



Magellan
HEALTHCARESM

December 2, 2024

Department of Human Services
OMHSAS – Bureau of Children’s Behavioral Health Services, Attention: Donald Hindmarsh
Commonwealth Tower, 11th Floor
303 Walnut Street
Harrisburg, Pennsylvania 17105

Dear Donald Hindmarsh:

Magellan is in support of these proposed regulations and the many enhancements to the clinical treatment required through PRTF. We feel these changes will be beneficial to the members and families being served. We do have some comments, points of clarification, and cautions.

1. Behavioral health managed care organizations’ capitation rates and MA provider rates are anticipated to be adjusted to reflect the increased costs.

With the regulations anticipated to be effective 2026, providers will be requesting rate increases in 2025 to operationalize the many proposed staffing changes needed to meet the new requirements. BH-MCO's will not be able to accommodate those requests until the capitation rates are adjusted to reflect those increased costs. This capitation adjustment needs to precede the provider rates increases to ensure compliance with the new regulations. Can OMHSAS clarify the timing of the capitation rate increases.

2. “The proposed rulemaking also requires additional positions. The additional positions were added under the proposed rulemaking to meet Federal requirements for PRTFs and to better support the children, youth, or young adults with behavioral health needs receiving medically necessary treatment in a PRTF. The new positions include a medical director, treatment team leader, clinical director, mental health professional and a registered nurse. “.

Has OMHSAS considered implications of current workforce shortages and providers inability to fill these positions as required?

3. 1330.32. Conditions for payment.

Can you provide more information regarding the independent team required to review the recommendation for PRTF? Is this meant to indicate the review by the BH-MCO or another entity in the community or PRTF prior to the submission of the PRTF request?

4. Magellan understands the limitations on the payment for Bed Hold days when the member is admitted to the hospital. Can bed hold days also be utilized for payment for overnight stays in an emergency room which sometimes occurs while a bed is being secured?

5. Regarding the requirement for Individual therapy with the child's, youth's, or young adult's treatment team leader (Psychiatrist) for at least 1 hour each month; can this also include the monthly evaluation, and any medication management sessions completed by the Psychiatrist? Or is this a separate and distinct individual session? Psychiatric Residencies have minimal therapy training. Will there be training requirements for the team leader specific to therapy?
6. The proposed regulations do not address the co-occurring needs of many of the adolescents in PRTF programs. Magellan suggests that language be added to the regulations specifically around addressing drug and alcohol issues in adolescent programming through the Group Therapy or Psychoeducation groups.
7. 5330.148. Level system.

Within the description of the level system, it should be noted that level system has no impact on the members' visits (on site and off). Visits should not be used as a punishment or reward.

We appreciate the opportunity to provide our comments/feedback to the proposed PRTF regulations and look forward to continued partnership through the implementation process. If you have any additional questions related to our feedback, please do not hesitate to reach out.

Sincerely,



James P. Leonard, LCSW, MBA
Chief Executive Officer