

PrimeWest Health

QUALITY ASSURANCE EXAMINATION - 2023

PrimeWest Health Report

For the Period: June 1, 2020 - May 31, 2023

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Issue Date: May 17, 2024

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MINNESOTA DEPARTMENT OF HEALTH EXECUTIVE SUMMARY

The Minnesota Department of Health (MDH) conducted a Quality Assurance Examination of PrimeWest Health to determine whether it is operating in accordance with Minnesota Law. Our mission is to protect, maintain and improve the health of all Minnesotans. MDH has found that PrimeWest Health is compliant with Minnesota and Federal law, except in the areas outlined in the "Deficiencies" and "Mandatory Improvements" sections of this report. "Deficiencies" are violations of law. "Mandatory Improvements" are required corrections that must be made to non-compliant policies, documents, or procedures where evidence of actual compliance is found or where the file sample did not include any instances of the specific issue of concern. The "Recommendations" listed are areas where, although compliant with law, MDH identified improvement opportunities.

To address recommendations, PrimeWest Health should:

None Identified

To address mandatory improvements, PrimeWest Health and its delegates must:

None Identified

To address deficiencies, PrimeWest Health and its delegates must:

None Identified

This report including these deficiencies, mandatory improvements and recommendations is approved and adopted by the Minnesota Commissioner of Health pursuant to authority in Minnesota Statutes, chapter 62D.

Diane Rydyd

5/24/2024

Diane Rydrych, Director Health Policy Division

Date

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I. Introduction

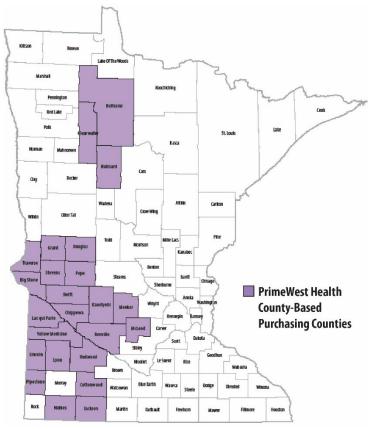
1. History:

PrimeWest Health is a partnership of 24 rural Minnesota counties that have elected to jointly purchase or provide health care services for Minnesota Health Care Programs (MHCP) enrollees who reside in their counties. This arrangement, called County-Based Purchasing (CBP), is authorized by MN Stat. sec. 256B.692. The counties are united to offer innovative health coverage solutions to those eligible for MHCP.

PrimeWest Health was legally established in December 1998 as a county government "Joint Powers" entity under MN Stat. sec. 471.59 by Big Stone, Douglas, Grant, McLeod, Meeker,

Pipestone, Pope, Renville, Stevens, and Traverse counties. The Minnesota Department of Health (MDH) approved PrimeWest Health's CBP application in October 2002 in accordance with MN Stat. sec. 256B.692. In April 2003, the Minnesota Department of Human Services (DHS) awarded PrimeWest Health the contract for administering the Prepaid Medical Assistance Program (PMAP) in its 10 Joint Powers counties beginning July 2003.

Since 2003, PrimeWest Health's history has been one of continual development and expansion. In 2003, PrimeWest Health started with one MHCP product serving approximately 5,500 members in 10 counties through a network of fewer than 1,000 contracted providers. Today, PrimeWest Health administers six MHCP



programs serving nearly 64,000 members in 24 counties¹ through a network of over 15,000 contracted providers. During this same period, PrimeWest Health continually developed

¹ Current counties include Beltrami, Big Stone, Chippewa, Clearwater, Cottonwood, Douglas, Grant, Hubbard, Jackson, Kandiyohi, Lac qui Parle, Lincoln, Lyon, McLeod, Meeker, Nobles, Pipestone, Pope, Redwood, Renville, Stevens, Swift, Traverse and Yellow Medicine.

their abilities to optimally serve their MHCP members through internal operations capacity development, new service and program innovation, and health care reform. The following timeline chronicles key milestones in the history of PrimeWest Health.

