# Compromised Controls and Pace of Change Hampered Implementation of Enhanced Mental Health Services

A presentation to the Joint Legislative Program Evaluation Oversight Committee

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# Enhanced Mental Health, Developmental Disabilities and Substance Abuse Services — Phase I Team

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### **Evaluation Scope**

- Evaluation directed by Program Evaluation Division 2007-2008 Work Plan
  - Approved by Joint Legislative Program Evaluation
     Oversight Committee December 5, 2008
- Conduct a process evaluation of the implementation of the Enhanced Service Package
  - Compare implementation plans versus actual events
- Mental Health Phase II evaluation to focus on service outcomes
  - Report due by end of long session

#### Overview



- Mental Health Reform legislation passed in 2001 to transition from institutional to community based care
- New service array implemented in early 2006 aimed to broaden spectrum of care
- High utilization of individual community support services were unanticipated
- Lack of benchmarks, alerts and information management hindered oversight
- Recommendations focus on improving data analysis & strategic information management

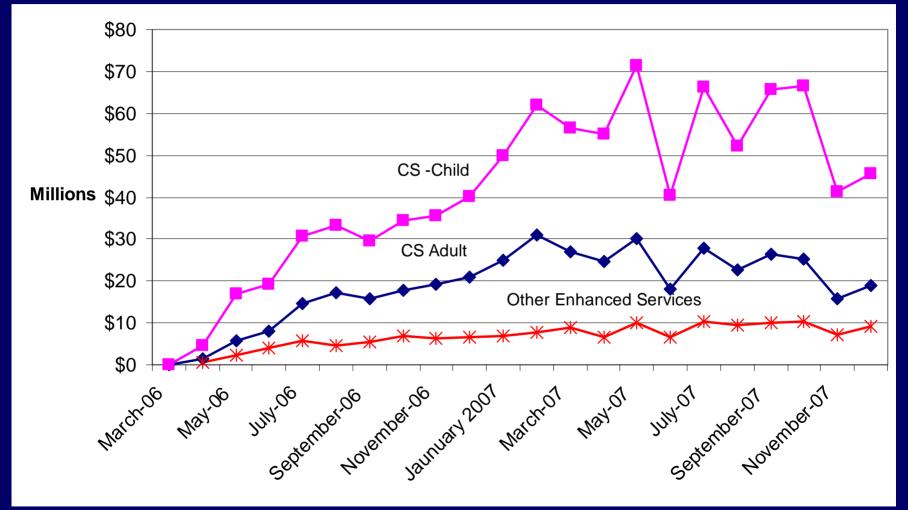
### Background - Key Players

- Centers for Medicare and Medicaid Services (CMS)
- Department of Health & Human Services (DHHS)
- Division of Mental Health, Developmental Disabilities & Substance Abuse Services (DMHDDSAS)
- Division of Medical Assistance (DMA)
- Value Options private, third party utilization review contractor
- Local Management Entities (LMEs)
- Providers

#### **Background - Enhanced MHDDSA Services**

- Services supposed to be evidence based, clinically proven, science based, and outcome focused models of best practice (HANDOUT)
- Offer greater range & depth of care across disability groups
- Approved in December 2005 & implemented in March 2006

### Community Support Services Cost More Than Other Enhanced Services



### **Background - DHHS Actions**

- Audit 167 providers & review of 12, 000 records
- Reviews found 36% of Community
   Support services not medically necessary
- DHHS actions:
  - Freeze on new providers
  - New service definition
  - Recoupment of payments

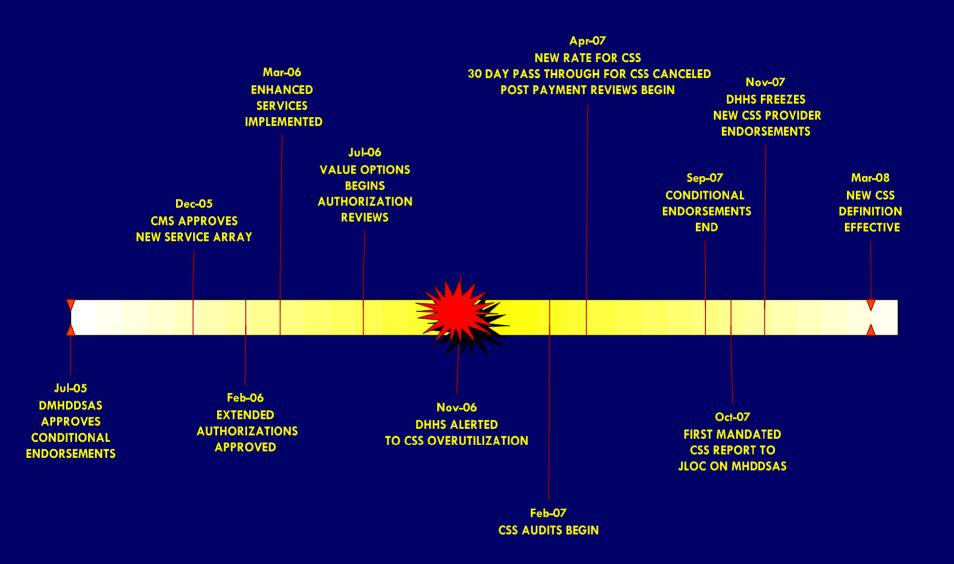
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### Finding: The pace and scope of implementation contributed to over-utilization



