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Department of Social Services
Legal Services Division – Rulemaking
P.O. Box 1527
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To Whom It May Concern:

On behalf of its 142 members, the Missouri Hospital Association submits the following comments on the proposed rule at 13 CSR 70-3.330 published in the *Missouri Register* on January 3, 2021.

CSR 70-3.330(1)(B) – Definitions.

“MHD participants, or MO HealthNet Participants” should be added to the list of defined terms and should include all participants whether their services are rendered through the fee-for-service program or through the managed care program.

CSR 70-3.330(1)(B)6 and 7 should be amended to clarify that “health care professionals” and “health care providers” include those that provide services to MO HealthNet managed care plan participants as well as those that provide services to MO HealthNet fee-for-service participants.

CSR 70-3.330(5)(A) – Reimbursement.

CSR 70-3.330(5)(A) should be amended to clarify that the principle of telehealth reimbursement parity required by statute applies to services delivered through the managed care program as well as services delivered through fee-for-service program.

Thank you for the opportunity to comment on the proposed amendment.

Sincerely,

Brian Kinkade
Vice President of Children’s Health and Medicaid Advocacy

bk/dd