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March 12, 2015

RE: TESTIMONY IN SUPPORT OF HOUSE BILL 3021 WITH PROPOSED – 1 AMENDMENT

Chair Greenlick and Members of the Committee:

Hello, my name is Polly DeVore. I am the Director of Olive Branch Family Health, Inc. Our healthcare facility is a small privately owned family practice healthcare clinic.

In the ongoing barriers and struggles we encounter on a daily basis to provide our patients quality health care in the realm of battling thru obtaining prior authorizations, referrals, and meeting formularies we are now dealing with yet one more imposed burden and not by choice.

Virtual Credit Cards –

Our practice is fully electronic utilizing Athena Health, one of the top rated Cloud-based electronic health records, patient engagement, population health management and medical billing services for providers and health systems.

To explain how virtual credit cards “don’t process electronically and aren’t compatible” here is a step by step break down of what happens:

When the “virtual credit card payment” fax comes thru to our payer lock box with the banks they are unable to handle them. They are then attached to an EOB that is attached in the claim history that one has to open each Claim and search for their “virtual credit card” information. It isn’t straight forward regarding which claims you will receive these on and which ones will not. Most scenarios involve a claim that you are searching to find “why it wasn’t paid”? The insurance company will state electronically that they paid, the EHR and accounts receivable cannot reconcile a “fax” received with the virtual credit card information.

To “opt-out” involves a very **lengthy** amount of time spent on hold. It has been my experience while trying to opt out of receiving virtual credit cards, not all companies will handle it the same. If a virtual payment has been made, sometimes the company will provide you with the “code” and other times the policy holder will have to call and obtain the “code” that is required to either process said payment or nullify/void the virtual payment and have it issued in form of a check or EFT. Sometimes in addition to this “code” the 16 digit “Credit Card Number” is blacked out as well. The expiration date of credit card is not always accessible and the “CVC Code” that is located on the back of a credit card is also not accessible or provided. To obtain any of this information is a process again that requires more time spent on hold by either myself and/or policy holder.

All this and we haven’t even gotten to the fees! Generally the fees range in the realm of 2% - 5% of the amount being paid. These fees are charged to the facility.

The costs and barriers to the provider continue to mount!

The costs don’t stop there when one considers staff time involved. Office staff must key in the virtual card information should you be fortunate enough to obtain all the information required to process said

payment. These transactions do not include remittance advice information as required by electronic health care transaction standards under the Health Insurance Portability and Accountability Act. Remittance advice remarks must then be downloaded by staff, forcing yet one more step of attaching the EOB [Explanation of Benefits] to the payment.

My next issue with "Virtual Credit Cards" is the fact that there is a HUGE amount of money the insurance industry is sitting on in their bank accounts. Money they are claiming to their policy holders they have paid out on claims in the form of "Virtual Credit Cards". These "payments" are lost in the many layers it takes to first simply find that a claim was "paid" by a virtual credit card. The system our facility utilizes is incredibly transparent and it still takes many steps to "sleuth" this out. How many claims and "virtual credit card payments" become abandoned because of the inability to track? I believe insurance companies are making money off the use of "virtual credit cards" by having claims they state are paid which go truthfully unpaid and abandoned.

With the use of "virtual credit cards", there is no transparency but many layers of frustration. Providers are not currently given any option PRIOR to receiving a virtual credit card payment. It should be required that the provider "accept terms to opt-in" not have to go thru a lengthy process to opt-out followed with tracking down payments owed to the provider.

By definition, Virtual is very close to being something without actually being it. Well, that pretty much sums up a "virtual credit card payment". It's very close to being a payment ... without actually being it.

Virtual Credit Card payments are a virtual night mare and should not be allowed.

Sincerely,



Polly DeVore
Director
Olive Branch Family Health, Inc.