- Delay in federal approval of new services unanticipated
- After federal approval, NC had only three months to implement new services
- Implementation marked by multiple policy revisions, new legislation and new responsibilities

#### **Enhanced Services Implementation**



### Finding: Delay in determining who would provide authorization for services led to lack of front end controls

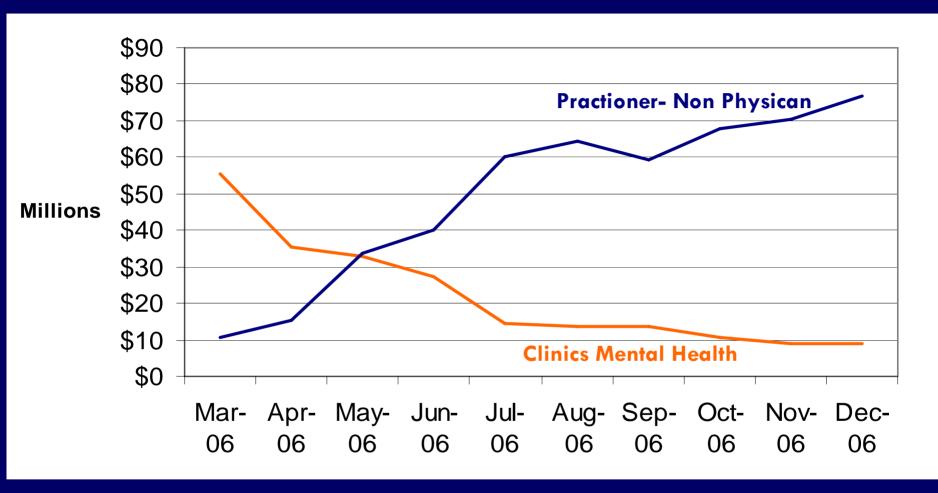
- Value Options not fully operational until summer of 2006
- Authorization requirements initially relaxed, no ability to track utilization until after services provided, claims filed
- Lag in claims data = four to six weeks

# Finding: During implementation DHHS did not forecast costs, capacity or utilization



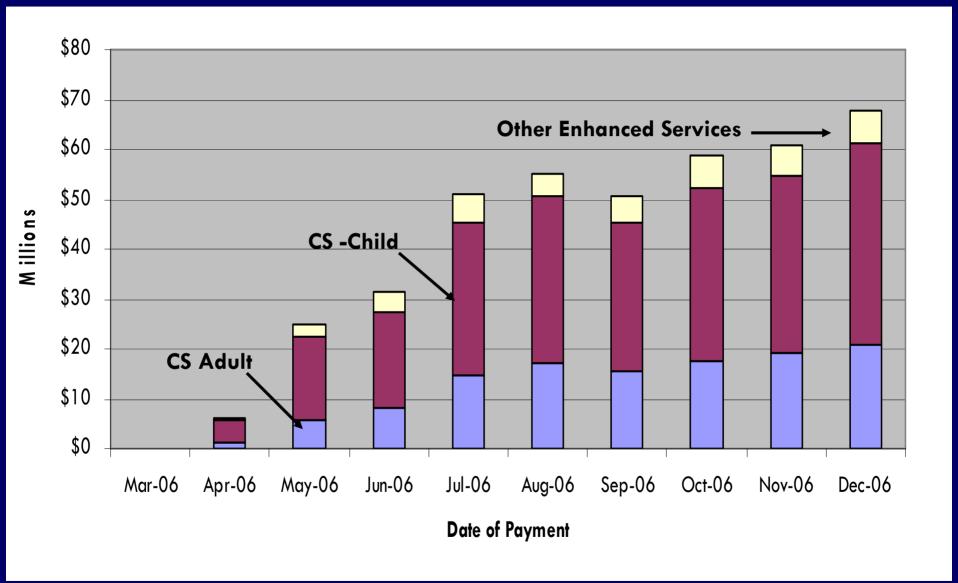
- Department surprised by rate of increase in service utilization
- Department's lack of prior experience with public/private model of service delivery & reform made forecasting challenging
- Financial data used to develop new service package not intended as projection of demand

#### **High Level Expenditure Tracking**



Because high level budget lines behaved as expected, drill down to specific services was not done. Inset shows breakdown of expenditures by individual service.

