

## BCBSNM Comments for Notice of Opportunity to Comment: SPA 24-0015

SECTION/LANGUAGE	MCO FEEDBACK ITEM/QUESTION	HCA RESPONSES																									
<p style="text-align: right;">Attachment 4.19 – B Page 3aa</p> <p>4. Accredited Residential Treatment Centers for Adults with Substance Use Disorders – Prior to January 1, 2025 reimbursement <del>Reimbursement</del> is made at a facility specific daily rate established by the agency state audit agent after analyzing the costs to provide services. Room and board costs are not included in the rate and are not reimbursable. Cost that are considered in the rate are: direct service costs, direct supervision costs, therapy costs including all salaries, wages, and benefits associated with health care personnel, admission discharge planning, clinical support costs, non-personnel operating costs including expenses incurred for program related supplies and general administration costs. <del>ARTC's have a cost-based reimbursement and is specific to each agency these rates are not publicly published. During the rate calculation process several key factors are reviewed by the agency and the providers upon approval of rates.</del></p> <p>Beginning January 1, 2025, Tier I services are reimbursed at a statewide prospective rate established by the State of New Mexico.</p> <p>Beginning January 1, 2025, Tier II and III services are reimbursed at the greater of the facility specific daily rate previously established or the statewide prospective rate established by the State of New Mexico.</p> <p>Except as otherwise noted in the State Plan, the State-developed rates are the same for both governmental and private providers.</p>	<ul style="list-style-type: none"><li>• Tier I:</li><li>• Tier II and Tier III: Recommend prospective rate be adopted for all tiers, due to efficiency.</li><li>• <i>Except as otherwise noted in the State Plan, the State developed rates are the same for both governmental and private providers.</i><ul style="list-style-type: none"><li>• Turquoise Lodge Hospital rate for Tier II is \$391.23.</li></ul></li></ul>	<p>Thank you for your comment. Services are reimbursed at the greater of the facility specific daily rate previously established or the statewide prospective rate established by the State of NM.</p>																									
<p>Accredited Adult Residential Treatment Center (AARTC) for SUD Proposed Fee Schedule</p> <table><tr><th>RENDERING PROVIDER REQUIRED</th><th>REVENUE CODE</th><th>CPT OR HCPCS CODE</th><th>DESCRIPTION WITHIN MEDICAID PROGRAM</th><th>FEE SCHEDULE AMOUNT</th></tr><tr><td colspan="5">Residential Treatment Centers for Adults (Substance Use Disorders)</td></tr><tr><td>Report Referring or Ordering Provider in the Attending Provider Field</td><td>1003</td><td>H0017</td><td>Tier 3 - ASAM levels 3.7 and 3.7WM placement criteria for medically monitored short term residential addiction program.</td><td>\$249.04/day</td></tr><tr><td>Report Referring or Ordering Provider in the Attending Provider Field</td><td>1003</td><td>H0018</td><td>Tier 2 - ASAM 3.2WM, 3.2, 3.3, 3.5 placement criteria. Clinically monitored, medium to high intensity level of care for sub-acute, detoxification and/or residential addiction program.</td><td>\$349.76/day</td></tr><tr><td>Report Referring or Ordering Provider in the Attending Provider Field</td><td>1003</td><td>H0019</td><td>Tier 1 - ASAM 3.1 placement criteria. Clinically monitored, low intensity level of care long-term residential (non-medical, non acute care in a residential treatment program).</td><td>\$607.98/day</td></tr></table>	RENDERING PROVIDER REQUIRED	REVENUE CODE	CPT OR HCPCS CODE	DESCRIPTION WITHIN MEDICAID PROGRAM	FEE SCHEDULE AMOUNT	Residential Treatment Centers for Adults (Substance Use Disorders)					Report Referring or Ordering Provider in the Attending Provider Field	1003	H0017	Tier 3 - ASAM levels 3.7 and 3.7WM placement criteria for medically monitored short term residential addiction program.	\$249.04/day	Report Referring or Ordering Provider in the Attending Provider Field	1003	H0018	Tier 2 - ASAM 3.2WM, 3.2, 3.3, 3.5 placement criteria. Clinically monitored, medium to high intensity level of care for sub-acute, detoxification and/or residential addiction program.	\$349.76/day	Report Referring or Ordering Provider in the Attending Provider Field	1003	H0019	Tier 1 - ASAM 3.1 placement criteria. Clinically monitored, low intensity level of care long-term residential (non-medical, non acute care in a residential treatment program).	\$607.98/day	<p>1. Below is an example of the rates approved and effective for an AARTC provider. The proposed rates do not appear to coincide with the correct ASAM Tier. Recommend reassessing. (It seems backwards in that the higher-level intensity services are reimbursed lower than the lower intensity services. The lowest level intensity is being proposed at a daily rate that is nearly equal to our acute care rates)</p>	<p>The State agrees and has corrected the table to reflect the correct association with the tiers.</p>
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Day Weighted Reimbursement F	
ASAM Tier	
ASAM Tier 1 (3.1)	\$
ASAM Tier 2 (3.2WM/ 3.5)	\$
ASAM Tier 3 (3.7/ 3.7WM)	\$

2. Will the state continue to pay an additional \$50.00 per client per day of AARTC services for room and board, billed through the BHSD star system? Please confirm.
3. Will providers be allowed to continue to bill for the ASAM assessment, H0002?
4. We have seen an increase in approved AARTC services and expect the new prospective rates to attract new providers to New Mexico. What steps is HCA taking to minimize approving "questionable" providers?
5. Will the newly establish prospective rates for Tier 1, Tier 2, and Tier 3 apply to out of state providers? Members will likely end up in these facilities.

2. The room and board reimbursement is a state funded program and outside of the scope of this SPA. This SPA creates no changes to the state funded program.

3. Yes.

4. BHSD certifies AARTC Providers prior to their eligibility to enroll as a Medicaid Provider, as outlined in NMAC.

5. Yes, the rates will apply to all enrolled providers. NM is increasing our rates to be commiserate with other states reimbursement in order to encourage increased capacity within the state.