



BEHAVIORAL HEALTH INTEGRATION UPDATES

BEHAVIOR HEALTH INTEGRATION



Behavioral Health Integration

SB 6312 (2014)

- ▶ Integrate physical and behavioral health
- ▶ Largely focused on payment systems

HB 1388 (2017)

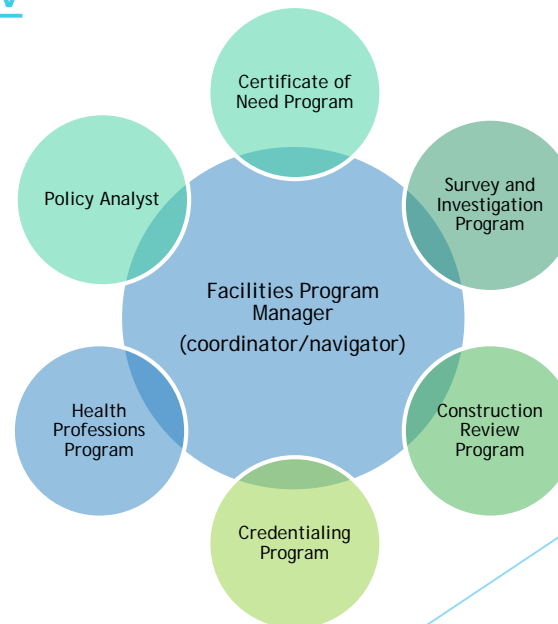
- ▶ Consolidate Department of Social and Health Services (DSHS) Division of Behavioral Health and Recovery (DBHR) into Health Care Authority (HCA)
- ▶ Move licensing and certification to DOH

Behavior Health Integration

- ▶ Date of Integration: July 1, 2018
- ▶ Staff transitions
 - ▶ 24 DSHS DBHR staff moved to DOH
 - ▶ Other DSHS DBHR moved to HCA
- ▶ Rules
 - ▶ Licensing and certification rules (“single set” rules adopted April 2018) moved from DSHS to DOH in “emergency status”
 - ▶ Contracting and other behavioral health programmatic rules moved from DSHS to HCA in “emergency status”
- ▶ DOH began licensing, certifying, and regulating about 1200 behavioral health agencies

WHAT CHANGED?

- ▶ Applications and forms ([applications/forms](#))
 - ▶ Updated to reflect DOH logo, DOH terminology, format
 - ▶ Licensing database ([Location of Provider Search](#))
 - ▶ HSQAFC@doh.wa.gov
- ▶ Internal organization



WHAT CHANGED?

▶ Processes

- ▶ Intended to keep most processes as similar to DSHS processes as possible for the first year
- ▶ Licensing and certification coordination
- ▶ Complaint processing, critical incident reporting, self-report ([Report form](#))

▶ Surveys

- ▶ All Behavior Health Agencies have a designated DOH Reviewer to help assist the agency through the survey process
- ▶ The DOH Behavior Health Survey team completes both Residential and Outpatient surveys across Washington
- ▶ DOH has developed a Policy tool that will assist agencies with meeting the requirements of WAC: [location of tool](#)

WHAT IS STILL A WORK IN PROGRESS?

- ▶ Applications and forms
 - ▶ Streamlining applications and data collection
 - ▶ Data migration and other data cleanup
 - ▶ Licensing database work
 - ▶ “Green book” updates
- ▶ Processes
 - ▶ Developing internal policies and procedures
 - ▶ Agreements with accrediting organizations
 - ▶ Survey efficiencies
 - ▶ Coordination of DOH behavioral health facilities and professions work
- ▶ Internal organization
 - ▶ Increasing staffing and support

PROJECTS AND EFFORTS



Projects and Efforts

- ▶ Communication coordination
 - ▶ Governor's Office
 - ▶ Interagency (DSHS, HCA, DOH, Dept. of Commerce, Dept. of Children, Youth and Families)
 - ▶ Intra-agency and intra-division
- ▶ Tribal attestation
- ▶ Legislative implementation
- ▶ Policy work

