

# **OHIO HEALTH CARE ASSOCIATION REIMBURSEMENT COMMITTEE**

**April 16, 2025, 10:00 a.m.  
Zoom Meeting**

## **M I N U T E S**

Chair Denise Leonard called the meeting to order. The table at the end of these minutes shows attendance.

The Chair reminded the committee of the OHCA Antitrust Compliance, Conflict of Interest, and Confidentiality Policies linked to the agenda. They were particularly important because of the legislative items discussed in the meeting.

Motion: To approve the minutes of the previous meeting.  
Seconded; motion carried.

Debbie Jenkins discussed the state budget. The Governor's budget was covered previously. The week before the committee meeting, the House passed its version. The comp doc linked to the agenda was helpful in tracking issues. The bill still had to go through the Senate and conference committee to be finalized.

Regarding SNF reimbursement, we were still waiting on a decision in the mandamus case, so it was challenging to propose changes to the quality incentive. As a result, our focus areas were PDPM, private rooms, and capital.

On PDPM, the House didn't change the as-introduced version, which called for using only the nursing component, a transition with a freeze followed by a 1/3-2/3 division between PDPM and RUGs and 100% PDPM on January 1, 2027. We had different thoughts on these issues, including a blend of PDPM components and a stop loss/stop gain for the phase-in. We originally advocated for a hold harmless, which had a small cost. Because the House wasn't interested in additional spending, we shifted to a budget-neutral transition approach the week between the House sub bill and final passage, but it didn't get in.

There also were technical issues with the language in HB 96 that we included in our amendment. We would need to address those issues in the Senate. One was a conversion factor so the state didn't take money out of the system just because of the transition. The other was the reference to freezing June 30 case-mix scores, which was wrong because of correction period and because many providers who froze their CMIs weren't doing RUGs assessments. These technical issues really needed to be resolved. We also would continue to push for the other changes, especially

the phase-in, which raised concerns providers would lose \$20 or more a day starting January 1, 2026.

Under both proposals, PDPM would begin January 1, using data starting April 1, 2025. It was important to do the PDPM assessments and capture all the criteria for Medicaid. We published an article by Tammy Cassidy in News Bites listing the key elements. Ms. Jenkins suggested committee members make sure their MDS nurses knew about this situation. PDPM was different because of therapies – no proposal was using them. Providers should focus highly on nursing.

Regarding private rooms, we initially tried in the House to address a potential concern with the spending cap of \$160 million per year set in the last budget. Current law assumed 50% Medicaid utilization to limit the number of rooms that could be approved. There was still space for more rooms as of the last count. We were concerned that utilization could end up being higher, so we had conversations in the House about taking off the cap to allow growth and continued payments. We thought we had explained the issue, but the sub bill came out with a cap of 5,000 private rooms even though 28,000 had been approved. We heard legislators were told only 4,800 Medicaid residents were in private rooms and thought they were giving some more space but limiting the state's liability. We tried to explain that not every day is a Medicaid day. There was still some misunderstanding and little time. The House ended up passing a 15,000-room cap. They didn't seem to understand the rooms could be used by non-Medicaid patients. The cap passed by the House would not work, so we were having conversations with the Senate about it.

For capital, we proposed to take the biennium to stand up a fair rental value system using appraisals, but it wasn't put in.

Pam Skrzynski asked if the requirement for a policy on selecting residents for private rooms was still in place.

Ms. Jenkins said the REIT language in the Governor's budget was surprising. It prohibited new leases from REITs under ODH. Erin Hart did research and found a lot of REIT-owned facilities. The House struck the language prohibiting ODH from granting licenses for new leases, which was good news. We would advocate to keep this win in the Senate.

Joe Abraham said reducing the number of private rooms would create a problem with moving residents around, which would lead to complaints. He felt legislators didn't understand the difficulties with room changes.

