

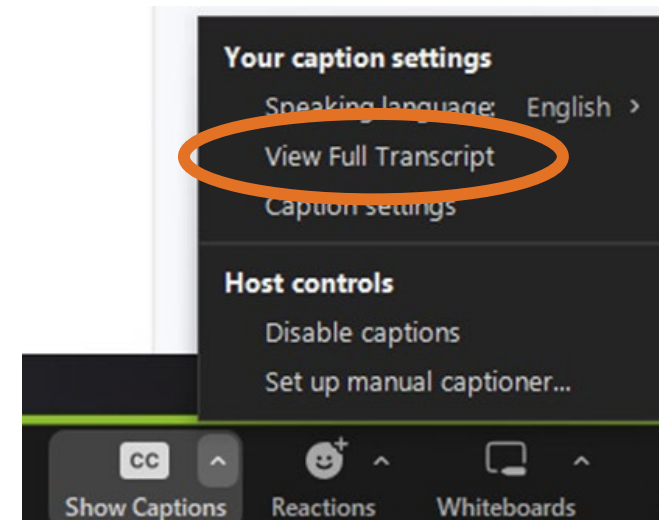
Supporting Student Mental Health Through the LEA BOP

Facilitated by: WestEd
September 28, 2023
11:00 a.m.—12:00 p.m.

WE WILL BEGIN THE WEBINAR SHORTLY

Live Transcription Available

- » Find the **CC**(Show Captions) icon in your Zoom toolbar.
- » Click "View Full Transcript," and you will be able to view the transcript in the side panel of the meeting.
- » Note: You can click on the provided and drag them to move the position in the meeting window.



Introductions



- » Sarah Borkowski
- » Monica Velasco
- » Stephanie Magee
- » Regina Zerne



- » Jeremy Ford
- » Lisa Eisenberg
- » Colleen Meacham
- » Hannah Jarmolowski

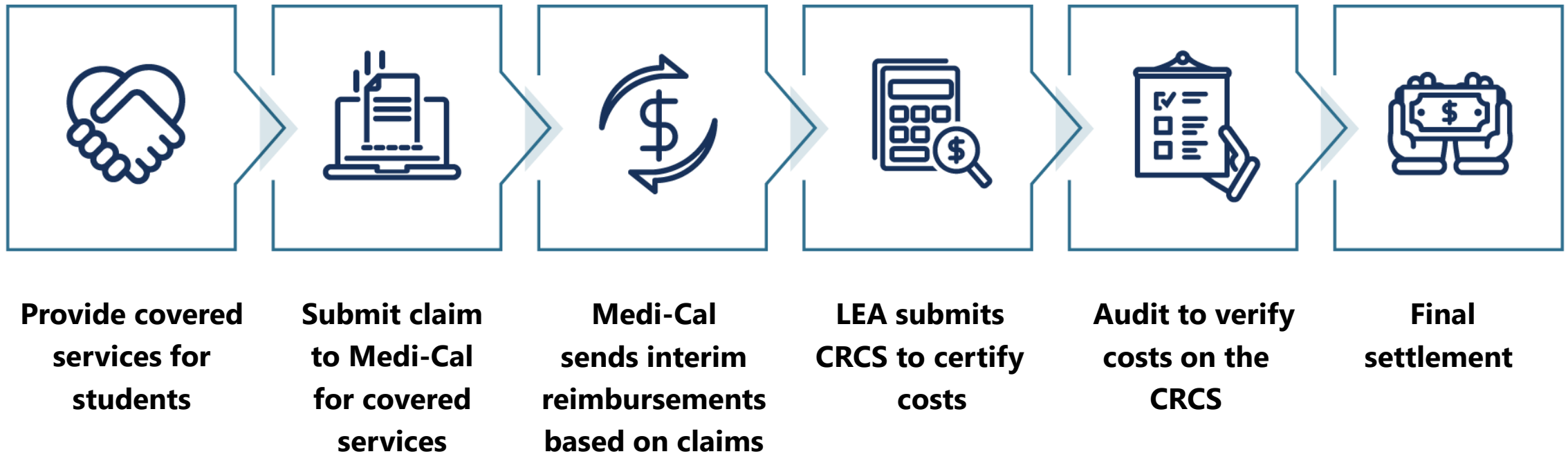
Workshop Goals

- » Supporting student mental health services using LEA BOP.
- » Understand the specific requirements for mental health practitioners delivering services to students.
- » Understand the differences between LEA BOP-covered services for special and general education students.

