

## Medicaid Coordination of Benefits for Medicare Opioid Treatment Provider (OTP) Coverage

Effective January 1, 2020, Medicare now covers opioid treatment programs. According to the [OTP enrollment website](#), a number of agencies are now enrolled in Medicare as an opioid treatment program. This communication is being sent to all Medicaid-enrolled OTPs in the event some are in the process of enrolling in Medicare as an OTP.

As required by the Centers for Medicare and Medicaid Services (CMS), ODM has developed an approach to coordinate Medicaid payment for OTP services with Medicare's OTP benefit, to ensure services and costs covered by Medicare are not paid by Medicaid or Medicaid managed care plans. We have identified those OTP services covered by Medicaid that are included in the Medicare bundled payment, as well as those that are not part of the Medicare bundled payment, as shown in Table 1.

Currently, many of these procedure codes are included in ODM's Medicare bypass list and allowed to be paid by Medicaid as they had not been covered by Medicare prior to January 1, 2020.

**Effective November 1, 2020, all MyCare Ohio plans will remove the procedure codes that are part of the Medicare OTP bundle from this bypass list.** This means that any future Medicaid claims for dually eligible recipients will need to show proof of Medicare denial and valid reason for non-payment prior to Medicaid making any payment for the OTP services that are included in the Medicare bundled payment.

For fee-for-service claims, MITS will not have the changes made November 1, 2020. Until these system changes can be operationalized, ODM will work with its third-party collection vendor to pursue repayment for any services that should have been billed to Medicare. For OTP claims submitted to MyCare Ohio plans prior to November 1, 2020, MyCare Ohio plans will also pursue repayment for services that should have been billed to Medicare as primary once the agency was enrolled in Medicare.

**Table 1: Medicaid Procedure Codes Covered / Not Covered under Medicare Bundled Payment**

	ASAM Level 1	ASAM Level 2	ASAM Level 3
Ohio Medicaid codes covered by Medicare	H0020/T1502 - med admin  90791-92, H0001 – assessment 99201-05, 99211-15, 99341-50 H0004 - individual counseling H0005 - group counseling H0048 - urine drug screen 90832-38 – indiv counseling 90853 – group counseling 96372 – injection admin	H0020/T1502 90791-92, H0001 99201-05, 99211-15 99341-50 H0004 H0005 H0048 90832-38 90853 96372	H0020/T1502
Ohio Medicaid medication codes covered by Medicare	S5000-01, J0571-75, J2310, J8499		
Ohio Medicaid lab drug testing codes covered by Medicare	80305-07, 80320-36, 80338-77, 83992, G0480-83		
Ohio Medicaid codes <b>NOT</b> covered by Medicare	H0006 - care management H0038 - peer recovery T1002 - RN services T1003 - LPN services	H0015 - IOP H0015 TG - PH H0012 - detox H0014 - detox  H0006 H0038 T1002 T1003	H2034 - residential H2036 - residential H0010 - detox H0011 - detox