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January 3, 2020

Dennis Schrader  
Medicaid Director  
Maryland Department of Health  
201 West Preston Street  
Baltimore, MD 21201

Dear Mr. Schrader:

On behalf of our 68 members, I thank you, the Department staff, and Optum for your hard work to ensure a smooth ASO transition. We appreciate the Department's efforts and your commitment to a feedback loop with the provider community.

We are writing to urge the Department to make a definitive decision as soon as possible on issuing prospective payments to providers. From earlier conversations, we understand that the Department has been researching the ability to provide prospective payments. We appreciate the challenges you have enumerated, including compliance concerns and the need for strong provider payback provisions, and agree that this is not an optimal approach.

However, for the reasons outlined below, prospective payments may be the only way to maintain access to services for those in need of behavioral health treatment as we collectively work to solve the system's current inoperability.

CBH has surveyed its members and received responses from 97% of them. Of those, 79% indicate that they are experiencing one or more barriers to completing registration with the new ASO vendor. Without complete registration, providers will not be able to secure full payment.

Providers have not been able to test the revised authorization and claims processing system. They will not be able to work with their EMR vendors over the weekend to make any needed modifications to their systems if problems arise on their end. As a result, any providers facing problems may not be able to secure payment from Optum next week, even if no further problems arise.

Beacon's payment delays compound the situation. Providers have experienced significant but variable shortfalls in Beacon's recent payments, and this week's payments have not hit bank accounts.

Finally, our members have reported significant functionality limitations with Optum's authorization and eligibility verification systems. While we understand that Optum is making changes as we speak, our members have not had sufficient opportunity to view and test the revised system.

These weaknesses are cumulative. Given the number and seriousness of significant problems that threaten or erode payments to providers, we urge you to consider prospective payment as a method of securing the time needed to ensure that Optum's system is truly fully functional.

As always, we appreciate your thoughtful attention to these concerns, and we stand ready to assist the state in any way that we can. If you need additional information, do not hesitate to reach out to me at (410) 788-1865 or [shannon@mdcbh.org](mailto:shannon@mdcbh.org).

Sincerely,



Shannon Hall, J.D.  
Executive Director

cc: Scott Greene, Optum Maryland