MHPAEA Summary Form Instructions

The below summary form is prepared to satisfy the requirements of 15-144 (m)(2), Insurance Article, Annotated Code of Maryland. The summary form must be made available to plan members and to the public on the carrier's website.

Confidential and proprietary information must be removed from the summary form. Confidential and proprietary information that is removed from the summary form must satisfy § 15-144(h)(1), Insurance Article, Annotated Code of Maryland.

The MHPAEA Summary Form includes the MHPAEA Data Report.

Carriers must use the terms defined in COMAR 31.10.51 and the *Instructions for MHPAEA NQTL Analysis Report and Data Report* to complete the summary form.

Preferred Provider Organization (PPO) PPO-OAP Traditional Open Access Plan

Under a federal law called the Mental Health Parity and Addiction Equity Act (MHPAEA), [carrier name] must make sure that there is "parity" between mental health and substance use disorder benefits, and medical and surgical benefits. This generally means that financial requirements and treatment limitations applied to mental health or substance use disorder benefits cannot be more restrictive than the financial requirements and treatment limitations applied to medical and surgical benefits. The types of limits covered by parity protections include:

- Financial requirements—such as deductibles, copayments, coinsurance, and out-of-pocket limits; and
- Treatment limitations—such as limits on the number of days or visits covered, or other limits on the scope or duration of treatment (for example, being required to get prior authorization).

Cigna Health & Life Insurance Company has performed an analysis of mental health parity as required by Maryland law and has submitted the required report to the State of Maryland. Below is a summary of that report.

If you have any questions on this summary, please contact Customer Service at 1 (800) 997-1654.

If you have questions on your specific health plan, please call	Behavioral Health Benefits 1 (800) 433-5768 24 hours a day, 365 days a year
	Medical, Dental, Vision

Medical, Dental, Vision 1 (800) 244-6224 24 hours a day, 365 days a year

TTY/TDD Service (For callers who are deaf or hard of hearing) Dial 711 and follow the prompts 24 hours a day, 365 days a year.

Overview:

We have identified the five health benefit plans with the highest enrollment for each product we offer in the individual, small, and large group markets, as applicable. These plans contain items called Non-Quantitative Treatment Limitations (NQTLs) that put limits on benefits paid. What these NQTL's are and how the health plans achieve parity are discussed below.

1. Definition of Medical Necessity

Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)	
Services Subject to Medical Necessity:	Services Subject to Medical Necessity:	
All inpatient and outpatient M/S services, whether in-network or out-of-network must be medically necessary. Services determined by Cigna not to be medically necessary would excluded under the terms of the plan.	All inpatient and outpatient MH/SUD services, whether in- network or out-of-network must be medically necessary. Services determined by Cigna not to be medically necessary would excluded under the terms of the plan.	
Cigna employs the same definition of medical necessity to medical/surgical (M/S) and mental health/substance use disorder (MH/SUD) benefits. Cigna Medical Directors apply the definition of "medical necessity" set forth in the governing plan instrument or the definition required by state law. Notwithstanding the above, Cigna's standard definition of "medical necessity" is as follows:	Cigna employs the same definition of medical necessity to medical/surgical (M/S) and mental health/substance use disorder (MH/SUD) benefits. Cigna Medical Directors apply the definition of "medical necessity" set forth in the governing plan instrument or the definition required by state law. Notwithstanding the above, Cigna's standard definition of "medical necessity" is as follows:	
Medically Necessary/Medical Necessity Health care services, supplies and medications provided for the purpose of preventing, evaluating, diagnosing or treating a Sickness, Injury, condition, disease or its symptoms, that are all of the following as determined by a Medical Director or Review Organization:	Medically Necessary/Medical Necessity Health care services, supplies and medications provided for the purpose of preventing, evaluating, diagnosing or treating a Sickness, Injury, condition, disease or its symptoms, that are all of the following as determined by a Medical Director or Review Organization:	
• required to diagnose or treat an illness, Injury, disease or its symptoms;	• required to diagnose or treat an illness, Injury, disease or its symptoms;	
• in accordance with generally accepted standards of medical practice;	• in accordance with generally accepted standards of medical practice;	
• clinically appropriate in terms of type, frequency, extent, site and duration;	• clinically appropriate in terms of type, frequency, extent, site and duration;	
• not primarily for the convenience of the patient, Physician or other health care provider;	• not primarily for the convenience of the patient, Physician or other health care provider;	
	• not more costly than an alternative service(s), medication(s) or	

 not more costly than an alternative service(s), medication(s) or supply(ies) that is at least as likely to produce equivalent therapeutic or diagnostic results with the same safety profile as to the prevention, evaluation, diagnosis or treatment of your Sickness, Injury, condition, disease or its symptoms; and rendered in the least intensive setting that is appropriate for the delivery of the services, supplies or medications. Where applicable, the Medical Director or Review Organization may compare the cost-effectiveness of alternative services, supplies, medications or settings when determining least intensive setting. 	 supply(ies) that is at least as likely to produce equivalent therapeutic or diagnostic results with the same safety profile as to the prevention, evaluation, diagnosis or treatment of your Sickness, Injury, condition, disease or its symptoms; and rendered in the least intensive setting that is appropriate for the delivery of the services, supplies or medications. Where applicable, the Medical Director or Review Organization may compare the cost-effectiveness of alternative services, supplies, medications or settings when determining least intensive setting.
In determining whether health care services, supplies, or	In determining whether health care services, supplies, or
medications are Medically Necessary, all elements of Medical	medications are Medically Necessary, all elements of Medical
Necessity must be met as specifically outlined in the individual's	Necessity must be met as specifically outlined in the individual's
benefit plan documents, the Medical Director or Review	benefit plan documents, the Medical Director or Review
Organization may rely on the clinical coverage policies	Organization may rely on the clinical coverage policies
maintained by Cigna or the Review Organization.	maintained by Cigna or the Review Organization.
Clinical coverage policies may incorporate, without limitation and	Clinical coverage policies may incorporate, without limitation and
as applicable, criteria relating to U.S. Food and Drug	as applicable, criteria relating to U.S. Food and Drug
Administration-approved labeling, the standard medical reference	Administration-approved labeling, the standard medical reference
compendia and peer-reviewed, evidence-based scientific literature	compendia and peer-reviewed, evidence-based scientific literature
or guidelines.	or guidelines.

B. Identify the factors used in the development of the limitation(s);

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Development of Clinical Criteria	Development of Clinical Criteria
Cigna utilizes its own internally developed Coverage Policies	Cigna utilizes its own internally developed Coverage Policies
(medical necessity criteria) and the MCG TM Guidelines when	(medical necessity criteria) and the MCG TM Guidelines when
conducting medical necessity reviews of M/S services, procedures,	conducting medical necessity reviews of MH services, procedures,
devices, equipment, imaging, diagnostic interventions.	devices, equipment, imaging, diagnostic interventions and the
	ASAM criteria for conducting medical necessity reviews of SUD

The Medical Technology Assessment Committee (MTAC)	services.
establishes and maintains clinical guidelines and medical necessity criteria in the form of published Coverage Policies pertaining to	The Medical Technology Assessment Committee (MTAC)
the various medical and behavioral health services, therapies,	establishes and maintains clinical guidelines and medical necessity
procedures, devices, technologies and pharmaceuticals to be used for utilization management purposes. This includes Coverage	criteria in the form of published Coverage Policies pertaining to the various medical and behavioral health services, therapies,
Policies that address medical/surgical services determined to be	procedures, devices, technologies and pharmaceuticals to be used
experimental and investigational.	for utilization management purposes. This includes Coverage Policies that address medical/surgical services determined to be
While Cigna's Coverage Policies and vendor guidelines are reviewed at least once annually, re-review of Coverage Policies	experimental and investigational.
and/or topics for new Coverage Policies are identified through	While Cigna's Coverage Policies and vendor guidelines are
multiple channels including requests from the provider community, customers, frontline reviewers, CPU and the impetus	reviewed at least once annually, re-review of Coverage Policies and/or topics for new Coverage Policies are identified through
of new, emerging and evolving technologies.	multiple channels including requests from the provider community, customers, frontline reviewers, CPU and the impetus
Also, the company's routine (occurring no less frequently than annually) Inter-Rater Reliability (IRR) process is used to evaluate	of new, emerging and evolving technologies.
consistency of clinical decision-making across reviewers and to	Also, the company's routine (occurring no less frequently than
identify any potential revisions to coverage policies that may be warranted. Of note, the company's most recent MH/SUD IRR	annually) Inter-Rater Reliability (IRR) process is used to evaluate consistency of clinical decision-making across reviewers and to
exercise did not reveal a need to revise its coverage policies	identify any potential revisions to coverage policies that may be
governing reviews of MH/SUD benefits.	warranted. Of note, the company's most recent MH/SUD IRR exercise did not reveal a need to revise its coverage policies
Factors	governing reviews of MH/SUD benefits.
The Medical Technology Assessment Committee (MTAC) establishes and maintains clinical guidelines and medical necessity	Factors
criteria in the form of published Coverage Policies pertaining to the various medical and behavioral health services, therapies,	The Medical Technology Assessment Committee (MTAC)
procedures, devices, technologies and pharmaceuticals to be used	establishes and maintains clinical guidelines and medical necessity criteria in the form of published Coverage Policies pertaining to
for utilization management purposes. This includes Coverage	the various medical and behavioral health services, therapies,
Policies that address medical/surgical services determined to be experimental and investigational.	procedures, devices, technologies and pharmaceuticals to be used for utilization management purposes. This includes Coverage
MTAC's policy development processes entails assessing behavioral health technologies based upon the following factors:	Policies that address medical/surgical services determined to be experimental and investigational.
Clinical efficacy	

SafetyAppropriateness of the proposed treatment	MTAC's policy development processes entails assessing behavioral health technologies based upon the following factors:	
	Clinical efficacySafetyAppropriateness of the proposed treatment	

C. Identify the sources (including any processes, strategies, or evidentiary standards) used to evaluate the factors identified above;

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Sources and Evidentiary Standards	Sources and Evidentiary Standards
Cigna's Coverage Policy Unit (CPU), in partnership with Cigna's	Cigna's Coverage Policy Unit (CPU), in partnership with Cigna's
Medical Technology Assessment Committee, conducts evidence-	Medical Technology Assessment Committee, conducts evidence-
based assessments of the medical literature and other sources of	based assessments of the medical literature and other sources of
information pertaining to the safety and effectiveness of medical	information pertaining to the safety and effectiveness of medical
and behavioral health services, therapies, procedures, devices,	and behavioral health services, therapies, procedures, devices,
technologies and pharmaceuticals. The Medical Technology	technologies and pharmaceuticals. The Medical Technology
Assessment Committee's evidence-based	Assessment Committee's evidence-based
medicine approach ranks the categories of evidence and assigns	medicine approach ranks the categories of evidence and assigns
greater weight to categories with higher levels of scientific	greater weight to categories with higher levels of scientific
evidence as set forth below in Cigna's "Levels of Scientific	evidence as set forth below in Cigna's "Levels of Scientific
Evidence Table" adapted from the Centre for Evidence Based	Evidence Table" adapted from the Centre for Evidence Based
Medicine, University of Oxford, March 2009:	Medicine, University of Oxford, March 2009:
 Level 1: Randomized Controlled Trials (RCT). Randomized, blinded, placebo-controlled, clinical trials and systematic reviews of RCTs and meta-analysis of RCTs. Level 2: Non-randomized controlled trials (an experimental study, but not an ideal design). Also systematic reviews and meta-analyses of non-randomized controlled trials. Level 3: Observational studies – e.g. cohort, case-control studies (non-experimental studies). Also systematic reviews and meta-analyses of observational studies. 	 Level 1: Randomized Controlled Trials (RCT). Randomized, blinded, placebo-controlled, clinical trials and systematic reviews of RCTs and meta-analysis of RCTs. Level 2: Non-randomized controlled trials (an experimental study, but not an ideal design). Also systematic reviews and meta-analyses of non-randomized controlled trials.

- Level 4: Descriptive studies, case reports, case series, panel Level 3: Observational studies – e.g. cohort, case-control studies (non-experimental studies), and retrospective analyses studies (non-experimental studies). Also systematic of any kind. Also systematic reviews and meta-analyses of reviews and meta-analyses of observational studies. retrospective studies. Level 4: Descriptive studies, case reports, case series, Level 5: Professional/organizational recommendations when panel studies (non-experimental studies), and ٠ based upon a valid evidence-based assessment of the available retrospective analyses of any kind. Also systematic literature. reviews and meta-analyses of retrospective studies. Level 5: Professional/organizational recommendations ٠ when based upon a valid evidence-based assessment of the available literature.
- Mental Health/Substance Use Disorder Benefits **Medical/Surgical Benefits** (M/S)(MH/SUD) Cigna utilizes its own internally developed Coverage Policies Cigna utilizes its own internally developed Coverage Policies (medical necessity criteria) and the MCGTM Guidelines when (medical necessity criteria) and the MCGTM Guidelines when conducting medical necessity reviews of M/S services, procedures, conducting medical necessity reviews of MH services, procedures, devices, equipment, imaging, diagnostic interventions. devices, equipment, imaging, diagnostic interventions and the ASAM criteria for conducting medical necessity reviews of SUD The Medical Technology Assessment Committee (MTAC) services. establishes and maintains clinical guidelines and medical necessity criteria in the form of published Coverage Policies pertaining to The Medical Technology Assessment Committee (MTAC) the various medical and behavioral health services, therapies, establishes and maintains clinical guidelines and medical necessity criteria in the form of published Coverage Policies pertaining to procedures, devices, technologies and pharmaceuticals to be used for utilization management purposes. This includes Coverage the various medical and behavioral health services, therapies, Policies that address medical/surgical services determined to be procedures, devices, technologies and pharmaceuticals to be used experimental and investigational. for utilization management purposes. This includes Coverage Policies that address medical/surgical services determined to be While Cigna's Coverage Policies and vendor guidelines are experimental and investigational. reviewed at least once annually, re-review of Coverage Policies and/or topics for new Coverage Policies are identified through While Cigna's Coverage Policies and vendor guidelines are multiple channels including requests from the provider reviewed at least once annually, re-review of Coverage Policies community, customers, frontline reviewers, CPU and the impetus and/or topics for new Coverage Policies are identified through of new, emerging and evolving technologies. multiple channels including requests from the provider
- D. Identify the methods and analysis used in the development of the limitation(s); and

	community, customers, frontline reviewers, CPU and the impetus
Also, the company's routine (occurring no less frequently than	of new, emerging and evolving technologies.
annually) Inter-Rater Reliability (IRR) process is used to evaluate	Also, the company's routine (occurring no less frequently than
consistency of clinical decision-making across reviewers and to	annually) Inter-Rater Reliability (IRR) process is used to evaluate
identify any potential revisions to coverage policies that may be	consistency of clinical decision-making across reviewers and to
warranted. Of note, the company's most recent MH/SUD IRR	identify any potential revisions to coverage policies that may be
exercise did not reveal a need to revise its coverage policies	warranted. Of note, the company's most recent MH/SUD IRR
governing reviews of MH/SUD benefits.	exercise did not reveal a need to revise its coverage policies
	governing reviews of MH/SUD benefits.

E. Provide any evidence and documentation to establish that the limitation(s) is applied no more stringently, as written and in operation, to mental health and substance use disorder benefits than to medical and surgical benefits.

Cigna's medical necessity coverage policy development and application process is consistent between M/S and MH/SUD. Cigna applies comparable evidence-based guidelines to define established standards of effective care in both M/S and MH/SUD benefits. Consistency in policy development, process and application evidences compliance with the NQTL requirement that the medical management process be applied comparably, and no more stringently, to MH/SUD services than to M/S services. Compliance is further demonstrated through Cigna's uniform definition of Medical Necessity for M/S and MH/SUD benefits.

An "in operation" review of Cigna's application of the medical necessity NQTL, specifically approvals and denials rates, for Prior Authorization, Retrospective Review, and Concurrent Review across benefit classifications for a sampling of Cigna plans revealed no statistically significant discrepancies in medical necessity denial rates as-between MH/SUD and M/S benefits. While operational outcomes are not determinative of NQTL compliance, and a plan may comply with the NQTL requirement notwithstanding a disparate outcome for an NQTL applied to MH/SUD benefits as compared to M/S benefits, comparable outcomes can help evidence compliance with the in-operation component of the NQTL requirement. Consequently, Cigna concludes that the NQTL was applied comparably and no more stringently to MH/SUD benefits than to M/S benefits. In performing the operational analysis of the application of UM, Cigna reviewed denial rates for both M/S and MH/SUD within each classification of benefits and for benefits subject to prior authorization, concurrent review, and retrospective review.

2. Prior Authorization Review Process

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
 Prior Authorization/Pre-Authorized The term Prior Authorization means the approval that a Participating Provider must receive from the Review Organization, prior to services being rendered, in order for certain services and benefits to be covered under this policy. Services that require Prior Authorization include, but are not limited to: inpatient Hospital services, except for 48/96 hour maternity stays. inpatient services at any participating Other Health Care Facility. residential treatment. outpatient facility services. partial hospitalization. intensive outpatient programs. advanced radiological imaging. non-emergency ambulance. certain Medical Pharmaceuticals. home health care services. radiation therapy. transplant services. 	 Prior Authorization/Pre-Authorized The term Prior Authorization means the approval that a Participating Provider must receive from the Review Organization, prior to services being rendered, in order for certain services and benefits to be covered under this policy. Services that require Prior Authorization include, but are not limited to: inpatient Hospital services, except for 48/96 hour maternity stays. inpatient services at any participating Other Health Care Facility. residential treatment. outpatient facility services. partial hospitalization. intensive outpatient programs. advanced radiological imaging. non-emergency ambulance. certain Medical Pharmaceuticals. home health care services. radiation therapy. transplant services.

- **Medical/Surgical Benefits** Mental Health/Substance Use Disorder Benefits (MH/SUD) (M/S)The strategy used to design and apply the prior Inpatient, The strategy used to design and apply the prior authorization/precertification review NQTL to M/S authorization/precertification review NQTL to MH/SUD **In-Network** benefits is ensuring appropriate utilization of services for benefits is ensuring appropriate utilization of services for benefit purposes and, as appropriate, care planning. benefit purposes and, as appropriate, care planning. When When determining that M/S Inpatient, In-Network determining which MH/SUD Inpatient In-Network benefits are subject to pre-service medical necessity benefits are subject to pre-service medical necessity review (i.e., prior authorization/precertification), Cigna review (i.e., prior authorization/precertification), Cigna conducted a cost-benefit analysis based upon the conducted a cost-benefit analysis based upon the following factors: following factors: Cost of treatment/procedure Cost of treatment/procedure Whether treatment type is a driver of high cost Whether treatment type is a driver of high cost ٠ growth growth Variability in cost, quality and utilization based Variability in cost, quality and utilization based ٠ • upon diagnosis, treatment type, provider type and/or upon diagnosis, treatment type, provider type and/or geographic region geographic region Treatment types subject to a higher potential for Treatment types subject to a higher potential for ٠ ٠ fraud, waste and/or abuse fraud, waste and/or abuse Projected return on investment and/or savings if Projected return on investment and/or savings if ٠ treatment type is subjected to pre-service review treatment type is subjected to pre-service review **Outpatient** Outpatient, In-Network office visits do not require prior Outpatient, In-Network office visits do not require prior Office authorization. authorization. Visits, In-Network Cigna conducts a cost-benefit analysis based upon the Cigna conducts a cost-benefit analysis based upon the All Other following factors: following factors: Outpatient Cost of treatment/procedure Cost of treatment/procedure Services. ٠ **In-Network** Whether treatment type is a driver of high cost Whether treatment type is a driver of high cost ٠ growth growth Variability in cost, quality and utilization based Variability in cost, quality and utilization based ٠ ٠ upon diagnosis, treatment type, provider type and/or upon diagnosis, treatment type, provider type and/or geographic region geographic region
- B. Identify the factors used in the development of the limitation(s);

	 Treatment types subject to a higher potential for fraud, waste and/or abuse Projected return on investment and/or savings 	 Treatment types subject to a higher potential for fraud, waste and/or abuse Projected return on investment and/or savings if
Inpatient, Out-of- Network	 greater than 2. When determining that M/S Inpatient, In-Network benefits are subject to pre-service medical necessity review (i.e., prior authorization/precertification), Cigna conducted a cost-benefit analysis based upon the following factors: Cost of treatment/procedure Whether treatment type is a driver of high cost growth Variability in cost, quality and utilization based upon diagnosis, treatment type, provider type and/or geographic region Treatment types subject to a higher potential for fraud, waste and/or abuse Projected return on investment and/or savings if treatment type is subjected to pre-service review 	 treatment type is subjected to pre-service review When determining which MH/SUD Inpatient In-Network benefits are subject to pre-service medical necessity review (i.e., prior authorization/precertification), Cigna conducted a cost-benefit analysis based upon the following factors: Cost of treatment/procedure Whether treatment type is a driver of high cost growth Variability in cost, quality and utilization based upon diagnosis, treatment type, provider type and/or geographic region Treatment types subject to a higher potential for fraud, waste and/or abuse Projected return on investment and/or savings if treatment type is subjected to pre-service review
	Because the benefit or value of conducting pre-service review of the treatment type outweighs the administrative costs associated with conducting the review, the treatment type is subject to pre-service medical necessity review (prior authorization).	Because the benefit or value of conducting pre-service review of the treatment type outweighs the administrative costs associated with conducting the review, the treatment type is subject to pre-service medical necessity review (prior authorization).
Outpatient Office Visits, Out- of-Network	Office Visits are never subject to prior authorization, including - Outpatient, Out-of-Network: Office Visits.	Office Visits are never subject to prior authorization, including - Outpatient, Out-of-Network: Office Visits.
All Other Outpatient Services, Out-of- Network	 Cigna conducts a cost-benefit analysis based upon the following factors: Cost of treatment/procedure Whether treatment type is a driver of high cost growth 	 Cigna conducts a cost-benefit analysis based upon the following factors: Cost of treatment/procedure Whether treatment type is a driver of high cost growth

•	Variability in cost, quality and utilization based	٠	Variability in cost, quality and utilization based
	upon diagnosis, treatment type, provider type and/or		upon diagnosis, treatment type, provider type and/or
	geographic region		geographic region
•	Treatment types subject to a higher potential for	٠	Treatment types subject to a higher potential for
	fraud, waste and/or abuse		fraud, waste and/or abuse
•	Projected return on investment and/or savings	٠	Projected return on investment and/or savings
	greater than 2.		greater than 2.

C. Identify the sources (including any processes, strategies, or evidentiary standards) used to evaluate the factors identified above;

	Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
Inpatient, In-Network Outpatient Office Visits, In-	 Internal claims data UM program operating costs UM authorization data Expert Medical Review Nationally recognized evidence-based guidelines Outpatient, In-Network office visits do not require prior authorization. 	 Internal claims data UM program operating costs UM authorization data Expert Medical Review Nationally recognized evidence-based guidelines Outpatient, In-Network office visits do not require prior authorization.
Network All Other Outpatient Services, In-Network	 COGNOS Internal claims database including measures for volume of services approved, denied, total authorizations, denial rates estimated average cost, cost to review, estimated savings, per member per month savings, return on investment and contracted rates. Expert Medical Review Input from national vendors Medical Economics biannual provider and facility analyses report for codes not included on precertification list 	 COGNOS Internal claims database including measures for volume of services approved, denied, total authorizations, denial rates estimated average cost, cost to review, estimated savings, per member per month savings, return on investment and contracted rates. Expert Medical Review Input from national vendors Medical Economics biannual provider and facility analyses report for codes not included on precertification list Nationally recognized evidence-based

	Nationally recognized evidence-based guidelines and	guidelines and CMS and HCPS updates
	CMS and HCPS updates	
Inpatient,	Internal claims data	Internal claims data
Out-of-	• UM program operating costs	• UM program operating costs
Network	• UM authorization data	UM authorization data
	Expert Medical Review	Expert Medical Review
	• Nationally recognized evidence-based guidelines	Nationally recognized evidence-based guidelines
Outpatient	Office Visits are never subject to prior authorization,	Office Visits are never subject to prior authorization,
Office	including - Outpatient, Out-of-Network: Office Visits.	including - Outpatient, Out-of-Network: Office Visits.
Visits, Out-		
of-Network		
All Other	 COGNOS Internal claims database including 	COGNOS Internal claims database including
Outpatient	measures for volume of services approved,	measures for volume of services approved,
Services,	denied, total authorizations, denial rates estimated	denied, total authorizations, denial rates estimated
Out-of-	average cost, cost to review, estimated savings,	average cost, cost to review, estimated savings,
Network	per member per month savings, return on	per member per month savings, return on
	investment and contracted rates.	investment and contracted rates.
	Expert Medical Review	Expert Medical Review
	 Input from national vendors 	Input from national vendors
	• Medical Economics biannual provider and facility	Medical Economics biannual provider and facility
	analyses report for codes not included on	analyses report for codes not included on
	precertification list	precertification list
	 Nationally recognized evidence-based 	 Nationally recognized evidence-based
	guidelines and CMS and HCPS updates	guidelines and CMS and HCPS updates

D. Identify the methods and analysis used in the development of the limitation(s); and

	Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
Inpatient,	Cigna has determined the value of subjecting all	Cigna has determined the value of subjecting all
In-Network	inpatient in-network M/S and MH/SUD services to	inpatient in-network M/S and MH/SUD services to
	prior authorization/precertification review must exceed	prior authorization/precertification review must exceed
	the administrative costs by at least 1:1.	the administrative costs by at least 1:1.

	Clinical Appropriateness is defined as those services that as determined in the exercise of the professional judgement of Cigna's internal medical experts, are in accordance with generally accepted standards of care and nationally recognized guidelines. Nationally recognized guidelines are included in Cigna's "Levels of Scientific Evidence Table" adapted from the Centre for Evidence Based Medicine, University of Oxford, March 2009 as outlined in the development of clinical criteria of Medical Necessity.	Clinical Appropriateness is defined as those services that as determined in the exercise of the professional judgement of Cigna's internal medical experts, are in accordance with generally accepted standards of care and nationally recognized guidelines. Nationally recognized guidelines are included in Cigna's "Levels of Scientific Evidence Table" adapted from the Centre for Evidence Based Medicine, University of Oxford, March 2009 as outlined in the development of clinical criteria of Medical Necessity.
	Because the benefit or value of conducting pre-service review of the treatment type outweighs the administrative costs associated with conducting the review, the treatment type is subject to pre-service medical necessity review (prior authorization).	Because the benefit or value of conducting pre-service review of the treatment type outweighs the administrative costs associated with conducting the review, the treatment type is subject to pre-service medical necessity review (prior authorization).
	No M/S inpatient benefits are subject to fail-first and/or step therapy requirements.	No MH/SUD inpatient benefits are subject to fail-first and/or step therapy requirements.
Outpatient Office Visits, In- Network	Outpatient, In-Network office visits do not require prior authorization.	Outpatient, In-Network office visits do not require prior authorization.
All Other Outpatient Services, In-Network	The evidentiary standard for the application of prior authorization/precertification review of Out Patient All Other M/S services is the value of subjecting the Out Patient All Other in-network M/S services to prior authorization/precertification review must exceed the administrative costs with a Return on Investment less than 2. Codes with ROI greater than 2 are considered operationally effective and not typically considered for removal without an additional factor, such as for example the services subject to higher potential for fraud waste and/or abuse.	The evidentiary standard for the application of prior authorization/precertification review of Out Patient All Other M/S services is the value of subjecting the Out Patient All Other in-network M/S services to prior authorization/precertification review must exceed the administrative costs with a Return on Investment less than 2. Codes with ROI greater than 2 are considered operationally effective and not typically considered for removal without an additional factor, such as for example the services subject to higher potential for fraud waste and/or abuse.

	No M/S outpatient benefits, with the exception of certain M/S injectable drugs, are subject to fail-first and/or step	No MH/SUD outpatient benefits are subject to fail-first and/or step therapy requirements.
	therapy requirements.	
Inpatient,	Cigna has determined the value of subjecting all	Cigna has determined the value of subjecting all
Out-of-	inpatient out-of-network M/S and MH/SUD services to	inpatient out-of-network M/S and MH/SUD services to
Network	prior authorization/precertification review must exceed the administrative costs by at least 1:1.	prior authorization/precertification review must exceed the administrative costs by at least 1:1.
	Clinical Appropriateness is defined as those services	Clinical Appropriateness is defined as those services
	that as determined in the exercise of the professional	that as determined in the exercise of the professional
	judgement of Cigna's internal medical experts, are in accordance with generally accepted standards of care and nationally recognized guidelines. Nationally	judgement of Cigna's internal medical experts, are in accordance with generally accepted standards of care and nationally recognized guidelines. Nationally
	recognized guidelines are included in Cigna's "Levels	recognized guidelines are included in Cigna's "Levels
	of Scientific Evidence Table" adapted from the Centre	of Scientific Evidence Table" adapted from the Centre
	for Evidence Based Medicine, University of Oxford,	for Evidence Based Medicine, University of Oxford,
	March 2009 as outlined in the development of clinical	March 2009 as outlined in the development of clinical
	criteria of Medical Necessity.	criteria of Medical Necessity.
	No M/S inpatient benefits are subject to fail-first and/or	No MH/SUD inpatient benefits are subject to fail-first
<u> </u>	step therapy requirements.	and/or step therapy requirements.
Outpatient	Office Visits are never subject to prior authorization,	Office Visits are never subject to prior authorization,
Office	including - Outpatient, Out-of-Network: Office Visits.	including - Outpatient, Out-of-Network: Office Visits.
Visits, Out-		
of-Network		
All Other	The evidentiary standard for the application of prior	The evidentiary standard for the application of prior
Outpatient	authorization/precertification review of Out Patient All	authorization/precertification review of Out Patient All
Services,	Other M/S services is the value of subjecting the Out	Other M/S services is the value of subjecting the Out
Out-of-	Patient All Other in-network M/S services to prior	Patient All Other in-network M/S services to prior
Network	authorization/precertification review must exceed the	authorization/precertification review must exceed the
	administrative costs with a Return on Investment less	administrative costs with a Return on Investment less
	than 2. Codes with ROI greater than 2 are considered	than 2. Codes with ROI greater than 2 are considered
	operationally effective and not typically considered for	operationally effective and not typically considered for
	removal without an additional factor, such as for	removal without an additional factor, such as for

1	the services subject to higher potential for aste and/or abuse.	example the services subject to higher potential for fraud waste and/or abuse.
M/S inje	outpatient benefits, with the exception of certain ectable drugs, are subject to fail-first and/or step requirements.	No M/S outpatient benefits, with the exception of certain M/S injectable drugs, are subject to fail-first and/or step therapy requirements.

E. Provide any evidence and documentation to establish that the limitation(s) is applied no more stringently, as written and in operation, to mental health and substance use disorder benefits than to medical and surgical benefits.

Inpatient, In-Network	Cigna applies prior authorization NQTL consistently to M/S benefits and MH/SUD benefits across benefit classifications. For both in-network and out-of-network M/S and MH/SUD benefits, Cigna requires prior authorization of non-emergent inpatient services. In reaching this conclusion, Cigna has assessed several components of its utilization management program for NQTL compliance, including the methodology for determining which services will be subject to utilization management, the process for reviewing utilization management requests, and the process for applying coverage criteria.
	The process by which prior authorization is applied to M/S and MH/SUD inpatient, in-network benefits is comparable and applied no more stringently to MH/SUD inpatient benefits.
	Coverage determinations of both M/S services and MH/SUD services are made in accordance with evidence-based treatment guidelines by physician peer reviewers licensed in the same or similar specialty area as the treating provider. Moreover, Cigna's methodology for determining which MH/SUD services within a classification of benefits are subject to prior authorization is comparable to, and applied no more stringently than, its methodology for determining which medical/surgical services within the same classification of benefits are subject to prior authorization.
	Cigna's methodology for determining which medical/surgical services and which MH/SUD services within a classification of benefits are subject to prior authorization, as written in policy/procedure and in operation, as well as its pre-service medical necessity review processes applied to medical/surgical services and for MH/SUD services as written and in operation, reflect they are comparable and no more stringent for MH/SUD services within a classification of benefits than for medical/surgical services within the same classification of benefits.
	An "in operation" review of Cigna's application of the Prior Authorization NQTL, specifically approvals and denial information, in the In-Patient, In-Network classification for a sampling of plans revealed no statistically significant

	discrepancies in denial rates as-between MH/SUD and M/S benefits. While operational outcomes are not determinative of NQTL compliance, and an insurer may comply with the NQTL requirement notwithstanding a disparate outcome for an NQTL applied to MH/SUD benefits as compared to M/S benefits, comparable outcomes can have available outcomes are not for an NQTL applied to MH/SUD benefits as compared to M/S benefits, comparable outcomes can
	help evidence compliance with the in-operation component of the NQTL requirement. Consequently, Cigna concludes that the NQTL was applied comparably and no more stringently to MH/SUD benefits than to M/S benefits.
Outpatient Office Visits, In- Network	Outpatient, In-Network office visits for M/S and MH/SUD benefits do not require prior authorization.
All Other Outpatient Services, In-Network	Cigna applies the prior authorization NQTL consistently to M/S benefits and MH/SUD benefits. In reaching this conclusion, Cigna has assessed several components of its utilization management program for NQTL compliance, including the methodology for determining which services will be subject to utilization management, the process for reviewing utilization management requests, and the process for applying coverage criteria.
	Coverage determinations of medical/surgical services and MH/SUD services are made in accordance with evidence- based treatment guidelines by physician peer reviewers licensed in the same or similar specialty area as the treating provider. Moreover, Cigna's methodology for determining which MH/SUD services within a classification of benefits are subject to prior authorization is comparable to, and applied no more stringently than, its methodology for determining which medical/surgical services within the same classification of benefits are subject to prior authorization.
	Cigna's methodology for determining which medical/surgical services and which MH/SUD services within a classification of benefits are subject to prior authorization as written and in operation, as well as its pre-service medical necessity review processes applied to medical/surgical services and for MH/SUD services as written and in operation reflect they are comparable and no more stringent for MH/SUD services within a classification of benefits than for medical/surgical services within the same classification of benefits.
	An "in operation" review of Cigna's application of the Prior Authorization NQTL, specifically approvals and denial information, in the Outpatient, In-Network, All Other classification for a sampling of plans revealed no statistically significant discrepancies in denial rates as-between MH/SUD and M/S benefits. While operational outcomes are not determinative of NQTL compliance, and an insurer may comply with the NQTL requirement notwithstanding a disparate outcome for an NQTL applied to MH/SUD benefits as compared to M/S benefits, comparable outcomes can help evidence compliance with the in-operation component of the NQTL requirement. Consequently, Cigna concludes that the NQTL was applied comparably and no more stringently to MH/SUD benefits than to M/S benefits.

