



WISCONSIN DEPARTMENT
of HEALTH SERVICES

DHS 75 SCAODA Update

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High-Level DHS 75 Description

DCTS revised Administrative Rule DHS 75, published 10/25/2021. The new chapter, which went into effect October 2022, incorporates best practice standards, establishes new SUD services, and updates requirements for existing SUD services.

This project includes implementation of 11 Medicaid coverage projects. DMS has completed 5 of 11 projects.

DMS identified changes that need to happen to prevent provider and member disruption. We also identified opportunities to expand coverage.

DHS 75 Sub-projects

- ✓ Provider Certification Implementation
- ✓ Integrated BH Stabilization 75.56
- ✓ QTTs
- ✓ Act 222
- ✓ MH SUD Outpatient Benefit Alignment
- Drug Testing
- IOP
- Concurrent Services
- Continuing Care Implementation
- Withdrawal Management Services
- OBOT

Provider Certification

DMS successfully managed DHS 75 facilities transition to their new certification numbers when the Administrative code went live in October 2022.

DMS published Update [2022-33](#) to outline providers' transition to the new code and certification numbers.
This workstream is complete.

- Effective Oct 1, 2022
- FH Update 2022-03
- Updated Provider Portal

Integrated BH Stabilization 75.56

As part of the [2022-33](#) Update, DMS allowed 75.56 facilities to be a reimbursable Place of Service for the crisis stabilization services rendered under the crisis intervention benefit.

This is an interim solution, as DMS seeks budgetary dollars to establish an integrated behavioral health stabilization benefit with withdrawal management.

This workstream is complete.

- Effective Oct 1, 2022
- FH Update 2022-33
- Interim Solution for Withdrawal Management

QTTs in DHS 75 SUD Treatment Facilities

The new DHS 75 chapter allows for Qualified Treatment Trainees to be a provider in DHS 75 certified facilities and to provide SUD treatment.

DMS published FH Update [2022-56](#) explaining this expansion. **This workstream is complete.**

- Effective Dec 1, 2022
- FH Update 2022-56

Act 222

Act 222 expanded scope of practice licensure for DSPS licensures APSW and ISWs to include SUD treatment services. DMS aligned ForwardHealth provider enrollment policy with Act 222 so that certified psychotherapists are no longer required to hold an additional SAC certification.

FH Update [2022-56](#) announced these changes.

This workstream is complete.

- Effective Dec 1, 2022
- FH Update 2022-56
- Updated Provider Portal
- Removed SAC req'mt

MH SUD Outpatient Alignment

Provider feedback and the DHS 75 rewrite brought to light that outpatient MH and SUD benefit procedure codes reimbursement rates were not equitable.

DMS published FH Update [2023-03](#) to align rates with comparable behavioral health services, and FH Update [2023-08](#) to remove the prior authorization requirement when Outpatient MH and Outpatient SUD are provided concurrently. **This workstream is complete.**

- Effective Feb 1, 2023
- FH Update 2023-03
- FH Update 2023-08

Drug Testing

DHS 75 now allows all certified providers to utilize point of care drug testing/presumptive (POCT) for members who are receiving SUD treatment.

To align FH policy with administrative code, DMS will add POCT coverage to the Outpatient SUD and SUD Day Treatment benefits.

This coverage is expected to begin in Summer 2023.

- Effective TBD
- Only for Outpatient SUD and SUD Day Treatment benefits

Drug Testing

- **Billing code: 80305**
 - once per DOS for any number of drug classes, and any number devices or procedures
 - **Allowable billers:**
 - Certified Outpatient SUD and SUD Day Tx. facilities (DHS 75.49, 75.50, 75.51, 75.52)
 - Biller must be CLIA-Waived Certified
 - Prescription will be required.
 - Other ForwardHealth SUD benefits are not impacted by these changes.
- Effective TBD
 - Only for Outpatient SUD and SUD Day Treatment benefits

SUD Intensive Outpatient (IOP)

DHS 75 created a new level of care that falls between outpatient services and day treatment services on the ASAM continuum of care.

Currently, Medicaid coverage includes outpatient and day treatment levels of care, and members may receive an IOP level of care as a variation of outpatient or day treatment services.

DMS will seek to establish policy standards and reimbursement for the *new IOP level of care*.

This project is in early discovery.

- Effective: Estimate early 2024
- FH Update required
- Systems update
- SPA TBD

Concurrent Services

DHS 75 allows members to receive services at more than one level of care at a given time (that is, concurrent services).

Currently, DMS provides coverage for concurrent services in some situations, such as Medication Assisted Treatment paired with any other level of care.

DMS will explore additional areas of coverage for medically necessary concurrent services. **Discovery work will begin after IOP.**

- Effective: Estimate late 2023 or early 2024
- FH Update required
- Systems update
- SPA TBD

Continuing Care

DHS 75 allows members to receive ongoing recovery monitoring, continuing care, or a behavioral health check-up at outpatient level of care without completing a new clinical assessment, intake, or treatment plan. This service is intended to prevent lapses in recovery.

DMS will explore parameters for continuing care coverage. **Discovery work is expected to begin after concurrent services.**

- Effective: Estimate early 2024
- FH Update required
- Systems update
- SPA TBD

Withdrawal Management

DHS 75 added residential withdrawal management and intoxication monitoring services for individuals who require 24-hour care but do not require the full resources of a hospital.

Currently, Medicaid only provides coverage for withdrawal management provided in a hospital setting. Budget authority will be required to establish coverage for non-hospital, residential-based services.

DMS will seek to establish policy standards and reimbursement for this *new level of care*. **Discovery work is expected to begin after continuing care.**

- Effective: TBD
- FH Update required
- System update
- SPA Update

Office-Based Opioid Tx (OBOT)

DHS 75 created office-based opioid treatment as a new provider type. Currently, Wisconsin OBOT prescribers may be reimbursed for medical evaluation and management services during which prescriptions/orders are issued.

Since the publication of DHS 75, the federal Consolidations Appropriations Act, 2023 removed a federal requirement for prescribers to register with the DEA as DATA-Waived to prescribe OUD medications.

Wisconsin is determining how it will move forward from these federal changes. DMS is waiting to determine whether additional work is needed. **This project is on hold.**

- TBD if this will need implementation



Questions

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