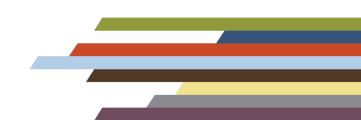


Medicaid Managed Care and School Mental Health

Presenter: Adam S. Wilk, Ph.D. Moderator: Kellay Chapman School Mental Health Initiative Southeast Mental Health Technology Transfer Center (MHTTC) Rollins School of Public Health, Emory University May 9, 2024





Disclosure/Disclaimer

The Southeast Mental Health Technology Transfer Center (MHTTC) Administrative Supplement is funded by Substance Abuse and Mental Health Services Administration (SAMHSA)

The opinions expressed herein are the views of the presenters and do not reflect the official position of the Department of Health and Human Services (DHHS), SAMHSA. No official support or endorsement of DHHS, SAMHSA, for the opinions described in this document is intended or should be inferred.



Southeast Mental Health Technology Transfer Center

Alabama | Florida | Georgia | Kentucky | Mississippi | North Carolina | South Carolina | Tennessee

About the Southeast Mental Health Technology Transfer Center (MHTTC)

The Southeast MHTTC is located at the Rollins School of Public Health, Emory University.

Serve states in HHS Region IV: Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee.

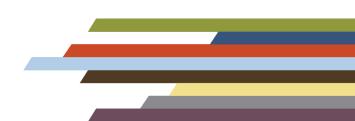


Our Mission: To promote the implementation and sustainability of evidence-based mental health services in the Southeastern United States.

Our Vision: Widespread access to evidence-based mental health services for those in need.







Presenter

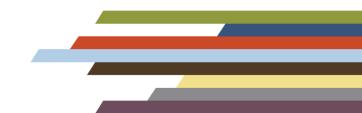


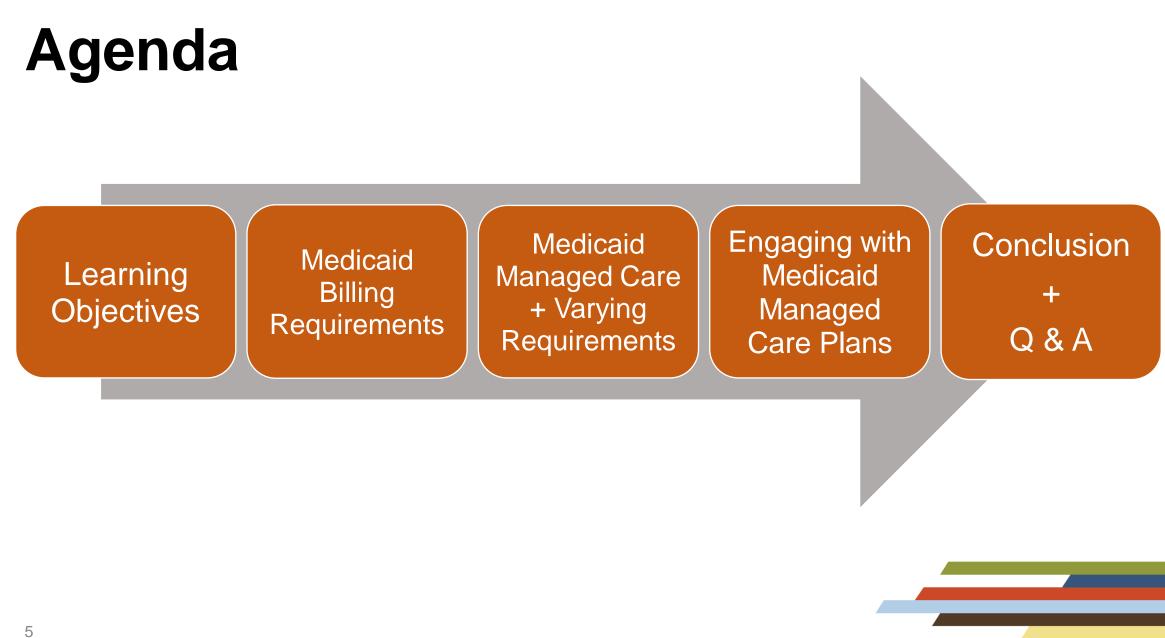
Dr. Adam Wilk

Deputy Director & Policy Lead Southeast MHTTC School Mental Health Initiative

Associate Professor

Department of Health Policy and Management, Rollins School of Public Health, Emory University





Learning Objectives

Specify the requirements that must be met in order to bill Medicaid or Medicaid Managed Care plans for school mental health services.