Cigna applies prior authorization NQTL consistently to M/S benefits and MH/SUD benefits across benefit classifications. For both in-network and out-of-network M/S and MH/SUD benefits, Cigna requires prior authorization of non-emergent inpatient services. In reaching this conclusion, Cigna has assessed several components of its utilization management program for NQTL compliance, including the methodology for determining which services will be subject to utilization management, the process for reviewing utilization management requests, and the process for applying coverage criteria.				
Coverage determinations of medical/surgical services and MH/SUD services are made in accordance with evidence based treatment guidelines by physician peer reviewers licensed in the same or similar specialty area as the treating provider. Moreover, Cigna's methodology for determining which MH/SUD services within a classification of bene are subject to prior authorization is comparable to, and applied no more stringently than, its methodology for determining which medical/surgical services within the same classification of benefits are subject to prior authorization.				
Cigna's methodology for determining which medical/surgical services and which MH/SUD services within a classification of benefits are subject to prior authorization, as written in policy/procedure and in operation, as well as its pre-service medical necessity review processes applied to medical/surgical services and for MH/SUD services as written and in operation, reflect they are comparable and no more stringent for MH/SUD services within a classification of benefits than for medical/surgical services within the same classification of benefits.				
An "in operation" review of Cigna's application of the Prior Authorization NQTL, specifically approvals and denial information, in the In-Patient, Out-of-Network classification revealed no statistically significant discrepancies in denial rates as-between MH/SUD and M/S benefits. While operational outcomes are not determinative of NQTL compliance, and an insurer may comply with the NQTL requirement notwithstanding a disparate outcome for an NQTL applied to MH/SUD benefits as compared to M/S benefits, comparable outcomes can help evidence compliance with the in-operation component of the NQTL requirement. Consequently, Cigna concludes that the NQTL was applied comparably and no more stringently to MH/SUD benefits than to M/S benefits.				
Outpatient, Out-of-Network, Office Visits for M/S and MH/SUD benefits do not require prior authorization. Because				
the prior authorization NQTL does not apply to MH/SUD benefits, no further analysis of compliance with the NQTL				
requirement is warranted.				
requirement to manufacture.				
Cigna applies prior authorization/precertification NQTL consistently to M/S benefits and MH/SUD benefits.				
In both M/S and MH/SUD services, for both in-network and out-of-network M/S and MH/SUD benefits Cigna requires prior-authorization of non-emergent in-patient services, and for some, but not all outpatient services based				

Out-of- Network	upon the same array of factors which include the cost of treatment (i.e. unit cost and trended cost of services); high cost growth (i.e. high utilization relative to benchmark); variability in cost and quality; provider discretion in determining type and length of treatment; clinical efficacy of proposed course of treatment; and claim/treatment types subject to a higher percentage of fraud, waste and/or abuse.
	Coverage determinations of medical/surgical services and MH/SUD services are made in accordance with evidence- based treatment guidelines by physician peer reviewers licensed in the same or similar specialty area as the treating provider. Moreover, Cigna's methodology for determining which MH/SUD services within a classification of benefits are subject to prior authorization is comparable to, and applied no more stringently than, its methodology for determining which medical/surgical services within the same classification of benefits are subject to prior authorization.
Cigna's methodology for determining which medical/surgical services and which MH/SUD services with classification of benefits are subject to prior authorization as written and in operation, as well as its pre-sunecessity review processes applied to medical/surgical services and for MH/SUD services as written and reflect they are comparable and no more stringent for MH/SUD services within a classification of benefit medical/surgical services within the same classification of benefits.	
	An "in operation" review of Cigna's application of the Prior Authorization NQTL, specifically approvals and denial information, in the "Outpatient, Out-of-Network, All Other Items and Services" classification revealed no statistically significant discrepancies in denial rates as-between MH/SUD and M/S benefits. While operational outcomes are not determinative of NQTL compliance, and an insurer may comply with the NQTL requirement notwithstanding a disparate outcome for an NQTL applied to MH/SUD benefits as compared to M/S benefits, comparable outcomes can help evidence compliance with the in-operation component of the NQTL requirement. Consequently, Cigna concludes that the NQTL was applied comparably and no more stringently to MH/SUD benefits than to M/S benefits.

3. <u>Concurrent Review Process</u>

	Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
	Concurrent Determinations When an ongoing course of treatment has been approved for you and you wish to extend the approval, you or your representative must request a required concurrent coverage determination at least 24 hours prior to the expiration of the approved period of time or number of treatments. When you or your representative requests such a determination, Cigna will notify you or your representative of the determination within 24 hours after receiving the request.	Concurrent Determinations When an ongoing course of treatment has been approved for you and you wish to extend the approval, you or your representative must request a required concurrent coverage determination at least 24 hours prior to the expiration of the approved period of time or number of treatments. When you or your representative requests such a determination, Cigna will notify you or your representative of the determination within 24 hours after receiving the request.
Inpatient,	Inpatient, In-Network Services Subject to Concurrent	Inpatient, In-Network Services Subject to Concurrent
In-Network	Care Review Concurrent Care Review for Inpatient, In-Network M/S services is the ongoing assessment to determine medical necessity of the care provided and appropriateness of the clinical setting during confinement in a hospital, skilled nursing or rehabilitation or other facility. Concurrent review is applied to all inpatient benefits, with the exception of any services reimbursed to the provider on a case rate/Diagnostic Resource Group (DRG) basis, including non-emergent M/S services:	Care Review Concurrent Care Review for Inpatient, In-Network MH/SUD services is the ongoing assessment to determine medical necessity of the care provided and appropriateness of the clinical setting during confinement in a hospital, skilled nursing or rehabilitation or other facility. Concurrent review is applied to all inpatient benefits, with the exception of any services reimbursed to the provider on a case rate/Diagnostic Resource Group (DRG) basis, including non-emergent MH/SUD services:
	M/S Inpatient Services Include: Acute Inpatient Services Subacute Inpatient Services, i.e. Skilled	MH/SUD Inpatient Services Include:Mental Health Acute Inpatient ServicesMental Health Subacute Residential Treatment
	Nursing Care, physical rehabilitation hospitals, etc.	Mental Health Inpatient Professional Services SUD Acute Inpatient Services
	Inpatient Professional Services	SUD Acute Impatient DetoxificationSUD Subacute Residential Treatment

		SUD Inpatient Professional Services
Outpatient	Outpatient Office Visits, In Network Subject to	Outpatient Office Visits, In Network Subject to
Office	Concurrent Care Review: NONE.	Concurrent Care Review: NONE.
Visits, In-		
Network	Office Visits are not subject to concurrent review,	Office Visits are not subject to concurrent review, including
	including - Outpatient, In-Network: Office Visits	- Outpatient, In-Network: Office Visits
All Other	All Other Outpatient, In-Network Services Subject to	All Other Outpatient, In-Network Services Subject to
Outpatient	Concurrent Review	Concurrent Review
Services,	Certain non-routine outpatient services are subject to	Certain non-routine outpatient services are subject to
In-Network	concurrent care medical necessity review for the ongoing	concurrent care medical necessity review for the ongoing
	assessment to determine medical necessity of the care	assessment to determine medical necessity of the care
	provided.	provided.
	All Other Outpatient M/S Services Include: Advanced imaging services (e.g., CT scans,	All Other Outpatient MH/SUD Services Include:
	PET scans, MRIs, diagnostic cardiology	Partial Hospitalization
	Certain outpatient surgical procedures	Intensive Outpatient Services (IOP)
	Certain cardiology procedures	Applied Behavior Analysis (ABA)
	Clinical Trials	Transcranial Magnetic Stimulation (TMS)
	Procedures that may be considered cosmetic in	Unlisted procedures or services where no
	nature	existing CPT code exists for such procedure or
	Durable Medical Equipment (DME)	service
	Experimental/Investigational/Unproven (EIU)	501 1100
	Procedures	
	Genetic Testing	
	Home Health Care (HHC)/Home Infusion	
	Therapy	
	Hormone Implant	
	Hyperbaric Oxygen Therapy	
	Infertility Services	
	Infused/Injectable Medications	
	Medical Oncology	
	Musculoskeletal Services (major joint surgery	
	and pain management services)	

Inpatient,	Outpatient Therapy Services (Outpatient Acute Rehabilitation, Cardiac Rehabilitation, Cognitive Rehabilitation, Speech Therapy, Hearing Therapy, Occupational Therapy, Physical Therapy, Chiropractic, Acupuncture)Outpatient Radiation Therapy ServicesSleep TestingSpeech TherapyTherapeutic apheresis (Extracorporeal Photopheresis (ECP))External CounterpulsationUnlisted procedures or services where no existing CPT code exists for such procedure or serviceInpatient, Out-of-Network Services Subject to		Inpatient, Out-of-Network Services Subject to	
Out-of-	Concurrent Care Review		Concurrent Care Review	
Network	Cigna does not distinguish between In-Network and O	ut-	Cigna does not distinguish between In-Network and Out-of-	-
	of-Network services for concurrent care review.		Network services for concurrent care review. Concurrent	
	Concurrent review is applied to all inpatient benefits,		review is applied to all inpatient benefits, with the exception	1
	with the exception of any services reimbursed to the provider on a case rate/Diagnostic Resource Group		of any services reimbursed to the provider on a case rate/Diagnostic Resource Group (DRG) basis, including	
	(DRG) basis, including non-emergent M/S services		non-emergent MH/SUD services rendered by a hospital or	
	rendered by a hospital or other facility to plan enrollee	s	other facility to plan enrollees who are confined overnight to	0
	who are confined overnight to the hospital or other		the hospital or other facility:	-
	facility:			
			MH/SUD Inpatient Services Include:	
	M/S Inpatient Services Include:		Mental Health Acute Inpatient Services	
	Acute Inpatient Services		Mental Health Subacute Residential Treatment	
	Subacute Inpatient Services, i.e. Skilled Nursing Care, physical rehabilitation hospitals,		Mental Health Inpatient Professional Services	
	etc.		SUD Acute Inpatient Services SUD Acute Impatient Detoxification	
	Inpatient Professional Services		SUD Acute Impatient Detoxification	
	inputent i forossionul Services		SUD Inpatient Professional Services	
Outpatient	Outpatient Office Visits, Out-of-Network Subject to	0	Outpatient Office Visits, Out-of-Network Subject to	_
Office	Concurrent Care Review: NONE.	-	Concurrent Care Review: NONE.	

Visits, Out- of-Network	Cigna does not distinguish between In-Network and Out- of-Network services for concurrent care review. Office Visits are not subject to concurrent review, including - Outpatient, Out-of-Network: Office Visits	Cigna does not distinguish between In-Network and Out-of- Network services for concurrent care review. Office Visits are not subject to concurrent review, including - Outpatient, Out-of-Network: Office Visits
All Other Outpatient Services, Out-of- Network	All Other Out patient, Out-of-Network Services Subject to Concurrent Review Cigna does not distinguish between In-Network and Out- of-Network services for concurrent care review. Certain non-routine outpatient services are subject to concurrent care medical necessity review. M/S All Other Outpatient Services Include: Advanced imaging services (e.g., CT scans, PET scans, MRIs, diagnostic cardiology Certain outpatient surgical procedures Certain cardiology procedures Clinical Trials	All Other Out patient, Out-of-Network Services Subject to Concurrent Review Cigna does not distinguish between In-Network and Out-of-Network services for concurrent care review. Certain non-routine outpatient services are subject to concurrent care medical necessity review. MH/SUD All Other Outpatient Services Include: Partial Hospitalization Intensive Outpatient Services (IOP) Applied Behavior Analysis (ABA) Transcranial Magnetic Stimulation (TMS)
	Clinical HildsProcedures that may be considered cosmetic in natureDurable Medical Equipment (DME)Experimental/Investigational/Unproven (EIU) ProceduresGenetic TestingHome Health Care (HHC)/Home Infusion TherapyHormone ImplantHyperbaric Oxygen TherapyInfertility ServicesInfused/Injectable Medications Medical OncologyMusculoskeletal Services (major joint surgery and pain management services)Outpatient Therapy Services (Outpatient Acute Rehabilitation, Cardiac Rehabilitation,	Unlisted procedures or services where no existing CPT code exists for such procedure or service

Cognitive Rehabilitation, Speech Therapy,	Τ
Hearing Therapy, Occupational Therapy,	
Physical Therapy, Chiropractic, Acupuncture)	
Outpatient Radiation Therapy Services	1
Sleep Testing	1
Speech Therapy	1
Therapeutic apheresis (Extracorporeal	1
Photopheresis (ECP))	
External Counterpulsation]
Unlisted procedures or services where no]
existing CPT code exists for such procedure or	
service	

B. Identify the factors used in the development of the limitation(s);

	Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
Inpatient,	When determining which M/S inpatient benefits are	When determining which MH/SUD inpatient benefits are
In-Network	subject to concurrent care medical necessity review,	subject to concurrent care medical necessity review, Cigna
	Cigna conducts a cost-benefit analysis based upon the	conducts a cost-benefit analysis based upon the following
	following factors:	factors:
	Cost of treatment/procedure	Cost of treatment/procedure
	 Whether treatment type is a driver of high cost growth Variability in cost, quality and utilization based upon diagnosis, treatment type, provider type and/or geographic region Treatment types subject to a higher potential for fraud, waste and/or abuse Projected return on investment and/or savings if treatment type is subjected to concurrent care review Clinical Appropriateness of concurrent review resulting in optimal clinical outcomes. 	 Whether treatment type is a driver of high cost growth Variability in cost, quality and utilization based upon diagnosis, treatment type, provider type and/or geographic region Treatment types subject to a higher potential for fraud, waste and/or abuse Projected return on investment and/or savings if treatment type is subjected to concurrent care review Clinical Appropriateness of concurrent review resulting in optimal clinical outcomes.
		If the benefit or value of conducting concurrent care review

	If the benefit or value of conducting concurrent care review of the treatment type outweighs the administrative costs associated with conducting the review, and the concurrent review is clinically appropriate for the level of care according to the applicable clinical criteria of the services, the treatment type is subject to concurrent care medical necessity review.	of the treatment type outweighs the administrative costs associated with conducting the review, and the concurrent review is clinically appropriate for the level of care according to the applicable clinical criteria of the services, the treatment type is subject to concurrent care medical necessity review.
Outpatient Office Visits, In- Network	Outpatient Office Visits, In Network Subject to Concurrent Care Review: NONE. Office Visits are not subject to concurrent review,	Outpatient Office Visits, In Network Subject to Concurrent Care Review: NONE. Office Visits are not subject to concurrent review, including
All Other Outpatient Services, In-Network	 including - Outpatient, In-Network: Office Visits When determining which M/S benefits are subject to concurrent care medical necessity review, Cigna conducts a cost-benefit analysis based upon the following factors: Cost of treatment/procedure Whether treatment type is a driver of high cost growth Variability in cost, quality and utilization based upon diagnosis, treatment type, provider type and/or geographic region 	 Outpatient, In-Network: Office Visits When determining which MH/SUD benefits are subject to concurrent care medical necessity review, Cigna conducts a cost-benefit analysis based upon the following factors: Cost of treatment/procedure Whether treatment type is a driver of high cost growth Variability in cost, quality and utilization based upon diagnosis, treatment type, provider type and/or geographic region Treatment types subject to a higher potential for fraud, waste and/or abuse
	 Treatment types subject to a higher potential for fraud, waste and/or abuse Projected return on investment and/or savings if treatment type is subjected to concurrent care review Because the benefit or value of conducting concurrent care review of the treatment type outweighs the administrative costs associated with conducting the review, the treatment type is subject to concurrent care medical necessity review. 	 Projected return on investment and/or savings if treatment type is subjected to concurrent care review Because the benefit or value of conducting concurrent care review of the treatment type outweighs the administrative costs associated with conducting the review, the treatment type is subject to concurrent care medical necessity review.
Inpatient, Out-of- Network	When determining which M/S inpatient benefits are subject to concurrent care medical necessity review,	When determining which MH/SUD inpatient benefits are subject to concurrent care medical necessity review, Cigna

	Cigna conducts a cost-benefit analysis based upon the	conducts a cost-benefit analysis based upon the following
	following factors:	factors:
	Cost of treatment/procedure	Cost of treatment/procedure
	• Whether treatment type is a driver of high cost	• Whether treatment type is a driver of high cost growth
	growth	• Variability in cost, quality and utilization based upon
	• Variability in cost, quality and utilization based upon diagnosis, treatment type, provider type and/or	diagnosis, treatment type, provider type and/or geographic region
	geographic regionTreatment types subject to a higher potential for	• Treatment types subject to a higher potential for fraud, waste and/or abuse
	fraud, waste and/or abuse	 Projected return on investment and/or savings if
	• Projected return on investment and/or savings if	treatment type is subjected to concurrent care review
	treatment type is subjected to concurrent care review	
		If the benefit or value of conducting concurrent care review
	If the benefit or value of conducting concurrent care	of the treatment type outweighs the administrative costs
	review of the treatment type outweighs the administrative	associated with conducting the review, the treatment type is
	costs associated with conducting the review, the	subject to concurrent care medical necessity review.
	treatment type is subject to concurrent care medical	
Outpatient	necessity review. Outpatient Office Visits, Out-of-Network Subject to	Outpatient Office Visits, Out-of-Network Subject to
Office	Concurrent Care Review: NONE.	Concurrent Care Review: NONE.
Visits, Out-	Cigna does not distinguish between In-Network and Out-	Cigna does not distinguish between In-Network and Out-of-
of-Network	of-Network services for concurrent care review. Office	Network services for concurrent care review. Office Visits
of ficework	Visits are not subject to concurrent review, including -	are not subject to concurrent review, including - Outpatient,
	Outpatient, Out-of-Network: Office Visits	Out-of-Network: Office Visits
All Other	When determining which M/S inpatient benefits are	When determining which M/S inpatient benefits are subject
Outpatient	subject to concurrent care medical necessity review,	to concurrent care medical necessity review, Cigna conducts
Services,	Cigna conducts a cost-benefit analysis based upon the	a cost-benefit analysis based upon the following factors:
Out-of-	following factors:	Cost of treatment/procedure
Network	Cost of treatment/procedure	• Whether treatment type is a driver of high cost growth
	• Whether treatment type is a driver of high cost	• Variability in cost, quality and utilization based upon
	growth	diagnosis, treatment type, provider type and/or
	• Variability in cost, quality and utilization based	geographic region
	upon diagnosis, treatment type, provider type and/or	• Treatment types subject to a higher potential for fraud,
	geographic region	waste and/or abuse

 Treatment types subject to a higher potential for fraud, waste and/or abuse Projected return on investment and/or savings if treatment type is subjected to concurrent care review 	 Projected return on investment and/or savings if treatment type is subjected to concurrent care review Because the benefit or value of conducting concurrent care
Because the benefit or value of conducting concurrent care review of the treatment type outweighs the administrative costs associated with conducting the review, the treatment type is subject to concurrent care medical necessity review.	review of the treatment type outweighs the administrative costs associated with conducting the review, the treatment type is subject to concurrent care medical necessity review.

C. Identify the sources (including any processes, strategies, or evidentiary standards) used to evaluate the factors identified above;

	Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
Inpatient,	Sources	• Industry accepted procedures codes developed by:
In-Network	• Industry accepted procedures codes developed by:	• American Medical Association (AMA)
	• American Medical Association (AMA)	publication of the Current Procedural
	publication of the Current Procedural	Terminology (CPT) book
	Terminology (CPT) book	 American Hospital Association (AHA)
	 American Hospital Association (AHA) 	publication of revenue codes
	publication of revenue codes	 American Formulary Association (AFA)
	 American Formulary Association (AFA) 	publication of codes
	publication of codes	 Centers for Medicare and Medicaid Services
	 Centers for Medicare and Medicaid 	(CMS) publication of codes
	Services (CMS) publication of codes	Internal claims data
	Internal claims data	• UM program operating costs
	 UM program operating costs 	UM authorization data
	UM authorization data	Expert Medical Review of Clinical Criteria
	Expert Medical Review of Clinical Criteria	Nationally recognized evidence-based guidelines
	• Nationally recognized evidence-based guidelines	
Outpatient	Outpatient Office Visits, In Network Subject to	Outpatient Office Visits, In Network Subject to
Office	Concurrent Care Review: NONE.	Concurrent Care Review: NONE.

Visits, In-	Office Visits are not subject to concurrent review,	Office Visits are not subject to concurrent review, including
Network	including - Outpatient, In-Network: Office Visits	- Outpatient, In-Network: Office Visits
All Other Outpatient Services, In-Network	 Industry accepted procedures codes developed by: American Medical Association (AMA) publication of the Current Procedural Terminology (CPT) book American Hospital Association (AHA) publication of revenue codes American Formulary Association (AFA) publication of codes Centers for Medicare and Medicaid Services (CMS) publication of codes Internal claims data UM program operating costs UM authorization data Expert Medical Review 	 Industry accepted procedures codes developed by: American Medical Association (AMA) publication of the Current Procedural Terminology (CPT) book American Hospital Association (AHA) publication of revenue codes American Formulary Association (AFA) publication of codes Centers for Medicare and Medicaid Services (CMS) publication of codes Internal claims data UM program operating costs UM authorization data Expert Medical Review
	Nationally recognized evidence-based guidelines	Nationally recognized evidence-based guidelines
Inpatient, Out-of- Network	 Industry accepted procedures codes developed by: American Medical Association (AMA) publication of the Current Procedural Terminology (CPT) book American Hospital Association (AHA) publication of revenue codes American Formulary Association (AFA) publication of codes Centers for Medicare and Medicaid Services (CMS) publication of codes Internal claims data UM program operating costs UM authorization data Expert Medical Review Nationally recognized evidence-based guidelines 	 Industry accepted procedures codes developed by: American Medical Association (AMA) publication of the Current Procedural Terminology (CPT) book American Hospital Association (AHA) publication of revenue codes American Formulary Association (AFA) publication of codes Centers for Medicare and Medicaid Services (CMS) publication of codes Internal claims data UM program operating costs UM authorization data Expert Medical Review Nationally recognized evidence-based guidelines
Outpatient Office	Outpatient Office Visits, Out-of-Network Subject to Concurrent Care Review: NONE. Cigna does not distinguish between In-Network and Out-	Outpatient Office Visits, Out-of-Network Subject to Concurrent Care Review: NONE.

Visits, Out-	of-Network services for concurrent care review. Office	Cigna does not distinguish between In-Network and Out-of-
of-Network	Visits are not subject to concurrent review, including -	Network services for concurrent care review. Office Visits
	Outpatient, Out-of-Network: Office Visits	are not subject to concurrent review, including - Outpatient,
		Out-of-Network: Office Visits
All Other	• Industry accepted procedures codes developed by:	• Industry accepted procedures codes developed by:
Outpatient	• American Medical Association (AMA)	• American Medical Association (AMA)
Services,	publication of the Current Procedural	publication of the Current Procedural
Out-of-	Terminology (CPT) book	Terminology (CPT) book
Network	• American Hospital Association (AHA)	• American Hospital Association (AHA)
	publication of revenue codes	publication of revenue codes
	• American Formulary Association (AFA)	• American Formulary Association (AFA)
	publication of codes	publication of codes
	 Centers for Medicare and Medicaid 	 Centers for Medicare and Medicaid Services
	Services (CMS) publication of codes	(CMS) publication of codes
	Internal claims data	Internal claims data
	• UM program operating costs	• UM program operating costs
	UM authorization data	UM authorization data
	Expert Medical Review	Expert Medical Review
	Nationally recognized evidence-based guidelines	Nationally recognized evidence-based guidelines

D. Identify the methods and analysis used in the development of the limitation(s); and

	Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
Inpatient,	If the benefit or value of conducting concurrent review of	If the benefit or value of conducting concurrent review of
In-Network	the treatment type outweighs the administrative costs associated with conducting the review, the treatment type is subject to concurrent medical necessity review (prior authorization).	the treatment type outweighs the administrative costs associated with conducting the review, the treatment type is subject to concurrent medical necessity review (prior authorization).
	Clinical Appropriateness is defined as those services that as determined in the exercise of the professional judgement of Cigna's internal medical experts, are in accordance with generally accepted standards of care	Clinical Appropriateness is defined as those services that as determined in the exercise of the professional judgement of Cigna's internal medical experts, are in accordance with generally accepted standards of care and

	and nationally recognized guidelines. Nationally recognized guidelines are included in Cigna's "Levels of Scientific Evidence Table" adapted from the Centre for Evidence Based Medicine, University of Oxford,	nationally recognized guidelines. Nationally recognized guidelines are included in Cigna's "Levels of Scientific Evidence Table" adapted from the Centre for Evidence Based Medicine, University of Oxford, March 2009 as
	March 2009 as outlined in the development of clinical criteria of Medical Necessity.	outlined in the development of clinical criteria of Medical Necessity.
	No M/S inpatient and benefits are subject to fail-first and/or step therapy requirements.	No MH/SUD inpatient benefits are subject to fail-first and/or step therapy requirements.
Outpatient Office	Outpatient Office Visits, In Network Subject to Concurrent Care Review: NONE.	Outpatient Office Visits, In Network Subject to Concurrent Care Review: NONE.
Visits, In- Network	Office Visits are not subject to concurrent review, including - Outpatient, In-Network: Office Visits	Office Visits are not subject to concurrent review, including - Outpatient, In-Network: Office Visits
All Other Outpatient Services, In-Network	If the benefit or value of conducting concurrent review of the treatment type outweighs the administrative costs associated with conducting the review, the treatment type is subject to concurrent medical necessity review (prior authorization).	If the benefit or value of conducting concurrent review of the treatment type outweighs the administrative costs associated with conducting the review, the treatment type is subject to concurrent medical necessity review (prior authorization).
	Clinical Appropriateness is defined as those services that as determined in the exercise of the professional judgement of Cigna's internal medical experts, are in accordance with generally accepted standards of care and nationally recognized guidelines. Nationally recognized guidelines are included in Cigna's "Levels of Scientific Evidence Table" adapted from the Centre for Evidence Based Medicine, University of Oxford, March 2009 as outlined in the development of clinical criteria of Medical Necessity.	Clinical Appropriateness is defined as those services that as determined in the exercise of the professional judgement of Cigna's internal medical experts, are in accordance with generally accepted standards of care and nationally recognized guidelines. Nationally recognized guidelines are included in Cigna's "Levels of Scientific Evidence Table" adapted from the Centre for Evidence Based Medicine, University of Oxford, March 2009 as outlined in the development of clinical criteria of Medical Necessity.
	No medical/surgical outpatient benefits are subject to fail-first and/or step therapy requirements.	No MH/SUD outpatient benefits are subject to fail-first and/or step therapy requirements.

Inpatient,	If the benefit or value of conducting concurrent review of	If the benefit or value of conducting concurrent review of
Out-of-	the treatment type outweighs the administrative costs	the treatment type outweighs the administrative costs
Network	associated with conducting the review, the treatment type	associated with conducting the review, the treatment type is
	is subject to concurrent medical necessity review (prior	subject to concurrent medical necessity review (prior
	authorization).	authorization).
	Clinical Appropriateness is defined as those services	Clinical Appropriateness is defined as those services that as
	that as determined in the exercise of the professional	determined in the exercise of the professional judgement of
	judgement of Cigna's internal medical experts, are in	Cigna's internal medical experts, are in accordance with
	accordance with generally accepted standards of care	generally accepted standards of care and nationally
	and nationally recognized guidelines. Nationally recognized guidelines are included in Cigna's "Levels	recognized guidelines. Nationally recognized guidelines are included in Cigna's "Levels of Scientific Evidence Table"
	of Scientific Evidence Table" adapted from the Centre	adapted from the Centre for Evidence Based Medicine,
	for Evidence Based Medicine, University of Oxford,	University of Oxford, March 2009 as outlined in the
	March 2009 as outlined in the development of clinical	development of clinical criteria of Medical Necessity.
	criteria of Medical Necessity.	
	No M/S inpatient and benefits are subject to fail-first	
	and/or step therapy requirements.	
Outpatient	Outpatient Office Visits, Out-of-Network Subject to	Outpatient Office Visits, Out-of-Network Subject to
Office	Concurrent Care Review: NONE.	Concurrent Care Review: NONE.
Visits, Out-	Cigna does not distinguish between In-Network and Out-	Cigna does not distinguish between In-Network and Out-of-
of-Network	of-Network services for concurrent care review. Office	Network services for concurrent care review. Office Visits
	Visits are not subject to concurrent review, including -	are not subject to concurrent review, including - Outpatient,
	Outpatient, Out-of-Network: Office Visits	Out-of-Network: Office Visits
All Other	If the benefit or value of conducting concurrent review of	If the benefit or value of conducting concurrent review of
Outpatient Services,	the treatment type outweighs the administrative costs associated with conducting the review, the treatment type	the treatment type outweighs the administrative costs associated with conducting the review, the treatment type is
Out-of-	is subject to concurrent medical necessity review (prior	subject to concurrent medical necessity review (prior
Network	authorization).	authorization).
	Clinical Appropriateness is defined as those services	Clinical Appropriateness is defined as those services that
	that as determined in the exercise of the professional	as determined in the exercise of the professional
	judgement of Cigna's internal medical experts, are in	judgement of Cigna's internal medical experts, are in
	accordance with generally accepted standards of care	accordance with generally accepted standards of care and
	accordance mai generary accepted standards of eare	accordance mail generally accepted standards of eare and

and nationally recognized guidelines. Nationally recognized guidelines are included in Cigna's "Levels of Scientific Evidence Table" adapted from the Centre for Evidence Based Medicine, University of Oxford, March 2009 as outlined in the development of clinical criteria of Medical Necessity.	nationally recognized guidelines. Nationally recognized guidelines are included in Cigna's "Levels of Scientific Evidence Table" adapted from the Centre for Evidence Based Medicine, University of Oxford, March 2009 as outlined in the development of clinical criteria of Medical Necessity.
No M/S outpatient benefits are subject to fail-first and/or step therapy requirements.	No MH/SUD outpatient benefits are subject to fail-first and/or step therapy requirements.

E. Provide any evidence and documentation to establish that the limitation(s) is applied no more stringently, as written and in operation, to mental health and substance use disorder benefits than to medical and surgical benefits.

Inpatient, In-Network	Cigna applies the concurrent care review NQTL consistently to M/S benefits and MH/SUD benefits. In both M/S and MH/SUD services, concurrent care reviews are typically initiated by a nurse reviewer for M/S benefits or Care Manager (licensed behavioral health clinician) for MH/SUD benefits telephonically a day or two before the last covered/authorized day.	
	An "in operation" review of Cigna's application of the Concurrent Review NQTL, specifically approvals and denial information, in the "Inpatient, In-Network" classification revealed no statistically significant discrepancies in medical necessity denial rates as-between MH/SUD and M/S benefits. While operational outcomes are not determinative of NQTL compliance, and an insurer may comply with the NQTL requirement notwithstanding a disparate outcome for an NQTL applied to MH/SUD benefits as compared to M/S benefits, comparable outcomes can help evidence compliance with the in-operation component of the NQTL requirement. Consequently, Cigna concludes that the NQTL was applied comparably and no more stringently to MH/SUD benefits than to M/S benefits.	
	A review of concurrent review appeals data reveals comparable upheld and overturn rates and, on average, lower overturn rates for MH/SUD benefits in the out of-network outpatient and inpatient classifications. Specifically, an analysis of the total out-of-network appeal overturn rate as-between inpatient MH/SUD and M/S services includes a 9 percent lower denial rate (about 30% to about 39%) for MH/SUD services concurrent review appeals for Out of Network, Out Patient, and nearly identical appeal overturn rates (about 23% as-compared to about 27%) for MH/SUD and M/S services appeals to a concurrent review determination.	

	Cigna's methodology for determining which medical/surgical services and which MH/SUD services within a classification of benefits are subject to concurrent care review as written and in operation, as well as its concurrent care medical necessity review processes applied to medical/surgical services and for MH/SUD services as written and in operation reflect they are comparable and no more stringent for MH/SUD services within a classification of benefits than for medical/surgical services within the same classification of benefits.
Outpatient Office Visits, In- Network	Outpatient, In-Network, Office Visits for M/S and MH/SUD benefits do not require concurrent review. Because the concurrent review NQTL does not apply to MH/SUD benefits, no further analysis of compliance with the NQTL requirement is warranted.
All Other Outpatient Services, In-Network	Cigna applies the concurrent care review NQTL consistently to M/S benefits and MH/SUD benefits. In both M/S and MH/SUD services, concurrent care reviews are typically initiated by a nurse reviewer for M/S benefits or Care Manager (licensed behavioral health clinician) for MH/SUD benefits telephonically a day or two before the last covered/authorized day.
	Coverage determinations of M/S services and MH/SUD services are made in accordance with evidence-based treatment guidelines by physician peer reviewers licensed in the same or similar specialty area as the treating provider. Moreover, Cigna's methodology for determining which MH/SUD services within a classification of benefits are subject to concurrent care review is comparable to, and applied no more stringently than, its methodology for determining which medical/surgical services within the same classification of benefits are subject to concurrent care review.
	An "in operation" review of Cigna's application of the Concurrent Review NQTL, specifically approvals and denial information, in the "Outpatient, In-Network, Other Items and Services" classification revealed no statistically significant discrepancies in denial rates as-between MH/SUD and M/S benefits. While operational outcomes are not determinative of NQTL compliance, and an insurer may comply with the NQTL requirement notwithstanding a disparate outcome for an NQTL applied to MH/SUD benefits as compared to M/S benefits, comparable outcomes can help evidence compliance with the in-operation component of the NQTL requirement. Consequently, Cigna concludes that the NQTL was applied comparably and no more stringently to MH/SUD benefits than to M/S benefits.
	A review of concurrent review appeals data reveals comparable upheld and overturn rates and, on average, lower overturn rates for MH/SUD benefits in the out of-network outpatient and inpatient classifications. Specifically, an analysis of the total out-of-network appeal overturn rate as-between inpatient MH/SUD and M/S services includes a 9 percent lower denial rate (about 30% to about 39%) for MH/SUD services concurrent review appeals for Out of Network, Out Patient, and nearly identical appeal overturn rates (about 23% as-compared to about 27%) for MH/SUD and M/S services appeals to a concurrent review determination.

