



LOUISIANA DEPARTMENT OF EDUCATION

TO: School System Superintendents, School System Medicaid Personnel and Business Managers,
Special Education Directors, Third-party Billing Vendors

FROM: Michael Comeaux,
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Louisiana Department of Education

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Medicaid Director
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RE: School Systems and Medicaid Claiming for CPST

Date: February 12, 2019

School systems have been claiming Medicaid reimbursement for school-based counseling services provided by Certified School Psychologists and Certified School Social Workers under the Community Psychiatric Support and Treatment (CPST) code, H0036. Act 582 of the 2018 Regular Legislative Session requires all agencies that provide and claim Medicaid reimbursement for CPST services to have a Behavioral Health Services Provider License issued by the Louisiana Department of Health (LDH). School systems do not meet the requirements for this license; therefore, they are not in compliance with the Medicaid rules, policies and manuals related to reimbursement for CPST services.

LDH also completed a review of the CPST service definition and it was determined that the counseling services provided by the Certified School Psychologists and Certified School Social Workers were not in alignment with the CPST service definition and were, in fact, considered an alternative service. As a result, school systems must cease submitting claims for CPST services immediately.

For claims already submitted, Medicaid will no longer be able to make interim payments and these claims will deny effective February 6, 2019. The fee schedule is also being updated. For claims and cost settlements already paid in Fiscal Year (FY) 2017, LDH will be required to return the federal funds to the Centers for Medicare & Medicaid Services (CMS) since the services did not meet the requirements in the Louisiana Medicaid State Plan. Management has decided to not recoup the funds from the school systems in order to return the funds to CMS.

LDH is currently assessing how the FY 2018 cost settlement period will be handled. LDH will provide subsequent guidance on how the claims will be resolved.

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LDH has developed a new draft service definition that defines the school based behavioral health services provided by certified personnel in the school system for CMS approval. LDH expects to begin talks with CMS during the week of February 11, 2019. LDH intends to publish an Emergency Rule, followed by submission of a State Plan Amendment for Medicaid coverage of the service pending CMS feedback. **If CMS approves the State Plan Amendment**, the school systems will once again be able to submit claims for school-based services provided by certified personnel.

LDH and LDOE recognize the impact of these changes on the school-based behavioral health services provided by certified personnel in the school systems. LDH is diligently working to develop a definition of school based behavioral health services that is in alignment with the services that are provided by school personnel, is acceptable to CMS, and that will allow school systems to resume claiming Medicaid reimbursement for these services.

School systems may continue to claim Medicaid reimbursement for school-based behavioral health services that are provided by Licensed Clinical Social Workers, Licensed Clinical Psychologists, and Licensed Professional Counselors under the Other Licensed Professional (OLP) code. However, school systems must cease submitting claims for reimbursement under the CPST code.

Please contact Michael Comeaux at Michael.comeaux@la.gov, Andrew Perilloux at Andrew.Perilloux@la.gov, or Janice Zube at Janice.Zube@la.gov if you have any questions.

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