

OMHSAS Deputy Secretary Jennifer Smith  
PO Box 2675, Harrisburg, PA 17105-2675

October 1, 2024

Dear Deputy Secretary Smith,

As DHS prepares to make an announcement on whether it intends to re-enter the SAMHSA CCBHC Demonstration project, RCPA, on behalf of all Integrated Care and Wellness Clinic (ICWC) providers, wants to express to the department the desire to return to the CCBHCs program. RCPA represents all six of the current ICWC providers, and has worked closely with OMHSAS over the last 18 months in reviewing the principles of a CCBHC / ICWC model transition.

Additionally, at the request of OMHSAS, RCPA confirmed and communicated to the department the providers' unanimous support in going back to the CCBHC model.

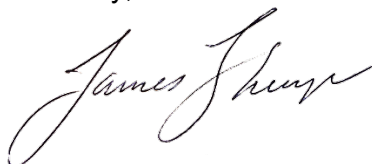
We offer the following considerations to support a return to the CCBHC demonstration project:

- While the CCBHCs may have expanded program requirements and metrics, we feel this would further support the state's vision of quality integrated whole-person care.
- SAMHSA has made available a Prospective Payment System (PPS) rate structure that Pennsylvania required for re-entry but also includes:
  - Easily achieved metrics for Quality Bonus Payments (QBP);
  - Additional funding for the delivery of crisis services; and
  - A per member per month PPS.
- Beyond September 2025, both the ICWCs and CCBHCs would have to be moved under a State Medicaid Funding blueprint:
  - Would future federal CCBHC funding offer potential enhanced opportunities for achieving increased state Medicaid funding as compared to the ICWC program?
- Even with CCBHC changes to the collection of measurement outcomes, the providers are confident they can implement these and any revised program criteria.

While the ICWCs have been a viable alternative to the CCBHCs, we feel the above mentioned points support a successful transition back to the project. It is with clear understanding that this will create a need for expanded department resources, but the providers are willing to partner in this "heavy lift," much in the same manner as when pivoting to the ICWCs. As part of this process, would OMHSAS be willing to go through a CCBHC recertification process over the next six months as part of an individualized ICWC program review, something we discussed in the technical assistance trainings?

In closing, RCPA and our represented ICWC agencies support Pennsylvania's return to the CCBHC model to ensure the delivery of quality integrated care with fiscal opportunities for program funding and eventual expansion.

Sincerely,

A handwritten signature in cursive script that reads "James Sharp".

Jim Sharp  
RCPA COO/Director of Mental Health Services

**On behalf of:**

Berks Counseling Center  
CenClear  
Northeast Treatment Services  
Pittsburgh Mercy  
Resources for Human Development  
The Guidance Center

CC: DHS Secretary Val Arkoosh