audit findings.

Final Report

Approximately ten (10) business days after receipt of the response to the draft report, DO will issue a final audit report. The final report will include responses to comments, if any, and updated audit scores, if applicable.

Corrective Action Plan Response

If a corrective action is warranted, the IPA/Medical Groups or Participating Providers must submit a completed Corrective Action Plan (CAP) to DO within fifteen (15) business days from the date the final audit report was issued.

DO will review the CAP and either accept as written or reject it approximately ten (10) business days after receipt of the CAP. If rejected, DO will work to ensure complete understanding of why the CAP was rejected, assisting with CAP revision.

Corrective Action – Validation

Once the CAP is accepted, DO will monitor progress and remain in contact throughout the remediation period. Approximately ninety (90) calendar days after the clean period, DO will schedule a focused, or "validation," audit to ensure that correction of all audit conditions cited in the final audit report has been demonstrated.



Upon passing the validation audit, the CAP will be considered closed. However, if acceptable remediation has not been demonstrated, the CAP will remain open. A second focused audit may be scheduled, or further monitoring may continue until remediation can be demonstrated. Escalation to Alignment's Senior Leadership may be warranted when a determination of further action will be decided.

4. Regulatory Requirements – Claims

Claims - Timeliness Requirements

If delegated for processing claims on behalf of Alignment, IPA/Medical Groups or Participating Provider Groups must adhere to the CMS (Medicare Advantage) processing standards and timeliness requirements in accordance with 42CFR § 422.520 prompt payment by the MA organization, IPA/Medical Groups or Participating Provider Groups must:

- **Pay 95 percent of clean claims within thirty (30) days** of receipt, if they are submitted by, or on behalf of, an enrollee of an MA private fee-for-service plan or are claims for services that are not furnished under a written agreement between the organization and the provider.
- **Pay interest on clean claims that are not paid within thirty (30) days**, in accordance with sections 1816(c)(2)(B) and 1842(c)(2)(B).
- **Pay or deny within sixty (60) calendar days all other claims** from **noncontracted** providers from the date of the request. (Alignment's compliance threshold is 95 percent.)

Claims Monitoring of Monthly Timeliness

Claims processing timeliness performance is monitored by the DO Claims staff to ensure meeting all claims-processing timeliness requirements.

Use AVA® to submit a Monthly Timeliness Report (MTR) to DO no later than the 15th of each month (see [Exhibit 1: Delegation Oversight](#)). Instructions for submitting this, and all other required reports, will be provided to you during your initial onboarding with Alignment and annually thereafter. Reporting instructions and templates are also available in AVA® (login needed).

If 30-day or 60-day monthly timeliness scores fall below the 95 percent threshold, a Corrective Action Plan will be required, along with the MTR.

The Industry Collaboration Effort (ICE) Approved MTR template is mandatory for monthly submissions. Please use the most recently updated version of the [ICE MTR template](#).

CMS Part C Reporting Requirements – Organization Determinations and Reconsiderations (ODR) Claims Report



Submitting a quarterly ODR Claims report to Alignment for review and validation by DO is required. The report must be submitted through AVA® (see [Exhibit 1: Delegation Oversight](#)). Instructions for submitting this, and all other required reports, will be provided during initial onboarding with Alignment and annually thereafter.

2023 Quarterly reports are due as follows:

- April 15, 2023
- July 15, 2023
- October 15, 2023
- January 10, 2024

Provider Dispute Resolution Reports (PDRs)

Quarterly PDR reports must be submitted to Alignment for review and validation by DO. The PDR report must be submitted through AVA® (see [Exhibit 1: Delegation Oversight](#)). Instructions for submitting this, and all other required reports, will be provided during initial onboarding with Alignment and annually thereafter.

2023 Quarterly reports are due as follows:

- April 15, 2023
- July 15, 2023
- October 15, 2023
- January 15, 2024

Organization Determination, Appeals, and Grievance (ODAG) Universe Table 3 (Claims)

Monthly ODAG Universe Table 3 must be submitted to Alignment for review and validation by DO. The ODAG Universe Table 3 is due on the 15th of each month. Instructions for submitting this, and all other required reports, will be provided during initial onboarding with Alignment and annually thereafter.

ODAG Universe Tables are used by CMS to conduct Medicare Advantage Health Plan program audits. In the event Alignment is selected for a program audit, IPA/Medical Groups or Participating Provider Groups Universe data may be tested by CMS. Failure to pass the data validation may require corrective actions.

Therefore, Alignment must validate data to ensure that reports are audit-ready and can pass a CMS review.

5. Regulatory Requirements – Credentialing

To ease the burden on provider organizations, in some of Alignment's markets, accredited health plans joined to create a collaboration to share their annual credentialing audit results. The credentialing audit results are posted on the Industry Collaboration Effort (ICE) website. As a health plan, Alignment can retrieve a copy of the audit results on ICE and measure audit outcomes against its own established performance thresholds. If appropriate, Alignment can rely on the ICE audit results for its annual credentialing audit.

If there is no participation in the ICE-shared credentialing audits by the IPA/Medical Groups or Participating Provider Group, the DO credentialing staff will conduct an annual desktop or on-site audit.



If applicable, the results of the shared credentialing audit on ICE are reviewed and measured against Alignment's performance standards by performing the following steps:

- Review the Audit Results Summary Page and File Results
- Review each credentialing standard and element, and assess the noted audit results and comments
- If the score is from 90 percent to 100 percent, DO will review the noted issues and determine if a CAP is needed
- If the score is less than 90 percent, DO will require a CAP
- The CAP will be reviewed by DO to ensure that the actions noted will remediate the issues in the audit report
- Alignment will request supporting documentation for the action-plan milestones

6. Regulatory Requirements – Utilization Management

Timeliness Requirements

If delegated for processing and issuing notices in response to preservice authorization requests, CMS (Medicare Advantage) notification and timeliness requirements must be adhered to.

Alignment's compliance threshold: IPA/Medical Groups or Participating Provider Groups must meet all timeliness requirements with a score of at least 95 percent or higher.

Please reference [Medicare Managed Care Manual: Parts C & D Enrollee Grievance, Organization/ Coverage Determinations and Appeals Guidance](#) for additional details.

CMS Notification Timeliness Requirements

Type	Processing Time Frame	With Extension
Standard Pre-Service	14 calendar days	28 days
Standard Part B Drug Request	72 hours	N/A
Expedited: Pre-Service	72 hours	17 days
Expedited: Part B Drug Request	24 hours	N/A

* 14-day extension if the Member requests the extension or if the MA plan (or Delegated Entity) justifies a need for additional information and documents how the delay is in the best interest of the Member. MA plan (and their Delegated Entities) must notify the Member, in writing, if extension is going to be taken and explain the reason for the delay.

Note: Part B drug and payment time frames cannot be extended. See: 42 CFR §422.568(b)(1) and (2).

Notification Requirements: Pre-Service Approvals

For favorable decisions on a pre-service request, notice may be provided verbally or in writing to the requesting party. Verbal or written notice of a favorable decision must explain any conditions of the approval, such as the duration of the approval.

Alignment recommends providing written notice of favorable decisions (including any applicable conditions/ parameters of the approval). If a Participating Provider submits the request on behalf of the Member, the MA plan (or Delegated Entity) must notify the Member as well as the Participating Provider of its determination.



DO will provide Alignment's approval and denial templates and training during initial onboarding and annually thereafter. The training information may also be found on [Alignment Health's Provider Portal](#).

Notification Requirements: Pre-Service Denials

A written denial notice must be sent to the Member (and the physician involved, as appropriate) whenever an MA plan's (or their Delegated Entity's) determination is partially or fully adverse to the Member.

Approved notice language must be used when issuing written denial notices to Members. The standardized denial notice is the Notice of Denial of Medical Coverage or Payment (Form CMS-10003-NDMCP), also known as the Integrated Denial Notice (IDN). DO will provide Alignment's approval and denial templates and training during initial onboarding and annually thereafter. The templates may also be found within the training information on [Alignment Health's Provider Portal](#).

A specific and detailed explanation must be provided of why medical services, items, or Part B drugs were denied, including a description of the applicable coverage rule or applicable plan policy (e.g., Evidence of Coverage provision) upon which the action was based, and a specific explanation about what information is needed in order to approve coverage must be included, if applicable.

Monthly Timeliness Reports

Pre-service authorization timeliness performance is monitored by our DO department's Utilization Management (UM) staff to ensure compliance with all pre-service timeliness requirements.

Use AVA® to submit a Monthly Timeliness Report (MTR) to DO no later than the 15th of each month through (see [Exhibit 1: Delegation Oversight](#)). Instructions for submitting this, and all other required reports, will be provided during initial onboarding with Alignment and annually thereafter. Reporting Instructions and templates are also available in AVA® (login needed).

Alignment's Pre-service Authorization MTR template must be used when reporting timeliness scores.

CMS Part C Reporting Requirements – Organization Determinations and Reconsiderations (ODR) (Preservice Organization Determinations) Report

Submitting a quarterly ODR Preservice Organization Determination report to Alignment for review and validation by DO is required. The report must be submitted through AVA® (see [Exhibit 1: Delegation Oversight](#)) Instructions for submitting this, and all other required reports, will be provided during initial onboarding with Alignment and annually thereafter.

2023 Quarterly reports are due as follows:

- April 15, 2023
- July 15, 2023
- October 15, 2023
- January 10, 2024

Organization Determination, Appeals, and Grievance (ODAG) Universe Table 1 (Standard and Expedited Organization Determinations)

Monthly ODAG Universe Table 1 must be submitted to Alignment for review and validation by DO. The ODAG Universe Table 1 is due on the 15th of each month. Instructions for submitting this, and all other required reports, will be provided during initial onboarding with Alignment and annually thereafter.



7. Reporting and Monitoring

To monitor the delegated functions performed by Alignment’s Delegated Entities, Alignment requires that either reports or documentation be submitted in the manner and frequency noted below.

All reports and/or documentation requests must be submitted through the AVA® (see [Exhibit 1: Delegation Oversight](#)). Instructions for portal submissions will be provided during initial onboarding training with Alignment and annually thereafter. Reporting instructions and templates are also available in AVA® (login needed).

Function	Report or Document	Method of Evaluation	Frequency of Report
Claims & UM	Monthly Timeliness Report (MTR)	<ul style="list-style-type: none"> Monitoring of timeliness performance Monitoring of timeliness corrective actions 	Monthly
Claims & UM	CMS Organization Determination, Appeals and Grievance ODAG Universe: Tables 1 (UM) Table 3 (Claims)	<ul style="list-style-type: none"> Data validation of UM and claims Sample testing conducted via live system review 	Monthly
Claims & UM	CMS Part C Reporting Requirements: Organization Determinations and Reconsiderations (ODR), for Claims and UM	<ul style="list-style-type: none"> Data validation for UM and claims Sample testing conducted via live system review 	Quarterly
Claims & UM	Member notices include, but not limited to: <ul style="list-style-type: none"> Integrated Denial Notices (IDN) (Claims & UM) Notice of Medicare Non-coverage (NOMNC) (UM) Detailed Explanation of Non-coverage (DENC) (UM) Pre-Service Approval Notices (UM) Carve-out benefit notices (UM) 	Sample review: <ul style="list-style-type: none"> During annual or focused audits If not selected for an annual audit, Alignment will conduct annual or biannual sample testing of all notices Testing may be completed either via live system or desktop top review 	Annually or Biannually
Credentialing	Provider and OP/HDO Credentialing: <ul style="list-style-type: none"> ICE Quarterly Credentialing Submission Form AHP Provider and OP/HDO 	Desktop review and monitoring	Quarterly
Credentialing	Ongoing Monitoring Log	Desktop review and monitoring	Quarterly
Credentialing	CMS Preclusion List: <ul style="list-style-type: none"> DO distributes a monthly Preclusion List to all Delegated Entities 	Track and review responses from delegated entities; Delegated entities must confirm if any of Precluded providers are contracted	Alignment distributes monthly Delegated entity responds monthly



SECTION 6 PROVIDER NETWORK

Overview

Alignment's Network Management Department negotiates and maintains all contracts in support of Alignment's provider network. Network Management works with Participating Providers on contract inquiries, compliance issues (ensuring that Alignment is compliant with CMS regulations, such as maintaining adequate provider networks and accurate/current provider directories), ensuring that Members are not balance-billed on services beyond their cost share, and ensuring that providers are trained on Alignment benefit plans and policies. To best serve members, Network Management also tracks and communicates provider performance standards.

1. Access to Care

Participating Providers are responsible for meeting all access and availability standards as required by CMS and reflected in "Access to Care" (see [Section 14. Quality Management](#)). If Member care is impacted by the Participating Provider's not meeting these standards, the Participating Provider is expected to work with Alignment to see Members within the prescribed access standards. If the appointment with the authorized specialist cannot be made within time frames set out in the Access to Care standards, the Participating Provider is to work with Alignment to have the Member seen by an alternative specialist within the Access-to-Care standards timelines.

2. Provider Network Changes

Participating Providers are to immediately notify Alignment of all adverse actions, which include, but are not limited to, Participating Providers being listed on the Office of Inspector General (OIG) and

Preclusion List or having a revoked, suspended, or expired license. Alignment must also be notified of those Participating Providers who are opting out of Medicare. Such Participating Providers will not be permitted to provide, prescribe, order or arrange for services to Alignment Members and must be terminated from the Alignment network.

Alignment will monitor any Preclusion List activity and notify the Participating Providers of any Participating Provider identified on the Preclusion List published by CMS. The Participating Provider is to monitor the OIG and General Service Administration sanction activity for all participants within thirty

(30) calendar days of the release of a report by the reporting entity or within thirty (30) calendar days of receiving a new alert. Appropriate reports and/or queries include, but are not limited to, the following:

- Medicare Opt-Out Physicians
- Medicare/Medi-Cal Provider Suspension and Ineligible List
- Medical Board, Osteopathic Medical Board
- Board of Behavioral Sciences
- Board of Psychology
- Board of Chiropractic Examiners
- Board of Registered Nursing
- Board of Occupational Therapy
- Physical Therapy Board or the License Facility Information System



In addition, the Participating Provider is to monitor license, board, and malpractice expirations on an ongoing basis to ensure that all licensure, certification, and malpractice information remain current throughout the credentialing cycle.

3. Terminations

CMS requires prompt outreach to Members when a provider is terminated. As such, Alignment requests the Participating Provider send notification as they become aware of an upcoming termination, informing Alignment of the estimated termination date. The participating Provider is required to provide Alignment with at least ninety (90) calendar days' prior written notice of the termination of any of its Participating Providers. In the event a Participating Provider is terminated with less than ninety (90) days' notice, the Participating Provider is required to provide Alignment with written notice within five (5) business days of becoming aware of the termination. PCP termination notices, however, must be provided with no less than sixty (60) days' advance notice, except for when termination arises from the death of the provider. In addition, for PCP terminations, the IPAs/Medical Groups, or Participating Provider must also provide Alignment with the following:

- Alternate Primary Care Physician to whom to transfer the Members and who will be accepting the Members*
- Termination reason (e.g., left service area, expired Drug Enforcement Administration) Number or License, Medi-care Opt-Out, deceased)
- Termination effective date

*Although an alternate PCP is required to be disclosed, Members have the ultimate authority in their choice of Primary Care Physician.

4. Additions

Participating Providers should provide Alignment with at least thirty (30) days' prior written notice of the addition of any new Participating Providers. The Participating Provider is required to send a complete profile that includes a copy of IRS Form W-9 and the data face sheet with the first and signature pages of the Participating Provider's contract with the IPA/Medical Group. Alignment will not process additions if the required information is not included. Incomplete requests will be returned to the IPA/Medical Group. Necessary information includes group and individual tax IDs, NPI, name, degree, specialty(ies), panel status (open or closed), whether to display the provider in the directory, practice address(es), phone number, fax number, and Medicare Certification (OSCAR) ID if a facility.

Nondelegated Participating Providers must be credentialed by Alignment prior to seeing Alignment Members. Refer to [Section 15](#) for the credentialing process and required forms. Upon completion of the credentialing process, the provider will be added to Alignment's panel of Participating Providers.

5. Panel Closures

Unless otherwise directed by Alignment, Participating Providers shall keep their patient panels open to new Alignment Members and shall not close their respective panels to any new Alignment Members if those patient panels remain open for any other patient or Member of any other health plan. Participating Providers should provide at least 90 calendar days' prior written notice to Alignment upon a Participating Provider's knowledge of any significant changes in capacity or his/her ability to arrange covered services to Members.

6. Demographic and Administrative Changes

The Participating Provider must notify Alignment of demographic or administrative changes at least 30 days prior to the date the change takes effect. Examples of these types of demographic or administrative changes include provider's name, practice location, telephone number, fax number, billing address, tax identification number, key contact person, etc. Alignment will update its provider database and directories accordingly.



7. Provider Directory Accuracy

CMS requires that Alignment maintain accurate provider directories. As such, Alignment also requires its Participating Providers to maintain accurate provider roster information and to promptly notify Alignment, or Alignment's designee, of any changes to the Participating Provider's provider roster including, but not limited to, the addition of new providers, the termination of any providers (including term date), and changes to any provider's name, practice location, practice name, telephone number, fax number for authorization purposes, specialty, and/or panel status (i.e., accepting new patients). Practice locations are defined as addresses where a Member can make an appointment to see a provider in person. Practice name represents the unique description or name of the physical office or facility, if it exists, that should be made accessible to the Member. Any network additions, terminations, or other such changes should be sent to Provider Data (see [Exhibit 1: Network Management/Provider Relations](#)). The data should be delivered in a manner that clearly outlines what the previous information was, what the new information is, and the date of change(s). It is expected that Participating Providers deliver data updates to Alignment within 10 days of the date by which provider information changes.

Additionally, Alignment will proactively engage in outreach to Participating Providers on a quarterly basis to validate roster participation, address, contract information and panel open vs. close status, among other roster and directory details.

If Participating Provider fails to submit accurate and current provider roster information, provide timely notification of provider changes, respond to provider directory validation requests from Alignment or Alignment's designee, or fails to regularly attest to their NPPES data, Alignment may suppress Participating Provider from Alignment's directories, cease to refer Members to Participating Provider, discontinue to accept new Participating Providers from the IPA/Medical Group or the Participating Provider's practice and/or terminate Participating Provider from the Alignment network. CMS considers inaccurate Provider data and directories a potential violation of its access and availability requirement, according to 42 CFR 422.111(b)(3) and (h)(2)(ii), 422.112, 423.128(d)(2).

Participating Providers will have fifteen (15) calendar days to respond to Alignment's directory validation requests, or such other time frame as requested by Alignment. Outreach requires agreement or disagreement with designated fields, along with subsequent corrections when the Participating Provider disagrees with the contained information.

8. NPPES Information Maintenance

Contracted health care providers are required to review, update, and certify existing provider information and are legally required to keep their data current in the National Plan & Provider Enumeration System (NPPES). On June 29, 2022, CMS issued a memo with the subject "Reminder to Update and Certify Provider Information in the Centers for Medicare & Medicaid Services' National Plan & Provider Enumeration System.."

Updating provider information in NPPES will provide organizations with access to a current database that can be used as a resource to improve provider directory reliability and accuracy. Organizations will be able to download the NPPES database and use it to update their own provider directories. Ultimately, CMS hopes that organizations can rely on the NPPES database as a means to decrease outreach to contracted providers and ultimately improve provider directory accuracy. For additional questions, see the [NPPES Frequently Asked Questions](#) document.

9. Use of Alignment-Contracted Providers When Alignment Is Financially Responsible for Services and Prior Authorization

For Delegated Participating Providers, when Alignment is financially responsible for a service as per the IPA's/Medical Group's Division of Financial Responsibility or as per the Delegated Participating Provider's agreement with Alignment



(when delegated for utilization management), the IPA/Medical Group and Delegated Participating Provider Group will be required to direct such services to providers that are contracted with Alignment, except as otherwise set forth below.

Both Delegated and Nondelegated Participating Providers will be required to comply with Alignment's prior authorization policy for those services requiring prior authorization (see [Section 13 Medical Management/Utilization Management](#).) Referrals to noncontracted providers require prior authorization from Alignment, and referrals need to be forwarded by either soft transfer (if via phone), fax, or portal within twenty-four (24) hours for urgent requests and within one (1) business day for standard requests. Failure to comply with Alignment's prior-authorization policy or failure to obtain prior authorization from Alignment may result in Participating Providers' being financially responsible for such services, up to and including offsets from future payments to the Participating Providers.

PPO Members can elect to use out-of-network providers but may be subjected to higher copays or co-insurance by choosing to do so. All services, procedures and medications listed on the prior authorization list still require clinical review for final determination.

10. Physician Incentive Plans

Physician incentive plan regulations are governed by CMS and prohibit any payment arrangements, whether directly or indirectly, made to a physician or physician group that might create an inducement to reduce or limit medically necessary services furnished to any Health Plan Members. If a physician incentive plan places a physician or physician group at substantial financial risk for services that the physician or physician group does not furnish itself, then such physician or physician group or Participating Provider, as the case may be, may be required to obtain stop-loss coverage in accordance with the requirements under the Physician Incentive Plan regulations. (See 42 CFR 422.208.)

11. Participating Provider-Based Activities

Alignment is responsible for any comparative/descriptive material developed and distributed on our behalf by our Participating Providers. As such, we must ensure that any Participating Providers (and their subcontractors) comply with CMS marketing rules. (See 42 CFR 422.2260 and 422.2262.) Participating Providers may not:

- Offer sales/appointment forms or accept enrollment applications
- Direct, urge, or attempt to persuade beneficiaries to enroll in a specific health plan based on financial or any other interests
- Mail marketing materials on behalf of health plan sponsors
- Offer anything of value to induce enrollees to select them as their Participating Provider
- Offer inducements to persuade beneficiaries to enroll in a particular health plan
- Conduct health screenings as a marketing activity
- Accept compensation, directly or indirectly, from a health plan for enrollment activities
- Use Alignment's logo or engage in co-branding without Alignment's prior written consent

Participating Providers should remain neutral when assisting health plan sponsors with marketing to beneficiaries or when assisting with enrollment decisions. Participating Providers may provide the names of health plans with which they contract and objective information on all benefits based on a patient's medications and health care needs.

Participating Providers may also make available or distribute health plan marketing materials, display posters for all health plan sponsors being offered, and refer their patients to other sources of information, such as CMS's website or phone number.



12. Provider Training

Alignment's Network Management Department is responsible for educating Participating Providers on Alignment and for providing access to provider educational materials, the Provider Operations Manual, newsletters, and reports. If the Participating Providers have training needs or questions, they should contact the appropriate Network Management/ Provider Relations Representative (see [Exhibit 1: Network Management/Provider Relations](#)).



SECTION 7 CAPITATION PAYMENTS AND REPORTING

Overview

Capitation payments and associated reporting is meant to both communicate and deliver information regarding payments to capitated providers. Payments typically occur at regular intervals and are based upon the specifications outlined in the contract with the IPA/Medical Group, and/or Participating Provider.

1. Capitation Payments

Alignment pays fixed monthly payments (i.e., capitation or other payment methodologies) to IPAs/Medical Groups and to certain other Participating Providers - for the provision of health care services provided or arranged by an IPA/Medical Group, or arranged by Participating Provider Groups, to its assigned Members who are the Participating Provider Group's responsibility, according to the terms of their agreements with Alignment. The payment schedule, unless otherwise stated in the Alignment agreement, is as follows:

If the payment date falls on a weekend or national holiday, payment will occur on the first subsequent business day, unless otherwise stated in the agreement.

Market/State	Payment and Capitation Detail Report Due Dates
California, Nevada, and Arizona	15th calendar day of the month
North Carolina	27th calendar day of the month

2. Capitation Adjustments

Alignment may apply adjustments to the capitation payments, which include but are not limited to the examples below:

- Retroactive adjustments either upward or downward due to retroactive changes in the number of IPAs/Medical Groups- or Participating Provider Groups assigned to Members
- Recoupment of claims paid by Alignment, which is the financial responsibility of the Participating Provider
- Deductions to fund the Shared Risk Withhold Pool as stated in the Participating Provider Services Agreement (applies to Delegated Providers)
- Withholds for failure to submit encounter data
- Withholds for failure to provide accurate and timely provider-roster information
- CMS revenue recoveries less vendor fees associated with such recoveries
- Deductions for services that the Participating Provider refers to providers that are not contracted with Alignment without Alignment's prior authorization, where such services are Alignment's financial responsibility
- Other adjustments as stated in the Participating Provider's agreement with Alignment made by CMS to Alignment's or a contracted managed care organization's monthly CMS payment



3. Capitation Remittance Report

The Capitation Remittance Report provides a summary of the payments and any adjustments for each Member assigned to the Participating Provider Group. The Capitation Remittance Report will be placed in the IPA/Medical Group's and Participating Provider's SFTP site each month for download on or before the capitation payment due dates included in the Alignment agreement.

If you have any questions, please email, or call the appropriate Network Management/Provider Relations representative (see [Exhibit 1](#)).



SECTION 8 CLAIMS

Overview

This section describes the claims-submission and other applicable requirements for processing fee-for-service claims. Alignment processes claims for reimbursement of services rendered to its Members in accordance with the CMS requirements and all applicable regulatory requirements.

Alignment also contracts with IPAs/Medical Groups for administrative services, such as claims payment. For information about claims that are processed by Alignment's contracted IPAs/Medical Groups, refer to the Delegated Participating Providers section.

1. Definition of Clean Claim

Unless otherwise specified in your contract with Alignment, a "clean claim" means a claim that has no defect or impropriety, including lack of any required substantiating information or documentation or any other circumstance requiring special treatment that prevents timely payment of the claim.

