

MEMORANDUM

To: All members and practitioners, providers and employees of IHHMG who make UM

decisions.

From: Imperial Health Holdings Medical Group Utilization Management Department

Date: December 8, 2016

IHHMG affirms that

- 1) UM decision making is based only on appropriateness of care and service and existence of coverage.
- 2) IHHMG does not specifically reward practitioners or other individuals for issuing denials of coverage.
- 3) Financial incentives for UM decision makers do not encourage decisions that results in underutilization.
- 4) Practitioners are ensured independence and impartiality in making referral decisions that will not influence:
- Hiring
- Compensation
- -Termination
- -Promotion
- -Any other similar matters

Source: [29 CFR 2590.715-2719(b)(2)(ii)(D)]