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.

Exclusive Provider Organization (EPO) EPO-OAPN1 Open Access Plus In-Network

MHPAEA Summary Form

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 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

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)
Services Subject to Medical Necessity:	Services Subject to Medical Necessity:
All inpatient and outpatient M/S services 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 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 supply(ies) that is at least as likely to produce equivalent	• 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.

In determining whether health care services, supplies, or medications are Medically Necessary, all elements of Medical Necessity must be met as specifically outlined in the individual's benefit plan documents, the Medical Director or Review Organization may rely on the clinical coverage policies maintained by Cigna or the Review Organization.

Clinical coverage policies may incorporate, without limitation and as applicable, criteria relating to U.S. Food and Drug Administration-approved labeling, the standard medical reference compendia and peer-reviewed, evidence-based scientific literature or guidelines.

- 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 medications are Medically Necessary, all elements of Medical Necessity must be met as specifically outlined in the individual's benefit plan documents, the Medical Director or Review Organization may rely on the clinical coverage policies maintained by Cigna or the Review Organization. Clinical coverage policies may incorporate, without limitation and as applicable, criteria relating to U.S. Food and Drug Administration-approved labeling, the standard medical reference compendia and peer-reviewed, evidence-based scientific literature 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 various medical and behavioral health services, therapies, procedures, devices, technologies and pharmaceuticals to be used for utilization management purposes. This includes Coverage Policies that address medical/surgical services determined to be experimental and investigational.

While Cigna's Coverage Policies and vendor guidelines are reviewed at least once annually, re-review of Coverage Policies and/or topics for new Coverage Policies are identified through multiple channels including requests from the provider community, customers, frontline reviewers, CPU and the impetus of new, emerging and evolving technologies.

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

Factors

The Medical Technology Assessment Committee (MTAC) establishes and maintains clinical guidelines and medical necessity criteria in the form of published Coverage Policies pertaining to the various medical and behavioral health services, therapies, procedures, devices, technologies and pharmaceuticals to be used for utilization management purposes. This includes Coverage Policies that address medical/surgical services determined to be experimental and investigational.

MTAC's policy development processes entails assessing behavioral health technologies based upon the following factors:

Clinical efficacy

The Medical Technology Assessment Committee (MTAC) establishes and maintains clinical guidelines and medical necessity criteria in the form of published Coverage Policies pertaining to the various medical and behavioral health services, therapies, procedures, devices, technologies and pharmaceuticals to be used for utilization management purposes. This includes Coverage Policies that address medical/surgical services determined to be experimental and investigational.

While Cigna's Coverage Policies and vendor guidelines are reviewed at least once annually, re-review of Coverage Policies and/or topics for new Coverage Policies are identified through multiple channels including requests from the provider community, customers, frontline reviewers, CPU and the impetus of new, emerging and evolving technologies.

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

Factors

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MTAC's policy development processes entails assessing behavioral health technologies based upon the following factors:

•	Safety	•	Clinical efficacy
•	Appropriateness of the proposed treatment	•	Safety
		•	Appropriateness 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 (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
Sources and Evidentiary Standards	Sources and Evidentiary Standards
Cigna's Coverage Policy Unit (CPU), in partnership with Cigna's Medical Technology Assessment Committee, conducts evidence-based assessments of the medical literature and other sources of information pertaining to the safety and effectiveness of medical and behavioral health services, therapies, procedures, devices, technologies and pharmaceuticals. The Medical Technology Assessment Committee's evidence-based medicine approach ranks the categories of evidence and assigns greater weight to categories with higher levels of scientific evidence as set forth below in Cigna's "Levels of Scientific Evidence Table" adapted from the Centre for Evidence Based Medicine, University of Oxford, March 2009:	Cigna's Coverage Policy Unit (CPU), in partnership with Cigna's Medical Technology Assessment Committee, conducts evidence-based assessments of the medical literature and other sources of information pertaining to the safety and effectiveness of medical and behavioral health services, therapies, procedures, devices, technologies and pharmaceuticals. The Medical Technology Assessment Committee's evidence-based medicine approach ranks the categories of evidence and assigns greater weight to categories with higher levels of scientific evidence as set forth below in Cigna's "Levels of Scientific Evidence Table" adapted from the Centre for Evidence Based 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 4: Descriptive studies, case reports, case series, panel studies (non-experimental studies), and retrospective analyses 	 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.

- of any kind. Also systematic reviews and meta-analyses of retrospective studies.
- Level 5: Professional/organizational recommendations when based upon a valid evidence-based assessment of the available literature.
- Level 4: Descriptive studies, case reports, case series, panel studies (non-experimental studies), and retrospective analyses of any kind. Also systematic reviews and meta-analyses of retrospective studies.
- Level 5: Professional/organizational recommendations when based upon a valid evidence-based assessment of the available literature.
- 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 utilizes its own internally developed Coverage Policies (medical necessity criteria) and the MCG TM Guidelines when conducting medical necessity reviews of M/S services, procedures, devices, equipment, imaging, diagnostic interventions. The Medical Technology Assessment Committee (MTAC) establishes and maintains clinical guidelines and medical necessity criteria in the form of published Coverage Policies pertaining to the various medical and behavioral health services, therapies, procedures, devices, technologies and pharmaceuticals to be used for utilization management purposes. This includes Coverage Policies that address medical/surgical services determined to be experimental and investigational. While Cigna's Coverage Policies and vendor guidelines are reviewed at least once annually, re-review of Coverage Policies and/or topics for new Coverage Policies are identified through multiple channels including requests from the provider community, customers, frontline reviewers, CPU and the impetus of new, emerging and evolving technologies.	Cigna utilizes its own internally developed Coverage Policies (medical necessity criteria) and the MCG TM Guidelines when conducting medical necessity reviews of MH services, procedures, devices, equipment, imaging, diagnostic interventions and the ASAM criteria for conducting medical necessity reviews of SUD services. The Medical Technology Assessment Committee (MTAC) establishes and maintains clinical guidelines and medical necessity criteria in the form of published Coverage Policies pertaining to the various medical and behavioral health services, therapies, procedures, devices, technologies and pharmaceuticals to be used for utilization management purposes. This includes Coverage Policies that address medical/surgical services determined to be experimental and investigational. While Cigna's Coverage Policies and vendor guidelines are reviewed at least once annually, re-review of Coverage Policies and/or topics for new Coverage Policies are identified through multiple channels including requests from the provider community, customers, frontline reviewers, CPU and the impetus of new, emerging and evolving technologies.
Also, the company's routine (occurring no less frequently than annually) Inter-Rater Reliability (IRR) process is used to evaluate	

consistency of clinical decision-making across reviewers and to identify any potential revisions to coverage policies that may be warranted. Of note, the company's most recent MH/SUD IRR exercise did not reveal a need to revise its coverage policies governing reviews of MH/SUD benefits.

Also, the company's routine (occurring no less frequently than annually) Inter-Rater Reliability (IRR) process is used to evaluate consistency of clinical decision-making across reviewers and to identify any potential revisions to coverage policies that may be warranted. Of note, the company's most recent MH/SUD IRR 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

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/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.	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. • certain Medical Pharmaceuticals. • transplant services.	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. • certain Medical Pharmaceuticals.

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)
Inpatient,	The strategy used to design and apply the prior	The strategy used to design and apply the prior
In-Network	authorization/precertification review NQTL to M/S	authorization/precertification review NQTL to MH/SUD
	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 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	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
Outpatient	Outpatient, In-Network office visits do not require prior	Outpatient, In-Network office visits do not require prior
Office Visits, In-	authorization.	authorization.
Network		
All Other	All Other Outpatient Services, In-Network do not require	All Other Outpatient Services, In-Network do not require
Outpatient	prior authorization.	prior authorization.
Services,		<u> </u>
In-Network		

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,	Internal claims data	Internal claims data
In-Network	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
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		
All Other	All Other Outpatient Services, In-Network do not require	All Other Outpatient Services, In-Network do not
Outpatient	prior authorization.	require prior authorization.
Services,		
In-Network		

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, In-Network	Cigna has determined the value of subjecting all inpatient in-network M/S and MH/SUD services to prior authorization/precertification review must exceed the administrative costs by at least 1:1.	Cigna has determined the value of subjecting all inpatient in-network M/S and MH/SUD services to prior authorization/precertification review must exceed 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	No MH/SUD inpatient benefits are subject to fail-first
	step therapy requirements.	and/or step therapy requirements.
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		
All Other	All Other Outpatient Services, In-Network do not require	All Other Outpatient Services, In-Network do not require
Outpatient	prior authorization.	prior authorization.
Services,		
In-Network		