All claims, both electronic and paper, must conform to CMS clean claims requirements and claims billing and submission guidelines, including those set forth in the Medicare Claims Processing Manual and in accordance with prevailing Correct Coding Initiative (CCI) edits.

2. Claims Submission

Submission Formats

Alignment strongly encourages Participating Providers to submit claims electronically. Electronic claims submission is at no cost to the Participating Provider and helps effectuate the timely disposition of claims in accordance with CMS requirements.

Alignment applies the appropriate Strategic National Implementation Process (SNIP) edits for all claims received. Providers must bill the appropriate HIPAA-compliant billing codes. When billing codes are updated, the provider is required to use appropriate replacement codes for submitting claims for covered services.

Alignment will not reimburse any claims submitted using noncompliant billing codes.

Benefits of electronic claims submission include faster disposition, improved claims control, and standardized industry format.

Electronic Claims

Participating Providers can submit all professional and institutional claims including attachments (such as medical/emergency records, invoice, explanation of benefits from other health insurance or payer) electronically through Office Ally at no cost to the Provider. Participating Providers may use a different clearinghouse, if pre-approved by Alignment. Please note that some vendors and/or clearinghouses may charge a service fee. To enroll or contact Office Ally, please see the information in [Exhibit 1: General Resources](#).

When submitting fee for service claims through a clearinghouse, Participating Providers must supply the following Electronic Payer ID: CCHPC

When submitting encounters through a clearinghouse, Participating Providers must supply the following Electronic Payer ID: CCHP2



Paper Claims

Paper claims must be submitted on current CMS standard forms:

- Hospital, skilled nursing facility (SNF), home health, inpatient mental health, inpatient psych, and ESRD dialysis claims must be billed on UB-04
- Physician and all other claims (DME, lab/X-ray, transportation, and ancillary services,) except pharmacy, must be billed on CMS-1500

Paper claims submissions may be mailed to Alignment for processing. Participating Providers can mail claims to the Claims Department (See [Exhibit 1: Claims](#)).

Incomplete Claims

Claims submitted without all required information will be returned (paper claims) or rejected (electronic claims). Participating Providers are expected to promptly respond to requests for additional information and/or records to facilitate prompt payment and resolution of claims.

To avoid claims-processing delays, submit appropriate supporting documentation, which includes but is not limited to:

- Medical or emergency records
- Invoices
- Explanation of benefits for other health insurance or primary payer

Submission Time Frames

Participating Providers are encouraged to submit all claims as soon as possible to facilitate prompt payment. Unless otherwise stated in the Participating Provider's agreement with Alignment, claims are to be submitted within ninety (90) days from the date the services are rendered. Failure to submit claims within the defined time frame may result in denied claims.

3. Rejected Versus Denied Claims

Providers must ensure that paper claims submitted to Alignment are clean and accurate. Claims submitted by paper must be legible. Alignment may reject claims that are not processable (i.e., unclean) due to missing or invalid required information. Rejected claims do not have appeals rights. Providers must correct and resubmit claims for further processing or adjudication.

Alignment will deny a claim determined to be nonpayable. Claims considered as nonpayable include but are not limited to services, medical equipment, or supplies that are identified as noncovered benefits, claims for nonauthorized services, or otherwise due to the Member's lack of coverage.



4. Billing for Drug-Related Claims and National Drug Code (NDC) Reporting

When submitting drug-related claims and encounters, each claim line with a drug-related Healthcare Common Procedure Coding System (HCPCS)/Current Procedural Terminology (CPT) code must include the following additional information:

Required Information	Format Details (if applicable)	Other Requirements (if applicable)
11-digit NDC number on the container from which the medication was administered	No spaces or hyphens	<ul style="list-style-type: none"> If the NDC on the prescription label is fewer than 11 digits, it will be necessary to add leading zeros (0) If there is more than one NDC for the HCPCS/CPT code (e.g., compounded drugs, drugs with different strengths), each NDC and associated information must be submitted as a separate line item If billing multiple lines for the same injectable medication due to different NDC numbers, a modifier 59 is required Professional: Enter on field 24D of the CMS-1500 or Loop 2410 LIN03 segment of the HIPAA 837p electronic form Institutional: Enter on field 43 of the UB-04 or Loop 2410 LIN03 segment of the HIPAA 837ielectronic form Due to the implementation of the HIPAA X12 version 5010, only one LIN03 segment is used to report supplemental NDC information along with the HCPCS/CPT code
Unit price	EDI only	
Two-digit unit of measure code	E.g., GM (gram), ML (milliliter), UN (unit)	
Number of NDC units dispensed		
Prescription numbers		<ul style="list-style-type: none"> For electronic and direct data entry claims, the prescription number must be reported to link multiple service lines together for the same procedure code

5. Unlisted/Unclassified Codes

Alignment requires that Participating Providers submit the appropriate documentation on all claims for services or procedures that are not otherwise specified.

Alignment may send a request to Participating Providers for documentation that supports the need to bill for unlisted/unclassified procedure codes. Because unlisted/unclassified procedure codes do not describe a specific procedure or service, it is necessary for the providers to submit supporting documentation when filing the claim. (See the table below.) Claims billed with unlisted/unclassified procedure codes without supporting documentation will be subject to denial, if the provider fails to provide the supporting documentation.



Participating Providers must submit supporting documentation, along with the claim with unlisted/unclassified procedure codes. Claims without supporting documentation may be denied. The provider will need to rebill with appropriate documentation.

Type of Codes/Procedures	Required Documentation
All unlisted/unclassified codes billed	Clear description of the procedure or service
Laboratory and pathology procedures	All unlisted codes within the range of 80048–89356: Laboratory and pathology report
Medical procedures	All unlisted codes within the range of 90281–99602: Office notes and reports
Radiology/imaging procedures	Imaging report
Surgical procedures	All unlisted codes within the range of 10021–69990: Operative or procedure report attached to the claim stating what the procedure was and how the procedure was performed
Unclassified drug "J" codes	Unlisted J code and NDC number in appropriate fields
Unlisted DME HCPCS codes	Invoice along with narrative on the claim

6. Claims for Medicaid Services (Florida Only)

Participating Providers may not file/submit additional claims for Medicaid deductibles or co-payment reimbursement to Alignment or any other entity or agency. All payments shall be set forth in Participating Provider's contract with Alignment and shall be considered payment in full.

7. Corrected Claims

Providers resubmitting claims for corrections must clearly mark them as "Corrected Claim/s." Failure to mark the claim appropriately may result in denial of the claim as a duplicate. Corrected claims must be received within the applicable, timely filing requirements of the original claim.

8. No Balance-Billing

Under CMS regulations, Participating Providers cannot balance-bill the Member. Members cannot be billed for covered services beyond their normal cost-sharing amounts (copayment, deductible, or coinsurance). Providers shall not collect payments from Members for services, unless the Member has been advised in advance and in writing that such services may not be covered, and Alignment confirms such services are not covered.

9. Collection of Copayments, Coinsurance, and/or Deductibles

Participating Providers shall be responsible for the collection of copayments, coinsurance, and/or deductibles upon rendering covered services to Members. Participating Providers shall not refuse to provide covered services in the event a Member is unable to pay the Member's copayments, coinsurance, and/or deductibles except as may be otherwise specifically approved in advance by Alignment.

10. Coordination of Benefits – Medicare Secondary Payer and Third-Party Liability

Medicare Secondary Payer is the term generally used when the Member has other primary insurance, such as group health plans and large-group health plans. The decision as to who is responsible for paying first on a claim and who pays second is known as coordination of benefits.



Alignment does not pay for services to the extent there is a third party, which is required to be the primary payer. Providers shall bill the primary insurers first. Alignment pays up to the Member's cost-sharing amount with Alignment. Alignment may make secondary payments if both of the following apply:

- The primary-carrier payment is less than the gross amount payable by Medicare
- The provider does not accept and is not obligated to accept the primary-carrier's payment as payment in full

In the case and presence of third-party liability (e.g., workers' compensation, no-fault and liability insurance), Alignment makes conditional payments if the other insurance does not pay promptly. The conditional payments are subject to recovery when and if the other insurance does make payment.

All claims payments to providers are subject to retrospective review to determine whether any third-party liability exists and to recovery where such liability is determined to exist. Alignment may use a vendor to conduct a retrospective review on its behalf for third-party liability and recovery purposes.

11. Maximum Out-of-Pocket Limit

Alignment Members under certain benefits plans have limits on their cost-sharing amounts during a benefit year. Once these limits are reached for the benefit year, Alignment will no longer deduct cost-sharing amounts from the providers' payments until the following benefit year or when the Member changes benefits plans.

12. Claims Payment

Claims Processing Timeliness

Unless otherwise stated in the Provider's agreement with Alignment — or unless a longer period is allowed by law — claims are processed within sixty (60) calendar days of receipt of claims.

Electronic Funds Transfer (EFT) and Electronic Remittance Advice

Alignment contracted with Payspan to provide Providers access to remittance advice electronically, giving them the option to receive payment via EFTs. Providers may register through **Payspan** to receive electronic services. Providers may contact Payspan at using the information contained in [Exhibit 1: Electronic Fund Transfer \(EFT\) & Electronic Explanation of Benefits \(EOB\)](#).

13. Overpayment Recovery

Alignment processes overpayment recovery in accordance with CMS regulations or contractual agreements. By law, Providers are required to report and return overpayment to Alignment within sixty (60) calendar days after the date the overpayment was first identified.

Overpayments occur when too much has been paid to the Provider and a refund to Alignment is necessary. For Medicare Advantage health plans, overpayments commonly occur due to the following:

- Duplicate submission of the same service or claim
- Billing for excessive services or noncovered services
- Payment for excluded or medically unnecessary services



- Payment to the incorrect payee
- Claims-system configuration issues
- Pricing errors
- Incorrect adjustments
- Primary payment when Alignment Healthcare is the secondary payer

Alignment's look-back period for overpayments will be done in accordance with the time frames permitted by CMS, unless otherwise stated in the Participating Provider's agreement with Alignment. A prior written notification about the overpayment amount, along with the reason and time frame for returning overpaid amounts, is provided to the Provider. If the Provider does not submit a full refund within the time frame indicated on the written notification, Alignment will process recoupments against future claims payments.

Providers must mail refund checks, along with a copy of the notification or other supporting documentations, to the address in [Exhibit 1: Claims](#).

14. Clinical Trial Claims

Claims for Medicare-qualified clinical trials must be billed to the correct entity and with the appropriate coding per CMS guidelines, including, but not limited to, the National Clinical Trial (NCT) and Investigational Device Exemption (IDE) numbers.

Authorization is required for the services being rendered (if required per the Member's Explanation of Benefits) but is not required for a Medicare-qualified clinical trial performed as part of the service (e.g., a Member who is seeking a heart transplant must obtain authorization for the transplant but is not required to obtain authorization for a specific clinical trial associated with the transplant).

Coverage/ Responsibility	Investigational Item/Service (Qo)	Routine Services (Q1)	Financial Responsibility
Clinical Trial Policy	Covered, if otherwise coverable by Medicare in qualified study	Covered, if otherwise coverable by Medicare in qualified study	Primary responsibility: Original Medicare Secondary responsibility: Alignment (the difference between the Member's Original Medicare cost-sharing and the Plan's in-network cost-sharing) Submit Medicare Explanation of Benefits (EOB) to Alignment as proof of primary payment
Coverage With Evidence Development	Covered, if study is approved by CMS	Covered, if study is approved by CMS and otherwise coverable by Medicare	Alignment, unless Medicare determines the significant cost threshold has been exceeded
Investigational Device Exemption (IDE)	Category A: Not covered Category B: Covered, if study is approved by CMS	Categories A and B: Covered, if study is approved by CMS and otherwise coverable by Medicare	Categories A and B: Alignment



Refer to the following CMS resources for additional information:

- [CMS Clinical Trial Policy](#)
- [CMS Coverage With Evidence Development](#)
- [CMS Approved IDE Studies](#)

15. Payment Reconsiderations and Disputes

Participating Providers must submit disputed claims to Alignment within ninety (90) days from the receipt of the applicable claims determination from Alignment, unless otherwise stated in the Participating Provider Services Agreement.

Claims Payment Reconsideration and Dispute Submission

Claims payment reconsideration and disputes must be submitted, in writing, to the Payment Dispute address shown in [Exhibit 1: Claims](#).

Information that must be submitted:

- Provider's name and address
- TIN, NPI that billed for the services
- Health Plan claim number
- Copy of approved authorization (if applicable)
- Member's first and last names
- Member date of birth
- Health Plan Member ID number
- Dates of service: (From/To)
- Billed amount
- Paid amount
- Expected paid amount
- Detailed reasoning for the payment appeal or dispute
- Any other supporting documentation

Multiple disputes that are similar may be submitted in a batch. Batch similar issues together, and include a table that lists all required information, such as the items listed above.

16. Arbitration

A contracted provider who is unable to resolve a payment issue with Alignment via the dispute process may initiate arbitration per the contract.

17. Checking Claims Status

Participating Providers can use AVA® to check claims statuses and to submit inquiries or, alternatively, use the Alignment IVR system (see [Exhibit 1: Claims](#)).



To check status using the IVR system, one of the following sets of information will need to be entered:

- Claim number
- Member's ID number, date of service, and billed amount
- Member's date of birth, date of service, and billed amount

18. Misdirected Claims

Triage and sorting processes are established for claims that are identified as being the IPA's or Medical Group's responsibility to pay. Alignment works with the IPA/Medical Group in ensuring that claims are forwarded to the appropriate payer in a timely fashion. Claims are either mailed or electronically transmitted to the IPA/Medical Group via Office Ally. To avoid delays in processing your claims, please submit your claim to appropriate payors. In general, Part B services shall be billed to the IPA/Medical Group and Part A claims shall be billed to Alignment.

19. Division of Financial Responsibility (DOFR) – Related Issues/Questions

For any DOFR-related issues or questions, please contact your Alignment Network Management representative (see [Exhibit 1](#)).



SECTION 9 ENCOUNTER DATA

Overview

Encounter-data submissions are meant to support the full breadth of data associated with a Member's care. In conjunction with the efforts of Providers, encounter data delivers insight into diagnoses and past services rendered, allowing for augments to the care plans for Members. Encounter data is further used as part of Alignment's insight development on improvements and the streamlining of various reporting and regulatory materials. Accurate and timely encounter data submissions are a requirement from CMS for all Medicare Advantage Health Plans.

1. Encounter Data Submission Requirements

Information regarding electronic billing and electronic data interchange (EDI) transactions can be obtained by contacting Electronic Data Interchange (EDI), (see [Exhibit 1: Electronic Data Interchange](#)).

2. Alignment's Clearinghouse

Submission

Participating Providers can submit all professional and institutional claims electronically through Office Ally at no cost to the Provider. Participating Providers may use a different clearinghouse, if preapproved by Alignment. Please note that some vendors and/or clearinghouses may charge a service fee. To enroll or contact Office Ally, please see the information in [Exhibit 1: General Resources](#).

When submitting encounters through a clearinghouse, Participating Providers must supply the following Electronic Payer ID: **CCHP2**

When submitting claims through a clearinghouse, Participating Providers must supply the following Electronic Payer ID: **CCHPC**

Claims Attachments

Claims that require submission of supporting documents must be submitted in paper.

In order to avoid delays in claims processing, submit the appropriate supporting documentation which include but not limited to:

- Medical/emergency records
- Invoices
- Explanation of benefits from Other Health Insurance or primary payer

Paper Claims

Paper claims must be submitted on current CMS standard forms:

- Hospital, skilled nursing facility (SNF), home health, inpatient mental health, inpatient psych, and ESRD dialysis claims must be billed on UB-04
- Physician and all other claims (DME, lab/X-ray, transportation, and ancillary services), except pharmacy, must be billed on CMS-1500



Paper claims submissions may be mailed to Alignment for processing. Participating Providers can mail claims to the Claims Department (See [Exhibit 1: Claims](#)).

3. Encounter Data

Encounter data must be submitted electronically (using the ASC X12 837 format or successor formats) to Alignment or Alignment's claims clearinghouse vendor, as determined by Alignment, via the following:

- HIPAA-compliant ASC X12 Standards for Electronic Data Interchange Technical Report Type 3-Health Care Claim (Professional (837P) format, version 5010)
- Or successor version for the submission of professional health care claims
- Institutional (837I) format, version 5010
- Or successor version for institutional claims, if applicable

Additional submission requirements (e.g., timeliness and specific claims header/line level data elements) required for encounter completeness are provided in [Exhibit 9.1 Enterprise EDI Data Exchange Guidelines](#).

All claims submissions, both electronic and paper, must meet the [CMS billing guidelines](#) for required information. This includes encounter data for an IPA's/Medical Group's affiliated PCP, specialists, laboratories and imaging providers, and encounter data for all Participating Providers' affiliated providers.

The billing guidelines can be found at CMS.gov by accessing the following links:

UB Institutional: [CMS.gov Centers for Medicare & Medicaid Services Institutional Paper Claim Form](#)

CMS 1500: [CMS.gov Centers for Medicare & Medicaid Services Professional Paper Claim Form](#)

Participating Provider's responsibilities include:

- Submitting all claims details for adjudicated claims only, including all applicable billed, paid, adjusted, and denied information.
- Encounter claims should be submitted electronically directly to Alignment's designated clearinghouse.
- Encounter data should reflect all procedures performed by the Participating Provider during a single health care encounter and documented in the Member's medical record.
- All fee-for-service encounters must include the total billed amount, the total allowed amount (i.e., the total contracted amount), the Member's cost share, and Alignment's/the Health Plan's share.¹
- All capitated encounters must include the total billed amount, the Medicare Allowable amount, the Member's cost share, and Alignment's/the Health Plan's share.²
- Encounter data should use standard and current CMS code sets only, including Claims Adjustment Reason Codes, and Anesthesia Modifiers applicable for Medicare line of business.
- Encounter data should be submitted for capitated services and fee-for-service claims the week following the date such claim or encounter is finalized or adjudicated and should be received by the health plan within 90 days of the DOS.
- Lab encounter data should be submitted and should include all laboratory results data on a weekly basis in a standard HL7 format. If there is an inability to submit in HL7 format, submissions can be done via QSI format.



In addition to any contractual quality covenants, the expected encounter-data thresholds Per Member Per Year (PMPY) that Participating Providers are expected to submit are as follows:

Encounter category	PMPY benchmark
Encounter submission	Within ninety (90) days of service
Facility encounters – Total	2.30
Radiology/imaging procedures	Imaging report
Professional encounters – Total	12.00
Provider visit	6.00
Lab and radiology	4.00
Other professional	2.00

Alignment will measure the IPA's/Medical Group's and Participating Provider's compliance in submitting encounter data as follows:

- Encounter-data acceptance rate shall not be less than 95 percent of all data submitted.
- Encounter data shall meet the benchmarks, standards, and time frames, as outlined throughout this Provider Operations Manual.

¹ Requirements in accordance with [CMS guidelines](#)

² [Marketing Models Standard Documents and Educational Material](#)



SECTION 9.1 ENTERPRISE EDI DATA EXCHANGE GUIDELINES

Use of electronic EDI transactions allows providers and independent practice associations (IPA's) to submit a variety of transactions in support of a timely, data driven healthcare delivery system. Electronic transactions facilitate a more accurate way to be paid for claims faster, and to accomplish this at a lower cost than is generally the case for paper or manual transactions. Submitting transactions electronically in compliance with Health Insurance Portability and Accountability Act - Administrative Simplification (HIPAA- AS) regulations is easy. We accept standard electronic ASC X12N 5010 and HL7 clinical transactions through either direct submissions or commercial clearinghouses identified by simply using our Payer ID.

Summary of Electronic Transactions:

Depending on the specifics of a provider and/or independent practice associations (IPA's) contract relationship, additional data transaction requirements may be necessary. A summary of the typical inbound standard electronic transactions is listed below.

#	Type	Transactions Supported	Required Frequency	Protocol
1	IPA Claim Encounters	837 ASC X12N 5010 Payer ID: CCHP2	Daily	Clearinghouse (Office Ally, TransUnion)
2	Claims	837 ASC X12N 5010 Payer ID: CCHPC	Daily	Clearinghouse (Office Ally)
3	Authorizations	Custom Format	Daily	Direct sftp.ahcusa.com
4	Lab Results	HL7	Daily / Real-time	Direct sftp.ahcusa.com
5	ADT	HL7	Daily / Real-time	Direct sftp.ahcusa.com
6	Pharmacy Claims	MCEF (PBM format) Custom format	Daily	Direct sftp.ahcusa.com
7	Vision Claims	837 ASC X12N 5010	Daily	Direct sftp.ahcusa.com
8	HEDIS Supplemental Data	Custom format (IPA Standard) Custom format (Cozeva layout)	Monthly	Direct sftp.ahcusa.com
9	CRR Supplemental Data	ASM Supplemental format	Weekly	Direct sftp.ahcusa.com
10	Enrollment	834 ASC X12N 5010 Custom Format	Daily	Direct sftp.ahcusa.com

For questions regarding companion guides or specific requirements for each transaction, account setup, test transaction scheduling and production support, please use the following contact information. Please note that your inquiry will be handled during normal business hours.

The EDI Support team will return your inquiry within one business day. If your request is urgent, please make sure your request is identified as "URGENT" on e-mail and voicemail correspondence.

Alignment Health Plan EDI Contact Information

E-Mail Contact:	AHCEDI_Support@ahcusa.com
Support Contact	Monday thru Friday 6:00 AM PT to 5:00 PM PT Toll Free (844) 286-2855

**Electronic Submissions of Claims and Encounters through Commercial Clearinghouses**

#	Type	Transactions Supported	Required Frequency	Protocol
1	IPA Claim Encounters	837 ASC X12N 5010 Payer ID: CCHP2	Daily	Clearinghouse (Office Ally, TransUnion)
2	Claims	837 ASC X12N 5010 Payer ID: CCHPC	Daily	Clearinghouse (Office Ally)

When submitting claims and/or encounters through your clearinghouse, providers and independent practice associations (IPA's) must supply the following payer ID for Alignment Health Plans:

For Alignment Health Plan Independent Practice Associations (IPA's)	
Office Ally Clearinghouse:	Contact: Sheila Odeen Client Support Coordinator Office Ally, Inc. PayerSupport@OfficeAlly.com Direct: (360) 975-7000 Ext 6258 Fax: (360) 896-2151
IPA Electronic Claim Encounters Payer ID:	CCHP2
TransUnion Clearinghouse:	Contact: Cherise Funakoshi Sr. Business Relationship Manager Email Cherise.Funakoshi@transunion.com Office: 310.337.8513 Mobile: 760.213.1890 Transunion 200 Corporate Pointe Suite 350 Culver City, CA 90230 www.transunion.com/payers
IPA Electronic Claim Encounters Payer ID:	CCHP2
For Providers	
Office Ally Clearinghouse:	
Electronic Claims Payer ID:	CCHPC

Additional Clearinghouse information:

For providers and independent practice associations (IPA's) that do not currently participate in electronic claims submission, there are many options through vendors and/or clearinghouses that offer electronic claims submission programs. Providers can file claims electronically through a clearinghouse of their choice or partner with Office Ally (<https://www.officeally.com>). Please note that some vendors and/or clearinghouses charge a service fee. Contact the clearinghouse of choice for more information.

Office Ally Contact Information	
Customer Service	(360) 975-7000 Option 1 or info@officeally.com
Business Hours:	Monday thru Friday 6 AM PT to 5 PM PT
	After Hours Support is also available 24/7

**Helpful Hints for Electronic Submissions:**

- Ensure that you are an authorized representative of the designated provider
- Have your contact, organization, and financial account information available
- Supply your NPI in the Provider ID field

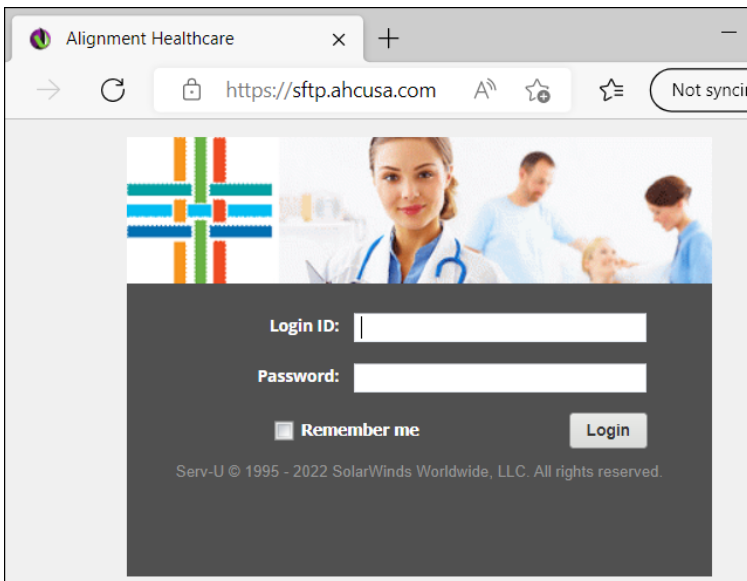
Alignment Health Plan offers and supports SFTP (SSH) and HTTP/S (Browser) connections via any modern Web Browser (Internet Explorer, Chrome, Firefox, etc.)

Office Ally Contact Information

FTP Application:	sftp.ahcusa.com
Support Contact	https://sftp.ahcusa.com

Username = (AHC supplied FTP User Account)

Password = (AHC supplied FTP User Account)



For general questions regarding account setup, test transaction scheduling and production support, please use the following contact information. Please note that your inquiry will be handled during normal business hours.

