

**From:** [Pacheco ortiz, Michelle](#)  
**To:** [HSD-madrules](#)  
**Date:** Thursday, April 8, 2021 4:22:16 PM  
**Attachments:** [PHP Comments 4.8.21.doc](#)

---

Good Afternoon,

Please see attached comments from PHP regarding 8.321.2 NMAC Behavioral Health Services, Specialized Behavioral Health Provider Enrollment and Reimbursement.

Thank you,

Michelle Pacheco-Ortiz  
Presbyterian Health Plan, Regulatory Operations  
505-379-8275  
[mipachec@phs.org](mailto:mipachec@phs.org)

\*-\*-\* Presbyterian\_Healthcare\_Services\_DISCLAIMER -\*-\*-\*

This message originates from Presbyterian Healthcare Services or one of its affiliated organizations.

It contains information, which may be confidential or privileged, and is intended only for the individual or entity named above. It is prohibited for anyone else to disclose, copy, distribute or use the contents of this message. All personal messages express views solely of the sender, which are not to be attributed to Presbyterian Healthcare Services or any of its affiliated organizations, and may not be distributed without this disclaimer.

If you received this message in error, please notify us immediately at [info@phs.org](mailto:info@phs.org)  
If you would like more information about Presbyterian Healthcare Services please visit our web site <http://www.phs.org>



Health Plan, Inc.

P.O. Box 27489, Albuquerque, NM 87125-7489

April 8, 2021

Human Services Department  
Office of the Secretary  
ATTN: Medical Assistance Division Public Comments  
Centennial Care Contracts Bureau  
POB 2348  
Santa Fe, NM 87504-2348

Dear Secretary:

Thank you for allowing us the opportunity to review and respond to the proposed revisions to rules in NMAC 8.321.2 Specialized Behavioral Health Services. Please accept the comments for consideration in the final rule.

- Section 10 & Section 29  
PHP would like clarification on levels 3.2 and 3.7. Providers do not request authorizations and are not reimbursed for level 3.2, this would be considered an ambulatory detox.
- Section 11  
PHP would like to request to remove the statement “as a last resort based on public safety”. The member must still be deemed medically necessary to be admitted to an RTC and should not be deemed as an automatic stepdown to incarceration.
- Section 22  
Who will be ensuring providers receive the proper training and certification to provide services such as SBIRT? Will HSD/BHSD be monitoring this and notifying the MCOs when a provider is eligible or would this fall under the MCOs to ensure all certification/training is complete?
- Section 33  
In section 2-A LPATS are not listed as an independently licensed provider type as in previous sections. Please add LPATS to Section 33 or provide clarification.

Page 1 of 2

Such services are funded in part with the State of New Mexico.  
Presbyterian exists to improve the health of the patients, members, and communities we serve.

[www.phs.org](http://www.phs.org)

Thank you for allowing us the opportunity to provide comments.

Respectfully,

Michelle Pacheco-Ortiz  
Regulatory Operations Manager  
9521 San Mateo Blvd. NE  
Albuquerque, NM 87113  
(505) 923-5886

[mipachec@phs.org](mailto:mipachec@phs.org)