Tribal Attestation

- ▶ Tribes may attest to meeting state licensing and certification standards for mental health services
- ▶ Tribal consultation to add attestation for substance use disorder services and receive a license document versus a letter acknowledging attestation
- ▶ Policy statement regarding on-site survey and deeming
- ▶ Fee for attestation processing

Legislation Implementation

- ▶ 2019 session
 - ▶ Over 100 behavioral health related bills analyzed by the division
 - ▶ 13 bills passed
 - ▶ 6 workgroups
 - ▶ 2 sunrise reviews
 - ▶ Lead on 2 legislative reports
 - ▶ Rules, rules, rules...
- ▶ HB 1394- Governor's Behavioral Health Facilities bill

House Bill 1394

- ▶ Mental Health Peer Respite Centers
- ▶ Intensive Behavioral Health Treatment Facilities
- ▶ Considerations regarding services to individuals on 90-180 day civil commitment orders

- ▶ 9 month rulemaking timeline (start to implementation)
 - ▶ HCA and Commerce funding considerations
 - ▶ 5 workshops over 6 weeks
 - ▶ Project is on track!

Mental Health Peer Respite

- ▶ "Mental health peer respite center" means a peer-run program to serve individuals in need of voluntary, short-term, non-crisis services that focus on recovery and wellness.
- ▶ Services provided in a residence
 - ▶ Not required to be licensed as a residential treatment facility
- ▶ Informed by the national model
 - ▶ Peer-run
- ▶ Must be Medicaid reimbursable service
 - ▶ MHP supervision
 - ▶ Assessment and documentation

Intensive Behavioral Health Treatment

- ▶ "Intensive behavioral health treatment facility" means a community-based specialized residential treatment facility for individuals with behavioral health conditions, including individuals discharging from or being diverted from state and local hospitals, whose impairment or behaviors do not meet, or no longer meet, criteria for involuntary inpatient commitment under chapter 71.0510RCW, but whose care needs cannot be met in other community-based placement settings.
- ▶ Voluntary and long-term
- ▶ Work to clarify difference from enhanced services facility
 - ▶ Assistance with activities of daily living and primary diagnosis
- ▶ Rights
 - ▶ Similar to long-term care
 - ▶ Limited egress

90-180 Day Civil Commitment Services

- ▶ Make it easier for agencies certified for evaluation and treatment services for short-term commitments to provide services to individuals on long-term civil commitments
 - ▶ Would not require separate certification
- ▶ Considerations for required services and therapeutic environment
 - ▶ Included in HCA report to legislature for future consideration

BEHAVIOR HEALTH PROFESSIONS LEGISLATION



Senate Bill 5054

- ▶ Requires the department to establish a reciprocity program and a probationary license for psychologists, social workers, mental health counselors, marriage and family therapists, and CDPs allowing applicants with applicable license from states or jurisdiction to be eligible for a probationary license in WA.

House Bill 1768

- ▶ Changes the profession title to Substance Use Disorder Professional (SUDP), amends the definitions of the practice, reduce supervision requirements for SUDP who are seeking selected advanced licensure, reduces the amount of time a SUDP must participate in a substance use monitoring program, and changes supervision requirements for the profession.
- ▶ Create a co-occurring disorder specialist enhancement to be added to a license or registration of a psychologist, clinical social worker, marriage and family therapist, mental health counselor, or agency affiliated counselor with a master's degree or higher.

House Bill 1907

- ▶ Allows for those counselors who are participating in a substance abuse monitoring program to only have to participate for one year in order to meet the program graduation requirements.
- ▶ Prohibits Facilities that care for vulnerable adults from automatically denying employment to an applicant for as AAC position practicing as a peer counselor provided that at least one year has passed since conviction; and the offense was the result of substance abuse or untreated mental health symptoms and the applicant has been in recovery for at least one year.

