

# **Provider Newsletter July 2019**

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# **HAP Midwest integration with hap.org**

On July 1, we integrated the HAP Midwest website with **hap.org**. You now have one system for claims, remittance advices, authorizations, member eligibility and more through a secure provider portal. Below are instructions for accessing the portal.

If	Then	
You already have a login and	1. Visit hap.org.	
password for provider portal	2. Log in with your username and password.	
You don't have a login and password	You can:	
for provider portal	• Self-register by visiting <b>hap.org</b> and selecting <i>Register Now</i> .	
	or	
	• Call (866) 766-4708	
Note: Vendor ID and password are required to access remittance advice.		

For more information on the integration, visit the Provider Newsroom. Go to hap.org/providers and select *Provider Resources; Medicaid and MI Health Link providers; Newsletters and key information* and then *HAP Midwest Integration Update*.

# **HAP Empowered**

Earlier this year, the plans we offer through HAP Midwest Health Plan, Inc. became HAP Empowered plans. These plans include:

- HAP Empowered Medicaid
- HAP Empowered Healthy Michigan Plan
- HAP Empowered MI Child Program
- HAP Empowered Children's Special Health Care Services program
- HAP Empowered MI Health Link

Only our plan name changed. Members are still with HAP Midwest Health Plan, Inc. and their coverage didn't change. **Providers are contracted and paid through HAP Midwest Health Plan.** 

#### **Important contacts**

For	Contact
Claims questions	(888) 654-2200 and follow the prompts
<ul><li>Adding providers to your office</li><li>Office or remittance advice address changes</li></ul>	provider_contracting@hap.org or provider_development@hap.org
Provider contracting	(866) 766-4708 or provider_development@hap.org
Provider services	(866) 766-4708 or prelweb1@hap.org
Fee schedules Providers are reimbursed at the Medicaid fee schedule.	Michigan.gov/mdhhs  Details about Medicaid, assistance programs, billing and reimbursement and other provider-specific information.

#### Physician incentive disclosure

HAP Midwest doesn't pay financial incentives to practitioners or providers to withhold any health care or health care related services. HAP Midwest doesn't make decisions about hiring, promoting, or terminating practitioners, providers or other staff based on the likelihood that the individual supports, or tends to support, the denial of benefits or services. HAP Midwest does not reward practitioners, providers or other individuals for issuing denials of coverage. HAP Midwest makes decisions on evidence-based criteria and benefits coverage.

#### Pay for Performance Program for primary care physicians

HAP Midwest has a Pay for Performance Program for PCPs. For more information, log in at **hap.org** and select *P4P for PCPs-Medicaid and MI Health Link* under *Quick Links*.

#### **Vaccines**

State law requires providers who administer vaccines to HAP Empowered Medicaid members to obtain the vaccines through the Vaccines for Children program. This is a federal program that makes vaccines available to immunize children age 18 and under who are Medicaid eligible. Vaccines can be obtained free of charge from local health departments.

#### **Michigan Care Improvement Registry**

Per your contract with HAP Midwest Health Plan and Public Act 91 of 2006, all immunization providers are required to report childhood immunizations to the Michigan Care Improvement Registry. This affects immunizations administered to persons born Jan. 1, 1994 to present.

If you need information on reporting or access, call **(888) 217-3903** or visit **mcir.org.** They can also help you improve your immunization rates by using MCIR to run batch reports and monthly immunization recall letters.

# **Reporting communicable diseases**

The state and the HAP Midwest provider contract require providers to report communicable diseases to the local health department.

#### The Alliance for Immunization in Michigan

The Alliance for Immunizations in Michigan was formed in 1994 to focus on a broad spectrum of immunization issues in Michigan. The initial focus was to reduce missed opportunities to immunize by emphasizing provider education.

The AIM coalition's efforts were combined into what became known as the AIM Provider Tool Kit. The tool kit is a comprehensive resource for immunization management, patient education, and other high-quality information, such as:

- Catch-up schedules
- Storage information
- Vaccine information sheets

The AIM tool kit can be found at aimtoolkit.org.

