

Scott Walker
Governor

Kitty Rhoades
Secretary



State of Wisconsin
Department of Health Services

DIVISION OF QUALITY ASSURANCE

1 WEST WILSON STREET
P O BOX 2969
MADISON WI 53701-2969

Telephone: 608-266-8481
FAX: 608-267-0352
TTY: 888-241-9432
dhs.wisconsin.gov

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DQA Memo 14-003

To: [Certified Mental Health/AODA](#)

CMHA 01

From: Creneear Mims, Director
Bureau of Health Services

Via: Otis Woods, Administrator
Division of Quality Assurance

Regionalization Application Process for Comprehensive Community Services (CCS)

The Department of Health Services (DHS) is currently considering July 1, 2014 – December 31, 2015 the Comprehensive Community Services (CCS) regionalization rollout period. The purpose of this memo is to provide guidance to counties about the process for certification by the Division of Quality Assurance (DQA) for those interested in implementing a regional model for the delivery of CCS under Chapter DHS 36.

Background

The Department has identified several models in the CCS expansion project. The models include:

1. Population-Based for a single county with a population exceeding 350,000.
2. Shared Services Model for a group of counties that are individually certified but agree to share resources or expenses.
3. Multi-County Model for two or more counties that partner under a single certification and create a shared CCS program.
4. 51.42 Model for Regional Departments of Community Programs or Regional Departments of Human Services.
5. Tribal Nations Options for sovereign tribal nations.

To date interested counties have been instructed to follow a 3 point process to transition to a regional model which includes:

1. Approval of the regional concept by the Division of Mental Health and Substance Abuse Services (DMHSAS),
2. DQA program certification and,

3. Medicaid enrollment and certification.

DQA Program Certification Process

The existing CCS application will not change because the application reflects requirements in the administrative rule, Chapter DHS 36. DQA has developed a supplemental form to the application in order to capture necessary information related to the regional model selected. This form may be reviewed at the following the link:

<http://www.dhs.wisconsin.gov/forms/F0/F01216.pdf>.

Because of the complexity of implementing a new service model, the DQA goal is to move as expeditiously as possible in the review process to allow regions to establish services. DQA recognizes that solutions will not be available to all questions or concerns raised to date.

Department staff acknowledge that technical assistance (TA) cannot be mandated. However, counties that do actively pursue TA prior to submitting an application could reduce delays in certification by ensuring submission of complete applications and understanding of rule requirements. If a county does engage in and commit to a successful TA process they may avoid having additional fees imposed that result from multiple certification reviews. Obtaining technical assistance up front could result in fewer delays in implementing the regional plan, less risk of impact on the delivery of services in affiliated counties and fewer delays in receiving reimbursement for covered services.

There is not a single approach to DQA certification because of the variables associated with the different regional models. Challenges to streamline the certification process include:

- All regional models are not identical. County autonomy has been encouraged to individualize service delivery consistent with the needs of the county/region. The administrative rule, Chapter DHS 36, remains unchanged, yet all counties will not share services in the same manner in the Shared Services model, Multi-County Model, or Population-Based models.
- The different models will prompt or result in different practices, policies and procedures to confirm compliance with Chapter DHS 36.
- Some counties are currently certified and are operating within an established period of certification. For those certified and remaining in essentially the same structure (e.g. 51.42) the transition and approval by DQA may be streamlined.
- Some certified counties will engage other counties that are not certified in a regional plan. The establishment of “shared” or “multi-county” certification will inevitably change the way services are delivered under current certification. Those changes will need to be identified through notification process to DQA in a plan that establishes certification for non-certified counties in the region.

- Some regions may find, after submitting a regional plan, that all counties included in that plan have delayed certification processes. This may be the result of incomplete application or inability to meet timelines. DQA will need to address changes to the regional plan or staggering of implementation of a regional plan prior to Medicaid approval. This could include a plan to approve those counties that are ready and submit requests to add additional counties at a later date.

In an attempt to minimize confusion during the transition period DQA will implement a region specific “triage” process in the DQA central office in Madison. The triage process will facilitate the DQA certification process by providing an opportunity for DQA to:

- Address unique regional certification needs through dialogue with county representatives. By engaging at this level, we can reduce delays and potential certification denial, the likelihood of incorrect or incomplete application material being submitted and duplication of efforts by county, DMHSAS and DQA staff.
- Review of compliance history of certified programs. If a program has demonstrated compliance there will be few, if any, obstacles in the transition to the regional process. If the existing certified program has not met requirements or has received citations for non-compliance, DQA staff will interface with county representatives to confirm corrective actions have been implemented. DQA staff may need to conduct a verification visit as the county transitions to a regional plan. Efforts to ensure compliance reduce risk for affiliated counties in the region.
- Clarify certification fee requirements.
- Reinforce the importance of technical assistance prior to the certification visit.
- Review the access plan or use of telehealth, when applicable.

Next Steps & Questions

If you have received approval of your regional model by the Division of Mental Health and Substance Abuse Services, please contact the DQA Behavioral Health Certification Section at (608) 261-0656 to receive guidance about steps necessary to complete certification for your regional model.

If you have other questions regarding this process, please contact the DQA Behavioral Health Certification Section main office at (608) 261-0656 or email at DHSDQAMentalHealthAODA@dhs.wisconsin.gov.