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To: HSD-SubmitAComment

Subject: [EXT] Proposed Amendments to NMAC rule 8.321.2 - Public Comment

Submitted by the New Mexico Behavioral Health Providers Association, Maggie McCowen,
Executive Director

1. There is a lack of clarity in BMS Medicaid definition services related to education - special education, etc.
2. The Medicaid Provider due Process rules should be incorporated into NMAC and Medicaid policy
3. Need clarification in NMAC or Billing Manual about who/how provider can pursue certification for new services. For instance, there is apparently current confusion as to whether Respite is approved by CYFD or BHSD.
4. Only SUD patients/diagnoses are included in the inpatient IMD waiver. We advocate for broader inclusion of additional diagnoses.
5. CCSS training requirements appear to have removed grandfathering and are requiring state training only? This is a burden considering the class is only held one time every other month at UNM. This will bottleneck onboarding for agencies.
6. CPSW training access issues, CPSW is now requiring certification, however there is a heavy waitlist for this training which bottlenecks supply and demand. Recently BHSD advised Peer support worker could have lived experience and work in ACT while awaiting placement into class. Right now I have folks who have been waiting for 6 months for the class to open.
7. CCSS Supervisor criteria is Bachelor level only, however BHSD has recently given approval for supervisors with years of experience in lieu of degree, will this continue to be permitted?

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