SUD Fiscal Issues & Updates

Victor Kogler, CIBHS
Paula Wilhelm, CBHDA

CIBHS Fiscal Leadership Institute
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Who’s in the room?

• How many are:
  ▪ New to SUD finance?
  ▪ DMC-ODS opt-in counties?
  ▪ Currently providing ODS services?
  ▪ Newly contracted/certified to provide DMC services?
Agenda

1. Whirlwind Tour: Key Resources
2. Recent Fiscal Guidance from DHCS
3. SUD/DMC “Hot Issues”
4. Q & A and Discussion
Whirlwind Tour: Key Resources
ODS resource pages

- **DHCS DMC-ODS homepage**

- **DMC-ODS STCs and CPE protocol**
  - [http://www.dhcs.ca.gov/provgovpart/Pages/Special-Terms-and-Conditions.aspx](http://www.dhcs.ca.gov/provgovpart/Pages/Special-Terms-and-Conditions.aspx)

- **DMC-ODS webinars**
  - [https://www.dhcs.ca.gov/provgovpart/Pages/DMC_ODS_Webinars.aspx](https://www.dhcs.ca.gov/provgovpart/Pages/DMC_ODS_Webinars.aspx)
  - Includes presentation on ODS claiming and extensive 3-part fiscal overview

- **Fact Sheets, FAQs, and Information Notices**
  - [http://www.dhcs.ca.gov/provgovpart/Pages/FAQs_Fact_Sheets.aspx](http://www.dhcs.ca.gov/provgovpart/Pages/FAQs_Fact_Sheets.aspx)
  - Includes FAQs on billing and fiscal considerations

- **CIBHS waiver trainings homepage**
  - [https://www.cibhs.org/dmc-ods-waiver-trainings](https://www.cibhs.org/dmc-ods-waiver-trainings)

- **CBHDA committee pages**
  - [https://www.cbhda.org/members/](https://www.cbhda.org/members/)
    - SAPT
    - Medi-Cal Policy
    - Financial Services
DMC resource pages

• MHSUDS Information Notices (current & archived)
  ▪ http://www.dhcs.ca.gov/formsandpubs/Pages/MHSUDS-Information-Notices.aspx

• Drug Medi-Cal Forms
  ▪ http://www.dhcs.ca.gov/formsandpubs/forms/Pages/DMC-Forms.aspx

• SUD Directories
  ▪ http://www.dhcs.ca.gov/provgovpart/Pages/SUD-Directories.aspx
    ✓ Includes directories of county AOD Administrators and beneficiary access lines

• DMC Provider Billing Manual

• DMC Title 22 Regulations
  ▪ http://www.dhcs.ca.gov/services/advPages/CA_Code_Regulations.shtml.aspx
    ✓ Or try Title 22 Training (2016) or Title 22 FAQs

• SUD Cost Report Manual (Fall 2017) and DHCS Cost Report page
  ▪ https://www.dhcs.ca.gov/provgovpart/Pages/Fiscal_Management.aspx
SABG resource pages

• Substance Abuse Block Grant (SABG) home page
  ▪ https://www.dhcs.ca.gov/provgovpart/Pages/Substance-Abuse-Block-Grant-SABG.aspx

• Federal Block Grants pages
  ▪ https://www.samhsa.gov/grants/block-grants

• Resources from recent DHCS webinars

• Important SABG Information Notices
  ▪ 17-047: SABG Coverage Gaps in DMC and DMC-ODS Services
  ▪ 17-013: Allocation of Funding for SUD PPFD, FY 2017-18
    ✓ Attachments include allocation summary, funds exchange methodology, and spending periods
  ▪ 16-059: SABG Room & Board for Transitional Housing, Recovery Residences, & Residential Treatment

COMING SOON: SABG Manual
Recent fiscal guidance from DHCS
SUD fiscal information notices – Latest guidance and “Greatest Hits”

- **18-055**: Amendment of CCR Title 22, Section 51490.1 (DMC billing timeframe)
- 18-052: Delay in SD Claims Processing for Buprenorphine/Naloxone under the DMC-ODS
- **18-051**: DMC-ODS Transition of Care Policy
- **18-047**: RESCIND - Information Notice 18-039 (CalOMS Tx) - Direct Providers to County Contracted Providers
- **18-037**: DMC Reimbursement Rates for FY 2018-19
- **18-036**: MAT Reimbursement Rates for FY 2018-19 under the DMC-ODS
- 18-030: Processing Split Claims in the Short Doyle Medi-Cal System
- 18-023: DMC-ODS Cost Reporting Requirements for Narcotic Treatment Programs
- 18-018: Fiscal Year 2015-16 Behavioral Health Services Growth Special Account Allocations
- **18-009**: Diversion of County Behavioral Health Subaccount (BHS) Allocations for Drug Medi-Cal Services
- 18-005: Drug Medi-Cal Organized Delivery System Case Management for Care Coordination Claiming
- 18-004: Implementation of Assembly Bill AB 395 for Narcotic Treatment Programs
- **18-001**: Drug Medi-Cal Organized Delivery System Residential Reimbursement
- 17-045: (*Supersedes 17-002) DMC-ODS Healthcare Common Procedure Coding System and Modifiers
- 17-043: Rejection of Uncertified Drug Medi-Cal Claim Files
- **17-039**: (*Supersedes 17-023) Changing Same-Day Billing Requirements for DMC-ODS Counties
- **17-038**: Updated Drug Medi-Cal Billing Manual
- **17-036**: Drug Medi-Cal County of Responsibility Transition
- 17-034: ICD-10 SUD Remission Codes for the DMC-ODS
Coming Soon:

