

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Health Care Finance



Office of the Senior Deputy Director/Medicaid Director

Transmittal # 19-26

TO: District of Columbia Managed Care Organizations and Fee-for-Service Providers

FROM: Melisa Byrd 
Senior Deputy Director/Medicaid Director

DATE: December 18, 2019

SUBJECT: Billing Guidance for Medicaid Section 1115 Behavioral Health Transformation Demonstration Services

The purpose of this transmittal is to outline which entity—either a beneficiary’s Managed Care Organization (MCO) or the Department of Health Care Finance (DHCF)—enrolled Medicaid providers shall bill for services under the District’s Medicaid Section 1115 Behavioral Health Transformation Demonstration waiver, effective January 1, 2020. This document and Tables 1 and 2 below provide more information.

Psychiatric Hospitalization, Withdrawal Management and Residential SUD Services:

MCO “In Lieu of” Coverage for IMD Services

Under 42 CFR 438.6 (e) and as noted in the MCO Contract, DHCF may continue to make capitation payments on behalf of an individual, ages 21-64, that has a short-term stay in an Institute for Mental Disease (IMD). As a result, the MCOs are responsible for payment for any stay by an MCO member that does not exceed fifteen (15) days in a calendar month. This payment arrangement will maintain for Psychiatric Hospitalizations and Withdrawal Management and Residential Substance Use Disorder (SUD) services after January 1, 2020.

Prior Authorizations and Billing for IMD Waiver Services

For Psychiatric Hospitalization, Withdrawal Management and Residential SUD services only, if an individual, ages 21-64, enrolled in an MCO requires more than 15 cumulative “in lieu of” days per month (or, if a continuous length of stay crosses two calendar months, for up to thirty (30) cumulative days total), the provider and the MCO shall each send a request to the District of Columbia’s Quality Improvement Organization (QIO) to authorize additional days. Based on medical necessity, the QIO may thereafter authorize up to sixty (60) days for Psychiatric Hospitalization or no limit for Withdrawal Management and Residential SUD Services.

DHCF advises both MCOs and providers to monitor the length of stay for Psychiatric Hospitalization, Withdrawal Management, and Residential SUD Services in order to determine the appropriate entity to bill. If the wrong entity is billed and the associated claims are paid, those payments may be subject to recoupment.

Table 1. Psychiatric Hospitalization, Withdrawal Management and Residential SUD Services

Service	Beneficiary's Medicaid Enrollment	If the Length of Stay is...	Provider Should Bill...
Psychiatric Hospitalization	MCO	Within the "in lieu of" limit	MCO
		More than the "in lieu of" limit	DHCF
	FFS	Up to 60 consecutive days	DHCF
Withdrawal Management and Residential SUD Services (excludes Room and Board)	MCO	Within the "in lieu of" limit	MCO
		More than the "in lieu of" limit	DHCF
	FFS	No limit	DHCF

Other Waiver Services:*Prior Authorizations and Billing for Other Waiver Services*

For Licensed Behavioral Health Practitioners, Clubhouse Services, Recovery Support Services (RSS), and MAT services, no prior authorization is required. For Medicaid beneficiaries enrolled in an MCO, Licensed Behavioral Health Practitioners should bill the MCO for those services. For all other waiver services in Table 2, the provider should bill DHCF under FFS Medicaid.

Table 2. Other Waiver Services

Service	Beneficiary's Medicaid Enrollment	Provider Should Bill...
Licensed Behavioral Health Practitioners (Psychologists and Other Licensed Providers)	MCO	MCO
	FFS	DHCF
Clubhouse	MCO	DHCF
	FFS	DHCF
Recovery Support Services (RSS)	MCO	DHCF
	FFS	DHCF
\$0 Co-Pay for MAT	MCO	N/A
	FFS	N/A

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For questions regarding this transmittal, contact Abby Kahn, Compliance Officer, Division of Quality and Health Outcomes, at abigail.kahn@dc.gov or (202) 442-4650.

cc: Medical Society of the District of Columbia
DC Hospital Association
DC Primary Care Association
DC Health Care Association
DC Home Care Association
DC Behavioral Health Association
DC Coalition of Disability Service Providers

