

MARYLAND PSYCHIATRIC SOCIETY



OFFICERS 2019-2020

Marsden H. McGuire, M.D.
President

Mark J. Ehrenreich, M.D.
President-Elect

Virginia L. Ashley, M.D.
Secretary-Treasurer

Patrick T. Triplett, M.D.
Council Chairman

EXECUTIVE DIRECTOR

Heidi Bunes

COUNCIL

Jason H. Addison, M.D.
Theodora G. Balis, M.D.
Margo D. Lauterbach, M.D.
Jessica V. Merkel-Keller, M.D.
Paul Nestadt, M.D.
Erik Roskes, M.D.
Carolina Vidal, M.D., M.P.H.
Crystal C. Watkins, M.D., Ph.D.

EARLY CAREER

PSYCHIATRIST COUNCILOR

Marissa A. Flaherty, M.D.

RESIDENT-FELLOW

MEMBER COUNCILOR

Jamie Spitzer, M.D.

PAST PRESIDENTS

Jennifer T. Palmer, M.D.
Merle C. McCann, M.D.

APA ASSEMBLY

REPRESENTATIVES

Annette L. Hanson, M.D.
Elias K. Shaya, M.D.
Brian Zimnitzky, M.D.

MEDCHI DELEGATE

Elias K. Shaya, M.D.

VIA EMAIL to insuranceregreview.mia@maryland.gov

January 3, 2020

Ms. Lisa Larson
Regulations Manager
Maryland Insurance Administration
200 St. Paul Place, Suite 2700
Baltimore, MD 21202

Dear Ms. Larson:

The Maryland Psychiatric Society, which represents over 700 psychiatrists across the state, offers comments in response to the December 6 proposed change to **31.10.21 Private Review Agents**. We recommend the following revisions to the change that adds ASAM criteria to the uniform treatment plan form:

1. To improve clarity, the wording of the instructions for the low-medium-high ASAM grid should be changed from "...rate the patient's current status on these conditions..." to "...rate the patient's current severity/risk and current need for treatment services intensity on these Dimensions..."
2. In addition, after the grid, include free text space to "add details or explanation as needed" for each dimension.
3. In the interest of eliminating redundancies and reducing paperwork and provider burnout, we recommend adding a sentence to the "Current Symptoms and Functional Impairments" section on page 1 as follows:

"If this request is for Substance Use Disorder authorization, skip this section and complete the Substance Use related section on page 3 instead."

Thank you very much for this opportunity to give feedback on the proposed change to the uniform treatment plan form. We appreciate your consideration of our recommendations and would be glad to provide any additional information you may need. Please contact Heidi Bunes at heidi@mdpsych.org or 410-625-0232 if you have questions.

Sincerely,

Marsden H. McGuire, M.D., M.B.A.
President