Clinical Policy Web Posting
Reference Number: CP.CPC.02
Effective Date: 12/16
Last Review Date: 12/17

Description
This policy details corporate and health plan responsibilities for initial posting and maintenance of clinical, payment, and specialty drug policies (herein referred to as “clinical policies”) on the public health plan websites.

Work Process
I. Initial set up
A. Corporate responsibilities for initial set up of clinical policy folders include:
   1. Communicating with Compliance360 (C360) staff to have the appropriate folders built and access granted to the appropriate parties.
   2. Communicating with corporate and health plan marketing departments to ensure proper set up of web pages.
   3. Communicating with plan level designee regarding status of project.
B. Health plan responsibilities for initial set up of clinical policy folders includes:
   1. Identifying a designee who will be the main point of contact and perform all work related to posting and maintaining clinical policies.
   2. Determining which policies are appropriate to post.
   3. Communicating with the health plan marketing or compliance department to determine applicable state regulations, such as web page or specific policy approval requirements.
   4. Identifying plan-level approvers (if needed).
   5. Linking appropriate policies from corporate and health plan folders in C360 to the specified web posting folder (refer to CC.COMP.22.01 Creating and Maintaining P&Ps).
   6. Notifying providers that clinical policies are available and providing training on how to find them, as needed.

II. Ongoing maintenance
A. Maintenance of clinical policies
   1. The corporate clinical policy team and Clinical Policy Committee will review and approve all corporate clinical policies on an annual basis and upon significant change in evidence-based guidelines. The corporate clinical policy team will post the updated policies in the clinical policy folder.
   2. Email updates will be sent to the health plan designees on the following basis:
      a. Notification when a policy is being retired, including a list of any policies that will replace the retired policy.
      b. Monthly updates including policy revisions and new policies.
      c. A quarterly summary of all policies created or revised in the past quarter.
   3. The health plan Medical Director and local Utilization Management Committee will review and approve all health plan-specific clinical policies on an annual basis and upon significant change in evidence-based guidelines. The applicable corporate clinical policy should be reviewed as a basis for conducting policy reviews. The
health plan is responsible for notifying the clinical policy designee in a timely manner of any changes, new policies, and retired policies.

4. Based on policy updates, the health plan designee will make updates to the clinical policy web posting folder as necessary.

B. Quarterly review of posted clinical policies
1. The health plan designee should review the clinical policy web posting folder on at least a quarterly basis to ensure:
   a. All policies are current
   b. All policies are still appropriate to be posted on the public web site
   c. Any appropriate new policies are added
   d. Any retired policies are made non-searchable

C. Ensuring compliance
1. The corporate clinical policy team will ensure corporate clinical policies follow evidence-based guidelines and compliance with NCQA (National Committee for Quality Assurance) regulations.
2. The health plan will ensure compliance with local regulations related to clinical policies, posting of policies on the public website, and communicating with providers; as well as ensuring health plan-specific policies follow evidence-based guidelines and meet NCQA regulations.

D. Notifying providers
1. It is the responsibility of the health plan to communicate with providers when clinical policies are made available on the public website.
2. The health plan will provide ongoing support and communication to providers regarding clinical policies changes via the public website.

Reviews, Revisions, and Approvals

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<thead>
<tr>
<th>Change Description</th>
<th>Date</th>
<th>Approval Date</th>
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<tbody>
<tr>
<td>Policy developed</td>
<td>11/16</td>
<td>12/16</td>
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<tr>
<td>I.A.1 updated to include granting access to appropriate parties.</td>
<td>11/17</td>
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<td>I.A.2 updated to include health plan marketing department.</td>
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<tr>
<td>All policy references updated.</td>
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References
1. CC.COMP.22 Policy and Procedure Documentation
2. CC.COMP.22.01 Creating and Maintaining P&Ps
3. CC.MRKT.02 Health Plan Websites