

DECEMBER 17, 2019



Welcome and Opening Remarks

Agenda

- Overview of IBHS Regulations
- > IBHS Timeline
- ➤ OMHSAS Updates
- > Review written order/assessment/treatment plan requirements
- > Staff qualifications, training and supervision changes
- ➤ Magellan updates
- Review proposed Magellan authorization process
- Extended Assessment (Delaware and Montgomery Counties only)
- > ISPTM plan
- > Transition plan for BHRS to IBHS authorizations
- > AUD's
- Questions
- Next steps



What is IBHS?



- Intensive Behavioral Health Services were created when a diverse stakeholder group came together to talk about regulating BHRS.
 Stakeholders included family members, providers, and other parties involved in making BHRS work.
- In these discussions the stakeholder group determined a new name (IBHS) would be best to move the services forward.

IBHS has 3 main categories:



Individual

- Behavior Consultation (BC)
- Mobile Therapy (MT)
- Behavior Technician (BT)

Evidence Based Therapy (FFT & MST)

Group

- Therapeutic Afterschool Program (TASP)
- Summer Therapeutic Activities Program (STAP)
- ABA group services

ABA

- Behavior Analytic
- Behavior Consultation ABA
 - Assistant BC -ABA
 - BHT-ABA

• Providers will write in their Program Descriptions which of these categories their agency plans to deliver.



Individual Services



Intensive therapeutic interventions and supports that:

- > reduce and manage identified therapeutic needs
- increase coping strategies
- > support skill development to promote positive behaviors
- > and stabilize, maintain or maximize functioning of a child, youth or young adult
- > provided in the home, school or other community setting.



Group Services



Group services are therapeutic interventions provided primarily in a group format through clinical interventions including psychotherapy and ABA services, structured activities and community integration activities that address a child's, youth's or young adult's identified treatment needs. Group services may be provided in a school, community setting or community like setting. A community like setting is a setting that simulates a natural or normal setting for a child, youth or young adult.

 Delivered by graduate-level professional or individual qualified to provide BHT or BHT-ABA services



ABA Services



ABA is the design, implementation and evaluation of environmental modifications, using behavioral stimuli and consequences, to produce socially significant improvement in human behavior or to prevent loss of attained skill or function, including the use of direct observation, measurement and functional analysis of the relations between the environment and behavior.

ABA is used to develop needed skills (behavioral, social, communicative, and adaptive functioning) through the use of reinforcement, prompting, task analysis, or other appropriate interventions in order for a child, youth or young adult to master each step necessary to achieve a targeted behavior.



Intensive Behavioral Health Services Regulations



- IBHS regulations will replace all current MA Bulletins for BHRS
- Applies to BHRS, ABA, Evidence Based Programs (Multi-Systemic Treatment (MST), Functional Family Therapy (FFT) etc.), CRR Host Home and group activities (Summer Therapeutic Activities Program (STAP), Therapeutic After School Program (TASP))
- Changes to the evaluation/recommendation process
- ABA available to non-ASD children
- Elimination of the Interagency Services Planning Team Meeting (ISPTM) requirement
- Enhances minimum staffing and training requirements
- Adjusts licensing requirements



Intensive Behavioral Health Services Regulations (cont.)



- Imposes new clinical leadership structure
- Enhances supervision requirements for all staff
- Requires annual outcomes reports for all providers
- Addresses restrictive procedures
- *BH-MCO's have the right to enforce additional requirements
- Magellan will be developing Performance Standards for IBHS that will be shared with providers and stakeholders
- Magellan QI will provide oversight for the implementation which will include a request for the QM Plan to be sent to Magellan for review. Magellan understands these plans to be living and active documents to drive providers' process and maintain a continuous quality improvement.



IBHS Implementation Timeline (as of 12/16/19)



August 2019 IBHS Regulations approved at IRRC October 2019 IBHS regulations were promulgated January 17, 2020 IBHS regulations to be effective

January 17, 2021 All providers must be licensed and enrolled for IBHS



OMHSAS Updates



OMHSAS website link:

http://www.healthchoices.pa.gov/providers/about/behavioral/inbehavioralhs/index.htm

- Providers must comply with the supervision requirements 90 days after the IBHS regulations are promulgated (1/17/20).
- All staff must meet the qualifications in the regulations 90 days after they are promulgated (1/17/20).
- For some staff, there are interim and final qualifications. The final
 qualifications for staff that provide BHT-ABA services must be met by July 1,
 2020.
- The final qualifications for staff that provide BHT services must be met by January 1, 2021.
- The final qualifications for a clinical director of an IBHS agency that provides ABA services must be met by July 1, 2022.
- Initial training requirements are required to be met 90 days after promulgation of the regulation (1/17/20).



