

# PUBLIC SUBMISSION

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Affordable Care Act; Federal External Review Process Request for Information

**Comment On:** HHS-OS-2010-0025-0001

Affordable Care Act; Federal External Review Process

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## Submitter Information

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**Organization:** Prest and Associates, Inc.

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## General Comment

1. URAC
2. URAC accredited IROs follow URAC credentialing standards for medical review. We are unaware of credentialing standards for legal reviewers at Prest. Credentialing is required for URAC accredited IROs and many state certifications.
3. As a URAC accredited IRO, we follow URAC Conflict of Interest standards
4. Prest does primarily psychiatric and substance abuse reviews. Our systems are designed to expand and scale quickly to accommodate all types of reviews and volumes. Our experience is that time in staffing does not vary based on type of claim.
5. Prest uses a company designed database for data collection, tracking, analysis and report generation.
6. Yes
7. Prest uses secure website, 24 hour access and translation services for many non-English speaking consumers.
8. The time to become fully operational would depend in specifics of contract. Prest is fully developed and operational.
9. Transition would be minimal if IRO is currently functioning under current Federal

interim external review process unless there are significant changes in the final rule including technology.

10. Prest & Associates operates nationally as do most IROs. Some IROs operate regionally.

11. Yes, HHS should consider specialized contracts with IROs such as Prest as our focus is in psychiatry and addiction medicine. Specialized contracts would not have an impact on care coordination.

12. There would be minimal difference in standard operating procedure.

13. Prest uses approx. 60 data collection points for tracking all reviews.

14. IROs sign Business Associate Agreements with all clients. We have confidentiality agreements signed with our physician advisors. All data is transmitted in HIPAA compliant form.

15. Yes as required by URAC. Yes, Prest evaluates for consumer access through URAC standards and we do quality improvement initiatives.

16. IROs need to assess the quality of the physician opinions and timeliness. Performance goals can be based on regular interrater reliability studies.