Discuss ways in which these requirements may vary across states as well as, within a given state, across Medicaid Managed Care plans.

3

Describe opportunities to learn about the Medicaid Managed Care plans in your state and how to meet their requirements to pay for school mental health services.



Southeast (HHS Region 4)

Mental Health Technology Transfer Center Network Funded by Substance Abuse and Mental Health Services Administration

POLL QUESTION #1



Southeast (HHS Region 4)

Mental Health Technology Transfer Center Network Funded by Substance Abuse and Mental Health Services Administration

POLL QUESTION #2



MEDICAID AND SCHOOL MENTAL HEALTH SERVICES: FAQS



| U-CHEN HU, MHSA, ADAM S. WILK, PHD, | |
|---|--|
| ANET R. CUMMINGS, PHD | |
| OUTHEAST MENTAL HEALTH TECHNOLOGY TRANSFER CENTER OLLINS SCHOOL OF PUBLIC HEALTH, EMORY UNIVERSITY, TLANTA, GEORGIA | |
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Medicaid and School Mental Health Services: FAQs

In this report, we discuss how schools can finance school mental health services through Medicaid by answering some frequently asked questions.

More resources and details on Medicaid financing for school mental health services can be found in this FAQs report.

Background | What is Medicaid Managed Care (MMC)?

Medicaid is the largest payer for behavioral health services in the US and is a major payer for school mental health services.

As of July 2022, nationwide 39 states (+ DC) enrolled at least some children in a Medicaid Managed Care (MMC) plan

In these states, **MMC is the dominant source of coverage**: at the median, 94% of Medicaid-enrolled children are in a MMC plan

This means their benefits are administered by a commercial insurance plan, under contract with the state, rather than by the state directly.

Source: Kaiser Family Foundation (July 1, 2022 data)

Background | Key nuances of coverage through MMC plans

There are usually **multiple MMC plans per state**. In the Southeast, US there are between 3 and 11 plans per state.

• 2-5 plans within a given region

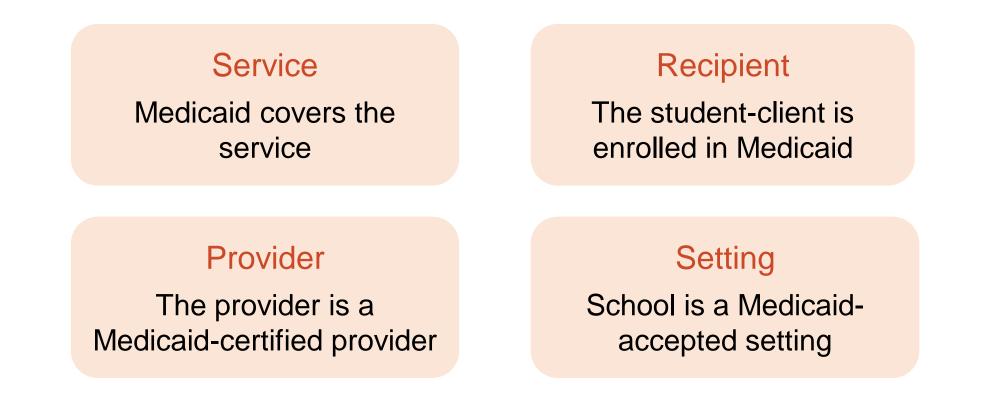
Twelve states (36%) have "carved out" at least some outpatient specialty mental health services from MMC contracts (July 2022 survey)

This means the benefits are administered by a different entity than the primary MMC plan:

