

2020 Provider Network Development Plan

Complete and submit in **Word** format (**not PDF**) to Performance.Contracts@hhsc.state.tx.us no later than April 30, 2020.

All Local Mental Health Authorities and Local Behavioral Health Authorities (LMHA/LBHAs) must complete Part I, which includes baseline data about services and contracts and documentation of the LMHA/LBHA's assessment of provider availability, and Part III, which documents PNAC involvement and public comment.

Only LMHA/LBHAs with interested providers are required to complete Part II, which includes procurement plans.

When completing the template:

- ◆ Be concise, concrete, and specific. Use bullet format whenever possible.
- ◆ Provide information only for the period since submission of the 2018 Local Provider Network Development Plan (LPND Plan).
- ◆ When completing a table, insert additional rows as needed.

NOTES:

- This process applies only to services funded through the Mental Health Performance Contract Notebook (PCN); it does not apply to services funded through Medicaid Managed Care. Throughout the document, data is requested only for the non-Medicaid population.
- The requirements for network development pertain only to provider organizations and complete levels of care or specialty services. Routine or discrete outpatient services and services provided by individual practitioners are governed by local needs and priorities and are not included in the assessment of provider availability or plans for procurement.

PART I: Required for all LMHA/LBHAs

Local Service Area

A. Provide the following information about your local service area. Most of the data for this section can be accessed from the following reports in MBOW, using data from the following report: 2018 LMHA/LBHA Area and Population Stats (in the General Warehouse folder).

Population	1,958,841	Number of counties (total)	1
Square miles	1,240	♦ Number of urban counties	1
Population density	1,580	♦ Number of rural counties	0

Major populations centers (add additional rows as needed):

Name of City	Name of County	City Population	County Population	County Population Density	County Percent of Total Population
San Antonio	Bexar	1,532,223	1,958,841	1,580	100%

Current Services and Contracts

- B. Complete the table below to provide an overview of current services and contracts. Insert additional rows as needed within each section.
- C. List the service capacity based on FY 2019 data.
- For Levels of Care, list the non-Medicaid average monthly served. (Note: This information can be found in MBOW, using data from the following report in the General Warehouse folder: LOC-A by Center (Non-Medicaid Only and All Clients).
 - For residential programs, list the total number of beds and total discharges (all clients).
 - For other services, identify the unit of service (all clients).

- d) Estimate the FY 2020 service capacity. If no change is anticipated, enter the same information as Column A.
- e) State the total percent of each service contracted out to external providers in 2019. In the sections for Complete Levels of Care, do not include contracts for discrete services within those levels of care when calculating percentages.

	FY 2019 service capacity (non-Medicaid only)	Estimated FY 2020 service capacity (non-Medicaid only)	Percent total non-Medicaid capacity provided by external providers in FY 2019*
Adult Services: Complete Levels of Care			
Adult LOC 1m	0	0	39.38 %
Adult LOC 1s	3,176	3176	39.38 %
Adult LOC 2	172	172	39.38 %
Adult LOC 3	675	675	39.38 %
Adult LOC 4	47	47	39.38 %
Adult LOC 5	42	42	39.38 %

Child and Youth Services: Complete Levels of Care	FY 2019 service capacity (non-Medicaid only)	Estimated FY 2020 service capacity (non-Medicaid only)	Percent total non-Medicaid capacity provided by external providers in FY 2019*
Children's LOC 1	22	22	99.91%
Children's LOC 2	119	119	99.91%
Children's LOC 3	64	64	99.91%
Children's LOC 4	1	1	99.91%
Children's CYC	7	7	99.91%
Children's LOC 5	2	2	99.91%

Crisis Services	FY 2019 service capacity	Estimated FY 2020 service capacity	Percent total capacity provided by external providers in FY 2019*
Crisis Hotline	29,292	29,300	100%
Mobile Crisis Outreach Team	3,040	3,050	0
Other (Please list all PESC Projects and other Crisis Services):	3,486	3,500	0
PESC hospital services			
PPB hospital services	1,621	1,650	100%
Respite	463 discharges	475 discharges	0

*D. List **all** of your FY 2019 Contracts in the tables below. Include contracts with provider organizations and individual practitioners for discrete services. If you have a lengthy list, you may submit it as an attachment using the same format.*

