

May 7, 2021

The Honorable Senator Benson

The Honorable Representative Liebling

RE: Omnibus Health and Human Services Bill (HF 2128/SF 2360)

Sen. Benson and Rep. Liebling,

My name is Randall Thompson. I am the Executive Director of Minnesota Oncology. Our practice is the largest private-practice oncology group in Minnesota.

I am writing to you to share our concerns regarding the HHS Omnibus Bill. While Minnesota Oncology believes in transparency of business practices, we do have many concerns:

- 1. We are a physician-owned medical practice and do not have the resources that the large health systems have to comply with the data capture and reporting requirements of this bill.
- 2. Minnesota Oncology has almost 900 identifiable services on our "charge master". In order to compile and report our charges, as well as payer reimbursement for each of those codes and to keep it current, we would need to hire one FTE at a cost of \$60,000+. Not only do we have over 900 services, but the permutations of services in combination (few patients receive 1 line item service) and the complexity of billing and coding rules payers (both government and commercial) impose additional challenges to posting full service pricing and can influence final pricing estimates based on how payers process combinations of codes (e.g. care bundles). Oncology is an especially complex specialty practice with very sick patients.
- 3. We are not an Epic practice that is a health system electronic medical record system. We would have to have a custom program written in our practice management system or manually compile and enter the data. Keeping that data up-to-date would be another burden and obligation. Reimbursement levels for drugs, for example, are constantly changing based on quarterly Medicare reports.
- 4. In our contracts with insurance companies (payers), there are terms and conditions that require confidentiality around rates and reimbursement levels. How would this bill handle those issues?
- 5. Finally, we do not believe this bill would improve quality of care and may lead to further patient confusion.

I appreciate your consideration of our position on this bill.

Thank you for your time.

Randall Thompson
Executive Director
Minnesota Oncology
Randy.thompson@usoncology.com