	Cigna's methodology for determining which medical/surgical services and which MH/SUD services within a	
	classification of benefits are subject to concurrent care review as written and in operation, as well as its concurrent care	
	medical necessity review processes applied to medical/surgical services and for MH/SUD services as written and in	
	operation reflect they are comparable and no more stringent for MH/SUD services within a classification of benefits than for medical/surgical services within the same classification of benefits.	
Inpatient,	Cigna applies the concurrent care review NQTL consistently to M/S benefits and MH/SUD benefits. In both M/S and	
Out-of- Network	MH/SUD services, concurrent care reviews are typically initiated by a nurse reviewer for M/S benefits or Care Manager (licensed behavioral health clinician) for MH/SUD benefits telephonically a day or two before the last covered/authorized day.	
	UM coverage determinations of both M/S and MH/SUD services are made in accordance with evidence-based treatment guidelines by physician peer reviewers licensed in the same or similar specialty area as the treating provider. Moreover, Cigna's methodology for determining which MH/SUD services within a classification of benefits are subject to concurrent care review is comparable to, and applied no more stringently than, its methodology for determining which medical/surgical services within the same classification of benefits are subject to concurrent care review.	
	An "in operation" review of Cigna's application of the Concurrent Review NQTL, specifically approvals and denial information, in the "Inpatient, Out-of-Network, Other Items and Services" classification revealed no statistically significant discrepancies in denial rates as-between MH/SUD and M/S benefits. While operational outcomes are not determinative of NQTL compliance, and an insurer may comply with the NQTL requirement notwithstanding a disparate outcome for an NQTL applied to MH/SUD benefits as compared to M/S benefits, comparable outcomes can help evidence compliance with the in-operation component of the NQTL requirement. Consequently, Cigna concludes that the NQTL was applied comparably and no more stringently to MH/SUD benefits than to M/S benefits.	
	Cigna's methodology for determining which medical/surgical services and which MH/SUD services within a classification of benefits are subject to concurrent care review as written and in operation, as well as its concurrent care medical necessity review processes applied to medical/surgical services and for MH/SUD services as written and in operation reflect they are comparable and no more stringent for MH/SUD services within a classification of benefits than for medical/surgical services within the same classification of benefits.	
Outpatient	Outpatient, Out-of-Network office visits for M/S and MH/SUD benefits do not require concurrent review. Because the	
Office	concurrent review NQTL does not apply to MH/SUD benefits, no further analysis of compliance with the NQTL	
Visits, Out-	requirement is warranted.	
of-Network		
All Other	Cigna applies the concurrent care review NQTL consistently to M/S benefits and MH/SUD Benefits.	
Outpatient		

Services, Out-of- Network	based treatment guidelines by physician peer reviewers licensed in the same or similar specialty area as the treating	
	An "in operation" review of Cigna's application of the Concurrent Review NQTL, specifically approvals and denial information, in the "Outpatient, Out-of-Network, Other Items and Services" classification revealed no statistically significant discrepancies in denial rates as-between MH/SUD and M/S benefits. While operational outcomes are not determinative of NQTL compliance, and an insurer may comply with the NQTL requirement notwithstanding a disparate outcome for an NQTL applied to MH/SUD benefits as compared to M/S benefits, comparable outcomes can help evidence compliance with the in-operation component of the NQTL requirement.	
	Cigna's methodology for determining which M/S and MH/SUD services within a classification of benefits are subject to concurrent care review as written and in operation, as well as its concurrent care medical necessity review processes applied to M/S and MH/SUD services, as written and in operation reflect they are comparable and no more stringent for MH/SUD services within a classification of benefits than for M/S services within the same classification of benefits (All Other Outpatient).	

4. <u>Retrospective Review Process</u>

Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
Retrospective Medical Necessity Review is available for all M/S	Retrospective Medical Necessity Review is available for all
In-Patient, In-Network, Inpatient Out-of-Network, All Other	MH/SUD In-Patient, In-Network, Inpatient Out-of-Network, All
Outpatient In-Network and All Other Outpatient Out-of-Network	Other Outpatient In-Network and All Other Outpatient Out-of-
services upon request of the enrollee <i>if</i> prior authorization was	Network services upon request of the enrollee <i>if</i> prior
required and not obtained via the pre-service or concurrent care	authorization was required and not obtained via the pre-service or
review process.	concurrent care review process.

Enrollees must meet timely filing requirements and have up to 365	Enrollees must meet timely filing requirements and have up to 365
from the date of services to request Retrospective review.	from the date of services to request Retrospective review.
Process	Process
Enrollees may request a retrospective medical necessity review by submitting the request in writing with the supporting medical records electronically or by fax or mail. The request for retrospective review and supporting clinical information are referred to a nurse reviewer for review. If the nurse reviewer determines the enrollee met criteria for the services at issue, he/she authorizes the services at issue. If the nurse reviewer assesses the participant did not appear to meet medical necessity criteria for services at issue, he/she refers the case to a peer reviewer (e.g. Medical Director) for determination.	Enrollees may request a retrospective medical necessity review by submitting the request in writing with the supporting medical records electronically or by fax or mail. The request for retrospective review and supporting clinical information are referred to a nurse reviewer for review. If the nurse reviewer determines the enrollee met criteria for the services at issue, he/she authorizes the services at issue. If the nurse reviewer assesses the participant did not appear to meet medical necessity criteria for services at issue, he/she refers the case to a peer reviewer (e.g. Medical Director) for determination.
If the medical records support the participant met medical	If the medical records support the participant met medical
necessity criteria for the in-network or out-of-network services at	necessity criteria for the in-network or out-of-network services at
issue, the services would be authorized. If the medical records do	issue, the services would be authorized. If the medical records do
not support the enrollee met medical necessity criteria for the in-	not support the enrollee met medical necessity criteria for the in-
network or out-of-network services at issue, the services would be	network or out-of-network services at issue, the services would be
denied as not medically necessary. For denials of in-network	denied as not medically necessary. For denials of in-network
services, participating providers are contractually obligated to hold	services, participating providers are contractually obligated to hold
the enrollee harmless for the services at issue. For denials of out-	the enrollee harmless for the services at issue. For denials of out-
of-network services, the enrollee would have the right to pursue	of-network services, the enrollee would have the right to pursue
the full internal and/or external appeal process.	the full internal and/or external appeal process.

B. Identify the factors used in the development of the limitation(s);

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
The factors used to determine that retroactive review NQTL will	The factors used to determine that retroactive review NQTL will
apply to M/S benefit is whether the prior authorization of the M/S	apply to MH/SUD benefit is whether the prior
services were obtained via the pre-service or concurrent care	authorization/precertification of the MH/SUD services were
review process and an enrollee has requested such review.	

obtained via the pre-service or concurrent care review process and
an enrollee has requested such review.

C. Identify the sources (including any processes, strategies, or evidentiary standards) used to evaluate the factors identified above;

Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
Enrollee Medical Records and Plan Documents	Medical Records and Plan Documents
Clinical Criteria/Medical Necessity	Clinical Criteria/Medical Necessity

D. Identify the methods and analysis used in the development of the limitation(s); and

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
In determining whether health care services, supplies, or	In determining whether health care services, supplies, or
medications are Medically Necessary, all elements of Medical	medications are Medically Necessary, all elements of Medical
Necessity must be met as specifically outlined in the individual's	Necessity must be met as specifically outlined in the individual's
benefit plan documents, the Medical Director or Review	benefit plan documents, the Medical Director or Review
Organization may rely on the clinical coverage policies	Organization may rely on the clinical coverage policies
maintained by Cigna or the Review Organization.	maintained by Cigna or the Review Organization.

E. Provide any evidence and documentation to establish that the limitation(s) is applied no more stringently, as written and in operation, to mental health and substance use disorder benefits than to medical and surgical benefits.

Retrospective Medical Necessity Review is a process, strategy or evidentiary standard designed to limit the scope or duration of benefits for services provided under an enrollee benefit plan. Retrospective Medical Necessity Review is available for both M/S and MH/SUD In-Patient, In-Network, Inpatient Out-of-Network, All Other Outpatient In-Network and All Other Outpatient Out-of-Network services upon request of the enrollee *if* prior authorization was not obtained via the pre-service or concurrent care review process.

UM coverage determinations of M/S services and MH/SUD services use the same processes, strategies, and evidentiary standards and are made in accordance with evidence-based treatment guidelines by physician peer reviewers licensed in the same or similar specialty area as the treating provider.

Moreover, Cigna's methodology for determining which MH/SUD services within a classification of benefits are subject to retrospective review is comparable to, and applied no more stringently than, its methodology for determining which medical/surgical services within the same classification of benefits are subject to retrospective review.

An "in operation" book of business review of Cigna's application of the Retrospective Review NQTL, specifically approvals and denial information, in the "Inpatient, In-Network" classification revealed no statistically significant discrepancies in denial rates as-between MH/SUD and M/S benefits. Likewise, the in operation review of Cigna's application of the Retrospective Review NQTL, specifically approvals and denial information, in the "Inpatient, Out-of-Network" classification revealed no statistically significant discrepancies in denial rates as-between MH/SUD and M/S benefits.

An in operation review of Cigna's application of the Retrospective Review NQTL, specifically approvals and denial information, in the "Outpatient In-Network" and Outpatient Out-of-Network classifications revealed higher denial rates for M/S benefits than for MH/SUD benefits across all determinations including coverage denial, denied as not medical necessary and denied as experimental, investigational or unproven.

When reviewing the average number of days approved upon retrospective review for inpatient services, the approval times were nearly identical with 7 days approved for MH/SUD services and 7.2 days approved for M/S services.

Lastly, a review of Level 1 appeals data revealed near identical rates of appeals denial, determinations upheld with MH/SUD reflecting 77.22% upheld and M/S reflecting 74.68% for Inpatient, In-Network, 79.32% and 85.70% respectively for Inpatient Out-of-Network; 63.16% and 72.29% for In-Network, Outpatient and 77.97% and 82.76% for Outpatient Out-of-Network.

While operational outcomes are not determinative of NQTL compliance, and an insurer may comply with the NQTL requirement notwithstanding a disparate outcome for an NQTL applied to MH/SUD benefits as compared to M/S benefits, comparable outcomes can help evidence compliance with the in-operation component of the NQTL requirement. Consequently, Cigna concludes that the NQTL was applied comparably and no more stringently to MH/SUD benefits than to M/S benefits.

Cigna's methodology for determining which medical/surgical services and which MH/SUD services within a classification of benefits are subject to retrospective review as written and in operation, as well as its retrospective review processes applied to M/S services and for MH/SUD services as written and in operation reflect they are comparable and no more stringent for MH/SUD services within a classification of benefits than for M/S services within the same classification of benefits

5. <u>Emergency Services</u>

A. Provide the specific plan language for each NQTL in the above defined category and identify the medical/surgical and mental health and/or substance use disorder benefits to which it applies;

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Emergency Medical Condition	Emergency Medical Condition
Emergency medical condition means a medical condition which	Emergency medical condition means a medical condition which
manifests itself by acute symptoms of sufficient severity	manifests itself by acute symptoms of sufficient severity
(including severe pain) such that a prudent layperson, who	(including severe pain) such that a prudent layperson, who
possesses an average knowledge of health and medicine, could	possesses an average knowledge of health and medicine, could
reasonably expect the absence of immediate medical attention to	reasonably expect the absence of immediate medical attention to
result in placing the health of the individual (or, with respect to a	result in placing the health of the individual (or, with respect to a
pregnant woman, the health of the woman or her unborn child) in	pregnant woman, the health of the woman or her unborn child) in
serious jeopardy; serious impairment to bodily functions; or	serious jeopardy; serious impairment to bodily functions; or
serious dysfunction of any bodily organ or part.	serious dysfunction of any bodily organ or part.
Emergency Services	Emergency Services
Emergency services means, with respect to an Emergency Medical	Emergency services means, with respect to an Emergency Medical
Condition, a medical screening examination that is within the	Condition, a medical screening examination that is within the
capability of the emergency department of a Hospital, including	capability of the emergency department of a Hospital, including
ancillary services routinely available to the emergency department	ancillary services routinely available to the emergency department
to evaluate the Emergency Medical Condition; or a health care	to evaluate the Emergency Medical Condition; or a health care
item or service furnished or required to evaluate and treat the	item or service furnished or required to evaluate and treat the
Emergency Medical Condition; and such further medical	Emergency Medical Condition; and such further medical
examination and treatment, to the extent they are within the	examination and treatment, to the extent they are within the
capabilities of the staff and facilities available at the Hospital, to	capabilities of the staff and facilities available at the Hospital, to
Stabilize the patient.	Stabilize the patient.
In an emergency situation, you should call 911 for Maryland or	In an emergency situation, you should call 911 for Maryland or
other state, county, or local emergency medical services.	other state, county, or local emergency medical services.
Pre-authorization for this service is not required.	Pre-authorization for this service is not required.

B. Identify the factors used in the development of the limitation(s);

Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
Emergency medical/surgical services are not subject to prior authorization.	Emergency MH/SUD services are not subject to prior authorization.
Emergency services that are furnished by a provider qualified to provide emergency services to evaluate and stabilize an emergency medical condition, including ambulance services, are assigned to the emergency care classification of benefits. An emergency medical condition exists when a medical condition manifests itself by acute symptoms of sufficient severity (including severe pain) such that a prudent layperson, with an average knowledge of health and medicine, could reasonably expect the absence of immediate medical attention to result in:	Emergency services that are furnished by a provider qualified to provide emergency services to evaluate and stabilize an emergency medical condition, including ambulance services, are assigned to the emergency care classification of benefits. An emergency medical condition exists when a medical condition manifests itself by acute symptoms of sufficient severity (including severe pain) such that a prudent layperson, with an average knowledge of health and medicine, could reasonably expect the absence of immediate medical attention to result in:
• Serious jeopardy to the health of the individual, or in the case of a pregnant woman, the health of the woman or her unborn child;	• Serious jeopardy to the health of the individual, or in the case of a pregnant woman, the health of the woman or her unborn child;
• Serious impairment to bodily function; or	• Serious impairment to bodily function; or
• Serious dysfunction of any bodily organ or part.	• Serious dysfunction of any bodily organ or part.

C. Identify the sources (including any processes, strategies, or evidentiary standards) used to evaluate the factors identified above;

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Emergency medical/surgical services are not subject to prior authorization.	Emergency MH/SUD services are not subject to prior authorization.
Emergency services that are furnished by a provider qualified to	Emergency services that are furnished by a provider qualified to
provide emergency services to evaluate and stabilize an	provide emergency services to evaluate and stabilize an
emergency medical condition, including ambulance services, are	emergency medical condition, including ambulance services, are
assigned to the emergency care classification of benefits. An	assigned to the emergency care classification of benefits. An
emergency medical condition exists when a medical condition	emergency medical condition exists when a medical condition

manifests itself by acute symptoms of sufficient severity	manifests itself by acute symptoms of sufficient severity
(including severe pain) such that a prudent layperson, with an	(including severe pain) such that a prudent layperson, with an
average knowledge of health and medicine, could reasonably	average knowledge of health and medicine, could reasonably
expect the absence of immediate medical attention to result in:	expect the absence of immediate medical attention to result in:
• Serious jeopardy to the health of the individual, or in the case of a pregnant woman, the health of the woman or her unborn child;	• Serious jeopardy to the health of the individual, or in the case of a pregnant woman, the health of the woman or her unborn child;
• Serious impairment to bodily function; or	• Serious impairment to bodily function; or
• Serious dysfunction of any bodily organ or part.	• Serious dysfunction of any bodily organ or part.

D. Identify the methods and analysis used in the development of the limitation(s); and

Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
Emergency medical/surgical services are not subject to prior authorization.	Emergency MH/SUD services are not subject to prior authorization.
Emergency services that are furnished by a provider qualified to provide emergency services to evaluate and stabilize an emergency medical condition, including ambulance services, are assigned to the emergency care classification of benefits. An emergency medical condition exists when a medical condition manifests itself by acute symptoms of sufficient severity (including severe pain) such that a prudent layperson, with an average knowledge of health and medicine, could reasonably expect the absence of immediate medical attention to result in:	Emergency services that are furnished by a provider qualified to provide emergency services to evaluate and stabilize an emergency medical condition, including ambulance services, are assigned to the emergency care classification of benefits. An emergency medical condition exists when a medical condition manifests itself by acute symptoms of sufficient severity (including severe pain) such that a prudent layperson, with an average knowledge of health and medicine, could reasonably expect the absence of immediate medical attention to result in:
• Serious jeopardy to the health of the individual, or in the case of a pregnant woman, the health of the woman or her unborn child;	• Serious jeopardy to the health of the individual, or in the case of a pregnant woman, the health of the woman or her unborn child;
• Serious impairment to bodily function; or	• Serious impairment to bodily function; or
• Serious dysfunction of any bodily organ or part.	• Serious dysfunction of any bodily organ or part.

E. Provide any evidence and documentation to establish that the limitation(s) is applied no more stringently, as written and in operation, to mental health and substance use disorder benefits than to medical and surgical benefits.

Cigna's integrated medical and behavioral health plans have only one, single benefit for emergency room and urgent care. Accordingly, there are no differences between how coverage for M/S and MH/SUD emergency room and urgent care services.

6. Pharmacy Services

A. Provide the specific plan language for each NQTL in the above defined category and identify the medical/surgical and mental health and/or substance use disorder benefits to which it applies;

Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
Prior Authorization Requirements	Prior Authorization Requirements
Coverage for certain Prescription Drug Products prescribed to you	Coverage for certain Prescription Drug Products prescribed to
requires your Physician to obtain prior authorization from Cigna or	you requires your Physician to obtain prior authorization from
its Review Organization. The reason for obtaining prior	Cigna or its Review Organization. The reason for obtaining prior
authorization from Cigna is to determine whether the Prescription	authorization from Cigna is to determine whether the Prescription
Drug Product is Medically Necessary in accordance with Cigna's	Drug Product is Medically Necessary in accordance with Cigna's
coverage criteria. Coverage criteria for a Prescription Drug Product	coverage criteria. Coverage criteria for a Prescription Drug
may vary based on the clinical use for which the Prescription Order	Product may vary based on the clinical use for which the
or Refill is submitted, and may change periodically based on	Prescription Order or Refill is submitted, and may change
changes in, without limitation, clinical guidelines or practice	periodically based on changes in, without limitation, clinical
standards, or market factors.	guidelines or practice standards, or market factors.
If Cigna or its Review Organization reviews the documentation	If Cigna or its Review Organization reviews the documentation
provided and determines that the Prescription Drug Product is not	provided and determines that the Prescription Drug Product is not
Medically Necessary or otherwise excluded, your plan will not	Medically Necessary or otherwise excluded, your plan will not
cover the Prescription Drug Product. Cigna, or its Review	cover the Prescription Drug Product. Cigna, or its Review
Organization, will not review claims for excluded Prescription	Organization, will not review claims for excluded Prescription
Drug Products or other services to determine if they are Medically	Drug Products or other services to determine if they are
Necessary, unless required by law.	Medically Necessary, unless required by law.

When Prescription Drug Products that require prior authorization are dispensed at a Pharmacy, you or your prescribing Physician are responsible for obtaining prior authorization from Cigna. If you do not obtain prior authorization from us before the Prescription Drug Product is dispensed by the Pharmacy, you can ask us to consider reimbursement after you pay for and receive the Prescription Drug Product. You will need to pay for the Prescription Drug Product at the Pharmacy prior to submitting a reimbursement request.

When you submit a claim on this basis, you will need to submit a paper claim using the form that appears on the website shown on your ID card.

If a prior authorization request is approved, your Physician will receive confirmation. The authorization will be processed in the claim system to allow you to have coverage for the Prescription Drug Product. The length of the authorization may depend on the diagnosis and the Prescription Drug Product. The authorization will at all times be subject to the plan's terms of coverage for the Prescription Drug Product, which may change from time to time. When your Physician advises you that coverage for the Prescription Drug Product has been approved, you can contact a Pharmacy to fill the covered Prescription Order or Refill.

If the prior authorization request is denied, your Physician and you will be notified that coverage for the Prescription Drug Product is not authorized. If you disagree with a coverage decision, you may appeal that decision in accordance with the provisions of the plan by submitting a written request stating why the Prescription Drug Product should be covered.

When Prescription Drug Products that require prior authorization are dispensed at a Pharmacy, you or your prescribing Physician are responsible for obtaining prior authorization from Cigna. If you do not obtain prior authorization from us before the Prescription Drug Product is dispensed by the Pharmacy, you can ask us to consider reimbursement after you pay for and receive the Prescription Drug Product. You will need to pay for the Prescription Drug Product at the Pharmacy prior to submitting a reimbursement request.

When you submit a claim on this basis, you will need to submit a paper claim using the form that appears on the website shown on your ID card.

If a prior authorization request is approved, your Physician will receive confirmation. The authorization will be processed in the claim system to allow you to have coverage for the Prescription Drug Product. The length of the authorization may depend on the diagnosis and the Prescription Drug Product. The authorization will at all times be subject to the plan's terms of coverage for the Prescription Drug Product, which may change from time to time. When your Physician advises you that coverage for the Prescription Drug Product has been approved, you can contact a Pharmacy to fill the covered Prescription Order or Refill. If the prior authorization request is denied, your Physician and you will be notified that coverage for the Prescription Drug Product is not authorized. If you disagree with a coverage decision, you may appeal that decision in accordance with the provisions of the plan by submitting a written request stating why the Prescription Drug Product should be covered.

B. Identify the factors used in the development of the limitation(s);

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
When deciding whether to place a drug on a three-tiered formulary,	When deciding whether to place a drug on a three-tiered
and, if so, on which formulary tier, the formulary committee	formulary, and, if so, on which formulary tier, the formulary
considers the following factors: the brand or generic status of a	committee considers the following factors: the brand or generic
drug; whether, as applicable, a brand drug has available generic	status of a drug; whether, as applicable, a brand drug has
alternatives; whether the drug is the lowest net cost drug as	available generic alternatives; whether the drug is the lowest net
compared to therapeutic alternatives; and whether a rebate	cost drug as compared to therapeutic alternatives; and whether a
arrangement exists for the drug to offset its cost.	rebate arrangement exists for the drug to offset its cost.
The source for the brand or generic status factor is a publication of	The source for the brand or generic status factor is a publication
drug indicators available from an external vendor (First DataBank).	of drug indicators available from an external vendor (First
The sources for whether a drug has available generic alternatives	DataBank). The sources for whether a drug has available generic
are available drug indicators from First DataBank and other	alternatives are available drug indicators from First DataBank
external information about other drugs available in the same	and other external information about other drugs available in the
therapeutic class. The sources for whether the drug is the lowest	same therapeutic class. The sources for whether the drug is the
net cost drug as compared to therapeutic alternatives is internal	lowest net cost drug as compared to therapeutic alternatives is
drug claims utilization information. The source for whether a	internal drug claims utilization information. The source for
rebate arrangement exists for the drug to offset its cost is rebate	whether a rebate arrangement exists for the drug to offset its cost
contract or billing information.	is rebate contract or billing information.
The factors considered in deciding to apply a prior authorization	The factors considered in deciding to apply a prior authorization
requirement, including a quantity limit, to a drug include the risk of	requirement, including a quantity limit, to a drug include the risk
adverse safety issues, cost, or risk of inappropriate (i.e., wasteful)	of adverse safety issues, cost, or risk of inappropriate (i.e.,
utilization. The evidentiary standard used to define whether a drug	wasteful) utilization. The evidentiary standard used to define
poses an adverse safety issue is the assessment by clinical experts	whether a drug poses an adverse safety issue is the assessment by
of available clinical evidence, including, without limitation, FDA	clinical experts of available clinical evidence, including, without
labeling, clinical guidelines or clinical literature. This evidence is	limitation, FDA labeling, clinical guidelines or clinical literature.
reviewed in its totality by relevant experts, though certain attributes	This evidence is reviewed in its totality by relevant experts,
such as the status of a drug as a controlled substance will, if	though certain attributes such as the status of a drug as a
present, result in application or a prior authorization requirement on	controlled substance will, if present, result in application or a
the basis of potentially serious adverse safety impacts to enrollees.	prior authorization requirement on the basis of potentially serious
Controlled substances subject to prior authorization or a quantity	adverse safety impacts to enrollees. Controlled substances
limit include ADHD stimulants, which are MH/SUD benefits, and	subject to prior authorization or a quantity limit include ADHD
other controlled substances used to treat Med/Surg conditions like	stimulants, which are MH/SUD benefits, and other controlled

opioids for pain management. For other drugs, the FDA's product	substances used to treat Med/Surg conditions like opioids for
label generally indicates whether a serious adverse safety risk exists	pain management. For other drugs, the FDA's product label
for a drug, though sometimes, such as with opioids, other widely-	generally indicates whether a serious adverse safety risk exists
accepted clinical guidelines such as CDC guidance may also dictate	for a drug, though sometimes, such as with opioids, other widely-
whether a prior authorization requirement will apply.	accepted clinical guidelines such as CDC guidance may also
	dictate whether a prior authorization requirement will apply.

C. Identify the sources (including any processes, strategies, or evidentiary standards) used to evaluate the factors identified above;

Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
The source for the brand or generic status factor is a publication of	The source for the brand or generic status factor is a publication
drug indicators available from an external vendor (First DataBank).	of drug indicators available from an external vendor (First
The sources for whether a drug has available generic alternatives	DataBank). The sources for whether a drug has available generic
are available drug indicators from First DataBank and other	alternatives are available drug indicators from First DataBank
external information about other drugs available in the same	and other external information about other drugs available in the
therapeutic class. The sources for whether the drug is the lowest	same therapeutic class. The sources for whether the drug is the
net cost drug as compared to therapeutic alternatives is internal	lowest net cost drug as compared to therapeutic alternatives is
drug claims utilization information. The source for whether a	internal drug claims utilization information. The source for
rebate arrangement exists for the drug to offset its cost is rebate	whether a rebate arrangement exists for the drug to offset its cost
contract or billing information.	is rebate contract or billing information.

D. Identify the methods and analysis used in the development of the limitation(s); and

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
The processes, factors, and standards are used to determine	The processes, factors, and standards are used to determine
formulary placement to an MH/SUD or M/S drug are identical. The	formulary placement to an MH/SUD or M/S drug are identical.
same formulary committee structure makes decisions with respect	The same formulary committee structure makes decisions with
to MH/SUD or M/S drugs ensures appropriate expertise across	respect to MH/SUD or M/S drugs ensures appropriate expertise
MH/SUD and M/S treatment. Two Cigna committees perform	across MH/SUD and M/S treatment. Two Cigna committees
different, but interrelated, functions when designing utilization	perform different, but interrelated, functions when designing
management requirements like quantity limits: the Cigna Pharmacy	utilization management requirements like quantity limits: the
& Therapeutics Committee ("P&T Committee"); and, the Cigna	Cigna Pharmacy & Therapeutics Committee ("P&T
Value Assessment Committee. Cigna uses one, combined set of	Committee"); and, the Cigna Value Assessment Committee.
policies to govern its formulary management practices across M/S	Cigna uses one, combined set of policies to govern its formulary

and MH/SUD drugs, and, while uniformity in processes is not required by the NQTL requirements (only comparability), and uniformity in processes for designing and applying an NQTL can evidence comparability in the NQTL as-written.

The P&T Committee is composed of voting external clinicians across a number of specialties that perform, among other responsibilities, clinical reviews of drugs to determine whether a drug must be covered on the formulary as a clinical matter. The P&T Committee includes among its voting members a psychiatrist to help ensure that, like other medical specialties, appropriate expertise in MH/SUD treatment is represented when reviewing the clinical safety/efficacy of drugs that may be considered MH/SUD benefits. By including a psychiatrist on the clinical P&T committee, Cigna ensures that comparable clinical expertise in treating MH/SUD conditions and M/S conditions is represented in the formulary decision-making process. While physicians, regardless of specialty, may be able to review the clinical safety/efficacy profile of an MH/SUD drug just as readily as M/S drugs used to treat conditions that the physician may not specialize in treating, Cigna acknowledges the benefits to its formulary management process of including MH/SUD expertise on the clinical P&T Committee. In the context of NQTL compliance, the inclusion of a physician with appropriate MH/SUD treatment expertise on the clinical P&T Committee that assigns clinical designations to M/S and MH/SUD drugs evidences the comparability of the process by which formulary management decisions are made, in writing and in operation, across M/S and MH/SUD prescription drug benefits. Relatedly, it also helps to ensure for MH/SUD drugs the appropriate consideration of the factors and standards that inform Cigna's formulary management decisions.

In rendering clinical findings on drugs, the P&T Committee assesses the FDA labeling and, as appropriate and available, clinical practice standards/trends and documentation like clinical literature and guidelines. The Value Assessment Committee is management practices across M/S and MH/SUD drugs, and, while uniformity in processes is not required by the NQTL requirements (only comparability), and uniformity in processes for designing and applying an NQTL can evidence comparability in the NQTL as-written.

The P&T Committee is composed of voting external clinicians across a number of specialties that perform, among other responsibilities, clinical reviews of drugs to determine whether a drug must be covered on the formulary as a clinical matter. The P&T Committee includes among its voting members a psychiatrist to help ensure that, like other medical specialties, appropriate expertise in MH/SUD treatment is represented when reviewing the clinical safety/efficacy of drugs that may be considered MH/SUD benefits. By including a psychiatrist on the clinical P&T committee, Cigna ensures that comparable clinical expertise in treating MH/SUD conditions and M/S conditions is represented in the formulary decision-making process. While physicians, regardless of specialty, may be able to review the clinical safety/efficacy profile of an MH/SUD drug just as readily as M/S drugs used to treat conditions that the physician may not specialize in treating, Cigna acknowledges the benefits to its formulary management process of including MH/SUD expertise on the clinical P&T Committee. In the context of NQTL compliance, the inclusion of a physician with appropriate MH/SUD treatment expertise on the clinical P&T Committee that assigns clinical designations to M/S and MH/SUD drugs evidences the comparability of the process by which formulary management decisions are made, in writing and in operation, across M/S and MH/SUD prescription drug benefits. Relatedly, it also helps to ensure for MH/SUD drugs the appropriate consideration of the factors and standards that inform Cigna's formulary management decisions.

In rendering clinical findings on drugs, the P&T Committee assesses the FDA labeling and, as appropriate and available, clinical practice standards/trends and documentation like clinical

composed of representatives representing several functional areas	literature and guidelines. The Value Assessment Committee is
of the combined company, including, for example, clinicians and	composed of representatives representing several functional areas
representatives from Cigna's finance areas, that have experience	of the combined company, including, for example, clinicians and
with formulary management or PBM/health plan operations, and is	representatives from Cigna's finance areas, that have experience
responsible for deciding - within the clinical parameters established	with formulary management or PBM/health plan operations, and
by the P&T Committee - which drugs will be covered on the	is responsible for deciding - within the clinical parameters
formularies offered by Cigna to plans and whether a utilization	established by the P&T Committee - which drugs will be covered
management requirement will apply to a drug. Cigna's formulary	on the formularies offered by Cigna to plans and whether a
committees collectively consider the factors and evidentiary	utilization management requirement will apply to a drug. Cigna's
standards described in the narratives to Steps 2 and 3 in deciding	formulary committees collectively consider the factors and
whether to place a drug on the formulary and, if so, on which	evidentiary standards described in the narratives to Steps 2 and 3
formulary tier.	in deciding whether to place a drug on the formulary and, if so,
Cigna's review evidences that the written processes and standards used to determine formulary placement is not only comparable, but identical, across M/S and MH/SUD drugs. The same P&T and Value Assessment Committee structure reviews M/S and MH/SUD drugs for formulary placement pursuant to common policies and procedures, and the processes and aforementioned factors and evidentiary standards considered in formulary placement does not differ by whether the drug is used to treat a M/S condition or a MH/SUD condition.	on which formulary tier. Cigna's review evidences that the written processes and standards used to determine formulary placement is not only comparable, but identical, across M/S and MH/SUD drugs. The same P&T and Value Assessment Committee structure reviews M/S and MH/SUD drugs for formulary placement pursuant to common policies and procedures, and the processes and aforementioned factors and evidentiary standards considered in formulary placement does not differ by whether the drug is used to treat a M/S condition or a MH/SUD condition.

E. Provide any evidence and documentation to establish that the limitation(s) is applied no more stringently, as written and in operation, to mental health and substance use disorder benefits than to medical and surgical benefits.

Cigna has confirmed that its utilization management programs are applied comparably, and no more stringently, to MH/SUD drugs as compared to M/S drugs. Its written policies governing formulary placement and application of utilization management do not distinguish between the processes, factors or standards that inform design and application of the formulary placement and utilization management NQTLs. Indeed, Cigna uses one, combined policy to govern its formulary management and utilization management requirements across M/S and MH/SUD benefits, and, while uniformity in processes is not required by the NQTL requirements (only comparability), uniformity in processes for designing and applying an NQTL can evidence comparability in the NQTL as-written.

In terms of operational parity compliance, Cigna confirmed that all drugs, whether MH/SUD or M/S drugs, that the P&T Committee designates must be covered are, in fact, covered on the formulary, and all drugs' coverage conform to other P&T Committee clinical

parameters dictating the circumstances under which a drug can be preferred over another drug through tier placement or subject to step therapy requirements mandating use of one drug over another for coverage purposes. Moreover, Cigna's coverage of MH/SUD and M/S drugs all conform to the aforementioned standards established for Tier 1, Tier 2, Tier 3, and, as applicable for policyholders that elect to offer a specialty drug tier, Tier 4 placement status, and drugs subject to a utilization management requirement, including prior authorization, step therapy, and/or quantity limits, conform to the aforementioned standards established for inclusion in a utilization management program. That is, Cigna does not apply a utilization management requirement to an MH/SUD drug that does not exhibit the factors/standards described in the preceding columns that, as-written, justify application of a utilization management requirement to a drug, and in terms of stringency of application of the NQTL no M/S drugs are omitted from a utilization management requirement if they exhibit the same factors/standards.

While operational outcomes are not determinative of NQTL compliance, and an insurer may comply with the NQTL requirement notwithstanding a disparate outcome for an NQTL applied to MH/SUD benefits as compared to M/S benefits, comparable outcomes can help evidence compliance with the in-operation component of the NQTL requirement. Consequently, Cigna concludes that the NQTLs of formulary management and utilization management were applied comparably and no more stringently to MH/SUD benefits than to M/S benefits.

Cigna has confirmed that its utilization management programs are applied comparably, and no more stringently, to MH/SUD drugs as compared to M/S drugs. Its written policies governing formulary placement and application of utilization management do not distinguish between the processes, factors or standards that inform design and application of the formulary placement and utilization management NQTLs. Indeed, Cigna uses one, combined policy to govern its formulary management and utilization management requirements across M/S and MH/SUD benefits, and, while uniformity in processes is not required by the NQTL requirements (only comparability), uniformity in processes for designing and applying an NQTL can evidence comparability in the NQTL as-written.

7. <u>Prescription Drug Formulary Design</u>

A. Provide the specific plan language for each NQTL in the above defined category and identify the medical/surgical and mental health and/or substance use disorder benefits to which it applies;

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
The plan offers a multi-tiered formulary that includes covered	The plan offers a multi-tiered formulary that includes covered
MH/SUD and M/S drugs; a tiered formulary design is considered	MH/SUD and M/S drugs; a tiered formulary design is considered
an NQTL and, as such, the methodology by which drugs are placed	an NQTL and, as such, the methodology by which drugs are
on specific formulary tiers is subject to the NQTL parity	placed on specific formulary tiers is subject to the NQTL parity
requirement.	requirement.

B. Identify the factors used in the development of the limitation(s);

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
When deciding whether to place a drug on a three-tiered formulary,	When deciding whether to place a drug on a three-tiered
and, if so, on which formulary tier, the formulary committee	formulary, and, if so, on which formulary tier, the formulary
considers the following factors: the brand or generic status of a	committee considers the following factors: the brand or generic
drug; whether, as applicable, a brand drug has available generic	status of a drug; whether, as applicable, a brand drug has
alternatives; whether the drug is the lowest net cost drug as	available generic alternatives; whether the drug is the lowest net
compared to therapeutic alternatives; and whether a rebate	cost drug as compared to therapeutic alternatives; and whether a
arrangement exists for the drug to offset its cost.	rebate arrangement exists for the drug to offset its cost.
The source for the brand or generic status factor is a publication of drug indicators available from an external vendor (First DataBank). The sources for whether a drug has available generic alternatives are available drug indicators from First DataBank and other external information about other drugs available in the same therapeutic class. The sources for whether the drug is the lowest net cost drug as compared to therapeutic alternatives is internal drug claims utilization information. The source for whether a rebate arrangement exists for the drug to offset its cost is rebate contract or billing information.	The source for the brand or generic status factor is a publication of drug indicators available from an external vendor (First DataBank). The sources for whether a drug has available generic alternatives are available drug indicators from First DataBank and other external information about other drugs available in the same therapeutic class. The sources for whether the drug is the lowest net cost drug as compared to therapeutic alternatives is internal drug claims utilization information. The source for whether a rebate arrangement exists for the drug to offset its cost is rebate contract or billing information.

