

**PARTNERSHIP HEALTHPLAN OF CALIFORNIA  
POLICY / PROCEDURE**

<b>Policy/Procedure Number:</b> MCUP3145		<b>Lead Department:</b> Health Services	
<b>Policy/Procedure Title:</b> Eating Disorder Management Policy		<input checked="" type="checkbox"/> <b>External Policy</b> <input type="checkbox"/> <b>Internal Policy</b>	
<b>Original Date:</b> 08/10/2022		<b>Next Review Date:</b> 09/13/2024 <b>Last Review Date:</b> 09/13/2023	
<b>Applies to:</b>	<input checked="" type="checkbox"/> <b>Medi-Cal</b>	<input type="checkbox"/> <b>Employees</b>	
<b>Reviewing Entities:</b>	<input checked="" type="checkbox"/> <b>IQI</b>	<input type="checkbox"/> <b>P &amp; T</b>	<input checked="" type="checkbox"/> <b>QUAC</b>
	<input type="checkbox"/> <b>OPERATIONS</b>	<input type="checkbox"/> <b>EXECUTIVE</b>	<input type="checkbox"/> <b>COMPLIANCE</b> <input type="checkbox"/> <b>DEPARTMENT</b>
<b>Approving Entities:</b>	<input type="checkbox"/> <b>BOARD</b>	<input type="checkbox"/> <b>COMPLIANCE</b>	<input type="checkbox"/> <b>FINANCE</b> <input checked="" type="checkbox"/> <b>PAC</b>
	<input type="checkbox"/> <b>CEO</b> <input type="checkbox"/> <b>COO</b>	<input type="checkbox"/> <b>CREDENTIALING</b>	<input type="checkbox"/> <b>DEPT. DIRECTOR/OFFICER</b>
<b>Approval Signature:</b> Robert Moore, MD, MPH, MBA		<b>Approval Date:</b> 09/13/2023	

**I. RELATED POLICIES:**

- A. MCUP3028 - Mental Health Services
- B. MCUG3024 - Inpatient Utilization Management
- C. MCUP3014 - Emergency Services
- D. MCUP3052 - Medical Nutrition Services
- E. MPCD2013 - Care Coordination Program Description
- F. MCCP2022 - Early & Periodic Screening, Diagnostic and Treatment (EPSDT) Services
- G. ADM52 - Dispute Resolution Between PHC and MHPs in Delivery of Mental Health Services

**II. IMPACTED DEPTS:**

- A. Health Services
- B. Provider Relations
- C. Administration - Behavioral Health
- D. Claims
- E. Member Services

**III. DEFINITIONS:**

- A. Eating Disorder: Per the Diagnostic and Statistical Manual of Mental Disorders (DSM) Fifth Edition, feeding and eating disorders are characterized by a persistent disturbance of eating or eating-related behavior that results in the altered consumption or absorption of food and that significantly impairs physical health or psychosocial functioning.
- B. Non-Specialty Mental Health Services (NSMHS): aka Mild to Moderate Mental Health Services Managed Care Plans (MCPs) are responsible for providing or arranging for medically necessary NSMHS provided to members which include (*per Reference VII.D*):
  1. Individual and group mental health evaluation and treatment, including psychotherapy, family therapy, and dyadic services
  2. Psychological testing, when clinically indicated to evaluate a mental health condition
  3. Outpatient services for the purposes of monitoring drug therapy
  4. Psychiatric consultation
  5. Outpatient laboratory, medications<sup>1</sup>, supplies, and supplements

<sup>1</sup> As per [APL 22-012 Revised](#), this does not include medications covered under the Medi-Cal Rx Contract Drugs List, which can be accessed at: <https://medi-calrx.dhcs.ca.gov/home/cdl/>.

