

5/10/17 Webinar Questions

- 1) I need to clarify, MSG's may bill the H2021 for face to face therapy, but the actual provider MUST be licensed (i.e. LBA, LABA). An MSG cannot bill for ABA using a CSA performing H2021 and billing under the licensure of an LBA.

That is correct. Only licensed professionals may bill H2021 in an MSG. You must be a licensed agency, e.g. a Behavioral Health Services Organization or a Community Mental Health Center to bill for a Community Support Associate.

- 2) I am a behavior analyst that works for a Multi-Specialty Group (MSG). We would like to offer comprehensive behavioral services but are unsure how to bill for our Registered Behavior Technicians. As an MSG, can we bill for our RBTs using the H2021 code? Is there a limit to the number of hours that can be offered via comprehensive community support service? For example, is 30-40 hours a week allowed?

Registered Behavior Technicians are not providers within an MSG for the Kentucky Medicaid program. Only a licensed behavior analyst or a licensed assistant behavior analyst may provide services in an MSG. See slides 21 and 22 of the webinar.

The number of hours of comprehensive community support services is based on medical necessity and will vary depending the member's needs. These services must be prior authorized. Once the assessment is completed, the provider should follow the procedures outlined in the webinar to obtain the authorization necessary. See slides 26 and 27.

- 3) How would we bill for RBT's?

As noted in the webinar, RBTs are not recognized providers within the Kentucky Department of Medicaid's state plan. RBTs may qualify as community support associates. Slide 21 of the webinar contains a link to the requirements for a community support associate (CSA). If the RBT qualifies as an CSA, then the billing procedure is the same as for other professionals and services.

- 4) Does the Mobile Health Clinic licensure enable you to bill for RBT/Community Support Services?

The regulation for Mobile Health Clinic services is 907 KAR 20:275. This regulation does not include service standards for billing behavioral health services. Please consult the regulations identified on Slides 7 and 8 for information on who can bill community support services. See the answer to question #3 for further information on RBTs.

- 5) As an Licensed Professional Counselor Associate under supervision of a board approved supervisor, are you able to apply as a provider for Passport?

Licensed Professional Counselor Associates (LPCAs) are considered a “behavioral health practitioner under supervision” by the Kentucky Department of Medicaid and may provide services in all the categories of licensure discussed in the webinar (i.e., provider groups, MSGs, BHSOs, and CMHCs). LPCAs must be supervised by an independently licensed practitioner and the supervisor’s NPI and taxonomy numbers must be on the claim. Supervisor would depend on board licensure requirements of individual under supervision and the individual doing the supervision (example: Psychologist cannot supervise an LPCA)