

# **Critical Access Behavioral Health Agency (CABHA)**

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**Joint Legislative Oversight Committee on  
Mental Health, Developmental Disabilities,  
and Substance Abuse Services**

**December 9, 2009**

**Michael Watson  
Assistant Secretary for MH/DD/SAS Development  
Department of Health and Human Services**



# **GOALS:**

## **CABHA IMPLEMENTATION**

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- To ensure that mental health and substance abuse services are delivered within a clinically sound provider organization with appropriate medical oversight.
- Move the system over time to a more comprehensive and coherent service delivery model
- Increase economies of scale and efficiencies in the service system
- Increase consumer/family/stakeholder confidence in our provider network



## **GOALS:**

# **CABHA IMPLEMENTATION CONT'D**

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- Reduce clinical fragmentation—Reduction of “Stand Alone” service delivery
- Increase provider “1<sup>st</sup> Responder” capacity
- Embed case management in comprehensive clinical provider
- Insure that consumers have access to an array of appropriate clinical services
- Increase accountability within the MH/SA service system—monitor service and referral patterns
- Provide a competent clinical platform on which to implement best practice service models

# Basic CABHA Service Requirements

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- **Services that must be delivered within the CABHA structure:**
  - Community Support Team (CST), Intensive In-Home (IIH), Day Treatment (Effective July 1, 2010)
  - New Services: Case Management/Peer Support subject to CMS approval to be approved by CMS

# To Be or Not to Be CABHA

- **Not all agencies will need to pursue CABHA certification:**

- Agency does not provide CST, IIH, or Day Treatment services or does not want to provide case management or peer support
- Agency provides a specialized service (e.g. MST, ACTT, SAIOP, PSR-Clubhouse, residential services) and does not need to provide Case Management or Peer Support
- Services for Developmentally Disabled consumers not included under CABHA certification requirement

# CABHA Certification Process

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- Provider Attestation Letter w/documentation
- Desk reviews conducted by DMH/SA and DMA staff
- Site reviews conducted by
  - DMH/SA staff
  - DMA staff
  - Licensed clinicians from LMEs (including a Medical Director)

**\*\*NOTE: Certification Process began December 1, 2009**

# CABHA Certification Requirements

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- Must provide the **core** services of:
  - Comprehensive Clinical Assessment
  - Medication Management
  - Outpatient Therapy
  
- Must deliver at least two enhanced services in the same location where it provides the three core services to create a continuum of care

# CABHA Certification Requirements

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- **Active National Accreditation of at least 3 years**
- **Medical Director**
  - 100% FTE for providers serving more than 750 consumers
  - 50% FTE for providers serving less than 750
- **Clinical Director 100% FTE**
- **Quality Management/Staff Training Director 100% FTE**

**NOTE:** The clinical oversight and management functions represented by these positions must be actively in place at least two months prior to the provider receiving an onsite review for CABHA certification.



# Medical Director Qualifications

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- Education and experience with the populations served.
- If the Medical Director is a Psychiatrist or ASAM certified physician the Medical Director & Clinical Director functions may be performed by the same individual.
- Medical Director may be employee or contract function.

# Medical Director Specifications

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- May provide direct services up to 60% of budgeted time.
- **CABHAs serving more than 750 MH/SA consumers at any site other than the CABHA certification site must designate a Lead Physician for that site.**
  - Lead Physician functions under supervision and direction of the CABHA Medical Director.
- **CABHAs required to have 100% FTE Medical Director**
  - No more than two different physicians

# Medical Director Specifications

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- **CABHAs required to have 50% FTE Medical Director**
  - **No more than one physician**

**NOTE #1:** Data indicate that 16 providers are currently serving 750 or more MH/SA consumers and that 48 providers are serving between 300 and 750 MH/SA consumers. Provider consolidations may significantly impact these numbers.

**NOTE #2:** 50% Medical Director requirement designed to accommodate needs of smaller providers.

# Clinical Director Specifications

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- **Clinical Director 100% FTE**
  - May be shared by no more than two individuals on site
  - Education & experience sufficient to provide clinical direction to the staff employed by the provider agency

# Clinical Director Specifications

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- **Accepted licenses:**

- PA (with experience with population served)
- Licensed Clinical Social Worker
- Licensed Psychologist (Doctorate Level)
- Licensed Psychological Associate
- Licensed Professional Counselor
- Licensed Marriage and Family Therapist
- Mastered Degree Nurse – advanced practice only (NP, PNP, etc.)
- Licensed Clinical Addiction Specialist
- Certified Clinical Supervisor

# QM/Training Director Specifications

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- **Quality Management/Staff Training Director**
  - **One 100% FTE required to provide evidence of quality improvement activities**
  - **Bachelors Degree and three years experience or a Masters Degree and one year of experience utilizing data to support the development of a quality management program**



# BASIC CABHA REQUIREMENTS

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- Medical Oversight
- Clinical Director
- Quality Management
- Staff Training
- National Accreditation

**\*\*NOTE: Based on a single site certification, CABHAs (subject to local LME endorsement) may deliver services on a statewide basis.**

# If Not A CABHA: How To Become One?

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- Agencies can merge to become a CABHA but:
  - Current endorsed services do not transfer to new entities.
  - Any change in ownership requires re-endorsement/re-enrollment with Medicaid



# CABHA Endorsement/Contract Issues

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- CABHAs are still required to meet site specific LME endorsement standards for all enhanced services including Case Management and Peer Support
- Sign an MOA with all LMEs in which they have a service specific site endorsement
- Contract with LMEs for State funded services where appropriate

# CABHA & Primary Healthcare

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- **To ensure that the consumers behavioral health and physical health care needs are met, CABHAs will be expected to maintain close collaboration with:**
  - Primary Care Physicians
  - Public Health Departments
  - Federally Qualified Health Clinics
  - Community Care of NC

# CABHA Appeals/Withdrawal of Certification

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- **If denied CABHA certification**

- Right to appeal the decision to the Office of Administrative Hearing (OAH) within 60 days from receipt of the Review Results letter.

The procedure to file an appeal and the required forms may be obtained from [www.oah.state.nc.us](http://www.oah.state.nc.us)

- **If CABHA Certification withdrawn**

- Lose statewide ability to provide Case Management, Peer Support, CST, IHH and Day Treatment Services

# CONCLUSION

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- **CABHAs represent a critical step toward returning quality and accountability to our community service system**
- **CABHAs establish a strong clinical foundation on which to build community service capacity**
- **Need to monitor CABHA service utilization patterns and statewide consumer access/choice issues**