2. Membership: 53,326 self-reported Minnesota enrollment as of May 31, 2023 consisted of the following:

Self-Reported Enrollment

Product	Enrollment
Minnesota Health Care Programs – Managed Care (MHCP-MC)	
Families & Children	44,514
MinnesotaCare	2,890
Minnesota Senior Care (MSC+)	1,357
Minnesota Senior Health Options (MSHO)	1,941
Special Needs Basic Care (SNBC)	
SNBC MA Only	948
SNBC Medicare elsewhere	1,460
SNBC Prime Health Complete (PHC)	216
Total	53,326

3. Virtual Examination Dates: August 7, 2023 – August 11, 2023

4. Examination Period: June 1, 2020 to May 31, 2023 File Review Period: January 1, 2022 to May 31, 2023

Opening Date: May 19, 2023

5. National Committee for Quality Assurance (NCQA): HealthPlan is accredited by NCQA



PrimeWest Health (PWH) for its Minnesota Health Care Programs – Managed Care (MHCP-MC) products based on 2021 standards. The Minnesota Department of Health (MDH) evaluated and used results of the NCQA review in one of three ways:

- a. If NCQA standards do not exist or are not as stringent as Minnesota law, the accreditation results were not used in the MDH examination process [No NCQA checkbox].
- b. If the NCQA standard was the same or more stringent than Minnesota law and the health plan was accredited with 100% of the possible points, the NCQA results were accepted as meeting Minnesota requirements [NCQA ☒], unless evidence existed indicating further investigation was warranted [NCQA ☐].

- c. If the NCQA standard was the same or more stringent than Minnesota law, but the plan was accredited with less than 100% of the possible points or MDH identified an opportunity for improvement, MDH conducted its own examination.
- Sampling Methodology: Due to the small sample sizes and the methodology used for sample selection for the quality assurance examination, the results cannot be extrapolated as an overall deficiency rate for the health plan.
- 7. Performance Standard: For each instance of non-compliance with applicable law or rule identified during the quality assurance examination, that covers a three-year audit period, the health plan is cited with a deficiency. A deficiency will not be based solely on one outlier file if MDH has sufficient evidence that a plan's overall operation is compliant with an applicable law. Sufficient evidence may be obtained through: 1) file review; 2) policies and procedures; and 3) interviews.

II. Quality Program Administration

Program

Minnesota Rules, Part 4685.1110

Subparts	Subject	Met	Not Met	NCQA
Subp. 1.	Written Quality Assurance Plan	⊠Met	□ Not Met	
Subp. 2.	Documentation of Responsibility	⊠Met	□ Not Met	□ NCQA
Subp. 3.	Appointed Entity	⊠Met	□ Not Met	□ NCQA
Subp. 4.	Physician Participation	⊠Met	□ Not Met	□ NCQA
Subp. 5.	Staff Resources	⊠Met	□ Not Met	□ NCQA
Subp. 6.	Delegated Activities	⊠Met	☐ Not Met	□ NCQA
Subp. 7.	Information System	⊠Met	□ Not Met	□ NCQA
Subp. 8.	Program Evaluation	□Met	☐ Not Met	⊠ NCQA
Subp. 9.	Complaints	⊠Met	□ Not Met	
Subp. 10.	Utilization Review	⊠Met	☐ Not Met	
Subp. 11.	Provider Selection and Credentialing Also refer to 62Q.097	□Met	□ Not Met	⊠ NCQA
Subp. 12.	Qualifications	□Met	□ Not Met	⊠ NCQA
Subp. 13.	Medical Records	⊠Met	□ Not Met	

Delegated Activities

<u>Subp. 6.</u> Minnesota Rules, part 4685.1110, subpart 6, states the HMO must develop and implement review and reporting requirements to assure that the delegated entity performs all delegated activities. The standards and processes established by the National Committee for Quality Assurance (NCQA) for delegation are considered the community standard and, as such, were used for the purposes of this examination. The following delegated entities and functions were reviewed.

