

STATE OF ALASKA

DEPT. OF HEALTH AND SOCIAL SERVICES

DIVISION OF BEHAVIORAL HEALTH

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September 29, 2011

RE: **Guidance Document:** *Integrated Behavioral Health Regulations* – Transition Issues - Delay in System Implementation

Dear Provider:

Within the last few days the Division has received various comments from agencies outlining areas of concern which are impacting their ability to fully implement the Integrated Behavioral Health Regulations on October 1, 2011. On September 19, 2011 the Division received a letter from the Anchorage Regional Behavioral Health Coalition formally requesting a delay in the implementation of the new regulations. To more clearly understand the nature of these concerns, Behavioral Health staff met with members of the Coalition on September 23, 2011. At this meeting, members of the coalition stated that regulation concerns were discussed at the Alaska Behavioral Health Association meeting and members attending the Association meeting unanimously agreed with these concerns and were also in support of a delay. These concerns include: agency system and programming changes; correct provider billing numbers; unclear prior authorization process; billing and authorization errors; provider agency staff is not fully educated and have not implemented internal operational changes to support the new requirements; management and policy responses are not yet developed to respond to the new regulations; staff training is required; changes in quality assurance process need to be developed; changes in workflow and internal agency processes are necessary and more.

Based on these issues, the Department has agreed to a delayed system implementation of these regulations. This means that agencies will continue to provide and bill for services using the current program and enrollment guidelines for services rendered through November 30, 2011 dates of service while transitioning internal operations to the new regulatory requirements. All services provided on and after December 1, 2011 must be provided according to the integrated regulatory standards and will be processed using these new requirements.

While the Division has proposed this revised implementation plan to assist providers in this transition, each agency will be responsible for managing their own implementation timeline to insure full compliance by December 1, 2011. We understand that each agency has been preparing for this system integration and we appreciate your continued attention to this effort. In the next two months, you will be receiving additional guidance documents related to the transition.

You can expect additional guidance and information from the DBH website specific to the implementation of the new integrated regulations: <http://www.hss.state.ak.us/dbh/bh-Regs.htm>. This website provides access to provider communications, training and technical assistance, Frequently Asked Questions, and the Regulation Clarification process to submit additional questions.

Sincerely,



Melissa Witzler Stone
Director

Cc: Kimberli Poppe-Smart, Deputy Commissioner, DHSS
Stacy Toner, Operations Manager, DBH
Teri Keklak, Behavioral Health Program Administrator, DBH
Brenda Knapp, Treatment & Recovery Section Manager, DBH
Mark Haines-Simeon, Policy & Planning Section Manager, DBH

Division of Behavioral Health

Guidance Document II: *Integrated Behavioral Health Regulations* – Transition issues— Implementation Delay
September 29, 2011