



## Behavioral Health & Developmental Disabilities Administration Encounter Data Integrity Team Minutes

Date: July 15, 2021	Location: <a href="#">Microsoft Teams Meeting</a>
Time: 10AM-12PM	Webex: <a href="#">+1 248-509-0316 ID: 311 009 593#</a>

**Community Mental Health Service Programs**

x	Copper Country CMH: Susan Sarafini
x	Centra Wellness: Donna Nieman
x	West MI CMH: Jane Shelton
x	Integrated Services of Kalamazoo: Ed Sova
x	Newaygo: Jeff Labun/Jill McKay
x	Livingston County CMH: Kate Aulette /Laura Dobson filling in for Kate
x	Sanilac County CMHA: Beth Westover

**Community Mental Health Association**

<input type="checkbox"/>	Maggie Beckmann
x	Bruce Bridges

**Prepaid Inpatient Health Plans**

x	NCN: Joan Wallner
x	NMRE: Brandon Rhue
x	LRE: Ione Myers
x	SWMBH: Anne Wickham
x	MSHN: Amy Keinath
x	CMHPSN: Michelle Sucharski
x	DWIHN: Tania Greason/Justin Zeller filling in for Tania
x	DWIHN: Jeff White
<input type="checkbox"/>	OCHN: Jennifer Fallis
x	OCHN: Laura Aherns
x	MCCMH: Bill Adragna
x	MCCMH: Amie Norman
	Region 10: Laurie Story-Walker

**MDHHS**

x	Laura Kilfoyle
x	Kasi Hunziger
x	Kathy Haines
x	Belinda Hawks
<input type="checkbox"/>	Kim Batsche-McKenzie
<input type="checkbox"/>	Angie Smith-Butterwick
<input type="checkbox"/>	Mary Ludtke
x	Brenda Stoneburner
x	Jackie Sproat
x	Jeremy Cunningham/Spenser

Agenda Item	Presenter	Notes/Action Items
Welcome and Roll Call, membership updates (1 minute)	All	Newaygo CMH CFO Jeff Labun replacing Stacia Chick as MSHN representative.
Review and approve prior meeting minutes (5 minutes)	Jackie	Please note that the deadline for CWP change from T2023 to T1017 was 7/1/21. Jeff White curious with how others are setting the rate, DWIHN basing off similar service for HSW consumers.
Update on development of a tiered rate for licensed residential services – CLS and Personal Care (15 minutes)	Belinda	See “20210630 Tiered Rate Issue Tracking Matrix”. The rates will not start until after FY22. Belinda provided background information on the matrix document. The workgroup has been meeting every other week since last spring and has included robust discussions on multiple topics. There has been discussion about better consistency in IPOS documentation that would outline needs. Many (not all) consumers with residential services have IPOS documentation in the WSA.

T1016/T1017 (15 minutes)	Belinda	Starting FY22, T1016 (supports coordination/case management) will be discontinued, and these services will be reported using T1017 (targeted case management). This change was included in the 1915(i) waiver approved by CMS effective FY20. Providers can start using the T1017 prior to 10/1, but not use new modifiers until 10/1. The HM modifier should be used for less than bachelor's level staff. Belinda said that MPM changes planned for early 2022 to align MPM language with the approved BHDDA/CMS waivers. Planning a webinar TA in late fall to review all of these changes (in place of the usual Waiver Conference).
SFY 2022 Behavioral Health Code Sets & SFY 2022 Behavioral Health Code Charts and Provider Qualifications (15 minutes)	Jackie/Kasi	<ul style="list-style-type: none"> <li>• Final version is posted on website: <a href="https://mdhhs.michigan.gov">MDHHS - Reporting Requirements (michigan.gov)</a> Discard earlier versions attached to emails. NOTE: Update Log sheet will be used going forward to note changes, the highlighting with yellow or green will no longer be used.</li> <li>• July 26 2-4PM technical assistance session. Question about SUD: Where do peers bill when they are working toward certification? On MH side use H2015. On SUD side use? Question about SATP on Qualifications Crosswalk. The SATP credential is missing from the row 5 of the crosswalk, will be added. Question on Code Chart sheet column B FQHC G codes, these were recently implemented Medicare dual eligible services codes. Telemedicine facility fee doesn't show a line for SUD, this is an oversight that needs to be added. Question about the SFY2022 Behavioral Health Code Sets, what's the difference between the two sheets in this workbook? One sheet is intended to show the code/modifier combinations that are expected to have a cost differential.</li> <li>• Status of any outstanding items—see above.</li> </ul>
EQI Update (1 minute)	Kathy	Report was due early July. A regular EQI workgroup meeting series will be starting soon to work on the FY22 EQI workbook and instructions.
H2015 Update (5 minutes)	Jackie/Diane Bennett	<ul style="list-style-type: none"> <li>• Continue to get feedback from MALA, CMHA</li> <li>• Working with Milliman on evaluating data</li> <li>• No changes to reporting processes to update at this time.</li> </ul>

