

Jan 10, 2025 | 📅 CASP Pennsylvania SAG

Attendees:

Notes

- During last call discussed ABA in PA's plan to address LBA licensure (stand alone license) this upcoming session.
- Jennie shared a link to the document
 - <https://docs.google.com/document/d/18J2t02geMcXbw1ssXTfi52FKk8kZhG5xwKdlyARpedM/edit?usp=sharing>
- Discussed MCE and County funding issues for IBHS benefit
 - Issues with Magellan (MBH) and CCBH- will not expand services to new physical brick and mortar centers
 - There was a rate increase proposed and the increase is on hold as well.
 - Aspire team shared their activities with Magellan thus far (since mid December)
 - Magellan continues to indicate this is not a network adequacy issue, and they are not obligated to expand services within the county.
 - Magellan also indicates that this is an over utilization issue and asked providers to reduce hour requests
 - Montgomery County is aware of the issue but is not communicating effectively
 - Aspire met with legislators yesterday to discuss these concerns.
 - HHS stated that IBHS is a Community Based Service and therefore whether or not center based services are available is not necessarily relevant.
 - SHO 24-0005 letter addresses EPSDT requirements
 - <https://www.medicaid.gov/federal-policy-guidance/downloads/sho24005.pdf>
 - Will try to get language in writing about service exclusions and if it is a hard cap- can escalate to CMS
 - Submitted RTK request yesterday
 - Working to get communication from DHS and OMHSAS
 - Actuarial firm underestimated budget by about 6B
 - BHMCOs are trying to protect bottom line, instead of focus on legal requirements
 - Discussion about the review/ update in Q2
 - Try to get SCA- reference language from SHO 24-0005 letter "If an EPSDT-eligible child does not have timely access to a network provider for medically necessary care, the MCP must arrange for and cover medically necessary covered services out of network, including out of state if necessary, for as long as the MCP's provider network is unable to provide the medically necessary services."

- Recommended Grassroot advocacy efforts to communicate these concerns directly to State Reps.
 - Consider a Voter Voice Campaign & develop messaging
 - Try to align ask with RCPA as much as possible- Drew will connect
 - What contractual or regulatory language allows the BHMCOs to limit or deny expansion
 - Possible MHPAEA violation
 - <https://www.dol.gov/agencies/ebsa/about-ebsa/our-activities/resource-center/fact-sheets/final-rules-under-the-mental-health-parity-and-addiction-equity-act-mhpaea>
 - <https://www.federalregister.gov/documents/2024/09/23/2024-20612/requirements-related-to-the-mental-health-parity-and-addiction-equity-act>
 - <https://www.federalregister.gov/documents/2023/08/03/2023-15945/requirements-related-to-the-mental-health-parity-and-addiction-equity-act>

Action items

- ☐ Create Voter Voice Campaign- Kristine to develop
- ☐ Attempt to get authorization through an SCA- Aspire- as appropriate
- ☐ Reach out to PA Ombudsman??
- ☐ Reach out to PA Dept. of Insurance to see if they can provide any information RE: BHMCO's responsibility to pay copays/ deductibles/ coinsurance for beneficiaries with Medicaid as secondary.- Amanda Mellton
- ☐ Review IBHS regulations (5240)- Mariel
 - [w OMHSAS IBHS Regulatory Compliance Guide \(RCG\) Chapter 5240 12.23.2024 \(1...](#)
- ☐ Pull copy of BHMCO contract- Kim

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Attendees:

Kristine Quinby
 Rebecca Crocket
 Arielle Duinkerken
 Kim Tomlinson
 Jennie England
 Sarah Vega
 Amanda Mellott
 Gosia Linkfeldt
 Jeanine Weichelt

Previous Action items

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- ☐ ~~OMHSAS IBHS Regulatory Compliance Guide (RCG) Chapter 5240 12.23.2024 (1...~~
- ☐ Pull copy of BHMCO contract- Kim

Notes:

- RCPA Capital Day (3/26 press conference from 10-11am Main Rotunda)
- Voter Voice survey
 - Kristine completed and was sent out to agencies and families
- BI had one family that fit; and the family was no longer interested
- HHF had meeting with CBH about single case agreements
 - CBH is not enrolling anymore centers even if not in contract
- Continued to discuss center credentialing and closed networks
- Discussed education surrounding place of service recommendations and written orders
- Amanda reached out to Ombudsman (pivoted back to DHS) there is a feedback form
- invite senators and legislators to centers for tours
- need a consistent ask (need a rate increase); put the place of service issues to the side
- voter voice by February 18
- Kim requested Magellan's contract with Montgomery County, requested from the solicitor's office
- BI getting denials on services based on POS
 - denying saying can only provide in one POS of service during the day
 - call and reprocess it (Magellan specifically, system isn't recognizing it as a separate POS)

