

DEPARTMENT OF HEALTH AND HUMAN SERVICES
OFFICE OF DIRECTOR

ACTION REFERRAL

TO	DATE
<i>Mr. [unclear] / [unclear]</i>	<i>2-4-10</i>

DIRECTOR'S USE ONLY	ACTION REQUESTED
1. LOG NUMBER <i>101324</i>	<input type="checkbox"/> I Prepare reply for the Director's signature DATE DUE _____
2. DATE SIGNED BY DIRECTOR <i>Cleared 2/26/10, letter attached. C: Emma Jacobson</i>	<input checked="" type="checkbox"/> Prepare reply for appropriate signature DATE DUE <i>2-16-10</i>
	<input type="checkbox"/> FOIA DATE DUE _____
	<input type="checkbox"/> Necessary Action

APPROVALS (Only when prepared for director's signature)	APPROVE	* DISAPPROVE (Note reason for disapproval and return to preparer.)	COMMENT
1.			
2.			
3.			
4.			

COMPREHENSIVE BEHAVIORAL CARE, LLC
1620-B LADY STREET
COLUMBIA, SC 29201
(P) 803-451-7600 (F) 803-451-7604

February 3, 2010

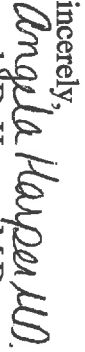
Emma Forkner
Director of Medicaid
P.O. Box 8206
Columbia, SC 29202


Dear Ms. Forkner:


Please find enclosed a letter from our practice's billing manager detailing significant difficulties that our practice has been having over the last two year receiving reimbursement for inpatient psychiatric and substance abuse treatment that we have provided for Medicaid patients. Ms. Skiest has spent hundreds of hours with your personnel attempting to satisfy you so that we can receive payment for services that we have provided to these patients. She has been met with countless roadblocks despite her efforts.

As she noted, you have admitted that this problem has occurred due to a glitch in your system because it does not recognize a legitimate inpatient service code. The three physicians in our practice are owed thousands of dollars over the last two years due to the delay in payment. I would hope that in this age of attention to "health care reform" and the fact that many doctors refuse to treat Medicaid patients that you would be more concerned with fixing this problem immediately in order to retain physicians who are still willing to help Medicaid patients.

We feel that Ms. Skiest has made every attempt at working to provide your office with every document that you have requested and we feel that we have been exceedingly patient in waiting for reimbursement for services rendered. If this situation cannot be resolved and our outstanding bills paid within the next 30 days, we will be forced to proceed with legal action and we will also notify the media regarding the poor response that we have had from your agency.

Sincerely,

Angela D. Harper, M.D.
Psychiatrist/Addictionologist


Steve Merlin, M.D.
Internist/Addictionologist


Todd Engles, M.D.
Psychiatrist/Addictionologist

Comprehensive Behavioral Care
1620 B Lady Street
Columbia, South Carolina 29201

02/02/2010

To: Erica Dimes

Fr: June Skiest, Billing Manager

Re: Payment issues

Attached is the information you requested regarding the payment issues we discussed. As you will see the majority of these patients are inpatient. I have also included some of the other claims we are having difficulty in getting paid consistently.

I have been working on resolving these issues since early 2008. I have been in contact with Jeremy Harper on the proper way to deal with these rejections. From the very start, all of the confusion stemmed from the fact that these are Psychiatric patients. Each time I was advised on a different action to take and that is what was done. Everything from corrections and clarifications in red on the ECF to the filing with Managed Care and attaching the rejections to separating the claims and refiling them. I have also spoken with Bruce Harbaugh and Jocelyn Dawson when told this was a managed care issue. I have been on conference calls with managers and supervisors. As soon as the decision was made that it was an error on the part of Medicaid and the claims should have been paid, the responsibility was given to yet another person and I had to start all over.

In dealing with the Initial Psychiatric Exam (90801), I contacted Brenda Ford at Unison and the confusion was understood and their portion of the claim was paid promptly. I entered their payment and filed the rest of the claim with Medicaid for their portion. Rather than paying the claim, I was told that now the claims needed to be separated and filed independently in order to be paid. Meanwhile, time was passing and now I am being told that many of the claims are past the timely filing date. This is when I was referred to you. You confirmed that this was indeed a problem with your system. The fact that your system is not recognizing place of service code 51 as inpatient is a huge problem. The fact that this has gone undetected for at least two years is unbelievable. Bottom line is our physicians have needlessly gone without the compensation that was rightly due them. We are talking about thousands of dollars. That compounded with the man hours spent pursuing this issue are astounding.

Considering this has been an ongoing issue for two years, I don't think it is unreasonable to expect payment of all claims with place of service code 51. This includes 2007 and 2008 claims. Had we not pursued this issue so diligently, the error might have continued to go on undiscovered. I would appreciate your quick resolution and prompt response. If you have any questions, please call me at (803)451-7602.

CC: Managing partners, Director of Medicaid

Log # 324 ✓

February 26, 2010

Comprehensive Behavioral Care, LLC
1620-B Lady Street
Columbia, South Carolina 29201

Dear Drs. Harper, Merlin and Engles:

Thank you for your letter regarding the problems that your billing manager, Ms. June Skiest, has experienced as they relate to your practice's reimbursement for inpatient psychiatric and substance abuse treatment for our Medicaid beneficiaries. I understand your frustration, and have asked my staff to perform a thorough review of all the claims in question.

When speaking with Ms. Erica Dimes, a Team Leader in our Physician Services Division, she explained that your claims for visits performed as an inpatient psychiatric facility should not be subjected to the Psychiatric and Counseling policy's limitation that states all beneficiaries are allowed twelve mental health visits per state fiscal year (July 1st - June 30th). We are working as quickly as possible on correcting the systems issue that allowed this error to occur. We will be processing payment for the four (4) claims you submitted to us that fall under this error. This policy was effective beginning this state fiscal year (July 1, 2009). From April 1, 2009 to June 30, 2009 the policy allowed six mental health visits per state fiscal year. All claims prior to April would not have been affected or rejected because a limitation on mental health visits was not in effect.

Additionally, you have mailed a number of Edit Correction Forms (ECFs) that have had multiple rejections and denials. Your rejected claims and ECFs include edit codes that tell, explicitly, why your claims have not been processed. Your claims range from 2007-2009 dates of service. In an effort to address each claim individually, we have listed them on a spreadsheet that details why each claim rejected and what steps have been or can be taken to process correctly. Those edit codes also provide resolution steps. In order for your claims to process correctly when denied, your claim or ECF must be corrected (according to the resolution steps) and submitted back to South Carolina Medicaid. We recommend you view our online Physicians, Laboratories, and Other Medical Professionals manual at www.scdhhs.gov to review our policy as well as all edits and carrier codes. The manual list the edits, their meanings and the steps necessary to resolve each edit.

We would welcome the opportunity to provide an educational training session here at the Agency for your billing and office staff. This training may alleviate some of the repeated errors on your claims.

We appreciate you taking the time to contact us, and for your continued participation in the South Carolina Medicaid program. If you have any additional questions or need any further assistance, please do not hesitate to contact Ms. Erica Dimes, Team Leader, at (803) 898-2660.

Sincerely,


Felicity Costin Myers, Ph.D.
Deputy Director

FM/gwds
Attachment