Alignment Health Plan EDI Contact Information

E-Mail contact:	AHCEDI_Support@ahcusa.com
Support Contact: Toll Free	Toll Free (844) 286-2855

The EDI Support team will return your inquiry within one business day. If your request is urgent, please make sure your request is identified as "URGENT" on e-mail and voicemail correspondence.



SECTION 10 APPEALS AND GRIEVANCES

Overview

Reconsiderations and redeterminations are appeal procedures that apply when a Member disagrees with a decision about a payment or provision of services (either a preauthorization denial, claims denial, or prescription drug denial, in whole or in part). Federal regulations require special appeals process procedures for Medicare Members who are enrolled in a Medicare program. The Explanation of Coverage (EOC) details the appeals and grievance process and procedures. Please review the EOC for the Member's respective Health Plan located on the company websites (see [Exhibit 1](#)).

1. Initial Organization Determination

An initial determination is made when either Alignment, the Health Plan, an IPA/Medical Group, or a delegated Participating Provider Group approves or denies payment on a service rendered or has failed to authorize or provide a service. For Alignment's process on Initial Organization Determinations, refer to [Section 13: Medical Management/Utilization Management](#) of this Provider Operations Manual.

2. Redetermination – Part D Appeals

A Member who is dissatisfied with the initial determination of his/her Part D drug coverage request may ask for a redetermination within sixty (60) days of the initial determination. A request for redetermination may be initiated orally or in writing. Requests should be directed to the pharmacy benefits manager delegated by Alignment or the Health Plan.

3. Reconsideration – Parts A and B Services and Items, and Part B Drugs Appeals

A Member who is dissatisfied with the initial determination of his/her request for service (including a Part B drug) or claims payment of services (post-service) may request a reconsideration within sixty (60) days of the initial determination. A request for reconsideration may be initiated orally or in writing.

If Alignment, an IPA/Medical Group, or a delegated Participating Provider Group denies a request for service and the Member appeals the decision, the Health Plan must reconsider its decision as quickly as the Member's health permits but no longer than 30 days (standard request for pre-service), seven (7) days for a standard Part B drug request, or seventy-two (72) hours (expedited service or expedited Part B drug request) after receipt of the appeal.

The Health Plan is required to take the following actions:

- Review the initial determination.
- Ensure that the reconsideration/redetermination decision is not made by the same person or persons who were involved in making the initial determination, if denied for medical necessity.
- Send a written notification of the appeal decision. For reconsiderations (medical services or claims- payment appeals), if the decision has been made to uphold the initial determination, the interested party will be informed that the case has been forwarded to CMS' Independent Review Entity, (MAXIMUS Federal Services) for third-party review.
- Standard and expedited appeals received by Alignment for denials due to "lack of medical necessity" will be reconsidered by a physician with expertise in the medical field appropriate to the services under appeal.



If Alignment overturns the original decision to deny a service, Alignment will authorize the service in question as quickly as the Member's health requires but no later than seventy-two (72) hours for expedited appeals and twenty-four (24) hours for expedited Part B, thirty (30) calendar days for standard pre-service and sixty (60) calendar days for payment requests from the date that Alignment reverses its determination.

4. MAXIMUS Federal Services

If the original determination is upheld in whole or in part, Alignment is required to send a new notification to the Member stating this information. At that point, the case file is forwarded to CMS' contractor MAXIMUS Federal Services for processing. Alignment will prepare the files for MAXIMUS by identifying each one with the Member's name and health insurance number. Alignment will communicate to the Member that the final determination will be made by CMS. If the decision is overturned by MAXIMUS, Alignment must authorize, within seventy-two (72) hours, expedited service or provide the service in question as quickly as the Member's health requires but no later than fourteen (14) calendar days; payment requests, thirty (30) calendar days from the date of the MAXIMUS letter informing Alignment of the decision. Alignment reserves the right to request a reopening of the MAXIMUS decision.

5. Administrative Law Judge (ALJ)

A Member who is dissatisfied with the CMS reconsideration may request a hearing before an Administrative Law Judge (ALJ). The Member may file this request with the Office of Medicare Hearings and Appeals (OMHA), as noted in the MAXIMUS Federal Services decision notice. In order to qualify, the dispute must involve an amount predetermined by CMS. The request for this type of hearing must be filed in writing, and it must be filed within sixty (60) calendar days of the date of the reconsideration notice. Although Alignment may not appeal a MAXIMUS reconsideration decision, it is party to any ALJ hearing.

After the third level of appeal with the ALJ, the appeal process may continue through the fourth (Medicare Appeals Council) and fifth levels (Federal District Court), if either Alignment or the Member requests the review and the amount in controversy meets the CMS-defined threshold. Additionally, any decision may be reopened by any entity that rendered a decision within twelve (12) months of the notice of initial or reconsidered determination, after such a 12-month period but within four years for just cause; or at any time, for a clerical correction or suspected fraud or to consider new evidence that was not available earlier.

6. Expedited Appeals Process

Members are notified of the appeals processes, including the right to an expedited review, at initial enrollment and upon notification of an adverse determination. The Member, or physician on behalf of the Member, can file an expedited appeal, if he/she does not agree with the health care decisions made by Alignment. Health plans routinely have 30 days to process a standard appeal and seventy-two (72) hours for an appeal regarding medication. However, in certain cases, the Member has a right to an expedited, 72-hour appeal (including Part B drugs) and twenty-four (24) hours for an appeal regarding part D medication. The Member can receive a faster expedited appeal if the Member's health or ability to regain maximum function could seriously be harmed by waiting for a standard appeal, which might take up to thirty (30) days. If an expedited appeal is requested by the Member, the Health Plan will evaluate the request and determine whether it qualifies for an expedited appeal. If it does not meet the requirements, the 30-day processing time will be invoked.



The Member may file an oral or written request for a 72-hour appeal if the Member has missed the deadline for requesting a Quality Improvement Organization (QIO) review from Health Services Advisory Group (HSAG) of a termination of services from a skilled nursing facility (SNF), home health services, or Comprehensive Outpatient Rehabilitation Facility services. The Member must specifically state that an expedited appeal is being requested and that the Member believes that his/her health could be harmed by waiting the standard appeal period. If any doctor asks the Health Plan, on behalf of the Member to conduct an expedited appeal or supports the Member's request for a quicker appeal, the Health Plan must expedite the appeal. CMS routinely publishes regulations for the expedited determination of preauthorization and appeals. These regulations apply to Medicare-contracted Participating Providers.

7. Fourteen-Day Extension

If an extension will benefit the Member, an extension of up to fourteen (14) calendar days is permitted for both a standard appeal (30 days) and an expedited appeal (72 hours). If the Member needs time to provide additional information to the Health Plan, or additional diagnostic tests need to be completed, an extension will be granted. The Health Plan will decide on an expedited appeal and notify the Member within seventy-two (72) hours of receiving the request. If the decision does not fully favor the Member, the Health Plan will automatically forward the appeal request (medical service and claim payment only) to CMS' contractor, MAXIMUS Federal Services, for an independent review. MAXIMUS will send the Member a letter with its decision within ten (10) working days of receipt of the Member's case from Alignment.

8. Oral Requests for Expedited Appeals

Oral requests for expedited appeals should be directed to the Health Plan's Member Services Department. The Health Plan will document the oral request in writing. CMS requires that Medicare Advantage health plans, delegated IPAs/ Medical Groups, and delegated Participating Provider Groups have a process in place to record and respond to all verbal requests for an appeal. Requests for appeals may be received in writing by the Medicare Advantage health plan, the Social Security office, or the Railroad Retirement Board (RRB) office. All requests received orally must be documented. When an appeal is received, the Medicare Advantage health plan, or the delegated Participating Provider Group, must:

- Document the Member's information, the Participating Provider's information, the appeal issue, and the date and time that the request was received.
- Obtain all pertinent information, including medical records.
- Ensure that the review of denied service or claim is conducted by an individual who is not involved in the original review and denial.
- Notify the Member of the appeal decision in writing within thirty (30) calendar days for service appeals and within sixty (60) calendar days for standard appeals.

9. Fax Request for Standard or Expedited Appeals

Faxed written requests should be directed to the Member Services Department (see [Exhibit 1: Member Services](#)). If a Member is in a hospital or a skilled nursing facility, he/she can request assistance in having a written appeal faxed to Alignment or to the Health Plan. It is important to note that the time limit for the review of the appeal will not begin until the request for the appeal has been received.



Participating Providers should direct Members to call Alignment's or the Health Plan's Member Services Department using the contact information (see [Exhibit 1: Member Services](#)) which includes phone and fax numbers for initial determinations, reviews, or appeals.

10. Medicaid Services Grievance and Appeals (Florida Only)

Participating Providers in Florida must follow Florida Grievance and Appeals and Fair Hearings processes related to Medicaid Services that are not covered under CMS or HHS. Please refer to 42 CFR Part 431, Subpart E and 42 CFR Part 438, Subpart F for more information.

11. Grievance Overview

A grievance is any complaint or dispute, other than one involving an organization determination, expressing dissatisfaction with the manner in which a Medicare Advantage plan or Participating Provider provides health care services, regardless of whether any remedial action can be taken. A Member may make a complaint or initiate a dispute, either orally or in writing, to Alignment, the Health Plan, the Participating Provider, or the facility. A grievance may also include a complaint that Alignment (or its delegated entity) refused to expedite an organization determination or reconsideration. In addition, grievances may include complaints regarding the timeliness, appropriateness, access to, and/or setting of a provided health service, procedure, or item. Grievance issues may also include complaints about a covered health service procedure or item during a course of treatment not meeting acceptable standards for the delivery of health care (quality-of-care complaint). A quality-of-care complaint is an event, or sequence of events, that has negatively impacted a Member's medical outcome. All complaints of this nature require submission at the time they are identified but no later than within twenty-four (24) hours.

12. How to File a Grievance

A Member who is dissatisfied or has a grievance that falls into the noted categories may call the Health Plan's Member Services Department (see [Exhibit 1: Member Services](#)).

When submitting a written complaint or dispute, the Member must include all pertinent information from the Member ID card and the details of his/her concern. Alignment will acknowledge receipt of the request within five (5) days and will review the grievance and respond to the Member in writing within thirty (30) days (plus 14 days, if an extension is taken).

The written response will state if additional time is necessary to complete the review, or it will provide a determination regarding the case. A written notice will be sent once the determination has been made.

Members may also contact Alignment or the Health Plan (see [Exhibit 1: Member Services](#)). For online complaints, Members may visit Medicare.

13. Notice of Denial of Medical Coverage (NDMC)

Alignment, IPAs/Medical Groups, and delegated Participating Provider Groups are responsible for sending Notice of Denial of Medical Coverage (NDMC) determination/service denial letters to Members for initial determination. The Health Industry Collaboration Effort (ICE) received approval from CMS to standardize the service-denial templates. In accordance with standards established by CMS, Alignment, and its delegated IPAs/Medical Groups/Participating Provider Groups are required to issue service-denial letters.



In compliance with the CMS guidelines, an acute care hospital must furnish each Medicare Member with an Important Message from Medicare (IM) upon admission (explaining appeals rights, should the Member disagree with the discharge) and reissue that IM by at least the day of discharge. If the Member appeals the discharge, Alignment, the delegated IPA/ Medical Group/Participating Provider Group, or the hospital may be financially responsible for the inpatient stay until a decision has been made by Livanta as to whether the discharge is appropriate. Prior to the issuance of the written IM, Alignment, the delegated IPA/Medical Group/Participating Provider Group, or the hospital must obtain the approval of the physician responsible for the inpatient care. The IM must include the Member's appeals rights. Failure to follow the above protocol may result in the delegated IPA/Medical Group/Participating Provider Group being responsible for the charges of the continued hospital stay until a valid IM is presented to the Member. If the Member appeals to either Livanta or to the Health Plan, then either Alignment or the delegated IPA/Medical Group/Participating Provider Group must provide a copy of the signed IM (or a certified letter with proof of delivery) and issue the detailed notification of discharge. To determine whether further inpatient hospital stay is medically necessary, the level of care required by the Member and the availability and appropriateness of other facilities and services must be considered. Copies of the Notice of Medicare Non-Coverage (NOMNC) are appended to this section as exhibits listed below.

Copies of the IM, NOMNC, Detailed Notice of Discharge (DND), and Detailed Explanation of Non-Coverage (DENC) letters should be faxed to Alignment or the Health Plan (see [Exhibit 1: Member Services](#)). For CMS- approved versions of these letters and for complete information regarding organization determinations, appeals, and grievances, refer to the [Appeals & Grievances](#) processes described in the Medicare Managed Care Manual at www.cms.gov.

14. Grijalva Final Rule Member Appeal Rights

Grijalva refers to *Grijalva v. Shalala* (see [Exhibit 10.3: Grijalva FAQs From CMS](#)), a class-action lawsuit that challenged the adequacy of the Medicare-managed-care appeals process. The plaintiffs claimed that beneficiaries in Medicare-managed-care plans were not given adequate notice and appeal rights when coverage of their health care services was denied or terminated. The Grijalva Rule regarding appeals rights became effective 4/23/2003. The requirements under this rule are as follows:

- The Member has the right to an immediate review of a "termination of skilled services" being provided in a skilled nursing facility (SNF), home health agency (HHA), or comprehensive outpatient rehabilitation facility (CORF) decision by an independent review body if the Member believes services should continue. CMS has designated Quality Improvement Organizations (QIOs) to conduct these fast-track reviews.
- SNFs/HHAs/CORFs are contractually required to issue the advanced written Notice of Medicare Non-Coverage (NOMNC) to all Medicare Advantage Members at least two (2) calendar days (or visits, in the case of home health agency) before the termination of a SNF, home health, and CORF services, with instructions on how to obtain a detailed notice and on how to file an appeal.
- Upon request, a specific and detailed explanation of why services are either no longer medically necessary or are no longer covered by Alignment or the Health Plan must be provided by Alignment, the delegated IPA/ Medical Group, or Participating Provider Group. Alignment can assist the Member by describing any applicable Medicare cover- age rule, policy, contract provision, or rationale upon which the termination decision was based in conjunction with the mandatory reporting requirements from CMS. Alignment has a billing requirement for all IPAs/Medical Groups/delegated Participating Provider Groups, and providers to include a copy of the regulatory NOMNC, including the Member's (or legal representative's) signed acknowledgment of receipt of the notice (or documentation of refusal to sign). Claims received without a copy of the notice and signed acknowledgment (or without documentation of an individual's refusal to sign the acknowledgment) will be considered incomplete. Participating Providers also are prohibited from balance-billing the Member for any covered services.



SECTION 10.1 NOTICE OF MEDICARE NON-COVERAGE (NOMNC)

Notice of Medicare Non-Coverage

Patient Name: xxxxxxxxxxxxxxxxxxxx

Patient Number: xxxxxxxxxxxxxxxxxxxx

The Effective Date Coverage of Your Current xxxxxxxxxxxxxxxx

Services Will End: xxxxxxxxxxxxxxxx

- Your Medicare provider and/or health plan have determined that Medicare probably will not pay for your current (insert type) services after the effective date indicated above.
- You may have to pay for any services you receive after the above date.

Your Right to Appeal This Decision

- You have the right to an immediate, independent medical review (appeal) of the decision to end Medicare coverage of these services. Your services will continue during the appeal.
- If you choose to appeal, the independent reviewer will ask for your opinion. The reviewer also will look at your medical records and/or other relevant information. You do not have to prepare anything in writing, but you have the right to do so if you wish.
- If you choose to appeal, you and the independent reviewer will each receive a copy of the detailed explanation about why your coverage for services should not continue. You will receive this detailed notice only after you request an appeal.
- If you choose to appeal and the independent reviewer agrees services should no longer be covered after the effective date indicated above.
- Neither Medicare nor your plan will pay for these services after that date.
- If you stop services no later than the effective date indicated above, you will avoid financial liability.



SECTION 10.2 DETAILED EXPLANATION OF NON-COVERAGE (DENC)

1100 W. Town and Country Road Suite 300
Orange, CA 92868
866-634-2247 (TTY 711)

Detailed Explanation of Non-Coverage

Date: [Month, DD, YYYY]

.....

Patient Name: [Member Name]

Patient Number: [Member ID]

.....

.....

This notice gives a detailed explanation of why your Medicare provider and/or health plan has determined that Medicare coverage for your current services should end. **This notice is not the decision on your appeal.** The decision on your appeal will come from your Quality Improvement Organization (QIO).

We have reviewed your case and decided that Medicare coverage of your current skilled nursing services should end.

- The facts used to make this decision
- Detailed explanation of why your current services are no longer covered, and the specific Medicare coverage rules and policy used in order to make this decision
- Plan policy, provision, or rationale used in making the decision (health plans only)

If you would like a copy of the policy or coverage guidelines used to make this decision, or a copy of the documents sent to your QIO, please call us at **866-634-2247 (TTY- 711)** or fax us at **323-201-5690**.

Form CMS-10124-DENC (Approved 12/31/2011) OMB Approval No. 0938-0953 Y0040_CMS_10124_DENC
File & Use 04072012



SECTION 10.3 GRIJALVA FAQs FROM CMS

Released by Centers for Medicare & Medicaid Services (CMS)

FREQUENTLY ASKED QUESTIONS on the GRIJALVA FAST-TRACK APPEALS PROCESS

(updated April 28, 2004)

The purpose of this document is to provide additional guidance on frequently asked questions (FAQs) received by CMS on the Medicare Advantage (MA) fast-track review process for terminations of Medicare-covered services in skilled nursing facilities (SNFs), home health agencies (HHAs) and comprehensive outpatient rehabilitation facilities (CORFs). We recognize that implementing these new procedures has been a challenge, and there is likely to be a need for further guidance as all parties continue to gain experience with the process. Thus, we intend to update the FAQs as frequently as experience and the volume of questions dictate. Previous FAQs have been updated as appropriate and are incorporated into this document; thus, these FAQs replace in their entirety the FAQs that were posted on Dec. 16, 2003.

Q1. Please verify whether the advance notice, the Notice of Medicare Non-Coverage (NOMNC), must be issued if the enrollee no longer requires skilled services in a SNF, but the Medicare Advantage (MA) organization authorized the enrollee to receive home health services subsequent to the discharge. Does this qualify as an end to the episode of care?

A1. The enrollee must receive an NOMNC preceding the conclusion of the SNF stay. The enrollee has the right to appeal being discharged from the SNF to home. At the end of the home health visits, the enrollee must receive an NOMNC for this separate episode of care ending.

Q2. Would you please clarify if the issuance of an Notice of Medicare Non-Coverage (NOMNC would be required for a single visit and, if so, can the notice be given during this first (and last) visit? I understand that the notice is not required if home care is not initiated, following an evaluation visit.

A2. In cases where the duration of services is for only one (1) visit, the NOMNC should be given during that visit. However, if that visit is strictly for evaluation purposes, and no services are initiated, then the NOMNC is not required.

Q3. Are notices required in situations involving the exhaustion of Medicare benefits?

A3. The Notice of Medicare Non-Coverage (NOMNC) is not required in this situation. Instead, as in the past, enrollees who disagree that they have exhausted their benefits should contact their Medicare Advantage (MA) organizations. MA organizations should treat such disagreements as requests for organization determinations and issue the Notice of Denial of Medical Coverage (NDMC), which provides information regarding appeals rights through the MA organization. Thus QIOs will not conduct expedited reviews in exhaustion of benefits situations.

Q4. If a patient agrees that services should end on the service termination date, is the provider still required to deliver the Notice of Medicare Non-Coverage (NOMNC) on behalf of the Medicare Advantage (MA) organization, have the patient sign the NOMNC, and submit the form to the MA organization?

A4. An MA enrollee must receive the NOMNC in all applicable situations, regardless of whether the enrollee agrees that services should end. Thus the provider must still deliver the notice and obtain the patient's signature. CMS does not require that the provider submit the signed form to the MA organization. However, providers should work with their respective MA organizations to determine where to maintain records that may be needed for review purposes.



Q5. Who is responsible for providing the Quality Improvement Organization (QIO) with the patient's medical records if a patient appeals to the QIO? The provider or the Medicare Advantage MA organization?

A5. Although the MA organization is, ultimately, responsible for providing records to the QIO, we recognize that the provider may be in a better position to promptly submit the needed records to the QIO. Thus providers and MA organizations must work cooperatively to ensure that the QIOs receive information needed in order to make a timely decision on the appeal.

Q6. CMS form No. 10095A states that an enrollee has the right to an immediate, independent medical review, while services continue, of the decision to end Medicare coverage. If a patient decides to appeal the discharge decision and requests that services continue pending the outcome of the appeal, who is financially responsible for the additional days of service? The patient, provider, or the Medicare Advantage (MA) organization?

A6. The Quality Improvement Organization's (QIO's) decision will determine whether the MA organization or the enrollee is financially responsible for the disputed days. To the extent that the termination date is upheld, the enrollee is responsible for services received after the effective date indicated on the termination notice. Disputes involving whether a provider or an MA organization bear financial responsibility for services that the QIO determines should be covered are not within the purview of the QIO.

Q7. Please confirm whether the Notice of Medicare Non-Coverage (NOMNC) and the Detailed Explanation of Non-Coverage (DENC) can be issued at the same time. By issuing the notices simultaneously, enrollees can fully be aware of the reasons why they are being discharged.

A7. The fast-track process requires delivery of only the NOMNC, unless the enrollee chooses to appeal the service termination. However, an Medicare Advantage organization may choose to issue the NOMNC and the DENC simultaneously, provided that the NOMNC advance delivery requirements are met. Note that the final version of the NOMNC includes additional space that can be used, at the discretion of the provider or the Plan, to include additional patient-specific information, including information about the reason for the discharge.

Q8. If an enrollee has been approved to receive services and meets his or her goals, e.g., for the specific purpose of rehabilitation, does the provider need to deliver the Notice of Medicare Non-Coverage?

A8. In this instance, the Medicare Advantage organization is simply discontinuing coverage/payment to the SNF as of the discharge date.

Q9. If the enrollee requires in-home services, does the situation change? If a provider delivers a Notice of Medicare Non-Coverage (NOMNC) to the enrollee, but the Medicare Advantage organization subsequently determines that services should continue beyond the original effective date, does the provider have to deliver a new NOMNC?

A9. The provider must inform the enrollee of the new effective date that coverage will end, either through delivery of a new NOMNC, delivery of an amended NOMNC, or through a mail or telephone contact. If the provider contacts the enrollee other than in person to deliver this information, the provider should annotate the original NOMNC to reflect the revised effective date that coverage will end, the date and time that the provider contacted the enrollee, and the name of the person who initiated the contact. The annotated NOMNC should be placed in the enrollee's medical file.



Q10. If an enrollee refuses continuation of services, does the enrollee have to fill out any form to indicate that he or she waives the right to the fast-track process?

A10. No form is required in this situation; although, the Medicare Advantage organization may wish to document this refusal.

Q11. Who can act on behalf of an incompetent enrollee? What is the process for delivering a Notice of Medicare Non-Coverage (NOMNC) if the enrollee is in a skilled nursing facility (SNF) but is not capable of receiving a notice?

A11. Where an Appointment of Representative form (CMS-1696-U4) has not been executed, an individual authorized under state law may be the authorized representative of the enrollee. State laws differ from one jurisdiction to another with respect to what is required to legally represent an incompetent enrollee. For example, some states have health care consent statutes providing for health care decision-making by surrogates on behalf of patients who lack advance directives and guardians. Other states have laws that grant authority to individuals with durable powers of attorney. In an emergency, a disinterested third party, such as a public guardianship agency, may be an authorized representative, e.g., where the beneficiary's inability to act has arisen suddenly (e.g., a medical emergency, a traumatic accident, an emotionally traumatic incident, disabling drug interaction, stroke), and there is no one who genuinely can be considered as the beneficiary's choice as his or her authorized representative. Thus the SNF should deliver the NOMNC to the individual authorized under state law to make health care decisions on behalf of the enrollee.

Q12. Can a family member who has been involved in the enrollee's care act as the authorized representative without having signed the Appointment of Representative form (CMS-1696-U4)?

A12. Family members that do not fill out an Authorized Representative form, CMS-1696-U4, must act under arrangements provided under state law. Individuals appointed or designated under state statutes may act as authorized representatives.

Q13. Our Durable Medical Equipment (DME) authorization letter to the patient and provider has start and end dates. Will this satisfy the two-day notification?

A13. The fast-track appeals process does not apply to DME suppliers. However, in any situation where the expedited review process is available, the Notice of Medicare Non-Coverage is the only appropriate notice.

Q14. Please clarify how to calculate the delivery of the Notice of Medicare Non-Coverage (NOMNC). It is unclear which date should be inserted on the NOMNC. CMS' education material sometimes uses the terms "discharge date" and "last covered day" interchangeably.

A14. We recognize that the terminology can be confusing, particularly in the SNF setting, where the day of discharge often is not a "billed" day. However, regardless of how days are billed, "Medicare-covered services" continue until the moment of discharge. Thus the day of discharge constitutes the "effective date" of the service termination.



SECTION 11 CLINICAL PROGRAMS AND MEMBER RESOURCES

Overview

Alignment provides a range of clinical programs and Member resources to supplement the care that Members receive through their network providers. Alignment Providers work alongside the Member's PCP to develop a care plan that puts Member's needs first. To refer a Member to an Alignment clinical program, a referral is required. Referral criteria and instructions are attached as [Exhibit 11.2](#).

