

Public Comments for: Chapter 504 Substance Use Disorder Services

Effective Date January 1, 2023

<u>Number</u>	<u>Date Received</u>	<u>Comment</u>	<u>Response</u>
1	11/30/2022	<p>While I understand the hesitancy for service not to be conducted during transportation, it should be noted that a great amount of time with clients is spent during non-billable transportation times and there are quality support services being rendered. I would encourage BMS to take a look at the transportation exemption and find a good middle ground to allow for flexibility here since that is a “natural environment” for the majority of these clients and they feel comfortable talking in this private setting. I would suggest maybe a cap on how many units may be billed during transportation on a monthly basis.</p>	<p>Thank you for your comment. PRSS services cannot be rendered while in active transportation. No change required</p>
2	11/30/2022	<p>Pg 27, 504.18 Residential Adult Services - This proposed version still states “Medicaid members accessing RAS may not receive Day Treatment or Assertive Community Treatment services.” In a conversation with BMS earlier this year, it was determined that ACT clients may receive RAS services and maintain their ACT authorization, but both services cannot be billed simultaneously.</p> <p>Recommendation - either remove this or clarify it, something to the effect: Medicaid members accessing RAS who also receive Day Treatment or Assertive Community Treatment Services may maintain their authorization but not bill/receive Day Treatment or Assertive Community Treatment services simultaneously while meeting medical necessity and receiving RAS.</p>	<p>Thank you for your comment. BMS will take your comment into consideration for a future update. No change made at this time.</p>

