

Recommendations: CSB Behavioral Health Services

RECOMMENDATION 1

The Department of Behavioral Health and Developmental Services should develop a process for receiving DLA-20 composite and individual item scores from all community services boards (CSBs) at least quarterly, and this process should use data in CSB electronic health records systems and not require separate data entry by CSB direct care staff. (Chapter 2)

RECOMMENDATION 2

The General Assembly may wish to consider including language in the Appropriation Act requiring the Department of Behavioral Health and Developmental Services (DBHDS) to report annually on (i) community service board (CSB) performance in improving the functioning levels of its consumers based on composite and individual item scores from the DLA-20 assessment, or results from another comparable assessment, by CSB, (ii) changes in CSB performance in improving consumer functioning levels over time, by CSB, and (iii) the use of functional assessment data by DBHDS to improve CSB performance to the State Board of Behavioral Health and Developmental Services and the Behavioral Health Commission. (Chapter 2)

RECOMMENDATION 3

The General Assembly may wish to consider including funding in the Appropriation Act to fund a salary increase for direct care staff at community services boards. (Chapter 3)

RECOMMENDATION 4

The General Assembly may wish to consider including language in the Appropriation Act directing the Department of Behavioral Health and Developmental Services to report annually to the State Board of Behavioral Health and Developmental Services and the Behavioral Health Commission on average salaries, turnover, and vacancy rates, by position type, across community services boards. (Chapter 3)

RECOMMENDATION 5

The General Assembly may wish to include language in the Appropriation Act directing the Department of Behavioral Health and Developmental Services (DBHDS) to amend community services board (CSB) performance contracts to require that (i) any funding appropriated by the General Assembly to CSBs for staff compensation only be used for staff compensation and (ii) CSBs report annually on any staff compensation actions taken during the prior fiscal year to DBHDS. (Chapter 3)

RECOMMENDATION 6

The General Assembly may wish to consider including language in the Appropriation Act directing the Department of Behavioral Health and Developmental Services (DBHDS) to (i) identify all current DBHDS requirements related to documentation and reporting of community services board (CSB) behavioral health services; (ii) identify which of these requirements currently apply to work by CSB direct care staff; (iii) identify any DBHDS requirements of direct care staff that are duplicative of or conflict with other DBHDS requirements; (iv) eliminate any requirements that are not essential to ensuring consumers receive effective and timely services or are duplicative or conflicting; and (v) report to the State Board of Behavioral Health and Developmental Services and the Behavioral Health Commission on progress made toward eliminating administrative requirements that are not essential, are duplicative, or are conflicting. (Chapter 3)

RECOMMENDATION 7

The General Assembly may wish to consider including language in the Appropriation Act directing the Department of Behavioral Health and Developmental Services (DBHDS) to contract with one or more higher education institutions to establish training and technical assistance centers to (i) deliver standardized training for preadmission screening clinicians on developing appropriate preadmission screening recommendations (including those related to the temporary detention of individuals and admission to psychiatric hospitals), interpreting lab results, and understanding basic medical conditions and (ii) provide technical assistance to preadmission screening clinicians, particularly when quality improvement is deemed necessary by DBHDS. (Chapter 4)

RECOMMENDATION 8

The Department of Behavioral Health and Developmental Services should develop and implement (i) a comprehensive and structured process to review a sample of preadmission screening forms from each community services board on an ongoing basis to ensure sufficient information is collected during preadmission screenings and that the resulting recommendations, including those related to the temporary detention of individuals and admission to psychiatric hospitals, are well supported; and (ii) an actionable quality improvement process to address identified shortcomings with CSB preadmission screenings and recommendations. (Chapter 4)

RECOMMENDATION 9

The General Assembly may wish to consider including funding in the Appropriation Act for the Department of Behavioral Health and Developmental Services to help community services boards hire additional staff for residential crisis stabilization units whose bed capacity is not fully utilized because of a lack of staff. (Chapter 4)

RECOMMENDATION 10

The General Assembly may wish to consider including language and funding in the Appropriation Act to support the development and ongoing operations of additional residential crisis stabilization units for children and adolescents, the Southside area, and any other underserved areas of the state, and to direct that the Department of Behavioral Health and Developmental Services provide detailed information on the following before such funding is provided for a new unit to ensure the most strategic deployment of limited resources: (i) the unmet needs the new unit will address, (ii) the capacity of community service boards or private providers to staff the proposed unit, (iii) the unit's ability to serve individuals under a temporary detention order, (iv) expected initial and ongoing costs of the proposed unit, and (v) the planned timeframe for when the unit would become operational. (Chapter 4)

RECOMMENDATION 11

The Department of Behavioral Health and Developmental Services (DBHDS) should contract as soon as practicable with a vendor to implement a secure online portal, which is compliant with the Health Insurance Portability and Accountability Act (HIPAA), for community services boards to upload and share patient documents with inpatient psychiatric facilities. (Chapter 4)

RECOMMENDATION 12

The General Assembly may wish to consider amending §37.2-308.1 of the Code of Virginia to repeal the requirement that every state facility, community services board, behavioral health authority, and private inpatient provider licensed by the Department of Behavioral Health and Developmental Services participate in the acute psychiatric bed registry. (Chapter 4)

