John Bel Edwards
GOVERNOR

Rebekah E. Gee MD, MPH
SECRETARY

State of Louisiana

Louisiana Department of Health
Bureau of Health Services Financing

VIA E-MAIL ONLY

January 18, 2017

Ms. Sonya Nelson, CEO
Amerigroup
3850 N. Causeway Blvd., Suite 600
Metairie, LA 70002

Dear Sonya:

RE: Notice of Action Regarding Quarterly Specialized Behavioral Health Network Reports

It has come to my attention that Amerigroup (AMG) has failed to submit accurate quarterly Specialized Behavioral Health (SBH) Network Reports as required by contract.

Section 18.10 of the contract requires the submission of these deliverables in the report format prescribed by LDH. Quarterly SBH Network Report submissions must include data accurately reported according to SBH designated levels of care, SBH provider types, provider identification numbers, LDH administrative regions, service location addresses inclusive of parishes, and populations served. Medicaid Behavioral Health, in collaboration with the Office of Behavioral Health, incorporated this topic into the bi-weekly "MCO Touch Base Calls," in which AMG has attended, beginning July 29, 2016. LDH has provided additional aids and guidance relative to unacceptable network report submissions via a Specialized Behavioral Health Provider Types, Specialties and Taxonomies Grid (attached), which is included in the *MCO System Companion Guide,* as well as detailed feedback associated with AMG's Q2 SBH Network Reports (attached).

AMG failed to incorporate this feedback and guidance into their report submissions resulting in incorrect submissions of Q3 SBH Network Reports (attached). Per Section 20.3 of the contract, failure to submit accurate standing and ad hoc reports carries a monetary penalty of $2,000 per calendar day each report is late or deemed incorrect. AMG must submit accurate Q3 SBH Network Reports as set forth below to LDH in the format prescribed by LDH by **February 28, 2017.**

- Report 328 – Behavioral Health Provider Network Detail Report

- Report 336 – Behavioral Health Providers by Level of Care
- Report 338 – Behavioral Health Network Adequacy and GEO Access Review (Provider Type)
- Report 339 – Behavioral Health Prescriber Sufficiency Summary
- Report 348 – GeoAccess Mapping

If AMG cannot demonstrate compliance by **February 28, 2017,** penalties will be assessed in accordance with the contract terms outlined in the Table of Monetary Penalties as set forth below.

Standing and *Ad Hoc* Reports	Two thousand dollars ($2,000.00) per calendar day that a report is late or incorrect.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Steven Lazarus
Medicaid Deputy Director

SL/rm

Attachments

cc: Stacy Guidry
James Hussey, MD
Amanda Joyner
Robyn McDermott
Jen Steele
Darrell Montgomery
Kim Sullivan
File #: AMG2-02

Janet Yeboah

From:	Robyn McDermott
Sent:	Friday, October 21, 2016 4:12 PM
To:	Darrell Montgomery; Diane Leonard
Cc:	Carol Leven
Subject:	FW: LDH FEEDBACK for Q2 BH Network Reports: LDH Provider Network Report Response
Attachments:	LDH Gap Analysis.docx
Importance:	High

D and D,

In my opinion, this is an example of a gap analysis report and MCO response done right! Appreciate the detail AMG provided and the resolution activity appears appropriate. Hoping to see better provider identification and accuracy in #'s next round.

rm

From: Carol Leven
Sent: Friday, October 21, 2016 12:09 PM
To: Robyn McDermott
Subject: FW: LDH FEEDBACK for Q2 BH Network Reports: LDH Provider Network Report Response
Importance: High

Robyn – I was out Monday and I think I neglected to send this to you on my return.

From: Diane Leonard
Sent: Monday, October 17, 2016 12:45 PM
To: Carol Leven
Subject: FW: LDH FEEDBACK for Q2 BH Network Reports: LDH Provider Network Report Response
Importance: High

From: Chope, Kimberly M. [mailto:Kim.Chope@amerigroup.com]
Sent: Friday, October 14, 2016 5:07 PM
To: Diane Leonard
Cc: Mace, Jennifer S.; Buchanan, Fra C.; Devoe, Naomi; Nelson, Sonya K.
Subject: FW: LDH FEEDBACK for Q2 BH Network Reports: LDH Provider Network Report Response
Importance: High

Diane,
Attached you will find Amerigroup's Gap Analysis and Network Plan in response to #6 below.

If any additional information is needed, please do not hesitate to let us know.

