

14-548-29
Received 8/8/2022



Madera, Laurie

From: Schrag, Meghan <MSchrag@montcopa.org>
Sent: Monday, August 8, 2022 9:55 PM
To: PW, Psych Rehab
Cc: Schilling, Karli M.
Subject: Montco and Magellan feedback

Good afternoon,

Below please find the combined feedback from Magellan Behavioral Health, Montgomery County Office of Mental Health, and Montco psych rehab providers regarding the proposed regulations. The bolded responses indicate priority or questions remaining.

- Overall it is great. Psych Rehab will be a good fit for some adolescents
- Lowering the age to 14 is a good thing and could potentially help reduce waitlists for other outpatient services for kids
- Good that they added “home” as place of service.
 - Would be even better if they added “car” or “transport” as POS. Especially since psych rehab is often teaching people how to take public transportation or accompanying to job interviews or college tours.
- **The new exception process should resemble other services which says that County can grant an exception.**
- Wonderful addition to not having to sign the daily entry.
- There is a recommendation to remove the requirement that individuals sign their record every time services are provided. **How will this align with MA Bulletin 99-89-05 on Encounter Forms as well as the established OMHSAS guidelines around Collaborative Documentation?**
- *Content of individual record (5230.21). The proposed regulation provides for parental or caregiver consent to receive PRS if the individual is under 16 years of age and allows for the release of records with the individual’s consent or parent’s or caregivers consent if the individual is under 18 years of age to family members and other supports, as appropriate, because their input is important when individuals under 18 years of age receive PRS. It also adds a requirement that staff documentation of coordination with other services and supports include a description of outreach and engagement efforts with natural supports, which are individuals or organizations chosen by the individual to provide assistance and resources, and a description of ongoing contacts and involvement with formal supports. **This language appears to conflicts with state regulations as minors aged 14 – 17 can consent to behavioral health treatment and would control the release of their records, not the parent.***
- **Per our RSC team, the changes are all positive. The language changes are definitely more R&R focused, reducing much of the stigmatizing language. The telehealth change is needed, so team was glad to see that. The new regs align much more with other peer related services, which makes managing programs much easier. All in all, we are both happy with the changes.**

Thank you for your consideration,
Meghan Schrag

Meghan Schrag, MSW

Deputy Administrator
Office of Managed Care Solutions
Montgomery County Department of Health and Human Services
P.O. Box 311
Norristown, PA 19404-0311
610.278.3542 (email is preferred due to remote work status)
Email MSchrag@montcopa.org
www.montcopa.org/hhs



Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, forwarding, or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.