

Action Plan for Implementation of Consistent b(3) Services in Section 1915(b) Capitated Waiver Program

The State of Washington Section 1915(b) Capitated Waiver Program is currently on a second extension which will end in September 2010. During a telephone call between Division of Behavioral Health Services (DBHR) and CMS on August 4, 2010, the following issue was identified as a barrier to CMS approval. This Action Plan proposes necessary steps to address the CMS requirement that b(3) services must be available to individuals being served under the waiver throughout Washington State (state wideness). Currently, there are several Regional Support Networks (RSNs) that are not providing some or all of the b(3) services. As discussed during calls with CMS, the outcome of this implementation plan will be one of the following options:

- Washington State will ensure all RSNs are able to make available all three of the current b(3) services to the individuals they are responsible for serving. This will require additional funding and adjustment of the RSN capitation rates.
- Washington State will reduce the number of b(3) services and ensure all RSNs are able to make available all of the remaining b(3) services to the individuals they are responsible for serving.
- Washington State will cease to offer b(3) services.
- Washington State will utilize a 1915(i) State Plan Amendment for provision of some or all of the b(3) services.

A formal transition team has been formed to implement the steps outlined below by April 1, 2012. This time frame is required in order to ensure adequate discussion with stakeholders and the Washington State Legislature, completion of actuarial rate adjustments, and development and implementation of revised contracts with RSNs.

Area	Task Description	Timeline
Communication Plan & Implementation Strategy	<ul style="list-style-type: none"> • Develop and implement a communication plan to disseminate information to all impacted enrollees, counties, RSNs, stakeholders, consumer and family advocates, and cross-system partners at the state and local levels 	Sept 2010 through April 2012
2011 Legislative Session	<ul style="list-style-type: none"> • Introduce related funding issues to the Governor and the Washington State Legislature during the 2011 legislative session • Identify legislative policy/direction related to the options noted above 	Sept 2010 through April 2011
Coordination with Regional Support Networks, Tribes and Provider	<ul style="list-style-type: none"> • Discuss options with RSNs and assess impact on programs and budgets • Gather input from RSNs and provider organizations on the potential options and implementation issues resulting from various 	August 2010 – April 2012

August 2010 – Internal Planning Document on b(3) Services

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Organizations	<p>options</p> <ul style="list-style-type: none"> • Provide technical assistance on implementation of b(3) services in RSNs that are not currently providing some or all of the services 	
Notification Materials	<ul style="list-style-type: none"> • Provide information to and gather input from the State Mental Health Planning Council and the Community Transformation Partnership • Issue formal notification of change to Enrollees • Review and monitor RSN notification to enrollees of referral to or provision of alternative services in accordance with individual needs • Update publication Washington Public Mental Health Benefits Booklet For People Enrolled in Medicaid (DRAFT Waiver Attachment H.I.a., page 97) to update list of services available to Medicaid enrollees. <p>Conduct press release and post information on the DBHR website</p>	August 2010 – April 2012
Federal and State Requirements	<ul style="list-style-type: none"> • Conduct review of 1915(i) option • Develop and submit as needed a 1915(b) waiver amendment based on option selected • Develop and submit as needed a 1915(i) State Plan Amendment based on option selected • Identify and amend state regulations as needed. 	Sept 2010 – February 2012
Rate Adjustment	<ul style="list-style-type: none"> • Coordinate with actuary to adjust rates for all 13 RSNs to provide the decided level of services statewide • Determine appropriate methodology for cost of service in geographic areas where some or all of the b(3) services were not being provided 	May 2011 – October 2011
Contracts, Fiscal and IT	<ul style="list-style-type: none"> • Develop and execute or amend existing RSN contracts and submit to CMS • Revise financial reporting documents as needed based on option selected and submit to CMS • Revise data dictionary and service encounter reporting instructions as needed based on option selected and submit to CMS • Revise contract monitoring tools as needed based on option selected and submit to CMS 	April 2011 – April 2012