RECOMMENDATION 13

The Department of Behavioral Health and Developmental Services (DBHDS) should develop and implement (i) a comprehensive and structured process to oversee the practices of community services boards (CSBs) related to discharge planning from psychiatric hospitals, particularly compliance with and effectiveness of their discharge planning responsibilities, and (ii) mechanisms for corrective action, technical assistance, and guidance when shortcomings are identified with CSBs' discharge planning efforts. (Chapter 4)

RECOMMENDATION 14

The General Assembly may wish to consider including language in the Appropriation Act directing the Department of Behavioral Health and Developmental Services to work with the Department of Medical Assistance Services to (i) develop and implement a targeted review process to assess the extent to which community services boards (CSBs) are billing for Medicaid-eligible services they provide, (ii) provide technical assistance and training, in coordination with Medicaid managed care organizations, on appropriate Medicaid billing and claiming practices to relevant CSB staff, and (iii) report the results of these targeted reviews, and any technical assistance or training provided in response, to the House Appropriations and Senate Finance and Appropriations committees no later than December 1, 2023, and annually thereafter. (Chapter 5)

RECOMMENDATION 15

The General Assembly may wish to consider including language in the Appropriation Act directing the Department of Medical Assistance Services to (i) work with the managed care organizations (MCOs) to standardize, to the maximum extent practicable, policies, procedures, and requirements that CSBs must follow to receive reimbursement for the cost of Medicaid services they provide, including documentation, training, and credentialing requirements; and (ii) report on the improvements made to MCO policies, procedures, and requirements to the Behavioral Health Commission no later than December 1, 2023. (Chapter 5)

RECOMMENDATION 16

The Department of Medical Assistance Services should work with managed care organizations (MCOs) to ensure that comprehensive information about all available MCO preferred provider programs is provided to all community services boards (CSBs), including (i) which behavioral health services are included in the preferred provider programs and (ii) the requirements CSBs must meet to participate in the programs. (Chapter 5)

RECOMMENDATION 17

The General Assembly may wish to consider amending §37.2 of the Code of Virginia to (i) clearly articulate the purpose of community services boards (CSBs) services within the state's system of community-based behavioral health services and (ii) require the Department of Behavioral Health and Developmental Services to develop clear goals and objectives for CSBs that align with and advance the articulated purpose and include them in the performance contracts. (Chapter 6)

RECOMMENDATION 18

The Department of Behavioral Health and Developmental Services (DBHDS) should complete a comprehensive review of the performance contracts with community services boards and revise all performance measures in the base performance contracts and addendums to ensure that, at a minimum, (i) the performance measures are designed to measure relevant consumer experiences and outcomes; (ii) each performance measure includes a relevant benchmark, and (iii) DBHDS has given clear direction on how it will monitor performance and enforce compliance with performance requirements. DBHDS should complete the contract revisions and report on the improvements made to the Behavioral Health Commission by December 1, 2023, and implement changes before the finalization of the fiscal year 2025 performance contracts. (Chapter 6)

RECOMMENDATION 19

The Department of Behavioral Health and Developmental Services, in consultation with the Virginia Information Technologies Agency, should provide status updates on the data exchange initiative to the Behavioral Health Commission and State Board of Behavioral Health and Developmental Services at least every three months until the project is complete. These reports should report on project status, funding, risks that could prevent the project from being completed on time and on budget, and plans to mitigate those risks. (Chapter 6)

RECOMMENDATION 20

The General Assembly may wish to include language in the Appropriation Act directing the Department of Behavioral Health and Developmental Services (DBHDS) to develop and implement clear and comprehensive requirements and processes for monitoring community services boards' (CSBs) performance with respect to the provision of behavioral health services. At a minimum, DBHDS's monitoring requirements and processes should (i) evaluate CSB performance on key consumer outcome measures, including measures of functional impairments, and compliance with performance contract requirements on an ongoing basis; (ii) use existing data and information it collects to analyze performance of CSBs and facilitate needed improvements; (iii) integrate the monitoring efforts and reporting requirements across all offices involved in CSB funding and oversight; (iv) establish a process for communicating the results of performance monitoring to CSBs; (v) develop expectations for the content and outcomes of quality improvement plans; and (vi) clearly articulate the enforcement mechanisms that will be used to address substantial underperformance or non-compliance. (Chapter 6)

RECOMMENDATION 21

The General Assembly may wish to consider amending § 37.2-508 of the Code of Virginia to require the Department of Behavioral Health and Developmental Services to (i) regularly monitor community services boards' (CSB) compliance in meeting performance contract requirements; and (ii) use available enforcement mechanisms, as necessary, to ensure CSBs are in substantial compliance with the requirements established in their performance contracts. (Chapter 6)

RECOMMENDATION 22

The General Assembly may wish to include language in the Appropriation Act directing the Department of Behavioral Health and Developmental Services (DBHDS) to report community services board (CSB)-level performance information, including any substantial underperformance or non-compliance and associated enforcement actions, annually to (1) each CSB governing board, (2) the Behavioral Health Commission, and (3) the State Board of Behavioral Health and Developmental Services. (Chapter 6)