Thank you,
Kim

Kim Chope | Director, Medicaid Contract and Compliance | Medicaid Business Unit
Amerigroup Louisiana, Inc, *an Anthem Inc. Company* | (☎) 850.619.1192

From: Diane Leonard [mailto:Diane.Leonard@LA.GOV]
Sent: Thursday, September 29, 2016 11:02 AM
To: Chope, Kimberly M.; Mace, Jennifer S.; Nelson, Sonya K.
Subject: LDH Provider Network Report Response
Importance: High

Good Morning,

Please find below and attached LDH's review regarding Provider Network Quarterly reports. Any comments, revisions and/or resubmissions are due by COB Friday, 10/14/2016. Thank You

1. Behavioral Health Provider Network Detail Report (328) – 2015 Q4, 2016 Q1, and 2016 Q2
   Not accepted; however resubmit not required for Q2. Report for Q3 must address concerns noted for Q2 report. See attachment.
2. Behavioral Health Providers by Level of Care (336) – 2015 Q4, 2016 Q1, and 2016 Q2
   Not accepted; however resubmit not required for Q2. Report for Q3 must address concerns noted for Q2 report. See attachment.
3. Behavioral Health Network Adequacy and Geo-Access Review Report (338) – 2015 Q4, 2016 Q1, and 2016 Q2
   Not accepted; however resubmit not required for Q2. Report for Q3 must address concerns noted for Q2 report. See attachment.
4. Behavioral Health Prescriber Sufficiency Summary (339) – 2015 Q4, 2016 Q1, and 2016 Q2
   Not accepted; however resubmit not required for Q2. Report for Q3 must address concerns noted for Q2 report. See attachment.
5. Behavioral Health Geo Access Density Summary (343) – 2015 Q4, 2016 Q1, and 2016 Q2
   Accepted
6. GeoAccess Mapping (348) – 2015 Q4, 2016 Q1, and 2016 Q2
   Conditional acceptance: Gap Analysis and network plan are needed by 10/14 to demonstrate how AMG will enhance member access to the following LOCs, which appear to fall below contractual access standards via the data provided:
   - ASAM Level III.3 - AMG should provide their gap analysis report for how they will enhance and develop their network for this level of care for both adult and adolescent populations to meet contractual access standards.
   - ASAM Level III.5 - AMG should provide their gap analysis report for how they will enhance and develop their network for this level of care for both adult and adolescent populations to meet contractual access standards.
   - ASAM Level III.7 - AMG should provide their gap analysis report for how they will enhance and develop their network for this level of care for members to meet contractual access standards.
   - ASAM Level III.7D - AMG should provide their gap analysis report for how they will enhance and develop their network for this level of care for members to meet contractual access standards.
   - PRTF - numbers are not consistent across AMG's network reports, therefore compliance with access standards cannot be determined; please review, revise and resubmit.
   - Prescribers – AMG should review their APRN numbers to ensure all APRNs reported actually have prescriptive authority.

Diane Leonard, LCSW
Medicaid Behavioral Health Services Section

Behavorial Health Compliance Officer

Diane.Leonard@LA.Gov
225-342-1417

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AMG SBHS NETWORK MONITORING REPORT - Q3						
#	ISSUE	TYPE	REPORT	RESUBMISSION DUE	REVIEW SENT	NOTES
1	Agencies as prescribers	PRESCRIBER	328	2/28/2017	1/18/2017	Agencies/Organizations/Facilities should not be denoted as prescribers. Only independent practitioners, those operating within a group and those on roster at an organization should be reported as prescribers. In addition, there are numerous duplicate entries, which need to be omitted. Please see Evangeline Family Medicine as an example. Please review, revise and resubmit.
2	Blank provider types	PRESCRIBER	328	2/28/2017	1/18/2017	There are 19 line entries, where providers are denoted as prescribers, yet no provider type is associated with them. Please review and correct.
3	Medical psychologists	PRESCRIBER	328	2/28/2017	1/18/2017	There are 26 line entries (9 unique providers) with a provider type noted as medical psychologists, however all indicate "N" for prescriber status. Is this correct?
4	Agencies as LMHPs	PROVIDER TYPE	328	2/28/2017	1/18/2017	Agencies/Organizations/Facilities should not be denoted as LMHPs or independent practitioner provider types. As an example, Evangeline Family Medicine is listed as an LCSW three separate times (all appear to be duplicates). If there is an LCSW on roster at this facility that AMG intended to report (or three LCSWs perhaps), the clinician's name and associated information (Medicaid ID, Network TIN, etc.) should be listed rather than the agency. AMG would then indicate "Roster Staff" under the LOC column for these practitioners. Caution: Please also check for duplicates that should be omitted when reviewing. Please review, revise and resubmit.
5	No data populated	LOC	328	2/28/2017	1/18/2017	There are numerous entries in the report with a blank LOC. All providers should have a LOC associated with them. In the event of a licensed professional on roster at an agency, please list "Roster Staff" under LOC as was requested in Q2 feedback. Licensed independent practitioners (not operating under an agency) should have LOC(s) associated with them.
6	Crisis Stabilization	LOC	328	2/28/2017	1/18/2017	There are 71 line entries (13 unique providers) associated with Crisis Stabilization level of care. Numerous are duplicates and should be removed; this also skews the number on AMG's 336 LOC report, which indicates 71 providers rendering this LOC. This is highly unlikely. As indicated in Q2 feedback to AMG, CS is the SPA service only introduced to the MCOs for delivery 9/2016 requiring explicit qualifications, provider types and licensing via LDH-Health Standards or DCFS. Please confirm that the providers listed as providing CS meet these requirements and that documentation of such is maintained in AMG's credentialing files on these providers. In the more likely event AMG's data for Crisis Stabilization is incorrect across reports, please review, revise and resubmit all impacted reports.

