

MEDICAID POLICY INFORMATION SHEET

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Initial

Public Comment

Final

Brief description of policy:

The bulletin provides for Medicaid coverage and reimbursement of behavioral health services performed by graduates of a Master’s or Doctoral-level educational training program for psychology, social work, counseling, or marriage and family therapy who have completed all the requirements for a limited, educational, or temporary license but have not obtained a license. Graduates must be supervised by a Medicaid-enrolled, fully licensed provider of the same profession, and services must be billed under supervisor’s National Provider Identifier (NPI).

Reason for policy (problem being addressed):

Medicaid allows behavioral health student interns and educational temporary limited licensees to perform services, but there is no coverage or reimbursement for individuals who fall between these two categories. This gap impacts the Community Mental Health Services Program’s (CMHSP) and Prepaid Inpatient Health Plan’s (PIHPs) ability to hire and utilize graduates for service delivery.

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?

No

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, Submission Date:
<input type="checkbox"/> Approved <input type="checkbox"/> Pending <input type="checkbox"/> Denied	
Date: Approval Date:	

DRAFT FOR PUBLIC COMMENT Michigan Department of Health and Human Services		
	Project Number: 2241-BH	Date: October 20, 2022

Comments Due: November 23, 2022
Proposed Effective Date: January 1, 2023
Direct Comments To: Adriena Krul-Hall
Address:
E-Mail Address: Krulhalla@michigan.gov
Phone: 517-284-1221 **Fax:**

Policy Subject: Medicaid Coverage of Services Performed by Behavioral Health Program Graduates

Affected Programs: Medicaid, Healthy Michigan Plan, MICHild, and Children’s Special Health Care Services

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, Integrated Care Organizations, Tribal Health Centers

Summary: This bulletin provides for Medicaid coverage and reimbursement of behavioral health services performed by graduates of a Master’s or Doctoral-level educational training program for psychology, social work, counseling, or marriage and family therapy who have completed all the requirements for a limited, educational, or temporary license but have not obtained a license. Graduates must be supervised by a Medicaid-enrolled, fully licensed provider of the same profession, and services must be billed under supervisor's National Provider Identifier (NPI).

Purpose: The expansion of provider types allowed to serve Medicaid beneficiaries will increase beneficiary access to behavioral health services and assist with reducing the behavioral health provider shortage.

Cost Implications: Budget neutral.

Potential Hearings & Appeal Issues: Aware of none.

State Plan Amendment Required: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, date submitted:	Public Notice Required: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Submitted date:
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Tribal Notification: Yes No - **Date:**

THIS SECTION COMPLETED BY RECEIVER

<input type="checkbox"/> Approved	<input type="checkbox"/> No Comments
<input type="checkbox"/> Disapproved	<input type="checkbox"/> See Comments Below
	<input type="checkbox"/> See Comments in Text

Signature:	Phone Number
Signature Printed:	
Bureau/Administration <i>(please print)</i>	Date

Comment001

Revised 6/16

Proposed Policy Draft

Michigan Department of Health and Human Services
Behavioral & Physical Health and Aging 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, Integrated Care Organizations, Tribal Health Centers

Issued: December 1, 2022 (Proposed)

Subject: Medicaid Coverage of Services Performed by Behavioral Health Program Graduates

Effective: January 1, 2023 (Proposed)

Programs Affected: Medicaid, Healthy Michigan Plan, Maternity Outpatient Medical Services (MOMS), MICHild, Children's Special Health Care Services (CSHCS)

The policy applies to Medicaid Fee-for-Service (FFS) beneficiaries. For beneficiaries enrolled in a Medicaid Health Plan (MHP), Integrated Care Organization (ICO), or receiving behavioral health specialty services and supports through the Pre-Paid Inpatient Health Plan (PIHP)/Community Mental Health Services Program (CMHSP) benefit, the provider must check with the beneficiary's health plan or PIHP/CMHSP for provider credentialing requirements, enrollment allowances, and billing instructions.

The purpose of this bulletin is to expand the providers allowed to perform Medicaid-covered non-physician outpatient behavioral health services.

For dates of service on or after January 1, 2023, Medicaid will cover and reimburse outpatient behavioral health services provided by graduates of a Master's or Doctoral-level educational training program for psychology, social work, counseling, or marriage and family therapy who have completed all the requirements for a limited, educational, or temporary license but have not obtained a license from the Michigan Department of Licensing and Regulatory Affairs (LARA). Graduates must be supervised (as defined under Section 333.16109 of the Public Health Code [PA 368 of 1978]) by a Medicaid-enrolled, fully licensed provider of the same profession and are not eligible to enroll or be directly reimbursed by Medicaid. Services must be billed to Medicaid under the National Provider Identifier (NPI) of the supervising provider.

All other non-physician behavioral health provider requirements remain unchanged. Medicaid continues to cover outpatient behavioral health services performed by a Licensed Psychologist, Social Worker, Marriage and Family Therapist, Professional Counselor, Limited

Licensed Psychologist, or Temporary Educational Limited Licensees and student interns in these fields when supervised by a Medicaid-enrolled, fully licensed provider of the same profession. (Refer to the Behavioral Health and Intellectual Developmental Disability Supports and Services chapter of the [Michigan Department of Health and Human Services \[MDHHS\] Medicaid Provider Manual](#), Non-Physician Behavioral Health Appendix, for additional policy and coverage information.)

Specialty behavioral health services and supports covered by the PIHPs/CMHSPs are available and reimbursed through the PIHP/CMHSP. (Refer to the Behavioral Health and Intellectual and Developmental Disability Supports and Services chapter of the MDHHS Medicaid Provider Manual for additional information on these services.)