Agenda

- » Program Benefits & Enhancements
- » Covered Mental Health Services
- » Requirements and Best Practices
- » Q&A
- » Next Steps & Closing

LEA BOP 101 Refresher



Program Benefits and Covered Mental Health Services

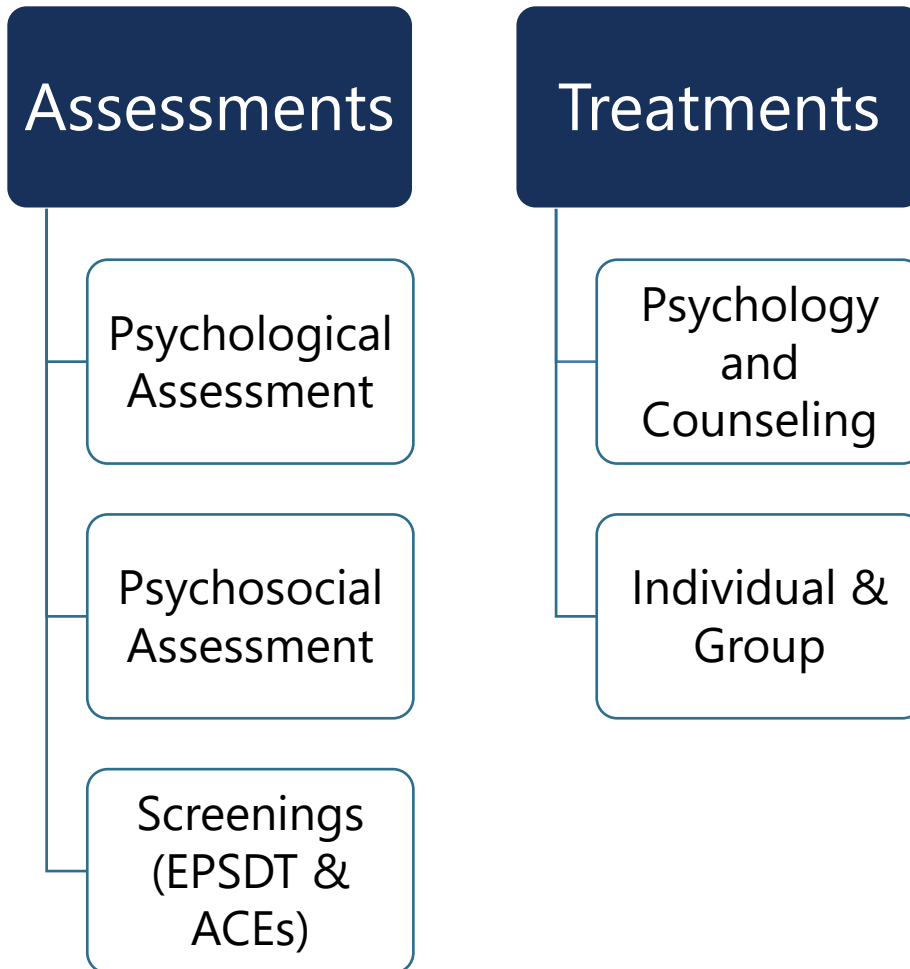
Program Benefits

- » Sustaining one-time investments in student mental health
- » The program accounts for your costs

Program Enhancements

- » New practitioner types
- » Eligible students

Covered Services



What is ORP?