Enclosures:

Example of a Claim and Virtual Credit Card Timeline

Steps required resolving a Virtual Credit Card Issue

Screen Shot of what is required to truly process a credit card payment

Example of a Claim and Virtual Credit Card Timeline

Claim ID	Date	Description	Amount
XXXXX 99214,25	11/18/2014	CHARGE	\$174.30
		MEDICARE B-OR: NORIDIAN HEALTHCARE SOLUTIONS	
		THERESA RUSSELL	
XXXXX 99214,25	11/18/2014	PAYMENT	\$-69.88
		ACH *****9765	
		MEDICARE B-OR: NORIDIAN HEALTHCARE SOLUTIONS	
		THERESA RUSSELL	
		pmbatch #14130 EOB (claim)	
XXXXX 99214,25	11/18/2014	ADJUSTMENT	\$-86.59
		CONTRACTUAL (18245)	
		MEDICARE B-OR: NORIDIAN HEALTHCARE SOLUTIONS	
		THERESA RUSSELL	
XXXXX 99214,25	11/18/2014	TRANSFERIN COINSURANCE	\$-17.83
		CENTRAL STATES INDEMNITY OF OMAHA - PLAN F (MEDICARE SUPPLEMENT)	
		THERESA RUSSELL	
XXXXX 99214,25	11/18/2014	TRANSFERIN PATIENT	\$-17.83
		PATIENT TRANSFER	
		THERESA RUSSELL	
			\$0.00
			\$17.83

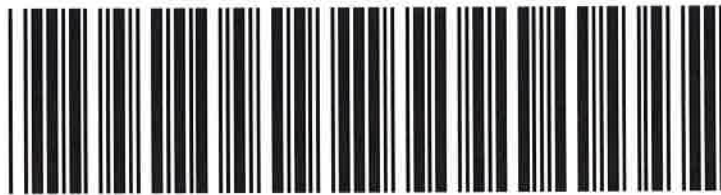
OUTSTANDING

- Date of service 11/18/2014
- Payment and Contractual Adjustment from Medicare 12/04/2014
- 12/04/2014 Coinsurance processes electronically from Medicare to the secondary CSI for processing of the co-insurance amount \$17.83
- January 19, 2015 the claim processes to the patient for non-payment from insurance. There was not any possibility of processing the "Virtual Credit Card" either thru electronic means or manually.
- After many phone calls between policy holder, secondary insurance company and healthcare facility March 11, 2015 secondary insurance company acknowledged "blacked out" Virtual Credit card, stated they would void it, "opt" our facility out of the Virtual Credit Card payments for the future and asked us to "freeze" any future billings until they have their "opt-out" fully in effect. (Yet another delay!)
- Once the "Virtual Credit Card" is actually voided and confirmed as voided by the secondary insurance an EFT or paper check will be issued. That payment "will be cut on the next payment batch" per customer service agent. We can expect payment on this within a month. That would be mid-April 2015.

Step 1 - looking for payment.

**ATHENAHEALTH
PAYMENT BATCH IMAGE HEADER**

DATE CREATED	12/18/2014 03:47:47pm
BATCH CREATED BY	vhssathyamoorthi
SCANNED BY	
DEPOSIT BATCH ID	6357
PAYMENTBATCH ID	14247A2661
PAYMENTBATCHROUTE	ABP/Perot
PAYMENTBATCH TOTAL	\$0.00



2661

CLIENT NAME:

OR - Olive Branch Family Health, Inc

NOTES:

* Payment Batch enacted by a
Search looking for a payment.

Exit Payment batch # 14241

Step 2.

Date opened: 12/18/2014

Opened by: ATHENA unassign assign to pdevore

Deposit date:

Deposit batch ID: #6357 (created 12/18/2014 by DOCMANAGEMENT) (target \$316.14) (closed)

Each user can have only one open payment batch at a time.

Current payments: \$0.00

Current unpostables: \$0.00

Total payment batch amount target: \$0

Amount out of balance: \$0.00

Payment batch processing route: Manual

For ERA batch: 76063R2661 [OR - Olive Branch Family Health, Inc]

Check #: 00628358

Check amount: \$17.83

Says check but when you open batch line # 14247 it shows "Virtual Credit Card".