#	ISSUE	TYPE	REPORT	RESUBMISSION DUE	REVIEW SENT	NOTES
7	Failure to implement revisions requested in Q2	LOC	328	2/28/2017	1/18/2017	LDH requested AMG review and accurately report PRTF levels of care and provider types in all network reports, however this direction was neglected. As such, Q3 report reflects 43 providers with a PRTF LOC (duplicates are present). The Q3 336-LOC report indicates 36 providers rendering this LOC in the state and 338-Provider Type report indicates 37 providers associated with this provider type in the state. There are only five (5) licensed PRTFs in the state of LA. Please review, revise and resubmit all impacted reports. Should AMG have active contracts with 43, 36, 37 or any number over the five appropriately licensed providers to render PRTF level of care, please advise LDH immediately.
8	Failure to implement revisions requested in Q2	PROVIDER TYPE	328	2/28/2017	1/18/2017	The same is true for providers associated with a provider type of PRTF or PRTF-Addiction. Please review, revise and resubmit corrected reports.
9	Residential ASAM Levels for Adolescents	LOC	328	2/28/2017	1/18/2017	Are no providers contracted for these LOCs for adolescents? Please provide gap analysis and network plan to develop AMG network to meet member needs and contract requirements.
###	Blank provider types	PROVIDER TYPE	328	2/28/2017	1/18/2017	There should be no providers, either independent practitioners or agencies/facilities with a blank provider type field; please populate with accurate data. All provider entries must have appropriate SBHS provider types associated with them. (Direction given in Q2, however not addressed in Q3)
###	Mental Health Clinics	PROVIDER TYPE	328	2/28/2017	1/18/2017	AMG remains confused about differences between Mental Health Clinics (Legacy), Mental Health Rehab Agencies (Legacy) and Behavioral Health Rehab Agency provider types as evidenced by Q3 reporting. As indicated in Q2 feedback, Mental Health Clinic (Legacy) is a provider type reserved for the LGEs in each region. Please review, revise reporting and provider registries if applicable, and resubmit impacted reports.
###	Out-of-State Providers	STATE	328	2/28/2017	1/18/2017	Please provide a brief explanation regarding contracting with out-of-state providers (i.e. FL, NC, MS, GA, OH, TX, IA) for the delivery of CPST, Crisis Intervention (CI - rehab service), PSR, Outpatient SU, Outpatient Psych and Inpatient Psych. Is this done to address access or adequacy shortages for these SBH levels of care in state? How are these services delivered within Louisiana? Please provide detail. In addition, these providers are not "typed" accurately. Please review Q2 feedback on this issue and see additional notes under comments made for the 338 Provider Type Report. Please review provider types for each contracted provider in the 328 report and resubmit accurate data.
###	Not Accepted	DISPOSITION	328	2/28/2017	1/18/2017	This report is not accepted and requires review and correction.
###	OBH Recommendation	REMEDIATION	328	2/28/2017	1/18/2017	1) Resubmission of report **due February 28, 2017;** 2) Notice to Cure Letter; 3) Imposition of monetary penalties with failure to submit an accurate resubmission by deadline: $2,000 per calendar day that the resubmitted report is late or incorrect. (Contract Reference: 20.3.2 - Table of Monetary Penalties)
###	Crisis Stabilization	COUNTS	336	2/28/2017	1/18/2017	Please see notes on CS provided under Report 328 and correct all impacted reports.
###	Failure to implement revisions requested in Q2	OTHER	336	2/28/2017	1/18/2017	LDH requested AMG review and accurately report Crisis Stabilization in all network reports, however this direction was neglected.

