

**Analysis of
New Hampshire Commercial Insurance Claim Data
Related to Substance Use Disorder:
Reimbursement Rates**

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Prepared by
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Aware of growing concerns regarding access to substance abuse treatment and with a view to informing related legislation, the New Hampshire insurance Department (NHID) is examining its data resources to get a clearer picture of these services in the commercially-insured population. A report completed earlier this year (February 2016) focused on utilization. This report highlights reimbursement rates.

Staff recruiting and retention has been identified as a problem in providing services to the population diagnosed with opiate substance use disorders both nationwide and in New Hampshire. According to a 2013 report to Congress, the federal Substance Abuse and Mental Health Services Administration acknowledged “the growing workforce crisis in the addictions field due to...an aging workforce, stigma and inadequate compensation.”¹ To assist in determining whether inadequate reimbursement levels may be a factor contributing to this issue in New Hampshire, the NHID requested this report.

Compass Health Analytics looked at the New Hampshire Comprehensive Health Care Information System (NH CHIS) to study reimbursement rates among the major commercial carriers for claims with a primary diagnosis of substance use disorder (SUD). The most recent information available covered claims with incurred dates from October 2014 through September 2015. While the analysis is aimed at understanding opiate SUD services, the volume of these specific services in the commercially-insured population is very low. Since many of the services are common to patients with any kind of SUD, the analysis was broadened to include behavioral health services for any SUD.

Table 1 displays the procedure codes included in the analysis. Two codes account for most of the volume.

Procedure codes used by only a single payer were excluded, as were those with outlier cost values. The code for group psychotherapy (90853) could not be included because reimbursement rates by claim varied so widely it was clear the services represented were not comparable. In addition to the procedure code selection, claims included in the analysis met the following criteria: the member was a resident of New Hampshire; the provider address was in New Hampshire; the insurance plan was commercial and not a Medicare- or other- supplement plan; the procedure code had no modifier; and the units of service equaled 1.

¹ Substance Abuse and Mental Health Services Administration (SAMHSA), U.S. Department of Health and Human Services. Report to Congress on the Nation’s Substance Abuse and Mental Health Workforce Issues. 24 January 2013; accessed 19 May 2016: <http://store.samhsa.gov/shin/content/PEP13-RTC-BHWORK/PEP13-RTC-BHWORK.pdf>.

**Table 1:
Procedure Codes Included in Analysis, by Volume**

Procedure	Service	# Claims	% Total
90834	Psychotherapy Patient &/ Family 45 Minutes	3,822	34%
90837	Psychotherapy Patient &/ Family 60 Minutes	3,814	34%
90853	Group Psychotherapy	1,181	10%
90791	Psychiatric Diagnostic Evaluation	802	7%
H0015	Alcohol and/or Drug Services; Intensive Outpatient	505	4%
99406	Tobacco Use Cessation Intermediate 3-10 Minutes	430	4%
90836	Psychotherapy Pt&/Family W/E&M Srvcs 45 Min	236	2%
90832	Psychotherapy Patient &/ Family 30 Minutes	223	2%
90833	Psychotherapy Pt&/Family W/E&M Srvcs 30 Min	106	1%
90847	Family Psychotherapy W/Patient Present	87	1%
90792	Psychiatric Diagnostic Eval W/Medical Services	74	1%
S9485	Crisis Intervention Mental Health Services, Per Diem	74	1%
TOTAL		11,354	100%