### **Expenditures by Individual Service**



### Finding: Data transfer problems prevented authorization and claims reconciliation

- Improper filing of authorization requests and duplicate requests hampered ability to conduct efficient reviews
- System communication problems impeded matching authorization requests with claims data
- LMEs should have had access to Medicaid claims data from March 2006
  - Access granted April 2007

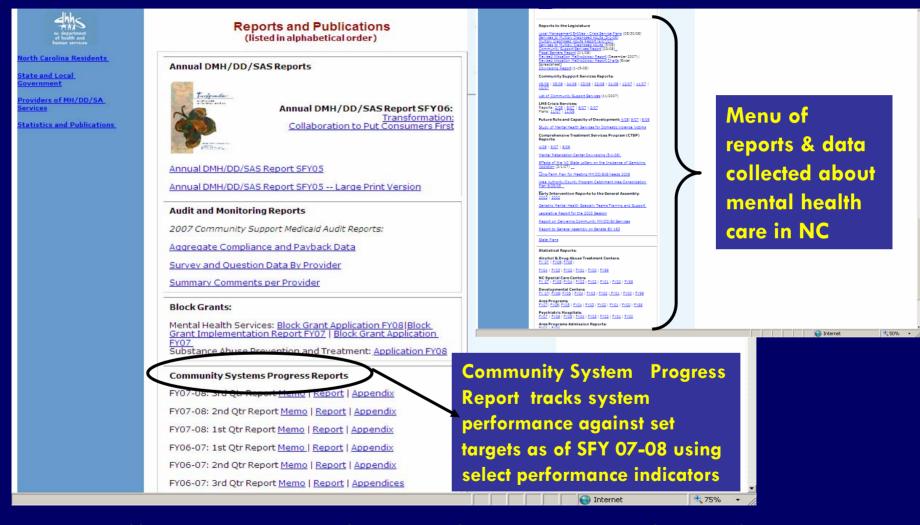
## Finding: Program information not communicated clearly or effectively



- Department collects a tremendous amount of data
- Lack of benchmarks, thresholds, alerts
- Data presented tends to be of a technical or descriptive nature that lacks synthesis and interpretation

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#### **NC Division of MHDDSA**



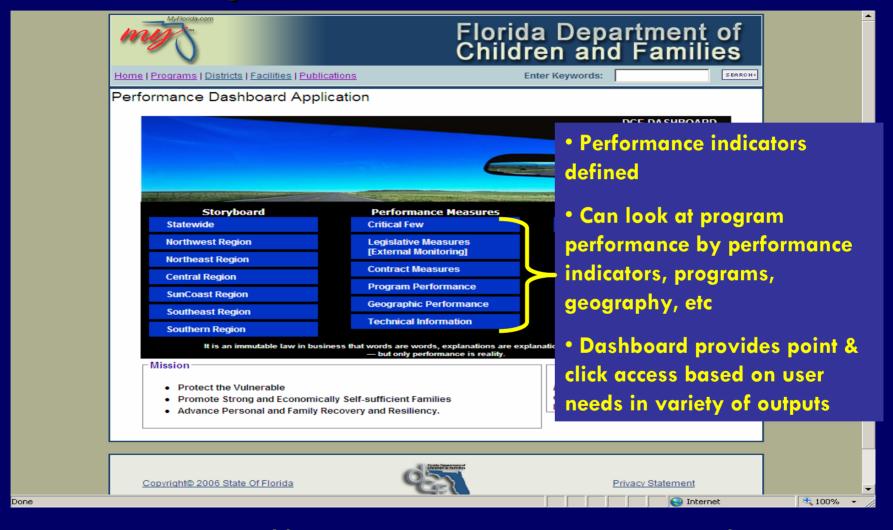
http://www.ncdhhs.gov/mhddsas/statspublications/reports/index.htm



Recommendation 1: Reevaluate data & reporting processes while assuring linkage & accessibility to supporting data, reports

- Review how information is presented
- Review number and format of reports
- Balance executive & legislative leadership's ability to access high level summary information as well as more detailed reports

#### Florida Department of Children & Families



http://dcfdashboard.dcf.state.fl.us/



### Recommendation 2: Require DHHS to redirect the mission of the Quality Management Team within the DMHDDSAS

- Focus division wide internal analyses within single office
- Enable prioritization of information gathering and data analysis
- Ensure data consistency, strong analytical capacity, and consistent reporting

### The Way Ahead



- Department should consider broader application of recommendations beyond the Division of MHDDSAS
- Develop dashboard reporting system
  - See Florida Department of Children and Families as an example
- Continue to develop knowledge management based decision making process