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From: DmhDBN <mareynolds@odmhsas.org>
Sent: Wednesday, June 01, 2016 3:52 PM
To: Reynolds, Mark A
Subject: Change in limits for psychotherapy and service plan updates provided by Outpatient Behavioral Health Agencies

Global notification: <https://www.okhca.org/providers.aspx?id=112>

Limitation on service plans - Effective June 1, 2016, service plan updates will only be reimbursable every six (6) months.

Reduction in limits for psychotherapy provided in Outpatient Behavioral Health Agencies – Outpatient behavioral health agency rules are amended in order to set daily and weekly limits for the amount of individual, group and family psychotherapy that are reimbursable by SoonerCare or ODMHSAS. The current daily limits of 6 units of individual, 12 units of group and 12 units of family therapies will be reduced to 4 units, 6 units and 4 units respectively. Additionally, weekly limits will be imposed that limit the total amount of group therapy in a week to 3 hours and Individual and Family therapy will cumulatively be limited to 2 hours per week. These emergency revisions are necessary to reduce the Oklahoma Department of Mental Health Substance Abuse Services` operations budget for the remainder of SFY 2016 in order to meet the balanced budget requirements as mandated by State law. Without the recommended revisions, the Department is at risk of exhausting its State appropriated dollars required to maintain the State`s Behavioral Health Program.

Guidance

The weekly limits run from Sunday to Saturday, regardless of month or holidays.

The weekly limits for individual/family and group therapy are separate. For example, a consumer may receive up to 8 units of individual and/or family therapy AND up to 12 units of group therapy in a week.

For individual or family therapy, there are multiple ways the limits can be used. Family therapy and Individual therapy can be billed on the same day, but neither can exceed 4 units in a day or 8 units in a week. Although the list below is not all inclusive of every scenario, here are some examples:

1. Individual therapy at 4 units on one day and individual therapy at 4 units on another day.
2. Individual therapy at 4 units on one day and 4 units of family therapy on the same day.
3. Individual therapy at 4 units on one day and 4 units of family therapy on another day.
4. Family therapy at 4 units on one day and family therapy at 4 units on another day.
5. Individual therapy at 3 units on one day, family therapy at 3 units of another day, and 2 units of family therapy on another day.

For group therapy, the daily limit is 6 units and the weekly limit is 12 units. Here are some possible examples:

1. Group therapy at 6 units on one day and 6 units of group therapy on another day.
2. Group therapy at 4 units on one day, 4 units of group therapy on another day and 4 units of group therapy on a different day.

Intent

While ODMHAS understands that these changes will impact the way in which you provide services to clients,

these changes are necessary in order for ODMHSAS to meet its constitutionally mandated balanced budget requirement after Oklahoma experienced several budget shortfalls in state fiscal year 2016. Reimbursement for therapy services accounts for over half of all outpatient behavioral health expenses and while these services have been held harmless during the last several rounds of budget cuts, we were left with no options this time.

Providers should be aware that ODMHSAS and OHCA will diligently monitor utilization trends after these changes go into effect to identify any outliers in service provision that may be a result of provider cost-shifting in order to accommodate losses in revenue due to these changes. For example, if a LBHP has consistently billed 6 units of individual therapy per client prior to the changes and begins consistently billing 4 units of individual therapy and 2 units of case management per client after the changes, this will be viewed as an outlier and may be subject to review to determine whether the services were medically necessary and appropriate.