

Bureau of Managed Care
Managed Care Organizations
Policy / Procedures

General Contract Monitoring

HFS Provider Resolution Portal Requirements

Providers have the capability to submit complaints regarding unresolved issues with MCOs via the HFS Managed Care Provider Resolution Portal (Portal) implemented on February 28, 2020. MCOs are responsible for the timely and complete resolution of provider complaint tickets that are logged into the HFS Provider Resolution Portal.

Requirements

- The provider dispute resolution process requires providers to first work with the MCO via the MCOs internal dispute process to attempt to resolve disputes before submitting a complaint in the Portal. MCOs **MUST** actively work and communicate with providers in an effort to address and respond to issues/complaints pursuant to their internal dispute processes and work to minimize the number of complaints needing to be entered into the Portal.
- MCOs **MUST** assign MCO specific complaint tracking numbers to issues submitted by providers under the MCO internal dispute process. The complaint is considered received by the MCO once the MCO has issued a complaint tracking number for the complaint. The MCO provided complaint tracking number is required when submitting a disputed complaint in the Portal. The MCO provided complaint tracking numbers must be included on all correspondence regarding Portal issues.
- If a provider does not agree with the proposed resolution by the MCO using the internal dispute resolution process, or the provider has not received a timely response from the MCO, the provider can submit a complaint to the Portal 30 calendar days from the date the MCO received the complaint. Complaints submitted to the Portal earlier than 30 calendar days from the date received will be closed. Complaints submitted after 60 calendar days from the date received by the MCO will also be closed as not timely.
- The HFS Portal Team shall present complaints to the appropriate MCO within 10 business days of receipt via the Portal. MCOs are expected to access the portal system on a daily basis in order to identify, review and respond timely to new and pending tickets. The MCO shall have primary staff dedicated to accessing the Portal on a daily basis and shall notify HFS and the Portal Team in writing (email) of changes in personnel as they occur. MCO staff shall also work directly with the Portal Team, on requests shared by the Portal team, pertaining to provider complaints, questions and policy clarifications.
- MCOs **MUST** communicate directly with providers and should not rely on the HFS Portal Team to contact providers or to relay questions and/or responses. MCOs must work with the provider contact listed in the complaint. Ultimately, this is the person who has authority to say the complaint has been resolved from the provider perspective.

- **MCO Written Response/Proposal:** The MCO has 30 calendar days to review the complaint and issue a written response/proposal to resolve the disputed complaint ticket. If the 30 calendar day resolution date falls on a weekend (Saturday or Sunday) or State Holiday as defined under Contract, the Portal system will adjust the proposal due date to the next business day. HFS may apply sanctions to the MCO if a proposal/response is not submitted within 30 calendar days and the ticket goes overdue.
 - ◊ If the MCO requires additional information from the provider, the MCO must request the additional information from the provider within five (5) business days of receiving the complaint ticket in the Portal.
 - When additional information is requested by the MCO, the provider has five (5) business days to provide the additional information or demonstrate that it was already provided to the MCO.
 - During the resolution process, if there are extenuating circumstances, the MCO may request, through the Portal, that HFS authorize a single 30 calendar day extension. An extension request must be made by the MCO no later than seven (7) calendar days prior to the end of the initial 30 calendar day period. Approval of the extension is at the discretion of HFS. Only one (1) extension is possible in extenuating circumstances to either the provider or the MCO, but not both (as approved by HFS). An approved extension adds 30 calendar days to the initial 30 calendar day period, for a total of 60 calendar days within which the MCO must develop a written proposal to resolve the complaint ticket.
- When the MCO has reached a resolution, they must enter the written response/proposal directly into the Portal. The MCO response shall include the detailed plan for resolution and a time period in which the complaint will be resolved, as applicable. The MCO shall also include in the detailed response the name of a direct contact at the MCO, including a good phone number and email address for providers to contact in the event the provider has questions about the written response/proposal. The provider has an opportunity to express disagreement with the response/proposal before closure. It is essential that HFS knows when a ticket is resolved, so that it can be closed and avoid triggering MCO sanctions for untimely resolutions.
 - When the MCO is entering the written response/proposal into the ticket, the MCOs must also select the “**Upheld**” or the “**Overtured**” checkbox to complete the ticket response process. The MCO must indicate by the checkbox it selects whether they upheld their original internal dispute decision issued to the provider, or if the MCO overturned the original internal dispute decision issued to the provider.
 - For tickets that are for Patient Credit File (PCF) issues, the MCO should be ensuring that the issue is fully vetted by the MCO during the internal dispute process and also accepting HFS system screen prints – not wait for the ticket to be entered into the Portal to resolve.
- If the provider does not contest the response/resolution within five (5) business days of receipt, the Portal Team closes the ticket.
- If the MCO's proposed response/proposal is contested, the provider has 30 calendar days to request HFS to review the dispute and make a final determination.