C. Identify the sources (including any processes, strategies, or evidentiary standards) used to evaluate the factors identified above;

Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
The source for the brand or generic status factor is a publication of	The source for the brand or generic status factor is a publication
drug indicators available from an external vendor (First DataBank).	of drug indicators available from an external vendor (First
The sources for whether a drug has available generic alternatives	DataBank). The sources for whether a drug has available generic
are available drug indicators from First DataBank and other	alternatives are available drug indicators from First DataBank
external information about other drugs available in the same	and other external information about other drugs available in the
therapeutic class. The sources for whether the drug is the lowest	same therapeutic class. The sources for whether the drug is the
net cost drug as compared to therapeutic alternatives is internal	lowest net cost drug as compared to therapeutic alternatives is
drug claims utilization information. The source for whether a	internal drug claims utilization information. The source for
rebate arrangement exists for the drug to offset its cost is rebate	whether a rebate arrangement exists for the drug to offset its cost
contract or billing information.	is rebate contract or billing information.

D. Identify the methods and analysis used in the development of the limitation(s); and

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
The evidentiary standards for tier placement of MH/SUD and M/S drugs are comparable, and no more stringently applied to MH/SUD drugs. Essentially, the evidentiary standards for each factor that dictate placement of a drug on a particular tier function collectively as definitions for each formulary tier, that is, what qualifies a drug for placement on a particular tier.	The evidentiary standards for tier placement of MH/SUD and M/S drugs are comparable, and no more stringently applied to MH/SUD drugs. Essentially, the evidentiary standards for each factor that dictate placement of a drug on a particular tier function collectively as definitions for each formulary tier, that is, what qualifies a drug for placement on a particular tier.
Tier 1 of the formulary includes covered generic drugs. Tier 2 of	Tier 1 of the formulary includes covered generic drugs. Tier 2 of
the formulary includes covered preferred brand drugs. Tier 3 of the	the formulary includes covered preferred brand drugs. Tier 3 of
formulary includes covered non-preferred brand drugs. The brand	the formulary includes covered non-preferred brand drugs. The
or generic status of a drug is determined by reference to an	brand or generic status of a drug is determined by reference to an
algorithm that analyzes available drug indicators, currently	algorithm that analyzes available drug indicators, currently
including First DataBank's drug indicator file, and not by reference	including First DataBank's drug indicator file, and not by
to the drug's status as an M/S or MH/SUD benefit. If the algorithm	reference to the drug's status as an M/S or MH/SUD benefit. If
identifies a covered drug as a generic drug, then the drug is covered	the algorithm identifies a covered drug as a generic drug, then the
on Tier 1 of the formulary, whether an MH/SUD or M/S drug. If	drug is covered on Tier 1 of the formulary, whether an MH/SUD
brand drug status is determined by application of the algorithm, a	or M/S drug. If brand drug status is determined by application of

covered brand drug is typically placed on Tier 2 as a preferred brand drug if either it lacks available generic alternatives (inclusive of therapeutic equivalents and therapeutic alternatives) based on an assessment of First DataBank drug indicators and/or external information about alternative drugs in the same therapeutic class, or if a rebate arrangement exists for the brand drug. Conversely, a covered brand drug is typically placed on Tier 3 as a non-preferred brand drug if it either has available generic alternatives or there is no rebate arrangement for the brand drug.	the algorithm, a covered brand drug is typically placed on Tier 2 as a preferred brand drug if either it lacks available generic alternatives (inclusive of therapeutic equivalents and therapeutic alternatives) based on an assessment of First DataBank drug indicators and/or external information about alternative drugs in the same therapeutic class, or if a rebate arrangement exists for the brand drug. Conversely, a covered brand drug is typically placed on Tier 3 as a non-preferred brand drug if it either has available generic alternatives or there is no rebate arrangement for the brand drug.
A minority of drugs are not covered on any formulary tier; these	
drugs may be referred to as "non-formulary" drugs. A drug may be	A minority of drugs are not covered on any formulary tier; these
designated as non-formulary or excluded for one of several possible	drugs may be referred to as "non-formulary" drugs. A drug may
reasons, whether it is an M/S or MH/SUD benefit. A drug may be	be designated as non-formulary or excluded for one of several
designated as non-formulary because it is excluded from coverage	possible reasons, whether it is an M/S or MH/SUD benefit. A
by the plan irrespective of medical necessity (e.g. the drug is not	drug may be designated as non-formulary because it is excluded
FDA-approved, or prescribed to treat a condition not covered by	from coverage by the plan irrespective of medical necessity (e.g.
the benefit plan), or because the applicable formulary committee(s)	the drug is not FDA-approved, or prescribed to treat a condition
determine after consideration of several factors that it doesn't	not covered by the benefit plan), or because the applicable
warrant coverage on the formulary. If the formulary committee	formulary committee(s) determine after consideration of several
identifies that a given brand or generic drug has covered therapeutic	factors that it doesn't warrant coverage on the formulary. If the
alternatives available that project to have lower net cost(s) than the	formulary committee identifies that a given brand or generic drug
drug in question (inclusive of an assessment of projected ingredient	has covered therapeutic alternatives available that project to have
cost expenditures as sourced from claims/reimbursement	lower net cost(s) than the drug in question (inclusive of an
information and available rebate revenue), then the drug may be	assessment of projected ingredient cost expenditures as sourced
designated as non-formulary. Non-formulary drugs	from claims/reimbursement information and available rebate
	revenue), then the drug may be designated as non-formulary.
	Non-formulary drugs

E. Provide any evidence and documentation to establish that the limitation(s) is applied no more stringently, as written and in operation, to mental health and substance use disorder benefits than to medical and surgical benefits.

With respect to parity compliance as-written, the same, and not just comparable, processes, factors, and standards are used to determine formulary placement to an MH/SUD or M/S drug.

With respect to the process by which the NQTL is designed and applied, the same formulary committee structure makes decisions with respect to MH/SUD or M/S drugs the ensures appropriate expertise across MH/SUD and M/S treatment. Two Cigna committees perform different, but interrelated, functions when designing utilization management requirements like quantity limits: the Cigna Pharmacy & Therapeutics Committee ("P&T Committee"); and, the Cigna Value Assessment Committee. Cigna uses one, combined set of policies to govern its formulary management practices across M/S and MH/SUD drugs, and, while uniformity in processes is not required by the NQTL requirements (only comparability), uniformity in processes for designing and applying an NQTL can evidence comparability in the NQTL as-written.

The P&T Committee is composed of voting external clinicians across a number of specialties that perform, among other responsibilities, clinical reviews of drugs to determine whether a drug must be covered on the formulary as a clinical matter. The P&T Committee includes among its voting members a psychiatrist to help ensure that, like other medical specialties, appropriate expertise in MH/SUD treatment is represented when reviewing the clinical safety/efficacy of drugs that may be considered MH/SUD benefits. By including a psychiatrist on the clinical P&T committee, Cigna ensures that comparable clinical expertise in treating MH/SUD conditions and M/S conditions is represented in the formulary decision-making process. While physicians, regardless of specialty, may be able to review the clinical safety/efficacy profile of an MH/SUD drug just as readily as M/S drugs used to treat conditions that the physician may not specialize in treating, Cigna acknowledges the benefits to its formulary management process of including MH/SUD expertise on the clinical P&T Committee. In the context of NQTL compliance, the inclusion of a physician with appropriate MH/SUD treatment expertise on the clinical P&T Committee that assigns clinical designations to M/S and MH/SUD drugs evidences the comparability of the process by which formulary management decisions are made, in writing and in operation, across M/S and MH/SUD prescription drug benefits. Relatedly, it also helps to ensure for MH/SUD drugs the appropriate consideration of the factors and standards that inform Cigna's formulary management decisions. In rendering clinical findings on drugs, the P&T Committee assesses the FDA labeling and, as appropriate and available, clinical practice standards/trends and documentation like clinical literature and guidelines. The Value Assessment Committee is composed of representatives representing several functional areas of the combined company, including, for example, clinicians and representatives from Cigna's finance areas, that have experience with formulary management or PBM/health plan operations, and is responsible for deciding - within the clinical parameters established by the P&T Committee - which drugs will be covered on the formularies offered by Cigna to plans and whether a utilization management requirement will apply to a drug. Cigna's formulary committees collectively consider the factors and evidentiary standards described in the narratives to Steps 2 and 3 in deciding whether to place a drug on the formulary and, if so, on which formulary tier.

Cigna's review evidences that the written processes and standards used to determine formulary placement is not only comparable, but identical, across M/S and MH/SUD drugs. The same P&T and Value Assessment Committee structure reviews M/S and MH/SUD drugs for formulary placement pursuant to common policies and procedures, and the processes and aforementioned factors and evidentiary standards considered in formulary placement does not differ by whether the drug is used to treat a M/S condition or a MH/SUD condition.

In terms of operational parity compliance, the formulary placement of MH/SUD and M/S drugs all conform to the aforementioned evidentiary standards established for Tier 1, Tier 2, and Tier 3.

Moreover, as further evidence of comparability and equivalent stringency in-operation, Cigna has also assessed as follows across its formularies: a comparable percentage of MH/SUD drugs are covered on v. off-formulary as compared to M/S drugs; a lower absolute number of MH/SUD drugs are covered off-formulary as compared to M/S drugs; a comparable, and indeed a lower, percentage of MH/SUD brand drugs are covered on the non-preferred brand tier (Tier 3) relative to the total number of MH/SUD drugs covered on Tiers 1 and 2 of the formulary, as compared to the proportion of M/S drugs covered on Tier 3 relative to the total M/S drugs are placed on Tier 1 and 2 of the formulary. As all generic drugs covered on the formulary are placed on Tier 1 and no brand drugs are placed on Tier 1, whether MH/SUD or M/S benefits, the placement of drugs on Tier 1 of the formulary is deemed to meet the NQTL stringency and comparability requirements for formulary placement. Put differently, there are no differences in placement of covered generic drugs for MH/SUD or M/S drugs, as the evidentiary standard – which was consistently applied to the placement of MH/SUD and M/S drugs on the formulary – for Tier 1 placement is the generic status of a drug.

While operational outcomes are not determinative of NQTL compliance, and a plan may comply with the NQTL requirement notwithstanding a disparate outcome for an NQTL applied to MH/SUD benefits as compared to M/S benefits, comparable outcomes can help evidence compliance with the in-operation component of the NQTL requirement. Consequently, the NQTL for multi-tiered formulary design was applied comparably and no more stringently to MH/SUD benefits than to M/S benefits.

The application of the same NQTL standard across M/S and MH/SUD benefits demonstrates as written and in operation reflect they are comparable and no more stringent for MH/SUD services within a classification of benefits than for medical/surgical services within the prescription drug classification of benefits.

In summary, the comparative analyses documented in the narratives to Steps 4 and 5, which themselves construe the application of the multi-tiered formulary design NQTL described in Steps 1 through 3, demonstrate the compliance in-writing and in-operation of the quantity limit/prior authorization NQTL. While operational outcomes are not determinative of NQTL compliance, and a plan may comply with the NQTL requirement notwithstanding a disparate outcome for an NQTL applied to MH/SUD benefits as compared to M/S benefits, comparable outcomes can help evidence compliance with the in-operation component of the NQTL requirement. In this case, there were comparable and, in some cases more advantageous, outcomes for the placement and tiering of MH/SUD drugs as compared to M/S drugs based on the absolute number of, and incidence of, non-formulary v. formulary and, for on-formulary drugs, Tier 2 v. Tier 3 drugs. These comparable outcomes, along with the confirmation that the evidentiary standards and factors were actually applied consistently to MH/SUD drugs as compared to M/S drugs, evidence in-operation compliance in terms of comparability and equivalent stringency.

8. Case Management

A. Provide the specific plan language for each NQTL in the above defined category and identify the medical/surgical and mental health and/or substance use disorder benefits to which it applies;

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Case Management	Case Management
Case Management is a service provided through a Review	Case Management is a service provided through a Review
Organization, which assists individuals with treatment needs that	Organization, which assists individuals with treatment needs that
extend beyond the acute care setting. The goal of Case	extend beyond the acute care setting. The goal of Case
Management is to ensure that patients receive appropriate care in	Management is to ensure that patients receive appropriate care in
the most effective setting possible whether at home, as an	the most effective setting possible whether at home, as an
outpatient, or an inpatient in a Hospital or specialized facility.	outpatient, or an inpatient in a Hospital or specialized facility.
Should the need for Case Management arise, a Case Management	Should the need for Case Management arise, a Case Management
professional will work closely with the patient, his or her family	professional will work closely with the patient, his or her family
and the attending Physician to determine appropriate treatment	and the attending Physician to determine appropriate treatment
options which will best meet the patient's needs and keep costs	options which will best meet the patient's needs and keep costs
manageable. The Case Manager will help coordinate the treatment	manageable. The Case Manager will help coordinate the treatment
program and arrange for necessary resources. Case Managers are	program and arrange for necessary resources. Case Managers are
also available to answer questions and provide ongoing support for	also available to answer questions and provide ongoing support for
the family in times of medical crisis.	the family in times of medical crisis.
Case Managers are Registered Nurses (RNs) and other	Case Managers are Registered Nurses (RNs) and other
credentialed health care professionals, each trained in a clinical	credentialed health care professionals, each trained in a clinical
specialty area such as trauma, high risk pregnancy and neonates,	specialty area such as trauma, high risk pregnancy and neonates,
oncology, mental health, rehabilitation or general medicine and	oncology, mental health, rehabilitation or general medicine and
surgery. A Case Manager trained in the appropriate clinical	surgery. A Case Manager trained in the appropriate clinical
specialty area will be assigned to you or your dependent. In	specialty area will be assigned to you or your dependent. In
addition, Case Managers are supported by a panel of Physician	addition, Case Managers are supported by a panel of Physician
advisors who offer guidance on up-to-date treatment programs and	advisors who offer guidance on up-to-date treatment programs and
medical technology. While the Case Manager recommends	medical technology. While the Case Manager recommends
alternate treatment programs and helps coordinate needed	alternate treatment programs and helps coordinate needed
resources, the patient's attending Physician remains responsible for	resources, the patient's attending Physician remains responsible for
the actual medical care.	the actual medical care.

You, your dependent or an attending Physician can request Case Management services by calling the **toll-free number** shown on your ID card during normal business hours, Monday through Friday. In addition, your employer, a claim office or a utilization review program (see the PAC/CSR section of your certificate) may refer an individual for Case Management.

- The Review Organization assesses each case to determine whether Case Management is appropriate.
- You or your Dependent is contacted by an assigned Case Manager who explains in detail how the program works. Participation in the program is voluntary - no penalty or benefit reduction is imposed if you do not wish to participate in Case Management.
- Following an initial assessment, the Case Manager works with you, your family and Physician to determine the needs of the patient and to identify what alternate treatment programs are available (for example, in-home medical care in lieu of an extended Hospital convalescence). You are not penalized if the alternate treatment program is not followed.
- The Case Manager arranges for alternate treatment services and supplies, as needed (for example, nursing services or a Hospital bed and other Durable Medical Equipment for the home).
- The Case Manager also acts as a liaison between the insurer, the patient, his or her family and Physician as needed (for example, by helping you to understand a complex medical diagnosis or treatment plan).
- Once the alternate treatment program is in place, the Case Manager continues to manage the case to ensure the treatment program remains appropriate to the patient's needs.

You, your dependent or an attending Physician can request Case Management services by calling the **toll-free number** shown on your ID card during normal business hours, Monday through Friday. In addition, your employer, a claim office or a utilization review program (see the PAC/CSR section of your certificate) may refer an individual for Case Management.

- The Review Organization assesses each case to determine whether Case Management is appropriate.
- You or your Dependent is contacted by an assigned Case Manager who explains in detail how the program works. Participation in the program is voluntary - no penalty or benefit reduction is imposed if you do not wish to participate in Case Management.
- Following an initial assessment, the Case Manager works with you, your family and Physician to determine the needs of the patient and to identify what alternate treatment programs are available (for example, in-home medical care in lieu of an extended Hospital convalescence). You are not penalized if the alternate treatment program is not followed.
- The Case Manager arranges for alternate treatment services and supplies, as needed (for example, nursing services or a Hospital bed and other Durable Medical Equipment for the home).
- The Case Manager also acts as a liaison between the insurer, the patient, his or her family and Physician as needed (for example, by helping you to understand a complex medical diagnosis or treatment plan).
- Once the alternate treatment program is in place, the Case Manager continues to manage the case to ensure the treatment program remains appropriate to the patient's needs.

While participation in Case Management is strictly voluntary,	While participation in Case Management is strictly voluntary,
Case Management professionals can offer quality, cost-effective	Case Management professionals can offer quality, cost-effective
treatment alternatives, as well as provide assistance in obtaining	treatment alternatives, as well as provide assistance in obtaining
needed medical resources and ongoing family support in a time of	needed medical resources and ongoing family support in a time of
need.	need.

B. Identify the factors used in the development of the limitation(s);

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Health plan enrollees are not required to participate in case management services.	Health plan enrollees are not required to participate in case management services.
Case management services are completely voluntary. Because	Case management services are completely voluntary. Because
case management services are not designed to limit the scope of	case management services are not designed to limit the scope of
benefit coverage or the duration of treatment, case management	benefit coverage or the duration of treatment, case management
services would not be considered a non-quantitative treatment	services would not be considered a non-quantitative treatment
limitation.	limitation.

C. Identify the sources (including any processes, strategies, or evidentiary standards) used to evaluate the factors identified above;

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Health plan enrollees are not required to participate in case	Health plan enrollees are not required to participate in case
management services.	management services.
Case management services are completely voluntary. Because case management services are not designed to limit the scope of benefit coverage or the duration of treatment, case management services would not be considered a non-quantitative treatment limitation.	Case management services are completely voluntary. Because case management services are not designed to limit the scope of benefit coverage or the duration of treatment, case management services would not be considered a non-quantitative treatment limitation.

D. Identify the methods and analysis used in the development of the limitation(s); and

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Health plan enrollees are not required to participate in case management services.	Health plan enrollees are not required to participate in case management services.
Case management services are completely voluntary. Because	Case management services are completely voluntary. Because
case management services are not designed to limit the scope of	case management services are not designed to limit the scope of
benefit coverage or the duration of treatment, case management	benefit coverage or the duration of treatment, case management
services would not be considered a non-quantitative treatment	services would not be considered a non-quantitative treatment
limitation.	limitation.

E. Provide any evidence and documentation to establish that the limitation(s) is applied no more stringently, as written and in operation, to mental health and substance use disorder benefits than to medical and surgical benefits.

Participation in case management services is not required, and an enrollee's participation in case management services does not limit the scope or duration of benefits for either MH/SUD or M/S benefits. Consequently, case management does not function as an NQTL under the cited parity requirement. Notwithstanding the inapplicability of the NQTL requirement to Cigna's voluntary case management program, Cigna offers case management services to enrollees with either complex MH/SUD or M/S conditions.

9. Process for Assessment of New Technologies

A. Provide the specific plan language for each NQTL in the above defined category and identify the medical/surgical and mental health and/or substance use disorder benefits to which it applies;

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Experimental, investigational and unproven services are medical,	Experimental, investigational and unproven services are medical,
surgical, diagnostic, psychiatric, substance use disorder or other health	surgical, diagnostic, psychiatric, substance use disorder or other health
care technologies, supplies, treatments, procedures, drug or Biologic	care technologies, supplies, treatments, procedures, drug or Biologic
therapies or devices that are determined by the utilization review	therapies or devices that are determined by the utilization review
Physician to be:	Physician to be:

- not approved by the U.S. Food and Drug Administration (FDA) or other appropriate regulatory agency to be lawfully marketed;
- not demonstrated, through existing peer-reviewed, evidencebased, scientific literature to be safe and effective for treating or diagnosing the condition or Sickness for which its use is proposed;
- the subject of review or approval by an Institutional Review Board for the proposed use except as provided in the "Clinical Trials" sections of this plan; or
- the subject of an ongoing phase I, II, III or IV clinical trial, except for routine patient care costs related to qualified clinical trials as provided in the "Clinical Trials" sections of this plan.

In determining whether drug or Biologic therapies are experimental, investigational and unproven, the utilization review Physician may review, without limitation, U.S. Food and Drug Administration-approved labeling, the standard medical reference compendia and peer-reviewed, evidence-based scientific literature.

The plan or policy shall not deny coverage for a drug or Biologic therapy as experimental, investigational and unproven if the drug or Biologic therapy is otherwise approved by the FDA to be lawfully marketed, has not been contraindicated by the FDA for the use for which the drug or Biologic has been prescribed, and is being offered in a clinical trial approved by one of the following:

- the national institutes of health (NIH);
- an NIH cooperative group or an NIH center;
- the FDA in the form of an investigational new drug application;
- the federal department of veterans affairs; or
- an institutional review board of an institution in the state that has a multiple project assurance contract approved by the office of protection from research risks of the NIH.

- not approved by the U.S. Food and Drug Administration (FDA) or other appropriate regulatory agency to be lawfully marketed;
- not demonstrated, through existing peer-reviewed, evidencebased, scientific literature to be safe and effective for treating or diagnosing the condition or Sickness for which its use is proposed;
- the subject of review or approval by an Institutional Review Board for the proposed use except as provided in the "Clinical Trials" sections of this plan; or
- the subject of an ongoing phase I, II, III or IV clinical trial, except for routine patient care costs related to qualified clinical trials as provided in the "Clinical Trials" sections of this plan.

In determining whether drug or Biologic therapies are experimental, investigational and unproven, the utilization review Physician may review, without limitation, U.S. Food and Drug Administration-approved labeling, the standard medical reference compendia and peer-reviewed, evidence-based scientific literature.

The plan or policy shall not deny coverage for a drug or Biologic therapy as experimental, investigational and unproven if the drug or Biologic therapy is otherwise approved by the FDA to be lawfully marketed, has not been contraindicated by the FDA for the use for which the drug or Biologic has been prescribed, and is being offered in a clinical trial approved by one of the following:

- the national institutes of health (NIH);
- an NIH cooperative group or an NIH center;
- the FDA in the form of an investigational new drug application;
- the federal department of veterans affairs; or
- an institutional review board of an institution in the state that has a multiple project assurance contract approved by the office of protection from research risks of the NIH.

B. Identify the factors used in the development of the limitation(s);

Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
Cigna considers the following factors in determining whether a services is experimental, investigational or unproven:	Cigna considers the following factors in determining whether a services is experimental, investigational or unproven:
• inadequate volume of existing peer-reviewed, evidence-based, scientific literature to establish whether or not a technology, supplies, treatments, procedures, or devices is safe and effective for treating or diagnosing the condition or sickness for which its use is proposed;	• inadequate volume of existing peer-reviewed, evidence-based, scientific literature to establish whether or not a technology, supplies, treatments, procedures, or devices is safe and effective for treating or diagnosing the condition or sickness for which its use is proposed;
• when subject to U.S. Food and Drug Administration (FDA) or other appropriate regulatory agency review, not approved to be lawfully marketed for the proposed use;	• when subject to U.S. Food and Drug Administration (FDA) or other appropriate regulatory agency review, not approved to be lawfully marketed for the proposed use;
• the subject of review or approval by an Institutional Review Board for the proposed use except as provided in the in a clinical trial	• the subject of review or approval by an Institutional Review Board for the proposed use except as provided in the in a clinical trial
• the subject of an ongoing phase I, II or III clinical trial, except for routine patient care costs related to qualified clinical trials as provided in the clinical trials section below.	• the subject of an ongoing phase I, II or III clinical trial, except for routine patient care costs related to qualified clinical trials as provided in the clinical trials section below.

C. Identify the sources (including any processes, strategies, or evidentiary standards) used to evaluate the factors identified above;

Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
 In approving new technology, MTAC uses principles of evidence-based medicine in its evaluation of the following sources: clinical literature FDA approval or clearance, as appropriate, is necessary, but not sufficient, for Cigna to consider a technology to be proven. FDA approval or clearance English language peer reviewed publications including documents prepared by specialty societies and evidence-based review centers, such as the Agency for Health Care Research 	 In approving new technology, MTAC uses principles of evidence-based medicine in its evaluation of the following sources: clinical literature FDA approval or clearance, as appropriate, is necessary, but not sufficient, for Cigna to consider a technology to be proven. FDA approval or clearance English language peer reviewed publications including documents prepared by specialty societies and evidence-based review centers, such as the Agency for Health Care Research
and Quality.	and Quality.

D. Identify the methods and analysis used in the development of the limitation(s); and

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Levels of evidence are assigned to the publications based upon	Levels of evidence are assigned to the publications based upon
underlying study characteristics, including but not limited to	underlying study characteristics, including but not limited to
incidence and prevalence of disease, study design, number of	incidence and prevalence of disease, study design, number of
subjects, clinical outcomes of relevance, statistics used and	subjects, clinical outcomes of relevance, statistics used and
significance, and assessment of flaws and bias. A research team	significance, and assessment of flaws and bias. A research team
performs a synthetic assessment of the literature in order to	performs a synthetic assessment of the literature in order to
determine if there is a sufficiently evidence based proven	determine if there is a sufficiently evidence based proven
relationship between the intervention and improved health	relationship between the intervention and improved health
outcomes.	outcomes.
Cigna considers other sources of internal and external information	Cigna considers other sources of internal and external information
as part of its decision making process including input from health	as part of its decision making process including input from health
care professionals and other interested parties. Health care	care professionals and other interested parties. Health care
professionals may share their comments with the regional market	professionals may share their comments with the regional market
medical executive representing a specific geography, account or	medical executive representing a specific geography, account or
subject matter issue. The information is reviewed as part of the	subject matter issue. The information is reviewed as part of the
annual update process.	annual update process.

E. Provide any evidence and documentation to establish that the limitation(s) is applied no more stringently, as written and in operation, to mental health and substance use disorder benefits than to medical and surgical benefits.

The definition of experimental/investigational /unproven services is the same for MS and MH/SUD. A single review committee, Cigna's MTAC evaluates all new technologies for M/S and MH/SUD benefits.

Cigna's methodology and processes for determining whether M/S interventions and MH/SUD interventions within a classification of benefits are experimental, investigational and/or unproven are comparable and no more stringent for MH/SUD services within a classification of benefits than for M/S services within the same classification of benefits as written and in operation.

Cigna collects, tracks and trends relevant metrics on a semi-annual basis for services within each classification of medical/surgical and MH/SUD benefits. Metrics may include initial EIU coverage denials, coverage denials upheld and overturned upon internal appeal and coverage denials upheld and overturned upon external appeal/review.

An "in operation" review of claims data from a sampling of Cigna-administered plans revealed no excessive denial rates for MH/SUD claims denied as experimental, investigational and unproven as compared to medical/surgical claims denied as experimental, investigational and unproven. An "in operation" review of Cigna's application of the Experimental, Investigational, and Unproven NQTL, specifically approvals and denial information, in the "All Other Outpatient, Out-of-Network, Services" classification revealed no statistically significant discrepancies in EIU denial rates as-between MH/SUD and M/S benefits.

While operational outcomes are not determinative of NQTL compliance, and an insurer may comply with the NQTL requirement notwithstanding a disparate outcome for an NQTL applied to MH/SUD benefits as compared to M/S benefits, comparable outcomes can help evidence compliance with the in-operation component of the NQTL requirement. Consequently, Cigna concludes that the NQTL was applied comparably and no more stringently to MH/SUD benefits than to M/S benefits.

The application of the same NQTL standard across M/S and MH/SUD benefits demonstrates as written and in operation reflect they are comparable and no more stringent for MH/SUD services within a classification of benefits than for medical/surgical services within the same classification of benefits.

The use of MTAC for development of evidence based Coverage Policies for M/S and MH/SUD demonstrates as written and in operation reflect they are comparable and no more stringent for MH/SUD services.

10. Standards for Provider Credentialing and Contracting

A. Provide the specific plan language for each NQTL in the above defined category and identify the medical/surgical and mental health and/or substance use disorder benefits to which it applies;

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Cigna maintains an open network for M/S providers such that new providers looking to contract with Cigna will be admitted if they meet Cigna's network admission criteria.	Cigna maintains an open network for MH/SUD providers, such that new providers looking to contract with Cigna will be admitted if they meet Cigna's network admission criteria.
When determining whether to admit a provider into its provider	When determining whether to admit a provider into its provider
network, Cigna takes into consideration an array of factors	network, Cigna takes into consideration an array of factors
including, but not limited to provider type and/or specialty;	including, but not limited to provider type and/or specialty;
geographic market; supply of provider type and/or specialty;	geographic market; supply of provider type and/or specialty;
demand for provider type and/or specialty; and provider licensure	demand for provider type and/or specialty; and provider licensure
and/or certification.	and/or certification.

B. Identify the factors used in the development of the limitation(s);

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
 Credentialing Requirements for facilities: Signed application Signed agreement Unrestricted license/state operating certificate Accreditation Acceptable history of Medicaid and Medicare sanction information Acceptable history of malpractice claim experience Proof of professional and general liability insurance coverage Quality Assurance/Quality Improvement Program 	 Credentialing Requirements for facilities: Signed application Signed agreement Unrestricted license/state operating certificate Accreditation Acceptable history of Medicaid and Medicare sanction information Acceptable history of malpractice claim experience Proof of professional and general liability insurance coverage Quality Assurance/Quality Improvement Program

 Credentialing Requirements for independently practicing practitioners: Signed application Signed agreement to participate Unrestricted state license to practice Valid unrestricted DEA and CDS certificate for practitioners choosing to prescribe controlled substances In good standing at facility at which he/she has privileges Verification of education, training, license and board certification Acceptable history of Medicaid and Medicare sanction information Acceptable history of sanctions (i.e. restrictions on license and/or scope of practice) Acceptable history of malpractice claim experience 	 Credentialing Requirements for independently practicing practitioners: Signed application Signed agreement to participate Unrestricted state license to practice Valid unrestricted DEA and CDS certificate for practitioners choosing to prescribe controlled substances In good standing at facility at which he/she has privileges Verification of education, training, license and board certification Acceptable history of Medicaid and Medicare sanction information Acceptable history of sanctions (i.e. restrictions on license and/or scope of practice) Acceptable history of malpractice claim experience
 Verification of education, training, license and board certification Acceptable history of Medicaid and Medicare sanction information Acceptable history of sanctions (i.e. restrictions on license and/or scope of practice) 	 In good standing at faci Verification of education certification Acceptable history of N information Acceptable history of sa and/or scope of practice

C. Identify the sources (including any processes, strategies, or evidentiary standards) used to evaluate the factors identified above;

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Cigna follows NCQA, CMS, state and federal requirements and guidelines for each provider and/or specialty type. The standard	Cigna follows NCQA, CMS, state and federal requirements and guidelines for each provider and/or specialty type. The standard
credentialing process is used for both licensed physician providers	credentialing process is used for both licensed physician providers
and licensed non-physician providers. See process above.	and licensed non-physician providers. See process above.

D. Identify the methods and analysis used in the development of the limitation(s); and

Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
Unlicensed providers may not be directly contracted, but may	Unlicensed providers may not be directly contracted, but may
render services under a fully contracted and credentialed	render services under a fully contracted and credentialed
individual (supervising provider) or entity. For example, Home	individual (supervising provider) or entity. For example, Home

Health Aides are not individually credentialed or contracted	Health Aides are not individually credentialed or contracted
directly, the Home Health Agency is contracted and credentialed	directly, the Home Health Agency is contracted and credentialed
as an entity (facility or clinic). Cigna does not contract directly	as an entity (facility or clinic). Cigna does not contract directly
with most of these types of providers but rather, with the entity	with most of these types of providers but rather, with the entity
they work for. If certifications are available for paraprofessionals,	they work for. If certifications are available for paraprofessionals,
it is reviewed for credentialing purposes.	it is reviewed for credentialing purposes.

E. Provide any evidence and documentation to establish that the limitation(s) is applied no more stringently, as written and in operation, to mental health and substance use disorder benefits than to medical and surgical benefits.

Cigna does not distinguish between M/S and MH/SUD for purposes of credentialing unlicensed professionals and paraprofessionals. For M/S and MH/SUD, unlicensed providers may not be directly contracted or credentialed but may render services under a fully contracted and credentialed individual (supervising provider) or entity (clinic or facility)

Cigna's credentialing standards for unlicensed professionals and paraprofessionals follows applicable NCQA, CMS and state and federal requirements and guidelines for MS and MH/SUD providers. The credentialing application process is consistent between M/S and MH/SUD and such required licensing, experience, CAQH application and verifications are distinguishable only by differences in regulatory requirements. No additional Cigna-specific credentialing requirements are applied to either M/S or MH/SUD providers.

Consistency in standards and process evidences compliance with the NQTL requirement.

11. Exclusions for Failure to Complete a Course of Treatment

A. Provide the specific plan language for each NQTL in the above defined category and identify the medical/surgical and mental health and/or substance use disorder benefits to which it applies;

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Cigna does not exclude benefits for failure to complete treatment.	Cigna does not exclude benefits for failure to complete treatment.

B. Identify the factors used in the development of the limitation(s);

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Cigna does not exclude benefits for failure to complete treatment.	Cigna does not exclude benefits for failure to complete treatment.

C. Identify the sources (including any processes, strategies, or evidentiary standards) used to evaluate the factors identified above;

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Cigna does not exclude benefits for failure to complete treatment.	Cigna does not exclude benefits for failure to complete treatment.

D. Identify the methods and analysis used in the development of the limitation(s); and

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Cigna does not exclude benefits for failure to complete treatment.	Cigna does not exclude benefits for failure to complete treatment.

E. Provide any evidence and documentation to establish that the limitation(s) is applied no more stringently, as written and in operation, to mental health and substance use disorder benefits than to medical and surgical benefits.

Cigna does not exclude benefits for failure to complete treatment for M/S or MH/SUD Benefits. Cigna's process is consistent between M/S and MH/SUD, so Cigna does not apply such an NQTL to MH/SUD benefits that warrants analysis under the NQTL requirement.

12. <u>Restrictions that Limit Duration or Scope of Benefits for Services</u>

A. Provide the specific plan language for each NQTL in the above defined category and identify the medical/surgical and mental health and/or substance use disorder benefits to which it applies;

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Cigna has a National Network that includes providers within the	Cigna has a National Network that includes providers within the
United States. Cigna's policies do not cover anything other than	United States. Cigna's policies do not cover anything other than
urgent or emergent services if rendered outside of the United	urgent or emergent services if rendered outside of the United
States.	States.

B. Identify the factors used in the development of the limitation(s);

Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
Cigna has a National Network that includes providers within the	Cigna has a National Network that includes providers within the
United States. Cigna's policies do not cover anything other than	United States. Cigna's policies do not cover anything other than
urgent or emergent services if rendered outside of the United	urgent or emergent services if rendered outside of the United
States.	States.

C. Identify the sources (including any processes, strategies, or evidentiary standards) used to evaluate the factors identified above;

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Cigna has a National Network that includes providers within the	Cigna has a National Network that includes providers within the
United States. Cigna's policies do not cover anything other than	United States. Cigna's policies do not cover anything other than
urgent or emergent services if rendered outside of the United	urgent or emergent services if rendered outside of the United
States.	States.