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,	Cigna applies prior authorization NQTL consistently to M/S benefits and MH/SUD benefits across benefit
In-Network	classifications. For both 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 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	Outpatient, In-Network office visits for M/S and MH/SUD benefits do not require prior authorization.
Office	
Visits, In-	
Network	
All Other	All Other Outpatient Services, In-Network do not require prior authorization.
Outpatient	
Services,	
In-Network	

3. Concurrent Review Process

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) Concurrent Determinations	(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	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
	notify you or your representative of the determination within 24 hours after receiving the request.	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	Care Review
	Concurrent Care Review for Inpatient, In-Network M/S	Concurrent Care Review for Inpatient, In-Network
	services is the ongoing assessment to determine medical	MH/SUD services is the ongoing assessment to determine
	necessity of the care provided and appropriateness of the	medical necessity of the care provided and appropriateness
	clinical setting during confinement in a hospital, skilled	of the clinical setting during confinement in a hospital,
	nursing or rehabilitation or other facility. Concurrent	skilled nursing or rehabilitation or other facility. Concurrent
	review is applied to all inpatient benefits, with the	review is applied to all inpatient benefits, with the exception
	exception of any services reimbursed to the provider on a	of any services reimbursed to the provider on a case
	case rate/Diagnostic Resource Group (DRG) basis,	rate/Diagnostic Resource Group (DRG) basis, including
	including non-emergent M/S services:	non-emergent MH/SUD services:
	M/S Inpatient Services Include:	MH/SUD Inpatient Services Include:
	Acute Inpatient Services	Mental Health Acute Inpatient Services
	Subacute Inpatient Services, i.e. Skilled	Mental Health Subacute Residential Treatment
	Nursing Care, physical rehabilitation hospitals,	Mental Health Inpatient Professional Services
	etc.	SUD Acute Inpatient Services
	Inpatient Professional Services	SUD Acute Impatient Detoxification
		SUD 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 Services, In-Network are not	All Other Outpatient Services, In-Network are not subject to
Outpatient	subject to concurrent review.	concurrent review.
Services,		
In-Network		

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

Inpatient, When determining which M/S inpatient benefits are When determining which M/S inpatient benefits are	(MH/SUD) rmining which MH/SUD inpatient benefits are
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 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 conducts a factors: Cost of the conducts a factors: Treatment type and/or geographic region Treatment waste Projected return on investment and/or savings if treatment type is subjected to concurrent care review in optimal clinical outcomes. If the benefit of the treatment type is a driver of high cost gates of the treatment of the treatment of the treatment of the treatment type is a driver of high cost gates of the treatment of	concurrent care medical necessity review, Cigna cost-benefit analysis based upon the following of treatment/procedure her treatment type is a driver of high cost growth bility in cost, quality and utilization based upon costs, treatment type, provider type and/or aphic region hent types subject to a higher potential for fraud, and/or abuse ceted return on investment and/or savings if hent type is subjected to concurrent care review and Appropriateness of concurrent review resulting simal clinical outcomes. fit or value of conducting concurrent care review ment type outweighs the administrative costs with conducting the review, and the concurrent

	costs associated with conducting the review, and the	review is clinically appropriate for the level of care
	concurrent review is clinically appropriate for the level of	according to the applicable clinical criteria of the services,
	care according to the applicable clinical criteria of the	the treatment type is subject to concurrent care medical
	services, the treatment type is subject to concurrent care	necessity review.
	medical necessity review.	
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 Services, In-Network are not	All Other Outpatient Services, In-Network are not subject to
Outpatient	subject to concurrent review.	concurrent review.
Services,		
In-Network		

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)
	o 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-		
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 Services, In-Network are not	All Other Outpatient Services, In-Network are not subject
Outpatient	subject to concurrent review.	to concurrent review.
Services,		
In-Network		

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)
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	the treatment type outweighs the administrative costs
	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 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 M/S inpatient and benefits are subject to fail-first	No MH/SUD inpatient benefits are subject to fail-first
	and/or step therapy requirements.	and/or step therapy requirements.

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 Services, In-Network are not	All Other Outpatient Services, In-Network are not subject to
Outpatient	subject to concurrent review.	concurrent review.
Services,		
In-Network		

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.
	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, In-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, In-	requirement is warranted.	
Network		
All Other	All Other Outpatient Services, In-Network are not subject to concurrent review.	
Outpatient		
Services,		
In-Network		

4. Retrospective Review Process

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)
Retrospective Medical Necessity Review is available for all M/S	Retrospective Medical Necessity Review is available for all
In-Patient, In-Network, and All Other Outpatient In-Network	MH/SUD In-Patient, In-Network, and All Other Outpatient In-
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	Enrollees may request a retrospective medical necessity review by
submitting the request in writing with the supporting medical	submitting the request in writing with the supporting medical
records electronically or by fax or mail. The request for	records electronically or by fax or mail. The request for
retrospective review and supporting clinical information are	retrospective review and supporting clinical information are
referred to a nurse reviewer for review. If the nurse reviewer	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 necessity criteria for the in-network services at issue, the services would be authorized. If the medical records do not support the enrollee met medical necessity criteria for the in-network services at issue, the services would be denied as not medically necessary. For denials of in-network services, participating providers are contractually obligated to hold the enrollee harmless for the services at issue.

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 necessity criteria for the in-network services at issue, the services would be authorized. If the medical records do not support the enrollee met medical necessity criteria for the in-network services at issue, the services would be denied as not medically necessary. For denials of in-network services, participating providers are contractually obligated to hold the enrollee harmless for the services at issue.

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	Mental Health/Substance Use Disorder Benefits
(M/S)	(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 (M/S)	Mental Health/Substance Use Disorder Benefits (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 and All Other Outpatient In-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.

An in operation review of Cigna's application of the Retrospective Review NQTL, specifically approvals and denial information, in the "Outpatient In-Network" classification 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.

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. Emergency 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	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 Condition, a medical screening examination that is within the capability of the emergency department of a Hospital, including ancillary services routinely available to the emergency department to evaluate the Emergency Medical Condition; or a health care item or service furnished or required to evaluate and treat the Emergency Medical Condition; and such further medical examination and treatment, to the extent they are within the capabilities of the staff and facilities available at the Hospital, to Stabilize the patient.

In an emergency situation, you should call 911 for Maryland or other state, county, or local emergency medical services.

Pre-authorization for this service is not required.

Emergency services means, with respect to an Emergency Medical Condition, a medical screening examination that is within the capability of the emergency department of a Hospital, including ancillary services routinely available to the emergency department to evaluate the Emergency Medical Condition; or a health care item or service furnished or required to evaluate and treat the Emergency Medical Condition; and such further medical examination and treatment, to the extent they are within the capabilities of the staff and facilities available at the Hospital, to Stabilize the patient.

In an emergency situation, you should call 911 for Maryland or other state, county, or local emergency medical services.

Pre-authorization for this service is not required.

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)
Emergency medical/surgical services are not subject to prior	Emergency MH/SUD services are not subject to prior
authorization.	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 impairment to bodily function; or
- Serious dysfunction of any bodily organ or part.

- 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 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 (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.

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)

Emergency medical/surgical 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:

- 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 dysfunction of any bodily organ or part.

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:

- 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 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	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
Prior Authorization Requirements	Prior Authorization Requirements

Coverage for certain Prescription Drug Products prescribed to you requires your Physician to obtain prior authorization from Cigna or its Review Organization. The reason for obtaining prior authorization from Cigna is to determine whether the Prescription Drug Product is Medically Necessary in accordance with Cigna's coverage criteria. Coverage criteria for a Prescription Drug Product may vary based on the clinical use for which the Prescription Order or Refill is submitted, and may change periodically based on changes in, without limitation, clinical guidelines or practice standards, or market factors.

If Cigna or its Review Organization reviews the documentation provided and determines that the Prescription Drug Product is not Medically Necessary or otherwise excluded, your plan will not cover the Prescription Drug Product. Cigna, or its Review Organization, will not review claims for excluded Prescription Drug Products or other services to determine if they are 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

Coverage for certain Prescription Drug Products prescribed to you requires your Physician to obtain prior authorization from Cigna or its Review Organization. The reason for obtaining prior authorization from Cigna is to determine whether the Prescription Drug Product is Medically Necessary in accordance with Cigna's coverage criteria. Coverage criteria for a Prescription Drug Product may vary based on the clinical use for which the Prescription Order or Refill is submitted, and may change periodically based on changes in, without limitation, clinical guidelines or practice standards, or market factors.

