



STATE OF WASHINGTON  
**HEALTH CARE AUTHORITY**

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September 16, 2019

**SUBJECT: Expectations for Behavioral Health Supplemental Transaction  
Data Collection and Reporting**

Dear Partners:

Thank you for your participation in the MCO/BH-ASO Data Follow-up Meeting on Monday, August 12, 2019. The purpose of this meeting was to discuss how to operationalize a strategy to collect and report non-encounter data, (i.e. behavioral health (BH) supplemental transactions), in order to comply with federal block grant reporting requirements and to meet state reporting needs.

At this meeting, the Managed Care Organizations (MCOs) and Behavioral Health-Administrative Service Organizations (BH-ASOs) requested that Health Care Authority (HCA) provide a letter detailing our expectations of the MCOs, BH-ASOs, and BH providers for collecting and reporting this data. This letter addresses HCA's expectations around: 1) which providers must report the data, 2) data completeness and accuracy, 3) training/technical assistance to support this effort, and 4) how HCA will ensure compliance with these data requirements and what the consequences are for non-compliance.

Which Behavioral Health Providers Will Need to Report BH Supplemental Transactions

HCA expects all contracted providers of mental health and/or substance use disorder services to collect and submit the BH supplemental transactions, with the exception of individual treatment practitioners practicing outside of a licensed behavioral health agency (BHA), including prescribers (i.e. buprenorphine providers). The requirement to collect and report this data is not dependent on the particular type or level of service; rather **all licensed and certified BHAs that are contracted with the MCOs/BH-ASOs should collect and report this data to the MCOs/BH-ASOs**. This is true regardless of the funding source of the contract between the MCO/BH-ASO and the BHA, so both "in-network" BHAs and "out-of-network" BHAs contracted with an MCO/BH-ASO through a single case agreement need to report this data. However, **BHAs that are not contracted with the MCOs/BH-ASOs are not required to report**.

HCA Standards for Data Completeness and Data Accuracy

HCA expects 100 percent of the BHAs described above to begin collecting BH supplemental transaction data by January 1, 2020. MCOs/BH-ASOs must begin submitting transaction data by April 1, 2020, for data going back to January 1, 2020. **The MCOs/BH-ASOs must submit the BH supplemental transactions to the Behavioral Health Data System (BHDS) within 30**

**calendar days of collection or receipt from providers. At least 80 percent of transactions must be successfully posted to the BHDS.** The MCOs/BH-ASOs must correct and resubmit any data that is rejected by the BHDS due to errors within 30 calendar days.

HCA plans to open the production environment for submission by January 2020. The test environment will be opened by December 2019. Each MCO/BH-ASO must assign one person responsible for managing the Secure File Transfer (SFT) account where you will be submitting data. To request a new SFT account or reset your password, or if you have any questions about setting up the SFT account, please contact the HCA Service Desk at [HCA servicedesk@hca.wa.gov](mailto:HCA servicedesk@hca.wa.gov). **Each MCO/BH-ASO will need to send at least one test batch of data no later than March 17, 2020. The test batch must include 100 transactions and at least 80 percent of those transactions must be posted successfully, otherwise the MCO/BH-ASO will need to do an additional test batch.**

While 80 percent of the overall BH supplemental transactions need be successfully posted to the BHDS, **HCA also requires 80 percent data completeness for each particular treatment episode.** This means that the MCOs/BH-ASOs need to report and successfully post at least 80 percent of all records for each individual client's treatment episode. In determining data accuracy, HCA looks at whether all of the data submitted makes sense for that particular client (i.e. any gaps in the treatment episode data, any missing client demographic data, etc.).

#### Expectations for Training and Technical Assistance

The MCOs/BH-ASOs are expected to work together to develop a systems solution for the collection and reporting of BH supplemental transaction data, and to standardize their data collection processes to minimize provider burden as much as possible. **As the lead entities required to submit BH supplemental transactions, HCA expects the MCOs/BH-ASOs to provide training and technical assistance to their contracted BHAs as needed** to ensure providers can begin collecting the data by January 1, 2020. As noted in previous communications, HCA will not be requiring the MCOs/BH-ASOs to submit historical data prior to January 1, 2020.

HCA is available to answer any questions and provide guidance on the updated BH Supplemental Transaction Data Guide. HCA will also work with the MCOs/BH-ASOs on setting up the SFT accounts and ensuring you can submit the transactions for testing no later than March 17, 2020, to the BHDS.

#### Enforcing the Data Requirements and Consequences for Not Collecting/Reporting the Data

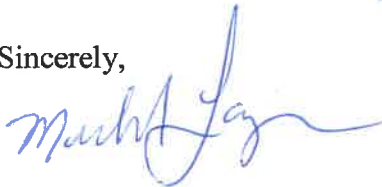
HCA is required to report BH supplemental transaction data to the federal Substance Abuse and Mental Health Service Administration (SAMHSA) to fulfill our federal block grant reporting requirements, as well as to meet other state reporting needs. We are currently in the process of updating our managed care and BH-ASO contracts to require the MCOs/BH-ASOs to collect and report this data to HCA. The contracts also include provisions to compel compliance with this reporting requirement, including sanctions for non-compliance. **If an MCO fails to maintain its reporting obligations under the contract, HCA can withhold a percentage of**

**payments/reimbursements to the MCO until the obligations are met, or terminate assignments and re-enrollments to the MCO. Alternatively, HCA can impose remedial actions on the BH-ASO, which could include corrective action, denial of any incentive payment to which the BH-ASO is otherwise entitled to under the contract, or termination of the contract for default.**

HCA understands that in order for the MCOs/BH-ASOs to comply with their data reporting requirements, the BHAs need to submit their data to the MCOs/BH-ASOs in a timely manner. To incentivize BHAs to report this data to you, we encourage you to work closely with your contracted providers and remind them that they must submit this data to you in order to meet federal block grant reporting requirements, and that failure to do so could jeopardize the state's receipt of these funds. HCA will continue to communicate this to BHAs as well. MCOs and BH-ASOs should also add language to their BHA subcontracts requiring submission of BH supplemental transactions; HCA will review subcontracts for these requirements during our annual monitoring visits in 2020.

Thank you for your continued work and collaboration on developing a systems solution for collecting and reporting BH supplemental transactions. Should you have any questions or additional concerns, please contact Michael Langer, Deputy Assistant Director, by telephone at 360-725-9821 or via email at [michael.langer@hca.wa.gov](mailto:michael.langer@hca.wa.gov).

Sincerely,



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Enclosure(s)

By email

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