- By the state
- By a specialized behavioral health managed care company

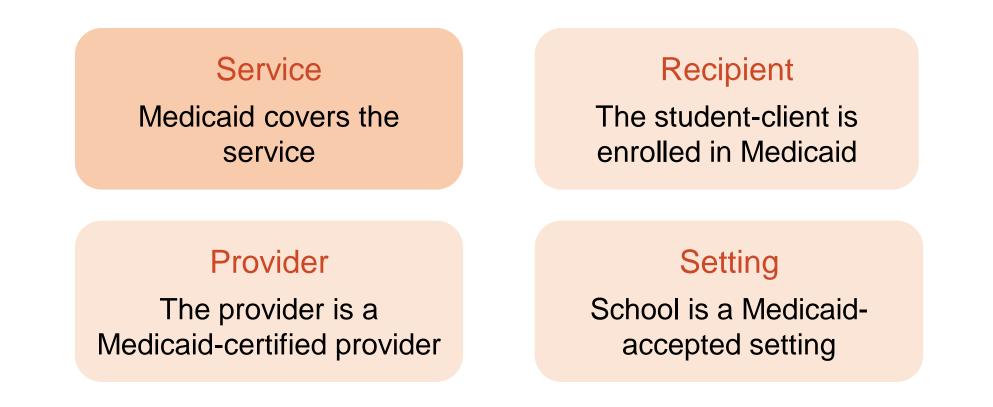
11 Source: <u>Kaiser Family Foundation (July 2022 survey)</u>

Overview | Four Requirements for seeking Medicaid reimbursement for school mental health services



*For each requirement, key terms vary by state.

Overview | Four Requirements for seeking Medicaid reimbursement for school mental health services



*For each requirement, key terms vary by state.

Medicaid can pay for direct services and associated expenses of some administrative services

Direct Services

- Mandatory Services

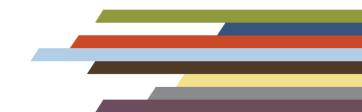
 E.g., EPSDT
- Optional Services

 E.g., Telehealth

Administrative Services

- Administrative supports for direct services
- Outreach and enrollment services

EPSDT: Early and Periodic Screening, Diagnostic, and Treatment

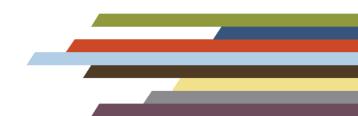


Varies by state: Since not all services are mandatory (to be covered), different states cover different services.

Where to look: State Medicaid websites usually have a section listing "covered services" or "Medicaid benefits."

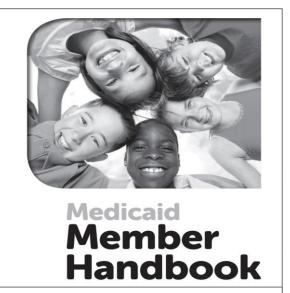
• May be a website section intended to inform providers

Fine print: Some services may be covered only when billed with certain diagnosis codes listed.



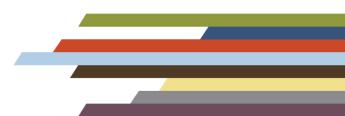
Where to look -- Examples: Florida and South Carolina





south carolina department of health and human services Healthy Connections MEDICAID

Better Care. Better Value. Better Health

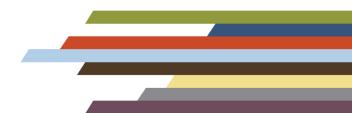


Varies by Medicaid Managed Care plan: Terms of coverage

Example: psychotherapy services and assessment

- Initial services may be covered <u>with referral</u>; sometimes requiring <u>prior</u> <u>authorization</u>
- Covered up until a fixed <u>benefit "cap"</u>
- Coverage may be extended above the cap if the provider obtains <u>re-authorization</u>

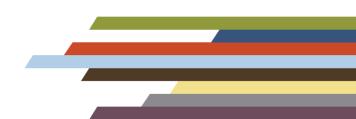
Plans may give little notice before making changes to coverage terms



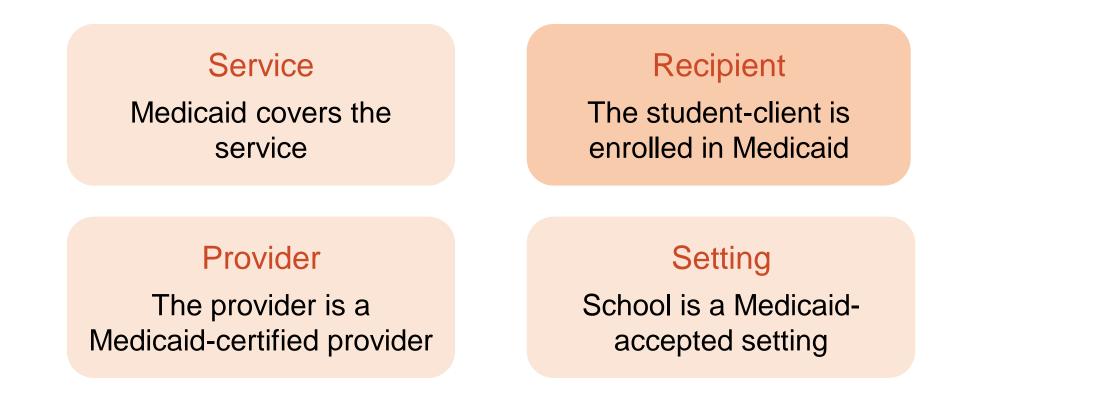
Varies by Medicaid Managed Care plan: Terms of coverage

If there are 2-5 plans enrolling Medicaid beneficiaries in a given area...

