

Moving Forward, Staying Present LLC

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To Whom It May Concern,

I am writing to ask you to pass HB2455. I am an LMFT and am licensed in OR and WA. I own a group practice located in SE Portland. I am deeply concerned and troubled by the lack of protection behavioral health providers have from audits and I am equally troubled by the lack of transparency about what auditors are looking for. Our code of ethics requires us to be meticulously honest and detail oriented in our work with clients and with our billing. I am those things. If I had a clear list from each CCO or insurance company about what they expect from me and what they are looking for in an audit, I would happily comply with all of those expectations. What keeps me up at night is that I do not have clarity about what is expected from me in terms of documentation, what exact details each different company is looking for in an audit, and what I need to do to ensure that my documentation and billing matches exactly what they are looking for. I have seriously contemplated reducing our commercial insurance clientele in favor of private pay clients because I hear horror stories about one audit destroying a business. I did choose to decrease my work with Medicaid clients from 60% of our caseload to 30% solely because of audit practices. I am responsible for the wellbeing of my clients, but also for the clinicians who work for me. If an audit determines that I owe tens of thousands of dollars for some minor detail that I wasn't even aware of, then I can't pay my clinicians and we can't see our clients. It is my understanding that audit practices are not to look for fraud waste and abuse, but are designed to be a revenue stream for CCO's and commercial insurance carriers. Behavior health providers are already some of the lowest paid medical professionals, specifically those of us who work with insurance. Unchecked audit practices will make insurance companies more money and will ensure that behavioral health providers leave the field in droves.

Thank you for your time and consideration,

Maria L Williquette, LMFT