

Administrative/Regulatory Relief Work Group Minutes

March 6, 2012

Opening Remarks

Chuck opened the meeting by welcoming everyone. He thanked OASAS Division of Outcome Management and System Information (DOMSI) staff for attending and agreeing to present at today's meeting.

Alexis thanked everyone for staying connected and indicated that emerging issues/priorities across the state would be surfacing and is confident that this work group will organize around the challenges and take them on.

As busy as he is, Steve Hanson facilitated the meeting as he always does -- with grace and humor.

Standards Compliance Updates

Bill Lachanski and his staff provided some updates and current information on Part 822 regulations and resources.

OASAS Website Postings

Site Review Instrument You Tube Trainings (David Herbert)

- On January 4th, Part 822-4 and 822-5 Site Review Instrument You Tube trainings were available. As of March 2nd, there were approximately 3,300 "hits" to the trainings; 2,500 for outpatient trainings and 800 for opioid treatment trainings. Survey Monkey results indicated positive feedback in format, information provided and availability (You Tube). A special thank you went to Laura Higgins and Barbara Vuolo for their hard work and tenacity in getting these trainings posted. This format is being considered for future training resources/tools. The You Tube trainings can be found on the [Part 822 Forms and Resources](#) web page or directly at the following links:
 - [Part 822-4 Outpatient and Outpatient Rehabilitation Site Review Instrument Training](#)
 - [Part 822-5 Opioid Treatment Programs Site Review Instrument Training](#)

Outpatient Frequently Asked Questions (FAQs) Portal (Laura Higgins)

- Also new to the [Part 822 Forms and Resources](#) web page is a [Part 822 FAQs](#) portal. This question and answer portal was developed based on frequently asked questions received by the Technical Assistance/Systems Reform Unit (TA) and is updated on a regular basis. If you do not see your question(s) in the catalogue or if you need additional information/clarification regarding a question/answer, you can contact the TA mailbox at: TechnicalAssist@oasas.ny.gov.

Part 822-4 Model Case Record Additions (Laura Higgins)

- A new model case record form ([TA-7a](#)) has been added to the Part 822-4 model case records form set. This form, mainly used by downstate providers, has been updated to meet the new Part 822 outpatient regulations that were effective July 1, 2011, is now fillable and combines the Comprehensive Treatment Plan/Recovery Plan and the Treatment/Recovery Plan Review forms into one. This form can be found on the [Part 822 Forms and Resources](#) web page.
- The [Communicable Disease Risk Assessment \(TA-6a\)](#) form was previously listed on the [Part 822 Forms and Resources](#) web page as a resource, but is now available as a fillable form.
- The [Outpatient Rehabilitation Weekly Progress Note \(TA-13\)](#) form has been revised to meet billing parameters (25 minutes minimum for individual counseling; and 60 minutes minimum for group counseling).

Part 822-5 Model Case Record Additions (Ilyana Meltzer)

- In continuing to create tools and resources in the regulatory compliance arena, TA is currently in the process of developing model case records for Opioid Treatment Programs (OTP) using the Part 822-4 forms as a starting point. The forms are still in the “internal” development stage and will be vetted through several OASAS/provider committees/subcommittees, including the Administrative/Regulatory Relief Work Group prior to posting them to the web site. Providers interested in working on the Part 822-5 OTP Subcommittee were asked to submit their name via e-mail to the [TA mailbox](#).

NYSCRI (Bill Lachanski)

The NYSCRI Review and Implementation Team (RIT) held several sessions in January and February and made significant progress in revising the NYSCRI form set to be consistent with the new Part 822 regulations (822-4 and 822-5). In addition to revising the forms for compliance with OASAS regulatory requirements, the revised form set will also address OASAS Client Data System PAS requirements and some changes in the Joint Commission standards that were issued in 2011.

The sessions were attended by OASAS, OMH, provider representatives and MTM Consultants to address all of the necessary changes to the forms. Some final work is being completed and the forms will then go through an approval process by the NYCRI Oversight Committee. If providers have any questions, please contact Rick Vedder of the Bureau of Technical Assistance/Systems Reform Unit at RickVedder@oasas.ny.gov.

Part 822-4 Policy and Procedures Guidelines (Laura Higgins)

- Another resource/tool recently finalized by the TA Unit is the Policy and Procedure Guidelines for Part 822-4 Outpatient and Outpatient Rehabilitation Programs. This document is intended to support providers in the development of a Policy and Procedure Manual and to reflect the philosophy and actual practices of the program.

Laura thanked the providers that worked closely with her in the development of this document and Pat Fralich of Credo Community Center for the Treatment of Addictions, Inc. gave a testimonial in the practical use of this document.

The document will be posted on the [Part 822 Forms and Resources](#) web page in the near future. A similar document will be developed for Part 818 - Inpatient Rehabilitation Services; providers interested in working with TA staff in the development of this document should submit their name via e-mail to the [TA mailbox](#).

UR/QI Checklist (Laura Higgins)

- Another resource/tool in final stages of development that was given to work group members prior to the meeting for review is the Utilization Review/Quality Improvement Plan Checklist. This document was developed to support programs in their development of a quality utilization review process and quality improvement plan. Group members were asked to provide any comments/questions regarding this document to the [TA mailbox](#).