Delegated Entities and Functions

Entity	UM	QOC	Complaints/ Grievances	Appeals	Cred	Claims	Disease Mgmt	Network Mgmt	Care Coord
MedImpact	Χ				X	Х		Χ	
Clearwater County									Х
Meeker County									Х

Activities

Minnesota Rules, Part 4685.1115

Subparts	Subject	Met	Not Met
Subp. 1.	Ongoing Quality Evaluation	⊠Met	☐ Not Met
Subp. 2.	Scope	⊠Met	☐ Not Met

Quality Evaluation Steps

Minnesota Rules, Part 4685.1120

Subparts	Subject	Met	Not Met
Subp. 1.	Problem Identification	⊠Met	☐ Not Met
Subp. 2.	Problem Selection	⊠Met	☐ Not Met
Subp. 3.	Corrective Action	⊠Met	☐ Not Met
Subp. 4.	Evaluation of Corrective Action	⊠Met	☐ Not Met

Focused Study Steps

Minnesota Rules, Part 4685.1125

Subparts	Subject	Met	Not Met
Subp. 1.	Focused Studies	⊠Met	☐ Not Met
Subp. 2.	Topic Identification and Selections	⊠Met	☐ Not Met
Subp. 3.	Study	⊠Met	☐ Not Met
Subp. 4.	Corrective Action	⊠Met	☐ Not Met
Subp. 5.	Other Studies	⊠Met	☐ Not Met

Filed Written Plan and Work Plan

Minnesota Rules, Part 4685.1130

Subparts	Subject	Met	Not Met
Subp. 1.	Written Plan	⊠Met	☐ Not Met
Subp. 2.	Work Plan	⊠Met	☐ Not Met
Subp. 3.	Amendments to Plan	⊠Met	☐ Not Met

Provider Selection and Credentialing

<u>Subp. 11</u>. Minnesota Rules, part 4685.1110, subpart 11, states the plan must have policies and procedures for provider selection, credentialing and recredentialing that, at a minimum, are consistent with community standards. MDH recognizes the community standard to be NCQA. PrimeWest Health scored 100% on all 2023 NCQA Credentialing/recredentialing standards.

MDH reviewed a total of 24 credentialing files as indicated in the table below.

Credentialing File Review

	File Source	# Reviewed
Initial		
PrimeW	est Health Physicians	4
PrimeW	est Health Allied	4
HealthF	Partners Physicians	5
HealthF	Partners Allied	3
Essentic	a Health Physicians	4
Essentic	a Health Allied	4

File Source	# Reviewed
Total	24

Requirements For Timely Provider Credentialing

Minnesota Statutes, Section 62Q.097

Subdivisions	Subject	Met	Not Met
Subd. 1.	Definitions	⊠Met	☐ Not Met
Subd. 2.	Time limit for credentialing determination		
	(1) If application is clean and if clinic/facility requests, notify of date by which determination on app.	⊠Met	□ Not Met
	(2) If app determined not to be clean, inform provider of deficiencies/missing information within three business days	⊠Met	□ Not Met
	(3) Make determination on clean app within 45 days after receiving clean app	⊠Met	□ Not Met
	(4) Health plan allowed 30 additional days to investigate any quality or safety concerns.	⊠Met	□ Not Met

Enrollee Advisory Body

Minnesota Statutes, Section 62D.06, Subdivision 2

Section	Subject	Met	Not Met
Subd. 2	Enrollee Input. Governing body shall establish a mechanism to afford the enrollees an opportunity to express their opinions in matters of policy and operation.	⊠Met	□ Not Met

III. Quality of Care

MDH reviewed a total of 8 quality of care grievance and complaint system files.