If Cigna or its Review Organization reviews the documentation provided and determines that the Prescription Drug Product is not Medically Necessary or otherwise excluded, your plan will not cover the Prescription Drug Product. Cigna, or its Review Organization, will not review claims for excluded Prescription Drug Products or other services to determine if they are 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

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.

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 When deciding whether to place a drug on a three-tiered formulary, 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 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 factors considered in deciding to apply a prior authorization requirement, including a quantity limit, to a drug include the risk of adverse safety issues, cost, or risk of inappropriate (i.e., wasteful) utilization. The evidentiary standard used to define whether a drug poses an adverse safety issue is the assessment by clinical experts of available clinical evidence, including, without limitation, FDA labeling, clinical guidelines or clinical literature. This evidence is reviewed in its totality by relevant experts, though certain attributes such as the status of a drug as a controlled substance will, if present, result in application or a prior authorization requirement on the basis of potentially serious adverse safety impacts to enrollees. Controlled substances subject to prior authorization or a quantity limit include ADHD stimulants, which are MH/SUD benefits, and other controlled substances used to treat Med/Surg conditions like opioids for pain management. For other drugs, the FDA's product label generally indicates whether a serious adverse safety risk exists for a drug, though sometimes, such as with opioids, other widelyaccepted clinical guidelines such as CDC guidance may also dictate whether a prior authorization requirement will apply.

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 factors considered in deciding to apply a prior authorization requirement, including a quantity limit, to a drug include the risk of adverse safety issues, cost, or risk of inappropriate (i.e., wasteful) utilization. The evidentiary standard used to define whether a drug poses an adverse safety issue is the assessment by clinical experts of available clinical evidence, including, without limitation, FDA labeling, clinical guidelines or clinical literature. This evidence is reviewed in its totality by relevant experts, though certain attributes such as the status of a drug as a controlled substance will, if present, result in application or a prior authorization requirement on the basis of potentially serious adverse safety impacts to enrollees. Controlled substances subject to prior authorization or a quantity limit include ADHD stimulants, which are MH/SUD benefits, and other controlled substances used to treat Med/Surg conditions like opioids for pain management. For other drugs, the FDA's product label generally indicates whether a serious adverse safety risk exists for a drug, though sometimes, such as with opioids, other widelyaccepted 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	Mental Health/Substance Use Disorder Benefits
(M/S)	(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 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.

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.

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

The processes, factors, and standards are used to determine formulary placement to an MH/SUD or M/S drug are identical. The same formulary committee structure makes decisions with respect to MH/SUD or M/S drugs 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), and uniformity in processes for designing and applying an NQTL can evidence comparability in the NQTL as-written.

Medical/Surgical Benefits

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,

Mental Health/Substance Use Disorder Benefits (MH/SUD)

The processes, factors, and standards are used to determine formulary placement to an MH/SUD or M/S drug are identical. The same formulary committee structure makes decisions with respect to MH/SUD or M/S drugs 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), 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

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

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

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.

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. Prescription Drug Formulary Design

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	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.

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 (M/S)	Mental Health/Substance Use Disorder Benefits (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	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
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.	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 the formulary includes covered preferred brand drugs. Tier 3 of the formulary includes covered non-preferred brand drugs. The brand or generic status of a drug is determined by reference to an algorithm that analyzes available drug indicators, currently including First DataBank's drug indicator file, and not by reference to the drug's status as an M/S or MH/SUD benefit. If the algorithm identifies a covered drug as a generic drug, then the drug is covered	Tier 1 of the formulary includes covered generic drugs. Tier 2 of the formulary includes covered preferred brand drugs. Tier 3 of the formulary includes covered non-preferred brand drugs. The brand or generic status of a drug is determined by reference to an algorithm that analyzes available drug indicators, currently including First DataBank's drug indicator file, and not by reference to the drug's status as an M/S or MH/SUD benefit. If 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 brand drug status is determined by application of the algorithm, a	drug is covered on Tier 1 of the formulary, whether an MH/SUD 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.

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 designated as non-formulary or excluded for one of several possible reasons, whether it is an M/S or MH/SUD benefit. A drug may be designated as non-formulary because it is excluded from coverage by the plan irrespective of medical necessity (e.g. the drug is not FDA-approved, or prescribed to treat a condition not covered by the benefit plan), or because the applicable formulary committee(s) determine after consideration of several factors that it doesn't warrant coverage on the formulary. If the formulary committee identifies that a given brand or generic drug has covered therapeutic alternatives available that project to have lower net cost(s) than the drug in question (inclusive of an assessment of projected ingredient cost expenditures as sourced from claims/reimbursement information and available rebate revenue), then the drug may be designated as non-formulary. Non-formulary drugs

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 designated as non-formulary or excluded for one of several possible reasons, whether it is an M/S or MH/SUD benefit. A drug may be designated as non-formulary because it is excluded from coverage by the plan irrespective of medical necessity (e.g. the drug is not FDA-approved, or prescribed to treat a condition not covered by the benefit plan), or because the applicable formulary committee(s) determine after consideration of several factors that it doesn't warrant coverage on the formulary. If the formulary committee identifies that a given brand or generic drug has covered therapeutic alternatives available that project to have lower net cost(s) than the drug in question (inclusive of an assessment of projected ingredient cost expenditures as sourced 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 covered on Tiers 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 (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
Case Management Case Management is a service provided through a Review Organization, which assists individuals with treatment needs that extend beyond the acute care setting. The goal of Case Management is to ensure that patients receive appropriate care in the most effective setting possible whether at home, as an outpatient, or an inpatient in a Hospital or specialized facility. Should the need for Case Management arise, a Case Management professional will work closely with the patient, his or her family and the attending Physician to determine appropriate treatment options which will best meet the patient's needs and keep costs manageable. The Case Manager will help coordinate the treatment program and arrange for necessary resources. Case Managers are also available to answer questions and provide ongoing support for the family in times of medical crisis.	Case Management Case Management is a service provided through a Review Organization, which assists individuals with treatment needs that extend beyond the acute care setting. The goal of Case Management is to ensure that patients receive appropriate care in the most effective setting possible whether at home, as an outpatient, or an inpatient in a Hospital or specialized facility. Should the need for Case Management arise, a Case Management professional will work closely with the patient, his or her family and the attending Physician to determine appropriate treatment options which will best meet the patient's needs and keep costs manageable. The Case Manager will help coordinate the treatment program and arrange for necessary resources. Case Managers are also available to answer questions and provide ongoing support for the family in times of medical crisis.
Case Managers are Registered Nurses (RNs) and other credentialed health care professionals, each trained in a clinical specialty area such as trauma, high risk pregnancy and neonates, oncology, mental health, rehabilitation or general medicine and surgery. A Case Manager trained in the appropriate clinical specialty area will be assigned to you or your dependent. In addition, Case Managers are supported by a panel of Physician advisors who offer guidance on up-to-date treatment programs and medical technology. While the Case Manager recommends alternate treatment programs and helps coordinate needed resources, the patient's attending Physician remains responsible for the actual medical care.	Case Managers are Registered Nurses (RNs) and other credentialed health care professionals, each trained in a clinical specialty area such as trauma, high risk pregnancy and neonates, oncology, mental health, rehabilitation or general medicine and surgery. A Case Manager trained in the appropriate clinical specialty area will be assigned to you or your dependent. In addition, Case Managers are supported by a panel of Physician advisors who offer guidance on up-to-date treatment programs and medical technology. While the Case Manager recommends alternate treatment programs and helps coordinate needed resources, the patient's attending Physician remains responsible for 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	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 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 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.

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)
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.