- a) In the Provider column, list the name of the provider organization or individual practitioner. The LMHA/LBHA must have written consent to include the name of an individual peer support provider. For peer providers that do not wish to have their names listed, state the number of individuals (e.g., “3 Individuals”).*
- b) List the services provided by each contractor, including full levels of care, discrete services (such as CBT, physician services, or family partner services), crisis and other specialty services, and support services (such as pharmacy benefits management, laboratory, etc.).*

Provider Organizations	Service(s)
Avail Solutions, Inc.	Crisis Intervention Helpline Services
Beyond Limits, LLC	Recreation Therapy – Youth Empowerment Services (YES) Waiver Program
Clarity Child Guidance Center	Child & Adolescent Psychiatric Inpatient Services
Counseling Link, LLC	Art Therapy, Community Living Supports, Music Therapy & Recreation Therapy – Youth Empowerment Services (YES) Waiver Program
East Texas Behavioral Health Network (ETBHN)	Adult Psychiatric Telemedicine Services
Excel...Rise Above the Rest	Child & Adolescent Outpatient Services – Texas Resiliency & Recovery (TRR)

	Services: Level of Care (LOC) 1, 2, and 3
Imagine Therapies, LLC	Community Living Supports, Music Therapy & Recreation Therapy – Youth Empowerment Services (YES) Waiver Program
Insight Telepsychiatry, LLC	Adult Telepsychiatric Telemedicine Services
JSA	Adult Telepsychiatric Telemedicine Services
LocumTenens.com	Adult and Child Telepsychiatric Telemedicine Services
Mental Health Mental Retardation Authority of Harris County	Crisis Intervention Helpline Services
Metrocare	Pharmacy Services
NIX Hospital Systems, LLC	Adult Inpatient Beds and Crisis Stabilization Unit
Prosumers International	Consumer Operated Services Program
Region 20 Educational Service Center	Mental Health First Aid
San Antonio Behavioral Hospital	Child & Adolescent Psychiatric Inpatient Services
Southwest General Hospital	Adult Psychiatric Inpatient Services

Individual Practitioners	Service(s)
None	N/A

Administrative Efficiencies

E. Using bullet format, describe the strategies the LMHA/LBHA is using to minimize overhead and administrative costs and achieve purchasing and other administrative efficiencies, as required by the state legislature (see Appendix C).

A. Adopting, Implementing and Upgrading EHR

CHCS is seeking an EHR system with integrated capabilities to increase the quality of care, tracking and communicate outcomes by sharing patient data and client information between behavioral, primary care, substance use and IDD providers.

- B. Reducing Wait Times/Improving Accessibility and Availability**
 - i) Implementing centralized scheduling and intake, increasing access to services
 - ii) Implemented Same Day/Next Day enrollment services to improve utilization of CHCS resources and eliminating No-show and cancellations.
 - iii) Implementing Just in Time Scheduling to reduce time to provider appointments to no longer than 5 days
- C. Centralizing and Standardizing Front and Back Office Functions**
Ensuring that consistent day to day operations are applied at all clinics, including uniform workflows and procedures with the goal of providing and excellent customer experience while preventing lost revenue opportunities.
- D. Centralized Health Information Management**
Ensuring that all pertinent information workflows are consistent across clinics and information is available to the CHCS clinical workforce to improve quality of care and outcomes.

F. List partnerships with other LMHA/LBHAs related to planning, administration, purchasing, and procurement or other authority functions, or service delivery. Include only current, ongoing partnerships.

Start Date	Partner(s)	Functions
August 2011	CHCS is a member of Tejas Health Management (Tejas) a Non-Profit Association formed to increase the efficiency, access, and service potential for Community Centers and other participating providers throughout Texas. Member centers include; Austin Travis County Integral Care, Bluebonnet Trails Community Services, Emergence Health Network, Hill Country MHDD Centers, Tropical Texas Behavioral Health.	Population Health Management IT Products and Services Business Consulting Healthcare Market Research and Support
August 2018	Bluebonnet Trails Community Services	Referrals for treatment and services for adult women and men with a substance abuse disorder or dually diagnosed with co-occurring psychiatric and substance abuse disorders and their children who meet the criteria for services.
September	Hill Country MHDD Centers	Referrals for treatment and services for adolescents and

2019		<p>children who meet criteria for Youth Empowerment Service (YES) Waiver.</p> <p>Referrals for treatment and services for adult women and men with a substance abuse disorder or dually diagnosed with co-occurring psychiatric and substance abuse disorders and their children who meet the criteria for services.</p>
September 2019	Camino Real Community Services	Referrals for treatment and services for adult women and men with a substance abuse disorder or dually diagnosed with co-occurring psychiatric and substance abuse disorders and their children who meet the criteria for services.
January 2019	East Texas Behavioral Health Network – An Inter-Local Cooperative of Mental Health and Intellectual Developmental Disabilities Authorities	24 hours Behavioral Health Adult Crisis Telemedicine Services
January 2015	MetroCare Services	Operates a Licensed Retail Pharmacy for CHCS consumers at a CHCS facility.

