

September 8, 2021

**ILLINOIS HEALTH AND HOSPITAL ASSOCIATION
M E M O R A N D U M**

SUBJECT: Behavioral Health Update and Resources

Below are several updates concerning hospital and health system behavioral healthcare focused on Medicaid, care coordination, COVID-19, and recent IHA comment letters to government agencies.

Medicaid Updates

YouthCare Reimbursement

YouthCare HealthChoice Illinois sent a notice dated August 2 to providers that the Medicaid managed care organization (MCO) will pay Beyond Medical Necessity (BMN) days in hospitals for YouthCare members effective for claims on or after September 1, 2020. BMN payments start the day after discharge for the medical stay. This policy applies to youth in care and [former youth in care](#) enrolled in YouthCare, but does not apply to youth lockouts, when a parent or guardian has refused to permit a youth to return home upon discharge from a hospital, or make provisions for an alternative living arrangement. Formerly, these payments were being made by the Illinois Department of Children and Family Services (DCFS). Effective the 11th day BMN, DCFS is required to cover the DCFS per diem rate for youth lockout inpatient psychiatric stays at a free-standing psychiatric hospital or a hospital with a pediatric or adolescent inpatient psychiatric unit ([Public Act 102-0201](#)). For YouthCare, clinical reviews will occur every seven days for all BMN youth. Clinical documentation should be submitted to YouthCare Utilization Management via fax: Behavioral Health, 1-833-387-3173 or primary medical health, 1-844-989-0154. For more information, please call YouthCare at 1-844-289-2264. See the [YouthCare Notice](#) for more information.

System of Care for Children with Complex Needs

The Illinois Department of Healthcare and Family Services (HFS) is preparing to launch [Pathways to Success](#), a program for Medicaid-enrolled children under the age of 21 who have complex behavioral health needs and could benefit from additional support. The program, targeted to launch on March 1, 2022, provides access to an evidence-informed model of intensive care coordination and additional home and community-based services. For more information on qualifications for care coordination and support organizations, provider rates, and programmatic utilization estimates, please see Pathways' [Provider webpage](#). For updated information on Medicaid Home and Community-Based Services (HCBS) programs, see the

[Statewide Transition Plan](#) webpage, which outlines the state's plan to bring its HCBS delivery system into compliance with the federal regulations by the required deadline of March 17, 2022.

Telehealth Billing Updates for Behavioral Health Services

On Sept. 1, HFS released a [Provider Notice](#) on telehealth billing updates for community mental health centers, behavioral health clinics, physicians, licensed clinical psychologists, and licensed clinical social workers for telehealth claims billed under the Medicaid fee-for-service program and the managed care plans.

Additional assistance and insight on key billing issues is available through membership in the IHA Patient Financial Services group. For information on services or membership, [contact IHA](#).

HFS Attestation of Compliance with Provider Network Adequacy Requirements

On Aug. 31, HFS released a [Provider Notice](#) attesting that the Department is in compliance with access for treatment of mental health and substance use disorders, and provider network adequacy as required by [Public Act 102-0144](#). See IHA's [End of Session Memo](#) (p. 13, Senate Bill 471) for a summary of the new state law.

988 Crisis Hotline Planning Update

As summarized in a July 15 [Member Memo](#), the '988' mental health crisis line was created by the National Suicide Hotline Act of 2018 ([Public Law 115-233](#)), was [designated as](#) a national hotline by the Federal Communications Commission (FCC) in 2020, and will be operationalized on July 16, 2022. Texting to 988 remains in the FCC rulemaking process. The roll out for texting implementation may be delayed after the July 2022 start date for the crisis line. New recordings of August stakeholder coalition meetings are available on the Illinois Dept. of Human Services [988 Planning webpage](#), along with numerous resources.

New Mental Health Professionals Guide to Their Role in the Criminal Justice System

The American Psychiatric Association Foundation has a new resource to help professionals better support community members facing mental health challenges, [Mental Health Professionals Guide to Their Role in the Criminal Justice System: A Quick Reference Pocket Guide for Mental Health Professionals](#). The Guide includes an overview of the criminal justice system and specific roles mental health professionals can play in supporting community members at different stages of the system.

COVID-19 Updates

Flex Beds During COVID-19

As a reminder, hospitals that need to add to their psychiatric bed capacity or convert (flex) beds to accommodate during peak periods and meet patient demand do not need a Certificate of Need during the COVID-19 pandemic. Notification must be given to the Illinois Health Facilities

and Services Review Board and the Illinois Department of Public Health. More information can be found [here](#).

State Mental Health Resources

Please see the [Help is Here: Talk to Someone](#) webpage coordinated by the Illinois Department of Human Services for a broad variety of mental health resources.

SAMHSA Training and Technical Assistance Related To COVID-19

SAMHSA is committed to providing regular [training and technical assistance](#) (TTA) on matters related to the mental health and substance use disorder field as they deal with COVID-19. View the updated available TTA resources to assist with the current situation.

Recent IHA Behavioral Health Advocacy

CY 2022 Medicare PFS Proposed Rule

On Sept. 1, IHA sent a [comment letter](#) to the Centers for Medicare & Medicaid Services (CMS) on the calendar year (CY) 2022 Medicare Physician Fee Schedule (PFS) proposed rule. IHA urged CMS to permit healthcare professionals to determine appropriate use of audio-only telehealth for mental health services, supported the proposed use of a modifier to track service use while refraining from additional documentation requirements, and discouraged a proposed in-person care requirement every six months that is not required by law.

EMS Transport to Mental Health Facilities

On Aug. 30, IHA sent a [comment letter](#) to the Illinois Department of Public Health (IDPH) regarding the implementation of [Public Act 102-0623](#) (Sen. Melina Bush/Rep. Deb Conroy), which amended the Emergency Medical Services (EMS) Systems Act ([210 ILCS 50/](#)) to permit bypass/diversion from the closest emergency department to “transport to the closest or appropriate EMS System-approved mental health facility”. Given the broad impact this law will have on emergency response to patient evaluation and treatment, IHA requested that IDPH release guidance on plans for administrative rules to implement Section 3.155(i) of the EMS Systems Act.

For questions or comments, please [contact IHA](#).