

# Children's Behavioral Health Coalition

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Dr. Maria Rodowski-Stanco, *Director*  
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Behavioral Health Administration  
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55 Wade Avenue  
Catonsville, Maryland 21228

Dr. Rodowski-Stanco:

Thank you for your efforts to ensure Maryland children and their families have access to critical behavioral health resources during this difficult time. These services and supports will become even more important as the behavioral health impact of COVID-19 continues to evolve.

It is with this understanding that we offer this feedback from the Children's Behavioral Health Coalition (CBHC) on the state's new service combination exclusions for psychiatric rehabilitation programs serving children and youth (PRP-M). While we realize that there are problems with PRP-M, and we appreciate that BHA is trying to address the issue, **CBHC and its members are concerned about the impact these changes will have on children and families utilizing these services.**

Optum released a notification to the behavioral health community on 3/1/21 that reflects a list of services excluded from delivery in combination with PRP-M.<sup>1</sup> This list includes all levels of targeted case management (TCM), a coordination service which has historically been delivered in combination with therapeutic services, such as PRP, for children with high intensity behavioral health needs.

Children and their families may require various physical and emotional supports which are delivered by multiple providers across multiple systems. TCM providers work with families to access and coordinate a range of clinical services, including PRP. One is not a replacement for the other.

## **Removing Service Options Limits the Effectiveness of Targeted Case Management**

SAMHSA guidance notes, "Case management works in tandem with behavioral health services provided under a Medicaid State Plan or waiver. Together, they help individuals access medical, social, educational, and community support...Case management should provide cohesion to an individual's team of providers, regardless of whether those providers actually work together. It also helps to avoid duplication of treatments...Case management can be thought of as the 'glue' that keeps an individual's care coordinated."<sup>2</sup>

Maryland's Medicaid state plan lists one of the eligibility criteria for TCM as whether a participant "needs care coordination services to obtain and maintain community-based treatment and services."<sup>3</sup> Care management includes the development of a plan of care (POC) for each service needed by the

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<sup>1</sup> Optum Maryland, "[Provider Alert: Updates to Medical Necessity Criteria for Psychiatric Rehabilitation Programs for Minors](#)" (March 1, 2021)

<sup>2</sup> SAMHSA, "[Medicaid Handbook: An Interface with Behavioral Health Services](#)" (g. 3-12).

<sup>3</sup> Medicaid State Plan, Supplement 3 to Attachment 3.1-A at p. 10-I.

participant.<sup>4</sup> The state plan indicates that the “care coordinator shall assure that the participant ... is receiving the necessary services available to meet the participant’s needs as identified in the POC.”

Removing a clinical intervention like PRP from the range of services that can be coordinated by a TCM provider will defeat the purpose of TCM and further limit options for Maryland children and families.

**A Binary Decision Between TCM and PRP may reduce use of TCM**

TCM and 1915(i) services are underutilized, with just 2% of eligible recipients receiving TCM services and 54 children enrolled in 1915(i) services in FY18, a number which has since decreased.<sup>5</sup> BHA has laudably indicated its desire to increase utilization of TCM and 1915(i) services, however, the Children’s Behavioral Health Coalition is concerned this policy change will undermine those efforts.

The Maryland Coalition of Families (MCF) surveyed its staff about the concurrent use of TCM and PRP services. Responses indicated that families rely on both services for different purposes and would not want to lose TCM, but if forced to choose between them, significantly more would opt for PRP. This would deprive families of care coordination, family peer support, and customized supports and services.

**Access to Care During the Pandemic is Critical**

A comprehensive behavioral health system of care for children and youth is important now more than ever. While most young Marylanders have been spared from physical symptoms of the coronavirus, they have not been spared from the loneliness, depression and anxiety that accompanies a prolonged state of isolation from friends, teachers, and community networks. The elimination of behavioral health supports and service coordination will leave families with limited resources and few options other than expensive, traumatic and unnecessary emergency room visits.

**For these reasons, CBHC urges BHA to continue allowing for the combination of TCM and PRP services for children and youth.**

Thank you again for your work, and for considering this request. You may contact Margo Quinlan, Director of Youth & Older Adult Policy at the Mental Health Association of Maryland: [mquinlan@mhamd.org](mailto:mquinlan@mhamd.org). We look forward to your response.

Sincerely,

Behavioral Health System Baltimore

Catholic Charities of Baltimore

Community Behavioral Health Association of Maryland

Community Solutions, Inc.

Jumoke Behavioral Services, LLC

Licensed Clinical Professional Counselors of Maryland

Lighthouse Youth and Family Services, Inc.

Maryland Association of Resources for Families and Youth

Maryland Coalition of Families

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<sup>4</sup> *Id.* at p. 10-L.

<sup>5</sup> MDH, [Report on Behavioral Health Services for Children and Young Adults](#), pgs. 14 and 17.

Maryland Psychiatric Society  
Maryland Psychological Association  
Mental Health Association of Maryland  
NAMI Maryland  
NAMI Anne Arundel County  
NAMI Carroll County  
NAMI Frederick County  
NAMI Harford County  
NAMI Howard County  
NAMI Kent & Queen Anne's Counties  
NAMI Lower Shore

NAMI Metropolitan Baltimore  
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National Council on Alcoholism and Drug  
Dependence of Maryland  
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The Montgomery County Federation of Families  
for Children's Mental Health