



# Community Care Behavioral Health External Quality Review Annual Technical Report

**April 2024**

**Review Period: January 1, 2023–December 31, 2023**



**pennsylvania**

DEPARTMENT OF HUMAN SERVICES

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## Introduction

The Final Rule of the Balanced Budget Act (BBA) of 1997 requires that state agencies contract with an external quality review organization (EQRO) to conduct an annual external quality review (EQR) of the services provided by contracted Medicaid managed care organizations (MCOs).<sup>1</sup> This EQR must include an analysis and evaluation of aggregated information on quality, timeliness, and access to the health care services that an MCO furnishes to Medicaid recipients.

The Commonwealth of Pennsylvania (PA) Department of Human Services (DHS) Office of Mental Health and Substance Abuse Services (OMHSAS) contracted with IPRO as its EQRO to conduct the 2023 EQRs for HealthChoices (HC) behavioral health MCOs (BH-MCOs) and to prepare the annual technical reports. The subject of this report is one HC BH-MCO: Community Care Behavioral Health (CCBH). Subsequent references to MCO in this report refer specifically to this HC BH-MCO.

## Overview

The HC BH Program is the mandatory managed care program that provides Medical Assistance recipients with BH services in PA. The PA DHS OMHSAS determined that the county governments would be offered the right of first opportunity to enter into capitated agreements with PA for the administration of the HC BH Program. In such cases, DHS holds the HC BH Program Standards and Requirements (PS&R) Agreement with the HC BH contractors, referred to in this report as “Primary Contractors.” Primary Contractors, in turn, subcontract with a private-sector BH-MCO to manage the HC BH Program. Effective January 1, 2022, all 67 counties exercised their right of first opportunity to contract, either alone or in combination with other counties, with a BH-MCO.

In the interest of operational efficiency, numerous counties have come together to create HC oversight entities (HC-OEs) that coordinate the Primary Contractors while providing an oversight function of the BH-MCOs. In some cases, the HC-OE is the HC BH contractor, and in other cases, multiple Primary Contractors contract with an HC-OE to manage their HC BH Program. In the CCBH managed care network, Allegheny, Berks, Chester, and Erie counties hold contracts with CCBH. Behavioral Health Services of Somerset and Bedford Counties (BHSSBC) holds a contract with CCBH for Bedford and Somerset counties. Carbon, Monroe, and Pike counties (CMP) hold a contract with CCBH as the Carbon-Monroe-Pike Joinder Board. Lackawanna, Luzerne, Susquehanna, and Wyoming counties hold a contract with Northeast Behavioral Health Care Consortium (NBHCC), which, in turn, holds a contract with CCBH. Effective July 1, 2021, 23 northcentral counties (Bradford, Cameron, Centre, Clarion, Clearfield, Columbia, Elk, Forest, Huntingdon, Jefferson, Juniata, McKean, Mifflin, Montour, Northumberland, Potter, Schuylkill, Snyder, Sullivan, Tioga, Union, Warren, and Wayne) entered into a capitated agreement through a new Primary Contractor, Behavioral Health Alliance of Rural Pennsylvania, Inc. (BHARP). Through BHARP, these 23 counties maintained their contract with CCBH. Effective January 1, 2022, Greene County joined BHARP, effectively changing its contracted MCO from Beacon Health Options of Pennsylvania (BHO), since renamed Carelon Health of Pennsylvania (Carelon), to CCBH. For Blair County, the Primary Contractor is Blair HC. For Clinton and Lycoming counties, the Primary Contractor is the Lycoming-Clinton Joinder Board. For York and Adams counties, the Primary Contractor is the York-Adams HC Joinder Governing Board. On July 1, 2022, Delaware changed its contract from Magellan Behavioral Health (MBH) to CCBH. Medicaid managed care (MMC) compliance findings for any HC-OE changing MCO contracts are not included in BBA reporting for a period of three years after the change.

## Objectives

The EQR-related activities that must be included in the detailed technical reports are as follows:

- validation of performance improvement projects (PIPs),
- validation of MCO performance measures (PMs),
- review to determine plan compliance with structure and operations standards established by the state (*Title 42 Code of Federal Regulations [CFR] Section [§] 438.358*), and
- validation of MCO network adequacy.

## Scope of EQR Activities

In accordance with the updates to the Centers for Medicare & Medicaid Services (CMS) EQRO Protocols released in February 2023,<sup>2</sup> this technical report includes eight core sections:

- I. Validation of Performance Improvement Projects
- II. Validation of Performance Measures
- III. Compliance with Medicaid Managed Care Regulations
- IV. Validation of Network Adequacy
- V. Quality Studies
- VI. MCO Responses to 2022 EQR Recommendations
- VII. 2023 Strengths, Opportunities for Improvement, and Recommendations
- VIII. Summary of Activities

For the MCO, information for **Sections I** and **II** is derived from IPRO’s validation of the MCO’s PIPs and PM submissions. The PM validation, as conducted by IPRO, included a repeated measurement of three PMs: Healthcare Effectiveness Data and Information Set (HEDIS®) Follow-Up After Hospitalization for Mental Illness, PA-specific Follow-Up After Hospitalization for Mental Illness, and Readmission Within 30 Days of Inpatient Psychiatric Discharge. Until 2023, information for compliance with Medicaid Managed Care (MMC) regulations in **Section III** was derived from monitoring and reviews conducted by OMHSAS, as well as the oversight functions of the county or contracted entity, when applicable, against PA’s Program Evaluation Performance Summary (PEPS) Review Application and/or Readiness Assessment Instrument (RAI). Beginning in 2023, the PEPS standards and compliance data were migrated to the Systematic Monitoring, Access, and Retrieval Technology (SMART) application. **Section IV** discusses the validation of MCO network adequacy in relation to existing federal and state standards. **Section V** discusses the quality study for the Integrated Community Wellness Centers (ICWC) program. **Section VI** includes the MCO’s responses to opportunities for improvement noted in the 2022 (measurement year [MY] 2021) EQR annual technical report and presents the degree to which the MCO addressed each opportunity for improvement. **Section VII** includes a summary of the MCO’s strengths and opportunities for improvement for this review period (MY 2022), as determined by IPRO, as well as a “report card” of the MCO’s performance as related to the quality indicators included in the EQR evaluation for HC BH quality performance of the MCO. Lastly, **Section VIII** provides a summary of EQR activities for the MCO for this review period. Also included are the following: **References** with a list of publications cited and **Appendices** that include crosswalks of SMART standards to pertinent BBA regulations and to OMHSAS-specific SMART substandards, as well as results of the SMART review for OMHSAS-specific standards.

# I: Validation of Performance Improvement Projects

## Objectives

*Title 42 CFR § 438.330(d)* establishes that state agencies require contracted MCOs to conduct PIPs that focus on both clinical and non-clinical areas. According to the CMS, the purpose of a PIP is to assess and improve the processes and outcomes of health care provided by an MCO.

In accordance with current BBA regulations, IPRO validates at least one PIP for the MCO. The Primary Contractors and MCOs are required to implement improvement actions and to conduct follow-up, including but not limited to subsequent studies or remeasurement of previous studies in order to demonstrate improvement or the need for further action.

The name of the current PIP project is “Prevention, Early Detection, Treatment, and Recovery (PEDTAR) for Substance Use Disorders (SUD).” The Aim Statement for this PIP reads: “Significantly slow (and eventually stop) the growth of SUD prevalence among HC members while improving outcomes for those individuals with SUD, and also addressing racial and ethnic health disparities through a systematic and person-centered approach.”

The PIP has three common clinical objectives (for all MCOs) and one non-clinical population health objective:

1. Increase access to appropriate screening, referral, and treatment for members with an opioid use disorder (OUD) and/or other SUD.
2. Improve retention in treatment for members with an OUD and/or other SUD diagnosis.
3. Increase concurrent use of drug and alcohol counseling in conjunction with pharmacotherapy (medication-assisted treatment [MAT]).
4. Develop a population-based prevention strategy with a minimum of at least two activities across the MCO/HC BH contracting networks. The two “activities” may fall under a single intervention or may compose two distinct interventions. Note that while the emphasis here is on population-based strategies, this non-clinical objective should be interpreted within the PIP to potentially include interventions that target or collaborate with providers and health care systems in support of a specific population (SUD) health objective.

Additionally, OMHSAS identified the following core performance indicators for the PEDTAR PIP:

1. **Follow-Up After High-Intensity Care for Substance Use Disorder (FUI)** – This is a HEDIS measure that measures “the percentage of acute inpatient hospitalizations, residential treatment or detoxification visits for a diagnosis of substance use disorder among members 13 years of age and older that result in a follow-up visit or service for substance use disorder.”<sup>3</sup> It contains two submeasures: continuity of care within 7 days and continuity of care within 30 days of the index discharge or visit.
2. **Substance Use Disorder-Related Avoidable Readmissions (SAR)** – This is a PA-specific measure that measures avoidable readmissions for HC members 13 years of age and older discharged from detox, inpatient rehab, or residential services with an alcohol and other drug (AOD) dependence primary diagnosis. The measure requires 30 days of continuous enrollment (from the index discharge date) in the plan’s HC program. This measures discharges, not individuals (starting from Day 1 of the MY; if there are multiple qualifying discharges within any 30-day period, only the earliest discharge is counted in the denominator). The SUD avoidable readmissions submeasure is intended to complement FUI and recognizes that appropriate levels of care for individuals with SUD will depend on the particular circumstances and conditions of the individual. Therefore, for this submeasure, “avoidable readmission” will include detox episodes only.
3. **Mental Health-Related Avoidable Readmissions (MHR)** – This PA-specific measure will use the same denominator as SAR. The measure recognizes the high comorbidity rates of mental health conditions among SUD members and is designed to assess screening, detection, early intervention, and treatment for mental health conditions before they reach a critical stage. For this measure, “readmission” will be defined as any acute inpatient admission with a primary mental health diagnosis occurring within 30 days of a qualifying discharge from AOD detox, inpatient rehab, or residential services.
4. **Medication-Assisted Treatment for Opioid Use Disorder (MAT-OUD)** – This PA-specific performance indicator measures the percentage of HC BH beneficiaries with an active diagnosis of OUD in the measurement period who received both BH counseling services and pharmacotherapy for their OUD during the measurement period. This PA-

specific measure is based on a CMS measure of “the percentage of Medicaid beneficiaries ages 18–64 with an OUD who filled a prescription for or were administered or dispensed an FDA-approved medication for the disorder during the measure year.”<sup>4</sup> This measure will be adapted to include members ages 16 years and older. BH counseling is not necessarily limited to addiction counseling.

5. **Medication-Assisted Treatment for Alcohol Use Disorder (MAT-AUD)** – This PA-specific performance indicator measures the percentage of HC BH beneficiaries with an active diagnosis of moderate to severe alcohol use disorder (AUD) in the measurement period who received BH counseling services, as well as pharmacotherapy for their AUD during the measurement period. This PA-specific measure mirrors the logic of MAT-OUD, except for members ages 16 years and older with severe or moderate AUD. BH counseling is not necessarily limited to addiction counseling.

MCOs are expected to submit results to IPRO on an annual basis. In addition to running as annual measures, quarterly rates will be used to enable measurement on a frequency that will support continuous monitoring and adjustment by the MCOs and their Primary Contractors.

This PIP project will extend from January 2021 through December 2024, including a one-year extension, with initial PIP proposals submitted in 2020 and a final report due in September 2025. With this PIP cycle, all MCOs/Primary Contractors share the same baseline period and timeline.

### Technical Methods of Data Collection and Analysis

The MCOs are required by OMHSAS to submit their projects using a standardized PIP template form, which is consistent with CMS protocols. These protocols follow a longitudinal format and capture information related to:

- Project Topic
- Methodology
- Barrier Analysis, Interventions, and Monitoring
- Results
- Discussion

For the PEDTAR PIP, OMHSAS has designated the Primary Contractors to conduct quarterly PIP review meetings with each MCO. The purpose of these meetings will be to discuss ongoing monitoring of PIP activity, to discuss the status of implementing planned interventions, and to provide a forum for ongoing technical assistance, as necessary. Plans will be asked to provide up-to-date data on process measures and outcome measures prior to each meeting. Because of the level of detail provided during these meetings, rather than two semiannual submissions, MCOs will submit only one PIP interim report each September starting in 2021.

IPRO’s validation of PIP activities is consistent with the protocol issued by CMS<sup>Error! Bookmark not defined.</sup> and meets the requirements of the Final Rule on the EQR of Medicaid MCOs. IPRO’s review evaluates each project, as they are reported using an annual form, for compliance with the following eight review elements:

1. Topic Rationale
2. Aim
3. Methodology
4. Identified Study Population Barrier Analysis
5. Robust Interventions
6. Results
7. Discussion and Validity of Reported Improvement
8. Sustainability

The first seven elements relate to the baseline and demonstrable improvement phases of the project. The last element relates to sustaining improvement from the baseline measurement. The evaluation consists of the review findings being considered to determine whether the PIP results should be accepted as valid and reliable. In accordance with the EQR PIP validation protocol issued by CMS in February 2023, BH replaced the former scoring with two qualitative assessments of the PIP, expressed in terms of levels of confidence (High, Moderate, and Low or None): 1) EQRO’s Overall Confidence that the PIP Adhered to Acceptable Methodology for All Phases; and 2) EQRO’s Overall Confidence that the PIP Produced Evidence of Significant Improvement.

The results for demonstrable and sustainable improvement will be reported by the MCO and evaluated by the EQRO at the end of the current PIP cycle and reported in a subsequent EQR annual technical report.

## Findings

CCBH successfully submitted a PEDTAR PIP proposal in the fall of 2020 based on an initial baseline period of July 1, 2019, through June 30, 2020. Implementation began in early 2021. The MCO subsequently resubmitted a revised proposal based on the full calendar year (CY) 2020 data with goals, objectives, and interventions recalibrated as needed. IPRO reviewed all baseline PIP submissions for adherence to PIP design principles and standards, including alignment with the statewide PIP aims and objectives, as well as internal consistency and completeness. Clinical intervention highlights include application of the Cascade of Care model with an emphasis on warm hand-offs (WHOs) and continuity of care, telehealth to support MAT, and increased SUD screening and referrals in the primary care setting. For its population-based prevention strategy component, CCBH is developing educational MAT toolkits and an anti-stigma campaign focused on reducing SUD stigma in the racial and social justice context, highlighting cultural awareness.

CCBH's Year 2 report provided a thoroughly written account of all aspects of the PIP, with solid documentation of findings from intervention tracking measures (ITMs) to analyses, including ancillary data and information (e.g., community needs assessments) and conclusions that are well supported. Changes in ITMs for certain interventions, such as its WHO intervention, suggest that the ITMs are working as intended: to provide leading tells about progress (e.g., OUD-WHO rates were consistently higher than AUD-WHO rates in 2022, and this was also reflected in improved performance in MAT-OUD compared to MAT-AUD).

### Rating 1: EQRO's Overall Confidence that the PIP Adhered to Acceptable Methodology for All Phases

Based on review of CCBH's Year 2 report, there was high confidence that the PIP adhered to acceptable methodology for all phases of design and data collection and conducted accurate data analysis and interpretation of PIP results. There were no validation findings that indicate that the credibility of the PIP results is at risk. As relates to Rating 1, IPRO recommends the following:

- The only note of caution is some of the low response rates in some of the public health surveys, especially for the Anti-Stigma Campaign (ITM PHb.ii) in quarter 4 of 2022. If low response rates continue, CCBH will need to address the potential for bias in results going forward for these important measures related to public health strategy interventions.

### Rating 2: EQRO's Overall Confidence that the PIP Produced Evidence of Significant Improvement

There is moderate confidence that the PIP produced evidence of significant improvement. Some measures (FUI 30-day, MHR, and MAT-OUD) present a mixed picture, with improvements in some cases through Year 1 and then slowing or even reversing progress in Year 2. All other performance indicator rates (FUI 7-day, SAR, and MAT-AUD) worsened since Year 1. As relates to Rating 2, IPRO recommends the following:

- CCBH makes a somewhat strong case for expecting improvement down the line based on steady improvements in some of its ITMs, which serve as useful leading indicators. On the other hand, ITMs like 1a, 1b, and 2a suggest inconsistent or unclear results, especially with newer interventions like its Recovery Management Checklist intervention. Actualization of improvements in the sustainable improvement year of the PIP will depend on continued effort, vigilance, and a readiness to adjust if needed.



## II: Validation of Performance Measures

### Objectives

In MY 2022, OMHSAS's HC Quality Program required MCOs to run three PMs as part of their Quality Assessment and Performance Improvement (QAPI) Program: HEDIS Follow-Up After Hospitalization for Mental Illness (FUH), PA-specific FUH, and Readmission Within 30 Days of Inpatient Psychiatric Discharge (REA). Studies were remeasured in 2022. IPRO validated all three PMs reported by each MCO for MY 2022 to ensure that the PMs were implemented to specifications and state reporting requirements (*Title 42 CFR § 438.330[b][2]*).

### Follow-Up After Hospitalization for Mental Illness

This PM assessed the percentage of discharges for members 6 years of age and older who were hospitalized for treatment of selected mental health disorders, who were seen on an ambulatory basis, or who were in day/night treatment with a mental health provider on the date of discharge up to 7 and 30 days after hospital discharge. The measure continues to be of interest to OMHSAS for the purpose of comparing county, Primary Contractor, and BH-MCO rates to available national benchmarks and to prior years' rates.

For each indicator, the criteria specified to identify the eligible population were: product line, age, enrollment, anchor date, and event/diagnosis. To identify the administrative numerator positives, date of service and diagnosis/procedure code criteria were outlined, as well as other specifications as needed. Indicator rates were calculated using only the BH-MCO's data systems to identify numerator positives (i.e., administratively).

There were four separate measurements related to the FUH measure. All utilized the same denominator but had different numerators.

### Eligible Population for HEDIS Follow-Up

The entire eligible population was used for all 24 Primary Contractors participating for MY 2022. Eligible cases were defined as those members in the HC BH Program who met the following criteria:

- members who had one (or more) hospital discharges from any acute care facility with a discharge date occurring between January 1 and December 1, 2022;
- a principal International Classification of Diseases, Tenth Revision, Clinical Modification (ICD-10-CM) diagnosis code indicating one of the specified mental health disorders;
- 6 years of age and older as of the date of discharge; and
- continuously enrolled from the date of hospital discharge through 30 days after discharge, with no gaps in enrollment.

Members with multiple discharges on or before December 1, 2022, greater than 30 days apart with a principal diagnosis indicating one of the mental health disorders specified are counted more than once in the eligible population. If a readmission or direct transfer followed a discharge for one of the selected mental health disorders to an acute mental health facility within 30 days after discharge, only the subsequent discharge is counted in the denominator, as long as the subsequent discharge is on or before December 1, 2022. The methodology for identification of the eligible population for these indicators was consistent with the HEDIS MY 2022 methodology for the FUH measure.

### HEDIS Follow-Up Indicators

#### **Quality Indicator 1 (QI 1): Follow-Up After Hospitalization for Mental Illness Within 7 Days After Discharge (Calculation based on industry standard codes used in HEDIS)**

Numerator: An ambulatory visit with a mental health practitioner up to 7 days after hospital discharge with one of the qualifying industry standard ambulatory service codes. The date of service must clearly indicate a qualifying ambulatory visit with a mental health practitioner or day/night treatment with a mental health practitioner.

#### **Quality Indicator 2 (QI 2): Follow-Up After Hospitalization for Mental Illness Within 30 Days After Discharge (Calculation based on industry standard codes used in HEDIS)**

Numerator: An ambulatory visit with a mental health practitioner up to 30 days after hospital discharge with one of the qualifying industry standard ambulatory service codes. The date of service must clearly indicate a qualifying ambulatory visit with a mental health practitioner or day/night treatment with a mental health practitioner.

### ***Eligible Population for PA-Specific Follow-Up***

The entire eligible population was used for all 24 Primary Contractors participating for MY 2022. Eligible cases were defined as those members in the HC BH Program who met the following criteria:

- members who had one (or more) hospital discharges from any acute care facility with a principal diagnosis of mental illness or intentional self-harm occurring between January 1 and December 2, 2022;
- 6 years of age and older as of the date of discharge; and
- continuously enrolled from the date of hospital discharge through 30 days after discharge, with no gaps in enrollment.

Members with multiple discharges on or before December 2, 2022, greater than 30 days apart with a principal diagnosis indicating one of the mental health disorders specified are counted more than once in the eligible population. If a readmission or direct transfer followed a discharge for one of the selected mental health disorders to an acute mental health facility within 30 days after discharge, only the subsequent discharge is counted in the denominator, as long as the subsequent discharge is on or before December 2, 2022. The PA-specific measure has been adjusted to allow discharges up through December 2, 2022, which allows for the full 30-day follow-up period where same-day follow-up visits may be counted in the numerator.

### ***PA-Specific Follow-Up Indicators***

#### **Quality Indicator A (QI A): Follow-Up After Hospitalization for Mental Illness Within 7 Days After Discharge**

**Numerator:** An ambulatory visit with a mental health practitioner or peer support network on the date of discharge or up to 7 days after hospital discharge with one of the qualifying industry standards or one of the PA-specific ambulatory service codes provided. The date of service must clearly indicate a qualifying ambulatory visit with a mental health practitioner or day/night treatment with a mental health practitioner.

#### **Quality Indicator B (QI B): Follow-Up After Hospitalization for Mental Illness Within 30 Days after Discharge**

**Numerator:** An ambulatory visit with a mental health practitioner or peer support network on the date of discharge or up to 30 days after hospital discharge with one of the qualifying industry standards or one of the PA-specific ambulatory service codes provided. The date of service must clearly indicate a qualifying ambulatory visit with a mental health practitioner or day/night treatment with a mental health practitioner.

### ***Quality Indicator Significance***

There are various measures of treatment efficacy, such as service satisfaction, functional status, and health outcomes. Among them, rehospitalization rates continue to be used as a reliable indicator of the effectiveness of inpatient treatment.<sup>5</sup> Avoidable inpatient readmission is a step backward in treatment and a costly alternative to effective and efficient ambulatory care. Timely follow-up care, therefore, is an important component of comprehensive care and is an effective means to control the cost and maximize the quality of mental health services. Additionally, mental illness continues to impact the PA population, including those with substance abuse concerns or SUD.<sup>6</sup> Measuring appropriate care transitions for members with mental illness, therefore, carries wider implications for the OMHSAS quality area related to SUD prevalence and outcomes.

As noted, timely follow-up after hospitalization for mental illness has been and remains a focus for OMHSAS, and results are reviewed for potential trends each year. MY 2022 results will be examined in the context of the 2019 novel coronavirus (COVID-19) pandemic, which has been implicated in the rising prevalence of mental illness.<sup>7</sup> While factors such as those outlined in this section may persist and continue to impact follow-up rates, OMHSAS is exploring new and related areas of research, as well as the factors that may impact optimal follow-up. OMHSAS will continue to discuss the development of new or enhanced initiatives with the goal of continual improvement of care.

## Readmission Within 30 Days of Inpatient Psychiatric Discharge

In addition to the FUH measure, OMHSAS elected to retain and remeasure the REA indicator for this year's EQR. This study examined BH services provided to members participating in the HC BH Program. For the indicator, the criteria specified to identify the eligible population were product line, age, enrollment, anchor date, and event/diagnosis. In order to identify the administrative numerator-positives, the date-of-service, and diagnosis/procedure code criteria were outlined, as were other specifications as needed. This measure's calculation was based on administrative data only.

This PM assessed the percentage of discharges for enrollees from inpatient acute psychiatric care that were followed by an inpatient acute psychiatric care readmission within 30 days of the previous discharge.

### Eligible Population

The entire eligible population was used for all 67 counties and 24 Primary Contractors participating for MY 2022. Eligible cases were defined as those members in the HC BH Program who met the following criteria:

- members with one or more hospital discharges from any inpatient acute psychiatric care facility with a discharge date occurring between January 1 and December 2, 2022;
- a principal ICD-10-CM diagnosis code indicating one of the specified mental health disorders;
- enrolled on date of discharge from the first hospitalization event and on the date of admission of the second discharge event; and
- the claim was clearly identified as a discharge.

The numerator comprised members who were readmitted to inpatient acute psychiatric care within 30 days of the previous inpatient psychiatric discharge.

### Technical Methods of Data Collection and Analysis

The source for all information was administrative data provided to IPRO by the BH-MCOs. The source for all administrative data was the BH-MCOs' transactional claims systems. Each BH-MCO was also required to submit the follow-up rates calculated for the four indicators, along with their data files for validation purposes. The BH-MCOs were given the opportunity to resubmit, as necessary.

### Performance Goals

HEDIS percentiles for the 7-day and 30-day FUH All Ages indicators have been adopted as the benchmarks for determining the requirement for a root cause analysis (RCA) and corresponding quality improvement plan (QIP) for each underperforming indicator. Rates for the HEDIS FUH 7-day and 30-day indicators that fall below the 75th percentile for each of these respective indicators will result in a request to the BH-MCO for an RCA and QIP. Similarly, REA rates that are greater than the state's goal of 11.75% result in an RCA and QIP assignment. For this measure, lower rates indicate better performance. This process is further discussed in **Section VI**.

## Data Analysis

The quality indicators were defined as rates, based on a numerator of qualifying events or members and a denominator of qualifying events or members, defined according to the specifications of the measure. The HC aggregate (statewide) for each indicator was the total numerator divided by the total denominator, which represented the rate derived for the statewide population of denominator-qualifying events or members. Year-to-year comparisons to MY 2021 rates were provided where applicable. Additionally, as appropriate, disparate rates were calculated for various categories in the current study. To compare rates, a Z-test statistic for comparing proportions for two independent samples was used. To calculate the test statistic, the two proportions were averaged (“pooled”) through the following formula:

$$\hat{p} = \frac{N1 + N2}{D1 + D2}$$

Where:

$N1$  = current year numerator,

$N2$  = prior year numerator,

$D1$  = current year denominator, and

$D2$  = prior year denominator.

The single proportion estimate was then used for estimating the standard error (SE). The Z-test statistic was obtained by dividing the difference between the proportions by the standard error of the difference. Analysis that uses the Z-test assumes that the data and their test statistics approximate a normal distribution. To correct for approximation error, the Yates correction for continuity was applied:

$$z - statistic = \frac{ABS(p1 - p2) - 0.5(\frac{1}{D1} + \frac{1}{D2})}{\sqrt{\hat{p}(1 - \hat{p})[\frac{1}{D1} + \frac{1}{D2}]}}$$

Where:

$p1$  = current year quality indicator rate, and

$p2$  = prior year quality indicator rate.

Two-tailed statistical significance tests were conducted at  $p = 0.05$  to test the null hypothesis of:

$$H_0: p1 = p2$$

Percentage-point difference (PPD) and 95% confidence intervals (CIs) for the difference between the two proportions were also calculated. CIs were not calculated if denominators of rates contained fewer than 100 members.

## Limitations

The tables and figures in this section present rates, CIs, and tests of statistical significance for Primary Contractors. Due to differences in 7-day versus 30-day quality indicators, scales in figures may vary. Caution should be exercised when interpreting results for small denominators. A denominator of 100 or greater is preferred for drawing conclusions from Z-tests of the PM results. In addition, this analysis assumes that the proportions being compared come from independent samples. To the extent that this is not the case, the findings should be interpreted with caution.

