

RCPA on PROMISE



About the Rehabilitation and Community Providers Association (RCPA):

With more than 300 members serving well over 1 million Pennsylvanians annually, Rehabilitation and Community Providers Association (RCPA) is among the largest and most diverse state health and human services trade associations in the nation. RCPA members offer mental health, drug and alcohol, intellectual and developmental disabilities, medical rehabilitation, and brain injury services for children and adults, vocational and residential settings. A statewide organization, RCPA advocates for those in need, works to advance effective state and federal public policies, and provides professional support to members. Learn more by visiting www.paproviders.org.

ISSUE

Over the past year, Pennsylvania providers across service lines have had increasing difficulties with the timely receipt from the state of needed PROMISE numbers. Specifically, to bill the Commonwealth or managed care organizations, providers need a state generated PROMISE number. Reports have ranged from six to nine, or even 12 month delays.

In addition, providers have noted that a great deal of time can elapse with no feedback, sudden questions or requests, and even new requests for already submitted material. This puts providers in a position where they can have a licensed service, and a wait list of individuals needing the service, but no mechanism to serve these people and submit billing.

The situation is magnified when the service in question is requested by the county or MCO, put in place by the provider to meet this need, but again with no ability to bill for the services. In such scenarios, it is also unclear under what circumstances a provider will be back paid if they go ahead and meet the needs of the consumers – often in an emergency situation.

There are typically two scenarios under which these problems occur:

1. The implementation of a new service needing a PROMISE number
2. A new location for an existing service needing a PROMISE number

With the latter, examples include moving an existing program across the street to a renovated building. Again, this simple change creates a situation with no ability to now bill for the service.

Part of the issue lies in manpower, or lack thereof, at the State. There are also apparent process issues, and applications touch too many departments and hands (e.g., ODP, OMHSAS, OMAP).

There are additional issues, such as the inability to bill two promise numbers from one location. This prevents a mental health provider from integrating a physical health service into their location at a time when nationally, best practices indicate the importance of bringing together these disciplines, especially for serious mental illness.

RCPA ACTION

RCPA has had numerous meetings with the past and current administrations about these PROMISE issues, detailing the position in which they put the providers, as well as the consumers and families. Specific case examples from RCPA providers have also been submitted and tracked.

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The meetings have included the secretary of DHS (then DPW), as well as the deputy secretaries of ODP and OMHSAS. The CEO of RCPA also sits on the state Medical Assistance Advisory Committee (MAAC), and has repeatedly raised this issue as being in need of immediate attention.

RESULT

On April 20, DHS Secretary Ted Dallas released an [update](#) to all PA Medicaid providers regarding "Provider Enrollment." This included changes in staffing, policies, and procedures, and the implementation of a new electronic enrollment capability by the fall of 2015. A simplified provider enrollment web portal is also coming. These changes should make a difference; clearly, the administration has heard and is reacting accordingly.

In addition, a commitment has been made to address the physical health/behavioral health integration concerns, in order to allow PA providers to develop innovative service approaches in this area.