



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

Date: January 16, 2020	Location: Cass 1 North, 320 S. Walnut St., Lansing MI
	WebEx: <a href="http://www.webmeeting.att.com">http://www.webmeeting.att.com</a>

Time: 10AM-12PM	Dial-in Number: 877-336-1829,,8881705
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**Community Mental Health Service Programs**

<input checked="" type="checkbox"/>	Copper Country CMH: Susan Sarafini
<input checked="" type="checkbox"/>	Centra Wellness: Donna Nieman
<input checked="" type="checkbox"/>	West MI CMH: Jane Shelton
<input checked="" type="checkbox"/>	Integrated Services of Kalamazoo: Ed Sova
<input checked="" type="checkbox"/>	CEI CMH: Stacia Chick
<input checked="" type="checkbox"/>	Livingston County CMH: Kate Aulette
<input checked="" type="checkbox"/>	Sanilac County CMHA: Beth Westover

**Community Mental Health Association**

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

**Prepaid Inpatient Health Plans**

<input type="checkbox"/>	NCN: Joan Wallner
<input checked="" type="checkbox"/>	NMRE: Brandon Rhue
<input checked="" type="checkbox"/>	LRE: Ione Myers
<input checked="" type="checkbox"/>	SWMBH: Anne Wickham
<input checked="" type="checkbox"/>	MSHN: Amy Keinath
<input checked="" type="checkbox"/>	CMHPSN: Michelle Sucharski
<input checked="" type="checkbox"/>	DWIHN: Tania Greason
<input checked="" type="checkbox"/>	DWIHN: Jeff White
<input checked="" type="checkbox"/>	OCHN: Jennifer Fallis
<input checked="" type="checkbox"/>	OCHN: Kim Avesian
<input checked="" type="checkbox"/>	MCCMH: Bill Adragna
<input checked="" type="checkbox"/>	MCCMH: Amie Norman
<input checked="" type="checkbox"/>	Region 10: Pattie Hayes

**MDHHS**

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

Agenda Item	Presenter	Notes/Action Items
Welcome and Roll Call, membership updates (5 minutes)	All	Jeff White replaced Kim Flowers as the representative for DWIHN. Per EDIT Charter: Changes to membership must be submitted by the PIHP CEO to BHDDA for approval.
Review and approve prior meeting minutes (5 minutes)	Jackie	No changes made to 10/31/19 minutes
Code Chart and Provider Qualifications Chart updates	Kasi	Updated Code Chart posted last week: <ul style="list-style-type: none"> <li>retired codes were removed from the SEDW section, and 96130 was added</li> <li>Non-residential Opioid Treatment facility POS code: 58</li> <li>Coverage update for S5160 &amp; S5161</li> <li>G codes were added for FQHC services (see next agenda item for details)</li> </ul>

<p>FQHC encounter format and required use of G code for MDHHS prospective payments made to FQHCs</p>	<p>Kathy</p>	<p>Michigan Medicaid policy regarding use of G code coming soon. Expected effective date of 4/1/20. Technical assistance webinars to be scheduled. The process used by MDHHS to issue prospective payments to FQHC's relies on a FQHC NPI specifically used for these payments being reported on institutional encounters. Tyler Wise is the contact at MDHHS Medical Services Administration. CMHSP and PIHP data systems should have validations to ensure the correct codes are used. Ione Myers is familiar with the process. She said billing staff need to keep track of which G codes are tied to specific revenue and HCPCS codes, and that reporting both HCPCS and G code means more than one claim line for one service.</p>
<p>FY19 MUNC template</p>	<p>Kathy</p>	<p>Due 2/28/2020  Minor revisions were made, the latest versions of MUNC and HMP-UNC templates were posted on the MDHHS web site on 1/15:  <a href="https://www.michigan.gov/mdhhs/0,5885,7-339-71550_2941_38765---,00.html">https://www.michigan.gov/mdhhs/0,5885,7-339-71550_2941_38765---,00.html</a>    Click on the blue bar labeled 'PIHP and CMHSP Cost Reporting Forms'</p>
<p>Encounter Quality Initiative (EQI) FY20 template</p> <p>Jeremy Cunningham from Milliman explained the EQI PIHP and CMHSP templates and instructions. The Standard Cost Allocation Process Workgroup is working on processes to make sure the new EQI can be filled out.</p> <p>The first of three scheduled EQI reports will be due 5/31/2020 for the 10/1/19-1/31/2020 time period. See 12/5/19 Improving Outcomes EDIT <a href="#">presentation</a> for more information.</p>	<p>Jeremy Cunningham/Kathy</p>	<ul style="list-style-type: none"> <li>• PIHP and CMHSP reports both include DAB/TANF and HMP. Concerns were raised about ensuring that CMHSPs and PIHPs are not duplicating Medicaid services/costs reported. Brandon suggested that PIHPs compile Medicaid units, send to CMHSPs who add costs, then send back to PIHP to reconcile and calculate weighted average costs for the region.</li> <li>• The HCPCS codes on each sheet are a full list of all possible codes for that funding source. Milliman to update to reflect recent changes.</li> <li>• Direct run and contracted out services are to be reported separately.</li> <li>• IBNR is reported on the Other Expenses sheet, as well as expenses of operating 24-hour crisis service.</li> <li>• Spenddown services provided before monthly deductible is met would be reported on the Non-Medicaid sheet.</li> <li>• Need to have clear instructions for reporting partial grants for Medicaid beneficiaries</li> <li>• SUD Block Grant services are reported in a separate report, might be added to EQI in the future. These are not to be included in Grant rows at this time.</li> <li>• Non-benefit expense is the same as Medical Loss Ratio, intended to replace Admin Cost Report. ACR is still a requirement in SFY 2020 for cost adjuster payments.</li> </ul>