1. Comprehensive Annual Health Assessment

The Comprehensive Annual Health Assessment is an in-depth review of a Member's health conditions to assist in identifying chronic diseases, modifiable risk factors, and urgent health needs. Complementing a Member's routine visit to the PCP, the Comprehensive Annual Health Assessment provides a holistic approach to caring for our Members to ensure that all acute, chronic, and preventative care needs are addressed. This enables Alignment to collect comprehensive psychosocial and health status information for medical record integration through AVA®. Alignment encourages Members to complete an initial health-risk assessment within the first 90 days of enrollment and annually thereafter. Depending on the specific contractual agreement, Alignment may conduct this assessment in the Member's home, in an Alignment care center, via telehealth (virtual video visit), or may delegate the function to the IPA/Medical Group or PCP to complete as an **Annual Wellness Visit**, compliant with CMS requirements. This service applies only to PCPs and does not include services provided in any other settings.

2. Care Anywhere High-Risk Member Management Program

The Care Anywhere program is a physician-led, Advanced Practice Clinician (APC)-driven model of care designed to support patients that have been deemed frail or chronically ill and who would benefit from a comprehensive medical, functional, and social-needs assessment and ongoing care to address immediate, chronic, and social health care needs. The Care Anywhere program aims to offer a set of clinical and social interventions designed to reduce preventable emergency room utilization, hospitalizations, undesired or unnecessary treatments, and overall cost of care while providing patient-centered care aimed at addressing short- and long-term medical and social-care needs. The Care Anywhere program targets the top 10 percent of frail or chronically ill Members who account for a disproportionate amount of health expense, primarily through the utilization of emergency rooms (ER) and inpatient hospital services. The program delivers an extra layer of care for targeted Members to not only reduce the unnecessary utilization of ER and inpatient services, but also to improve health outcomes and restore humanity in advanced-care planning. During the initial face-to-face or CMS-compliant telehealth visit, the APC assesses the comprehensive health and psychosocial needs of a Member and builds an appropriate care plan, including frequency of follow-up visits. The program works alongside the Member's PCP and existing care team to ensure that the Member's care is coordinated, and that the Member is receiving his/her treatments as prescribed. Once enrolled, Members have access to an interdisciplinary care team, which includes an Alignment physician, nurse practitioners, physician assistants, registered nurses, social workers, behavioral health specialists, pharmacists, and health coaches to address any care needs the Member may have, including any potential acute health needs, provider referrals, open care gaps, or medication compliance. For those Members in the advanced stages of their care journey, the program provides Members and their families high-quality, compassionate care when a cure may not be possible. This includes palliative care services and hospice care referrals as determined in conjunction with the Member and his/her Alignment provider. Depending on the specific contractual agreement, Alignment may conduct this assessment in a patient's home, via a telehealth appointment, or in an Alignment Healthcare Center or may delegate the function to the Participating Provider.



3. Case Management

Alignment's case management programs incorporate the dynamic processes of assessment, problem identification, care planning, intervention, monitoring, and evaluation. The programs use an interdisciplinary team approach to meet the Member's health care needs.

Members who are identified for case management and agree to participate will be assessed for needs when the case is initially opened. Upon completion of the initial assessment, the case will be assigned to the appropriate level of case management based on the Member's needs. Communication and collaboration will occur with the PCP and the IPA/ Medical Group or Participating Provider Groups, as needed, as well as with any specialty-care Participating Providers that may be involved in the Member's care. The Member and family, as appropriate, will be actively involved in the care plan, which will be documented and updated on a periodic basis or when there is a change in health status. Both short-term and long-term goals will be formulated, and the Member's progress toward those goals will be monitored. Outcomes are documented when the case is closed, and Member satisfaction with the case management process will be assessed periodically. All pertinent information is relayed in a timely manner to the PCP and the IPA/Medical Group or Participating Provider Groups, as necessary, throughout the case-management process.

IPAs/Medical Groups or Participating Provider Groups that are delegated for General, Post-Discharge/Transitions, Complex, and/or Disease Management programs will be monitored for their compliance to the program criteria listed above as well as their compliance with meeting the Care quality measures outlined below.

IPAs/Medical Groups or Participating Provider Groups that are not delegated for Complex Case Management (CCM) or Telephonic Disease Management (TDM) can refer Members using the referral form in [Exhibit 11.2](#).

Alignment and/or its delegates offer the following telephonic case management programs for Members at risk of poor health outcomes:

- General Case Management
- Post-Discharge/Transitions of Care Case Management
- Complex Case Management
- Telephonic Disease Management

General Case Management is a collaborative, Member-centered process of assessment, care planning, care coordination, health education, and advocacy to reduce or eliminate barriers to care. The assigned Case Manager works directly with the Member and the family/caregiver(s) to develop _____ an Individualized Care Plan (ICP) that is focused on increasing access to resources and services that support the Members health needs. The Case Manager is responsible for coordinating benefits and services with other agencies/ providers, monitoring progress, and ensuring interventions are in place to support the Member's Individualized Care Plan.



Post-Discharge and Transitions of Care Case Management is a subset of the General Case Management program. This program focuses on those Members discharged from a facility (inpatient/emergency/post-acute care) and provides timely education and assistance with access to care and services, with the goal of preventing unnecessary readmissions. Critical elements of the transitions of care the Case Manager will complete a transitions of care assessment that includes but is not limited to the following:

Completion of the HEDIS quality-of-care measures, including but not limited to:

- Medication review and medication reconciliation (MRP)
- Transitions of Care measures (TRC)
- Follow-up after emergency department visits for people with multiple high-risk chronic conditions (FMC)
- Access to care – Facilitating a transitions/post discharge visit with a provider or specialist
- Verify that ordered services are in place (e.g., home health care, durable medical equipment, and prescriptions)
- Readmission prevention
- Reinforce understanding of discharge instructions
- Member education on symptom management
- Education regarding a PCP visit
- Ensure family/caregiver support is in place
- Identify any ongoing coordination-of-care needs for referral to Telephonic Disease Management, General Case Management, or Complex Case Management

IPAs/Medical Groups or Participating Provider Groups that are delegated for Post Discharge/Transitions of Care are expected to ensure that members who are discharged from any inpatient Hospital unit, skilled nursing facility, or seen in an emergency room are contacted by/or seen by a Provider within a one hundred sixty eight (168) hour period following such discharge, and such interaction between Provider and member is supported by the Provider members' medical records and associated Encounter Data to include completion of the TRC and FMC required measures.

Complex Case Management (CCM) is provided to Members who have experienced a critical event or diagnosis that requires extensive use of resources and requires oversight to navigate the needed delivery of care and services. Case management becomes complex when the illness and/or conditions and complexity are severe and require an intense level of management beyond that of General Case Management. Referral criteria can be found in [Exhibit 11.1: Complex Case Management and Telephonic Disease Management Criteria](#).

Telephonic Disease Management (TDM) is a system of coordinated health care interventions and communications for defined patient populations with conditions where self-care efforts can be implemented to manage the conditions and to prevent complications. Alignment's TDM program is designed to help Members and practitioners manage chronic conditions, including diabetes, chronic kidney disease (CKD)/End-Stage Renal Disease (ESRD), coronary artery disease (CAD), heart failure (HF), chronic obstructive pulmonary disease (COPD), and hypertension (HTN). Referral criteria can be found in [Exhibit 11.1: Complex Case Management and Telephonic Disease Management Criteria](#).



4. Virtual Care Center:

Alignment's 24/7 Virtual Care Center (VCC) offers access to a clinician or other healthcare professional for urgent or acute healthcare needs. This service is available to all Alignment members regardless of the PCP or IPA affiliation 24 hours a day, 7 days a week including holidays. VCC clinicians use AVA to support clinical decision making for any member calling and all clinical notes are faxed to the primary care physician office within 72 hours of the visit. Members can utilize VCC for acute symptoms, needing medical advice, medication refills for routine chronic medications, social work needs or to help with care coordination activities. Members may access this service using Alignments ACCESS ON DEMAND phone number and visits are available via telephone or video.



SECTION 11.1 COMPLEX CASE MANAGEMENT AND TELEPHONIC DISEASE MANAGEMENT CRITERIA

Any Member identified with a diagnosis listed below should be referred to Alignment for review and consideration to be included in the Complex Case Management or Telephonic Disease Management program if the program is not delegated.

Complex Case Management (CCM) Criteria:

- Members followed in General Case Management for more than sixty (60) days
- Special Needs Plan (SNP) Members
- Traumatic brain injury
- Major organ transplant
- Spinal injuries
- Four or more chronic conditions
- Cancer – active treatment
- Complex behavioral health issues
- Complex social issues
- Neurological impairments (ALS, Parkinson's, etc.)
- Other

Telephonic Disease Management (TDM) Criteria:

- Diabetes
- Chronic kidney disease (CKD) / End-stage renal disease (ESRD)
- Coronary artery disease (CAD)
- Hypertension (HTN)
- Heart Failure (HF)
- Chronic Obstructive Pulmonary Disease (COPD)



SECTION 11.2 CLINICAL PROGRAMS REFERRAL FORM



Patient Last Name	Patient First Name	Patient Middle Name
Patient DOB	Patient Plan ID	Patient Home or Cell Phone
Patient Provider Name	Patient Type	Patient Phone
Provider Email		Provider Fax

Please check all that apply to this Member:

- | | |
|--|--|
| <input type="checkbox"/> 15 prescription medications identified in HAV visit | <input type="checkbox"/> Evaluation for referral to hospice needed |
| <input type="checkbox"/> Active cancer/chemotherapy | <input type="checkbox"/> Feeding tubes |
| <input type="checkbox"/> Advanced care planning discussion needed | <input type="checkbox"/> Frequent ER utilization (2 or more visits in last 6 months) |
| <input type="checkbox"/> Advanced wound care assessment/planning needed | <input type="checkbox"/> High risk for readmission |
| <input type="checkbox"/> CHF (NYHA stage III and IV) | <input type="checkbox"/> Hoyer lift |
| <input type="checkbox"/> CKD stage IV or greater | <input type="checkbox"/> Hypertension (uncontrolled, >160 systolic) |
| <input type="checkbox"/> CKD>4 and not interested in pursuing dialysis | <input type="checkbox"/> Liver disease with ascites |
| <input type="checkbox"/> Complex psychosocial or symptom management needed | <input type="checkbox"/> Member is homebound/bedbound or institutionalized, or at risk of either |
| <input type="checkbox"/> COPD (Gold stage III, IV) | <input type="checkbox"/> Paraplegic/quadruplegia |
| <input type="checkbox"/> Dementia with functional decline, Parkinson's, CVA with inability to maintain caloric intake or hydration, ALS, or MS | <input type="checkbox"/> Progression of cancer or metastasis |
| <input type="checkbox"/> Dialysis | <input type="checkbox"/> Two falls in the last 6 months |
| <input type="checkbox"/> DM2 (HbA1c>9.0, hypoglycemic episodes, or new to insulin) resulting in an admission | <input type="checkbox"/> |

***The Alignment Healthcare Clinical team will review all referrals and route to the appropriate care intervention team based on referral criteria and internal risk score Intervention teams include:**

- Care Anywhere Home-based High-risk Program
- Telephonic Case Management

You may refer members by phone or secure email: should be: 833-902-1665 or careanywherecoordination@ahcusa.com



SECTION 12 SPECIAL NEEDS PLAN

Overview

Alignment identifies, supports, and engages with our most vulnerable Members at any point in their health care continuum, striving to assist in achieving an improved health status. Alignment provides services in a Member-centric fashion by offering both a Chronic Special Needs Plan (C-SNP) and a Dual-Eligible Special Needs Plan (D-SNP) to eligible Members in California, Nevada, North Carolina, Arizona, Florida and Texas through Alignment Health Plan. Alignment's objectives for serving Members with complex and special needs include but are not limited to:

- Completion of an annual population assessment to identify the needs of the population and subpopulations, so that Care Management processes and resources can be updated to address the Members' needs.
- Promotion of preventative health services and the management of chronic diseases through disease management programs that encourage the use of services to decrease future morbidity and mortality in Members.
- Conducting comprehensive assessments that identify the Members' needs and barriers to care.
- Coordination of transitions of care for Members with complex and special needs in order to assist in navigating the complex health care system and accessing Provider, public, and private community-based resources.
- Improvement of access to primary and specialty care for Members with complex health conditions, so they receive appropriate services.
- Consultation with appropriate specialized health care personnel when needed, such as with medical directors, pharmacists, social workers, and behavioral health professionals.
- Ensuring that the Members' socioeconomic barriers are addressed.

The Special Needs Plan (SNP) Model of Care Program's effectiveness is evaluated by Alignment through the identification of objective, measurable, and population-specific quality indicators. Performance outcomes for each special needs plan have been established to evaluate and measure quality of care, quality outcomes, service, and access for Members. For each metric, benchmarks have been established using evidence-based medicine found in current literature, standards, and guidelines. Root cause analysis is conducted, and interventions are identified for each indicator that fell below the desired value. The analysis, process improvement plan, and implementation of interventions and improvements will be reported to the Quality Improvement Committee (QIC) for review, feedback, and approval.

1. Special Needs Plan Summaries

Chronic Special Needs Plan (C-SNP)

For the Alignment Health Plan Heart & Diabetes (HMO C-SNP), Members with confirmed chronic heart failure, cardiovascular diagnosis of cardiac arrhythmias, coronary artery disease or peripheral vascular disease, diabetes mellitus, and/or chronic venous thromboembolic disorder and living in a qualifying state and county may enroll in this Plan.

For the Alignment Health Plan ESRD Balance (HMO C-SNP), Members with confirmed End-Stage Renal Disease on dialysis and living in a qualifying state and county may enroll in this Plan.

PCPs are required to verify the chronic condition upon the Member's enrollment into the C-SNP.



Dual-Eligible Special Needs Plan (D-SNP)

For Alignment Health Plan D-SNP, Members eligible for both Medicare and Medicaid and living in a qualifying state and county may enroll in this Plan.

Alignment's plan is a standard D-SNP, so Alignment does not provide Medicaid services but coordinates such services with the Member's Medicaid plan or the state. A Member is required to maintain dual eligibility in order to remain enrolled in this Plan.

Refer to [Exhibit 2.1: Alignment Health Plan 2023 Product Offerings](#) for the list of qualifying states and counties.

2. SNP Program Requirements

Participating Providers are expected to participate in the SNP program to help manage and improve Members' health outcomes. Ways in which Participating Providers can help our Members include:

- Complete the credentialing and recredentialing process
- Participate in Alignment's Annual SNP Model of Care Training
- Attentive Responses with Alignment's Requests for Information Related to Member's Complaints, Quality Concerns and Medical Record Review Assess/reassess the Member to identify health status changes and update his/her Individualized Care Plan (ICP) as needed
- Review and discuss the ICP with our Members
- Communicate with the Alignment Interdisciplinary Care Team to ensure coordination of care and transition of care for our Members
- Refer Members to Alignment Care Management for care coordination

3. SNP Chronic Condition Improvement Projects (CCIPs)

As required by regulation, each Medicare Advantage organization must develop and implement a CCIP as part of its required Quality Program and SNP program. A CCIP is a clinically focused initiative designed to improve the health of a specific group of Members with chronic conditions.

The CCIP initiative requires a focus on promoting effective management of chronic disease for a three-year cycle. The Quality Management staff may contact Providers regarding various CCIP initiatives.

4. Model of Care

The SNP Model of Care (MOC) is considered a vital quality improvement tool and integral component for ensuring that the unique needs of each Member enrolled in a SNP are identified and addressed. The MOC adheres to the CMS clinical and non-clinical standards and elements.

The MOC targets the population and identifies specific specialties needs so resources and services are available to those who need them. Effectiveness of the MOC is evaluated through specific measurable goals and population specific quality indicators. Indicator data is collected on a routine and ad hoc basis, outcomes analyzed, interventions implemented for goal attainment and reports generated. Data collection follows protocols established in approved polices on program design.

The MOC Document outlines the specific program requirements and process that is approved and implemented for Alignment SNP Members.



Alignment's policy is to comply with CMS requirements for Medicare Advantage (MA) SNP plans to conduct initial and annual MOC training for applicable employed and contracted staff and Practitioners/Providers.

5. SNP Model of Care Training

All Participating Providers contracted with Alignment and who provide care to Alignment SNP Members are required to complete Alignment's Special Needs Program (SNP) and Model of Care (MOC) Provider Training within the first sixty (60) days of the contract effective date and annually thereafter. This helps Alignment ensure that SNP Members are managed in accordance with Alignment's Model of Care.

Participating Providers can complete the required SNP MOC Provider training by visiting Alignment Health Plan's Provider page (see [Exhibit 1: General Resources](#)) and following instructions for electronically signing the required attestation and for submitting it to the Quality Management Department.

6. Care Transitions

When a Member has a care transition, the PCP is responsible for responding to requests for information from Alignment, ensuring that Alignment receives admission and discharge notification in the electronic medical record system, and for working with the Alignment Care Manager and Members of the Interdisciplinary Care Team to facilitate needed services. In addition, the PCP is responsible for evaluating the Member as soon as possible after an inpatient discharge, completing the medication reconciliation; and reviewing, updating, and discussing the Individualized Care Plan with the Member.

7. Oversight Responsibility

Oversight of the Special Needs Models of Care programs is retained by Alignment and is not a delegated function. While providers are expected to cooperate with C-SNP and D-SNP related improvement initiatives, the overall management and outcome of the Models of Care will be the responsibility of Alignment.

8. Nondiscrimination

Providers shall not unlawfully discriminate against Members eligible for D-SNP enrollment. Discrimination may include, but is not limited to, the following:

- Denying any Member any Covered Services.
- Providing to a Member any Covered Service that is different or provided in a different manner or at a different time from that provided to other Members within the Health Plan, except where medically indicated.
- Subjecting a Member to segregation or separate treatment in any manner related to the receipt of any Covered Service.
- Restricting a Member in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any Covered Service; treating a Member or a beneficiary eligible for enrollment into the Health Plan's D-SNP differently from others in determining whether he or she satisfies any admission, enrollment, quota, eligibility, membership, or other requirement or condition that individuals must meet in order to be provided any Covered Service.
- The assignment of times or places for the provision of services on the basis of the sex, race, color, religion, ancestry, national origin, creed, ethnic group identification, age, mental disability, physical disability, medical condition, genetic information, marital status, gender, gender identity, sexual orientation, or identification with any other persons or groups defined in Penal Code 422.56.



- Failing to make auxiliary aids available; or failing to make reasonable accommodations in policies, practices, or procedures, when necessary to avoid discrimination on the basis of a disability.
- Failing to ensure meaningful access to programs and activities for limited English proficient (LEP) Members and potential enrollees.

Providers shall take affirmative action to ensure that Members are provided Covered Services without regard to items aforementioned, except as needed in order to provide equal access to limited English proficient (LEP) Members or Members with disabilities or as where medically indicated.

For the purposes of this section, a physical handicap includes the carrying of a gene that may, under some circumstances, be associated with a disability in that person's offspring but that causes no adverse effects on the carrier. Such genes will include, but are not limited to, Tay-Sachs trait, sickle cell trait, thalassemia trait, and X-linked hemophilia.

9. Qualified Medicare Beneficiary (QMB) - D-SNP Only

Federal law prohibits all Medicare providers from billing dual-eligible Qualified Medicare Beneficiary (QMB) Members for Medicare deductibles, copayments, and coinsurance. The QMB program assists low-income Medicare beneficiaries with their Medicare Part A and Part B premiums and cost-sharing. All Medicare and Medicaid payments received by the Participating Providers for furnishing services to a QMB are considered payment in full. IPAs/Medical Groups or Participating Providers may request payment for these premiums and cost-sharing amounts from the state. Participating Providers are responsible for educating their staff on the importance of checking a patient's QMB status before billing for any deductibles, copayments, and coinsurance. Use AVA[®] to verify QMB status or call Alignment Eligibility (see [Exhibit 1: Eligibility](#)). As an additional resource, the IPAs/Medical Groups will receive, via SFTP, the aforementioned QMB report each month from Alignment. This report can be used to identify QMB Members. For information on Medicare billing restrictions, see [Medicare Learning Network](#).



SECTION 13 MEDICAL MANAGEMENT/UTILIZATION MANAGEMENT

Overview

The purpose of the Utilization Management (UM) program is to ensure consistent delivery of quality inpatient and outpatient health care services with optimal Member outcomes, as well as to provide and manage coordinated, comprehensive, and quality health care within the service area, without discrimination toward any individual and in a culturally competent manner. The UM program will be in accordance with CMS, state, and accreditation agency requirements

1. Separation of Medical Decisions and Financial Concerns

The UM program for IPAs/Medical Groups and delegated Participating Provider Groups must include provisions to ensure that financial and administrative concerns do not impact UM decisions. Alignment monitors compliance with this requirement. Failure to comply may result in the withdrawal of the delegated UM from an IPA/Medical Group/delegated Participating Provider Group and, ultimately, termination of its Alignment agreements.

2. Financial Incentive

During the course of Medical Services Committee activities, there may be incidents during which a UM decision is made and results in a denial or in recommendation of denial of services. The Medical Services Committee Members are not incentivized or reimbursed for adverse decisions relating to UM decisions. The UM decision is independent and impartial and is solely based on appropriateness of care and service and existence of coverage.

3. Utilization Management Goal

Participating Providers must have the designated items in place when UM is delegated. When not delegated, Alignment manages the responsibility of these items:

UM Committee

Delegated or risk-bearing Participating Providers are required to have a UM Committee that meets no less than quarterly, and more frequently if necessary. The UM Committee's purpose and responsibilities should be written and on file. The Committee minutes should be on file and made available to Alignment upon request.

Prospective Review Process

Prospective review is performed to determine the medical necessity of elective referrals to specialty or ancillary care, inpatient admissions, and/or outpatient procedures. Requests for preauthorization of elective referrals, admissions, or procedures are received by the Participating Provider from either the Primary Care Provider or specialist and will be approved or denied based on medical necessity. The delegated Participating Provider determines medical necessity using standardized criteria.

The UM staff (physician and nonphysician reviewers) use standardized review criteria to ensure consistency of decision-making. This includes determining the appropriate level of care and initiating discharge planning. Concurrent review is required on an ongoing basis. Once an acute level of care is determined to no longer be medically necessary, the Alignment or delegated UM staff will review the clinical information with the Medical Director. The hospital UM staff will also be notified that the continued stay is under review.



For delegated Participating Providers, the Medical Director or Alignment staff may call the attending physician (or the case manager will call the hospital case manager) to discuss alternatives. If he/she agrees with the determination, the Member will be either discharged home or transferred to a lower level-of-care setting. The Alignment staff or delegated group will coordinate the transfer and make arrangements for discharge services.

Concurrent Review Process

The objective of concurrent review is to evaluate clinical information during a Member's hospitalization, perform discharge planning, and assist in determining medical necessity at an appropriate level-of-care setting, along with Quality Improvement screening. The hospital is required to notify Alignment UM staff within 24 hours of admission whenever a Member is admitted. Participating Providers may call the number shown in [Exhibit 1: Utilization Management All Admission Notifications](#). A completed admission cover sheet should be faxed as soon as possible to the fax number shown in [Exhibit 1: Utilization Management](#).

Appropriately licensed professionals will conduct concurrent reviews on all hospitalized Members. Reviews will include hospital clinical documentation, physician's communication, telephonic review, and ongoing communication with other health care professionals involved in the Member's care. Approved criteria for justifying medically appropriate services and length of stay will be applied and documented. Care will not be discontinued until the Member's treating provider has been notified of the decision and a care plan that is appropriate for the medical needs of the Member has been agreed upon by the treating provider. The discharge-planning process will be initiated at the time of the Member's admission and will be an integral part of managing the Member's care. The Member's progress will be closely monitored and evaluated in order to plan for a timely discharge from the hospital.

Members who are discharged from any inpatient Hospital unit or skilled nursing facility are to be seen seven (7) days following such discharge and such interaction between the provider and Member must be documented in the Member's medical record and submitted to Alignment via the encounter or claim.

Retrospective Review Process

Alignment's UM Department conducts retrospective reviews for medical necessity for all initial requests for authorization of care or services that have been rendered without prior authorization. The Claims Department is responsible for initial receipt and handling of retrospective authorizations/claims payment requests. Upon receipt of a claim requesting payment for services already rendered, the Claims Department staff determines whether adequate supporting documentation is available.

Not all services require prior authorization; however, if a circumstance exists in which a retrospective review is warranted, retrospective review includes two components: retro-authorization request review and retrospective utilization review.

Retro-authorization request reviews are performed when medical services were provided without obtaining prior authorization. Retro-authorization requests will be considered for authorization only under certain circumstances.

Retrospective utilization reviews include the review of a provider's referral patterns, appropriateness of referrals, and procedures. The information is collected and analyzed on a regular basis, at least annually. After conducting the retrospective utilization review, the provider may be placed on focus review on a prospective basis to determine the future appropriateness and medical necessity of requested services.

The delegated Participating Provider shall conduct retrospective reviews on individual cases and on aggregate decision data. Individual case reviews help identify specific issues arising from an episode of care; for example, ER claims are reviewed for medical necessity and covered benefits.



Case Management

The delegated Participating Provider shall proactively assess, plan, implement, and coordinate care across the continuum of care needs, as well as monitor, evaluate options, and refer Members to programs to meet Members' needs to promote quality cost-effective outcomes.