Ms. Jenkins said for assisted living reimbursement, we proposed an amendment for modest rate increases and retention payments, which were the HCBS version of bed-hold days. Unfortunately, these proposals were not adopted because of concerns about funding increases. We argued that providers needed further rate increases so they could raise wages to encourage staff members to stay. Without the ability to raise wages, we could end up back where we were before the last budget. We would continue advocacy in the Senate. Maybe we could get a smaller increase. We

didn't want to get back to stagnant rates and providers not taking waiver residents. Also, we were concerned that providers would not build capacity if the rates didn't go up.

We also had a proposal for credentialing and training direct care staff to help them stay longer. We tried one amount in the House and then a lower amount, but didn't get that amendment either. We would see if the Senate would do anything with credentialing. The House addressed it for child care workers.

On the PNA, the Governor proposed going to \$100. The House reduced it to \$75, but it was still an increase.

Pete Van Runkle discussed federal issues, including the budget reconciliation process and the potential cuts to Medicaid. The week before the committee meeting, the House adopted a budget resolution previously passed by the Senate. It broke precedent by establishing separate budget targets for House committees and Senate committees. The House Energy and Commerce Committee still had a target of \$880 billion in savings, which mostly would have to come from Medicaid, while the Senate spending reduction targets were much smaller. All of the hard decisions were delayed to the reconciliation process, when Congress would have to come up with a single bill. Congress, like the General Assembly, was on a two-week break at the time of the committee meeting. Reconciliation would begin in the House after they returned. The Speaker's target for House action was Memorial Day, although many commenters questioned whether they would meet that date. A number of House members disagreed with Medicaid cuts and other items but had voted for the resolution to move the process along.

Mr. Van Runkle mentioned the recent ruling against the minimum staffing rule in Texas and the ongoing legislative efforts to repeal the staffing mandate. The court decision did not impact the facility assessment or payment transparency requirements in the staffing rule, only the staffing standards. Mr. Abraham asked why the facility assessment wasn't included.

Ms. Hart reviewed CMS's proposed SNF Medicare payment rule for fiscal year 2026. It provided for a net increase of 2.8%, which was less than the consumer price index for 2024. She highlighted the ICD-10 code mapping changes, which usually just change category assignments. This time, CMS was proposing to establish a number of diagnosis codes, including diabetes, hypoglycemia, obesity, and various eating disorders, that would generate return-to-provider errors. Committee members should share this information with their MDS nurses to review past claims for potential impact and for possible coding changes in the future. CMS also proposed to eliminate the pending health equity adjustment for VBP. We were reviewing proposed changes to QRP. Ms. Hart encouraged committee members to submit suggestions.

Diane Dietz said AHCA/NCAL recently announced that CMS would extend the deadline for the off-cycle revalidations to August 1. She pointed to revised subregulatory guidance clarifying that dietary workers, among others, were not included in the definition of additional disclosable parties. Even with the extension, providers should continue working on their

revalidation submissions. AHCA/NCAL continued to advocate for additional changes to the requirements, although many of them would require Congressional action.

Regarding Medicaid recoupments, Ms. Hart said ODM overpaid many providers in December 2023 due to a processing error. ODM recently issued a communication stating that providers would receive a report on how much they owed. As of the committee meeting, no one said they had received the initial communication or the report. ODM said the provider contact listed in PNM enrollment would receive the communication. Mr. Abraham asked if the contact could be changed.

Ms. Hart said in March, Medicaid began initiating recoupments without the promised advance notification. OHCA requested a reversal, which resulted in a supplemental payment. Providers were struggling to post these payments, as the remittance advice reports did not match. Members of the Billing Committee obtained corrected remittance advice reports by emailing the help desk, although it took several weeks. We expected a communication to go out to providers the week of the committee meeting on some outstanding issues, including the recoupment reports.

