

Comments and Responses on ARC 4673C  
Uniform PA Process  
Received 10/16/19

The following person/organization provided written comments, which are included in the summary below:

1. Erika Eckley, VP Government Relations and Assistant General Counsel, Iowa Hospital Association
2. Bill Dodds, President, Optima Lifeservices

**Comment topic #1:**

Two respondents supported the uniform prior authorization process, but feel the proposed rule is overly broad and not specific enough.

One respondent suggested that Iowa look to Texas and Vermont as examples of uniform prior authorization forms.

**Response:** The legislation was purposefully broad and not specific in order to allow this project flexibility. DHS and the Managed Care Organizations (MCOs) have been meeting regularly to create forms that will meet the needs of all Medicaid payers. DHS takes the comments under advisement, but will not revise the proposed rule based upon these comments.

**Comment topic #2:**

One respondent asked that DHS undertake a review and standardization of utilization management criteria across Medicaid payers.

**Response:** This comment is outside the scope of the legislation and this proposed rule. DHS takes the comment under advisement, but will not revise the proposed rule based upon this comment.

**Comment topic #3:**

One respondent supports another piece of legislation, not addressed in this rules package, requiring DHS to investigate the costs associated with expanding the state's MMIS for use as a single portal for PA submissions.

**Response:** This comment is outside the scope of the legislation and this proposed rule. DHS takes the comment under advisement, but will not revise the proposed rule based upon this comment.

**Comment topic #4:**

One respondent suggests that the 1915(i) Habilitation program be administered in the same way as the 1915(c) Intellectual Disability Waiver, particularly in relation to authorization periods.

Response: This comment is outside the scope of the legislation and this proposed rule. DHS takes the comment under advisement, but will not revise the proposed rule based upon this comment.