

Managed Care Policies Procedures Public Comments

Date Submitted	Item Number and Policy	My question/comment
1/13/2022 13:52	2021-ACLA-1177 Potential Upcoding of Surgical Services	<p>On behalf of the Louisiana Rural Mental Health Alliance, I would urge the department to reject this proposed policy seeking to implement prepayment review. While our members do not provide any of the services outlined in the proposed policy, we are nonetheless deeply concerned that approval of this policy will lead to the rapid expansion of prepayment review being used in a manner that simply creates unnecessary administrative burden for providers as they seek payment for claims rather than serving as a tool to protect program integrity. We strongly believe that prepayment review should only be implemented directly by the department and in strict conformance with the provisions of the Medical Assistance Programs Integrity Law.</p>
3/3/2021 11:10	2020-LHCC-680- Provider Reimbursement	<p>The policy is proposing to remove 5.7a "The PLAN shall reimburse providers for emergency services rendered without a requirement for service authorization of any kind," and replace it with " The plan shall not deny payment for treatment when a representative of the PLAN instructs the member to seek emergency services."</p> <p>My question- Is the Provider considered to be a representative of the PLAN?</p> <p>If your Plan requires the patient to contact LHC prior to arriving to the ER why would the ER Provider be held financially reliable for treating the patient. By law, the Provider can not turn a patient away who seeks medical attention in the ER setting. This change will also create a ethical issue because you are not to medically treat based on payment source.</p>

Managed Care Policies Procedures Public Comments

<p>8/3/2020 15:36</p>	<p>2020-HBL-250 Provider Manual</p>	<p>On behalf of the Louisiana Hospital Association (LHA), the trade association for more than 150 hospitals and health systems in the state, we would like to express concern over a proposed section of new policy included in the proposed revision of the Healthy Blue Provider Manual, Item Number 2020-HBL-250.</p> <p>Specifically, on page 97 of the PDF document, under the heading "Outpatient/Ambulatory Surgery," the document shows new language being added as follows:</p> <p>"Emergency and Observation services rendered within one (1) day of a Same Day Surgery, and all pre-admission (workup) services shall be included in the Same Day Surgery rate."</p> <p>This new language is concerning as it appears to be more expansive than the existing requirements set forth in the Hospital Services Provider Manual. Pertinent language from the Medicaid Hospital Provider manual which can be found in Chapter 25, Section 25.3 under the heading "Outpatient Surgery" provides:</p> <p>"...All other charges associated with the surgery (for example, observation, labs, radiology) must be billed on the same claim form as the Ambulatory surgery charges..."</p> <p>In contrast, the proposed Healthy Blue policy purports to limit reimbursement for any "emergency" or "observation" services simply because they were rendered within one (1) day of the outpatient surgery and seemingly without regard as to whether those services had any association with the surgery. We would urge LDH to seek greater clarification of the proposed policy in order to determine whether it conflicts with existing Medicaid policy.</p>
---------------------------	---	--

Managed Care Policies Procedures Public Comments

<p>2/28/2020 20:51</p>	<p>2020-ABA-1 ABA Required Documenation per Codes</p>	<p>I've reviewed the documentation guidelines outlined. I appreciate having a standard outlined clearly. However I have some concerns:</p> <ol style="list-style-type: none"> 1. The dating references Jan 1 2019. It's inappropriate to backdate guidelines/standards now. It should be dated forward for once guidelines are outlined and shared with all providers. 2. Data sheets should be a part of the accepted documentation. They need to be accompanied by notes but not excluded. Data sheets have the most information about what occurred and are the primary source for a session. 3. Some of the language in what should be included in the daily note is concerning. For an RLT to document each intervention used that day. Multiple are used a day and simultaneously. <p>Thank you</p>
<p>2/28/2020 20:49</p>	<p>2020-ABA-4 Applied Behavior Analysis Fee Schedule Coding Update</p>	<p>The rates for the fee schedule are not adequate. Medicaid has decreased the rate over the years, making it harder to get more providers, as well as to get and retain quality providers, and whereas it didn't decrease this year, it also is still below what is necessary for providing quality services. On top of decreasing rates, medicaid continues to increase the demands. Increasing demands and stress without compensation of the increased workload leads to burnout and reduction in services.</p> <p>Also, BCBA's should be paid a higher rate for providing therapy to clients than someone with no ABA experience/degree at a bachelors level. Same for BCaBA's; please bring back rate options for higher level therapy services.</p> <p>Also, the three original codes were a lot more self-explanatory and easier, so less room for error. Please consider going back to a smaller, easier list, as well as an increased rate.</p> <p>Please also consider allowing group parent training with client codes. This is a HUGE way to help with generalization</p>

Managed Care Policies Procedures Public Comments

		<p>of skills, as well as aid in transition of services. Group rates are also too low.</p> <p>I love that there are now group options for services, and that you now reimburse for multiple therapists. Please consider doing the rate for per therapist with a cap, as sometimes the severely aggressive clients take three therapists and a supervisor, and older aggressive clients may take even more, especially in community based services, to ensure safety. Thank you for recognizing this need and making this available for our clients, as providing services to clients with more destructive behaviors requires more resources and isn't sustainable without the added compensation for those resources.</p> <p>We appreciate you giving us the opportunity to provide feedback, and your consideration in all of this.</p>
<p>11/22/2019 16:29</p>	<p>2019-Healthy Blue-95 MHR PSR Provider Bulletin</p>	<p>The Louisiana Hospital Association appreciates the opportunity to comment on proposed MCO policies/procedures as provided by Act 319 of the 2019 Session. We have reviewed the above referenced policy and do not believe this submission by Healthy Blue is compliant with the provisions of Act 319. The proposed Healthy Blue policy implies a change, but does not appear to completely meet the following requirements as specified in the Act:</p> <p>(1) Include both the existing policy or procedure and the proposed policy or procedure, with the proposed language in the text printed in boldface type and underscored;</p> <p>(2) All present policy or procedure language and punctuation which are to be deleted shall be struck through.</p>

