UNBUNDLING REIMBURSEMENT FOR

A CASE STUDY OF GEORGIA MEDICAID'S EXPERIENCE

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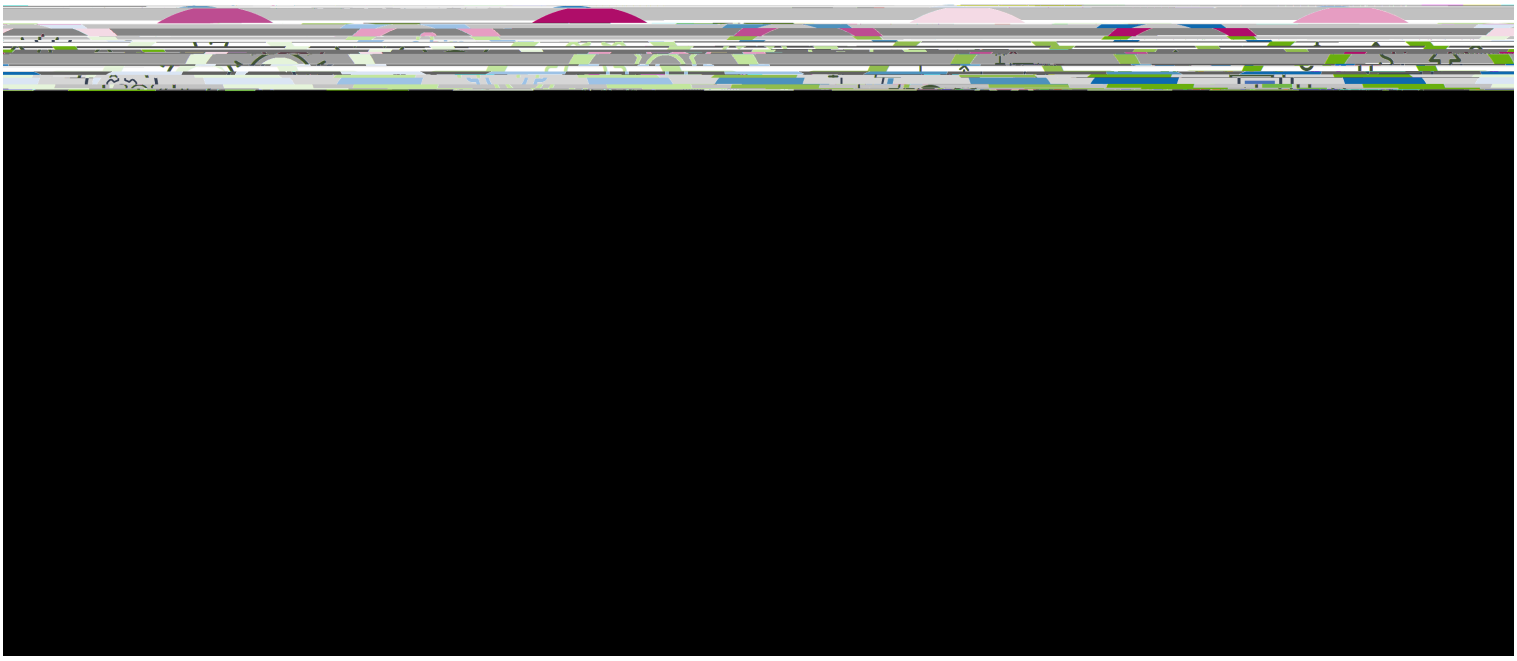
$_; r†urov; o= |_bv 1-v; v|†7‹ bv |o 7o1†l;m| |_; ;ou]b- ;7b1-b7
†m0†m7tbm] tom]J-1žm]7 u;ˆ;uvb0t; 1om|u-1;ržom P ! Q 7;ˆb1;v
ruovr;1žˆ; r-‹l;m| v‹v|;l P "Q =ou u;bl0†uv;l;m| bm ;7;u-tt‹ †-tb
P vQ -m7 !†u-t ;-t|_ tbThis analysis is intended for policymakers and stakeholders
in other states pursuing Medicaid reimbursement strategies with the overall goal of improving
‰ol;m=v ;t†b|-0t; -11;vv |o _b]_Jt†-tb|‹ 1om|u-1;ržom -1uovv _;-t
FQHCs. The hypothesis was that unbundling reimbursement of LARC devices from the Medicaid
" u;bl0†uv;l;m| u-|; ‰o†t7 bm1u;-v; ! -ˆ-bt-0btb|‹ -m7 †žtbŒ-ž
case study only considers the policy change's impact on Medicaid fee-for-service (FFS) because the
! †m0†m7tbm] u;bl0†uv;l;m| rotb1‹ omt‹ -rrtb;v |o ;7b1-b7 P "
bm=oul-žom]-|_;u;7 om ;7b1-b7 -m-];7 -u; |o ;m-0t; v|-h;_ot7;u
rotb1b;v bm |_; ;7b1-b7 -m-];7 -u; v;®m]:

