

Reporting Independent Review Organization (IRO) Cases

For Carriers: How to Request and IRO Assignment and Submit Results

January 4, 2016



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Introduction

As part of the appeal and grievance procedures, an enrollee of a carrier may request an independent review upon receiving a second level appeal denial of benefits. The reason for the enrollee's request can be medical necessity of services, treatment involving experimental or investigational therapies, or contractual coverage disputes. In Washington, enrollees request a review by an Independent Review Organization (IRO) through their health plan and upon receiving that request, the health plan processes the assignment of the case to an IRO through the Office of the Insurance Commissioner's (OIC) on-line assignment system (the OIC portal).

The ultimate goal throughout the process is to provide transparency of the independent review process to interested parties. Use of the portal will improve the process for requesting and reporting IRO decisions and enable consumers to self-serve by publishing an online, searchable, publicly accessible database of IRO decisions.

Requirements and Implementation

The OIC will continue to enforce the reporting requirements for external reviews of adverse benefit determinations by carriers and health plans, as required under RCW 48.43.535, WAC 284-43-550, and WAC 284-43-630. These statutes and rules require that within three business days of the enrollee's request the carrier must assign an IRO to the dispute and must submit the final IRO decision determination to the OIC portal within three days of the receipt of the final decision. In order to fulfill these requirements, the establishment of the portal allows for electronic request of the IRO and for electronic submission of the outcome of the dispute. In addition, the portal allows carriers to electronically track the rotational registry system of certified IRO's established by the commissioner.

This portal will provide a tool for the OIC staff, carriers, and providers to more efficiently review IRO decisions. Starting January 3, 2016, assignments and reporting will shift to the OIC's website where the following features will be offered:

- IRO Assignments:
 - Carriers log in and receive the next IRO assignment in their rotational registry
 - o Allows carriers to request waivers in certain cases
- Reporting IRO Decisions
 - Carriers can log in, select pending cases, and report the IRO's decision.
 - The carrier has access to all open and closed IRO decisions and grants access to multiple users, as designated by the company.
- Online Access
 - Will allow consumers, providers, and carriers to search the IRO data, based on defined selection criteria
 - Case details of the IRO decision will be available for viewing
 - Statistical reporting on the IRO data.



Carrier's Primary Contact for Reporting Independent Review Decisions

Before a company can begin submitting requests for IRO assignments, they must first designate a primary contact who will control the company's primary log in and will be responsible for granting access to secondary users. The primary contact will receive the following email which will grant access to the OIC portal.



To designate a primary contact, please email MarketConductOversig@oic.wa.gov or call (206) 389-2916.

Getting Started

Upon receiving a request from the enrollee for an external independent review, the carrier will need to log on to the OIC's website to obtain the proper IRO assignment. The following is a guideline for properly accessing these items through the OIC's website and portal.

Logging in through the OIC's Website

The portal may be accessed on-line at: http://www.insurance.wa.gov/

- Click on the "For Insurers" tab
- Under "Market Conduct", click "Independent Review Organization (IRO) assignments"
- Click on the "File online" tab



The Login Screen

Upon entering the portal for the first time, both primary and secondary users will be required to change the password provided to the user via the OIC's automated email. After the password has been changed the user will be directed to the portal's login screen when entering the portal. All passwords are securely stored and are only available to you.

OFFICE of the INSURANCE COMMISSIONER WASHINGTON STATE		Home	About OIC	Connect with us	Laws & rules	Logout
Change Passw	ord					
XYZ INSURANCE COMPAN WAOIC #: 000 NAIC #	Y #: 00000					
Password must be between 8 and 16	characters, and must have at least tv	/o numbers and on	e letter.			
Temporary Password						
New Password		Confirm New	Password			
	Change	Password				
Help	Connect with us	Laws & rules		About O	IC	
Need some help?	Email Market Oversight	RCW <mark>(</mark> laws) & W	/AC (rules)	What we	e do	



OFFICE of the INSURANCE COMMISSIONER WASHINGTON STATE		About OIC	Connect with us Laws & rules Log in	1
Independent Revie	ew login			
User Name				
Password				
Forgot Password?	Log In			
Help	Connect with us	Laws & rules	About OIC	
Need some help?	Email Market Oversight	RCW (laws) & WAC (rules) Proposed rules Recently adopted rules Report fraud	What we do Newsroom About Mike Kreidler	

If there are any questions, or if problems occur when logging in to the portal, click on the *Help* link at the bottom of the page and you will be directed to a screen which will provide contact information for assistance to help the user log in. In the event that the user forgets their password, click the "Forgot Password?" link and the user will be able to send themselves a new password.