Provider Availability

NOTE: The LPND process is specific to provider organizations interested in providing full levels of care to the non-Medicaid population or specialty services. It is not necessary to assess the availability of individual practitioners. Procurement for the services of individual practitioners is governed by local needs and priorities.

G. Using bullet format, describe steps the LMHA/LBHA took to identify potential external providers for this planning cycle. Please be as specific as possible. For example, if you posted information on your website, how were providers notified that the information was available? Other strategies that might be considered include reaching out to YES waiver providers, HCBS providers, and past/interested providers via phone and email; contacting your existing network, MCOs, and behavioral health organizations in the local service area via phone and email; emailing and sending letters to local psychiatrists and professional associations; meeting with stakeholders, circulating information at networking events, seeking input from your PNAC about local providers.

◆ Reviewed HHSC website for Provider inquiries
◆ Advertised / posted applications on CHCS website
◆ Advertised in local news media
◆ Conducted independent internet searches
◆ Contacted previous / current CHCS Providers regarding expanding services
◆ Studied previous local plans to determine if there were potential Providers to revisit

H. Complete the following table, inserting additional rows as needed.

- ◆ List each potential provider identified during the process described in Item 7 of this section. Include all current contractors, provider organizations that registered on the HHSC website, and provider organizations that have submitted written inquiries since submission of 2018LPND plan. You will receive notification from HHSC if a provider expresses interest in contracting with you via the HHSC website. Provider inquiry forms will be accepted through the HHSC website through February 28, 2020. **Note:** Do not finalize your provider availability assessment or post the LPND plan for public comment before March 1, 2020.
- ◆ Note the source used to identify the provider (e.g., current contract, HHSC website, LMHA/LBHA website, e-mail, written inquiry).
- ◆ Summarize the content of the follow-up contact described in Appendix A. If the provider did not respond to your invitation within 14 days, document your actions and the provider’s response. In the final column, note the conclusion regarding the provider’s availability. For those deemed to be potential providers, include the type of services the provider can provide and the provider’s service capacity.
- ◆

Provider	Source of Identification	Summary of Follow-up Meeting or Teleconference	Assessment of Provider Availability, Services, and Capacity
Upward Transitions Therapeutic Horsemanship – Equine Therapy	Email	11/19/2018 – Emailed CHCS YES Wavier Application; Provider was going to review and present option of becoming a Contractor to their Board. 10/10/2019 – Sent inquiry e-mail; No response.	Undetermined
Phyliss Thomas – Community Living Supports & Family	Email	2/7/2019 – Emailed CHCS YES Wavier Application. 8/2/2019 – Provider reached out to express	Undetermined

Supports		continued interest in YES Waiver program; Explanation of services provided; YES Waiver Application and HHSC YES Waiver Policy & Procedure Manual emailed.	
Complete Therapies, LLC – Music Therapy		7/20/2019 – Emailed CHCS YES Wavier Application. 7/25/2019 – Provided application technical assistance.	Undetermined
HopeWise – Art Therapy	Accessed the Art Therapy Credentials Board (ATCB) website	8/26/2019 – Emailed ATCB website requesting list of local Art Therapists to contact to schedule information sessions regarding the YES Waiver program and potential of becoming a Contractor. 9/5/2019 – Information session scheduled at LMHA location and follow up email sent with YES Waiver Application and HHSC YES Waiver Policy & Procedure Manual; Provider expressed interest and had additional questions that required further research.	Undetermined
Artvango – Art Therapy	Phone	8/26/2019 – Phoned with a request for Art Therapy services and offered YES Waiver information; Meeting was scheduled to discuss in further detail. 9/3/2019 – Information session held at Provider location with opportunity to ask additional questions; Provider expressed interest but had additional questions regarding credentialing that required further research with HHSC. 9/4/2019 – Emailed YES Waiver Application and YES Waiver Policy & Procedure Manual for further information.	Undetermined
OPEN T.R.A.I.L. Ranch – Animal Assisted Therapy	Accessed list of local PATH & EAGALA	10/10/2019 – Emailed website with YES Waiver information and requested list of credentialed Providers; Provided CHCS YES Waiver program	Undetermined