## Conclusions and Comparative Findings

The HEDIS follow-up indicators are presented for three age groups: ages 18–64 years, ages 6+ years, and ages 6–17 years. The 6+ years (“All Ages”) age group results are presented to show the follow-up rates for the overall HEDIS population, and the 6–17 years age group results are presented to support the Children's Health Insurance Program Reauthorization Act (CHIPRA) reporting requirements. The results for the PA-specific follow-up indicators are presented for ages 6+ years only.

The results are presented at the BH-MCO and Primary Contractor levels. The BH-MCO-specific rates were calculated using the numerator and denominator for that particular BH-MCO (and Primary Contractor with the same contracted BH-MCO). The Primary Contractor-specific rates were calculated using the numerators and denominators for that particular Primary Contractor. For each of these rates, the 95% CI is reported. The HC BH aggregate (statewide) rates were also calculated for the indicators.

BH-MCO-specific rates were compared to the HC BH statewide rates to determine if they were statistically significantly above or below that value. Statistically significant BH-MCO differences are noted. Primary Contractor-specific rates were also compared to the HC BH statewide rates to determine if they were statistically significantly above or below that value. Statistically significant Primary Contractor-specific differences are noted.

The HEDIS follow-up results for the All Ages and the 18–64 years age groups are compared to the HEDIS 2023 (MY 2022) national percentiles to show BH-MCO and Primary Contractor progress with meeting the OMHSAS goal of follow-up rates at or above the 75th percentile. The HEDIS follow-up results for the 6–17 years age group are not compared to HEDIS benchmarks.

## I: HEDIS Follow-Up Indicators

### a) Age Group: Ages 18–64 Years

Table 2.1 shows the MY 2022 results for both the HEDIS 7-day and 30-day follow-up measures for members ages 18–64 years compared to MY 2021.

Table 2.1: MY 2022 HEDIS FUH 7-Day and 30-Day Follow-Up Indicators (Ages 18–64 Years)

Measure <sup>1</sup>	MY 2022 (N)	MY 2022 (D)	MY 2022 %	MY 2022 95% CI Lower	MY 2022 95% CI Upper	MY 2021 %	MY 2022 Rate Comparison to MY 2021 PPD	MY 2022 Rate Comparison to MY 2021 SSD	MY 2022 Rate Comparison to MY 2022 HEDIS Medicaid Percentiles
<b>Q1 1 – HEDIS 7-Day Follow-Up (Ages 18–64 Years)</b>									
Statewide	8965	27548	<b>32.5%</b>	32.0%	33.1%	34.3%	-1.7	Yes	Below 75th percentile, above 50th percentile
CCBH	3785	10356	<b>36.5%</b>	35.6%	37.5%	40.1%	-3.6	Yes	Below 75th percentile, above 50th percentile
Allegheny	687	1794	<b>38.3%</b>	36.0%	40.6%	40.9%	-2.6	No	Below 75th percentile, above 50th percentile
Bedford-Somerset	73	214	<b>34.1%</b>	27.5%	40.7%	44.7%	-10.6	Yes	Below 75th percentile, above 50th percentile
Berks	273	798	<b>34.2%</b>	30.9%	37.6%	41.4%	-7.1	Yes	Below 75th percentile, above 50th percentile
BH Alliance of Rural PA	1068	2662	<b>40.1%</b>	38.2%	42.0%	40.7%	-0.6	No	Below 75th percentile, above 50th percentile
Blair	182	408	<b>44.6%</b>	39.7%	49.6%	41.8%	2.8	No	At or above 75th percentile
Chester	124	379	<b>32.7%</b>	27.9%	37.6%	37.7%	-5.0	No	Below 75th percentile, above 50th percentile
CMP	122	328	<b>37.2%</b>	31.8%	42.6%	39.5%	-2.3	No	Below 75th percentile, above 50th percentile
Delaware	74	419	<b>17.7%</b>	13.9%	21.4%	-	-	-	Below 25th percentile
Erie	250	661	<b>37.8%</b>	34.0%	41.6%	36.0%	1.8	No	Below 75th percentile, above 50th percentile
Lycoming-Clinton	121	327	<b>37.0%</b>	31.6%	42.4%	36.1%	0.9	No	Below 75th percentile, above 50th percentile
NBHCC	506	1379	<b>36.7%</b>	34.1%	39.3%	42.3%	-5.6	Yes	Below 75th percentile, above 50th percentile
York-Adams	305	987	<b>30.9%</b>	28.0%	33.8%	37.3%	-6.4	Yes	Below 50th percentile, above 25th percentile
<b>Q1 2 – HEDIS 30-Day Follow-Up (Ages 18–64 Years)</b>									
Statewide	14322	27548	<b>52.0%</b>	51.4%	52.6%	53.7%	-1.7	Yes	Below 50th percentile, above 25th percentile
CCBH	6000	10356	<b>57.9%</b>	57.0%	58.9%	60.3%	-2.3	Yes	Below 75th percentile, above 50th percentile
Allegheny	1095	1794	<b>61.0%</b>	58.8%	63.3%	60.3%	0.7	No	Below 75th percentile, above 50th percentile
Bedford-Somerset	131	214	<b>61.2%</b>	54.5%	68.0%	64.8%	-3.6	No	Below 75th percentile, above 50th percentile
Berks	412	798	<b>51.6%</b>	48.1%	55.2%	56.1%	-4.5	No	Below 50th percentile, above 25th percentile
BH Alliance of Rural PA	1669	2662	<b>62.7%</b>	60.8%	64.6%	62.7%	0.0	No	At or above 75th percentile
Blair	269	408	<b>65.9%</b>	61.2%	70.7%	65.5%	0.5	No	At or above 75th percentile
Chester	185	379	<b>48.8%</b>	43.6%	54.0%	53.3%	-4.5	No	Below 50th percentile, above 25th percentile
CMP	200	328	<b>61.0%</b>	55.5%	66.4%	63.0%	-2.0	No	Below 75th percentile, above 50th percentile
Delaware	139	419	<b>33.2%</b>	28.5%	37.8%	-	-	-	Below 25th percentile

Measure <sup>1</sup>	MY 2022 (N)	MY 2022 (D)	MY 2022 %	MY 2022 95% CI Lower	MY 2022 95% CI Upper	MY 2021 %	MY 2022 Rate Comparison to MY 2021 PPD	MY 2022 Rate Comparison to MY 2021 SSD	MY 2022 Rate Comparison to MY 2022 HEDIS Medicaid Percentiles
Erie	352	661	<b>53.3%</b>	49.4%	57.1%	53.6%	-0.3	No	Below 50th percentile, above 25th percentile
Lycoming-Clinton	183	327	<b>56.0%</b>	50.4%	61.5%	60.4%	-4.4	No	Below 75th percentile, above 50th percentile
NBHCC	819	1379	<b>59.4%</b>	56.8%	62.0%	61.8%	-2.4	No	Below 75th percentile, above 50th percentile
York-Adams	546	987	<b>55.3%</b>	52.2%	58.5%	60.4%	-5.1	Yes	Below 75th percentile, above 50th percentile

<sup>1</sup> Due to rounding, a PPD value may slightly diverge from the difference between the MY 2022 and MY 2021 rates.

MY: measurement year; FUH: Follow-Up After Hospitalization for Mental Illness; HEDIS: Healthcare Effectiveness Data and Information Set; CI: confidence interval; N: numerator; D: denominator; PPD: percentage-point difference; SSD: statistically significant difference; QI: quality indicator; CCBH: Community Care Behavioral Health; CMP: Carbon-Monroe-Pike Joinder Board; NBHCC: Northeast Behavioral Health Care Consortium.

**Figure 2.1** is a graphical representation of MY 2022 HEDIS FUH 7-day and 30-day follow-up rates in the ages 18–64 years population for CCBH and its associated Primary Contractors. The orange line represents the MCO average.

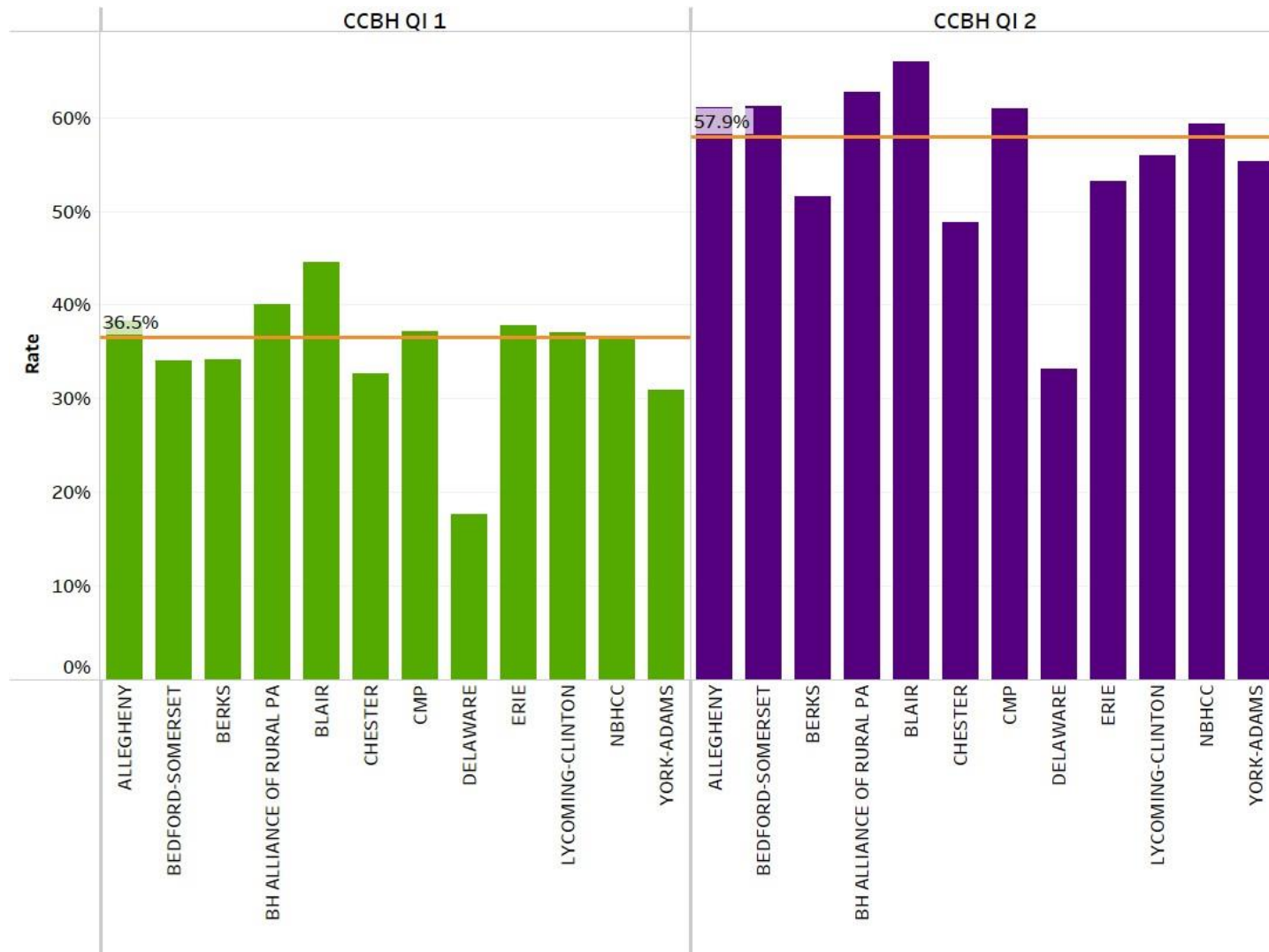
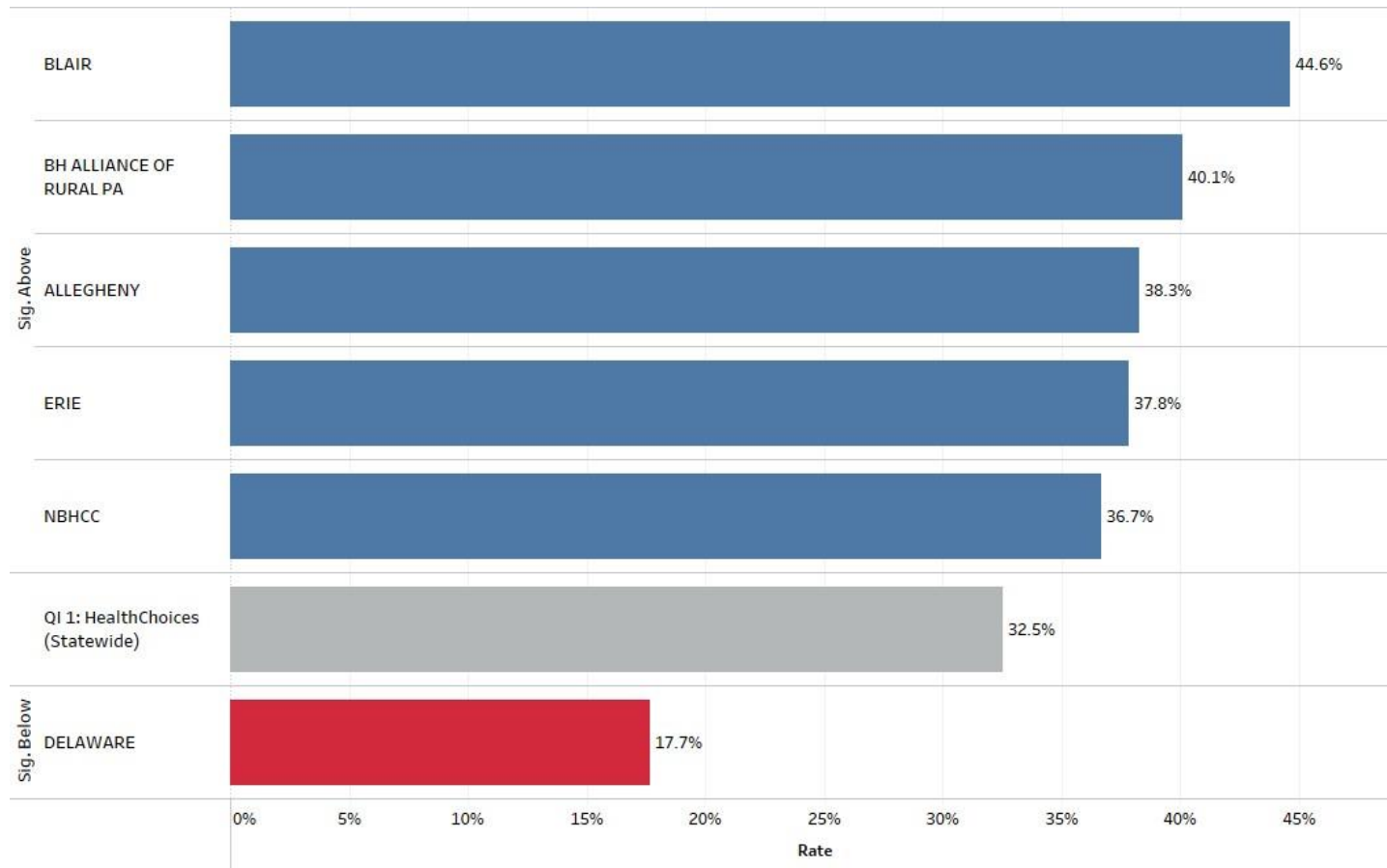


Figure 2.1: MY 2022 HEDIS FUH 7-Day and 30-Day Follow-Up Rates (Ages 18–64 Years)



**Figure 2.2** shows the HC BH (statewide) rates for this age cohort and the individual Primary Contractor rates that were statistically significantly higher (blue) or lower (red) than the statewide rate.



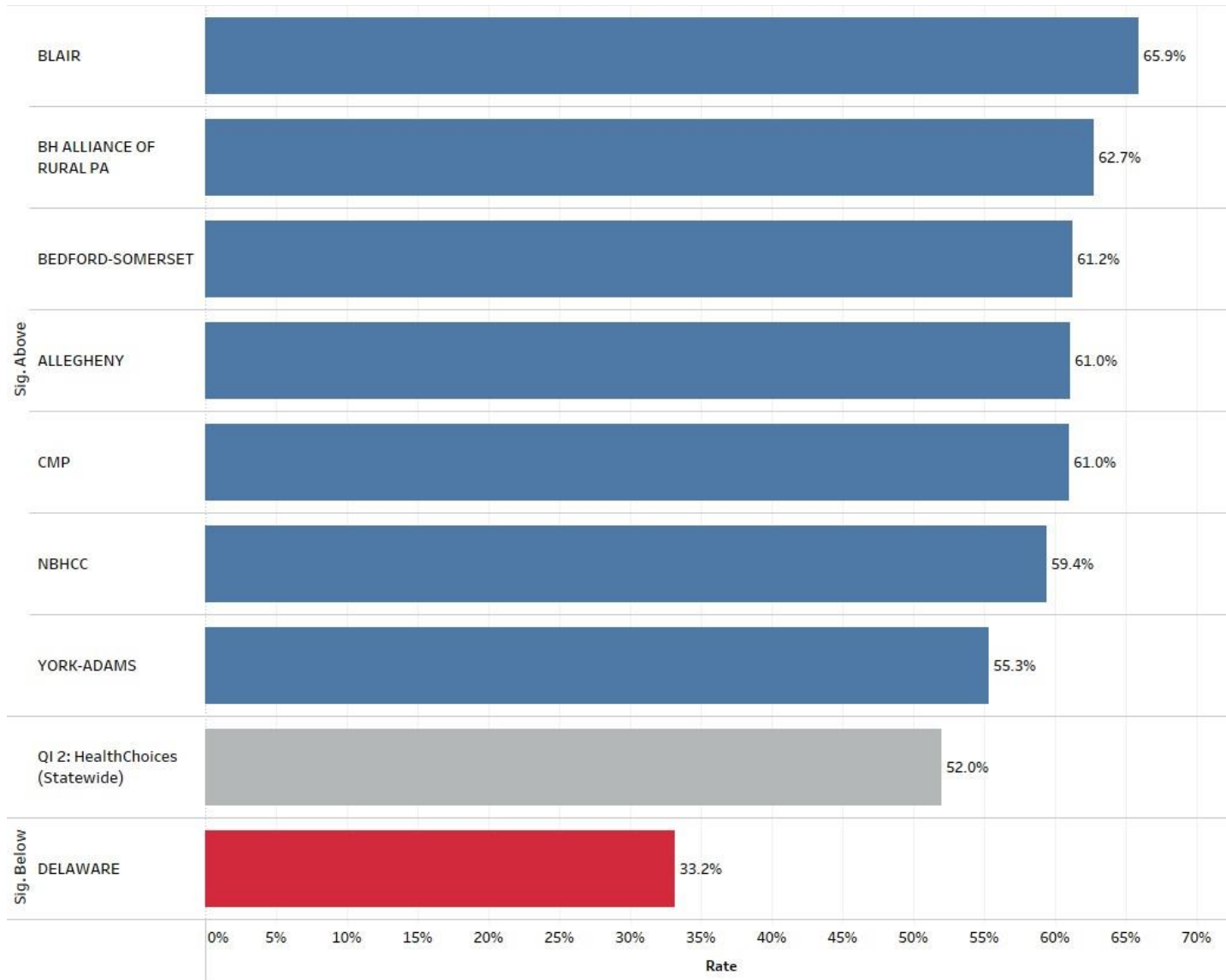


Figure 2.2: SSDs in CCBH Contractor MY 2022 HEDIS FUH Rates (Ages 18–64 Years) CCBH Primary Contractor MY 2022 HEDIS FUH rates for 18–64 years of age that are statistically significantly different than statewide rates.

**b) Overall Population: Ages 6+ Years**

Table 2.2 shows the MY 2022 aggregate results for both the HEDIS 7-day and 30-day follow-up measures compared to MY 2021.

Table 2.2: MY 2022 HEDIS FUH 7-Day and 30-Day Follow-Up Indicators (All Ages)

Measure <sup>1</sup>	MY 2022 (N)	MY 2022 (D)	MY 2022 %	MY 2022 95% CI Lower	MY 2022 95% CI Upper	MY 2021 %	MY 2022 Rate Comparison to MY 2021 PPD	MY 2022 Rate Comparison to MY 2021 SSD	MY 2022 Rate Comparison to MY 2022 HEDIS Medicaid Percentiles
<b>Q1 1 – HEDIS 7-Day Follow-Up (All Ages)</b>									
Statewide	13025	35443	<b>36.7%</b>	36.2%	37.3%	37.7%	-1.0	Yes	Below 75th percentile, above 50th percentile
CCBH	5505	13563	<b>40.6%</b>	39.8%	41.4%	43.3%	-2.7	Yes	Below 75th percentile, above 50th percentile
Allegheny	955	2316	<b>41.2%</b>	39.2%	43.3%	42.3%	-1.1	No	Below 75th percentile, above 50th percentile
Bedford-Somerset	106	287	<b>36.9%</b>	31.2%	42.7%	47.8%	-10.8	Yes	Below 50th percentile, above 25th percentile
Berks	387	1010	<b>38.3%</b>	35.3%	41.4%	44.2%	-5.9	Yes	Below 75th percentile, above 50th percentile
BH Alliance of Rural PA	1619	3622	<b>44.7%</b>	43.1%	46.3%	44.2%	0.5	No	Below 75th percentile, above 50th percentile
Blair	210	465	<b>45.2%</b>	40.5%	49.8%	44.5%	0.7	No	Below 75th percentile, above 50th percentile
Chester	194	525	<b>37.0%</b>	32.7%	41.2%	40.9%	-4.0	No	Below 50th percentile, above 25th percentile
CMP	204	481	<b>42.4%</b>	37.9%	46.9%	42.4%	-0.0	No	Below 75th percentile, above 50th percentile
Delaware	121	525	<b>23.0%</b>	19.3%	26.7%	-	-	-	Below 25th percentile
Erie	363	865	<b>42.0%</b>	38.6%	45.3%	41.6%	0.4	No	Below 75th percentile, above 50th percentile
Lycoming-Clinton	156	412	<b>37.9%</b>	33.1%	42.7%	38.3%	-0.4	No	Below 50th percentile, above 25th percentile
NBHCC	728	1738	<b>41.9%</b>	39.5%	44.2%	45.6%	-3.7	Yes	Below 75th percentile, above 50th percentile
York-Adams	462	1317	<b>35.1%</b>	32.5%	37.7%	42.7%	-7.6	Yes	Below 50th percentile, above 25th percentile
<b>Q1 2 – HEDIS 30-Day Follow-Up (All Ages)</b>									
Statewide	20002	35443	<b>56.4%</b>	55.9%	57.0%	57.9%	-1.4	Yes	Below 50th percentile, above 25th percentile
CCBH	8437	13563	<b>62.2%</b>	61.4%	63.0%	64.0%	-1.8	Yes	Below 75th percentile, above 50th percentile
Allegheny	1467	2316	<b>63.3%</b>	61.4%	65.3%	63.2%	0.1	No	Below 75th percentile, above 50th percentile
Bedford-Somerset	184	287	<b>64.1%</b>	58.4%	69.8%	68.2%	-4.1	No	Below 75th percentile, above 50th percentile
Berks	562	1010	<b>55.6%</b>	52.5%	58.8%	60.4%	-4.8	Yes	Below 50th percentile, above 25th percentile
BH Alliance of Rural PA	2456	3622	<b>67.8%</b>	66.3%	69.3%	66.4%	1.4	No	At or above 75th percentile
Blair	317	465	<b>68.2%</b>	63.8%	72.5%	68.4%	-0.2	No	At or above 75th percentile
Chester	271	525	<b>51.6%</b>	47.2%	56.0%	56.3%	-4.7	No	Below 50th percentile, above 25th percentile
CMP	323	481	<b>67.2%</b>	62.9%	71.5%	66.9%	0.2	No	At or above 75th percentile
Delaware	203	525	<b>38.7%</b>	34.4%	42.9%	-	-	-	Below 25th percentile

Measure <sup>1</sup>	MY 2022 (N)	MY 2022 (D)	MY 2022 %	MY 2022 95% CI Lower	MY 2022 95% CI Upper	MY 2021 %	MY 2022 Rate Comparison to MY 2021 PPD	MY 2022 Rate Comparison to MY 2021 SSD	MY 2022 Rate Comparison to MY 2022 HEDIS Medicaid Percentiles
Erie	510	865	<b>59.0%</b>	55.6%	62.3%	60.1%	-1.2	No	Below 50th percentile, above 25th percentile
Lycoming-Clinton	242	412	<b>58.7%</b>	53.9%	63.6%	63.7%	-4.9	No	Below 50th percentile, above 25th percentile
NBHCC	1115	1738	<b>64.2%</b>	61.9%	66.4%	65.0%	-0.8	No	Below 75th percentile, above 50th percentile
York-Adams	787	1317	<b>59.8%</b>	57.1%	62.4%	65.4%	-5.6	Yes	Below 75th percentile, above 50th percentile

<sup>1</sup> Due to rounding, a PPD value may slightly diverge from the difference between the MY 2022 and MY 2021 rates.

MY: measurement year; HEDIS: Healthcare Effectiveness Data and Information Set; FUH: Follow-Up After Hospitalization for Mental Illness; CI: confidence interval; N: numerator; D: denominator; PPD: percentage-point difference; SSD: statistically significant difference; QI: quality indicator; CCBH: Community Care Behavioral Health; CMP: Carbon-Monroe-Pike Joinder Board; NBHCC: Northeast Behavioral Health Care Consortium.

**Figure 2.3** is a graphical representation of the MY 2022 HEDIS FUH follow-up rates for CCBH and its associated Primary Contractors. The orange line represents the MCO average.