- » ORP = Ordering, Referring and Prescribing
- » A qualified ORP practitioner is required to bill for psychological and counseling treatment services

Qualifications to be an ORP Practitioner

Sign up as a qualified ORP practitioner:

- » Register for an individual National Provider Identification (NPI) number
- » Enroll in Medi-Cal as an ORP provider in the Provider Application and Validation for Enrollment (or PAVE) system

Eligible Practitioners

- » Licensed psychologists**
 - » Licensed educational psychologists**
 - » Credentialed school psychologists
 - » Licensed clinical social workers**
 - » Credentialed school social workers
 - » Registered associate clinical social workers
 - » Licensed marriage and family therapists**
 - » Associate marriage and family therapists
 - » Credentialed school counselors
 - » Licensed physicians**
 - » Licensed physician assistants
 - » Registered credentialed school nurses**
- ** Qualified to be ORP practitioners

NEW: Credentialed School Counselors

- » AB 2508 → Amended Ed Code Section 49600
- » LEA BOP will reimburse for psychology and counseling treatment services

Crosswalk of Services to Common Practitioners

	EPSDT and ACEs Screenings	Psychological and Counseling Treatments	Psychosocial Assessments	Psychological Assessments
Licensed psychologists	Yes	Yes	Yes	Yes
Licensed educational psychologists	Yes	Yes	Yes	Yes
Credentialed school psychologists	Yes	Yes	Yes	Yes
Licensed clinical social workers	Yes	Yes	Yes	
Registered associate clinical social workers	Yes	Yes	Yes	
Licensed marriage and family therapists	Yes	Yes	Yes	
Associate marriage and family therapists	Yes	Yes	Yes	
Credentialed school social workers	Yes	Yes	Yes	
Credentialed school counselors	Yes	Yes	Yes	
Licensed physicians	Yes	Yes		
Licensed physician assistants	Yes	Yes		
Registered credentialed school nurses	Yes			

Using the Provider Manual



The screenshot shows the DHCS website header with navigation links: Home, About DHCS, and Translate. Below the header is a menu with icons and labels: Services, Individuals, Providers & Partners, Laws & Regulations, Data & Statistics, Forms & Publications, and Search. The main content area features the title "Local Educational Agency Medi-Cal Billing Option Program Provider Manual" and a link "Back to LEA Home Page". Under the heading "Medi-Cal Provider Manual:", there are two links: "Part 1 - Medi-Cal Program and Eligibility" and "Part 2 - Local Educational Agency". Below this, a text block states "The following items link to various sections of the LEA BOP Provider Manual:" followed by two links: "LEA (loc ed)" and "LEA: A Provider's Guide (loc ed a prov)".

Local Educational Agency Medi-Cal Billing Option Program Provider Manual

[Back to LEA Home Page](#)

Medi-Cal Provider Manual:

- [Part 1 - Medi-Cal Program and Eligibility](#)
- [Part 2 - Local Educational Agency](#)

The following items link to various sections of the LEA BOP Provider Manual:

- [LEA \(loc ed\)](#)
- [LEA: A Provider's Guide \(loc ed a prov\)](#)

Scroll Down

- [LEA Service: Physical Therapy \(loc ed serv phy\)](#)
- [LEA Service: Physician Billable Procedures \(loc ed serv physician\)](#)
- [LEA Service: Psychology/Counseling \(loc ed serv psych\)](#)
- [LEA Service: Respiratory Care \(loc ed serv respir\)](#)
- [LEA Service: Speech Therapy \(loc ed serv spe\)](#)

Provider Manual: Psychology/ Counseling


loc ed serv psych
9

Page updated: April 2023




IEP/IFSP Assessments

Procedure Codes/Service Limitations for IEP/IFSP Psychological Assessments Table



Procedure Code/Modifier	LEA Program Usage	LEA Limitations (Per Student)
96130 TL (IFSP)	Initial IFSP psychological assessment	One per lifetime per provider
96130 TM (IEP)	Initial or triennial IEP psychological assessment	One every third state fiscal year per provider
96130 52 TL (IFSP) or 96130 52 TM (IEP)	Annual IEP/IFSP psychological assessment	One every state fiscal year per provider when an initial or triennial IEP/IFSP psychological assessment is not billed