Ms. Hart said some providers continued to receive contract/specialty code denials for fee-for-service claims for the private room add-on. Emailing ODM was the only way to correct this issue. On managed care private room payments, Buckeye developed a manual workaround for their issue. CareSource was reprocessing the January and February claims that had duplicate patient liability deductions. They were still researching December 2024 claim denials. AmeriHealth Caritas corrected their system error and reprocessed all impacted claims by April 11. Aetna said they reconfigured their system to accept claims with private room add-ons the week before the committee meeting, but Billing Committee members submitted corrected claims after that date that were rejected. Ms. Hart encouraged providers to resubmit and report back issues.

Ms. Hart displayed the implementation schedule for Next Generation MyCare Ohio, which was set to start January 1, 2026. All four plans (Anthem, Buckeye, CareSource, and Molina) would go live in the current 29 MyCare counties January 1. The next group of counties would go live April 1, 2026. We requested each plan offer educational sessions to prepare members in the new areas for the transition.

Ms. Dietz discussed an issue relating to PASRR. In 2024, ODM changed the LOC rule to allow a hospital exemption to serve as a LOC for the first 30 days after admission. For that patient to be eligible for continued payment after the 30 days, the facility had to request a resident review and LOC determination by day 29. Reportedly, the number of hospital exemptions were increasing and LOC determinations were taking longer. Failure to complete a level 2 resident review within the 30-day time frame would result in non-payment until completion. ODM suggested SNFs initiate resident reviews immediately for residents with conditions that may trigger level 2 reviews.

Chair Leonard asked for any other business. There was none.

The meeting was adjourned.

Attendance:

First Name	Last Name	7/25/24	8/22/24	9/18/24	10/16/24	11/21/24	12/18/25	1/15/25	2/19/25	3/19/25	4/16/25
Joe	Abraham				P	P	P	P	P		P
Jacqueline	Altier					P					
Josh	Anderson	P	P	P	P	P		P			
Steve	Anderson	P	P	P	P	P				P	P
Edward	Beatrice	P	P	P	P	P	P		P	P	P
Kayla	Bell							P	P		
Donna	Bicker								P		
Jennifer	Bidka	P	P		P	P	P	P	P		P
Stephanie	Blakeman			P	P	P	P		P	P	P
Shlomo	Brisk		P	P	P		P			P	
Stephanie	Browning	P	P	P	P	P	P	P	P	P	P
Eric	Buls	P	P		P	P	P	P	P	P	P
Nancy	Burden						P	P	P	P	
Tim	Cahill										
Jennifer	Campbell	P		P	P	P	P	P	P	P	P
Nathan	Carder	P	P			P				P	P
Bruce	Carpenter			P				P	P	P	P
Steven	Carrico	P	P	P	P	P		P	P	P	P
Jennifer	Cidila		P		P				P		
Brian	Coil							P			
Kimberly	Corrigan	P	P				P				
Gabrielle	Corwin		P	P	P	P	P	P			P
Russell	Corwin	P	P	P	P		P	P	P	P	P
Eli	Coury									P	
Scott	Cunningham	P		P	P	P	P	P	P	P	P
Tracie	D'Amato	P	P	P	P	P	P	P	P	P	P
Tammy	Davis		P	P	P	P			P		P
Tammi	DeSimone								P		
Diane	Dietz	P		P	P	P	P	P	P	P	P
Titus	Donnell				P						
Josh	Dorn							P		P	P
Mike	Driver	P	P								

