



Michael R. Pence, Governor
State of Indiana

Indiana Family and Social Services Administration
402 W. WASHINGTON STREET, P.O. BOX 7083
INDIANAPOLIS, IN 46207-7083

FSSA's Family Impact Statement - Electronic Signatures for Prior Authorization Requests

Executive Order 13-05 (the "Order") requires the Indiana Family and Social Services Administration ("FSSA") to assess a proposed rule's impact on family formation and general well-being and to certify its compliance with the Order. FSSA hereby submits this certification that it has assessed the proposed rule's impact on family formation and general well-being based on the enumerated considerations listed in the Order.

Background and summary of the rule

In order to receive reimbursement for certain Medicaid services, Indiana medical providers must receive approval from FSSA by submitting clinical justification for the services provided, a process known as "prior authorization." Currently, 405 IAC 5-3-5(c)(2) limits the means by which providers can sign and submit such prior authorization ("PA") requests to an original signature (i.e. ink on paper) or a copy of an original signature such as a signature stamp. FSSA is currently undergoing implementation of the new Medicaid Management Information System (MMIS).¹ The new system includes an upgrade allowing providers to "sign" a PA request form online and transmit it electronically to the State's contractor for processing. Without a revision to the current rule, providers cannot submit PA requests electronically and instead must print the completed PA request form, sign it, and either mail or fax it for processing. The proposed rule removes the administrative requirement limiting signatures on PA requests to original signatures or copies and amends the rule to permit electronic signatures.

Impact of the proposed rule on family well-being or family formation

FSSA assessed the proposed rule's impact on family formation and well-being in light of the six considerations enumerated in the Order. In general, removing an administrative regulation preventing Medicaid providers from submitting PA request forms electronically does not discourage traditional family formation or encourage family dissolution. The proposed rule merely removes an administrative requirement limiting providers to submitting their PA requests with original signatures or copies of original signatures. Accordingly, FSSA expects that the proposed rule will have a **neutral** impact on family well-being or family formation. FSSA's responses to the enumerated measures are as follows:

¹ MMIS is a mechanized claims processing and information retrieval system that states are required to have in order to obtain federal funding for Medicaid.



1) Whether or not this action by government strengthens or erodes the stability of the family and the marital commitment.

Response: The proposed rule simply removes an administrative requirement limiting signatures on PA requests to original signatures or copies and amends the rule to permit electronic signatures. Therefore, the proposed rule neither strengthens nor erodes the stability of the marital commitment.

2) Whether or not this action encourages or discourages non-marital childbearing.

Response: The proposed rule simply removes an administrative requirement limiting signatures on PA requests to original signatures or copies and amends the rule to permit electronic signatures. Therefore, the proposed rule neither encourages nor discourages non-marital childbearing.

3) Whether or not this action respects or inhibits the rights of parents to raise their children and make the best choices about their children's education, health, and well-being.

Response: The proposed rule simply removes an administrative requirement limiting signatures on PA requests to original signatures or copies and amends the rule to permit electronic signatures. Therefore, the proposed rule has no bearing on the rights of parents to raise their children and make parental choices.

4) Whether or not this action increases or decreases private family earnings or the incentive for parents to provide materially and emotionally for their children.

Response: The proposed rule simply removes an administrative requirement limiting signatures on PA requests to original signatures or copies and amends the rule to permit electronic signatures. Therefore, the proposed rule neither increases nor decreases family earnings or the incentive for parents to provide for their children.

5) What message, intended or otherwise, does this program send to the public concerning the status of the family?

Response: The proposed rule simply removes an administrative requirement limiting signatures on PA requests to original signatures or copies and amends the rule to permit electronic signatures. Therefore, the proposed rule does not send any message, positive or negative, concerning the status of the family.

6) What message does the action send to children about the relationship between their present choices and their future well-being?

Response: The proposed rule simply removes an administrative requirement limiting signatures on PA requests to original signatures or copies and amends the rule to permit electronic signatures. Therefore, the proposed rule does not send any message, positive or negative, about the relationship between their present choices and their future well-being.



Family Impact Assessment

Documentation of new Policies and Rules

Pursuant to Section 2(a)-(f) of Executive Order 13-05:

In formulating and implementing policies and rules that may have a significant impact on family formation and general well-being, the agencies listed in Section 1 of Executive Order 13-05 shall assess such measures in light of the following considerations:

- 1) **Whether or not this action by government strengthens or erodes the stability of the family and the marital commitment.**
- 2) **Whether or not this action encourages or discourages non-marital childbearing.**
- 3) **Whether or not this action respects or inhibits the rights of parents to raise their children and make the best choices about their children's education, health, and well-being.**
- 4) **Whether or not this action increases or decreases private family earnings or the incentive for parents to provide materially and emotionally for their children.**
- 5) **What message, intended or otherwise, does this program send to the public concerning the status of the family?**
- 6) **What message does the action send to children about the relationship between their present choices and their future well-being?**

These assessments should be answered on a separate document attached to this submission form and clearly marked as answers to considerations 1-6. If an agency does not think that a consideration applies to their proposal, the agency must include an explanation of why the consideration does not apply. Additionally, if the proposal contains a potentially negative impact on family well-being or family formation, the agency must include an explanation of why the proposal is necessary.

This submission form and the agency assessments should be submitted simultaneously with the proposed policy or rule to the Office of Management and Budget.

By signing below, the agency head certifies that they are aware of the Family Impact Assessment, and all information submitted is accurate to the best of their knowledge.

Debra J. Minott
Agency Head Signature

6-26-14
Date

FSSA
Agency