4. Delegation of Utilization Management

Alignment maintains accountability for the delivery of care and services to its Members when services are delegated to the IPA/Medical Group or delegated to a Participating Provider Group. Alignment's UM program requires that delegated IPAs/Medical Groups and delegated Participating Providers have a UM program in place to monitor and evaluate the care and services provided to its Members. The IPA's/Medical Group's and delegated Participating Provider Group's UM program must meet Alignment, state, and federal requirements. Alignment will perform systematic monitoring and oversight of all IPAs/Medical Groups and delegated Participating Provider Groups and the oversight of their respective provider networks to ensure compliance with contractual and regulatory requirements. Oversight of utilization practices is conducted through Alignment's Compliance Delegation Oversight Department. Alignment conducts annual and ongoing assessments of delegated activities that include QM and UM activities.

5. Delegated Participating Provider Group's Utilization Management Program

In addition to the key components listed above, those Participating Provider Groups with delegated responsibilities for utilization management are required to have a written UM program that documents all facets of delegated authority. All decisions regarding the approval or denial of health care services under delegation are made in accordance with the IPA/Medical Group/delegated Participating Provider Group UM program, which includes a UM Committee review process. The UM program should specify the medical criteria and process used to determine medical necessity.

The IPA/Medical Group/delegated Participating Provider Group's UM program and work plan will be evaluated annually by Alignment to determine compliance with Alignment standards. The IPA/Medical Group/delegated Participating Provider Group UM program and work plan must also be approved by the governing body of the IPA/Medical Group/delegated Participating Provider Group on an annual basis, with such approval documented and signed in the minutes. An IPA/Medical Group/delegated Participating

Provider Group's UM program should provide evidence that internal procedures for UM are operational and include but are not limited to the following:

- A specific person/position designated to ensure necessary authorization procedures are performed; minimum experience required for this designee is that of a licensed vocational nurse.
- Authorization for elective and urgent health care services meet established standards.
- Physician involvement and collaboration for medical necessity determinations occur daily.
- A summary of utilization activities to be reviewed by the IPA/Medical Group/delegated Participating Provider Group UM Committee.
- Documentation of UM that includes the decision and Member notification. In the case of a denial, an alternative treatment plan and information on the Member's right to appeal must be included.
- Timely, documented referral determination and Member notification outcomes.
- Daily logs of hospital admissions and denials/appeals, which must be maintained and available upon request to Alignment staff for review purposes.
- Cooperation with Alignment's UM department for all Out-of-Area admissions.



- In accordance with CMS requirements, the IPA/Medical Group/delegated Participating Provider Group shall provide valid and reliable encounter data in a timely manner and comply with the Alignment UM program. The encounter data system assists in tracking and trending utilization patterns across the Alignment provider network.
- Reporting and analysis, including, at a minimum, the following information:
 - Pre-service determinations (including denials)
 - Bed days/1,000; admits; length of stay; level of care (monthly, quarterly, and annually)
 - Behavioral health statistics/1,000; admits; length of stay; level of care (monthly, quarterly, and annually)
 - All outliers will require a Corrective Action Plan for the UM indicator
- Specific written procedures for precertification, concurrent and retrospective review, and case management that is supervised by qualified medical professionals and physician consultants representing the appropriate specialty of medicine and surgery.
- A UM Committee, composed of Participating Providers that make determinations regarding the approval or denial of health care services to Members.
- A UM program and policies and procedures that specifically outline Member/Participating Provider notifications of medically necessary determinations, including approvals and denials. The denial process must be clearly outlined and include a process for appeals. A denial and/or appeals policy and procedures and Member letters that include specific regulatory language that clearly indicates the reason for the denial, alternative treatment suggestions as appropriate, and how the Member can appeal directly to Alignment. (Alignment does not delegate the appeals process; therefore, IPAs/Medical Groups/delegated Participating Provider Groups need to define their role in an appropriate and timely notification to Alignment.) Only a licensed physician can deny services based on medical necessity.
- Utilization of evidence-based clinical criteria for UM medical review criteria (e.g., CMS National and Local Coverage Determinations, Milliman Care Guidelines®, Apollo® Managed Care's medical review criteria and guidelines) that ensures reliable and consistent medical-necessity determinations for all individuals involved in the utilization process. All criteria and guidelines are to be clearly documented.
- Case management cases that are reported to Alignment staff at the point of identification.
- Assistance with the identification of coordination of benefits and third-party payer information.
- Participation with Alignment in Joint Operations Meetings annually, or more frequently, as indicated.
- Administration of Member benefits based on the Alignment Member's individual benefits schedule.
- IPA/Medical Group/delegated Participating Provider Group representatives that participate in Alignment medical management committees, as requested.

Failure of the IPA/Medical Group/delegated Participating Provider Group to meet under-utilization and overutilization standards will result in the development of a CAP that is submitted to Alignment for review and approval.

The IPA/Medical Group/delegated Participating Provider Group is responsible for the timely submission of monthly, quarterly, and annual reporting, as listed in [Section 5: Delegation Oversight](#).



6. Timeliness Requirements for Utilization Review Decisions

Alignment, and Alignment's Participating Providers who have been delegated by Alignment for UM, are required to comply with the utilization management decisions.

Alignment's Health Care Services Department, the Medical Director and the Utilization Management Committee shall provide decisions within the time frames required by Alignment, accreditation, and state and federal legislation. Alignment has adopted the Industry Collaborative Effort (ICE) recommendations as its decision-timeliness standard.

Initial Organization Determination

An initial determination is made when either Alignment or the delegated Participating Provider approves or denies payment on a service rendered or has failed to authorize or provide a service. For Part C service requests, Alignment must make an initial decision on a request for a service as quickly as the Member's health permits but no later than 14 calendar days from the date of receipt of the request, or 72 hours from the date and time of receipt of the request when an urgent situation exists and the need for an expedited determination is deemed medically necessary as defined by CMS.

Requests for Part B drugs, including Part B drugs subject to step therapy, must be processed under the same time frames as used in the Part D drug program. This includes time frames for standard organization determinations 72 hours from the date and time of receipt and 24 hours for expedited organization determinations from the date and time of receipt when an urgent situation exists. Standard Part B drug reconsiderations determinations will be made within 7 days and expedited reconsiderations within 72 hours.

If the reviewer is unable to make a determination using the clinical criteria and treatment guidelines, the reviewer will forward the request to the designated physician reviewer or to the Medical Director for a determination. Only licensed physicians may make adverse medical necessity determinations and apply the status of denial to the referral or request.

If the delegated IPA/Medical Group/Participating Provider Group is unable to provide Covered is unable to provide Covered Services in the time frames required by CMS for the appropriate coordination of care for Members, Alignment may arrange for such needed covered services with another provider. In such cases, the delegated IPA/Medical Group/Participating Provider Group may be responsible for reimbursing Alignment for any costs it has incurred as a result, or Alignment may have the right to recoup such costs from the IPA's/Medical Group's/Participating Provider Group's capitation payments or other compensation.

Oversight and monitoring of the delegated IPA/Medical Group/Participating Provider Group operations includes annual review and approval of the written description of the UM program, monitoring of denial activity, compliance with Alignment criteria, compliance with the approval and denial decision timeliness standards that are based on regulatory requirements, and compliance with appeal decision standards.

Alignment is to ensure appropriate utilization of covered services and benefits; establish a process to track, trend, and analyze utilization activity; and implement appropriate interventions upon identification of under and overutilization patterns. CMS requires that every Medicare Advantage Prescription Drug plan have a utilization management program that has mechanisms in effect to detect both underutilization and overutilization of services and that does not structure utilization management activities so that they provide inappropriate incentives for denial, limitation, or discontinuation of authorized services.



7. Authorization and Denial Log Submissions

All delegated Participating Providers, regardless of contractual risk arrangements, are required to submit weekly authorization and denial logs for all services when an authorization is required for such services by either the IPA/Medical Group/delegated Participating Provider Group or Alignment.

8. Clinical Criteria for Utilization Management and Case Management Decisions

Evidence-based clinical criteria for UM and case management is used to determine medical appropriateness. In addition to utilizing CMS National and Local Coverage Determinations, other examples of criteria that should be used include InterQual®, Milliman Care Guidelines, and/or Apollo Guidelines. Participating Provider Groups with delegated responsibilities are required to use these types of standardized UM criteria for decision-making.

9. Hospital Admission Notification

Alignment requires notification of all elective, urgent, and emergency admissions, regardless of whether the services are in or out of the service area, within twenty-four (24) hours of an admission and when Alignment is or may be at risk for the hospital services. Participating Providers call notify Alignment by calling the number in

[Exhibit 1: Utilization Management](#)

Hospital-based treatment due to an emergent condition do not require authorization prior to the service(s) being rendered.

For HMO Plans Members, unless otherwise authorized by Alignment, elective hospital, and hospital services are required to be provided by participating hospitals that are contracted with Alignment when such services are Alignment's financial responsibility. Should this not occur, the Participating Provider may be held responsible. Lack of notification will prevent proper evaluation of medical necessity and may result in authorization and/or claims payment discrepancy.

10. Outpatient Hospital Observation

Alignment requires notification of all elective, urgent, and emergency observation stays, regardless of whether the services are in or out of the service area, within twenty-four (24) hours of an admission and when Alignment is or may be at risk for the hospital services. Should this not occur, the Participating Provider may be held responsible. A Member's outpatient hospital observation status may later change to an inpatient admission if the criteria are met. Hospitals are expected to bill the appropriate claims for outpatient hospital observation services when (1) outpatient hospital observation services are authorized by either the IPA/Medical Group or Alignment or (2) such services meet the CMS or nationally recognized evidenced-based guidelines for observation.

11. Medicare Outpatient Observation Notice (MOON)

CMS requires that hospitals, including critical access hospitals (CAHs) deliver the Medicare Outpatient Observation Notice (MOON) to Members who receive observation related services for more than twenty-four (24) hours. The purpose of the MOON is to inform Medicare beneficiaries of the reason(s) they are an outpatient receiving observation services for more than twenty-four (24) hours and are not inpatients of the hospital or CAH. The MOON must also contain the implications of receiving outpatient services with regard to Medicare cost-sharing and coverage for post-hospitalization services. Hospitals and CAHs must deliver the notice no later than thirty-six (36) hours after observation services begin.



12. Continuity of Care

Alignment expects that all contracted specialists, PCPs, and Participating Providers cooperate with continuity of care efforts that promote high quality, effective medical care. Behavioral health specialists, with written consent from the Member, will collaborate with PCPs to provide safe, appropriate, and coordinated health care.

Alignment will also coordinate with the previous insurance carrier to provide continuing health care to Members with specific conditions who have been receiving care from a terminated Participating Provider for a period of time or until a safe transfer to new Participating Providers can be arranged.

13. Annual Wellness Visit

An Annual Wellness Visit ("AWV") is an annual health assessment performed by Participating Providers by completing a comprehensive evaluation of all the chronic and acute health conditions that are present in the Member through a face-to-face encounter or an audio/visual telehealth visit, provided the guidelines are met. The AWV is designed to ensure that Members receive an early and comprehensive assessment, detection, identification, diagnose, documentation, treatment and management of chronic, acute, suspect conditions and care gaps, and to ensure accurate coding is reported to CMS by sufficiently and accurately documenting each AWV in the Member's medical records, timely submission of the claims related to the visit, and development and implementation of a care plan for the Member, including referrals into Alignment's chronic disease management programs, as appropriate. To qualify as an Annual Wellness Visit, the visit must meet, at a minimum, all of the criteria and elements required by CMS.

Participating Providers staff must follow Alignment's coding guidelines, which are based on current CMS HCC coding guidelines, the International Classification of Diseases Tenth Revision – Clinical Modification (ICD-10-CM), and the American Hospital Association (AHA) coding clinic for ICD-10 references to assign ICD-10-M codes based on medical chart document reviews. Participating Providers will ensure that all Primary Care Physicians (PCPs) receive compliance training specifically relating to appropriate standards for accurate, complete, and properly sourced coding every year.

Participating Providers will ensure the PCPs accurately and compliantly code all diagnoses present on all assigned Members receiving an AWV, in accordance with CMS guidelines for documenting Member risk evaluations, and in accordance with Alignment's coding guidelines. Participating Providers and PCP submissions of the AWVs are subject to audit at the discretion of Alignment. If through Alignment's audits it is determined that the Participating Provider is out of compliance with the guidelines specified above, Alignment may issue a corrective action plan.

Participating Providers will work with its PCPs to develop specified recommendations for treatment of care to all its assigned Members who receive a completed AWV. The PCP will ensure that the treatment of care plan is implemented and refer Members to Alignment's chronic disease management programs.

14. Out-of-Area Medical Services

Out-of-Area medical services are those emergent or urgently needed services to treat an unforeseen illness or injury that arises while a Member is outside the Participating Provider's service area. Alignment is responsible for the management of Out-of-Area services, unless otherwise specified in the IPA's/Medical Group's Participating Provider Services Agreement. Medical services that are provided outside the defined service area and that are arranged, referred directly or indirectly, and/or authorized by a Participating Provider may be the Participating Provider's financial responsibility and are not considered Out-of-Area services.

For HMO members, IPAs/Medical Groups and Participating Providers are requested to notify Alignment within one (1) business day of becoming aware of any known Out-of-Area cases and when Alignment is or may be at risk for



such services. Once deemed stable for transfer to an in-area facility, the Participating Provider must work actively and collaboratively with Alignment to return the Member to a contracted Participating Provider in a timely fashion. If the Participating Provider does not cooperate with Alignment, or delays the transfer of a Member considered medically stable for transfer, Alignment may hold the Participating Provider financially responsible for any additional Out-of-Area charges incurred as a result of the delay.

15. Travel Dialysis

Travel dialysis services are dialysis services required by a Member who is temporarily outside the IPA's/Medical Group's or Alignment's service area. Travel dialysis is not considered an Out-of-Area medical service. The financial responsibility for travel dialysis will be the same as dialysis services included in the IPA's/Medical Group's Division of Financial Responsibility. Travel dialysis services do not require prior authorization, but delegated IPAs/Medical Groups are responsible for the medical management of Members who require travel dialysis services. In addition, Participating Providers are requested to notify Alignment within one (1) business day upon becoming aware of a Member utilizing travel dialysis services.

16. Out-of-Network Services

Out-of-Network services are provided or arranged by providers who are not contracted with Alignment. With some exceptions as set forth in the Member's Evidence of Coverage, Alignment covers services only provided by providers who are in the Alignment contracted network. Participating Providers are responsible for obtaining prior authorization from Alignment prior to referring, authorizing or directing services Out-of-Network when such services are Alignment's financial responsibility in accordance with the IPA's/Medical Group's Division of Financial Responsibility and the Participating Provider Group's agreement with Alignment. A Participating Provider who fails to obtain prior authorization from Alignment may be financially responsible for such Out-of-Network services.

PPO members can elect to use out-of-network providers but may be subjected to higher copays or co-insurance by choosing to do so. Out-of-network services for PPO members do not require plan notification or authorization, however they can be requested and are encouraged for some services to ensure there is no delay in claims processing as out-of-network services are subject to a medical necessity review upon claims submission. Services deemed to be not covered will result in the claim being denied and the responsibility of the member. Out-of-network services for PPO members are subject to the member's out-of-network cost share. Alignment PPO members will have less out-of-pocket expense if they select a provider in the network.

17. Direct Access Services

To ensure that all female Members have direct access to obstetrical and gynecological providers, CMS requires that Managed Care Organizations, IPAs, and Medical Groups provide or arrange for necessary specialty care, including direct access to in-network women's health specialist(s) for routine and preventative services. Female Members shall have the option to seek obstetrical and preventative gynecological physician visits directly from an obstetrician and gynecologist or directly from a family practice physician providing obstetrical and gynecological services without prior approval from another physician, another provider, or the health care plan on an unlimited basis.

18. Transplants

Unless stated otherwise in your agreement with Alignment, Participating Providers must receive prior authorization from Alignment's UM Department for all transplant services, including pre-transplant evaluations and post-transplant services in any situations where Alignment is financially responsible. The PCP or referred specialist is responsible for the initial diagnostic workup prior to a referral to an approved transplant center. The Alignment Case Manager will work



with the Member's PCP and other specialists to complete an assessment of the Member's health care needs in order to develop, implement, and monitor a care plan; coordinate services and to re-evaluate the care plan for the Member. Scheduled admissions or referrals to a tertiary or general acute hospital must be authorized by Alignment. If a Member needs an organ transplant, Alignment will arrange to have the case reviewed by an approved Medicare Transplant Center.

19. Second or Third Opinions

To provide Members with a medically necessary second medical opinion from an appropriately qualified health care professional not previously involved in the Member's treatment plan, the second opinion will serve to evaluate and determine the medical necessity for any proposed or continued treatment or medical options for the Member's condition. CMS requires that every Medicare Advantage Prescription Drug organization have procedures in place for utilization management, including the availability to members of a second and, in some cases, a third opinion.

20. Interpreter Services

Participating Providers are expected to have mechanisms in place to ensure that interpreter services are available to Members in order to access health care services. In addition:

- Interpreter services shall be provided by Alignment at no cost to the Member.
- Members are encouraged to use interpreter services instead of relying on family and friends.
- Participating Providers are to ensure availability of trained bilingual staff members for medical interpreting.
- Record the Member's primary spoken language and any request for or refusal of interpreter services

To access interpreter services:

- For Alignment Health Plan Members, please contact Member Services (see [Exhibit 1: Member Services](#)) at least seven (7) days prior to when the service will be needed.
- For FirstMedicare Direct Members, please contact FirstMedicare Direct's Member Services (see [Exhibit 1: Member Services](#)).

21. Referrals

The PCP is responsible for the management and coordination of a Member's complete medical care, including initial and primary care, maintaining continuity of care, and initiating specialist referrals. The PCP refers for specialty care when additional knowledge or skills are required. Nondelegated Participating Providers may use AVA[®] to initiate referrals (see [Exhibit 1: Utilization Management](#)). The IPA/Medical Group/delegated Participating Provider Group shall refer Members to its contracted providers and to Alignment-contracted Participating Providers when such referral services are Alignment's financial responsibility. In the event the use of a non-Participating Provider is necessary, the IPA/Medical Group shall obtain prior authorization from Alignment when Alignment is at risk for such services. IPAs/Medical Groups/delegated Participating Provider Groups are responsible for the following:

- Monitoring referrals that have been authorized for medically appropriate care to ensure that Alignment Members have access to and follow up with the PCP. In turn, the PCP is responsible for maintaining continuity of care for the Members during the referral process.
- Monitoring the quality of care and the cost associated with outside referrals.
 - Ensuring timely payment to the referred Participating Providers for covered services.
 - Ensuring that the Member is able to get an appointment within ten (10) business days for routine visits. Expedited requests are two (2) calendar days.



- Notifying Alignment upon a Member's permanent relocation outside the Alignment service area or when a Member resides outside the Alignment service area for more than six (6) months. Notification should be called in to Alignment Member Services (see [Exhibit 1: Member Services](#)).

If the IPA/Medical Group receives a request for services for which it is not delegated, it is responsible for redirecting the requesting Member and/or provider to the Health Plan and notifying Alignment.

Alignment HMO members must obtain all routine services within the Alignment provider network, unless such services are urgent, emergent, needed for travel dialysis or when prior approval has been provided by the plan. Alignment HMO-POS members have limited out-of-network coverage for routine services. All services not covered under the Point of Service (POS) benefit must be obtained within the Alignment provider network, unless such services are urgent, emergent, needed for travel dialysis or when prior approval has been provided by the plan.

Alignment PPO members can utilize providers both in and out of the network. All referrals in which Alignment is or may be at risk, except for Emergency Services, Direct Access services, and services specifically excluded from prior authorization in accordance with CMS, other regulatory agencies and referenced in the Prior Authorization Guidelines (see [Exhibit 1: General Resources](#)), require prior authorization from the IPA/Medical Group/delegated Participating Provider Group or Alignment, as set forth in this section.

22. Revocation of Delegated Medical Management

Alignment reserves the right to revoke delegated status when the IPA/Medical Group/delegated Participating Provider Group has failed to meet and maintain established standards.

23. Prior Authorizations

Alignment Healthcare Participating Providers are required to comply with Alignment's prior authorization policy for services that require prior authorization. These guidelines provide information about the services that require prior authorization, which services are automatically approved and how to submit requests for authorization. Failure to comply with Alignment's prior authorization policy or failure to obtain prior authorization from Alignment may result in Participating Providers' being financially responsible for such services, up to and including offsets from future payments to the Participating Providers. Medicare Advantage health plans must follow Centers for Medicare & Medicaid Services (CMS) regulations. All services and procedures, regardless of place of service, must be covered by CMS or added to as a supplemental benefit offered by the health plan.

For all Alignment Members, nondelegated Providers are required to obtain a prior authorization for the procedures listed in the Prior Authorization Guidelines (see [Exhibit 1: General Resources](#)). Failure to do so, may result in the member and/or provider being held financially responsible for the procedure.

How to Request a Prior Authorization:

Nondelegated Providers can request a prior authorization through any of the following methods:

- Use AVA® to initiate/request prior authorizations, to view statuses of existing authorizations and claims, and to submit inquiries(see Exhibit 1: Utilization Management and Claims).
- Fax
- Phone



Delegated providers should have a designated authorization form and/or process for its Participating Providers. Prior authorization requests can be initiated through:

- Fax
- Phone

(Refer to [Exhibit 1: Utilization Management](#) for detailed contact information and [Exhibit 13.1](#) for a sample Prior Authorization Request form).

Information Required:

Information required for a prior authorization request may include, but is not limited, to:

- IPA/Medical Group name*
- Member name and Member ID number
- IPA/Medical Group/delegated Participating Provider Group authorization number, if appropriate*
- Referring Participating Provider name
- Requested facility or Participating Provider name
- Description of service (inpatient admission, outpatient surgery, SNF, DME, hospice, etc.). If home health service, treatment plan should be included
- Admissions date (if scheduled) or service start date (if applicable), with estimated length of stay or service end date
- Number of visits (if applicable)
- Admitting diagnosis or primary diagnosis (description and ICD-10 code/s)
- Admitting and/or attending physician name
- Procedure (description and CPT code/s)
- Clinical rationale for service
- Description of treatment related to diagnosis and requested service/s to date (to include but not limited to diagnostics labs, scans, etc.), consults, treatment to date (such as physical therapy, procedures) and recommendations, elective referrals, inpatient services, and outpatient procedures requested by physicians.

*Applies to Delegated Providers

Alignment's UM staff, or Alignment's designee, will review the request, and the authorization will be either approved or denied. Only a licensed physician can deny services. All determinations will be communicated in writing to the requesting Participating Provider. The Member will be notified orally and in writing for all expedited requests.

24. Authorization for Skilled Nursing Facility (SNF)

For delegated providers, the IPA/Medical Group shall follow the procedures set forth in this section for referral to and authorization of skilled nursing facility (SNF) services. In addition, the IPA/Medical Group shall authorize the level of care and the number of therapies that are required for the Member.



Unless otherwise authorized by Alignment, SNF admissions are required to be directed to SNFs that are in-network with Alignment when such services are Alignment's financial responsibility. Please refer to the Concurrent Review Process outlined in this section of the Provider Operations Manual for guidance on inpatient acute concurrent reviews.

For nondelegated providers, to request prior authorization with an in-network SNF, call or fax Alignment ([Exhibit 1: Utilization Management](#))

25. Utilization of Ambulatory Surgery Centers

Members who require an outpatient surgical procedure should be referred to an Alignment-contracted free-standing Ambulatory Surgery Center (ASC) when medically appropriate and in accordance with the national clinical guidelines. All services that can be rendered at an ASC must be directed appropriately.

For delegated Providers, failure to direct care to the appropriate setting may result in financial responsibility for the IPA/ Medical Group/delegated Participating Provider Group for any incremental costs incurred by Alignment.

26. Authorization of Other Ancillary & Supplemental Services

For HMO Members, Participating Providers are required to use Alignment's in-network ancillary and supplemental providers which are contracted with Alignment when Alignment is or may be at risk for such services. Referring Members to a non-designated ancillary or supplemental vendor could result in a deduction in payment for services incurred to such non-designated provider.

PPO members using in-network providers pay zero or lower copays and co-insurance. PPO members can elect to use out-of-network providers but may be subjected to higher copays or co-insurance by choosing to do so. All services, procedures and medications listed on the prior authorization list still requires clinical review for final determination.

Reference [Section 16: Prescription Drug Benefits and Pharmacy Services](#) of this Provider Operations Manual for prescription drug benefits and pharmacy services related to diabetic supplies. For a complete listing of Alignment's designated ancillary and supplemental providers for these services, please see Alignment's Website and the Provider Resource Guide noted in [Exhibit 1: General Resources](#).

27. Utilization Management Carved-Out Services

Some agreements with Alignment may include services in which the Participating Providers are not delegated to provide authorization for select services ("Carved-Out Services"). Please refer to the Utilization Management delegation section of your agreement with Alignment. Carved-Out procedures/specialty referrals must be sent to Alignment for authorization and include the applicable CPT code(s) for the Carved-Out procedures/specialty referral. See [Exhibit 13.2: UM Carved-Out Services and CPT Codes](#) for a list of Carved-Out Services and CPT Codes. Urgent requests must be submitted to Alignment within four (4) hours of receipt by the Participating Provider, and routine requests must be submitted to Alignment within one (1) business day. The Participating Provider must also notify Members that Alignment is responsible for determining medical necessity.

28. Hospice Authorizations

For hospice authorizations, the Member must sign the Participating Provider's designated authorization form indicating that he/she has elected hospice care. (See [Medicare Hospice Benefits](#) at www.cms.gov for further details.) The physician is required to sign a certification of terminal illness. In situations where the Member is unable to sign, an Appointment of Representative form must be completed. This form can be found at CMS.gov.