D. Identify the methods and analysis used in the development of the limitation(s); and

Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
Cigna has a National Network that includes providers within the	Cigna has a National Network that includes providers within the
United States. Cigna's policies do not cover anything other than	United States. Cigna's policies do not cover anything other than

urgent or emergent services if rendered outside of the United	urgent or emergent services if rendered outside of the United
States.	States.

E. Provide any evidence and documentation to establish that the limitation(s) is applied no more stringently, as written and in operation, to mental health and substance use disorder benefits than to medical and surgical benefits.

Cigna's geographic limitations on coverage for services apply uniformly across MH/SUD and M/S benefits.

13. <u>Restrictions for Provider Specialty</u>

A. Provide the specific plan language for each NQTL in the above defined category and identify the medical/surgical and mental health and/or substance use disorder benefits to which it applies;

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Providers are required to work within the scope of their licenses.	Providers are required to work within the scope of their licenses.

B. Identify the factors used in the development of the limitation(s);

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Providers are required to work within the scope of their licenses.	Providers are required to work within the scope of their licenses.

C. Identify the sources (including any processes, strategies, or evidentiary standards) used to evaluate the factors identified above;

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Providers are required to work within the scope of their licenses.	Providers are required to work within the scope of their licenses.

D. Identify the methods and analysis used in the development of the limitation(s); and

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Providers are required to work within the scope of their licenses.	Providers are required to work within the scope of their licenses.

E. Provide any evidence and documentation to establish that the limitation(s) is applied no more stringently, as written and in operation, to mental health and substance use disorder benefits than to medical and surgical benefits.

Cigna requires providers to work within the scope of their licenses for both M/S and MH/SUD benefits. The process is consistent between M/S and MH/SUD benefits. Cigna does not, in writing or in operation, further restrict provision of MH/SUD benefits to certain types of specialties so long as the rendering provider is acting within the scope of the provider's license, and, in terms of stringency, Cigna confirms that it does not waive for any M/S providers the requirement that the M/S provider act within the scope of the provider's license in order for services to be covered.

14. <u>Reimbursement for INN Providers, OON Providers, INN Facilities, OON Facilities (separately)</u>

A. Provide the specific plan language for each NQTL in the above defined category and identify the medical/surgical and mental health and/or substance use disorder benefits to which it applies;

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
In-Network Providers (Office)	In-Network Providers (Office)
Medical/surgical in-network facility based services are reimbursed	MH/SUD in-network facility based services are reimbursed on a
on an assigned diagnosis-related group (DRG) or case rate basis	per diem basis based upon the competitive rate for the type of
and on a per diem basis.	service (level of care) or procedure with the geographic market.
In-Network Providers (All Other Outpatient Services) Medical/surgical in-network facility based services are reimbursed on an assigned diagnosis-related group (DRG) or case rate basis and on a per diem basis.	In-Network Providers (All Other Outpatient Services) MH/SUD in-network facility based services are reimbursed on a per diem basis based upon the competitive rate for the type of service (level of care) or procedure with the geographic market.
Out-of-Network Providers	Out-of-Network Providers
To calculate appropriate reimbursement levels for covered charges	To calculate appropriate reimbursement levels for covered charges
with out-of-network providers, each of which is often referred to	with out-of-network providers, each of which is often referred to

as the "allowed amount" for a covered service, Cigna first calculates on behalf of the plan sponsor the so-called "Maximum Reimbursable Charge" (MRC) for a covered service in one of several ways, which varies based on the plan sponsor's plan election. The MRC is calculated using one of two methodologies: MRC1 or MRC2. The methodologies, including their evidentiary standards and sources, are set forth immediately below. The MRC for any and all inpatient, outpatient, or emergency services is calculated consistently across MH/SUD and M/S benefits aligned to a classification, as reflected by the written methodology described in the benefit plans, which sets forth a broadly applicable methodology for MRC under the plan that does not distinguish between MH/SUD and M/S benefits rendered on an out-of-network basis.

In-Network Facilities

Medical/surgical in-network facility based services are reimbursed on an assigned diagnosis-related group (DRG) or case rate basis and on a per diem basis.

Out-of-Network Facilities

To calculate appropriate reimbursement levels for covered charges with out-of-network providers, each of which is often referred to as the "allowed amount" for a covered service, Cigna first calculates on behalf of the plan sponsor the so-called "Maximum Reimbursable Charge" (MRC) for a covered service in one of several ways, which varies based on the plan sponsor's plan election. The MRC is calculated using one of two methodologies: MRC1 or MRC2. The methodologies, including their evidentiary standards and sources, are set forth immediately below. The MRC for any and all inpatient, outpatient, or emergency services is calculated consistently across MH/SUD and M/S benefits aligned to a classification, as reflected by the written methodology described in the benefit plans, which sets forth a broadly applicable methodology for MRC under the plan that does not

as the "allowed amount" for a covered service, Cigna first calculates on behalf of the plan sponsor the so-called "Maximum Reimbursable Charge" (MRC) for a covered service in one of several ways, which varies based on the plan sponsor's plan election. The MRC is calculated using one of two methodologies: MRC1 or MRC2. The methodologies, including their evidentiary standards and sources, are set forth immediately below. The MRC for any and all inpatient, outpatient, or emergency services is calculated consistently across MH/SUD and M/S benefits aligned to a classification, as reflected by the written methodology described in the benefit plans, which sets forth a broadly applicable methodology for MRC under the plan that does not distinguish between MH/SUD and M/S benefits rendered on an out-of-network basis.

In-Network Facilities

MH/SUD in-network facility based services are reimbursed on a per diem basis based upon the competitive rate for the type of service (level of care) or procedure with the geographic market.

Out-of-Network Facilities

To calculate appropriate reimbursement levels for covered charges with out-of-network providers, each of which is often referred to as the "allowed amount" for a covered service, Cigna first calculates on behalf of the plan sponsor the so-called "Maximum Reimbursable Charge" (MRC) for a covered service in one of several ways, which varies based on the plan sponsor's plan election. The MRC is calculated using one of two methodologies: MRC1 or MRC2. The methodologies, including their evidentiary standards and sources, are set forth immediately below. The MRC for any and all inpatient, outpatient, or emergency services is calculated consistently across MH/SUD and M/S benefits aligned to a classification, as reflected by the written methodology described in the benefit plans, which sets forth a broadly applicable methodology for MRC under the plan that does not

distinguish between MH/SUD and M/S benefits rendered on an	distinguish between MH/SUD and M/S benefits rendered on an
out-of-network basis.	out-of-network basis.

B. Identify the factors used in the development of the limitation(s);

Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
 In-Network Providers (Office) Cigna's in-network provider reimbursement methodology for M/S and MH/SUD providers are based upon the same array of factors including, but not limited to: Geographic market (i.e. market rate and payment type for provider type and/or specialty) Type of provider (i.e. hospital, clinic and practitioner) and/or specialty Supply of provider type and/or specialty Network need and/or demand for provider type and/or specialty Medicare reimbursement rates Training, experience and licensure of provider 	 In-Network Providers (Office) Cigna's in-network provider reimbursement methodology for M/S and MH/SUD providers are based upon the same array of factors including, but not limited to: Geographic market (i.e. market rate and payment type for provider type and/or specialty) Type of provider (i.e. hospital, clinic and practitioner) and/or specialty Supply of provider type and/or specialty Network need and/or demand for provider type and/or specialty Medicare reimbursement rates Training, experience and licensure of provider
 In-Network Providers (All Other Outpatient Services) Cigna's in-network provider reimbursement methodology for M/S and MH/SUD providers are based upon the same array of factors including, but not limited to: Geographic market (i.e. market rate and payment type for provider type and/or specialty) Type of provider (i.e. hospital, clinic and practitioner) and/or specialty Supply of provider type and/or specialty Network need and/or demand for provider type and/or specialty Medicare reimbursement rates Training, experience and licensure of provider 	 In-Network Providers (All Other Outpatient Services) Cigna's in-network provider reimbursement methodology for M/S and MH/SUD providers are based upon the same array of factors including, but not limited to: Geographic market (i.e. market rate and payment type for provider type and/or specialty) Type of provider (i.e. hospital, clinic and practitioner) and/or specialty Supply of provider type and/or specialty Network need and/or demand for provider type and/or specialty Medicare reimbursement rates Training, experience and licensure of provider

Out-of-Network Providers	Out-of-Network Providers
Maximum Reimbursable Charge – MRC1	Maximum Reimbursable Charge – MRC1
Under MRC1, the plan applies to a covered inpatient or outpatient service a plan-sponsor-elected percentile to a charge (often referred to as a "U&C" charge) as compiled in a national charges database. The charges in the database are specific to the service in question and are derived from charges submitted by providers located in the claimant provider's geographic area, specifically zip codes, if a charge for the zip code is available, in which the claimant provider resides. That is, the evidentiary standard for the out-of-network allowable amount is the charge set forth in a national charges database for the service in the geographic area of the claimant provider that aligns with the percentile elected by the client. Plan sponsors may select one of several possible MRC1 percentiles to apply to the applicable charge; these percentiles,	Under MRC1, the plan applies to a covered inpatient or outpatient service a plan-sponsor-elected percentile to a charge (often referred to as a "U&C" charge) as compiled in a national charges database. The charges in the database are specific to the service in question and are derived from charges submitted by providers located in the claimant provider's geographic area, specifically zip codes, if a charge for the zip code is available, in which the claimant provider resides. That is, the evidentiary standard for the out-of-network allowable amount is the charge set forth in a national charges database for the service in the geographic area of the claimant provider that aligns with the percentile elected by the client. Plan sponsors may select one of several possible MRC1 percentiles to apply to the applicable charge; these percentiles,
which vary by plan, include as follows: 50th percentile, 60th	which vary by plan, include as follows: 50th percentile, 60th
percentile, 70th percentile, 80th percentile, etc.	percentile, 70th percentile, 80th percentile, etc.
The standard benefit language incorporated into many plan sponsors' benefit plans to describe MRC1 is as follows, and excerpted as relevant:	The standard benefit language incorporated into many plan sponsors' benefit plans to describe MRC1 is as follows, and excerpted as relevant:
"The Maximum Reimbursable Charge for covered services is determined based on the lesser of:	"The Maximum Reimbursable Charge for covered services is determined based on the lesser of:
 the health care professional's normal charge for a similar service or supply; or a policyholder-selected percentile of charges made by 	 the health care professional's normal charge for a similar service or supply; or a policyholder-selected percentile of charges made by
health care professionals of such service or supply in the geographic area where it is received as compiled in a	health care professionals of such service or supply in the geographic area where it is received as compiled in a
database selected by Cigna. If sufficient charge data is	database selected by Cigna. If sufficient charge data is
unavailable in the database for that geographic area to	unavailable in the database for that geographic area to
determine the Maximum Reimbursable Charge, then state,	determine the Maximum Reimbursable Charge, then state,
regional or national charge data may be used. If sufficient	regional or national charge data may be used. If sufficient
charge data is unavailable in the database for that	charge data is unavailable in the database for that

geographic area to determine the Maximum Reimbursable	geographic area to determine the Maximum Reimbursable
Charge, then data in the database that is derived from	Charge, then data in the database that is derived from
charges for other for similar services may be used.	charges for other for similar services may be used.
The percentile used to determine the Maximum Reimbursable	The percentile used to determine the Maximum Reimbursable
Charge is listed in The Schedule."	Charge is listed in The Schedule."
Maximum Reimbursable Charge – MRC2	Maximum Reimbursable Charge – MRC2
Under MRC2, the plan applies to a covered inpatient or outpatient	Under MRC2, the plan applies to a covered inpatient or outpatient
service a percentage of a charge based on a methodology similar	service a percentage of a charge based on a methodology similar
to that used by CMS to pay Medicare claims, in which a charge is	to that used by CMS to pay Medicare claims, in which a charge is
derived similarly to CMS' fee schedule methodology in that	derived similarly to CMS' fee schedule methodology in that
factors like service type, place of service, and geographic location	factors like service type, place of service, and geographic location
impact the charge used to calculate the MRC, which are defined	impact the charge used to calculate the MRC, which are defined
generally by reference to CMS' fee schedule methodology. Most	generally by reference to CMS' fee schedule methodology. Most
of CMS' methodologies adjust payments based on regional costs	of CMS' methodologies adjust payments based on regional costs
and whether the claimant is a practitioner or a facility.	and whether the claimant is a practitioner or a facility.
Specifically, physician fees are adjusted based on the geographic	Specifically, physician fees are adjusted based on the geographic
practice cost index (GPCI) in about 100 localities, and institutional	practice cost index (GPCI) in about 100 localities, and institutional
payments are adjusted for wage variations in about 200 core-based	payments are adjusted for wage variations in about 200 core-based
statistical areas (CBSA). Additionally, durable medical equipment	statistical areas (CBSA). Additionally, durable medical equipment
(DME) and lab fees are adjusted by state, and ambulance fees are	(DME) and lab fees are adjusted by state, and ambulance fees are
adjusted by GPCI and by the degree of urbanization.	adjusted by GPCI and by the degree of urbanization.
MRC2 rate updates occur in response to CMS changes	MRC2 rate updates occur in response to CMS changes
reimbursement methodologies or releases new fee schedules;	reimbursement methodologies or releases new fee schedules;
Cigna updates its MRC2 fee schedule used to administer plan	Cigna updates its MRC2 fee schedule used to administer plan
benefits as soon as practicable following release of CMS changes.	benefits as soon as practicable following release of CMS changes.
Plan sponsor clients can select the percentage of MRC2 paid to	Plan sponsor clients can select the percentage of MRC2 paid to
out-of-network health care providers for non-emergency services.	out-of-network health care providers for non-emergency services.
The standard percentages, subject to plan sponsor client election,	The standard percentages, subject to plan sponsor client election,
applied to the MRC for a service are: 110 percent, 150 percent,	applied to the MRC for a service are: 110 percent, 150 percent,
200 percent, and 300 percent.	200 percent, and 300 percent.

In the absence of a Medicare Fee Schedule rate for a service (e.g. a service Medicare does not cover), Cigna applies a reimbursement rate derived from a methodology similar to the ones used by Medicare.	In the absence of a Medicare Fee Schedule rate for a service (e.g. a service Medicare does not cover), Cigna applies a reimbursement rate derived from a methodology similar to the ones used by Medicare.
The standard benefit language incorporated into many plan sponsors' benefit plans to describe MRC2 is as follows, and excerpted as relevant:	The standard benefit language incorporated into many plan sponsors' benefit plans to describe MRC2 is as follows, and excerpted as relevant:
 "The Maximum Reimbursable Charge for covered services is determined based on the lesser of: the health care professional's normal charge for a similar service or supply; or a policyholder-selected percentage of a schedule developed by CG that is based upon a methodology similar to a methodology utilized by Medicare to determine the allowable fee for the same or similar service within the geographic market. 	 "The Maximum Reimbursable Charge for covered services is determined based on the lesser of: the health care professional's normal charge for a similar service or supply; or a policyholder-selected percentage of a schedule developed by CG that is based upon a methodology similar to a methodology utilized by Medicare to determine the allowable fee for the same or similar service within the geographic market.
The percentage used to determine the Maximum Reimbursable Charge is listed in The Schedule.	The percentage used to determine the Maximum Reimbursable Charge is listed in The Schedule.
 In some cases, a Medicare based schedule will not be used and the Maximum Reimbursable Charge for covered services is determined based on the lesser of: the health care professional's normal charge for a similar service or supply; or the 80th percentile of charges made by health care professionals of such service or supply in the geographic area where it is received as compiled in a database selected by Cigna. If sufficient charge data is unavailable in the database for that geographic area to determine the Maximum Reimbursable Charge, then data in the database 	 In some cases, a Medicare based schedule will not be used and the Maximum Reimbursable Charge for covered services is determined based on the lesser of: the health care professional's normal charge for a similar service or supply; or the 80th percentile of charges made by health care professionals of such service or supply in the geographic area where it is received as compiled in a database selected by Cigna. If sufficient charge data is unavailable in the database for that geographic area to determine the Maximum Reimbursable Charge, then data in the database

that is derived from charges for other for similar services may be used."

For emergency services, under either the MRC1 or MRC2 methodologies, and consistent with the Affordable Care Act, Cigna-administered plans agree to pay to an out-of-network provider the greatest of the following amounts:

- (1) The median amount negotiated with in-network providers for the emergency service;
- (2) The amount for the emergency service calculated using the same method the plan generally uses to determine payments for out-of-network services (such as the usual, customary, and reasonable amount); or
- (3) The amount that would be paid under Medicare for the emergency service (minimum payment standards).

In-Network Facilities

Cigna's in-network provider reimbursement methodology for M/S and MH/SUD providers are based upon the same array of factors including, but not limited to:

- Geographic market (i.e. market rate and payment type for provider type and/or specialty)
- Type of provider (i.e. hospital, clinic and practitioner) and/or specialty
- Supply of provider type and/or specialty
- Network need and/or demand for provider type and/or specialty
- Medicare reimbursement rates
- Training, experience and licensure of provider

Out-of-Network Facilities

Maximum Reimbursable Charge – MRC1

that is derived from charges for other for similar services may be used."

For emergency services, under either the MRC1 or MRC2 methodologies, and consistent with the Affordable Care Act, Cigna-administered plans agree to pay to an out-of-network provider the greatest of the following amounts:

- (4) The median amount negotiated with in-network providers for the emergency service;
- (5) The amount for the emergency service calculated using the same method the plan generally uses to determine payments for out-of-network services (such as the usual, customary, and reasonable amount); or
- (6) The amount that would be paid under Medicare for the emergency service (minimum payment standards).

In-Network Facilities

Cigna's in-network provider reimbursement methodology for M/S and MH/SUD providers are based upon the same array of factors including, but not limited to:

- Geographic market (i.e. market rate and payment type for provider type and/or specialty)
- Type of provider (i.e. hospital, clinic and practitioner) and/or specialty
- Supply of provider type and/or specialty
- Network need and/or demand for provider type and/or specialty
- Medicare reimbursement rates
- Training, experience and licensure of provider

Out-of-Network Facilities

Maximum Reimbursable Charge – MRC1

Under MRC1, the plan applies to a covered inpatient or outpatient	Under MRC1, the plan applies to a covered inpatient or outpatient
service a plan-sponsor-elected percentile to a charge (often	service a plan-sponsor-elected percentile to a charge (often

referred to as a "U&C" charge) as compiled in a national charges	referred to as a "U&C" charge) as compiled in a national charges
database. The charges in the database are specific to the service in	database. The charges in the database are specific to the service in
question and are derived from charges submitted by providers	question and are derived from charges submitted by providers
located in the claimant provider's geographic area, specifically zip	located in the claimant provider's geographic area, specifically zip
codes, if a charge for the zip code is available, in which the	codes, if a charge for the zip code is available, in which the
claimant provider resides. That is, the evidentiary standard for the	claimant provider resides. That is, the evidentiary standard for the
out-of-network allowable amount is the charge set forth in a	out-of-network allowable amount is the charge set forth in a
national charges database for the service in the geographic area of	national charges database for the service in the geographic area of
the claimant provider that aligns with the percentile elected by the	the claimant provider that aligns with the percentile elected by the
client. Plan sponsors may select one of several possible MRC1	client. Plan sponsors may select one of several possible MRC1
percentiles to apply to the applicable charge; these percentiles,	percentiles to apply to the applicable charge; these percentiles,
which vary by plan, include as follows: 50th percentile, 60th	which vary by plan, include as follows: 50th percentile, 60th
percentile, 70th percentile, 80th percentile, etc.	percentile, 70th percentile, 80th percentile, etc.
The standard benefit language incorporated into many plan	The standard benefit language incorporated into many plan
sponsors' benefit plans to describe MRC1 is as follows, and	sponsors' benefit plans to describe MRC1 is as follows, and
excerpted as relevant:	excerpted as relevant:
"The Maximum Reimbursable Charge for covered services is	"The Maximum Reimbursable Charge for covered services is
determined based on the lesser of:	determined based on the lesser of:
• the health care professional's normal charge for a similar service or supply; or	• the health care professional's normal charge for a similar service or supply; or
 a policyholder-selected percentile of charges made by 	 a policyholder-selected percentile of charges made by
health care professionals of such service or supply in the	health care professionals of such service or supply in the
geographic area where it is received as compiled in a	geographic area where it is received as compiled in a
database selected by Cigna. If sufficient charge data is	database selected by Cigna. If sufficient charge data is
unavailable in the database for that geographic area to	unavailable in the database for that geographic area to
determine the Maximum Reimbursable Charge, then state,	determine the Maximum Reimbursable Charge, then state,
regional or national charge data may be used. If sufficient	regional or national charge data may be used. If sufficient
charge data is unavailable in the database for that	charge data is unavailable in the database for that
geographic area to determine the Maximum Reimbursable	geographic area to determine the Maximum Reimbursable
Charge, then data in the database that is derived from	Charge, then data in the database that is derived from
charges for other for similar services may be used.	charges for other for similar services may be used.

The percentile used to determine the Maximum Reimbursable	The percentile used to determine the Maximum Reimbursable
Charge is listed in The Schedule."	Charge is listed in The Schedule."
Maximum Reimbursable Charge – MRC2	Maximum Reimbursable Charge – MRC2
Under MRC2, the plan applies to a covered inpatient or outpatient service a percentage of a charge based on a methodology similar to that used by CMS to pay Medicare claims, in which a charge is derived similarly to CMS' fee schedule methodology in that factors like service type, place of service, and geographic location impact the charge used to calculate the MRC, which are defined generally by reference to CMS' fee schedule methodology. Most of CMS' methodologies adjust payments based on regional costs and whether the claimant is a practitioner or a facility.	Under MRC2, the plan applies to a covered inpatient or outpatient service a percentage of a charge based on a methodology similar to that used by CMS to pay Medicare claims, in which a charge is derived similarly to CMS' fee schedule methodology in that factors like service type, place of service, and geographic location impact the charge used to calculate the MRC, which are defined generally by reference to CMS' fee schedule methodology. Most of CMS' methodologies adjust payments based on regional costs and whether the claimant is a practitioner or a facility.
Specifically, physician fees are adjusted based on the geographic practice cost index (GPCI) in about 100 localities, and institutional payments are adjusted for wage variations in about 200 core-based statistical areas (CBSA). Additionally, durable medical equipment (DME) and lab fees are adjusted by state, and ambulance fees are adjusted by GPCI and by the degree of urbanization.	Specifically, physician fees are adjusted based on the geographic practice cost index (GPCI) in about 100 localities, and institutional payments are adjusted for wage variations in about 200 core-based statistical areas (CBSA). Additionally, durable medical equipment (DME) and lab fees are adjusted by state, and ambulance fees are adjusted by GPCI and by the degree of urbanization.
MRC2 rate updates occur in response to CMS changes reimbursement methodologies or releases new fee schedules; Cigna updates its MRC2 fee schedule used to administer plan benefits as soon as practicable following release of CMS changes.	MRC2 rate updates occur in response to CMS changes reimbursement methodologies or releases new fee schedules; Cigna updates its MRC2 fee schedule used to administer plan benefits as soon as practicable following release of CMS changes.
Plan sponsor clients can select the percentage of MRC2 paid to out-of-network health care providers for non-emergency services. The standard percentages, subject to plan sponsor client election, applied to the MRC for a service are: 110 percent, 150 percent, 200 percent, and 300 percent.	Plan sponsor clients can select the percentage of MRC2 paid to out-of-network health care providers for non-emergency services. The standard percentages, subject to plan sponsor client election, applied to the MRC for a service are: 110 percent, 150 percent, 200 percent, and 300 percent.
In the absence of a Medicare Fee Schedule rate for a service (e.g. a service Medicare does not cover), Cigna applies a reimbursement	In the absence of a Medicare Fee Schedule rate for a service (e.g. a service Medicare does not cover), Cigna applies a reimbursement

rate derived from a methodology similar to the ones used by	rate derived from a methodology similar to the ones used by
Medicare.	Medicare.
The standard benefit language incorporated into many plan	The standard benefit language incorporated into many plan
sponsors' benefit plans to describe MRC2 is as follows, and	sponsors' benefit plans to describe MRC2 is as follows, and
excerpted as relevant:	excerpted as relevant:
 "The Maximum Reimbursable Charge for covered services is determined based on the lesser of: the health care professional's normal charge for a similar service or supply; or a policyholder-selected percentage of a schedule developed by CG that is based upon a methodology similar to a methodology utilized by Medicare to determine the allowable fee for the same or similar service within the geographic market. 	 "The Maximum Reimbursable Charge for covered services is determined based on the lesser of: the health care professional's normal charge for a similar service or supply; or a policyholder-selected percentage of a schedule developed by CG that is based upon a methodology similar to a methodology utilized by Medicare to determine the allowable fee for the same or similar service within the geographic market.
The percentage used to determine the Maximum Reimbursable	The percentage used to determine the Maximum Reimbursable
Charge is listed in The Schedule.	Charge is listed in The Schedule.
 In some cases, a Medicare based schedule will not be used and the Maximum Reimbursable Charge for covered services is determined based on the lesser of: the health care professional's normal charge for a similar service or supply; or the 80th percentile of charges made by health care professionals of such service or supply in the geographic area where it is received as compiled in a database selected by Cigna. If sufficient charge data is unavailable in the database for that geographic area to determine the Maximum Reimbursable Charge, then data in the database that is derived from charges for other for similar services may be used." 	 In some cases, a Medicare based schedule will not be used and the Maximum Reimbursable Charge for covered services is determined based on the lesser of: the health care professional's normal charge for a similar service or supply; or the 80th percentile of charges made by health care professionals of such service or supply in the geographic area where it is received as compiled in a database selected by Cigna. If sufficient charge data is unavailable in the database for that geographic area to determine the Maximum Reimbursable Charge, then data in the database that is derived from charges for other for similar services may be used."

For emergency services, under either the MRC1 or MRC2	For emergency services, under either the MRC1 or MRC2
methodologies, and consistent with the Affordable Care Act,	methodologies, and consistent with the Affordable Care Act,
Cigna-administered plans agree to pay to an out-of-network	Cigna-administered plans agree to pay to an out-of-network
provider the greatest of the following amounts:	provider the greatest of the following amounts:
(1) The median amount negotiated with in-network	(4) The median amount negotiated with in-network
providers for the emergency service;	providers for the emergency service;
(2) The amount for the emergency service calculated	(5) The amount for the emergency service calculated
using the same method the plan generally uses to	using the same method the plan generally uses to
determine payments for out-of-network services (such	determine payments for out-of-network services (such
as the usual, customary, and reasonable amount); or	as the usual, customary, and reasonable amount); or
(3) The amount that would be paid under Medicare for	The amount that would be paid under Medicare for the emergency
the emergency service (minimum payment standards).	service (minimum payment standards).

Medical/Surgical Benefits (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
In-Network Providers (Office)	In-Network Providers (Office)
Cigna's in-network provider reimbursement methodology is based	Cigna's in-network provider reimbursement methodology is based
upon factors including, but not limited to: geographic market (i.e.	upon factors including, but not limited to: geographic market (i.e.
market rate and payment type for provider type and/or specialty);	market rate and payment type for provider type and/or specialty);
type of provider (i.e. hospital, clinic and practitioner) and/or	type of provider (i.e. hospital, clinic and practitioner) and/or
specialty; supply of provider type and/or specialty; network	specialty; supply of provider type and/or specialty; network
adequacy and current Medicare reimbursement rates. All staff	adequacy and current Medicare reimbursement rates. All staff
participating in a contract negotiation are trained on internal Cigna	participating in a contract negotiation are trained on internal Cigna
policies and procedures, and have access to necessary tools to	policies and procedures, and have access to necessary tools to
negotiate and develop appropriate reimbursement rates based on	negotiate and develop appropriate reimbursement rates based on
standard methodologies, provider specific reimbursement requests	standard methodologies, provider specific reimbursement requests
and escalate for justification and approval of any deviations.	and escalate for justification and approval of any deviations.
In-Network Providers (All Other Outpatient Services)	In-Network Providers (All Other Outpatient Services)
Cigna's in-network provider reimbursement methodology is based	Cigna's in-network provider reimbursement methodology is based
upon factors including, but not limited to: geographic market (i.e.	upon factors including, but not limited to: geographic market (i.e.
market rate and payment type for provider type and/or specialty);	market rate and payment type for provider type and/or specialty);
type of provider (i.e. hospital, clinic and practitioner) and/or	type of provider (i.e. hospital, clinic and practitioner) and/or
specialty; supply of provider type and/or specialty; network	specialty; supply of provider type and/or specialty; network

C. Identify the sources (including any processes, strategies, or evidentiary standards) used to evaluate the factors identified above;

adequacy and current Medicare reimbursement rates. All staff adequacy and current Medicare reimbursement rates. All staff participating in a contract negotiation are trained on internal Cigna policies and procedures, and have access to necessary tools to negotiate and develop appropriate reimbursement rates based on standard methodologies, provider specific reimbursement requests and escalate for justification and approval of any deviations. **Out-of-Network Providers**

In addition to calculating an MRC for a covered service, Cigna also identifies whether it has access to an acceptable arrangement with an out-of-network health care provider whereby the out-ofnetwork health care provider has agreed, or ultimately agrees, to accept the rate in question as payment in full for the services rendered to a plan enrollee and, consequently, not charge the

enrollee any amount in excess of the plan cost-sharing for the outof-network services. While the health care provider in this scenario remains out-of-network with the plan, in the event such an indirect rate arrangement is used to assess the allowable charges for the out-of-network service, the enrollee is protected by virtue of the contract between the provider and vendor from potential balance-billing of amounts in excess of the plan's allowable charges. The plan accesses these rate arrangements indirectly through Cigna's contracts with third party vendors, which in turn have contracts with, or enter into claim-specific rate arrangements with, a number of MH/SUD and M/S providers. Where available, these rates – which are derived from either proprietary databases that compile charges from that provider and/or similar providers performing similar services in similar geographies, or claim-specific pricing where such rates are not available – vary by provider type (i.e., facility v. physician practitioner v. non-physician practitioner), service type (i.e., CPT codes), and geography, as the costs of rendering services vary based on these factors. If such an indirect rate arrangement does not exist, cannot be obtained, or is unacceptable, as the case may be, then the reimbursement amount payable for services rendered

participating in a contract negotiation are trained on internal Cigna policies and procedures, and have access to necessary tools to negotiate and develop appropriate reimbursement rates based on standard methodologies, provider specific reimbursement requests and escalate for justification and approval of any deviations.

Out-of-Network Providers

In addition to calculating an MRC for a covered service, Cigna also identifies whether it has access to an acceptable arrangement with an out-of-network health care provider whereby the out-ofnetwork health care provider has agreed, or ultimately agrees, to accept the rate in question as payment in full for the services rendered to a plan enrollee and, consequently, not charge the enrollee any amount in excess of the plan cost-sharing for the outof-network services. While the health care provider in this scenario remains out-of-network with the plan, in the event such an indirect rate arrangement is used to assess the allowable charges for the out-of-network service, the enrollee is protected by virtue of the contract between the provider and vendor from potential balance-billing of amounts in excess of the plan's allowable charges. The plan accesses these rate arrangements indirectly through Cigna's contracts with third party vendors, which in turn have contracts with, or enter into claim-specific rate arrangements with, a number of MH/SUD and M/S providers. Where available, these rates – which are derived from either proprietary databases that compile charges from that provider and/or similar providers performing similar services in similar geographies, or claim-specific pricing where such rates are not available - vary by provider type (i.e., facility v. physician practitioner v. non-physician practitioner), service type (i.e., CPT codes), and geography, as the costs of rendering services vary based on these factors. If such an indirect rate arrangement does not exist, cannot be obtained, or is unacceptable, as the case may be, then the reimbursement amount payable for services rendered

by the out-of-network provider is, again, equal to the lesser of (I)	by the out-of-network provider is, again, equal to the lesser of (I)
the covered billed charges submitted by the provider or (ii) the	the covered billed charges submitted by the provider or (ii) the
percentile of the service's MRC set forth in the plan.	percentile of the service's MRC set forth in the plan.
In the absence of such an acceptable rate arrangement, and as	In the absence of such an acceptable rate arrangement, and as
previously noted, the plan agrees to pay a benefit equal to the	previously noted, the plan agrees to pay a benefit equal to the
lesser of the billed charges or the client-elected Maximum	lesser of the billed charges or the client-elected Maximum
Reimbursable Charge for the covered services, which, as	Reimbursable Charge for the covered services, which, as
described, above, is calculated based on the Maximum	described, above, is calculated based on the Maximum
Reimbursable Charge methodology selected by the plan.	Reimbursable Charge methodology selected by the plan.
In-Network Facilities	In-Network Facilities
Cigna's in-network provider reimbursement methodology is based	Cigna's in-network provider reimbursement methodology is based
upon factors including, but not limited to: geographic market (i.e.	upon factors including, but not limited to: geographic market (i.e.
market rate and payment type for provider type and/or specialty);	market rate and payment type for provider type and/or specialty);
type of provider (i.e. hospital, clinic and practitioner) and/or	type of provider (i.e. hospital, clinic and practitioner) and/or
specialty; supply of provider type and/or specialty; network	specialty; supply of provider type and/or specialty; network
adequacy and current Medicare reimbursement rates. All staff	adequacy and current Medicare reimbursement rates. All staff
participating in a contract negotiation are trained on internal Cigna	participating in a contract negotiation are trained on internal Cigna
policies and procedures, and have access to necessary tools to	policies and procedures, and have access to necessary tools to
negotiate and develop appropriate reimbursement rates based on	negotiate and develop appropriate reimbursement rates based on
standard methodologies, provider specific reimbursement requests	standard methodologies, provider specific reimbursement requests
and escalate for justification and approval of any deviations.	and escalate for justification and approval of any deviations.
Out-of-Network Facilities	Out-of-Network Facilities
In addition to calculating an MRC for a covered service, Cigna	In addition to calculating an MRC for a covered service, Cigna
also identifies whether it has access to an acceptable arrangement	also identifies whether it has access to an acceptable arrangement
with an out-of-network health care provider whereby the out-of-	with an out-of-network health care provider whereby the out-of-
network health care provider has agreed, or ultimately agrees, to	network health care provider has agreed, or ultimately agrees, to
accept the rate in question as payment in full for the services	accept the rate in question as payment in full for the services
rendered to a plan enrollee and, consequently, not charge the	rendered to a plan enrollee and, consequently, not charge the
enrollee any amount in excess of the plan cost-sharing for the out-	enrollee any amount in excess of the plan cost-sharing for the out-
of-network services. While the health care provider in this	of-network services. While the health care provider in this
scenario remains out-of-network with the plan, in the event such	scenario remains out-of-network with the plan, in the event such
an indirect rate arrangement is used to assess the allowable	an indirect rate arrangement is used to assess the allowable

D. Identify the methods and analysis used in the development of the limitation(s); and

Medical/Surgical Benefits	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
In-Network Providers (Office)	In-Network Providers (Office)
Standard reimbursement rates for inpatient and outpatient services	Standard reimbursement rates for inpatient and outpatient services
for both M/S and MH/SUD providers are set based upon standard	for both M/S and MH/SUD providers are set based upon standard
fee schedules, which are developed for facilities, physicians and	fee schedules, which are developed for facilities, physicians and

non-physicians by state or region and reflect geographic variations	non-physicians by state or region and reflect geographic variations
within that state or region. Provider-specific fee schedules are	within that state or region. Provider-specific fee schedules are
developed based upon the professional or facility's negotiation	developed based upon the professional or facility's negotiation
request or business need, including the satisfaction of network	request or business need, including the satisfaction of network
adequacy requirements.	adequacy requirements.
In-network facility-based services which are not reimbursed on an assigned diagnosis-related group (DRG) or case rate basis may generally be reimbursed on a per diem or discount basis. MH/SUD in-network facility-based services are only reimbursed on a per diem basis, and do not include DRG or case rate reimbursement. Per diem reimbursement for both M/S and MH/SUD facility-based services are based upon the following factors and accompanying evidentiary standards: (1) geographic market, which may be adjusted based upon Medicare Geographical Practice Cost Index ("GPCI"); (2) type of provider and/or specialty (e.g. physician practitioner v. non-physician practitioner v. facility); (3) supply of provider type and/or specialty; (4) network need and/or demand for provider type and/or specialty; (5) Medicare reimbursement rates for codes with assigned Medicare Relative Value Unit ("RVU"); and (6) Training, experience and licensure of providers billing for professional services under the facility agreement.	In-network facility-based services which are not reimbursed on an assigned diagnosis-related group (DRG) or case rate basis may generally be reimbursed on a per diem or discount basis. MH/SUD in-network facility-based services are only reimbursed on a per diem basis, and do not include DRG or case rate reimbursement. Per diem reimbursement for both M/S and MH/SUD facility-based services are based upon the following factors and accompanying evidentiary standards: (1) geographic market, which may be adjusted based upon Medicare Geographical Practice Cost Index ("GPCI"); (2) type of provider and/or specialty (e.g. physician practitioner v. non-physician practitioner v. facility); (3) supply of provider type and/or specialty; (4) network need and/or demand for provider type and/or specialty; (5) Medicare reimbursement rates for codes with assigned Medicare Relative Value Unit ("RVU"); and (6) Training, experience and licensure of providers billing for professional services under the facility agreement.
In-Network Providers (All Other Outpatient Services)	In-Network Providers (All Other Outpatient Services)
Standard reimbursement rates for outpatient services for both M/S	Standard reimbursement rates for outpatient services for both M/S
and MH/SUD providers are set based upon standard fee schedules,	and MH/SUD providers are set based upon standard fee schedules,
which are developed for facilities, physicians and non-physicians	which are developed for facilities, physicians and non-physicians
by state or region and reflect geographic variations within that	by state or region and reflect geographic variations within that
state or region. Provider-specific fee schedules are developed	state or region. Provider-specific fee schedules are developed
based upon the professional or facility's negotiation request or	based upon the professional or facility's negotiation request or
business need, including the satisfaction of network adequacy	business need, including the satisfaction of network adequacy
requirements.	requirements.

