
Behavioral Health Therapy (BHT) Implementation Updates

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Presentation Overview

- CMS Guidance
- DHCS Interim Policy
- BHT Service Delivery at Medi-Cal Managed Care Plans
- Stakeholder Meetings
- State Plan Amendment Updates
- Transition Plan Updates
- Rate Development Updates
- Resources



CMS Guidance

- On July 7, 2014, the Centers for Medicare and Medicaid Services (CMS) released guidance regarding the coverage of BHT services pursuant section 1905(a)(4)(B) of the Social Security Act (the Act) for Early and Periodic Screening, Diagnostic and Treatment services (EPSDT).
- Section 1905(r) of the Act defines the EPSDT benefit to include a comprehensive array of preventive, diagnostic, and treatment services for low-income infants, children and adolescents under age 21.
- States are required to provide coverage to individuals eligible for the EPSDT benefit for any Medicaid covered service listed in section 1905(a) of the Act that is determined to be medically necessary to correct or ameliorate any physical or behavioral conditions.
- The EPSDT benefit is more robust than the Medicaid benefit package required for adults and is designed to ensure that children receive early detection and preventive care and medically necessary treatment services, so that health problems are averted or diagnosed and treated as early as possible.
- All children, including children with ASD, must receive EPSDT screenings designed to identify health and developmental issues, including ASD, as early as possible.



DHCS Interim Policy

- Effective September 15, 2014, the [Medi-Cal Managed Care Plan] **MCP responsibility** for the provision of EPSDT services for beneficiaries 0 to 21 years of age **includes medically necessary BHT services such as ABA and other evidence-based behavioral intervention services** that develop or restore, to the maximum extent practicable, the functioning of a beneficiary with ASD. **MCPs shall ensure** that appropriate EPSDT services are initiated in accordance with **timely access standards** as set forth in the MCP's contracts.

Source: DHCS All Plan Letter 14-011

<http://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2014/APL14-011.pdf>

- Until the transition plan is in place, Regional Centers will continue to provide BHT services for Medi-Cal beneficiaries.



Service Delivery

Beneficiaries Receiving BHT Services
at Medi-Cal Managed Care Plans
(September 5, 2014 – January 10, 2015)

BHT Calls Received	1,623
Currently Receiving BHT Services	418
Referred for CDE	627
Completed CDE	324
Referred for Assessment	643
Completed Assessment	241

CDE = Comprehensive Diagnostic Evaluation



Stakeholder Engagement

- DHCS holds monthly meetings with stakeholders to develop and define, subject to the limitations allowed under federal law:
 - Eligibility criteria
 - Provider participation criteria
 - Utilization controls
 - The delivery systems for BHT services
- To operationalize this, DHCS holds biweekly plan calls to discuss implementation needs and respond to situations raised by the Medi-Cal managed care plans.



Stakeholder Meeting Schedule

Thursday, January 22, 2015
3:00 p.m. – 5:00 p.m.
Department of Health Care Services
1500 Capitol Avenue, Auditorium

Thursday, February 19, 2015
3:00 to 5:00 p.m.
Department of Health Care Services
1500 Capitol Avenue, Auditorium

Thursday, March 19, 2015
3:00 p.m. – 5:00 p.m.
Department of Health Care Services
1500 Capitol Avenue, Auditorium

Thursday, April 23, 2015
9:30 a.m. – 11:30 a.m.
Department of Health Care Services
1500 Capitol Avenue, Auditorium

Friday, May 22, 2015
9:30 a.m. – 11:30 a.m.
Department of Health Care Services
1500 Capitol Avenue, Auditorium

Thursday, June 18, 2015
3:00 p.m. – 5:00 p.m.
Department of Health Care Services
1500 Capitol Avenue, Auditorium



State Plan Amendment Updates

- BHT State Plan Amendment (SPA) was formally submitted to the federal Centers for Medicare and Medicaid Services (CMS) on September 30, 2014.
- Revised SPA language incorporating stakeholder comments were informally submitted to CMS, to the extent they were consistent with DHCS and CMS interpretation of federal regulations and state statutes, and CMS guidance.



Transition Plan

- DHCS and DDS meet weekly to discuss state and federal requirements, milestones, operational steps, deliverables, timelines, and assess progress.
- As of December 2014, DDS reported a total of approximately **7,500** Medi-Cal managed care BHT beneficiaries, with over **7,000** in managed care.



Transition Plan

Major activities in progress for the development of the transition plan:

- ✓ Discussions with CMS regarding state plan and 1915 waiver amendments
- ✓ Gathering and reviewing DDS/Medi-Cal client data
- ✓ Discuss lessons learned and gather consumer comments
- ✓ Drafting notices to Medi-Cal beneficiaries, Regional Centers, Plans
- ✓ Develop milestones, operational steps, deliverables, timelines and Transition Plan
- ✓ Develop Implementation Plan, including phased approach, as necessary



BHT Rate Development

Major activities in progress for rate development:

- ✓ Discussions with Mercer regarding state plan and 1915 waiver requirements
- ✓ DDS is gathering and DDS/Medi-Cal client data and claims for review by Mercer
- ✓ Mercer is reviewing commercial BHT data and data from other states
- ✓ DHCS anticipates Mercer will have capitated rates/payment methodologies available for managed care plans by March 2015
- ✓ Existing payment methodologies will be used to reimburse providers contracted with Regional Centers



Resources

- State Plan Amendment submitted to CMS on September 30, 2014
http://www.dhcs.ca.gov/formsandpubs/laws/Documents/14-026_REDACTED_PACKAGE.pdf
- All Plan Letter 14-011, Interim Policy for the Provision of Behavioral Health Treatment Coverage for Children Diagnosed with Autism Spectrum Disorder
<http://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2014/APL14-011.pdf>
- All Plan Letter 13-023, Continuity of Care for Medi-Cal Beneficiaries Who Transition from Fee-for-Service Medi-Cal into Medi-Cal Managed Care
<http://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2013/APL13-023.pdf>
- Behavioral Health Treatment Information and Resources webpage
<http://www.dhcs.ca.gov/services/medi-cal/Pages/BehavioralHealthTreatment.aspx>