#### Healthy Michigan Plan health risk assessment completion instructions

HAP Midwest Health Plan offers a \$25 incentive for primary care physicians who complete and return a health risk assessment for their HAP Empowered Healthy Michigan Plan patients. This incentive payment is part of the Pay for Performance Bonus Program. To be eligible, PCPs must:

- Complete and sign the HRA.
- Give the member a copy.
- Fax the completed HRA to (844) 225-4602.
- Bill with CPT code 96160. It will be processed at a \$0.00 fee. The transaction will appear on the remittance advice and submitted to the Michigan Department of Health and Human Services as an encounter.

If you have any questions, please contact (844) 214-0870.

You can also submit HRAs through CHAMPS. For instructions, visit **michigan.gov/mdhhs**. Select Assistance Programs; Health Care Coverage; Healthy Michigan Plan, then Health Risk Assessment.

# Medicaid provider enrollment in CHAMPS requirement for prescribers

Per the Michigan Department of Health and Human Services, all providers serving Medicaid beneficiaries must be enrolled in CHAMPS. This is the state's online Medicaid enrollment and billing system. It ensures all providers who participate in Medicaid comply with federal screening and enrollment requirements.

On October 1, 2019, CHAMPS **prescriber** edits go into effect, including all health care providers who can prescribe medications. The MDHHS has issued the following deadline:

• For dates of service on or after October 1, 2019, MDHHS fee-for-service and Medicaid Health Plans will prohibit payment for prescription drug claims written by a prescriber who is not enrolled. These pharmacy claims will reject at the point-of-service with a hard edit and message to the pharmacy: "Prescriber Not Enrolled in State Medicaid Program."

The MDHHS developed a letter to explain this issue to beneficiaries who are receiving prescriptions from a non-CHAMPS enrolled prescriber. HAP Empowered will mail this letter to impacted beneficiaries on September 1.

For more information on CHAMPS and to enroll, visit michigan.gov/medicaidproviders.

# **Medicaid Prescription Drug Therapy**

The Michigan Department of Health and Human Services is taking steps to streamline Medicaid's drug coverage policies. Currently, about one-half of prescription drugs are carved out from managed Medicaid health plans and covered through fee-for-service Medicaid. In October, the MDHHS will be carving in many drugs that are dispensed at the pharmacy and are currently carved out. This will simplify coverage for providers and beneficiaries. Some drugs are part of certain MDHHS program initiatives and will continue to be carved out.

There will be a transition process to prevent disruption to beneficiaries, and prior authorizations that are currently in effect will remain in effect through the end date of the authorization. The MDHHS will provide further details later this year. We'll share more information when details are finalized by MDHHS.

# **Assistance with opioid prescribing**

Do you have questions or need assistance with opioid management? HAP was involved in developing and endorsing provider education for opioid management for the Genesee County Opioid Prevention Project at <a href="https://knowmoregenesee.org">https://knowmoregenesee.org</a>. This information was developed for Genesee County, but these resources are available and helpful to all providers:

- Information about how to become a medication-assisted treatment (MAT) provider
- Information and training resources
- Information about opioid legislation and MAPS
- Opioid prescribing guidelines and educational resources
- Opioid education and prevention-proper disposal of opioid prescriptions, signs of misuse and overdose
- National, state and local resources for assistance related to opioids

#### **HAP Empowered MI Health Link opioid programs**

#### Point of sale pharmacy edits

1. Care coordination edit

Any opioid claim will reject at the pharmacy if:

- It exceeds a morphine milligram equivalent (MME) dose of 90 mg and
- There is more than one opioid prescriber in the previous six months

This rejection ensures care is being coordinated between providers when there are multiple opioid prescribers. Pharmacies can consult with providers and override this rejection at the point of sale.

- 2. Seven-day supply limit for acute pain
  - Opioid claims will be limited to a seven-day supply when used for acute pain. Acute pain will be determined at the point of sale based on the history of opioid fills. If a member hasn't filled opioids in the previous 108 days, HAP will assume an opioid is being prescribed for acute pain. The pharmacy **cannot** override this edit.
- 3. Multiple long-acting opioid medications
  - If a member is filling two long-acting opioid medications simultaneously, the subsequent drugs will reject. Pharmacies will be able to override this rejection at the point of sale if they confirm that therapy is appropriate.
- 4. Concomitant use of benzodiazepines
  - If a member has overlapping claims for benzodiazepine and opioid medications, the subsequent drug will reject. Pharmacies will be able to override this rejection at the point of sale if they confirm that concomitant use is appropriate.