Matthew	Duddy	P	P	P	P	P	P	P	P	P	P
David	Elmore	P	P		P	P	P	P	P	P	P
John	Fleischer	P	P	P			P	P	P		
Junior	Foster										
Austin	Gerber		P						P		
Michelle	Gill	P	P	P	P	P	P		P	P	P
Priscilla	Glidewell					P	P	P	P	P	P
Brad	Granger	P		P	P	P	P	P	P	P	P
Curtis	Green	P									
Nikita	Grimes						P		P		
Tiffany	Hall					P	P	P	P		
Moriel	Hamui						P				
Emily	Hand	P	P	P	P	P	P		P	P	P
Janet	Harris	P		P	P	P		P	P		P
Erin	Hart	P	P		P	P		P	P	P	P
Scott	Heichel			P			P			P	
Nick	Hicks	P	P	P	P	P	P	P	P	P	
Sarah Jane	Horvath								P		
Deb	Ifft	P	P	P	P	P	P	P	P	P	P
Nicole	Jablonski			P							P
Patty	Jackson										
Debbie	Jenkins	P	P	P	P				P	P	P
Elizabeth	Jones		P		P					P	P
Brian	Karpodinis	P	P				P	P	P		
Steve	Katona	P	P	P	P	P	P	P	P	P	
Ben	Kiss	P		P		P	P		P	P	
Chase	Kohn										
Boris	Kushnir		P	P	P	P		P	P	P	P
Tonya	Lambert					P	P	P			P
Liz	Lane	P	P	P		P	P	P	P	P	P
Paul	Lang		P	P	P	P		P	P		
Matt	Larsh								P	P	P
Tim	Lehman	P	P		P			P	P		
Denise	Leonard	P	P	P	P		P	P		P	P
Will	Levering			P	P	P	P		P	P	
William	Levering			P	P		P		P	P	P
Beth	Lind	P	P	P		P	P	P	P	P	
Tiffany	Lockhart	P		P	P	P	P				
Brian	Marrie			P	P	P	P	P			P
Heidi	Mays						P				
Eileen	McCain										
Heidi	McCoy				P			P	P		

Dianne	McFarland									P	
Steve	Meyer									P	
Emily	Miller				P						
Tracy	Mitchell	P	P	P	P	P	P	P		P	P
Angie	Moore	P	P				P		P		
Tammy	Moyer-Wilson		P								
Matt	Murray					P			P		
Bob	Nedrich	P	P	P	P	P	P	P	P	P	P
Jeanna	Neiheisel			P							
Rey	Nevarez			P		P				P	
Brian	Newman						P			P	P
Daniel	Newman	P				P					
Karen	Nofziger	P								P	
Barb	Notardonato-Cole	P	P			P	P		P		P
Rosemary	Orlando, CPA	P	P		P		P		P	P	P
Erin	Overla										P
Matthew	Pool										
Derrick	Ratliff	P			P	P				P	P
Paula	Reape	P	P		P	P		P	P	P	P
Auston	Reaser	P	P	P	P		P	P		P	P
Todd	Rice	P		P		P	P	P			
Jennifer	Richter	P									
Chanda	Robson	P	P	P		P	P	P	P	P	P
Dominic	Romeo								P	P	P
Rick	Russo										
Cheryl	Schermerhorn	P	P	P	P	P	P	P	P	P	P
Jane	Schoof	P	P				P				
Hemant	Shah	P				P			P	P	
Bob	Sharon										
Tony	Shaw	P	P			P	P	P	P	P	P
Dwayne	Shepherd	P		P	P			P	P		P
Dean	Shipman										
Mike	Shoffner	P	P	P		P	P	P		P	
Pauline	Siler	P	P	P	P			P	P	P	P
Jessica	Siu	P	P				P		P	P	
Pamela	Skrzynski						P	P	P		P
Jana	Smith	P	P	P	P	P	P	P	P	P	P
Adam	Swartz									P	
Sravani	Tallapaneni				P						
Cindy	Thomas					P			P		
Katie	Tira			P	P	P			P		
Gina	Toigo	P	P	P	P	P	P		P		P

Stephanie	Trainer	P	P	P	P	P	P	P	P	P	P
Julie	Uhler					P		P	P		P
Pete	Van Runkle	P	P	P	P	P	P	P	P	P	P
Megan	Wahl	P	P	P	P		P	P	P	P	P
Anastasia	Waltz							P		P	P
Jessi	Wells				P	P	P			P	
Matthew	Wine	P	P	P	P		P	P	P	P	P
Morgan	Wright	P	P	P		P	P	P	P	P	P
Valerie	Youell								P		P
Dave	Zabo	P	P								