OFFICE of the INSURANCE COMMISSIONER WASHINGTON STATE		About OIC	C Connect with us	Laws & rules	Log in
Forgot Passwor	ď				
Please enter your contact information	then click on 'Submit' to receive your	new password.			
Login Name					
Email					
	Cancel	Submit			
Help	Connect with us	Laws & rules	About OI	С	
Need some help?	Email Market Oversight	RCW (laws) & WAC (rules) Proposed rules Recently adopted rules Report fraud	What we Newsroo About Mi	do m ke Kreidler	



The Home Screen

OFFICE of the INSURANCE COMMISSIONER WASHINGTON STATE	Home About OIC	Connect with us Laws & rules Logout					
Independent Review Decisions XYZ Insurance Company WAOIC #: 000 NAIC #: 00000							
Search Independent Reviews By Status	All Find Open Closed	Request a New Review					
Assignment # 🗢	Assigned Date 🗢	Status 🗢					
+ 30	11/25/2015	Open					
+ <u>31</u>	11/25/2015	Open					
ACCOUNT SETTINGS Secondary User Update Contact Information Change Password							

Once the primary contact has changed the password, the Home Screen will appear. The Home Screen is where the user can find links to perform the following tasks:

- Request IRO Assignments
- Report Final IRO Details
- Update Contact Information
- Change the User Password
- Search Independent Reviews by Status

As a reminder, there will be no data in the database when this system goes live in January, 2016. Data will populate as each user enters IRO decision determination information into the system.

Updating Contact Information and Secondary Users

Under menu options located on the left side of the Home Screen, the primary contact will find links that will allow for updating user contact information and will provide the primary contact with the opportunity to establish secondary users. Secondary users will be able to access the portal, request IRO assignments, and report independent review outcomes. As a reminder, the user logged on during the reporting process is attesting that the electronic filing represents an accurate, and complete statement of the information required to be provided to the OIC pursuant to IRO reviews.



A key feature of the portal is the ability of the primary contact to add and remove secondary users. The primary contact can add secondary users and allows carriers to designate individuals within their company to request an IRO and enter IRO decision data into the system while having the portal track the individual entering the information.

Home Screen Utilization

Once the Home Screen has been accessed, the carrier has access to a variety of features:

- > Ability to sort assignments by the status of the independent review (open, closed, all).
- ➢ View search results and export search results to Excel.
- View assignment details (Assignment #, IRO name, date assigned, status, type of review, and resolution).

Creating a Request to Assign an Independent Review Organization

When the primary contact or a secondary user hits the "Request an IRO" tab, the individual will be directed to the Initial IRO Request screen where the carrier's next IRO in their rotation will appear.

The Initial IRO Request screen also contains two required entries and they are located under "Independent Review Details". In this portion of the request, the carrier will be asked to identify the type of review, reviews will be classified as expedited or standard. Also, the OIC requests from each carrier the date the enrollee requested the independent review which is defined as the date the carrier receives notification from the enrollee that they would like an independent review. Once the required information is completed, click the "Request IRO" tab and the assignment will be completed.

OFFICE of the INSURANCE COMMISSIONER WASHINGTON STATE								
Independent Re	eview Request							
XYZ Insurance Company WAOIC #: 000 NAIC #: 0	00000							
Independent Review Details								
Type of review		Date enrol	lee requested	d review				
Select an Item	\checkmark							
IRO Assigned Medical Review Institute of A	merica, Inc	Request \	Vaiver					
Cancel Request IRO								
Help	Connect with us	Laws & rules		About O	OIC			
Need some help?	Email Market Oversight	RCW (laws) 8	WAC (rules)	What we	e do			
		Proposed rule	s	Newsro	om			
		Recently ado	oted rules	About M	like Kreidler			
		Report fraud						



