Mental Health Parity Update
CMS Final Rule for Medicaid MCOs and CHIP

- The purpose of the rule is to strengthen access to mental health and substance use disorder services for Medicaid participants. In essence, the parity rule ensures that limitations on mental health and substance use disorder (MH/SUD) services are not more restrictive than limitations on medical/surgical (M/S) services.
MHD Program Changes

- Adding Coverage for Licensed Marital and Family Therapists

- Removing age restrictions for Licensed Professional Counselors and Licensed Clinical Social Workers

- Amended 13 CSR 70-98.015
  - remove documentation requirements specific to behavioral health providers – providers remain responsible for adequate documentation per 13 CSR 70-3.030(2)(A)
  - Remove 150 hour per month limit per provider
MHD Program Changes (cont.)

- Amended 13 CSR 70-98.020
  - Removed specific prior authorization language

- System work is underway to reform prior authorization policies to reduce administrative burden on providers, improve access to services

- System work is underway to change hard limits to soft limits that can be exceeded for medical necessity
Annual Compliance Reports from MCOs

- Changes to Utilization Management Protocols
- Changes to Prior Authorization Protocols
- Comparison of Denial Rates for Inpatient Behavioral Health to Inpatient Medical/Surgical
- Comparison of Appeal Overturn Rates for Inpatient Behavioral Health to Inpatient Medical/Surgical
- Changes to Benefits or Limitations