	licensed Providers via credentialing website	contact information to schedule appointment to discuss in further detail; No response.	
Oasis Acres Equine Assisted Therapy Center – Animal Assisted Therapy	Accessed list of local PATH & EAGALA licensed families via credentialing website	10/10/2019 – Emailed website with YES Waiver information and requested list of credentialed Providers; Provided CHCS YES Waiver program contact information to schedule appointment to discuss in further detail. 10/15/2019 – Received phone call requesting to schedule appointment for additional information; Appointment scheduled for 10/22/2019. 10/22/2019 – Information meeting conducted; Follow up email sent with YES Waiver Application; Pending submission.	Undetermined
Pleasant Grove Equestrian Center – Animal Assisted Therapy	Accessed list of local PATH & EAGALA licensed families via credentialing website	10/10/2019 – Emailed website with YES Waiver information and requested list of credentialed Providers; Provided CHCS YES Waiver program contact information to schedule appointment to discuss in further detail; No response.	Undetermined
Jami Netter – Recreation Therapy	Provider phoned YES Waiver Inquiry List phone line	10/1/2019 – Provider left voicemail on the CHCS YES Waiver Inquiry List telephone line regarding interest in contracting Recreational Therapy services. 10/10/2019 – Information meeting conducted; Follow up email sent with YES Waiver Application. 10/31/2019 – CHCS YES Waiver Application received. 12/10/2019 – Application reviewed and returned to	Application states Provider plans to contract Recreation Therapy from Tuesday to Saturday; Will serve up to 12 individuals at any given time / up to 42 individuals per fiscal year.

		Provider for additional questions and clarification.	
Kristin Ramirez – Art Therapy & Community Living Supports	Received referral and YES Waiver Information from previous CHCS YES Waiver Contractor	<p>10/23/2019 – Provider emailed CHCS YES Waiver program stating she was referred by a previous Art Therapy Provider with the CHCS YES Waiver program.</p> <p>10/24/2019 – Phoned Provider and discovered additional clarification is needed, regarding her credentials, to determine if she is eligible to provide services.</p> <p>10/31/2019 – Received clarification and confirmation that provider is not eligible for Art Therapy credentialing.</p> <p>11/21/2019 – Provider expressed interest in providing Community Living Supports (CLS) services and on 11/27/2019 scheduled information meeting.</p> <p>12/5/2019 – Information meeting held and Provider expressed interest in subcontracting under a current contract as opposed to contracting as a sole proprietor.</p> <p>12/12/2019 – Contact information provided to current contract providers to contact Ms. Ramirez about subcontracting opportunities, if interested.</p>	Undetermined

Part II: Required for LMHA/LBHAs with potential for network development

Procurement Plans

If the assessment of provider availability indicates potential for network development, the LMHA/LBHA must initiate procurement. 25 TAC §412.754 describes the conditions under which an LMHA/LBHA may continue to provide services when there are available and appropriate external providers. Include plans to procure complete levels of care or specialty services from provider organizations. Do not include procurement for individual practitioners to provide discrete services.

- I. Complete the following table, inserting additional rows as need.
 - ◆ Identify the service(s) to be procured. Make a separate entry for each service or combination of services that will be procured as a separate contracting unit. Specify Adult or Child if applicable.
 - ◆ State the capacity to be procured, and the percent of total capacity for that service.
 - ◆ Identify the geographic area for which the service will be procured: all counties or name selected counties.
 - ◆ State the method of procurement—open enrollment (RFA) or request for proposal.
 - ◆ Document the planned begin and end dates for the procurement, and the planned contract start date.

Service or Combination of Services to be Procured	Capacity to be Procured	Method (RFA or RFP)	Geographic Area(s) in Which Service(s) will be Procured	Posting Start Date	Posting End Date	Contract Start Date
Child & Adolescent Psychiatric Inpatient Services	100%	RFA	Bexar County	7/19/2018	Ongoing	Ongoing
Adult Psychiatric Inpatient Services	100%	RFA	Bexar County	10/4/2019	Ongoing	Ongoing
Youth Empowerment Services (YES) Waiver Provider Services	100%	RFA	Bexar County	7/25/2018	Ongoing	Ongoing

Rationale for Limitations

NOTE: Network development includes the addition of new provider organizations, services, or capacity to an LMHA/LBHA's external provider network.