Other Helpful Website Resources

Provider Manual

- » Psychology/Counseling Section: https://mcweb.apps.prd.cammis.medi-cal.ca.gov/assets/8F88C8BC-FEB6-43CC-8ED2-A641ACA3705D/locedservpsych.pdf?access_token=6UyVkRRfByXTZEWIh8j8QaYyIPyP5ULO
- » Billing and Reimbursement Overview: https://mcweb.apps.prd.cammis.medi-cal.ca.gov/assets/87F0BA57-6066-4162-B816-73249C39B971/locedbil.pdf?access_token=6UyVkRRfByXTZEWIh8j8QaYyIPyP5ULO

Helpful Policy & Procedure Letters (PPLs)

- » PPL 22-008R – Expansion of Services Provided by ASWs and AMFTs: <https://www.dhcs.ca.gov/formsandpubs/Documents/PPL-22-008R-Pre-licensed-AMFT-and-ACSW-Assessments-Revised.pdf>
- » PPL 20-051 – Coordination of Mental Health Services: <https://www.dhcs.ca.gov/formsandpubs/Documents/ACLSS%20PPLs/2020/PPL20-051LEABOPMentalHealth.pdf>

Requirements and Best Practices

Documentation Requirements

- » Recommendation by one of the following:
 - » Physician
 - » Registered credentialed school nurse
 - » Licensed clinical social worker, psychologist, educational psychologist, marriage and family therapist
- » EPSDT Screening → Periodicity Schedule
- » For treatments → Care plan

Supervision Requirements

- » Associate Marriage and Family Therapists or Associate Clinical Social Workers must be clinically supervised by one of the following:
 - » Licensed clinical social worker
 - » Licensed marriage and family therapist
 - » Licensed professional clinical counselor
 - » Licensed clinical psychologist
 - » Licensed physician certified in psychiatry
- » Anyone without a Pupil Personnel Services (PPS) Credential must be supervised in their school-based activities by an individual holding a PPS credential

Best Practices

- » Use non-federal dollars
- » Only include eligible costs
- » Avoid double-dipping
- » Add eligible practitioners to the Time Survey Participant (TSP) list

Poll

- ☐ **What practitioner can order, refer, and/or prescribe mental health treatment services?**
- ☐ **Under LEA BOP policy, which staff requires clinical supervision to provide psychological and counseling services?**
- ☐ **Which of the following scenarios is most likely allowable for reimbursement under LEA BOP?**

Supporting Student Mental Health

Questions and Answers

Supporting Mental Health – Question 1

» **Question:** What are examples of covered health education/anticipatory guidance?

» **Answer:** Some examples of health education/anticipatory guidance, are:

- Promoting an alcohol, tobacco, and drug-free lifestyle/preventing alcohol and drug use.
- Promoting healthy eating and nutrition.
- Promoting mental and emotional health (discussing symptoms of anxiety/depression, for instance).
- Promoting physical activity and personal health/wellness.
- Promoting safety and injury prevention.
- Preventing violence and intentional injury.
- Providing information on pregnancy or STD/STI prevention.
- Providing information about the benefits of healthy lifestyles and practices.
- Providing age-specific information on health and safety-related topics.

Supporting Mental Health – Question 2

» **Question:** Are risk assessments billable?

» **Answer:**

- The Periodicity Schedule covers some assessments like Tobacco, Alcohol, or Drug Use Assessments, and Depression and Suicide Risking Screenings. Risk assessments are billable when an LEA's practitioners are trained in appropriately providing those assessments and screenings.
- Refer to the American Academy of Pediatrics Bright Futures Periodicity Schedule for information on risk assessments. You can find more information in the following link:
<https://www.aap.org/periodicityschedule>.

Supporting Mental Health – Question 3

» **Question:** Some services from Pupil Personnel Services (PPS) Credentialed School Counselors, like risk assessments, are not covered. What other services would not be covered under this practitioner type?

