



June 22, 2020

Wanda Davis, Rules Coordinator
Oregon Health Authority
500 Summer St SE
Salem, Oregon 97301

Dear Wanda,

Thank you for your work and consideration of this comment in response to the proposed rule for Intensive In-Home Behavioral Health Treatment (IIBHT). This comment represents the views shared by CCO Oregon members including health care payers and providers at recent behavioral health workgroup meetings. Our members may also submit comments on behalf of their individual organizations; here we highlight a few high-level concerns.

It is well understood by stakeholders and behavioral health leaders at the Oregon Health Authority that there are significant challenges to recruiting and maintaining teams of staff in rural and urban areas for various reasons. Obviously, the health care system is experiencing further constraints in keeping or recruiting staff due to the ongoing pandemic and economic downturn, which we will endure for some time. The proposed rule introduces further staffing and team specifications for care facilities in a time when the ability to maintain current staffing levels and specified team functions is unknown for many.

In particular, the proposed rule requires that IIBHT be available to all who request it 24 hours a day, seven days a week (24/7) necessitating a staffing model that is not economically viable in various facilities but perhaps especially those in rural and geographically-isolated areas. While the 24/7 expectation concerned all CCO Oregon members as unrealistic [especially with the lessons learned during COVID-19], it is particularly financially not viable for rural or smaller CCOs that may only have one or two IIBHT cases and therefore will not have sufficient revenue to dedicate staff to an IIBHT team for 24/7 access. For these reasons and more, it is unclear if the program as proposed in the rule would be scalable or amenable to per member per month contracts with providers.

Again, thank you for your work and consideration. We are happy to address any questions or provide any further information upon request.

Thank you,
Samantha Shepherd

Executive Director
CCO Oregon
928-699-1343
samantha@ccooregon.org