SECTION 13.1 SAMPLE PRIOR AUTHORIZATION REQUEST FORM

PRIOR AUTHORIZATION REQUEST

For assistance, contact the Referrals/Authorizations Department at 844-310-2247, ext. 5553

Please complete the following in its entirety and fax it to 562-207-4628

Practice Location: _____ Date: _____

PCP: _____

Priority

Routine	Urgent - Expedited/Urgent is defined: "in which the routine referral process could seriously jeopardize the life and health of the Member or the Member's ability to regain maximum function."
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Patient Name (Please Print) Last	First	Middle	Sex	Date of Birth
Address	City	State	ZIP	Telephone
Type of Service (Check, if applicable.)				
HOSPITAL				
Outpatient Inpatient Office DME Home Health Dialysis Chemotherapy				
Injectable (MUST INCLUDE NDC)				

Referred to Physician/Facility: _____ Specialty: _____

Address: _____ Phone: _____ Fax: _____

Diagnosis: _____ ICD-10 Code(s): _____

Procedure: _____ CPT Code(s): _____

(Indicate quantities.)

Injectable Code: _____ NDC _____ Quantity/Units _____

Injectable Code: _____ NDC _____ Quantity/Units _____

Additional Codes (Please include NDC and units.): _____



Attach pertinent progress notes/diagnostic studies to support request.

Requesting Physician: _____

Telephone No.: _____

Person Completing Form: _____ Telephone No. and Ext.: _____

Fax No.: _____



SECTION 13.2 UM CARVED-OUT SERVICES AND CPT CODES

WHIPPLE	
48150	Pancreatectomy, proximal subtotal with total duodenectomy, partial gastrectomy, choledochoenterostomy and gastrojejunostomy (Whipple-type procedure); with pancreateojejunostomy
48152	Pancreatectomy, proximal subtotal with total duodenectomy, partial gastrectomy, choledochoenterostomy and gastrojejunostomy (Whipple-type procedure); without pancreateojejunostomy
48153	Pancreatectomy, proximal subtotal with near-total duodenectomy, choledochoenterostomy and duodenojejunostomy (pylorus-sparing, Whipple-type procedure); with pancreateojejunostomy
48154	Pancreatectomy, proximal subtotal with near-total duodenectomy, choledochoenterostomy and duodenojejunostomy (pylorus-sparing, Whipple-type procedure); without pancreateojejunostomy
TRANSCATHETER AORTIC VALVE REPLACEMENT (TAVR)	
33361	Transcatheter aortic valve replacement (TAVR/TAVI) with prosthetic valve; percutaneous femoral artery approach
33362	Transcatheter aortic valve replacement (TAVR/TAVI) with prosthetic valve; open femoral artery approach
33363	Transcatheter aortic valve replacement (TAVR/TAVI) with prosthetic valve; open axillary artery approach
33364	Transcatheter aortic valve replacement (TAVR/TAVI) with prosthetic valve; open iliac artery approach
33365	Transcatheter aortic valve replacement (TAVR/TAVI) with prosthetic valve; transaortic approach (e.g., median sternotomy, mediastinotomy)
33366	Transcatheter aortic valve replacement (TAVR/TAVI) with prosthetic valve; transapical exposure (e.g., left thoracotomy)
33367	Transcatheter aortic valve replacement (TAVR/TAVI) with prosthetic valve; cardiopulmonary bypass support with percutaneous peripheral arterial and venous cannulation (e.g., femoral vessels) (List separately in addition to code for primary procedure.)
33369	Transcatheter aortic valve replacement (TAVR/TAVI) with prosthetic valve; cardiopulmonary bypass support with central arterial and venous cannulation (e.g., aorta, right atrium, pulmonary artery) (List separately in addition to code for primary procedure.)
CORONARY ARTERY BYPASS GRAFT (CABG)	
33510	CABG with vein only, 1 graft
33511	CABG with vein only, 2 grafts
33512	CABG with vein only, 3 grafts
33513	CABG with vein only, 4 grafts
33514	CABG with vein only, 5 grafts
33516	CABG with vein only, 6 or more grafts

**ACETABULOPLASTY; RESECTION, FEMORAL HEAD (EG, GIRDLESTONE PROCEDURE)**

27120	Acetabuloplasty; (e.g., Whitman, Colonna, Haygroves, or cup type)
27122	Acetabuloplasty; resection, femoral head (e.g., Girdlestone procedure)
27125	Hemiarthroplasty, hip, partial (e.g., femoral stem prosthesis, bipolar arthroplasty)
27130	Arthroplasty, acetabular, and proximal femoral prosthetic replacement (total hip arthroplasty), with or without autograft or allograft
27132	Conversion of previous hip surgery to total hip arthroplasty, with or without autograft or allograft
27134	Revision of total hip arthroplasty; acetabular component only, with or without autograft or allograft
27137	Revision of total hip arthroplasty; femoral component only, with or without allograft
27138	Osteotomy and transfer of greater trochanter of femur (separate procedure)
27140	Osteotomy, iliac, acetabular or innominate bone
27146	Osteotomy, iliac, acetabular or innominate bone; with open reduction of hip
27147	Osteotomy, iliac, acetabular or innominate bone; with femoral osteotomy
27151	Osteotomy, iliac, acetabular or innominate bone; with femoral osteotomy and with open reduction of hip
27156	Osteotomy, pelvis, bilateral (e.g., congenital malformation)
27158	Osteotomy, femoral neck (separate procedure)
27161	Osteotomy, intertrochanteric or subtrochanteric including internal or external fixation and/or cast
27165	Open treatment of slipped femoral epiphysis; osteoplasty of femoral neck (Heyman-type procedure)
27179	Open treatment of slipped femoral epiphysis; osteoplasty of femoral neck (Heyman-type procedure)
27181	Open treatment of slipped femoral epiphysis; osteotomy and internal fixation
27185	Epiphyseal arrest by epiphysiodesis or stapling, greater trochanter of femur
27187	Prophylactic treatment (nailing, pinning, plating or wiring) with or without methylmethacrylate, femoral neck and proximal femur

ORTHO: TOTAL KNEE REPLACEMENT

27437	Arthroplasty, patella; without prosthesis
27438	Arthroplasty, patella; with prosthesis
27442	Arthroplasty, femoral condyles or tibial plateau(s), knee
27445	Arthroplasty, knee, hinge prosthesis
27446	Arthroplasty, knee, condyle and plateau; medial OR lateral compartment
27447	Arthroplasty, knee, condyle and plateau; medial AND lateral compartments with or without patella resurfacing (total knee arthroplasty)
27486	Revision of total knee arthroplasty, with or without allograft; 1 component
27487	Revision of total knee arthroplasty, with or without allograft; femoral and entire tibial component
27488	Removal of prosthesis, including total knee prosthesis, methylmethacrylate with or without insertion of spacer, knee

**LAMINECTOMY FOR BIOPSY/EXCISION OF INTRASPINAL NEOPLASM; INTRADURAL, SACRAL**

63185	Laminectomy with rhizotomy; 1 or 2 segments
63191	Laminectomy with section of spinal accessory nerve
63200	Laminectomy, with release of tethered spinal cord, lumbar
63190	Laminectomy with rhizotomy; more than 2 segments
63275	Laminectomy for biopsy/excision of intraspinal neoplasm; extradural, cervical
63276	Laminectomy for biopsy/excision of intraspinal neoplasm; extradural, thoracic
63277	Laminectomy for biopsy/excision of intraspinal neoplasm; extradural, lumbar
63278	Laminectomy for biopsy/excision of intraspinal neoplasm; extradural, sacral
63172	Laminectomy with drainage of intramedullary cyst/syrinx; to subarachnoid space
63283	Laminectomy for biopsy/excision of intraspinal neoplasm; intradural, sacral
63194	Laminectomy with cordotomy, with section of 1 spinothalamic tract, 1 stage; cervical
63195	Laminectomy with cordotomy, with section of 1 spinothalamic tract, 1 stage; thoracic
63196	Laminectomy with cordotomy, with section of both spinothalamic tracts, 1 stage; cervical
63197	Laminectomy with cordotomy, with section of both spinothalamic tracts, 1 stage; thoracic
63170	Laminectomy with myelotomy (e.g., Bischof or DREZ type), cervical, thoracic, or thoracolumbar
63173	Laminectomy with drainage of intramedullary cyst/syrinx; to peritoneal or pleural space
63250	Laminectomy for excision or occlusion of arteriovenous malformation of spinal cord; cervical
63251c	Laminectomy for excision or occlusion of arteriovenous malformation of spinal cord; thoracic
63252	Laminectomy for excision or occlusion of arteriovenous malformation of spinal cord; thoracolumbar
63266	Laminectomy for excision or evacuation of intraspinal lesion other than neoplasm, extradural; thoracic
22220	Osteotomy of spine, including discectomy, anterior approach, single vertebral segment; cervical
22222	Osteotomy of spine, including discectomy, anterior approach, single vertebral segment; thoracic
22224	Osteotomy of spine, including discectomy, anterior approach, single vertebral segment; lumbar
22226	Osteotomy of spine, including discectomy, anterior approach, single vertebral segment; each additional vertebral segment (List separately in addition to code for primary procedure.)



SECTION 14 QUALITY MANAGEMENT PROGRAM

Overview

The Alignment Quality Management (QM) Program is a comprehensive program designed to promote high-quality care and service excellence. The overall goal is to maximize and optimize the cost-effective delivery of care with the best possible health outcomes for our Members. The program helps with monitoring and evaluating current practices and implementing Quality Improvement (QI) initiatives.

The Program provides the foundation for fulfilling regulatory and statutory requirements of CMS and NCQA®, as well as other required regulatory requirements.

Alignment and IPAs/Medical Groups and Participating Providers are required to engage in specific reviews and tasks applicable to state and federal regulatory guidelines that are geared toward improving care for Members enrolled in an Alignment plan; however, most QM and QI activities are not delegated functions and are the responsibility of Alignment.

1. Participation in the Quality Management (QM) Program

Participating Providers play an integral role in the implementation of the QM Program and are expected to understand and acknowledge the policies and procedures described by Alignment. Participating Providers are required to cooperate with our QM Department program requests and in doing so, Participating Providers are to provide access to the medical records of current or previously enrolled Members, as permitted by state and federal law.

The QM Program focus includes but is not limited to:

- Medical Records Review
- Focus Studies
- Member Satisfaction Surveys
- Peer-Review Investigations
- Complaint Inquiries
- Chronic Condition Improvement Projects
- SNP Model of Care Requirements
- Access and Availability Studies (may be a delegated function)

When documentation is presented and there is an opportunity to improve a Member's care, Participating Providers may be asked to participate in formulating the care plan.

2. Data Collection Process

Monitoring activities are designed for a broad range of health care issues, with focus on identifying areas of needed improvement in clinical and administrative areas. The ongoing monitoring of these activities will include reviews of compliance with clinical and administrative standards, as well as with accrediting agencies. Data is collected on a routine basis (monthly, quarterly, and/or annually) and on an ad hoc basis from internal and external sources.



This data is obtained by:

- Reviewing documentation in medical records
- Conducting Provider-site visits
- Evaluation of Member outcomes
- Trending of administrative data
- Review of target diagnoses and sentinel events
- Trending of Member and Participating Provider complaints, grievances, and appeals
- Evaluation of Care and Disease Management outcomes

3. Quality Improvement Committee (QIC)

Alignment's Quality Improvement Committee (QIC) and subcommittees provide oversight of the QM program, policies, and procedures. The purpose of the QIC is to provide oversight of the QM Program as it reviews, approves, and makes recommendations for the Program on at least an annual basis. In addition, the QIC Committee ensures that the implementation of the QM Program is responsive to and supports improving health outcomes, improving Member satisfaction; and ensures that the collection, analysis, and reporting of quality data is in compliance with regulatory mandates and with accreditation standards.

The QIC reviews the Annual Quality Management Program and Annual Quality Management Evaluations, requests additional information when indicated, and directs action on opportunities to improve care and services or to resolve problems when required.

4. Chronic Care Improvement Program (CCIP)

As required by regulation, each Medicare Advantage Organization must develop and implement a Chronic Care Improvement Program (CCIP) as part of its required QI Program. A CCIP is a clinically focused initiative designed to improve the health of a specific group of Members with chronic conditions.

The CCIP initiative requires a focus on promoting effective management of chronic disease for a three-year cycle.

5. Provider Satisfaction

The monitoring, evaluation, and improvement of Provider satisfaction are key components of Alignment's QM Program. Provider surveys may be conducted in order to gain an understanding of the level of satisfaction with the quality of services provided by various Alignment departments. Feedback is provided to Participating Providers and shared with stakeholders through the QIC and the Annual QM Program evaluation.

6. Member Satisfaction

Alignment participates in regulatory Member Satisfaction Surveys, as well as monitors Member satisfaction with certain clinical programs. Member satisfaction data and surveys are used to track and trend Member satisfaction and to identify opportunities for improvement by using the continual QI process. Clinical Program Member Satisfaction Surveys are shared with stakeholders through the QIC and the Annual QM Program Evaluation.



7. Medical Record Documentation

Participating Providers are required to maintain a complete medical record for every Alignment Member for whom they provide care. Participating Providers shall maintain standards set forth by, but not limited to, accrediting agencies, Alignment, and state and federal regulatory requirements and guidelines that apply to medical records documentation and standards.

Participating Providers will ensure that their office personnel maintain the following:

- Confidentiality, security, and physical safety of medical records
- Timely retrieval and distribution of medical records upon request between the Participating Provider and Alignment
- Unique identification of each Member's medical record
- Supervision of the collection, processing, maintenance, and storage of medical records
- Secured and organized medical record format
- Periodic training in HIPAA standards and Member information confidentiality

Participating Providers must have medical records procedures that address all areas listed below:

Individual Medical Records

All Participating Providers are required to maintain a medical record for all Members seen and treated and to document the Member's evaluation, treatment, and diagnosis. The record is designed to maintain a

Member's documented medical information of the care provided, as well as all ancillary services/diagnostic tests ordered, and all referred services in a consistent, logical, and uniform manner.

Medical record entries are to be legible, made in a timely manner, and dated and signed by the appropriate practitioner.

Participating Providers shall maintain medical records in a detailed and comprehensive manner that conforms to good professional medical practice; permits effective professional medical review and medical audit processes; and facilitates an adequate system for follow-up treatment.

Protection and Confidentiality

All Participating Providers are required to meet all regulatory requirements for medical record-keeping, including confidentiality, and to maintain records in a protective and confidential manner with access limited to authorized Providers and their staff. Policies and procedures must be maintained to ensure appropriate record-processing in order to prevent breach of confidentiality or the unauthorized release of Member information. Electronic records must be password-protected, and staff are to be provided different levels of access, depending on position. Office staff should receive initial and periodic training concerning medical record confidentiality.

Storage, Filing, and Availability

Medical records are required to be stored in a secure, locked location or maintained in an electronic medical/record system. Records kept in accordance with these standards facilitate medical care and continuity of care among Participating Providers. All Participating Providers must maintain an organized record-keeping system to make the individual medical record readily available for each Member visit or contact, including collection, processing, maintenance storage, retrieval, identification, and distribution. In the event a Member changes Provider, medical records must be transferred to the new Provider in a timely manner that ensures continuity of care and does not interfere or delay services.



Record Retention/Destruction

Accurate and complete Member medical records are required to be kept, maintained, and retained for purposes of audit and evaluations by Alignment or regulatory agencies for a period of no less than ten (10) years, or longer. Retention may be extended beyond 10 years based on the state medical record retention statute or maintained longer if records are under inspection, evaluation, or audit. Medical records that have reached the required years of retention must be destroyed by a recognized medical record destruction company.

Release of Information

The medical record is a legal document, and its contents are confidential. Information from, or copies of, records may be released only to authorized individuals. The Participating Provider must ensure that unauthorized individuals cannot gain access to, or alter, these records. Written consent must be obtained from the Member prior to release of copied records. The consent should be a part of the medical record. Member medical records must be made available to authorized reviewers, per applicable state laws and regulations.

The criteria utilized for medical records and quality-of-care standards are based upon regulatory requirements outlined by regulatory agencies, accreditation guidelines, and accepted national organizations and are subject to change based upon nationally recognized practice guidelines.

Participating Providers will be given the results of the audit review and, if warranted, a Corrective Action Plan (CAP) addressing any deficiencies. Any area that is not compliant with regulatory or Alignment standards will require a CAP. The Participating Provider will be required to implement actions for improvement and provide them to Alignment by fax or email within five (5) business days of receiving the results (see [Exhibit 1: Quality Management](#)). Should a Participating Provider not acknowledge by signing and returning the CAP in the allotted time, a final request will be sent to the Participating Provider, and any Member assignments or referrals may be deferred until the signed plan is received by Alignment. Recredentialing may not occur if the Participating Provider has an outstanding CAP. A follow-up audit will be scheduled and conducted within a reasonable time frame to ensure that all deficiencies are corrected and meet regulatory compliance.

8. Appointment Availability and Access to Care

All Participating Providers are responsible for meeting the access standards outlined in this section. Alignment monitors the ability of its Members to access each service type according to the specified Access to Care Standards.

The Access to Care Standards table below outlines the CMS/NCQA® requirements. When a state has standards that are different than CMS, Alignment adheres to the standard that is most restrictive.

For state specific standards, please refer to the state's Department of Managed HealthCare (or the state's equivalent agency) to determine if there are state specific requirements.

PCP/SCP Access to Care Standards	
Access Measure	Time-Elapsed Standard
Access to Life-Threatening Emergency Care	Immediately
Access to PCP or designees	24 hours a day, 7 days a week
Routine Primary Care, Non-urgent appointments	Must offer the appointment within 10 business days of request



PCP/SCP Access to Care Standards	
Access Measure	Time-Elapsed Standard
Adult physical exams and wellness checks	Must offer the appointment within 30 calendar days of request
Routine Specialist Physicians, Non-urgent appointments	Must offer the appointment within 15 days of request
Urgent Care appointments that do not require prior authorization (includes appointment with any Physician, Nurse Practitioner, Physician's Assistant in office)	Must offer the appointment within 2 days (48 hours) of request
Urgent Care appointments that require prior authorization (SCP)	Must offer appointment within 96 hours of request
Non-urgent appointments for ancillary services (diagnosis or treatment of injury, illness, or other health condition)	Must offer the appointment within 15 business days of request
After-hours care	Physicians are required by contract to provide 24 hours, 7 days a week coverage to Members
Initial Health Assessment (enrollees age 18 years and older)	Must be completed within 90 calendar days of enrollment
Behavioral Health Access Measure	Time-Elapsed Standard
Access to life-threatening Emergency Care	Immediately
Non-urgent appointments with a Physician mental health Provider	Must offer the appointment within 10 business days of request
Non-urgent appointments with a non-Physician mental health care Provider	Must offer the appointment within 10 business days of request
Urgent care appointments	Must offer the appointment within 24 hours of request
Access to care for non-life-threatening emergencies	Within 6 hours

9. Potential Quality of Care Events

Alignment is committed to improving patient safety and promoting a supportive environment for Participating Providers to improve patient safety in their practices. Many of the ongoing Quality Management Program measurement activities include safety components, such as measures for accessibility, availability, adherence to clinical practice guidelines, and medical records documentation. Potential quality of care issues should be reported securely and as soon as identified or no later than 90 days from the time of incident to ensure that all relevant documentation and/or records can be obtained and to ensure that a thorough review can be conducted (see [Exhibit 1: Quality Management](#)).

Potential quality of care investigations are not a delegated function and, therefore, should be referred to Alignment if identified. Participating Providers are required to provide a timely response to quality inquiries and to implement improvement interventions, should a serious quality event be identified.

10. Preventive Health Services

Alignment has adopted age-specific preventative health care guidelines for the prevention and early detection of illnesses and diseases. The guidelines are based on those from CMS, the Centers for Disease Control and Prevention, applicable accreditation organizations, and other nationally recognized organizations. These guidelines are reviewed and revised, as needed, on an annual basis and then presented and approved at the Quality Improvement Committee. Preventative health care guidelines will be distributed to Members and Participating Providers.



All Participating Providers are supplied with established current preventative guidelines and are required to adhere to those guidelines in administering health care services to Alignment Members. Alignment may monitor the extent to which Participating Providers are adhering to these set guidelines.

For your convenience, a copy of the Medicare Preventative Services Quick Reference Information is available at www.cms.gov by following the link: Medicare Preventive Services.

11. Member Health Education and Wellness Promotion

Participating Providers are responsible for meeting the health education needs of Alignment Members. Appropriate brochures and class offerings should be available for Participating Providers to distribute to their Members. Participating Providers are responsible for referring Members to Alignment's health and wellness resources.

Alignment's education programs are a combination of coordinated and systematic health education. Member outreach and distribution of materials are designed to target a specific health problem or population. Members are identified as eligible for these programs, based on specific inclusion criteria for each program.

Alignment periodically distributes disease-specific educational material to identified individuals; such topics may include COPD, CAD, diabetes, preventative care, and behavioral health.

12. Behavioral Health Care

The Alignment Quality Management Program's scope incorporates both medical and behavioral health care services. Alignment includes a designated behavioral health Provider in the Quality Improvement Committee, as needed, in order to encourage appropriate input on behavioral health issues.

Coordination of care between general medical care and behavioral health care is essential to the well-being of Members. Processes have been implemented to facilitate the exchange of information in an effective, timely, and confidential manner. Alignment collaborates with its Participating Providers to assist them and the Members to access all care required.

13. Cultural and Linguistic Competence

Alignment is committed to cultural competency by improving health care through meeting the unique and diverse needs of all its Members. Our set of values, principles, policies, and structures will enable the Alignment staff, IPAs/ Medical Groups, and Participating Providers to work cross-culturally in an effective manner.

At Alignment, cultural competency will evolve and grow with the comprehensive needs of our Members, ensuring that employees and Participating Providers understand and value cultural diversity. The employees and the Participating Providers of Alignment must possess the ability, aptitude, and behavior to work cross-culturally in the delivery of health care services. Employees and Participating Providers must effectively inform Providers of cultural competency educational opportunities available and provide services to Members:

- Irrespective of their cultures, ethnic backgrounds, race, and religion
- In a manner that recognizes, values, affirms, and respects the worth of the individual and that protects and preserves his/her dignity
- In a manner that removes cultural or language barriers by providing or obtaining alternative communication methods, as needed



- Utilizing culturally sensitive and appropriate educational materials, based upon the Member's race, ethnicity, and primary language spoken
- In a manner that increases satisfaction with clinical care and services while decreasing health care disparities in the minority populations we serve
- In a manner that increases the understanding of health issues, including diagnoses and treatment plans
- With sensitivity to cultural diversity, understanding the Members we serve
- Via the development of a Participating Provider network that mirrors the cultural and linguistic characteristics of Members and that provides for culturally appropriate services to Members
- Based on the evaluation of Provider offices for oral and written educational material and notices in languages that reflect the Membership
- Emphasizing the importance of cultural competency as part of the Provider's initial in-service
- With alternative communication methods that Alignment will arrange for Participating Providers for Members who have potential linguistic barriers

14. Patient Safety

Alignment promotes a comprehensive strategy to ensure patient safety by partnering with Members, Physicians, Practitioners, hospitals, ancillary Providers, and pharmacies. Members' education and risk awareness are central to this ongoing program, along with assessment of Participating Providers' patient safety initiatives.

There are ways that Participating Providers can develop a culture of patient safety in their practices. Clear communication is key to safe care. Collaboration among Members of the interdisciplinary care team, hospitals, care facilities, and the patient is critical. Safe practices can include writing legibly when documenting orders or prescribing and avoiding abbreviations that can be misinterpreted.

Alignment has established a process that allows our organization to respond in a timely manner to reports of immediate threats that may expose patients to health and safety risks, such as suicide threats, spousal abuse, and elder abuse. It is the Alignment policy that any employee who, during the normal course of performing assigned duties, observes, suspects, or has knowledge of a patient health and safety risk shall immediately report the known or suspected instance to any manager or director and appropriate agency.

15. Clinical Practice Guidelines for Monitoring and Improvement

The Clinical Practice Guidelines are used to assist Participating Providers and Members in their decisions about appropriate care for specific clinical circumstances. Alignment uses national, state, or specialty-recognized guidelines. Alignment systematically reviews and adopts evidence-based clinical practice and preventative health guidelines disseminated from peer-reviewed sources and from such organizations as the National Guideline Clearinghouse and U.S. Preventive Services Task Force. Guidelines for diseases and health conditions identified as most noticeable to Health Plan Members for the provision of preventative, acute, or chronic medical and behavioral health services are regularly reviewed by the Alignment Quality Improvement Committee to help improve the delivery of health care services to Members. Some of the clinical practice guidelines resources used include:

- American Heart Association
- American Stroke Association
- CMS Approved Drug Compendia



- Federal Drug Administration (the FDA)
- National Comprehensive Cancer Network
- National Institute of Mental Health
- The American College of Cardiology
- The American Diabetes Association
- The American Psychiatric Association
- The Global Initiative for Chronic Obstructive Lung Disease
- The Journal of the American Medical Association
- The National Institutes of Health

16. Quality Management Reporting for Participating Providers

Alignment requires its Participating Providers to submit reports to the Quality Management Department, as outlined in the tables below. To submit reports, log in to the Alignment Health Plan Provider page (see [Exhibit 1: General Resources](#)) and click on Reports Submission and then Delegation Reporting (unless otherwise directed in the table).