» **Answer:**

- IEP/IFSP psychosocial status assessments
- Psychosocial status assessments (non-IEP/IFSP)
- Health education/anticipatory guidance (non-IEP/IFSP)
- ACEs screenings
- Psychology and counseling treatments, for individuals and groups
- More details can be found in the LEA BOP Provider Manual loc ed serv psych section:
https://mcweb.apps.prd.cammis.medi-cal.ca.gov/assets/8F88C8BC-FEB6-43CC-8ED2-A641ACA3705D/locedservpsych.pdf?access_token=6UyVkRRfByXTZEWlh8j8QaYyIPyP5ULO

Supporting Mental Health – Question 4

- » **Question:** Which mental health practitioners are covered under HIPAA and FERPA requirements, and what is needed to secure parental consent for Medi-Cal billing?
- » **Answer:** For more detailed information regarding these requirements, please see the following guides:
 - The California School-Based Health Alliance's HIPAA/FERPA guide: <https://www.schoolhealthcenters.org/resources/sbhc-operations/student-records-consent-and-confidentiality/california-guide/>
 - And Federal Joint Guidance on the Application of FERPA and HIPAA to Student Health Records: <https://www.hhs.gov/hipaa/for-professionals/special-topics/ferpa-hipaa/index.html>

Supporting Mental Health – Question 5

» **Question:** Are Board Certified Behavior Analysts (BCBAs) and Licensed Professional Clinical Counselors (LPCCs) eligible practitioners? Are there plans to include them in the following State Plan Amendment?

» **Answer:**

- No, LPCCs and BCBAs are not eligible practitioners. DHCS will take the recommendation under advisement to include these roles in future program expansions.
- To find more information for specifics for eligibility, supervising, modifying, and more for their practitioners, see the LEA BOP Provider Manual, LEA Service section for Psychology/Counseling (located serv psych):
<https://mcweb.apps.prd.cammis.medi-cal.ca.gov/file/manual?fn=locatedservpsych.pdf>

Supporting Mental Health – Question 6

- » **Question:** Are LEAs able to bill for Educationally Related Mental Health Services (ERMHS) and ERMHS clinicians?
- » **Answer:** Yes, so long as billed services follow all the other program requirements, such as documentation of the services and medical necessity. Please refer to a recent DHCS e-blast update for more details on the requirements:
<https://www.dhcs.ca.gov/provgovpart/Documents/DHCS-ERMHS-ERICS-Update.pdf>

Supporting Mental Health – Question 7

» **Question:** Will any changes allow billing for ERMHS Individualized Education Plan (IEP) services?

» **Answer:**

- DHCS provided new guidance regarding ERMHS via e-blast (see previous slide for the link). DHCS received approval from the CMS that, effective SFY 2023-24, medically necessary services that result from an ERMHS/ERICS assessment are reimbursable when they are part of an IEP, IFSP, or IHSP.
- Practitioners who were removed from the Random Moment Time Survey (RMTS) last state fiscal year (SFY), 2022-23, because their job title included ERMHS, ERICS, or some reference to “educationally related” may be returned as Time Survey Participants (TSPs) in the RMTS Participant Pool 1 for SFY 2023-24 Quarter 2.

Supporting Mental Health – Question 8

- » **Question:** Do general education students need a diagnosis to bill for covered treatment services?
- » **Answer:** To submit a Medi-Cal claim, include an ICD-10 diagnosis code. In cases where services are provided due to a suspected mental health disorder that has not yet been diagnosed, options are available in the ICD-10 diagnosis code list, such as “Z codes” for “unspecified disorders.”

Supporting Mental Health – Question 9

- » **Question:** What are methods for electronic health records (EHRs) and/or processes to submit claims and document services?
- » **Answer:** Although neither is required to participate in the program, many LEAs use some electronic system to document services, and some LEAs work with a vendor. LEAs often contact neighboring LEAs participating in the LEA BOP to discuss claiming and submitting platforms and services.

Supporting Mental Health – Question 10

» **Question:** Does the Care Plan need an IEP, 504, or IHSP. What is the standard for a plan to qualify as an approved Care Plan? Is it considered part of the educational record?