> 2-5 sets of coverage terms to be familiar with



Overview | Four Requirements for seeking Medicaid reimbursement for school mental health services



*For each requirement, key terms vary by state.

Requirement 2 | The student-client is enrolled in Medicaid

Medicaid is an <u>entitlement program</u>: Whoever meets the <u>eligibility criteria</u> has the right to enroll

- Categorical eligibility: An individual must be in an eligibility group
 - Mandatory categories (required by federal regulations)
 - Optional categories (state decides whether to cover)
- Income limit: The individual's household income must be below a specified income limit that is associated with the eligibility category
 - Federal regulations establish minimum household income limits for each eligibility category.
 - States may choose to set higher income limits.

Requirement 2 | The student-client is enrolled in Medicaid

Varies by state: Since not all eligibility categories are mandatory and income limits are minimums, different states cover different populations at different income levels

Where to look: State Medicaid websites usually have a section with terms of eligibility and links to apply for coverage

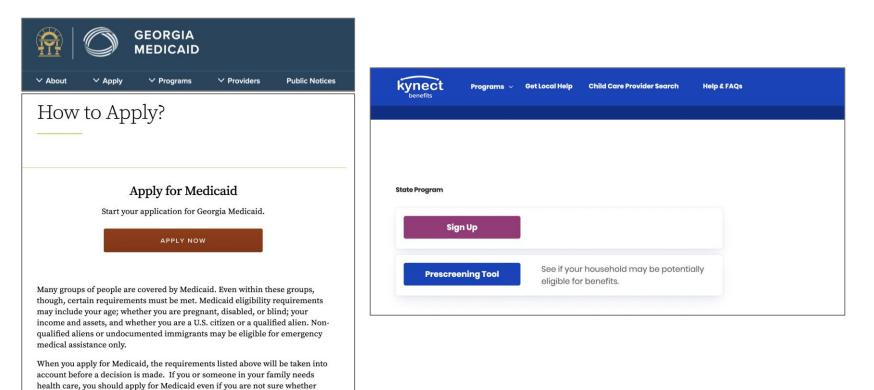
Fine print: Some individuals may retain coverage only with eligibility recertification every 12 months (or more often)*

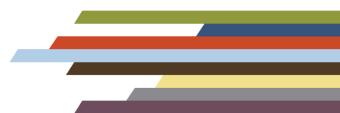
* Changed under the COVID-19 Public Health Emergency



Requirement 2 | The student-client is enrolled in Medicaid

Where to look -- Examples: Georgia and Kentucky





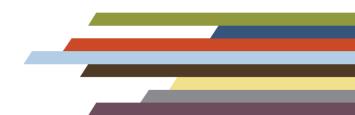
you qualify or if you have been turned down in the past.

Requirement 2 The student-client is enrolled in Medicaid

Eligibility rules do not vary by Medicaid Managed Care plan

Notable enrollment rules within Medicaid Managed Care (MMC): in some states, beneficiaries may be enrolled in a MMC plan...

- From initial enrollment (automatically)
- If the beneficiary does not select a plan from among those offered
- Voluntarily (versus enrolling in state-administered "fee-for-service" Medicaid)



Overview | Four Requirements for seeking Medicaid reimbursement for school mental health services

Service Medicaid covers the service

Recipient

The student-client is enrolled in Medicaid

Provider

The provider is a Medicaid-certified provider

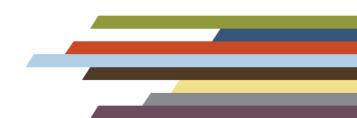
Setting

School is a Medicaidaccepted setting

*For each requirement, key terms vary by state.

Providers are required to be **Medicaid-certified** to receive Medicaid reimbursement.

