

Integrated managed care guidance on Medicaid reimbursable peer services 07/20/2021

Background

HCA has been asked to provide clarity regarding peer services, peer credentialing and the licensing/certification required for Medicaid reimbursement.

Q: What is the definition of a peer?

A: See definitions in the following references:

- [Washington State Plan, Title XIX Medicaid Plan, section 13d Rehabilitative Services:](#)

A mental health Peer Counselor means an individual who: “has self-identified as a consumer or survivor of mental health services; has received specialized training provided/contracted by the Mental Health Division; has passed a written/oral test, which includes both written and oral components of the training; has passed a Washington State background check; has been certified by the Mental Health Division (currently Division of Behavioral Health and Recovery); and is registered as a counselor (currently Agency Affiliated) with the Department of Health.” MH Peer Counselors must be supervised by an MHP.

A substance use disorder Peer Counselor means an individual who “has self-identified as in recovery from substance use disorders; has received specialized training provided or contracted by the Division of Behavioral Health and Recovery (DBHR); has passed a test, which includes both written and oral components of the training; has passed a Washington State background check; obtains and maintains a counselor credential with DOH: and has been certified by DBHR. SUD Peer Counselors must be supervised by a CDP.”

- [WAC 182-538D-0200- Behavioral health services—Definitions.](#)
- [WAC 246-341-0724- Outpatient services—Recovery support—Peer support mental health services.](#)

Q: When is a certified peer counselor fully credentialed for Medicaid reimbursable services?

A: A Peer Counselor must be certified through Division of Behavioral Health and Recovery (DBHR) and maintain an Agency Affiliated Counselor (AAC) credential with Department of Health (DOH). In accordance with Washington Medicaid State Plan, peer services must be provided by a DOH licensed Behavioral Health Agency (BHA) in order to be paid by Medicaid. Agency Affiliated Counselor (AAC) credential by definition means that the professional is employed by a BHA.

Q: Who can provide clinical supervision to Certified Peer Counselors?

A: In accordance with the State Plan, MH peer counselors must receive clinical supervision by an MHP and SUD peer counselors must receive clinical supervision from a SUDP. However, best practice would be for peers to also report to another supervising peer professional. This peer-to-peer reporting structure supports the peer role while not replacing the clinical supervision provided by the MHP or SUDP.



Q: When can an agency bill for Medicaid reimbursable peer services?

A: For an agency to bill for Medicaid reimbursable peer services they need to be a licensed community behavioral health agency and have the certification to provide peer services added to their license. Peer services need to be provided by a Certified Peer Counselor who has completed the specialized training, passed the state test, received written certification from DBHR, passed a background check, and is credentialed as an agency affiliated counselor through the Department of Health.

Additional information regarding background checks. In accordance with [RCW 18.19.095](#) Agency affiliated counselor practicing as peer counselor—No automatic denial of applicant with past conviction for certain offenses—Conditions.

“The department may not automatically deny an applicant for registration under this chapter for a position as an agency affiliated counselor practicing as a peer counselor in an agency or facility based on a conviction history consisting of convictions for simple assault, assault in the fourth degree, prostitution, theft in the third degree, theft in the second degree, or forgery, the same offenses as they may be renamed, or substantially equivalent offenses committed in other states or jurisdictions if:

- (1) At least one year has passed between the applicant's most recent conviction for an offense set forth in this section and the date of application for employment;
- (2) The offense was committed as a result of the person's substance use or untreated mental health symptoms; and
- (3) The applicant is at least one year in recovery from a substance use disorder, whether through abstinence or stability on medication-assisted therapy, or in recovery from mental health challenges”.

Q: Can a DBHR certified Peer Counselor provide services while their Agency Affiliated Counselor (AAC) credential with DOH is still being processed?

A: Yes, per the Department of Health (DOH) there is a grace period while the person is waiting for the AAC credential to process.

[Read more on the DOH website](#)

Excerpts from the DOH website, AAC FAQ:

May I provide counseling while my agency affiliated counselor credential is being processed?

Yes. Per [WAC 246-810-015](#) if you apply for this credential within 30 days of employment, you may provide counseling while your application is processed. The department will review the application and if further information is required it will issue a letter listing the deficiencies. The applicant will have 90 days from the date of the deficiency letter to provide all necessary documentation. If the required documentation is not received by the department within 90 days, the applicant must stop working until the credential is issued.

May I provide unsupervised counseling?

No, you may not provide unsupervised counseling until the completion of a criminal background check by either your employer or the department.