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	Mental Health/Substance Use Disorder Benefits
(M/S)	(MH/SUD)
In approving new technology, MTAC uses principles of evidence-	In approving new technology, MTAC uses principles of evidence-
based medicine in its evaluation of the following sources:	based medicine in its evaluation of the following sources:
clinical literature	clinical literature
• FDA approval or clearance, as appropriate, is necessary, but	FDA approval or clearance, as appropriate, is necessary, but
not sufficient, for Cigna to consider a technology to be proven.	not sufficient, for Cigna to consider a technology to be proven.
FDA approval or clearance	FDA approval or clearance
English language peer reviewed publications including	English language peer reviewed publications including
documents prepared by specialty societies and evidence-based	documents prepared by specialty societies and evidence-based
review centers, such as the Agency for Health Care Research	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 (M/S)	Mental Health/Substance Use Disorder Benefits (MH/SUD)
Levels of evidence are assigned to the publications based upon underlying study characteristics, including but not limited to incidence and prevalence of disease, study design, number of subjects, clinical outcomes of relevance, statistics used and significance, and assessment of flaws and bias. A research team performs a synthetic assessment of the literature in order to determine if there is a sufficiently evidence based proven relationship between the intervention and improved health outcomes.	Levels of evidence are assigned to the publications based upon underlying study characteristics, including but not limited to incidence and prevalence of disease, study design, number of subjects, clinical outcomes of relevance, statistics used and significance, and assessment of flaws and bias. A research team performs a synthetic assessment of the literature in order to determine if there is a sufficiently evidence based proven relationship between the intervention and improved health outcomes.
Cigna considers other sources of internal and external information as part of its decision making process including input from health care professionals and other interested parties. Health care professionals may share their comments with the regional market medical executive representing a specific geography, account or subject matter issue. The information is reviewed as part of the annual update process.	Cigna considers other sources of internal and external information as part of its decision making process including input from health care professionals and other interested parties. Health care professionals may share their comments with the regional market medical executive representing a specific geography, account or subject matter issue. The information is reviewed as part of the 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.

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 (M/S)	Mental Health/Substance Use Disorder Benefits (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 network, Cigna takes into consideration an array of factors including, but not limited to provider type and/or specialty; geographic market; supply of provider type and/or specialty; demand for provider type and/or specialty; and provider licensure and/or certification.	When determining whether to admit a provider into its provider network, Cigna takes into consideration an array of factors including, but not limited to provider type and/or specialty; geographic market; supply of provider type and/or specialty; demand for provider type and/or specialty; and provider licensure and/or certification.

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)
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	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 	 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 Proof of adequate professional liability insurance coverage	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 • Proof of adequate professional liability insurance coverage
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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	Cigna follows NCQA, CMS, state and federal requirements and
guidelines for each provider and/or specialty type. The standard	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.

• Proof of adequate professional liability insurance coverage

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

Health Aides are not individually credentialed or contracted directly, the Home Health Agency is contracted and credentialed as an entity (facility or clinic). Cigna does not contract directly with most of these types of providers but rather, with the entity they work for. If certifications are available for paraprofessionals, 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 (M/S)	Mental Health/Substance Use Disorder Benefits (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 (M/S)	Mental Health/Substance Use Disorder Benefits (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 (M/S)	Mental Health/Substance Use Disorder Benefits (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. Restrictions that Limit Duration or Scope of Benefits for 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)
Cigna has a National Network that includes providers within the United States. Cigna's policies do not cover anything other than urgent or emergent services if rendered outside of the United	Cigna has a National Network that includes providers within the United States. Cigna's policies do not cover anything other than 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	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.

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	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.

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. Restrictions for Provider Specialty

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 (M/S)	Mental Health/Substance Use Disorder Benefits (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. Reimbursement for INN Providers, OON Providers, INN Facilities, OON Facilities (separately)

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)	In-Network Providers (All Other Outpatient Services)				
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 Facilities	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.

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.

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

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

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

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)				
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)

Cigna's in-network provider reimbursement methodology is based upon 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 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.

In-Network Facilities

Cigna's in-network provider reimbursement methodology is based upon 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 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.

In-Network Providers (All Other Outpatient Services)

Cigna's in-network provider reimbursement methodology is based upon 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 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.

In-Network Facilities

Cigna's in-network provider reimbursement methodology is based upon 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 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.

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 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. 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)

Standard reimbursement rates for 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

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. 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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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.

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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)

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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.

Health Plan

Health Plan		IEPO-OAPN1 O	PEN ACCESS PLUS	S IN-INL I WORK		
Benefit	Classification	# of Authorization Requests Received	# of Authorization Requests Approved	# of Authorization Requests Denied	% Approved	% Denied
Mental Health Benefits	INN-Inpatient	0	0	0	#DIV/0!	#DIV/0!
	OON-Inpatient	0	0	0	#DIV/0!	#DIV/0!
	Emergency Services	0	0	0	#DIV/0!	#DIV/0!
	RX	77	46	31	60%	40%
	INN-Outpatient-Office	0	0	0	#DIV/0!	#DIV/0!
	OON-Outpatient-Office	0	0	0	#DIV/0!	#DIV/0!
	INN-Outpatient-AllOther	0	0	0	#DIV/0!	#DIV/0!
	OON-Outpatient- AllOther	0	0	0	#DIV/0!	#DIV/0!
Substance Use Disorder Benefits	INN-Inpatient	0	0	0	#DIV/0!	#DIV/0!
	OON-Inpatient	0	0	0	#DIV/0!	#DIV/0!
	Emergency Services	0	0	0	#DIV/0!	#DIV/0!
	RX	0	0	0	#DIV/0!	#DIV/0!
	INN-Outpatient-Office	0	0	0	#DIV/0!	#DIV/0!
	OON-Outpatient-Office	0	0	0	#DIV/0!	#DIV/0!
	INN-Outpatient-AllOther	0	0	0	#DIV/0!	#DIV/0!
	OON-Outpatient- AllOther	0	0	0	#DIV/0!	#DIV/0!
Medical /Surgical Benefits	INN-Inpatient	0	0	0	#DIV/0!	#DIV/0!
	OON-Inpatient	0	0	0	#DIV/0!	#DIV/0!
	Emergency Services	0	0	0	#DIV/0!	#DIV/0!
	RX	825	581	244	70%	30%

EPO-OAPN1 OPEN ACCESS PLUS IN-NETWORK

Health Plan		EPO-OAPN1 O	PEN ACCESS PLUS	S IN-NETWORK		
	INN-Outpatient-Office	0	0	0	#DIV/0!	#DIV/0
	OON-Outpatient-Office	0	0	0	#DIV/0!	#DIV/0!
	INN-Outpatient-AllOther	1	1	0	100%	0%
	OON-Outpatient- AllOther	0	0	0	#DIV/0!	#DIV/0!
	Network Status Unknown-Outpatient- AllOther	3	3	0	100%	0%

	AllOther						
Benefit	Classification	# of Claims Submitted	# of Claims	# of Claims Denied	% Approved	% Denied	Reasons for Denial of Claims
Mental Health Benefits	INN-Inpatient	140	127	13	91%	9%	1487,1719,1647,1705,45,175 3
	OON-Inpatient	20	18	2	90%	10%	1091
	Emergency Services	56	48	8	86%	14%	1487,1091,720,1745,720
	RX	11579	9409	2170	81%	19%	ET,79,88,8R,77,04,83,7X,70,7M,85,7V,76,22,65,75,,78
	INN-Outpatient-Office	8780	8333	447	95%	5%	1745,1005,1600,1719,1331,1 747,1705,1702,1720,1736,17 10,1244,1790,1487,1091,720, 1759,45,1753,1756,1649,132
	OON-Outpatient-Office	658	540	118	82%	18%	9 1934,1759,1756,1274,1091,1 745,45,1329,1719,1720,720,1
	INN-Outpatient-AllOther	1038	980	58	94%	6%	650 720,1790,1091,1774,1802,14 87,1647,1637,1274,1875,164 9,1574,45,1005,1966,1719,17 02,1720,1710,1736
	OON-Outpatient- AllOther	87	82	5	94%	6%	1745,1599,45
Substance Use Disorder Benefits	INN-Inpatient	33	30	3	91%	9%	1274,1005,1802
	OON-Inpatient	12	10	2	83%	17%	17021745
	Emergency Services	22	16	6	73%	27%	1705,1091,720,1091
	RX	130	117	13	90%	10%	70,65 ,79,76,88
	INN-Outpatient-Office	121	118	3	98%	2%	1716,1244
	OON-Outpatient-Office	12	12	0	100%	0%	0
	INN-Outpatient-AllOther	230	217	13	94%	6%	1976,720,1778,45
	OON-Outpatient-	13	10	3	77%	23%	1650
Medical /Surgical Benefits	AllOthor INN-Inpatient	3164	3018	146	95%	5%	1000,1738,1340,1747,1244,7 20,1243,1716,1091,1790,164 7,1745,45,1754,1767,1649,17 53,1707,27,1756,1337,1005,1 770,320,1719,1705,1317,170 2,1720
	OON-Inpatient	418	397	21	95%	5%	1706,1648,1719,1738,1243,1 091,1756,45