Medicaid accounts for 75% of federal expenditures for family planning services.[i] The Centers for
bv;-v; om|uot -m7 u;ˆ;mžom P Q u;1oll;m7v |_-| ‰ol;m 0; ruoˆ
1o†mv;tbm] -m7 v;uˆb1;v u;t-|;7 |o |_; =ttt u-m]; o= 1om|u-1;ržˆ;
o[;m =-1; 0-uub;uv bm -11;vvbm] _b]_Jt†-tb|‹7 1olru;_;mvbˆ; 1o†m
higher-cost methods such as LARCs. Reimbursement policies for LARC methods and services are
1olrt;Š7 r-už1††-ut‹ †m7;u ;7b1-b77 -m7 o[;m 7o mo| -11o†m| =o
reimbursement for LARC devices and services from bundled payment systems so that the state can
ruoˆb7; -7;t†-|; u;bl0†uv;l;m| l-‹ bm1u;-v; |_; tbh;tb_oo7 |_-| v-=;
will purchase and provide these methods to more women. Removing reimbursement barriers to
0o|_ bmv;užom -m7 u;loˆ-t o= ! 7;ˆb1;v bv - h;‹ 1olrom;m| o= |_
|_-| ruoˆb7;u bm1;mžˆ;v -u; -tb]m;7 ‰b|_ ‰ol;m=v -†|omol‹ -m7 1_
m '••–7 u;v;-u1_ 1om7†1|;7 0‹ ;7b1bm;v'u• -m7)-Šl-m "|u-|;]b;v
LARC reimbursement from the PPS encounter rate as a key enabler to LARC access in FQHCs as
demonstrated in Figure 1.[ii] ou lou; 0-1h]uo†m7 bm=oul-žom om |_bv u;bl0†u
see m_-m1bm] om]J 1žm] !;ˆ;uvb0t; om|u-1;ržom P ! Q &r|-h; -m7
†-tbC;7 ;-t|_ ;m|;uv9 $oothb| =ou "|-|;v:

Figure 1: Example Reimbursement Comparison:
FQHC PPS Encounter Rate vs. LARC Costs Unbundled from PPS Encounter Rate*

Figure 2: Case Study Aims and Methods



ˆ;u |_; 1o†uv; o= ‘•‘•7 |_; ;7b1bm;v’u• -m7 ;-t|_ -m-];l;m| vvo1b-
‰b|_ ;ou]b- v|-h;_ot7;uv bm1t†7bm] |_; ;-t|_‹ o|_;uv7 ;-t|_‹ -0b;
-lbt‹ t-mmbm] "‹v|;l7 -m7 |_; ;ou]b- ;r-u|l;m| o= oll†mb|‹ ;-t|_ P
=uol _;-t|_ 1-u; ruoˆb7;u7 u;v;-u1_;u7 -m7 rotb1‹l-h;u bm|;uˆb;‰v7
COVID-19 pandemic limited the research team’s ability to schedule and complete some key informant
bm|;uˆb;‰v -m7 |_; rt-mm;7 r-ž;m| =o1†v]uo†rv8 _o‰;ˆ;u7 7;vrb|; |
-0t; |o]-|_;u - v†0v|-mž-t -lo†m| o= t†-mž|-žˆ; -m7 t†-tb|-žˆ; 7-|- |o

