

SENATE HEALTH & WELFARE COMMITTEE
Wednesday, January 27, 2016

ATTACHMENT 3

**Regarding the Rejection of
Pending Fee Rule for Behavioral Health Programs in
Docket 16-0715-1501**

Representing Children's Supportive Services and in support of The Idaho Association of Community Providers, which represents Behavioral Health providers throughout the state, I am requesting you oppose the new chapter of Pending Fee Rule which would establish a credentialing program for Behavioral Health Programs operated by State employees. Such a program would not add any value, duplicates reviews already conducted by the Managed Care Organization (Optum Idaho) and does not meet the requirement in Idaho code for Behavioral Health Agencies to meet national accreditation standards.

The rules that raise our concern are contained in Docket 16-0715-1501, this set of rule is interrelated to Docket 16-0717-1501 which were both published in the September 2015 Bulletin:

<http://adminrules.idaho.gov/bulletin/2015/09.pdf>

Both of these sets of rules are related to a set of "Behavioral Health Standards" available on the Division of Behavioral Health's Mental Health site here:

<http://healthandwelfare.idaho.gov/Default.aspx?TabId=103>

Five Reasons to Reject This Pending Fee Rule

- (1) Prior to 2013 the Department of Health & Welfare spent \$779,000.00 per year conducting an ineffective credentialing process.
- (2) HB260 was passed which requires Behavioral Health Agencies to meet national accreditation standards. This requirement has yet to be implemented by the Department.
- (3) In the original rules announcement the descriptive summary stated: *"This new chapter of rule is being written to **meet the needs of the Department** in developing a behavioral health system of care".*
- (4) *The Behavioral Health Managed Care Organization (Optum Idaho) is already paid for and conducts credentialing reviews on all providers in their network.*
- (5) *A move to the National Accreditation, as required in Idaho Code, would improve quality and outcomes of Behavioral Health Services.*

Please vote to reject this rule and, instead, request the Department set up negotiated rule making this Spring to require a "sunset" date by which time National Accreditation will be required for all Behavioral Health Providers.

Thank you.

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