



August 24, 2018

Director Mike Randol  
Department of Human Services, Iowa Medicaid  
Hoover State Office Bldg. 5<sup>th</sup> Floor  
1305 E. Walnut St.  
Des Moines, IA 50319

Dear Director Randol,

Thank you for meeting with us regarding the retirement of numerous emergent diagnosis codes. Attached is a list of codes which we request be reinstated as emergent because they contradict requirements imposed upon providers by federal law and impede providers' ability to deliver care. This list does not include all codes in conflict, but are the 20 most egregious, listed in order of importance to the signatories of this letter.

EMTALA (42 U.S.C. § 1395dd) requires providers to see every patient seeking emergency care, appropriate to the patient's presenting symptoms. The "prudent layperson standard" (42 C.F.R. § 438.114) protects patients from self-diagnosing, and requires that Medicaid cover visits based on the patient's symptoms.

These codes represent symptoms of critical or serious health conditions, and a reasonable person should present to an ER. Providers must see the patient in order to assess whether the patient's condition is serious or benign, and determine an appropriate plan for care. These represent a significant portion of services provided by EDs. Their retirement will harm patients and severely harm providers.

We appreciate your consideration, and are happy to provide additional information or perspective that might be helpful to you.

Sincerely,

Henry J. Marquard  
Government & Community  
Relations Officer  
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CC: Governor Kim Reynolds