

Affected Programs: BadgerCare Plus, Medicaid

To: Advance Practice Nurse Prescribers with Psychiatric Specialties, Intensive In-Home Mental Health and Substance Abuse Treatment Services for Children Providers, Master's-Level Psychotherapists, Outpatient Mental Health Clinics, Outpatient Substance Abuse Clinics, Psychologists, Qualified Treatment Trainees, Substance Abuse Counselors, School-Based Services Providers, HMOs and Other Managed Care Programs

Policy Changes for Clinics and Independent Providers for Mental Health Services Provided in a School

This *ForwardHealth Update* announces policy changes for mental health clinics and independent mental health providers for mental health services provided in schools. These policy changes do not affect services billed directly by schools or school districts through the school-based services benefit. These policy changes are made in accordance with 2015 Wisconsin Act 294.

Change for Mental Health Clinics

Effective April 1, 2016, mental health clinics certified by the Division of Quality Assurance (DQA) under Wis. Admin. Code ch. DHS 35 are no longer required to designate school sites at which they provide outpatient mental health services as branch offices. As a result, mental health clinics seeking initial certification or recertification are no longer required to include a branch office application for school sites with their certification or recertification application. However, the DQA will continue to certify school sites as branch offices if requested by a mental health clinic.

All other branch office certification policy remains unchanged. The requirements for mental health clinic certification are described on the Certified Outpatient Clinic Request for a Branch Office form, F-00191 (11/09) available on the Wisconsin Department of Health Services website at www.dhs.wisconsin.gov/library/F-00191.htm.

2015 Wisconsin Act 294 does not alter requirements for branch office designation if a certified clinic provides substance abuse treatment services in a school setting.

All other existing policies and requirements for outpatient mental health services remain in effect, including coordination of benefits with other insurance, enrollment of the rendering Medicaid-enrolled provider, and prior authorization (PA) requirements. Furthermore, 2015 Wisconsin Act 294 does not include any changes to regulations regarding school operation. Mental health clinics must continue to comply with requirements established by school districts and the Department of Public Instruction.

Change for Independent Mental Health Providers

Effective April 1, 2016, Wisconsin Medicaid reimburses the following types of independent mental health providers for mental health services provided within a school setting:

- Licensed psychiatrists
- Licensed advanced practice nurse prescribers with a psychiatric specialty
- Licensed psychologists
- Licensed clinical social workers
- Licensed marriage and family therapists

- Licensed professional counselors

Independent mental health providers should submit claims for outpatient mental health services provided in schools using the Medicaid provider enrollment under which they otherwise bill. These providers are not required to be employed by or work within a certified mental health clinic.

2015 Wisconsin Act 294 also impacts advanced practice social workers and independent social workers. These two types of providers are not addressed in this *ForwardHealth Update*, and any changes to ForwardHealth policy for these two types of providers will be announced in a future *Update*.

All other existing coverage policies for outpatient mental health services remain in effect, including coordination of benefits with other insurance, enrollment of the rendering Medicaid provider, and PA requirements. Furthermore, 2015 Wisconsin Act 294 does not include any changes to regulations regarding school operation. Independent mental health professionals must continue to comply with requirements established by school districts and the Department of Public Instruction.

Claims Submission

The policy changes for certified mental health clinics and independent mental health providers delivering mental health services in schools are effective April 1, 2016. If providers are unable to submit claims by the timely filing deadline, they should request an exception. To request an exception, submit a completed Timely Filing Appeals Request form, F-13047 (08/15) for the claim. In the box at the bottom of the Timely Filing Appeals Request form, enter “Resubmission for School Mental Health Processing (*Update* 2017-05).” Exceptions must be requested within 90 days of the timely filing submission deadline.

Note: If the claim is being submitted on paper, attach the Timely Filing Appeals Request form to the paper claim and include the Explanation of Medical Benefits form, F-01234 (11/14), if applicable.

Clarification of “Free Care” Rule Guidance

The Centers for Medicare and Medicaid Services has issued new guidance for the “Free Care” Rule that allows Medicaid providers to be reimbursed for medically necessary Medicaid-allowable services provided to BadgerCare Plus and Medicaid members, even if the services are provided free of charge to non-Medicaid members. Providers must continue to follow existing coverage policies for these services including coordination of benefits with other insurance, provider enrollment, and PA.

This guidance may create additional opportunities for healthcare providers to coordinate with school districts and develop innovative programs to provide treatment to children in schools. The guidance **does not change** the type or amount of services available through the school-based services benefit, through which Medicaid directly reimburses the school or school district for the delivery of covered services listed in a child’s Individualized Education Program.

Information Regarding Managed Care Organizations

This *Update* contains fee-for-service policy and applies to services members receive on a fee-for-service basis only. For managed care policy, contact the appropriate managed care organization. Managed care organizations are required to provide at least the same benefits as those provided under fee-for-service arrangements.

The *ForwardHealth Update* is the first source of program policy and billing information for providers.

Wisconsin Medicaid, BadgerCare Plus, SeniorCare, and Wisconsin Chronic Disease Program are administered by the Division of Medicaid Services, the Wisconsin Department of Health Services (DHS). The Wisconsin AIDS Drug Assistance Program and the Wisconsin Well Woman Program are administered by the Division of Public Health, DHS.

For questions, call Provider Services at 800-947-9627 or visit our website at www.forwardhealth.wi.gov/.

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