



Health care reform at-a-glance External reviews for ASO plans

Why some ASO plans need to have an external review process

Under the Affordable Care Act (ACA or health care reform law), nongrandfathered health plans must allow plan members to request an external review through an Independent Review Organization (IRO) for certain types of denials. While some parts of the law don't apply to self-insured/ASO plans, this rule does. The rule took effect September 23, 2010.

To help you comply with this part of the law, we are offering to facilitate ACA-compliant external reviews on your behalf. We've contracted with three URAC-accredited IROs to conduct these reviews.

It's your choice whether to use our standard external review process or create your own process

However, we recommend that you use our standard process because:

- It is designed to allow for the most accurate and timely processing of appeals.
- It gives members a more consistent end-to-end experience.
- The cost for external reviews we facilitate for you (\$550 per review in 2012*) is most likely lower than what you would pay if you contracted directly with the IROs.

Talk to your sales or account manager

Because it's likely that most customers will want us to handle these reviews, we've started adding language about this process to new and renewing ASO groups' contracts. However, we will not pass through the charge for IRO reviews until you confirm that you want us to handle your plan's reviews. As you make this decision, keep in mind:

If you use our standard process ...	If you manage your own external reviews ...
With every adverse benefit determination, we will give your plan members our standard notice about their appeals rights. We will direct members to send their external review requests to us.	You will need to give us detailed information about your external review process so we can put the correct information on adverse benefit determinations and direct member requests properly.
We will evaluate requests to determine if they are eligible for external review. Effective September 20, 2011, the external review process is applicable only to non-administrative reviews (cases of medical judgment or rescission).	You or the organization of your choice will need to develop a process through which you will accept review requests and determine whether a request qualifies for external review.
We will facilitate the external review request, including random selection of the IRO.	You or the organization of your choice will need to contract with at least three IROs and refer reviews to one of these IROs randomly.
The IRO agency will charge us for the review, and then we will add a \$550-per-review charge to your ASO bill as applicable.*	You will pay the review fee directly to the IRO.
You can opt to manage your own external reviews at any time. If you do so, we will issue a contract amendment.	You can opt to use our standard process at any time. If you do so, we will issue a contract amendment.

* This amount may change in 2012 and later years. Any change would be accounted for in updates to your ASO contract.

Questions and answers

Q. What is your standard internal and external appeals process?

A. Under our standard appeals process for new and renewing ASO groups with nongrandfathered plans:

- The ASO plan delegates appeals adjudication authority to us.
- We will use the standardized first-level mandatory review process with the second-level voluntary process.
 - After the first-level process is complete, members are offered an external review at the same time they are offered the second-level review.
 - Second-level voluntary options include panel review, independent peer medical review or another process consistent with the company reviewing the appeal.
 - Members are not required to complete any voluntary level before pursuing an external review and may request an external review after completing a voluntary review.

All reviews will be completed in accordance with the requirements of the legislation. For more details about this process, visit our health care reform website, anthem.com/healthcarereform.

Q. Which IROs have you contracted with to do the external reviews required under ACA?

A. At this time we have contracted with the following URAC-accredited organizations to conduct our third-party external reviews under ACA:

- MCMC – For more information, visit their [website](#).
- Advanced Medical Reviews – For more information visit their [website](#).
- AllMed – For more information, visit their [website](#).

Q. How did you decide to charge \$550 per external review?

A. This amount is based on our experience with IRO reviews.

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