#	ISSUE	TYPE	REPORT	RESUBMISSION DUE	REVIEW SENT	NOTES
###	Inconsistencies in data across reports	COUNTS	336	2/28/2017	1/18/2017	Due to inconsistencies of data across reports and identified errors in numbers of providers rendering LOCs depicted in this and other reports thus far, it is difficult to accept counts for any of the LOCs represented in this report. As another example of invalid data, the counts reported for PRTF LOC are unlikely to be accurate as AMG reports 12 distinct providers rendering this LOC in Region 4 and there are only 5 licensed PRTFs statewide. The numbers for ASAM Levels 1 and 3+ are under-reported.
###	Not Accepted	DISPOSITION	336	2/28/2017	1/18/2017	This report is not accepted and requires review and correction.
###	OBH Recommendation	REMEDIATION	336	2/28/2017	1/18/2017	1) Resubmission of report **due February 28, 2017;** 2) Notice to Cure Letter; 3) Imposition of monetary penalties with failure to submit an accurate resubmission by deadline: $2,000 per calendar day that the resubmitted report is late or incorrect. (Contract Reference: 20.3.2 - Table of Monetary Penalties)
###	Inconsistencies in data across reports	COUNTS	338	2/28/2017	1/18/2017	Data appears inconsistent across reports, therefore unsure what data is correct. As an example, report 339 indicates a total of 394 psychiatrists, however report 338 reflects a psychiatrist count of 386. Filtering for independent practitioners versus agencies denoted as psychiatrists in the 328 report indicates a total of 329 psychiatrists. Please review data across reports and ensure revisions are made resulting in valid and reliable reported information and counts.
###	Mental Health Clinics, Legacy MHR Agencies	COUNTS	338	2/28/2017	1/18/2017	AMG remains confused about differences between Mental Health Clinics (Legacy), Mental Health Rehab Agencies (Legacy) and Behavioral Health Rehab Agency provider types as evidenced by Q3 reporting. As indicated in Q2 feedback, Mental Health Clinic (Legacy) is a provider type reserved for the LGEs in each region. The counts provided by region are inaccurate in light of this distinction. In addition, there are no legacy MHCs out-of-state. There are no legacy MHR agencies out-of-state. Please provide rationale or a brief explanation relative to the contracting of out-of-state Substance Abuse and Alcohol Abuse Outpatient Centers. Please review, revise reporting and provider registries if applicable, and resubmit impacted reports.
###	Inconsistencies in data across reports	COUNTS	338	2/28/2017	1/18/2017	There are inconsistences across reports for provider types and levels of care reported. As an example, Report 338 indicates there are 492 unique LCSWs in Region 2. This information is not supported by comparison against other reports. Report 328 - Provider Detail identifies 182 LCSWs when filtered for Region 2 and duplicate providers removed. All data must be checked to ensure accurate reporting of the detailed information (report 328) as well as counts by region (reports 336, 338, 339) and GeoAccess mapping/reporting.
###	Not Accepted	DISPOSITION	338	2/28/2017	1/18/2017	This report is not accepted and requires review and correction.
###	OBH Recommendation	REMEDIATION	338	2/28/2017	1/18/2017	1) Resubmission of report **due February 28, 2017;** 2) Notice to Cure Letter; 3) Imposition of monetary penalties with failure to submit an accurate resubmission by deadline: $2,000 per calendar day that the resubmitted report is late or incorrect. (Contract Reference: 20.3.2 - Table of Monetary Penalties)

#	ISSUE	TYPE	REPORT	RESUBMISSION DUE	REVIEW SENT	NOTES
###	Inconsistencies in data across reports	COUNTS	339	2/28/2017	1/18/2017	APRNs: Review of this report indicates 101 distinct APRNs w/ prescriptive authority. However, when compared against report 328 Provider Detail, filtering for APRN and CNS as prescribers yields 77 distinct APRNs RX/CNSs. Psychiatrists: Review of report 339 reflects 394 distinct psychiatrists as prescribers. However, when compared against report 328 Provider Detail, filtering for psychiatrists (MD and DO) as prescribers yields 329 distinct psychiatrists. Medical Psychologists: There are 9 reported medical psychologists via the 339 report, however the 328 report reflects no medical psychologists as prescribers. It is unknown if the discrepancies in numbers are due to counting agencies as prescribers, duplicate entries, or some other factor. Please review data and correct impacted reports.
###	Not Accepted	DISPOSITION	339	2/28/2017	1/18/2017	This report is not accepted and requires review and correction.
###	OBH Recommendation	REMEDIATION	339	2/28/2017	1/18/2017	1) Resubmission of report **due February 28, 2017;** 2) Notice to Cure Letter; 3) Imposition of monetary penalties with failure to submit an accurate resubmission by deadline: $2,000 per calendar day that the resubmitted report is late or incorrect. (Contract Reference: 20.3.2 - Table of Monetary Penalties)
###	Psychiatrists	ACCESS	348	2/28/2017	1/18/2017	Mapping and reported data indicate access is met for this provider group for both urban and rural access standards per contract requirements. However, due to errors noted in other Q3 network reports, LDH is not confident the data/numbers reported in 348 are accurately calculated. Please provide source for information reported here, how this data is different than data reported in 328, 338, 339, etc. (if it is different), and methodology utilized to complete the report. Should review reveal access has not been met, please submit a gap analysis report and network development plan for addressing shortages. Note: If data/counts are accurate in Report 348, please note significant shortages (>25% membership without access) of psychiatrists in the following parishes: Lafourche, Acadia, St. James, Cameron, Catahoula, Concordia, West Carroll. Please comment.
###	Behavioral Health Specialists	ACCESS	348	2/28/2017	1/18/2017	If data/counts are correct, access has been met. Please review data in line with inconsistencies and errors found in other Q3 reporting and either confirm accuracy or resubmit with accurate data.
###	PRTF	ACCESS	348	2/28/2017	1/18/2017	The data reported for PRTFs is presumed inaccurate as there are only five (5) licensed PRTFs in the state. Please correct and resubmit. Should AMG's numbers on PRTFs prove accurate, please provide explanation with regard to contracting with unlicensed PRTFs and corrective action plan for remediating.
###	ASAM Levels 3.1, 3.3, 3.5, 3.7	ACCESS	348	2/28/2017	1/18/2017	Please review counts and data reported in light of inconsistencies and errors noted in other Q3 reports. If data reported in 348 - GeoAccess is correct, please submit a gap analysis report and network development plan for remediating access issues for these levels of care by population (adult, adolescent).
###	Not Accepted	DISPOSITION	348	2/28/2017	1/18/2017	This report is not accepted and requires review and correction.