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

Health Plan		EPO-OAPN1 O	PEN ACCESS PLUS	S IN-NETWORK]	
	Emergency Services	5933	5440	493	92%		1710,1650,720,1745,1790,10 00,1344,1649,1756,45,1339,1 649,1600,1698,1005,1702,10 91,1710,1957,1705,45,1720,2 7,1747,1756,1859,1860,1244, 1719,1736,320,1716,1721,72 0,1714,1711,1719,1957,1790, 1091,1313,1702
	RX	55899	41855	14044	75%	25%	9E,895,ET,77 ,8K,04,7V,78,88,75,816,,QS, MR,9G,7X,EZ,54,34,79,23,E7 ,41,606,8R,8E,85,R9,28,81 ,83,56,22,76,65 ,7M,70,E3,AG,PE,60
	INN-Outpatient-Office	44496	39215	5281	88%	12%	1501,1790,1487,1248,1702,1 720,1698,1747,348,1244,173 6,1697,1647,1710,1243,1716, 1714,1336,720,1721,1957,15 14,1759,27,1649,1753,1494,1 344,1091,1895,212,45,1756,1 745,1600,1005,1329,1868,17 11,1712,1730,1703,1285,133 7,1729,1339,1719,1705
	OON-Outpatient-Office	877	742	135	85%	15%	1574,1745,45,1599,1719,128 5,1648,1710,1702,1790,1244, 1650,1716,720,1231,1091
	INN-Outpatient-AllOther	22027	20443	1584	93%	7%	1514,1313,1091,1898,1827,1 649,1756,1920,1053,1285,17 53,1707,1337,1600,1730,187 5,1954,27,1605,1703,45,1335 ,1224,1005,1879,1745,1973,1 740,1494,1704,1611,1317,34 8,1705,1574,1702,1366,1775, 1710,1719,1859,1698,1928,1 925,1860,1720,1513,1966,10 46,1244,1790,1340,1716,148 7,1778,1736,1647,1714,1738, 1894,1747,1774,720,1839,19 57,1243,1336
	OON-Outpatient- AllOther	2443	2028	415	83%		1966,1740,1928,1710,1698,1 244,1702,1738,1720,1790,72 0,1495,1243,1778,1487,1650, 1774,1647,1957,1231,1091,4 5,1600,1599,1703,1907,1719

