May 29, 2012

Aloha Providers,

 As you know, Medicaid billing regulations do not allow two providers to bill for the same service for the same client during the same time period.

 Nonetheless, one of the changes incorporated into the Orange Book standards for both *Intensive In-Home Therapy* and *Intensive Independent Living Skills* specifically allows therapists (MHPs or QMHPs) and paraprofessional support workers to bill for limited time (up to 2 hours/week) spent together working directly with the youth/family.

The purpose of this regulation is to allow for better coordination of the work done by the therapist and the paraprofessional, to provide training to increase the skills of paraprofessionals, and to encourage greater use of paraprofessional workers in these services.   The plan has been that CAMHD will bill Medicaid for the therapist’s time and will pay the provider for the paraprofessional’s time *without* seeking Medicaid reimbursement for the para’s time.  The reasoning is that there will be a net savings for CAMHD if we are not paying for trained therapists to do work that could be done more appropriately by paraprofessional workers.

 However, at this time, CAMHD staff members are still working on the challenges involved in coding this overlapping activity and assuring that Medicaid is not billed inappropriately.

**CAMHD is putting on hold implementation of the regulation allowing overlapping time to be reimbursed (see Child and Adolescent Mental Health Performance Standards - Orange Book, latest version:  Pages 72, 74, 79, 80, 87, 88, 94, and 95) until we can solve these problems.  This specific part of these standards will not go into effect on July 1st, 2012.**

 To be clear, until further notice, there should be no overlapping billing by any two Providers for the same date and the same time.

CAMHD encourages each provider agency to insure that you have internal checks in place that will alert your staff when a bill is duplicated (same date, same time, whether by the same staff or by different staff).

**Carol Evans**

**CAMHD**

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