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Memorandum

To: OMH-Licensed Article 31 Mental Health Clinics

From: Robert Myers, PhD
Senior Deputy Commissioner
Community Program Management and Managed Care, OMH

Date: December 2, 2020

RE: COVID-19-related Integrated Clinic Treatment

The Office of Mental Health encourages integrated care to ensure the treatment of the whole person, including treatment of medical co-morbidities, and as an effort to prevent siloed care. This is particularly important during the COVID-19 Disaster Emergency where increased in-person visits present added infection risk. To assist OMH-licensed Clinic Treatment Programs with providing optimal care during the COVID-19 Disaster Emergency, we offer the following guidance:

Clinic Treatment Services:

- Psychiatric Assessment services may include managing chronic illness medications and related counseling, including COVID prevention. Provided that each service addresses the individual's mental health issues, it is within the definition of psychiatric assessment to also treat co-morbid medical illnesses, particularly if associated with, caused by or contributing to mental health issues, such as metabolic syndrome, tobacco use disorder, neurological issues, etc. Psychiatric Assessment includes, but is not limited to, diagnosis, prescription of medications, education, and motivational interviewing aimed to promote healthy living. The Psychiatric Assessment service must also address the recipient's mental health condition. That is, it cannot be used in lieu of the health monitoring service or for treatment of individuals without any mental health issues. A mental status exam and psychiatric history of present illness must be included in the documentation. Documentation should reflect this integrated approach.
- Individual, Family/Collateral and Group Psychotherapy services may include chronic illness support and education including COVID prevention education. Psychotherapy services may be used when the therapist addresses anxiety or other emotional distress caused by the COVID-19 pandemic and associated socioeconomic disruptions. The services necessarily include educational interventions and may also be used when the therapist explores with the patient underlying resistance to taking basic preventive measures, such as following mask-wearing rules or respecting physical distancing.

This is particularly appropriate if the recipient's mental health condition contributes to increased infection risk. Documentation should reflect a holistic approach to the whole person and always include consideration of the underlying mental health condition and should reflect core aspects of Psychotherapy as defined by Part 599 clinic regulations:

Psychotherapy means therapeutic communication and interaction for the purpose of alleviating symptoms or dysfunction associated with an individual's diagnosed mental illness or emotional disturbance, reversing or changing maladaptive patterns of behavior, encouraging personal growth and development, and supporting the individual's capacity to achieve age-appropriate developmental milestones.

- It is strongly recommended that the above treatment services be conducted in coordination with Health Monitoring Services.

Staffing:

Psychiatric Assessment, Individual, Family/Collateral and Group Psychotherapy services must be provided by Clinic Treatment Program staff consistent with Part 599 clinic regulations and scope of practice.

Policies and Procedures:

To ensure quality of care and appropriate staff expertise in providing such integrated services, each agency must develop policies and procedures to capture local standards for:

- Adequate chronic illness training appropriate to the service and service provider.
- Available consultation with a primary care physician (PCP) or family nurse practitioner for prescribers and a PCP/NP/psychiatrist for therapists. Such supervision may be remote, and group supervision with staff performing such integrated services is recommended.

Billing:

Integrated Psychiatric Assessment, Individual, Family/Collateral and Group Psychotherapy services provided according to the above parameters meet standard service definitions. Therefore, billing for these services should be performed according to standard APG methodology using standard CPT codes, rate codes, E/M codes and modifiers.

If there any questions, please contact omh.sm.Adult-Clinic@omh.ny.gov.