#	ISSUE	TYPE	REPORT	RESUBMISSION DUE	REVIEW SENT	NOTES
###	OBH Recommendation	REMEDIATION	348	2/28/2017	1/18/2017	1) Resubmission of report **due February 28, 2017;** 2) Notice to Cure Letter; 3) Imposition of monetary penalties with failure to submit an accurate resubmission by deadline: $2,000 per calendar day that the resubmitted report is late or incorrect. (Contract Reference: 20.3.2 - Table of Monetary Penalties)

Report	Monitoring Review - AMG
328 Provider Detail	**Provider Type:** **Prescribers:** Some providers marked as prescribers show "Null" as the provider type. Please identify correct PT, revise and resubmit. All APRNs and CNSs indicate prescriber status. Not all APRNs and CNSs have the prescriptive authority privilege. Does AMG only contract with APRNs/CNSs with this privilege? Please review and ensure prescriptive authority documentation in the credentialing files of APRNs/CNSs noted as prescribers. Please check Dedra Lewis who has LPC noted in the prescriber column. Appears data was transposed in the adjacent column. **Null Provider Type:** There should be no providers, either independent practitioners or agencies/facilities with a provider type of "Null;" please populate with accurate data. **Behavioral Health Rehab Agency and Psych Spec:** These two provider types are duplicates of each other and do not denote separate types. Please revise those with the Psych Specialty addendum to Behavioral Health Rehabilitation Agency. **Crisis Receiving Center**: What LOCs do the two providers denoted as Crisis Receiving Centers render? **Duplicates:** Please check the report for duplicates and revise data to indicate unique field elements or delete duplicates. Ex: BRFHH Shreveport Hospital, which has same NPI, same Network TIN, but unique Medicaid Provider #'s; ACER is another; there are others; please explain or revise. **Crisis Receiving Centers/Respite Care:** How is AMG defining this PT? What LOCs do these providers render? This typing is reserved for those providers with the specialized licensing by LDH or DCFS for Crisis Stabilization and Respite Care (CSoC service). **PRTF:** There are 5 licensed PRTFs in the state, however only one of the providers denoted as PRTF is on the LDH licensed list (New Way of Southwest LA); are the other providers on AMG's list of PRTFs providing PRTF LOC as non-licensed facilities or is it possible these providers should be typed with another PT classification, e.g. SU Residential, etc.? Are they providing psychiatric services is a residential environment or perhaps ASAM residential services? **TGH:** Though denoted as TGH, these providers do not appear to be licensed through LDH as TGHs - Active Recovery, Gwangis Counseling, Loving Hearts. Are these providers operating TGHs without licensure?
	LOC: LMHPs, physicians: No LOCs are listed for LCSWs, LACs, LMFTs, LPCs, APRNs, psychologists, physicians, etc. If these are independent practitioners, please indicate each level of care the practitioner is contracted to provide; if they are roster staff of agencies, indicate the Network TIN for the agency(ies) they are associated with and denote "Roster Staff" in the LOC column.
	LOC: Not finding ASAM Levels of Care for adolescents, only adults. Are no providers contracted for these LOCs for adolescents? This conflicts with AMG's LOC report and GeoAccess mapping report.
	LOC: There are 51 line items denoting Crisis Stabilization LOC, numerous are duplicates and should be removed; this also skews the number on AMG's LOC report, which indicates 51 providers rendering this LOC. In addition, CS is the new SPA service only introduced to the MCOs for delivery 9/2016 requiring explicit qualifications, providing types and licensing via LDH-Health Standards or DCFS. Please confirm that the providers listed as providing CS meet these requirements and that documentation of such is maintained in AMG's credentialing files on these providers.