Action items

- ☐ Send out parent survey to other providers-Jennie
- ☐ Attempt to get authorization through an SCA- Aspire- as appropriate
- ☐ Email DHS via query form-Jennie
- ☐ Discuss lobbyist-Mariel
- ☒ ~~Review IBHS regulations (5240)- Mariel~~
- ☐ ~~OMHSAS IBHS Regulatory Compliance Guide (RCG) Chapter 5240 12.23.2024 (1...~~
- ☐ Pull copy of BHMCO contract- Kim
- ☐ Share voter voice campaign and push until 2/18
- ☐ Scott Martin (Lancaster) is the Chair of the Appropriations and Minority Chair is Vincent Hughs (Montgomery County)-all members

- ☐ Complaint number for DHS and MCO-Sarah

Mar 7, 2025 | 📅 CASP Pennsylvania SAG

Previous Action items

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- ☒ ~~Discuss lobbyist- Mariel~~
- ☒ ~~Review IBHS regulations (5240)- Mariel~~
- ☒ ~~[OMHSAS IBHS Regulatory Compliance Guide \(RCG\) Chapter 5240 12.23.2024 \(1...](#)~~
- ☐ Pull copy of BHMCO contract- Kim
- ☒ ~~Share voter voice campaign and push until 2/18~~
- ☒ ~~Scott Martin (Lancaster) is the Chair of the Appropriations and Minority Chair is Vincent Hughs (Montgomery County)- all members~~
- ☐ Complaint number for DHS and MCO-Sarah

Notes:

- RCPA Capital Day (3/26 press conference from 10-11am Main Rotunda)
- IBHS Parent Survey Data review
- Provider Data review
- Review OMHSAS bulletin from June 2022 (center-based services)
- share language for sending letters to representatives
- lobbyist?
- discussed MHPEA (access to different MCOs vs no option for BHMCOs)
- don't have to select MCO, can have straight medicaid (BHMCO is assigned by county and there are no choices regardless of MCO)
- current PA network adequacy guidance will need to change by 2027
- rate increase: will any additional money trickle down to providers (blue book will show per member per month estimate)
- reviewed IBHS parent access survey
 - strategically contact legislators in these counties, may have heard about barriers with IBHS and ABA and share the data
- have to pass by June 30, has been extended (probably will not pass budget on time)

Action items

- ☐ Mariel connect with Fali on MHPAEA
- ☐ Mariel generating map of PA with counties that have responses
- ☐ Add legislator to referral documentation
- ☐ Jennie and Mariel create timeline for execution

4/25/2025

Action items

- ☐ Mariel connect with Fali on MHPAEA
- ☒ ~~Mariel generating map of PA with counties that have responses~~
- ☒ ~~Add legislator to referral documentation~~
- ☒ ~~Jennie and Mariel create timeline for execution~~
- ☒ ~~Amanda Mellott to reach out to providers for network adequacy~~
- ☐ Everyone work on provider engagement
- ☐ Everyone send out messages to state representatives
- ☒ ~~Jennie to post letters for state reps~~
- ☐ Amanda reach out on linked in to CASP members about joining the PA meeting
- ☐ Scott to post on the group about PA Health Law (website link)

Notes:

-OMSAHS update from 4/24

<https://paproviders.org/omhsas-data-shows-significant-increases-in-bh-mco-denials-of-services/>

-letter templates to state reps and senators

5/16/2025

Action items

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- ☒ ~~Amanda Mellott to reach out to providers for network adequacy~~
- ☐ Everyone work on provider engagement
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- ☒ ~~Jennie to post letters for state reps~~
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- ☒ ~~Scott to post on the group about PA Health Law (website link)~~

1. Follow up on letters to state reps and senators
2. IBHS access survey
3. Outreach to State Reps and Senators
4. Connect with RCPA again?
5. PAHLC coming to next meeting (send questions by 6/1)
6. CMS put out link for providers that may be committing fraud

CMS:

Fraud alert link [CMS sets up fraud center while contractor rolls out new tool](#)

Voter Voice Campaign about budget (please sign up and share with others)
<https://www.votervoice.net/CASP/campaigns/120217/respond>

Link to the Survey Monkey here:
<https://www.surveymonkey.com/r/L9XLSHB>

Contact the Governor (families)

<https://www.pa.gov/governor/contact-us.html>
Sms:717-788-8990

Parents can text the governor to share about their ABA or IBHS services.
Make sure that parents note how long it took them to access care and how many providers they needed to contact, even if they are very happy about the services they are currently receiving.

