

MEDICAID POLICY INFORMATION SHEET

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Initial

Public Comment

Final

Brief description of policy:

The purpose of this policy is to update prior authorization (PA) and prescription signature requirements for non-routine therapy services provided to Medicaid beneficiaries residing in a skilled nursing facility. MDHHS will remove the PA requirement for non-routine therapy services provided to Medicaid beneficiaries residing in a skilled nursing facility within 60 days of their admission to the facility.

Reason for policy (problem being addressed):

Stakeholders have indicated that there is currently a delay in obtaining non-routine therapy services that would allow a beneficiary to retain vital functionality.

Budget implication:

budget neutral

will cost MDHHS \$ 637,000, and is 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Public Notice Required: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please provide status:	If yes,
<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Pending <input type="checkbox"/> Denied	Submission Date:
Date: 1/1/23 Approval Date:	

DRAFT FOR PUBLIC COMMENT Michigan Department of Health and Human Services		
	Project Number: 2304-NF	Date: April 3, 2023

Comments Due: May 8, 2023
Proposed Effective Date: July 1, 2023
Direct Comments To: Emily Frankman, PhD
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<p>Policy Subject: Change in Non-Routine Therapy Prior Authorization (PA) Requirements for Medicaid Beneficiaries Residing in a Nursing Facility</p> <p>Affected Programs: Medicaid, Healthy Michigan Plan</p> <p>Distribution: Nursing Facilities, Hospitals</p> <p>Summary: The purpose of this policy is to update PA and prescription signature requirements for non-routine therapy services provided to Medicaid beneficiaries residing in a skilled nursing facility. MDHHS will remove the PA requirement for non-routine therapy services provided to Medicaid beneficiaries residing in a skilled nursing facility within 60 days of their admission to the facility.</p> <p>Purpose: Stakeholders have indicated that there is currently a delay in obtaining non-routine therapy services that would allow a beneficiary to retain vital functionality.</p> <p>Cost Implications: \$637,000 (FY23 and FY24)</p> <p>Potential Hearings & Appeal Issues:</p>

State Plan Amendment Required: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, date submitted: 12/19/22 (ABP SPA 22-1004)	Public Notice Required: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Submitted date:
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Tribal Notification: Yes No - **Date:** 9/26/22 (L 22-27)

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
Behavioral & Physical Health and Aging Services Administration

Distribution: Nursing Facilities, Hospitals

Issued: June 1, 2023 (Proposed)

Subject: Change in Non-Routine Therapy Prior Authorization (PA) Requirements for Medicaid Beneficiaries Residing in a Nursing Facility

Effective: July 1, 2023 (Proposed)

Programs Affected: Medicaid, Healthy Michigan Plan

The purpose of this policy is to update PA and prescription signature requirements for non-routine therapy services provided to Medicaid beneficiaries residing in a skilled nursing facility. This change is expected to remove significant hurdles to beneficiaries obtaining services that may allow them to regain or retain crucial functionality while residing in a skilled nursing facility.

PA Requirement

MDHHS will remove the PA requirement for non-routine therapy services provided to Medicaid beneficiaries residing in a skilled nursing facility within 60 days of their admission to the facility. Non-routine therapies refer to the occupational therapy (OT), physical therapy (PT), and speech therapy (ST) services that are covered separately from the per diem rate. Providers must obtain PA for any non-routine therapy services that are provided after the initial 60-day post-admission period. This includes new episodes of therapy or continuations of therapy already in progress. PA is required for all therapy provided after day 60 regardless of the amount of therapy performed during the admission period. Re-authorizations are required every 60 days.

This change only applies to new admissions to a nursing facility. Subsequent emergency or planned hospitalizations do not impact the requirements for PA. A copy of the physician prescription or documented clearance to resume therapy must be retained in the beneficiary's medical record.

Prescription Signature Requirement

MDHHS will also change the prescription signature requirements for non-routine therapy services rendered to Medicaid beneficiaries residing in a skilled nursing facility to align with outpatient and private practice therapy signature requirements. This change will expand the pool of providers who can sign the non-routine therapy prescription for a nursing facility resident from a physician only to a physician or other licensed practitioner practicing within their scope of practice as defined in State law for occupational therapy, physical therapy, and speech-language therapy.