In-network facility-based services which are not reimbursed on an assigned diagnosis-related group (DRG) or case rate basis may generally be reimbursed on a per diem or discount basis. MH/SUD in-network facility-based services are only reimbursed on a per diem basis, and do not include DRG or case rate reimbursement. Per diem reimbursement for both M/S and MH/SUD facility-based services are based upon the following factors and accompanying evidentiary standards: (1) geographic market, which may be adjusted based upon Medicare Geographical Practice Cost Index ("GPCI"); (2) type of provider and/or specialty (e.g. physician practitioner v. non-physician practitioner v. facility); (3) supply of provider type and/or specialty; (4) network need and/or demand for provider type and/or specialty; (5) Medicare reimbursement rates for codes with assigned Medicare Relative Value Unit ("RVU"); and (6) Training, experience and licensure of providers billing for professional services under the facility agreement.

Out-of-Network Providers

In addition to calculating an MRC for a covered service, Cigna also identifies whether it has access to an acceptable arrangement with an out-of-network health care provider whereby the out-ofnetwork health care provider has agreed, or ultimately agrees, to accept the rate in question as payment in full for the services rendered to a plan enrollee and, consequently, not charge the enrollee any amount in excess of the plan cost-sharing for the outof-network services. While the health care provider in this scenario remains out-of-network with the plan, in the event such an indirect rate arrangement is used to assess the allowable charges for the out-of-network service, the enrollee is protected by virtue of the contract between the provider and vendor from potential balance-billing of amounts in excess of the plan's allowable charges. The plan accesses these rate arrangements indirectly through Cigna's contracts with third party vendors, which in turn have contracts with, or enter into claim-specific rate

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arrangements with, a number of MH/SUD and M/S providers. Where available, these rates – which are derived from either proprietary databases that compile charges from that provider and/or similar providers performing similar services in similar geographies, or claim-specific pricing where such rates are not available – vary by provider type (i.e., facility v. physician practitioner v. non-physician practitioner), service type (i.e., CPT codes), and geography, as the costs of rendering services vary based on these factors. If such an indirect rate arrangement does not exist, cannot be obtained, or is unacceptable, as the case may be, then the reimbursement amount payable for services rendered by the out-of-network provider is, again, equal to the lesser of (I) the covered billed charges submitted by the provider or (ii) the percentile of the service's MRC set forth in the plan.

In the absence of such an acceptable rate arrangement, and as previously noted, the plan agrees to pay a benefit equal to the lesser of the billed charges or the client-elected Maximum Reimbursable Charge for the covered services, which, as described, above, is calculated based on the Maximum Reimbursable Charge methodology selected by the plan.

In-Network Facilities

Standard reimbursement rates for inpatient and outpatient services for both M/S and MH/SUD providers are set based upon standard fee schedules, which are developed for facilities, physicians and non-physicians by state or region and reflect geographic variations within that state or region. Provider-specific fee schedules are developed based upon the professional or facility's negotiation request or business need, including the satisfaction of network adequacy requirements.

In-network facility-based services which are not reimbursed on an assigned diagnosis-related group (DRG) or case rate basis may generally be reimbursed on a per diem or discount basis.

arrangements with, a number of MH/SUD and M/S providers. Where available, these rates – which are derived from either proprietary databases that compile charges from that provider and/or similar providers performing similar services in similar geographies, or claim-specific pricing where such rates are not available – vary by provider type (i.e., facility v. physician practitioner v. non-physician practitioner), service type (i.e., CPT codes), and geography, as the costs of rendering services vary based on these factors. If such an indirect rate arrangement does not exist, cannot be obtained, or is unacceptable, as the case may be, then the reimbursement amount payable for services rendered by the out-of-network provider is, again, equal to the lesser of (I) the covered billed charges submitted by the provider or (ii) the percentile of the service's MRC set forth in the plan.

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In-network facility-based services which are not reimbursed on an assigned diagnosis-related group (DRG) or case rate basis may generally be reimbursed on a per diem or discount basis.

MH/SUD in-network facility-based services are only reimbursed on a per diem basis, and do not include DRG or case rate reimbursement. Per diem reimbursement for both M/S and MH/SUD facility-based services are based upon the following factors and accompanying evidentiary standards: (1) geographic market, which may be adjusted based upon Medicare Geographical Practice Cost Index ("GPCI"); (2) type of provider and/or specialty (e.g. physician practitioner v. non-physician practitioner v. facility); (3) supply of provider type and/or specialty; (4) network need and/or demand for provider type and/or specialty; (5) Medicare reimbursement rates for codes with assigned Medicare Relative Value Unit ("RVU"); and (6) Training, experience and licensure of providers billing for professional services under the facility agreement.

Out-of-Network Facilities

In addition to calculating an MRC for a covered service, Cigna also identifies whether it has access to an acceptable arrangement with an out-of-network health care provider whereby the out-ofnetwork health care provider has agreed, or ultimately agrees, to accept the rate in question as payment in full for the services rendered to a plan enrollee and, consequently, not charge the enrollee any amount in excess of the plan cost-sharing for the outof-network services. While the health care provider in this scenario remains out-of-network with the plan, in the event such an indirect rate arrangement is used to assess the allowable charges for the out-of-network service, the enrollee is protected by virtue of the contract between the provider and vendor from potential balance-billing of amounts in excess of the plan's allowable charges. The plan accesses these rate arrangements indirectly through Cigna's contracts with third party vendors, which in turn have contracts with, or enter into claim-specific rate arrangements with, a number of MH/SUD and M/S providers. Where available, these rates – which are derived from either proprietary databases that compile charges from that provider

MH/SUD in-network facility-based services are only reimbursed on a per diem basis, and do not include DRG or case rate reimbursement. Per diem reimbursement for both M/S and MH/SUD facility-based services are based upon the following factors and accompanying evidentiary standards: (1) geographic market, which may be adjusted based upon Medicare Geographical Practice Cost Index ("GPCI"); (2) type of provider and/or specialty (e.g. physician practitioner v. non-physician practitioner v. facility); (3) supply of provider type and/or specialty; (4) network need and/or demand for provider type and/or specialty; (5) Medicare reimbursement rates for codes with assigned Medicare Relative Value Unit ("RVU"); and (6) Training, experience and licensure of providers billing for professional services under the facility agreement.

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and/or similar providers performing similar services in similar	and/or similar providers performing similar services in similar
geographies, or claim-specific pricing where such rates are not	geographies, or claim-specific pricing where such rates are not
available – vary by provider type (i.e., facility v. physician	available – vary by provider type (i.e., facility v. physician
practitioner v. non-physician practitioner), service type (i.e., CPT	practitioner v. non-physician practitioner), service type (i.e., CPT
codes), and geography, as the costs of rendering services vary	codes), and geography, as the costs of rendering services vary
based on these factors. If such an indirect rate arrangement does	based on these factors. If such an indirect rate arrangement does
not exist, cannot be obtained, or is unacceptable, as the case may	not exist, cannot be obtained, or is unacceptable, as the case may
be, then the reimbursement amount payable for services rendered	be, then the reimbursement amount payable for services rendered
by the out-of-network provider is, again, equal to the lesser of (I)	by the out-of-network provider is, again, equal to the lesser of (I)
the covered billed charges submitted by the provider or (ii) the	the covered billed charges submitted by the provider or (ii) the
percentile of the service's MRC set forth in the plan.	percentile of the service's MRC set forth in the plan.
In the absence of such an acceptable rate arrangement, and as	In the absence of such an acceptable rate arrangement, and as
previously noted, the plan agrees to pay a benefit equal to the	previously noted, the plan agrees to pay a benefit equal to the
lesser of the billed charges or the client-elected Maximum	lesser of the billed charges or the client-elected Maximum
Reimbursable Charge for the covered services, which, as	Reimbursable Charge for the covered services, which, as
described, above, is calculated based on the Maximum	described, above, is calculated based on the Maximum
Reimbursable Charge methodology selected by the plan.	Reimbursable Charge methodology selected by the plan.

E. Provide any evidence and documentation to establish that the limitation(s) is applied no more stringently, as written and in operation, to mental health and substance use disorder benefits than to medical and surgical benefits.

In-Network Providers (Office)

Cigna's methodology and process for negotiating in-network provider reimbursements for M/S services and MH/SUD services within a classification of benefits are comparable and no more stringent for MH/SUD services than for M/S services within the same classification of benefits as written.

Cigna also follows a comparable process in determining payment rates for non-physician providers for both M/S and MH/SUD benefits. In this process, variables including market demand, provider specialty and availability and frequency of requests for provider fee increases may result in differentials in reimbursement rates across M/S and MH/SUD provider types.

An 'in operation' review of Cigna's medical/surgical and MH/SUD reimbursement rates from a sampling of Cigna-administered plans and CO plans revealed that M/S providers are reimbursed on average at a higher percentage of Medicare than MH/SUD providers.

While there is a disparate outcome in the in-operational review of Cigna's medical/surgical and MH/SUD reimbursement rates that results from differences in local market dynamics, such outcome does not mean the in-practice NQTL standards are non-comparable or being applied more stringently to MH/SUD benefits. Because in-network provider reimbursement is a factor relevant to NQTL compliance insofar as it impacts accessibility to in-network providers and Cigna's network admissions criteria, itself the relevant NQTL, Cigna emphasizes that the comparable out-of-network utilization over the recent measurement period across MH/SUD and M/S benefits and the achievement of applicable network adequacy requirements for MH/SUD and M/S providers, respectively, evidences that any discrepancies in rates offered to MH/SUD providers is not affecting Cigna's ability to admit a sufficient number of providers.

In terms of operational parity compliance, Cigna has assessed the reimbursement rates paid across its book-of-business by reference to reimbursement data in 2019 and 2020. In its assessment, Cigna identified variances in provider reimbursement rates with a significant number of percentage points between M/S and MH/SUD providers. Specifically, Cigna's M/S and MH/SUD reimbursement rates from Cigna-administered plans revealed that M/S providers are reimbursed on average at a higher percentage of Medicare than MH/SUD providers. Specifically, Cigna reviewed CPT codes 99213 and 99214 for M/S physicians compared to MH/SUD psychiatrists. While the average reimbursement rates for CPT codes 99213 and 99214 reflect a discrepancy between the M/S and MH/SUD reimbursement rates, differences in reimbursement rates alone are not the basis for a parity violation provided they are the outcome of comparable processes, factors, and standards for negotiation of provider reimbursement rates. In this instance, differences in the market factors like a qualitatively higher degree of bargaining power for practitioners affiliated with groups or facilities translate into generally higher reimbursement rates for M/S providers as compared to MH/SUD providers. More specifically, increases above the standard reimbursement of non-physician practitioners at an amount less than 100% of Medicare are based on variables such as the higher incidence of facility/group-affiliation for non-physician practitioners, thus affording them substantially higher bargaining power and, in turn, rates. Moreover, differences in intensity of the service delivery may warrant variations in reimbursement; for example, inpatient MH/SUD treatment is commonly less intensive and thus less costly than M/S hospitalization. It must also be emphasized that discrepancies in bargaining power or competitive market forces (e.g., what a provider generally receives or demands as reimbursement) are not conducive to quantitative assessment in a way that translates to rigid, formulaic standards for establishing rates by provider or provider type. That is, the evidentiary standard for an articulated factor, such as market need, may not be, and need not be, expressed as an elaborate metric or formula(e); rather, and to illustrate the point, the evidentiary standard can be a qualitative factor such as, as is often the case in provider negotiations, an assessment of the amount that the plan or its administrator needs to offer to acquire or retain the provider relative to its ability to do so. To wit, the notable increase in MH/SUD rates over the past two years, which correlates to the increases that Cigna has implemented in new rate negotiations with MH/SUD practitioners is evidenced by the downward trend in percentages of M/S rates as compared to Medicare and an upward trend in MH/SUD reimbursement rates as compared to Medicare over the course of two years. This trend is reflective of the steps Cigna has taken as a result of an internal review of its MH/SUD network demonstrating comparability and representative of comparable network access outcomes between M/S and MH/SUD benefits.

In-Network Providers (All Other Outpatient Services)

Cigna's methodology and process for negotiating in-network provider reimbursements for M/S services and MH/SUD services within a classification of benefits are comparable and no more stringent for MH/SUD services than for M/S services within the same classification of benefits as written.

Cigna also follows a comparable process in determining payment rates for non-physician providers for both M/S and MH/SUD benefits. In this process, variables including market demand, provider specialty and availability and frequency of requests for provider fee increases may result in differentials in reimbursement rates across M/S and MH/SUD provider types.

An 'in operation" review of Cigna's medical/surgical and MH/SUD reimbursement rates from a sampling of Cigna-administered plans and CO plans revealed that M/S providers are reimbursed on average at a higher percentage of Medicare than MH/SUD providers. While there is a disparate outcome in the in-operational review of Cigna's medical/surgical and MH/SUD reimbursement rates that results from differences in local market dynamics, such outcome does not mean the in-practice NQTL standards are non-comparable or being applied more stringently to MH/SUD benefits. Because in-network provider reimbursement is a factor relevant to NQTL compliance insofar as it impacts accessibility to in-network providers and Cigna's network admissions criteria, itself the relevant NQTL, Cigna emphasizes that the comparable out-of-network utilization over the recent measurement period across MH/SUD and M/S benefits and the achievement of applicable network adequacy requirements for MH/SUD and M/S providers, respectively, evidences that any discrepancies in rates offered to MH/SUD providers is not affecting Cigna's ability to admit a sufficient number of providers.

In terms of operational parity compliance, Cigna has assessed the reimbursement rates paid across its book-of-business by reference to reimbursement data in 2019 and 2020. In its assessment, Cigna identified variances in provider reimbursement rates with a significant number of percentage points between M/S and MH/SUD providers. Specifically, Cigna's M/S and MH/SUD reimbursement rates from Cigna-administered plans revealed that M/S providers are reimbursed on average at a higher percentage of Medicare than MH/SUD providers. Specifically, Cigna reviewed CPT codes 99213 and 99214 for M/S physicians compared to MH/SUD psychiatrists. While the average reimbursement rates for CPT codes 99213 and 99214 reflect a discrepancy between the M/S and MH/SUD reimbursement rates, differences in reimbursement rates alone are not the basis for a parity violation provided they are the outcome of comparable processes, factors, and standards for negotiation of provider reimbursement rates. In this instance, differences in the market factors like a qualitatively higher degree of bargaining power for practitioners affiliated with groups or facilities translate into generally higher reimbursement rates for M/S providers as compared to MH/SUD providers. More specifically, increases above the standard reimbursement of non-physician practitioners at an amount less than 100% of Medicare are based on variables such as the higher incidence of facility/group-affiliation for non-physician practitioners, thus affording them substantially higher bargaining power and, in turn, rates. Moreover, differences in intensity of the service delivery may warrant variations in reimbursement; for example, inpatient MH/SUD treatment is commonly less intensive and thus less costly than M/S hospitalization. It must also be emphasized that discrepancies in bargaining power or competitive market forces (e.g., what a provider generally receives or demands as reimbursement) are not conducive to quantitative assessment in a way that translates to rigid, formulaic standards for establishing rates by provider or provider type. That is, the evidentiary standard for an articulated factor, such as market need, may not be, and need not be, expressed as an elaborate metric or formula(e); rather, and to illustrate the point, the evidentiary standard can be a qualitative factor such as, as is

often the case in provider negotiations, an assessment of the amount that the plan or its administrator needs to offer to acquire or retain the provider relative to its ability to do so. To wit, the notable increase in MH/SUD rates over the past two years, which correlates to the increases that Cigna has implemented in new rate negotiations with MH/SUD practitioners is evidenced by the downward trend in percentages of M/S rates as compared to Medicare and an upward trend in MH/SUD reimbursement rates as compared to Medicare over the course of two years. This trend is reflective of the steps Cigna has taken as a result of an internal review of its MH/SUD network demonstrating comparability and representative of comparable network access outcomes between M/S and MH/SUD benefits.

Out-of-Network Providers

Cigna has assessed the methodology for calculating out-of-network reimbursement amounts, and has concluded that it is designed and applied comparably, and no more stringently, as-written and in-operation across MH/SUD and M/S benefits. Cigna's methodology for determining out-of-network M/S provider reimbursement rates and out-of-network MH/SUD provider reimbursement rates are comparable and applied no more stringently to MH/SUD providers than to M/S providers as-written. As described in the foregoing, the plans establish in their terms one methodology, including the percentile or percentage, if any, applied to the MRC for the service that uniformly applies to MH/SUD and M/S benefits. There are not different methodologies for identifying the charge, or, as applicable, the percentile applied to the charge, used to calculate the amount the plan agrees to reimburse for the service rendered by an out-of-network provider. The charges used to calculate MH/SUD benefits are subject to the same percentile or percentage as applies to M/S benefits (e.g., 80% of the MRC for the service). Likewise, enrollees enjoy the protection from balance-billing afforded by any indirect rate arrangement accessed by the plan, whether the provider with which the plan has an indirect rate arrangement renders MH/SUD services or M/S services to the enrollees. Cigna does not limit application of these out-of-network rate arrangements to M/S services, and the indirect rate arrangements with MH/SUD providers leverage, just like M/S providers and where available, rates obtained by third party vendors and derived from third party databases that compile charges for the same or similar providers in the geographic area. Specifically, across MH/SUD and M/S providers the charges for services differ as-between inpatient and outpatient facilities and among different licensure/training levels, including physician and non-physician practitioners (e.g. MD/PhD v. psychologists), and across geographic areas.

In terms of operational NQTL parity compliance, Cigna assessed the application of the out-of-network reimbursement program across Cigna-administered plans and has confirmed out-of-network reimbursement methodology applied, in operation, comparably to MH/SUD benefits and no more stringently than M/S benefits received out-of-network. Specifically, Cigna-administered plans cover and thus treat as payable as plan benefits the full billed charges submitted by the MH/SUD providers at a comparable and, indeed, a generally higher rate than it pays the full billed charges for M/S providers as measured across inpatient and outpatient services paid for its entire book of business. This means that MH/SUD out-of-network providers receive reimbursement for the full submitted charges at least as often, and in some instances more often, than M/S out-of-network providers.

Cigna has concluded that it pays on average to MH/SUD providers a higher reimbursement amount than M/S providers as measured as a discount off the respective MH/SUD and M/S providers' billed charges, while such an advantageous result for MH/SUD benefits is

not required by the NQTL requirement, it does evidence that the out-of-network reimbursement methodology is actually operating in a manner that ensures enrollees accessing MH/SUD services from out-of-network providers are receiving at least comparable benefits to enrollees accessing M/S services from out-of-network providers. While not dispositive of NQTL compliance, these outcomes, in addition to the description of the foregoing process and standards for calculating out-of-network reimbursement amounts, help evidence that the out-of-network reimbursement methodologies applied under Cigna-administered plans are at least as generous for, and thus comparable and not more stringently applied to, MH/SUD inpatient and outpatient benefits in-writing and in-operation.

In-Network Facilities

Cigna's methodology and process for negotiating in-network provider reimbursements for M/S services and MH/SUD services within a classification of benefits are comparable and no more stringent for MH/SUD services than for M/S services within the same classification of benefits as written.

Cigna also follows a comparable process in determining payment rates for non-physician providers for both M/S and MH/SUD benefits. In this process, variables including market demand, provider specialty and availability and frequency of requests for provider fee increases may result in differentials in reimbursement rates across M/S and MH/SUD provider types.

An 'in operation" review of Cigna's medical/surgical and MH/SUD reimbursement rates from a sampling of Cigna-administered plans and CO plans revealed that M/S providers are reimbursed on average at a higher percentage of Medicare than MH/SUD providers. While there is a disparate outcome in the in-operational review of Cigna's medical/surgical and MH/SUD reimbursement rates that results from differences in local market dynamics, such outcome does not mean the in-practice NQTL standards are non-comparable or being applied more stringently to MH/SUD benefits. Because in-network provider reimbursement is a factor relevant to NQTL compliance insofar as it impacts accessibility to in-network providers and Cigna's network admissions criteria, itself the relevant NQTL, Cigna emphasizes that the comparable out-of-network utilization over the recent measurement period across MH/SUD and M/S benefits and the achievement of applicable network adequacy requirements for MH/SUD and M/S providers, respectively, evidences that any discrepancies in rates offered to MH/SUD providers is not affecting Cigna's ability to admit a sufficient number of providers.

In terms of operational parity compliance, Cigna has assessed the reimbursement rates paid across its book-of-business by reference to reimbursement data in 2019 and 2020. In its assessment, Cigna identified variances in provider reimbursement rates with a significant number of percentage points between M/S and MH/SUD providers. Specifically, Cigna's M/S and MH/SUD reimbursement rates from Cigna-administered plans revealed that M/S providers are reimbursed on average at a higher percentage of Medicare than MH/SUD providers. Specifically, Cigna reviewed CPT codes 99213 and 99214 for M/S physicians compared to MH/SUD psychiatrists. While the average reimbursement rates for CPT codes 99213 and 99214 reflect a discrepancy between the M/S and MH/SUD reimbursement rates alone are not the basis for a parity violation provided they are the outcome of comparable processes, factors, and standards for negotiation of provider reimbursement rates. In this instance, differences in the market factors like a qualitatively higher degree of bargaining power for practitioners affiliated with groups or facilities translate into generally

higher reimbursement rates for M/S providers as compared to MH/SUD providers. More specifically, increases above the standard reimbursement of non-physician practitioners at an amount less than 100% of Medicare are based on variables such as the higher incidence of facility/group-affiliation for non-physician practitioners, thus affording them substantially higher bargaining power and, in turn, rates. Moreover, differences in intensity of the service delivery may warrant variations in reimbursement; for example, inpatient MH/SUD treatment is commonly less intensive and thus less costly than M/S hospitalization. It must also be emphasized that discrepancies in bargaining power or competitive market forces (e.g., what a provider generally receives or demands as reimbursement) are not conducive to quantitative assessment in a way that translates to rigid, formulaic standards for establishing rates by provider or provider type. That is, the evidentiary standard for an articulated factor, such as market need, may not be, and need not be, expressed as an elaborate metric or formula(e); rather, and to illustrate the point, the evidentiary standard can be a qualitative factor such as, as is often the case in provider negotiations, an assessment of the amount that the plan or its administrator needs to offer to acquire or retain the provider relative to its ability to do so. To wit, the notable increase in MH/SUD rates over the past two years, which correlates to the increases shat Cigna has implemented in new rate negotiations with MH/SUD practitioners is evidenced by the downward trend in percentages of M/S rates as compared to Medicare and an upward trend in MH/SUD reimbursement rates as compared to Medicare over the course of two years. This trend is reflective of the steps Cigna has taken as a result of an internal review of its MH/SUD network demonstrating comparability and representative of comparable network access outcomes between M/S and MH/SUD benefits.

Out-of-Network Facilities

Cigna has assessed the methodology for calculating out-of-network reimbursement amounts, and has concluded that it is designed and applied comparably, and no more stringently, as-written and in-operation across MH/SUD and M/S benefits. Cigna's methodology for determining out-of-network M/S provider reimbursement rates and out-of-network MH/SUD provider reimbursement rates are comparable and applied no more stringently to MH/SUD providers than to M/S providers as-written. As described in the foregoing, the plans establish in their terms one methodology, including the percentile or percentage, if any, applied to the MRC for the service that uniformly applies to MH/SUD and M/S benefits. There are not different methodologies for identifying the charge, or, as applicable, the percentile applied to the charge, used to calculate the amount the plan agrees to reimburse for the service rendered by an out-of-network provider. The charges used to calculate MH/SUD benefits are subject to the same percentile or percentage as applies to M/S benefits (e.g., 80% of the MRC for the service). Likewise, enrollees enjoy the protection from balance-billing afforded by any indirect rate arrangement accessed by the plan, whether the provider with which the plan has an indirect rate arrangement renders MH/SUD services or M/S services to the enrollees. Cigna does not limit application of these out-of-network rate arrangements to M/S services, and the indirect rate arrangements with MH/SUD providers leverage, just like M/S providers and where available, rates obtained by third party vendors and derived from third party databases that compile charges for the same or similar providers in the geographic area. Specifically, across MH/SUD and M/S providers the charges for services differ as-between inpatient and outpatient facilities and among different licensure/training levels, including physician and non-physician practitioners (e.g. MD/PhD v. psychologists), and across geographic areas.

MHPAEA Summary Form

In terms of operational NQTL parity compliance, Cigna assessed the application of the out-of-network reimbursement program across Cigna-administered plans and has confirmed out-of-network reimbursement methodology applied, in operation, comparably to MH/SUD benefits and no more stringently than M/S benefits received out-of-network. Specifically, Cigna-administered plans cover and thus treat as payable as plan benefits the full billed charges submitted by the MH/SUD providers at a comparable and, indeed, a generally higher rate than it pays the full billed charges for M/S providers as measured across inpatient and outpatient services paid for its entire book of business. This means that MH/SUD out-of-network providers receive reimbursement for the full submitted charges at least as often, and in some instances more often, than M/S out-of-network providers.

Cigna has concluded that it pays on average to MH/SUD providers a higher reimbursement amount than M/S providers as measured as a discount off the respective MH/SUD and M/S providers' billed charges, while such an advantageous result for MH/SUD benefits is not required by the NQTL requirement, it does evidence that the out-of-network reimbursement methodology is actually operating in a manner that ensures enrollees accessing MH/SUD services from out-of-network providers are receiving at least comparable benefits to enrollees accessing M/S services from out-of-network providers. While not dispositive of NQTL compliance, these outcomes, in addition to the description of the foregoing process and standards for calculating out-of-network reimbursement amounts, help evidence that the out-of-network reimbursement methodologies applied under Cigna-administered plans are at least as generous for, and thus comparable and not more stringently applied to, MH/SUD inpatient and outpatient benefits in-writing and in-operation.

Benefit	Classification	# of Authorization Requests Received	# of Authorization Requests Approved	# of Authorization Requests Denied	% Approved	% Denied
Mental Health Benefits	INN-Inpatient	46	44	2	96%	4%
Denents	OON-Inpatient	2	1	1	50%	50%
	Emergency Services	-	-	-	#DIV/0!	#DIV/0!
	RX	122	82	40	67%	33%
	INN-Outpatient-Office	-	-	-	#DIV/0!	#DIV/0!
	OON-Outpatient-Office	-	-	-	#DIV/0!	#DIV/0!
	INN-Outpatient-AllOther	16	15	1	94%	6%
	OON-Outpatient- AllOther	3	3	-	100%	0%
Substance Use Disorder Benefits	INN-Inpatient	12	11	1	92%	8%
Disorder Benefits	OON-Inpatient	6	6	-	100%	0%
	Emergency Services	-	-	-	#DIV/0!	#DIV/0!
	RX	1	-	1	0%	100%
	INN-Outpatient-Office	-	-	-	#DIV/0!	#DIV/0!
	OON-Outpatient-Office	-	-	-	#DIV/0!	#DIV/0!
	INN-Outpatient-AllOther	15	15	-	100%	0%
	OON-Outpatient- AllOther	4	4	-	100%	0%
Medical /Surgical Benefits	INN-Inpatient	3,340	3,140	200	94%	6%
benents	OON-Inpatient	62	58	4	94%	6%
	Emergency Services	-	-	-	#DIV/0!	#DIV/0!
	RX	2,391	1,859	532	78%	22%
	INN-Outpatient-Office	5,038	3,835	1,203	76%	24%
	OON-Outpatient-Office	166	80	86	48%	52%
	INN-Outpatient-AllOther	3,941	3,226	715	82%	18%
	OON-Outpatient-	295	163	132	55%	45%
	AllOther Network Status Unknown-Outpatient-	3	2	1	67%	33%

Health Plan PPO-OAP Traditional Open Access Plan

Benefit	Classification	# of Claims	# of Claims	# of Claims	% Approved % Denied	Reasons for Denial of
		Submitted	Approved	Denied		Claims
Mental Health Benefits	INN-Inpatient	99	92	7	93%	7% <mark>1647,1340,1091,1274,1802</mark>
BARATITE	OON-Inpatient	56	53	3	95%	5% 1274,1702,1231
	Emergency Services	71	61	10	86%	14% 1274,720,1649,1091,1702,72
						0

	MHPAEA Da	ta Report for C	alendar Year E	nding Decemb	oer 31, 2021 (§15–	-144(f))	
Health Plan		PPO-OAP Traditio	onal Open Access	Plan			
	RX	15,348	12,214	3,134	80%	20%	895 7M 75 54 8R 76 79 77 56 65 65 AG 7V 88 88 81 78 85
	INN-Outpatient-Office	12,039	11,654	385	97%	3%	70 22 ET 7X 1244,1487,1650,1647,1344,1 005,1649,45,1976,1710,1697, 720,1747,1736,1091,1759,17 45,1753,1274,1756,1754,172
	OON-Outpatient-Office	3,511	2,089	1,422	59%	41%	0,1705,1719 45,1648,1977,1934,1650,127 4,1329,1745,1705,1720,1719, 1697,1710,1091,1572,1231,1 759,1756,1753
	INN-Outpatient-AllOther	1,069	1,037	32	97%	3%	1574,45,1005,1966,1976,177 8,1487,1514,1556,1649,1704, 1719,1705,1736,1754,720,15 72,1274
	OON-Outpatient- AllOther	735	451	284	61%	39%	1650,45,1329,1966,1697,123 1,1753,1719,1720
Substance Use Disorder Benefits	INN-Inpatient	16	16	-	100%	0%	0
	OON-Inpatient Emergency Services RX	28 18 215	28 18 196	- - 19	100% 100% 91%	0% 0% 9%	0
	INN-Outpatient-Office	112	107	5	96%	4%	45,1244,1720,720
	OON-Outpatient-Office	76	69	7	91%	9%	45,1759,1231
	INN-Outpatient-AllOther	192	185	7	96%	4%	1647,720,1600,1719
	OON-Outpatient- AllOther	319	250	69	78%	22%	45,1983,1637,1719,720,1790, 1274,1231
Medical /Surgical Benefits	INN-Inpatient	2,819	2,690	129	95%	5%	1756,27,1745,1707,1574,171 9,1705,1973,1720,1702,1699, 1487,1790,720,1243,1716,17 47,1091,1649,45,1005,1340,1 545,1647,1000
	OON-Inpatient	418	351	67	84%	16%	1702,1705,1710,1747,1699,1 231,1091,1756,1745,1719,17 20,1650,1778,45,1648
	Emergency Services	7,004	6,448	556	92%	8%	27,1736,1710,1702,1719,123 1,1721,1859,1720,1705,348,1 753,1738,1747,1756,720,171 6,1719,1592,1091,1790,1736, 1313,1756,1702,1562,720,27, 1344,1600,1790,1091,1716,1 711,1244,1317,1329,1340,16 47,1487,1556,1649,45,1650,1 568,1339,1330,1556

Health Plan		PPO-OAP Traditio			Jei 31, 2021 (815–		
	RX	67,834	50,919	16,915	75%		816, 81, 34, 7X, 7V, 9E, 7Z, DU 75, 65, RX, 79, 8K, 895, 77 MR, AG, ET, 85, 76, 8F, 8R 8E, 9G, EZ, 22, 7M 28 78 E3 41 50 23 70 EE 54 88 83 QS 606 04 56 13
	INN-Outpatient-Office	53,267	47,563	5,704	89%	11%	1772,1565,1923,1603,1721,1 767,1313,1647,45,1572,1649, 1756,1562,27,1730,1600,175 3,1745,1754,1703,1566,1868, 1729,1599,1711,1705,1719,1 598,1720,1925,1736,1567,17 02,1592,1243,720,1710,1790, 348,1716,1571,1747,1714,15 56,1676,1514,1091,1550,212, 1574,1005,1604,1568,1943,1 344,1329,1544,1366,1605,15 78,1317,1285,1487,1785,151 3,1244
	OON-Outpatient-Office	1,240	-	1,240	0%	- - -	1599,1719,1702,1720,1705,1 716,1697,1567,1736,1747,72 0,1698,1091,1248,1710,1790, 1753,1231,1756,1600,1754,1 745,1711,1244,1650,1513,13 29,45,1285,1648
	INN-Outpatient-AllOther	30,743	28,658	2,085	93%		$\begin{array}{c} 1754, 1868, 1561, 1775, 1729, 1\\ 704, 1592, 1702, 1728, 1698, 19\\ 25, 1705, 1720, 1528, 1973, 171\\ 9, 1571, 1747, 348, 1243, 1859, 1\\ 36, 1710, 1567, 1716, 1778, 72\\ 0, 1091, 1894, 1790, 1774, 1562, 1572, 1527, 1344, 1313, 1920, 1\\ 1572, 1527, 1344, 1313, 1920, 1\\ 1575, 1703, 1566, 1563, 1966, 104\\ 9, 1611, 1578, 1785, 1244, 1487, 1330, 1664, 1503, 1966, 156\\ 556, 1340, 1573, 1908, 1576, 15\\ 556, 1340, 1573, 1908, 1576, 15\\ 555, 1363, 1336, 1609, 1552, 160\\ 6, 1676, 1544, 1514, 1494, 1574, 1543, 277, 1550, 1532, 1649, 189\\ 8, 1005, 45, 1604, 1605, 1568, 16\\ 00\end{array}$
	OON-Outpatient- AllOther	3,680	2,763	917	75%	(1774,1091,1231,1703,1756,1 648,1745,1988,1705,1736,19 07,1248,1719,1720,1698,170 2,1710,1790,720,1885,1738,1 716,1243,1329,45,1005,1340, 1244,1966,1778,1650