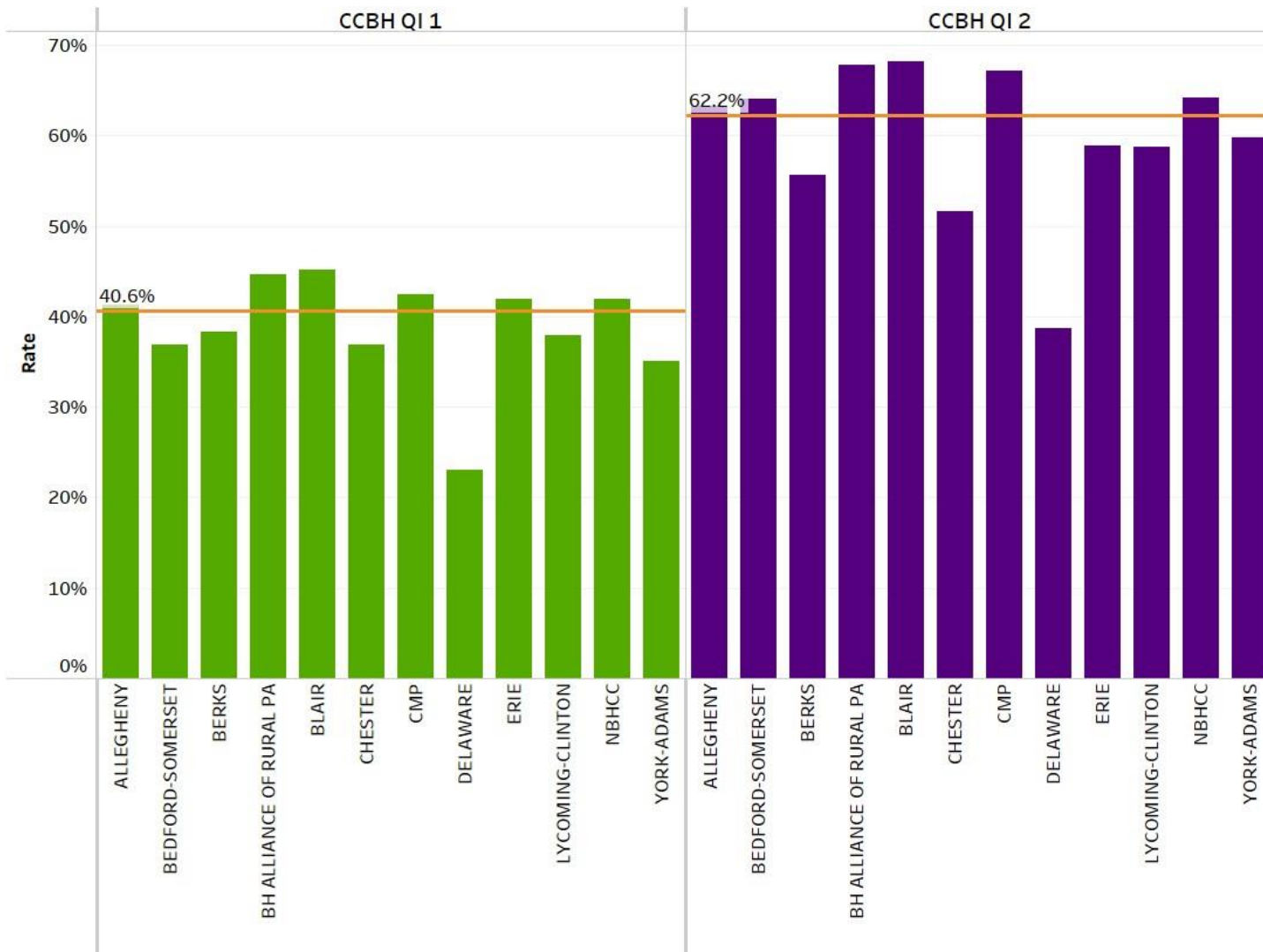
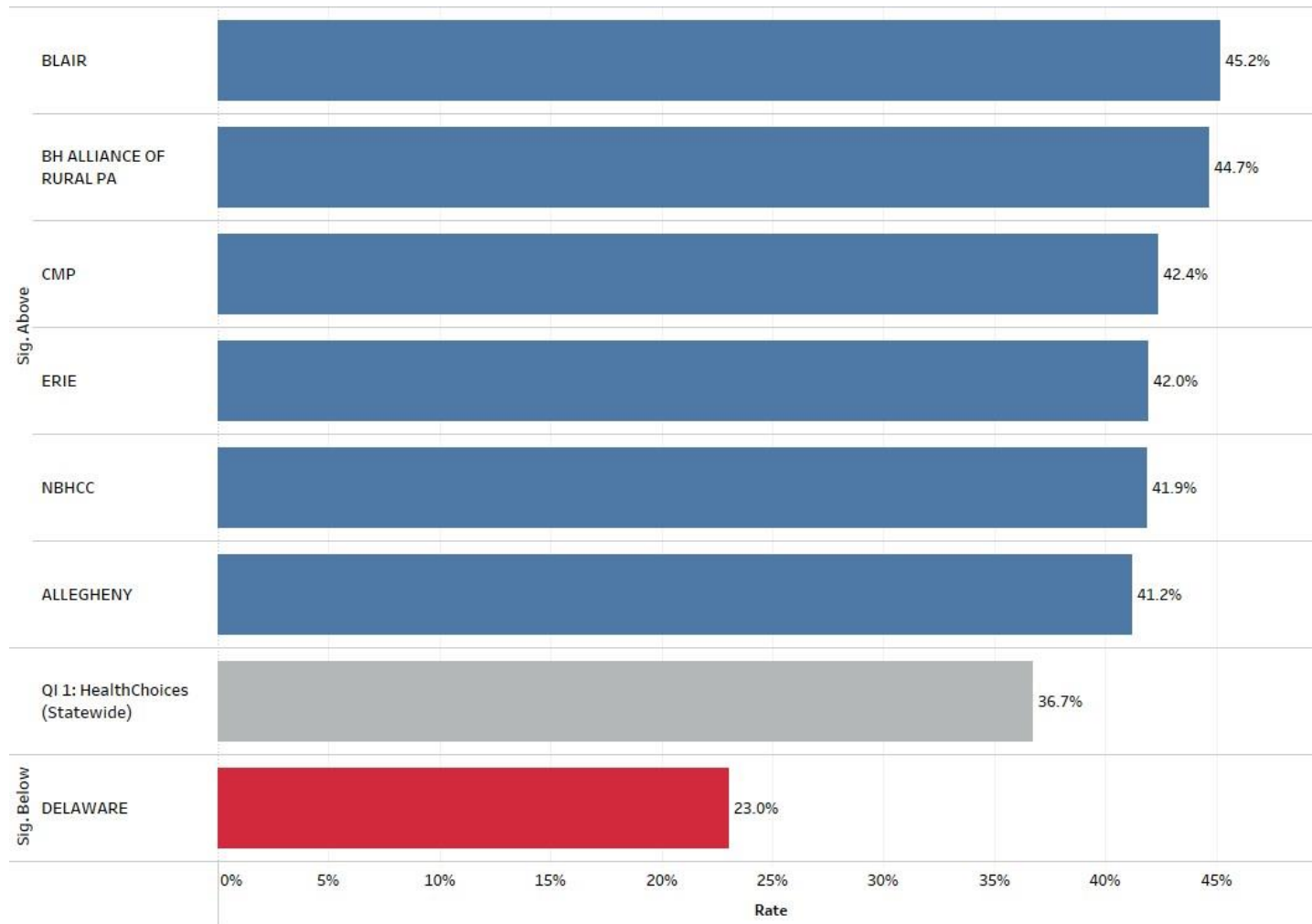


Figure 2.3: MY 2022 HEDIS FUH 7-Day and 30-Day Follow-Up Rates (All Ages)

**Figure 2.4** shows the HC BH (statewide) rates and the individual Primary Contractor rates that were statistically significantly higher (blue) or lower (red) than the statewide rate.



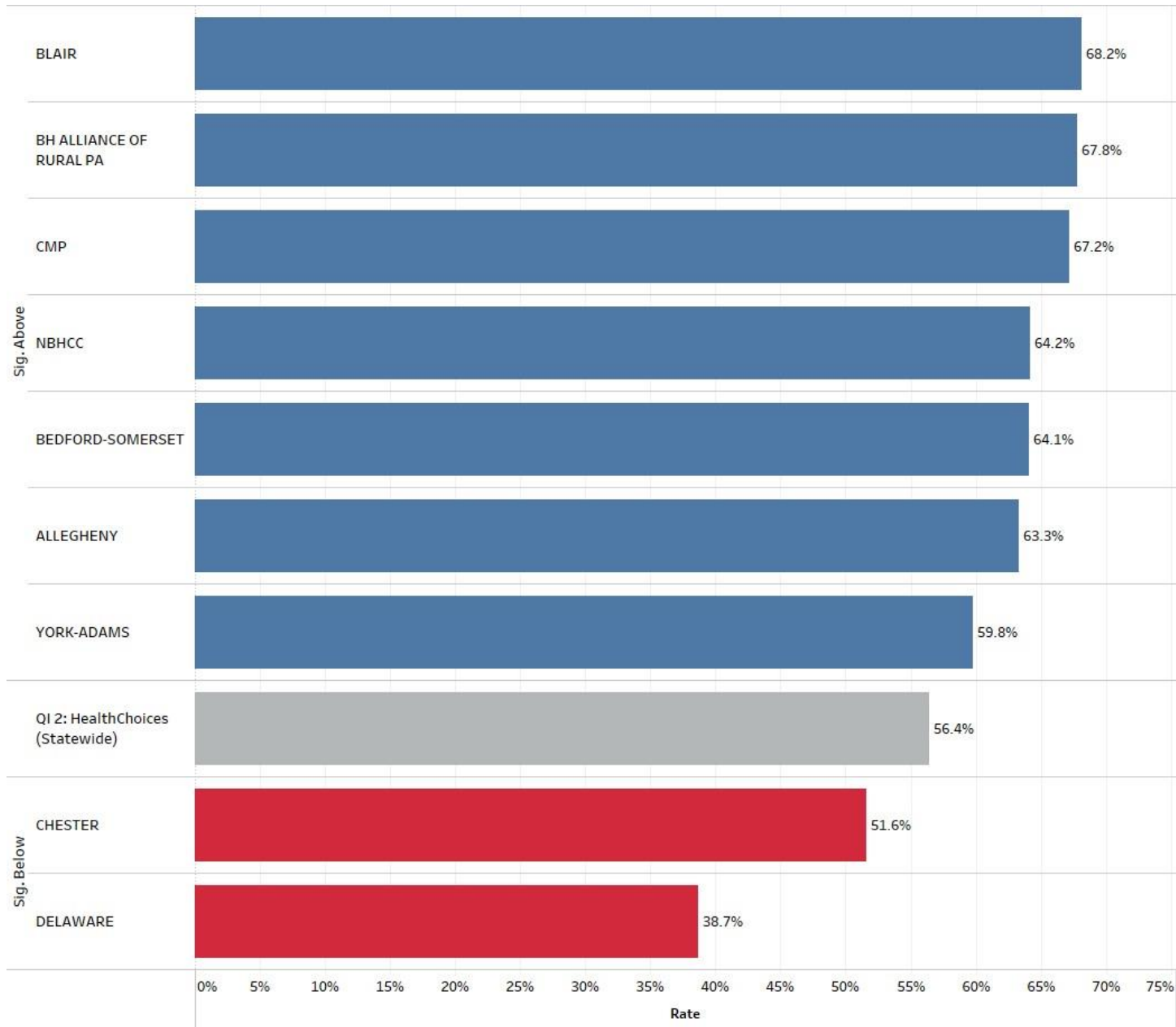


Figure 2.4: SSDs in CCBH Contractor MY 2022 HEDIS FUH Rates (All Ages) CCBH Primary Contractor MY 2022 HEDIS FUH rates for all ages that are statistically significantly different than statewide rates.

**c) Age Group: Ages 6–17 Years**

Table 2.3 shows the MY 2022 results for both the HEDIS FUH 7-day and 30-day follow-up measures for members ages 6–17 years compared to MY 2021.

Table 2.3: MY 2022 HEDIS FUH 7-Day and 30-Day Follow-Up Indicators (Ages 6–17 Years)

Measure <sup>1</sup>	MY 2022 (N)	MY 2022 (D)	MY 2022 %	MY 2022 95% CI Lower	MY 2022 95% CI Upper	MY 2021 %	MY 2022 Rate Comparison to MY 2021 PPD	MY 2022 Rate Comparison to MY 2021 SSD
<b>Q1 1 – HEDIS 7-Day Follow-Up (Ages 6–17 Years)</b>								
Statewide	3881	7144	<b>54.3%</b>	53.2%	55.5%	52.3%	2.0	Yes
CCBH	1650	2956	<b>55.8%</b>	54.0%	57.6%	56.4%	-0.6	No
Allegheny	242	445	<b>54.4%</b>	49.6%	59.1%	51.0%	3.4	No
Bedford-Somerset	32	68	<b>47.1%</b>	N/A	N/A	56.7%	-9.6	N/A
Berks	106	189	<b>56.1%</b>	48.7%	63.4%	61.1%	-5.0	No
BH Alliance of Rural PA	542	915	<b>59.2%</b>	56.0%	62.5%	56.8%	2.5	No
Blair	26	54	<b>48.1%</b>	N/A	N/A	60.3%	-12.1	N/A
Chester	66	133	<b>49.6%</b>	40.8%	58.5%	52.6%	-3.0	No
CMP	80	142	<b>56.3%</b>	47.8%	64.8%	53.1%	3.2	No
Delaware	47	99	<b>47.5%</b>	N/A	N/A	-	-	-
Erie	107	181	<b>59.1%</b>	51.7%	66.6%	60.2%	-1.1	No
Lycoming-Clinton	32	77	<b>41.6%</b>	N/A	N/A	45.6%	-4.1	N/A
NBHCC	214	334	<b>64.1%</b>	58.8%	69.4%	61.9%	2.2	No
York-Adams	156	319	<b>48.9%</b>	43.3%	54.5%	59.9%	-11.0	Yes
<b>Q1 2 – HEDIS 30-Day Follow-Up (Ages 6–17 Years)</b>								
Statewide	5406	7144	<b>75.7%</b>	74.7%	76.7%	75.9%	-0.2	No
CCBH	2319	2956	<b>78.5%</b>	77.0%	79.9%	79.5%	-1.0	No
Allegheny	334	445	<b>75.1%</b>	70.9%	79.2%	78.1%	-3.1	No
Bedford-Somerset	51	68	<b>75.0%</b>	N/A	N/A	80.0%	-5.0	N/A
Berks	140	189	<b>74.1%</b>	67.6%	80.6%	82.3%	-8.2	No
BH Alliance of Rural PA	766	915	<b>83.7%</b>	81.3%	86.2%	80.1%	3.6	No
Blair	45	54	<b>83.3%</b>	N/A	N/A	87.7%	-4.3	N/A
Chester	81	133	<b>60.9%</b>	52.2%	69.6%	68.4%	-7.5	No
CMP	119	142	<b>83.8%</b>	77.4%	90.2%	81.7%	2.1	No
Delaware	62	99	<b>62.6%</b>	N/A	N/A	-	-	-
Erie	145	181	<b>80.1%</b>	74.0%	86.2%	81.9%	-1.8	No



Measure <sup>1</sup>	MY 2022 (N)	MY 2022 (D)	MY 2022 %	MY 2022 95% CI Lower	MY 2022 95% CI Upper	MY 2021 %	MY 2022 Rate Comparison to MY 2021 PPD	MY 2022 Rate Comparison to MY 2021 SSD
Lycoming-Clinton	56	77	<b>72.7%</b>	N/A	N/A	73.7%	-1.0	N/A
NBHCC	282	334	<b>84.4%</b>	80.4%	88.5%	80.6%	3.8	No
York-Adams	238	319	<b>74.6%</b>	69.7%	79.5%	81.1%	-6.5	No

<sup>1</sup>Due to rounding, a PPD value may slightly diverge from the difference between the MY 2022 and MY 2021 rates.

MY: measurement year; HEDIS: Healthcare Effectiveness Data and Information Set; FUH: Follow-Up After Hospitalization for Mental Illness; CI: confidence interval; N: numerator; D: denominator; PPD: percentage-point difference; SSD: statistically significant difference; QI: quality indicator; CCBH: Community Care Behavioral Health; CMP: Carbon-Monroe-Pike Joinder Board; NBHCC: Northeast Behavioral Health Care Consortium; N/A: not applicable, confidence intervals were not calculated if denominators of rates contained fewer than 100 members.

**Figure 2.5** is a graphical representation of the MY 2022 HEDIS FUH 7-day and 30-Day follow-up rates in the ages 6–17 years population for CCBH and its associated Primary Contractors. The orange line represents the MCO average.

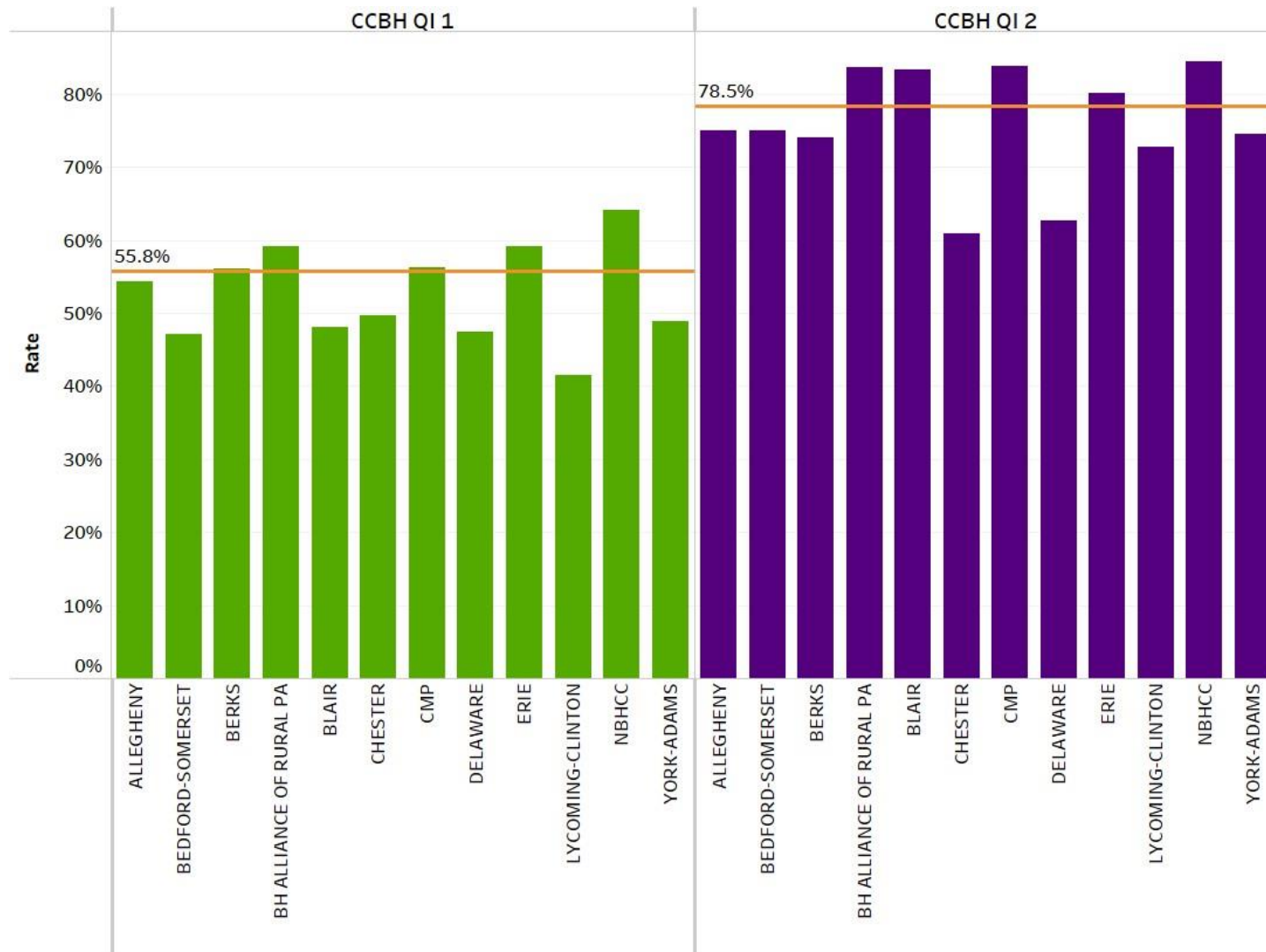
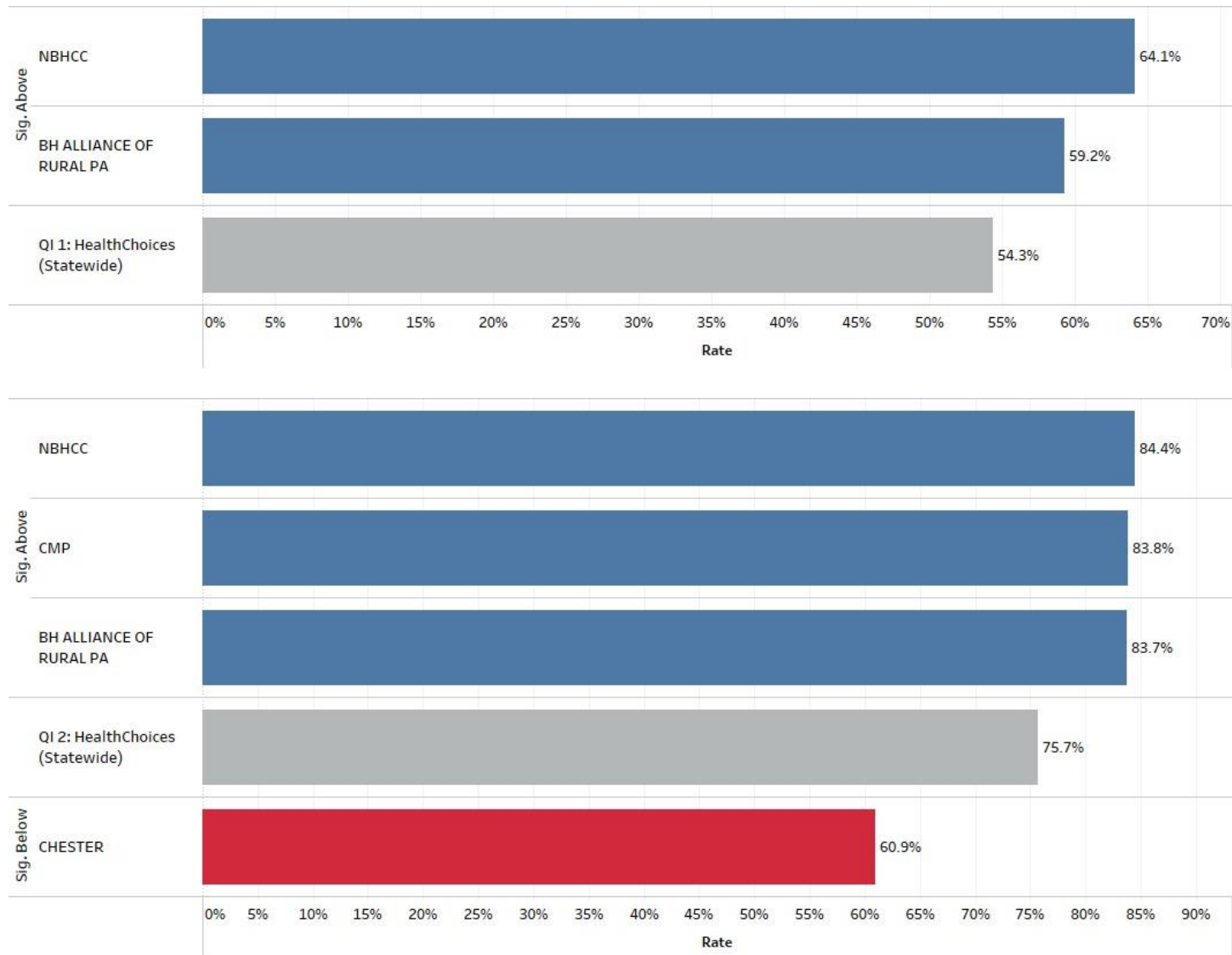


Figure 2.5: MY 2022 HEDIS FUH 7-Day and 30-Day Follow-Up Rates (Ages 6–17 Years)

**Figure 2.6** shows the HC BH (statewide) rates for this age cohort and the individual Primary Contractor rates that were statistically significantly higher (blue) or lower (red) than the statewide rates.



**Figure 2.6: SDDs in CCBH Contractor MY 2022 HEDIS FUH Rates (Ages 6–17 Years) CCBH Primary Contractor MY 2022 HEDIS FUH rates for 6–17 years of age that are statistically significantly different than statewide rates.**

## II: PA-Specific Follow-Up Indicators

### a) Overall Population: Ages 6+ Years

Table 2.4 shows the MY 2022 PA-specific FUH 7-day and 30-day follow-up indicators for all ages compared to MY 2021.

Table 2.4: MY 2022 PA-Specific FUH 7-Day and 30-Day Follow-Up Indicators (All Ages)

Measure <sup>1</sup>	MY 2022 (N)	MY 2022 (D)	MY 2022 %	MY 2022 95% CI Lower	MY 2022 95% CI Upper	MY 2021 %	MY 2022 Rate Comparison to MY 2021 PPD	MY 2022 Rate Comparison to MY 2021 SSD
<b>QI A – PA-Specific 7-Day Follow-Up (All Ages)</b>								
Statewide	15210	34916	<b>43.6%</b>	43.0%	44.1%	48.8%	-5.3	Yes
CCBH	6518	13893	<b>46.9%</b>	46.1%	47.7%	53.6%	-6.7	Yes
Allegheny	1266	2486	<b>50.9%</b>	48.9%	52.9%	54.3%	-3.3	Yes
Bedford-Somerset	132	280	<b>47.1%</b>	41.1%	53.2%	59.6%	-12.4	Yes
Berks	527	1091	<b>48.3%</b>	45.3%	51.3%	55.1%	-6.8	Yes
BH Alliance of Rural PA	1910	3761	<b>50.8%</b>	49.2%	52.4%	54.4%	-3.6	Yes
Blair	240	469	<b>51.2%</b>	46.5%	55.8%	58.3%	-7.1	Yes
Chester	217	568	<b>38.2%</b>	34.1%	42.3%	46.7%	-8.5	Yes
CMP	240	571	<b>42.0%</b>	37.9%	46.2%	47.5%	-5.5	No
Delaware	148	572	<b>25.9%</b>	22.2%	29.6%	-	-	-
Erie	426	801	<b>53.2%</b>	49.7%	56.7%	55.0%	-1.8	No
Lycoming-Clinton	167	356	<b>46.9%</b>	41.6%	52.2%	51.6%	-4.7	No
NBHCC	839	1888	<b>44.4%</b>	42.2%	46.7%	54.8%	-10.4	Yes
York-Adams	406	1050	<b>38.7%</b>	35.7%	41.7%	51.4%	-12.7	Yes
<b>QI B – PA-Specific 30-Day Follow-Up (All Ages)</b>								
Statewide	21363	34916	<b>61.2%</b>	60.7%	61.7%	65.9%	-4.7	Yes
CCBH	9085	13893	<b>65.4%</b>	64.6%	66.2%	70.7%	-5.3	Yes
Allegheny	1729	2486	<b>69.5%</b>	67.7%	71.4%	71.5%	-1.9	No
Bedford-Somerset	199	280	<b>71.1%</b>	65.6%	76.6%	78.0%	-6.9	No
Berks	686	1091	<b>62.9%</b>	60.0%	65.8%	69.6%	-6.8	Yes
BH Alliance of Rural PA	2636	3761	<b>70.1%</b>	68.6%	71.6%	72.3%	-2.2	Yes
Blair	326	469	<b>69.5%</b>	65.2%	73.8%	75.4%	-5.9	Yes
Chester	295	568	<b>51.9%</b>	47.7%	56.1%	60.0%	-8.1	Yes
CMP	357	571	<b>62.5%</b>	58.5%	66.6%	70.4%	-7.8	Yes
Delaware	216	572	<b>37.8%</b>	33.7%	41.8%	-	-	-
Erie	526	801	<b>65.7%</b>	62.3%	69.0%	68.6%	-3.0	No

Measure <sup>1</sup>	MY 2022 (N)	MY 2022 (D)	MY 2022 %	MY 2022 95% CI Lower	MY 2022 95% CI Upper	MY 2021 %	MY 2022 Rate Comparison to MY 2021 PPD	MY 2022 Rate Comparison to MY 2021 SSD
Lycoming-Clinton	247	356	<b>69.4%</b>	64.5%	74.3%	71.9%	-2.5	No
NBHCC	1215	1888	<b>64.4%</b>	62.2%	66.5%	70.2%	-5.9	Yes
York-Adams	653	1050	<b>62.2%</b>	59.2%	65.2%	71.9%	-9.7	Yes

<sup>1</sup>Due to rounding, a PPD value may slightly diverge from the difference between the MY 2022 and MY 2021 rates.

