



Ohio Department of Mental Retardation and Developmental Disabilities

Ted Strickland, Governor

John L. Martin, Director

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To: County Board of MRDD Superintendents County Board of MRDD Waiver Contacts
County Board of MRDD COG Directors County Board of MRDD SSA Directors
Ohio Association of County Boards MRDD County Board of MRDD Business Managers
Ohio Provider Resource Association

From: Patrick Stephan, Deputy Director, Medicaid Development and Administration, ODMRDD

Subject: **Prior Authorization**

CATCHING UP:

We have, for the most part, eliminated the back log of Prior Authorizations which developed during the time crunch associated with the final stages of transition to the new waiver reimbursement system. We are now dealing with requests that are much more current in nature, and have turned our attention to some of the trends and process difficulties associated with the Prior Authorization System. Our overarching goal is to simplify the system, while continuing to ensure system integrity and compliance. In doing so we are working diligently to adhere to faster turn-around times with requests received; hopefully this will help the planning process at the local level.

TRENDS & CHALLENGES:

PA Requests:

We receive many Prior Authorization requests which arrive at the very end or after the end of the waiver span. This is sometimes due to life events that happened late in the span, but often it is because the provider has utilized HPC services at a faster pace than expected, earlier in the span and the reasons are less clear.

Although we recognize that emergencies can occur at anytime, we believe that the filing of PA requests near or after the span is over should only occur under the rarest of circumstances.

Cases that we are not able to approve are sent to ODJFS for final review within 5 days of a *complete* PA request. All PA requests forwarded to ODJFS include a recommendation from ODMRDD. Our recommendations sent to ODJFS for requests which come in after the span or service delivery, will be based at least in part on the timeliness of the request. Prior Authorization requests are not approved retrospectively.

“Alternative” Prior Authorization requests submitted to ODMRDD by County Boards of MRDD will be reviewed collaboratively with ODJFS on a case by case basis.

Prior Advice:

Work with families / guardians to submit Prior Authorization requests at the point that it is **known** that services will drive the waiver costs above the designated ODDP range. Pay particular attention to this when the county does not plan to support the request.

Closely monitor **utilization**. This cannot be stressed enough; the attached user guide will illustrate in detail how to access the existing utilization review reports on-line. While we are looking to enhance these and make them more easily obtainable, the reports are currently available.

Short spanning of PAWS should not be used means to avoid or delay the Prior Authorization process. If an individual runs out of units/dollars and a Prior Authorization has not been approved, it will likely be problematic to have those services paid through the waiver after the fact.

Stay Put:

We have received questions from providers and county boards about individual's rights to maintain higher levels of service pending a hearing, *after* their Prior Authorization requests have been denied. The Department's review of the rules indicates that there is no "*stay-put*" provision associated with PA denials. The PA itself is a request for *additional* services. Stay puts generally apply to proposals to withhold, reduce, suspend or terminate existing waiver services.

Daily Billing Unit & Prior Authorization:

ODJFS and ODMRDD closely examine individuals whose daily billing exceeds the \$403.98 threshold as noted in earlier communications. While not all of these cases will lead to a Prior Authorization, those that do require a timely request. Please keep this threshold in mind moving forward as significant provider payment delays can result if all applicable work has not been completed. We do not anticipate payment for claims exceeding \$403.98 if a Prior Authorization request is necessary but not yet approved.

Data:

While ODMRDD is relying on County Boards to provide considerable insight/administrative direction on PA requests, we are also actively monitoring Prior Authorization data to identify system trends. Examples include: request % by County, support/non support information, timeliness of requests, primary reasons for the requests, cost indicators and other related topics. Some preliminary data will be shared soon.

LONGER TERM SIMPLIFICATION:

The Prior Authorization Rule is an addendum to the IO Waiver itself, which makes substantive changes to our process and the procedures complicated at the present moment. Some points of focus we would like to see accomplished within the next year in order to make the process more efficient are noted below:

- Development of a Prior Authorization Web Portal to replace the current paper process, and connect to the web-based cost calculation system and work in conjunction with PAWS.
- We are examining situations which might be excluded from the PA process and looking into an “emergency process” which would be immediate and less involved.
- Making certain documents merely available on demand, as opposed to being required as part of the submission request.

ADDITIONAL RESOURCES:

Thank you for your continued hard work within the existing Prior Authorization process. Please keep in mind the Prior Authorization list serve as a means to address questions that you may have; the email address is prior-authorization@odmrdd.state.oh.us. The Prior Authorization fax number is: 614.752.5303

You can also contact the PA Unit Manager, Charlie Flowers at 614-466-5990 or charles.flowers@dmr.state.oh.us. We are attempting to continuously update information related to Prior Authorization on our website at <http://mrdd.ohio.gov/medicaid/priorauth.htm>

Thank you.

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