

Document Type:¹ ☒ Policy & Procedure ☐ Process Guideline
☐ Plan ☐ System Description

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Document Scope: (applies to Policy & Procedure only)

- The requirements herein apply only to the GCBH BH-ASO Central Office and its functions.
- ☒ The requirements herein apply, verbatim, to GCBH BH-ASO and its network providers².
- The requirements herein apply both to GCBH BH-ASO and its network providers². Additionally, network providers must have internal documents outlining their processes for implementing the requirements, insofar as they relate to actions for which network providers are responsible.

PURPOSE: To assure that Greater Columbia Behavioral Health, LLC BH-ASO (GCBH BH-ASO) pursue third party resources, and uses those resources to support the public Behavioral Health system and ensure that Medicaid, State, and federal funding is the payer of last resort; that Individual benefits are appropriately funded; and to utilize the contract monitoring process to ensure that Network Providers are adhering to the policy.

DEFINITIONS

- I. Third Party Resources: Those resources other than Medicaid, State or Federal Block Grants that can be used to pay for services prior to the billing of Medicaid, State or Federal Block Grant.
- II. Coordination of Benefits: Those activities undertaken by GCBH BH-ASO and Network Providers to insure that appropriate Individual benefits, as identified in the Individual service plan, are properly funded using all available resources.

POLICY

- A. Individual's benefits are funded through all available third party resources with Medicaid, and state and federal funding being billed as a last resort.
- B. All funds recovered from third-party resources are treated as income and are used to support the public Behavioral Health system.
- C. GCBH BH-ASO and Network Providers remedy issues concerning service discrimination, if such issues surface.

PROCEDURE

1. GCBH BH-ASO Provider Network subcontracts include the requirement to identify, pursue, and record third-party resources. This required subcontractor process is subject to Certification.

2. GCBH BH-ASO Provider Network subcontracts include the requirement to document and review the Individual service plan to coordinate the payment of Individual benefits.
3. When an Individual has alternative payer sources, and Explanation of Benefits (EOBs) may serve this function, they should reflect the denial of payment from other Third Party Payers.
4. GCBH BH-ASO Provider Network subcontracts include the requirement to treat third-party resources as income to be used solely to support the public Behavioral Health system.
5. GCBH BH-ASO provider network subcontractors shall pursue third party resources. GCBH BH-ASO subcontractors shall bill applicable insurance companies prior to billing GCBH BH-ASO and provide documentation upon request.
6. GCBH BH-ASO Network Provider subcontracts will include the requirement to attend GCBH BH-ASO sponsored trainings.
7. Random sampling of third party potential will be requested during contract monitoring for a funding review to determine if Individuals' benefits were funded appropriately and to determine if those funds were accounted for properly.
8. If through the financial review, periodic chart review, or other areas observed during the annual contract monitoring, any issues are identified concerning appropriate funding of Individual benefits, the contractor must address such issues immediately and a Correction Action Plan will be provided to GCBH BH-ASO within 30 calendar days that details how the issues were resolved. GCBH BH-ASO will follow-up periodically, to ensure that the Correction Action Plan was fully implemented.

APPROVAL



Karen Richardson or Sindi Saunders, Co-Directors

9/16/2025

Date