

## July Chat Questions & Answers

**Q: When we tried to get the (ASAM Criteria, 4<sup>th</sup> Edition) eBook we were asked to put in a credit card, is there a fee? Should this have been asked?**

A: There is no cost to redeem the digital eBook voucher. There is a step in the registration process that requires entering a credit card. However, later in the registration process you can opt out of automatic renewals. Please reach out to the [1115demonstration.dhs@state.mn.us](mailto:1115demonstration.dhs@state.mn.us) for additional information on how to redeem ASAM 4<sup>th</sup> Edition eBook vouchers. Note, the last day for redeeming vouchers is July 31<sup>st</sup>, 2024.

**Q: Regarding the contingency management work, will that also include discussions and intersection with Anti-Kickback?**

A: The Behavioral Health Administration (BHA) is not positioned to speak about any of the anti-kickback proposals as that work is being led by DHS's Office of the Inspector General. As to how anti-kickback relates to contingency management, BHA will continue to track the proposed [safe harbor rule](#).

**Q: Has there been any information released on the peer recovery working group? Our CPRS is interested in being part of this.**

A: Not yet. Still working on initiating. Please be sure the person has subscribed to [e-memos](#) (bottom of the page) as we will likely send out info in this format.

**Q: Will the rate study also include adolescent services? Room and board for all residential? These were not included in the first review.**

A: BHA is prioritizing a study of ASAM Criteria, 4<sup>th</sup> Edition for SUD rates. BHA will continue to monitor for ASAM's release of the updated adolescent criteria and collaborate with the provider community on how to address rates for those updated services once released.

**Q: Can you reshare the info about the workforce community of practice?**

A: [Substance Use Disorder Community of Practice](#)

**Q: Regarding the midpoint discussion, would also be great to have additional FTEs at DHS to provide direct TA to providers. Lots of questions, lack of clarity leads to various interpretations of how to bill.**

A: Thank you for this comment.

**Q: I'm curious as to why NAADAC would be removed as a peer recovery certification organization?**

A: Minnesota wanted to centralize certification for recovery peers and have one location to look-up peer certification status. Since the Thursday connection session, we have connected with NAADAC representatives and hope to have more conversation and communication with them to inform possible changes.

**Q: Why remove NAADAC as a certifier?**

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**Q: Are there other open meetings/resources to follow updates with the 1115 Re-Entry waiver?**

A: BHA is currently working on a communication plan and will continue to bring updates on the project to the Thursday Connections Meeting.

**Q: When will the SPA go to CMS and come back with the residential requirements on 30 hours and skilled services every day?**

A: [The draft SPA's 30-day public comment window ended on July 13, 2024](#). Centers for Medicare and Medicaid Services (CMS) has 90 days to respond to the state. They don't always take the full 90 days to respond.

**Q: Co-occurring modifier updates? One MH professional for program license # or one MH professional available being used at multiple or utilization of MH Clinic professionals to support program licenses, need MH group on program schedules etc.? question was asked last month for more clear guidelines with the removal of percentages from statute and FAQ not yet posted**

A: There are multiple requirements related to mental health professionals (MHPs) which apply to SUD treatment programs:

- 245G.08, subd. 4: All SUD treatment programs must have access to and document the availability of a licensed mental health professional to provide diagnostic assessment and treatment planning assistance. The MHP in this case may or may not be a SUD treatment program staff member, depending on whether or not they meet the definition in 245G.01, subd. 20e.
- 245G.20: SUD treatment programs specializing in the treatment of a person with co-occurring disorders must have a mental health professional available for staff member supervision and consultation. The MHP in this case may or may not be a SUD treatment program staff member, depending on whether or not they meet the definition in 245G.01, subd. 20e.
- 254B.05, subd. 5, (c), (5): SUD treatment programs approved for the enhanced rate for services to individuals with co-occurring must meet the currently published staffing ratios for counseling staff. Effective August 1, 2024, the requirement is that the program employs a mental health professional as defined in section 245I.04, subdivision 2. The MHP in this case must be a SUD treatment program staff member.

Please feel free to reach out to [Behavioral Health](#) or [Licensing](#) for more specific questions.

**Q: Do we have an update on the side by side?**

A: It is currently posted. Please see the [Direct Access webpage](#) under Legislative section.