

# Residential Substance Use Disorder Treatment for Adults Frequently Asked Questions # 8

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*July 14, 2017*

## **Staffing Grace Period Announcement:**

The Department has extended the staffing grace period to 90 days from the implementation of the benefit such that all adult residential SUD programs must come into full compliance with all regulations no later than October 1, 2017. Providers must attest for the staffing they have at the time of their application regardless of whether they meet the full staffing requirements or not. Providers who are not in full compliance must demonstrate every effort to come into compliance with staffing by including a staffing recruitment plan with their initial application. These providers must also submit an additional attestation prior to October 1, 2017 attesting to meeting the full staffing requirements.

All programs must be licensed by OHCQ to qualify for enrollment with Medicaid. Applications are not back-dated. Programs are still responsible for all clinical and therapeutic requirements to meet ASAM level of care.

- 1. In our EHR, we start a treatment plan when an individual enters treatment and add to it as an individual moves through the ASAM levels of care. Is this ok or do we need to complete a new treatment plan for each level?**

The scenario described would be appropriate as long as the treatment plan is reviewed as the individual moves from one level to another. Treatment plans should be closely tied to the individual's short term goals for recovery which will generally change more as they move from one level to another as they move along the continuum of care; their long term goals may or may not change accordingly.

- 2. If a patient is hospitalized and not physically sleeping at our program for multiple days, can we still bill for the room and board since the bed is being reserved for this patient?**

Administrative days may be used for individuals admitted to a hospital for a brief period during a medical crisis. These situations will be handled on a case by case basis. Providers should contact Beacon Clinical Department at 800-888-1965 with specifics about their case to plan the care for the individual.

- 3. Does clinical treatment have to be provided every day in order to bill for residential SUD treatment for adults? Do we need to have clinical staff on the weekends?**

Although residential SUD for adults is billed daily, the service requirements are based on a weekly service array. Providers must meet the requirements laid out in proposed COMAR 10.09.06 for the hours of therapeutic activities provided per week. All residential SUD for adults programs must have a staffing pattern that has the capacity for successful intakes and discharges on the weekends.