Quality of Care File Review

File Source	# Reviewed
Quality of Care	
MHCP Grievances	8
Total	8

Quality of Care Complaints

Minnesota Statutes, Section 62D.115

Subparts	Subject	Met	Not Met
Subd. 1.	Definition	⊠Met	☐ Not Met
Subd. 2.	Quality of Care Investigations	⊠Met	☐ Not Met

IV. Grievance Systems

Grievance System

MDH examined PrimeWest Health's Minnesota Health Care Programs Managed Care Programs – Managed Care (MHCP-MC) grievance system for compliance with the federal law (42 CFR 438, subpart F) and the DHS 2022 Contract, Article 8.

MDH reviewed a total of 24 grievance system files.

Grievance System File Review

File Source	# Reviewed
Grievances	
PrimeWest Health Written	
PrimeWest Health Oral	8
DTRs	
MedImpact PBM (Pharmacy Benefit Manager)	8
Clinical and Non-Clinical Appeals	
PrimeWest Health Written	1
PrimeWest Health Oral	3
State Fair Hearing	4
Total	24

General Requirements

DHS Contract, Section 8.1

Section	42 CFR	Subject	Met	Not Met
Section 8.1.	§438.402	General Requirements		
Sec. 8.1.1.		Components of Grievance System	⊠Met	☐ Not Met

Internal Grievance Process Requirements

DHS Contract, Section 8.2

Section	42 CFR	Subject	Met	Not Met
Section 8.2.	§438.408	Internal Grievance Process Requirements		

Section	42 CFR	Subject	Met	Not Met
Section 8.2.1.	§438.402 (c)	Filing Requirements	⊠Met	☐ Not Met
Section 8.2.2.	§438.408 (b)(1), (d)(1)	Timeframe for Resolution of Grievances	⊠Met	□ Not Met
Section 8.2.3.	§438.408 (c)	Timeframe for Extension of Resolution of Grievances	⊠Met	☐ Not Met
Section 8.2.4.	§438.406	Handling of Grievances		
8.2.4.1	§438.406 (b)(1)	Written Acknowledgement	⊠Met	☐ Not Met
8.2.4.2	§438.416	Log of Grievances	⊠Met	☐ Not Met
8.2.4.3	§438.402 (c)(3)	Oral or Written Grievances	⊠Met	☐ Not Met
8.2.4.4	§438.406 (a)	Reasonable Assistance	⊠Met	☐ Not Met
8.2.4.5	§438.406 (b)(2)(i)	Individual Making Decision	⊠Met	☐ Not Met
8.2.4.6	§438.406 (b)(2)(ii)	Appropriate Clinical Expertise	⊠Met	☐ Not Met
Section 8.2.5.	§438.408 (d)(1)	Notice of Disposition of a Grievance		
8.2.5.1	§438.404 (b) §438.406 (a)	Oral Grievances	⊠Met	□ Not Met
8.2.5.2	§438.404 (a), (b)	Written Grievances	⊠Met	☐ Not Met

DTR Notice of Action to Enrollees

DHS Contract, Section 8.3

Section	42 CFR	Subject	Met	Not Met
Section 8.3.	§438.10 §438.404	DTR Notice of Action to Enrollees		
Section 8.3.1.	§438.10(c), (d) §438.402(c) §438.404(b)	General Requirements	⊠Met	□ Not Met
Section 8.3.2	§438.402 (c), §438.404 (b)	Content of DTR Notice of Action	⊠Met	☐ Not Met
8.3.2.1	§438.404	Notice to Provider	⊠Met	☐ Not Met
Section 8.3.3.	§438.404 (c)	Timing of DTR Notice MCO must make a good faith effort to promptly notify the STATE and the Ombudsman for Managed Care if the MCO becomes aware that DTRs are not being issued timely.	⊠Met	□ Not Met
8.3.3.1	§431.211	Previously Authorized Services	⊠Met	☐ Not Met
8.3.3.2	§438.404 (c)(2)	Denials of Payment	⊠Met	☐ Not Met
8.3.3.3	§438.210 (c)(d)	Standard Authorizations		

