

## MEDICAID POLICY INFORMATION SHEET

**Policy Analyst:** Adriena Krul-Hall

**Phone Number:** 517-284-1221

Initial ☐

Public Comment ☒

Final ☐

### Brief description of policy:

The bulletin provides updates and clarification to the billing instructions and enrollment requirements of Limited License Psychologists (LLPs), including Master's LLPs and Doctoral Educational LLPs.

### Reason for policy (problem being addressed):

LLPs are not permitted to receive direct payment for behavioral health services.

### Budget implication:

☒ budget neutral

☐ will cost MDHHS \$ , and (select one) budgeted in current appropriation

☐ will save MDHHS \$

### Is this policy change mandated per federal requirements?

No

### Does policy have operational implications on other parts of MDHHS?

Yes, changes to the enrollment procedures and billing requirements will require implementation assistance from the Provider Enrollment Unit and Medicaid Payments Division.

### Does policy have operational implications on other departments?

No

### Summary of input:

☐ controversial (Explain)

☒ acceptable to most/all groups

☐ limited public interest/comment

### Supporting Documentation:

State Plan Amendment Required: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Public Notice Required: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes, please provide status:	If yes,
<input type="checkbox"/> Approved <input type="checkbox"/> Pending <input type="checkbox"/> Denied	Submission Date:
Date: Approval	Date:

<b>DRAFT FOR PUBLIC COMMENT</b>  <b>Michigan Department of Health and Human Services</b>		
	<b>Project Number:</b> 1929-Enrollment	<b>Date:</b> October 14, 2019

**Comments Due:** November 18, 2019  
**Proposed Effective Date:** January 1, 2020  
**Direct Comments To:** Adriena Krul-Hall  
**Address:** Program Policy Division/MDHHS/MSA/CCC 7<sup>th</sup> Floor  
**E-Mail Address:** [krulhalla@michigan.gov](mailto:krulhalla@michigan.gov)  
**Phone:** 517-284-1221 **Fax:** 517-241-8969

<b>Policy Subject:</b> Updates to Limited License Psychologist Enrollment and Billing Requirements  <b>Affected Programs:</b> Medicaid, Healthy Michigan Plan, Children's Special Health Care Services, Maternity Outpatient Medical Services  <b>Distribution:</b> 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  <b>Summary:</b> This bulletin provides updates to the billing instructions and enrollment requirements of Limited License Psychologists (LLPs), including Master's LLPs and Doctoral Educational LLPs.  <b>Purpose:</b> LLPs are not permitted to receive direct payment for behavioral health services.  <b>Cost Implications:</b> Budget neutral.  <b>Potential Hearings &amp; Appeal Issues:</b> Aware of none.
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<b>State Plan Amendment Required:</b> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <b>If yes, date submitted:</b>	<b>Public Notice Required:</b> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <b>Submitted date:</b>
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<b>Tribal Notification:</b> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> - <b>Date:</b>
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<b>THIS SECTION COMPLETED BY RECEIVER</b>
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<input type="checkbox"/> <b>Approved</b>	<input type="checkbox"/> <b>No Comments</b>
<input type="checkbox"/> <b>Disapproved</b>	<input type="checkbox"/> <b>See Comments Below</b>
	<input type="checkbox"/> <b>See Comments in Text</b>

<b>Signature:</b>	<b>Phone Number</b>
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<b>Signature Printed:</b>
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<b>Bureau/Administration</b> <i>(please print)</i>	<b>Date</b>
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# Proposed Policy Draft

Michigan Department of Health and Human Services  
Medical Services Administration

**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:** December 1, 2019 (Proposed)

**Subject:** Updates to Limited License Psychologist Enrollment and Billing Requirements

**Effective:** January 1, 2020 (Proposed)

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

This bulletin notifies providers of changes to the enrollment of Master's Limited License Psychologists (LLPs) and Doctoral Educational LLPs. This bulletin also updates information related to the billing of services provided by these providers. Information in this policy is effective January 1, 2020.

## **Enrollment of LLPs**

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. Individuals holding Temporary Master's Educational Limited Licenses are not eligible to enroll as Medicaid providers.

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 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 a billing provider within CHAMPS.

All other current provider qualifications, including licensing requirements, remain unchanged.

## **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 as a "Licensed Psychologist" 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 “Limited License Psychologist” specialty before December 31, 2019. This specialty reassignment does not require managed care only providers to participate with the Medicaid Fee-for-Service program.

LLPs currently enrolled as individual sole proprietors within CHAMPS will be automatically reassigned by MDHHS to a rendering only provider type. LLPs without a current billing provider designation will be contacted by MDHHS Provider Enrollment staff before December 31, 2019 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 enrolled with the program for payment and be designated by December 31, 2019 in order to avoid claim denials.

### **Billing and Reimbursement for LLP Services**

The Medicaid program covers medically necessary psychology services performed by a Medicaid-enrolled LLP, as defined in §18201 of Public Act 368 of 1978. Covered services must be completed under the supervision of a Medicaid enrolled, fully licensed psychologist and are not eligible for direct reimbursement by Medicaid. Reimbursement will be made to the LLP’s associated billing provider. The billing provider must have a Group NPI and be enrolled with the Medicaid program for payment.

For dates of service on and after January 1, 2020, Master’s LLPs and Doctoral Educational LLPs should no longer bill for services under their supervising psychologist’s NPI. Professional claims must include the NPI of the LLP in the Rendering Provider field and the NPI of the supervising psychologist in the Supervising Provider field. Claims submitted without the required NPIs may be denied.

Services performed by Temporary Master’s Educational LLPs should continue to be billed under the supervising psychologist. The supervising psychologist must be listed as the Rendering Provider on these claims.

For beneficiaries enrolled in a Medicaid Health Plan or Integrated Care Organization, the provider must check with the beneficiary’s health plan for claim completion information.

Refer to the Michigan Medicaid Practitioner fee schedule published at [www.michigan.gov/medicaidproviders](http://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.