



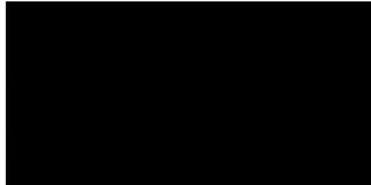
STATE OF WASHINGTON

**DEPARTMENT OF HEALTH**  
**SCREENING AND GENETICS UNIT**

20425 72<sup>ND</sup> Ave. South, Suite #310, MS K17-12  
Kent, Washington 98032

October 23, 2017

OIC Case Number:  
Provider Name:  
Case Number:  
NAIC Number:



Dear Ms. [REDACTED]

Staff from the Genetic Support Foundation (GSF) forwarded to me the response letter you provided to the Office of the Insurance Commissioner following an inquiry by GSF as to why insurance claims for genetic counseling services (CPT 96040) are repeatedly denied. I am more than a little confused by your response so am requesting clarification.

First you state that CPT 96040 is not a covered service because the Centers for Medicare and Medicaid Services (CMS) classifies this code as "Status Indicator B." While this certainly would justify why this is not a covered service for Medicare clients, it is not a blanket denial for the use of this code. In fact, the State of Washington Medicaid program does authorize Genetic Counseling and requires the use of CPT 96040 when billing for these services by a recognized provider. <https://www.hca.wa.gov/assets/billers-and-providers/physician-related-serv-bi-20171001.pdf> (See page 174). I also consulted with Dr. Dick Whitten from Noridian Healthcare Solutions, the CMS contracted local coverage determination vendor, who confirmed that a CMS distinction of a bundled service does not equate to a blanket denial.

Given that certain genetic counseling services have mandated coverage, namely,

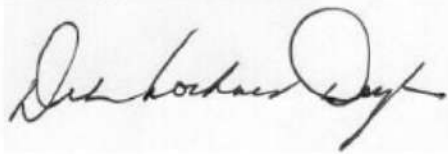
- prenatal diagnosis genetic counseling (RCWs 48.44.344; 48.46.375; 48.21.244 WAC 246-650) and,

- as required by the Affordable Care Act, genetic counseling for the risk of breast cancer as a Category B classification recommendation by the U.S. Preventive Services Task Force)

my question for you is - how should Genetic Support Foundation, and other genetic service providers, submit insurance claims to [REDACTED]?

I thank you in advance for your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Debra Lochner Doyle". The signature is fluid and cursive, with a large loop at the end.

Debra Lochner Doyle, MS, LCGC  
State Coordinator for Genetic Services