Denial Cod	de Denial Meaning
04	M/I PROCESSOR CONTROL NUMBER
09	M/I DATE OF BIRTH
11	M/I PATIENT RELATIONSHIP CODE
13	M/I OTHER COVERAGE CODE
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
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
212	HEALTH FOR PROCESSING.
320	CHARGES FOR TREATMENT OF INTENTIONALLY SELF-INFLICTED INJURY OR TREATMENT OF CONDITIONS RESULTING FROM OR IN ANY WAY
320	RELATED TO THAT INJURY ARE NOT COVERED UNDER YOUR PLAN.
240	
348	THIS AMOUNT WAS PREVIOUSLY PAID UNDER A DIFFERENT CLAIM NUMBER. BRAND DRUG/SPECIFIC LABELER CODE REQUIRED
606	
816	PHARMACY BENEFIT EXCLUSION, MAY BE COVERED UNDER PATIENT'S MEDICAL BENEFIT
895	
1000	ALLOWED NUMBER OF OVERRIDES EXHAUSTED
	THESE BENEFITS WERE REDUCED OR DENIED BECAUSE THE PRE- ADMISSION REVIEW PROCEDURES OUTLINED IN THE PLAN WERE NOT
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1223	SERVICES ARE REDUCED OR DENIED FOR NO BEHAVIORAL HEALTH AUTHORIZATION ON FILE. QUESTIONS SHOULD BE DIRECTED TO CIGNA
	HEALTHCARE MEMBER SERVICES DEPARTMENT INDICATED ON THE BACK OF THE MEMBER S ID CARD. SUBMIT APPEAL INFORMATION TO
	EVERNORTH BEHAVIORAL HEALTH, APPEALS, P. O. BOX 188064, CHATTANOOGA, TN 37422.
1224	THIS CHARGE IS DENIED. THE PROCEDURE CODE SUBMITTED DOES NOT DESCRIBE THE PROCEDURE NOTED IN THE OPERATIVE REPORT OR OFFICE NOTES. THE PATIENT IS NOT RESPONSIBLE TO PAY THIS AMOUNT.
1244	CODE FOR DOCUMENTATION PURPOSES ONLY. NO SEPARATE REIMBURSEMENT WARRANTED. NOT PAID. DO NOT BILL MEMBER.
1274	OUR RECORDS DO NOT REFLECT AN AUTHORIZATION ON FILE AND ADDITIONAL INFORMATION FROM THE HEALTH CAREPROVIDER IS NEEDED TO REVIEW THE CLAIM FOR MEDICAL NECESSITY. PLEASE SUBMIT FACILITY RECORDS, OFFICE NOTES, AND HISTORY, PHYSICAL & DIAGNOSTIC REPORTS TO: CIGNA HEALTHSOLUTIONS, PO BOX 188064, CHATTANOOGA, TN 37422. IF WE DON'T RECEIVE THE INFORMATION WE'LL HAVE TO CLOSE THE CLAIM.
1285	THIS CHARGE IS DENIED BECAUSE THE IMMUNIZATION WAS SUPPLIED BY YOUR STATE. PLEASE CONTACT YOUR STATE FOR INFORMATION. THE PATIENT IS NOT RESPONSIBLE TO PAY THIS AMOUNT.
1317	MUTUALLY EXCLUSIVE - ONE OF THE BILLED PROCEDURES HAS BEEN DENIED BECAUSE IT IS NOT TYPICALLY PERFORMED ON THE SAME DATE OF SERVICE AS THE OTHER BILLED PROCEDURES THE PATIENT IS NOT RESPONSIBLE TO PAY THIS AMOUNT.
1329	THIS CHARGE IS DENIED BECAUSE OF EITHER A MISSING NPI, ATTENDING/RENDERING PHYSICIAN NAME, OR CREDENTIALS. PLEASE RESUBMIT A CORRECTED CLAIM WITH THIS INFORMATION AND SEND IT TO THE CLAIM ADDRESS INDICATED ON THE BACK OF THE MEMBER SID CARD. THE PATIENT IS NOT RESPONSIBLE TO PAY THIS AMOUNT.
1330	THIS CHARGE IS DENIED BECAUSE OF A MISSING OR INVALID CPT/HCPCS CODE(S). PLEASE RE-SUBMIT A CORRECTED CLAIM WITH THE APPROPRIATE CPT/HCPCS CODE(S) AND SEND IT TO THE CLAIM ADDRESS INDICATED ON THE BACK OF THE MEMBER'S ID CARD. THE PATIENT IS NOT RESPONSIBLE TO PAY THIS AMOUNT
1331	THIS CHARGE IS DENIED BECAUSE OF A MISSING OR INVALID DAYS OR UNITS. PLEASE RE-SUBMIT A CORRECTED CLAIM WITH THIS INFORMATION AND SEND IT TO THE CLAIM ADDRESS INDICATED ON THE BACK OF THE MEMBER'S ID CARD. THE PATIENT IS NOT RESPONSIBLE TO PAY THIS AMOUNT.
1335	THIS CHARGE IS DENIED BECAUSE OF A MISSING OR INVALID DATE(S) OF SERVICE. PLEASE RE-SUBMIT A CORRECTED CLAIM WITH THE APPROPRIATE DATE(S) OF SERVICE AND SEND IT TO THE CLAIM ADDRESS INDICATED ON THE BACK OF THE MEMBER'S ID CARD. THE PATIENT IS NOT RESPONSIBLE TO PAY THIS AMOUNT.
1336	THIS CHARGE IS DENIED BECAUSE OF A MISSING OR INVALID ICD DIAGNOSIS CODE(S). PLEASE RE-SUBMIT A CORRECTED CLAIM WITH THE APPROPRIATE ICD DIAGNOSIS CODE(S) AND SEND IT TO THE CLAIM ADDRESS INDICATED ON THE BACK OF THE MEMBER'S ID CARD. THE PATIENT IS NOT RESPONSIBLE TO PAY THIS AMOUNT.
1337	THIS CHARGE IS DENIED BECAUSE OF AN INVALID DIAGNOSIS OR PROCEDURE CODE WITH PATIENT'S AGE AND/OR GENDER PLEASE RE- SUBMIT A CORRECTED CLAIM WITH THE APPROPRIATE DIAGNOSIS OR PROCEDURE CODE FOR THIS PATIENT'S AGE AND/OR GENDER AND SEND IT TO THE CLAIM ADDRESS INDICATED ON THE BACK OF THE MEMBER'S ID CARD. THE PATIENT IS NOT RESPONSIBLE TO PAY THIS
1339	THIS CHARGE IS DENIED BECAUSE OF AN INCOMPLETE BILLING. PLEASE RE-SUBMIT A CORRECTED CLAIM IDENTIFYING ALL PAGES OF THE BILL AND SEND IT TO THE CLAIM ADDRESS INDICATED ON THE BACK OF THE MEMBER'S ID CARD. THE PATIENT IS NOT RESPONSIBLE TO PAY THIS
1340	THIS CHARGE IS DENIED BECAUSE OF A MISSING OR INVALID MODIFIER. PLEASE RE-SUBMIT A CORRECTED CLAIM WITH THE CORRECT MODIFIER AND SEND IT TO THE CLAIM ADDRESS INDICATED ON THE BACK OF THE MEMBER'S ID CARD. THE PATIENT IS NOT RESPONSIBLE TO PAY THIS AMOUNT.
1342	THIS CHARGE IS DENIED BECAUSE AN OUTPATIENT INTERIM BILL HAS BEEN RECEIVED. PLEASE RE-SUBMIT A COMPLETE UB92 FOR THIS SAME DATE OF SERVICE AND SEND IT TO THE CLAIM ADDRESS INDICATED ON THE BACK OF THE MEMBER'S ID CARD. THE PATIENT IS NOT RESPONSIBLE TO PAY THIS AMOUNT.
1343	THIS CHARGE IS DENIED BECAUSE OF A MISSING OR INVALID PATIENT STATUS CODE. PLEASE RE-SUBMIT A CORRECTED CLAIM WITH THE APPROPRIATE PATIENT STATUS CODE AND SEND IT TO THE CLAIM ADDRESS INDICATED ON THE BACK OF THE MEMBER'S ID CARD. THE PATIENT IS NOT RESPONSIBLE TO PAY THIS AMOUNT.
1344	THIS CHARGE IS DENIED BECAUSE OF A MISSING OR INVALID PLACE OF SERVICE CODE. PLEASE RE-SUBMIT A CORRECTED CLAIM WITH THE APPROPRIATE PLACE OF SERVICE CODE AND SEND IT TO THE CLAIM ADDRESS INDICATED ON THE BACK OF THE MEMBER'S ID CARD. THE PATIENT IS NOT RESPONSIBLE TO PAY THIS AMOUNT.
1346	THIS CHARGE IS DENIED BECAUSE OF A MISSING OR INVALID TYPE OF BILL. PLEASE RE-SUBMIT A CORRECTED CLAIM WITH THE APPROPRIATE TYPE OF BILL CODE AND SEND IT TO THE CLAIM ADDRESS INDICATED ON THE BACK OF THE MEMBER'S ID CARD. THE PATIENT IS NOT RESPONSIBLE TO PAY THIS AMOUNT.
1363	THIS CHARGE IS DENIED BECAUSE OF A MISSING INVOICE COST. PLEASE RE-SUBMIT A CORRECTED CLAIM THAT INCLUDES THE INVOICE COST AND SEND IT TO THE CLAIM ADDRESS INDICATED ON THE BACK OF THE MEMBER'S ID CARD. THE PATIENT IS NOT RESPONSIBLE TO PAY THIS
1365	THIS CHARGE IS DENIED BECAUSE THE PROVIDER MUST SUBMIT THE LAB SERVICE DIRECTLY TO JOINT VENTURE HOSPITAL (JVHL). THE PATIENT IS NOT RESPONSIBLE TO PAY THIS AMOUNT.
1366	THIS CHARGE IS DENIED BECAUSE OF THE PROVIDER'S INCORRECT NAME, TAX IDENTIFICATION NUMBER/HPFIN COMBINATION. PLEASE RESUBMIT A CORRECTED CLAIM WITH THE CORRECT PROVIDER'S NAME/TIN/HPFIN COMBINATION AND SEND IT TO THE CLAIM ADDRESS INDICATED ON THE BACK OF THE MEMBER'S ID CARD. THE PATIENT IS NOT REPONSIBLE TO PAY THIS AMOUNT.
1373	AFTER REVIEW OF THE MEDICAL RECORDS SUBMITTED, THESE CHARGES ARE NOT BEING CONSIDERED BECAUSE THEY WERE NOT DOCUMENTED IN THE PROVIDER'S RECORDS. THE PATIENT IS NOT RESPONSIBLE TO PAY THIS AMOUNT.
1487	MEDICAL DIRECTOR DECISION TO DENY OR PARTIALLY DENY COVERAGE AS NOT MEDICALLY NECESSARY. AN EXPLANATION WAS SENT IN A SEPARATE LETTER. THE PATIENT IS NOT RESPONSIBLE FOR DENIED CHARGES.
1494	THIS SERVICE IS NOT COVERED BECAUSE IT IS CONSIDERED EXPERIMENTAL, INVESTIGATIONAL OR UNPROVEN FOR ALL INDICATIONS.
1501	ON THE CLAIM SUBMITTED, THE SERVICES AND/OR UNITS BILLED DO NOT MATCH THOSE THAT CIGNA APPROVED. THE CUSTOMER IS 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
1313	MEDICALLY NECESSARY. A DETAILED EXPLNATION WILL BE SENT SEPARATELY. DO NOT BILL THE PATIENT. SEND APPEAL 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
1314	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
1332	FOR PAYMENT.
1543	PAYMENT FOR THIS SERVICE IS DENIED. THE FREQUENCY LIMITATION SET BY THE PLAN'S PAYMENT POLICY FOR THIS CODE HAS BEEN
20.0	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
	NOT RESPONSIBLE FOR PAYMENT.
1568	THIS CHARGE IS DENIED. THE PROCEDURE CODE SUBMITTED WAS INAPPROPRIATELY CODED BASED ON THE INFORMATION INDICATED ON
4570	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
4574	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
1576	RESPONSIBLE FOR PAYMENT. 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
1370	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
1600	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 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
1011	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.
1614	HEALTH CARE PROFESSIONAL: THE DATE OF SERVICE IS NOT WITHIN THE APPROVED CIGNA RADIATION THERAPY PROGRAM TREATMENT
_01 +	PLAN DATES. 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.
1637	PROVIDER: WE ARE UNABLE TO DETERMINE IF THE SERVICES PERFORMED ARE PART OF A PROGRAM OR IF THEY ARE INDIVIDUAL SERVICES.
1	PLEASE PROVIDE THE CORRECT REVENUE/PROCEDURE CODE(S) AND A BRIEF DESCRIPTION OF THE SERVICES BEING PERFORMED. PLEASE
1	SUBMIT TO: CIGNA HEALTHSOLUTIONS, PO BOX 188064 CHATTANOOGA, TN 37422. IF WE DON'T RECEIVE THE INFORMATION WE'LL HAVE TO
<u> </u>	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
1010	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
4676	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
	PROCEDURE CODE(S) IS NOT APPLICABLE. TO RECEIVE PATIMENT, PLEASE RESUBINITY 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
1898	REHABILITATIVE SERVICES SECTION OF YOUR PLAN BOOKLET. 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
1300	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
	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.
1943	EXCESS UNITS ARE DENIED. PLEASE SUBMIT A CORRECTED CLAIM WITH THE JW MODIFIER IF DENIED UNITS ARE DUE TO WASTE. CUSTOMER
	IS NOT LIABLE.
1954	THIS CODE IS ASSOCIATED WITH A PRIMARY SERVICE THAT WAS PREVIOUSLY DENIED. VISIT CIGNAFORHCP.COM FOR A COPY OF OUR
	REIMBURSEMENT POLICIES.
1954	THIS CODE IS ASSOCIATED WITH A PRIMARY SERVICE THAT WAS PREVIOUSLY DENIED. VISIT CIGNAFORHCP.COM FOR A COPY OF OUR
1055	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 1966	THE SUBMITTED CODE IS DENIED BECAUSE IT'S RELATED TO A SERVICE THAT YOUR PLAN DOESN'T COVER. PLEASE REFER TO YOUR PLAN
1900	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
1300	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
1370	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	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.