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- C. Specialty Mental Health Services (SMHS): aka Serious and Persistent Mental Health Services Mental Health Plans (MHPs) are required to provide and cover all medically necessary SMHS in accordance with their contracts with the California Department of Health Care Services (DHCS).
- D. (MCP) Managed Care Plan: Partnership HealthPlan of California (PHC) is contracted as a DHCS Managed Care Plan (MCP). MCPs are required to provide and cover all medically necessary physical health and non-specialty mental health services.
- E. (MHP) Mental Health Plan: A county Mental Health Plan in PHC’s service area. MHPs are required to provide and cover all medically necessary SMHS in accordance with their contracts with DHCS.
- F. Eating Disorder Treatment Levels of Care:
1. **Outpatient:** Patient lives at home and attends weekly (usually 1:1) sessions with their provider. Patient is determined to not need daily medical monitoring and patient is psychiatrically stable enough to live at home and engage in prescribed treatment programming. Eating disorder symptoms are under sufficient control such that individual can function normally in social, educational, or vocational situations and continue to make progress in treatment.
  2. **Intensive Outpatient:** Patient lives at home and attends treatment program at a specialized setting (virtually, hospital based, or eating disorder treatment center). Treatment typically involves programming that occurs 2 to 3 times per week for at least three (3) hours each time, and groups in addition to 1:1 treatment may be part of the program. The patient is medically and psychiatrically stable enough to live at home, and they will often maintain work and/or school obligations while engaging in treatment.
  3. **Partial Hospital:** Patient lives at home and attends treatment program at a specialized setting (virtually, hospital based, or eating disorder treatment center). Treatment typically involves programming that occurs five (5) days per week for 6-8 hours per day and can consist of a range of services such as 1:1 therapy, group-based therapy, family therapy, nutrition counseling, along with supportive meals. Patient remains medically and psychiatrically stable enough to live at home, but requires highly structured, intensive, eating disorder treatment to reduce eating disorder symptoms and achieve progress towards recovery.
  4. **Residential:** Patient lives at a specialized eating disorder program because they require 24-hour care/supervision in order to control and reduce active eating disorder behaviors. Patient is medically stable. Treatment typically involves programming that occurs daily for 6-8 hours per day and can consist of a range of services such as 1:1 therapy, group-based therapy, family therapy, nutrition counseling, along with supportive meals, and co-occurring psychiatric care. All meals and snacks are supervised and provided in a supportive environment. Depending on the program, more complex medical needs such as nasogastric tube feeding may or may not be available.
  5. **Inpatient Eating Disorder Program:** Patient lives at specialized eating disorder program because they require 24-hour care/supervision in order to control and reduce active eating disorder behaviors, and lower levels of care have often proven to provide insufficient structure and monitoring to improve eating disorder symptoms. Oftentimes, the patient requires additional medical or psychiatric oversight for complex issues or needs that are not able to be handled in Residential level of care (e.g., nasogastric tube feeding, significant mood or psychiatric instability that requires active daily management). Focus is on weight restoration.
  6. **Inpatient Acute Care Medical Hospital:** Patient is medically unstable (i.e., unstable or depressed vital signs, laboratory findings indicative of acute physiologic risk, complications from coexisting medical conditions such as diabetes) and often also psychiatrically unstable (i.e., suicidality, rapidly worsening mood or other psychiatric symptoms). Focus is on weight restoration and stabilization of acute medical abnormalities.
  7. **Inpatient Acute Care Psychiatric Hospital:** In most instances, patient is not acutely medically unstable (see Inpatient Acute Care Medical Hospital above), but has active psychiatric symptoms that require specialty inpatient psychiatric care (e.g., significant mood symptoms,

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suicidality/homicidality, psychosis). Most units will not be equipped to manage lines/tubes. Focus is on achieving stabilization of acute psychiatric symptoms, not necessarily eating disorder treatment.

**IV. ATTACHMENTS:**

A. N/A

**V. PURPOSE:**

To delineate how appropriate and effective services and treatments for PHC members with eating disorders are coordinated between PHC, which provides medically necessary physical health and non-specialty mental health services, and the county Mental Health Plans in PHC’s service area, which provide all medically necessary specialty mental health services.

**VI. POLICY / PROCEDURE:**

A. Coordinating appropriate and effective services and treatment for members with eating disorders is a shared responsibility between Partnership HealthPlan (PHC) and each county Mental Health Plan (MHP) in PHC’s service area. When evaluating requests for members under age 21, both PHC and MHPs will consider EPSDT criteria, including assessment of whether the service is necessary to correct or ameliorate the condition, whether or not the service is generally only available to members over age 21 (see policy MCCP2022 *Early & Periodic Screening, Diagnostic and Treatment (EPSDT) Services*).