For more information on opioid rules for 2019, visit cms.gov and select:

- Outreach & Education
- Medicare Learning Network® (MLN) Homepage
- MLN Matters Articles
- Select 2018
- Enter SE 18016 in the Filter On box

#### **HAP Empowered MI Health Link Drug Management Program**

Our Drug Management Program (DMP) helps ensure our members use their prescription opioid medications safely. A member may be enrolled in the DMP if **all** the criteria below is met.

- 1. Prescription exceeds 90 mg MME opioid dose in the previous six months
- 2. Member has four or more prescribers contributing to opioid use in previous six months
- 3. Member has four or more pharmacies dispensing opioids in the previous six months

Once a member is enrolled in the program, we consult with providers to determine if the opioid use is appropriate and medically necessary. If we decide that a member is at risk for mis-using or abusing opioid medications, we may limit access to opioids and/or benzodiazepines by:

- Requiring the member to get all prescriptions for opioid medications from one pharmacy
- Requiring the member to get all prescriptions for opioid medications from one doctor
- Limiting the amount of opioid medication we will cover

We'll communicate with members and providers in advance of putting any limitations in place. Members and providers will have the chance to appeal our decision.

The DMP may not apply if the member has certain medical conditions, such as cancer, or is receiving hospice care or living in a long-term care facility.

# **HAP Empowered Medicaid and HAP Empowered MI Health Link Drug Formularies**

You can find drug formularies, along with updates and changes, on hap.org. Information includes:

- Restrictions and preferences
- Explanation of limits
- How to use the formulary
- How to submit an exception request
- Generic drugs
- Step therapy
- Prior authorization

You can search the formulary to check the status of a specific drug or look at a drug category. You can also view or print the complete formulary document. A printed copy of the drug formulary and related documents are also available upon request.

We post the drug formularies on the website annually and posts updates about formulary changes throughout the year. If there are changes that result in drug restrictions or replacements, we'll notify affected members and their prescriber.

# HAP Empowered Medicaid and HAP Empowered MI Health Link pharmacy prior authorization requests contact information

For	Contact
Faxed requests for prior authorization or exceptions	Fax: (313) 664-5460
Prior authorization line	Phone: (313) 664-8940, option 3

# **Access and Availability Standards**

Per the HAP Midwest Health Plan contract, all providers must follow the access and availability standards outlined below.

Medicaid Government Program		
Topic	Standard	Measurement Tool
Availability of Practitioners: HAP I	Midwest Health Plan will ensure th	e availability of primary and key
specialty practitioners for its men	nbers.	
Number of primary care practitioners  • General and internal medicine  • Family practice  • Pediatricians	Ratio of PCPs to members: 1:500	On an annual basis, HAP Midwest reviews and updates the ratios of PCP's to membership, per the MDHHS Medicaid Contract.
Number of key specialty practitioners (high volume)  OB-GYN  Top two specialties based on high-volume claims data	Ratio of practitioners to members: 1:4,000	On an annual basis, HAP Midwest will compute the ratios of specialists to membership using provider and member data from the claims systems. Membership is defined as the total enrolled population, or relevant population for OB-GYN (female members).
Number of high impact practitioners  • Oncology	1:4,000	On an annual basis HAP Midwest will compute the ratio of high-impact specialists to membership, using provider and member data from claim systems.
Geographic access: Distance to PCPs, specialists and hospital services. Specialists include:  OB-GYN  Top two specialties based on high-volume claims data	PCPs, pediatricians, and specialist services will be 30 minutes/30 miles for non-rural and 40 minutes/40 miles for rural from a member's home.  Hospital services will be 30 minutes/30 miles for non-rural and 60 minutes/60 miles for rural from a member's home.	HAP Midwest will conduct an annual analysis using GeoNetworks software, provider data from the claims systems per the MDHHS Medicaid Contract.
Geographic access: distance to high impact specialists  • Oncology	Non-rural: A high-impact practitioner will be 40 minutes/40 miles from a member's home.  Rural: A high-impact practitioner will 60 minutes/60 miles from a member's home.	HAP Midwest will conduct an annual analysis using GeoNetworks software, provider data from the claims systems per the MDHHS Medicaid Contract.

