



WISCONSIN DEPARTMENT
of HEALTH SERVICES

DHS 75

State Council on Alcohol and Other Drug Abuse Update

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Bureau of Benefits Policy (BBP) | Behavioral Health Policy Section
July 2024

High-Level DHS 75 Description

The Division of Care and Treatment Services (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 substance use disorder (SUD) services, and updates requirements for existing SUD services.

High-Level DHS 75 Description

In April 2023, DMS had identified 11 Medicaid coverage projects. Since then, DMS added an additional coverage project and determined that one of the original projects is no longer needed.

DMS has completed 7 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

Completed

- Provider Certification Implementation
- Integrated Behavioral Health Stabilization 75.56
- Qualified Treatment Trainees (QTTs) *
- Act 222 *
- MH SUD Outpatient Benefit Alignment *
- Drug Testing
- Pregnancy Testing Narcotic Treatment Services (NTS) **

Not complete

- Intensive Outpatient (IOP)
Coverage expected in Q1 2025
- Concurrent Services
- Continuing Care Implementation
- Withdrawal Management Services
- Office-Based Opioid Tx (OBOT)
Coverage project no longer required

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 ForwardHealth (FH) 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 workflow is complete.

- Effective Oct 1, 2022
- FH Update 2022-33
- Interim solution for withdrawal management

QTTs

The new DHS 75 chapter allows for QTTs 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 workflow 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.

FH Update [2023-29](#) explains these services.

This workstream is complete.

- Effective July 1, 2023
- Only for outpatient SUD and SUD day treatment benefits

Pregnancy Testing NTS**

Providers identified increased DHS 75 requirements for opioid treatment programs to conduct pregnancy tests.

DMS added coverage policy of urine pregnancy testing, by visual color comparison methods (CPT code 81025) when conducted by NTS providers.

FH Update [2024-11](#) and online handbook topic [#7984](#), explains these services.

This workstream is complete.

- Effective Jan 1, 2024
- Only for narcotic treatment services

SUD IOP

DHS 75 created a new level of care that falls between outpatient services and day treatment services on the American Society of Addiction Medicine (ASAM) continuum of care.

DCTS is revising DHS 75.51 to make IOP an integrated level of care, similar to DHS 75.50. Medicaid coverage will expand to include IOP treatment for SUD and mental health conditions. Timeline was modified to accommodate the additional administrative rule project and coverage expansion.

- Effective: estimate early 2025
- Original estimate: early 2024
- Administrative rule updates
- Systems update
- SPA required
- FH update required

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 2025 or early 2026
- Original estimate: late 2023 or early 2024
- FH update required
- Systems update
- State Plan amendment 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 2026
- Original estimate: early 2024
- FH update required
- Systems update
- State Plan amendment 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.

Biennial budget request for 2023-2025 was not included in the final authorized budget.

- Effective: TBD
- FH update required
- System update
- State Plan Amendment

OBOT

1 of 2

DHS 75 created office-based opioid treatment as a new provider type. Currently, Wisconsin OBOT prescribers are 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 Drug Enforcement Administration as Drug Addiction Treatment Act (DATA)-Waived to prescribe OUD medications.

OBOT

2 of 2

DMS determined these federal changes remove the need to establish a provider type for Medicaid reimbursement since these providers are already reimbursed.

This project has been removed from the DMS list of DHS 75 projects.

- No longer needed to implement
- Providers are reimbursed in current Medicaid system structure



Questions

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