

Behavioral Health Clinics (BHCs)

New Options for Providers of Community-Based Behavioral Services

June 2018



Behavioral Health Clinics Webinar

Housekeeping Items:

- Phone lines are in listen only mode
- Questions can be submitted through the "chat" function on the right hand side of the screen.
- Answers to questions will be posted on HFS' website as a Behavioral Health Clinic FAQ document



Webinar Topics

- Purpose of Behavioral Health Clinics
- Administrative Requirements
- Administrative Review Process
- Enrollment Process
- Program Approval
- Questions and Answers



Purpose of BHCs



Expanding Provider Base

- Proposed in 89 IL Admin Code 140 at:
 - Illinois Register (February 16, 2018)
 Volume 42, Issue 7, Pages 3040 of the 2018
- A new provider of Medicaid Rehabilitation Option (MRO) Mental Health Services and Targeted Case Management (TCM)*

^{*} BHCs may provide all of the community-based MRO/TCM mental health services, with the exception of Assertive Community Treatment and Psychosocial Rehabilitation.



Expanding Provider Base

- Expected to:
 - Fill the gaps in the service delivery system
 - Provide population-specific / disease-specific programming
 - Increase access to high-quality mental health services
 - Provide services to children and adults under the Illinois Medical Assistance Program (FFS & MCO)
 - Provide services at times/locations convenient to the population served – <u>atypical hours and in the field</u>



Administrative Requirements



Proposed Rule 140

- Streamlined administrative requirements:
 - Reduce administrative burdens
 - Reduce provider costs
 - Place the provider's focus on quality service delivery and innovation
- Enrollment* is based upon:
 - Organizational policies and procedures
 - Availability of properly qualified and trained staff
 - No longer defined by service documentation review

*previously known as "certification"



140.499 / Table O Requirements

- Administrative Requirements include:
 - Operational policies/procedures
 - Cultural competency policies
 - Psychiatric Resource access
 - Coordination of Services

"Coordinate service delivery with the individual's primary care provider, care coordination entity, and/or managed care entity"



140.499 / Table O Requirements

- Administrative Requirements include:
 - Safe and inviting space
 - Emergency disaster plans
 - Fire Marshal inspection clearance letter
 - Full-time LPHA Clinical Director
 - Enhance individual engagement through the:
 - "Availability of services during non-traditional working hours (e.g., weekends and evening periods); and
 - Delivery of services in the home or other community-based settings."



140.499 / Table O Requirements

- Administrative Requirements include:
 - Personnel records include background checks
 - Evidence of liability insurance
 - Referral to substance use services for clients needing SUD services.



Administrative Review Process



BHC Administrative Review

- BHCs that were previously certified as CMHCs will be granted a one-time grace period and may be immediately converted into BHCs
- BHCs will be subject to standardized HFS OIG review related to Fraud, Waste and Abuse
- BHCs that contract with an HFS-contracted MCO may be subject to review under the terms of their agreement with the MCO
- HFS anticipates annual, onsite reviews to ensure compliance with 140.499 and Table O





- BHCs can provide all Medicaid Rehabilitation Option mental health services and Targeted Case Management, with the exception of ACT and PSR
- BHCs seeking to provide Community Support Team or Intensive Outpatient will be required to obtain Program Approval
- Program Approval will be completed by HFS or its designee
- The Program Approval process is outlined in 140.Table N



- During the enrollment process, the BHC must indicate its intent to provide CST or IOP
- Provider must submit initial documentation that attests to the following:
 - Individuals will receive all required interventions
 - Services will be provided in settings and at times required
 - Required staffing ratios will be maintained
 - Required qualifications and training of staff will be maintained
 - Required target populations will be served
 - Required Utilization Management will be conducted



- HFS will review the initial documentation provided
- Provider will be notified once review is completed
- HFS will conduct 90 day on-site review, if required
- Provider will submit additional documentation to attest to compliance with all Rule 140 requirements
- Provider will cooperate with any on-site reviews



Enrollment



IMPACT

 Each provider intending to become a Behavioral Health Clinic must enroll through HFS' Provider Enrollment System (IMPACT):

https://www.illinois.gov/hfs/impact/pages/default.aspx

- Providers must have a unique Provider ID / NPI combination for each enrollment type
 - For example, providers seeking enrollment as both a CMHC and a BHC may not utilize the same NPI across provider types



IMPACT

- Step 1: Determine which Provider Type you wish to enroll as
- Question to consider:
 - Does my organization want to provide ACT or PSR?

If <u>YES</u>, you must seek certification and enrollment as a CMHC If <u>NO</u>, consider enrollment as a BHC



IMPACT – BHC Enrollment

IMPACT Provider Type Name	IMPACT Specialty Name	IMPACT Sub-Specialty Name	Services
Behavioral Health Clinic	BHC Outpatient	No Subspecialty	Assessment and Treatment Planning Services
			Case Management
			Crisis Intervention
			Community Support
			Medication Administration
			Medication Monitoring
			Medication Training
			Therapy/Counseling
	BHC Day Treatment	Intensive Outpatient	Intensive Outpatient (IOP)
	BHC Team Based Services	Community Support Team	Community Support Team (CST)
	BHC Crisis Response	Mobile Crisis Response	Mobile Crisis Response (MCR)
		Crisis Stabilization	Crisis Stabilization



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