J. Complete the following table. Please review 25 TAC §412.755 carefully to be sure the rationale addresses the requirements specified in the rule (See Appendix B).

- ◆ *Based on the LMHA/LBHA's assessment of provider availability, respond to each of the following questions.*
- ◆ *If the response to any question is Yes, provide a clear rationale for the restriction based on one of the conditions described in 25 TAC §412.755.*
- ◆ *If the restriction applies to multiple procurements, the rationale must address each of the restricted procurements or state that it is applicable to all of the restricted procurements.*
- ◆ *The rationale must provide a basis for the proposed level of restriction, including the volume of services to be provided by the LMHA/LBHA.*

	Yes	No	Rationale
1) Are there any services with potential for network development that are not scheduled for procurement?		X	
2) Are any limitations being placed on percentage of total capacity or volume of services external providers will be able to provide for any service?		X	
3) Are any of the procurements limited to certain counties within the local service area?		X	
4) Is there a limitation on the number of providers that will be accepted for any of the procurements?		X	

K. If the LMHA/LBHA will not be procuring all available capacity offered by external contractors for one or more services, identify the planned transition period and the year in which the LMHA/LBHA anticipates procuring the full external provider capacity currently available (not to exceed the LMHA/LBHA's capacity).

Service	Transition Period	Year of Full Procurement
N/A	N/A	N/A

Capacity Development

L. In the table below, document your procurement activity since the submission of your 2018 LPND Plan. Include procurements implemented as part of the LPND plan and any other procurements for complete levels of care and specialty services that have been conducted.

- ◆ List each service separately, including the percent of capacity offered and the geographic area in which the service was procured.
- ◆ State the results, including the number of providers obtained and the percent of service capacity contracted as a result of the procurement. If no providers were obtained as a result of procurement efforts, state "none."

Year	Procurement (Service, Percent of Capacity, Geographic Area)	Results (Providers and Capacity)
2018	Child & Adolescent Psychiatric Inpatient Services – 100% Capacity – Bexar County	Clarity Child Guidance Center – 100% Capacity
2018	Adult Psychiatric Inpatient Services – 100% Capacity – Bexar County	Nix Hospitals System; Southwest General Hospital
2018	Youth Empowerment Services (YES) Waiver Provider Services – 100% Capacity – Bexar County	Beyond Limits; Imagine Therapies – 100% Capacity; Counseling Link, LLC
2019	Child & Adolescent Psychiatric Inpatient Services – 100% Capacity – Bexar County	Nix Hospitals System; San Antonio Behavioral Health – 100% Capacity

PART III: Required for all LMHA/LBHAs

PNAC Involvement

M. Show the involvement of the Planning and Network Advisory Committee (PNAC) in the table below. PNAC activities should include input into the development of the plan and review of the draft plan. Briefly document the activity and the committee's recommendations.

Date	PNAC Activity and Recommendations
January 15, 2020	Draft Plan presented and changes from 2018 Plan were discussed.
March 17, 2020	March In-Person Meeting Cancelled Due to COVID-19 – Local Plan was on agenda for presentation. In lieu of in-person meeting, staff provided update on how to view local plan drafts on Center website and how to provide written comment by email.

Stakeholder Comments on Draft Plan and LMHA/LBHA Response

Allow at least 30 days for public comment on draft plan. Do not post plans for public comment before March 1, 2020.

In the following table, summarize the public comments received on the draft plan. If no comments were received, state “None.” Use a separate line for each major point identified during the public comment period, and identify the stakeholder group(s) offering the comment. Describe the LMHA/LBHA’s response, which might include:

- ◆ Accepting the comment in full and making corresponding modifications to the plan;
- ◆ Accepting the comment in part and making corresponding modifications to the plan; or
- ◆ Rejecting the comment. Please explain the LMHA/LBHA’s rationale for rejecting the comment.

Comment	Stakeholder Group(s)	LMHA/LBHA Response and Rationale
No comments received to date.		