336 LOC	Numbers for PRTFs and Residential ASAM levels of care are not consistently reported, i.e., Provider Detail, Provider Type, GeoAccess Maps/Data and this report all differ in the numbers. Please review.
	Crisis Stabilization (CS) - see notes under Provider Detail Report. Please review.
	PRTF - see notes under Provider Detail Report. Please review, ensure requirements for this LOC are met including approp licensure and maintenance of these verifications are found in AMG's credentialing files. Please correct for Q3 if approp.
	TGH - see notes under Provider Detail Report and comments made associated with CS and PRTF above. Please review.
338 Provider Type	Behavioral Health Rehab Agency and BHRA (Psych Spec) are duplicative. These providers should be noted as Behavioral Health Rehab Agencies and the line noting psychiatric specialty should be deleted from the report.
	It appears as if AMG has confused the typing of Mental Health Clinics (reserved for the Legacy LGE clinics only), Behavioral Health Rehab Agencies, and Mental Health Rehab Agencies. These are all different provider types. Please review coding and records.
	Numbers for PRTF differ from that reported on GeoAccess maps/data. Please review.
	Respite Care Services Agency - please identify what LOCs are being provided by this provider type? These are specialized facilities requiring certain types of licensure from LDH or DCFS to render Crisis Stab or Short Term Respite (a CSoC only service). What services are being provided by these providers? Is it possible AMG misunderstood this provider type label?
339 Prescriber Sufficiency	Per data reported, AMG meets access standards for both rural and urban members to prescribers, however AMG should review their APRN numbers to ensure all APRNs reported actually have prescriptive authority (see notes in Provider Detail Report comments above). Should compliance with access standards change as a result, please correct in Q3 submission.
343 Density Summary	
	PRTFs - AMG should define what providers they are categorizing as PRTF as LDH-Health Standards only recognizes five providers/sites in the state on their licensure list and AMG has in excess of 20. If some of these are residential SU, these should be reflected in the appropriate ASAM level maps/data. Please review and explain. **Prescribers** - counts are inconsistent across AMG network reports, and APRN Rx needs to be reviewed and confirmed.

348 GeoAccess Mapping	**Gap Analysis:** Needed to demonstrate how AMG will enhance member access to the following LOCs, which appear to fall below contractual access standards via the data provided: ASAM Level III.3 - AMG should provide their gap analysis report for how they will enhance and develop their network for this level of care for both adult and adolescent populations to meet contractual access standards. ASAM Level III.5 - AMG should provide their gap analysis report for how they will enhance and develop their network for this level of care for both adult and adolescent populations to meet contractual access standards. ASAM Level III.7 - AMG should provide their gap analysis report for how they will enhance and develop their network for this level of care for members to meet contractual access standards. ASAM Level III.7D - AMG should provide their gap analysis report for how they will enhance and develop their network for this level of care for members to meet contractual access standards. PRTF - numbers are not consistent across AMG's network reports, therefore compliance with access standards cannot be determined; please review.

