



# Behavioral Health & Developmental Disabilities Administration

Practice Improvement Steering Committee

9/3/2020

COVID-19 Medicaid Waiver Updates

Figure 1. BHDDA FY20 PIHP/CMHSP Behavioral Health Medicaid Program Managed Care Service Provision and Authorities

Authority	Behavioral Health 1115 Waiver	Behavioral Health Covered EPSDT	Behavioral Health Covered State Plan	Children's Waiver 1915(c)	SED Waiver 1915(c)	Habilitation Supports Waiver 1915(c)	1915 (i) SPA
Services	<ul style="list-style-type: none"> <li>PIHP Managed Care Authority</li> <li>SUD Services</li> </ul>	<ul style="list-style-type: none"> <li>ABA</li> <li>Community Living Supports</li> <li>Home-Based</li> <li>Family Support &amp; training</li> <li>Peer Delivered or operated services</li> <li>Prevention Direct Service Models</li> <li>Skill Building</li> <li>Supported/integrated Employment</li> <li>Supports Coordination</li> <li>Wraparound</li> </ul>	<ul style="list-style-type: none"> <li>Assertive Community Training</li> <li>Assessments</li> <li>Behavior Treatment Review</li> <li>Child Therapy</li> <li>Clubhouse</li> <li>Psychosocial Rehabilitation</li> <li>Crisis Intervention &amp; Residential</li> <li>Family Therapy</li> <li>Health Services</li> <li>Individual &amp; Group Therapy</li> <li>Inpatient Psych Hospitalization</li> <li>Intensive Crisis Stabilization</li> <li>Medication Admin/Review</li> <li>Nursing Facility MH Monitoring</li> <li>OT, PT, Speech</li> <li>Peer-delivered or -operated services</li> <li>Personal Care in Specialized Homes</li> <li>Supports Coordination</li> <li>Targeted Case Management</li> <li>Telemedicine</li> <li>Transportation</li> <li>Treatment Planning</li> </ul>	<ul style="list-style-type: none"> <li>Community Living Supports</li> <li>Enhanced Transportation</li> <li>Environmental Accessibility Adaptations (EAA)</li> <li>Family Support &amp; Training</li> <li>Fiscal Intermediary</li> <li>Non-family training</li> <li>Respite</li> <li>Specialized Medical Equipment &amp; Supplies</li> <li>Specialty Services</li> </ul> <p><b>NEW</b></p> <ul style="list-style-type: none"> <li>Overnight Health and Safety Support</li> </ul>	<ul style="list-style-type: none"> <li>Community Living Supports</li> <li>Child Therapeutic Foster Care</li> <li>Family Support &amp; Training</li> <li>Non-family training</li> <li>Therapeutic Activities</li> <li>Therapeutic Overnight Camp</li> <li>Community Transition Services</li> <li>Respite</li> <li>Wraparound</li> </ul> <p><b>NEW</b></p> <ul style="list-style-type: none"> <li>Fiscal Intermediary</li> <li>Overnight Health and Safety Support</li> </ul>	<ul style="list-style-type: none"> <li>Community Living Supports</li> <li>Enhanced Medical Equipment &amp; Supplies</li> <li>Enhanced Pharmacy</li> <li>Environmental Modifications</li> <li>Family Support &amp; Training</li> <li>Goods and Services</li> <li>Out-of-home non-vocational habilitation</li> <li>Personal Emergency Response System (PERS)</li> <li>Prevocational Services</li> <li>Private Duty Nursing</li> <li>Respite</li> <li>Supported/Integrated Employment</li> </ul> <p><b>NEW</b></p> <ul style="list-style-type: none"> <li>Fiscal intermediary</li> <li>Non-family Training</li> <li>Overnight Health and Safety Support</li> </ul>	<ol style="list-style-type: none"> <li>Community Living Supports</li> <li>Enhanced Pharmacy</li> <li>Environmental Modifications</li> <li>Family Support &amp; Training</li> <li>Fiscal Intermediary</li> <li>Housing Assistance</li> <li>Specialized Medical Equipment &amp; Supplies (Assistive Tech)</li> <li>Respite</li> <li>Skill Building</li> <li>Supported/Integrated Employment</li> <li>Vehicle Modification (Assistive Tech)</li> </ol>

\*ICF/IID = Intermediate Care Facility for Individuals with Intellectual Disabilities

Administered by FCS highlighted in orange above

# COVID-19 Medicaid Program Authority Options

## COVID-19 State 1135 Waiver

- Waives various Administrative requirements to increase access during a time of national emergency.

## COVID-19 State 1115 Waiver Demonstration

- Can make available several flexibilities to focus states operations on addressing the COVID-19 pandemic and assist in enrolling and serving beneficiaries in Medicaid.

## COVID-19 Behavioral Health Appendix K Waiver

- Appendix K to help states accelerate changes to their 1915(c) home and community-based services waiver operations or to request emergency amendments.

# BHDDA 1135 Requested Waiver Status Update

CMS approved and effective 3/1/2020 the following Behavioral Health related requests through the termination of the public health emergency;

- ▶ Extend pre-existing authorizations for which a beneficiary has previously received prior authorization through the end of the public health emergency
  - ▶ Permit services approved to be provided to continue to be provided without a requirement for a new or renewed prior authorization
- ▶ Temporarily/provisionally enroll and reimburse new or out-of-state providers that meet CMS required criteria
- ▶ Provision and reimburse services rendered in alternative settings (licensed facilities)
- ▶ Telehealth and Telephonic Expansion
- ▶ Flexibility in the Person-Centered Planning Process and Plan

# BHDDA 1115 Demonstration Waiver Status Update

Under this demonstration opportunity, as a result of the COVID-19 public health emergency, BHDDA is pursuing CMS approval for:

- ▶ Flexibility in the Person-Centered Planning Process and Plan
- ▶ Expand Telehealth options
- ▶ Annual reassessments of level of care that exceed the 12-month authorization period and will remain open to services
- ▶ Modify processes for level of care evaluations or re-evaluations, and eligibility criteria for services and supports
- ▶ Flexibility in payment for services and supports to providers for impacted individuals delivered in alternative settings
- ▶ Payments to certain habilitation and personal care providers to maintain capacity during the emergency
- ▶ Modify the quality and other data reported on certain performance measures, other than those identified for the Health and Welfare assurance for this time frame when the data is unavailable to be obtained due to the circumstances of the pandemic.

