April 3, 2020

To: Executive Directors, Pre-paid Inpatient Health Plans  
Executive Directors, Community Mental Health Services Providers

From: Jeffery L. Wieferich, MA, LLP, Director  
Bureau of Community Based Services  
Behavioral Health and Developmental Disabilities Administration

RE: Rounding Rules for Behavioral Health Services

The Behavioral Health and Developmental Disabilities Administration (BHDDA) greatly appreciates everyone’s continued hard work in implementing the tele-practice policies during the COVID-19 mitigation. As you know it is extremely important that we use what tools are available to provide behavioral health services to the people we serve.

It has come to our attention that telephone and other telecommunication devices as the mode of connection to consumers can be a challenge given the current time duration and rounding rules. Important telecommunication appointments with the consumer may be as brief as five minutes as individuals may be uncomfortable with speaking on the phone/computer or might be hesitant to use up their pre-paid telephone minutes or limited data plans.

To accommodate reporting and billing of these brief contacts with the consumer we are implementing the following requirement: 1. The CPT rounding rules, which use the time duration mid-point, will be applied to all timed codes. Based on the CPT rounding rules, to report a 15-minute code, eight minutes of service are required. The HCPCS rules require 15 minutes of service. During the COVID-19 emergency the HCPCS rounding rules will be suspended and all timed codes will follow the CPT rounding rules. 2. All time spent on planning and documentation required for the service provided is to be included in the total direct time for the service that is reported to the state.

Please note that this reporting change only applies to specialty behavioral health services that are provided as directed within in the COVID-19 Encounter Code Chart which temporarily removed the face-to-face requirement for certain services. This reporting change will be in effect for 30 days following the termination of the Governor’s Declaration of a State of Emergency Order (2020-04, COVID-19), or on the first of the following month, whichever is later.

Please direct any questions or concerns to the provider qualifications mailbox:  
MDHHS-ProviderQualificationCode@michigan.gov

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