Service	Provider Description	PT	PS	PSS	Taxonomy	Taxonomy Description
Crisis Stabilization	Respite Care Services Agency/Center Based Respite	AE	8E		385HR2055X	Respite Care Facility, Mental Illness
	Crisis Receiving Center	AF	8E		261QM0801X	Ambulatory Health Care Facilities/Clinic/Center, Mental Health
Behavioral Health Rehabilitation Services	Mental Health Rehabilitation Agency **(Legacy MHR)**	77	78		251S00000X	Agencies Community/Behavioral Health
	Mental Health Clinic (Legacy MHC) - **Reserved for LGEs**	74	70	8E	261QM0801X	Ambulatory Health Care Facilities/Clinic/Center, Mental Health
	Behavioral Health Rehab Provider Agency **(Non-Legacy MHR)**	AG	8E		251S00000X	Agencies Community/Behavioral Health
	Assertive Community Treatment Team (ACT Services)	AA	8E		251S00000X	Agencies Community/Behavioral Health
	Multi-Systemic Therapy Agency (MST Services)	12	5M		251S00000X	Agencies Community/Behavioral Health
Therapeutic Group Home	Therapeutic Group Home	AT	5X		320800000X	Community Based Residential Treatment Facilities, Mental Illness
Addiction Services Outpatient	Substance Abuse and Alcohol Abuse Center (Outpatient)	68	70		261QR0800X	Ambulatory Health Care Facilities/Clinic/Center, Substance Use Disorder
	Mental Health Clinic (Legacy MHC) - **Reserved for LGEs**	74	70		261QM0801X	Ambulatory Health Care Facilities/Clinic/Center, Mental Health
	Licensed Addiction Counselor	AJ	8E		101YA0400X	Behavioral Health & Social Service Providers Counselor Addiction Substance Use Disorder
Psychiatric Residential Treatment Facility	Psychiatric Residential Treatment Facility	96	9B		323P00000X	Residential Treatment Facilities Psychiatric Residential Treatment Facility
	Psychiatric Residential Treatment Facility Addiction	96	8U		323P00000X	Residential Treatment Facilities Psychiatric Residential Treatment Facility
	Psychiatric Residential Treatment Facility Other Specialization	96	8R		323P00000X	Residential Treatment Facilities Psychiatric Residential Treatment Facility
	Psychiatric Residential Treatment Facility Hospital Based	96	8L		323P00000X	Residential Treatment Facilities Psychiatric Residential Treatment Facility
Psychiatric Inpatient	Free Standing Psychiatric Hospital	64	86		283Q00000X	Hospitals/Psychiatric Hospital
	Distinct Part Psychiatric Unit	69	86		273R00000X	Hospital Units/Psychiatric Unit
Outpatient Therapy	Mental Health Rehabilitation Agency **(Legacy MHR)**	77	78		251S00000X	Agencies Community/Behavioral Health
	Mental Health Clinic (Legacy MHC) - **Reserved for LGEs**	74	70		261QM0801X	Ambulatory Health Care Facilities/Clinic/Center, Mental Health
	Psychologist - Clinical	31	6A		103TC0700X	Behavioral Health & Social Service Providers/Psychologist, Clinical
	Psychologist - Counseling	31	6B		103TC1900X	Behavioral Health & Social Service Providers/Psychologist, Counseling
	Psychologist - School	31	6C		103TS0200X	Behavioral Health & Social Service Providers/Psychologist, School
	Psychologist - Developmental	31	6D		103TM1800X	Behavioral Health & Social Service Providers/Psychologist, Developmental
	Psychologist - Non-Declared (General)	31	6E		103T00000X	Behavioral Health & Social Service Providers/Psychologist
	Psychologist - Other	31	6F		103T00000X	Behavioral Health & Social Service Providers/Psychologist
	Medical Psychologist	31	6G		103TP0016X	Behavioral Health & Social Service Providers/Psychologist, Prescribing (Medical)
	Behavioral Health Rehab Agency **(Non-Legacy MHR)**	AG	8E		251S00000X	Agencies Community/Behavioral Health
	Substance Abuse and Alcohol Abuse Center (Outpatient)	68	70		261QR0800X	Ambulatory Health Care Facilities/Clinic/Center, Substance Use Disorder
	School Based Health Center	38	70		261QH0100X	Ambulatory Health Care Facilities/Clinic/Center, School Based Health Center
	Federally Qualified Health Center	72	42	8E	261QF0400X	Ambulatory Health Care Facilities/Clinic/Center, Federally Qualified Health Center
	Rural Health Clinic	79	94	8E	261QR1300X	Ambulatory Health Care Facilities/Clinic/Center, Rural Health
	Rural Health Clinic	87	94	8E	261QR1300X	Ambulatory Health Care Facilities/Clinic/Center, Rural Health
	Licensed Clinical Social Worker	73	73		1041C0700X	Behavioral Health & Social Service Providers/ Social Worker, Clinical
	Licensed Professional Counselor	AK	56		101YP2500X	Behavioral Health & Social Service Providers Counselor Professional
	Licensed Marriage and Family Therapist	AH	8E		106H00000X	Behavioral Health & Social Service Providers Marriage & Family Therapist
	Doctor of Osteopathic Medicine	19	26		2084P0800X	Allopathic & Osteopathic Physicians/Psychiatry
	Doctor of Osteopathic Medicine	19	27		2084N0400X	Allopathic & Osteopathic Physicians/Psychiatry and Neurology, Neurology
	Psychiatrist	20	26		2084P0800X	Allopathic & Osteopathic Physicians/Psychiatry
	Advanced Practice Registered Nurse	78	26		364SP0808X	Physician Assistants & Advanced Practice Nursing Providers/Clinical Nurse Specialist, Psychiatric/Mental Health
	Clinical Nurse Specialist	93	26		364SP0808X	Physician Assistants & Advanced Practice Nursing Providers/Clinical Nurse Specialist, Psychiatric/Mental Health
	Physician Assistant	94	26		364SP0808X	Physician Assistants & Advanced Practice Nursing Providers/Clinical Nurse Specialist, Psychiatric/Mental Health
Substance Use Residential	Substance Use Residential Treatment Facility	AZ	8U		324500000X	Residential Treatment Facilities Substance Abuse Rehabilitation Facility