APGs Update (Ilyana Meltzer)

- OASAS certified freestanding Part 822-4 and Part 822-5 programs went live with APG rate code claiming in January 2012. Hospitals are still claiming using the former rate codes/reimbursement amounts and will continue to do so until further notification. All programs (Freestanding and Hospital) are delivering/documenting services pursuant to the July 1, 2011 Part 822 regulations.
- To support the implementation of APG rate codes in the freestanding programs, a [billing notification](#) was sent to the field and added to the OASAS [APG](#) website. The [APG manual](#) was also updated to further clarify information on common areas OASAS had received from the field. Finally, the [APG online FAQs](#) are routinely updated as OASAS receives APG questions that have commonality to the field.

- In response to field requests and as supported by the APG Steering Committee, OASAS is planning an online Spring 2012 APG refresher training to provide a refresher on APG reimbursement; billing; and some clinical areas that programs routinely have questions about. The training will use the same format as what was used for the Site Review Instruments as that format has been well received.
- Notification went to the Opioid programs regarding billing for the regulatorily required initial and annual physicals. Specifically, OTP programs should utilize the OTP medical visit rate code to ensure full APG payment. If this service is placed on the episode claim, it will blend.
- Finally, as previously discussed with the field during last spring's training, the Outpatient Rehabilitation (OPR) weights are being revised to more closely align with reported costs. The reweighting will apply for dates of service 4/1/12 forward and will not be applied retroactively. The anticipated revised downstate 4+ hour full APG payment is \$113, compared to the pre APG payment of \$87. The anticipated revised 4+ hour full APG payment is \$97, compared to the pre APG payment of \$73. During the phase in periods, OPR programs will receive a percentage of the pre APG payment **PLUS** a percentage on the anticipated full APG payment.

Part 822-4 and Part 822-5 Recertification Reviews (David Herbert)

- Beginning January 1, 2012, the Program Review Unit resumed recertification reviews of outpatient and opioid treatment programs. Approximately 50 reviews have been conducted to date and common issues/deficiency trends are already becoming evident.

Outpatient

- physical health requirements must be completed as part of the comprehensive evaluation, prior to the approval of a QHP and within 45 days of admission;
- labeling of progress notes – progress notes are lacking the type of note (brief treatment note, complex care coordination, individual, group, collateral, etc.) and may result in oversight and billing implications.

OTP

- treatment plan being approved by a multi-disciplinary team within 30 days will not apply until January 1, 2013;
- deficient in central registry requirement;
- physician evaluation within 72 hours; and
- failure to discuss in case conference patients not responding to treatment.

Client Data System Update (Bill Hogan)

- A new Measures Development Committee has been formed, through DOMSI. Co-chairs include representatives from DOMSI, Local Governmental Units (LGUs) and providers. The committee has met twice already and will be working on developing measures for the remaining service types for development of Scorecards. Bill mentioned that all measures must be reviewed and approved by this newly developed committee.
- The PAS – 48 form has been revised in accord with new regulatory requirements and to also address APG compliance.
- Treatment Scorecards for 2011 were issued in November. This is the first time that the Scorecards are available to the general public, provider community and LGUs and they have received a lot of attention. The 2012 Scorecards should be available in June 2012. If you have any questions regarding Scorecards, please e-mail them to Scorecard@oasas.ny.gov.
- Bill indicated that the IPMES/Workscopes for New York City providers should be going out this week and shortly thereafter for everyone else (calendar year). For questions regarding IPMES, please contact Tammy January at (518) 457-9555 or e-mail them to her at TammyJanuary@oasas.ny.gov.

Gold Standard Initiative

Previously, Chuck asked this group for assistance in framing a workshop for the ASAP Conference. As usual, the group came through with flying colors. On November 1st, Chuck, Moishe Slomowitz and four provider experts representing this work group (from Child Center of NY, Horizon, LESC and Samaritan) presented a workshop entitled “Ensuring Patient Centered Care through Quality Management Systems”. The workshop highlighted 4 of the 6 Gold Standard Elements (Talent Management, Quality Improvement, Evidenced Based Practices and Programs and Compliance) with each provider highlighting one element and sharing their experiences in achieving excellence and sharing their own tools/resources with the workshop participants. The workshop was well received and very well attended (additional seating had to be brought into the room). Chuck also thanked ASAP and Alexis Gadsden for giving him the opportunity to once again spotlight the Gold Standard Initiative.

Open Dialogue

- It was mentioned that changes related to Health Care Reform may require significant review of OASAS regulatory standards, and that this work group is well equipped to add value to such an exercise.
- The issue of developing adolescent outcomes was discussed. It appears that this was a subject of discussion several years ago but did not come to fruition. Bill Hogan agreed to look into this area and asked the work group members to send him information at: WilliamHogan@oasas.ny.gov.

Wrap Up/Adjourn

Chuck and Alexis thanked everyone for a great meeting. They are looking forward to seeing everyone together for the next meeting scheduled for Tuesday, June 5, 2012 from 10:30 – 1:00 in Albany.