OFFICE of the INSURANCE COMMISSIONER WASHINGTON STATE		Home Abou	ut OIC Connect with us	Laws & rules	Logout
Independent Review Re	quest				
XYZ INSURANCE COMPANY WAOIC #: 000 NAIC #: 00000					
Independent Review Details Type of review	Date	enrollee requ	uested review		
IRO Assigned Virginia Health Quality Center	R	equest Waiver			
Waived Independent Review Organization(s)	Reason for Waiver	Description			
IPRO	Conflict of Interest	Select an Ite	m		~
IMEDECS	Other 🗸	Enter text her	e for "Other" explanation		
	Cancel Req	uest IRO			
Help Connect with us	Laws	& rules	About O	IC	

The initial request screen is also where a request for a waiver of the IRO would be entered. A waiver can be requested if there is a conflict of interest. Conflicts of interest should fall under the following descriptions:

- ▶ IRO is a subsidiary of Carrier
- ➢ IRO owned by Carrier (5% or greater)
- ➢ IRO received financial incentive for decision
- ➢ IRO receives incentive to promote product/service
- ➢ IRO known familial relationship with Carrier
- ➢ IRO prior involvement in case under review

If the reason for the waiver does not fall under the guidelines for a conflict of interest, please provide a description as to why a waiver is needed.

Once the "Request IRO" option is chosen, the user will be taken to the Independent Review Request Confirmation screen. The user will find the assignment number, the IRO assigned, the IRO certification #, IRO contact information, and page options to either "Add another" or return to the Independent Review home page.





Reporting Final Resolution of the Independent Review

Upon receiving the IRO's decision, the carrier will return to the portal to complete the details of the independent review. On the Home Screen, the user clicks the link under for the corresponding assignment number and will then be taken to the Independent Review Decision screen. The following items will be requested and are necessary to properly report the facts of the independent review (items in gray on the screen are details previously submitted in the initial request). The required fields are defined as the following:

- Date carrier acknowledges receipt of request by enrollee: The date the carrier confirms receipt of the IRO request and notifies the enrollee.
- Date carrier notifies enrollee of IRO contact information: The date the Enrollee/Appellant was notified by the carrier of name and contact information of IRO.
- Date carrier provides the IRO with complete file documentation: All file documents carrier used in decision has been provided to IRO. Per RCW 48.43.535(4), must include enrollee medical records, documentation used by the carrier in making the determination, documentation used by the carrier in making the determination, and a list of the enrollees physicians or health care providers who may have records relevant to the appeal.

The sections that follow address the issue under review, the plan details, enrollee information, and information and timelines regarding the outcome of the independent review. The definitions for each field can be found in the table below.



If the chosen field selected requires an explanation, such as Contractual Coverage Dispute, than a text box (titled *Subject of the Dispute* for Contractual Coverage Dispute) will populate for further explanation. Continuing on through the IRO reporting process, the carrier will need to fill out the required fields and select drop-down options as required.

The following screens display the last steps in completing the independent review reporting process.

OFFICE of the INSURANCE COMMISSIONER WASHINGTON STATE	Home About OIC Connect with us Laws & rules Logout
Independent Review Decision	
XYZ INSURANCE COMPANY WAOIC #: 000 NAIC #: 00000	
Review Assignment Number 182	Date IRO Assigned 12/14/2015
IRO Assigned IPRO	
Independent Review Dates	
Type of Review	Date the enrollee requested review
Standard	12/02/2015
Date carrier acknowledged receipt of request by enrollee	Date carrier notified enrollee of IRO contact information
Date carrier provided the IRO with complete file documentation	
Leaves and Plan Details	

Issues and Plan Details Reason for request Contractual Coverage Dispute
Subject of dispute
Policy Type
Select an Item
Diagnosis (optional)
Diagnosis Subcategory
(Optional)
Disputed Treatment (Procedure Code) (optional)



Enrollee Information		
Enrollee Age	Gender	
	Select an Item	~
Was covered person limited English proficient?		
Select an Item		
Independent Review Decision		
Independent review final resolution	Date IRO completed review or closed file	
Select an Item		
Date the carrier was notified by the IRO of final resolution	Date the enrollee was notified of final resolution	_
Date the carrier closed the file		
Decision Rationale from IRO		
		~
		\sim
Important: Do not provide confidential natient information		
importante do not provido confidential patient information.		

