

Bulletin Number: MSA 20-02

Distribution: Practitioners, Outpatient Hospitals, Federally Qualified Health Centers, Local Health Departments, Rural Health Clinics, Community Mental Health Services Programs, Prepaid Inpatient Health Plans, Medicaid Health Plans, Tribal Health Centers

Issued: January 31, 2020

Subject: Updates to Limited License Psychologist Enrollment and Medicaid Fee-for-Service Billing Requirements

Effective: March 1, 2020

Programs Affected: Medicaid, Healthy Michigan Plan, Children’s Special Health Care Services, Maternity Outpatient Medical Services

This bulletin updates the enrollment of Master’s Limited License Psychologists (LLPs) and Doctoral Educational LLPs and billing of services performed by these providers. These changes align current LLP policy and reimbursement guidelines with MDHHS enrollment and claims processing systems. This policy is effective March 1, 2020.

Individuals licensed as Master’s LLPs or Doctoral Educational LLPs who provide services to Medicaid beneficiaries are required to be Medicaid-enrolled providers and be uniquely identified on claims. Throughout this policy, any reference to LLPs pertains to both these provider types unless otherwise stated.

Enrollment of LLPs

To enroll as a Medicaid provider, the LLP must complete an online application in the Community Health Automated Medicaid Processing System (CHAMPS). LLPs should enroll with an individual (Type 1) National Provider Identifier (NPI) and select the “Limited License Psychologist” specialty designation within CHAMPS.

LLPs are required to enroll as Rendering Only providers and associate themselves to at least one billing provider within CHAMPS. The billing provider must be enrolled with the Medicaid program and have a Group/Organizational (Type 2) NPI or Medicaid Provider Identification number. Associated billing providers may be either employers or organizations the LLP is contracted with to perform services (i.e., Community Mental Health Services Programs [CMHSP], Prepaid Inpatient Health Plans [PIHP], etc.). LLPs should contact the employer or organization directly for their Medicaid Provider Identification number or NPI, (if unknown), before attempting to enroll.

All other current LLP provider qualifications, including licensing and supervision requirements, remain unchanged. Providers should refer to the Non-Physician Behavioral Health Appendix of the Behavioral Health and Intellectual and Development Disability Supports and Services chapter of the Medicaid Provider Manual for further information.

Current CHAMPS Enrolled LLPs

A provider specialty labeled “Limited License Psychologist” has been created within CHAMPS to separately identify LLPs from fully licensed psychologists. LLPs currently enrolled within CHAMPS under the “Licensed Psychologist” specialty or enrolled with a specialty of “Limited License Psychologist-Managed Care Only” will be automatically reassigned by the Michigan Department of Health and Human Services (MDHHS) to the new “Limited License Psychologist” specialty before February 29, 2020. This specialty reassignment does not require managed care only providers to participate with the Medicaid Fee-for-Service (FFS) program.

In addition to specialty reassignment, LLPs currently enrolled as individual/sole proprietors within CHAMPS will also be automatically reassigned by MDHHS to a Rendering/Service Only provider type. LLPs without a current billing provider designation will be contacted by MDHHS Provider Enrollment staff before February 29, 2020 to assist with an assignment. Providers may also initiate the billing provider assignment by contacting Provider Support at 800-292-2550. Billing providers must be designated by February 29, 2020 in order to avoid claim denials.

Medicaid Fee-for-Service (FFS) LLP Billing and Reimbursement

Information contained in this section applies to Medicaid FFS only.

Medicaid covers medically necessary outpatient psychology services (as defined in Section 333.8201 of the Public Health Code [Act 368 of 1978]) performed by LLPs when the beneficiary is not enrolled in a Medicaid Health Plan (MHP)/Integrated Care Organization (ICO) or services are not included in the capitation payments to the Prepaid Inpatient Health Plans (PIHP) and Community Mental Health Services Programs (CMHSP). When beneficiaries are enrolled in an MHP/ICO or services are included in the PIHP/CMHSP capitated payments, the provider must check with the appropriate entity for billing and claim completion instructions.

LLP services must be performed under the supervision of a Medicaid-enrolled, fully licensed psychologist (LP), except as noted in Section 333.18223 of the Public Health Code. Supervision is defined under Section 333.16109 of the Public Health Code as follows:

“Supervision”, except as otherwise provided in this article, means the overseeing of or participation in the work of another individual by a health professional licensed under this article in circumstances where at least all of the following conditions exist:

- (a) The continuous availability of direct communication in person or by radio, telephone, or telecommunication between the supervised individual and a licensed health professional.*
- (b) The availability of a licensed health professional on a regularly scheduled basis to review the practice of the supervised individual, to provide consultation to the supervised individual, to review records, and to further educate the supervised individual in the performance of the individual's functions.*

- (c) *The provision by the licensed supervising health professional of predetermined procedures and drug protocols.*

Medicaid reimburses the LLP's associated billing provider. For dates of service on and after March 1, 2020, LLPs should no longer bill for services requiring supervision under their supervising LP's NPI. Supervised services billed on a professional claim form must include the NPI of the LLP in the Rendering Provider field and the NPI of the supervising LP in the Supervising Provider field.

Refer to the Michigan Medicaid Practitioner fee schedule published at www.michigan.gov/medicaidproviders >> Billing & Reimbursement >> Provider Specific Information >> Mental Health/Substance Abuse >> Non-Physician Behavioral Health for Fee-for-Service (FFS) reimbursement rates or the Medicaid Code and Rate Reference tool within CHAMPS for LLP covered services and reimbursement rates.

Temporary Master's Educational Limited Licenses

The current policy remains unchanged for individuals holding Temporary Master's Educational Limited Licenses. Temporary Master's Limited License Psychologists (TLLPs) are not eligible to enroll as Medicaid providers or be directly reimbursed by Medicaid. Services performed by TLLPs should continue be billed to Medicaid under the NPI of the enrolled supervising LP. The supervising LP must be listed as the Rendering Provider on the claims.

Providers should refer to the Non-Physician Behavioral Health Appendix of the Behavioral Health and Intellectual and Developmental Disability Supports and Services chapter of the Medicaid Provider Manual for further information.

Manual Maintenance

Retain this bulletin until the information is incorporated into the Michigan Medicaid Provider Manual.

Questions

Any questions regarding this bulletin should be directed to Provider Inquiry, Department of Health and Human Services, P.O. Box 30731, Lansing, Michigan 48909-8231, or e-mailed to ProviderSupport@michigan.gov. When you submit an e-mail, be sure to include your name, affiliation, NPI number, and phone number so you may be contacted if necessary. Providers may phone toll-free 1-800-292-2550.

Approved



Kate Massey, Director
Medical Services Administration