



COURSE OF TREATMENT POLICY AND PROCEDURE

Policy and Procedure Information

Scope	Medicare Advantage Plan-ISNP, DSNP & IESNP	Effective Date	1/1/2024
Department	Clinical-Utilization Management	Revision Date	
Owner	Koby Mitchell, RN	Version	1.0
Executive Sponsor	Dr. Clare Hays, MD	Status	Active
Exceptions to Scope	N/A		

Purpose of Policy and Procedure

To ensure compliance with CMS regulations concerning prior authorization (PA) and course of treatment requirements in Medicare Advantage (MA). This policy defines "course of treatment," establishes how medical necessity is reviewed for such requests, and outlines Simpra's approach to partial approvals and limitations.

Guidelines

- **42 CFR §422.101** – Requirements relating to benefits.
- **42 CFR §422.568–572** – Organization determinations and reconsiderations.
- **CMS-4201-F, Contract Year 2024 Policy and Technical Changes to MA and Part D Final Rule** (88 FR 22120, April 12, 2023).
- **CMS FAQ: Coverage Criteria Requirements for MA Organizations** (June 2023).
- **CMS Medicare Managed Care Manual, Chapter 4, §10.16** – Prior Authorization requirements.
- **CMS Model Notices** (Integrated Denial Notice, NOMNC, DENC, effective January 2025 updates).

Policy Statement

- Simpra must comply with CMS requirements that once a **course of treatment** is approved, the authorization remains valid **as long as medically reasonable and necessary**, without imposing additional or repeated PA requests.
- Simpra may approve a course of treatment in full or in part, based on documented medical necessity and clinical evidence.
- Simpra will not impose new PA requirements or shorten an approved course of treatment unless clear evidence arises of fraud, abuse, or significant error in the original approval.

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Procedure

A. Review of Medical Necessity for a Course of Treatment

UM staff and Medical Directors must:

1. **Confirm diagnosis and presence of illness/condition** through medical records, provider documentation, and supporting clinical information.
2. **Review Medicare criteria in the following order:**
 - o Federal statute and regulations.
 - o National Coverage Determinations (NCDs).
 - o Local Coverage Determinations (LCDs).
 - o Simpra's publicly posted, evidence-based criteria when Medicare criteria are not fully established.
3. **Ensure criteria alignment** with the member's medical condition, treatment plan, and applicable clinical guidelines.
4. **Document rationale** for determination in the UM system, including criteria applied and supporting clinical findings.

B. Approving a Course of Treatment

- Approve the full requested course of treatment when clinical evidence supports medical necessity for the full scope.
- Authorization remains valid for the full approved period unless services are no longer medically reasonable and necessary.
- Simpra will not require additional PAs for ongoing treatment within the approved course.

C. Partial Approvals

When only part of a requested course of treatment meets medical necessity:

1. **Approve the portion that is medically reasonable and necessary.**
 - o Example: SNF A request for 30 days for a member requiring 14 days antibiotic therapy post-acute care. Approve 14 days of SNF Part A for IV antibiotic administration when documentation supports this timeframe but deny the remaining requested 16 days for lack of skilled need if no further documented skilled, or reasonable expectation of a skilled need exists.
2. **Issue a denial for the portion not approved**, with a clear, specific denial rationale linked to Medicare rules or posted plan criteria.

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3. Provide the CMS-required Integrated Denial Notice (IDN) to the member and provider, in compliance with CMS model notice requirements.

D. Prohibition Against Imposing Additional PAs

- Once a course of treatment is approved, Simpra will not impose new PA requirements or require resubmission for additional approvals within the approved timeframe.
- The only exceptions include:
 - Discovery of fraud or abuse.
 - Discovery of significant error in the original approval.
 - Emergence of new clinical information that renders the approved treatment no longer medically necessary.

Definitions

Item	Definition
Course of Treatment	<p>As defined by CMS (CMS-4201-F, CY2024 MA Final Rule), a course of treatment refers to a prescribed set of services furnished to treat a specific illness, condition, or ongoing episode of care. Examples include:</p> <ul style="list-style-type: none"> • A regimen of chemotherapy for cancer treatment. • A prescribed supply period for durable medical equipment (DME). • A post-acute SNF stay following hospitalization when medically necessary.
Partial Approval	<p>An authorization where part of the requested service (duration, frequency, or quantity) is approved based on medical necessity, while the remaining portion is denied as not reasonable and necessary.</p>

Document Approval

Date	Approver	Role	Approved
9/22/2025	Dr. Clare Hays, MD, CMD	Chief Medical Officer	Yes
10/20/2025	UMAC	UM activity oversight	Yes



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12/15/2025	UM Committee- annual review	UM activity oversight	Yes
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Review & Revision History

Date	Revision Summary	Author	Approval Required?
9/19/2025	DRAFT	Koby Mitchell	Yes