

**DEPARTMENT OF HEALTH AND HUMAN SERVICES**  
**OFFICE OF DIRECTOR**

**ACTION REFERRAL**

TO  <i>Myers</i>	DATE  <i>9-15-09</i>
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DIRECTOR'S USE ONLY	ACTION REQUESTED
1. LOG NUMBER  <div style="text-align: center; font-size: 1.2em;"><i>000131</i></div>	<input type="checkbox"/> Prepare reply for the Director's signature DATE DUE _____
2. DATE SIGNED BY DIRECTOR  <div style="text-align: center;"> <i>cc: Ms. Forkey, Wells</i>  <i>Cleaved 9/28/09, letter</i>  <i>attached.</i> </div> <div style="text-align: center; font-size: 2em; color: green; opacity: 0.5;">✓</div>	<input checked="" type="checkbox"/> Prepare reply for appropriate signature DATE DUE <i>9-24-09</i> <input type="checkbox"/> FOIA DATE DUE <i>✓</i> _____ <input type="checkbox"/> Necessary Action

APPROVALS <small>(Only when prepared for director's signature)</small>	APPROVE	* DISAPPROVE <small>(Note reason for disapproval and return to preparer.)</small>	COMMENT
1.			
2.			
3.			
4.			



## Horry County Schools

September 11, 2009

**RECEIVED**

SEP 15 2009

Department of Health & Human Services  
OFFICE OF THE DIRECTOR

Ms. Emma Forkner, Director  
Department of Health and Human Services  
PO Box 8206  
Columbia, SC 29202-8206

RE: Creative Strategies for Working with Youth with Serious Emotional and Behavioral  
Issues Impacted by the State Medicaid Plan Amendment (SPA)

Dear Ms. Forkner:

Over the past several months I have been apprised that the Department of Health and Human Services (DHHS) is in the process of working with the Centers for Medicare and Medicaid Services (CMS) to revise the State Medicaid Plan for Behavioral Health Services. I can only imagine the magnitude of this project at your level and certainly respect the diligence of you and your staff to bring closure to this task.

Horry County Schools, as a Local Education Agency, has utilized Wraparound ("Wraps") Services to meet the needs of children with special emotional/behavioral needs in school-centered services that stabilize and strengthen the child reducing out-of-school placement and potentially movement to a more intensive and costly setting or service. The District has taken a very proactive approach in developing programs that complement a growing continuum of community-based mental health services.

The District supports two elements of school based mental health services through our own Wraps Clinical Services Department and School-based Mental Health counselors from our Local Mental Health Agency. Hundreds of children are being served each year by individuals who work within these organizations to address the broad array of needs of children with serious emotional and behavioral challenges.

Two years ago we entered into an agreement with Seacoast Youth Academy, a private provider for the purpose of providing rehabilitative psychosocial services for Horry County students who exhausted traditional school programs and behavioral interventions that were about to be suspended or expelled from their respective schools. The Seacoast Program provided a clinical and academic component at an off-site location. Feedback from parents regarding the program was favorable. However, the program will no longer provide these services to the District. In fact, this same program has increased its residential capacity to 31 youth who can come from all geographic locations of the state. With the loss of the Psychosocial Rehabilitative Service (PRS) program, these children along with children we had previously placed in the Day Treatment Component, will have to be assimilated into

Ms. Emma Forkner

-2-

September 11, 2009

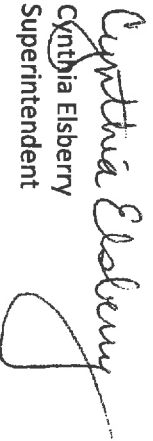
nearby schools. Obviously, these children need a higher level of support and interventions intended to match the successes of past placements.

District staff has met several times to discuss strategies to accommodate the needs of these children. These discussions have included options such as developing a school-run PRS or expanding Wraps Services to schools receiving these children. I was made aware that DHHS has taken a position that posits not accepting any changes to their programs; i.e., moving locations, starting new programs, increasing/decreasing numbers, etc. It now becomes apparent that the State Plan Amendment (SPA) will be a protracted process limiting child centered services to students.

I am respectfully requesting that you allow the District an exemption on the SPA behavioral health services moratorium so that there is flexibility in the transfer of existing Wraps staff to other school locations within Horry County Schools and where an urgent need exists due to an influx of children formally served with the PRS Model.

Your consideration would greatly be appreciated and would be in the best interest of the students. Please feel free to contact Carolyn Chestnut at (843) 488-6768 or me, if you have any questions.

Sincerely,

  
Cynthia Elsberry  
Superintendent

cc: Carolyn Chestnut, Chief Instructional Support Services Officer

September 28, 2009

Ms. Cynthia Elsberry, Superintendent  
Horry County Schools  
Post Office Box 260005  
Conway, South Carolina 29528-6005

Dear Superintendent Elsberry:

This letter is in response to your correspondence, dated September 11, 2009, regarding creative strategies for working with youth with serious emotional and behavioral problems impacted by the State Plan Amendment (SPA). The Division of Family Services' staff has worked closely with the program staff in the district concerning Community-Based Wraparound Services and Psychosocial Rehabilitation Services (PRS) over the last several years. We would like to take this opportunity to thank the Horry County School District for their participation in the South Carolina Medicaid Program and for assisting us with the implementation of behavioral health programs.

As you know, the Department of Health and Human Services (DHHS) is amending the State Medicaid Plan to articulate behavioral health service descriptions, provider qualifications and reimbursement methodologies in accordance with the guidance from The Centers for Medicare and Medicaid Services (CMS), to replace existing general State Plan language related to behavioral health. The SPA will assist the state in avoiding a disallowance for behavioral health services that are currently provided, yet not stated in discrete terms in the State Plan. CMS also provided guidance related to services currently receiving a comprehensive daily rate or per diem reimbursement. Since these and other programs with daily reimbursement rates will be unbundled and cross walked to discreet services as a result of the SPA, DHHS has implemented a moratorium on adding or expanding these services for the time being.

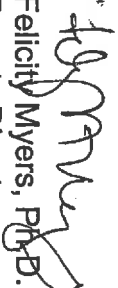
Presently, DHHS staff is working diligently to finalize the fee schedule and methodology used to develop the reimbursement rates in the SPA. Once this final section of the amendment is completed, the SPA will be submitted to CMS for approval. We are anticipating a period of transition to allow providers time to make the necessary changes for service delivery.

DHHS has reviewed your request to allow the District flexibility in the transfer of existing personnel working with the Community-Based Wraparound program to other school locations within Horry County Schools. We believe the circumstances referenced in your letter warrant the need to grant your request. Please be reminded that all services must be rendered in compliance with the Medicaid Standard for Community-Based Wraparound Services.

Ms. Cynthia Elsberry, Superintendent  
September 28, 2009  
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We hope to have additional information to share with State agencies regarding the SPA soon. We wish you continued success with the Wraparound program in the Horry County Schools. Should have any questions in the meantime, please contact Mr. Sam Waldrep at 803-898-2693.

Sincerely,

  
Felicity Myers, Ph.D.  
Deputy Director

FCM/wcj