		<ul style="list-style-type: none"> <li>A CMHSP and a multi-CMH PIHP should test completing the EQI. Final EQI templates needed by 4/1/20. Kathy Haines will organize a workgroup.</li> </ul>
Psychological Testing (CPT Codes 96130-96318) and ABA Evaluation CPT Code 97151.	Amy Keinath	<p>Documents submitted by MSHN:</p> <ol style="list-style-type: none"> <li>Psychological Testing</li> <li>APA Psychological Testing Coding</li> </ol> <p>Amy explained that BHDDA Code Chart does not align with commercial insurance billing rules. BHDDA Code Chart: Indirect time currently is built into the costing for 97151. Commercial insurance billing rules allow reporting of the test interpretation time. Next step is internal MDHHS review with Milliman.</p>
Update on CLS reporting with H2015 vs. H0043	Jackie	<p>BHDDA is leaning toward use of H2015 instead of H0043. The use of TF and TG modifiers with H0043 over the past three years has not resulted in the desired level of transparency. Using FY19 as an example, the cost per unit of H0043 with no modifier (intended for lower levels of need) is \$134 while H0043TF (moderate need) is \$127. Milliman recommends H2015 for greater transparency in:</p> <ol style="list-style-type: none"> <li>resource requirements,</li> <li>unit cost variations across providers, and</li> <li>Home Help vs CLS time.</li> </ol> <p>H2016 will continue to be used only for CLS provided in a specialized residential facility.</p> <p>Question for EDIT: what do you need from us to make this effective FY21? Response: department needs to send final decision on this at least three months before the start of a new FY as many contracts and IPOS will need to be revised.</p>
Update on request to add H2011 as tele-practice treatment	Belinda Hawks	<p>BHDDA has decided not to approve H2011 for telepractice. The 90839 and 90840 codes are MDHHS approved telemedicine services. Please reference the MDHHS Medical Services <a href="#">Telemedicine database</a> for more information:</p> <p>Laura Kilfoyle said that there is a policy change drafted to allow home as a place of service for 90839 (crisis intervention).</p> <p>Belinda acknowledged that 90839 may not be the best fit when the client does not have an existing treatment relationship with the CMHSP. She will work with Brenda Stoneburner on a way to get feedback on this from CMHSPs.</p>

<p>New Medicare billing for Opioid Treatment Providers serving Medicaid/Medicare dual eligibles</p>	<p>Amy Keinath/ Kathy</p>	<p>Documents submitted by MSHN:</p> <ol style="list-style-type: none"> <li>1. Dual Eligibles – MAT Federal Rule</li> <li>2. COB guidance Feds 1.2.20</li> <li>3. Medicare OTP Rate Sheet</li> </ol> <p>See also: <a href="https://www.cms.gov/files/document/otp-billing-and-payment-fact-sheet.pdf">https://www.cms.gov/files/document/otp-billing-and-payment-fact-sheet.pdf</a></p> <p>In Michigan:</p> <ul style="list-style-type: none"> <li>• Around 16% of beneficiaries getting MAT through PIHPs (2,000) are dual enrolled.</li> <li>• About 50% of MAT providers are already Medicare enrolled.</li> <li>• Given Medicare reimbursement rates are higher than Medicaid rates, we expect the other 50% of MAT providers to pursue Medicare enrollment.</li> <li>• The new G codes include bundled services reported weekly, different from current reporting rules we have (e.g., H0020) which provide greater detail on what services were provided for how many hours each day.</li> </ul> <p>There are many issues to be worked out, and extra complications for MIHealthLink regions.</p> <p>EDIT members were asked to email Jackie with names of representatives for an EDIT Subgroup.</p>
<p>Wrap-Up and Next Steps (5 minutes)</p>	<p>Jackie</p>	

Action Items	Person Responsible	Status
<p>Send summary of NMRE's current MUNC process to Kathy (PIHP sends Medicaid units to CMHSPs who add costs and send back to PIHP).</p>	<p>Brandon Rhue</p>	
<p>Kathy will send the NMRE proposed EQI process to the group. EDIT members will send Kathy a description of their agency's current MUNC process and whether NMRE's process would work at their agency.</p>	<p>EDIT members</p>	

Encounter Quality Initiative template: workgroup and CMH/PIHP testers	Email Kathy by 1/27 if interested in participating in workgroup/testing the template: hainesk@michigan.gov	
OTP Medicare Duals workgroup	Email Jackie if interested in participating: sproatj@michigan.gov	

**Next Meeting: April 16, 2020**