MHPAEA Data Report for Calendar Year Ending December 31, 2021 (§15–144(f))

Denial Cou	de Denial Meaning
04	M/I PROCESSOR CONTROL NUMBER
04 09	M/I DATE OF BIRTH
11	M/I PATIENT RELATIONSHIP CODE M/I OTHER COVERAGE CODE
13	
21	SERVICE INCLUDED IN PRICER
22	M/I DISPENSE AS WRITTEN (DAW)/PRODUCT SELECTION CODE
23	M/I INGREDIENT COST SUBMITTED
27	OUR RECORDS INDICATED THAT THIS DEPENDENT IS NOT COVERED BY YOUR PLAN.
28	M/I DATE PRESCRIPTION WRITTEN
34	AGE INVALID FOR DIAGNOSIS
34	M/I SUBMISSION CLARIFICATION CODE
41	SUBMIT BILL TO OTHER PROCESSOR OR PRIMARY PAYER
45	YOUR PLAN BOOKLET LISTS THE SERVICES AND PROCEDURES COVERED BY YOUR PLAN. THE PLAN WILL ONLY PAY FOR SERVICES LISTED IN THE BOOKLET.
45	YOUR PLAN BOOKLET LISTS THE SERVICES AND PROCEDURES COVERED BY YOUR PLAN. THE PLAN WILL ONLY PAY FOR SERVICES LISTED IN THE BOOKLET.
54	NON-MATCHED PRODUCT/SERVICE ID NUMBER
54 56	
	NON-MATCHED PRESCRIBER ID
60	PRODUCT/SERVICE NOT COVERED FOR PATIENT AGE
65	PATIENT IS NOT COVERED
66	NOT COVERED UNDER MEDICAL PLANTO BE PAID AS 'HRA ONLY' SERVICE
70	PRODUCT/SERVICE NOT COVERED - PLAN/BENEFIT EXCLUSION
71	PRESCRIBER ID IS NOT COVERED
73	ADDITIONAL FILLS ARE NOT COVERED
75	PRIOR AUTHORIZATION REQUIRED
76	PLAN LIMITATIONS EXCEEDED
77	DISCONTINUED PRODUCT/SERVICE ID NUMBER
78	COST EXCEEDS MAXIMUM
79	FILL TOO SOON
81	CLAIM TOO OLD
81	CLAIM TOO OLD
83	DUPLICATE PAID/CAPTURED CLAIM
85	CLAIM NOT PROCESSED
88	DUR REJECT ERROR
212	HEALTH CARE PROFESSIONAL: YOU SUBMITTED THIS CLAIM TO THE INCORRECT ADDRESS. WE HAVE FORWARDED IT TO AMERICAN SPECIALTY HEALTH FOR PROCESSING.
320	CHARGES FOR TREATMENT OF INTENTIONALLY SELF-INFLICTED INJURY OR TREATMENT OF CONDITIONS RESULTING FROM OR IN ANY WAY
520	RELATED TO THAT INJURY ARE NOT COVERED UNDER YOUR PLAN.
348	THIS AMOUNT WAS PREVIOUSLY PAID UNDER A DIFFERENT CLAIM NUMBER.
606	BRAND DRUG/SPECIFIC LABELER CODE REQUIRED
816	PHARMACY BENEFIT EXCLUSION, MAY BE COVERED UNDER PATIENT'S MEDICAL BENEFIT
895	ALLOWED NUMBER OF OVERRIDES EXHAUSTED
1000	THESE BENEFITS WERE REDUCED OR DENIED BECAUSE THE PRE- ADMISSION REVIEW PROCEDURES OUTLINED IN THE PLAN WERE NOT
	FOLLOWED. THIS AMOUNT REPRESENTS DOLLARS ASSOCIATED WITH THE PRE-CERTIFICATION NOT OBTAINED FOR THE SERVICES RENDERED.
	THE PROVIDER IS PROHIBITED FROM BILLING THE PATIENT FOR THIS AMOUNT. IF YOU HAVE ALREADY PAID THIS AMOUNT, PLEASE REQUEST
	REIMBURSEMENT FROM YOUR PROVIDER.
1005	PROVIDER: THESE BENEFITS WERE REDUCED DUE TO FAILURE TO OBTAIN PRE-CERTIFICATION APPROVAL AS OUTLINED IN THE PLAN. THIS
	AMOUNT REPRESENTS DOLLARS ASSOCIATED WITH THE PRE-CERTIFICATION NOT OBTAINED FOR THE SERVICES RENDERED. THE PROVIDER IS
	PROHIBITED FROM BILLING THE PATIENT FOR THIS AMOUNT. CUSTOMER: IF YOU HAVE ALREADY PAID THIS AMOUNT, PLEASE REQUEST
ļ	REIMBURSEMENT FROM YOUR PROVIDER.
1046	THIS CHARGE IS DENIED AS THE MODIFIER SUBMITTED WITH THE PROCEDURE CODE IS INAPPROPRIATE ACCORDING TO CPT GUIDELINES. A
	CORRECTED CLAIM MAY BE SUBMITTED ALONG WITH A COPY OF THIS EOP TO THE ABOVE ADDRESS. THE PATIENT IS NOT RESPONSIBLE TO
	PAY THIS AMOUNT.
1049	THIS CHARGE IS DENIED AS THERE IS A CONFLICT WITH EITHER THE PROCEDURE CODE AND PLACE OF SERVICE, THE DIAGNOSIS AND
	PROCEDURE CODE, OR PROCEDURE IS INAPPROPRIATE FOR AN OUTPATIENT SETTING. PLEASE VERIFY THE PROCEDURE AND/OR PLACE OF
	SERVICE AND FORWARD A CORRECTED CLAIM WITH THIS EOP TO THE ABOVE ADDRESS. THE PATIENT IS NOT RESPONSIBLE TO PAY THIS
1053	THIS CHARGE IS DENIED. THE PLAN HAS ALREADY PROCESSED A FACILITY CHARGE FOR THIS SERVICE. IT NEEDS TO BE SUBMITTED GLOBALLY
	ON A HCFA 1500. SEND A CORRECTED STATEMENT WITH A COPY OF THIS EOP TO THE ADDRESS ABOVE. THE PATIENT IS NOT RESPONSIBLE TO
	PAY THIS AMOUNT.
1091	ZERO DOLLARS BILLED; NO PAYMENT DUE.
1091	MISSING SEMI-PRIVATE ROOM RATE - WE HAVE RECEIVED YOUR CLAIM FOR SERVICES WITH A MISSING SEMI-PRIVATE ROOM RATE. PLEASE
****	RE-SUBMIT A CORRECTED CLAIM WITH THEAPPROPRIATE SEMI-PRIVATE ROOM RATE AND SEND IT WITH A COPY OF THIS EOP TO THE ABOVE
	ADDRESS. AFTER THIS INFORMATION IS RECEIVED, THE CLAIM WILL BE PROCESSED INACCORDANCE WITH THE PLAN'S BENEFIT PROVISIONS. IF
Ì	ADDRESS. AFTER THIS INFORMATION IS RECEIVED, THE CLAIM WILL BE PROCESSED INACCORDANCE WITH THE PLAN'S BENEFIT PROVISIONS. IF WE DON'T RECEIVE THE INFORMATION WE'LL HAVE TO CLOSE THE CLAIM.
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 HEATHCARE MEMBER SERVESS DEPARTMENT INDICATED ON THE BACK OF THE MEMBERS ID CARD. SUBMIT APPAL INFORMATION EVENDATINE MEMORY IN THE ANALYDRAE HEATHCARE AND AND AND AND AND AND AND AND AND AND	1223	SERVICES ARE REDUCED OR DENIED FOR NO BEHAVIORAL HEALTH AUTHORIZATION ON FILE. QUESTIONS SHOULD BE DIRECTED TO CIGNA
EVERNORTH BEHAVIORAL HEALTH, APPENDS, P. O., BOX 188064, CHATTANOGA, TH 37422. THIS CHARGE IS DENIED THE PROCEDURE CODE SUBMITED DESINT DE SCIENT HE PROCEDURE NOTED IN THE OPENATIVE REPORT 24 CODE FOR DOCUMENTATION PURPOSES ON CODE SUBMITED DESINT DE SCIENT HE PROCEDURE NOTED IN THE OPENATIVE REPORT 274 ODE FOR DOCUMENTATION PURPOSES SONT, NO SERVARE REBURUSSKIMENT WARRANTED. NOT PADL DO NOT BILL MCMBERE. 274 DUR RECORDS ON ONT REFLECT AN AUTHORIZATION ON FILE AND ADDITIONAL INFORMATION PROM THE HEALTH ADDRERNDOW PROK SUBMITED TO TRUE WITH E CLAIM PORTING VIEW STATE. FOLLAS DURING MARTING NEEL 275 DEVENT TE CLAIM PORTINGS, PO BOX 188064, CHATTANOGGA, TN 37422. IF WE DON'T RECEIVE THE INFORMATION WELL 276 THIS CLARGE DENIED INCLAUS THE INFORMATION AND SUPPLIED BY VOLB STATE. FLASS CONTACT YOUR STATE FOR INFORMATION NOVEL 278 THIS CHARGE SONGIELE TO PAYT THIS AMOUNT. 379 THIS CHARGE DENIED INCLAUS THE INFORMATION AND SUPPLIED BY VOLB STATE. FLASS CONTACT YOUR STATE FOR INFORMATION AND SENSITIE TO PAYT THIS AMOUNT. 379 THIS CHARGE DENIED INCLAUS CHETHER AMISSING OR INVALID DAYS OR UNTS. PLASS RESUMMT A CORRECTED CLAIM WITH THIS HEARD CONTINUE ADVIDUALITY EXCLAS RE SUBMITA CORRECTED CLAIM WITH THIS ADVIDUALITY SALES RESUMMT A CORRECTED CLAIM WITH THIS INFORMATION AND SENSING OR INVALID DAYS OR UNTS. PLASE RE SUBMIT A CORRECTED CLAIM WITH THE 370 THIS CHARGE DEDINED BECAUSE OF A MISSING OR INVALID DAYS OR UNTS. PLASE RE SUBMIT A CORRECTED CLAIM WITH THE 371 THIS CHARGE DEDINED BECAUSE OF A MISSING OR INVALID DAYS OR UNTS. PLASE RE SUBMIT A CORRECTED CLAIM WITH THE 370 T		
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		RESPONSIBLE TO PAY THIS AMOUNT.

1513	HEALTH CARE PROFESSIONAL: WE CANNOT PAY THIS CLAIM BECAUSE THE MEDICAL DIRECTOR HAS DETERMIED THAT THE SERVICE IS NOT
1919	MEDICALLY NECESSARY. A DETAILED EXPLINATION WILL BE SENT SEPARATELY. DO NOT BILL THE PATIENT. SEND APPEAL REQUESTS TO
	MEDICALLT NECESSART, A DETAILED EXPENSION WILL BE SENT SEPARATELY, DO NOT BLE THE PATIENT, SEND APPEAR REQUESTS TO MEDSOLUTIONS, INC AT 730 COOL SPRINGS BOULEVANRD, SUTIE 800, FRANKLIN, TENNESSEE 37067
1514	YOU DID NOT REQUEST APPROVAL FOR THESE SERVICES PRIOR TO THE SERVICES BEING PERFORMED. HOWEVER, WE REVIEWED THE RELATED
1011	DOCUMENTATION AND FOUND NO REASON TO MAKE A PAYMENT EXCEPTION IN THIS CASE. YOU CAN T BILL THE PATIENT. PLEASE SEND
	APPEAL REQUESTS TO MEDSOLUTIONS AT 730 COOL SPRINGS BOULEVARD, SUITE 800, FRANKLIN, TENNESSEE 37067.
1532	THIS CHARGE IS DENIED. THE PROVIDER'S SPECIALTY DOES NOT ALLOW BILLING FOR THIS PROCEDURE. THE MEMBER IS NOT RESPONSIBLE
	FOR PAYMENT.
1543	PAYMENT FOR THIS SERVICE IS DENIED. THE FREQUENCY LIMITATION SET BY THE PLAN'S PAYMENT POLICY FOR THIS CODE HAS BEEN
	EXCEEDED. THE MEMBER IS NOT RESPONSIBLE FOR PAYMENT.
1544	THIS CHARGE IS DENIED AS THE UNITS SUBMITTED HAVE EXCEEDED THE LIMIT SET BY THE PLAN'S PAYMENT POLICY. THE MEMBER IS NOT
	RESPONSIBLE FOR PAYMENT.
1545	THIS EVALUATION & MANAGEMENT PROCEDURE IS DENIED. ANOTHER E&M PROCEDURE HAS ALREADY BEEN SUBMITTED FOR THIS MEMBER
	FOR THIS DATE OF SERVICE. THE MEMBER IS NOT RESPONSIBLE FOR PAYMENT.
1550	THIS CHARGE HAS BEEN DENIED AS THE MODIFIER SUBMITTED IS INAPPROPRIATE FOR THE PROCEDURE CODE BILLED. A CORRECTED CLAIM
	MAY BE SUBMITTED.
1552	THIS CHARGE IS DENIED. THE ADD-ON PROCEDURE CODE WAS DENIED BECAUSE THE CORRESPONDING PRIMARY PROCEDURE CODE WAS NOT
	PAID OR WAS NOT IDENTIFIED ON THE CLAIM. THE MEMBER IS NOT RESPONSIBLE FOR PAYMENT.
1554	PAYMENT FOR THIS SERVICE IS DENIED. THIS PROCEDURE IS MUTUALLY EXCLUSIVE OF ANOTHER PROCEDURE BILLED FOR THE SAME DATE OF
	SERVICE. THE MEMBER IS NOT RESPONSIBLE FOR PAYMENT.
1555	THIS CHARGE IS DENIED. THE PROCEDURE DOES NOT REQUIRE THE SERVICES OF AN ASSISTANT SURGEON. THE MEMBER IS NOT RESPONSIBLE
	FOR PAYMENT.
1556	THIS CHARGE IS DENIED. PAYMENT FOR THIS SERVICE IS INCLUDED IN THE PRIMARY PROCEDURE. THIS PROCEDURE IS CONSIDERED AN
	"INCIDENT TO SERVICE". THE MEMBER IS NOT RESPONSIBLE FOR PAYMENT.
1563	THIS CHARGE IS DENIED. THE PRIMARY PROCEDURE, REQUIRED FOR THIS CODE, WAS NOT SUBMITTED OR HAS BEEN DENIED. THE MEMBER IS
4560	NOT RESPONSIBLE FOR PAYMENT.
1568	THIS CHARGE IS DENIED. THE PROCEDURE CODE SUBMITTED WAS INAPPROPRIATELY CODED BASED ON THE INFORMATION INDICATED ON
1572	THE CLAIM AND THE PLAN'S PAYMENT POLICY. THE MEMBER IS NOT RESPONSIBLE FOR PAYMENT.
1573	THIS CHARGE IS DENIED. THE PROCEDURE, AS DEFINED BY CPT-4, IS BILATERAL IN NATURE. MODIFIER 50 IS NOT APPROPRIATE TO BE BILLED WITH THIS PROCEDURE. THE MEMBER IS NOT RESPONSIBLE FOR PAYMENT.
1574	THIS CHARGE HAS BEEN DENIED. THE PLACE OF SERVICE INDICATED IS NOT APPROPRIATE FOR THIS PROCEDURE. THE MEMBER IS NOT
1374	RESPONSIBLE FOR PAYMENT.
1576	THIS CHARGE IS DENIED. THE PROCEDURE HAS BEEN SUBMITTED AS A TECHNICAL COMPONENT AND IS THEREFORE NOT PAYABLE FOR THE
1370	PLACE OF SERVICE INDICATED ON THE CLAIM. THE MEMBER IS NOT RESPONSIBLE FOR PAYMENT.
1578	THIS CLAIM IS DENIED. THE DIAGNOSIS IS INAPPROPRIATELY CODED PER ICD CODING GUIDELINES. SUBMIT A CORRECTED CLAIM. THE
	MEMBER IS NOT RESPONSIBLE FOR PAYMENT.
1599	BASED ON THE INFORMATION WE HAVE AVAILABLE, THE SERVICES OR SUPPLIES ON THIS CLAIM ARE NOT MEDICALLY NECESSARY.
1600	BASED ON THE INFORMATION WE HAVE AVAILABLE, THE SERVICES OR SUPPLIES ON THIS CLAIM ARE NOT MEDICALLY NECESSARY.
1603	HEALTH CARE PROFESSIONAL: WE DENIED THIS CHARGE BECAUSE THE ICD DIAGNOSIS/PROCEDURE CODE USED IS NOT CURRENTLY VALID.
	PLEASE UPDATE THE CLAIM WITH THE APPROPRIATE CODE AND SEND IT TO THE ADDRESS ON THE BACK OF THE PATIENT S ID CARD.
1604	HEALTH CARE PROFESSIONAL: YOU DID NOT OBTAIN THE PRECERTIFICATION FOR THIS PROCEDURE CODE THAT IS REQUIRED BY THE CIGNA
	RADIATION THERAPY PROGRAM. IF YOU HAVE QUESTIONS PLEASE CALL 866.668.9250. PLEASE SEND APPEAL REQUESTS TO CIGNA RADIATION
	THERAPY PROGRAM AT P.O. BOX 698, LAKE KATRINE, NY 12449.
1605	HEALTH CARE PROFESSIONAL: THE APPROVED QUANTITIES FOR THIS PROCEDURE HAVE ALREADY BEEN PROCESSED FOR THIS PATIENT. PER
	THE CIGNA RADIATION THERAPY PROGRAM TREATMENT PLAN, THERE ARE NO QUANTITIES REMAINING FOR THIS PROCEDURE. IF YOU HAVE
	QUESTIONS, PLEASE CALL 866.668.9250. PLEASE SEND APPEAL REQUESTS TO CIGNA RADIATION THERAPY PROGRAM AT P.O. BOX 698, LAKE
	KATRINE, NY 12449.
1606	HEALTH CARE PROFESSIONAL: CIGNA'S RADIATION THERAPY PROGRAM ALLOWS THIS PROCEDURE CODE TO BE BILLED ONLY ONCE PER
	TREATMENT DAY. IF YOU HAVE QUESTIONS, PLEASE CALL 866.668.9250. PLEASE SEND APPEAL REQUESTS TO CIGNA RADIATION THERAPY
	PROGRAM AT P.O. BOX 698, LAKE KATRINE, NY 12449.
1609	HEALTH CARE PROFESSIONAL: CIGNA'S RADIATION THERAPY PROGRAM DOES NOT ALLOW THIS PROCEDURE TO BE BILLED WITH OTHER
	PROCEDURES FOR THE SAME DATE OF SERVICE. IF YOU HAVE QUESTIONS, PLEASE CALL 866.668.9250. PLEASE SEND APPEAL REQUESTS TO
1011	CIGNA RADIATION THERAPY PROGRAM AT P.O. BOX 698, LAKE KATRINE, NY 12449.
1611	HEALTH CARE PROFESSIONAL: CIGNA'S RADIATION THERAPY PROGRAM ALLOWS THIS PROCEDURE ONLY ONCE PER TREATMENT COURSE. IF
	YOU HAVE QUESTIONS, PLEASE CALL 866.668.9250. PLEASE SEND APPEAL REQUESTS TO CIGNA RADIATION THERAPY PROGRAM AT P.O. BOX
1614	698, LAKE KATRINE, NY 12449.
1614	HEALTH CARE PROFESSIONAL: THE DATE OF SERVICE IS NOT WITHIN THE APPROVED CIGNA RADIATION THERAPY PROGRAM TREATMENT
	PLAN DATES. IF YOU HAVE QUESTIONS, PLEASE CALL 866.668.9250. PLEASE SEND APPEAL REQUESTS TO CIGNA RADIATION THERAPY
1637	PROGRAM AT P.O. BOX 698, LAKE KATRINE, NY 12449. PROVIDER: WE ARE UNABLE TO DETERMINE IF THE SERVICES PERFORMED ARE PART OF A PROGRAM OR IF THEY ARE INDIVIDUAL SERVICES.
1037	PROVIDER: WE ARE UNABLE TO DETERMINE IF THE SERVICES PERFORMED ARE PART OF A PROGRAM OR IF THEY ARE INDIVIDUAL SERVICES. PLEASE PROVIDE THE CORRECT REVENUE/PROCEDURE CODE(S) AND A BRIEF DESCRIPTION OF THE SERVICES BEING PERFORMED. PLEASE
	SUBMIT TO: CIGNA HEALTHSOLUTIONS, PO BOX 188064 CHATTANOOGA, TN 37422. IF WE DON'T RECEIVE THE INFORMATION WE'LL HAVE TO
	CLOSE THE CLAIM.

1647	HEALTH CARE PROFESSIONAL: YOUR CLAIM WAS RECEIVED WITH A MISSING OR INVALID SERVICE CODE BASED ON OUR REIMBURSEMENT
	POLICY. PLEASE CORRECT THE INFORMATION AND RE-SUBMIT THE CLAIM, ALONG WITH A COPY OF THIS EOP, TO THE CLAIM ADDRESS ON
	THE BACK OF THE PATIENT'S ID CARD. IF WE DON T RECEIVE THE INFORMATION WE'LL HAVE TO CLOSE THE CLAIM. VISIT CIGNAFORHCP.COM
	TO VIEW OUR REIMBURSEMENT POLICIES.
1648	HEALTH CARE PROFESSIONAL: YOUR CLAIM WAS RECEIVED WITH A MISSING OR INVALID SERVICE CODE BASED ON OUR REIMBURSEMENT
	POLICY. PLEASE CORRECT THE INFORMATION AND RE-SUBMIT THE CLAIM, ALONG WITH A COPY OF THIS EOP, TO THE CLAIM ADDRESS ON
	THE BACK OF THE PATIENT'S ID CARD. IF WE DON T RECEIVE THE INFORMATION WE'LL HAVE TO CLOSE THE CLAIM. VISIT CIGNAFORHCP.COM
	TO VIEW OUR REIMBURSEMENT POLICIES.
1649	HEALTH CARE PROFESSIONAL: WE HAVE RECEIVED YOUR CLAIM FOR A NON-PAYABLE SERVICE. VISIT CIGNAFORHCP.COM TO VIEW OUR
	REIMBURSEMENT POLICIES.
1650	HEALTH CARE PROFESSIONAL: WE HAVE RECEIVED YOUR CLAIM FOR A NON-PAYABLE SERVICE. VISIT CIGNAFORHCP.COM TO VIEW OUR
	REIMBURSEMENT POLICIES.
1676	THIS PROCEDURE REQUIRES EITHER AN INVOICE FOR IMMUNOLOGY, OR A DESCRIPTION OF THE SERVICES PROVIDED IF ANOTHER
	PROCEDURE CODE(S) IS NOT APPLICABLE. TO RECEIVE PAYMENT, PLEASE RESUBMIT THE CLAIM WITH THIS INFORMATION THROUGH THE
	PROVIDER PAYMENT DISPUTE PROCESS. PATIENT NOT RESPONSIBLE FOR PAYMENT.
1770	THIS SERVICE OR AMOUNT IS NOT COVERED BY MEDICARE. YOUR CIGNA PLAN DOESN T PAY FOR EXPENSES NOT APPROVED BY MEDICARE.
1778	THIS SERVICE HAS BEEN DENIED. PAYMENT FOR THIS CHARGE IS INCLUDED IN THE FACILITY PAYMENT.
1778	HIS SERVICE HAS BEEN DENIED. PAYMENT FOR THIS CHARGE IS INCLUDED IN THE FACILITY PAYMENT.
1785	HEALTH CARE PROFESSIONAL: THE PROCEDURE CODE SUBMITTED IS NOT CONSIDERED MEDICALLY NECESSARY ACCORDING TO THE
	APPROVED PERCERTIFICATION ON FILE. IF YOU HAVE QUESTIONS PLEASE CALL 866.668.9250. PLEASE SEND APPEAL REQUESTS TO CIGNA
	RADIATION THERAPY PROGRAM AT P.O. BOX 698, LAKE KATRINE, NY, 12449.
1802	THE SERVICES BILLED WERE NOT THE SERVICES AUTHORIZED AND THE PATIENT CAN'T BE BILLED FOR THIS AMOUNT. CALL THE NUMBER ON
	THE CUSTOMER'S CIGNA ID CARD IF YOU HAVE QUESTIONS. YOU MAY SUBMIT APPEAL INFORMATION TO EVERNORTH BEHAVIORAL HEALTH,
	APPEALS, P. O. BOX 188064, CHATTANOOGA, TN 37422.
1808	THE SERVICES BILLED WERE NOT THE SERVICES AUTHORIZED. CALL THE NUMBER ON THE CUSTOMER'S CIGNA ID CARD IF YOU HAVE
	QUESTIONS. YOU MAY SUBMIT APPEAL INFORMATION TO EVERNORTH BEHAVIORAL HEALTH, APPEALS, P. O. BOX 188064, CHATTANOOGA,
1839	HEALTH CARE FACILITY: OCE62: THE CODE NOT APPROPRIATE FOR APC BILLING. AN ALTERNATE CODE MAY BE AVAILABLE.
1879	HEALTH CARE FACILITY: PSI B: THE CODE IS NOT APPROPRIATE FOR APC BILLING. AN ALTERNATE CODE MAY BE AVAILABLE.
1880	HEALTH CARE FACILITY: PSI C: THIS SERVICE DEEMED INPATIENT ONLY UNDER APC.
1895	EXPENSES FOR SHORT TERM REHABILITATIVE SERVICES ARE NOT COVERED FOR THIS CONDITION. PLEASE REFER TO THE SHORT TERM
1000	REHABILITATIVE SERVICES SECTION OF YOUR PLAN BOOKLET.
1898	HEALTH CARE FACILITY: YY: THIS SERVICE IS NOT REIMBURSABLE PER YOUR CONTRACT.
1899	EXPENSES FOR MENTAL HEALTH SERVICES ARE NOT COVERED UNDER YOUR PLAN. PLEASE REFER TO YOUR PLAN BOOKLET.
1908	BENEFITS WERE REDUCED DUE TO FAILURE TO COMPLY WITH PRE-CERTIFICATION RECOMMENDATIONS. SEND APPEALS TO EVICORE, 730
1500	COOL SPRINGS BLVD., STE 800, FRANKLIN, TN 37067.
1928	HEALTH CARE PROFESSIONAL: YOUR CLAIM WAS RECEIVED WITH A MISSING CPT/HCPCS CODE FOR THE REVENUE CODE SUBMITTED BASED
1520	ON OUR REIMBURSEMENT POLICY. PLEASE CORRECT THE INFORMATION AND RE-SUBMIT THE CLAIM, ALONG WITH A COPY OF THIS EOP, TO
	THE CLAIM ADDRESS ON THE BACK OF THE PATIENT'S ID CARD. VISIT CIGNAFORHCP.COM TO VIEW OUR REIMBURSEMENT POLICIES.
1934	CHARGES FOR MISSED AND/OR CANCELLED APPOINTMENTS ARE NOT COVERED BY YOUR PLAN.
1934	EXCESS UNITS ARE DENIED. PLEASE SUBMIT A CORRECTED CLAIM WITH THE JW MODIFIER IF DENIED UNITS ARE DUE TO WASTE. CUSTOMER
1945	IS NOT LIABLE.
1954	THIS CODE IS ASSOCIATED WITH A PRIMARY SERVICE THAT WAS PREVIOUSLY DENIED. VISIT CIGNAFORHCP.COM FOR A COPY OF OUR
1934	
1954	REIMBURSEMENT POLICIES. THIS CODE IS ASSOCIATED WITH A PRIMARY SERVICE THAT WAS PREVIOUSLY DENIED. VISIT CIGNAFORHCP.COM FOR A COPY OF OUR
1954	
1057	REIMBURSEMENT POLICIES.
1957	THE SUBMITTED CODE IS DENIED BECAUSE IT'S RELATED TO AN INJURY OR ILLNESS THAT HAPPENED AT YOUR WORKPLACE.
1957	THE SUBMITTED CODE IS DENIED BECAUSE IT'S RELATED TO AN INJURY OR ILLNESS THAT HAPPENED AT YOUR WORKPLACE.
1958	THE SUBMITTED CODE IS DENIED BECAUSE IT'S RELATED TO A SERVICE THAT YOUR PLAN DOESN'T COVER. PLEASE REFER TO YOUR PLAN
1966	THE REIMBURSEMENT TO THE PROVIDER FOR EVALUATION & MANAGEMENT (E&M) SERVICES IS INCLUDED IN THE REIMBURSEMENT TO THE
	HEATLH CARE PROFESSIONAL AND IS NOT SEPARATELY REIMBURSED.
1966	THE REIMBURSEMENT TO THE PROVIDER FOR EVALUATION & MANAGEMENT (E&M) SERVICES IS INCLUDED IN THE REIMBURSEMENT TO THE
	HEATLH CARE PROFESSIONAL AND IS NOT SEPARATELY REIMBURSED.
1976	THESE BENEFITS WERE REDUCED OR DENIED BECAUSE THE SERVICES RENDERED EXCEEDED THE AUTHORIZATION. THIS AMOUNT REPRESENTS
	DOLLARS ASSOCIATED WITH THE PRECERTIFICATION NOT OBTAINED FOR THE SERVICES RENDERED. THE CUSTOMER IS NOT RESPONSIBLE TO
	PAY THIS AMOUNT.
1976	THESE BENEFITS WERE REDUCED OR DENIED BECAUSE THE SERVICES RENDERED EXCEEDED THE AUTHORIZATION. THIS AMOUNT REPRESENTS
	DOLLARS ASSOCIATED WITH THE PRECERTIFICATION NOT OBTAINED FOR THE SERVICES RENDERED. THE CUSTOMER IS NOT RESPONSIBLE TO
	PAY THIS AMOUNT.
1977	THESE BENEFITS WERE REDUCED OR DENIED BECAUSE THE SERVICES RENDERED EXCEEDED THE AUTHORIZATION. THIS AMOUNT REPRESENTS
	DOLLARS ASSOCIATED WITH THE PRECERTIFICATION NOT OBTAINED FOR THE SERVICES RENDERED. THE CUSTOMER IS RESPONSIBLE TO PAY
	THIS AMOUNT.
1977	THIS AMOUNT. THESE BENEFITS WERE REDUCED OR DENIED BECAUSE THE SERVICES RENDERED EXCEEDED THE AUTHORIZATION. THIS AMOUNT REPRESENTS
1977	

1983	PLEASE SUBMIT A CORRECTED CLAIM BECAUSE THE REVENUE CODE(S) BILLED DOES NOT CORRESPOND WITH THE NARRATIVE OR
	DOCUMENTATION DESCRIPTION RECEIVED FOR THE SERVICES PERFORMED. PLEASE SUBMIT TO: EVERNORTH BEHAVIORAL HEALTH, P.O. BOX
	188064, CHATTANOOGA, TN 37422. IF WE DON'T RECEIVE THE INFORMATION WE'LL HAVE TO CLOSE THE CLAIM.
1985	THE CLAIM HAS A GENDER/PROCEDURE CODE MISMATCH. IF THE GENDER AND PROCEDURE CODE ARE CORRECT, LET US KNOW AND WE LL
	REPROCESS THE CLAIM.
!'	HEALTH CARE FACILITY: EDIT 015: THE ALLOWED UNITS REPRESENT THE MEDICALLY UNLIKELY EDIT LIMIT.
!	HEALTH CARE FACILITY: NCCI 111: THESE SERVICES ARE NOT TYPICALLY PERFORMED TOGETHER.
@A	HEALTH CARE FACILITY: PSI N: PACKAGED/INCIDENTAL SERVICES ARE NOT SEPARATELY PAYABLE.
<u>е</u> @Т	HEALTH CARE FACILITY: N1: PACKAGED/ INCIDENTAL SERVICES ARE NOT SEPARATELY PAYABLE.
@X	HEALTH CARE FACILITY: YY: THIS SERVICE IS NOT REIMBURSABLE PER YOUR CONTRACT.
`E	UNITS FOR THIS AND PREVIOUSLY SUBMITTED CLAIM(S) EXCEED THE MAXIMUM UNITS ALLOWED PER DATE OF SERVICE. THE SUBMITTED
	UNITS ARE DISALLOWED.
,ì	THE SUPPLY IS NOT SEPARATELY REIMBURSED IN ADDITION TO THE SURGICAL SERVICE THAT WAS SUBMITTED ON THE SAME DATE OF
`0	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS A COMPONENT OF ANOTHER PROCEDURE OR SERVICE THAT WAS BILLED ON THE
	SAME DATE OF SERVICE.
`Р	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS A COMPONENT OF ANOTHER PROCEDURE OR SERVICE THAT WAS SUBMITTED ON
	A PREVIOUS CLAIM.
`Q	THE UNLISTED CODE IS DISALLOWED BECAUSE A DESCRIPTION OF THE SERVICE IS REQUIRED BUT WAS NOT RECEIVED.
۲ ۷	MODIFIER 25 SHOULD BE ADDED TO THE PROBLEM-BASED VISIT AS PER OUR REIMBURSEMENT POLICY.
`Z	HEALTH CARE PROFESSIONAL: THE SUBMITTED PROCEDURE CODE IS DISALLOWED BECAUSE REIMBURSEMENT IS INCLUDED IN THE PRIMARY
-	SERVICE.
~~	THIS SERVICE IS DENIED. WE RECEIVED YOUR CLAIM WITH AN INAPPROPRIATE OR MISSING MODIFIER NEEDED FOR PROPER
~Р	THIS CODE IS ASSOCIATED WITH A PRIMARY SERVICE THAT WAS PREVIOUSLY DENIED. VISIT CIGNAFOR HCP.COM FOR A COPY OF OUR
•	REIMBURSEMENT POLICIES.
~Z	THE REIMBURSEMENT TO THE PROVIDER FOR EVALUATION & MANAGEMENT (E&M) SERVICES IS INCLUDED IN THE REIMBURSEMENT TO THE
2	HEATLH CARE PROFESSIONAL AND IS NOT SEPARATELY REIMBURSED.
2C	THE ICD DX/PX CODE USED IS EXPIRED OR NOT EFFECTIVE FOR THE DATE OF SERVICE. PLEASE SUBMIT A NEW CLAIM TO THE ADDRESS ON THE
20	PATIENT'S ID CARD.
4A	DOCTOR: YOU DID NOT OBTAIN PRECERTIFICATION FOR THIS PROCEDURE THROUGH THE CIGNA RADIATION THERAPY PROGRAM. PLEASE
4A	CALL 866.668.9250 WITH QUESTIONS.
4B	DOCTOR: NO MORE QUANTITIES ARE AVAILABLE FOR THIS PROCEDURE CODE THROUGH CIGNA'S RADIATION THERAPY PROGRAM. PLEASE
4D	CALL 866.668.9250 WITH QUESTIONS.
4C	DOCTOR: CIGNA'S RADIATION THERAPY PROGRAM ALLOWS THIS PROCEDURE CODE TO BE BILLED ONCE PER TREATMENT DAY. PLEASE CALL
40	866.668.9250 WITH QUESTIONS.
40	DOCTOR: THE PROC. CODE IS NOT MEDICALLY NECESSARY PER THE PRECERT ON FILE WITH CIGNA RADIATION THERAPY PRGRM. PLEASE CALL
40	866.668.9250 WITH QUESTIONS.
6Z	PROVIDER NOT ELIGIBLE TO PERFORM SERVICE/DISPENSE PRODUCT
7A	PROVIDER NOT ELIGIBLE TO FERIORIAI SERVICE/DISFENSE FRODOCT
7M	DISCREPANCY BETWEEN OTHER COVERAGE CODE AND OTHER COVERAGE INFORMATION ON FILE
7V	DISCREPANCE BETWEEN OTHER COVERAGE CODE AND OTHER COVERAGE INFORMATION ON FILE
7V 7W	NUMBER OF REFILLS AUTHORIZED EXCEED ALLOWABLE REFILLS
7VV 7X	DAYS SUPPLY EXCEEDS PLAN LIMITATION
7X 7Z	COMPOUND REQUIRES TWO OR MORE INGREDIENTS
8A	COMPOUND REQUIRES AT LEAST ONE COVERED INGREDIENT
8E	M/I DUR/PPS LEVEL OF EFFORT
8F	Your compound medication contains non covered ingredient(s)
8K	DAW CODE VALUE NOT SUPPORTED
8R	SUBMISSION CLARIFICATION CODE VALUE NOT SUPPORTED
9E	QUANTITY DOES NOT MATCH DISPENSING UNIT
9G	QUANTITY DISPENSED EXCEEDS MAXIMUM ALLOWED
AA	A WRITTEN EXPLANATION OF THE REASON FOR THIS DENIAL AND YOUR RIGHT TO APPEAL WAS MAILED TO YOU UNDER SEPARATE COVER.
AG	DAYS SUPPLY LIMITATION FOR PRODUCT/SERVICE
B1	WE DO NOT REIMBURSE FOR CONSUMABLE MEDICAL SERVICES PROVIDED IN THE PHYSICIAN'S OFFICE.
BB	SERVICES ARE NOT COVERED BY THE CONTRACT. PLEASE REFER TO THE PLAN DOCUMENT.
BJ	
BN	SERVICES NOT COVERED OUT OF NETWORK OR ARE AVAILABLE IN MEMBER'S NETWORK. PLEASE CALL MEMBER SERVICES AT THE NUMBER
20	ON YOUR ID CARD WITH QUESTIONS.
BO	DENIED COVERED UNDER GLOBAL MA
ВТ	SERVICES ARE NOT COVERED BY THE MEMBER'S PLAN. PLEASE REFER TO THE PLAN DOCUMENT. CALL MEMBER SERVICES AT THE NUMBER ON
	YOUR ID CARD WITH QUESTIONS.
CD	
DU	M/I GROSS AMOUNT DUE
e04	THE CODE IS DISALLOWED. IT WAS RECEIVED AFTER THE AMERICAN MEDICAL ASSOCIATION OR CENTERS FOR MEDICARE AND MEDICAID
	SERVICES DELETION DATE.

