



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

ELIZABETH HERTEL
DIRECTOR

May 30, 2024

TO: Interested Party

RE: Consultation Summary Project Number 2406-DMEPOS - Prior Authorization Changes to Enteral Formulas/Enteral Supplies

Thank you for your comment(s) to the Behavioral and Physical Health and Aging Services Administration relative to Project Number 2406-DMEPOS. Your comment(s) has been considered in the preparation of the final publication, a copy of which is attached for your information.

Responses to specific comments are addressed below.

Comment: The proposed policy states that the “ordering practitioner” will complete the written order. We are seeking clarification regarding who may complete the BPHASA-2401 form. Our clinic utilizes an electronic system for physicians/prescribers to enter the order, and the clinic dietician then calls the Prior Authorization Certification Evaluation Review (PACER) line to obtain the prior authorization (PA). Is it acceptable for the dietician or other nutritional support staff to complete the BPHASA-2401 form, send it along with the PA form, a copy of the physician-signed electronic order, and other supporting medical documentation to the medical supplier?

Response: It is acceptable for the ordering practitioner’s designated clinical staff such as a dietician or other appropriate clinical staff (e.g., registered nurse) to complete the BPHASA-2401 and send it along with the ordering practitioner’s order and other supporting medical documentation to the medical supplier. The medical supplier will complete the PA form (MSA-1653-B Special Services Prior Approval – Request/Authorization) and submit it along with the practitioner’s order, the BPHASA-2401, and other supporting medical documentation to the MDHHS Program Review Division (PRD). Note that it is not acceptable for the medical supplier to complete form BPHASA-2401 except for those fields as indicated on the form. The final policy and the BPHASA-2401 form were revised to reflect that the ordering practitioner’s designated clinical staff (e.g., dietician, registered nurse, or other appropriate hospital staff) may complete the BPHASA-2401.

Comment: Physicians will not be happy that they will be required to complete the MSA-1653-B form in addition to all the other medical documentation.

Response: The MSA-1653-B (Special Services Prior Approval – Request/Authorization form) is not completed by the ordering practitioner. The medical supplier completes and submits the MSA-1653-B to PRD, or the medical supplier may submit the prior authorization request in the Community Health Automated Medicaid Processing System (CHAMPS) PA subsystem and upload the required documents (practitioner order, BPHASA-2401, and other supporting documentation). Please refer to the previous response regarding form BPHASA-2401.

Thank you for your inquiry. We trust that our responses addressed the concerns and questions noted. If you wish to comment further, send your comments to Lisa Trumbell at trumbell@michigan.gov.

Sincerely,

A handwritten signature in black ink that reads "Meghan Groen". The signature is written in a cursive, flowing style.

Meghan Groen, Director
Behavioral and Physical Health and Aging Services Administration