

March 14, 2023

Ian Grossman
Testimony Letter
RE: Support of Bill BH 2455

TO: Chair Nosse and Members of the House Committee of Behavioral Health and Health Care:

My name is Ian Grossman and I am the Practice Manager at an outpatient mental health practice of 25 providers. I would like to voice support for HB2455. I have first hand knowledge and experience regarding how audits and the confusing expectations of commercial and medicaid insurance documentation causes burnout and stress among both providers and administrative support staff.

Our practice contracts with both national and local insurance companies. Our staff has poured over provider manuals and sent many emails trying to get specific standards on how to document psychotherapy sessions. We are only provided vague responses over email and even more vague information in provider manuals. For instance when we look at our provider manual for PacificSource, there is nothing we can find about documentation. We were forced to google, only to find a separate policy (see link below) on mental health that offers basic information on clinical guidelines, but very little on what is expected to appear in the client record, including the assessment, treatment plan, and service note.

These vague and limited specific documentation standards create confusion, stress, and fear about what information an insurance auditor may deem is missing from the client record and this also changes based on who the auditor is, as there is no standardization. In turn, to ensure our practice is in compliance, we have dedicated countless administrative hours from both our administrative staff and providers to ensure the smallest details are present in client documentation. Whether those details are needed or expected is never known unless we get audited. All of the stress and fear associated with this has led to many of our providers either seeing less clients, taking long breaks, or leaving the field entirely. Good providers leaving the field creates less access, which leads to increased rates of client's needing higher levels of care since they are unable to obtain services when acuity is lower.

It is vitally important that HB2455 is passed to ensure providers are given specific standards on documentation, to ensure providers remain in the field and focus on quality care instead of fearing audits. Thank you for your consideration.

Ian Grossman
Practice Manager

PacificSource Behavioral Health Guidelines

(<https://pacificsource.com/sites/default/files/2022-12/Behavioral%20Health%20Outpatient%20Treatment.pdf>)

CC:

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