1. As a Managed Care Plan, PHC is responsible for all medically necessary physical health components of eating disorder treatment and providing or arranging medically necessary non-specialty mental health services (NSMHS) (see III.B above) for our members.
  - a. PHC provides inpatient hospitalization for members with physical health conditions, including those who require hospitalization due to physical complications of an eating disorder and who do not meet criteria for psychiatric hospitalization. PHC also provides or arranges for NSMHS for members requiring these services.
  - b. PHC covers and pays for emergency room professional services as described in Section 53855 of Title 22 of the California Code of Regulations. Emergency services include professional services and facility charges claimed by emergency departments including, but not limited to the following: professional physical, mental, and substance use treatment services, including screening examinations necessary to determine the presence or absence of an emergency medical condition and, if an emergency medical condition exists, for all services that are medically necessary to stabilize the member.
  - c. If a member requires partial hospitalization and a residential eating disorder program, PHC is responsible for the medically necessary physical health components of the treatment, including locating, arranging, and following up to ensure services were rendered. (The MHP is responsible for the medically necessary Specialty Mental Health Services (SMHS) components.)
  - d. PHC provides case management to coordinate and ensure the provision of all medically necessary services, including out of network services if necessary.
  - e. Registered Dietitians (RDs) may bill PHC for CPT codes 98970 thru 98972 for monitoring meal plan journals virtually between sessions when treating a member who has been diagnosed with an eating disorder. No TAR is required when the member has an eating disorder diagnosis code on record.
2. MHPs are responsible to provide and cover all medically necessary Specialty Mental Health Services (SMHS), aka *Serious and Persistent Mental Health Services*, in accordance with their contracts with the Department of Health Care Services (DHCS).

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- a. If a member requires partial hospitalization and a residential eating disorder programs, the MHP is responsible for the medically necessary SMHS components. (PHC is responsible for the medically necessary physical health components of the treatment.)
  - 1) PHC and each county MHP will update their Behavioral Health Memorandum of Agreement (MOU)<sup>2</sup> to mutually agree upon an arrangement to cover the cost of medically necessary services provided in partial hospitalization and residential eating disorder programs. This includes coming to an agreement on the bundle of services, unit costs, and total costs associated with an episode or case of eating disorder treatment.
3. PHC and each county MHP will update their Behavioral Health Memorandum of Agreement (MOU) to document the following:
  - a. The division of financial responsibility.
  - b. A plan in the event that PHC and the MHP cannot agree on how to divide financial responsibility. (*see policy ADM52 Dispute Resolution Between PHC and MHPs in Delivery of Mental Health Services*)
  - c. Details about which plan will be responsible for establishing contracts detailing payment mechanisms with providers.
  - d. A requirement that any medically necessary service requiring shared responsibility (such as partial hospitalization and residential treatment for eating disorders) requires coordinated case management and concurrent review by both PHC and the MHP.
  - e. Specification of procedures to ensure timely and complete exchange of information by both the MHP and PHC for the purposes of medical and behavioral health care coordination to ensure the member's medical record is complete and PHC can meet its care coordination obligations.
4. PHC will not delay the case management and care coordination, as well as the coverage of, medically necessary services pending the resolution of a dispute. (*see policy ADM52 Dispute Resolution Between PHC and MHPs in Delivery of Mental Health Services*)

## VII. REFERENCES:

- A. Department of Health Care Services (DHCS) All Plan Letter [\(APL\) 22-003](#) Medi-Cal Managed Care Health Plan Responsibility to Provide Services to Members with Eating Disorders (03/17/2022)
- B. DHCS [APL 21-013](#) Dispute Resolution Process Between Mental Health Plans and Medi-Cal Managed Care Health Plans (10/04/2021)
- C. DHCS APL 22-012 [Revised Governor's Executive Order N-01-19 Regarding Transitioning Medi-Cal Pharmacy Benefits From Managed Care to Medi-Cal Rx](#) (12/30/2022)
- D. Welfare and Institutions Code ([WIC](#)) [Section 14184.402](#) (b)-(d), (f), (i)(1)
- E. Title 22 of the California Code of Regulations (CCR) [Section 53855](#)
- F. County specific Behavioral Health Memoranda of Understanding (MOUs)<sup>2</sup>
- G. Practice Guideline for the Treatment of Patients with Eating Disorders: Third Edition. [https://psychiatryonline.org/pb/assets/raw/sitewide/practice\\_guidelines/guidelines/eatingdisorders.pdf](https://psychiatryonline.org/pb/assets/raw/sitewide/practice_guidelines/guidelines/eatingdisorders.pdf)
- H. Alliance for Eating Disorders: Types of Eating Disorder Treatment. <https://www.allianceforeatingdisorders.com/types-of-eating-disorder-treatment-levels-of-care/>

## VIII. DISTRIBUTION:

- A. PHC Department Directors
- B. PHC Provider Manual

<sup>2</sup> Pursuant to revised DHCS template for Behavioral Health MOUs executed with each county Mental Health Plan. Template revisions were delayed and are expected to be released by DHCS in late summer 2023 for review and execution.

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**IX. POSITION RESPONSIBLE FOR IMPLEMENTING PROCEDURE:** Senior Director, Health Services;  
Behavioral Health Clinical Director

**X. REVISION DATES:** 09/13/23

**PREVIOUSLY APPLIED TO:** N/A