



February 4, 2020

Announcement 2094

**Attention All Behavioral Health Community Network (BHCN) Groups, Provider Type 14 Specialty 814:**

## **Responses to Questions on the Proposed Removal of Medical Supervision from the BHCN**

This web announcement addresses the questions providers have asked to the Division of Health Care Financing and Policy (DHCFP) regarding the proposed removal of Medical Supervision requirements for Behavioral Health Community Network (BHCN) enrollment and revalidation in Nevada Medicaid.

**1. Does a BHCN need to have a Medical Supervisor?**

Yes. Under current Nevada Medicaid policy, a BHCN must have a Medical Supervisor for enrollment and revalidation in Nevada Medicaid.

**2. What are the proposed changes?**

The proposed changes include a State Plan Amendment (SPA) to remove the Medical Supervision requirement from the BHCN, as well as revisions to the Medicaid Services Manual (MSM) to enhance the roles of Clinical and Direct Supervision within the BHCN.

**3. When were the proposed BHCN supervision changes introduced?**

The DHCFP's Behavioral Health Unit introduced the proposed removal of Medical Supervision from the BHCN, the proposed changes to the MSM Chapter 400, and the proposed changes to the MSM Addendum through a Public Workshop held on July 15, 2019.

**4. Are the proposed SPA changes effective currently?**

A SPA was presented at Public Hearing on September 24, 2019; this change requires approval through the Centers for Medicare & Medicaid Services (CMS). The removal of Medical Supervisor was projected to be effective January 1, 2020. The SPA is still under the review process with CMS; therefore, the removal of Medical Supervision from the BHCN enrollment is not yet effective.

**5. Are the proposed MSM changes effective currently?**

The MSM Chapter 400 and Addendum policy changes are under revision. Currently, the Chapter 400 policy remains unchanged and Medical Supervision is still required for the enrollment of a BHCN. Proposed changes will be presented to the public for comment through another Public Workshop, to be scheduled. When the proposed MSM language is finalized, Chapter 400 and Addendum changes will be presented through a Public Hearing; the date of the Public Hearing has not been announced and is dependent upon the approval of the SPA.

**6. Will stakeholders have an opportunity to review the policy changes and comment?**

Yes. Stakeholders and the public will be given the opportunity to review the policy changes and make comments during the Public Workshop (to be scheduled) and the Public Hearing (to be scheduled).

**7. When will the changes to supervision within the BHCN be effective?**

Currently there is no scheduled date for the changes to go into effect. However, it is important for BHCN providers to prepare for the removal of Medical Supervision by reviewing their current Clinical and Direct Supervision structure, ensuring that this structure is in accordance with current policy.

**8. Will there be any changes to Clinical and Direct Supervision in the BHCN or within the Behavioral Health Rehabilitative Treatment (Provider Type 82 Specialty 882) group?**

Changes and enhancements to Clinical and Direct Supervision are being considered; however, no significant changes have been adopted at this time. The Behavioral Health Unit is committed to assisting providers with any transition.

**9. How will providers know when the changes are being presented and go into effect?**

The DHCFP will inform the public of any scheduled Public Workshops through [Public Notice](#) on the DHCFP website. The public will also be informed when the Public Hearing has been scheduled to present the updated MSM policy. Information will also be provided to the public through the Nevada Medicaid website, through the Behavioral Health Training Assistance (BHTA) webinar, and through other appropriate public communications.

Please contact the Behavioral Health Unit with specific questions related to Medical Supervision, enrollment as a BHCN, Clinical and/or Direct Supervision under the BHCN and/or Behavioral Health Rehabilitative Treatment, and to be added to the Contact list for the BHTA webinar held monthly through WebEx. The email address is [BehavioralHealth@dhcfp.nv.gov](mailto:BehavioralHealth@dhcfp.nv.gov).