		<ul style="list-style-type: none"> <li>• H2015 Preponderance rule questions were submitted to MDHHS from Diane Bennett. We are working with OIG to review and respond.</li> </ul> <p>Regarding H2015, Diane said that Home Help (HH) workers are employed as well to provide CLS. It has been challenging to document correctly, to subtract out the HH from daily CLS services. Livingston CMH has workers deduct HH time at the end of the day. Jeff said that when auths are created HH is deducted out but entering units/claims after services are provided is a challenge. Joan said that when HH budget changes or beneficiary does not use HH on a given day (e.g., refuses to take a shower) there can be a shortage of CLS. Additional units may be added to the auth/week to account for variability. A weekly auth allows more flexibility than a daily auth.</p>
Code Chart and Provider Qualifications Chart updates & Telemedicine Update (5 minutes)	Kasi	<p>Code Chart Updates:</p> <ul style="list-style-type: none"> <li>• Children’s Waiver chart – retired T2023 monthly case management code and added T1017 15-minute code effective 6/30/21.</li> <li>• 97151 – added a note that 97151 indirect time can be reported with another service on the same day, considering that 97151 is being reported on the concluding day and may not involve in-person (direct) services with the child.</li> <li>• G2076 – added duplicate threshold.</li> <li>• G2077 – removed duplicate threshold.</li> <li>• H0001 – updated the duplicate threshold to 4 per calendar year.</li> <li>• H2014HK – in the HSW Renewal Application that was effective 10/1/19 – the limit on the duration of service was eliminated under Out of Home Non-vocational Habilitation. The State removed the limit of "four or more hours per day" from the service which would allow more flexibilities for HSW participants receiving this service. Corrected this language on page 40 and page 21 of the appendix as well.</li> <li>• S0280 – changed the units to be encounter and added language in the costing considerations that reflects that this is reimbursed once per month but to submit all encounters as they were delivered. These</li> </ul>

		<p>services are submitted with no cost, or can sent as .01 cents.</p> <p>Provider Qualifications Updates:</p> <ul style="list-style-type: none"> <li>• Added licensed and limited-licensed marriage and family therapist to the Child Mental Health Professional (CMHP) provider qualifications.</li> <li>• Added certified medical assistant (CMA) to the Medication Administration codes 96372 and 99506.</li> </ul> <p>Telemedicine - MSA and BHDDA are keeping all of our COVID-19 temporary policies in place until at least the end of the federal PHE which is currently scheduled to last until December 31, 2021. It will be after this date that we transition to the post-COVID telemedicine code chart. Laura said that there have been many rumors about an earlier or later end date, but end of 2021 is the official date most recently communicated by the federal gov.</p>
<p>97151 – any billing challenges with having to report this on the last day of service when spanning multiple days? (5 minutes)</p>	<p>Anne Wickham</p>	<p>In the past, the rule for reporting services that span multiple days was to report on the first date of service; however, recent guidance from MSA modified this to state that it should be reported on the last date of service. It was brought to our attention that this can cause an issue with the EOB from other payors. Per MSA: our interpretation of payor rules states that this should be reported on the date that the assessment activity concluded. Providers can report (in the comments) all of the days the assessment activity took place (for clarity purposes) regarding the multiple days...or if the service overlaps.</p> <p>Anne asked if any other EDIT members have had similar issues, none reported during the meeting.</p>
<p>S0215 - Non-emergency transportation (5 minutes)</p>	<p>Laurie Story-Walker</p>	<p>S0215 is used extensively for Women’s Specialty Services (WSS). Will this code expire 9/30/2021 due to changes in how transportation services are reported?</p> <p>BHDDA expectation is that an A code will be used instead. A0080 was considered to be equivalent.</p> <p>A0080 - HCPCS - vehicle provided by volunteer (individual or organization) with no vested interest.</p> <p>A0090 - HCPCS - vehicle provided by individual (family member, self, neighbor) with invested interest. Difference is that S0215 code allows an agency owned vehicle to be used. BHDDA wanted to discontinue S0215 to narrow the transportation codes and reduce duplication. Laurie requests that</p>

		S0215 continue to be used, instead of A0080 and A0090. BHDDA to discuss internally and communicate decision ASAP.
COB Subgroup (5 minutes)	Jackie/Kathy	Update from subgroup. COB workgroup met June 18, Kathy will be sending out minutes soon. Several internal meetings have occurred to clarify issues and goals around PIHP COB reporting. Next full COB group meeting scheduled for 8/3.
Transportation Subgroup (5 minutes)	Kathy	Since last EDIT meeting, several volunteered for workgroup. Meeting is scheduled for July 29 <sup>th</sup> . Agenda will be sent before end of week.
Code Chart Subgroup call for members	Kasi	Volunteers needed to review the coding and costing considerations column on the code chart.
Request to expand the availability of S5116 (non-family training)	Jackie/Jane Shelton	Request to expand S5116 (non-family training) to the 1915(i) (from Network180). Federal Compliance confirmed this service is not included in the approved 1915(i), it's currently only covered under the HSW and CWP/SEDW kid's waivers. Next steps: internal MDHHS review and update at next EDIT.
Wrap-Up and Next Steps (5 minutes)	Jackie	

Action Items	Person Responsible	Status
Internal decision and communication back out to the group on the request that S0215 continue to be used for non-emergency transportation, instead of A0080 and A0090.	Jackie	
Establish EDIT Code Chart Review subgroup.	Kasi	
S5116 – Non-family training for non-waiver beneficiaries.	Belinda	
Make updates to the FY22 Code Sets based on feedback from EDIT members.	Kasi	

**Next Meeting: October 21, 2021**