



VIA ELECTRONIC TRANSMISSION

August 15, 2006

Ms. Lucille Weeks
Division of Policy
Office of MaineCare Services
11 State House Station
Augusta, ME 04333-0011

Re: NEMED Proposed PA Changes

Dear Ms. Weeks,

In response to the deputy commissioner's request of July 26, 2006 for input and suggestions on how to improve MaineCare's prior authorization process, please accept this response on behalf of the members of the New England Medical Equipment Dealers Association (NEMED). NEMED is a regional trade association comprised of the six New England states. Our members provide durable medical equipment, respiratory, custom wheelchairs/assistive technology and home infusion therapy to approximately 80% of the Medicaid beneficiaries in the State of Maine.

Based on input from our Maine members, NEMED recommends the following:

- Remove requirement for PA for K0108 when the item is under \$499.99.
- Any repairs under \$1,000 should not be PA'd because they are never denied.
- Keep the emergency rental PA policy in force; but remove the PA requirement for any item that is prescribed for 3- months or less, or is under \$100.
- Eliminate PA for CPAP and require that the provider should have appropriate documentation in the patient's file for audit purposes. No other payor requires a PA. OR
 - Eliminate the requirement to resubmit authorization forms and prescriptions when equipment reimbursement changes from rental to purchase, i.e. CPAP is paid as a rental for the first 3 months until compliance can be measured. In this case, we go through all the necessary steps to establish rental reimbursement from day 1. Once compliance has been obtained and it is deemed beneficial, the State will then purchase the equipment for the patient. In order for this to occur, we have to resubmit the same paperwork that we submitted initially, which they should already have set up in there system. This will eliminate duplication of paperwork.

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- Eliminate annual retesting for oxygen recertification for chronic diagnosis, such as COPD. Currently, MaineCare is the only payor that requires this. This is not required by Medicare.
- Consider pneumonia as a “short term” qualifying diagnosis for oxygen therapy and only PA if the therapy is needed for more than 3 months. Medicare accepts this diagnosis as a 3-month qualifier. Since the State indicates that they follow Medicare guidelines, there is considerable confusion for the ordering physicians when they feel the therapy would benefit a patient with this issue.
- Have a CRTS/ATS/ATP on staff to provide information or review the claim on equipment that the reviewers are not familiar with. The State could educate their staff or have access to industry experts. In the event of the latter, the State should black out the name of the provider on all forms before sending to the expert for privacy purposes. NEMED could provide list of experienced providers if requested.
- Providers **and PA reviewers** need clearly written procedures and guidelines (including how to compute reimbursement) on how to complete the PA form. Providers get inconsistent answers and denials from each reviewer. PA reviewers also do not compute reimbursement in a consistent manner.
 - Example: One PA request for a Light therapy box might require the invoice and the doctor's order, while another request for the same item might require the invoice, the doctor's order, and additional supporting letter from a psychiatrist. This process could be streamlined for both providers and MaineCare PA reviewers if providers knew what documentation was needed up front. This would also prevent unnecessary delays in delivering equipment to Medicaid beneficiaries.
- Reduce the time allowed to review claims to 14 days instead of 30. This would allow the clients to get the equipment quicker.

There are many new codes that were added to the most recent fee schedule that require a PA when it was not required previously. We recommend that the PA requirement be removed from the following new codes:

E2205	E2211	E2217	E2223
E2206	E2212	E2218	E2224
E2207	E2213	E2219	E2225
E2208	E2214	E2220	E2226
E2209	E2215	E2221	
E2210	E2216	E2222	

We recommend removing the PA requirement from the following codes when they are supplied as a replacement part:

E0955	E0957	E0978
E0956	E0960	E0982

Ms. Lucille Weeks
Page 3

Thank you for the opportunity to provide input into this process. If you have any questions or need clarification on any of the above recommendations, please contact me at 508-993-0700 or Jim Greatorex (Black Bear Medical) at 207-871-0008.

Sincerely,

A handwritten signature in black ink that reads "Karyn Estrella". The signature is written in a cursive style with a large, looping initial "K".

Karyn Estrella
Executive Director