MY: measurement year; FUH: Follow-Up After Hospitalization for Mental Illness; CI: confidence interval; N: numerator; D: denominator; PPD: percentage-point difference; SSD: statistically significant difference; QI: quality indicator; CCBH: Community Care Behavioral Health; CMP: Carbon-Monroe-Pike Joinder Board; NBHCC: Northeast Behavioral Health Care Consortium.

**Figure 2.7** is a graphical representation of the MY 2022 PA-specific follow-up rates for CCBH and its associated Primary Contractors. The orange line represents the MCO average.

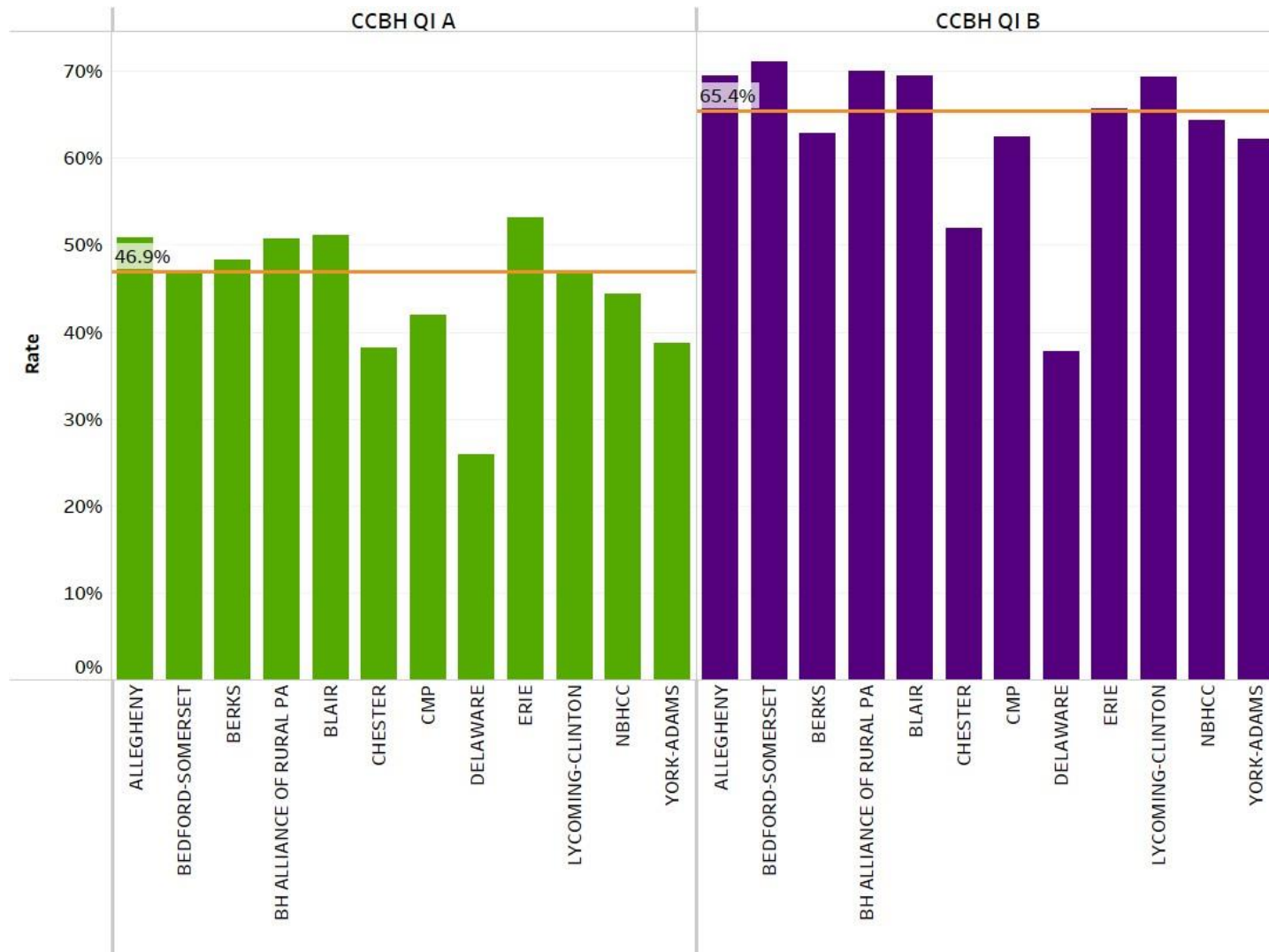
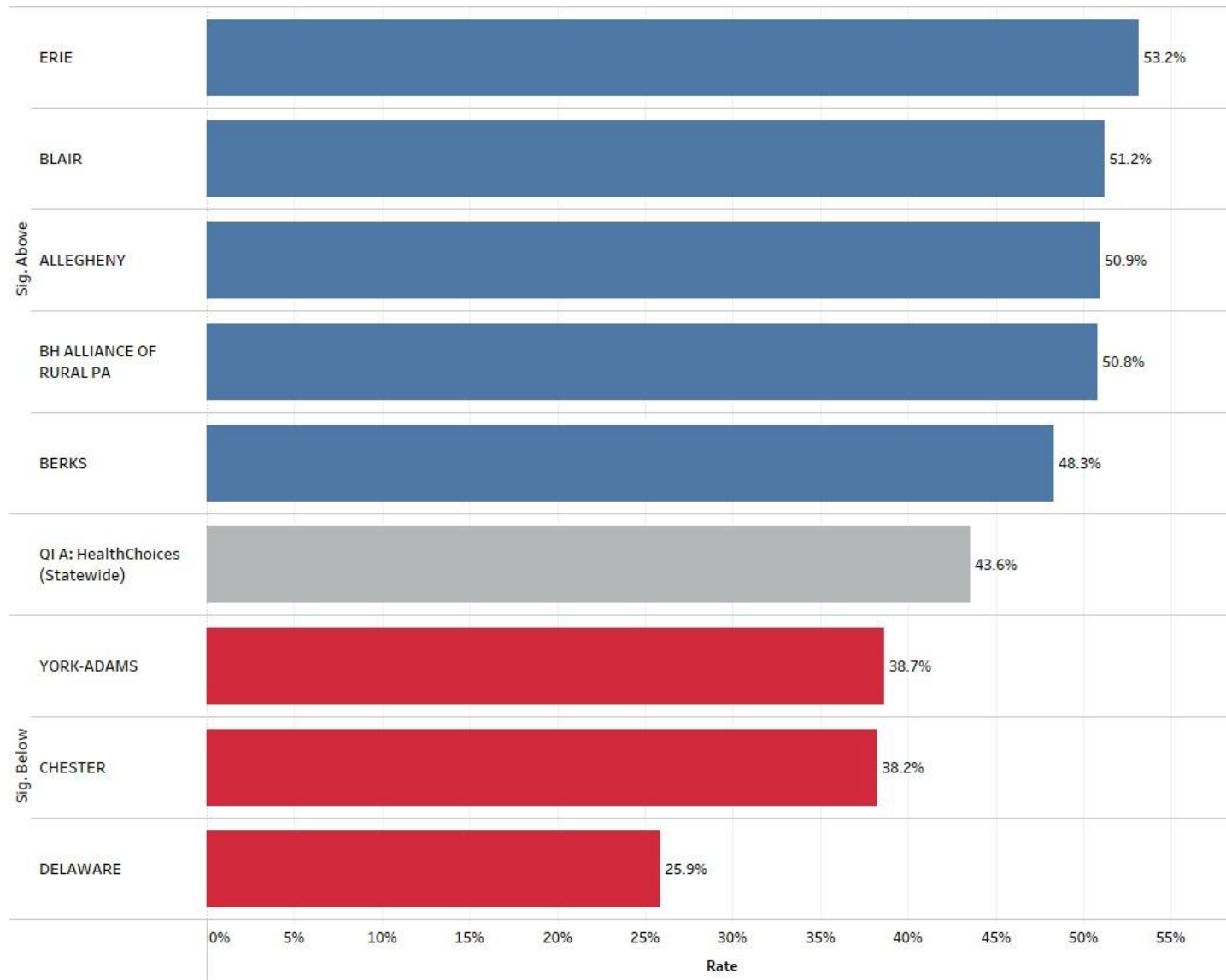


Figure 2.7: MY 2022 PA-Specific FUH 7-Day and 30-Day Follow-Up Rates (All Ages)

**Figure 2.8** shows the HC BH (statewide) rates and the individual Primary Contractor rates that were statistically significantly higher (blue) or lower (red) than the statewide rate.



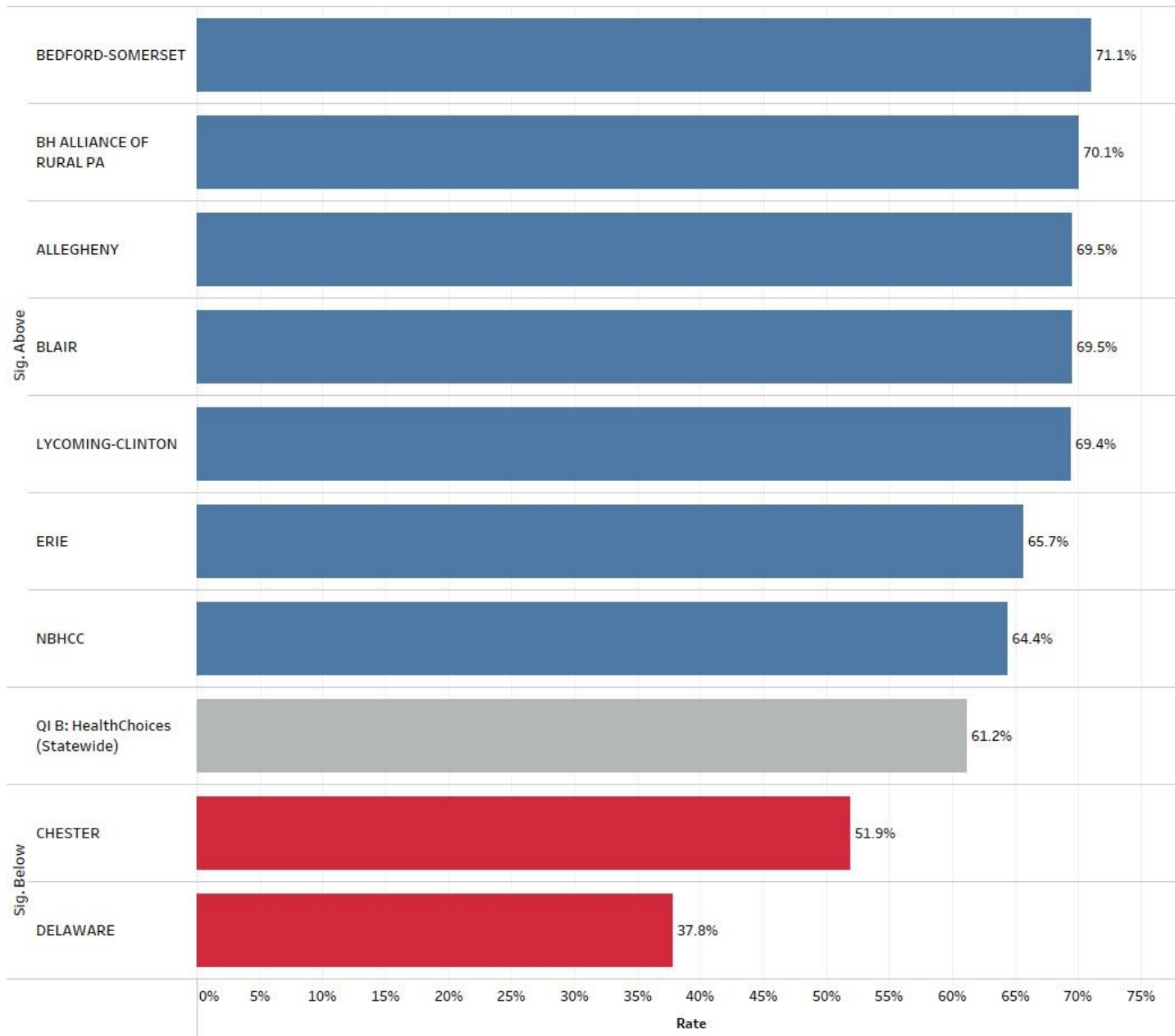


Figure 2.8: SSDs in CCBH Contractor MY 2022 PA-Specific FUH Rates (All Ages) CCBH Primary Contractor MY 2022 PA-specific FUH rates for all ages that are statistically significantly different than statewide rates.



### III: Readmission Indicators

The results are presented at the BH-MCO and then Primary Contractor level. Year-to-year comparisons of MY 2022 to MY 2021 data are provided. Additionally, as appropriate, disparate rates were calculated for various categories. The significance of the difference between two independent proportions was determined by calculating the Z score. Statistically significant difference (SSD) at the 0.05 level between groups is noted, as well as the PPD between the rates.

Individual rates were also compared to the categorical average. Rates statistically significantly above or below the average are indicated.

Lastly, aggregate rates were compared to the OMHSAS-designated PM goal of 11.75%. Individual BH-MCO and Primary Contractor rates are *not* required to be statistically significantly below 11.75% in order to meet the PM goal (Table 2.5).

Table 2.5: MY 2022 REA Readmission Indicators (All Ages)

Measure <sup>1,2</sup>	MY 2022 (N)	MY 2022 (D)	MY 2022 %	MY 2022 95% CI Lower	MY 2022 95% CI Upper	MY 2021 %	MY 2022 Rate Comparison to MY 2021 PPD	MY 2022 Rate Comparison to MY 2021 SSD
Inpatient Readmission								
Statewide	5821	44420	<b>13.1%</b>	12.8%	13.4%	13.2%	-0.1	No
CCBH	2323	18655	<b>12.5%</b>	12.0%	12.9%	12.4%	0.1	No
Allegheny	400	3509	<b>11.4%</b>	10.3%	12.5%	12.0%	-0.6	No
Bedford-Somerset	25	326	<b>7.7%</b>	4.6%	10.7%	8.3%	-0.6	No
Berks	213	1583	<b>13.5%</b>	11.7%	15.2%	13.7%	-0.3	No
BH Alliance of Rural PA	514	4421	<b>11.6%</b>	10.7%	12.6%	11.1%	0.5	No
Blair	51	548	<b>9.3%</b>	6.8%	11.8%	12.6%	-3.3	No
Chester	118	998	<b>11.8%</b>	9.8%	13.9%	14.0%	-2.2	No
CMP	139	993	<b>14.0%</b>	11.8%	16.2%	11.7%	2.3	No
Delaware	106	675	<b>15.7%</b>	12.9%	18.5%	-	-	-
Erie	140	1180	<b>11.9%</b>	10.0%	13.8%	13.4%	-1.6	No
Lycoming-Clinton	62	504	<b>12.3%</b>	9.3%	15.3%	9.0%	3.3	No
NBHCC	330	2257	<b>14.6%</b>	13.1%	16.1%	12.8%	1.8	No
York-Adams	225	1661	<b>13.5%</b>	11.9%	15.2%	14.4%	-0.9	No

<sup>1</sup> The OMHSAS-designated PM goal is a readmission rate at or below 11.75%.

<sup>2</sup> Due to rounding, a PPD value may slightly diverge from the difference between the MY 2022 and MY 2021 rates.

MY: measurement year; REA: Readmission Within 30 Days of Inpatient Psychiatric Discharge; CI: confidence interval; N: numerator; D: denominator; PPD: percentage-point difference; SSD: statistically significant difference; HC: HealthChoices; BH: behavioral health; CCBH: Community Care Behavioral Health; CMP: Carbon-Monroe-Pike Joinder Board; NBHCC: Northeast Behavioral Health Care Consortium.

**Figure 2.9** is a graphical representation of the MY 2022 readmission rates for CCBH and its associated Primary Contractors. The orange line represents the MCO average.

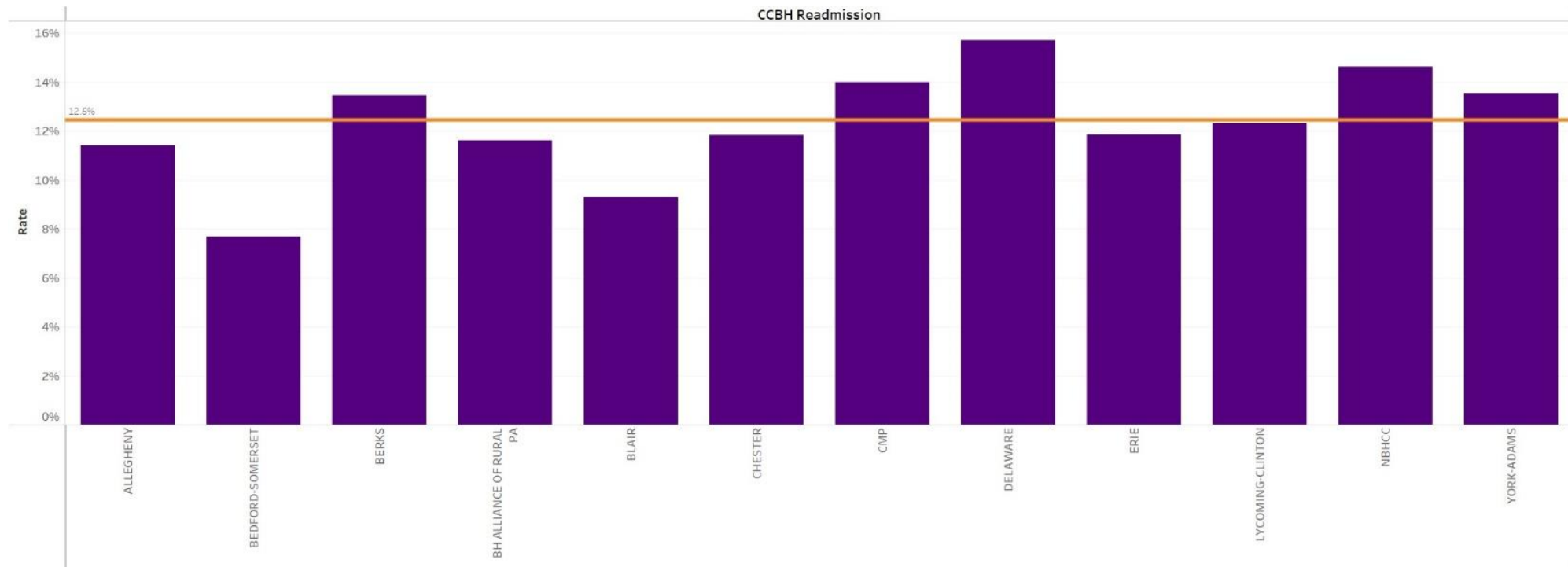


Figure 2.9: MY 2022 REA Rates for CCBH Primary Contractors (All Ages)

**Figure 2.10** shows the HC BH (statewide) readmission rate and the individual CCBH Primary Contractors that performed statistically significantly higher (red) or lower (blue) than the statewide rate.

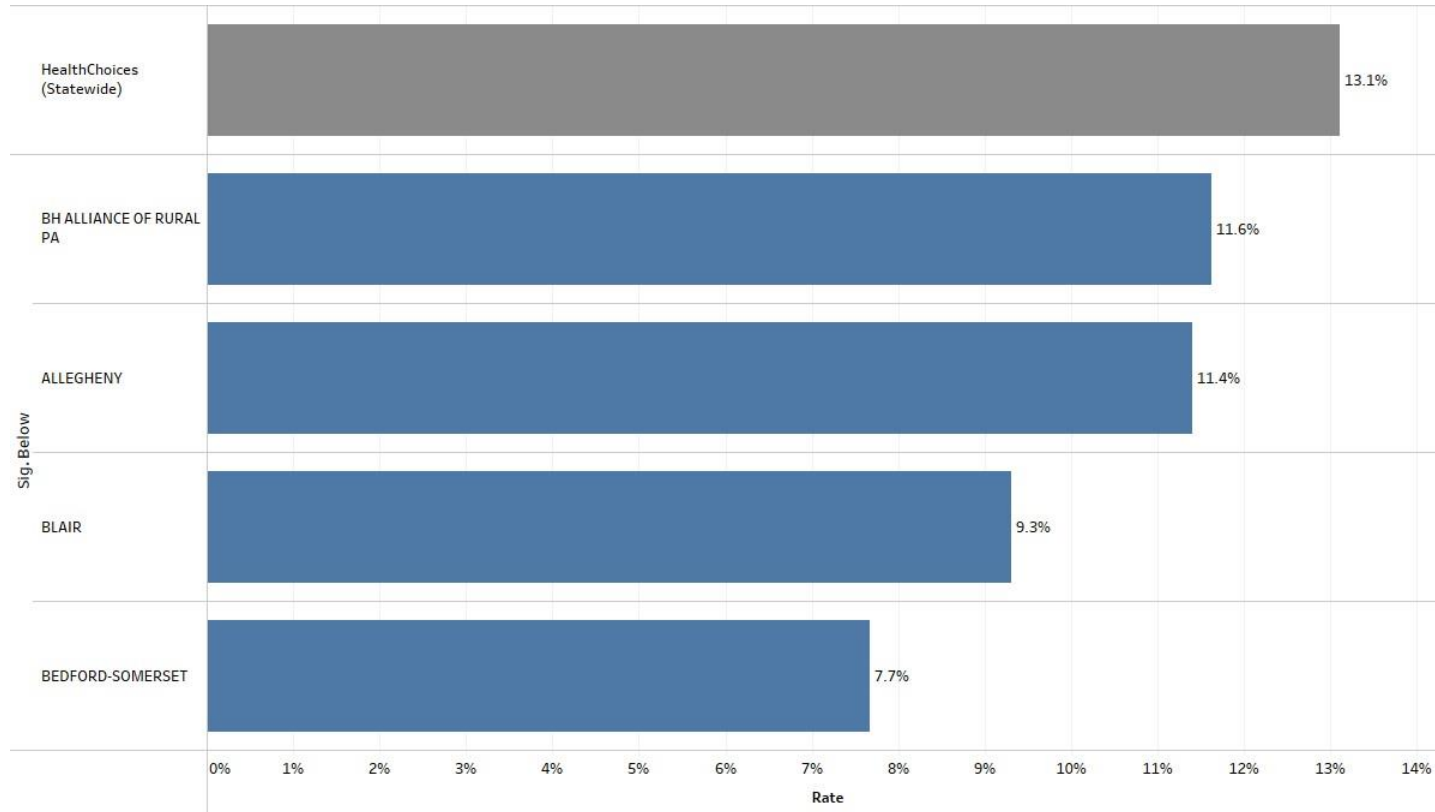


Figure 2.10: SSDs in CCBH Primary Contractor MY 2022 REA Rates (All Ages) CCBH Primary Contractor MY 2022 REA rates for all ages that are statistically significantly different than statewide rates.

## Recommendations

In MY 2022, FUH rates continued their decline for most of CCBH's Primary Contractors for most of the age cohorts measured. CCBH's decline was statistically significant for the HEDIS FUH ages 18–64 years and overall (all ages) categories but not for children ages 6–17 years. CCBH's PA-specific FUH similarly fell, and the decline was seen across all its Primary Contractors that could be measured (Delaware started its contract in July 2022).

Efforts should continue to be made to improve FUH performance, particularly for those BH-MCOs that performed below the HC BH statewide rate. The following are recommendations that are informed by the MY 2022 review:

- The purpose of this remeasurement study is to inform OMHSAS, the Primary Contractors, and the BH-MCOs of the effectiveness of the interventions implemented between 2013 and 2022, which included actions taken as part of the previous PIP cycle, to promote continuous quality improvement with regard to timely follow-up care after psychiatric hospitalization. The information contained in this study should be used to further develop strategies for improving the likelihood that at-risk members will receive follow-up care. BH-MCOs are expected to demonstrate meaningful improvement in BH follow-up rates in the next few years as a result of their interventions. To that end, CCBH and its Primary Contractors should look to some of its more successful Primary Contractors like BHARP, Blair, and Erie counties for insights on how to improve follow-up rates. Analysis may need to be measure- and even age-specific, as results suggest Primary Contractors perform relatively better or worse depending on the age cohort and whether the FUH measure is HEDIS versus PA-specific.
- It is essential to ensure that improvements are consistent, sustained across MYs, and applicable to all groups. As previously noted, although not enumerated in this report, further stratified comparisons such as Medicaid Expansion versus non-Medicaid Expansion were carried out in a separate 2023 (MY 2022) FUH Rates Report produced by the EQRO and made available to BH-MCOs in an interactive Tableau® workbook. Based in part on this resource, CCBH found ethnic and racial disparities in FUH rates; perhaps most notably, Black/African American members had on average lower rates than White members. But CCBH's and its Primary Contractors' comprehensive approach to data collection and analysis extends well beyond this resource and indeed serves as a model for other MCOs. In 2022, CCBH reports that care managers conducted over 4,300 FUH admission interviews with members, along with almost 3,000 aftercare outreach interviews that focused on understanding the drivers to psychiatric admission and, for those members not following up after discharge, why they did not follow up even when appointments were made. For the majority of admissions (55%), social determinants of health (SDoH) were identified as drivers. Particularly for members with multiple conditions, SDoH factors can have a significant impact on follow-up care. Interviews with facilities and care managers also suggest that staffing shortages are exacerbating existing discharge planning gaps, particularly around medication management, complicating follow-up care for members. In summary, CCBH has done exemplary work carrying out RCAs of barriers to follow-up after hospitalization for mental illness. They have combined this analysis with ongoing monitoring and Tableau dashboarding of their own to identify different barriers and trends by various stratifications of interest. For example, they report that racial disparities may be linked to cultural issues such as stigma, while transportation appears to be a larger concern in rural as opposed to urban areas. What is apparent is that a host of factors contribute to lower FUH rates. IPRO commends CCBH's multi-pronged approach and encourages CCBH to continue with the interventions it has identified in its HEDIS FUH QIPs. CCBH rates have declined in recent years, but the quality of the plans suggests recalibration as opposed to overhauling existing interventions, particularly as the new and newly expanded data and information become available.
- Given the complex scope and limited resources, a next step for CCBH and its Primary Contractors to consider is to identify the largest cohorts (however they are defined) of qualifying FUH discharges and focus on those factors that appear to be the biggest drivers of follow-up rates for those cohorts.

Readmission rates also worsened (increased) in MY 2022, but the change was not statistically significant. Four of CCBH's Primary Contractors were statistically significantly below (better than) the statewide REA average, including stand-outs Bedford-Somerset and Blair, both of which were well under the statewide benchmark of 11.75%. CCBH's readmission rate after psychiatric discharge for the MMC population generally remains above 11.75%, the statewide maximum goal. As a result, many recommendations previously proposed remain pertinent. Additionally, OMHSAS continues to examine strategies that may facilitate improvement in this area. In consideration of preliminary work conducted and the past PIP cycle, the recommendations may assist in future discussions.

