

July 25, 2018

Via electronic submission

PUBLIC COMMENT LETTER

Susan M. Tanksley, PhD
Biochemistry and Genetics Branch Manager
Laboratory Services Section MC 1947
Texas Department of State Health Services
PO Box 149347
Austin, TX 78714-9347

Re: Rider 37 Report – Proposed Models

Dear Susan,

On behalf of our more than 465 member hospitals and health systems, including rural, urban, children's, teaching and specialty hospitals, the Texas Hospital Association appreciates the opportunity to provide comments on the above-referenced matter. THA has long been an active supporter of ensuring all newborns are timely screened for the life-threatening and life-altering conditions that comprise the uniform screening panel.

THA is grateful to have participated in the ongoing stakeholder meetings, and for the opportunity to comment on the materials you presented at the July 12, 2018 Rider 37 Stakeholder Meeting. Those materials were distributed to THA's membership for review. We appreciate all the work you undertook to study current requirements and processes to establish and update newborn screening payment rates, gain an understanding of potential billing issues faced by Texas providers and facilities, compare similar programs in other states, and identify approaches to update reimbursement rates.

We support DSHS's efforts to ensure that newborn screening kits are fully reimbursed by insurers, thus alleviating that burden on providers and facilities. Standardizing billing codes would be very helpful in that regard, as would ensuring that reimbursements accurately reflect the cost involved with administering newborn screenings. These efforts should help the goal of screening every newborn in Texas. We respectfully oppose payment models that shift additional cost burdens to hospitals. We also understand that the cost of newborn screening kits is slated for an increase, but believe that any increase should not be pursued until reimbursement rates can be synchronized to adequately prevent a payment shortfall for providers and facilities.

THA is committed to continuing our work with you to screen all newborns, and we thank you for your consideration of these comments. Should you have any questions, please do not hesitate to contact me at clopez@tha.org or 512-465-1027.

Respectfully submitted,



Cesar J. Lopez
Associate General Counsel
Texas Hospital Association