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.
<u>'</u>	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.
@T	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
Ό,	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS A COMPONENT OF ANOTHER PROCEDURE OR SERVICE THAT WAS BILLED ON THE
	SAME DATE OF SERVICE.
`P	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.
Ύ.	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
~P	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
	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
	PATIENT'S ID CARD.
4A	DOCTOR: YOU DID NOT OBTAIN PRECERTIFICATION FOR THIS PROCEDURE THROUGH THE CIGNA RADIATION THERAPY PROGRAM. PLEASE
	CALL 866.668.9250 WITH QUESTIONS.
4B	DOCTOR: NO MORE QUANTITIES ARE AVAILABLE FOR THIS PROCEDURE CODE THROUGH CIGNA'S RADIATION THERAPY PROGRAM. PLEASE
	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
10	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
6Z	866.668.9250 WITH QUESTIONS. PROVIDER NOT ELIGIBLE TO PERFORM SERVICE/DISPENSE PRODUCT
7A	PROVIDER DOES NOT MATCH AUTHORIZATION ON FILE
7M	DISCREPANCY BETWEEN OTHER COVERAGE CODE AND OTHER COVERAGE INFORMATION ON FILE
7V	DUPLICATE FILL NUMBER
7W	NUMBER OF REFILLS AUTHORIZED EXCEED ALLOWABLE REFILLS
7X	DAYS SUPPLY EXCEEDS PLAN LIMITATION
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.
ВВ	SERVICES ARE NOT COVERED BY THE CONTRACT. PLEASE REFER TO THE PLAN DOCUMENT.
BJ	STATE-SUPPLIED IMMUNIZATION.
BN	SERVICES NOT COVERED OUT OF NETWORK OR ARE AVAILABLE IN MEMBER'S NETWORK. PLEASE CALL MEMBER SERVICES AT THE NUMBER ON YOUR ID CARD WITH QUESTIONS.
ВО	DENIED COVERED UNDER GLOBAL MA
BT	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	INAPPROPRIATE BILLING
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.
e11	THE SUBMITTED PROCEDURE CODE IS DISALLOWED BECAUSE IT IS INCONSISTENT WITH THE PATIENT'S AGE.
e12	THIS PROCEDURE CODE IS DISALLOWED BECAUSE THE RELATED PRIMARY SERVICE WAS EITHER NOT BILLED OR DENIED.
e14 e19	THE PROCEDURE CODE IS DISALLOWED BECAUSE THE RELATED PRIMARY SERVICE WAS EITHER NOT BILLED OR DENIED. 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
620	DISALLOWED.
e27	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS INCIDENTAL TO A CODE BILLED ON THE SAME DATE OF SERVICE.
e27	
629	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS A COMPONENT OF ANOTHER PROCEDURE OR SERVICE THAT WAS BILLED ON THE
F2	SAME DATE OF SERVICE.
E3	M/I INCENTIVE AMOUNT SUBMITTED
e31	THIS SERVICE IS NOT ALLOWED BECAUSE IT IS PART OF A CMS NCCI COLUMN 1/COLUMN 2 EDIT.
e32	THE SUPPLY IS NOT SEPARATELY REIMBURSED IN ADDITION TO THE SURGICAL SERVICE THAT WAS SUBMITTED ON THE SAME DATE OF
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
_	HAS BEEN EXCEEDED.
E84	PROVIDER: INCONSISTENT WITH INDUSTRY STANDARDS, THE CPT/HCPCS CODE IS MISSING FOR THE REVENUE CODE SUBMITTED. RESUBMIT A
	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
	PREVIOUSLY CONSIDERED.
f53	THE SUBMITTED CODE IS DISALLOWED AS IT IS ASSOCIATED WITH AN INJURY OR ILLNESS THAT OCCURRED IN THE WORKPLACE.
f54	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
	ANY OTHER PROCEDURE.
g30	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS INCIDENTAL TO A CODE BILLED ON THE SAME DATE OF SERVICE FOR A PRIOR
g32	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS MUTUALLY EXCLUSIVE TO A CODE BILLED ON THE SAME DATE OF SERVICE FOR A
	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
	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
	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
_	SEPARATE CLAIM.
g46	THIS POST-OPERATIVE SRVC/MEDICAL VISIT IS INCLUDED IN AND CONSIDERED PART OF AN ASSOCIATED SURGICAL PROCEDURE SUBMITTED
	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
0	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
3	CARE PROFESSIONAL.
GI	IPAYMENT EXCEPTION WILL NOT BE MADE, YOU CAN'T BILL PATIENT, PLEASE SEND APPEALS TO MEDSOLLITIONS, 730 COOL SPRINGS RIVD
GL	PAYMENT EXCEPTION WILL NOT BE MADE. YOU CAN'T BILL PATIENT. PLEASE SEND APPEALS TO MEDSOLUTIONS, 730 COOL SPRINGS BLVD., STE 800, FRANKLIN, TN 37067.

HD	BASED UPON THE INFORMATION REPORTED OR CONTAINED IN THE FILE, SERVICES WERE NOT RENDERED AS BILLED. THE PATIENT IS NOT
	RESPONSIBLE FOR THIS AMOUNT.
I-	THE CODE IS DISALLOWED DUE TO A PREVIOUSLY RECEIVED CLAIM WITH A PRIMARY SERVICE BILLED WITH A QUANTITY GREATER THAN ONE.
l;	THE SUBMITTED CONSULTATION CODE IS DISALLOWED BECAUSE A CONSULTATION CODE FOR AN OUTPATIENT STAY WAS PREVIOUSLY SUBMITTED.
1[THE SUBMITTED CODE IS DISALLOWED DUE TO A PRIOR CLAIM. PER CMS, THE SUBMITTED CODE IS ALWAYS BUNDLED WHEN BILLED WITH ANY OTHER PROCEDURE.
Iv.	ANESTHESIA SERVICES ARE NOT WARRATNED FOR THIS PROCEDURE OR SERVICE.
1,	THIS PROCEDURE CODE IS DISALLOWED BECAUSE THE RELATED PRIMARY SERVICE WAS EITHER NOT BILLED OR DENIED.
- +	ACCORDING TO CMS, THIS PROCEDURE IS ALWAYS BUNDLED WHEN BILLED WITH ANY OTHER PROCEDURE, SO THE SUBMITTED CODE IS
	DISALLOWED.
13	THIS POST-OPERATIVE SERVICE/MEDICAL VISIT IS INCLUDED IN AND CONSIDERED PART OF THE ASSOCIATED SURGICAL PROCEDURE SUBMITTED ON THIS CLAIM.
15	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS INCIDENTAL TO A CODE BILLED ON THE SAME DATE OF SERVICE FOR A PRIOR
16	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS MUTUALLY EXCLUSIVE TO A CODE BILLED ON THE SAME DATE OF SERVICE FOR A PRIOR CLAIM.
17	CCI-THIS PROCEDURE CODE REPRESENTS SERVICES INTEGRAL TO THE MORE COMPLEX PRIMARY PROCEDURE SUBMITTED ON THIS CLAIM.
i92	THE MEDICAL VISIT IS INCLUDED IN AND CONSIDERED PART OF THE SURGICAL PROCEDURE PERFORMED ON THE SAME DATE OF SERVICE SUBMITTED ON THIS CLAIM
IC	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS INCIDENTAL TO A CODE BILLED ON THE SAME DATE OF SERVICE.
IG	THIS SERVICE IS NOT COVERED BECAUSE IT IS CONSIDERED EXPERIMENTAL, INVESTIGATIONAL OR UNPROVEN FOR ALL INDICATIONS.
IH	
l _{iu}	THIS MEDICAL VISIT IS INCLUDED IN AND CONSIDERED PART OF THE ASSOCIATED SURGICAL PROCEDURE ON THE SAME DATE OF SERVICE AND
<u> </u>	SUBMITTED ON THIS CLAIM.
II	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT IS MUTUALLY EXCLUSIVE TO A CODE BILLED ON THE SAME DATE OF SERVICE.
IM	THE SUBMITTED PROCEDURE IS DISALLOWED BECAUSE IT DOES NOT TYPICALLY REQUIRE AN ASSISTANT SURGEON.
IX	THE BILLED PROCEDURE CODE WAS DISALLOWED. A SIMILAR AND/OR MORE ACCURATE PROCEDURE CODE WAS APPLIED TO THE CLAIM FOR REIMBURSEMENT.
j16	SERVICES BILLED WITH MODIFIER TC ON A PROFESSIONAL CLAIM IN A FACILITY PLACE OF SERVICE ARE INCLUDED IN THE FACILITY REIMBURSEMENT.
J4	CODE FOR DOCUMENTATION PURPOSES ONLY. NO SEPARATE REIMBURSEMENT WARRANTED. NOT PAID. DO NOT BILL MEMBER.
i59	UNITS FOR THIS AND PREVIOUSLY SUBMITTED CLAIM(S) EXCEED THE MAXIMUM UNITS ALLOWED PER DATE OF SERVICE. THE SUBMITTED
,	UNITS ARE DISALLOWED.
JP	SVC DENIED-NO PCP SELECTED
K-	THE SERVICE IS DISALLOWED. THE MODIFIER AND CODE COMBINATION IS INVALID. APPEALS REQUIRE THE FACILITY NAME, ADDRESS AND TIN WHERE RENDERED.
K"	THE NEW PATIENT PROCEDURE CODE SUBMITTED IS DISALLOWED. IT IS REPLACED BY AN ESTABLISHED PATIENT PROCEDURE CODE.
K#	THE PROCEDURE IS DISALLOWED BECAUSE THIS SERVICE OR A COMPONENT OF THIS SERVICE WAS PREVIOUSLY BILLED BY ANOTHER HEALTH
	CARE PROFESSIONAL.
K(MODIFIER 26 IS ADDED TO THE SUBMITTED CODE DENOTING THE PROFESSIONAL COMPONENT WAS PERFORMED IN A FACILITY SETTING.
K.	HEALTH CARE PROFESSIONAL ONLY: SERVICE IS DENIED. IT'S PART OF A CMS NCCI COLUMN1/COLUMN 2 EDIT THAT INCLUDES A SERVICE ON A PRIOR CLAIM.
K]	THE QUANTITY OF UNITS ON THE CLAIM, IN ADDITION TO BILLED UNITS ON A PREVIOUSLY SUBMITTED CLAIM, EXCEEDS THE MEDICALLY UNLIKELY EDIT LIMIT.
K^	THE PROCEDURE IS DISALLOWED BECAUSE THIS SERVICE OR A COMPONENT OF THIS SERVICE WAS PREVIOUSLY BILLED BY ANOTHER HEALTH
1/	CARE PROFESSIONAL.
K_	THE QUANTITY OF UNITS BILLED EXCEEDS THE MEDICALLY UNLIKELY EDIT LIMIT.
K{	THE QUANTITY OF UNITS BILLED EXCEEDS THE MEDICALLY UNLIKELY EDIT LIMIT.
K	THE QUANTITY OF UNITS BILLED EXCEEDS THE MEDICALLY UNLIKELY EDIT LIMIT.
K<	HEALTH CARE PROFESSIONAL ONLY: CIGNA DOESN T ALLOW THIS SERVICE. IT S PART OF A CMS NCCI COLUMN1/COLUMN 2 EDIT.
K=	THE QUANTITY OF UNITS FOR THIS SERVICE, IN ADDITION TO BILLED UNITS ON A PRIOR CLAIM, EXCEEDS THE MEDICALLY UNLIKELY EDIT
K1	BASED ON THE INFORMATION WE HAVE AVAILABLE, THE SERVICES OR SUPPLIES ON THIS CLAIM ARE NOT MEDICALLY NECESSARY.
K3	HEALTH CARE PROFESSIONAL: WE HAVE RECEIVED YOUR CLAIM FOR A NON-PAYABLE SERVICE. VISIT CIGNAFORHCP.COM TO VIEW OUR REIMBURSEMENT POLICIES.
K4	HEALTH CARE PROFESSIONAL: WE HAVE RECEIVED YOUR CLAIM FOR A NON-PAYABLE SERVICE. VISIT CIGNAFORHCP.COM TO VIEW OUR REIMBURSEMENT POLICIES.
K5	WE HAVE RECEIVED YOUR CLAIM FOR AN INVALID SERVICE CODE BASED ON OUR REIMBURSEMENT POLICY. PLEASE CORRECT THE INFORMATION AND RE-SUBMIT.
К6	WE HAVE RECEIVED YOUR CLAIM FOR AN INVALID SERVICE CODE BASED ON OUR REIMBURSEMENT POLICY. PLEASE CORRECT THE
КН	INFORMATION AND RE-SUBMIT. THIS PRE-OPERATIVE SERVICE/MEDICAL VISIT IS INCLUDED IN AND CONSIDERED PART OF THE ASSOCIATED SURGICAL PROCEDURE
KJ	SUBMITTED ON THIS CLAIM. THIS POST-OPERATIVE SERVICE/MEDICAL VISIT IS INCLUDED IN AND CONSIDERED PART OF THE ASSOCIATED SURGICAL PROCEDURE
	SUBMITTED ON A SEPARATE CLAIM.
KK	THE MEDICAL VISIT IS INCLUDED IN AND CONSIDERED PART OF THE SURGICAL PROCEDURE PERFORMED ON THE SAME DATE OF SERVICE SUBMITTED PREVIOUSLY.
	SOBINITIED PREVIOUSET.