Continued efforts should be made to improve performance with regard to REA, particularly for those BH-MCOs and Primary Contractors that did not meet the performance goal and/or performed below the HC BH statewide rate. In response to the 2022 study, the following are recommendations for improving (reducing) readmission rates after psychiatric discharge:

- The information contained within this study should be used to further develop strategies for decreasing the likelihood that at-risk members will be readmitted. In 2020, the BH-MCOs concluded a PIP that focused on improving transitions to ambulatory care from inpatient psychiatric services. A PIP starting in 2021 builds on the previous PIP by, among other things, including a performance indicator that measures mental health-related readmissions within 30 days of a discharge for SUD. BH-MCOs are expected to bring about meaningful improvement in BH readmission rates for this subpopulation with comorbid BH conditions and for their HC BH members more generally. To that end, the Primary Contractors and BH-MCOs participating in this study should identify interventions that are effective at reducing BH readmissions. The Primary Contractors and BH-MCOs should continue to conduct additional root cause and barrier analyses to identify further impediments to successful transition to ambulatory care after an acute inpatient psychiatric discharge and then implement action and monitoring plans to further decrease their rates of readmission.
- CCBH's comprehensive RCA of its REA underperformance identified a host of factors driving readmissions. As mentioned, in admissions interviews conducted in 2022, the majority of interviewees (55%) cited SDOH, or lack thereof, as an important factor contributing to their admission. Interviews with inpatient psychiatric facilities and CCBH care managers also point to provider staff shortages, burnout, and turnover, particularly in the wake of the COVID-19 pandemic, as critical causes of poor discharge planning and follow-through. IPRO agrees with CCBH's assessment and proposed interventions in its REA quality improvement plan, which center on expanding timely access to appropriate treatment that addresses the whole person. This includes training and supporting care management in motivational interviewing as part of its admissions and aftercare outreach interviews with members, as preliminary results from CCBH suggest that members engaging in these interviews have lower readmission rates. As with efforts to improve FUH rates, the expanded data and information should serve CCBH well in adjusting, discontinuing, and/or replacing interventions as results warrant. Critical to this will be a judicious application, based on logic models of change, of the appropriate timelines to assess before making changes.

### III: Compliance with Medicaid Managed Care Regulations

#### Objectives

This section of the EQR report presents a review by IPRO of the BH-MCO’s compliance with the MMC structure and operations standards. In review year (RY) 2022, 67 PA counties participated in this compliance evaluation.

Operational reviews are completed for each HC-OE. The Primary Contractor, whether contracting with an OE arrangement or not, is responsible for their regulatory compliance with federal and state regulations and the HC BH PS&R Agreement. The HC BH PS&R Agreement includes the Primary Contractor’s responsibility for the oversight of the BH-MCO’s compliance.

In the CCBH managed care network, Allegheny, Berks, Chester, and Erie counties hold contracts with CCBH. BHSSBC holds a contract with CCBH for Bedford and Somerset counties. Carbon, Monroe, and Pike counties hold a contract with CCBH as the Carbon-Monroe-Pike Joinder Board. Lackawanna, Luzerne, Susquehanna, and Wyoming counties hold a contract with NBHCC, which, in turn, holds a contract with CCBH. Effective July 1, 2021, 23 northcentral counties (Bradford, Cameron, Centre, Clarion, Clearfield, Columbia, Elk, Forest, Huntingdon, Jefferson, Juniata, McKean, Mifflin, Montour, Northumberland, Potter, Schuylkill, Snyder, Sullivan, Tioga, Union, Warren, and Wayne) entered into a capitated agreement through a new Primary Contractor, BHARP. Through BHARP, these 23 counties maintained their contract with CCBH. Effective January 1, 2022, Greene County joined BHARP, effectively changing its contracted MCO from BHO to CCBH. For Blair County, the Primary Contractor is Blair HC. For Clinton and Lycoming counties, the Primary Contractor is the Lycoming-Clinton Joinder Board. For York and Adams Counties, the Primary Contractor is the York-Adams HC Joinder Governing Board. On July 1, 2022, Delaware changed its contract from MBH to CCBH. MMC compliance findings for any HC-OE changing MCO contracts are not included in BBA reporting for a period of three years after the change. **Table 3.1** shows the name of the HC-OE, the associated HC Primary Contractor(s), and the county/counties encompassed by each Primary Contractor.

Table 3.1: CCBH HealthChoices Oversight Entities, Primary Contractors, and Counties

HealthChoices Oversight Entity	Primary Contractor	County
Allegheny County	Allegheny County	Allegheny County
Berks County	Berks County	Berks County
Behavioral Health Services of Somerset and Bedford Counties	Behavioral Health Services of Somerset and Bedford Counties (otherwise known as Bedford-Somerset for review)	Bedford County Somerset County
Central Pennsylvania Behavioral Health Collaborative (DBA Blair HealthChoices)	Blair HealthChoices	Blair County
Carbon-Monroe-Pike Joinder Board	Carbon-Monroe-Pike Joinder Board	Carbon County Monroe County Pike County
Chester County	Chester County	Chester County
Delaware County	Delaware County	Delaware County
Erie County	Erie County	Erie County
Lycoming-Clinton Joinder Board	Lycoming-Clinton Joinder Board	Clinton County Lycoming County
Northeast Behavioral Health Care Consortium	Northeast Behavioral Health Care Consortium	Lackawanna County Luzerne County Susquehanna County Wyoming County

HealthChoices Oversight Entity	Primary Contractor	County
Behavioral Health Alliance of Rural Pennsylvania	Behavioral Health Alliance of Rural Pennsylvania	Bradford County
		Cameron County
		Centre County
		Clarion County
		Clearfield County
		Columbia County
		Elk County
		Forest County
		Greene County
		Huntingdon County
		Jefferson County
		Juniata County
		McKean County
		Mifflin County
		Montour County
		Northumberland County
		Potter County
		Schuylkill County
Snyder County		
Sullivan County		
Tioga County		
Union County		
Warren County		
Wayne County		
York-Adams HealthChoices Management Unit	York-Adams HealthChoices Joinder Governing Board	Adams County
		York County

CCBH: Community Care Behavioral Health.

The findings in this section of the report are based on IPRO’s assessment of data provided by OMHSAS resulting from the evaluation of CCBH by OMHSAS monitoring staff within the past three RYs (RYs 2022, 2021, and 2020). These evaluations are performed at the BH-MCO and Primary Contractor levels, and the findings are reported in the SMART application for 2022. OMHSAS opts to review compliance standards on a rotating basis due to the complexities of multi-county reviews. Some standards are reviewed annually, while others are reviewed triennially. In addition to those standards reviewed annually and triennially, some substandards are considered Readiness Review items only. Substandards reviewed at the time of the Readiness Review upon initiation of the HC BH Program contract are documented in the RAI. If the Readiness Review occurred within the three-year timeframe under consideration, the RAI was provided to IPRO. For those Primary Contractors and BH-MCOs that completed their Readiness Reviews outside of the current three-year timeframe, the Readiness Review substandards were deemed as complete. As necessary, the HC BH PS&R are also used.

### Description of Data Obtained

The documents informing the current report include the review of structure and operations standards completed by OMHSAS in late 2022 and entered into the SMART application as of early 2023. Information captured within the SMART application informs this report. The SMART application contains a comprehensive set of monitoring standards that OMHSAS staff review on an ongoing basis for each BH-MCO. Within each standard, the SMART application specifies the substandards or items for review, the supporting documents to be reviewed to determine compliance with each standard, the date of the review, the reviewer’s initials, and an area to collect or capture additional reviewer comments. Based on the SMART application, a BH-MCO is evaluated against substandards that crosswalk to pertinent BBA regulations (“categories”), as well as against related supplemental OMHSAS-specific SMART substandards that are part of OMHSAS’s more rigorous monitoring criteria.

The standards that are subject to EQR review are contained in *Title 42 CFR Part 438*, Subparts D and E, as well as specific requirements in Subparts A, B, C, and F to the extent that they interact with the relevant provisions in Subparts D and E. Substandard tallies for each category and section roll-up were correspondingly updated. From time to time, standards or substandards may be modified to reflect updates to the Final Rule and corresponding BBA provisions or changes to state standards. As changes are made to EQR reporting requirements, IPRO works with PA OMHSAS to update its crosswalk to the PS&R Agreement, SMART data, Information Systems Capability Assessments (ISCAs), external audit findings, and any other relevant data that pertain to federal provisions or state standards. Standards or substandards that are introduced or retired are done so following the rotating three-year schedule for all five BH-MCOs. This may, in turn, change the category tally of standards from one reporting year to the next. A null value is indicated where no crosswalk was available for a given provision for the RY period or no data for the applicable RY period were available for the reviewed managed care plan (MCP). The CMS EQRO protocols released in 2023<sup>Error! Bookmark not defined.</sup> included modifications to the BBA provisions that are now required for reporting. These updates to reporting include the addition of three new federal standards (Disenrollment, Enrollee Rights, and Emergency and Post-Stabilization Services) with results becoming available for MCPs following the aforementioned three-year schedule.

As was done for prior technical reports, review findings pertaining to the required BBA regulations are presented in this chapter. The review findings for selected OMHSAS-specific substandards are reported in **Appendix C**. The RY 2022 crosswalks of substandards to pertinent BBA regulations and to pertinent OMHSAS-specific substandards can be found in **Appendix A** and **Appendix B**, respectively.

Because OMHSAS's review of the Primary Contractors and their subcontracted BH-MCOs occurs over a three-year cycle, OMHSAS has the flexibility to assess compliance with the review standards on a staggered basis, provided that all BBA categories are reviewed within that timeframe. The three-year period is alternatively referred to as the Active Review period. The substandards from RY 2022, RY 2021, and RY 2020 provided the information necessary for the 2022 assessment. Those triennial standards not reviewed through the system in RY 2022 were evaluated on their performance based on RY 2021 and/or RY 2020 determinations, or other supporting documentation, if necessary. For those HC-OEs that completed their Readiness Reviews within the three-year timeframe under consideration, RAI substandards were evaluated when none of the substandards crosswalked to a particular BBA category were reviewed.

For CCBH, a total of 84 unique substandards were applicable for the evaluation of BH-MCO compliance with the BBA regulations for this review cycle or period (RYs 2022, 2021, 2020). In addition, 31 OMHSAS-specific substandards were identified as being related to, but are supplemental to, the BBA regulation requirements. Some substandards crosswalk to more than one BBA category, while each BBA category crosswalks to multiple substandards. In **Appendix C, Table C.1** provides a count of supplemental OMHSAS-specific substandards that are not required as part of BBA regulations but are reviewed within the three-year cycle to evaluate the BH-MCO and the associated Primary Contractors against other state-specific structure and operations standards.

**Table 3.2** tallies the substandard reviews used to evaluate the BH-MCO compliance with the BBA regulations and includes counts of the substandards that came under active review during each year of the current period (RYs 2020–2022). Substandard counts under RY 2022 comprised annual and triennial substandards. Substandard counts under RYs 2021 and 2020 comprised only triennial substandards. By definition, only the last review of annual substandards is counted in the three-year period. Because substandards may crosswalk to more than one category, the total tally of substandard reviews in **Table 3.2**, 117, differs from the unique count of substandards that came under active review (84).



Table 3.2: Tally of Substandards Pertinent to BBA Regulations Reviewed for CCBH

BBA Regulations	Evaluated SMART Substandards <sup>1</sup>		SMART Substandards Under Active Review <sup>2</sup>		
	Total	NR	2022	2021	2020
<b>CMS EQR Protocol 3 “sections” – Standards, including Enrollee Rights and Protections</b>					
Assurances of Adequate Capacity and Services (Title 42 CFR § 438.207)	5	-	5	-	-
Availability of Services (Title 42 CFR § 438.206, Title 42 CFR § 10(h))	24	-	18	2	4
Confidentiality (Title 42 CFR § 438.224)	1	3	-	-	1
Coordination and Continuity of Care (Title 42 CFR § 438.208)	2	-	-	2	-
Coverage and Authorization of Services (Title 42 CFR § 438.210(a–e), Title 42 CFR § 441, Subpart B, and § 438.114)	4	-	2	2	-
Disenrollment Requirements and Limitations (Title 42 CFR § 438.56)	1	-	-	-	1
Emergency and Post-Stabilization Services (Title 42 CFR § 438.114)	5	-	5	-	-
Enrollee Rights Requirements (Title 43 CFR § 438.100)	6	-	6	-	-
Health Information Systems (Title 42 CFR § 438.242)	2	4	-	-	2
Practice Guidelines (Title 42 CFR § 438.236)	6	-	-	2	4
Provider Selection (Title 42 CFR § 438.214)	3	-	3	-	-
Subcontractual Relationships and Delegation (Title 42 CFR § 438.230)	8	-	-	-	8
<b>CMS EQR Protocol 3 “sections” – Quality Assessment and Performance Improvement Program</b>					
Quality Assessment and Performance Improvement Program (Title 42 CFR § 438.330)	33	-	25	-	8
<b>CMS EQR Protocol 3 “sections” – Grievance System</b>					
Grievance and Appeal Systems (Title 42 CFR § 438 Parts 228, 402, 404, 406, 408, 410, 414, 416, 420, 424)	17	-	2	15	-
<b>Total</b>	<b>117</b>	<b>7</b>	<b>66</b>	<b>23</b>	<b>28</b>

<sup>1</sup>The total number of substandards required for the evaluation of Primary Contractor/BH-MCO compliance with the BBA regulations. Any substandards not reviewed indicate substandards that were deemed not applicable to the Primary Contractor/BH-MCO.

<sup>2</sup>The number of substandards that came under active review during the cycle specific to the review year. Because substandards may crosswalk to more than one category, the total tally of substandard reviews, 117, differs from the unique count of substandards that came under active review (84).

BBA: Balanced Budget Act; CCBH: Community Care Behavioral Health; SMART: Systematic Monitoring, Access, and Retrieval Technology; NR: substandards not reviewed; CMS: Centers for Medicare & Medicaid Services; EQR: external quality review; CFR: Code of Federal Regulations; §: section.

## Determination of Compliance

To evaluate Primary Contractor/BH-MCO compliance with individual provisions, IPRO grouped the required and relevant SMART substandards by provision (category) and evaluated the Primary Contractors’ and BH-MCO’s compliance status with regard to the SMART substandards. Each substandard was assigned a value of “compliant,” “partially compliant,” or “non-compliant” in the SMART application submitted by PA. If a substandard was not evaluated for a particular Primary Contractor/BH-MCO, it was assigned a value of “not reviewed.” Compliance with the BBA provisions was then determined based on the aggregate results across the three-year period of the SMART items linked to each provision. If all items were met, the Primary Contractor/BH-MCO was evaluated as compliant; if some were met and some were

partially met or not met, the Primary Contractor/BH-MCO was evaluated as partially compliant. If all items were not met, the Primary Contractor/BH-MCO was evaluated as non-compliant. A value of not applicable (N/A) was assigned to provisions for which a compliance review was not required. A value of null was assigned to a provision when none of the existing substandards directly covered the items contained within the provision, or if it was not covered in any other documentation provided. Finally, all compliance results within a given category were aggregated to arrive at a summary compliance status for the category. For example, compliance findings relating to provider network mix and capacity are summarized under Assurances of Adequate Capacity and Services, *Title 42 CFR § 438.207*.

The format for this section of the report was developed to be consistent with the categories prescribed by BBA regulations. This document groups the regulatory requirements under subject headings that are consistent with the three sections set out in the BBA regulations and described in Protocol 3: Review of Compliance with Medicaid and CHIP Managed Care Regulations. Error! Bookmark not defined. Under each general section heading are the individual regulatory categories appropriate to those headings. IPRO’s findings are therefore organized under Standards, including Enrollee Rights and Protections; QAPI Program; and Grievance System.

This format reflects the goal of the review, which is to gather sufficient foundation for IPRO’s required assessment of the Primary Contractor/BH-MCO’s compliance with BBA regulations as an element of the analysis of their strengths and weaknesses. In addition, this level of analysis avoids any redundancy with the detailed level of review found in the documents.

## Findings

Eighty-four unique substandards were used to evaluate CCBH and its Primary Contractors’ compliance with BBA regulations in RY 2022.

### Standards, Including Enrollee Rights and Protections

The general purpose of the regulations included in this section is to ensure that each Primary Contractor/BH-MCO has written policies regarding enrollee rights, complies with applicable federal and state laws that pertain to enrollee rights, and ensures that its staff and affiliated providers take into account those rights when furnishing services to enrollees.

**Table 3.3** presents the MCO and Primary Contractor substandard findings by categories.

**Table 3.3: Compliance with Standards, Including Enrollee Rights and Protections**

Federal Category and CFR Reference	Category Substandard Count	MCO Compliance Status	Primary Contractor	Substandard Status		
				Fully Compliant	Partially Compliant	Not Compliant
Assurances of Adequate Capacity and Services ( <i>Title 42 CFR § 438.207</i> )	5	Compliant	All CCBH Primary Contractors	1.1, 1.2, 1.4, 1.5, 1.6	-	-
Availability of Services ( <i>Title 42 CFR § 438.206</i> )	24	Partially compliant	All CCBH Primary Contractors	1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.7, 23.1, 23.2, 23.3, 23.4, 23.5, 24.1, 24.2, 24.3, 24.4, 24.5, 24.6, 28.2, 93.1, 93.2, 93.3, 93.4	-	28.1

Federal Category and CFR Reference	Category Substandard Count	MCO Compliance Status	Primary Contractor	Substandard Status		
				Fully Compliant	Partially Compliant	Not Compliant
Confidentiality (Title 42 CFR § 438.224)	1	Compliant	All CCBH Primary Contractors	120.1	-	-
Coordination and Continuity of Care (Title 42 CFR § 438.208)	2	Partially compliant	All CCBH Primary Contractors	28.2	-	28.1
Coverage and Authorization of Services (Title 42 CFR § 438.210(a-e), § 441, Subpart B, and § 438.114)	4	Partially compliant	All CCBH Primary Contractors	28.2, 72.1, 72.2	-	28.1
Disenrollment Requirements and Limitations (Title 42 CFR § 438.56)	1	Compliant	All CCBH Primary Contractors	120.1	-	-
Emergency and Post-Stabilization Services (Title 42 CFR § 438.114)	5	Compliant	All CCBH Primary Contractors	72.2, 91.3, 91.5, 91.7, 91.9	-	-
Enrollee Rights Requirements (Title 42 CFR § 438.100)	6	Compliant	All CCBH Primary Contractors	11.2, 24.3, 24.4, 24.5, 24.6, 72.2	-	-
Health Information Systems (Title 42 CFR § 438.242)	2	Compliant	All CCBH Primary Contractors	120.1, 141.1	-	-
Practice Guidelines (Title 42 CFR § 438.236)	6	Partially compliant	All CCBH Primary Contractors	28.2, 93.1, 93.2, 93.3, 93.4	-	28.1
Provider Selection (Title 42 CFR § 438.214)	3	Compliant	All CCBH Primary Contractors	10.1, 10.2, 10.3	-	-
Subcontractual Relationships and Delegation (Title 42 CFR § 438.230)	8	Compliant	All CCBH Primary Contractors	99.1, 99.2, 99.3, 99.4, 99.5, 99.6, 99.7, 99.8	-	-

MCO: managed care organization; CFR: Code of Federal Regulations; CCBH: Community Care Behavioral Health; §: section.

There are 12 categories within Standards, including Enrollee Rights and Protections. CCBH and its Primary Contractors were compliant with eight categories and partially compliant with four categories.

There were 67 substandard reviews for CCBH and its Primary Contractors within Compliance with Standards, including Enrollee Rights and Protections. CCBH and its Primary Contractors were compliant in 63 reviews and not compliant in four reviews. Some substandards apply to more than one BBA category. As a result, one partially compliant or non-compliant rating for an individual substandard could result in several BBA categories with partially compliant or non-compliant ratings.

### *Availability of Services*

CCBH was partially compliant with Availability of Services due to non-compliance with Substandard 1 within Standard 28 (RY 2021).

**Standard 28:** BH-MCO has a comprehensive, defined program of care that incorporates longitudinal disease management.

**Substandard 1:** Clinical/chart reviews reflect appropriate consistent application of medical necessity criteria and active care management that identify and address quality of care concerns.

### *Coordination and Continuity of Care*

CCBH was partially compliant with Coordination and Continuity of Care due to non-compliance with Substandard 1 within Standard 28 (RY 2021).

**Standard 28:** See Standard description and determination of compliance under Availability of Services.

**Substandard 1:** See Substandard description and determination of compliance under Availability of Services.

### *Coverage and Authorization of Services*

CCBH was partially compliant with Coverage and Authorization of Services due to non-compliance with Substandard 1 within Standard 28 (RY 2021).

**Standard 28:** See Standard description and determination of compliance under Availability of Services.

**Substandard 1:** See Substandard description and determination of compliance under Availability of Services.

### *Practice Guidelines*

CCBH was partially compliant with Practice Guidelines due to non-compliance with Substandard 1 within Standard 28 (RY 2021).

**Standard 28:** See Standard description and determination of compliance under Availability of Services.

**Substandard 1:** See Substandard description and determination of compliance under Availability of Services.

### **Quality Assessment and Performance Improvement Program**

The general purpose of the regulations included under this subpart is to ensure that all services available under PA's MMC program, the HC Program, are available and accessible to MCO enrollees. The documents include an assessment of the Primary Contractors/BH-MCO's compliance with regulations found in Subpart D. **Table 3.4** presents the findings by categories consistent with the regulations.

Table 3.4: Compliance with Quality Assessment and Performance Improvement Program

Federal Category and CFR Reference	Category Substandard Count	MCO Compliance Status	Primary Contractor	Substandard Status		
				Fully Compliant	Partially Compliant	Not Compliant
Quality Assessment and Performance Improvement Program (Title 42 CFR § 438.330)	33	Compliant	All CCBH Primary Contractors	91.1, 91.2, 91.3, 91.4, 91.5, 91.6, 91.7, 91.8, 91.9, 91.10, 91.11, 91.12, 91.13, 91.14, 91.15, 93.1, 93.2, 93.3, 93.4, 98.1, 98.2, 98.3, 100.1, 104.1, 104.2, 104.3, 104.4, 108.2, 108.5, 108.6, 108.7, 108.8, 108.10	-	-

MCO: managed care organization; CFR: Code of Federal Regulations; CCBH: Community Care Behavioral Health; §: section.

For this review, 33 substandards were crosswalked to Quality Assessment and Performance Improvement Program. All 33 substandards were reviewed for all Primary Contractors associated with CCBH. CCBH and its Primary Contractors were compliant with 33 substandards.

### Grievance System

The general purpose of the regulations included under this subpart is to ensure that enrollees have the ability to pursue grievances. The documents include an assessment of the Primary Contractor/BH-MCO’s compliance with regulations found in Subpart F. **Table 3.5** presents the findings by categories consistent with the regulations.

Table 3.5: Compliance with Grievance System

Federal Category and CFR Reference	Category Substandard Count	MCO Compliance Status	Primary Contractor	Substandard Status		
				Fully Compliant	Partially Compliant	Not Compliant
Grievance and Appeal Systems (Title 42 CFR § 438 Parts 228, 402, 404, 406, 408, 410, 414, 416, 420, 424)	17	Partially compliant	All CCBH Primary Contractors	60.1, 60.2, 68.1, 68.2, 68.3, 68.4, 68.7, 68.9, 71.1, 71.2, 71.3, 71.4, 71.9, 72.1, 72.2	60.3, 71.7	-

MCO: managed care organization; CFR: Code of Federal Regulations; CCBH: Community Care Behavioral Health; §: section.

For this review, 17 substandards were crosswalked to Grievance System. All 17 substandards were reviewed for all Primary Contractors associated with CCBH. CCBH and its Primary Contractors were compliant with 15 substandards and partially compliant with two substandards.

### *Grievance and Appeal Systems*

CCBH was partially compliant with Grievance and Appeal Systems due to partial compliance with Substandard 3 of Standard 60 (RY 2021) and partial compliance with Substandard 7 of Standard 71 (RY 2021).

**Standard 60:** Complaint and Grievance Staffing and Policies and Procedures.

**Substandard 3:** The BH-MCO's Complaint and Grievance policies and procedures comply with the requirements set forth in Appendix H.

**Standard 71:** The Grievance and Fair Hearing processes, procedures and Member rights related to the processes are made known to Members, BH-MCO staff and the provider network through manuals, training, handbooks, etc.

**Substandard 7:** Grievance case files include documentation that Member rights and the Grievance process were reviewed with the Member.

## IV: Validation of Network Adequacy

### Objectives

As set forth in *Title 42 CFR § 438.358*, validation of network adequacy is a mandatory EQR activity. Title 42 CFR § 438.68(a) requires states that contract with an MCP to deliver services, as well as develop, monitor, and enforce network adequacy standards consistent with the requirements under *Title 42 CFR § 438.68(b)(1)(iii)* and *§ 457.1218*. For BH, those requirements include: applying quantitative network adequacy standards, ensuring timely access to services, ensuring provider accessibility, allowing access to out-of-network providers, documenting an MCO's capacity to serve all enrollees, and adhering to the 2008 Mental Health Parity and Addictions Equity Act (MHPAEA) regulations on treatment limitations.<sup>8</sup> The EQRO is expected to validate network adequacy reporting for each MCP that assesses the confidence level of network adequacy findings for each applicable standard. EQRO validation is limited to assessment of the validity of network adequacy findings and does not include assessment of the network adequacy standards themselves. The purpose of this section is to report the EQRO's validation assessment of network adequacy findings for the BH-MCO and its associated Primary Contractors. In accordance with the updates to the CMS EQRO protocols released in February 2023,<sup>2</sup> the EQRO is to conduct six activities, as outlined in **Table 4.1**.

Table 4.1: Network Adequacy Validation Activities

Activity	Category
Define the scope of the validation	Planning
Identify data sources for validation	Planning
Review information systems	Analysis
Validate network adequacy	Analysis
Communicate preliminary findings to MCO	Reporting
Submit findings to the state	Reporting

MCO: managed care organization.

Starting in February 2024, states must have in place a network adequacy monitoring and reporting program that stipulates state standards for the applicable plan type and corresponding quantitative indicators for network adequacy and collects data, analyzes those data, and reports findings on network adequacy on a regular basis. Regardless of whether network adequacy monitoring and reporting is conducted by the MCO or the state, the EQRO is expected to assess the validity of data collected on each applicable indicator, as well as the validity of the analyses and resulting findings. While MY 2022 predates the publication of the February 2023 protocol, IPRO was able to work with PA OMHSAS on the six EQR activities. These activities enumerated the relevant standards and corresponding indicators that were in effect in MY 2022, collected MY 2022 results, and, finally, assessed the validity of those results.

### Technical Methods of Data Collection and Analysis

IPRO gathered information from PA OMHSAS to conduct preliminary network adequacy validation activities using worksheets 4.1, 4.2, and 4.3 of the 2023 CMS EQR protocols. PA OMHSAS completed the three worksheets, which listed and described: the network adequacy standards that were in effect for the MY (Worksheet 4.1), the quantitative indicators used to assess compliance with the network adequacy standards (Worksheet 4.2), and the data source(s) used for each indicator (Worksheet 4.3). IPRO supplemented this information using results from an ISCA conducted on the MCO in 2023. Using this information, IPRO then assessed the data sources and data collection procedures for validity, including measurement validity, accuracy, and completeness. For MY 2022, network adequacy monitoring and reporting were carried out by PA using its Medicaid Enterprise Monitoring Module (MEMM) to collect and analyze data, submitted by the MCO, on geographic access by provider type. Results are compared to its network adequacy standards and recorded in its SMART compliance application at the Primary Contractor level. An extract of the SMART data for MY 2022 was then shared with IPRO.

### Description of Data Obtained

**Table 4.2** summarizes the state network adequacy standards that were applicable to BH-MCOs and their Primary Contractors in MY 2022, the frequencies of data reporting by the MCO, and corresponding network adequacy indicators.