OMHSAS Updates (cont.)



- New IBHS agencies must obtain a license within 90 days of promulgation (1/17/20).
- Unlicensed entities enrolled under the OMHSAS-16-07 bulletin and approved to provide ABA must obtain a license within 180 days of promulgation.
- IBHS agencies that currently have a base mental health license must obtain an IBHS license when their current license expires.
- All other IBHS agencies approved to provide IBHS must obtain an IBHS license within 1 year of promulgation.
- Annual quality improvement report requirement.



FAQ Review



OMHSAS has posted a FAQ on

http://www.healthchoices.pa.gov/providers/about/behavioral/inbehavioralhs/index.htm

Submit questions to RA-PWIBHS@pa.gov



Written Order Requirements



- A written order is based on a face to face interaction with the youth within
 12 months of initiation of IBHS
- Written by a licensed physician, licensed psychologist, certified registered nurse practitioner, or other licensed practitioner whose scope of practice includes diagnosis and treatment of behavioral health disorders and the prescribing of behavioral health services, including IBHS
- Services cannot be authorized one year past the date of the written order without a new order
- Written orders must be completed by staff who are ORP enrolled
- Includes the following:
 - Behavioral Health Diagnosis
 - Specifies the IBHS service, hours and setting
 - Clinical information that supports the medical necessity of the order
 - The measurable improvements that would indicate when services may be reduced, changed or terminated



Assessment for Individual, Group and ABA Services



- A face to face assessment is completed by a staff qualified to provide behavior consultation services or mobile therapy services within 15 days (30 days for ABA) of the initiation of services
- Assessment shall include the following:
 - Strengths and needs across developmental and behavioral domains
 - Strengths and needs of family system
 - Natural supports
 - Specific services needed to support the child's needs
 - Specific services needed to support parent/caregiver needs



Assessment (continued)



- Clinical information including:
 - Treatment history
 - Medical history
 - Developmental history
 - Family structure and history
 - Educational history
 - Social history
 - Trauma history
 - Developmental, Cognitive, Communicative, Social and Behavioral functioning
 - Other relevant clinical information
- Cultural, language or communication needs
- Summary of treatment recommendations



Individualized Treatment Plan for Individual, Group and ABA Services)



- Developed within 30 days (45 for ABA) of the initiation of services
- Reviewed and updated at east every six months
- Strength based and developed collaboratively with child and caregiver
- Must include the following:
 - Service type, setting and hours
 - How parent/guardian participation is needed
 - Specific goals, objectives, and interventions to address therapeutic needs
 - Timeframes



IBHS Regulations - Staff Supervision and Training



- Requires an administrative director and a clinical director role
- One (1) hour a month of supervision for BC and MT (One additional hour if the staff supervises a BHT)
- Requires direct observation of staff every six (6) months
- Limits Supervisor to 12 FTE supervisees
- Group supervision limited to 12 staff
- More detailed training requirements



Magellan Updates



- Expect all BHRS/ABA contracted agencies to accept calls from new families seeking BHRS/IBHS for evaluation/assessment/written order process regardless of ability to staff the prescribed services
- Providers should continue to prescribe BHRS until the network is able to accommodate request for IBHS
- Providers may follow the new IBHS regulations allowing for written orders (instead of Life Domain evaluations) to prescribe BHRS, but the authorization request must include an assessment (as outlined in the IBHS regulations)
- Magellan will issue contracts for IBHS after agencies are licensed and MA enrolled for IBHS. Provider contracts will keep BHRS and IBHS codes for 2020.
- Current authorizations for BHRS/ABA will continue until the last covered day of the authorization.



Magellan Proposed Authorization Process



- Written order language and proposed written order template
- Registration process for assessment
- Packet submission elements
 - Treatment Authorization Request (TAR) Form
 - Written order
 - Assessment
 - ITP
 - CANS
 - ISPTM summary note if BHT/RBT prescribed in school



Extended Assessment Program (Delaware and Montgomery County only)



- Magellan and Delaware and Montgomery County have decided to retire the Extended Assessment programs in 2020. This is based upon the new timelines for written orders and assessments and volume of new referrals anticipated.
- We want to thank the EAS programs for the years of support and great clinical work and coordination that they have done for children and families!
- The Extended Assessment programs will continue to accept new referrals and be prepared to offer written orders and assessments in 2020.
- Magellan will communicate when EAS is no longer an available service.