Section	42 CFR	Subject	Met	Not Met
(1)		As expeditiously as the enrollee's health condition requires	⊠Met	□ Not Met
(2)		To the attending health care professional and hospital by telephone or fax within one working day after making the determination	⊠Met	□ Not Met
(3)		To the provider, enrollee and hospital, in writing, and must include the process to initiate an appeal, within ten (10) business days following receipt of the request for the service, unless the MCO receives an extension of the resolution period	⊠Met	□ Not Met
8.3.3.4	§438.210 (d)(2)(i)	Expedited Authorizations	⊠Met	☐ Not Met
8.3.3.5	§438.210 (d)(1)	Extensions of Time	⊠Met	☐ Not Met
8.3.3.6	§438.210(d)(3) and 42 USC 1396r-8(d)(5)	Covered Outpatient Drug Decisions	⊠Met	□ Not Met
8.3.3.7	§438.210 (d)(1)	Delay in Authorizations	⊠Met	☐ Not Met

Internal Appeals Process Requirements

DHS Contract, Section 8.4

Section	42 CFR	Subject	Met	Not Met
Section 8.4.	§438.404	Internal Appeals Process Requirements		
Sec. 8.4.1.	§438.402 (b)	One Level Appeal	⊠Met	☐ Not Met
Sec. 8.4.2.	§438.408 (b)	Filing Requirements	⊠Met	☐ Not Met
Sec. 8.4.3.	§438.408	Timeframe for Resolution of Appeals		
8.4.3.1	§438.408 (b)(2)	Standard Appeals	⊠Met	☐ Not Met
8.4.3.2	§438.408 (b)(3)	Expedited Appeals	⊠Met	☐ Not Met
8.4.3.3	§438.408 (c)(3)	Deemed Exhaustion	⊠Met	☐ Not Met
Sec. 8.4.4.	§438.408 (c)	Timeframe for Extension of Resolution of Appeals	⊠Met	☐ Not Met
Sec. 8.4.5.	§438.406	Handling of Appeals		
8.4.5.1	§438.406 (b)(3)	Oral Inquiries	⊠Met	☐ Not Met
8.4.5.2	§438.406 (b)(1)	Written Acknowledgment	⊠Met	☐ Not Met
8.4.5.3	§438.406 (a)	Reasonable Assistance	⊠Met	☐ Not Met
8.4.5.4	§438.406 (b)(2)	Individual Making Decision	⊠Met	☐ Not Met
8.4.5.5	§438.406 (b)(2)	Appropriate Clinical Expertise (See Minnesota Statutes, sections 62M.06, and subd. 3(f) and 62M.09	⊠Met	☐ Not Met
8.4.5.6	§438.406 (b)(4)	Opportunity to Present Evidence	⊠Met	☐ Not Met
8.4.5.7	§438.406 (b)(5)	Opportunity to Examine the Care File	⊠Met	☐ Not Met

Section	42 CFR	Subject	Met	Not Met
8.4.5.8	§438.406 (b)(6)	Parties to the Appeal	⊠Met	☐ Not Met
8.4.5.9	§438.410 (b)	Prohibition of Punitive Action Subsequent Appeals	⊠Met	☐ Not Met
Sec. 8.4.6.		Subsequent Appeals If an Enrollee Appeals a decision from a previous Appeal on the same issue, and the MCO decides to hear it, for purposes of the timeframes for resolution, this will be considered a new Appeal.	⊠Met	□ Not Met
Sec. 8.4.7.	§438.408 (d)(2)	Notice of Resolution of Appeals		
8.4.7.1	§438.408 (d)(2)	Written Notice Content	⊠Met	☐ Not Met
8.4.7.2	§438.210 (c)	Appeals of UM Decisions	⊠Met	☐ Not Met
8.4.7.3	§438.410 (c) and .408 (d)(2)(ii)	Telephone Notification of Expedited Appeals (Also see Minnesota Statutes section 62M.06, subd.2)	⊠Met	☐ Not Met
Sec. 8.4.8.	§438.424	Reversed Appeal Resolutions	⊠Met	☐ Not Met
Sec. 8.5.	§438.420 (b)	Continuation of Benefits Pending Appeal or State Appeal	⊠Met	☐ Not Met