Notes:

Split by: vhssathyamoorthi

Link to Virtual Credit Card

- View detail for batch #14247
- View EOB: EOB (batch) | View attached paper (pdf) ← select to get to the "Virtual Credit Card"
- View batch unpostables
- Show scanner cover sheet
- Edit deposit batch #6357
- Audit history

Save Cancel

Step 3 EOB

CSI Central States Indemnity Co. of Omaha
Medicare Supplement
P.O. Box 10815
Clearwater, FL 33757-8815
CENTRAL STATES INDEMNITY
A Berkshire Hathaway Company

Customer Service
1-855-664-5517



Forwarding Service Requested

Please visit our website to verify eligibility and obtain claim status information:
<https://service.iasadmin.com/csi>

*****5-DIGIT 04915
2006 1 AV 0.381
OLIVE BRANCH FAMILY HLTH
PO BOX 9548
BELFAST ME 04915-9548

Pay To: OLIVE BRANCH FAMILY HLTH
Voucher #: 03495260
Check #: 00628358
Amount: \$17.83
Date: 12/10/14

THIS IS NOT A BILL
Explanation of Supplemental Insurance Benefits

Insured Date of Service Patient Account #	Claim # Total Charge	Medicare Allowed	Deductible/ Copayment	Medicare Deductible Paid	Part B Excess Paid	Part A Deductible/ Coinsurance Paid	Total Paid	Policy Number Remark Code(s)
11/18/14-11/18/14	174.30	89.14	0.00	0.00	0.00	17.83	17.83	11
Claim Totals	174.30	89.14	0.00	0.00	0.00	17.83	17.83	
Voucher Totals	174.30	89.14	0.00	0.00	0.00	17.83	17.83	

DESCRIPTION OF REMARKS

11 CLAIM REFLECTS MEDICARE AND/OR POLICY/CERTIFICATE TERMS.

ATTENTION HEALTHCARE PROVIDERS
Did you know we offer you the option to receive claim payments and EOBs electronically? Register today for EFT (Electronic Fund Transfer) & ERA (Electronic Remittance Advice). Go to the website shown in the upper right hand corner of the EOB. Register yourself as a user, check the box for HIPAA transactions and follow the steps for 835 enrollment. If you have any questions, please contact the Provider Relations Department at 727-584-0007 ext 2150. Apply for your NPI at <https://nppes.cms.hhs.gov/>

EOB Original provider HCFA/UB04 or RX receipts required for claims consideration. Photocopies are not acceptable.

* Reflects paid by insurance company however practice unable to process automatically as a true EFT. Must manually search for information prior to steps of processing; And still unable to process.
* Areas Blackened on This page by Clinic per HIPAA Compliance -
* Notice → "Voucher totals" above highlighted
"Voucher" would be your clue you are looking for a "Virtual credit card".

Central States Indemnity Co. of Omaha
 Medicare Supplement
 P.O. Box 10815
 Clearwater, FL 33757-8815

Step 4

Virtual
 Credit
 Card

CSI
 CENTRAL STATES INDEMNITY
 A Berkshire Hathaway Company



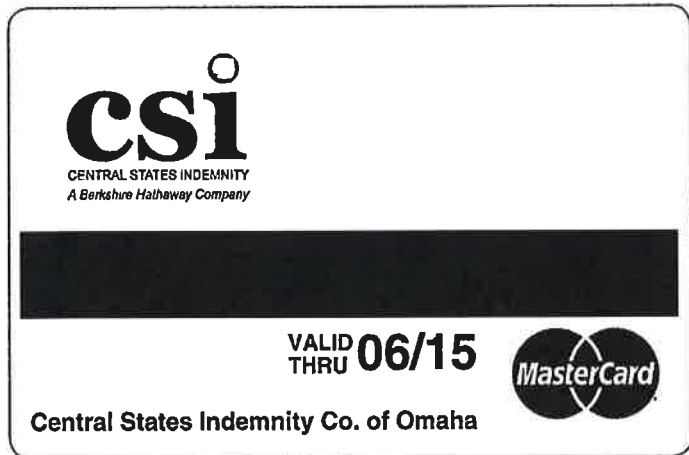
OLIVE BRANCH FAMILY HLTH
 PO BOX 9548
 BELFAST, ME 04915

Unable to process!

