



SANDHILLS CENTER

Managing Mental Health, Intellectual/Developmental Disabilities and Substance Abuse Services
910-673-9111 (FAX) 910-673-6202 www.sandhillscenter.org Victoria Whitt, CEO

DATE: March 25, 2020
TO: Sandhills Center Provider Network
FROM: Victoria Whitt, CEO
RE: Program and Payment Changes in Response to COVID-19

Sandhills Center appreciates the work of our Provider Network in continuing critical behavioral health services to our communities during the difficult times associated with the spread of COVID-19. Along with the steps already taken to assist providers during this situation, Sandhills Center is today announcing the programmatic and payment changes below to help strengthen and solidify our network of services.

State and Local Funds

Historically, Sandhills Center has maintained a variety of contracts with providers, including Unit Cost Reimbursement (UCR), 1/12th contracts paid evenly during the year, and Non-UCR paid on invoice showing expenses related to the services provided. For contracts that were not paid based on UCR services, shadow claims are submitted to monitor the services provided. During the current situation, Sandhills Center will continue to pay the 1/12th and Non-UCR contracts as usual and understands the volume of shadow claims submitted may be lower if service levels have declined during the COVID-19 pandemic.

State and locally funded UCR contracts will experience the greatest disruption in cash flow if service levels decline. Therefore, Sandhills Center has reviewed the monthly billing for the fiscal year to date for all of the UCR contracts with a maximum exposure amount greater than \$100,000. We intend to leave all of those contracts in place to allow any UCR services billed to be paid through the usual process. We are planning to add to each provider, with an effected contract, a Non-UCR amount based on average billing for the current fiscal year, as funding is available. That non-UCR supplement will be billed on invoice. The funding will cover staff time and other program expenses needed to ensure the availability of previously contracted behavioral health services in our local communities during the COVID-19 pandemic. The amount invoiced should reflect the amount of program expenses during the pandemic less any program revenue billed through other Federal, State, local or 3rd party funding. Sandhills Center will reach out to each provider with the Non-UCR amount specific to the individual provider.

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Medicaid Funds

The North Carolina Department of Health and Human Services (NC DHHS) letter, dated March 20, 2020, announced the flexibility offered to LME-MCOs to use up to 15% from their current risk-reserves for supporting providers who are accepting referrals, maintaining consumers in their existing residential placements, utilizing telehealth capabilities to the maximum extent possible, providing services that keep consumers from needing access to emergency departments and inpatient services and otherwise making efforts to deliver high quality services during this crisis.

Sandhills Center is using the flexibility granted to offer a 15% reimbursement rate increase for Medicaid funded residential services, with dates of service on and after April 1, 2020. The increased rate is planned to last through June 30, 2020, or as later amended by Sandhills Center. Medicaid funded residential services receiving this temporary enhancement include:

Psychiatric Residential Treatment Facilities
Behavioral Health Long Term Residential
Innovations Residential Services (Residential Supports 1-4, Supported Living 1-3 and Supported Living Periodic)
Community Based Intermediate Care Facilities

The additional Medicaid services listed below will also receive a 15% reimbursement rate increase for the same dates of service:

Assertive Community Treatment Team
Community Support Team
Psychosocial Rehabilitation Services

Finally, all other Medicaid services will receive a 5% increase, again for the same effective dates of service listed above.

It is our expectation that additional revenue generated from the temporary enhanced service rates will be used to supplement direct care staff costs during this time. We reserve the right to conduct a post payment review of providers to ensure compliance with this expectation.

Early and Periodic Screening, Diagnostic and Treatment (EPSDT)

As a reminder, the Early and Periodic Screening, Diagnostic and Treatment (EPSDT) benefit provides comprehensive and preventive health care services for children under age 21 who are enrolled in Medicaid. EPSDT requires that any additional health care services that are coverable under the Federal Medicaid program be provided if they are found to be medically necessary to treat, correct or reduce illnesses and conditions discovered regardless of whether the service is covered in a state's Medicaid plan. Medical necessity must be determined on a case-by-case basis.