[v] Unintended or closely

vr-1;7 ru;]m-m1b;v 1-m _-^; m;]-ž^; _;-t|_ -m7 ;1omolb1 1omv;t†;m1
;ou]b- u-mhv “• o†| o= ”• bm |_; =v to‰ Approximately 80 percent of[vi] o†u;v:
†mrt-mm;7 0bu|_v bm ;ou]b- ‰;u; r†0tb1t‹ =†m7;77 1[vii] This suggests b|_ u
|_-| ;ou]b- _-v t;vv -11;vv |o 1olru;_;mvb^;7 r-ž;m|J1;m|;u;7 1om|u-

11;vv |o ! v bv -m blrou|-m| r-u| o= 1olru;_;mvb^; -m7 r-ž;m|J1;m
broader measures to support women’s health and economic well-being. The following summary details the two LARC reimbursement policies that Georgia’s Medicaid program passed to improve LARC access -m7 †žtbŒ-žom:

Post-Partum LARC Reimbursement Policy Change

In preparing this case study, [viii] (See Appendix vQ -

- Implem;m|-žom uo1;vž9t blrt;l;m|-žom 1_-tt;m];v 1om|ub0†|;7 |o ;Šr;1|;7 blr-1| o= |_; rotb1‹ 1_-m];7 bm1t†7bm]9 •Q t-1h o= 1o _ovrb|-t 7;r-u|l;m|v7 -m7 ‘Q 1om=†vbom o^;u _ovrb|-t 0bttbm] b claims system edits/denials.
- ov| @;1ž^;m;vv9

arrangements with FQHCs.

While the Georgia Medicaid claims data does support the hypothesis that the unbundling policy
1 o m | u b 0 † | ; 7 | o - m b m 1 u ; - v ; b m ! † ž t b Œ - ž o m 7 b | b v r o v v b 0 t ; | _ - |
b l r t ; l ; m | - ž o m r u o 1 ; v v 0 t † m | ; 7 | _ ; = † t t ; @ ; 1 | v σ ± ; l ‖ ; _ ‰ - ž o m b 1 u ‹ ; t " | ; ˆ 7 u - t h
challenges may have impacted Georgia's outcomes during the study period and provide important
t ; v v o m v o | = ¤ u | ├ ; v 1 o m v b 7 ; u b m] | _ ; 0 ; v | - r r u o - 1 _ | o b l r t ; l ; m | - ž o m 9
o t b 1 ‹ - l r b o m v - m 7 " | - h ; _ ¤] t - 7] ; u ; m 9 The lead supporters for the LARC reimbursement
u ; σ ± u l ‰ ; u | ; | _ ; 0 v | ; | u b 1 v - m 7 ‹ m ; 1 o t o] ‹

considered in policy changes to address equitable access to care. FQHCs/RHCs care for Medicaid

1. convb7;ubm] - lou; =;-vb0t; 0bttbm] l;|_o7oto]‹ |o ;-v; -7lbmbv|u r-‹;uv7
2. |;vžm] 1t-blv =ou 0o|_ 0bttbm] v‹v|;l -m7 1t-blv v‹v|;l 1olr-ž0bt stakeholders.

