



MEMORANDUM

TO: All Pennsylvania Behavioral Health Choices Contractors and Business Partners

FROM: Valerie J. Vicari
Acting Deputy Secretary
Office of Mental Health and Substance Abuse Services

RE: Collaborative Documentation

DATE: February 20, 2020

MESSAGE:

This correspondence is being distributed regarding the use of Collaborative Documentation (CD) in behavioral health services in Pennsylvania. The Office of Mental Health and Substance Abuse Services (OMHSAS) supports the use and reimbursement of CD in the delivery of behavioral health services as an approach to further support transparency, engagement and active participation in person-centered treatment and recovery.

OMHSAS first published documentation in 2014 (Attachment A) that supports the use and reimbursement of CD. On January 15, 2015, following several stakeholder workgroup meetings on CD, OMHSAS published additional information and guidance (Attachment B) to further the implementation of CD across the state. Attachment B also contains recommended next steps identified to support provider implementation including the development of training and competency criteria and standards for CD. To further support implementation efforts in 2015, OMHSAS sponsored regional workshops related to Medicaid funded Certified Peer Specialist services and included information on the implementation of CD in Pennsylvania's behavioral health system.

Since 2015, the use of CD has expanded across the country and there are now abundant resources available to providers and other stakeholders to support the development of best practices and provider policies, procedures and monitoring related to CD. In Pennsylvania, CD has been implemented as an optional model in Certified Peer Specialist services and other services, especially as more providers have begun using electronic health records. Essentially, CD has become an adopted practice and has been successfully embedded in treatment as another therapeutic activity tool for behavioral health professionals.



After considerable review, OMHSAS does not currently intend to develop additional Pennsylvania specific standards, training or regulatory oversight regarding CD. Providers have the discretion to use CD. Each provider should make the decision based on the services provided if CD is appropriate for the service and the individuals who are receiving the service. OMHSAS will not be directing which services are appropriate or not appropriate for the use of CD. Since this is an elective tool to support collaboration and can be used at the discretion of the agency, a Bulletin will not be issued to direct the use of CD. For training or education needs regarding CD, the following national resources are available:

- **The National Council for Behavioral Health:**
https://mthcf.org/wp-content/uploads/2017/03/NatCon-Webinar-Patient-Centered-Documentation_2.4.19.pdf
- **U.S. Department of Health and Human Services', Substance Abuse & Mental Health Service Administration:**
https://www.integration.samhsa.gov/mai-coc-grantees-onlinecommunity/Breakout4_Collaborative_Documentation.pdf
- **The Institute for Research, Education and Training in Addictions:**
<https://ireta.org/resources/could-collaborative-documentation-be-the-next-big-and-effective-thing-in-behavioral-healthcare/>

There is not a specified billing code for CD because it is incorporated and used as part of the existing and ongoing identified services. Clinical documentation that supports the billing of a service remains the requirement in the individual's record. It is recommended that providers who plan to or have adopted CD should have clear policies and procedures implemented to support staff development, supervision and quality monitoring of CD as outlined in Attachment B.

Please direct any questions related to this memorandum to RA-OMHSASCorrespond@pa.gov.

Attachment A
Attachment B

c: Jamey Welty, Director
Bureau of Policy, Planning and Program Development, OMHSAS