Service	Provider Description	PT	PS	PSS	Taxonomy	Taxonomy Description	Additional Clarification
Behavioral Health Rehabilitation Services	Mental Health Rehabilitation Agency (Legacy MHR)	77	78		251S00000X	Agencies Community/Behavioral Health	1) Should be reserved for Legacy MHRs enrolled with Medicaid prior to managed care of Louisiana's specialized behavioral health services on 3/1/12. 2) MCOs may obtain a list of Legacy MHR Agencies through Medicaid. 3) Generally render one or more of the following services, though may also render outpatient therapy, etc. a) Psychosocial Rehab (PSR); b) Crisis Intervention (CI) – not to be confused with Crisis Stabilization (a licensed respite provider); c) Community Psychiatric Support & Treatment (CPST) - includes the EBPs FFT and Homebuilders. *
	Mental Health Clinic (Legacy MHC) - Reserved for LGEs	74	70	8E	261QM0801X	Ambulatory Health Care Facilities/Clinic/Center, Mental Health	1) Reserved for Local Governing Entities (LGEs) located in each Louisiana Department of Health (LDH) administrative region; sometimes referred to as Legacy Mental Health Clinics. 2) Clinics and service locations associated with: LDH Region 1 - Metropolitan Human Services District (MHD); LDH Region 2 - Capital Area Juman Services District (CAHSD); LDH Region 3 - South Central LA Human Services Authority (SCLHSA); LDH Region 4 - Acadiana Area Human Services District (AAHSD); LDH Region 5 - Imperial Calcasieu Human Services Authority (ICHSA); LDH Region 6 - Central LA Human Services District (CLHSD); LDH Region 7 - Northwest LA Human Services District (NWLHSD); LDH Region 8 - Northeast Delta Human Services Authority (NDHSA); LDH Region 9 - Florida Parishes Human Services Authority (FPHSA); and LDH Region 10 - Jefferson Parish Human Services Authority (JPHSA).
	Behavioral Health Rehab Provider Agency (Non-Legacy MHR)	AG	8E		251S00000X	Agencies Community/Behavioral Health	1) Will not be enrolled with Medicaid as Legacy MHRs. 2) Generally render one or more of the following services, though may also render outpatient therapy, etc. a) Psychosocial Rehab (PSR); b) Crisis Intervention (CI) – not to be confused with Crisis Stabilization (a licensed respite provider); c) Community Psychiatric Support & Treatment (CPST) - includes the EBPs FFT and Homebuilders. *
Outpatient Therapy	Mental Health Rehabilitation Agency (Legacy MHR)	77	78		251S00000X	Agencies Community/Behavioral Health	1) Should be reserved for Legacy MHRs enrolled with Medicaid prior to managed care of Louisiana's specialized behavioral health services on 3/1/12. 2) MCOs may obtain a list of Legacy MHR Agencies through Medicaid. 3) Generally render one or more of the following services, though may also render outpatient therapy, etc. a) Psychosocial Rehab (PSR); b) Crisis Intervention (CI) – not to be confused with Crisis Stabilization (a licensed respite provider); c) Community Psychiatric Support & Treatment (CPST) - includes the EBPs FFT and Homebuilders. *
	Mental Health Clinic (Legacy MHC) - Reserved for LGEs	74	70		261QM0801X	Ambulatory Health Care Facilities/Clinic/Center, Mental Health	1) Reserved for Local Governing Entities (LGEs) located in each Louisiana Department of Health (LDH) administrative region; sometimes referred to as Legacy Mental Health Clinics. 2) Clinics and service locations associated with: LDH Region 1 - Metropolitan Human Services District (MHD); LDH Region 2 - Capital Area Juman Services District (CAHSD); LDH Region 3 - South Central LA Human Services Authority (SCLHSA); LDH Region 4 - Acadiana Area Human Services District (AAHSD); LDH Region 5 - Imperial Calcasieu Human Services Authority (ICHSA); LDH Region 6 - Central LA Human Services District (CLHSD); LDH Region 7 - Northwest LA Human Services District (NWLHSD); LDH Region 8 - Northeast Delta Human Services Authority (NDHSA); LDH Region 9 - Florida Parishes Human Services Authority (FPHSA); and LDH Region 10 - Jefferson Parish Human Services Authority (JPHSA).
	Behavioral Health Rehab Agency (Non-Legacy MHR)	AG	8E		251S00000X	Agencies Community/Behavioral Health	1) Will not be enrolled with Medicaid as Legacy MHRs. 2) Generally render one or more of the following services, though may also render outpatient therapy, etc. a) Psychosocial Rehab (PSR); b) Crisis Intervention (CI) – not to be confused with Crisis Stabilization (a licensed respite provider); c) Community Psychiatric Support & Treatment (CPST) - includes the EBPs FFT and Homebuilders. *

** Evidenced Based Practices under CPST consist of: Assertive Community Treatment (ACT), Functional Family Therapy (FFT), Homebuilders and Multi-Systemic Therapy. ACT and MST have their own PT/PS codes; providers rendering these services should be coded accordingly as depicted in the State Coding Grid (Tab 1).*