Medicaid Government Program		
Topic	Standard	Measurement Tool
Outpatient behavioral health*	Outpatient behavioral health* services will be 30 minutes/30 miles for non-rural and 75 minutes/75 miles for rural from a member's home.	HAP Midwest will conduct an annual analysis using GeoNetworks software, provider data from the claims systems per the MDHHS Medicaid Contract.
Accessibility of Services: Service v	vill be provided "in the appropriate	
Appointment lead time: primary care		Performance will be monitored in the annual Access to Care Survey conducted among PCPs and specialty practices, the Consumer Assessment of Healthcare Providers and Systems Survey and the After-Hours Telephone Access Survey per the MDHHS Medicaid Contract.
Preventive (regular) or     Routine Care – care provided     in asymptomatic situations to     prevent the occurrence or     progression of conditions	Within 30 days of request	Performance will be monitored in the annual Access to Care Survey conducted among PCP and specialty practices and CAHPS Survey per the MDHHS Medicaid Contract.
<ul> <li>Non-urgent Symptomatic care – care provided in symptomatic non-urgent conditions</li> </ul>	Within seven days of request	Performance will be monitored in the annual Access to Care Survey conducted among PCPS and specialty practices and CAHPS Survey per the MDHHS Medicaid Contract.
Urgent care – care for serious, but nonemergency injury or illness	Same or next day (within 48 hours)	Performance will be monitored in the annual Access to Care Survey conducted among PCPs and specialty practices and CAHPS Survey per the MDHHS Medicaid Contract.
After hours care	Physicians or their designee shall be available by telephone seven days a week, 24 hours per day.	Performance will be monitored in the annual After-Hours Telephone Access Survey per the MDHHS Medicaid Contract.
Emergency services	Immediately – seven days a week, 24 hours per day.	Performance will be monitored in the annual After-Hours Telephone Access Survey per the MDHHS Medicaid Contract.

Topic  ■ Wait time in the office - How long before the member is seen by the provider after checking in with the receptionist?  Accessibility of services: Service will be provided "in the appropriate time frame."  Measurement Tool  Performance will be monitored in the annual Access to Care Survey conducted among PCPs and specialty practices.  **Provided** In the appropriate time frame.**  Appointment lead time: High-Volume Specialist and High-Impact Specialist*	<b>Medicaid Government Program</b>		
<ul> <li>Wait time in the office - How long before the member is seen by the provider after checking in with the receptionist?</li> <li>Accessibility of services: Service will be provided "in the appropriate time frame."</li> <li>Performance will be monitored in the annual Access to Care Survey conducted among PCPs and specialty practices.</li> <li>Accessibility of services: Service will be provided "in the appropriate time frame."</li> <li>Appointment lead time: High-Volume Specialist and High-Impact Specialist</li> </ul>		Standard	Measurement Tool
seen by the provider after checking in with the receptionist? conducted among PCPs and specialty practices.  Accessibility of services: Service will be provided "in the appropriate time frame."  Appointment lead time: High-Volume Specialist and High-Impact Specialist	<u> </u>	Less than 30 minutes	Performance will be monitored in
checking in with the receptionist?  Accessibility of services: Service will be provided "in the appropriate time frame."  Appointment lead time: High-Volume Specialist and High-Impact Specialist	long before the member is		the annual Access to Care Survey
receptionist?  Accessibility of services: Service will be provided "in the appropriate time frame."  Appointment lead time: High-Volume Specialist and High-Impact Specialist	seen by the provider after		conducted among PCPs and
Accessibility of services: Service will be provided "in the appropriate time frame."  Appointment lead time: High-Volume Specialist and High-Impact Specialist	checking in with the		specialty practices.
Appointment lead time: High-Volume Specialist and High-Impact Specialist	receptionist?		
	Accessibility of services: Service v	vill be provided "in the appropriate	e time frame."
• Acute specialty care (non- Within five days of request Performance will be monitored in	Appointment lead time: High-Vol	ume Specialist and High-Impact S	pecialist
, , , , , , , , , , , , , , , , , , , ,	Acute specialty care (non-	Within five days of request	Performance will be monitored in
urgent with symptoms) the annual Access to Care Survey	urgent with symptoms)		the annual Access to Care Survey
conducted among specialist			
practices or available data reported			1 .
by provider organizations per the			, , , , , , , , , , , , , , , , , , , ,
MDHHS Medicaid Contract.			
• Specialty care (routine Within six weeks of request Performance will be monitored in		Within six weeks of request	
without symptoms) the annual Access to Care Survey	without symptoms)		·
conducted among specialist			
practices or available data reported			1 -
by provider organizations per the			
MDHHS Medicaid Contract.			
• Urgent care – care for serious, Same or next day Performance will be monitored in		•	
but nonemergency injury or (< 48 hours) the annual Access to Care Survey		(< 48 nours)	- I
illness conducted among specialist	illness		
practices or available data reported			1 -
by provider organizations per the MDHHS Medicaid Contract.			
Accessibility of services: Service will be provided "in the appropriate time frame."	Accessibility of services: Service w	 vill be provided "in the appropriate	
Appointment lead time: behavioral health*	•		time name.
• Routine care Within 10 days of request Performance will be monitored in	• •	T	Parformance will be manitored in
the annual Access to Care Survey	• Routine care	Within 10 days of request	
conducted among specialist			·
practices or available data reported			
by provider organizations per the			1
MDHHS Medicaid Contract.			, , , , , , , , , , , , , , , , , , , ,
• Non-life threating emergency Within six hours of request Performance will be monitored in	Non-life threating emergency	Within six hours of request	
the annual Access to Care Survey			
conducted among specialist			· ·
practices or available data reported			
by provider organizations per the			1 -
MDHHS Medicaid Contract.			

