

# **Certified Community Behavioral Health Clinics**

## **Florida Implementation Plan**

## Introduction

The 2023-2024 Florida General Appropriations Act included proviso language directing the Agency for Health Care Administration (Agency) to develop an implementation plan to add Certified Community Behavioral Health Clinic (CCBHC) services as a Medicaid covered service and deliver it to the Florida Legislature by September 1, 2023. CCBHCs are designed to provide timely access to a comprehensive range of mental health and substance use disorder services, improve care coordination, and facilitate integration with medical services. The proviso language also directed the Agency to submit a federal request to include CCBHCs as a covered Medicaid service by January 31, 2024. Specifically, the proviso language states,

*The Agency for Health Care Administration, in collaboration with the Department of Children and Families and community behavioral health providers that meet the federal Substance Abuse and Mental Health Services Administration criteria for certified community behavioral health clinics, shall develop a plan to implement certified community behavioral health clinics as a Medicaid covered service. The plan must include a process for certification, recommendations for Florida specific outcome measures and recommendations for a methodology for value-based payment. The Agency for Health Care Administration must complete the plan to implement by September 1, 2023, and submit a request for federal approval for Medicaid coverage of the certified community behavioral health clinic based on the plan no later than January 31, 2024.<sup>1</sup>*

The CCBHC model was created through the Protecting Access to Medicare Act of 2014 as a Medicaid Demonstration program. The Act established a federal definition and minimum criteria for CCBHCs. These criteria, operationalized by the U.S. Department of Health and Human Services' Substance Abuse and Mental Health Services Administration (SAMHSA), must be met for states to participate in the Medicaid CCBHC Demonstration. The Centers for Medicare and Medicaid Services (CMS) recognizes CCBHCs as a new provider type in Medicaid. As a recognized service, states can receive Medicaid federal financial participation (FFP) for CCBHC services through a (a) Medicaid Demonstration, (b) Medicaid State Plan

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<sup>1</sup> Florida [General Appropriations Act for Fiscal Year 2023-2024](#), page 65.

Amendment, or (c) Medicaid Waiver. States have greater flexibility if they choose to seek federal authority through a State Plan Amendment or Waiver.

The Agency will plan and implement the CCBHC model in Florida collaboratively with the Florida Department of Children and Families and community behavioral health representatives as partners. This implementation plan briefly describes Agency expectations for determining provider credentialing, provider reimbursement methodology, and the quality component of the program. The timeline in Table 1 identifies key tasks and milestones as well as Agency and partner responsibilities. The plan will be amended as needed throughout the implementation process.

### **Certification Process and Florida Specific Outcome Measures**

States are responsible for developing and maintaining a certification process to ensure CCBHCs meet minimum standards to qualify as a CCBHC provider. CCBHC criteria are established by SAMHSA in the key areas of staffing, availability and accessibility of services, care coordination, scope of services, quality reporting, and organizational governance. The Agency, Department, and behavioral health partners will establish Florida-based criteria that will consider SAMHSA criteria as well as needs unique to Florida. The Department's Office of Substance Abuse and Mental Health will be responsible for certifying CCBHCs based on these criteria. The Department will develop a certification process to assess and verify that interested providers are qualified to participate in the Florida Medicaid program as a CCBHC provider.

SAMHSA has likewise identified a set of outcome measures that must be used to monitor CCBHC performance and assess their impact. Like CCBHC qualifying criteria, states have the option to add additional outcome measures. The Agency and partners will assess how the SAMHSA outcome measures align with Agency goals and determine the best way to incorporate CCBHC quality components into the Florida Statewide Medicaid Managed Care (SMMC) program structure.

### **Payment Methodology**

CCBHC reimbursement methodology must be approved by CMS through a demonstration project, State Plan Amendment, or Waiver. The Agency, with partner input, will develop a

reimbursement methodology for qualified CCBHCs. The reimbursement methodology will project anticipated costs and savings and may consider quality-driven bonus payments to reward CCBHCs for achieving outcome targets. The Agency anticipates the payment methodology to be incorporated into the SMMC program. Actuarial services will be needed to assist the development of the reimbursement methodology. The Agency estimates \$750,000 to \$1,000,000 will be needed to contract for these services.

### **Federal Authority**

The Agency will initiate the federal approval process by January 31, 2024, to add CCBHC as a Medicaid covered service. The federal authority will include a description of CCBHC services, provider qualifications, and the methods and standards for establishing Medicaid reimbursement for CCBHCs services.

## Timeline

Table 1 lists CCBHC implementation tasks, milestones, and responsibilities to initiate CCBHC coverage and reimbursement effective January 1, 2025.

**Table 1. Implementation timeline and responsibilities**

Objectives	Action Steps	Responsible Parties*	Anticipated Completion Date
Implementation Report	Deliver CCBHC Implementation Report to the Florida Legislature	AHCA	September 1, 2023
CCBHC Leadership	Identify collaborating partners	AHCA	September 15, 2023
	Set planning meeting schedule and logistics	AHCA, DCF	September 30, 2023
Needs Assessment	Complete a needs assessment analysis by region to inform CCBHC service array	DCF, Community Partners	October 31, 2023
Services	Finalize service array to be required of CCBHCs	AHCA, DCF, Community Providers	November 30, 2023
Data Capacity	Determine Florida specific quality components	AHCA, DCF, Community Partners	December 31, 2023
	Develop data system for CCBHC reporting requirements	Agency, DCF, Community Partners	June 30, 2024
Certification	Determine Florida specific CCBHC certification criteria	AHCA, DCF, Community Providers	December 31, 2023
	Develop a Certification Process	DCF	April 30, 2024
	Initiate Certification process	DCF	September 30, 2024
System Updates (FMMIS)	Complete system updates to allow CCBHC enrollment	ACHA	November 1, 2024
	Complete system updates to allow CCBHC reimbursement	AHCA	December 31, 2024
Payment Methodology	Determine conceptual reimbursement methodology for CCBHCs	AHCA, DCF, Community Partners, Vendor	December 31, 2024
	Finalize reimbursement methodology	AHCA, Vendor	June 30, 2024
Federal Authority	Initiate request for federal authority to add CCBHC as a Medicaid service	AHCA	January 31, 2024
	Receive CMS Approval	AHCA	November 1, 2024

Objectives	Action Steps	Responsible Parties*	Anticipated Completion Date
State Authority	Submit necessary legislative language to provide AHCA and DCF authority and resources to implement CCBHCs	AHCA, DCF	August 1, 2024
	Begin CCBHC rule promulgation	AHCA	February 1, 2024
Program initiation	Begin coverage / reimbursement for CCBHC Medicaid services	AHCA	January 1, 2025 (or when authorized by Legislature, whichever is later)

\* AHCA – Agency for Health Care Administration; DCF – Department of Children and Families; Community Partners – community behavioral health representatives; Vendor – provider of contracted actuarial services