Table 4.2 BH-MCO Network Adequacy Standards and Indicators Applicable in MY 2022

Network Adequacy Standard	Applicable Provider Type	Data and Documentation Submitted by MCO (Frequency)	Network Adequacy Indicator
<p>The Primary Contractor and its BH-MCO must maintain a Provider network for all Members which is geographically accessible to Members. All levels of care must be accessible in a timely manner. Members must have a choice of at least two Providers.</p>	Intensive Behavioral Health Services	Provider network data files (weekly)	<p>Proportion of members living in an urban designated county who have access to each level of care within 30 minutes travel time from their residence; proportion of members living in a rural designated county who have access to each level of care within 60 minutes travel time from their residence.</p>
	Clozaril Support	Provider network data files (weekly)	
	Medically Managed Intensive Inpatient Services (ASAM Level 4)	Provider network data files (weekly)	
	Medically Managed Intensive Inpatient Withdrawal Management (ASAM Level 4 WM)	Provider network data files (weekly)	
	Drug and Alcohol Methadone Maintenance	Provider network data files (weekly)	
	Drug and Alcohol Outpatient	Provider network data files (weekly)	
	Family Based Mental Health Services	Provider network data files (weekly)	
	Inpatient Psychiatric – Adult	Provider network data files (weekly)	
	Inpatient Psychiatric – Child/Adolescent	Provider network data files (weekly)	
	Mental Health Crisis Intervention	Provider network data files (weekly)	
	Mental Health Outpatient (Psychiatric Clinic)	Provider network data files (weekly)	
	Mental Health Partial Hospitalization – Child/Adolescent	Provider network data files (weekly)	
	Peer Support	Provider network data files (weekly)	
	Residential Treatment Facility (RTF)	Provider network data files (weekly)	
	Targeted Case Management (TCM)	Provider network data files (weekly)	
Center of Excellence (OUD Treatment)	Provider network data files (weekly)		

BH-MCO: behavioral health managed care organization; ASAM: American Society of Addiction Medicine; WM: withdrawal management.



## Findings

One network adequacy indicator for each applicable provider type was used by PA OMHSAS to measure compliance by the MCO and its Primary Contractors on the network adequacy standard that was in place in MY 2022. IPRO's ISCA of CCBH in MY 2022 revealed CCBH utilizes Quest Analytics® Suite software and reporting to monitor provider network adequacy across geographic areas. The ISCA showed that CCBH adequately met Information Systems utility requirements for reviewing provider network adequacy. The provider network data files are submitted to PA's MEMM and subsequently analyzed each year by OMHSAS to calculate rates for the network adequacy indicator for each provider category. These results are then recorded under Primary Contractor results for Substandard 1.2 in the SMART application:

**Standard 1:** The Program must include a full array of in-plan services available to adults and children. Provider contracts are in place.

**Substandard 2:** 100% of members given choice of two providers at each level of care within 30/60 miles urban/rural met.

For MY 2022, CCBH and all of its Primary Contractors were found to be fully compliant (for all provider categories) with Substandard 1.2 and the corresponding network adequacy standard.

After review of the relevant ISCA findings, network adequacy data, and methods, IPRO has high confidence in the validity of these MY 2022 results.

## V: Quality Studies

### Objectives

The purpose of this section is to describe quality studies performed in 2022 for the HC population. The studies are included in this report as optional EQR activities that occurred during the RY. Error! Bookmark not defined.

### Integrated Community Wellness Centers

In 2019, PA DHS made the decision to discontinue participation in the Certified Community Behavioral Health Clinic (CCBHC) Demonstration but to continue and build on the CCBHC model in a PA DHS-administered ICWC program under an MMC agreement with CMS. The purpose of the CCBHC Demonstration was to develop and test an all-inclusive (and all-payer) prospective payment system model for community clinics to integrate behavioral and physical health care services in a more seamless manner. The model is centered on the provision of nine core services. Crisis services, BH screening, assessment and diagnosis, treatment planning, and outpatient mental health and substance use services, along with outpatient clinic primary care screening and monitoring, are provided or managed directly by the ICWC clinics. The remaining four services, including targeted case management, peer support, psychiatric rehabilitation services, and intensive community-based mental health care to members of the armed forces and veterans, may be provided through a contract with a designated collaborating organization (DCO). To receive CCBHC certification, clinics also had to provide a minimum set of evidence-based practices (EBP), which was selected based on community needs assessments and centered on recovery-oriented care and support for children, youth, and adults. Under ICWC, the same nine core services of the CCBHC model are provided under PA's HC MMC program using a similar bundled payment arrangement with clinics certified to participate as ICWC clinics. For the first year of ICWC, 2020, the following original seven clinics were invited to participate in the new program: Berks Counseling Center (located in Reading, PA), CenClear (with a clinic site in Clearfield, PA and in Punxsutawney, PA), the Guidance Center (located in Bradford, PA), Northeast Treatment Centers (located in Philadelphia, PA), Pittsburgh Mercy (located in Pittsburgh, PA), and Resources for Human Development (located in Bryn Mawr, PA).

### Description of Data Obtained

Like CCBHC, ICWC features a process measure dashboard, hosted by the EQRO. Clinics enter monthly, quarterly, and year-to-date (YTD) data into a REDCap® project that feeds, on a weekly basis, a server-based Tableau workbook in which clinics are able to monitor progress on the implementation of their ICWC model. Using the dashboard, clinics in 2022 tracked and reported on clinical activities in a range of quality domains reflecting the priorities of the initiative: clinic membership, process, access and availability, engagement, evidence-based practices, and client satisfaction. The Tableau workbook also featured a comparative display that showed clinic and statewide results on each process measure.

### Findings

In 2022, the number of individuals receiving at least one core service dropped to 15,345 from 22,690 in 2021. The unweighted average (across all the clinics) of the number of days until initial evaluation increased to 12.4 days from 10.8 days in 2021. In the area of depression screening and follow-up, 89% of positive screenings resulted in the documentation of a follow-up plan the same day. A little over 2,700 individuals within the ICWC program received drug and alcohol outpatient or intensive outpatient treatment during the period, down 50% from 5,400 in 2021.

Process measures reflect important progress in increasing both the access and quality of community-based care for individuals with BH conditions, but the ICWC quality measures are designed to more meaningfully measure the impact of these efforts. Under the CMS-approved ICWC preprint, a subset of the CCBHC measures is reported to CMS on an annual CY basis, along with the HEDIS FUI measure. **Table 5.1** summarizes how well the ICWC clinics performed on quality measures compared to applicable performance targets and national benchmarks.

Table 5.1: ICWC Quality Performance Compared to Targets and National Benchmarks

Measure	ICWC CY 2022 Weighted Average	Comparison	
		ICWC CY 2022 Performance Target	Benchmark Performance
Follow-Up After High-Intensity Care for Substance Use Disorder (FUI) – 7 day	13.0%	32.5%	Between the 5th and 10th percentiles of the HEDIS 2023 Quality Compass
Follow-Up After High-Intensity Care for Substance Use Disorder (FUI) – 30 day	21.0%	53.8%	Below the 5th percentile of the HEDIS 2023 Quality Compass
Follow-Up Care for Children Prescribed ADHD Medication (ADD) – Initiation	66.0%	80.2%	Above the 95th percentile of the HEDIS 2023 Quality Compass
Follow-Up Care for Children Prescribed ADHD Medication (ADD) – Continuation and Maintenance	75.0%	81.5%	Above the 95th percentile of the HEDIS 2023 Quality Compass
Follow-Up After Emergency Department Visit for Alcohol and Other Drug Abuse or Dependence (FUA) – 7 day	43.8%	26.7%	Between the 90th and 95th percentiles of the HEDIS 2023 Quality Compass
Follow-Up After Emergency Department Visit for Alcohol and Other Drug Abuse or Dependence (FUA) – 30 day	66.7%	39.0%	Above the 95th percentile of the HEDIS 2023 Quality Compass
Follow-Up After Emergency Department Visit for Mental Illness (FUM) – 7 day	100%	100%	Above the 95th percentile of the HEDIS 2023 Quality Compass
Follow-Up After Emergency Department Visit for Mental Illness (FUM) – 30 day	100%	100%	Above the 95th percentile of the HEDIS 2023 Quality Compass
Initiation and Engagement of Alcohol and Other Drug Abuse or Dependence Treatment (IET), ages 18–64 years – Initiation	21.9%	N/A	Below the 5th percentile of the HEDIS 2023 Quality Compass
Initiation and Engagement of Alcohol and Other Drug Abuse or Dependence Treatment (IET), ages 18–64 years – Engagement	7.2%	N/A	Between the 10th and 25th percentiles of the HEDIS 2023 Quality Compass
Follow-Up After Hospitalization for Mental Illness, ages 18–64 years (FUH-A) – 7 day	10.6%	30.2%	Below the 5th percentile of the HEDIS 2023 Quality Compass
Follow-Up After Hospitalization for Mental Illness, ages 18–64 years (FUH-A) – 30 day	19.1%	41.6%	Below the 5th percentile of the HEDIS 2023 Quality Compass
Follow-Up After Hospitalization for Mental Illness, ages 6–17 years (FUH-C) – 7 day	19.5%	43.8%	Between the 5th and 10th percentiles of the HEDIS 2023 Quality Compass
Follow-Up After Hospitalization for Mental Illness, ages 6–17 years (FUH-C) – 30 day	28.3%	55.6%	Below the 5th percentile of the HEDIS 2023 Quality Compass
Antidepressant Medication Management (AMM) – Acute	56.1%	62.5%	Between the 25th and 33rd percentiles of the HEDIS 2023 Quality Compass

Measure	ICWC CY 2022 Weighted Average	Comparison	
		ICWC CY 2022 Performance Target	Benchmark Performance
Antidepressant Medication Management (AMM) - Continuation	39.8%	38.5%	Between the 25th and 33rd percentiles of the HEDIS 2023 Quality Compass
Adherence to Antipsychotic Medications for Individuals with Schizophrenia (SAA)	55.9%	62.1%	Between the 25th and 33rd percentiles of the HEDIS 2023 Quality Compass
Diabetes Screening for People with Schizophrenia or Bipolar Disorder Who Are Using Antipsychotic Medications (SSD)	77.3%	85.0%	Between the 25th and 33rd percentiles of the HEDIS 2023 Quality Compass
Plan All-Cause Readmissions Rate (PCR) – Observed Rate	30.0%	3.8%	N/A (HEDIS 2023 Quality Compass Observed Rate benchmarks not available)
Child and Adolescent Major Depressive Disorder (MDD): Suicide Risk Assessment (SRA-BH-C)	59.5%	100%	Between the 70th and 80th percentiles of the MIPS 2023 (eCQM)
Adult Major Depressive Disorder (MDD): Suicide Risk Assessment (SRA-A)	32.2%	100%	Between the 50th and 60th percentiles of the MIPS 2023 (eCQM)
Screening for Depression and Follow-Up Plan (CDF-BH)	36.8%	47.5%	Between the 50th and 60th percentiles of the MIPS 2023 (eCQM)
Depression Remission at Twelve Months (DEP-REM-12)	63.3%	15.0%	Above the 95th percentile of the MIPS 2023 (eCQM)
Body Mass Index (BMI) Screening and Follow-Up Plan	42.7%	62.5%	Between the 10th and 20th percentiles of the MIPS 2023 (eCQM)
Weight Assessment for Children/Adolescents: Body Mass Index Assessment for Children/Adolescents (WCC-BH)	63.9%	80.0%	Between the 80th and 90th percentiles of the MIPS 2023 (eCQM)
Tobacco Use: Screening and Cessation Intervention (TSC)	87.4%	N/A	Between the 60th and 70th percentiles of the MIPS 2023 (CQM)
Unhealthy Alcohol Use: Screening and Brief Counseling (ASC)	65.5%	N/A	Between the 50th and 60th percentiles of the MIPS 2023 (CQM)

ICWC: Integrated Community Wellness Center; HEDIS: Healthcare Effectiveness Data and Information Set; ADHD: attention deficit/hyperactivity disorder; MIPS: Merit-Based Incentive Pay System; eCQM: electronic clinical quality measure; CQM: clinical quality measure; N/A: not applicable, no performance target was set for measurement year 2022.

Quality measures where the ICWC clinics met or surpassed targets include: Follow-Up After Emergency Department Visit for Mental Illness (FUM), Antidepressant Medication Management (AMM) – Continuation, and Depression Remission at Twelve Months (DEP-REM-12).

## VI: MCO Responses to 2022 EQR Recommendations

### Current and Proposed Interventions

The general purpose of this section is to assess the degree to which each BH-MCO has effectively addressed the opportunities for improvement cited by IPRO in the 2022 (MY 2021) EQR annual technical report and in the 2023 (MY 2022) FUH All Ages Goal Report.

The BH-MCOs are required by OMHSAS to submit descriptions of current and proposed interventions using the Opportunities for Improvement form developed by IPRO to ensure that responses are reported consistently across the PA Medicaid BH-MCOs. These activities follow a longitudinal format and are designed to capture information relating to:

- follow-up actions that the BH-MCO has taken through June 30, 2023, to address each recommendation;
- future actions that are planned to address each recommendation;
- when and how future actions will be accomplished;
- the expected outcome or goals of the actions that were taken or will be taken; and
- the BH-MCO's process(es) for monitoring the action to determine the effectiveness of the actions taken.

The documents informing the current report include the MCO responses submitted to IPRO in September 2023 to address partial and non-compliant standards findings, as well as any additional relevant documentation provided by the BH-MCO.

The request for MCO response to the opportunities for improvement related to MY 2021 underperformance in the HEDIS FUH All Ages measures was distributed, along with the MY 2021 results, in January 2023. The RCA and QIP form similarly provides for a standardized format for BH-MCOs to describe root causes of underperformance and propose a detailed QIP to address those factors, complete with a timeline of implementation, monitoring, and reporting activities. BH-MCOs submitted their responses by March 17, 2023, and the Primary Contractors submitted their responses by March 31, 2023.

### Quality Improvement Plan for Partial and Non-compliant SMART Standards

All actions targeting opportunities for improvement with the structure and operational standards are monitored for effectiveness by OMHSAS. Based on the OMHSAS findings for RY 2021, CCBH began to address opportunities for improvement related to compliance categories within two of the three CMS sections pertaining to compliance with MMC regulations. CCBH was partially compliant with four categories within Standards, including Enrollee Rights and Protections: Availability of Services, Coordination and Continuity of Care, Coverage and Authorization of Services, and Practice Guidelines. Within Compliance with Grievance System, CCBH was partially compliant with Grievance and Appeal Systems. Proposed actions and evidence of actions taken by CCBH were monitored through action plans, technical assistance calls, monitoring meetings, and quality and compliance reviews. OMHSAS will continue these monitoring activities until sufficient progress has been made to bring CCBH into compliance with the relevant Standards.

The embedded document presents CCBH's responses to opportunities for improvement cited by IPRO in the 2022 (MY 2021) EQR annual technical report, detailing current and proposed interventions. Original references to "PEPS" have been replaced with "SMART." Objects originally embedded within the MCO response have been removed as exhibits. The entire MCO response is available upon request.



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## Root Cause Analysis and Quality Improvement Plan

For PMs that are noted as opportunities for improvement in the EQR annual technical report, BH-MCOs are required to submit:

- a goal statement;
- RCA and analysis findings;
- action plan to address findings;
- implementation dates; and
- a monitoring plan to assure action is effective and to address what will be measured and how often that measurement will occur.

In 2023, OMHSAS made a few important changes to the PM remediation process. First, it added REA to the process by requiring BH-MCOs and Primary Contractors to submit QIPs for rates above the statewide goal of 11.75%. BH-MCOs assigned a QIP are also required to complete an RCA that informs their QIP. Furthermore, QIPs must address any racial or ethnic disparities in PM rates. Finally, OMHSAS extended the timeframe of RCAs and QIPs to every two years. This is designed to give interventions more time to work while reducing the administrative burden.

In MY 2022, CCBH scored below the HEDIS Quality Compass 75th percentile on both the HEDIS FUH 7-day and 30-day measures and, as a result, was required to complete an RCA and QIP response for both measures. CCBH's REA rate was above the 11.75% benchmark and was therefore also required to complete an RCA and QIP to address REA.

The embedded documents present CCBH's responses to opportunities for improvement cited by IPRO in the 2022 (MY 2021) EQR annual technical report, detailing current and proposed interventions. Objects originally embedded within the MCO response have been removed as exhibits. The entire MCO response is available upon request.



CCBH\_HEDIS All Ages  
7DAY FUH RCA and Q



CCBH\_HEDIS All Ages  
30DAY FUH RCA and Q



CCBH\_ REA RCA and  
QIP Response\_MY 202

## VII: 2023 Strengths, Opportunities for Improvement, and Recommendations

This section provides an overview of CCBH's MY 2022 performance with identified strengths and opportunities for improvement in the following areas: structure and operations standards, PIPs, and PMs. This section also provides an assessment of the strengths and weaknesses of CCBH with respect to (a) quality, (b) timeliness, and (c) access to the health care services furnished by each MCO, prepaid inpatient health plan (PIHP), prepaid ambulatory health plan (PAHP), or primary care case management (PCCM) entity, as described in *Title 42 CFR 438.310(c)(2)*.

### Strengths

- Based on review of CCBH's Year 2 PIP report, there is high confidence that the PIP adhered to acceptable methodology for all phases of design and data collection, data analysis, and interpretation of PIP results.
- Review of compliance with MMC regulations conducted by PA in RY 2020, RY 2021, and RY 2022 found CCBH to be fully compliant with the following standards: Assurances of Adequate Capacity and Services, Confidentiality, Disenrollment Requirements and Limitations, Emergency and Post-Stabilization Services, Enrollee Rights Requirements, Health Information Systems, Provider Selection, Subcontractual Relationships and Delegation, and Quality Assessment and Performance Improvement Program.
- For MY 2022, CCBH and all of its Primary Contractors were found to be fully compliant (for all provider categories) with Standard 1.2 and the corresponding network adequacy standard. After review of the relevant ISCA findings, network adequacy data, and methods, IPRO has high confidence in the validity of these MY 2022 results.

### Opportunities for Improvement

- There is moderate confidence that the PIP produced evidence of significant improvement.
- CCBH's MY 2022 HEDIS 7-day and 30-day FUH rates (QI 1 and QI 2) for ages 18–64 years and ages 6+ years were below their respective HEDIS Quality Compass 75th percentiles.
- CCBH's MY 2022 PA-specific 7-day and 30-day FUH rates (QI A and QI B) for ages 6+ years were below the MY 2021 rate.
- CCBH's MY 2022 REA rate did not meet the OMHSAS designated performance goal of 11.75%.
- Review of Compliance with Standards conducted by PA in RY 2020, RY 2021, and RY 2022 found CCBH to be partially compliant with the two sections associated with MMC regulations.
  - CCBH was partially compliant in 4 out of 12 categories within Compliance with Standards, including Enrollee Rights and Protections. The partially compliant categories are: 1) Availability of Services, 2) Coordination and Continuity of Care, 3) Coverage and Authorization of services, and 4) Practice Guidelines.
  - CCBH was partially compliant with the single category of Grievance and Appeal Systems within Grievance System.

### Assessment of Quality, Timeliness, and Access

Responsibility for **quality** of, **timeliness** of, and **access** to health care services and supports is distributed among providers, payers, and Primary Contractors. Due to the BH carve-out within PA's HC program, BH-MCOs and physical health managed care organizations (PH-MCOs) operate under separate contracts, with BH-MCOs contracting with non-overlapping Primary Contractors, making this distribution even more complex. However, when it comes to improving healthcare quality, timeliness, and access, the BH-MCO can focus on factors within its control.

**Table 7.1** details the full list of recommendations that are made for the MCO for each of the applicable EQR activities. For PIPs, the recommendations are based on the review that was conducted for MY 2022. The PIP recommendations may include issues from prior years if they remain unresolved. For PMs, the strengths and opportunities noted above in this section summarize findings from the current report, while recommendations are based on issues that were not only identified as opportunities from the current report but were also identified as outstanding opportunities from last year's EQR technical report.

Table 7.1: EQR Recommendations

EQR Task/Measure	MY 2021 Recommendation	MY 2022 Finding	MY 2022 Recommendation	Standards
Performance Improvement Projects (PIPs)				
<p>Prevention, Early Detection, Treatment, and Recovery (PEDTAR) for Substance Use Disorders</p>	<p>It was noted that overall Year 1 performance indicator goals had not been achieved, but some counties did see improvements. IPRO suggested CCBH drill deeper into the differences in these counties in order to possibly extract lessons. In addition, comparison to national % changes in relevant measures like FUI may also provide a way to check for counterfactuals.</p>	<p>Based on review of CCBH’s Year 2 report, there was high confidence that the PIP adhered to acceptable methodology for all phases of design and data collection and conducted accurate data analysis and interpretation of PIP results (Rating 1). There were no validation findings that indicate that the credibility of the PIP results is at risk.</p> <p>There is moderate confidence that the PIP produced evidence of significant improvement (Rating 2). Some measures (FUI 30-day, MHR, and MAT-OD) present a mixed picture, with improvements in some cases through Year 1 and then slowing or even reversing progress in Year 2. All other performance indicator rates (FUI 7-day, SAR, and MAT-AUD) worsened since Year 1.</p>	<p>As relates to Rating 1, IPRO recommends the following:</p> <ul style="list-style-type: none"> <li>• The only note of caution is some of the low response rates of some of the public health surveys, especially for the Anti-Stigma Campaign (ITM PHb.ii) in quarter 4 of 2022. If low response rates continue, CCBH will need to address the potential for bias in results going forward for these important measures related to its public health strategy interventions.</li> </ul> <p>As relates to Rating 2, IPRO recommends the following:</p> <ul style="list-style-type: none"> <li>• CCBH makes a somewhat strong case for expecting improvement down the line based on steady improvements in some of its ITMs, which serve as useful leading indicators. On the other hand, ITMs like 1a, 1b, 2a suggest inconsistent or unclear results, especially with newer interventions like its Recovery Management Checklist intervention. Actualization of improvements in the sustainable improvement year of the PIP will depend on continued effort,</li> </ul>	<p>Quality, Timeliness, Access</p>



EQR Task/Measure	MY 2021 Recommendation	MY 2022 Finding	MY 2022 Recommendation	Standards
			vigilance, and a readiness to adjust if needed.	
<b>Performance Measures</b>				
<p>HEDIS Follow-Up After Hospitalization for Mental Illness (FUH)</p>	<p>In a reversal from the previous year, 2021 saw a significant drop in CCBH’s follow-up rates. In its RCA, CCBH notes many factors centering mostly on its members, for example problems addressing childcare or obtaining transportation, although CCBH also notes larger provider (e.g., lack of psychiatrists) and systemic issues such as stigma. Its RCA remains robust, as do many of its interventions. QIP interventions that show promise, like the Admissions Interview-- members who received an Admission Interview were 13 percentage points more likely to have follow-up in 30-days—and High Risk Care Management, should be continued and possibly expanded. Where questions remain, CCBH should continue to leverage its in-house data to evaluate interventions like the Collaborative Care at FQHCs to determine which interventions are helping improve follow-up rates and which ones are not, and why. In its current PEDTAR PIP, CCBH is leveraging its partnership with counties, single county authorities, and Centers of Excellence (COEs) to improve warm handoffs for initiation and engagement into specialty SUD treatment as well as improve MAT penetration</p>	<p>CCBH’s HEDIS FUH MY 2022 rates were below the HEDIS Quality Compass 75th percentiles. In MY 2022, FUH rates continued their decline for most of CCBH’s Primary Contractors for most of the age cohorts measured. CCBH’s decline was statistically significant for the HEDIS FUH ages 18–64 years and overall (all ages) categories but not for children ages 6–17 years.</p> <p>In 2022, CCBH reports that care managers conducted over 4,300 FUH admission interviews with members, along with almost 3,000 aftercare outreach interviews that focused on understanding the drivers to psychiatric admission and, for those members not following up after discharge, why they did not follow up even when appointments were made. For the majority of admissions (55%), social determinants of health (SDoH) were identified as drivers. Particularly for members with multiple conditions, SDoH factors can have a significant impact on follow-up care. Interviews with facilities and care managers also suggest that staffing shortages are exacerbating existing discharge planning gaps, particularly around medication management, complicating follow-up care for members. In summary, CCBH has done exemplary</p>	<p>CCBH and its Primary Contractors should look to some of its more successful Primary Contractors like BHARP, Blair, and Erie counties, for insights on how to improve follow-up rates. Analysis may need to be measure- and even age-specific, as results suggest Primary Contractors perform relatively better or worse depending on the age cohort and whether the FUH measure is HEDIS versus PA-specific.</p> <p>IPRO commends CCBH’s multi-pronged approach and encourages CCBH to continue with the interventions it has identified in its HEDIS FUH quality improvement plans. CCBH rates have declined in recent years, but the quality of the plans suggests recalibration as opposed to overhauling existing interventions, particularly as the new and newly expanded data and information become available.</p> <p>Given the complex scope and limited</p>	<p>Timeliness, Access</p>

EQR Task/Measure	MY 2021 Recommendation	MY 2022 Finding	MY 2022 Recommendation	Standards
	<p>rates, especially for its historically underserved African American and Hispanic members. To the extent that there is comorbidity, CCBH should expect FUH of such members to improve as their SUD conditions are better identified and managed. The PIP’s anti-stigma campaign, combined with provider trainings, will also help improve performance with respect to prevention. And the expansion of VBP arrangements to COEs in CCBH’s service area effective January 2023 should also be expected to improve FUH of MH-SUD comorbid members. Expansion of the network also shows promise in addressing MH treatment shortage areas. Finally, CCBH’s focus on addressing health equity, as evidenced by its recent NCQA Health Equity Accreditation, should translate to reduce observed inequities in many quality areas, including follow-up.</p>	<p>work carrying out root cause analyses of barriers to follow-up after hospitalization for mental illness. They have combined this analysis with ongoing monitoring and Tableau dashboarding of their own to identify different barriers and trends by various stratification of interest. For example, they report that racial disparities may be linked to cultural issues such as stigma, while transportation appears to be a larger concern in rural as opposed to urban areas.</p>	<p>resources, a next step for CCBH and its Primary Contractors to consider is to identify the largest cohorts (however they are defined) of qualifying FUH discharges and focus on those factors that appear to be the biggest drivers of follow-up rates for those cohorts.</p>	
PA FUH	See recommendation for HEDIS FUH.	CCBH’s PA-specific FUH similarly fell in MY 2022, and the decline was seen across all its Primary Contractors that could be measured (Delaware started its contract in July 2022).	See recommendation for HEDIS FUH.	Timeliness, Access
Readmission Within 30 Days of Inpatient Psychiatric Discharge (REA)	CCBH continues to make progress on reducing readmissions after hospitalizations for mental illness, although the MCO rate remain unchanged from MY 2020, suggesting CCBH should continue with, and possibly expand,	CCBH’s REA MY 2022 was above (worse than) the statewide goal of 11.75%. Readmission rates also worsened (increased) in MY 2022, but the change was not statistically significant. Four of CCBH’s Primary Contractors were statistically	IPRO agrees with CCBH’s assessment and proposed interventions in its REA quality improvement plan, which center on expanding timely access to appropriate	Timeliness, Access

