**Checklist: Commercial Utilization Review**

Increased scrutiny from government payers has led many hospitals and health systems to spend more time and resources on utilization review of Medicare patient cases but they spend comparatively little time on utilization review of patient cases submitted to commercial health plans.

Consider the following as you assess your organizational best practices for implementing commercial utilization review.

Initiate a commercial utilization review process.

* Do not review all inpatient commercial cases.
* Use a medical necessity screening tool to flag cases that do not meet criteria for inpatient status.
* Use a second-level physician review process to identify those flagged cases most likely to be audited, downgraded, or denied.
* Compare data elements in the medical chart (i.e., lab results, procedure results, physician notes) with clinical documentation to identify gaps between services provided and services documented.
* Review documentation in flagged cases with attending physicians, as necessary.
* Send physician-generated documentation supporting inpatient status along with claims that have been flagged for review to payers.
* Use a peer-to-peer review process with commercial health plans to address cases that have been downgraded or denied.

Improve the peer-to-peer review process.

* Review purpose of utilization review function with physicians.
* Educate physicians on criteria for inpatient and observation status and supporting documentation requirements.
* Coach physicians on effective review techniques (i.e., focusing on the reasons for inpatient status, maintaining a professional demeanor during discussions with health plans).

Improve clinical documentation.

* Provide formal instruction to physicians on clinical documentation improvement.
* Instruct nurses on how to help guide physicians on appropriate documentation.
* Provide resources (i.e., a utilization review committee, physician advisor) for physicians to address questions and concerns about their gaps in documentation expertise.

*Source:* “Expanding UR Best Practices to Commercial Health Plans,” Ralph Wuebker, MD, MBA, chief medical officer, Executive Health Resources and Rachael Stehling, RN, executive director of care management, Covenant Health System, presentation, HFMA National Institute, ANI, June 2015, and HFMA interview.