

# Medicaid EPSDT and Screening for Behavioral Health

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## Federal Medicaid EPSDT

- Medicaid's Early and Periodic Screening, Diagnostic, and Treatment ("EPSDT") services guarantees that all Medicaid-eligible children timely receive any medically necessary services.
- EPSDT is designed to identify health and mental health problems early before they become more serious. Its purpose is to preventively address the health needs of children to avoid increased costs later.
- Although states participating in Medicaid can elect to include certain services in their state plan for adults, for children, states must provide all categories of services in the Medicaid statute.
- The federal Center for Medicaid and Medicare Services (CMS) has designated five basic requirements for a State's EPSDT program: informing, screening, diagnosis and treatment, accountability, and timeliness.<sup>1</sup> New Mexico must ensure that all Medicaid enrolled children know about the availability of EPSDT, receive screening, get treatment based on the screens, and report utilization data to CMS.
- New Mexico should report data to CMS regarding the utilization of EPSDT services compared to eligible children.<sup>2</sup>
- EPSDT is a powerful provision of federal law that has been used by states to achieve reform of mental health service delivery systems for children.

## EPSDT Screening

- The need for services should be identified in the periodic comprehensive screening required by EPSDT. New Mexico must ensure that EPSDT screens cover all required components.
- The five components of an EPSDT screen are (1) comprehensive health and development history that accounts for physical and mental health as well as substance use disorders; (2) comprehensive unclothed physical examination; (3) Immunizations per the Advisory Committee on Immunization Practices; (4) Laboratory testing; and (5) Health education for both child and caregiver.<sup>3</sup>

## Recommendations for New Mexico

- In New Mexico, there are no specific requirements to ensure that all components of the EPSDT screen are completed, including mental health screening. There is also no state mandated standard form used for EPSDT screens that could ensure mental health of children is being evaluated.<sup>4</sup> New Mexico Human Services Department only provides anticipatory guidance.
- Identifying children in need of services can have a huge impact on the long-term success of New Mexico children. Over 20% of New Mexicans have experienced multiple adverse

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<sup>1</sup> 42 C.F.R. 441.56 (2012) - Required activities; 42 U.S.C. § 1396d(r)(1)(B); 42 U.S.C. § 1396a(a)(43)(A).

<sup>2</sup> 42 U.S.C. § 1396a(a)(43)(D)

<sup>3</sup> 42 U.S.C.A. § 1396d(r)(1).

<sup>4</sup> J PAUL TAYLOR EARLY CHILDHOOD TASK FORCE, REPORT SUBMITTED TO THE LEGISLATIVE FINANCE COMMITTEE, LEGISLATIVE HEALTH AND HUMAN SERVICES INTERIM COMMITTEE, AND THE NEW MEXICO LEGISLATURE 11 (2014); LEGISLATIVE FINANCE COMMITTEE, FISCAL IMPACT REPORT S.B. 244/aSPAC, 52nd Legislature (2015), at 4.

childhood experiences that have been shown to negatively impact adult life.<sup>5</sup> Addressing the mental health needs of children from birth to eight years of age is critical to impact the overall well-being of New Mexico citizens.<sup>6</sup> Because most children in New Mexico are on Medicaid or Medicaid eligible,<sup>7</sup> ensuring that Medicaid EPSDT screens include the required mental health screening and improving Medicaid's available mental health services for children can facilitate this impact.

#### Massachusetts: An Example of Children's Mental Health Systems Reform

- A number of states have reformed their laws and regulations to ensure that EPSDT screens are in compliance with federal law and include the necessary mental health screening of children.
- Massachusetts has reformed its EPSDT system and now covers “[d]evelopmental screening, with interpretation and report, per standardized instrument form” during EPSDT screens as a separately billed element.<sup>8</sup> A provider must bill for all components of the EPSDT screen to receive reimbursement as well as an enhanced payment for a completed screen.<sup>9</sup>
- The provider must choose from a clinically appropriate behavioral health screening tool from a list of tools provided in the appendix to all provider manuals.<sup>10</sup> Compliance with the mental health screening component is done with a standardized behavioral-health screening tool.<sup>11</sup> “The behavioral-health screening tool is a short list of questions or a checklist that the parent, guardian, or child (depending on the child’s age) fills out and then talks about with the primary-care doctor or nurse.”<sup>12</sup> There are several tools available for doctors and nurses to use, such as the Pediatric Symptom Checklist or the Parents’ Evaluation of Developmental Status.<sup>13</sup>
- If a behavioral health issue is identified during a screen, then the recipient gets a referral to a behavioral health provider for a more comprehensive diagnostic service that uses the “Child and Adolescent Needs and Strengths (CANS) tool.”<sup>14</sup> Providers should be able to complete an initial tool during a regular well-child check. The CANS tool is a more lengthy assessment to be completed after an initial screen tool identifies a need.

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<sup>5</sup> LEGISLATIVE FINANCE COMMITTEE REPORT NO. 12-10, HUMAN SERVICES DEPARTMENT: IMPROVING OUTCOMES FOR PREGNANT WOMEN AND INFANTS THROUGH MEDICAID 5 (September 27, 2012).

<sup>6</sup> J PAUL TAYLOR EARLY CHILDHOOD TASK FORCE, REPORT SUBMITTED TO THE LEGISLATIVE FINANCE COMMITTEE, LEGISLATIVE HEALTH AND HUMAN SERVICES INTERIM COMMITTEE, AND THE NEW MEXICO LEGISLATURE (2014).

<sup>7</sup> *Medicaid Enrollment Report All Children < 21 by Managed Care Organization/Fee-for-Service*, HUMAN SERVICES DEPARTMENT, (April 22, 2015, 8:54 AM), [http://www.hsd.state.nm.us/uploads/FileLinks/5bc82a76689a437682dbd68988331f79/MER\\_All\\_Children\\_under\\_21\\_by\\_Managed\\_Care\\_Organization\\_Fee\\_for\\_Service.pdf](http://www.hsd.state.nm.us/uploads/FileLinks/5bc82a76689a437682dbd68988331f79/MER_All_Children_under_21_by_Managed_Care_Organization_Fee_for_Service.pdf)

<sup>8</sup> COMMONWEALTH OF MASSACHUSETTS MASSHEALTH PROVIDER MANUAL SERIES ALL PROVIDER MANUALS, Appendix Z, available at <http://www.mass.gov/eohhs/docs/masshealth/providermanual/appx-z-all.pdf>

<sup>9</sup> MASSHEALTH, EPSDT & PPHSD EPSDT & PPHSD EARLY AND PERIODIC SCREENING, DIAGNOSIS AND TREATMENT (EPSDT) SERVICES AND PREVENTIVE PEDIATRIC HEALTHCARE SCREENING AND DIAGNOSIS (PPHSD): SERVICES BILLING GUIDELINES FOR MASSHEALTH PHYSICIANS AND MID-LEVEL PROVIDERS 2, available at <http://www.mass.gov/eohhs/docs/masshealth/provider-services/forms/epsdt-bg.txt>.

<sup>10</sup> See *id.* at 5; COMMONWEALTH OF MASSACHUSETTS MASSHEALTH PROVIDER MANUAL SERIES ALL PROVIDER MANUALS, Appendix W, available at <http://www.mass.gov/eohhs/docs/masshealth/providermanual/appx-w-all.pdf>

<sup>11</sup> See MASSHEALTH MEMBER LETTER, IMPORTANT NOTICE ABOUT YOUR MASSHEALTH BENEFITS 1, available at <http://www.rosied.org/page-91162> (under *MassHealth Member Notice*).

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

<sup>14</sup> *Id.* at 2.