- Within 30 calendar days of a provider’s request for HFS review, both the MCO and the provider shall deliver all relevant information to HFS, including contact information for knowledgeable personnel.
- The Portal Team will work with the HFS MCO Account Manager to review the provider request for an HFS Decision. The MCO shall provide additional information requested by HFS within a timely manner. The HFS MCO Account Manager will either provide the HFS Decision or recommend that the Portal Team refer the complaint onto an HFS Subject Matter Expert (SME) for review and HFS Decision.
 - During the HFS MCO Account Manager and HFS SME review, the ticket will be placed in “Administrative Review” status by the Portal Team.
 - The HFS MCO Account Manager or HFS SME will forward the final HFS Decision response to the Portal Team to share with the provider and MCO.
 - HFS Decision: The HFS decision on all disputes shall be final.
- MCOs are **required** to provide a written resolution/response for each ticket within the defined Portal timeframes (30 days or 60 days under an extension). If the MCO makes insufficient progress or misses due dates, the HFS Account Manager and Administration is alerted by the Portal Team and sanctions may be issued.
 - For each Portal ticket that the MCO has not provided a written proposal/response within the resolution time frame provided in the Portal, a \$5,000.00 fine may be issued to the MCO.
 - Should a fine occur, the MCO receives an email notification from the Portal System confirming that a fine has been issued. The fine notification will read as follows:
 - **Email subject line:** MCO Provider Resolution Portal Fine Notice – [ticket tracking number]
 - **Email message:** A written proposal for Provider Resolution ticket [insert ticket reference number] was due [insert date]. Your written proposal was not received on or before this date. Your plan has been fined \$5,000.00 for the untimely handling of the Provider Resolution Ticket.
 - HFS tracks fines issued to each MCO based on a quarterly reporting period.

| Portal Fine Reporting Period | HFS to Issue MCO Portal Sanction Payment Notice |
|-------------------------------------|--|
| January, February and March | No later than April 30 |
| April, May and June | No later than July 31 |
| July, August and September | No later than October 31 |
| October, November and December | No later than January 31 |

- MCOs that receive fines during a reporting period, will receive a Portal Sanction Payment Notice on a quarterly reporting period as follows:
 - HFS will issue each MCO that has received any portal fine notices during a reporting period a Portal Sanction Payment Notice. HFS will issue Portal Sanction Payment Notices to each MCO no later than the end of

the month following the close of the reporting period. The Portal Sanction Payment Notice will identify the portal fines issued to the MCO during the reporting period, the total sanction payment due to HFS, the due date for submission of the sanction payment to HFS, and sanction payment details include the address and HFS Bureau that the sanction should be sent to for processing. If an MCO does not receive any fines during a reporting period, a Portal Sanction Notice will not be issued to the MCO.

- HFS will post a copy of each Portal Sanction Payment Notice on the HFS Care Coordinate website, under the Sanctions Link at:
<https://www.illinois.gov/hfs/MedicalProviders/cc/Pages/Sanctions.aspx>
 - HFS will also share copies of each Portal Sanction Payment Notice with Federal CMS as they occur.
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- All ticket due dates (or extension dates, whichever is greater) are systematically tracked.
 - HFS will report MCO Resolution Portal statistics on its HFS Care Coordination website once reporting capabilities have been finalized within the Portal. The number of complaints, by MCO and program, counts for open, closed and overdue, and number of sanctions may be included in posted reports.

Policy History
General Contract Monitoring
Provider Complaint Portal Requirements

| Date | Action | Policy Originator |
|---------------|--|---------------------------------------|
| April 2018 | Contract Clarification | Laura Ray |
| April 2020 | Update Policy – new portal/rules | Amy Harris Roberts |
| May 2020 | Add Portal Fines/Sanctions | Amy Harris Roberts |
| November 2020 | Clarify 30-Business Days Resolution Dates that fall on weekends or State Holidays | Amy Harris Roberts |
| December 2020 | Clarifications | Amy Harris Roberts and Portal Team |

| Policy Revisions | Revision Approved |
|-------------------------|--------------------------|
| April 2020 | Laura Ray |
| June 2020 | Laura Ray |
| December 2020 | Laura Ray |
| February 2023 | Laura Ray |