» **Answer:**

- The Care Plan must be an IEP/IFSP, or IHSP.
- For an IHSP, other common names can be Individualized School Healthcare Plan; plan of care; treatment plan; and nursing plan. The IHSP can stand on its own or can be incorporated into an IEP, IFSP or a Section 504 Plan.
- IEPs are CDE requirements, so they are considered part of the student's education record.
- Please find information on the qualifications for a Care Plan from our Provider Manual below:
 - https://mcweb.apps.prd.cammis.medi-cal.ca.gov/assets/C3953217-6DD0-46DD-ADA0-8829729C56C2/locedindiv.pdf?access_token=6UyVkRRfByXTZEWIh8j8QaYyIPyP5ULO

Supporting Mental Health – Question 11

» **Question:** Can district mental health staff sign up under Children and Youth Behavioral Health Initiative (CYBHI) and bill under LEA BOP and CYBHI?

» **Answer:**

- For CYBHI, Cohort 1 will open for all interested LEAs in January 2025.
- Many questions about how billing the CYBHI fee schedule and the LEA BOP will work are addressed. Guidance is under development and will be shared once it becomes available.
 - Please e-mail any questions relating to the Fee Schedule to CYBHI@dhcs.ca.gov.

Supporting Mental Health – Question 12

- » **Question:** If an LPCC or Associate Professional Clinical Counselor (APCC) has a PPS credential in school counseling, does this allow them to bill for services if they are not hired as a school counselor but working in the capacity of mental health?
- » **Answer:** No, the provider manual lists the allowable practitioners eligible for reimbursements under the LEA BOP. If the practitioner is not listed, then it is not a permissible practitioner.

Supporting Mental Health – Question 13

» **Question:** Can Nurse Practitioners bill for services if they are not hired as such but working in the capacity of mental health?

» **Answer:**

- Nurse practitioners are qualified practitioners through the LEA BOP. The Provider Manual lists the procedure codes and service limitations for what is allowable:
https://mcweb.apps.prd.cammis.medi-cal.ca.gov/assets/6314ECCC-67D6-42BD-8A04-E872A594C7E3/locedservnurs.pdf?access_token=6UyVkRRfByXTZEWIh8j8QaYyIPyP5ULO
- The practitioner must be identified on the Participant Pool 1 TSP list.
 - If included on the Participant Pool 2 TSP list for administrative activities, then the nurse practitioner is not eligible to receive LEA BOP funds.

Supporting Mental Health – Question 14

» **Question:** In place of a Mental Health ORP, can a parent or teacher submit a referral?

» **Answer:**

- **Only** for assessments.
- Parents, teachers, and registered credentialed school nurses can submit a referral for assessment.
- Treatment requires a licensed practitioner's recommendation.
- You can find more information below:
 - https://mcweb.apps.prd.cammis.medi-cal.ca.gov/assets/173943C5-EB52-46D4-B74C-F784E6F3EBEC/locedaprov.pdf?access_token=6UyVkRRfByXTZEWIh8j8QaYyIPyP5ULO
 - https://www.dhcs.ca.gov/provgovpart/Documents/ACLSS/LEA%20BOP/Program_Req_and_Info/ORP-Req-Guide.pdf

Supporting Mental Health – Question 15

- » **Question:** Why haven't/when will Licensed Professional Clinical Counselors (LPCCs) be approved as mental health practitioners and as Ordering, Referring and Prescribing (ORP) providers?
- » **Answer:** With the SPA in 2015, these practitioners were not made part of the amendment. After approval, DHCS began receiving requests for this practitioner type, to which DHCS is considering including these practitioners in the next SPA update. Federal confirmation of another SPA update can be a lengthy timeline, leaving no immediate inclusion plans pending.

Next Steps and Closing

Resources for Support

- » Tools on the website
- » Quarterly Stakeholder Meetings
- » TA Visit request form

Upcoming Workshops & Trainings

- » LEA BOP and the Time Survey Participant (TSP) List, October 19 at 1 p.m. – Register Now!
- » Coordinating with and Billing for Contractors, November 6
- » LEA BOP 101 for Small or Rural LEAs, December 11
- » Consortia: How to Start and Participate in Them, January 16
- » New LEA BOP Coordinator Onboarding, February 15

Thank you!

- » Remember to complete your workshop survey using the QR code located below

