

**From:** Sadie T Ellwood  
**Sent:** Tuesday, December 4, 2018 2:54 PM  
**To:** CHENG Alexander S \* DCBS  
**Cc:** Sadie Ellwood  
**Subject:** KFHPNW Comments on Balance Billing

Good afternoon Alex,

I want to thank you for the opportunity to participate in the Rulemaking process and provide comments for consideration. Requested feedback by the Division is below.

Geographic adjustments:

We still recommend aligning with the market and using the Geographic Price Cost Index (GPCI). Adjusting the reimbursement rates based on the Center for Medicare and Medicaid GPCI would be consistent with current claims-paying practices across the nation and would be simpler for health plans and providers to administer.

CPI Adjustment:

We agree that the January 2015 to July 2018 time period chosen reflects the closest to the intent of SB 1549 and is also the easiest to administer based on available data.

Obstetrical Anesthesiology Services:

We feel that the proposed rules adequately accommodate obstetrical anesthesiology services and we do not believe that a special formula is necessary.

AD Modifier for Anesthesia - Related Procedures:

For administrative simplification purposes, we do not believe the AD modifier needs to be used for anesthesia-related procedures in the rule. The modifiers currently in rule and the fee schedule adequately reflect current claims practices.

Again, we appreciate your time and diligence on this complicated topic and Rulemaking process.

Sincerely,

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