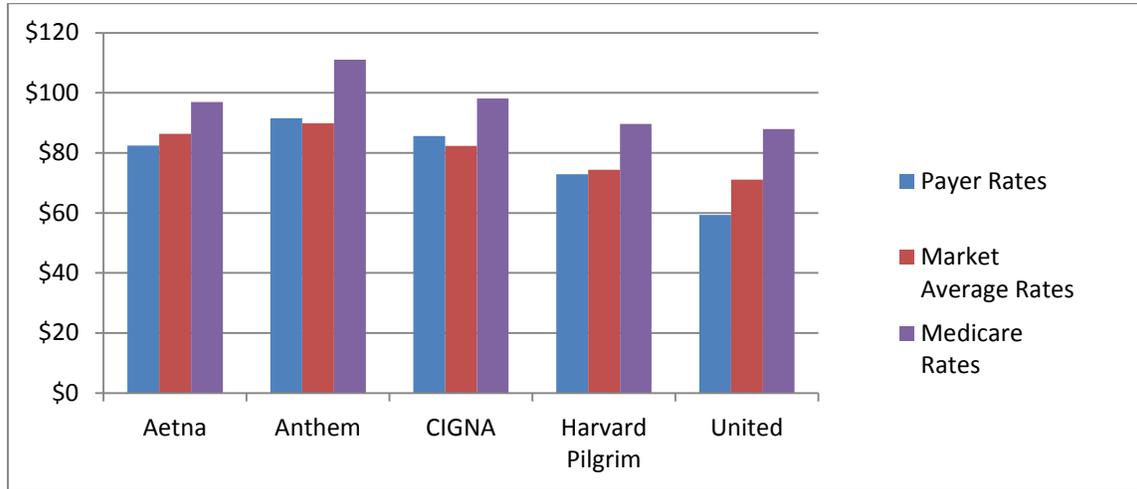
Reimbursement Rate by Payer

Publicly-available national average reimbursement rates for these services in the commercial market were not found. The average allowed amount² for each payer’s claims was compared with the mean value of those services using the NH commercial market average rate and with the value at the Medicare rate, as shown in Figure 1 and Table 2. Note that because each payer’s three average values are based on the claims from that payer – and the mix of services to which the reimbursement rates are applied differs from one payer to the next – the payer means cannot be compared directly to each other. Instead, the only valid comparison is among the payer’s average rate, the market average rate, and the average Medicare rate for each individual payer.

All payers in the New Hampshire market allow substantially lower payments than does Medicare. Cigna has the highest rate compared to the market average (+4%) for the claims it covered; United allows markedly less than the rest of the market (-17%). The relative positions of these payers compared to market averages and to Medicare did not change dramatically between 2014 and 2015.

² Allowed amount is the sum of the amount paid by the plan and the member contributions including copayment, coinsurance, and deductible.

**Figure 1:
Comparison of Payer Rates with Commercial Market and Medicare Rates
Selected Behavioral Health Services for SUD
October 2014 – September 2015**



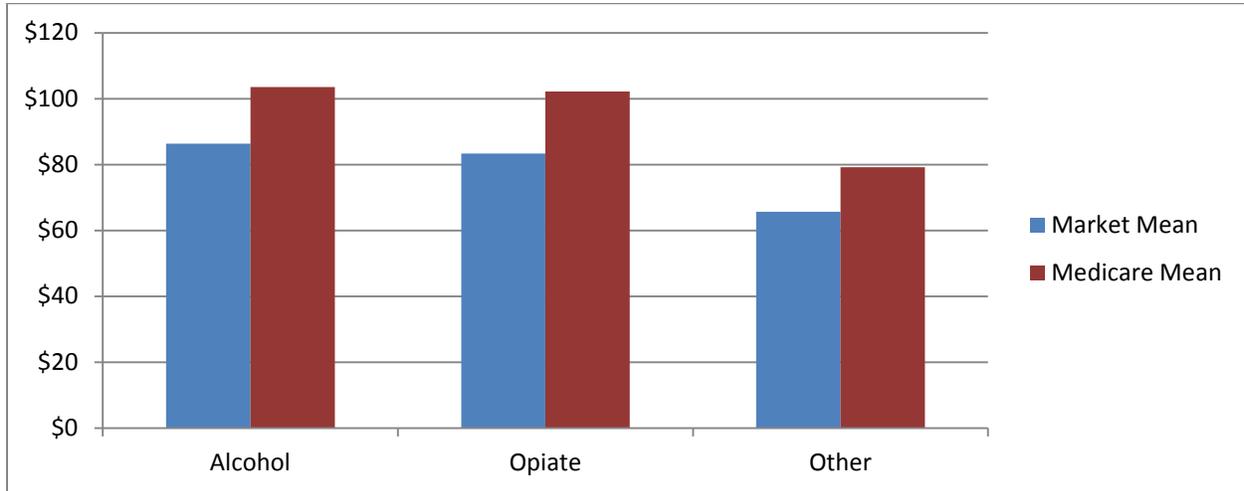
**Table 2:
Payer Rate Comparison for SUD Services**

Payer	Payer Rates	Market Average Rates	Payer Compared to Market	Medicare Rates	Payer Compared to Medicare
CIGNA	\$85.57	\$82.28	+4%	\$98.07	-13%
Anthem	\$91.53	\$89.83	+2%	\$111.01	-18%
Harvard Pilgrim	\$72.95	\$74.42	-2%	\$89.67	-19%
Aetna	\$82.45	\$86.31	-4%	\$96.99	-15%
United	\$59.32	\$71.09	-17%	\$87.91	-33%

