

To Whom it May Concern,

I would like to voice our concern as an agency about billing code G0176 Activity Therapy for groups. Although we are grateful that such a code exists for the treatment we provide and diversifying the approaches to therapies that can be reimbursed for New Mexicans by HSD, in the HSD/MAD letter for the proposed code changes and additions, "*activity therapy*" has a group code which the session reimbursement rate is \$28.42. For the Mountain Center, this would not suffice due to the nature of the type of group therapy we provide. In order for us to use this code, we would need 4 times that as our groups often last three to four hours and in some case more. On the proposed fee schedule, "*activity therapy-group*" is listed as \$7.11/15 minute unit and once again the HSD through MAD letter on 12/18/18 states that it is \$28.42 per session.

Between the letter and the fee schedule with the remarks for "*activity therapy*", there is somewhat of a discrepancy in terminology. It seems to us that a therapist could bill only up to 4 units in this case? Is it possible to make this code billable for up to 12 or 16 units and not the proposed \$28.42 per session? If so, this would make it possible for us to provide activity therapy-group services using this code.

Also, if possible, making the Activity Therapy Group code G0176 requires one client note for the session instead of needing to have individual client notes for each hour on each client for group therapy such as when using 90853 code for three units. Currently, a group of 8 clients requires a therapist to write 24 individual client notes for one 3 hour group session. Other codes such as IOP

code H0015 do not require as much administrative documentation for group work, allowing for one group note with one individual documentation for each client that covers the length of group.

In the same proposed fee schedule and letter, it states that a Peer Support Worker can bill \$7.20 /15 min unit for group work. Having said that, what we are seeing is that a peer support worker would be paid more for group work than a licensed therapist. Is this true?

Please note that as an accredited Outdoor Behavioral Health organization that provides activity therapy as one of its core treatment modality, works primarily with groups and serves Medicaid eligible clients, we just could not justify billing the G0176 Activity Therapy Group code at the proposed reimbursement rate which would create a barrier to the services we could provide our clients. We are asking if this could change.

Thank you for your time and consideration on this matter.

Tony Dixon

A handwritten signature in black ink, appearing to read 'TAD', with a long horizontal flourish extending to the right.

Executive Director
The Mountain Center