Quality Management Reporting Requirements - All		
Potential Quality of Care Issues (Not a Delegated Function)	Fax to the number noted in Exhibit 1: Quality Management	Concurrent, Expedited (within 2 hours) and standard (1 business day)
Quality Management Reporting Requirements - Delegated Groups Only		
Quality Program	Submit via the Plan's Provider Web page (login needed) †	Annually, by February 15
Case Management Program	Submit via the Plan's Provider Web page (login needed) †	Annually, by February 15
Access and Appointment Availability Studies Results* (routine, urgent appointments, after hours, new patients) for PCP, Specialist, Behavioral Health	Submit via the Plan's Provider Web page (login needed) †	Annually, by February 15 Semiannually, by August 15

* Please Note: Annual submissions should be most current study results from previous year, semi-annual submissions should be current-year quarterly study results. For IPAs/Medical Groups not conducting their own studies, Alignment will include IPAs/Medical Groups in annual studies survey and provide results in corrective action plans when not meeting metric standards.

† See [Exhibit 1: General Resources](#)



SECTION 15 CREDENTIALING

Overview

Alignment, or Alignment's designee, is responsible for validating and assessing the qualifications of network health care Participating Providers and for confirming their eligibility to participate in state and federal programs.

Policies and procedures have been established to require that a provider requesting participation in the Alignment network undergo the credentialing process. All Participating Providers must meet the credentialing criteria, standards, and requirements of NCQA® (National Committee for Quality Assurance), the leading health care accreditor and CMS and be approved by the Alignment Credentialing Committee to participate with Alignment, as described in this section.

For our delegated Participating Providers, Alignment typically delegates credentialing and recredentialing, provided that the Participating Provider Groups meets requirements of the credentialing criteria and standards of Alignment, NCQA® and CMS, as described in this section. Participating Providers may not subdelegate delegated credentialing responsibilities unless prior approval is received from Alignment.

1. Provider/Practitioner Credentialing

All Participating Providers who are providing health care services to Health Plan Members must be credentialed prior to caring for our Members. Participating Providers cannot see Members until the credentialing process is complete and the Provider is approved for participation. An active and unrestricted current license must always be maintained in order to provide patient care to our Members.

Participating Providers who utilize the services of a physician assistant or advanced registered nurse practitioner and who provide direct patient care to a Member under the supervision of a Participating Provider are also required to undergo the credentialing process. Scope of practice is limited to the rules and regulations established by the state in which they practice and by the policies and procedures of Alignment.

Credentialing/Rec credentialing applies to the following types of Practitioners/Providers:

- Audiologist
- Clinical Nurse Specialist
- Dietitian/Nutritionist
- Doctor of Addiction Medicine
- Doctor of Chiropractic
- Doctor of Medicine
- Doctor of Optometry
- Doctor of Osteopathy
- Doctor of Philosophy
- Doctor of Podiatric Medicine
- Doctor of Psychiatry
- Doctor of Psychology
- Educational Psychologist



- Licensed Acupuncturist
- Licensed Clinical Social Worker
- Licensed Professional Clinical Counselor
- Marriage Family Child Counselor/ Marriage Family Therapist
- Nurse Practitioner
- Occupational Therapist
- Physical Therapist
- Physician Assistant (PA)
- Post-Master Nurse Practitioner Diploma
- Professional Clinical Counselor
- Speech Language Pathologist

All covering Practitioners (locum tenens) or temporary Providers with an independent relationship with Alignment and delegated Participating Providers must also be credentialed if they serve in this capacity for more than 90 calendar days.

For nondelegated Participating Providers, a Provider's credentials are submitted to the Alignment Credentialing Committee, which either approves or denies the Provider's request for participation. Providers will be notified of the outcome of their request either by mail or email. However, if a recredentialed Provider is denied participation in the network due to a quality-of-care issue, then the Provider will be notified of the determination by mail or e-mail will have 30 days to appeal the decision of the Committee by requesting reconsideration.

2. Recredentialing

All Alignment Participating Providers must undergo recredentialing at least every 36 months, in accordance with regulatory requirements, accreditation, and Alignment's policies and procedures. The Participating Provider will need to complete a recredentialing application, along with the requested documentation, or participate with the Council for Affordable and Quality Healthcare (CAQH) to maintain a participating network status with Alignment. The Alignment Credentialing Committee will approve, deny, or modify the Participating Provider's status according to the established policies. If the Provider's recredentialing is denied or modified due to quality-of-care issues, the Provider will be notified of the determination by mail and will have 30 days to appeal the decision of the Committee by requesting reconsideration.

Delegated Participating Provider Groups should ensure that there is a similar process in place that requires the Participating Providers to undergo recredentialing every 36 months and to complete a recredentialing application, along with the requested documentation. Delegated Participating Provider Groups must ensure that recredentialing files are reviewed by a Credentialing Committee to approve, deny, or modify the Participating Provider's status according to the established policies, and if denied or modified due to quality-of-care issues, the Participating Provider will be notified of the decision in writing.



3. Provider Credentialing Requirements

A Provider must complete and submit an Alignment credentialing application or participate with the Council for Affordable and Quality Healthcare (CAQH).

If a provider is registered with CAQH, the Provider must authorize Alignment to access their information. Providers may sign up with the CAQH at no cost at <https://proview.caqh.org>.

The information provided to Alignment is verified from primary and/or secondary sources. All Providers must sign the Attestation and Disclosure Statement, in addition to the Authorization and Release Form. The Credentialing Department Staff reviews each credentialing application ensuring that all the following required information is included:

- A current and valid license to practice
- A valid DEA or Controlled Dangerous Substances certificate, if applicable
- Board certification status, if applicable
- Education and training
- Work history
- A history of professional liability claims that resulted in settlement or judgment paid on behalf of the Practitioner.
- The Attestation Questions and Information Release/Acknowledgment forms signed and dated by the applicant. A signature/date stamp is not acceptable to authenticate these documents. An attestation must include:
 - Reasons for any inability to perform the essential duties of the position, with or without accommodation
 - Lack of present illegal drug use
 - History of loss of license and felony convictions
 - History of loss or limitation of privileges or disciplinary action
 - Current malpractice insurance coverage
 - The correctness and completeness of the application
 - The past five years of work history documented and including the beginning and ending month and year for each work experience within that five-year period. Any gaps of more than six months require an explanation from the applicant (for initial credentialing only).

Delegated Participating Providers must have a policy outlining the credentialing requirements for Providers/Practitioners and Healthcare Delivery Organizations (HDOs). The delegated Participating Provider must require that each Provider complete and submit a credentialing application or participate with CAQH. Delegated Participating Providers must ensure that all information is validated through primary or secondary sources, as required by regulatory, accreditation, or Alignment requirements.

4. Professional Liability Insurance

Providers are required to carry and maintain professional and general liability insurance not less than \$1,000,000 per occurrence and \$3,000,000 annual aggregate, or as otherwise stated in their agreement with Alignment.

5. Healthcare Delivery Organization (HDO) Credentialing Requirements (Facilities)

All HDO Participating Providers must meet the credentialing criteria, standards, and requirements of NCQA® (the National Committee for Quality Assurance), the leading health care accreditor, and CMS and be approved by the Alignment Credentialing Committee to participate with Alignment. All HDOs are assessed initially and at least every thirty-six (36) months thereafter. Credentialing may be performed by Alignment or, if delegated for HDO credentialing, the delegated Participating Provider Groups are responsible for the credentialing process.



All HDOs providing health care services to Alignment Members must be credentialed prior to caring for Alignment Members. The following is a list of organizational providers and other health care professionals who require credentialing, recredentialing, and ongoing monitoring by Alignment or the delegated Participating Provider Group.

- Behavioral Health Facilities – Inpatient, Residential, or Ambulatory Setting
- Clinical Laboratories
- Comprehensive Outpatient Rehabilitation Facilities
- Durable Medical Equipment
- Federally Qualified Health Centers
- Free-Standing Surgical Centers (including family planning clinics performing outpatient surgeries)
- Home Health Agencies
- Home Infusion Care
- Hospitals
- Outpatient Diabetes Self-Management Facilities
- Outpatient Physical Therapy and Speech Pathology Therapy Providers
- Outpatient Rehabilitation Centers
- Portable X-Rays
- Rural Health Clinics
- Skilled Nursing Facilities
- Providers for End-Stage Renal Disease Treatment
- Urgent Care Centers

For Participating Providers, an HDO must complete and submit an Alignment credentialing application.

The following items are assessed during the HDO credentialing process. The information provided to Alignment is verified from primary and/or secondary sources. All Providers must sign the Attestation and Disclosure Statement, in addition to the Authorization and Release form, noting:

- The facility is in good standing with state and federal regulatory bodies.
- The facility has been approved by an accrediting body or completed a recent on-site quality assessment if the facility is not accredited. State or federal quality reviews can be used in lieu of an on-site visit if completed within three years.
- Proof of liability insurance as required by the state or as otherwise stated in your agreement with Alignment.
- State license (if applicable).
- City business or city occupancy license (if applicable).

Alignment Participating Providers delegated for (HDO) credentialing, are responsible for validating and assessing the qualifications of HDOs and for confirming their eligibility to participate in state and federal programs.



6. Recredentialing of HDOs

All nondelegated Participating HDOs must undergo recredentialing at least every 36 months, in accordance with regulatory requirements, accreditation, and Alignment's policies and procedures. HDOs will need to complete a recredentialing application, along with the requested documentation to maintain participating-network status with Alignment. The Credentialing Committee will approve, deny, or modify the HDO status according to the established policies. If the recredentialing is denied or modified due to quality-of-care issues, the HDO will be notified of the determination by mail or e-mail and will have 30 days to appeal the decision of the Committee by requesting reconsideration. The HDO will be notified of the decision in writing.

The delegated Participating Provider Group must have policies and processes in place that outline HDO recredentialing to be done at least every 36 months, in accordance with regulatory requirements, accreditation, and Alignment's policies and procedures. Policies should include that HDOs complete a recredentialing application, along with the requested documentation, and that the Credentialing Committee must approve, deny, or modify the HDO status, according to the established policies. The Participating Provider must be notified of the decision in writing if the decision was to deny or modify the Participating Provider's status.

7. The Credentialing Committee

The function of the Credentialing Committee includes provider credentialing, recredentialing and ongoing and periodic performance assessments. The Committee is composed of the Alignment Medical Directors with a quorum of physician voting members. The Credentialing Committee meets monthly (or as the need arises) to determine the participation status of new Providers or those Participating Providers who presently participate with Alignment. The Credentialing Committee maintains the confidentiality of information obtained during the credentialing process and follows all policies and procedures implemented by Alignment.

Alignment reserves the right to coordinate, consolidate, and participate in any Participating Provider disciplinary hearing. Hearings must be conducted in accordance with CMS and NCQA® (the National Committee for Quality Assurance, the leading health care accreditation organization) guidelines, along with any applicable state and federal laws.

8. Nondiscrimination Policy

Alignment does not make credentialing and recredentialing decisions based on the applicant's race, ethnic/national identity, gender, age, sexual orientation, types of procedures, or types of patients in which the Provider or Participating Provider specializes. IPAs/Medical Groups and delegated Participating Provider Groups must also have a policy addressing nondiscrimination with credentialing and recredentialing decisions.

Alignment performs periodic review of Provider or Participating Provider complaints to determine if there are complaints alleging discrimination, if the IPA/Medical Group and delegated Participating Provider Group maintains a heterogeneous Credentialing Committee Membership and requires those responsible for credentialing decisions to sign an affirmative statement to make decisions in a nondiscriminatory manner.

9. Provider Rights

Alignment notifies Practitioners and Providers of their rights to review information submitted to support their credentialing application, to correct erroneous information, and to receive the status of their credentialing and recredentialing application, upon request (see Exhibit 15.1: Providers Rights Notification Form).



If the Participating Provider Group is delegated for credentialing, they must require that all Providers and Participating Providers are notified of their rights, which advises Providers and Participating Providers of their rights to review information.

The Provider rights must include the following:

- Obtained for the purpose of evaluating Providers' and Participating Providers' initial credentialing or recredentialing application This includes nonprivileged information obtained from an outside source (e.g., malpractice insurance carriers, state licensing boards, NPI banks) but does not extend to review of information references or recommendations protected by law from disclosure.
- Submitted to support their credentialing application, to correct erroneous information, and, upon request, to be informed of the status of their credentialing or recredentialing application.
- Providers and Participating Providers have the right to review information submitted to support their credentialing application, to correct erroneous information, and, upon request, to be informed of the status of their credentialing or recredentialing application.

10. Excluded Providers

Alignment or delegated IPAs/Medical Groups/Participating Provider Groups shall not credential or contract with those Providers/Practitioners who are identified on the CMS Preclusion List with active exclusions by the Office of the Inspector General (OIG) via the List of Excluded Individuals/Entities and the System for Award Management (SAM), or Providers that have opted out of Medicare or Medicaid as applicable.

Members are never to be held responsible for those services that are not covered due to this circumstance, and the Providers/Practitioners will not bill Members.

11. Notification of Discrepancy

Participating Providers will be notified in writing, via email, fax, or mail, when information obtained by primary sources varies substantially from information provided on the Provider's and Participating Provider's application. Examples of information at substantial variance include reports of a Provider's or Participating Provider's malpractice claims history, actions taken against a Participating Provider's license/ certificate, suspension or termination of hospital privileges or board-certifying expiration when one or more of these examples have not been self-reported by the Participating Provider on his/her application form. Participating Providers will be notified of the discrepancy at the time of the primary source verification. Sources will not be revealed if information obtained is not intended for verification of credentialing or is protected from disclosure by law.

If a Participating Provider believes that erroneous information has been supplied to Alignment by primary sources, the Participating Provider may correct such information by submitting a written notification to the Credentialing Department. Participating Providers must submit a written notice, along with a detailed explanation, to Alignment within 48 hours of Alignment's notification to the Participating Provider of a discrepancy or within 24 hours of a Participating Provider's review of his/her credentialing file. Upon receipt of notification from the Participating Provider, Alignment will reverify the primary-source information in dispute. If the primary-source information has changed, correction will be made immediately to the Participating Provider's credentials file. The Participating Provider will be notified in writing, via letter or fax, that the correction has been made to his/her credentials file. If after the specified time frame of ten (10) working days the primary-source verification remains in dispute, the Participating Provider will be subject to action under the Fair Hearing Policy in accordance with NCQA® guidelines. This action may include administrative denial or termination. The right to appeal will be provided to Participating Providers for suspension, termination, or nonrenewal of their contracts with Alignment.



NOTE: Alignment may delegate the primary-source verification process to a Credentials Verification Organization and provide appropriate oversight of that function.

Alignment requires that delegated Participating Providers have a policy and process in place to notify Participating Providers in writing, via letter or fax, when information obtained by primary sources varies substantially from information provided on the Participating Provider's application and a process to address the Provider's request for correcting erroneous information supplied by primary sources. Delegated Participating Providers must have a policy and process in place to address the Participating Providers' right to review information submitted to support their credentialing application, to correct erroneous information, and, upon request, to be informed of the status of their credentialing or recredentialing application.

12. Ongoing Monitoring of Sanctions, Complaints, and Quality Issues

Alignment monitors Medicare and Medicaid sanctions, as well as state sanctions, restrictions on licensure or limitations on scope of practice in all states where a Practitioner/Provider provides care to our Members. Monitoring occurs throughout the credentialing cycle.

In addition, Alignment investigates, and monitors Member complaints related to a provider and takes this information into consideration during the recredentialing process. Should a quality issue be identified, and action taken against a Participating Provider, Alignment may report it to the appropriate authorities.

Delegated Participating Provider Groups are required to have a similar policy to ensure compliance with ongoing monitoring, sanctions, and identification of quality issues prior to recredentialing.

13. Appeals and Fair Hearing

When Alignment's Credentialing Committee (or the Delegated Participating Provider's Credentialing Committee) makes a decision to deny or modify, credentialing or recredentialing of a Participating Provider for quality-of-care issues, Alignment and the delegated Participating Provider Group must offer the Provider or Participating Provider a formal appeals process.

Topics 14-16 of this Section are Specifically Intended for Delegated Participating Providers

14. Oversight of Delegated Credentialing

Delegation is a formal process by which an organization gives another entity the authority to perform certain functions on its behalf. Although the organization can delegate the authority to perform such a function, it cannot delegate the responsibility for ensuring that those functions are performed appropriately.

Alignment requires its delegated Participating Provider Groups to credential their own participating Providers. However, Alignment is responsible for monitoring all delegated Participating Provider credentialing and recredentialing activities.

A delegated Participating Provider Group must pass Alignment's Credentialing Department's due diligence (pre-delegation) credentialing evaluation of the structure, processes, and staffing in order to determine its capability to perform the delegated function prior to being delegated for credentialing. Regardless of the Participating Provider/Group credentialing delegation status, Alignment always retains the right to approve new Providers, Practitioners, and sites, as well as to terminate or suspend individual Participating Providers based on credentialing issues.



A delegated Participating Provider Group that has been delegated credentialing responsibility is accountable for credentialing and recredentialing of Participating Providers, even if they subdelegate all or part of these activities. The Participating Provider Group may not subdelegate its delegated credentialing responsibilities unless prior approval is given by Alignment.

If the credentialing and recredentialing activities are delegated, there must be evidence of oversight of the delegated activity. The delegation agreement must meet all the elements of NCQA's standards and be in place as long as the credentialing functions are delegated. As a note, CMS does not recognize NCQA®- non-certified CVOs. As such, all files are subject to full-file CMS review.

15. Delegated Credentialing Committee

Delegated Participating Providers must establish a peer-review process by establishing a Credentialing Committee that includes representation from a range of Participating Providers. The credentialing process can encompass separate review bodies for each specialty (e.g., Practitioner, dentist, psychologist) or a multidisciplinary committee with representation from various types of Practitioners and specialties.

A delegated Participating Provider Group must notify the Participating Provider, in writing, of any adverse actions taken regarding the Participating Provider. The delegated Participating Provider Group must also notify Alignment of any action taken as soon as the delegated Participating Provider has knowledge of the adverse action. The delegated Participating Provider Group must require that the Participating Provider notify the delegated Participating Provider Group of any adverse action taken against the Participating Provider within 14 days of knowledge. For each adverse action, a delegated Participating Provider Group must document the review and actions taken, and the monitoring, and the follow-through of the process, including time frames and closure.

The delegated Participating Provider must promptly notify Alignment, in writing, if any contracted Participating Provider has any adverse action or criminal action taken against the contracted Participating Provider. This must be no later than 14 calendar days from the occurrence of any adverse event, criminal action, changes in privileges, accusation, probation, or other disciplinary action of Participating Providers. Failure to do so may result in the removal of the Participating Provider from Alignment's network.

Participating Providers must not have limitations or restrictions on hospital privileges. Alignment's Credentialing Committee will make decisions based on review of any limitations or restrictions that have been imposed. If a facility should require a proprietary release form in order to release information on a Participating Provider's hospital status, the prospective Participating Provider will be required to complete the required proprietary release form. Failure to do so will be considered noncompliance with the credentialing/recredentialing process.

The delegated Participating Provider Group must review, investigate, and take appropriate action for any adverse events or criminal actions taken against a Participating Provider, including, but not limited to, fair hearings and reporting to appropriate authorities. Based on the delegated Participating Provider Group's findings, Alignment retains the right to take further action, including closing panels to new Membership and/or terminating Participating Providers based on the results of investigations.

Alignment reserves the right to coordinate, consolidate, and participate in any delegated Participating Provider disciplinary hearing. Hearings must be conducted in accordance with CMS, NCQA® guidelines and Applicable state requirements.



The delegated Participating Provider Group must advise Alignment of any changes to its credentialing and recredentialing policies and procedures, processes, delegation or sub-delegation, and criteria within thirty (30) days of the change. If Alignment deems the changed items do not comply with Alignment, NCQA, Department of Managed Health Care (DMHC), Department of Health Care Services (DHCS), and/or CMS requirements, Alignment will notify the delegated Participating Provider Group immediately. The delegated Participating Provider Group will have 30 days to comply. If the delegated Participating Provider Group does not comply, Alignment may de-delegate credentialing and assume responsibility for all, or part of, the credentialing functions.

The delegated Participating Provider Group must provide monthly and quarterly reports to Alignment following the end of each report month with accurate and complete delegated Provider and Participating Provider data. The delegated Participating Provider must provide Board certification status and a Board expiration date, if applicable, when adding a provider to Alignment's network and any updates.

The Delegated Participating Provider Group must use the standardized Health Industry Collaborative Effort (HICE) format and Excel grid¹ to include the following:

- Number of adds/deletes of PCPs, Specialty Care Providers, Mid- Levels: Medical Doctors (MDs), Doctors of Osteopathy (DOs), Physician Assistants (PAs), Nurse Practitioners (NPs), etc.(refer to section 15:1 for full listing of required providers)
- Number of adds/deletes of HDOs: Hospitals, HHC, SNF, CARFs etc. (refer to section 15:5 for full is of required HDOs)
- Numbers of adds/deletes of independent Practitioners: Doctor of Chiropractic (DCs), Doctors of Podiatric Medicine (DPM)
- Any new or revised policies and procedures, additions of a computer system, and Credentialing Verification Organization (CVO)
- Practitioners termed for quality issues

The delegated Participating Provider must ensure that all contracted sites be reviewed in accordance with Alignment, NCQA, DHCS, and CMS requirements. All Participating Providers must have a current and valid (i.e., within three (3) years of the date of initial credentialing and recredentialing) full-scope site review at the time of initial credentialing/recredentialing. Providers contracted only for Medicare must undergo a medical record review.

16. Delegated Participating Provider Policies and Procedures

The delegated Participating Provider Group must have policies and procedures addressing the credentialing of Providers, Practitioners, non-Practitioner health care professionals, licensed independent Practitioners, utilization management Practitioners making medical decisions, and Healthcare Delivery Organizations (HDOs) that fall within in its scope of credentialing. The delegated Participating Provider Group will establish standards, requirements, and processes for the Practitioner/HDOs performing services for Alignment Members to ensure that Providers and HDOs are qualified, licensed, and/or certified consistent with Alignment, NCQA®, the Department of Health Care Services (DHCS), and CMS requirements. These standards, requirements, and processes are applicable whether credentialing and recredentialing activities are delegated.

¹ <https://www.iceforhealth.org/library.asp?sf&scid=1354&scid1354>



SECTION 15.1 PROVIDERS RIGHTS NOTIFICATION FORM

I. Right of Review

A practitioner has the right to review information obtained by Alignment for the purpose of evaluating that practitioner's initial credentialing or recredentialing application. This includes nonprivileged information obtained from any outside source (e.g., malpractice insurance carriers, state licensing boards, National Practitioner Data Bank) but does not extend to the review of information, references, or recommendations protected by law from disclosure.

A practitioner may request to review such information at any time, by sending a written request via letter or fax to the Credentialing Department (see [Exhibit 1](#) for contact information).

II. Notification of Discrepancy

Practitioners will be notified in writing, via letter or fax, when information obtained by primary sources varies substantially from information provided on the practitioner's application. Examples of information at substantial variance include reports of a practitioner's malpractice claims history, actions taken against a practitioner's license/certificate, suspension or termination of hospital privileges, or Board certification expiration when one or more of these examples have not been self-reported by the practitioner on his/her application form. Practitioners will be notified of the discrepancy at the time of primary-source verification. Sources will not be revealed if information obtained is not intended for verification of credentialing elements or is protected from disclosure by law.

III. Correction of Erroneous Information

If a practitioner believes that erroneous information has been supplied by primary sources, the practitioner may correct such information by submitting written notification to the Credentialing Department. Practitioners must submit a written notice (via letter or fax) along with a detailed explanation to the Credentialing Department (see [Exhibit 1](#) for contact information).

Upon receipt of notification from the practitioner, the primary-source information in dispute will be rereviewed. If the primary-source information has changed, correction will be made immediately to the practitioner's credentials file. The practitioner will be notified in writing, via letter or fax, that the correction has been made to his/her credentials file. If, upon rereview, primary-source information remains inconsistent with the practitioner's notification, the Credentialing Department will so notify the practitioner via letter or fax. The practitioner may then provide proof of correction by the primary-source body to the Credentialing Department via letter or fax within ten (10) working days (see [Exhibit 1](#) for contact information). The Credentialing Department will reverify primary-source information if such documentation is provided. If, after ten (10) working days, the primary-source information remains in dispute, the practitioner will be subject to action under Alignment's policy, up to administrative denial/termination.



SECTION 16 PRESCRIPTION DRUG BENEFITS AND PHARMACY SERVICES

Overview

Alignment operates Medicare Advantage Prescription Drug Plans, offering comprehensive pharmacy services, including formulary management, clinical programs, and pharmacy network management. Alignment contracts a pharmacy benefits manager (PBM) company to administer its Part D prescription drug benefit.

1. Formulary

Alignment is committed to covering safe and effective prescription drugs on our formulary, which is a list of drugs covered by Alignment. The formulary is reviewed and approved by the Pharmacy and Therapeutics Committee, which consists of a group of practicing physicians and pharmacists who have expertise in pharmacology and therapeutics. The formulary meets the requirements set by Medicare and has been approved by CMS.

Prescribers are encouraged to adhere to prescribing drugs on formulary, whenever possible, and to review drugs for any applicable utilization management requirements, such as prior authorization, step therapy, and quantity limits prior to prescribing.

2. Part D Resources

Formulary, prior authorization criteria, coverage-determination forms, pharmacy directory, and other resources for the Part D prescription drug plan are available on the Health Plan's website (see [Exhibit 1: Pharmacy](#)).

3. Vaccines

Alignment provides coverage for Part D vaccines, such as the shingles vaccine. To improve vaccine access for Members and reduce their out-of-pocket costs, prescribers are encouraged to provide Members with prescriptions for Part D vaccines to be dispensed and, if applicable, administered at a network retail pharmacy. Members pay the pharmacy the required Part D copayment.

