



To: Members, AHA's Section for Psychiatric & Substance Abuse Services
From: Rebecca Chickey, Director, Section for Psychiatric & Substance Abuse Services

Subject: Update on Key Issues in the Behavioral Health Care Field: December 2014

AHA Regulatory Update

AHA OPPTS Advisory: The Centers for Medicare & Medicaid Services released the outpatient prospective payment system and ambulatory surgical center [final rule](#) for calendar year 2015. The final rule includes several significant changes that will continue shifting the OPPTS more definitively away from a per-service fee schedule to a prospective payment system with larger payment bundles, including implementing policies that could, over time, support movement toward bundled payment. The final rule will take effect Jan. 1. The [AHA Regulatory Advisory](#) highlights many of the rule's changes, including the CY national payment rate for hospital-based partial hospitalization programs, which is \$179.11 for Level 1 (3 services) and \$195.62 for Level II (4 or more services). This is a cut of \$11.04 for Level 1 and \$18.02 for Level II. In addition, the AHA offers members a more detailed [summary](#) prepared by Health Policy Alternatives.

AHA Comments on Health Plan Innovations: The AHA is [supportive](#) of testing innovations in care delivery for Medicare's chronically ill population, as well as innovations in Medicare Advantage that leverage these capabilities. AHA "strongly recommends" that CMS test innovations in Medicaid managed care that remove barriers to care innovation and integration for behavioral health. This includes models that prohibit the carve-out of behavioral health services from Medicaid managed care benefits, and innovations through the Medicaid Emergency Psychiatric Demonstration project, which looks at whether eliminating or restricting the scope of the Institutions for Mental Disease exclusion can improve access to care and help reduce costs.

340B 'Mega Rule' Withdrawn: The Health Resources and Services Administration has withdrawn a proposed "mega rule" for the 340B Drug Pricing Program, and instead plans to issue guidance on key policy issues beginning in 2015. HRSA said there will be an opportunity for the public to comment on the guidance it issues. The 340B Drug Pricing Program is vital to so many vulnerable patients and hospitals, particularly those that serve behavioral health patients. We look forward to engaging with HRSA when it issues the interpretative guidance.

New Resources from AHA -- Upcoming Member Conference Call Presentations/Discussions:

[*Optimizing the Patient Experience with Behavioral Health Services in Post-Acute Settings*](#)

Monday, December 8, 2014

1:00 pm – 2:00 pm Eastern (12:00 pm CT; 11:00 am MT; 10:00 am PT)

To register for this *free* Call, [Click Here](#)

[*Effective Programs for Pregnant, Addicted Patients*](#)

Monday, December 15, 2014

12:30 pm – 1:30 pm Eastern (11:30 am CT; 10:30 am MT; 9:30 am PT)

To register for this *free* Call, [Click Here](#).

[Disparities in Mental Health Care among Diverse Populations](#)

Wednesday, December 17, 2014

2:00 pm – 3:00 pm Eastern (1:00 pm CT, 12:00 pm MT, 11:00 am PT)

To register for the *free* Webinar, [Click Here](#).

AHA Digital Campaign: AHA has [launched](#) a digital campaign to help patients and consumers better understand the evolving role of the nation's hospitals. The campaign website, www.AdvancingHealthinAmerica.org, features a video and other resources showing how hospitals are creating partnerships and programs that reach beyond their walls to improve community health and access to care. Patients, caregivers and others are encouraged to share their own stories with the campaign, part of a larger effort to communicate the importance of collaboration and proactive patient care – including behavioral health.

AHA Toolkit to Help Hospitals Hire Veterans: The AHA has issued a [toolkit](#) to help hospitals recruit and hire veterans with clinical and leadership skills into nursing, physician assistant and other hospital careers. Part of AHA's continued efforts in support of the federal [Joining Forces](#) initiative. It includes information on veterans' skills and transition assistance programs, employer best practices and potential community partners.

The [December Behavioral Health Update](#) includes, among other items, info on the [Physician Fee Schedule Final Rule](#), which improves access to telehealth services; the Joint Commission [Top Performers on HBIPS](#); and the [December 12th deadline](#) to comment on proposed National Quality Forum Behavioral Health Measures, and [much more](#). For additional resources, including resources on integrating physical and behavioral health services; go to the Section's website at www.aha.org/psych.

In Case You Missed It...

The Institute of Medicine committee has [recommended](#) that CMS should include 12 standard measures of social and behavioral determinants of health in its certification and meaningful use regulations for electronic health records. The measures pertain to 11 social and behavioral domains: race/ethnicity; education; financial resource strain; stress; depression; physical activity; tobacco use and exposure; alcohol use; social connections and social isolation; exposure to intimate partner violence; neighborhood and community compositional characteristics.

Happy Holidays

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