

Re: Insurance Committee Hearing  
Date: June 9, 2022

Best Care Nursing Services DIFS interactions and concerns:

**DIFS Complaints:**

Claim # 21-1896

U/R Filed 12.22.21

NOA (Notice of Appeal) – 2.13.22

NOE (Notice of Extension) – 3.03.22

4.07.22 – DIFS requested clarification on CDM

4.20.22 – E-mailed U/R & Complaints – **order was to be issued no later than**

**3.30.22 – No FINAL ORDER as of the 4.20 e-mail**

5.25.22 – DIFS Consolidated (22-1374)

Claim # 21-1471

U/R Filed 1.13.21

NOA (Notice of Appeal) 1.13.22

NOE (Notice of Extension) 3.02.22

Final Order 4.19.22

**4.22.22** Filed a complaint regarding 56 hour family time

**5.31.22 Payment received** for family time

Claim # 21-1473

**9.17.22 Complaint**

U/R Filed 10.11.21

NOA 10.15.21

NOE (Notice of Extension) 12.01.21

**12.17.22 Complaint** (again)

**Final Order 1.07.22**

Claim # 21-1869

U/R Filed **12.17.21**

NOA 01.11.22

NOE (Notice of Extension) 03.01.22

**FILED COMPLAINT 4.22.22 – ORDER WAS TO BE ISSUED NO LATER THAN**

**March 29**

**Final Order 05.03.22**

**Additional DIFS Complaints filed on the following for lack of payment:**

Client AP – Filed Complaint 09.23.21 – no payment received for months July  
– October with no payment – to litigation

Client IR – Filed Complaint 9.24.21 – No payment received September – October

Client DL – Filed Complaint 12.17.21 – 1 payment received from 5/24/21 – 8/02/21

**\*\*Additional Notes regarding DIFS Complaints:** We found this process to be not be timely and required more paperwork, more questions and more time for little return.

**DIFS Utilization Review Submissions:**

Total number of Invoices Submitted: **277**

**Required paperwork with each submission:**

Appeal Request

Attestation Form

Designation of Authorized Representative

LOMN

Narrative

EOR

UB-04

Bill Rates

Redacted Invoices

LUPA Rules (submitted by BCNS choice)

Total Number completed with responses: **86 Invoices have received a FINAL ORDER**

Total Number of completed responses within the 60 days that is outlined: **0**

Total number completed within 90 days: **23 Invoices**

Total number completed in more than 90 days: **63 invoices**

Total number outstanding currently: **191 invoices**

**List of reason for delays:**

Requested clarification on Rate

Extensions

Looking for EOR's for days that no service was performed

Denial Dates / Dates of Determination not matching (asked for clarification multiple times)

Transmission Error

Requested Attestation Form

Requested Redacted Invoices

Requests to resend Appeals

**Other Issues related to DIFS UR:**

Lack of communication on DIFS behalf  
Issues with the CDM  
Extensions Requested

In the beginning, we received a copy of the Notice of Appeal(NOA) sent to the Insurance company fairly quickly, I have some that are more than 30 days before we receive a copy of the NOA.

Extensions are being requested on some 30+ days past the NOA

Example – U/R Filed 12.17.21 – NOA sent to Ins Co 01.11.22 – Notice of Extension 03.02.22 – Final Order – 05.03.22

U/R Filed 12.03.21 – NOA sent to Ins Co 12.20.21 – Notice of Extension 02.04.22 – Final Order 03.28.22

U/R Filed 01.28.22 – NOA sent to Ins Co 02.15.22 – Notice of Extension 04.06.22 – Final Order 06.06.22

**Additional Notes:** This process does not live up to the 60-day turnaround time outlined in DIFS information. The requirements for paperwork have mounted over time and there is a significant back log of submissions at all times. All of these factors negatively affect our business and the cash flow issues related to nonpayment and short payments.

Because we are attempting to access the \$25 million-dollar ANF fund, we continue jumping through the hoops to try to reach \$500,000 processed through DIFS UR in hopes of receiving the fund for that amount.

**DIFS/ Auto No-Fault Relief Fund:**

**1<sup>st</sup> application:**

Submitted 1/21/2022

Denied 1/28/2022: Incomplete areas:

- 1) Full financial statements indicating a systematic deficit.
- 2) Full list of charges & payments from 2019.
- 3) Metrics on charges & payments believed to be inadequate.

**2<sup>nd</sup> application:**

Submitted 4/4/2022

Denied 4/19/2022: Incomplete areas:

- 1) Full financial statements indicating a systematic deficit.
- 2) Documentation indicating a good faith effort to alter business practices to adhere to MCL 500.3157.

**3<sup>rd</sup> application:**

Submitted 5/6/2022

Confirmed Sufficient Documentation 5/20/2022. Application will be sent to third party accounting firm for review. We are to receive a determination no later than June 10, 2022.

**Primary Concerns/ Problems with the application:**

- 1) No instructions or examples. One is left to guess what would satisfy the requests.
- 2) Request for Full financial Statements that indicate a systematic deficit. There is no definition for systematic included in the application.
- 3) We had to redact all 2019 invoices so we could submit them in the application. This took a lot of time to accomplish and was a few thousand pages long.
- 4) One area requested documentation proving that we billed at rates that are below the cost of providing the service. Why would we bill at rates less than the cost of providing the service? We are a for profit business!!!
- 5) Another area requested “amount of attempted billed charge”. What does that mean?
- 6) Another section requested evidence to demonstrate that provider attempted to bill for a service that lacks a medicare code and has not been paid at the charged rate. (So in point #4, we are supposed to prove that we billed at rates below cost but in point #5 & #6 we have to prove that we attempted to bill at rates that aren't being reimbursed at the billed rate. This seems somewhat contradictory.)
- 7) IF we succeed in getting this approval, we can only receive money for the billing amount submitted. This leads us to believe we will have to do additional applications again for clients that have a different fee schedule.
- 8) IF we get gain approval, we are still waiting on over 100 invoices to complete processing with UR DIFS in order to submit for funds. The fund ends in September and DIFS is moving slow.

Thank you for taking the time to review this information. Our collective clients and businesses are counting on you to help get these glaring issues resolved!

**Best Care** +  
Nursing Services