Reimbursement Rate by Type of Disorder

Payment rates for SUD services do not vary widely based on the type of substance use for which a patient is receiving treatment. Again, commercial reimbursement rates are substantially below Medicare payments. Claims were categorized by type of SUD diagnosis listed (opiates and alcohol were separated and compared to all other SUD diagnoses grouped together). The mean commercial payments allowed for each category were then compared to the mean cost of claims paid at the Medicare rate, as shown in Figure 2 and Table 3.

**Figure 2:
Comparison of Rates by Type of Substance Use Disorder:
Selected Behavioral Health Services for SUD
October 2014 – September 2015**



**Table 3:
SUD Category Rate Comparison***

SUD Category	Commercial Market Mean	Medicare Mean	Payer Comparison to Medicare Mean
Opiates	\$86.02	\$105.70	-15%
Alcohol	\$88.78	\$108.31	-19%
Other	\$66.83	\$80.22	-21%

Reimbursement Rate by Provider

Reimbursement rates vary among providers who bill for SUD services. In general, service providers with doctoral-level credentials are reimbursed for the same procedure code at a higher rate than those who have master’s degrees. The NH CHIS does not have complete data on service level providers, so analysis of the effect of credentials on rates is limited and should be seen as approximate. Table 4 lists New Hampshire providers, their reimbursement rates in the New Hampshire commercial market compared to Medicare rates for the same claims, and the percent of their claims volume submitted for services provided by clinicians with doctoral-level credentials. Note that Recovery First Physicians Group is the only practice reimbursed for their commercial patients at a level higher than the comparable Medicare

rates.³ Also of interest is that the reimbursement level for Lamora Psychological Associates is low relative to its high proportion of claims where the service provider has doctoral-level credentials.

**Table 4:
Provider Rate Comparison**

Provider	Provider Comparison to Medicare Mean	% Doctorate*
Recovery First Physicians Group	+139%	0%
The Counseling Center of Nashua, P.A.	+10%	29%
West Central Behavioral Health	+6%	80%
Dartmouth Hitchcock Psychiatric Associates	+3%	2%
The Mental Health Center of Greater Manchester	-2%	16%
Keystone Hall	-3%	0%
Center for Life Management	-6%	0%
Genesis Behavioral Health	-6%	0%
Northern Human Services	-8%	0%
Frisbie Memorial Department Primary Care	-11%	67%
Merrimack Valley Counseling Association	-13%	0%
Lamora Psychological Associates, P.A.	-15%	100%
BFT	-18%	0%
Exeter Counseling Center, PLLC	-18%	0%
Monadnock Family Services	-19%	0%
Concord Hospital Medical Associates	-21%	0%
Friendship House Retreat Center	-22%	0%
Mydiscover Incorporated	-25%	0%
Chestnut Hill Counseling Associates	-25%	0%
Salem Psychological Associates, P.A.	-27%	0%
Greater Nashua Mental Health Center at Community Council	-28%	36%
Pastoral Counseling Services – United Church of Christ, Inc.	-29%	0%
Child and Family Services of New Hampshire	-32%	0%
Foundation Medical Partners, Inc.	-34%	2%
Exeter Psychological Associates, Inc.	-35%	0%

*Credentials of specific service provider cannot be determined for all claims due to provider submission and carrier processing practices.

Reimbursement Rate, National Context

Generally, across the country, commercial carrier reimbursement rates appear to be higher than those paid through Medicare and through Medicaid programs. For example, SAMHSA found that, nationally,

³ Unusual comparisons might result from an anomaly in the NH CHIS. Clear outlier values were removed prior to this analysis; some values remained that did not meet the criteria for outlier but were still unusual. Further research is warranted before drawing conclusions about individual providers.

commercial rates for SBIRT services, an evidence-based program for Screening, Brief Intervention, and Referral to Treatment for SUDs, are 14 percent higher than rates paid through Medicare, and 32 percent higher when compared to an average of national Medicaid reimbursement rates.⁴ However, in New Hampshire, commercial rates for SUD services appear to be closer to or below average Medicaid payment rates. For example, code 90834, the most commonly used SUD service code for the commercial NH population, has a median commercial reimbursement of \$65.00 in New Hampshire. As seen in Appendix A, the NH Medicaid rate of \$65.00 matches the median NH commercial rate; that rate is below the rate in Medicaid fee schedules of about half of the states.