• Contracts
  ▪ State-plan (non-ODS) DMC contracts - effective July 1, 2018
  ▪ SABG contract amendments – effective January 1, 2019

• Recent DRAFT Information Notices
  ▪ NTP Cost Reporting Policy
  ▪ SABG Room and Board Requirements (Updates previous guidance)
  ▪ SABG New Payment & Reporting Requirements
  ▪ ODS Residential Length of Stay (Updates previous guidance)
  ▪ ODS Provider Selection and Appeals Process (Updates previous guidance)

SABG Manual!
SUD “Hot Topics”
SUD Hot Topics

• Changes to federal block grant (SABG) distribution and oversight
• County-of-Residence/County-of-Service
  ▪ NTP claims
  ▪ Courtesy dosing
• Cost Reports for NTPs
• IN 18-009 and DMC Compliance
• EPSDT and youth SUD services
• ODS implementation

What would you add to the list?
Substance Abuse Block Grant (SABG) Distribution & Oversight Changes

• SABG (formerly SAPT) funding is a payer of last resort and cannot supplant DMC or other state funding of SUD prevention and treatment programs.

• DHCS has begun to implement a statewide corrective action plan (CAP) prompted by an audit of the Department’s management of federal SABG funds.

• Changes to SABG distribution and oversight processes will include:
  ▪ Annual budgets and quarterly invoicing for SABG funds
  ▪ More frequent fiscal audits (conducted by DHCS A&I team)
  ▪ Updated contract language
  ▪ Revision of SABG allocation methodology

• Many/most counties will need to adjust their SABG spending.
County-of-Residence/County-of-Service

• 2011 Realignment BHS allocations are now based on DMC claims for county residents rather than those who received services within county lines.

• Counties are fiscally responsible for services for their own residents.
  ▪ see [IN 17-036: DMC County-of-Residence Transition](#)

• Only residents of DMC-ODS counties are entitled to DMC-ODS services.

• State-plan (non-ODS) counties may choose to continue to submit claims for out-of-county beneficiaries for any type of service (claims will be allowed).

• DMC-ODS counties may choose to continue to submit claims for out-of-county beneficiaries for two types of services only: 1) NTP and 2) EPSDT.

• Updated DMC boilerplates will include language to address billing for NTP courtesy dosing.
Cost Reports for NTPs

• Currently, if an NTP in a DMC-ODS Waiver County provides Waiver-defined benefits under an interim rate in a given fiscal year, a cost report for the entire program is required.
  ▪ These interim rate waiver benefits are case management, physician consultation, and recovery services. See IN 18-023: DMC-ODS Cost-Reporting Requirements for NTPs.

• Historically, a cost report has not been required if an NTP bills for State Plan benefits (Methadone Dosing and Counseling) or MAT at the rate established by DHCS, whether in a State Plan or Waiver county.

• Pending DHCS guidance now states that full cost reports will be required for all NTPs unless they meet one or more of the following exceptions:
  ▪ An NTP provider that exclusively bills the State or county for services provided to individuals subject to PC Section 1210.1 (probation);
  ▪ An NTP provider that exclusively bills the State or county for services provided to individuals subject to PC Section 3063.1 (parole); and
  ▪ An NTP provider that exclusively bills the State or county for services provided to individuals subject to WIC Section 14021.52 (indigent patients who are not eligible for Medi-Cal.)
IN 18-009 and DMC Compliance

• **IN 18-009:** Diversion of County Behavioral Health Subaccount (BHS) Allocations for Drug Medi-Cal Services:
  - If a county *fails to arrange, provide or subcontract* for any of the following DMC covered services, the State may elect to divert county BHS funds to pay for DMC services provided to those residents.
    ✓ Outpatient drug-free treatment;
    ✓ Narcotic replacement therapy;
    ✓ Naltrexone treatment;
    ✓ Intensive Outpatient Treatment; and
    ✓ Perinatal Residential Substance Abuse Services (excluding room and board).

• Providing these SUD services outside of the DMC delivery system (i.e., declining to bill DMC) does not fulfill a county’s contractual obligation for administering the DMC program.

• Counties not providing all services were to submit CAPs by June 1. Counties that were not yet participating in DMC had until September 30 to enter into state-county DMC contracts.
EPSDT & Youth SUD Services

• Medi-Cal eligible youth under 21 years of age are entitled to medically necessary SUD services under the federal Medicaid Early and Periodic Screening, Diagnosis and Treatment benefit.

• EPSDT SUD services are delivered through the Drug Medi-Cal delivery system.
  ▪ In ODS counties, EPSDT-specific billing codes are not needed (full continuum of services should be available under the ODS).
  ▪ In non-ODS counties, youth may be eligible for some SUD services not covered by California’s Medicaid state plan.
    ✓ See DHCS IN 16-063 on billing for youth residential treatment in state plan counties.

• For a primer on youth SUD treatment in California and related fiscal and policy issues, see:
  ▪ California’s Public Substance Use Disorder Treatment System for Youth: An Overview (Harbage Consulting)
    ✓ Some services covered under Medi-Cal Minor Consent: state-only program not eligible for FFP and distinct from federal EPSDT.
What questions do you have for each other?
Contact Information

Victor Kogler, Vice President, CIBHS
vkogler@cibhs.org

Paula Wilhelm, Senior Policy Analyst
pwilhelm@cbhda.org