



Historically the Colorado Division of Insurance has only acted upon complaints received from consumers. This has been a long-standing frustration for physicians and their staff. In March 2017, the Insurance Commissioner agreed to undertake a pilot project with the Colorado Medical Society (CMS) to gather and analyze provider complaints on specific issues concerning delays in claims processing and inappropriate denials.

CMS built an on-line payer complaint tool and ran the first pilot test this year. CMS took a very systematic approach to developing and implementing the pilot program with the intent of insuring the integrity of the data reported. Working with the Division of Insurance (DOI) and practice managers representing various physician specialties, CMS developed the online tool for the reporting of complaint data. De-identified information is collected and aggregated across all submissions by complaint type. The aggregated complaint data is analyzed by CMS and a report is shared with the DOI on at least a semi-annual basis.

The initial pilot demonstrated the value of the DOI receiving actionable data about insurance companies repeated denials, delays or incorrect processing of claims. The intent of the pilot and submission of complaints was not to resolve individual claim problems. Rather, the data gathered via the online complaint tool provides information that can be used by the DOI to inform its regulatory oversight of insurance plans and it can be used by CMS for other advocacy purposes.

In Colorado, like many other states, the majority of individuals receive coverage through their employers and many of those employers have self-funded benefit plans. The Division of Insurance does not have jurisdiction over these health benefit plans. However, the DOI recognizes that payer issues cross all lines of business and for this reason the data collection was not limited to just those fully insured health benefit plans they do have jurisdiction over.

Over the next few months CMS will initiate a second, expanded pilot with two billing services. The intent of this pilot is to further streamline the process prior to making it available to all CMS members. When it is rolled out to membership, the online complaint tool will include explanations of terminology and direct links to the supporting statute or regulation from the CMS [Know Your Legal Rights](#) database.