- Must meet the state's licensure/certification requirements
- Must complete application



Varies by state: In different states, different types of providers may be eligible to become Medicaid-certified

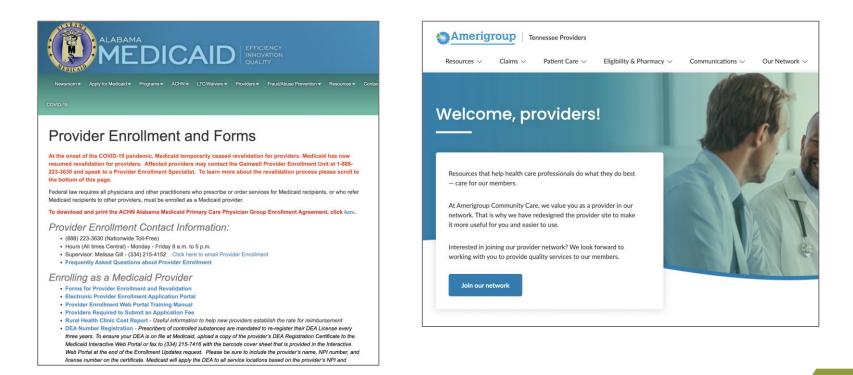
Where to look: State Medicaid websites usually have a section describing terms of certification and providing a link for providers to seek certification

• Example: Medicaid Managed Care plans may also perform this function

Fine print: Some services can be billed to Medicaid only when provided by certain Medicaid-certified provider types

• Example: licensed <u>clinical</u> social workers (vs. non-clinical)

Where to look -- Examples: Alabama and Tennessee

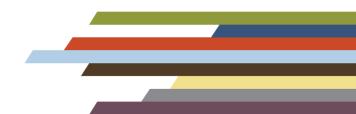


Varies by Medicaid Managed Care plan: Providers' in-network status

Like other commercial insurers, Medicaid Managed Care plans...

Negotiate fee schedules

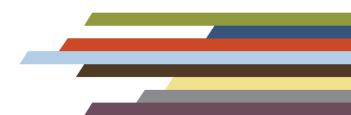
- > Do not use standard Medicaid fee schedule
- Make determinations on network inclusion (or exclusion)
 - Not all providers who "accept Medicaid patients" are in-network for a given MMC plan

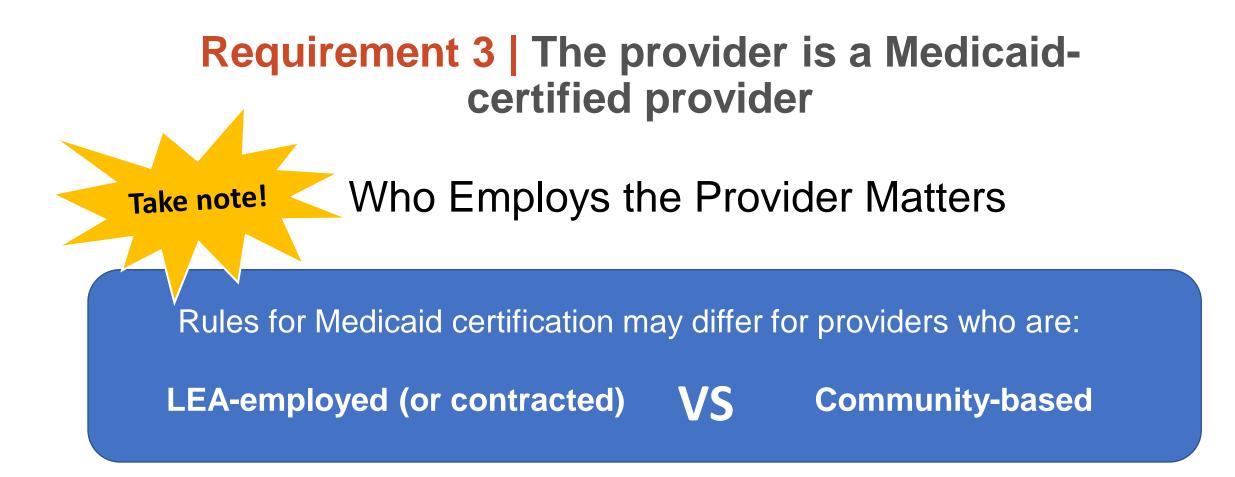


Varies by Medicaid Managed Care plan: Providers' in-network status

If there are 2-5 plans enrolling Medicaid beneficiaries in a given area...

