

Written Testimony in Support of
Raised SB 372: AAC Clinical Review Criteria for Utilization Review and Adverse Determination Notices
Before the Insurance and Real Estate Committee
March 15, 2016

Submitted by Christina Hage-Steiner
General Counsel
HealthyCT, Inc.

HealthyCT, Inc., Connecticut's non-profit health insurance CO-OP, supports Connecticut Statute 38a-591c as amended by SB 372.

HealthyCT is a health plan sponsored by doctors and governed by our members. We seek to provide quality healthcare to all Connecticut residents.

We applaud the Behavioral Health Working Group on its work and recommendations for utilization review and quality measures to protect behavioral health coverage for Connecticut consumers. The group's effort to assure the use of evidence-based clinical criteria that remove barriers to behavioral health treatment is commendable.

Over the past three years, HealthyCT has partnered with McKesson Health Solutions to utilize InterQual Criteria, an evidence-based clinical decision support criteria and related software that helps payers and providers deliver high-quality, appropriate care. InterQual has been a qualified vendor of the Connecticut Insurance Department since the qualifying process began in 2013.

HealthyCT currently performs behavioral health utilization management in-house, using the InterQual tool. In the event that C.G.S. 38a-591c is not amended in accordance with the proposal set forth, HealthyCT may no longer be able to utilize the InterQual criteria in Connecticut, and instead, have no other choice but to outsource its behavioral health utilization management function. This will lead to higher costs and lower quality for our members.

Furthermore, in our support of our partners, we also would like to point out that McKesson allows for responsible sharing of its proprietary criteria through transparency tools for its utilization review criteria for patients and providers. Licensing of the InterQual intellectual property has allowed HealthyCT to disclose relevant criteria associated with any medical necessity determination as well as the ability to be made available in online patient and/ or provider password-protected portals for individual review. We fully support sharing of our criteria in this responsible manner allowing transparency of this information to the parties who should receive it.

HealthyCT appreciates the opportunity to provide our comments and recommendations on SB372. We will continue to work with our partners to serve our members and meet the requirements of the Insurance Department. In summary, we feel C.G.S. 38a-591c, with the amendments proposed by SB372 addresses these issues appropriately.