House Bill 1907 & 1768 Sunrise Reviews

- ▶ Evaluate the need for creating an advanced peer counselor support specialist credential.
- ▶ Evaluate the need for a creation of a bachelor's level behavioral health professional credential.

POLICY WORK



Policy Work

- ▶ Interpretive Statements
 - ▶ Definition of “clinical supervision”
 - ▶ 2019 CDC Health Care Worker Tuberculosis Testing Guidelines
 - ▶ Mental Health Professional designation process
 - ▶ WAC 246-341 now allows agencies to attest to their own employees meeting the requirements for a mental health professional acknowledgement
- OR
- ▶ Agencies may send their completed MHP application to HSQACredentialing@doh.wa.gov and DOH will send a letter of acknowledgement

Policy Work

- ▶ Made emergency rules permanent
- ▶ Behavioral Health Agency WAC Project
 - ▶ Overhaul of behavioral health agency/facility WACs
 - ▶ Chapter 246-341- Behavioral Health Agency WAC (primary)
 - ▶ Chapter 246-337- Residential Treatment Facilities WAC
 - ▶ Chapter 246-322- Psychiatric Hospital WAC
 - ▶ Chapter 246-324- Chemical Dependency Hospital WAC

Chapter 246-341 WAC Survey

- ▶ Intent
 - ▶ Collect high-level data
 - ▶ Provide initial feedback on rules to inform the way the project is organized
- ▶ Instructions
 - ▶ Section by section(no concerns, some concerns, high-level of concerns)
 - ▶ Option to add more info
- ▶ Responses
 - ▶ Over 130 complete (answered all 109 questions!)
 - ▶ Over 720 partial (answered some/applicable questions)

WAC Survey Results

- ▶ Top 10 (*preliminary analysis)
 - ▶ 246-341-0920 - Crisis mental health services—Peer support services.
 - ▶ 246-341-0515 - Personnel—Agency staff requirements
 - ▶ 246-341-0726 - Outpatient services—Recovery support—Wraparound facilitation mental health services
 - ▶ 246-341-0200 - Behavioral health services—Definitions.
 - ▶ 246-341-0610 - Clinical—Assessment
 - ▶ 246-341-0310 - Agency licensure and certification—Deeming.
 - ▶ 246-341-0724 - Outpatient services—Recovery support—Recovery support—Peer support mental health services
 - ▶ 246-341-0640 - Clinical—Additional record content.
 - ▶ 246-341-1134 - Mental health inpatient services—Evaluation and treatment services
 - ▶ 246-341-1116 - Residential substance use disorder treatment services—Youth residential services

WAC Survey Results

- ▶ Themes based on comments:
 - ▶ Peer services
 - ▶ Documentation
 - ▶ Deeming
 - ▶ Scope of practice
 - ▶ Clinical supervision
 - ▶ Telehealth
 - ▶ Consistency between mental health and substance use disorder requirements
 - ▶ Make regulation similar to physical health regulation

BEHAVIOR HEALTH POLICY TRANSFORMATION TIERS

- ▶ Tier 1: Existing language, “nitty-gritty” clean-up
- ▶ Tier 2: Organization and efficiencies within the Behavioral Health Agency WAC chapter
- ▶ Tier 3: Organization and efficiencies within all behavioral health WAC chapters (Behavioral Health Agency, RTF, Hospitals)
 - ▶ May require legislative changes
- ▶ All work must consider impacts to Medicaid State Plan requirements

What do we do we next?

Join the discussion on October 24th!

Join the Behavioral Health GovDelivery

- ▶ To get important information about behavioral health agencies, join our GovDelivery to be notified of important information and rule-making activities.
- ▶ Select the green “Subscribe” button at the bottom of this page: <https://www.doh.wa.gov/LicensesPermitsandCertificates/FacilitiesNewReneworUpdate/BehavioralHealthAgencies> (or just search “WA DOH Behavioral Health Agencies”)
- ▶ Enter your email address, create a password, and then select Health Systems Quality Assurance (HSQA) and Behavioral Health Care Integration, along with any other topics that are of interest to you.

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