



STATE OF MICHIGAN

DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

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DIRECTOR

March 3, 2021

TO: Executive Directors of Prepaid Inpatient Health Plans (PIHPs) and
Community Mental Health Services Programs (CMHSPs)

FROM Jeffery L. Wieferich, M.A., LLP *JW*
Director
Bureau of Community Based Services

SUBJECT: Expectation of the Provision of Face-to-Face Services

The Behavioral Health and Developmental Disabilities Administration has received numerous complaints from beneficiaries, families, and other state agencies about CMHSPs denying or not offering face-to-face services and supports. Despite having a very strong telemedicine framework, it does not mean that face-to-face services can be summarily suspended. In accordance with the July 8, 2020, Essential Behavioral Health Services in the COVID-19 Context: Updated Guidance Communication document #20-11 “The clinical rationale for the modality used, including face-to-face, or the use of telephonic or virtual services shall be made with input from individual(s) served and must be documented on an individualized basis. Such rationale shall be reviewed and updated regularly as the individual’s needs and the public health crisis evolves.”

This communication can be found at the below link:

https://www.michigan.gov/documents/mdhhs/BH_Communication_Essential_Virtual_and_F2F_Services_COVID-19_Guidance_20-11_695961_7.pdf

Face to face services must be provided unless they cannot be provided safely, or if the family specifically requests telehealth services; either instance should be well documented. Individuals can refuse face-to-face services and that should also be documented. If the CMHSP denies face to face service provision when requested strong documentation would be needed.

The Person Centered or Family Driven Youth Guided Individual Plan of Service should reflect a clinical determination of how services will be provided for each individual. CMHSPs must not tell beneficiaries that they can only receive home and community-based services through telemedicine, this type of decision must be done on an individual level as part of the planning process. Individuals and families must be presented with choices about the way in which services can be provided.

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