

**Promoting wellness and recovery**

John R. Kasich, Governor • Tracy J. Plouck, Director • 30 E. Broad St. • Columbus, OH 43215 • (614) 466-2596 • mha.ohio.gov

To: Mark Hamlin, Director of Regulatory Policy
Lieutenant Governor Mary Taylor's Office

From: Janel M. Pequignot, Chief, Licensure and Certification

Date: 15 July 2013

Subject: CSI Review - Health Home Service for Persons with Serious and Persistent Mental Illness (OAC 5122-29-33)

Thank you for reviewing the above referenced proposed amended rule. The Ohio Department of Mental Health and Addiction Services (OhioMHAS) has reviewed the Common Sense Initiative review in which your staff recommended no changes. However, please note that OhioMHAS did revise the proposed language in paragraph (E)(3) in response to a comment receive through the Common Sense Initiative Office in order to improve clarity. In addition, in response to a request from a provider received outside the CSI process, OhioMHAS intends to add another option for providers to meet the requirements of integrated behavioral health/primary care by including Joint Commission primary care medical home certification in paragraph (F)(1)(b). The intent of this change is to expand the options for providers to meet the requirements of paragraph (F), and does not add any new requirement to the rule itself. The rule also now reflects the July 1, 2013 merger of the Departments of Mental Health with the Department of and Alcohol and Drug Addiction Services into a single state agency.

OhioMHAS will file the revised rule with these changes as well as other revisions previously reviewed by your office.

Please also note that, at the time of the CSI rule filing, ODMH [now OhioMHAS] noted in the answer to Question 14b on the Business Impact Analysis (BIA) that there was a rule pending JCARR to remove the accreditation requirement for four mental health services that an agency must provide in order to obtain ODMH certification for health home service. This change to OAC rule 5122-25-02 did go into effect on July 1, 2013. OhioMHAS amended the answers to Questions 14b and 14c to reflect this change, and to identify the fee options if undergoing a state certification process. This change had no impact on the health home rule requirements and does not require a provider to incur additional costs beyond those identified on the original BIA, but, upon previous advice of the CSI office, OhioMHAS revised the BIA to be current at the time of JCARR rule filing.