e06	THE SERVICE IS DISALLOWED. THE MODIFIER AND CODE COMBINATION IS INVALID. APPEALS REQUIRE THE FACILITY NAME, ADDRESS AND TIN
	WHERE RENDERED.
e08	THE UNLISTED CODE IS DISALLOWED BECAUSE A DESCRIPTION OF THE SERVICE IS REQUIRED BUT WAS NOT RECEIVED.
e11	ANESTHESIA SERVICES ARE NOT WARRANTED FOR THIS PROCEDURE OR SERVICE.
e12	THE SUBMITTED PROCEDURE CODE IS DISALLOWED BECAUSE IT IS INCONSISTENT WITH THE PATIENT'S AGE.
e14	THIS PROCEDURE CODE IS DISALLOWED BECAUSE THE RELATED PRIMARY SERVICE WAS EITHER NOT BILLED OR DENIED.
e19	THE PROCEDURE CODE IS DISALLOWED BECAUSE A SURGICAL CODE WAS BILLED RATHER THAN AN ANESTHESIA CODE.
e26	ACCORDING TO CMS, THIS PROCEDURE IS ALWAYS BUNDLED WHEN BILLED WITH ANY OTHER PROCEDURE, SO THE SUBMITTED CODE IS
	DISALLOWED.
e27	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS INCIDENTAL TO A CODE BILLED ON THE SAME DATE OF SERVICE.
e29	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS A COMPONENT OF ANOTHER PROCEDURE OR SERVICE THAT WAS BILLED ON THE
52	SAME DATE OF SERVICE.
E3 e31	M/I INCENTIVE AMOUNT SUBMITTED THIS SERVICE IS NOT ALLOWED BECAUSE IT IS PART OF A CMS NCCI COLUMN 1/COLUMN 2 EDIT.
e31 e32	THE SUPPLY IS NOT ALLOWED BECAUSE IT IS PART OF A CIVIS NECT COLOMIN 1/COLOMIN 2 EDIT.
E5	M/I PROFESSIONAL SERVICE CODE
e73	THE QUANTITY OF UNITS BILLED EXCEEDS THE MEDICALLY UNLIKELY EDIT LIMIT.
e81	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT SHOULD ONLY BE PERFORMED ONCE PER DATE OF SERVICE.
e82	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE THE MAXIMUM NUMBER OF UNITS THAT CAN BE PERFORMED PER DATE OF SERVICE
02	HAS BEEN EXCEEDED.
E84	PROVIDER: INCONSISTENT WITH INDUSTRY STANDARDS, THE CPT/HCPCS CODE IS MISSING FOR THE REVENUE CODE SUBMITTED. RESUBMIT A
201	CORRECTED CLAIM.
e96	YOUR PLAN DOES NOT PROVIDE COVERAGE FOR THESE EXPENSES.
e97	THIS CODE IS ASSOCIATED WITH A PRIMARY SERVICE THAT WAS PREVIOUSLY DENIED. VISIT CIGNAFORHCP.COM FOR A COPY OF OUR
	REIMBURSEMENT POLICIES.
EDL	OUR RECORDS INDICATE THIS MEMBER IS OVER THE MAXIMUM DEPENDENT AGE LIMIT.
EE	M/I COMPOUND INGREDIENT DRUG COST
ET	M/I QUANTITY PRESCRIBED
EZ	M/I PRESCRIBER ID QUALIFIER
f02	BASED ON THE INFORMATION WE HAVE AVAILABLE, SERVICES OR SUPPLIES ON THIS CLAIM ARE NOT MEDICALLY NECESSARY.
f16	HEALTH CARE PROFESSIONAL: THIS SERVICE CODE IS INVALID. REFER TO OUR REIMBURSEMENT POLICY ON CIGNAFORHCP.COM, AND SUBMIT
	A CORRECTED CLAIM.
f18	HEALTH CARE PROFESSIONAL: THE SUBMITTED PROCEDURE CODE IS DISALLOWED BECAUSE REIMBURSEMENT IS INCLUDED IN THE PRIMARY
	SERVICE.
f19	HEALTH CARE PROFESSIONAL: THIS SERVICE HAS BEEN DENIED. PAYMENT FOR THIS CHARGE IS INCLUDED IN THE FACILITY PAYMENT.
f21	HEALTH CARE PROFESSIONAL: WE HAVE RECEIVED YOUR CLAIM FOR A NON-PAYABLE SERVICE. VISIT CIGNAFORHCP.COM TO VIEW OUR
	REIMBURSEMENT POLICIES.
f26	HEALTH CARE PROFESSIONAL: THE SUBMITTED CODE IS DISALLOWED BECAUSE REIMBURSEMENT IS INCLUDED IN THE PRIMARY SERVICE
6 - 0	PREVIOUSLY CONSIDERED.
f53	THE SUBMITTED CODE IS DISALLOWED AS IT IS ASSOCIATED WITH AN INJURY OR ILLNESS THAT OCCURRED IN THE WORKPLACE.
f54 ~28	FACILITY FEES FOR EVALUATION & MANAGEMENT (E & M) CARE ARE NOT SEPARATELY PAID.
g28	THE SUBMITTED CODE IS DISALLOWED DUE TO A PRIOR CLAIM. PER CMS, THE SUBMITTED CODE IS ALWAYS BUNDLED WHEN BILLED WITH
a20	ANY OTHER PROCEDURE. THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS INCIDENTAL TO A CODE BILLED ON THE SAME DATE OF SERVICE FOR A PRIOR
g30 g32	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS INCIDENTAL TO A CODE BILLED ON THE SAME DATE OF SERVICE FOR A PRIOR THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS MUTUALLY EXCLUSIVE TO A CODE BILLED ON THE SAME DATE OF SERVICE FOR A
goz	PRIOR CLAIM.
g33	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS MUTUALLY EXCLUSIVE TO A CODE BILLED ON THE SAME DATE OF SERVICE.
g34	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS A COMPONENT OF ANOTHER PROCEDURE OR SERVICE THAT WAS SUBMITTED ON
534	A PREVIOUS CLAIM.
g38	THIS SERVICE IS NOT ALLOWED BECAUSE IT IS PART OF A CMS NCCI COLUMN 1/COLUMN 2 EDIT THAT INCLUDES A PROCEDURE OR SERVICE
800	ON A PRIOR CLAIM
g40	THE SUPPLY IS NOT SEPARATELY REIMBURSED IN ADDITION TO THE SURGICAL SERVICE THAT WAS PREVIOUSLY SUBMITTED.
g44	THIS PRE-OPERATIVE SRVC/MEDICAL VISIT IS INCLUDED IN AND CONSIDERED PART AN ASSOCIATED SURGICAL PROCEDURE SUBMITTED ON A
0	SEPARATE CLAIM.
g46	THIS POST-OPERATIVE SRVC/MEDICAL VISIT IS INCLUDED IN AND CONSIDERED PART OF AN ASSOCIATED SURGICAL PROCEDURE SUBMITTED
0	ON A SEPARATE CLAIM.
g75	THE QUANTITY OF UNITS ON THE CLAIM, IN ADDITION TO BILLED UNITS ON A PREVIOUSLY SUBMITTED CLAIM, EXCEEDS THE MEDICALLY
-	UNLIKELY EDIT LIMIT.
g80	THE COMBINED UNITS FOR THIS CLAIM AND A PREVIOUSLY SUBMITTED CLAIM EXCEED THE MAXIMUM NUMBER OF UNITS PER DATE OF
g81	THE PROCEDURE IS DISALLOWED BECAUSE THIS SERVICE OR A COMPONENT OF THIS SERVICE WAS PREVIOUSLY BILLED BY ANOTHER HEALTH
	CARE PROFESSIONAL.
GL	PAYMENT EXCEPTION WILL NOT BE MADE. YOU CAN'T BILL PATIENT. PLEASE SEND APPEALS TO MEDSOLUTIONS, 730 COOL SPRINGS BLVD.,
	FATMENT EXCEPTION WILL NOT BE MADE. TOO CAN I BILL PATIENT. FLEASE SEND AFFEALS TO MEDSOLUTIONS, 750 CODE SPRINGS BEVD.,
h28	STE 800, FRANKLIN, TN 37067.

RESPONSIBLE FOR THIS AMOUNT. IT THE CODE IS DISALLOWED DUE TO A PREVIOUSLY RECEIVED CLAIM WITH A PRIMARY SERVICE BILLED WITH A QUANTITY GREATER THAN ONE IT THE SUBMITTED CONSULTATION CODE IS DISALLOWED BECAUSE A CONSULTATION CODE FOR AN OUTPATIENT STAY WAS PREVIOUSLY SUBMITTED. THE SUBMITTED CODE IS DISALLOWED BUE TO A PRIOR CLAIM. PER CMS, THE SUBMITTED CODE IS ALWAYS BUNDLED WHEN BILLED WITH ANY OTHER PROCEDURE. ANY OTHER PROCEDURE. IT THIS PROCEDURE CODE IS DISALLOWED BECAUSE THE RELATED PRIMARY SERVICE. IT THIS PROCEDURE CODE IS DISALLOWED BECAUSE THE RELATED PRIMARY SERVICE WAS EITHER NOT BILLED OR DENIED. IALLOWED. ACCORDING TO CMS, THIS PROCEDURE IS AUWYS BUNDLED WHEN BILLED WITH ANY OTHER PROCEDURE, SO THE SUBMITTED CODE IS IDISALLOWED. INSTRUCT/MEDICAUCE/MEDICAL VISIT IS INCLUDED IN AND CONSIDERED PART OF THE ASSOCIATED SURGICAL PROCEDURE SUBMITTED CODE IS ISI THIS POST-OPERATIVE SERVICE/MEDICAL VISIT IS INCLUDED IN AND CONSIDERED PART OF THE ASSOCIATED SURGICAL PROCEDURE FOR A PRIOR ISI THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS INCLUDENTIAL TO A CODE BILLED ON THE SAME DATE OF SERVICE FOR A PRIOR ISI THE SUBMITTED ORNOCEDURE IS DISALLOWED BECAUSE IT IS INCLUDENTIAL TO A CODE BILLED ON THE SAME DATE OF SERVICE FOR A PRIOR ISI THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS INCLUDENTIAL AND CONSIDERED PART OT THE SURGICAL PROCEDURE SUBMITTED O		DASED UPON THE INFORMATION DEPORTED ON CONTAINED IN THE FILE SERVICES WERE NOT DENDERED AS DULED. THE DATIENT IS NOT
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SUBMITTED PREVIOUSLY.	KK	THE MEDICAL VISIT IS INCLUDED IN AND CONSIDERED PART OF THE SURGICAL PROCEDURE PERFORMED ON THE SAME DATE OF SERVICE
		SUBMITTED PREVIOUSLY.

KM	THIS PROCEDURE CODE SUBMISSION REPRESENTS MULTIPLE UNITS. REFER TO LINES BELOW FOR INDIVIDUAL UNIT DISPOSITION.
KN	THIS PROCEDURE AND ONE SUBMITTED SEPARATELY ARE CONSIDERED PART OF ANOTHER PROCEDURE PERFORMED ON THE SAME DAY AND SUBMITTED ON THIS CLAIM.
МО	CLAIM REVIEWED AND DENIED FOR FAILURE TO OBTAIN PRIOR AUTHORIZATION. DO NOT BILL MEMBER.
MR	PRODUCT NOT ON FORMULARY
MR2	MEMBER'S BENEFIT PLAN LIMITS PAYMENT TO MAXIMUM REIMBURSABLE CHARGE. THE PROVIDER MAY BILL THE MEMBER FOR THE
MS	HEALTH CARE PROFESSIONAL: YOU SUBMITTED THIS CLAIM TO THE INCORRECT ADDRESS. WE HAVE FORWARDED IT TO EVICORE FOR
MU	SERVICES PROVIDED BY NON-PARTICIPATING PROVIDER ARE NOT COVERED SINCE THE MEMBER'S PLAN HAS NO OUT OF NETWORK BENEFITS
	MEMBER RESPONSIBLE
N17	THIS SERVICE IS NOT COVERED WHEN PERFORMED IN THIS SETTING.
N29	CLINICAL DAILY MAXIMUM EXCEEDED
OAS	THIS SERVICE IS NOT NORMALLY COVERED FOR MEMBERS IN THIS AGE RANGE
Ρ[HEALTH CARE PROFESSIONAL: YOU SUBMITTED THIS CLAIM TO THE INCORRECT ADDRESS. WE HAVE FORWARDED IT TO AMERICAN SPECIALT HEALTH FOR PROCESSING.
PE	M/I REQUEST COORDINATION OF BENEFITS/OTHER PAYMENTS SEGMENT
PL	HEALTH CARE PROFESSIONAL: THIS IS A NON-PAYABLE; NON-PERMITTED SERVICE PER YOUR CONTRACTUAL AGREEMENT. DO NOT BILL THE PATIENT.
PN	SERVICE NOT PAYABLE PER PROVIDER CONTRACT. DO NOT BILL MEMBER.
QS	Drug Coverage limitations
R9	VALUE IN GROSS AMOUNT DUE DOES NOT FOLLOW PRICING FORMULAE
RX	No Refills or limited refills authorized
S20	EXPENSES INCURRED PRIOR TO THE EFFECTIVE DATE OF COVERAGE ARE INELIGIBLE.
SC	THE PATIENT IS NOT A COVERED MEMBER UNDER THE PLAN
SM	WE REQUESTED INFORMATION WITH NO RESPONSE. WE MUST CLOSE OUR FILE. IF INFORMATION IS SUBMITTED, WE WILL RECONSIDER THE
SN	WE REQUESTED INFORMATION WITH NO RESPONSE. WE MUST CLOSE OUR FILE. IF INFORMATION IS SUBMITTED, WE WILL RECONSIDER THE INITIAL CLAIM REVIEW.
SS	EXPENSES INCURRED AFTER THE DATE COVERAGE TERMINATES ARE INELIGIBLE.
ST	EXPENSES INCURRED AFTER THE DATE COVERAGE TERMINATES ARE INELIGIBLE.
ST	COVERED UNDER GLOBAL FEE
SW	CLAIM NOT SUBMITTED ON TIME. YOUR CONTRACT PROHIBIITS BILLING THE PATIENT. SEND PROOF OF TIMELY FILING TO ADDRESS ON ID
TF0	CLAIM NOT SUBMITTED ON TIME. IN-NETWORK HEALTH CARE PROFESSIONALS CAN'T BILL THE PATIENT. SEND PROOF OF TIMELY FILING TO ADDRESS ON ID CARD.
TF1	CLAIM NOT SUBMITTED ON TIME. IN-NETWORK HEALTH CARE PROFESSIONALS CAN'T BILL THE PATIENT. SEND PROOF OF TIMELY FILING TO ADDRESS ON ID CARD.
UM0	SERVICES WERE DISALLOWED BY UTILIZATION MANAGEMENT
UM1	UNITS EXCEED A UTILIZATION MANAGEMENT AUTHORIZATION
V01	DOCTOR: YOU DID NOT OBTAIN PRECERTIFICATION FOR THIS PROCEDURE THROUGH THE CIGNA RADIATION THERAPY PROGRAM. CALL 866.668.9250 WITH QUESTIONS
V02	DOCTOR: NO MORE QUANTITIES ARE AVAILABLE FOR THIS PROCEDURE CODE THROUGH CIGNA'S RADIATION THERAPY PRGM. CALL
	866.668.9250 WITH QUESTIONS.
V06	DOCTOR THE CIGNA RADIATION THERAPY PROCEDURE CAN'T BE BILLED ON THE SAME DATE OF SERVICE AS OTHER SERVICES. CALL 866.668.9250 WITH QUESTIONS
V08	DOCTOR: CIGNA'S RADIATION THERAPY PROGRAM ALLOWS THIS PROCEDURE ONLY ONCE PER TREATMENT COURSE. CALL 866.668.9250 WIT QUESTIONS.
V11	DOCTOR: THE DATE OF SERVICE IS NOT WITHIN THE APPROVED CIGNA RADIATION THERAPY PRGM TREATMENT PLAN DATE. CALL 866.668.9252 WITH QUESTIONS.
V13	THE PROC. CODE IS NOT MEDICALLY NECESSARY PER THE PRECERT ON FILE WITH CIGNA RADIATION THERAPY PRGRM. CALL 866.668.9250 WITH QUESTIONS.
VBM	THE HEALTHCARE PROFESSIONAL PROVIDED INSUFFICIENT INFORMATION TO CONSIDER THESE CHARGES.
VBX	THE PROCEDURE IS DISALLOWED EITHER BECAUSE IT IS A COMPONENT OR DUPLICATE OF THE GLOBAL OBSTETRICAL PACKAGE CODE
VCI	PREVIOUSLY SUBMITTED. DRUG KITS WITH BOTH DRUGS AND SUPPLIES ARE NOT COVERED. THE DRUG(S) SHOULD BE BILLED SEPARATELY WITH THE CODING FOR THE
	DRUG(S) ALONE.
VFB	THE SUBMITTED PROCEDURE CODE IS DISALLOWED BECAUSE IT EXCEEDS THE RECOMMENDED LIMIT AS OUTLINED IN OUR COVERAGE OR REIMBURSEMENT POLICY.
VGD	NO SEPARATE REIMBURSEMENT WARRANTED. NOT PAID. DO NOT BILL MEMBER.
VGD VGE	THE CLAIM HAS A GENDER/PROCEDURE CODE MISMATCH. IF THE GENDER AND PROCEDURE CODE ARE CORRECT, LET US KNOW AND WE LL
	REPROCESS THE CLAIM.
VL4	SERVICE NOT COVERED DOES NOT MEET YOUR PLAN'S DEFINITION FOR MEDICALLYNECESSARY CARE OR TREATMENT.
VNB	OUR RECORDS DO NOT INDICATE YOUR NEWBORN CHILD IS ENROLLED FOR COVERAGE. PLEASE CONTACT YOUR EMPLOYER IF THIS
\ /NI !	INFORMATION IS INCORRECT.
VNJ	HEALTH CARE PROFESSIONAL: THIS SERVICE IS MUTUALLY EXCLUSIVE TO ANOTHER CODE BILLED ON A SEPARATE CLAIM FOR THE SAME DATE OF SERVICE.

VNK	HEALTH CARE PROFESSIONAL: THE SERVICE THIS PROCEDURE CODE REPRESENTS IS MUTUALLY EXCLUSIVE TO ANOTHER PROCEDURE CODE
	ON THIS CLAIM.
VQD	SUBMITTED PROCEDURE IS DISALLOWED, INCIDENTAL TO OTHER PROCEDURES.
VQS	THIS SERVICE IS NOT ALLOWED, BECAUSE IT HAS BEEN UNBUNDLED FROM AN ALL-INCLUSIVE SERVICE. THE PATIENT ISN T RESPONSIBLE FOR THIS AMOUNT.
VQT	THIS SERVICE IS NOT ALLOWED, BECAUSE IT HAS BEEN UNBUNDLED FROM AN ALL-INCLUSIVE SERVICE. THE PATIENT ISN T RESPONSIBLE FOR THIS AMOUNT.
VTF	CLAIM NOT SUBMITTED ON TIME. IN-NETWORK HEALTH CARE PROFESSIONALS CAN'T BILL THE PATIENT. SEND PROOF OF TIMELY FILING TO ADDRESS ON ID CARD.
VTP	THE CODE IS DISALLOWED. IT WAS RECEIVED AFTER THE AMERICAN MEDICAL ASSOCIATION OR CENTERS FOR MEDICARE AND MEDICAID SERVICES DELETION DATE.
VUX	THIS SERVICE IS DENIED. WE RECEIVED YOUR CLAIM WITH AN INAPPROPRIATE OR MISSING MODIFIER NEEDED FOR PROPER
VVB	THIS ISN'T A COVERED EXPENSE, BASED ON THE INFORMATION WE RECEIVED RELATED TO THIS CLAIM.
VWC	NO BENEFIT IS PAYABLE FOR AN ILLNESS OR INJURY FOR WHICH A MEMBER CAN RECEIVE BENEFITS UNDER WORKERS' COMPENSATION OR SIMILAR LAWS.
X04	MEMBER NOT ELIGIBLE FOR COVERAGE.
ХАВ	RECORDS SHOW THE PATIENT ASSISTANCE PROGRAM PROVIDED THIS DRUG. PLEASE PROVIDE AN INVOICE FROM THE MANUFACTURER THAT SHOWS YOU WERE BILLED.
XAM	MAXIMUM BENEFITS FOR DURABLE MEDICAL EQUIPMENT HAVE NOW BEEN ISSUED FOR THIS EQUIPMENT/SUPPLY.
XB2	SERVICES RENDERED BY UNLICENSED PROVIDERS OR ENTITIES ARE NOT COVEREDUNDER BENEFIT PLANS ADMINISTERED OR UNDERWRITTEN BY CIGNA.
XB7	SERVICES RENDERED BY UNLICENSED PROVIDERS OR ENTITIES ARE NOT COVERED UNDER BENEFIT PLANS ADMINISTERED OR UNDERWRITTEN BY CIGNA.
XBD	INCOMPLETE CLAIM - INVALID DIAGNOSIS CODE. PLEASE CORRECT AND RESUBMIT WITH THIS CLAIM.
XC1	BASED ON THE INFORMATION WE HAVE AVAILABLE, SERVICES OR SUPPLIES ON THIS CLAIM ARE NOT MEDICALLY NECESSARY.
XCU	PRECERTIFICATION IS NOT FOUND. SUPPORTING DOCUMENTATION NEEDED FROM THE SURGEON FOR CONSIDERATION BASED ON THE PLAN S BENEFIT PROVISIONS.
XDD	THESE ARE DUPLICATE CHARGES. PREVIOUS CHARGES APPLIED TO THE DEDUCTIBLE OR CO-PAY.
XE1	BASED ON THE INFORMATION WE HAVE AVAILABLE, SERVICES OR SUPPLIES ON THIS CLAIM ARE NOT MEDICALLY NECESSARY.
XEP	EXPERIMENTAL, INVESTIGATIONAL OR UNPROVEN SERVICES ARE NOT COVERED AS DEFINED BY YOUR PLAN.
XFF	WHEN CIGNA ADMINISTERS OR UNDERWRITES A PLAN, WE DON'T COVER CHARGES NOT BILLED TO YOU OR THAT YOU AREN'T REQUIRED TO
XFG	WHEN CIGNA ADMINISTERS OR UNDERWRITES A PLAN, WE DON'T COVER CHARGES NOT BILLED TO YOU OR THAT YOU AREN'T REQUIRED TO
XJA	EQUIPMENT/SUPPLIES DO NOT APPEAR MEDICALLY NECESSARY FOR THE DIAGNOSIS
HLX	THIS PROCEDURE IS CONSIDERED INCIDENTAL TO OR A PART OF THE PRIMARY PROCEDURE.
XJK	DUPLICATE PROCEDURES DENIAL. PROVIDER, PLEASE SUBMIT OFFICE NOTES IF SEPARATE VISITS OCCURRED IN THE SAME DAY.
XJM	SERVICE EXCEEDS AUTHORIZED LIMITS OR WAS NOT AUTHORIZED.
XMG	HEALTH CARE PROFESSIONAL:BASED ON INFORMATION IN OUR FILE FOR THIS CLAIM, THE SERVICES YOU PROVIDED DON'T MATCH THE SERVICES YOU BILLED
ХМН	HEALTH CARE PROFESSIONAL: BASED ON INFORMATION IN OUR FILE FOR THIS CLAIM, THE SERVICES YOU PROVIDED DON'T MATCH THE SERVICES YOU BILLED.
XMR	YOUR PLAN LIMITS EXPENSES FOR ROOM AND BOARD. PLEASE SEE YOUR PLAN DOCUMENTS FOR MORE DETAILS.
XQW	INAPPROPRIATE BILLING - PLEASE BILL PER THE LIFESOURCE CONTRACT AGREEMENT.
XS1	THIS SERVICE IS NOT A COVERED EXPENSE AS DEFINED BY YOUR PLAN.
XS2	SERVICE NOT COVERED DOES NOT MEET YOUR PLAN'S DEFINITION FOR MEDICALLY NECESSARY CARE OR TREATMENT.
XS5	THIS SERVICE IS NOT COVERED WHEN RENDERED BY A NON-NETWORK PROVIDER AS SHOWN IN YOUR PLAN'S BENEFITS SCHEDULE
XS9	THIS SERVICE IS NOT COVERED WHEN RENDERED BY A NON-NETWORK PROVIDER AS SHOWN IN YOUR PLAN'S BENEFITS SCHEDULE.
XSJ	THERE IS INSUFFICIENT INFORMATION TO CONSIDER THESE CHARGES. THE PATIENT IS NOT RESPONSIBLE FOR THIS AMOUNT.
XSW	THIS SERVICE IS NOT A COVERED EXPENSE AS DEFINED BY YOUR PLAN.
XT1	THIS SERVICE IS NOT A COVERED EXPENSE AS DEFINED BY YOUR PLAN.
XT2	THIS SERVICE IS NOT COVERED AS BILLED. PLEASE RESUBMIT WITH A VALID CPT4 CODE.
XU0	PRE-TREATMENT AUTHORIZATION REQUIRED BY THE PLAN WAS OBTAINED BUT NOTFOLLOWED. MEMBER NOT LIABLE FOR NOT COVERED AMOUNT.
XU1	SERVICE NOT COVERED WAS NOT PRE-AUTHORIZED AS REQUIRED BY THE PLAN OR AUTHORIZATION WAS DENIED. MEMBER NOT LIABLE IF CONTRACTED PROVIDER.
XU4	NON-COVERED SERVICE WAS NOT PRE-AUTHORIZED AS REQUIRED BY THE PLAN. MEMBER NOT LIABLE FOR NOT COVERED AMOUNT.
XU8	PRE-TREATMENT AUTHORIZATION REQUIRED, BUT NOT OBTAINED. PLEASE SUBMIT MEDICAL NECESSITY.
XU9	PRE-TREATMENT AUTHORIZATION REQUIRED BY THE PLAN WAS OBTAINED BUT NOT FOLLOWED. MEMBER NOT LIABLE FOR NOT COVERED AMOUNT.
XUC	DENIED AS NOT MEDICALLY NECESSARY. PATIENT NOT LIABLE. SEND APPEALS TO MEDSOLUTIONS, 730 COOL SPRINGS BLVD., STE 800, FRANKLIN, TN 37067.
XUD	PAYMENT EXCEPTION WILL NOT BE MADE. PATIENT NOT LIABLE. SEND APPEALS TO MEDSOLUTIONS, 730 COOL SPRINGS BLVD., STE 800, FRANKLIN, TN 37067.
XUE	THE SERVICE NOT COVERED DOES NOT MEET YOUR PLAN'S DEFINITION FOR MEDICALLY NECESSARY CARE OR TREATMENT.
XUF	SERVICE NOT COVERED WAS NOT PRE-AUTHORIZED AS REQUIRED BY THE PLAN OR AUTHORIZATION WAS DENIED. MEMBER NOT LIABLE IF CONTRACTED PROVIDER.

XUG	PAYMENT EXCEPTION WILL NOT BE MADE. PATIENT NOT LIABLE. SEND APPEALS TO EVICORE, 730 COOL SPRINGS BLVD., STE 800, FRANKLIN,
	TN 37067.
XUH	AUTHORIZATION WAS OBTAINED BUT NOT FOLLOWED. MEMBER NOT LIABLE. SEND APPEALS TO EVICORE, 730 COOL SPRINGS BLVD., STE 800,
	FRANKLIN, TN 37067
XV1	THIS SERVICE IS NOT A COVERED EXPENSE AS DEFINED BY YOUR PLAN.
XV8	PRE-TREATMENT AUTHORIZATION REQUIRED, BUT NOT OBTAINED. PLEASE SUBMIT MEDICAL NECESSITY.
ZA9	ADDITIONAL INFORMATION REQUIRED: HEALTH CARE PROFESSIONAL, PLEASE SUBMIT COPY OF PATIENT'S MEDICAL RECORDS WITH A COPY
	OF THIS REQUEST.
ZAG	ADDITIONAL INFORMATION REQUIRED: PROVIDER, PLEASE SUBMIT NAME, ADDRESS, AND TELEPHONE NUMBER WITH A COPY OF THIS
ZAO	ADDITIONAL INFORMATION REQUIRED: PROVIDER, PLEASE SUBMIT ITEMIZED HOSPITAL BILL WITH A COPY OF THIS REQUEST.
ZAX	ADDITIONAL INFORMATION REQUIRED: PROVIDER, PLEASE SUBMIT THE NDC NUMBER AND DRUG NAME FOR THIS SERVICE WITH A COPY OF
	THIS REQUEST.
ZB3	ADDITIONAL INFORMATION REQUIRED: PROVIDER, PLEASE SUBMIT A BREAKDOWN BY SERVICE FOR THIS CHARGE WITH A COPY OF THIS
ZB9	ADDITIONAL INFORMATION REQUIRED: PROVIDER, PLEASE RESUBMIT THE CLAIM WITH THE RELATED CPT4/HCPCS/REV CODES FOR ALL FEES.
ZBC	ADDITIONAL INFORMATION REQUIRED: PROVIDER, PLEASE RESUBMIT WITH CONTRACTED PRICING FOR THESE SERVICES.
ZBO	ADDITIONAL INFORMATION REQUIRED: PROVIDER, PLEASE HAVE THE REFERRING PHYSICIAN SUBMIT DIAGNOSIS/ICD 10 CODE AND RELATED
	CPT4/HCPCS CODES WITH A COPY OF THIS REQUEST.
ZBP	ADDITIONAL INFORMATION REQUIRED: PROVIDER, PLEASE SUBMIT ITEMIZED BILL INCLUDING REVENUE CODES FOR EACH CHARGE WITH A
	COPY OF THIS REQUEST.
ZC6	ADDITIONAL INFORMATION REQUIRED. PROVIDER, PLEASE SUBMIT DENTAL X-RAYS AND A PERIODONTAL CHART WITH A COPY OF THIS
ZD2	ADDITIONAL INFORMATION REQUIRED. PROVIDER, PLEASE SUBMIT A DESCRIPTION OF SERVICE OR SUPPLIES FURNISHED.
ZDA	ADDITIONAL INFORMATION REQUIRED. PROVIDER, PLEASE SUBMIT THE PURCHASE PRICE OF THIS ITEM WITH A COPY OF THIS REQUEST.
ZDC	ADDITIONAL INFORMATION REQUIRED. PROVIDER, PLEASE SUBMIT A COPY OF YOUR W-9 WITH THIS REQUEST.
ZDQ	ADDITIONAL INFORMATION REQUIRED: PROVIDER, PLEASE SUBMIT MEDICAL RECORDS AND AN ITEMIZED HOSPITAL BILL WITH A COPY OF
	THIS REQUEST.
ZDR	ADDITIONAL INFORMATION REQUIRED: PROVIDER, PLEASE SUBMIT A COPY OF THE PATIENT'S MEDICAL RECORDS WITH A COPY OF THIS
ZDY	ADDITIONAL INFORMATION REQUIRED: PROVIDER, PLEASE SUBMIT DIAGNOSIS/ICD10 CODE AND RELATED CPT4/HCPCS CODES WITH A COPY
	OF THIS REQUEST.
ZEF	INCOMPLETE CLAIM - INVALID DIAGNOSIS CODE. PLEASE CORRECT AND RESUBMIT WITH THIS CLAIM.
ZEK	INCOMPLETE CLAIM - INVALID TYPE OF BILL. PROVIDER, PLEASE CORRECT AND RESUBMIT WITH THIS CLAIM.