

## **Administrative/Regulatory Relief Work Group Meeting September 23, 2008**

Alexis Gadsden and Charles Monson thanked the members of the Administrative/Regulatory Relief Work Group for their continued interest and dedication as the group moves forward with its goal of increasing patient care and reducing administrative paperwork and also welcomed new members. Chuck also thanked Steve Hanson for continuing to serve as our expert Facilitator.

Chuck provided a brief overview of the Administrative/Regulatory Relief Work Group process for the new members, indicating that each of the work group's subcommittees are co-chaired by a provider representative and an OASAS staff person and distributed a listing of the work group's accomplishments to date. He also communicated the Commissioner's continued support, especially during the current fiscal situation.

One of the primary goals of this meeting was to summarize the progress of the three subcommittees, as follows:

- **Patient-Centered Regulatory Reform/Care and Documentation Subcommittee**
  1. Several group members presented the Gold Standard Partnership and an overview of the Part 822 – outpatient services revisions to the Governor's Advisory Council on Alcoholism and Substance Abuse Services. A positive response was received from the Council.
  2. An update was provided with regard to the status of the internal OASAS Part 822 workgroup's progress on the conceptual framework outline (which will recommend incorporating the delay in some of the required upfront paperwork to allow for patient engagement). Once the required outpatient regulations have been drafted, the revisions will be presented to providers as well as to the Administrative/.Regulatory Relief Work Group for review and comments. It is anticipated that the conceptual framework will also be presented to the Advisory Council in November.
  3. The OASAS Co-Chair advised the Work Group that the Part 822 outpatient immediate action items are currently at the Governor's Office of Regulatory Reform, should be released for a 45-day comment period shortly, and are expected to be finalized by the end of December.
  4. The Provider Co-Chair for the Part 819 Intensive Residential Services Subcommittee provided an update and distributed a hand-out on the subcommittee's progress.
  5. Four new subcommittees were developed, as follows:
    - **Part 815 – Patient Rights Subcommittee**  
OASAS Co-Chair – Joe Chelales  
Provider Co-Chair Susan Acosta (Daytop Village, Inc.)  
Mission: To review the regulations line by line to develop a guidance document to assist providers with compliance.

- **Case Record Review Subcommittee**  
 OASAS Co-Chair – Joe Chelales  
 Provider Co-Chair – Art Rosenthal (Rockville Centre - CONFIDE, Inc.)  
 Mission: To develop guidance documents (one for each service type) to assist providers in preparing for up-coming recertification reviews.
  
- **Core Competency Subcommittee**  
 OASAS Co-Chair – Joe Chelales  
 Provider Co-Chair – Debbie Pantin (Palladia, Inc.)  
 Mission: To develop cross training to address both core competencies and regulatory compliance.
  
- **Part 836 – Incident Reporting Subcommittee**  
 OASAS Co-Chair – Joe Chelales  
 Provider Co-Chair – Jeff Savoy and Maryanne Fielding  
 Mission: To review and provide comments on the Part 836 regulations to OASAS' Counsel before finalization.

6. Site Review Instruments and Model Case Records for Parts 817, 818 and 819 are in the process of being posted to the OASAS Website.

- **Unified Reporting Subcommittee**

1. In late July, the Office of Court Administration (OCA) delivered a presentation on its Unified Court System Drug Court Treatment Plan Progress form for the Unified Reporting subcommittee and other members of the Administrative/Regulatory Relief Work Group. Subsequently, the subcommittee decided that the OCA form would best suit their needs and the subcommittee was ready to proceed with recommending implementation of this form throughout the field. However, recent conversations with OCA determined that the form presented to the group in July had been under revision and the newly revised form (which is not yet active) would require a lot more detail than the previous form. In addition to adding administrative/paperwork time to the counselors' schedules, this newly revised form does not, as it stands now, conform to Part 815 – Patient Rights regulations.

Steve Hanson has agreed to take the lead in speaking with OCA regarding the implications with using the newly revised form.

- **OASAS Reporting Requirements Subcommittee**

1. The OASAS/Provider Co-Chairs decided to temporarily suspend the group, since no current issues have been raised. The OASAS Co-Chair will continue to follow the 4 priorities identified in the last quarterly meeting minutes, which are expected to be completed by April 2009.

2. The Director of the Bureau of Evaluation, Data Analysis and Decision Support presented planned changes to the PAS forms (Client Data System) which will become effective April 2009. Changes include administrative relief in case management reporting and vocational services reporting, as well as clarification of instructions. Additionally, 3 different tutorials, focusing on three areas (data entry, clinical and administrative) will be available to assist providers in reporting accurately.

- **Smart Records Subcommittee**

1. A new workgroup (Smart Records) was developed to focus on reducing patient case record documentation. Regional provider representatives will be brought together to re-examine their patient case record documentation utilizing the Technical Assistance Unit's model case record forms.

- **Smart Records Subcommittee**

- OASAS Co-Chair – Steve Hanson

- Provider Co-Chair – Richard Zwolinski (Liberty Behavioral Management)

- Mission: To develop a guidance document that will enable providers to review their own case record documentation to reduce their paperwork and remain in compliance with regulatory standards.

- **Miscellaneous Items Discussed**

1. A brief discussion ensued regarding "upper payment limits" and how it will affect Medicaid/Medicare billings for providers. The OASAS Associate Commissioner for Fiscal Administration joined the meeting to update the Work Group and informed them that a draft resolution calling for a moratorium was moving forward. Approximately 100,000 patients in our system may ultimately be affected if the moratorium is not put forth.
2. Chuck informed the Work Group that they received a Pre-Conference Institute slot for the ASAP conference that will be held in January 2009. It is Chuck's and Alexis' intention to focus this time to promote the Gold Standard Partnership and would like to have co-presentation with OASAS staff and Upstate/Downstate providers.

Each Subcommittee should report back any progress made by December 15, 2008 and the entire Work Group is scheduled to meet again in Albany on January 13th.