State Appeals

DHS Contract, Section 8.8

Section	42 CFR	Subject	Met	Not Met
Section 8.8.	§438.416 (c)	State Fair Hearings		
Sec. 8.8.2.	§438.408 (f)	Standard Hearing Decisions	⊠Met	☐ Not Met
Sec. 8.8.3.	§431.250	Costs of State Fair Hearing	⊠Met	☐ Not Met
Sec. 8.8.4.	§438.410(a); 431.224	Expedited Hearing Decisions	⊠Met	☐ Not Met
Sec. 8.8.5.	§438.424	Compliance with State Appeal Resolution	⊠Met	☐ Not Met
Sec. 8.8.7.	§438.408(f)	External Review or Medical Review Participation	⊠Met	☐ Not Met
Sec. 8.8.8.	§431.245	Judicial Review	⊠Met	☐ Not Met

V. Access and Availability

Geographic Accessibility

Minnesota Statutes, Section 62D.124

PRIMEWEST HEALTH QUALITY ASSURANCE EXAMINATION

Subdivision	Subject	Met	Not Met
Subd. 1.	Primary Care, Mental Health Services, General Hospital Services	⊠Met	☐ Not Met
Subd. 2.	Other Health Services	⊠Met	☐ Not Met
Subd. 3.	Waiver		☐ Not Met
Subd. 6	Provider Network Notifications	⊠Met	☐ Not Met

Essential Community Providers

Minnesota Statutes, Section 62Q.19

Subdivision	Subject	Met	Not Met
Subd. 3.	Contract with Essential Community Providers	⊠Met	□ Not Met

Availability and Accessibility

Minnesota Rules, Part 4685.1010

Subparts	Subject	Met	Not Met
Subp. 2.	Basic Services	⊠Met	☐ Not Met
Subp. 5.	Coordination of Care	⊠Met	☐ Not Met
Subp. 6.	Timely Access to Health Care Services	⊠Met	☐ Not Met

Emergency Services

Minnesota Statutes, Section 62Q.55

Subdivision	Subject	Met	Not Met
Subd. 1.	Access to Emergency Services	⊠Met	☐ Not Met
Subd. 2.	Emergency Medical Condition	⊠Met	☐ Not Met

Licensure of Medical Directors

Minnesota Statutes, Section 62Q.121

Section	Subject	Met	Not Met
62Q.121.	Licensure of Medical Directors	⊠Met	☐ Not Met

Coverage of Nonformulary Drugs for Mental Illness and Emotional Disturbance

Minnesota Statutes, Section 62Q.527.

Subdivision	Subject	Met	Not Met
Subd. 2.	Required Coverage for Anti-psychotic Drugs	⊠Met	☐ Not Met
Subd. 3.	Continuing Care	⊠Met	☐ Not Met
Subd. 4.	Exception to Formulary	⊠Met	☐ Not Met

Coverage for Court-Ordered Mental Health Services

Minnesota Statutes, Section 62Q.535

Subdivision	Subject	Met	Not Met
Subd. 2.	Coverage required	⊠Met	☐ Not Met

Continuity of Care

Minnesota Statutes, Section 62Q.56

Subdivision	Subject	Met	Not Met	N/A
Subd. 1.	Change in health care provider, general notification	⊠Met	☐ Not Met	
Subd. 1a.	Change in health care provider, termination not for cause	⊠Met	□ Not Met	
Subd. 1b.	Change in health care provider, termination for cause	⊠Met	☐ Not Met	
Subd. 2.	Change in health plans (applies to group, continuation and conversion coverage)	⊠Met	□ Not Met	

VI. Summary of Findings

Recommendations

None Identified

Mandatory Improvements

None Identified

Deficiencies

None Identified