Ohio | Department of Medicaid
John R. Kasich, Governor
Barbara R. Sears, Director

Medicaid Advisory Letter (MAL) No. 624

DATE: July 1, 2018

TO: Eligible Medicaid Providers of Federally Qualified Health Centers (FQHCs) and Rural Health Clinics (RHCs)
Chief Executive Officers, Managed Care Plans
Other Interested Parties

FROM: Barbara R. Sears, Medicaid Director

SUBJECT: ***Payment of Group Therapy Services Rendered at a Federally Qualified Health Center (FQHC) or Rural Health Clinic (RHC)***

The Ohio Department of Medicaid (ODM) is providing this clarification in response to recent questions on how providers should submit claims for group therapy services (CPT codes 90847, 90849, and 90853) rendered at FQHCs and RHCs.

Group therapy services do not meet the criteria for a face-to-face encounter in an FQHC or RHC as defined in Ohio Administrative Code (OAC). Paragraph (P) of OAC rule 5160-28-01 defines a "visit" as a face-to-face encounter between a patient and a provider. Paragraph (P)(5) of OAC rule 5160-28-01 states that no service provided to anyone other than a patient may be claimed as a visit with that patient. The purpose of the face-to-face encounter is for the treating professional to document how the patient's condition, as seen during that encounter, supports the need for services.

Because group therapy services do not meet the criteria for a face-to-face encounter, FQHCs and RHCs rendering group therapy services may instead submit claims to ODM using their ambulatory health care clinic provider number (provider type 50). The fee-for-service payment amounts for group therapy services are listed in Appendix DD of rule 5160-1-60.

ODM's policy is aligned with Medicare's policy on group therapy services, which can be found in Chapter 13 of the Medicare Benefit Policy Manual posted on CMS's website at https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Internet-Only-Manuals-IOMs-Items/CMS012673.html. Section 40 reads, "An RHC or FQHC visit is a medically-necessary medical or mental health visit, or a qualified preventive health visit. The visit must be a face-to-face (one-on-one) encounter between the patient and a physician.…" Section 60.1 reads, "Non-RHC/FQHC services include, but are not limited to…Group Services – Includes group or mass information programs, health education classes, group therapy, or group education activities, including media productions and publications." Section 170 reads, "Group mental health services do not meet the criteria for a one-one-one, face-to-face encounter in an FQHC or RHC."

Additional Information

Information about the services and programs of the Ohio Department of Medicaid may be accessed through the main webpage at http://www.medicaid.ohio.gov.

Questions

Questions pertaining to this MAL may be directed to the Ohio Department of Medicaid.

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