EQR Task/Measure	MY 2021 Recommendation	MY 2022 Finding	MY 2022 Recommendation	Standards
	<p>existing efforts in this area. CCBH’s success with securing follow-up visits post-discharge for this population—as reflected in its consistently strong performance on the HEDIS Quality Compass FUH percentiles, COVID-19 notwithstanding—is likely helping to reduce avoidable readmissions. In its current PEDTAR PIP, CCBH is planning to leverage its partnership with counties, single county authorities (SCAs), and Centers of Excellence (COE) to improve warm handoffs for initiation and engagement into specialty SUD treatment as well as improve MAT penetration rates, especially for its historically underserved African American and Hispanic members. If CCBH is able to bring about similar outcome improvements for its members with SUD, while simultaneously addressing deficiencies in its grievance and appeal system that ultimately impact quality, timeliness, and access to care, the MCO can expect to achieve at or above par performance in this important area of treatment (services). The PIP’s anti-stigma campaign, combined with provider trainings, will also help improve performance with respect to prevention.</p>	<p>significantly below (better than) the statewide REA average, including stand-outs Bedford-Somerset and Blair, both of which were well under the statewide benchmark of 11.75%.</p> <p>CCBH’s comprehensive root cause analysis of its REA underperformance identified a host of factors driving readmissions. As mentioned, in admissions interviews conducted in 2022, the majority of interviewees (55%) cited SDoH, or lack thereof, as an important factor contributing to their admission. Interviews with inpatient psychiatric facilities and CCBH care managers also point to provider staff shortages, burnout, and turnover, particularly in the wake of the COVID-19 pandemic, as critical causes of poor discharge planning and follow-through.</p>	<p>treatment that addresses the whole person. This includes training and supporting care management in motivational interviewing as part of its admissions and aftercare outreach interviews with members, as preliminary results from CCBH suggest that members engaging in these interviews have lower readmission rates.</p> <p>As with efforts to improve FUH rates, the expanded data and information should serve CCBH well in adjusting, discontinuing, and/or replacing interventions as results warrant. Critical to this will be a judicious application, based on logic models of change, of the appropriate timelines to assess before making changes.</p>	

EQR Task/Measure	MY 2021 Recommendation	MY 2022 Finding	MY 2022 Recommendation	Standards
Compliance with Medicaid Managed Care Regulations				
Availability of Services	CCBH was found partially compliant for this category based on non-compliance with the substandard requiring that Clinical/chart reviews reflect appropriate consistent application of medical necessity criteria and active care management that identify and address quality of care concerns. IPRO concurs with OMHSAS's proposed corrective action: CCBH must revise its psychological testing request form to include a dedicated space for the specific referral question to be answered through psychological testing. Consistent with MNC for psychological testing, this dedicated space should encourage the requesting provider to explain how the psychological testing is expected to answer the referral question or how the referral question could not be answered on the absence of the requested testing.	CCBH was found partially compliant for this category based on non-compliance with the substandard requiring that Clinical/chart reviews reflect appropriate, consistent application of medical necessity criteria and active care management that identify and address quality-of-care concerns.	Prior recommendations for the triennial substandard deficiencies remain until next review.	Quality, Timeliness, Access
Coordination and Continuity of Care	CCBH was found partially compliant for this category based on non-compliance with the substandard requiring that Clinical/chart reviews reflect appropriate consistent application of medical necessity criteria and active care management that identify and address quality of care concerns. IPRO concurs with OMHSAS's proposed corrective action: CCBH must revise its psychological testing request form to include a	CCBH was found partially compliant for this category based on non-compliance with the substandard requiring that Clinical/chart reviews reflect appropriate, consistent application of medical necessity criteria and active care management that identify and address quality-of-care concerns.	Prior recommendations for the triennial substandard deficiencies remain until next review.	Quality, Timeliness, Access

EQR Task/Measure	MY 2021 Recommendation	MY 2022 Finding	MY 2022 Recommendation	Standards
	<p>dedicated space for the specific referral question to be answered through psychological testing. Consistent with MNC for psychological testing, this dedicated space should encourage the requesting provider to explain how the psychological testing is expected to answer the referral question or how the referral question could not be answered on the absence of the requested testing.</p>			
<p>Coverage and Authorization of Services</p>	<p>In addition to the non-compliance with the application of medical necessity criteria substandard, CCBH was partially compliant with a substandard specifying content and intelligibility of decision notices. IPRO concurs with the following OMHSAS recommendations and CAPs:  Recommendation: CCBH should ensure that their PAs are careful in adding language like "less intensive," "less restrictive," and "severity level" to denial rationales. Medically necessary services may not be denied because another "less intensive" service is not tried. Corrective Action Plan (CAP): CCBH must ensure that denial rationales are clear and document a member's behaviors, symptoms, clinical needs and/or improvements to form the basis of a medical necessity determination without using unnecessary language that educates, instructs, or case manages.</p>	<p>CCBH was found partially compliant for this category based on non-compliance with the substandard requiring that Clinical/chart reviews reflect appropriate, consistent application of medical necessity criteria and active care management that identify and address quality-of-care concerns.</p>	<p>Prior recommendations for the triennial substandard deficiencies remain until next review.</p>	<p>Quality, Timeliness, Access</p>

EQR Task/Measure	MY 2021 Recommendation	MY 2022 Finding	MY 2022 Recommendation	Standards
Practice Guidelines	CCBH was found partially compliant for this category based on non-compliance with the substandard requiring that Clinical/chart reviews reflect appropriate consistent application of medical necessity criteria and active care management that identify and address quality of care concerns. IPRO concurs with OMHSAS's proposed corrective action: CCBH must revise its psychological testing request form to include a dedicated space for the specific referral question to be answered through psychological testing. Consistent with MNC for psychological testing, this dedicated space should encourage the requesting provider to explain how the psychological testing is expected to answer the referral question or how the referral question could not be answered on the absence of the requested testing.	CCBH was found partially compliant for this category based on non-compliance with the substandard requiring that Clinical/chart reviews reflect appropriate, consistent application of medical necessity criteria and active care management that identify and address quality-of-care concerns.	Prior recommendations for the triennial substandard deficiencies remain until next review.	Quality, Timeliness, Access
Grievance and Appeal Systems	In addition to being partially compliant with the substandard specifying content and intelligibility of decision notices, CCBH was partially compliant with the substandard requiring Grievance case files include documentation that Member rights and the Grievance process were reviewed with the Member. IPRO concurs with OMHSAS's CAP: A dated witness signature and provider plan identification number must be added to CCBH's "Authorization for	CCBH was partially compliant with a standard newly crosswalked to this category requiring that their complaint and grievance policies and procedures remain up to date with Appendix H of the agreement. CCBH was partially compliant with the substandard specifying content and intelligibility of decision notices.	IPRO concurs with OMHSAS recommendations. It is recommended that CCBH ensure that members can meet in-person for Complaint and Grievance reviews, if they choose. Several Primary Contractors noted that in-person meetings were only being offered if a member "insists." It is recommended that member consent be obtained for all those	Quality, Timeliness, Access

EQR Task/Measure	MY 2021 Recommendation	MY 2022 Finding	MY 2022 Recommendation	Standards
	Representation: Member Consent for Provider to File a Grievance" form and consistently completed to meet Appendix H requirements.		attending a Complaint or Grievance review meeting who are not fulfilling an Appendix H required role.  Prior recommendations for the triennial substandard deficiencies remain until next review.	

EQR: external quality review; MCO: managed care organization; CCBH: Community Care Behavioral Health; MY: measurement year; FUI: Follow-Up After High-Intensity Care for Substance Use Disorder; MAT-OD: Medication-Assisted Treatment for Opioid Use Disorder; MHR: Mental Health-Related Avoidable Readmissions; SAR: Substance Use Disorder-Related Avoidable Readmissions; MAT-AUD: Medication-Assisted Treatment for Alcohol Use Disorder; ITM: intervention tracking measure; RCA: root cause analysis; QIP: quality improvement plan; FQHC: federally quality health center; SUD: substance use disorder; MH: mental health; NCQA: National Committee for Quality Assurance; BHARP: Behavioral Health Alliance of Rural Pennsylvania; PA: Pennsylvania; COVID-19: 2019 novel coronavirus; VBP: value-based payment; HEDIS: Healthcare Effectiveness Data and Information Set; OMHSAS: Office of Mental Health and Substance Abuse Services; CAP: corrective action plan; MNC: Medical Necessity Criteria; PA: Physician/Psychologist Advisor.

## **VIII: Summary of Activities**

### **Validation of Performance Improvement Projects**

- CCBH successfully implemented their PEDTAR PIP for MY 2022.

### **Validation of Performance Measures**

- CCBH reported all PMs and applicable quality indicators for MY 2022.

### **Compliance with Medicaid Managed Care Regulations**

- CCBH was partially compliant with Standards, including Enrollee Rights and Protections, fully compliant with Quality Assessment and Performance Improvement Program, and partially compliant with Grievance System. As applicable, compliance review findings from RY 2022, RY 2021, and RY 2020 were used to make the determinations.

### **Validation of Network Adequacy**

- CCBH was compliant with all network adequacy standards in MY 2022, and the findings were assigned a validity rating of high confidence.

### **Quality Studies**

- For any of its members receiving ICWC services in MY 2022, CCBH covered those services under a Prospective Payment System rate.

### **MCO Responses to 2022 EQR Recommendations**

- CCBH provided a response to the opportunities for improvement issued in 2022.

### **2023 Strengths, Opportunities for Improvement, and Recommendations**

- Both strengths and opportunities for improvement were noted for CCBH in 2023 (MY 2022). The BH-MCO will be required to prepare a response in 2024 for the noted opportunities for improvement.



## References

- <sup>1</sup> Code of Federal Regulations, Title 42: Public Health. (2022, March 8). Title 42 CFR § 438.358 – Activities related to external quality review. [eCFR :: Home](#).
- <sup>2</sup> Centers for Medicare & Medicaid Services (CMS). (2023, February). *CMS external quality review (EQR) protocols* (OMB Control No. 0938-0786). Department of Health & Human Services. [CMS External Quality Review \(EQR\) Protocols \(medicaid.gov\)](#).
- <sup>3</sup> National Committee for Quality Assurance (NCQA). (2020). *HEDIS® volume 2: Technical specifications for health plans*. NCQA. [NCQA > HEDIS 2020 Volume 2 \(epub\)](#).
- <sup>4</sup> Partnership for Quality Measurement (PQM). 3400: Use of pharmacotherapy for opioid use disorder (OUD). [Use of Pharmacotherapy for Opioid Use Disorder \(OUD\) | Partnership for Quality Measurement \(p4gm.org\)](#).
- <sup>5</sup> Smith, M. W., Stocks, C., & Santora, P. B. (2015). Hospital readmission rates and emergency department visits for mental health and substance abuse conditions. *Community Mental Health Journal*, 51(2), 190–197. <https://doi.org/10.1007/s10597-014-9784-x>.
- <sup>6</sup> U.S. Department of Health & Human Services. (2016). *Facing addiction in America: The Surgeon General’s report on alcohol, drugs, and health*. [Addiction and Substance Misuse Reports and Publications | HHS.gov](#).
- <sup>7</sup> Wu, T., Jia, X., Shi, H., Niu, J., Yin, X., Xie, J., & Wang, X. (2021). Prevalence of mental health problems during the COVID-19 pandemic: A systematic review and meta-analysis. *Journal of affective disorders*, 281, 91–98. <https://doi.org/10.1016/j.jad.2020.11.117>.
- <sup>8</sup> Luke Horner, Jung Kim, Megan Dormond, Kiana Hardy, Jenna Libersky, Debra J. Lipson, Mynti Hossain, and Amanda Lechner (2020). *Behavioral Health Provider Network Adequacy Toolkit*. Baltimore, MD: Division of Managed Care Policy, Center for Medicaid and CHIP Services, CMS, U.S. Department of Health and Human Services.

## Appendix A. Required SMART Substandards Pertinent to BBA Regulations

Refer to **Table A.1** for required SMART substandards pertinent to BBA Regulations.

Table A.1: Required SMART Substandards Pertinent to BBA Regulations

BBA Category	SMART Reference	SMART Language
Assurances of Adequate Capacity and Services (Title 42 CFR § 438.207)	1.1	Updated Provider Network Report, to include the following: A completed listing of all contracted and credentialed providers; Maps to demonstrate 30 minutes (20 miles) urban, and 60 minutes (45 miles) rural access timeframes (the mileage standards is used by DOH) for each level of care; Group all providers by type of service, e.g., all outpatient providers should be listed on the same page or consecutive pages.
	1.2	100% of members are given a choice of 2 providers at each level of care within 30/60 urban/rural met
	1.4	The BH-MCO has identified and addressed any gaps in provider network (e.g., cultural, special priority, needs populations or specific services)
	1.5	The BH-MCO has notified the Department of any drop in provider network. Monitor provider turnover. Network remains open where needed
	1.6	BH-MCO must require providers to notify BH-MCO when they are at capacity or not accepting any new enrollees
Availability of Services (Title 42 CFR § 438.206, Title 42 CFR § 10(h))	1.1	Updated Provider Network Report, to include the following: A completed listing of all contracted and credentialed providers; Maps to demonstrate 30 minutes (20 miles) urban, and 60 minutes (45 miles) rural access timeframes (the mileage standards is used by DOH) for each level of care; Group all providers by type of service, e.g., all outpatient providers should be listed on the same page or consecutive pages.
	1.2	100% of members are given a choice of 2 providers at each level of care within 30/60 urban/rural met
	1.3	Provider exception report submitted and approved when choice of two providers is not given
	1.4	The BH-MCO has identified and addressed any gaps in provider network (e.g., cultural, special priority, needs populations or specific services)
	1.5	The BH-MCO has notified the Department of any drop in provider network. Monitor provider turnover. Network remains open where needed
	1.6	BH-MCO must require providers to notify BH-MCO when they are at capacity or not accepting any new enrollees
	1.7	Confirm FQHC providers
	23.1	BH-MCO has assessed if 5% requirement is applicable (see b in Standard Description)
	23.2	BH-MCO phone answering procedures provide instruction for non-English members if 5% requirement is met.
	23.3	List of oral interpreters is available for non-English speakers.
	23.4	BH-MCO has provided documentation to confirm if Oral Interpretation services were provided for the calendar year being reviewed. The documentation includes the actual number of services, by contract, that were provided. (Oral Interpretation is identified as the action of listening to something in one language and orally translating into another language.)
	23.5	BH-MCO has provided documentation to confirm if Written Translation services were provided for the calendar year being reviewed. The documentation includes the actual number of services, by contract, that were provided. (Written Translation is defined as the replacement of a written text from one language into an equivalent written text in another language.)
	24.1	BH-MCO provider application includes information about handicapped accessibility
	24.2	Provider network database contains required information for ADA compliance
24.3	BH-MCO phone answering uses TTY or PA telecommunication relay services	

BBA Category	SMART Reference	SMART Language
	24.4	BH-MCO is able to access interpreter services
	24.5	BH-MCO has the ability to accommodate people who are hard of hearing
	24.6	BH-MCO can make alternate formats available upon request
	28.1	Clinical/chart reviews reflect appropriate consistent application of medical necessity criteria and active care management that identify and address quality of care concerns
	28.2	The medical necessity decision made by the BH-MCO Physician/Psychologist Advisor is supported by documentation in the denial record and reflects appropriate application of medical necessity criteria
	93.1	The BH-MCO reports monitoring results for access to services (routine, urgent and emergent), provider network adequacy and penetration rates.
	93.2	The BH-MCO reports monitoring results for appropriateness of service authorization and inter-rater reliability.
	93.3	The BH-MCO reports monitoring results for: authorizations; complaint, grievance and appeal processes; rates of denials; and rates of grievances upheld or overturned.
	93.4	The BH-MCO reports monitoring results for treatment outcomes: readmission rates, follow up after hospitalization rates, and consumer satisfaction.
Confidentiality (Title 42 CFR § 438.224)	120.1	The County/BH-MCO uses the required reference files as evidenced through correct, complete and accurate encounter data.
	142.1	The PC/BH-MCO uses the required reference files as evidenced through correct, complete, and accurate reference information submitted on encounter data records. Diagnosis Code Files; Procedure Code Files
	144.1	98% of Professional Encounters and 95% of Institutional Encounters submitted each month must be HIPAA Compliant and submitted and approved in PROMISE™ (i.e., pass PROMISE™ edits).
	145.1	All encounters must be HIPAA Compliant and submitted and approved in PROMISE™ (i.e., pass PROMISE™ edits) within 90 days following the date that the BH-MCO paid/adjudicated the provider's claim or encounter.
Coordination and Continuity of Care (Title 42 CFR § 438.208)	28.1	Clinical/chart reviews reflect appropriate consistent application of medical necessity criteria and active care management that identify and address quality of care concerns
	28.2	The medical necessity decision made by the BH-MCO Physician/Psychologist Advisor is supported by documentation in the denial record and reflects appropriate application of medical necessity criteria
Coverage and Authorization of Services (Title 42 CFR § 438.210(a-e), Title 42 CFR 440.230, Title 42 CFR § 441, Subpart B)	28.1	Clinical/chart reviews reflect appropriate consistent application of medical necessity criteria and active care management that identify and address quality of care concerns
	28.2	The medical necessity decision made by the BH-MCO Physician/Psychologist Advisor is supported by documentation in the denial record and reflects appropriate application of medical necessity criteria
	72.1	Denial notices are issued to members according to required timeframes and use the required template language
	72.2	The content of the notices adhere to OMHSAS requirements (e.g., easy to understand and free from medical jargon; contains explanation of member rights and procedures for filing a grievance, requesting a DHS Fair Hearing, and continuation of services; contains name of contact person; contains specific member demographic information; contains specific reason for denial; contains detailed description of requested services, denied services, and any approved services if applicable; contains date denial decision will take effect).

BBA Category	SMART Reference	SMART Language
Disenrollment Requirements and Limitations (Title 42 CFR § 438.56)	120.1	The County/BH-MCO uses the required reference files as evidenced through correct, complete and accurate encounter data.
Emergency and Post-Stabilization Services (Title 42 CFR § 438.114)	72.2	The content of the notices adhere to OMHSAS requirements (e.g., easy to understand and free from medical jargon; contains explanation of member rights and procedures for filing a grievance, requesting a DHS Fair Hearing, and continuation of services; contains name of contact person; contains specific member demographic information; contains specific reason for denial; contains detailed description of requested services, denied services, and any approved services if applicable; contains date denial decision will take effect).
	91.3	The QM Program Description includes the following basic elements: <ul style="list-style-type: none"> <li>a. Performance improvement projects</li> <li>b. Collection and submission of performance measurement data</li> <li>c. Mechanisms to detect underutilization and overutilization of services</li> <li>d. Emphasis on, but not limited to, high-volume/high-risk services and treatment, such as IBHS.</li> <li>e. Mechanisms to assess the quality and appropriateness of care furnished to enrollees with special health needs</li> </ul>
	91.5	The QM Work Plan outlines the specific activities related to coordination and interaction with other entities, including but not limited to, Physical Health MCO's (PH-MCO).
	91.7	The QM Work Plan includes the specific monitoring activities conducted to evaluate the effectiveness of the services received by members: <ul style="list-style-type: none"> <li>a. Access to services (routine, urgent and emergent), provider network adequacy, and penetration rates.</li> <li>b. Appropriateness of service authorizations and inter-rater reliability.</li> <li>c. Complaint, grievance and appeal processes; denial rates; and upheld and overturned grievance rates.</li> <li>d. Treatment outcomes: readmission rate, follow-up after hospitalization rates, initiation and engagement rates, and consumer satisfaction.</li> </ul>
	91.9	The QM Work Plan includes the specific monitoring activities conducted to evaluate access and availability to services: <ul style="list-style-type: none"> <li>a. Telephone access and responsiveness rates</li> <li>b. Overall utilization patterns and trends including IBHS and other high-volume/high-risk services</li> </ul>
Enrollee Rights Requirements (Title 42 CFR § 438.100)	11.2	100% of new providers have received orientation, including member rights and protection.
	24.3	BH-MCO phone answering uses TTY or PA telecommunication relay services
	24.4	BH-MCO is able to access interpreter services
	24.5	BH-MCO has the ability to accommodate people who are hard of hearing
	24.6	BH-MCO can make alternate formats available upon request
	72.2	The content of the notices adhere to OMHSAS requirements (e.g., easy to understand and free from medical jargon; contains explanation of member rights and procedures for filing a grievance, requesting a DHS Fair Hearing, and continuation of services; contains name of contact person; contains specific member demographic information; contains specific reason for denial; contains detailed description of requested services, denied services, and any approved services if applicable; contains date denial decision will take effect).

BBA Category	SMART Reference	SMART Language
Health Information Systems (Title 42 C.F.R. § 438.242)	120.1	The County/BH-MCO uses the required reference files as evidenced through correct, complete and accurate encounter data.
	141.1	BH-MCO has met the Department's standards of clean claims each of the 12 months: 90% @ 30 days, 100% @ 45 days
	142.1	The PC/BH-MCO uses the required reference files as evidenced through correct, complete, and accurate reference information submitted on encounter data records. Diagnosis Code Files; Procedure Code Files
	143.1	The PC/BH-MCO uses the required provider files as evidenced through correct, complete, and accurate provider information submitted on encounter data records. PRV 414; PRV 415; PRV 430; PRV 435; PRV 720
	144.1	98% of Professional Encounters and 95% of Institutional Encounters submitted each month must be HIPAA Compliant and submitted and approved in PROMISE™ (i.e., pass PROMISE™ edits).
	145.1	All encounters must be HIPAA Compliant and submitted and approved in PROMISE™ (i.e., pass PROMISE™ edits) within 90 days following the date that the BH-MCO paid/adjudicated the provider's claim or encounter.
Practice Guidelines (Title 42 CFR § 438.236)	28.1	Clinical/chart reviews reflect appropriate consistent application of medical necessity criteria and active care management that identify and address quality of care concerns
	28.2	The medical necessity decision made by the BH-MCO Physician/Psychologist Advisor is supported by documentation in the denial record and reflects appropriate application of medical necessity criteria
	93.1	The BH-MCO reports monitoring results for access to services (routine, urgent and emergent), provider network adequacy and penetration rates.
	93.2	The BH-MCO reports monitoring results for appropriateness of service authorization and inter-rater reliability.
	93.3	The BH-MCO reports monitoring results for: authorizations; complaint, grievance and appeal processes; rates of denials; and rates of grievances upheld or overturned.
	93.4	The BH-MCO reports monitoring results for treatment outcomes: readmission rates, follow up after hospitalization rates, and consumer satisfaction.
	10.1	100% of credentialed files should contain licensing or certification required by PA law, verification of enrollment in the MA and/or Medicare program with current MA provider agreement, malpractice/liability insurance, disclosure of past or pending lawsuits or litigation, board certification or edibility BH-MCO onsite review, as applicable.
	10.2	100% of decisions made within 180 days of receipt of application
	10.3	Recredentialing incorporates results of provider profiling
Provider Selection (Title 42 CFR § 438.214)	10.1	100% of credentialed files should contain licensing or certification required by PA law, verification of enrollment in the MA and/or Medicare program with current MA provider agreement, malpractice/liability insurance, disclosure of past or pending lawsuits or litigation, board certification or edibility BH-MCO onsite review, as applicable.
	10.2	100% of decisions made within 180 days of receipt of application
	10.3	Recredentialing incorporates results of provider profiling
Subcontractual Relationships and Delegation (Title 42 CFR § 438.230)	99.1	The BH-MCO reports monitoring results for quality of individualized service plans and treatment planning
	99.2	The BH-MCO reports monitoring results for adverse incidents
	99.3	The BH-MCO reports monitoring results for collaboration and cooperation with member complaints, grievance and appeal procedures, as well as other medical and human services programs
	99.4	The BH-MCO reports monitoring results for administrative compliance

BBA Category	SMART Reference	SMART Language
	99.5	The BH-MCO has implemented a provider profiling process which includes performance measures, baseline thresholds and performance goals
	99.6	Provider profiles and individual monitoring results are reviewed with providers
	99.7	Providers are evaluated based on established goals and corrective action taken as necessary
	99.8	The BH-MCO demonstrates that provider profiling results are incorporated into the network management strategy
Quality Assessment and Performance Improvement Program (Title 42 CFR § 438.330)	91.1	The QM Program Description clearly outlines the BH-MCO QM structure
	91.2	The QM Program Description clearly outlines the BH-MCO QM content.
	91.3	<p>The QM Program Description includes the following basic elements:</p> <ul style="list-style-type: none"> <li>a. Performance improvement projects</li> <li>b. Collection and submission of performance measurement data</li> <li>c. Mechanisms to detect underutilization and overutilization of services</li> <li>d. Emphasis on, but not limited to, high-volume/high-risk services and treatment, such as IBHS.</li> <li>e. Mechanisms to assess the quality and appropriateness of care furnished to enrollees with special health needs</li> </ul>
	91.4	<p>The QM Work Plan includes:</p> <ul style="list-style-type: none"> <li>a. Objective</li> <li>b. Aspect of care/service</li> <li>c. Scope of activity</li> <li>d. Frequency</li> <li>e. Data source</li> <li>f. Sample size</li> <li>g. Responsible person</li> <li>h. Specific, measurable, attainable, realistic and timely performance goals, as applicable</li> </ul>
	91.5	The QM Work Plan outlines the specific activities related to coordination and interaction with other entities, including but not limited to, Physical Health MCO's (PH-MCO).
	91.6	The QM Work Plan outlines the formalized collaborative efforts (joint studies) to be conducted.
	91.7	<p>The QM Work Plan includes the specific monitoring activities conducted to evaluate the effectiveness of the services received by members:</p> <ul style="list-style-type: none"> <li>a. Access to services (routine, urgent and emergent), provider network adequacy, and penetration rates.</li> <li>b. Appropriateness of service authorizations and inter-rater reliability.</li> <li>c. Complaint, grievance and appeal processes; denial rates; and upheld and overturned grievance rates.</li> <li>d. Treatment outcomes: readmission rate, follow-up after hospitalization rates, initiation and engagement rates, and consumer satisfaction.</li> </ul>
	91.8	The QM Work Plan includes a provider profiling process.
	91.9	<p>The QM Work Plan includes the specific monitoring activities conducted to evaluate access and availability to services:</p> <ul style="list-style-type: none"> <li>a. Telephone access and responsiveness rates</li> <li>b. Overall utilization patterns and trends including IBHS and other high-volume/high-risk services</li> </ul>
	91.10	<p>The QM Work Plan includes monitoring activities conducted to evaluate the quality and performance of the provider network:</p> <ul style="list-style-type: none"> <li>a. Quality of individualized service plans and treatment planning</li> <li>b. Adverse incidents</li> </ul>

