



## **Community Behavioral Health: Provider Notice Regionalized Intensive Behavioral Health Services Delivery and Staffing Under Alternative Payment Arrangement November 19, 2020**

Community Behavioral Health (CBH) would like to thank all Intensive Behavioral Health Services (IBHS) providers for their efforts in working with us to support CBH members during this unprecedented time as we continue to confront the challenges associated with COVID-19. CBH is aware that the pandemic has significantly impacted the implementation of the regionalization of IBHS, as outlined in the Request for Proposal (RFP). This Notice is being issued to provide clarification regarding the staffing and delivery of IBHS for the remainder of the 2020 – 2021 school year. Please note that this Notice is only applicable for the Regionalized IBHS providers who were awarded a contract through the IBHS RFP.

For the duration of the current Alternative Payment Arrangement (APA), the following requirements are in place for the regionalized IBHS providers:

- Providers are required to submit all claims for services delivered via telehealth with the identification of the Place of Service (POS) 02 code.
- Providers are required to maintain continuity of care for members authorized for IBHS. Providers should be working in concert with members, their families, and referring providers to carefully evaluate whether IBHS should be delivered via telehealth, in-person, or a combination of both, and the method of delivery should be outlined in the Continuity of Operations Plan (COOP) submitted to CBH. If requested by the member or member's family, or deemed clinically necessary, it is expected that providers deliver in-person treatment following the Centers for Disease Control and Prevention (CDC) and Philadelphia Department of Public Health (PDPH) guidelines.
- Providers are expected to accept new IBHS referrals.
- Providers are required to notify CBH, via their Provider Relations Representative, if they have temporarily or permanently ceased operations (consistent with the CBH Provider Agreement Section VI, Events of Default).
- The APA Payment must be used by the provider for continued operations, which includes payment to the provider workforce directly involved in ensuring continuity of care for CBH members. CBH is not requiring IBHS providers to hire staff that are full-time, benefit-bearing under the current APA model. However, providers must have a full complement of staff (Behavioral Consultation [BC], Mobile Therapy [MT], and Behavioral Health Technician [BHT]) to meet the current members authorized for IBHS,

but not to exceed Behavioral Health Rehabilitative Services (BHRS) staff positions prior to the pandemic if the provider delivered BHRS.

- Providers are not required to hire the IBHS Family Peer Specialist position, as outlined in the RFP under the current APA model.
- Providers are required to hire the Care Coordinator position, as outlined in the RFP by the end of the 2020 – 21 school year.
- Providers will be required to complete the [CBH COVID-19 APA Expense Form](#) to provide evidence of how Medicaid payments under the APA were spent on a monthly basis. These expense forms for each respective month will be due to CBH 10 days after the end of that month where the APA Payment is in effect.
- Providers will continue to have the opportunity to request reconciliation on a monthly basis, if the actual expenses exceed the APA allocation.
- Beginning in January 2021, if the provider's IBHS APA amount exceeds that of the monthly expenses, CBH reserves the right to recoup some portion of the APA funds.

Please direct all questions to your assigned Provider Relations Representative.