Note on exclusion of 90853 - Group Psychotherapy

Wide variation in payments for service code 90853, Group psychotherapy, suggests that services are not comparably defined across carriers. This code was not included in the analysis for this report.

**Table 5:
Carrier Rate Comparison for 90853 - Group Psychotherapy**

Carrier	# Claims	Mean	Minimum	Maximum
Aetna	105	\$245	\$0	\$450
CIGNA	118	\$151	\$0	\$428
Harvard Pilgrim	208	\$65	\$0	\$400
United	50	\$48	\$39	\$400
Anthem	651	\$27	\$0	\$58
Other	49	\$24	\$0	\$40

Acknowledgements

Prepared for the New Hampshire Insurance Department by Compass Health Analytics, Inc. Comments or questions should be submitted to Tyler Brannen at the New Hampshire Insurance Department, tyler.brannen@ins.nh.gov.

⁴ SAMHSA: Coding for Screening and Brief Intervention Reimbursement. Last updated 4 June 2015; accessed 19 May 2016: <http://www.samhsa.gov/sbirt/coding-reimbursement>.

Appendix A:
State Medicaid Rates for 90834 Psychotherapy with patient and/or family, 45 minutes

Note: Data in the following table were gathered by searching online fee schedules for each state Medicaid agency. In many cases, states reimburse code 90834 at different levels based on provider credential. In each case, the lowest state rate for office-based services was selected. Some states do not make fee schedules available or fees are set by multiple managed care organizations within the state.

State	Rate	Website
MI	\$35.37	http://www.michigan.gov/documents/mdhhs/Non-Physician_BH-012016_514585_7.pdf
NJ	\$36.04	https://www.njmms.com/downloadDocuments/CPTHCPSCODES.pdf
PA	\$39.00	http://www.dhs.pa.gov/publications/forproviders/schedules/outpatientfeeschedule/index.htm
ME	\$41.25	https://mainecare.maine.gov/Provider%20Fee%20Schedules/Rate%20Setting/Section%20065%20-%20Behavioral%20Health%20Services/Section%2065%20-%20Behavioral%20Health%20Services%202016.pdf
KY	\$44.03	http://chfs.ky.gov/NR/rdonlyres/63561642-4335-45FB-9F06-FE3E75A9E101/0/CopyofBHandSUFeeScheduleOPNFrev612016.pdf
WA	\$44.17	http://www.hca.wa.gov/medicaid/rbrvs/pages/index.aspx
IL	\$44.20	https://www.illinois.gov/hfs/MedicalProviders/MedicaidReimbursement/FeeSchedule/Pages/default.aspx
WI	\$44.44	https://www.forwardhealth.wi.gov/WIPortal/Subsystem/Publications/MaxFeeResults.aspx?UBID=1
FL	\$46.02	http://portal.flmmis.com/flpublic/Provider_ProviderServices/Provider_ProviderSupport/Provider_ProviderSupport_FeeSchedules/tabid/51/desktopdefault/+Default.aspx
AZ	\$48.60	https://www.azahcccs.gov/PlansProviders/RatesAndBilling/FFS/BehavioralHealthrates.html
RI	\$48.92	http://www.eohhs.ri.gov/Portals/0/Uploads/Documents/Fee%20Schedules/Medicaid%20Fee%20Schedule.pdf
NY	\$49.46	https://www.emedny.org/ProviderManuals/ClinicalPsych/PDFS/Clinical_Psychology_Fee_Schedule.pdf
VA	\$50.09	http://www.magellanofvirginia.com/media/946002/va_medicaid_dmas_rates_7-1-2014.pdf
AL	\$51.00	http://medicaid.alabama.gov/documents/6.0_Providers/6.6_Fee_Schedules/6.6_Rehab_Option_Fee_Sched_SA_Updated_3-3-15.pdf
LA	\$56.16	http://www.lamedicaid.com/provweb1/fee_schedules/ProfServ_FS.htm
MD	\$57.61	http://dhmh.maryland.gov/mha/Documents/PMHS_Reimbursement_Schedule.pdf
MT	\$58.53	http://medicaidprovider.mt.gov/enduserbrvs
MO	\$60.00	https://dssapp3.dss.mo.gov/FeeSchedules/fsmain.aspx
WV	\$61.69	http://www.dhhr.wv.gov/bms/FEES/Pages/WV-Medicaid-Physician's-RBRVS-Fee-Schedules.aspx
SD	\$61.69	https://dss.sd.gov/docs/medicaid/providers/feeschedules/IndMentalHealth_1.1.16.pdf
CT	\$63.12	https://www.ctdssmap.com/CTPortal/Provider/ProviderFeeScheduleDownload/tabid/54/Default.aspx
NH	\$65.00	https://nhmmis.nh.gov/portals/wps/wcm/connect/20c3b980495c3ffa9965ffcf70291108/20160212-ADH-REH-101.pdf?MOD=AJPERES
OH	\$65.46	http://medicaid.ohio.gov/Portals/0/Providers/FeeScheduleRates/ODADAS%20rates.pdf
CA	\$67.16	http://files.medi-cal.ca.gov/pubsdoco/Rates/rates_range_display.asp
IN	\$67.18	http://provider.indianamedicaid.com/ihcp/Publications/MaxFee/fee_home.asp

