

STATE OF ALASKA

DEPT. OF HEALTH AND SOCIAL SERVICES

DIVISION OF BEHAVIORAL HEALTH

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August 29, 2011

Dear DBH Grantee Provider:

RE: **Guidance Document:** *Integrated Behavioral Health Regulations* – Transition issues involving assessments, treatment plans and treatment plan reviews.

This letter serves to provide guidance and direction related to transition issues in anticipation of the Integrated Behavioral Health Services Regulations, effective on October 1, 2011. Specifically, this letter outlines three issues of transition to new regulatory timeframes for performing client assessments, treatment plans and client status reviews. These regulatory changes will require specific action and planning on the part of your agency staff.

Current regulations, which remain in effect through September 30, 2011, outline the following timeframes:

- Mental Health Assessment/Re-Assessment – conducted within one week of entry into treatment and updated as new information becomes available; service limit of 3 hours for initial assessment and one hour every 6 months of continuous treatment
- Substance Abuse Assessment/Re-Assessment – within two weeks of entry into treatment and updated as new information becomes available; service limit of two per 12 month period
- Mental Health & Substance Abuse Treatment Plan Review – at least every three months for recipients under age 21 and every six months for recipients age 21 and over

The new Integrated Behavioral Health regulations, which will become effective on October 1, 2011, outline the following new timeframes:

- Professional Behavioral Health Assessment – conducted upon admission to services and during the course of active treatment as necessary and updated as new information becomes available; service limit of 1 assessment every 6 months
- Behavioral Health Treatment Plan – based on behavioral health assessment and remains current based upon periodic reviews utilizing the *Client Status Review* form which is administered and reviewed every 90 to 135 days for all recipients.

Specific to client status reviews the following describes the method by which agency's can adjust to the new review timeframes:

From October 1, 2011, all treatment plan reviews for all clients under age 21 will be completed no later than January 1, 2012 and no later than April 1, 2012 for clients over age 21. This will give providers the greatest amount of flexibility to determine your own transitions, and allows the use of the current treatment plan review timelines to naturally transition into the new review timeline of 90-135 days.

Division of Behavioral Health

Guidance Document I: *Integrated Behavioral Health Regulations* – Transition issues-- assessments, treatment plans and reviews

August 29, 2011

Note: This transition strategy only applies to clinical records opened prior to 10/1/11. Any client records opened on or after 10/1/11 must be managed according to the requirements specified in the new integrated regulations.

The October 1, 2011 implementation date will have an impact on services listed on treatment plans. Essentially, treatment plans may need to be amended prior to October 1, 2011 in the following ways: (1) Remove discontinued services, and/or (2) add new services. The attachment "Services Crosswalk" identifies services that remain the same, are discontinued, or are new services.

The Division will issue additional guidance documentation regarding *Program Approval*, assignment of *Medicaid Provider Numbers*, and processes related to *Service Authorization*.

The Division recognizes that providers have been actively engaged in preparations for the implementation of the integrated regulations, and appreciate your efforts and associated challenges, as well. We appreciate your patience during this major systems transition.

Sincerely,



Melissa Witzler Stone, Director
Division of Behavioral Health

Attachment: Services Crosswalk

CROSSWALK OF MEDICAID REIMBURSABLE BEHAVIORAL HEALTH SERVICES Previous Regulations vs. New Regulations

Previous Substance Abuse Services	Previous Mental Health Services	New Integrated Behavioral Health Services
		Behavioral health screening (AST)
Drug/Alcohol Intake Assessment	MH Intake Assessment	1. Substance Use Intake Assessment 2. MH Intake Assessment 3. Integrated BH Intake Assessment
		Behavioral health treatment plan review with client status review of treatment outcomes (CSR)
	Psychiatric Assessment	Psychiatric Assessments
	Psychological Test/Evaluation	Psychological Test/Eval
Care Coordination Svcs.	Case Management Services	Case Management Svcs. <i>(clinical supervision added)</i>
Medication mgmt.	Pharmacologic mgmt.	Pharmacologic mgmt.
	Psychotherapy Services <i>Individual Family ; Multi-Family Group</i>	Psychotherapy Svcs. <i>Individual Family ; Multi-Family Group</i>
Methadone or antabuse admin		Methadone or antabuse admin
	Short-Term Crisis Intervention	Short-Term Crisis Intervention
		Short-Term Crisis Stabilization
Counseling <i>Ind, Family, Grp</i> Skills Training Intensive Outpatient Intermediate Services	Skills Development Services <i>Individual Group</i>	Comprehensive community support services (adult) <i>Individual Group (Includes Peer Support)</i>

Previous Substance Abuse Services and Rates	Previous Mental Health Services and Rates	New Integrated Behavioral Health Services and Rates
Counseling Skills Training Intensive Outpatient Intermediate Services	Skills Development Services <i>Individual</i> <i>Family</i> <i>Group</i> Behavioral rehabilitation services	Therapeutic behavioral health services (child) <i>Individual</i> <i>Family</i> <i>Family</i> <i>Group</i>
	Recipient support services	Recipient support services
	Medication administration services	Medication administration services
Medical evaluation of a recipient not receiving methadone treatment		Medical evaluation of a recipient not receiving methadone treatment
Medical evaluation of a recipient in a methadone treatment program		Medical evaluation of a recipient in a methadone treatment program
Methadone or antabuse administration		methadone or antabuse administration
intake physical for detox programs		intake physicals for detox programs
treatment plan review for a recipient of methadone		treatment plan review for a recipient in a methadone treatment program
	Day treatment services for children	Group day treatment services for children
		ambulatory detox services
		Clinically managed residential detox
Detox services		Medically monitored residential detox
		Clinically Managed Low Intensity Residential SA Treatment
		Clinically managed Medium intensity Residential SA Treatment
		Clinically Managed high Intensity Residential SA Treatment
		Screening and brief intervention services