March 6, 2017

*** BH Redesign Updates

The Ohio Department of Medicaid (ODM) and Ohio Department of Mental Health and Addiction Services (OhioMHAS) are pleased to provide the following updates related to Behavioral Health Redesign:

- **Documentation** - ODM and OhioMHAS fully support the use of electronic medical records (EHRs) by community behavioral health providers. As such, our rules will include the ability to use structured “drop down” and “check list” options that support individualized clinical documentation. Please keep in mind that cloning is not an acceptable documentation practice. You can reference [https://www.cms.gov/Medicare-Medicaid-Coordination/Fraud-Prevention/Medicaid-Integrity-Education/Downloads/docmatters-ehr-providerfactsheet.pdf](https://www.cms.gov/Medicare-Medicaid-Coordination/Fraud-Prevention/Medicaid-Integrity-Education/Downloads/docmatters-ehr-providerfactsheet.pdf) for additional Federal information on EHRs.

- **Crisis Services** (crisis psychotherapy, therapeutic behavioral services [TBS], psychosocial rehabilitation [PSR] and SUD Individual Counseling) - Since releasing the updated “Medicaid Behavioral Health State Plan Services” manual on January 24, 2017, ODM and OhioMHAS have received questions regarding these crisis services provided to persons who are in emergency rooms, specifically when the hospital does not have the appropriate behavioral health staff available. These questions were initiated because of the omission of place of service 23 Emergency Room – Hospital as an allowable place of service for listed crisis services. ODM and OhioMHAS will be updating the “Medicaid Behavioral Health State Plan Services” manual to include place of service 23 as allowable for these crisis services.

- **Scope of Practice for Registered Nurses (RNs) or Licensed Practical Nurses (LPNs) and Community Psychiatric Supportive Treatment (CPST)** - With changing our approach to an increased deference to professional scopes of practices, many behavioral health providers have been particularly focused on our RN or LPN practitioners. The Ohio Board of Nursing has purview over the scopes of practice for RNs and LPNs and has published guidance on this topic which is available on their website here: [http://www.nursing.ohio.gov/PDFS/Practice/RN_and_LPN_Scope_of_Practice.pdf](http://www.nursing.ohio.gov/PDFS/Practice/RN_and_LPN_Scope_of_Practice.pdf).
We understand that many activities of CPST fall within the scope of practice of a RN or LPN and services within their scope should be billed as RN or LPN services. Questions regarding the scope of practice of either an RN, or an LPN should be directed to the Board of Nursing at practice@nursing.ohio.gov. It is the responsibility of the licensee and their supervisor or ordering to know and operate within their scope of practice. Please keep in mind that RN and LPN nursing services beyond 24 hours per patient per calendar year may be requested through prior authorization.

- Minimum staffing requirements for the American Society of Addiction Medicine (ASAM) residential levels of care – By adopting the ASAM Criteria as the clinical guide for OhioMHAS certification and the Ohio Medicaid substance use disorder (SUD) benefit package, Ohio is adopting a national model that supports improved individualized assessment and outcome driven care for individuals with SUDs and co-occurring conditions. ODM will be clarifying the rule language related to staffing requirements for the ASAM residential levels of care. The SUD residential programs are responsible for assuring the appropriate provision of comprehensive SUD, biomedical and co-occurring services to residents as the per diem payment rates are based on this aspect of the ASAM residential levels of care. For individuals receiving SUD residential treatment services, Medicaid may also pay for site administered behavioral health medications (J-codes, please reference Table 2-6: Medications Administered by Medical Personnel in the “Medicaid Behavioral Health State Plan Services”) and opioid treatment program (OTP) services provided at an OTP.

- In response to provider feedback ODM and OhioMHAS will be removing TBS and PSR from the counseling tab of the Behavioral Health Redesign Workbook and moving them to the recovery supports tab. This is being done to distinguish that TBS and PSR are services provided by QMHSs with appropriate education or experience.

- Urine drug screening (UDS) collection and handling (H0048) - ODM and OhioMHAS will be increasing the payment rate for UDS from the current $11.48 to $14.48.

- Other place of service (99) - Since releasing the updated “Medicaid Behavioral Health State Plan Services” manual on January 24, 2017, ODM and OhioMHAS have received questions regarding the discontinuation of paying for services when the place of service other (99) is submitted. The original policy decision on discontinuing payment when the other place of service code is submitted was to encourage the use of a more accurate and applicable place of service code associated with a given service. In discussing this change with providers, there are instances where services are provided in a setting (place) or in multiple settings (places) and there isn’t a representative place of service code. To this end we will permit appropriate use of place of service 99 and provide guidance in our rules and in the provider manual on the use of this place of service.

- Training Opportunities - ODM and OhioMHAS, in partnership with the Ohio Association of County Behavioral Health Authorities (OACBHA) are preparing a “Fundamentals of Behavioral Health Redesign”. The purpose of these trainings is to provide a
comprehensive training on all finalized policy decisions (benefit limits, per diem payments, MITS testing, managed care, etc.) and associated information to support providers and practitioners in successfully making the July 1, 2017 transition. These community based trainings are going to be held in/near Cincinnati, Cleveland, Columbus, Toledo and Zanesville. Dates for the trainings are: March 20, March 21, March 22, March 28 and April 7. Registration and additional information can be found at http://www.oacbha.org/behavioral_health_redesign - r.php. ODM and OhioMHAS intend to record one of the last trainings and to make it available via the internet.

- Medicaid Information Technology System (MITS) Trading Partner (TP) testing – In response to feedback from the field ODM will open trading partner testing in early May. More information will be forthcoming via MITS Bits.

For more information on Behavioral Health Medicaid Redesign, visit http://bh.medicaid.ohio.gov. We value your feedback and questions. Submit inquiries HERE.