




MassHealth
Mental Health Center Bulletin 32
May 2020

TO: Mental Health Centers Participating in MassHealth

FROM: Amanda Cassel Kraft, Acting Medicaid Director 

RE: Mental Health Center Transformation Incentive Payments

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, in order 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;
- 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 or a Hospital Licensed Health Center participating in MassHealth pursuant to 130 CMR 410.

Performance Measures

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 meet the performance requirements described below.

As described in the table below, each deliverable is tied to a percent of the total payment that an eligible provider can earn. The percentages listed in the column “Percent of payment at risk” indicate the portion of a payment amount that would be lost if an eligible provider fails to meet the performance requirement. For example, if an eligible provider fails to satisfactorily complete the first performance requirement but completes the second, third, and fourth, that provider would receive 85% of the total payment.

	PERFORMANCE REQUIREMENT	REQUIRED DELIVERABLES	REPORT TO BEHAVIORAL HEALTH VENDOR	PERCENT OF PAYMENT AT RISK
1	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.	Submit attestation of completion to the behavioral health vendor on time	July 1, 2020	15%
2	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 intake, assessment, provision of treatment including medications and therapy, maintaining records, referring for other care, and conducting supervision.	Submit attestation of completion to the behavioral health vendor on time	July 1, 2020	15%
3	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 technology platform for telehealth.	Submit attestation of completion to the behavioral health vendor on time	July 1, 2020	15%
4	Transition to delivery of a material portion of behavioral health services via telehealth modalities.	Meet or exceed the threshold of 15% of all billed units delivered via telehealth as indicated by POS02 in claims submitted between April 1, 2020 and July 31, 2020	August 1, 2020	55%

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 measures described above. Total payments to each provider will be determined by MassHealth based on each MHC's pro rata share of state-wide 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 April, May, June, and July. Final payments are subject to reconciliation based on each provider's performance. EOHHS anticipates that qualifying providers will receive 95% of expected total payments over the course of four 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

This bulletin is available on the MassHealth website at www.mass.gov/masshealth-provider-bulletins.

To sign up to receive email alerts when MassHealth issues new bulletins and transmittal letters, send a blank email to join-masshealth-provider-pubs@listserv.state.ma.us. No text in the body or subject line is needed.

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.