BBA Category	SMART Reference	SMART Language
		c. Collaboration and cooperation with member complaints, grievance, and appeal procedures as well as other medical and human services programs and administrative compliance
	91.11	The QM Work Plan includes a process for determining provider satisfaction with the BH-MCO
	91.12	<p>The QM Work Plan addresses PA-specific, HEDIS and other performance measures, as applicable:</p> <ul style="list-style-type: none"> <li>a. Pay-for-Performance Appendix GG of PS&amp;R – PA-specific and HEDIS FUH 7-day and 30-day and REA within 30 days of discharge</li> <li>b. EQRO Annual Technical Report (ATR) identification of Opportunities For Improvement (OFI) for Follow up After Mental Health Hospitalization (FUH) – BH-MCO should address EQRO’s identification of OFI in their Annual Workplan and Annual Evaluation</li> <li>c. QM Annual Evaluation</li> </ul>
	91.13	<p>The identified performance improvement projects must include the following:</p> <ul style="list-style-type: none"> <li>a. Measurement of performance using objective quality indicators</li> <li>b. Implementation of system interventions to achieve improvement in quality</li> <li>c. Evaluation of the effectiveness of the interventions</li> <li>d. Planning and initiation of activities for increasing or sustaining improvement</li> <li>e. Timeline for reporting status and results of each project to the Department of Human Services (DHS)</li> <li>f. Completion of each performance Improvement project in a reasonable time period to allow information on the success of performance improvement projects to produce new information on quality of care each year</li> </ul>
	91.14	The QM Work Plan outlines other performance improvement activities to be conducted based on the findings of the Annual Evaluation and any Corrective Actions required from previous reviews
	91.15	The Annual Program Evaluation evaluates the impact and effectiveness of the BH-MCO’s quality management program. It includes an analysis of the BH-MCO’s internal QM processes and initiatives, as outlined in the program description and the work plan.
	93.1	The BH-MCO reports monitoring results for access to services (routine, urgent and emergent), provider network adequacy and penetration rates.
	93.2	The BH-MCO reports monitoring results for appropriateness of service authorization and inter-rater reliability.
	93.3	The BH-MCO reports monitoring results for: authorizations; complaint, grievance and appeal processes; rates of denials; and rates of grievances upheld or overturned.
	93.4	The BH-MCO reports monitoring results for treatment outcomes: readmission rates, follow up after hospitalization rates, and consumer satisfaction.
	98.1	The BH-MCO reports monitoring results for telephone access standard and responsiveness rates. Standard: Abandonment rate < 5%, average speed of answer < 30 seconds.
	98.2	The BH-MCO reports monitoring results for overall utilization patterns and trends, including IBHS service utilization and other high-volume/high-risk services patterns of over- or under-utilization. BH-MCO takes action to correct utilization problems, including patterns of over- and under-utilization.
	98.3	The BH-MCO reports monitoring results for coordination with other service agencies and schools
	100.1	The BH-MCO assesses provider satisfaction with network management; specifically: claims processing, provider relations, credentialing, prior authorization, service management and quality management

BBA Category	SMART Reference	SMART Language
	104.1	The BH-MCO must measure and report its performance using standard measures required by DHS
	104.2	The BH MCO must submit data to DHS, as specified by DHS, that enables the measurement of the BH-MCO's performance. QM program description must outline timeline for submission of QM program description, work plan, annual QM summary/evaluation, and member satisfaction including Consumer Satisfaction Team reports to DHS.
	104.3	Performance Improvement Plans status reported within the established time frames
	104.4	The BH-MCO submitted the following within established timeframes: Annual Evaluation QM Program Description QM Work Plan Quarterly SMART Reports
	108.2	C/FST budget is sufficient to: hire staff proportionate to HealthChoices covered lives; have adequate office space; purchase equipment; travel and attend on-going training.
	108.5	The C/FST has access to providers and HealthChoices members to conduct surveys, and employs a variety of survey mechanisms to determine member satisfaction; e.g., provider specific reviews, mailed surveys, focus meetings, outreach to special populations, etc.
	108.6	The problem resolution process specifies the role of the County, BH-MCO, C/FST and providers, and results in timely follow-up of issues identified in quarterly surveys.
	108.7	The C/FST quarterly reports submitted to OMHSAS include the numeric results of surveys by provider and level of care, and narrative information about trends and actions taken on behalf of individual consumers, with providers, and systemic issues, as applicable.
	108.8	The annual mailed/telephonic survey results are representative of HealthChoices membership, and identify systemic trends. Actions have been taken to address areas found deficient, as applicable.
	108.10	The C/FST Program is an effective, independent organization that is able to identify and influence quality improvement on behalf of individual members and system improvement.
Grievance and Appeal Systems (Title 42 CFR § 438.228)	60.1	Table of organization identifies lead person responsible for overall coordination of Complaint and Grievance process and adequate staff to receive, process and respond to member Complaints and Grievances.
	60.2	Training rosters and training curriculums identify that Complaint and Grievance staff has been adequately trained on Member rights related to the processes and how to handle and respond to member Complaints and Grievances.
	60.3	The BH-MCO's Complaint and Grievance policies and procedures comply with the requirements set forth in Appendix H.
	68.1	Interview with Complaint Coordinator(s) demonstrate a clear understanding of the Complaint process including how Member rights and Complaint procedures are made known to Members, BH-MCO staff and the provider network. <ul style="list-style-type: none"> <li>• 1st level</li> <li>• 2nd level</li> <li>• External</li> <li>• Expedited</li> </ul> Fair Hearing
	68.2	<ul style="list-style-type: none"> <li>• Interview with the Complaint Manager(s) demonstrates effective oversight of the Complaint process.</li> </ul>
	68.3	100% of Complaint Acknowledgement and Decision letters reviewed adhere to the established time lines. The required letter templates are utilized 100% of the time.



BBA Category	SMART Reference	SMART Language
	68.4	Complaint Acknowledgement and Decision letters must be written in clear, simple language that includes each issue identified in the Member's Complaint and a corresponding explanation and reason for the decision(s).
	68.7	Complaint case files include documentation that Member rights and the Complaint process were reviewed with the Member.
	68.9	Complaint case files include documentation of any referrals of Complaint issues to Primary Contractor/BH-MCO committees for further review and follow-up. Evidence of subsequent corrective action and follow-up by the respective Primary Contractor/BH-MCO Committee must be available to the Complaint staff, either by inclusion in the Complaint case file or reference in the case file to where the documentation can be obtained for review.
	71.1	Interview with Grievance Coordinator demonstrates a clear understanding of the Grievance process, including how Grievance rights and procedures are made known to Members, BH-MCO staff and the provider network: <ul style="list-style-type: none"> <li>• Internal</li> <li>• External</li> <li>• Expedited Fair Hearing</li> </ul>
	71.2	<ul style="list-style-type: none"> <li>• Interview with the Grievance Manager(s) demonstrates effective oversight of the Grievance process.</li> </ul>
	71.3	100% of Grievance Acknowledgement and Decision letters reviewed adhere to the established time lines. The required letter templates are utilized 100% of the time.
	71.4	Grievance decision letters must be written in clear, simple language that includes a statement of all services reviewed and a specific explanation and reason for the decision including the medical necessity criteria utilized.
	71.7	Grievance case files include documentation that Member rights and the Grievance process were reviewed with the Member.
	71.9	Grievance case files must include documentation of any referrals to Primary Contractor/BH-MCO committees for further review and follow-up. Evidence of subsequent corrective action and follow-up by the respective Primary Contractor/BH-MCO Committee must be available to the Grievance staff either by inclusion in the Grievance case file or reference in the case file as to where the documentation can be obtained for review.
	72.1	Denial notices are issued to members according to required timeframes and use the required template language
	72.2	The content of the notices adhere to OMHSAS requirements (e.g., easy to understand and free from medical jargon; contains explanation of member rights and procedures for filing a grievance, requesting a DHS Fair Hearing, and continuation of services; contains name of contact person; contains specific member demographic information; contains specific reason for denial; contains detailed description of requested services, denied services, and any approved services if applicable; contains date denial decision will take effect).

SMART: Systematic Monitoring, Access, and Retrieval Technology; BBA: Balanced Budget Act; CFR: Code of Federal Regulations; §: section; DOH: Department of Health; BH: behavioral health; MCO: managed care organization; PH: physical health; FQHC: federally qualified health center; PC: Primary Contractor; HIPAA: Health Insurance Portability and Accountability Act; OMHSAS: Office of Mental Health and Substance Abuse Services; DHS: Department of Human Services; QM: quality management; HEDIS: Healthcare Effectiveness Data and Information Set; PS&R: Program Standards and Requirements; EQRO: external quality review organization; ADA: Americans with Disabilities Act; TTY: teletype; IBHS : intensive behavioral health services; MA: Medicaid; C/FST: Consumer/Family Satisfaction Team.

## Appendix B. OMHSAS-Specific SMART Substandards

Refer to **Table B.1** for OMHSAS-specific SMART substandards.

Table B.1: OMHSAS-Specific SMART Substandards

Category	SMART Reference	SMART Language
<b>Care Management</b>		
Care Management (CM) Staffing	27.1	BH-MCO has staffing standard for the number of care managers needed.
Care Management (CM) Staffing	27.2	Current staffing pattern is in compliance with the stated standard.
Care Management (CM) Staffing	27.3	BH-MCO care management staff represents specialty area of mental health, drug and alcohol, child and adult, and experience in the field.
Care Management (CM) Staffing	27.4	BH-MCO has a staffing standard for the number of physician and peer reviews needed.
Care Management (CM) Staffing	27.5	Current staffing pattern is in compliance with the stated standard.
Care Management (CM) Staffing	27.6	Physician and peer reviews represent specialty areas of mental health, drug and alcohol, child and adults, and experience in field.
Care Management (CM) Staffing	27.7	Other: Significant onsite review findings related to Standard 27
Longitudinal Care Management (and Care Management Record Review)	28.3	Other: Significant onsite review findings related to Standard 28
<b>Complaints and Grievances</b>		
Complaints	68.5	A verbatim transcript and/or recording of the second level Complaint review meeting is maintained to demonstrate appropriate representation, adherence to the Complaint review meeting process, familiarity with the issues being discussed and that the decision was based on input from all panel members.
Complaints	68.6	Sign-in sheets are included for each Complaint review meeting that document the meeting date and time, each participant's name, affiliation, job title, role in the meeting, signature ( facilitator documents participant's virtual attendance if they are not present to sign) and acknowledgement of the confidentiality requirement. Member consent is documented on the sign-in sheet or elsewhere in the complaint case record for participants that require member consent.
Complaints	68.8	Complaint case files include Member and provider contacts related to the Complaint case, investigation notes and evidence, Complaint review summary and identification of all review committee participants, including name, affiliation, job title and role.
Complaints	68.1.1	Where applicable there is evidence of Primary Contractor oversight and involvement in the Complaint process, including, but not limited to: the Member Handbook, Complaint decisions, written notification letters, investigations, scheduling of reviews, staff trainings, adherence of review committees to the requirements in Appendix H and quality of care concerns.
Complaints	68.1.2	Training rosters and training curriculums demonstrate that Complaint staff, as appropriate, have been adequately trained on Member rights related to the processes and how to handle and respond to Member Complaints.

Category	SMART Reference	SMART Language
Grievances	71.5	A verbatim transcript and/or recording of the Grievance review meeting is maintained to demonstrate appropriate representation, adherence to the Grievance review meeting process, familiarity with the issues being discussed and that input was provided from all panel members.
Grievances	71.6	Sign-in sheets are included for each Grievance review meeting that document the meeting date and time, each participant's name, affiliation, job title, role in the meeting, signature (facilitator documents participant's virtual attendance if they are not present to sign) and acknowledgement of the confidentiality requirement. Member consent is documented on the sign-in sheet or elsewhere in the complaint case record for participants that require member consent.
Grievances	71.8	Grievance case files include Member and provider contacts related to the Grievance case, Grievance review summary and identification of all review committee participants, including name, affiliation, job title and role.
Grievances	71.1.1	Where applicable there is evidence of Primary Contractor oversight and involvement in the Grievance process, included but not limited to the Member Handbook, Grievance decisions, written notification letters, scheduling of reviews, staff trainings, adherence of review committees to the requirements in Appendix H and quality of care concerns.
Grievances	71.1.2	Training rosters and training curriculums demonstrate that Grievance staff, as appropriate, have been adequately trained on Member rights related to the processes and how to handle and respond to Member Grievances.
<b>Denial</b>		
Denials	72.3	BH-MCO consistently reports denial data/occurrences to OMHSAS on a monthly basis according to Appendix AA requirements.
<b>Education and Prevention Programs</b>		
Education and prevention programs	59.1	BM-MCO has implemented public education and prevention programs, including behavioral health educational materials.
<b>Enrollee Satisfaction</b>		
Consumer/Family Satisfaction	108.3	County's/BH-MCO's role of fiduciary (if applicable) is clearly defined, and provides supportive function as defined in the C/FST Contract, as opposed to directing the program.
Consumer/Family Satisfaction	108.4	The C/FST Director is responsible for: setting program direction consistent with County direction; negotiating contract; prioritizing budget expenditures; recommending survey content and priority; and directing staff to perform high quality surveys.
Consumer/Family Satisfaction	108.9	Results of surveys by provider and level of care are reflected in BH-MCO provider profiling, and have resulted in provider action to address issues identified.

Category	SMART Reference	SMART Language
Executive Management		
County Executive Management	78.1	Updated County Table of Organization – evidence of sufficient staff.
County Executive Management	78.2	Review of County/Corporation management minutes demonstrate actions taken. BH-MCO written notification of key staff changes received within seven days-watch for high turnover, vacant positions.
County Executive Management	78.3	County formal review of BH-MCO is completed on an annual basis.
County Executive Management	78.4	There is evidence of County leadership to promote recovery and resiliency.
County Executive Management	78.5	Other: Significant onsite review findings related to Standard 78.
BH-MCO Executive Management	86.1	Updated BH-MCO table of organization – evidence of sufficient staff.
BH-MCO Executive Management	86.2	OMHSAS onsite review is conducted every 3 years
BH-MCO Executive Management	86.3	Other: Significant onsite review findings related to Standard 86

SMART: Systematic Monitoring, Access, and Retrieval Technology; OMHSAS: Office of Mental Health and Substance Abuse Services; BH-MCO: behavioral health managed care organization; C/FST: Consumer/Family Satisfaction Team.

## Appendix C: OMHSAS-Specific SMART Substandards for CCBH Primary Contractors

OMHSAS-specific substandards are not required to fulfill BBA requirements. In RY 2022, 31 OMHSAS-specific substandards were evaluated for CCBH and its Primary Contractors. **Table C.1** provides a count of the OMHSAS-specific substandards applicable in 2022, along with the relevant categories.

Table C.1: Tally of OMHSAS-Specific Substandards Reviewed for CCBH

Category (SMART Standard)	Evaluated SMART Substandards <sup>1</sup>		SMART Substandards Under Active Review <sup>2</sup>		
	Total	NR	RY 2022	RY 2021	RY 2020
<b>Care Management</b>					
Care Management (CM) Staffing	7	-	0	7	0
Longitudinal CM (and CM Record Review)	1	-	0	1	0
<b>Complaints and Grievances</b>					
Complaints	5	-	0	5	0
Grievances	5	-	0	5	0
<b>Denial</b>					
Denials	1	-	1	0	0
<b>Executive Management</b>					
County Executive Management	5	-	0	5	0
BH-MCO Executive Management	3	-	0	3	0
<b>Enrollee Satisfaction</b>					
Consumer/Family Satisfaction	3	-	3	0	0
<b>Education and Prevention Programs</b>					
Education and Prevention Programs	1	-	1	0	0
<b>Total</b>	<b>31</b>	<b>-</b>	<b>5</b>	<b>26</b>	<b>0</b>

<sup>1</sup>The total number of OMHSAS-specific substandards required for the evaluation of Primary Contractor/BH-MCO compliance with OMHSAS standards. Any SMART substandards not reviewed indicate substandards that were deemed not applicable to the Primary Contractor/BH-MCO.

<sup>2</sup>The number of OMHSAS-specific substandards that came under active review during the cycle specific to the review year. OMHSAS: Office of Mental Health & Substance Abuse Services; SMART: Systematic Monitoring, Access, and Retrieval Technology; CCBH: Community Care Behavioral Health; BH-MCO: behavioral health managed care organization; RY: review year; NR: substandards not reviewed.

### Format

This document groups the monitoring standards under the subject headings Care Management, Complaints and Grievances, Denials, Executive Management, Enrollee Satisfaction, and Education and Prevention Programs. The status of each substandard is presented as it appears in the SMART Review Application (i.e., compliant, partially compliant, non-compliant) and/or applicable RAI tools (i.e., complete, pending) submitted by OMHSAS. This format reflects the goal of this supplemental review, which is to assess the Primary Contractor/BH-MCO's compliance with selected ongoing OMHSAS-specific monitoring standards.

### Findings

#### Care Management

The OMHSAS-specific SMART substandards relating to Care Management are MCO-specific review standards. Eight substandards crosswalk to this category, and CCBH and its Primary Contractors were compliant with seven substandards and not compliant with one substandard. The status for these substandards is presented in **Table C.2**.

Table C.2: OMHSAS-Specific Requirements Relating to Care Management

Category	SMART Item	RY	Status by Primary Contractor		
			Compliant	Partially Compliant	Non-compliant
Care Management					
Care Management (CM) Staffing	Substandard 27.1	2021	All CCBH Primary Contractors	-	-
	Substandard 27.2	2021	All CCBH Primary Contractors	-	-
	Substandard 27.3	2021	All CCBH Primary Contractors	-	-
	Substandard 27.4	2021	All CCBH Primary Contractors	-	-
	Substandard 27.5	2021	All CCBH Primary Contractors	-	-
	Substandard 27.6	2021	All CCBH Primary Contractors	-	-
	Substandard 27.7	2021	-	-	All CCBH Primary Contractors
Longitudinal CM (and CM Record Review)	Substandard 28.3	2021	All CCBH Primary Contractors	-	-

OMHSAS: Office of Mental Health & Substance Abuse Services; SMART: Systematic Monitoring, Access, and Retrieval Technology; RY: review year; CCBH: Community Care Behavioral Health.

All Primary Contractors associated with CCBH were non-compliant with Substandard 7 of Standard 27 (RY 2021).

**Standard 27:** Care Management (CM) Staffing. Care management staffing is sufficient to meet member needs. Appropriate supervisory staff, including access to senior clinicians (peer reviewers, physicians, etc.), is evident.

**Substandard 7:** Other: Significant onsite review findings related to Standard 27.

### Complaints and Grievances

The OMHSAS-specific SMART substandards relating to second-level complaints and grievances include MCO-specific and county-specific review standards. CCBH and its Primary Contractors were evaluated on 10 of the 10 applicable substandards. Of the 10 substandards evaluated, CCBH was compliant with six and partially compliant with four of the substandards, as indicated in **Table C.3**.

Table C.3: OMHSAS-Specific Requirements Relating to Complaints and Grievances

Category	SMART Item	RY	Status by Primary Contractor		
			Compliant	Partially Compliant	Non-compliant
Complaints and Grievances					
Complaints	Substandard 68.1.1	2021	Allegheny County, BHARP, Behavioral Health Services of Somerset & Bedford Counties, Berks County, Blair HealthChoices, Erie County, Lycoming-Clinton Joinder Board, York-Adams HealthChoices Joinder Governing Board	Carbon-Monroe-Pike Joinder Board, Chester County, NBHCC	-
	Substandard 68.1.2	2021	All CCBH Primary Contractors	-	-
	Substandard 68.5	2021	All CCBH Primary Contractors	-	-
	Substandard 68.6	2021	-	All CCBH Primary Contractors	-
	Substandard 68.8	2021	All CCBH Primary Contractors	-	-
Grievances	Substandard 71.1.1	2021	Allegheny County, BHARP, Behavioral Health Services of Somerset & Bedford Counties, Berks County, Blair HealthChoices, Erie County, Lycoming-Clinton Joinder Board, York-Adams HealthChoices Joinder Governing Board	Carbon-Monroe-Pike Joinder Board, Chester County, NBHCC	-
	Substandard 71.1.2	2021	All CCBH Primary Contractors	-	-
	Substandard 71.5	2021	All CCBH Primary Contractors	-	-
	Substandard 71.6	2021	-	-	All CCBH Primary Contractors
	Substandard 71.8	2021	All CCBH Primary Contractors	-	-

OMHSAS: Office of Mental Health & Substance Abuse Services; SMART: Systematic Monitoring, Access, and Retrieval Technology; RY: review year; CCBH: Community Care Behavioral Health; BHARP: Behavioral Health Alliance of Rural Pennsylvania; NBHCC: Northeast Behavioral Health Care Consortium, Inc.

Carbon-Monroe-Pike, Chester, and NBHCC were partially compliant on Substandard 1 of Standard 68.1 (RY 2021).

**Standard 68.1:** The Primary Contractor is responsible for monitoring the Complaint process for compliance with Appendix H and the Systematic Monitoring, Access and Retrieval Technology (SMART).

**Substandard 68.1.1:** Where applicable there is evidence of Primary Contractor oversight and involvement in the Complaint process, including, but not limited to: The Member Handbook, Complaint decisions, written notification letters, investigations, scheduling of reviews, staff trainings, adherence of review committees to the requirements in Appendix H and quality of care concerns.

All Primary Contractors associated with CCBH were partially compliant with Substandard 6 of Standard 68 (RY 2021).

**Standard 68:** The Complaint and Fair Hearing processes, procedures and Member rights related to the processes are made known to Members, BH-MCO staff and the provider network through manuals, training, handbooks, etc.

**Substandard 68.6:** Sign-in sheets are included for each Complaint review meeting that document the meeting date and time, each participant's name, affiliation, job title, role in the meeting, signature (facilitator documents participant's virtual attendance if they are not present to sign) and acknowledgement of the confidentiality requirement. Member consent is documented on the sign-in sheet or elsewhere in the complaint case record for participants that require member consent.

Carbon-Monroe-Pike, Chester, and NBHCC were partially compliant on Substandard 1 of Standard 71.1 (RY 2021).

**Standard 71.1:** The Primary Contractor is responsible for monitoring the Grievance process for compliance with Appendix H and the Systematic Monitoring, Access and Retrieval Technology (SMART).

**Substandard 71.1.1:** Where applicable there is evidence of Primary Contractor oversight and involvement in the Grievance process, included but not limited to the Member Handbook, Grievance decisions, written notification letters, scheduling of reviews, staff trainings, adherence of review committees to the requirements in Appendix H and quality of care concerns.

All Primary Contractors associated with CCBH were not compliant with Substandard 6 of Standard 71 (RY 2021).

**Standard 71:** The Grievance and Fair Hearing processes, procedures and Member rights related to the processes are made known to Members, BH-MCO staff and the provider network through manuals, training, handbooks, etc.

**Substandard 71.6:** Sign-in sheets are included for each Grievance review meeting that document the meeting date and time, each participant's name, affiliation, job title, role in the meeting, signature (facilitator documents participant's virtual attendance if they are not present to sign) and acknowledgement of the confidentiality requirement. Member consent is documented on the sign-in sheet or elsewhere in the complaint case record for participants that require member consent.

## Denials

The OMHSAS-specific SMART substandard relating to Denials is an MCO-specific review standard. CCBH and its Primary Contractors were evaluated for and met the criteria of this substandard. The status for this substandard is presented in **Table C.4**.

Table C.4: OMHSAS-Specific Requirements Relating to Denials

Category	SMART Item	RY	Status by Primary Contractor		
			Compliant	Partially Compliant	Non-compliant
Denials					
Denials	Substandard 72.3	2022	All CCBH Primary Contractors	-	-

OMHSAS: Office of Mental Health & Substance Abuse Services; SMART: Systematic Monitoring, Access, and Retrieval Technology; RY: review year; CCBH: Community Care Behavioral Health.



## Executive Management

There are eight OMHSAS-specific SMART substandards relating to Executive Management. CCBH and its Primary Contractors were partially compliant with two substandards and non-compliant with one substandard in County Executive Management. CCBH and its Primary Contractors were non-compliant in one substandard of BH-MCO Executive Management. The status for these substandards is presented in **Table C.5**.

Table C.5: OMHSAS-Specific Requirements Relating to Executive Management

Category	SMART Item	RY	Status by Primary Contractor		
			Compliant	Partially Compliant	Non-compliant
Executive Management					
County Executive Management	Substandard 78.1	2021	Allegheny County, Behavioral Health Services of Somerset & Bedford Counties, Berks County, Blair HealthChoices, Carbon-Monroe-Pike Joinder Board, Chester County, Erie County, Lycoming-Clinton Joinder Board, NBHCC, York-Adams HealthChoices Joinder Governing Board	BHARP	-
	Substandard 78.2	2021	All CCBH Primary Contractors	-	-
	Substandard 78.3	2021	All CCBH Primary Contractors	-	-
	Substandard 78.4	2021	All CCBH Primary Contractors	-	-
	Substandard 78.5	2021	-	Allegheny County, Erie County	BHARP, Behavioral Health Services of Somerset & Bedford Counties, Berks County, Blair HealthChoices, Carbon-Monroe-Pike Joinder Board, Chester County, Lycoming-Clinton Joinder Board, NBHCC, York-Adams HealthChoices Joinder Governing Board

Category	SMART Item	RY	Status by Primary Contractor		
			Compliant	Partially Compliant	Non-compliant
BH-MCO Executive Management	Substandard 86.1	2021	All CCBH Primary Contractors	-	-
	Substandard 86.2	2021	All CCBH Primary Contractors	-	-
	Substandard 86.3	2021	-	-	All CCBH Primary Contractors

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BHARP was partially compliant with Substandard 1 of Standard 78 (RY 2021).

**Standard 78:** Evidence exists of the County's oversight of functions and activities delegated to the BH-MCO.

**Substandard 78.1:** Updated County Table of Organization - Evidence of sufficient staff.

Two Primary Contractors associated with CCBH (Allegheny and Erie) were partially compliant with Substandard 5 of Standard 78 (RY 2021), and the rest of the CCBH contractors were non-compliant.

**Standard 78:** See Standard description and determination of compliance under County Executive Management.

**Substandard 78.5:** Other: Significant onsite review findings related to Standard 78.

All Primary Contractors associated with CCBH were non-compliant with Substandard 3 of Standard 86 (RY 2021).

**Standard 86:** Required duties and functions are in place. The BH-MCO Table of Organization depicts relationships between the following functions/positions:

- Chief Executive Officer
- The appointed Medical Director is a board-certified psychiatrist licensed in Pennsylvania with at least five years of experience in MH and SA
- Chief Financial Officer
- Director of Quality Management
- Director of Utilization Management
- Management Information Systems
- Director of Prior/Service Authorization
- Director of Member Services
- Director of Provider Services

**Substandard 3:** Other: Significant onsite review findings related to Standard 86.

### Enrollee Satisfaction

The OMHSAS-specific SMART substandards relating to Enrollee Satisfaction are county-specific review standards. CCBH and its Primary Contractors were compliant on all three substandards. The status by Primary Contractor for these is presented in **Table C.6**.

Table C.6: OMHSAS-Specific Requirements Relating to Enrollee Satisfaction

Category	SMART Item	RY	Status by Primary Contractor		
			Compliant	Partially Compliant	Non-compliant
Enrollee Satisfaction					
Consumer/Family Satisfaction	Substandard 108.3	2022	All CCBH Primary Contractors	-	-
	Substandard 108.4	2022	All CCBH Primary Contractors	-	-
	Substandard 108.9	2022	All CCBH Primary Contractors	-	-

OMHSAS: Office of Mental Health & Substance Abuse Services; SMART: Systematic Monitoring, Access, and Retrieval Technology; RY: review year; CCBH: Community Care Behavioral Health.

### Education and Prevention Programs

The OMHSAS-specific SMART substandard relating to Education and Prevention Programs is MCO-specific. CCBH and its Primary Contractors were compliant on the substandard. The status by Primary Contractor is presented in **Table C.7**.

Table C.7: OMHSAS-Specific Requirements Relating to Education and Prevention Programs

Category	SMART Item	RY	Status by Primary Contractor		
			Compliant	Partially Compliant	Non-compliant
Education and Prevention Programs					
Education and Prevention Programs	Substandard 59.1	2022	All CCBH Primary Contractors	-	-

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