<b>Medicaid Government Program</b>		
Topic	Standard	Measurement Tool
• Urgent care – care for serious,	Same or next day	Performance will be monitored in
but nonemergency injury or	(< 48 hours)	the annual Access to Care Survey
illness		conducted among specialist
		practices or available data reported
		by provider organizations per the
		MDHHS Medicaid Contract.
Accessibility of Services: Service v	vill be provided "in the appropriat	te time frame."
Appointment lead time: dental		
Emergency dental services	Immediately seven days a	Performance will be monitored in
	week, 24 hours per day	the annual Access to Care Survey
		conducted among specialist
		practices or available data reported
		by provider organizations per the
		MDHHS Medicaid Contract.
Routine care	Within 21 days of request	Performance will be monitored in
		the annual Access to Care Survey
		conducted among specialist
		practices or available data reported
		by provider organizations per the
		MDHHS Medicaid Contract.
Preventive services	Within six weeks of request	Performance will be monitored in
		the annual Access to Care Survey
		conducted among specialist
		practices or available data reported
		by provider organizations per the
		MDHHS Medicaid Contract.
• <b>Urgent care</b> – care for serious,	Within 48 hours	Performance will be monitored in
but nonemergency injury or		the annual Access to Care Survey
illness		conducted among specialist
		practices or available data reported
		by provider organizations per the
		MDHHS Medicaid Contract.
Initial appointment	Within eight weeks of request	Performance will be monitored in
		the annual Access to Care Survey
		conducted among specialist
		practices or available data reported
		by provider organizations per the
		MDHHS Medicaid Contract.

<sup>\*</sup>Behavioral health is limited to covered services.

All days are business days.

MI Health Link		
Government Program Topic	Standard	Measurement Tool
•	IAP Midwest Health Plan will ensure th	
specialty practitioners for its		e availability of primary and key
Number of primary care practitioners  • General and internal medicine  • Family practice  • Pediatricians	Ratio of PCPs to members  Minimum 33 providers	On an annual basis HAP Midwest will use the ratio of the combination of PCPs to membership, per the MI Health Link Three-Way Contract with guidance from the CMS MMP HSD Criteria Reference Table.  Membership is defined as the total
Number of key specialty practitioners  OB-GYN Top two specialties based on high-volume claims data	Ratio of practitioners to members OB-GYN minimum two providers  Top two specialties minimum number of providers per the Health Service Delivery Network Adequacy Standards Criteria Reference Table	enrolled population.  On an annual basis HAP Midwest will use the ratio of the combination of high-volume specialists to membership, per the MI Health Link Three-Way Contract with guidance from the CMS MMP HSD Criteria Reference Table.  Membership is defined as the total enrolled population, or relevant population for OB-GYN (female members).
Number of high-impact practitioners  • Oncology	Ratio of practitioners to members oncology minimum 4 providers	On an annual basis HAP Midwest will use the ratio of high-impact specialists to membership, per the MI Health Link Three-Way Contract with guidance from the CMS MMP HSD Criteria Reference Table.
Geographic access: Distance to PCPs, Specialists and Hospital Services. Specialists include:  OB-GYN Top two specialties based on high-volume claims data	PCPs and pediatricians will be 10 minutes/5 miles from a member's home.  OB-GYN will be 30 minutes/15 miles from a member's home  Hospital services will be 20 minutes/10 miles from a member's home.	HAP Midwest will conduct an annual analysis using GeoNetworks software and provider data from the claims systems per the MMP Three-Way Contract with guidance from the CMS MMP HSD Criteria Reference Table.

