

ProviderAlert

To: Select Health of South Carolina Participating Rehabilitative Behavioral Health Services (RBHS) and Therapeutic Foster Care (TFC) Providers

From: Select Health Behavioral Health Utilization Management

Date: September 16, 2021

Subject: Diagnostic Assessment (DA): Date of Completion and Licensed Practitioner of the Healing Arts (LPHA) Signature

- Summary:** This provider alert includes important information regarding:
- Treatment start date for RBHS and TFC services DA signature by an LPHA requirement. Effective October 16, 2021.
 - Licensed Addictions Counselor (LAC) added to the LPHA provider list.
 - Availability of Clinical Documentation

Select Health follows the rules and regulations as outlined in the South Carolina Department of Health and Human Services (SCDHHS) RBHS Provider Manual. We require that our RBHS providers adhere to the same rules and regulations. **Please review the following excerpts and refer to the SCDHHS RBHS Provider Manual (revised version dated 4/15/21) as needed to ensure correct records are maintained for all clinical and supervisee staff, including sole proprietors.** The SCDHHS RBHS Provider Manual is located at: www.scdhhs.gov/provider-type/rehabilitative-behavioral-health-services-rbhs-manual-070119-edition-posted-070119.

Treatment Start Date for RBHS and TFC Services - LPHA Signature Requirement

In accordance with the SCDHHS RBHS Manual and SCDHHS guidance, an LPHA must certify that the member meets the medical necessity criteria for each service provided by private RBHS providers.

The following professionals are considered to be an LPHA and licensed at the independent level in South Carolina. These providers are the only providers approved to establish and/or confirm medical necessity:

- Licensed Physician
- Licensed Psychiatrist
- Licensed Psychologists

- Licensed Psycho-Educational Specialist (LPES)
- Licensed Advanced Practice Registered Nurse (APRN)
- Licensed Independent Social Worker - Clinical Practice (LISW-CP)
- Licensed Physician Assistant (PA)
- Licensed Professional Counselor (LPC)
- Licensed Marriage and Family Therapist (LMFT)
- Licensed Addictions Counselor (LAC) - (as of July 1, 2021)

A Licensed Master Social Worker (LMSW) is considered an LPHA in South Carolina and can establish and/or confirm medical necessity when employed by a State Agency. **For private Providers, a LMSW must have the DA co-signed by an independently licensed LPHA.**

Remember: Associates/interns (LPC-A, LMFT-A, social work associates etc.) cannot establish medical necessity.

Effective October 16, 2021, RBHS and TFC services cannot start until the date that the LPHA signs the DA, not the date of completion by the LMSW.

Please refer to the SCDHHS RBHS Provider Manual section on documenting medical necessity:

<https://provider.scdhhs.gov/internet/pdf/manuals/RBHS/Manual.pdf#page=116>

Reminder: Availability of Clinical Documentation

Clinical Service Notes (CSNs) and other service documentation should be completed and placed in the clinical record immediately following the delivery of a service, but no later than five business days from the date of service. Any documentation completed and placed in the clinical records for any billed activity after this deadline shall be subject to recoupment. Services must be documented in the clinical record and the documentation must justify the amount of reimbursement claimed to Medicaid. **We have confirmed with SCDHHS that this requirement not only applies to clinical service notes (CSNs), but to DAs as well.**

For questions or concerns pertaining to this communication, contact Behavioral Health Utilization Management at **1-866-341-8765**.

Thank you for your attention to these matters and for the valuable services you provide our First Choice members.