

Date: September 30, 2016

Re: Public comment received for GCR 16-021 Hospital-Based Intensive Outpatient/PHP Reimbursement

Comment:

To Whom It May Concern:

I am submitting this public comment on behalf of the University of Vermont Medical Center regarding the Department of Vermont Health Access's (DVHA's) proposed change in reimbursement rates for partial hospitalization programs (PHP) and intensive outpatient programs (IOP).

We have gone through a thorough evaluation of our billing and reimbursement for IOP and PHP services provided at the UVM Medical Center, because IOP and PHP are crucial components of the continuum of care for serious mental illness, and we must ensure the adequacy of the services we provide. True to the intent of the IOP and PHP programs, without these clinical services, we would see a significant increase in the need for inpatient hospitalization for patients with severe psychiatric illness.

At the conclusion of our billing and reimbursement review, we have determined that we have been inaccurately billing for the IOP services that we provide. It appears that, since the end of 2013, for reasons not entirely clear at this time, we only billed for one unit per day, rather than for the actual number of units provided. The result is that, since the end of 2013, we have been providing a significant amount of service through IOP but not billing for it. The total impact is approximately \$200,000 per year.

The billing problem means that a comparison of the proposed rates to historical reimbursements would be misleading. It is likely that the proposed rates would result in a reimbursement well below our costs.

Given the significance of what we have discovered through our analysis, we respectfully request that DVHA suspend any action on changing its rates until we have collectively had an opportunity to review data and discuss the impact of this change on the services that we provide.

Respectfully,

Robert A. Pierattini, MD, Chief of Psychiatry
University of Vermont Medical Center