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.
MO	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
P[HEALTH CARE PROFESSIONAL: YOU SUBMITTED THIS CLAIM TO THE INCORRECT ADDRESS. WE HAVE FORWARDED IT TO AMERICAN SPECIALTY
	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
JIVI	INITIAL CLAIM REVIEW.
SN	WE REQUESTED INFORMATION WITH NO RESPONSE. WE MUST CLOSE OUR FILE. IF INFORMATION IS SUBMITTED, WE WILL RECONSIDER THE
SIN	INITIAL CLAIM REVIEW.
SS	EXPENSES INCURRED AFTER THE DATE COVERAGE TERMINATES ARE INELIGIBLE.
ST	
ST	EXPENSES INCURRED AFTER THE DATE COVERAGE TERMINATES ARE INELIGIBLE.
	COVERED UNDER GLOBAL FEE
SW TF0	CLAIM NOT SUBMITTED ON TIME. YOUR CONTRACT PROHIBIITS BILLING THE PATIENT. SEND PROOF OF TIMELY FILING TO ADDRESS ON ID CLAIM NOT SUBMITTED ON TIME. IN-NETWORK HEALTH CARE PROFESSIONALS CAN'T BILL THE PATIENT. SEND PROOF OF TIMELY FILING TO
110	
TF1	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.
11110	SERVICES WERE DISALLOWED BY UTILIZATION MANAGEMENT
UM0 UM1	
V01	UNITS EXCEED A UTILIZATION MANAGEMENT AUTHORIZATION
V01	DOCTOR: YOU DID NOT OBTAIN PRECERTIFICATION FOR THIS PROCEDURE THROUGH THE CIGNA RADIATION THERAPY PROGRAM. CALL
1/02	866.668.9250 WITH QUESTIONS
V02	DOCTOR: NO MORE QUANTITIES ARE AVAILABLE FOR THIS PROCEDURE CODE THROUGH CIGNA'S RADIATION THERAPY PRGM. CALL
V0C	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 WITH
	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
	PREVIOUSLY SUBMITTED.
VCI	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.
VGE	THE CLAIM HAS A GENDER/PROCEDURE CODE MISMATCH. IF THE GENDER AND PROCEDURE CODE ARE CORRECT, LET US KNOW AND WE LL
VOL.	REPROCESS THE CLAIM.
VL4	SERVICE NOT COVERED DOES NOT MEET YOUR PLAN'S DEFINITION FOR MEDICALLYNECESSARY CARE OR TREATMENT.
VL4 VNB	SERVICE NOT COVERED DOES NOT MEET YOUR PLAN'S DEFINITION FOR MEDICALLYNECESSARY CARE OR TREATMENT. OUR RECORDS DO NOT INDICATE YOUR NEWBORN CHILD IS ENROLLED FOR COVERAGE. PLEASE CONTACT YOUR EMPLOYER IF THIS
	OUR RECORDS DO NOT INDICATE YOUR NEWBORN CHILD IS ENROLLED FOR COVERAGE. PLEASE CONTACT YOUR EMPLOYER IF THIS

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 SERVICE IS DEFINED. WE RECEIVED FOOR CERTIFIC WITH AN INVAFINED BY WITHOUT THIS CLAIM. 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 XAB	MEMBER NOT ELIGIBLE FOR COVERAGE. 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
XJH	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 XS9	THIS SERVICE IS NOT COVERED WHEN RENDERED BY A NON-NETWORK PROVIDER AS SHOWN IN YOUR PLAN'S BENEFITS SCHEDULE 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 XU0	THIS SERVICE IS NOT COVERED AS BILLED. PLEASE RESUBMIT WITH A VALID CPT4 CODE. PRE-TREATMENT AUTHORIZATION REQUIRED BY THE PLAN WAS OBTAINED BUT NOTFOLLOWED. MEMBER NOT LIABLE FOR NOT COVERED
XU1	AMOUNT. SERVICE NOT COVERED WAS NOT PRE-AUTHORIZED AS REQUIRED BY THE PLAN OR AUTHORIZATION WAS DENIED. MEMBER NOT LIABLE IF
XU4	CONTRACTED PROVIDER. 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 XUF	THE SERVICE NOT COVERED DOES NOT MEET YOUR PLAN'S DEFINITION FOR MEDICALLY NECESSARY CARE OR TREATMENT. 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.