CCBHC-E NTTAC Sustainability Learning Series
Session 2: Transitioning from Grant Programs to State Certification
December 5, 2022
Acknowledgements and Disclaimer

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How to Enable Closed Captions (Live Transcript)

Next to “Live Transcript,” click the arrow button for options on closed captioning and live transcript.
How to Ask a Question

Please share questions throughout today’s session using the Q&A Feature on your Zoom toolbar.

We’ll answer as many questions as we can throughout today’s session.
Today’s Session: Slides and Recording

Slides and the session recording link will be available on the CCBHC-E NTTAC website under “Training and Events” > “Past Events” within 2 business days.
Agenda

• Welcome and logistics
• Review of agenda, learning objectives and presenters
• Understanding CCBHC State Certification
• Preparing for CCBHC State Certification
• Case Studies: Integrated Services of Kalamazoo (MI) and Western Mental Health Center (MN)
• Next Steps: Sustainability plans and actions
• Questions
Learning Objectives

• Define the current CCBHC state implementation landscape and future opportunities for clinics in state programming

• Identify strategies for using CCBHC grants to prepare for state certification
Today’s Presenters

Jane King, PsyD, LP  
Senior Consultant  
CCBHC-E NTTAC, National Council for Mental Wellbeing

Mindy Klowden, MNM  
Senior Director  
Third Horizon Strategies

Beth Ann Meints  
Integrated Services of Kalamazoo

Sarah Ackerman  
Executive Director  
Western Mental Health Center

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Understanding CCBHC Certification

• SAMHSA CCBHC-E Grant = **Attestation**
  • SAMHSA does **not** provide CCBHC certification
  • Grantees **attest** to meeting the CCBHC criteria

• State **Certification**
  • States with Centers for Medicare and Medicaid Service (CMS) approval certify clinics to operate as CCBHCs
  • Prospective CCBHCs follow their state’s certification process

**Note:** Although the [CCBHC Criteria](#) is central to certification, each state has defined their own process for certification and some state-specific certification requirements that a provider must meet to be certified as a CCBHC.
# Comparing Elements of CCBHC Funding Options

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<thead>
<tr>
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<th>SAMHSA CCBHC Grants</th>
<th>State Medicaid Funded CCBHC</th>
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<tbody>
<tr>
<td><strong>Eligibility</strong></td>
<td>Open to community-based behavioral health non-profit organizations, or organizations that are either (a) part of a local government behavioral health authority; or (b) operated under the authority of the Indian Health Service, an Indian tribe, or tribal organization; or (c) an Urban Indian Organization pursuant to a grant or contract with the Indian Health Service under Title V of the Indian Health Care Improvement Act (25 U.S.C. 1601 et seq.).</td>
<td>Open to only 10 participating demonstration states, and the state determines how and which clinics can participate.</td>
</tr>
<tr>
<td><strong>Administration Authority</strong></td>
<td>Administered by SAMHSA.</td>
<td>Administered by state Medicaid and Behavioral Health authorities within guidelines set by SAMHSA/CMS.</td>
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<tr>
<td><strong>Payment</strong></td>
<td>Grantees receive grant funds for a set period of time to implement approved services and activities and continue to bill Medicaid and other payers as usual during that period.</td>
<td>CCBHCs receive clinic-specific Medicaid payments through the <a href="#">PPS methodology</a>.</td>
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<tr>
<td><strong>Required Services</strong></td>
<td>Required to provide the scope of services provided for in the CCBHC Criteria under Program Area 4. Services should be provided directly or through established DCO partnerships, along with any additional requirements as indicated in the SAMHSA CCBHC Grant NOFO.</td>
<td>CCBHCs are required to provide a comprehensive range of services directly or through an established DCO partnership (see <a href="#">CCBHC Criteria Scope of Services 4.A – 4.K</a>).</td>
</tr>
<tr>
<td><strong>Reporting Expectations</strong></td>
<td>Required to submit IPP measures and NOMs via SPARS. For CCBHC-PDI and CCBHC-IA grantees, CCBHC clinic-level quality measures are required in the annual progress performance report starting at the end of the second grant year.</td>
<td>There are <a href="#">21 CCBHC quality measures</a>. Clinics are required to report on the required clinic-reported measures, while states report on the state-reported measures.</td>
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CCBHC State Program Status

Demonstration States Not Currently Certifying New Sites

• Kentucky
• Michigan
• New Jersey
• New York
• Oregon

States Currently Certifying New Sites

• Kansas
• Minnesota
• Missouri
• Nevada
• Oklahoma
• Pennsylvania (ICWC)*
• Texas (No PPS)

**Bolded States** = Part of Medicaid Demonstration

**Italicized States** = Independent State Adoption of CCBHC

*In 2019, Pennsylvania converted the CCBHC program to a Pennsylvania-specific model called Integrated Care and Wellness Clinics (ICWC).
Common Elements of Certification

• **Needs Assessment**: All states complete a state-wide needs assessment to identify community needs and gaps in the system, as well as determine program capacity and evidence based practice implementation to address those needs. Each prospective CCBHC must also complete a needs assessment for their defined service area.

• **Certification Application**: Each state requires a written application for CCBHC certification.

• **Certification Checklist**: States often use a version of the certification checklist SAMHSA provided as part of the demonstration and/or as an attachment to the CCBHC-E grant NOFO.

• **Certification Documentation**: States often require submission of required plans, policies, and procedures.

