



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE
OFFICE OF CHILDREN, YOUTH AND FAMILIES
P.O. BOX 2675
HARRISBURG, PENNSYLVANIA 17105-2675

Richard J. Gold
Deputy Secretary for
Children, Youth and Families

JUN 26 2009

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Individual letters were sent to the enclosed list of C&Y Administrators and Chief JPOs with copies to County Commissioners and President/Juvenile Court Administrative Judges

Dear :

The Office of Children, Youth and Families (OCYF) has been working together with the Office of Mental Health and Substance Abuse Services (OMHSAS) to change policy related to payment responsibility for children in substitute care placed in non-hospital drug and alcohol residential facilities. Current policy states that children in substitute care who are placed in a non-hospital drug and alcohol residential facility in the same HealthChoices (HC) zone as the county with custody/court supervision remain the responsibility of the Behavioral Health Managed Care Organization (BH-MCO) provided that the BH-MCO has authorized the placement. If the child is placed in a different HC zone than the county with custody/court supervision, the child reverts to Fee-For-Service (FFS). FFS currently does not cover non-hospital drug and alcohol facility placements. Last year your agency completed a survey related to children in substitute care who are placed in Department of Health-licensed drug and alcohol facilities and you, along with the MCO, reviewed provider charts and certified the information accurate. This data was used to assist OMHSAS in establishing BH-MCO capitation rate adjustments. All your work and cooperation has paid off and culminated in a revised policy which will benefit children in substitute care.

As a result of the revised policy, BH-MCOs are required to review medical necessity and determine authorization for children in substitute care who are placed in a non-hospital drug and alcohol residential facility regardless of whether the provider is located within or outside of the member's HC zone. If the BH-MCO authorizes the placement, they will be responsible for payment.

In addition to a policy change related to non-hospital drug and alcohol facilities, there is a change to the policy related to children who are placed in foster homes, shelters or group homes. Current policy states that children in substitute care who are placed in a foster home, shelter or group home in the same HC zone as the county with custody/court supervision remain the payment responsibility of the BH-MCO for outpatient behavioral health services. If the child is placed in a different HC zone than the county with custody/court supervision, the child reverts to FFS for outpatient behavioral health services. Beginning August 1, 2009, children in substitute care will remain the payment responsibility of the BH-MCO for outpatient behavioral health

services regardless of the zone where placed. For youth who are placed in juvenile detention centers out of zone, coverage will remain with the BH-MCO for the first 35 days, at which time it would convert to FFS.

These policy changes will promote continuity of care management during residential stay; allow BH-MCO care managers to participate in discharge planning and coordination of care for the children; eliminate incentives for a child to be placed out-of-zone; and align responsibility for all behavioral health care services under the HC Behavioral Health Program. It will also relieve financial burden from county children and youth agencies and juvenile probation offices who are currently paying for behavioral health services, particularly non-hospital drug and alcohol residential. Additionally, it will eliminate the change of payment systems (HC to FFS to HC, etc) for children who move in and out of zone.

The date for the implementation of these new policies is August 1, 2009. Use of facility/placement codes is not affected; please continue to use the current codes.

OMHSAS will begin conversion the first week of July for children currently in impacted placement settings. Enclosed please find an Excel spreadsheet listing children in the custody of your agency or under the supervision of the juvenile court who are currently placed in a different HC zone in one of the following settings: foster care, shelter, group home or non-hospital residential drug and alcohol facility. They are coded PC/J 31 or 33 and have a facility/placement code of 03, 05, 58 or 63.

In preparation for the policy change, we are requesting that you reconcile the enclosed list with your own database to ensure that the children listed are in fact still in county custody or under court supervision and that they have the correct facility/placement code and county where placed code. The reconciliation process will ensure that a child's treatment is not disrupted.

OMHSAS will begin conversion July 1, 2009; therefore it is imperative that you have your list reconciled and returned to Ms. Darlene Black of my staff no later than July 10, 2009. If the enclosed list contains incorrect information, you will need to contact your local county assistance office via the CY-60 and provide correct information.

During the first week of July, OMHSAS will forward the enclosed information to the respective BH-MCO to ensure that the child is enrolled/re-enrolled as their member. For those children in non-hospital drug and alcohol facilities, the BH-MCO will conduct a continued stay review, apply the American Society of Addictions Medicine (ASAM) Criteria for Adolescents, and process an authorization for services if medically necessary. If the authorization is denied, the member or his/her advocate has the right to file a grievance with the BH-MCO and/or the Department of Health. Member services staff will assist members or their advocate with this process. If a service is determined to not be medically necessary, and the county children and youth administrator or juvenile probation officer chooses to continue the placement, it will be funded through local county funds only.

If you have any questions, please contact Ms. Darlene Black by phone (717) 787-3987 or via email at dablack@state.pa.us.

Very truly yours,

A handwritten signature in black ink that reads "Richard J. Gold". The signature is written in a cursive, flowing style.

Richard J. Gold

Enclosure

- c: Mr. Charles Songer, Executive Director, PA Children & Youth Administrators
- Mr. James Anderson, Executive Director, Juvenile Court Judges' Commission
- Ms. Joan Erney, Deputy Secretary, OMHSAS
- Ms. Darlene Black, Office of Children, Youth & Families
- HealthChoices Liaisons
- ACCESS Plus Liaisons