MI Health Link		
<b>Government Program</b>		
Topic	Standard	Measurement Tool
Geographic access: distance to high impact specialists  • Oncology	Oncology will be 20 minutes/10 miles from a member's home	HAP Midwest will conduct an annual analysis using GeoNetworks software and provider data from the claims systems per the MI Health Link Three-Way Contract with guidance from the CMS MMP HSD Criteria Reference Table.
Accessibility of Services: Serv	ice will be provided "in the appropriate	e time frame."
Appointment lead time: prime	ary care	Performance will be monitored in the annual Access to Care Survey conducted among PCP and specialist practices, the CAHPS Survey and After-hours Telephone Access Survey.
Preventive (regular) and routine care – care provided in asymptomatic situations to prevent the occurrence or progression of conditions	Within 30 days of request	Performance will be monitored in the annual Access to Care Survey conducted among PCP and specialist practices and CAHPS Survey.
Non-urgent symptomatic care – care provided in symptomatic non-urgent conditions	Within 24 hours	Performance will be monitored in the annual Access to Care Survey conducted among PCP and specialist practices and CAHPS Survey per the MI Health Link Three-Way Contract.
Urgent care – care for serious, but nonemergency injury or illness	Within 24 hours	Performance will be monitored in the annual Access to Care Survey conducted among PCP and specialist practices and CAHPS Survey per the MI Health Link Three-Way contract.
After-hours care	Physicians or their designee shall be available by telephone seven days a week, 24 hours per day.	Performance will be monitored in the annual After-Hours Telephone Access survey per the MI Health Link Three-Way Contract.
Emergency services	Immediately seven days a week, 24 hours per day.	Performance will be monitored in the annual After-Hours Telephone Access survey per the MI Health Link Three-Way Contract.

MI Health Link		
Government Program  Topic	Standard	Measurement Tool
Wait time in the office-	Less than 30 minutes	Performance will be monitored in
How long before the		the annual Access to Care Survey
member is seen by the		conducted among PCP and
provider after checking in		specialist practices.
with the receptionist?		
Accessibility of Services: Serv	ice will be provided "in the appropria	te time frame."
Appointment lead time: high	volume specialist and high impact s	pecialist
Acute specialty care	Within 24 hours	Performance will be monitored in
(non-urgent with		the annual Access to Care Survey
symptoms)		conducted among specialist
		practices or available data reported
		by provider organizations per the
		MI Health Link Three-Way Contract.
<ul> <li>Specialty care (routine</li> </ul>	Within six weeks of request	Performance will be monitored in
without symptoms)		the annual Access to Care Survey
		conducted among specialist
		practices or available data reported
		by provider organizations.
Urgent care—care for	Within 24 hours	Performance will be monitored in
serious, but		the annual Access to Care Survey
nonemergency injury or		conducted among specialist
illness		practices or available data reported
		by provider organizations per the
		MI Health Link Three-Way
		Contract.

#### **Questions about HAP Midwest Health Plan?**

You can always call us at **(888) 654-2200** for more information. We also have the following information posted online at **hap.org/providers**. Select *Provider Resources* then *Medicaid and MI Health Link* providers. If you prefer a hard copy, call the number listed above and we'll mail it to you.

- Affirmative statement about UM incentives
- Complex case management
- Coordination of Care between Behavioral Health and Primary Care Providers
- Covered and non-covered benefits
- Credentialing information
- Fraud, Waste and Abuse Information
- Evaluation of medical technology
- HAP Midwest's policy for making an appropriate practitioner reviewer available to discuss any utilization management denial decision and how to contact a reviewer
- Member rights and responsibilities
- Pharmacy procedures and formularies
- Privacy and HIPAA information
- Utilization management criteria