



Office of Mental Health

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ANN MARIE T. SULLIVAN, M.D.
Commissioner

MARTHA SCHAEFER
Executive Deputy Commissioner

To: Adult Behavioral Health HCBS Designated Providers
Personalized Recovery-Oriented Services Program Providers
NYS Health and Recovery Plans (HARPs)

From: NYS Office of Mental Health, Bureau of Rehabilitation Services and Care Coordination

Subject: Multi-Payer Group Services in OMH-Licensed PROS Programs and OMH-Funded Clubhouses and Psychosocial Clubs

Date: July 25, 2017

Memorandum

The following guidance outlines the requirements to co-mingle groups of PROS Program or Clubhouse/Psychosocial Club participants with adult (Behavioral Health Home and Community Based Services) BH HCBS recipients. There are two BH HCBS services which may be provided in a group setting when clinically appropriate and authorized by the Health and Recovery Plan: **Psychosocial Rehabilitation (PSR)** and **Family Support & Training**.

Depending on the subject and content of the specific group, the services provided in a Personalized Recovery-Oriented Services (PROS) program or Clubhouse/ Psychosocial Club may meet the requirements of PSR or Family Support and Training. Because of this, there may be times when it is appropriate to co-mingle individuals with different payers in such groups. However, certain steps must be taken to ensure that requirements are met for both the PROS program or Clubhouse/ Psychosocial Club and the BH Home and Community Based Services. These include:

- All of the requirements for both the BH HCBS service(s) and the PROS program have to be met. For PROS, this means the requirements outlined in 14 NYCRR Part 512. For the BH HCBS, it refers to the requirements articulated in the BH HCBS Provider Manual.
- An agency must be designated to provide BH HCBS Psychosocial Rehabilitation and/or Family Support and Training if they wish to co-mingle.

Guidelines for Co-Mingling in PROS or Clubhouse/Psychosocial Club

The provider agency should develop specific policies and procedures to ensure the following:

- ☐ The group facilitator must be familiar with the program and service requirements of both PROS or Clubhouse/Psychosocial Club and BH HCBS. The group facilitator must also understand the difference in how units are calculated for the services.
- ☐ The facilitator must meet the minimum qualifications and training requirements for both of the services being provided.
- ☐ Each group curriculum should be carefully reviewed to ensure compliance with respective requirements.



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- ☐ The rate billed for BH HCBS must reflect the total number of individuals in the group, including PROS attendees/collateral(s) or Clubhouse/Psychosocial Club attendees/collateral(s). In PROS programs, group sizes must be maintained per Part 512 regulations.
- ☐ The group facilitator's time spent preparing for the group, facilitating the group, facilitating the group, and documenting services must be proportionally split to match the facilitator's FTE dedicated to PROS versus BH HCBS. The PROS staffing plan should be kept up to date.
- ☐ The cost of physical space must be proportionally split between the PROS program or Clubhouse/Psychosocial Club and BH HCBS, as documented on the agency's CFR.
- ☐ Because documentation requirements vary, the group facilitator must meet all applicable documentation requirements for group participants, according to their payer group.

If you have any questions or concerns regarding co-mingling of BH HCBS participants in a PROS program or Clubhouse/ Psychosocial Club, please contact Liam McNabb at pros@omh.ny.gov or omh.sm.co.HCBS-Application@omh.ny.gov, or call the OMH Rehabilitation Services Unit at 518-473-8561.