Managed Care Policies Procedures Public Comments

<p>11/22/2019 16:27</p>	<p>2019-LHCC-25 UM Communication Services</p>	<p>The Louisiana Hospital Association appreciates the opportunity to comment on proposed MCO policies/procedures as provided by Act 319 of the 2019 Session. We have reviewed the above referenced policy and do not believe this submission by LHCC is compliant with the provisions of Act 319. The proposed LHCC policy implies a change, but does not appear to completely meet the following requirements as specified in the Act:</p> <p>(1) Include both the existing policy or procedure and the proposed policy or procedure, with the proposed language in the text printed in boldface type and underscored;</p> <p>(2) All present policy or procedure language and punctuation which are to be deleted shall be struck through.</p> <p>While there is language represented on page 5 of 6 that is bolded and underscored and has the appearance of a proposed change, we do not believe this is the proper representation of the change as it is not represented in its proper place and context of the submitted document.</p>
<p>11/22/2019 16:25</p>	<p>2019-Healthy Blue-49 PA Req N Supervision for Hyperbaric O2</p>	<p>The Louisiana Hospital Association appreciates the opportunity to comment on proposed MCO policies/procedures as provided by Act 319 of the 2019 Session. We have reviewed the above referenced policy and do not believe this submission by Healthy Blue is compliant with the provisions of Act 319. The proposed Healthy Blue policy implies a change in the policy, but does not appear to meet the following format requirements as specified in the Act:</p> <p>(1) Include both the existing policy or procedure and the proposed policy or procedure, with the proposed language in the text printed in boldface type and underscored;</p> <p>(2) All present policy or procedure language and punctuation which are to be deleted shall be struck through.</p>

Managed Care Policies Procedures Public Comments

<p>11/22/2019 16:24</p>	<p>2019-Healthy Blue-80 SBIRT Flier Update</p>	<p>The Louisiana Hospital Association appreciates the opportunity to comment on proposed MCO policies/procedures as provided by Act 319 of the 2019 Session. We have reviewed the above referenced policy and do not believe this submission by Healthy Blue is compliant with the provisions of Act 319. The proposed Healthy Blue policy implies a change in the policy, but does not appear to meet the following format requirements as specified in the Act:</p> <p>(1) Include both the existing policy or procedure and the proposed policy or procedure, with the proposed language in the text printed in boldface type and underscored;</p> <p>(2) All present policy or procedure language and punctuation which are to be deleted shall be struck through.</p>
<p>11/22/2019 16:21</p>	<p>2019-Healthy Blue-96 ICD-10 Coding Tips Sheet Flier</p>	<p>The Louisiana Hospital Association appreciates the opportunity to comment on proposed MCO policies/procedures as provided by Act 319 of the 2019 Session. We have reviewed the above referenced policy and do not believe this submission by Healthy Blue is compliant with the provisions of Act 319. The proposed Healthy Blue policy implies a change in the policy, but does not appear to meet the following format requirements as specified in the Act:</p> <p>(1) Include both the existing policy or procedure and the proposed policy or procedure, with the proposed language in the text printed in boldface type and underscored;</p> <p>(2) All present policy or procedure language and punctuation which are to be deleted shall be struck through.</p> <p>Additionally, we are uncertain about the intent of this "tip sheet" and its intended use. We believe that policies and procedures should be clearly denoted.</p>

Managed Care Policies Procedures Public Comments

<p>11/22/2019 16:17</p>	<p>2019-Healthy Blue-94 SUD Criteria for Prior Authorization</p>	<p>The Louisiana Hospital Association appreciates the opportunity to comment on proposed MCO policies/procedures as provided by Act 319 of the 2019 Session. We have reviewed the above referenced policy and do not believe this submission by Healthy Blue is compliant with the provisions of Act 319. The proposed Healthy Blue policy implies a change in the policy, but does not appear to meet the following format requirements as specified in the Act:</p> <p>(1) Include both the existing policy or procedure and the proposed policy or procedure, with the proposed language in the text printed in boldface type and underscored;</p> <p>(2) All present policy or procedure language and punctuation which are to be deleted shall be struck through.</p>
<p>11/22/2019 16:16</p>	<p>2019-Healthy Blue-38 WAVE CG DME 46 Pneumatic</p>	<p>The Louisiana Hospital Association appreciates the opportunity to comment on proposed MCO policies/procedures as provided by Act 319 of the 2019 Session. We have reviewed the above referenced policy and do not believe this submission by Healthy Blue is compliant with the provisions of Act 319. The proposed Healthy Blue policy implies a change in the policy, but does not appear to meet the following format requirements as specified in the Act:</p> <p>(1) Include both the existing policy or procedure and the proposed policy or procedure, with the proposed language in the text printed in boldface type and underscored;</p> <p>(2) All present policy or procedure language and punctuation which are to be deleted shall be struck through.</p>
<p>9/3/2019 10:46</p>	<p>2019-HBL-1 Modifier Usage RP (4.19.19)</p>	<p>After reviewing Exhibit A: Reimbursement Modifiers Listing*, I noticed that modifier 62 is being changed from "Cosurgeons" to "Two Surgeons". By any chance, can modifier 62 continue to be listed as "Co-Surgeon" to assure it cross references with 2019-HBL-2 Modifier 62 (8.1.19) reimbursement policy which will also support the use of the standard medical terminology?</p>