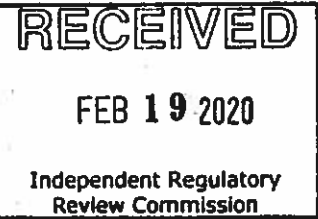


3252
Burke, Bridget

From: Schindhelm, David <schindhelmde@ccbh.com>
Sent: Thursday, February 13, 2020 9:25 AM
To: Burke, Bridget
Cc: Hentosz, Mary Eileen
Subject: [External] Proposed Rulemaking Clarification



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Good morning-

I was reviewing the Saturday February 8th, 2020 PA Bulletin and came across the proposed rulemaking regarding the addition of Chapter 168 to Title 31 of the PA code. This Proposed Rule can be found at the following link: <http://www.pacodeandbulletin.gov/Display/pabull?file=/secure/pabulletin/data/vol50/50-6/184.html>

I wanted to ask for some clarification. Is this requirement applicable to Behavioral Health Managed Care Organizations (BH-MCOs) participating in PA Medicaid HealthChoices? Community Care has been working with the state to complete the parity analysis but to date we do not yet know the PH benchmarks which we as a BH-MCO must use to attest whether our QTL and NQTLs are no more restrictive.

As an organization we are committed to comply with all applicable laws/regulations so I was hoping you could provide some clarification. Please let me know if you have any questions and I would be happy to discuss in greater detail. Thanks so much for any assistance/clarification you can provide on this proposed rule.

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