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During the response to COVID-19, Sandhills Center recognizes the challenges of providing community behavioral health services while implementing the social distancing and other mitigation efforts recommended by NC DHHS and the Centers for Disease Control and Prevention (CDC). To assist in ensuring service availability during this crisis, Sandhills Center is encouraging providers to use EPSDT as appropriate to request authorization for services in a modified service delivery model, when needed. When an authorization request is submitted for an EPSDT covered member, under the age of 21 (most likely services including Day Treatment, Intensive In-Home, Multi-Systemic Therapy or Outpatient Services), the requesting provider should include in the authorization request the specific modifications to the usual service delivery model that are being considered to help mitigate the spread of the COVID-19 virus. Requests will be considered using the EPSDT criteria on a case by case basis as they are submitted for review.

Outpatient Services

Sandhills Center is following the guidance issued by NC DHHS in [Special Bulletin COVID-19 #9: Telehealth Provisions – Clinical Policy Modification](#). Providers can bill for allowed services as described in this Medicaid Bulletin beginning March 23, 2020, for dates of service on or after March 10, 2020.

The United States Department of Health and Human Services (US DHHS) has indicated the announced telehealth provisions allow covered health care providers that want to use audio or video communication technology to provide telehealth to patients during the COVID-19 nationwide public health emergency to use any non-public facing remote communication product that is available to communicate with patients. Covered health care providers may use popular applications that allow for video chats, including Apple FaceTime, Facebook Messenger video chat, Google Hangouts video, or Skype to provide telehealth without risk that the Office of Civil Rights (OCR) might seek to impose a penalty for noncompliance with the HIPAA Rules related to the good faith provision of telehealth during the COVID-19 nationwide public health emergency.

The codes announced in the Special Bulletin are being automatically added to all providers' contracts that currently contain the standard Outpatient Service CPT codes or the E&M codes. Provider Network and Finance staff are prioritizing the addition of these codes for provider use as quickly as possible.

Special Bulletin #9 includes the eligible providers who can offer the telemedicine and telepsychiatry services listed, including clinical pharmacists, licensed clinical social workers (LCSWs), licensed clinical mental health counselors (LCMHCs), licensed marriage and family therapists (LMFTs), licensed clinical addiction specialists (LCASs) and licensed psychological associates (LPAs). Additionally, the telephone assessment and management codes included in the Special Bulletin expand the list of eligible providers for those services to include a listing of associate level clinicians.

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When billing the codes, it is important to bill with a GT modifier to indicate the service has been provided via interactive audio-visual communication. This modifier is not appropriate for services performed telephonically or through email or patient portal. A modifier CR (catastrophe/disaster related) must be included for codes listed in the policy to relax frequency limitations defined in code definitions.

Telehealth and telepsychiatry claims should be filed with Place of Service (POS) 02 (telehealth). If providing the service from the staff's home, that is operating as a temporary office, the place of service for office POS (11) should continue to be used.

Opioid Treatment Services

To allow Opioid Treatment providers to continue services to our members and take the precautionary measures outlined by The Centers for Disease Control and Prevention (CDC), Sandhills Center will temporarily allow reimbursement for additional take-home doses of methadone and buprenorphine for members receiving Opioid Treatment (H0020). This will allow reimbursement of doses typically received on site to be provided off site via take-home doses if there is no other method for reimbursement of the medication costs. To simplify this process and not require additional coding changes at this time, providers can bill the number of units per day equivalent to the number of doses.

Providers may review the guidance issued by [The Substance Abuse and Mental Health Services Administration \(SAMHSA\)](#) for additional information.

It is Sandhills Center's expectation that Opioid Treatment providers ensure quality care and close oversight of member progress, clinical and crisis planning and member appropriateness for increased off-site dosing as determined by the provider's medical staff. Providers may use the approved telephonic codes or telehealth codes as appropriate to support the member as well.

Provider Administrative Workload

As a reminder to the information previously announced, Sandhills Center is focused on reducing administrative work for our providers during this time. In an effort to assist you in reducing the number of visitors to your facilities, Sandhills Center has temporarily suspended all external audits, reviews and oversight monitoring, except for reviews involving member health and safety, that would require travel to your site. The desktop review process will continue during this suspension to expedite the conclusion of each in progress review when appropriate.

Again, Sandhills Center appreciates the important work our network is doing in response to the current situation. Our commitment to our network is to continue to

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review any flexibility that can be offered to providers to reduce administrative and regulatory requirements as we move forward. We will announce further information as it is available.

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