'': 0†bt7bm] |_; 1-r-1b|‹ o= _;-t|_ 1;m|;u t;-7;uv_br |o lo0btbŒ; v| rotb1b;v -u; ‰;ttJ†m7;uv|oo7 -m7 blrt;l;m|;7 1omvbv|;m|t‹ =uol P ! bmv;užom -m7 u;lo^-tQ -m7 -7lbmbv|u-ž^; r;uvr;1ž^; Pv|o1

;ou]b- -m7 ! " ;7b1-b7 -|-

The Georgia ;7b1-b7 ruo]u-l=v F! ! †m0†m7tbm] rotb1‹ ‰-v -rruo through a State Plan Amendment (SPA). Medicaid FFS data shows that the share of services provided in FQHC/RHCs that were LARC encounters increased through 2018 and decreased in 2019. Of the total m†l0;u o=)ol;m o= !;ruo7†1ž^;]; P)! Q bm ;ou]b-=v ;7b1-b77 " r |o|-t ;7b1-b7 ror†t-žom7 ‰b|_ ;7b1-b7 -m-];7 -u; 1o^;ubm] v”w o= |

Table B.1 FQHC and RHC Services - FFS

+;-u	†l0;u o=)! om ;7b1-b7 1uovv -tt -|;]oub;v o= b7 ‰ u;1;b^;7 -m‹ v;u^b1;v -| ! -| -m‹ robm| bm |_; ‹;-u	$o|-t m†l0;u o= =-lbt‹ w_ -m]-t-mmbm] v;u^b1;vw=ou-m]; 0btt;7 bm vF! v	w o= " v;u^b1;v =ou ! 0btt;7 -| F! v
2012	v7–‘v		•’		0.1%
2013	–7•u’	1.51%	55	’‘’:•w	•:uw
2014	••7‘“”	•’:•“w	87	58.2%	0.8%
2015	–7u–•	J”:’”w	119	’u:vw	1.2%
2016	–7uv–	-0.08%	•“•	‘’:”w	1.5%
2017	u7v“‘	J‘–:’vw	••’	J‘’:•w	1.7%
2018	u7u•”	J’:“uw	110	-2.7%	1.7%
2019	u7“•‘	J’:••w	•’	J’’:uw	1.1%

$b|t; * -lbt‹ t-mmmb-m]!;mou| J ;ou]b- -|- P‘••‘J‘••–Q

Title X FamilyPlanning AnnualR;rou| 7-|- v_o‰v |_-| bm ;ou]b-7 |_; |o|-t m†l0;u
bm $b|t; * vb|;v bm1u;-v;7 oˆ;u žl;7 ‰b|_ - v†0v|-mž-t f†lr bm ‘••u =
The Family Health Centers of Georgia from Georgia's Department of Public Health.

Table B.2: Title X LARC Use	
+;-u	ro= ! †v;uv -| ;Šb| =uol |_; ;m1o†m|;u
2012	v7‘•’
2013	v7•••
2014	u7•••
2015	“7•••
2016	••7‘u•
2017	v7u••
2018	–7••‘
2019	–7–•“

Source:_,rv+DD=r-u8or-8__v8]oˆD †0rb1D!;rou|v m7 oulv

! ! !(ƒ &$

1. To the ;Š|;m| |_-| |_; ! v ‰;u; r†u1_-v;7 †m7;u |_; ’“• u†] ub1
   l†v| 0btt |_; -1|†-t -1t†bvbžom 1ov| =ou |_; 7;ˆb1;:
2. !;bl0†uv;l;m| v_-tt 0; l-7; -| |_; =v -1|†-t ’“• -1t†bvbžom 1o

"r;1bC1 bmlzmb7bm] !;tmb|v;l;

$o b7=mz;l0;uv u;1;b^bm] -lbt‹ t-mmbm] v;u^b1;v =ou om] 1žm] !;´
bm -m7 ! P " ”“•7 ”“• _ ”“‘Q7 -tt o= |_; =otto‰bm] 1ub|;ub- l†

" ”“• _ ”“‘9

• $_; u;m7;ubm] ruo^b7;u " ;t†-tv |o ”“• _ ”“‘