

Mondragon, Tabitha, HCA

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Sent: Friday, July 26, 2024 3:13 PM
To: HCA-madrules
Cc: Chris Collins; Brenna Gaytan; tina_m_rigler@bcbsnm.com
Subject: [EXTERNAL] Specialized Behavioral Health Services - BCBSNM Comments
Attachments: MCO Feedback for Specialized BH Services 7.26.24 (update).docx

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Good afternoon,

Thank you for giving Blue Cross and Blue Shield of New Mexico the opportunity to submit comments on amendments to New Mexico Administrative Code (NMAC) rule 8.321.2 NMAC, Specialized Behavioral Health Provider Enrollment and Reimbursement. Please, find our comments in the attached document.

Best,
Morgan Chavez

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MCO Comments for Notice of Opportunity to Comment: Specialized Behavioral Health Services

MCO	SECTION/LANGUAGE	MCO FEEDBACK ITEM/QUESTION	HCA RESPONSES
BCBS 1	8.321.2.9- C. (9) an occupational therapist licensed by the RLD board of examiners for occupational therapy; who is facilitating occupational performance and managing an individual’s mental health functioning and performance in accordance with the New Mexico occupational therapy act; or	Does this include both certified and non-certified providers. Today, provider type 451 and 452 are listed under CSA's. Will NM HSD be adding a provider type for individual OT's, who wish to be contracted independently?	
BCBS 2	8.321.2.9- L. (3)(c) the six elements of teaming may be performed by using a variety of media (with the person’s knowledge and consent) e.g., texting members to update them on an emergent event; using email communications to ask or answer questions; sharing assessments, plans and reports; conducting conference calls via telephone; using telehealth platforms conferences; and, conducting face-to-face meetings with the person present when key decisions are made. Only [the last element, that is,] conducting the final face-to-face meeting with the recipient present when key decisions are made that result in the updates to the [service] treatment plan, is a billable event.	BCBS proposes alternate language to avoid confusion: The treatment plan is only billable, when conducting the final face-to-face meeting with the recipient present and key decisions are made, resulting in an update to the treatment plan.	
BCBS 3	8.321.2.9 - O. Site visits may be conducted for specialized behavioral health services. Site visit requirements are outlined in the BH policy and billing manual. [8.321.2.9 NMAC - Rp, 8.321.2.9 NMAC, 8/10/2021; A, xx/xx/xxxx]	BCBS proposes alternate language to align with the BH Policy and Billing Manual. “Site visits must be conducted...”	
BCBS 4	[8.321.2.19] 8.321.2.20 B. (2)(c) - (xv) other certified or credentialed individuals	Clarification is requested, as to which individuals would fall under this umbrella.	
BCBS 5	[8.321.2.25] 8.321.2.26 A. (1) - IOP services are provided through an integrated interdisciplinary approach including staff expertise in both SUD and mental health treatment. This team may have services rendered by non-independently licensed and non-licensed practitioners	Will IOP approved providers be required to run both SUD and MH IOP program services?	

