



COMMONWEALTH of VIRGINIA

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MEMORANDUM

To: DBHDS Licensed Providers
From: Jae Benz, Director, Office of Licensing
Date: October 21, 2021
Re: December 1, 2021 Behavioral Health Enhancement (BHE) Licensed Services

Purpose: The purpose of this memorandum is to provide additional information related to the licensing process for the Project BRAVO services that become available for reimbursement through Medicaid on December 1, 2021.

Background: In accordance with the amended and reenacted 2020 Virginia Acts of Assembly, Chapter 56, Item 313.YYY. (2020 Appropriations Act), implementation of new enhanced behavioral health services under Project BRAVO began on July 1, 2021, with Mental Health Partial Hospitalization Program (MH-PHP), Mental Health Intensive Outpatient (MH-IOP), and Assertive Community Treatment (ACT). On December 1, 2021, the following, additional services will go into effect under Project BRAVO: Multisystemic Therapy, Functional Family Therapy, Mobile Crisis Response, Community Stabilization, 23-hour Crisis Stabilization, and Residential Crisis Stabilization Unit (RCSU) services.

To allow for the continuity of services and to limit administrative burden, all Project BRAVO services that become available for billing on December 1, 2021, will be nestled under overarching existing service licenses. This nestling strategy, particularly in the case of community-based crisis services, will allow individuals to transition through the subset of services offered by the same provider without the burden of adhering to requirements for transition and discharge planning between services. Additionally, nestling services will prevent providers from having to submit service modification applications, and consequently renewal applications, for additional services. Below is a revised crosswalk that outlines the service license a provider will be required to have in order to provide each of the Project BRAVO services that will become available December 1, 2021.

Service to License Crosswalk

Project BRAVO/ Enhancement Service	DBHDS License	DBHDS License Numbers
Mobile Crisis Response	Outpatient Srv /Crisis Stabilization	License #07-006
Community Stabilization	Outpatient Srv /Crisis Stabilization	License #07-006
23-Hour Crisis Stabilization	Outpatient Srv /Crisis Stabilization	License #07-006
Residential Crisis Stabilization Unit	MH Crisis Stabilization Srv	License #01-019 (adults) License #01-020 (children)
Multisystemic Therapy (MST)	Intensive-In-Home	License #05-001
Functional Family Therapy (FFT)	MH Outpatient Service	License # 07-003

Note that while Emergency Services/Crisis Intervention is not a stand-alone Project BRAVO service, the activities associated with Emergency Services will now be nestled under Outpatient Srv/Crisis Stabilization (License #07-006). The activities conducted by certified pre-screeners within Emergency Services will be eligible for reimbursement through the Department of Medical Assistance Services (DMAS) billing codes for Mobile Crisis Response and the details are available in the DMAS Mental Health Services Provider Manual, Appendix G, Comprehensive Crisis Services.

If a provider is already licensed for the overarching service (Outpatient Crisis/IIH/MH Outpatient), **no service modification will be required** to provide the additional services under the current service license. A provider who chooses to do this shall update the service description, staffing plan, staffing requirements, etc., to reflect that additional Project BRAVO services are provided under the current license. The Office of Licensing will confirm during the provider's next inspection or upon request that the appropriate revisions have been made, and that the service description meets the service definition as provided by DMAS.

If a provider is not already licensed for the overarching service (Outpatient Crisis/IIH/MH Outpatient), and would like to provide one of the December 1, 2021, Project BRAVO services, the provider must submit a service modification through the standard service modification process to add the service. Per the [October 6, 2021 memo](#), the CONNECT Provider Portal will be open on November 4, 2021, to any licensed providers who have completed the Provider Portal Training and received access to a secure and unique provider account. At that time, providers will be able to directly submit modification applications into the CONNECT Provider Portal that will send real-time notifications to the provider and the licensing specialist that the modification was received. Effective October 18, 2021, the Office of Licensing no longer accepts paper service modification applications. All service modifications must be entered through the CONNECT Provider Portal after November 4, 2021.

Completed service modifications associated with the December 1, 2021, Project BRAVO services will be prioritized for processing between November 5-30, 2021, so that new services can be ready for the DMAS December 1, 2021, effective date. Processing delays will occur if a provider fails to submit a completed service modification. Please note that service modifications may be denied if a provider is not in substantial compliance with regulations as evidenced by health and safety violations noted during recent inspections or investigations, or if there is a history of delayed responsiveness to licensing reports.

