	<b>POLICIES AND PROCEDURES</b>
<b>Policy #:</b> 404- 1744	<b>Lead Department:</b> Utilization Management
<b>Title:</b> Utilization Management System Controls	
<b>Original Date:</b> 1/18/2024	<b>Date Published:</b> 10/22/2024
<b>Approved by:</b> UMWG	

**Purpose:**

The purpose of this policy is to describe the system controls used by the Utilization Management (UM) department and the Appeals and Grievances (A&G) Department at the Central California Alliance for Health (the Alliance) to ensure consistency and accuracy in denial and appeal data. This includes definitions, protocols for modifying data, and monitoring for compliance.

**Policy:**

1. The Alliance determines the definitions and systems within its UM and A&G programs in accordance with the National Committee for Quality Assurance (NCQA) Standards and Guidelines for the Accreditation of Health Plan's Utilization Management Section UM 12.
  - a. The Alliance uses an electronic system called Jiva to document denials and appeals. Each entry into the electronic system is automatically accompanied by a date and time stamp for numerous actions.
  - b. The Alliance defines the date of receipt for denials and appeals as the date the request is received by the Alliance from the member or the member's authorized representative, even if the Alliance does not have all the information necessary to make the decision and even if it is not received directly by the UM or A&G department.
  - c. The Alliance sends written notification for both denials and appeals. The Alliance defines the written notification date as the date the letter was generated for mailing. This date is automatically generated when the letter is printed and is not editable under any circumstances,


**Definitions:**

Utilization Management Program: The Utilization Management Program serves to ensure that appropriate, high quality, cost-effective utilization of health care resources is available to all members through the systematic and consistent application of utilization management processes based on current, relevant medical review criteria and expert clinical opinion when needed. For more information on the Utilization Management Program refer to Alliance Policy 404-1101 Utilization Management Program.


Receipt Date: The date/time the authorization or appeal request is received by the Alliance, even if it is not received by the relevant department, consistent with NCQA requirements.

Notification Date: The date when the notice was provided to the member and practitioner, as applicable, consistent with NCQA requirements.

**Procedures:**

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1. The UM program and Jiva systems define the process and protocols for modifying recorded date data and tracking these modifications.
  - d. Written notification for denials and appeals are automatically generated in the Jiva system when the letters are generated. These cannot be modified by any staff under any circumstances.
  - e. Requests and appeals received through the Provider Portal or received through fax have receipt dates generated in real time in the Jiva system. These dates cannot be modified by any staff under any circumstances.
  - f. Requests and appeals received through other means, such as phone, email, or mail have the received date manually entered into the Jiva system when the request is created in the system. This date is not editable after the request is entered into the system.
  - g. The Jiva system locks all editing of this date field after initial entry in order to maintain system integrity. No staff have access to edit receipt or notification dates under any circumstances.
  - h. The Alliance Jiva system doesn't produce date modification reports because date modifications are prohibited through advanced system controls. These controls are further defined through examples in Attachment A: ZeOmega Alliance System Controls Letters.
2. The Alliance controls access to systems in conjunction with the Information Technology (IT) Department and the Facilities and Administration (Facilities) Department.
  - a. Access to Jiva for Appeals and Denials is granted through the IT department to UM and A&G staff when they begin employment with the Alliance. Each staff member is issued a unique Alliance Domain user account and password that requires change on first use and requires change at least every 90 days. Each user account has unique user rights and permission tiers. Staff are also required to utilize multi-factor authentication through Microsoft Entra ID. All Alliance staff (including UM and A&G) are required to use strong passwords (combining upper- and lower-case letters, and numbers), avoid writing down passwords, use a different password for their computer and other secure databases, and change their password at least every 90 days. Passwords are required to be changed if passwords are compromised, or changes may be requested by staff. UM and A&G staff are required to let IT staff know when passwords are compromised. See Policy 105-4039 Access to and Confidentiality of ePHI.
  - b. The physical buildings in which the UM and A&G staff work are secured by badge access. Badge access is provided upon employment and area access is dependent on the area in which staff will work. Access to computer servers, hardware, and physical records is limited by the specific staff member's badge access. The Alliance Facilities

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department provides badge access upon employment and revokes badge access upon termination. See Policy 500-2001 Acceptable Use.

- c. Alliance staff who access systems remotely are provided with secure remote access technologies (e.g. Virtual Private Network (VPN)). Remote staff are required to immediately report loss or theft of devices used to access Alliance resources, ensure devices are not used by any unauthorized person, and are instructed not to print any documents containing PHI at the home worksite (including denials and appeals). See Policy 500-2001 Acceptable Use.
- d. Other methods of preventing unauthorized access and changes may include: limiting login attempts, IP address authentication, use of firewalls, or use of antivirus software and spyware protection programs.
- e. When UM and A&G staff no longer require access to the Jiva system or have left the Alliance, the supervisor or manager advises IT that the responsibilities of the staff member have changed, and IT removes account access for the employee to prevent unauthorized access to the system.

#### References:

Alliance Policies:

Impacted Departments:

Regulatory:

Legislative:

Contractual (Previous Contract):

Contractual (2024 Contract):

DHCS All Plan Letter:

NCQA (Effective 02/29/2024):

NCQA UM12: A-D

Supersedes:

Other References:

Attachments:

Attachment A: ZeOmega Alliance System Controls Letters

#### Lines of Business This Policy Applies To


- ☐ DSNP
- ☒ Medi-Cal
- ☒ Alliance Care IHSS

#### LOB Effective Dates

(01/01/2026 – present)

(01/01/1996 – present)

(07/01/2005 – present)

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**Revision History:**

Reviewed Date	Revised Date	Changes Made By	Approved By
7/26/2024	7/26/2024	Sabryna Sherman, UM Manager - Authorizations and Transportation Coordination	UMWG
08/27/2024	08/27/2024	Sabryna Sherman, UM Manager - Authorizations and Transportation Coordination	UMWG