- Providers may be in-network with one plan, but not another; innetwork status may change over time
- > Providers may enter negotiations with all local plans annually

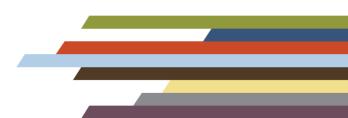




• State rules and individual MMC plans' rules may prohibit LEAemployed (or contracted) mental health providers from becoming Medicaid-certified or billing for certain services.



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| Home > Providers > Member care > School Based Mental Health Initiative | | | | | | | | |
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| Providers | Sch | nool Ba | sed Me | ental H | lealth li | nitiative | | |
| Self-service tools | 501 | | | | | Inclucive | | |
| Prior authorizations | | In accordance with the South Carolina Department of Health and Human Services (SCDHHS) School-based Mental Health Initiative, effective July 1, 2022: | | | | | | |
| Prior authorization look tool | | Rehabilitative Behavioral Health Services (RBHS) are allowed to be delivered in school settings by Select Health | | | | | | |
| | of South | of South Carolina master's level behavioral health providers, who are contracted by the school district. We have | | | | | | |
| Resources | summari | summarized the guidelines here; however, providers are advised to review the recently updated SCDHHS Local | | | | | | |
| Newsletters and updates | S | Education Agencies (LEA) Services Provider Manual, the LEA School-based Services Alternative Fee Schedule (PDF) and Frequently Asked Questions (FAQ) document located on the SCDHHS School-based Mental Health | | | | | | |
| Pharmacy services | Services | Services webpage for full details. | | | | | | |
| Member care | South Ca | South Carolina school districts will be free to choose to: | | | | | | |
| Behavioral health | • Cont | • Continue to utilize the South Carolina Department of Mental Health (DMH) by contracting with DMH, who | | | | | | |
| Training and education | will t | will then bill Select Health. | | | | | | |
| Claims and billing | • Hire | Hire their own counselors and bill Select Health directly. | | | | | | |
| | Cont | Contract with a private provider, who will bill Select Health directly. | | | | | | |



Overview | Four Requirements for seeking Medicaid reimbursement for school mental health services

Service Medicaid covers the service

Recipient

The student-client is enrolled in Medicaid

Provider

The provider is a Medicaid-certified provider

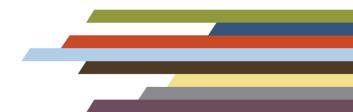
Setting

School is a Medicaidaccepted setting

*For each requirement, key terms vary by state.

Requirement 4 | School is a Medicaid-accepted setting

- As of December 2014, billing Medicaid for services in school settings is now permissible for students without an individualized education program (IEP).
 - Per new guidance from Centers for Medicare and Medicaid Services concerning the "Free Care Rule"
- Regardless of the Free Care Rule guidance, Medicaid will cover school-based behavioral and medical services <u>as specified in a</u> <u>student's IEP</u>.



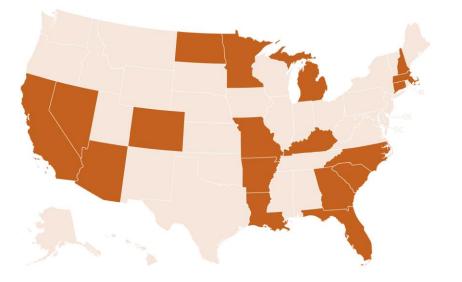
Requirement 4 | School is a Medicaid-accepted setting

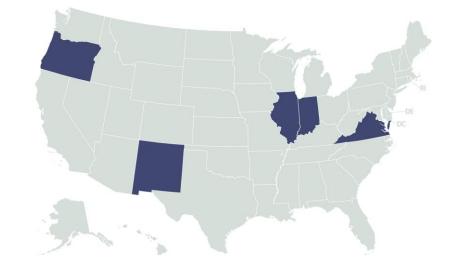
Varies by state: Many (but not all) states are now leveraging the updated federal guidance on the "Free Care Rule"

Where to look: Healthy Schools Campaign resource tracking state actions concerning free care rule implementation for each state

The fine print: Different states may need to take different legislative or regulatory actions to implement the Free Care Rule's updated guidance.

