

From: [Janet Zamzow Bliss](#)
To: [OIC Rules Coordinator](#)
Subject: authorizations comments
Date: Friday, June 17, 2016 4:15:23 PM
Attachments: [20160617160220030.pdf](#)
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Dear Mr. Freeburg,

I am submitting comments on the prior authorization process. The agency I work for is one of 13 Neurodevelopmental centers in Washington state and the population we serve tends to require weekly services over a life-time. The current authorization process isn't designed to accommodate the needs of the families we serve. As an introduction to our organization, we were founded in 1979, and the mission of Children's Therapy Center (CTC) is to maximize the potential of children with special needs. Last year Children's Therapy Center provided services to over 3400 children with special needs. We are the biggest and most comprehensive nonprofit pediatric therapy program in the state, with a service area of over 300 square miles and 3 locations. We provide a comprehensive range of services such as:

- Center-based physical, occupational, speech and feeding therapy for children aged birth to 18
- Home-based physical, occupational, speech and feeding therapy for developmentally delayed children aged birth to 3
- Parent/caregiver education, coaching, and support
- Early special education classes and inclusive playgroups that are open to children with special needs and typically-developing children from the community
- Family resources coordination
- Social work services for young, trauma-exposed foster children
- Custom foot and ankle orthotics
- Stabilizing Pressure Input Orthoses (SPIO[®]) Compression garments
- Durable medical equipment such as walkers
- Aquatic therapy
- Therapy groups focused on feeding, fitness, social skills, and other skills

These services help children with special needs meet developmental milestones, achieve school readiness, reach their highest possible degree of functioning, and reduce their need for future

services.

100% of the children we serve have developmental disabilities and delays such as Down syndrome, spina bifida, cerebral palsy, autism spectrum disorder, or medical conditions that inhibit the development of gross or fine motor skills, speech, cognition, self-help skills, or social-emotional competence. We work with a unique population which in turn, comes along with unusual challenges when trying to obtain authorizations to provide services. Our current authorization challenges are as follows:

- Timeliness – it can take weeks if not months to acquire authorizations and during that timeframe, the child isn't able to receive services
- Limited authorizations – authorizations are being given that limit use to anywhere from 2-6 services. At that point we are required to submit "standardized" test score so that the authorization department can review the scores and evaluate the need for on-going treatment. While I understand that in a therapy rehab environment, this protocol is warranted, it doesn't work well for the special needs population as it delays and interrupts services. (example attached)
- Authorization geared toward discharge – authorization are being received with the aim to wean the child from services. The attached example reflects 9 authorized visits over a two month time frame with the request to stretch the visits to last the duration of the time frame. Many of the children we serve attend therapy once per week. This type of authorization leaves the child with 2 weeks of uncovered services and leaves the therapy provider with openings in a weekly schedule that are difficult to fill
- Delays – while the existing law requires a 48 hour turn around response to an authorization request, the authorization departments will often delay the timeline by requesting medical records and then claim not to have received them, thereby requesting the same records multiple times.
- Coding Issues – with the onset of ICD 10 and the addition of more descriptively detailed codes, many of the authorization requests we send for children with a variety of developmental delays are returned to us denied as not a medically necessary treatment

I realize that CTC is a specialized service provider, but to speak to your request regarding:

- "What are some best practices to streamline the prior authorization process" – Acknowledge that the authorization process for the developmental disabled and delayed population should be reviewed to allow the ability to address the unique needs of this group
- "What has not worked in streamlining prior authorization" – Allowing exceptions to the 48 hour rule which allows loopholes and delays the delivery of services
- "What deficiencies exist in our current regulations regarding prior authorization" – Treating the special needs population as if they were receiving services for rehabilitative therapy

Thank you for the work that your office does and the effort to streamline the prior authorization process. I appreciate having the ability to submit comments.

Regards,

Janet Bliss

Janet Zamzow Bliss

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Confidentiality Notice

Date: 5/25/2016

CONFIDENTIAL

Authorization Number: A078722475
Member Name:
Member Number:
Service: Occupational Therapy
Visits Approved: 2
Service Units: 8
Requesting Provider: CHILDRENS THERAPY CENTER

Stop 4/7
This auth was requested to add Aqua therapy to existing services.

Dear PARENT/GUARDIAN OF

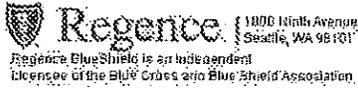
On behalf of our members, REGENCE BLUESHIELD WA contract with CareCore National, LLC d/b/a eviCore healthcare (eviCore) to review requests for certain services to make sure they are medically necessary and appropriate. Your provider has asked for the services referenced above on your behalf.

All requests for services are reviewed for medical necessity using established medical criteria.

After reviewing the information available, part of the services requested have been approved as medically necessary, and part of the services have been denied.

We authorize 2 visit(s) and 8 service units for the period of 5/27/2016 to 6/26/2016. The service units refer to the increment of time bills to REGENCE BLUESHIELD WA from your health care provider, such as a 15-minute service unit. The number of service units may vary based on the treatment plan and type of services provided. The number of authorized visits includes the initial evaluation.

Information that is necessary to make a decision is missing. Please send current tests scores and measurements. Standardized test scores are needed to see how your child's abilities compare with her same age peers. Also the start date your child's therapist asked for does not meet medical need. Visits were already approved for this time period. More visits are approved with a new start date of 5/27/16. Once we receive your new information, we will review the case and make a decision. One visit is approved to prevent a gap in care and allow your child's therapist to collect the requested information.



Date: 5/24/2016

CONFIDENTIAL

Authorization Number: A078649048
Member Name:
Member Number:
Service: Occupational Therapy
Visits Approved: 9
Service Units: 36
Requesting Provider: CHILDRENS THERAPY CENTER

Dear PARENT/GUARDIAN OF

This letter is to inform you of approval for the above referenced services as requested by your healthcare provider. We are authorizing 9 visit(s) and 36 service units for the period of 5/17/2016 to 7/16/2016.

According to the available information and the history presented, the services requested have been approved. With next request, please include progress on all goals and progress with daily functional activities.

Please spread the visits out through the entire approval period to avoid a gap in care.

The number of authorized visits include the initial evaluation. The service units refer to the increments of time billed to REGENCE BLUESHIELD WA from your healthcare provider, such as a 15-minute service unit. The number of service units can vary based on the treatment plan and type of services provided.

On behalf of our members, REGENCE BLUESHIELD WA contracts with CareCore National, LLC d/b/a eviCore healthcare (eviCore) to review requests for certain services to make sure they are medically necessary and appropriate. We have reviewed this request for medical necessity using established medical criteria.