State	Rate	Website
VT	\$67.73	http://dvha.vermont.gov/for-providers/2016-fee-schedule-1/
GA	\$68.44	https://www.mmis.georgia.gov/portal/PubAccessProviderInformation/FeeSchedules/tabid/56/BMLUsed/20160127/Default.aspx
TX	\$68.49	http://public.tmhp.com/FeeSchedules/StaticFeeSchedule/FeeSchedules.aspx
WY	\$68.54	http://wyequalitycare.acs-inc.com/fees/Fee_Schedule/index.asp
CO	\$68.87	https://www.colorado.gov/pacific/hcpf/provider-rates-fee-schedule
IA	\$69.82	https://dhs.iowa.gov/sites/default/files/Mental_Health_SubstanceAbuseFees_and_Rates.pdf
NE	\$71.84	http://dhhs.ne.gov/Documents/471-000-532.pdf
OK	\$71.84	http://www.okhca.org/providers.aspx?id=102&menu=60&parts=7773
NM	\$71.95	http://www.hsd.state.nm.us/uploads/FileLinks/e7cfb008157f422597ccdc11d2034f0/Behavioral_Health__Fee_Schedule_Effective_8_1_2014_corrected.pdf
MA	\$72.73	http://www.mass.gov/eohhs/docs/eohhs/eohhs-regs/101-cmr-306.pdf
NV	\$73.92	http://dhcfnv.gov/uploadedFiles/dhcfpnhgov/content/Resources/Rates/PT14BehavioralHealthOutpatientTreatment-04012016(1).pdf
MS	\$74.16	https://medicaid.ms.gov/wp-content/uploads/2014/03/MentalHealthPsychiatry.pdf
ID	\$74.30	http://healthandwelfare.idaho.gov/Providers/MedicaidProviders/MedicaidFeeSchedule/tabid/268/default.aspx
SC	\$74.60	https://www.scdhhs.gov/sites/default/files/RBHS-LEA%20Provider%20Rates%20eff%2001-01-2016%20web.pdf
MN	\$75.70	http://www.dhs.state.mn.us/main/idcplg?IdcService=GET_FILE&RevisionSelectionMethod=LatestReleased&Rendition=Primary&allowInterrupt=1&noSaveAs=1&dDocName=dhs_id_017675
AR	\$83.42	https://www.medicaid.state.ar.us/Download/provider/docs/fees/NURSEPRA-fees.pdf
DE	\$84.95	https://www.dmap.state.de.us/downloads/hcpcs/2016.fee.schedule.pdf
UT	\$97.06	http://health.utah.gov/medicaid/stplan/lookup/FeeScheduleDownload.php
OR	\$98.11	http://www.oregon.gov/oha/healthplan/pages/feeschedule.aspx
AK	\$126.50	http://manuals.medicaidalaska.com/docs/dnld/Fees_Physician_SFY2014.pdf
NC	#N/A	https://dma.ncdhhs.gov/providers/programs-services/mental-health/Behavioral-Health-Services
ND	#N/A	https://www.nd.gov/dhs/services/medicalserv/medicaid/docs/fee-schedules/2015-ambulatory-behavior-health.pdf
KS	#N/A	https://www.kmap-state-ks.us/Provider/Pricing/ScheduleList.asp
TN	#N/A	https://www.tn.gov/tenncare/topic/providers-managed-care-organizations