

MEDICAID POLICY INFORMATION SHEET

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Initial

Public Comment

Final

Brief description of policy:

This bulletin establishes policy regarding telepractice for behavioral health services provided within the Caring 4 Students (C4S) and School Based Services (SBS) programs.

Reason for policy (problem being addressed):

There is currently a shortage of behavioral health providers within the state. This policy will help ensure that behavioral health concerns in the schools can be addressed more adequately.

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?

Yes – the Michigan Department of Education

Summary of input:

controversial

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: 2005-SBS	Date: March 4, 2020

Comments Due: April 8, 2020
Proposed Effective Date: July 1, 2020
Direct Comments To: Kevin Bauer
Address: MDHHS/MSA/Program Policy Division/CCC 7th Floor
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Policy Subject: Behavioral Health Telepractice Affected Programs: School-Based Services, Caring 4 Students Distribution: School-Based Services and Caring for Students Providers Summary: This policy allows telepractice for behavioral health services for the School Based Services and Caring 4 Students programs. Purpose: To establish behavioral health telepractice in the school setting Cost Implications: Budget neutral Potential Hearings & Appeal Issues: 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 <input type="checkbox"/> No <input checked="" type="checkbox"/> - 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
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Signature Printed:

Bureau/Administration <i>(please print)</i>	Date
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Proposed Policy Draft

Michigan Department of Health and Human Services
Medical Services Administration

Distribution: School-Based Services and Caring 4 Students Providers

Issued: June 1, 2020 (Proposed)

Subject: Behavioral Health Telepractice

Effective: July 1, 2020 (Proposed)

Programs Affected: School-Based Services, Caring 4 Students

The purpose of this bulletin is to establish policy regarding telepractice for behavioral health services provided within the Caring 4 Students (C4S) and School Based Services (SBS) programs. This policy is effective for dates of services on or after July 1, 2020.

Background – General Telemedicine Policy

The Michigan Department of Health and Human Services (MDHHS) has established the following definition for telemedicine, which is also applicable to telepractice:

Telemedicine is the use of telecommunication technology to connect a beneficiary with a Medicaid-enrolled health care professional in a different location. MDHHS requires a Health Insurance Portability and Accountability Act of 1996 (HIPAA)-compliant real time interactive system at both the originating (student location) and distant (provider location) sites, allowing instantaneous interaction between the student and practitioner via the telecommunication system. The technology used must meet the needs for audio and visual compliance in accordance with state and federal standards. Practitioners must ensure the privacy of the student and the security of any information shared via telemedicine.

When providing services via telemedicine, sufficient privacy and security measures must be in place and documented to ensure confidentiality and integrity of student-identifiable information. Transmissions, including student e-mail and prescriptions, must be secure within existing technology (i.e., password protected, encrypted electronic prescriptions, or other reliable authentication techniques). All student-provider e-mail, as well as other student-related electronic communications, should be stored and filed in the student's record, consistent with traditional recordkeeping policies and procedures. Refer to the General Information for Providers chapter of the Medicaid Provider Manual for complete HIPAA compliance requirements. The Michigan Medicaid Provider Manual is available on the MDHHS website at www.michigan.gov/medicaidproviders >> Policy, Letters & Forms.

Telepractice specifically applies to the SBS and C4S programs that also have the following requirements:

- Providers of telepractice services must be currently licensed in the state of Michigan as behavioral health providers and must act within their scope of practice when providing services. Telepractice services must be provided by a fully licensed or credentialed behavioral health professional, or by a practitioner who holds a limited license and is under the direction of an enrolled, fully licensed provider of the same profession.
- It is the expectation that providers, facilitators and staff involved in telepractice are trained in the use of equipment and software prior to servicing students. Behavioral health services administered by telepractice are subject to the same provisions as services provided to a student in person, including all facets of service outlined in applicable Current Procedural Terminology (CPT)/Healthcare Common Procedure Coding System (HCPCS) codes. A facilitator must be physically present at the originating site during the entire telepractice session to assist the student at the direction of the behavioral health professional.
- Allowable telepractice originating sites include the school, the student's home, or any other established site deemed appropriate by the provider. It must be a room free from distractions so as not to interfere with the telepractice session.

Refer to the Michigan Medicaid Provider Manual, School Based Services chapter, Psychological, Counseling and Social Work Services section for complete coverage information.

Billing Instructions

Telepractice services must be submitted using the same procedure codes as services rendered to a patient who is physically present. In addition to the procedure code, billers are required to use the GT—interactive telecommunication modifier to identify services provided via telepractice. Refer to the SBS fee schedule on the MDHHS website at www.michigan.gov/medicaidproviders >> Billing & Reimbursement >> Provider Specific Information >> School Based Services for a complete listing of procedure codes applicable to SBS and C4S beneficiaries.