# BHDDA Appendix K Amendment Status Update

CMS has approved BHDDA's temporary amendment through the Appendix K for all approved 1915(c) waivers (HSW, CWP, and SEDW). This amendment is effective **3/1/2020** through **2/28/2021**.

Key temporary changes include;

- ▶ Modify waiver service scope and allow certain service limitations to be exceeded
- ▶ Expand setting(s) where services may be provided
- ▶ Modify provider qualifications
- ▶ Modify processes for level of care evaluations or re-evaluations
- ▶ Modify person-centered service plan development process
- ▶ Temporarily increase payment rates
- ▶ \*Temporarily allow for payment for services for the purpose of supporting waiver participants in an acute care hospital or short-term institutional setting

**\*NOTE:** supports are not available in that setting or individually required for communication and behavioral stabilization, and such services are not covered in such settings.

# BHDDA Updates & Resources

- Check our Website for BHDDA Communications Related to COVID-19, Policy Updates, and Changes

The screenshot displays the MDHHS website interface. At the top, there is a navigation bar with links for 'FAQs', 'Contact Us', 'MDHHS Home', and 'MI.gov'. Below this is a banner featuring the MDHHS logo and a group of diverse people. A search bar is positioned on the right side of the banner. Underneath the banner, a row of menu items includes 'Assistance Programs', 'Adult & Children's Services', 'Safety & Injury Prevention', 'Keeping Michigan Healthy', 'Doing Business with MDHHS', and 'Inside MDHHS'. The 'Keeping Michigan Healthy' section is expanded, showing a list of sub-links on the left: 'Keeping Michigan Healthy', 'Announcements', 'Child Welfare Medical Resources', 'Behavioral Health & Developmental Disability', 'Future of Behavioral Health', 'Behavioral Health Information Sharing & Privacy', 'Marihuana', 'Syringe Service Program (SSP)', 'Veteran Navigators', and 'BH Recovery & Substance Use'. The main content area for 'Keeping Michigan Healthy' displays the title 'Welcome to Behavioral Health and Developmental Disabilities Administration' followed by an 'URGENT:' notice. The notice text reads: 'Learn about our responses to Coronavirus and find the latest program guidance. [www.Michigan.gov/Coronavirus](http://www.Michigan.gov/Coronavirus) >> Resources >> For Health Professionals'. Below this, it states 'MDHHS ADVISES REVIEW OF "Actions for Caregivers of Older Adults During COVID-19"'. Further down, it says 'Learn who is essential by reviewing the "Stay Home, Stay Safe" directive here (Updated Executive Order 2020-77 (COVID-19))'. A link titled 'BHDDA Communications Related to COVID-19 Policy Updates and Changes' is highlighted with an orange box and pointed to by a large orange arrow. At the bottom, a welcome message states: 'Welcome to the Behavioral Health and Developmental Disabilities Administration Web Site. The Behavioral Health and Developmental Disabilities Administration (BHDDA) is located within the Michigan Department of Health and Human Services (MDHHS).'

MDHHS / KEEPING MICHIGAN HEALTHY  
/ BEHAVIORAL HEALTH & DEVELOPMENTAL DISABILITY

## Welcome to Behavioral Health and Developmental Disabilities Administration

**URGENT:**

Learn about our responses to Coronavirus and find the latest program guidance. [www.Michigan.gov/Coronavirus](http://www.Michigan.gov/Coronavirus) >> Resources >> For Health Professionals

MDHHS ADVISES REVIEW OF "Actions for Caregivers of Older Adults During COVID-19"

Learn who is essential by reviewing the "Stay Home, Stay Safe" directive here (Updated Executive Order 2020-77 (COVID-19))

[BHDDA Communications Related to COVID-19 Policy Updates and Changes](#)

Welcome to the Behavioral Health and Developmental Disabilities Administration Web Site. The Behavioral Health and Developmental Disabilities Administration (BHDDA) is located within the Michigan Department of Health and Human Services (MDHHS).

# BHDDA Updates & Resources

## COVID-19 Response: Medicaid Waivers and State Plan Amendments

MI Appendix K Approval Letter - signed - 06-19-2020

MI (0167, 4119, 0438) Appendix K - 06-19-2020

[MI 20-0005 Approval Package](#) - 06-05-2020

## Services

COVID-19 Emergency Dental Directory - 04-13-20

Plan of Service and Due Process Concerns Memo - 04-08-20 - - **RESCINDED**

## Training

CPR Training Extension Updated Advisory Memo - 04-07-2020



# Behavioral Health Fee Schedule

IRM = Independent Rate Model  
SCA = Standards Cost Allocation

Workgroup Members –

- ▶ In conjunction with the behavioral health fee schedule project, the service codes and current modifiers used by the behavioral health delivery system are being reviewed for opportunities to support granularity where differentiation is helpful in supporting more consistency in the unit cost of services.
- ▶ Additionally, opportunities have been identified for alignment with national definitions and verification of qualified providers, which will help inform the wage variation in the independent rate model development.