How to Process Your Payment

The document you are holding is a payment for services provided. The image below is a virtual payment, or VPayment®, sent on behalf of Central States Indemnity Co. of Omaha, who has partnered with VPay® to provide a faster, more efficient way to reimburse your business for services rendered. The VCard® is a virtual corporate purchasing card and can be processed through your merchant terminal as a MasterCard transaction.

Note: In accordance with your MasterCard agreement, a VPayment® is a legal and recognized form of payment for claims administration and therefore must be considered as such. Any attempt to deny payment could be a violation of your merchant agreement and result in non-payment.



Claim ID: [REDACTED]

Client Reference ID: [REDACTED]

SE Transaction ID: 46430676
 IASM001004

Date: 12/11/2014

Amount: \$17.83

How can this be processed?

Insurance ID + Claim ID
 blackened by Clinic per
 HIPAA

To Process Your Payment:

1. Type the 16-digit number (located on the VPayment® above) into your merchant terminal.
2. Enter the amount (located above) when prompted by the terminal.
3. Enter the CVC code (located on the VPayment® above) if required.
4. No PIN is required.
5. If the terminal prompts for an address or zip code, enter: 111 W. Spring Valley Rd., Richardson, TX 75081.
6. If there are any problems with the receipt of this payment, please call the VPay® Customer Service Center at **1-855-808-7454**. Please have your Client Reference ID (located above) available for reference.
7. If you have questions regarding your claim or benefit plan, please contact Central States Indemnity Co. of Omaha at 1-855-664-5517.

This is how we receive the Blacked out

Legal Disclaimer: Any attempt to replicate, reuse, or exceed the dollar amount is considered fraudulent use of the VCard® and is prosecutable by law.

IMPORTANT HIPAA NOTICE - The information contained in this VPay communication contains data considered Protected Health Information under the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and is transmitted subject to HIPAA privacy rules and subsequent penalties for improper use. If the information contained in this communication does not pertain to a current patient of this facility, please (1) notify VPay immediately at (877) 399-5917 and provide the SE Transaction ID shown (2) destroy this communication and all attached information.

Payment technology protected by one or more patents, see <http://www.stoneeagle.com/patents/>. Additional patents pending

EHR - Athena Health.

Screen shot of what we need to process a credit card payment.

Collect Payment

Warning: a Patient Statement was generated for this patient on 02/24/2015. Are you sure you want to collect money or create a contract for this patient?

Today's Payment Amount

Service Date	Procedure	Outstanding Amount	Today's Payment
11/16/2014	99214 DETAILED I.C. EST	\$17.83	\$17.83

Other Payment Amount Reason:

Eligibility Financial Summary

Primary (No financial information available for Secondary policy)

The primary member is not a participant of coverage. Active services are approved only when the claim is received

MEDICARE B-COR. MEDICARE HEALTHCARE SOLUTIONS (66646) on 02/23/2015

- Standard consultation: 0%, per visit
- Standard consultation: 0%, per visit
- Standard consultation: 0%, per visit
- Standard consultation: 0%, per visit

TOTAL PAYMENT

TOTAL DUE = Charges - Unapplied Credit = \$17.83

Payment Information

Post Date: 02/23/2015

Department: OLIVE BRANCH CLINIC

Swipe card or scan check now

Payment type: Credit Card Card Present Telephone/Mail Merchant's Site?

Payment method: [Dropdown]

Credit card number: [Masked]

Security code: [Masked]

Expiration date: [Dropdown]

Cardholder's name: [Redacted] is paying for [Redacted]

Please verify you are entering the correct patient before submitting.

Reset Scanner

Billing address

Use patient address

Address line 1

Address line 2

City

State

ZIP

Collect payment

Clear | Close window