



CABINET FOR HEALTH AND FAMILY SERVICES  
DEPARTMENT FOR COMMUNITY BASED SERVICES

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### Contract Correspondence Transmittal (CCT)

<b>CCT Number:</b> 09-05	<b>Date of Issue:</b> November 10, 2009
<b>Division/Branch:</b> Protection and Permanency/OOHC	
<b>Key Words/Phrases:</b> Outsourced Therapeutic Services	
<b>Attachments/Forms:</b>	

Dear PCC/PCP Provider,

The Impact Plus Central Office has been conducting site reviews over the last several months. Several issues surrounding the billing of services provided to children in Therapeutic Foster Care (TFC) were discovered that were concerning. In order to address these concerns, a meeting was recently held that included representatives from the Department for Medicaid Services (DMS), Department of Behavioral Health, Developmental and Intellectual Disabilities (MHDDAS) and the Department for Community Based Services (DCBS) in order to both clarify the policies regarding the billing of these services and to determine a plan of action in order to bring all of our respective agencies into compliance. Please review the below clarifications carefully and proceed with the instructions provided if your agency is affected.

Policy Clarifications:

- 1). Both Impact Plus Therapeutic Foster Care services and PCP Therapeutic Foster Care services are funded through Medicaid and are considered to be all inclusive rates. All therapeutic/clinical services are expected to be provided by the TFC agency within the all inclusive rate.
- 2). A child who is placed in a PCP home should *NEVER* be receiving Case Management services from both the agency and another private provider. This is considered a duplication of services. In other words, a child placed in PCC or a PCP home should NOT be receiving case management services through Impact Plus. Case Management services are provided by DCBS.
- 3). As a general rule, a child placed with a PCP/PCC agency will receive all therapy services from that agency. The agency may choose to contract with an outside agency (CMHC or Impact Plus) to



provide all required therapy for a child for a variety of reasons including the existence of a pre-existing therapeutic relationship. This should be the exception rather than the rule, as PCC/PCP therapists should be trained and qualified to provide adequate therapeutic services in house. However, if clinical services are outsourced, the PCC/PCP must establish a written contract with the provider. The contract should include clearly defined expectations and a well established plan for communication between the PCP/PCC and the therapist. Because clinical services are built into the level of care rate, the PCP/PCC shall be responsible for payment of those services to the outside provider.

4). If a child who is placed with a PCC or PCP agency is in need of specialized therapeutic intervention that cannot be adequately addressed by the agency, an exception letter must be obtained that identifies the specific need and/or diagnosis of the child. The PCC/PCP will remain in control of the child's primary therapy and must continue to provide therapeutic services in order to maintain their per diem rate. Exceptions are only valid for Community Mental Health Centers.

#### New Procedures:

1). Effective immediately, all requests for exceptions for additional therapeutic services to be provided outside of what is covered in the per diem must first be sent to Central Office. [Julie.Cubert@ky.gov](mailto:Julie.Cubert@ky.gov) A request for exception should detail the specific need or specialized issue that would necessitate additional therapy services as well as an explanation of the agency's inability to provide the service. A copy of the child's treatment plan must be attached to the request. The request must also indicate the agency that would be providing the services. Exceptions are only valid for Community Mental Health Centers.

2). Effective immediately, any PCC/PCP agency that wishes to contract with a provider for therapeutic services must send a signed copy of the contract to DCBS. Prior authorization for Impact Plus therapeutic services should NEVER be requested through SHPS for PCC/PCP placed children. All payments should be made to the provider from the PCC/PCP agency.

If you have questions concerning this process, please contact [Julie.Cubert@ky.gov](mailto:Julie.Cubert@ky.gov)

Thank you for your support and partnership in this endeavor.

Sincerely,



Michael Cheek  
Director