

Massa, Cody

From: Gayle Giese <giesegayle@gmail.com>
Sent: Friday, June 3, 2022 4:51 PM
To: solicitation.questions
Subject: RFI 014-21/22 Medicaid Managed Care. ATTN: Cody Massa
Attachments: AHCA RFI 014- 21-22 Medicaid Managed Care.docx; AHCA RFI 014- 21-22 Medicaid Managed Care redacted.docx

To: Cody Massa
Procurement Officer

Please see attached comments regarding RFI 014-21/22 Re-Procurement of the Statewide Medicaid Managed Care Program.

I have attached a redacted copy as well, but there is nothing confidential or personal in the original, so the redacted copy is identical.

Thank you for this opportunity to share suggestions for Florida's Medicaid Managed Care system.
-- Gayle Giese



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The Florida Mental Health Advocacy Coalition (FLMHAC) represents the voices of families and peers affected by behavioral health conditions. Many of us are members of our local NAMI (National Alliance on Mental Illness) or Mental Health America affiliates.

Medicaid is the largest provider of behavioral health services; therefore, we are interested in providing suggestions for Medicaid Managed Care systems improvements in Florida.

1. All Medicaid Managed Care Companies should ensure they have a sufficient number of behavioral health providers that are accepting new patients in all areas of the state. While Telehealth is acceptable and even favored by many, patients with serious mental illness often need to be seen in-person by their psychiatrists.
2. Behavioral health providers should be identified in the provider directories and include areas of specialty, ages of patients accepted and any other requirements to become a patient.
3. All Medicaid Managed Care Companies should list on their website, in their provider directories, and in any special mailings or text messages: a) The federal and state requirements for coverage of behavioral health care services; (b) Contact information for the Managed Care Company, including a hyperlink, for consumers to submit inquiries or complaints relating to the Medicaid Managed Care services; (c) Contact information to notify AHCA of any unresolved complaints related to Medicaid Managed Care behavioral health services.
4. Coverage of at least one mental health wellness check a year may prevent hospitalizations and other acute care.
5. There should not be a limitation on the number of therapy appointments allowed (covered) in a year as long as a qualified therapist is within the MMC network and available. Some patients will benefit from therapy once a week and this will prevent the need for more acute care.
6. Credential behavioral health Medicaid providers to work in primary care settings, including pediatric care.
7. Patients with social anxiety, paranoia, depression and other mental health conditions may not be able to endure long wait times to see a doctor. Please consider this when scheduling behavioral health *and other medical* appointments.
8. People with mental health conditions must strive to maintain good whole-body physical health. Particularly for those with serious mental illnesses and/or substance use, that is a challenge. Diabetes and smoking-related diseases are common for those with schizophrenia, for example. Having to navigate two systems and two locations – one for primary care and one for behavioral health care is difficult for those with SMI, who often fall into the “extremely low income” category and are struggling with psychiatric

symptoms. Work toward providing Whole Health Care wherever possible, providing mental health, substance use, and primary medical care in one setting. See: <https://www.chcf.org/wp-content/uploads/2020/09/CrackingCodesMedicaidReimbursingPsychiatricCollaborativeCare.pdf> and <https://www.hhs.texas.gov/sites/default/files/documents/collaborative-care-model-draft-public-comment.pdf>. Collaborative Care Management was just passed in Texas this year.

9. Ensure billing codes for behavioral health services are comprehensive and easy to follow. Provide training and a helpline to providers if needed.

10. Review reimbursement rates and consider increasing rates to be closer to reimbursement rates from commercial insurance. (Washington state just increased their Medicaid reimbursement rates by 7%.)

11. Serious mental illness lasts a lifetime, although people do move to various stages of recovery that vary between individuals. Medicaid Managed Care call-takers should be educated to understand the nature and treatment protocols for serious mental illness.

Submitted by:

Gayle Giese, President

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