Alternatively, if Members pay the full out-of-pocket charge for Part D vaccines in-office to prescribers, Members must submit a claim for reimbursement from the Health Plan. If the prescriber's charges exceed the Health Plan's allowable charge, the Members must pay the difference.

Some vaccines are considered medical benefits. Flu shots, pneumonia vaccines, and hepatitis B vaccines (for patients at high or intermediate risk) are covered under Medicare Part B. Vaccines directly related to the treatment of an injury or related to direct exposure to a disease or condition are also covered under Part B.



4. Medication Therapy Management Program

Alignment offers a free, voluntary medication therapy management program (MTMP) for eligible Members who have multiple qualifying medical conditions, take many prescription drugs, and have high drug costs that meet a certain dollar threshold. The MTMP offers a comprehensive review of all Members' medications and discusses with Members how to better manage their conditions with drug therapy. It is designed to ensure that covered Part D drugs prescribed to Members are appropriately used to optimize therapeutic outcomes through improved medication use, reduce the risk of adverse events, and improve medication adherence. The MTMP eligible Members' prescriber(s) is/are also provided with recommendations for drug-therapy changes to resolve medication-related problems or to optimize therapy. We also perform targeted-drug-utilization reviews quarterly and may contact Members or their Providers directly if there are questions or recommendations for their medications.

5. Drug Utilization Reviews

We conduct drug-utilization reviews for Members to help make sure they are receiving safe and appropriate care. These reviews are especially important for Members who have more than one Provider prescribing their drugs. We review prescription records on a regular basis to check for potential medication therapy problems, such as duplicate therapy, drug interactions, and safety concerns. If we identify a possible problem, we will work with the Providers to correct the problem.

6. Opioid Overutilization Policies

CMS finalized new opioid policies for Medicare drug plans starting on January 1, 2019. These new Medicare Part D opioid overutilization policies encourage interdisciplinary collaboration, as well as care coordination among Part D plans, pharmacies, prescribers, and patients in improving opioid utilization management, preventing opioid misuse, reducing serious adverse risks, and promoting safer prescribing practices. The new policies include improved safety alerts when opioid prescriptions are dispensed at the pharmacy and drug-management programs for patients determined to be at risk for misuse or abuse of opioids or other frequently abused drugs.

Opioid Safety Alerts

In accordance with CMS policy, Alignment implements opioid safety alerts (pharmacy claims edits) for pharmacists to review at the time of dispensing a medication to prevent the unsafe utilization of drugs. Prescribers are expected to respond to pharmacists' outreach in a timely manner and give the appropriate training to on-call prescribers when necessary to resolve opioid safety edits expeditiously and avoid disruption of therapy. To avoid a prescription being rejected at the pharmacy, prescribers may also proactively request a coverage determination in advance of prescribing an opioid prescription.



Opioid Safety Alert	Prescriber's Role
<p>Seven-day supply limit for opioid-naive patients</p> <p>Medicare Part D patients who have not filled an opioid prescription recently (such as within the past 60 days) will be limited to a supply of seven days or less.</p> <p>Limiting the amount dispensed with the first opioid prescription may reduce the risk of a future dependence or overuse of this drug.</p>	<p>Patient may receive up to a seven-day supply or request a coverage determination for a full-day supply as written.</p> <p>The physician or other prescriber has the right to request a coverage determination on the patient's behalf, including the right to request an expedited or standard coverage determination in advance of prescribing an opioid.</p> <p>The prescriber needs only to attest to the Health Plan that the day's supply is the intended and medically necessary amount.</p> <p>Subsequent prescriptions written by prescribers are not subject to the 7-day supply limit, as the patient will no longer be considered opioid-naive.</p>
<p>Opioid care coordination alert at 90 morphine milligram equivalent (MME)</p> <p>This policy will affect Medicare patients when they present an opioid prescription at the pharmacy and their cumulative MME per day across all of their opioid prescription(s) reaches or exceeds 90 MME and there is utilization from more than two pharmacies and two prescribers.</p> <p>The prescriber will be contacted to resolve the alerts and to be informed of other opioid prescribers or increasing level (MME) of opioids.</p> <p>This is not a prescribing limit. Decisions to taper or discontinue prescription opioids are individualized between the patient and prescriber.</p>	<p>Regardless of whether individual prescription(s) is/are written below the threshold, the alert will be triggered by the fill of the prescription that reaches the cumulative threshold of 90 MME or greater.</p> <p>The prescriber who writes the prescription will trigger the alert and will be contacted even if that prescription itself is below the 90-MME threshold.</p> <p>Once a pharmacist consults with a prescriber on a patient's prescription for a plan year, the prescriber will not be contacted on every opioid prescription written for the same patient after that, unless the plan implements further restrictions.</p> <p>On the patient's behalf, the physician or other prescriber has the right to request a coverage determination for a drug(s), including the right to request an expedited or standard coverage determination in advance of prescribing an opioid.</p>
<p>Concurrent opioid and benzodiazepine use or duplicative long-acting opioid therapy</p> <p>The alerts will trigger when opioids and benzodiazepines are taken concurrently or if on multiple duplicate long-acting opioids.</p>	<p>The pharmacist will conduct additional safety reviews to determine if the patient's opioid use is safe and clinically appropriate. The prescriber may be contacted.</p>

7. Drug Management Programs

If a Member is identified as being potentially at risk for prescription drug abuse, as part of the case management process, Providers who prescribed opioids and benzodiazepines will be contacted for clinical information needed in order to make a decision on whether the Member is at risk and should have his/her access to frequently abused drugs limited. Prescribers are expected to respond when contacted for information about a Member's prescription use history.



8. Diabetic Supplies

Alignment covers finger-stick blood glucose monitors, test strips, and lancets, with a prescription, at any network retail or mail-order pharmacy.

FreeStyle is the preferred brand of diabetic supplies; providers are requested to prescribe FreeStyle-brand diabetic supplies to the Member's pharmacy of choice. Alignment follows Medicare-defined quantity limits for a maximum testing frequency of three (3) times per day for patients on insulin. Dispensing of test strips is limited to three (3) test strips per day, up to 100 test strips per 30 calendar days, one box at a time. For a nonpreferred diabetic supply brand other than FreeStyle and/or a higher testing frequency, Providers are required to submit an authorization request to the Alignment Utilization Management Department for review of coverage, explaining the medical necessity of the request. Providers can submit diabetic supply authorization requests via AVA® [Exhibit 1: Utilization Management](#)).³

9. Prescription Claims Payments

All prescription claims payments are subject to retrospective review to determine whether Participating Provider financial liability exists and to pursue recovery, where such liability is determined to exist. In the event a Participating Provider orders medication through Medicare Part D, the prescription drug benefit which is customarily covered under the Medicare Part B medical coverage, such as intravenous/ intramuscular medications that are typically administered by a health care professional, Alignment may deduct such costs from the Independent Physician Association's capitation payments. For medications that are deemed Alignment's risk, and if the medication has a biosimilar available on the market, claims for that medication will be paid at the lowest available biosimilar rate.⁴

³ Applicable to Alignment Health Plan only. Not applicable to FirstMedicare Direct.

⁴ Applicable to Alignment Health Plan only. Not applicable to FirstMedicare Direct.



SECTION 17 STARS PROGRAM

Overview

Alignment's Stars team works with Participating Providers toward achieving a five-star rating from the Centers for Medicare & Medicaid Services (CMS). These ratings are based on Healthcare Effectiveness Data and Information Set (HEDIS®) data, Health Outcomes Survey (HOS), Consumer Assessment of Healthcare Providers and Systems (CAHPS) surveys, pharmacy data, and administrative outcomes. Alignment's Star Quality Rating program supports CMS' goal to improve the Medicare beneficiary access to quality services through driving a level of accountability in the care provided by physicians, hospitals, IPAs/Medical Groups, other Participating Providers, and health plans.

1. Healthcare Effectiveness Data and Information Set

HEDIS® is a set of comprehensive standardized performance measures developed and maintained by the National Committee for Quality Assurance (NCQA) and adopted and used by CMS in connection with the Medicare Five-Star Quality Rating system. HEDIS® measures are designed to provide a reliable comparison of health plan performance. Examples of HEDIS® measures include preventative screenings, chronic care management, SNP-specific metrics, and other clinically focused measures. Current Quality gap lists for specific Members are available in AVA® or can be sent to individual IPAs and Participating Providers via sFTP throughout the year. Quality Performance metrics are also available in AVA®. IPAs/Medical Groups and/or Participating Providers will be held accountable to satisfy the Quality Covenants in their agreement. Participating Providers are expected to close care gaps by the end of the measurement year for:

- Colorectal Cancer Screening
- Breast Cancer Screening
- HbA1c Control ≤9Retinal Eye Exam
- Kidney Health Evaluation for Patients with Diabetes
- Osteoporosis BMD/medications after a fracture (within 6 months)
- Controlling High Blood Pressure <140/90
- Adherence for appropriate statin use for Members with cardiovascular disease
- Transitions of Care
- Transition of Care Notification of Inpatient Admission
- Transition of Care Receipt of Discharge information
- Medication reconciliation 30 days post-discharge
- Transition of Care Patient Engagement after Discharge
- Follow Up After Emergency Department Visit for People with Multiple Risk Chronic Conditions
- Plan All Cause Readmission
- Care of Older Adults(SNP members)
- Medication Review (annually) Pain Assessment (annually)



Gaps are closed through administrative data (claims/encounters), hybrid (medical record) data, and/or supplemental files provided by IPAs/Medical Groups and/or Participating Providers. As a partner, Alignment requires regular and routine quality data submissions all year long. During HEDIS Audit (i.e., Jan-April) medical record requests will be made, and the expectation is for IPAs/Medical Groups and/or Participating Providers to provide charts as requested.

2. Health Outcomes Survey (HOS)

The (HOS) is a Member-reported outcomes survey used in Medicare managed care. The goal of the HOS is to gather valid, reliable, and clinically meaningful health-status data from the Medicare Advantage program to use in quality improvement activities and program oversight and to improve health outcomes. The HOS survey to Members includes questions about their mental and physical health over time, as well as the discussions they have had with their health care providers around fall risk, physical activity, and urinary incontinence. Discussing these items with Alignment Members, your patients, will help ensure a higher quality of life while aging:

- IMPROVE physical health by establishing health interventions when clinically appropriate, such as monthly physical therapy, setting weight-loss, fitness, and mobility goals. Alignment's ACCESS On-Demand Concierge team is available to provide a list of no-cost gym memberships to help Members reach these goals as part of their care plan.
- IMPROVE health habits with goal setting and action plans to help Members take active roles in improving their health. Set follow-up appointments for goal check-ins.
- IMPROVE emotional health by educating Members on staying positive, practicing mindfulness, getting enough sleep, eating healthy, limiting alcohol, and staying connected with loved ones.
- IMPROVE mental health by referring Members to behavioral health services when clinically appropriate.
- IMPROVE physical health by setting weight-loss, fitness, and mobility goals. Alignment's ACCESS On-Demand Concierge team is available 24/7 (see [Exhibit 1: ACCESS On-Demand Concierge](#)) to provide a list of no-cost gym memberships to help Members reach these goals.
- IMPROVE self-sufficiency by referring Members with limited or decreased mobility to physical therapy to learn safe/effective exercises.
- IMPROVE Member understanding of how to control incontinence by educating them on treatment options such as medication, engagement in bladder training exercises, or surgery.
- IMPROVE Member safety by reducing fall risk. Encourage Members to remove throw rugs, clutter, and tripping hazards. Advise on proactive solutions such as handrails on stairways, grab bars in bathrooms, non-slip shower mats, and use of nightlights throughout the home.
- IMPROVE financial well-being. Alignment's ACCESS On-Demand Concierge team is available to provide Members with their over-the-counter (OTC) allowance for help with obtaining personal care items, hearing aids, or other health supplies.

3. Consumer Assessment of Healthcare Providers and Systems (CAHPS) Survey

The CAHPS survey is a Member experience survey that asks them to rate their experiences with the Health Plan, drug plan, Providers, coordination of care, and access to care. Incorporating the following practices will improve the Member's experience and promote high-quality patient care:

- ALWAYS reserve daily time blocks for walk-in and urgent same-day appointments ensuring your Members that you are ALWAYS there for them.



- ALWAYS provide the phone number for a 24/7 or after-hours Urgent Care facility on your answering service. The Alignment Health Plan Concierge team is also available 24/7 (see [Exhibit 1: ACCESS On-Demand Concierge](#)).
- ALWAYS set expectations for in-office wait time by providing Members with estimated wait time and updates during check-in; this can improve perceived wait time.
- ALWAYS have the Member leave the office with helpful materials in-hand such as an appointment reminder card or copy of a referral. These resources will help to decrease delays in care and improve perception of getting care as soon as needed.
- ALWAYS have the office staff assist in scheduling a specialty appointment or follow-up visit prior to the Member leaving the office.
- ALWAYS review/update the Member's medication list at every visit. Make sure the Member understands the prescribed medications and encourage adherence.
- ALWAYS set expectation with Members on receiving their test results. Set a practice goal to communicate test results to patients within 24 hours of receipt.
- ALWAYS ask the Member if they have any questions and address any additional concerns before the end of the appointment.

Alignment conducts internal member surveys to improve Member satisfaction and experience, and for quality improvement purposes. Surveys may be conducted through mail, email, text, phone, or a combination of modalities. Types of surveys include, but are not limited to:

- Proxy CAHPS surveys
- Proxy HOS Surveys
- Post-Visit Surveys: a survey fielded to Members after a primary care visit for which Alignment has received a claim or encounter

4. Administrative Measures

CMS also measures Alignment on administrative measures related to process performance. These results include responsiveness to appeals, call center-monitoring audit scores, and Member voluntary disenrollment numbers. Health plans are also evaluated on prescription drug adherence for certain medications. Alignment ensures that Members can easily access these drugs by placing them on the lowest formulary tier. IPAs/Medical Groups and/or Participating Providers are expected to direct Members to the Alignment Health Plan Concierge team for assistance (i.e., disenrollment, benefits, marketing misrepresentation, claims processing, etc.) prior to outreaching to CMS (see [Exhibit 1: ACCESS On-Demand Concierge](#)).

For additional information, please review Alignment's Medicare Stars Program Best Practice Guide (see [Exhibit 1: General Resources](#)). This detailed guide is a valuable resource for learning about the Stars measures, data requirements, and improvement processes.

To learn more about your Stars scorecard, best practices, improvement ideas, and the Stars program, email the Stars team (see [Exhibit 1: Stars](#)).



SECTION 18 RISK ADJUSTMENT AND CODING

Overview

Risk adjustment is a process that CMS uses to reimburse Medicare Advantage plans based on the health status of Members. Risk adjustment ensures that CMS pays health plans appropriately for Members' expected health costs based on their overall health status and demographic information. To ensure we accurately document our member's health status, Alignment will perform a Comprehensive Annual Health Assessment with our members. This assessment is intended to identify chronic diseases, modifiable risk factors, and urgent health needs. Additionally, we will delegate responsibility for this function to participating IPAs / Medical Groups or PCPs to complete as part of an Annual Wellness Visit (see [Section 13: Annual Wellness Visit](#)), compliant with CMS requirements.

1. P360 Tool

Alignment's P360 is a clinical point-of-care tool designed to provide the Participating Providers with current data regarding their Members, including chronic year-over-year diagnoses, probable or suspected conditions, HEDIS® and other quality care gaps, hospitalizations, lab results, pharmaceutical history, and recently reported diagnosis codes.

Alignment makes these forms available to the Participating Provider on the Alignment Health Plan Provider page (see [Exhibit 1: General Resources](#)). These forms are updated on a frequent basis. The Participating Provider is responsible for providing these forms to their contracted providers with Alignment Membership.

2. Medical Record Documentation Requirements

In accordance with documentation guidelines, all medical record notes must be complete and legible. The medical record should include the following:

- Reason for the visit
- Relevant history
- Physical exam
- Prior diagnostic test results
- Assessment, clinical impression, or diagnosis
- Plan of care (for each diagnosis listed in the assessment and/or being submitted)
- Date of encounter
- Clinician name and credentials
- Signature
- If diagnostic tests or ancillary services are ordered, the diagnosis should be documented or the reason for ordering them should be easily inferred from the documentation
- The past and present diagnoses for the patient should be included in the documentation or listed in a separate, accessible form
- Appropriate health risk factors should be identified
- Progress, response to, and/or changes in treatment, and any revision in the diagnosis should be documented



- The diagnosis and treatment codes reported on the claim form should be supported by the documentation. Documentation should be completed during the encounter, immediately following the encounter, or as soon as reasonably practicable after the encounter. Documentation should not exceed five (5) business days beyond the date of service

3. Risk Adjustment Submissions

All data required for submission for CMS sweep periods must be submitted to Alignment in a timely manner, to allow processing and error corrections.

The table below references the CMS Sweep Data Collection period and the IPA/Medical Group submission timeline, as well as Alignment's timeline to submit to CMS. Alignment will take data up to ten (10) business days prior to a sweep but cannot guarantee that the files will be processed if submitted after the initial cutoff date listed below. The Participating Provider is responsible for ensuring that all data submitted to Alignment is accurate and complete and is documented in a compliant medical record from an acceptable provider type. (See Program Resources in this section for link) (42 CFR 422.310 – Risk adjustment data (d)(4)).

Risk Score Run	Dates of Service	IPA/Medical Group Submission Deadline to Health Plan	Health Plan Deadline to Submit to CMS
2023 Initial	07/01/2021 – 06/30/2022	Friday, 08/19/2022	Friday, 09/02/2022
2022 Interim Final Run	01/01/2021 – 12/31/2021	Tues, 01/17/2023	Tues, 01/31/2023
2023 Mid-Year	01/01/2022 – 12/31/2022	Friday, 02/17/2023	Friday, 03/03/2023
2022 Final Run	01/01/2021 – 12/31/2021	Monday, 06/19/2023	Monday, 07/31/2023

Dates subject to change dependent on updates of CMS calendar.

4. Quality and Compliance

Participating Providers are required to provide legible documentation for the encounter, as outlined under [Medical Record Documentation Requirements](#). If the medical record is handwritten, it must be legible. All codes submitted for reimbursement must be supported by the documentation. Documentation should be complete and written in a manner in which anyone can easily understand why the patient was seen and/or what the patient was treated for on that date. Participating Providers should document to the highest specificity possible to ensure accurate code assignment. Medical records that are illegible will not support the encounter.

Late entries, addenda, and corrections should be done only when necessary and not as a normal part of documentation.

- **A late entry** supplies additional information that is not included in the original documentation. It must be dated and used only when necessary.
- **An addendum** is used to provide additional information that was not available during the original encounter. The entry must be dated and include the reason for the addendum.
- **A correction** to handwritten records must have a single line through the incorrect information. The correct information should be entered, and the entries must be initialed and dated. DO NOT use correction fluid or black out, and DO NOT erase, or otherwise, cover up the incorrect entry.

Medical record documentation should be completed during the encounter, immediately following the encounter, or as soon as reasonably practicable after the encounter. Documentation should be completed no later than five (5) business days after the date the service is rendered. Documentation must be dated and include a legible signature along with credentials.



5. Historical Data

Alignment utilizes both current and historical data to be proactive in the care of our Members. Accurate and complete data supports Stars and Risk Adjustment outcomes and helps to improve the overall Member experience.

Participating Providers are encouraged to work with their Alignment Provider Relations Representative for current submission format requirements ([Exhibit 1: Network Management/Provider Relations](#)). The below grid provides some examples of the types of data submissions.

Layout Name	Description
Member Eligibility Data	Data Attributes for Member
Provider Data	Data Attributes for Provider
Claims Encounter Data	Data Attributes for Claims
Rx Data	Data Attributes for Pharmacy
Lab Data	Data Attributes for Lab
HEDIS Result	Data Attributes for HEDIS Part C Measures
HEDIS Med Adherence	Data Attributes for HEDIS Part D Measures
Authorization	Data Attributes for Authorization
MOR	Standard CMS Template for Monthly Output Report
MMR	Standard CMS Template for Monthly Membership Report
RAPS Return	Standard CMS Template for RAPS Return
MA0-004	Standard CMS Template for EDS Return

6. Retrospective Chart Review

Alignment may conduct a retrospective chart retrieval and coding initiative on an annual basis.

For our nondelegated Participating Providers, Alignment will coordinate efforts to retrieve and code medical records. The cost for copying medical records is the responsibility of the Participating Provider. The Participating Provider is responsible for ensuring that all data submitted to Alignment is accurate, complete, and documented in a compliant medical record from an acceptable provider type (see Program Resources in this section for link) (42 CFR 422.310 – Risk adjustment data (d)[4]).

Delegated Participating Providers are responsible for retrieving, accurately coding their medical records, submitting accurate and complete data in a timely manner to Alignment. Typically, Alignment does not pay record-copying fees when obtained for the purposes of a medical record review. The IPA/Medical Group is responsible for ensuring that all data submitted to the Health Plan is accurate and complete and is documented in a compliant medical record from an acceptable provider type (see Program Resources in this section for link) (42 CFR 422.310 – Risk adjustment data (d)[4]).

7. Coding Practices and Procedures

Participating Providers are expected to comply with all CMS guidelines when evaluating and documenting diagnoses. A Member's medical record must always support the associated diagnosis coding that is submitted to Alignment. Should a CMS Risk Adjustment Data Validation audit find that medical-coding standards are not being met, the Participating Provider may be responsible for penalties imposed by CMS.



8. Program Resources

- Medicare Advantage Encounter Data and RAPS Data (CMS Customer Service and Support Center): [Acceptable Physician Specialty Types by Payment Year](#)
- CMS: [Medicare Risk Adjustment Eligible CPT/HCPCS Codes](#)
- CMS: [Medicare Risk Adjustment Information](#)
- CMS Medicare Learning Network: [Evaluation and Management Services](#)
- CMS Medicare Learning Network Fact Sheet: [Complying With Medical Record Documentation Requirements](#)
- CMS Medicare Learning Network Fact Sheet: [Complying With Medicare Signature Requirements](#)

9. Education

For HCC educational materials, contact Alignment via Alignment Health Plan's Provider page (login needed) or our HCC email address. (See [Exhibit 1: Risk Adjustment](#) and [Exhibit 1: General Resources](#), respectively).



SECTION 19 FINANCIAL AND CONTRACTUAL

Overview

Alignment's Finance Department monitors its Participating Providers to ensure that they are financially viable and solvent and have the ability to pay timely claims submitted by their contracted Providers on behalf of Alignment Members and in accordance with the law. This policy encompasses all Participating Providers to whom financial risk has been contractually delegated by Alignment.

1. Financial Requirements

The Participating Provider is required to maintain adequate financial reserves, working capital, and contingency plans sufficient for prudent and sound operations and that are satisfactory to Alignment and government agencies. Alignment will monitor financial viability of its contracted entities. For the purpose of this section, Financial Statements shall be defined as copies of audited annual and audited or unaudited quarterly financial statements, which shall include a balance sheet, statement of income, and a statement of cash flow ("Financial Statements") prepared in accordance with generally accepted accounting principles (GAAP). All such Financial Statements shall be certified by the Participating Provider's Chief Financial Officer, as accurately reflecting the financial condition of the Participating Provider. The Participating Provider shall provide to Alignment, no later than forty-five (45) calendar days following the end of each of the Participating Provider's fiscal quarters, quarterly Financial Statements for the immediate prior three-month period. Annually, the Participating Provider shall provide Alignment with copies of the Participating Provider's audited annual Financial Statements for the most recent fiscal year-end, along with an opinion letter on these statements from the accounting firm that completed the audit on these Financial Statements. Said Financial Statements shall be provided to Alignment no later than one hundred and fifty (150) calendar days after the close of the Participating Provider's fiscal year. Alignment also agrees to maintain these statements in a confidential manner. The Participating Provider will provide the following:

- A statement as to whether it has estimated and documented, on a monthly basis, its liability for Incurred But Not Reported (IBNR) claims pursuant to a method specified in Title 10, CCR Section 1300.77.2. If the estimated and documented liability has not met the requirement in any way, the statement shall be accompanied by a report that describes in detail the nature of the reason for the deficiency and action taken to correct the deficiency and the results of that action. This document is the Corrective Action Plan (CAP).
- A statement as to whether the Participating Provider has, at all times, during the quarter maintained a positive Tangible Net Equity (TNE) and positive working capital according to GAAP. If not, the statement shall be accompanied by a report describing in detail the nature of the deficiency, the reason for the deficiency, action taken to correct the deficiency, and results of that action. The Participating Provider may reduce its liabilities for purposes of calculating its TNE and working capital in a manner allowed by the Safety Code 13775.4(b)(1) (B). With reference to Health and Safety Code 13775.4(b)(1)(B), a sponsoring organization shall have a TNE of at least twice the total of all amounts that it is guaranteed to all persons or entities, or a TNE in an amount approved and met by the compliance guidelines established by law.
- Written verification attached to each report stating that the report is true and correct to the best knowledge of the Chief Financial Officer of the Participating Provider and is signed by the Chief Financial Officer.

Outcome and financial status of the Participating Provider will be discussed at Alignment's quarterly Delegation Oversight Committee meetings.



2. Shared Risk Fund Settlements

The shared-risk fund settlements reports are prepared by Alignment's Finance Department and forwarded to each Participating Provider electronically, based on the terms of the contract. The reports contain the shared-risk fund settlement summary, claims data, and Part B drugs data. The Participating Provider has a specified period in the contract during which to respond with any inquiries or any disagreement with the reports.