What is unsupervised counseling?

Unsupervised counseling means the supervisor is not physically present at the location where the counseling occurs.



How do changes to the Uniform Disciplinary Act affect peer counselors working as agency affiliated counselors?

- RCW 18.130.175 and RCW 43.43.842 were modified to reduce barriers to licensure for peer counselors working as agency-affiliated counselors. These changes apply only to applicants for the agency-affiliated counselor registration who are also certified peer counselors with the Health Care Authority.
- Applicants with one year in recovery from a substance use disorder are not required to enter a monitoring program. Applicants with less than one year will be required to be in a monitoring program only until they achieve one year in recovery.
- Applicants convicted of a crime identified in RCW 18.19 cannot be automatically denied if:
 - One year has passed since the conviction;
 - The offense was committed as a result of their substance use or untreated mental health symptom; and
 - They are at least one in year in recovery from their substance use disorder or in recovery for mental health challenges.

Q: What is allowed per Service Encounter Reporting Instructions (SERI) guide for the peer provider type?

[Read the SERI guide](#)

A: In SERI, the peer provider type is denoted as “DBHR Credentialed Certified Peer Counselor”, taxonomy 175T00000X.

*When submitting encounters please refer to SERI and ensure to include applicable modifier(s)

View the SERI code tables on page 4.

SERI code table Code & SERI Page #	Modality: Service in SERI	Mental Health (MH) and/or Substance Use (SUD)	Funding Source
H2012 pg.23	Day Support: Behavioral Health Day Treatment	MH	Medicaid allowable/State Funded
H2014 H2015 H0046 Pg. 38 & 39	Individual Treatment Services: Skills training and development; Comprehensive community support services; mental health services NOS	MH	Medicaid allowable/State Funded
H0033 H0034 Pg. 53 &54	Medication Monitoring: Oral medication administration. direct observation; Medication Training and Support,	MH	Medicaid allowable/State Funded
H0038 Pg. 58 & 106	Peer Support: Self-help/peer services	MH and SUD	Medicaid allowable/State Funded
H0023 Pg. 66	Rehabilitation Case Management (RCM) & Engagement and Outreach Services: Behavioral Health Outreach Services	For RCM MH only; Engagement and Outreach MH and SUD	RCM: Medicaid allowable Engagement & Outreach: State Funded
H0025 H2027 S9946 Pg. 71	Therapeutic Psychoeducation: Behavioral health prevention education services; Psycho-education service, patient education, not otherwise classified, by non-physician provider, in group setting, per session	MH	Medicaid allowable/State Funded
H2021 Pg. 73	Care Coordination: Community based wrap-around services	MH	State Funded



Q: What can a certified peer counselor do while waiting for their Agency Affiliated Counselor (AAC) credential to process?

A: A certified peer counselor may provide services as outlined above under the appropriate supervision.

Q: What is allowable to bill for the peer provider type per Medicaid billing rules?

A: State Plan and Medicaid billing requirements require providers to have a DOH credential. Thus, should the MCO allow billing of services while the AAC is being processed and the AAC is not granted for any reason, then **ALL** of the Medicaid claims are unallowable and will need to be pulled back.

Additional Information:

- To align with the State Plan, taxonomy provider type - 175T99994L - Non-DBHR Certified Peer Counselor was removed in the recent with SERI version released March 2021 with implementation date of July 1, 2021. This deletion affected code H0038.

Resources for Peers

[Peer training information](#)

Application Information: Applicants are required to complete the CPC online pre-requisite training and submit the certification of completion to peersupportapps@hca.wa.gov as part of the application process. [View the online application link and information for the online pre-requisite training.](#)

Applicants are invited to the Certified Peer Counselor trainings based on employment needs:

- #1 Applicants who are currently working as a peer counselor or who have a confirmed job offer as a peer counselor at a Medicaid funded facility are given highest priority for training.
- #2 Working as a peer counselor in any other agency.
- #3 Veteran or working/volunteering at any behavioral health related facility.
- #4 Working and/or shows higher than usual knowledge of recovery.
- #5 Not working or volunteering, qualifies due to eligibility.

The Standard CPC Training, Youth and Family CPC Training, and the Bridge training result in the same certification.

[Continuing Education Curriculum](#)

Additional Guidance Documents:

- [Peer support reimbursement](#)
- [Peer services fact sheet](#)

Additional References:

- [SPA](#)
- [Current SEIR effective July 1, 2021](#)