pecialty, credentials and qualification of reviewer(s)
^
×
nportant: Do not identify reviewer by name.
Declaration
ly submitting these documents electronically to the WA State Office of the Insurance Commissioner, Company Supervision ivision, I understand, agree and certify on behalf of TIME INSURANCE COMPANY (NAIC #69477):
. I, Primary Contact am authorized to submit a request for an Independent Review Organization (IRO) assignment.
. To the best of my knowledge the electronic filing represents an accurate, and complete statement of the information required be provided to the Office of the Insurance Commissioner pursuant to IRO reviews.
Cancel Submit final decision
Help Connect with us Laws & rules About OIC



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Independent Re	Independent Review Final Confirmation								
XYZ INSURANCE COMPANY WAOIC #: 000 NAIC #:	(: 00000								
Thank you for submitting the final review d	lecision for assignment number 182 .								
What would you like to do next?									
Add another Independ	dent Review request.								
Return to your Indepe	ndent Review home page.								
Help	Connect with us	Laws & rules		About OI	С				
Need some help?	Email Market Oversight	RCW (laws) & V Proposed rules Recently adopte Report fraud	VAC (rules) ed rules	What we Newsroo About Mi	do m ke Kreidler				

Final Determination Confirmation

After filling in all required fields, the user confirms they are authorized to submit the information and confirms the information is accurate by selecting the *Submit final decision* tab. The OIC portal will display a confirmation stating the information was received and from there the user can navigate to the Home Page to review further cases, request another IRO, or log out.



Data Fields an	d Definitions Tal	ole
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Data Fields	Definition/Available Options
Policy Type	 Large Group Grandfathered Small Group Grandfathered Individual Grandfathered Large Group Non-Grandfathered Small Group Non-Grandfathered Individual Non-Grandfathered
Diagnosis	General ICD-10 code reference
Diagnosis Subcategory	Dropdown list of subcategories (ICD-10 codes) based on the ICD-10 code entered in the Diagnosis field. Values will only display if the Diagnosis entered has subcategories.
Disputed Treatment	The CPT code being disputed. Field only accepts a single CPT code.
Enrollee's Age	Specific age will not be made public.
Gender	 Male Female Transitioning Not Provided
Was Covered Person English Language Proficient?	 Yes If no, was documentation provided in native language?
Independent Review Final Resolution	 Upheld Overturned Withdrawn by Carrier Withdrawn by Enrollee
Date IRO Completed the Review or Closed File	Reference documentation from IRO



Data Field	Definition/Available Options
Date the Carrier is Notified by the IRO of Final Resolution	Reference documentation from IRO
Date the Enrollee was notified of the Final Resolution	The date the enrollee was notified of the outcome. The enrollee has a right to know why the review is taking longer. By the IRO or the carrier.
Date the Carrier Closed the File	The date that the IRO decision has been implemented by the Carrier.

Defining Terms

Adverse Benefit Determination [from RCW 48.43.005(2)]: A denial, reduction, or termination of, or a failure to provide or make payment, in whole or in part, for a benefit, including a denial, reduction, termination, or failure to provide or make payment that is based on a determination of an enrollee's or applicant's eligibility to participate in a plan, and including, with respect to group health plans, a denial, reduction, or termination of, or a failure to provide or make payment, in whole or in part, for a benefit resulting from the application of any utilization review, as well as a failure to cover an item or service for which benefits are otherwise provided because it is determined to be experimental or investigational or not medically necessary or appropriate.

Carrier [from RCW 48.44.010(1)]: A health maintenance organization, an insurer, a health care services contractor, or other entity responsible for the payment of benefits or provision of services under a group or individual agreement.

Enrollee [from RCW 48.43.005(11)]: A person covered by a health plan including a subscriber, policyholder, beneficiary of a group plan, or individual covered by any other health plan.

Final External Review Decision [from RCW 48.43.005(18)]: A determination by an independent review organization at the conclusion of an external review.



OIC Contact Information

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