COMPLETE AND SUBMIT ENTIRE PLAN TO Performance.Contracts@hhsc.state.tx.us by April 30, 2020.

Appendix A

Assessing Provider Availability

Provider organizations can indicate interest in contracting with an LMHA/LBHA through the [LPND website](#) or by contacting the LMHA/LBHA directly. On the LPND website, a provider organization can submit a Provider Inquiry Form that includes key information about the provider. HHSC will notify both the provider and the LMHA/LBHA when the Provider Inquiry Form is posted.

During its assessment of provider availability, it is the responsibility of the LMHA/LBHA to contact potential providers to schedule a time for further discussion. This discussion provides both the LMHA/LBHA and the provider an opportunity to share information so that both parties can make a more informed decision about potential procurements.

The LMHA/LBHA must work with the provider to find a mutually convenient time. If the provider does not respond to the invitation or is not able to accommodate a teleconference or a site visit within 14 days of the LMHA/LBHA's initial contact, the LMHA/LBHA may conclude that the provider is not interested in contracting with the LMHA/LBHA.

If the LMHA/LBHA does not contact the provider, the LMHA/LBHA must assume the provider is interested in contracting with the LMHA/LBHA.

An LMHA/LBHA may not eliminate the provider from consideration during the planning process without evidence that the provider is no longer interested or is clearly not qualified or capable of provider services in accordance with applicable state and local laws and regulations.

Appendix B

25 TAC §412.755. Conditions Permitting LMHA Service Delivery.

An LMHA may only provide services if one or more of the following conditions is present.

- (1) The LMHA determines that interested, qualified providers are not available to provide services in the LMHA's service area or that no providers meet procurement specifications.
- (2) The network of external providers does not provide the minimum level of individual choice. A minimal level of individual choice is present if individuals and their legally authorized representatives can choose from two or more qualified providers.
- (3) The network of external providers does not provide individuals with access to services that is equal to or better than the level of access in the local network, including services provided by the LMHA, as of a date determined by the department. An LMHA relying on this condition must submit the information necessary for the department to verify the level of access.
- (4) The combined volume of services delivered by external providers is not sufficient to meet 100 percent of the LMHA's service capacity for each level of care identified in the LMHA's plan.
- (5) Existing agreements restrict the LMHA's ability to contract with external providers for specific services during the two-year period covered by the LMHA's plan. If the LMHA relies on this condition, the department shall require the LMHA to submit copies of relevant agreements.
- (6) The LMHA documents that it is necessary for the LMHA to provide specified services during the two-year period covered by the LMHA's plan to preserve critical infrastructure needed to ensure continuous provision of services. An LMHA relying on this condition must:
 - (A) document that it has evaluated a range of other measures to ensure continuous delivery of services, including but not limited to those identified by the LANAC and the department at the beginning of each planning cycle;
 - (B) document implementation of appropriate other measures;

(C) identify a timeframe for transitioning to an external provider network, during which the LMHA shall procure an increasing proportion of the service capacity from external provider in successive procurement cycles; and

(D) give up its role as a service provider at the end of the transition period if the network has multiple external providers and the LMHA determines that external providers are willing and able to provide sufficient added service volume within a reasonable period of time to compensate for service volume lost should any one of the external provider contracts be terminated.

Appendix C

House Bill 1, 85th Legislature, Regular Session, 2017 (Article II, Health and Human Services Commission Rider 147):

Efficiencies at Local Mental Health Authorities and Intellectual Disability Authorities. The Health and Human Services Commission shall ensure that the local mental health authorities and local intellectual disability authorities that receive allocations from the funds appropriated above to the Health and Human Services Commission shall maximize the dollars available to provide services by minimizing overhead and administrative costs and achieving purchasing efficiencies. Among the strategies that should be considered in achieving this objective are consolidations among local authorities and partnering among local authorities on administrative, purchasing, or service delivery functions where such partnering may eliminate redundancies or promote economies of scale. The Legislature also intends that each state agency which enters into a contract with or makes a grant to local authorities does so in a manner that promotes the maximization of third party billing opportunities, including to Medicare and Medicaid. Funds appropriated above to the Health and Human Services Commission in Strategies I.2.1, Long-Term Care Intake and Access, and F.1.3, Non-Medicaid IDD Community Services, may not be used to supplement the rate-based payments incurred by local intellectual disability authorities to provide waiver or ICF/IID services. (Former Special Provisions Sec. 34)