ISPTM Plan



- ISPTM's will no longer be required for authorization or re-authorization for BHRS/IBHS with the exceptions below:
 - When RBT or BHT is requested in the school setting. The meeting summary is required for the authorization packet.
- Magellan will require that ISPTM's be held for the following reasons:
 - When BHRS/IBHS services are recommended for longer than one year.
 Annual ISPT meeting's should be held for children still receiving BHRS/IBHS (at the one year, two year, three year mark etc.).
 - When a referral to a higher level of care is being considered.
 - When requested by family member or team member.
 - A Magellan representative should be included for any ISPT meetings intended for RTF referral or by family member request.
- Documentation of the ISPTM should be kept in member record and available for review upon request.



BHRS to IBHS Authorization Transition Plan



- Magellan proposes that agencies should continue to prescribe and request authorization for BHRS until the agency is contracted for IBHS.
- Magellan will alert the network when we have enough IBHS contracted agencies to meet the needs of new families being assessed for services.
- Once an agency is contracted for IBHS, as authorizations for BHRS expire, the youth should be considered for IBHS. If clinically appropriate, the youth should be recommended for IBHS and an authorization request submitted accordingly.
- Magellan does not plan to uniformly end BHRS authorizations and transition to IBHS authorization upon the agencies contracted date for IBHS.

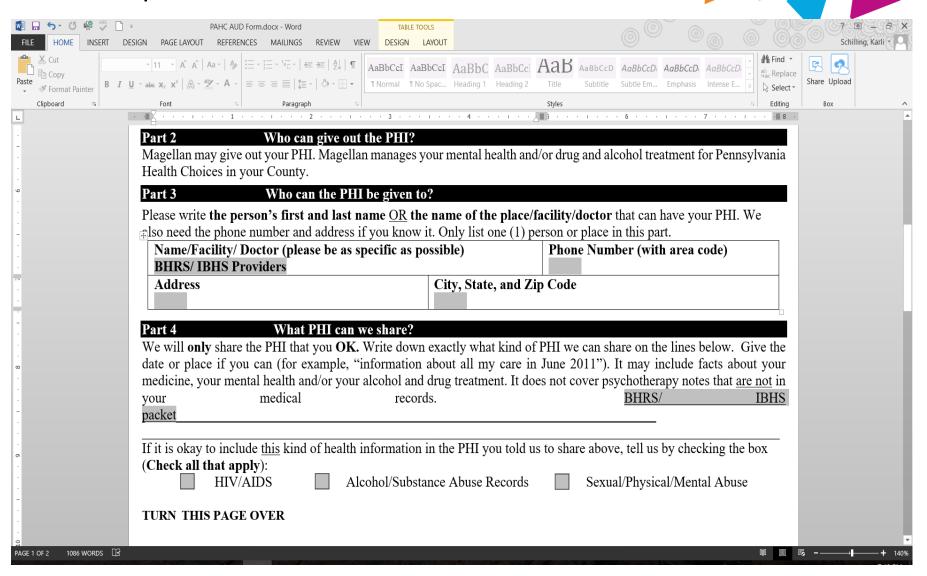
Authorization to Use and Disclose (AUD) Forms



- Effective immediately, as you work with your current treatment providers to complete AUDs (consent forms) to facilitate Magellan's ability to make referrals to providers for BHRS, please follow the below guidelines for Parts 3 and 4:
 - Similar to the current process, if you are requesting only certain providers, we will need a separate AUD for each provider for which they are authorizing a referral to be made.
 - As HIPAA permits one release to a "class of persons", if you are in agreement with sending referrals to all providers, please indicate "BHRS/IBHS providers" in both sections.
 - See screen shot on the next slide.



AUD Sample





Key Takeaways



- Continue to refer families to the Magellan contracted BHRS/ABA agencies for written order and assessment process for IBHS consideration.
- BHRS will continue to be prescribed until the IBHS network is developed.
- New staffing requirements may impact current teams.
- The Magellan online provider search and provider directory will be updated to include IBHS agencies once contracted.
- Families should be encouraged to reach out to Magellan directly if they experience any barriers with accessing services.
- Current authorizations for BHRS/ABA will continue until the last covered day of the authorization.
- We do not want families to experience a disruption in services while we implement IBHS.





Questions? Suggestions?



Magellan Contacts



- Magellan IBHS email all questions should be sent to the following: IBHS@MagellanHealth.com
- Please review the <u>www.magellanofpa.com</u> IBHS resource page for additional and up to date information at the following link: <u>https://www.magellanofpa.com/for-providers/services-programs/ibhsbhrs/</u>





Thank you!



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