



Commonwealth of Massachusetts
Executive Office of Health and Human Services
Office of Medicaid
www.mass.gov/masshealth

MassHealth
Mental Health Center Bulletin 34
June 2020

TO: Mental Health Centers Participating in MassHealth

FROM: Amanda Cassel Kraft, Acting Medicaid Director

RE: UPDATE: Mental Health Center Transformation Incentive Payments

Introduction

This bulletin updates *Mental Health Center Bulletin 32*. Changes include:

- Addition to payment eligibility requirements
- Revisions to performance requirements, including clarification that providers may earn partial payment based on partial performance

Overview

MassHealth's mission is to improve the health outcomes of our diverse members and their families by providing access to integrated health care services that sustainably and equitably promote health, well-being, independence, and quality of life. In support of that mission, MassHealth provides broad coverage of medically necessary health care services to its members. MassHealth partners with a wide variety of service providers, including vital safety net providers, to offer its members access.

In light of the state of emergency declared in the Commonwealth due to the 2019 novel Coronavirus (COVID-19) outbreak, MassHealth is disbursing critical stabilization funding to support health care providers impacted by and responding to COVID-19. These providers are on the front lines of caring for MassHealth members.

As part of these efforts, MassHealth has established a program of mental health center payments that will be implemented by MassHealth's behavioral health vendor (the Massachusetts Behavioral Health Partnership). The payments are intended to support eligible providers as they transition from delivering in-person services to MassHealth members to using other care delivery modalities in response to the COVID-19 emergency.

In Contract Year 2020 (January 1, 2020, to December 31, 2020), the behavioral health vendor is required to make payments to eligible mental health centers (MHCs) that meet certain performance measures set forth in the behavioral health vendor's contract with MassHealth. Specifically, MHCs must submit required reports to the behavioral health vendor, who will review the submissions and share them with MassHealth. MassHealth will direct the behavioral health vendor to make payments to each eligible provider based on the provider's performance on the measures and each provider's proportion of patient service revenue relative to the full class of eligible providers.

Eligible Providers

An MHC is eligible to earn payments under this incentive program if it meets all of the following criteria:

- The MHC is enrolled in MassHealth as a provider of mental health center services pursuant to 130 CMR 429.000;
- The MHC is contracted with the behavioral health vendor as a mental health clinic; and
- The MHC is not a community health center participating in MassHealth pursuant to 130 CMR 405.000 or a hospital-licensed health center participating in MassHealth pursuant to 130 CMR 410.000.
- The MHC attests to the following prior to receipt of payment:
 - Completion of specific training for all clinical and administrative staff involved in the delivery of services via telehealth in response to the COVID-19 crisis. Trainings include use of the technology, delivery of services in a confidential manner, documentation of interventions, and use of appropriate billing procedures.
 - Updated clinic policies and procedures that are impacted by the use of telehealth in response to the COVID-19 crisis. Policies and procedures that must be updated include doing intakes, assessing patients, providing treatment including medications and therapy, maintaining records, referring for other care, and conducting supervision.
 - Investment in infrastructure or training to improve ability to render care in response to the COVID-19 crisis including via telehealth and changes to in-person care. Investments include purchase of phones, computers, and a technology platform for telehealth.

Performance Measure

MassHealth continues to enhance access to care for MassHealth members during the COVID-19 public health emergency. Supporting providers in the transition from in-person care to other, remote treatment modalities is a critical component of these efforts. As such, the behavioral health vendor will be required to provide payments under this incentive program to eligible providers that transition to delivery of a material portion of behavioral health services via telehealth as set forth below.

The percent of total payment that an eligible provider can earn will be determined by the percent of paid units delivered via telehealth:

- Eligible providers will earn the full amount of the total payment if, for dates of service between April 1, 2020, and July 31, 2020, 15% or more of their paid encounters are conducted via telehealth, as indicated by the code POS02 on claims submitted.
- Providers conducting less than 15% of visits via telehealth can earn partial payment, e.g.:
 - A provider conducting 3% of visits via telehealth would earn 20% of total payment ($3\% / 15\% = 20\%$).
 - A provider conducting 7.5% of visits via telehealth would earn 50% of total payment ($7.5\% / 15\% = 50\%$).

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Payments

In the aggregate, the behavioral health vendor is required to pay eligible providers a total of \$94 million subject to successful completion of performance measure described above. Total payments to each provider will be determined by MassHealth based on each MHC's pro-rata share of statewide Medicaid managed and non-managed patient service revenue between July 1, 2018, and June 30, 2019.

As an example, a MHC with managed and non-managed Medicaid revenue that accounts for 10% of all qualifying providers' Medicaid revenue in the state between July 1, 2018, and June 30, 2019, would be able to earn a maximum of \$9.4 million in total payments, or 10% of \$94 million. Actual earned payments are contingent on the provider's performance under the incentive program.

The behavioral health vendor will make interim payments to providers on a monthly basis in May, June, and July 2020. Final payments are subject to reconciliation based on each provider's performance. The Executive Office of Health and Human Services (EOHHS) anticipates that qualifying providers will receive 95% of expected total payments over the course of monthly payments, with 5% reserved for reconciliation based on performance.

Requirements for Behavioral Health Services Delivered via Telehealth

The delivery of clinically appropriate, medically necessary MassHealth-covered behavioral health services to MassHealth members via telehealth must comply with all applicable requirements, including but not limited to, those set forth in [All Provider Bulletins 289](#) and [291](#).

MassHealth Website

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Questions

If you have any questions about the information in this bulletin, please contact the MassHealth Customer Service Center at (800) 841-2900, email your inquiry to providersupport@mahealth.net, or fax your inquiry to (617) 988-8974.