Messaging should include that they wish more families could access care and that they could access care faster.

QR code for parent IBHS survey



6/20/2025

Action items

- ☐ Mariel connect with Fali on MHPAEA

- ☐ Everyone work on provider engagement
- ☐ Everyone send out messages to state representatives

1. Presentation from Marissa
2. IBHS access survey closed
3. RCPA, CASP, and ABA in PA working on scheduling a collaboration meeting
4. Day to text the Governor (date for messaging is
 - a. How long have you been waiting on services? Access issues?
 - b. Positives of IBHS? How providers have supported their families?
 - c. # of providers that you had to contact
 - d. Faster access for more families
 - e. Transportation issues
 - f. Staffing issues for staffing services (do you have what you need)

7/25/2025

Action items

- ☐ Everyone work on provider engagement
 - ☐ Everyone send out messages to state representatives
1. CASP Parent Survey review (Mariel)
 2. OMHSAS and OCDEL licensure requirements for centers (has anyone else heard this?)
 3. Peer to peer (Aspire recently had one where psychologist approved hours, in center, but instructed us to recommend home for next auth (at least 20 hours); asking questions about parents employment status
 4. Any new business?

8/22/2025

Action items

- ☐ Everyone work on provider engagement
 - ☐ Everyone send out messages to state representatives
1. Rural Health Feedback
 2. OMHSAS and OCDEL licensure requirements for centers
 - a. Kim: last year during easter region licensing inspection; looking to update IBHS regs to include safety regs for facility (e.g., smoke detectors, fire drills, fire safety, emergency preparedness); followed up this year (hasn't been discussed with the licenser)
 - b. Kristine: unclear communication from OMHSAS
 3. Early Intervention
 - a. Common in other states

- b. Related to how dollars come from the fed
 - c. 1915 letter that says services should be in the natural environment
- 4. Expansions
 - a. BI closing location and relocating
 - b. CCBH allowed BI to enter network
- 5. PA budget
 - a. No active budget
- 6. Peer to peer
 - a. Refer questions about CPT codes to ABA coding coalition
 - b. Reach out to network manager with concerns surrounding peer reviews
- 7. New business
 - a. Next meeting on 9/19 @ 10 am

9/19/2025

Action items

- ☐ Everyone work on provider engagement
- ☐ Everyone send out messages to state representatives
- 1. PA budget
- 2. Interim Session Planning
 - a. Kristine Q. (Frank Barry) (proponent for special needs)
 - b. Kristine send information from ABA in PA on committees that were targeted during push for licensure
 - c. <https://www.palegis.us/senate/committees/committee-list>
 - d. <https://www.palegis.us/senate/committees/33/health-and-human-services?sessyr=2023>
- 3. Other Items
- 4.
 - a. Amanda Mellott: Colorado and North Carolina (Colorado is a non-MCO state a lot of collaboration with COABA), NC (budget decrease), work group hired by CMS to make a determination
 - b. CBH said that at state-level requiring all providers to do HL7 LOINC
 - c. OMHSAS LOINC codes tied to program improving Suicide Prevention and Community Resiliency (Jennie outreach to Senator Collette and Representative Ceratto)
 - d. CBH said family can waive to do this, appears to involve systems that providers of ABA services don't have
 - e. Magellan secondary claims being automatically denied, must call to have them reprocessed. Issue on Magellan's end and they are working on it without a timeline for solution (it delays payment for providers)

11/21/2025

Action items:

- ☐ Everyone work on provider engagement

1. PA budget

- a. Passed about two weeks ago
- b. Anyone hearing from MA about rate increases or expansion approvals
 - i. Magellan
 - ii. Helping Hands had expansion requests approved through CCBH
 - iii. Press Release: Magellan acting a BH-MCO for Somerset and Bedford Counties (New Name: New Healthchoices)
 - iv. Gray Skies Blue LLC: Magellan approved center Johnstown (2023), but won't approve expansion to Bedford/Somerset

2. Interim Session Planning

- a. Time to start meeting with people to establish relationships
- b. Assign people to reach outs
 - i. Put on SAG group and people should put their names in

3. Other Items

- BH-MCO audit:
 - Overpayment for CMS rule of eights
 - Coding Coalition sent letter to OMSAHAS; not following CMS rounding guidance
- Mariel to connect Jennie with Dan (authorization)
- Continuity of Care