

DHS Responses to Public Comments Regarding Hospital Reimbursement for Long Acting Reversible Contraceptives

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Comment: The Arkansas Academy of Physician Assistants (ARAPA), on behalf of over 150 Physician Assistants (PAs) throughout Arkansas, appreciates the opportunity to provide comments on amendments associated with Arkansas Regulation 10427: Long Acting Reversible Contraceptives (LARCs). By including PAs in the updated sections, we will further encourage PAs to practice to their full extent and ensure that we are not excluding PAs from important rules or amendments pertaining to medical care.

The updates to Long Acting Reversible Contraceptives (LARCs) gives appropriate information to providers surrounding Medicaid provider manuals and State Plan regarding the rules required to claim reimbursement. However, as of this year, PAs have now been designated both rendering and billing providers by Arkansas Medicaid as per Act 303 (2023) and therefore should be incorporated in further updates.

We would like to draw your attention to section II, Nurse Practitioner, Titled “214.330 Family Planning Coverage Information” and respectfully request the Department to have a section that would refer to PAs. Similar to the Nurse Practitioner Section but retitled to “Physician Assistant”.

By creating a section specific to PAs this would mimic the section as it is for “Nurse Practitioners” however, it would include specific language update within Section 214.330 C, to change the title from “Nurse Practitioners” to “Physician Assistants” and similarly in section D, update that to state “Physician Assistants”. Further in section D, this would include the addition of a bullet title “Nurse Practitioners” and to include them as providers that Physician Assistants would be able to refer patients to.

In light of these changes, ARAPA also requests updating the Nurse Practitioner Section II “214.330 Family Planning Coverage Information” section D to include Physician Assistants as referring providers. In addition, updating the Certified Nurse Midwife Section II “215.220 Family Planning Coverage Information” section D to include Physician Assistants as referring providers.

We thank you for your consideration.

Response: DMS is preparing a separate promulgation related to ACT 303 which will include Medicaid manual revisions for physician assistants. We will review your comments as we draft those proposed rules and look forward to receiving further comments during the promulgation process.