• **Site Visit**: Many states include a site visit in their certification process with specific checklist items to be reviewed on-site.

• **Cost Report**: All states require a prospective CCBHC to complete a CMS-developed CCBHC cost report that includes actual and “anticipated” costs for all people to be served, regardless of insurance status.

• **PPS Rate Setting**: Based on the approval of the CCBHC cost report, a rate is established with the clinic.

• **Review of Certification**: Most states require a review of the CCBHC a year or more into implementation of the model to ensure fidelity is maintained.
Culture Change is Pivotal to Sustainability

CCBHC as a temporary, siloed, grant-funded program vs. CCBHC as a transformational way of providing behavioral health care and doing business
Organizational Culture Change in the Context of CCBHC Certification and Alternative Payment

CCBHCs that are certified in the Demonstration States receive a prospective payment system rather than a traditional fee for service reimbursement.

- Clinics must prepare to shift from managing a grant budget to managing a PPS rate.
- Because rates are set based on projected utilization, strong capacity for projecting anticipated costs will reduce the risk that clinics experience a financial loss if the level of need or intensity of services exceeds what was anticipated.
- CCBHC grantees can begin to prepare by building infrastructure and capacity into grant budgets to better understand their client utilization patterns, implement risk stratification tools, and determine the true costs of providing care.
- CCBHC grantees also can begin to embrace a culture of value and make better use of data to help drive clinical decision-making.
Preparing for Certification: Tips and Tactics

CCBHC-E National Training and Technical Assistance Center
Funded by Substance Abuse and Mental Health Services Administration and operated by the National Council for Mental Wellbeing
Preparing for Certification – First Steps

*If you do not currently have any CCBHC funding support (which is not likely most of you on the line!)*...

- Assess your current operations and services against the CCBHC criteria.
- Consider pursuing a SAMHSA CCBHC grant to support preparation.
- Conduct a needs assessment of your community.
Preparing for Certification as a CCBHC Grantee

- Leverage the attestation process as practice and preparation for certification
- Maintain attestation materials
- Complete a comparison of the grant attestation requirements and your state's certification requirements to formulate a work plan
- Update your needs assessment
Preparing for Certification

- **Understanding your options and guidelines**
  - Identify CCBHC status in your state
  - Research state certification process
  - Know your state’s priorities for CCBHC services and EBPs
  - Connect with other grantees + state behavioral health association

- **Organize and prepare**
  - Build strong knowledge of criteria requirements
  - Develop process for compiling/maintaining materials
  - Prepare for state certification or licensing requirements
  - Prepare for PPS
  - Establish data collection and quality reporting capacity
Case Study: Integrated Services of Kalamazoo

CCBHC Planning: Crosswalk... Develop... Braid it together

<table>
<thead>
<tr>
<th>CRITERIA</th>
<th>DESCRIPTION</th>
<th>EVIDENCE</th>
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<tbody>
<tr>
<td>Their Ask</td>
<td>...What is being asked for, sourced through the feds.</td>
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<tr>
<td>Your Story</td>
<td>...Your organization’s specific actions, processes, and history that support the criteria.</td>
<td></td>
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<tr>
<td>Your Proof</td>
<td>...Reference list with proof of existence for a given criteria; what, exactly you have in place and documented.</td>
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www.TheNationalCouncil.org
Case Study: Western Mental Health Center
Questions?
Preparing for Session 3: Financial Sustainability

Total annual allowable CCBHC costs

Total number of CCBHC daily or monthly encounters per year

Daily/Monthly Medicaid PPS encounter rate

- CMS CCBHC cost report used to generate rate
- All costs regardless of payer source
- Direct costs (e.g., staff salaries, supplies)
- Allocated indirect costs (e.g., rent, insurance)
- Anticipated direct and indirect costs
- Stratified rates for complex populations in monthly rate

Invite your Finance Team to Session 3

www.TheNationalCouncil.org
Session 3: Financing for Sustainability – Understanding Your Costs and Preparing for New Payment Models

- Monday, Jan. 9, 2-3 p.m. ET
- Register here
Monthly Cohort Calls

Monthly cohort calls from the CCBHC-E NTTAC give CCBHC staff members a regular space for sharing with peers, generating solutions and cross-collaboration. Participate as often as you like. Sign up today and share this opportunity with other members of your team!

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<th>Date + Time</th>
<th>Registration Link</th>
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<tr>
<td>Executives</td>
<td>The last Friday of each month from 12:00-1:00pm E.T.</td>
<td>Register here</td>
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<tr>
<td>Program Directors</td>
<td>The first Wednesday of each month from 12:00-1:00pm E.T.</td>
<td>Register here</td>
</tr>
<tr>
<td>Evaluators/CQI Leads</td>
<td>The first Tuesday of each month from 3:30-4:30 pm E.T.</td>
<td>Register here</td>
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<tr>
<td>Medical Directors</td>
<td>The first Monday of each month from 12:00-1:00 pm E.T.</td>
<td>Register here</td>
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Questions or Looking for Support?

Visit our website and complete the Request Technical Assistance form

https://www.thenationalcouncil.org/ccbhc-enttac/
Thank You!

Thank you for attending today’s event.

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Your feedback is important to us!

Please complete the brief event survey that will open in a new browser window at the end of this meeting. Your input helps us improve our support offerings and meet our SAMHSA data metrics.

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**Calendar of Events**

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- Future Events
- Future Events
- Past Events
- Apply