



Troy Medicare Policy and Procedure

Title: Troy.AI Action Development, Review and Deployment Policy and Procedure			Policy Number: CMP-031
Primary Departments: Pharmacy and Engineering	LOB: Medicare Advantage/PDP		Author: E Lipkind
Effective Date: 8/1/2024	Original Date: 8/21/2024	Review Date(s):	Archive Date:
Interactive Related Department(s)			
☐ All Departments ☐ Compliance ☐ Finance ☐ Provider Operations ☐ Sales and Marketing	☐ Appeals and Grievances ☐ Pharmacy ☐ Member Services ☐ Quality Management ☐ Utilization Management	☐ Care Management ☐ Enrollment ☐ Plan Administration ☐ Claims ☐ IT/Engineering	

POLICY PURPOSE

Troy Medicare and Troy.AI are committed to ensuring that Troy.AI Care Actions are developed and implemented in accordance with applicable regulations and Medicare Advantage/Prescription Drug Plan program requirements.

The purpose of this policy is to provide requirements for developing appropriate and compliant Troy.AI Actions for pharmacy interaction with Medicare beneficiaries and Troy Medicare members, and/or clinical caregiver interactions with Troy Medicare members.

Troy Medicare is committed to complying with federal and state rules and regulations.

SCOPE

This policy applies to all departments that are involved in the ideation, development, implementation, execution, oversight and review of Troy.AI actions.

REFERENCES

- 42 CFR § 422.100
- 42 CFR § 423.2266(c)
- Medicare Managed Care Manual Chapter 5 - Quality Assessment

RESPONSIBLE PARTY

- Chief Compliance Officer

DEFINITIONS

- **Troy.AI** - is a software application that facilitates care coordination, quality initiatives, and pharmacy interactions between a pharmacist, care coordinator, and patient.
- **Troy.AI Care Action (“Action”)** - is an assigned action within the Troy.AI software application that is available for completion by a clinical caregiver or pharmacist. Examples include, but are not limited to: supporting patients’ medication adherence, comprehensive medication reviews, closing HEDIS gaps, and generally helping patients with quality outcomes and cost savings.
- **Troy.AI Internal** - The Troy Medicare-facing side of the Troy.AI software application. This is where Actions are assigned and reviewed for completion and accuracy once submitted by a Troy.AI pharmacy or internal clinical caregiver. This is also where all data is stored for retention and reporting.
- **Troy.AI Product** - The clinical caregiver/pharmacy-facing side of the Troy.AI software application. This is where Actions are completed, documented, and submitted for review.
- **Assignment** - The method of assigning actions to eligible members for completion by pharmacies or clinical caregivers in the Troy.AI software application.

POLICY

This policy is intended to provide guidelines and clarity for the development and implementation of Troy.AI Actions by Troy employees and contractors.

All employees and contractors engaged in the ideation, development, implementation, execution, oversight and review of Troy.AI Actions should understand the compliance requirements for the actions to be performed. All Troy.AI Actions and associated action descriptions must receive a compliance review prior to the assignment or implementation in order to ensure:

1. proper application and compliance with federal and/or state regulation, and
2. proper beneficiary/member protections are in place.

PROCEDURE

1. Action ideation is brought forth and discussed with the Pharmacy, Engineering, Medical Management and the Quality team leaders.
2. The Engineering team will review the components of the suggested action and confirm that Troy.AI can accommodate the requested action. Once confirmed that the Action is sustainable, the clinical pharmacist or Engineering team member will create all required elements following compliance and clinical and quality guidance:
3. Actions will be reviewed by the originating party and/or the Pharmacy, Engineering, Medical Management and/or the Quality team leaders to ensure all components are captured as intended to achieve the goal or outcome of the new Action.

4. Once approved by all applicable teams, the final draft Action will be sent to Compliance for review and approval prior to testing and assignment. **No Action shall be assigned to members for execution by a pharmacy or clinical caregiver until and unless approval has been provided by the Compliance team.**
5. Upon approval from Compliance, testing is performed on both internal and product sides of the Troy.AI software application to eliminate any application errors prior to release.
6. Upon successful completion of testing, a member assignment list will be created by Engineering and the Action will be assigned.
 - a. If there are any changes in the Action prior to assignment, the Action will be sent back for review by Compliance before retesting and ultimate assignment occurs of the Action to the members.
7. A final review of assignment will take place after the ultimate assignment to ensure no duplicates or errors occurred during the assignment process.

ATTACHMENTS/RELATED POLICIES/STANDARD OPERATING PROCEDURES/FORMS

- n/a

APPROVALS



Chief Executive Officer
08 / 22 / 2024

Date



Policy Committee
08 / 22 / 2024

Date

Revision History

Revision Date	Revised by Whom	Revisions Made
8.21.2024	E Lipkind	Initial Policy