Healthy Schools Campaign Resource

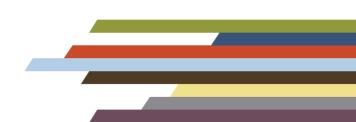




Expanded Medicaid Coverage* in Schools

In Process of Expanding Medicaid Coverage* in Schools

* Not necessarily for mental health services Source: "State Data on Medicaid-Eligible School Health Services & Providers." Healthy Students Promising Futures, a Healthy Schools Campaign Initiative: https://healthystudentspromisingfutures.org/map-school-medicaid-programs/



Requirement 4 | School is a Medicaid-accepted setting

Varies by Medicaid Managed Care plan: Intersecting serviceprovider-setting requirements

- Example: <u>North Carolina</u> (2019) allowed LEAs to bill for various services, including counseling, for all Medicaid-enrolled students.
 - MMC plans may restrict which LEA-employed provider types bill
- Example: <u>South Carolina</u> (2016-2020) carved rehabilitative behavioral health services (RBHS) into Medicaid Managed Care contracts.
 - LEA participation in RBHS dropped from 33 school districts to 12 within 12 months, due to challenges meeting MMC plan requirements

Strategies for Engaging Medicaid Managed Care (MMC) Plans

Identify the MMC plans enrolling beneficiaries in your area

Keep track of policy differences across MMC plans

Maintain a primary point of contact with each plan

Work with state agencies (SEA, Medicaid agency) to broker communications, negotiate pay rates and policies, etc.

• Example: Tennessee (TennCare)



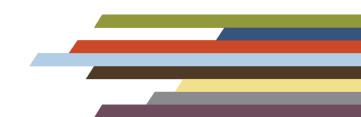


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(POLL) QUESTION #3

Are you aware of any challenges that LEAs or community-based providers have encountered when working with Medicaid Managed Care plans to pay for school mental health services?





SOUTHEAST MHTTC SCHOOL MENTAL HEALTH RESOURCE CATALOGUE



THE SOUTHEAST MENTAL HEALTH TECHNOLOGY TRANSFER CENTER The Southeast Mental Health Technology Transfer Center (MHTTC) is funded by the Substance Abuse and Mental Health Services Administration. The mission of our center is to disseminate evidence-based mental health programs and practices to the eight states in Health and Human Services Region IV (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee) through the provision of trainings and technical assistance as well as the development of resources. Our center is housed in the Department of Health Policy and Management at the Emory University Rollins School of Public Health.

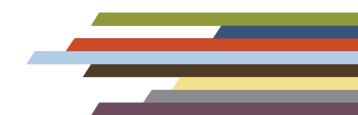
The Southeast MHTTC School Mental Health Initiative is led by Dr. Janet Cummings, a mental health services researcher and national expert on mental health care access and quality among children and adolescents. Our team includes faculty and staff with expertise in public health, mental health systems, health economics, policy, finance, equity, and implementation science. As the regional MHTTC center that specializes in school mental health policy, finance, and workforce, many of the trainings and resources that we have developed address topics related to funding and sustainability of comprehensive school mental health systems.



SAMHSA Substance Abuse and Mental Health Services Administration

School Mental Health Resource Catalogue

You can find the links to all Southeast MHTTC's resources (including the resources we introduce in today's webinar) in this resource catalogue.







SAMHSA

JU-CHEN HU, MHSA, ADAM S. WILK, PHD, JANET R. CUMMINGS, PHD SOUTHEAST MENTAL HEALTH TECHNOLOGY TRANSFER CENTER ROLLINS SCHOOL OF PUBLIC HEALTH, EMORY UNIVERSITY, ATLANTA, GEORGIA

Mental Health Technology Transfer Center Networ

Medicaid and School Mental Health Services: FAQs

In this report, we discuss how schools can finance school mental health services through Medicaid by answering some frequently asked questions.

More resources and details on Medicaid financing for school mental health services can be found in this FAQs report.

Other Relevant Resources

- Webinar: Medicaid and School Mental Health 101: How Can Schools Finance School Mental Health Services through Medicaid?
- Infographic: Financing School-Based Services through Medicaid: Reimbursement for Administrative Expenses



Medicaid and School Mental Health A Guided Tour Through Available Resources

This webinar oriented attendees to nearly 20 resources that help to explain the role of Medicaid in school mental health financing and how to use it to pay for mental health services in schools.





Southeast (HHS Region 4)

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Q & A



