

VOICES FOR CHANGE

Calls to Action – Regarding MI Medicaid Telemedicine Post PHE Policy Changes

1. **Behavioral Telehealth Voices for Change:** We are asking the CMHA Behavioral Telehealth Advisory Group, CMHA members and partners to submit specific examples or situations where behavioral telehealth services are best provided or can only be provided through audio-only delivery. Please send your Voices for Change stories or public comments to be included in CMHA communications to Amy Stagg, astagg@mphi.org.
2. **Public Comment for Proposed Telemedicine Policies:** Respond directly to Laura Kilfoyle kilfoylel@michigan.gov during the 35-day public comment period. Below are the CMHA Resource Center key talking points to stress the importance of audio-only as a service delivery option.

Why? CMHA’s Behavioral Telehealth Resource Center believes Michigan Medicaid policy change to no longer reimburse services provided through audio-only will cause a lapse or inability to deliver services in situations such as:

- **Geographic regions** where broadband/connectivity issues limit client access.
- **Client technology capacity** to easily access audio & visual connection and/or navigate software.
- **Client preference** and/or comfort level with audio only services based on diagnosis and/or communication style.
- **Service Delivery Barrier:** Removing the option of audio-only service delivery creates a health disparity, leading to reduced health outcomes for affected clients.

Summary of *Proposed* Michigan Medicaid Telemedicine Policy Post Federal PHE

Permanent telemedicine policy will be effective one (1) day after the end of the Federal Public Health Emergency (PHE)

- ✓ Remaining: All policy provisions within [MSA 20-09](#)
 - Added allowable originating sites: home, local health departments, or other established site considered appropriate by provider
 - Includes distant site flexibility
 - Telemedicine payments will be at parity with in-person
- ✓ Remaining: All policy provisions with [MSA 21-24](#): Asynchronous Telemedicine Services

Sunsetting of Audio-Only Billing Codes

- Audio only ([MSA 20-13](#)) – MI Medicaid will no longer reimburse for services provided through audio-only, except for codes 99441-99443 and 98966-98968.
 - 98966-98968 – patient/guardian-initiated telephone assessment and management services (nonphysician codes)
 - 99441-99443 – patient/guardian-initiated telephone evaluation and management service (physician codes)

Additional Resources/Documents:

- ✓ [SFY 2022 Behavioral Health Code Charts and Provider Qualifications](#)
- ✓ [Bureau of Community Based Services Telemedicine Database](#)
- ✓ [Michigan Medicaid Telemedicine Policy Post Federal PHE](#)

