

From: Melissa Todd <mtodd.phd@gmail.com>
Sent: Wednesday, September 8, 2021 2:22 PM
To: SOUCY Cassandra * DCBS <Cassandra.Soucy@oregon.gov>
Subject: OIMHP comments on MMARR

Dear Cassandra,

Please accept OIMHP's comments and feedback surrounding the discussion of Median Maximum Allowable Reimbursement Rate (MMARR). This is an important part of the bill for our organization and we wanted to give as much context as possible to assist in crafting rules that reflected our intention for including this new concept in HB 3046.

Below are links to the two Milliman reports referenced in the attached memo. Please note that the 2017 report compared medical/surgical to only prescribing psychiatric mental health (MH) providers on reimbursement rates for low- and moderate-complexity E&M office visits. Non-prescribing MH providers cannot bill for these services. This effectively minimized the degree of reported reimbursement disparities in Oregon, as prescribing psychiatric MH providers are often treated differently than non-prescribing MH providers by insurers. In other words, prescribing MH providers are often treated more similarly to medical/surgical providers. However, the 2019 report combined both prescribing and non-prescribing MH providers which exposed a much greater degree of disparity in reimbursement differences between medical/surgical providers and all MH providers in Oregon (see page 70). In fact, the disparity worsened over time between 2013 and 2017.

December 2017

<https://www.milliman.com/-/media/milliman/importedfiles/uploadedfiles/insight/2017/nqtl%20disparityanalysis.ashx>

November 2019

https://assets.milliman.com/ektron/Addiction_and_mental_health_vs_physical_health_Widening_disparities_in_network_use_and_provider_reimbursement.pdf

Please let me know if you have any questions about the attached memo or the Milliman reports. Thank you for your time and consideration.

Warm regards,

Melissa Todd

Melissa Todd, Ph.D.

Licensed Psychologist

1849 Willamette St, Suite 5

Eugene, OR 97401

(541) 513-6336 (office)

(541) 600-3320 (secure fax)