

**Regulatory Modernization Initiative**  
**Integrated Primary Care and Behavioral Health Workgroup Meeting**  
Thursday August 17, 2017 10:30 a.m. – 3:00 p.m.

MINUTES

- Welcome and Opening Remarks: Dan Sheppard
- Meeting Objectives and Introduction of Workgroup Members: Dr. John Rugge
- State Agency Overview of Current Integrated Care Models: Jennifer Treacy (DOH), Keith McCarthy (OMH), Trisha Schell-Guy (OASAS)
  - 2008 Licensure Threshold
  - DSRIP 3.a.i Threshold
  - Integrated Outpatient Services (IOS)
  - Barriers
- Success and Limitations of Service Integration under Current Models:
  - Dr. David Flomenhaft (IOS Provider, Mercy Medical Center)
    - Great for patients (“no wrong door”) do not have to move patients to another clinic as substance abuse comes under control
    - Barriers
      - Sustaining primary care services financially
        - Billing for physical medicine services on behavioral health claim inflexible
        - Limitations in preventative medicine coding in OMH guidelines (no Medicare reimbursement)
        - Unable to support full primary care services
      - Physical plant standards (e.g. clean and soiled linen rooms)
      - Professional change in traditional ways of providing care (e.g. tele psychiatry)
      - Reporting requirements (OASAS Federal Block Grant requirements)
      - Workforce (LMHCs not yet recognized by CMS)
  - David Shippee (DSRIP 3.a.i Provider Whitney Young Health Center)
    - Barriers
      - Scale matters to sustain services (expertise, volume)
      - Mobile Article 28 (not a long term solution but for the short term solves billing and ability to start offering services)
      - IT/Medical Records (Each provider having access to a patient’s medical record in order to be able to coordinate care)
      - Billing
        - Confusion of payers with different types of billing FFS, APGs and new codes

- Timeliness of reimbursement (Invest in order to provide services without seeing returns for some time)
- Licensure Expansion for Comprehensive Services Approaches: Ann Monroe
- Input and Comments main topics:
  - Billing/Reimbursement
    - Incentivize care integration
    - Better identification of total cost of care (where costs are saved, where spending increased)
    - Services within scope of practice should be billable
    - Inability for certain practitioners to bill in certain settings (e.g. Licensed Mental Health Counselors in Article 28)
    - More flexible billing (e.g. able to add physical medicine diagnosis on claim when treating behavioral health disorder)
  - Workforce/Staffing
    - Scope of practice (e.g. NP/PA regulations)
    - Reduction in unnecessary paperwork (e.g. Treatment Plan)
    - Resident physician supervision requirements
  - Care Transitions
    - Health Home
    - Medical Reconciliation, Care coordination
    - Social Determinants of Health Services (housing, transportation, education, etc.)
    - Flexibility in PCP assignment/designation
    - Promote/require provision of services
  - Oversight (joint surveillance/licensure)
    - Article 16 clinics
    - Simplification of application process and surveillance
    - Physical Plant Requirements
    - Allowance of services in other settings (e.g. Syringe Exchange Programs, Day Rehab, OMH/OASAS Inpatient Settings)
  - Information Technology (EMR, telehealth)
    - Record Sharing (especially for MH and SUD)
    - Geographic barriers in Tele psychiatry
- Licensure Expansion for Comprehensive Services
  - It is more difficult to add primary care to behavioral health settings
  - Suggestions from meeting are on attached table