



Health Insurance Bulletin

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Prompt Processing Regulation

We have received questions regarding the applicability of the prompt processing statutes, R.I. Gen. Laws §§ 27-18-61, 27-19-52, 27-20-47 and 27-41-64, and the prompt processing regulation, OHIC Regulation 7, to pharmacy claims. Based on the plain language of the prompt processing statutes, we have determined that pharmacy claims are not covered by the prompt processing statutes and regulations. However, where a claim involves both the provision of a service (e.g., an office visit) and the administration of a drug (e.g., an injectable administered during the office visit), the claim is considered a “service” and is covered by the prompt processing statute and regulation.

The Prompt Processing statute and regulation apply to any “health care entity or health plan operating in the state” and cover “all complete claims for covered health care services submitted to the health care entity or health plan by a health care provider or by a policyholder”. R.I. Gen. Laws §§ 27-18-61(a), 27-19-52(a), 27-20-47(a) and 27-41-64(a).

“Health care services include, but are not limited to, medical, mental health, substance abuse, dental and any other services covered under the terms of the specific health plan”. R.I. Gen. Laws §§ 27-18-61(f)(5), 27-19-52(f)(5), 27-20-47(f)(5) and 27-41-64(f)(5).

The use of the word “services” in the definition of “health care services” suggests that the scope of the prompt processing requirements are limited to claims related to the provision of health care “services,” and not to claims related to health care products, devices or pharmaceuticals. In other words, only claims related to the performance of professional duties or activities on behalf of a patient are covered by the statute and regulation.

This means that stand-alone pharmacy claims (e.g., a claim for a prescription filled by a pharmacy) are not covered by the prompt processing statute and regulation. Stand-alone pharmacy claims should not be included in the reports required by Section 7 of the prompt processing regulation. Claims involving a combination of the provision of services and administration of drugs (e.g., providing an injectable during an office visit) are jointly considered a “service” and are covered by the prompt processing statute and regulation.

Christopher F. Koller
Health Insurance Commissioner
October 24, 2006