

In alignment with the [CBH Provider Network Termination and Operational Policy](#), this checklist is intended to establish uniform, compliant processes for managing provider contract terminations or provider termination of a specific level of care and any identified significant network change that could affect member access, continuity of care, and regulatory network adequacy requirements. These steps are intended to ensure member safety, continuity of care, regulatory compliance, and coordinated communication with CBH, OMHSAS, and county authorities whether this is a voluntary or involuntary termination.

Section 1: Required Notification to Behavioral Health Managed Care Organization

- Written notice submitted to CBH Leadership and Provider Representative via the [CBH Provider Termination Form](#)

- Notice submitted no fewer than 90 days prior to anticipated closure or service relinquishment (unless otherwise approved)

- Effective date(s) clearly identified

- Level(s) of care affected identified by license number

- Current member census submitted

- Identification of members with complex needs/multi system involvement, if applicable

- Designated provider transition lead identified

- Attestation that no new admissions will occur after notice date

Section 2: Required OMHSAS and Licensing Body Notifications

- Written notice submitted to PA Department of Human Services (OMHSAS and/or DDAP)

- Written notice submitted to DBHIDS as applicable

Section 3: CBH Contract Requirements

- Final date of authorized services confirmed with BH-MCO

- All open authorizations reviewed and disposition confirmed

- Transition plan coordinated with CBH Clinical Care Management, prioritizing individuals and populations with high risk and/or more complex clinical involvement

- Final claims submission timelines confirmed

- Outstanding audits, overpayments, or corrective actions addressed

Section 4: Member Continuity of Care

- Individualized transition plans completed for all members

- Transition plans include receiving provider name and start date

- High-risk members prioritized for warm handoffs

- Medication continuity ensured

- Crisis response coverage maintained through final service date

- Contact alternative agency leadership for potential to absorb staff

Section 5: Member Notification Requirements

- Written notice provided to members

- Notices provided in plain language and culturally responsive formats

- Notices include:
 - Reason for service change
 - Effective date
 - Transition plan information

Section 6: Behavioral Health Records

- Records maintained per PA record retention requirements

- OMHSAS-compliant record storage or transfer plan in place

- Member consent obtained for records transfer, when required

- Receiving providers provided access to records as appropriate

- Members informed how to access records post-closure

Section 7: Stakeholder and Government Communications

- County mental health/ID office notified and engaged

- OMHSAS regional office notified

- Courts, probation/parole, or justice partners notified (if applicable)

- School partners notified (if applicable)

- Hospitals and referral partners notified

- Communication coordinated with CBH messaging

- Communication with applicable City council members, in collaboration for CBH/DBHIDS

- Media or public inquiry escalation plan identified

Section 8: Workforce and Service Stability

- Staffing plan ensures safe and adequate coverage through final service date

- Required supervision maintained per OMHSAS regulations

- Staff trained on transition and referral procedures

Section 9: Post-Closure Obligations

- Post-closure contact identified

- Response process for record requests established

- A cross-departmental transition team will meet weekly ensuring continuity of care for CBH members during the active transition phase, then moving to every other week and monthly during the monitoring phase. Ad-hoc meetings will be scheduled for any urgent issues. Debrief meeting will be utilized to close out all action items and determine if any process improvement areas have been identified for future transitions.