Please recall that a conditional license will be issued for each new service as part of the transition process. Pursuant to Code of Virginia [§ 37.2-415](#), a conditional license may be granted to a provider to operate a new service in order to permit the provider to demonstrate compliance with all licensing standards.

Below is a list of frequently asked questions related the Project BRAVO services that become available on December 1, 2021.

Please note: The answers provided below speak only to DBHDS licensure requirements and are not inclusive of additional requirements from DMAS and/or other DBHDS offices.

1. Are there service-specific licensing regulations for the December 1, 2021, Project BRAVO Services?

No, there are not service specific licensing regulations for the Project BRAVO Services that become available for reimbursement on December 1, 2021. Providers of the December 1, 2021, services are required to comply with the requirements within the current *Rules and Regulations for Licensing Providers by the Department of Behavioral Health and Developmental Services* (Chapter 105). While the [Amendments to align the General Regulations with Enhanced Behavioral Health Services](#) became effective July 1, 2021, the amendments contained in that emergency action consist of only those changes that were necessary to align the DBHDS Licensing Regulations with anticipated changes to Medicaid behavioral health regulations by removing provisions that would conflict with newly funded behavioral health services and establishing new licensed services for those newly funded behavioral health services that could not be nested under an existing DBHDS license. As stated above, all of the December 1, 2021, services will be nested under existing DBHDS licenses.

2. I am currently licensed to provide Intensive In-Home Services (#05-001) and would like to provide MST. Do I need to submit a service modification in order to do this?

No, if you are already licensed to provide Intensive In-Home Services, you do not need to submit a service modification in order to provide MST. Providers who wish to provide MST, and are already licensed to provide Intensive In-Home, shall revise their service description to include that MST will be provided as part of the service. Staffing requirements shall be amended to include proof of proper MST credentialing and staffing plans shall be amended to accommodate for MST team requirements. Your assigned licensing specialist will then review your service description, staffing plan, and staffing requirements during your next inspection to confirm the necessary components of MST have been included.

For providers who are not already licensed for Intensive In-Home, service modification applications will be reviewed to ensure that service descriptions, staffing requirements, and staffing plans have been amended as necessary to include proper requirements for MST including staff credentialing, prior to licensure.

3. I am currently only licensed to provide Intensive In-Home Services (#05-001) and would like to provide FFT. Do I need to submit a service modification in order to do this?

Yes, in order to provide FFT, providers need to have a Mental Health Outpatient License (#07-003). If you are not currently licensed to provide MH Outpatient, you will need to submit a service modification to add the MH Outpatient license. As you will be providing FFT, your service description, staffing plan, and staffing requirements should be appropriate for FFT.

For providers who are not already licensed for Mental Health Outpatient, service modification applications will be reviewed to ensure that service descriptions, staffing requirements, and staffing plans have been amended as necessary to include proper requirements for FFT, including staff credentialing, prior to licensure.

4. I am currently licensed to provide residential crisis stabilization services under #01-019. Does this mean I may provide RCSU services to both children and adults?

No, Adult RCSU providers shall be licensed by DBHDS as a provider of mental health residential crisis stabilization services for adults (#01-019).

Providers of Child RCSU services shall be licensed by DBHDS as a mental health residential crisis stabilization services for children and adolescents (#01-020).

Providers operating RCSUs for adults and children shall provide for the physical separation of children and adults, and shall provide separate group programming for adults and children pursuant to 12VAC35-105-580.G.

5. I am currently licensed to provide Outpatient Srv /Crisis Stabilization (#07-006). Do I need to submit a service modification to provide 23-Hour Crisis Stabilization, Community Stabilization, or Mobile Crisis Response?

All non-residential crisis services may be provided under the Outpatient Srv/Crisis Stabilization license. If you already have this license, you do not need to submit a service modification to provide one or more of the new Project BRAVO crisis services. However, your service description, staffing plan, and staffing requirements should be amended, to accommodate for these additional services. Your assigned licensing specialist will confirm these changes have been made during your next inspection.

Please note: 23-Hour Crisis Stabilization will be a site based service; therefore, the specific location must be approved and licensed. Providers who intend to provide 23-Hour Crisis Stabilization at a currently unlicensed location shall submit a service modification to add the location to their Outpatient Srv/Crisis Stabilization license and shall comply with the physical site requirement regulations within 12VAC35-105-260 thru 310. Compliance with these regulatory requirements will be assessed during the provider's next onsite inspection.

If a provider is already licensed for Outpatient Srv/Crisis Stabilization (#07-006) and the site for the 23-Hour Crisis Stabilization location is already a licensed location under the provider's existing #07-006 license, it is not necessary to submit a service modification to add a location.

6. I am currently licensed for Emergency Services/Crisis Intervention (#07-001). Can I continue to provide Emergency Services under this license?

No. Emergency Services/Crisis Intervention will now be provided under the Outpatient Srv/Crisis Stabilization (License #07-006). The activities conducted by certified pre-screeners within Emergency Services will be eligible for reimbursement through the DMAS billing codes for Mobile Crisis Response and the details are available in the DMAS Mental Health Services Provider Manual, Appendix G, Comprehensive Crisis Services. As previously stated, the Mobile Crisis Response service will be provided under the Outpatient/Crisis Stabilization overarching license.

For providers who are currently licensed to provide Emergency Services/Crisis Intervention, the Office of Licensing will be transferring the Emergency Services/Crisis Intervention license (#07-001) and/or locations to the Outpatient Srv/Crisis Stabilization (#07-006) prior to the CONNECT go-live date of November 3, 2021.

7. I am currently licensed to provide Outpatient Srv /Crisis Stabilization (#07-006). Do I need to submit a service modification to provide Residential Crisis Stabilization Services?

Yes, RCSU services may only be provided under License #01-019 for adults and License #01-020 for children. Therefore, you must submit a service modification to add the appropriate RCSU license to provide the service. In addition, please note, RCSU providers are subject to physical site requirements for center-based and residential services within 12VAC35-105-262 thru 380.

Please note: Residential Crisis Stabilization providers who intend to serve individuals as a result of a temporary detention order will need to submit a written plan for adequate staffing and safety measures to ensure that individuals under a TDO can receive services safely within the service. If the plan is approved, a stipulation will be added to the

provider's license authorizing the provider to serve individuals who are under a temporary detention order.

8. Are there any additional regulatory requirements for providers of 23-Hour Crisis Stabilization versus Mobile Crisis Response or Community Stabilization?

Yes, as 23-Hour Crisis Stabilization will be a site based service; therefore, the specific location must be approved and licensed. Providers who intend to provide 23-Hour Crisis Stabilization at a currently unlicensed location shall submit a service modification to add the location to their Outpatient Srv/Crisis Stabilization license and shall comply with the physical site requirement regulations within 12VAC35-105-260 thru 310. Compliance with these regulatory requirements will be assessed during the provider's next onsite inspection.

If a provider is already licensed for Outpatient Srv/Crisis Stabilization (#07-006) and the site for the 23-Hour Crisis Stabilization location is already a licensed location under the provider's existing #07-006 license, it is not necessary to submit a service modification to add a location.

For additional details on Project BRAVO and information on previously implemented enhanced behavioral health services, please see [BHE & ASAM Service Modification Memo](#) (April 2021) and [Memo Behavioral Health Enhancement and American Society of Addiction Medicine](#) (March 2021).

Please also see DMAS memos dated March 2, 2021; Enhanced Behavioral Health Services / Project BRAVO: Behavioral Health Redesign for Access, Value & Outcomes; May 7, 2021, "Project BRAVO: Behavioral Health Redesign for Access, Value & Outcome, Reimbursement Rates for New Enhanced Behavioral Health Services Effective July 1, 2021; and the new Mental Health Services Manual (Formerly Community Mental Health Rehabilitation Services Manual, June 10, 2021, "Project BRAVO: Service Authorizations Service Authorizations Transition Process and Requirements for Intensive Community Treatment (ICT) (H0039), Assertive Community Treatment (ACT) (H0040), Day Treatment/Partial Hospitalization (H0035 HB), Mental Health Partial Hospitalization Program (MH-PHP) (H0035) and Therapeutic Day Treatment (TDT) (H2016); October 15, 2021, "[Project BRAVO: Behavioral Health Redesign for Access, Value & Outcomes, New Enhanced Behavioral Health Services, Effective December 1, 2021 and Applied Behavior Analysis](#)" as well as the most recent version of the Mental Health Services (formerly CMHRS) Provider Manual. DMAS memos are available on the DMAS website at <https://www.virginiamedicaid.dmas.virginia.gov/wps/portal/>. DMAS manuals are available on the DMAS website at <https://www.virginiamedicaid.dmas.virginia.gov/wps/portal/ProviderManual>.

For general questions relating to the service modification process, please reach out directly to your assigned licensing specialist.