

Better Health for Northeast NY, PPS DSRIP Year 3, Quarter 2 APPEAL

The Better Health for Northeast NY (BHNNY) PPS submitted an appeal requesting that the Independent Assessor (IA) reconsider its determination for Project 3.a.i, Milestone 5.

Independent Assessor's Initial Determination

Required Documentation

Project 3.a.i, Milestone 5 required the PPS to submit documentation to support that primary care services are co-located within behavioral Health practices and are available. Of the data requirements, the PPS submitted a list of practitioners and licensure performing services at behavioral health sites, of which the IA requested a random sample of 8 practitioners. The PPS responded to the request and the IA determined that the PPS did not submit documentation for each item within the request. As a result, the PPS failed to meet the milestone requirements.

Initial IA Determination:

Project 3.a.i, Milestone 5- Fail

Rationale for Initial IA Determination

Project 3.a.i, Milestone 5

The IA did not consider this milestone complete. Of the data requirements, the PPS submitted a list of practitioners and licensure performing services at behavioral health sites, of which the IA requested a random sample of 8 practitioners. The PPS responded to the request by submitting 4 medical providers and staff. The IA determined that the PPS did not submit documentation for each of the 8 items sampled. As a result, the PPS failed to meet the milestone requirements.

BHNNY PPS Appeal

BHNNY PPS subsequently filed a formal appeal to the IA's initial determination.

"Milestone 5, as a provider level milestone, required the PPS submit all practitioners engaged in Model 2 of the Integration of Primary Care and Behavioral Health project, including both behavioral health and primary care providers. However, as per the documentation requirements outlined in the DSRIP Reporting and Validation Protocols: Domain 1 Milestones document, we are required to provide a comprehensive list of PCMH and/or APCM practitioners and their licensure performing services at behavioral health sites as a data source to complete the metric requirements. As milestone 5 specifically focuses on co-locating primary care services at behavioral health sites, during the validation process we provided the schedules for the four medical providers and staff at Northern Rivers Family of Services: Lisa Bevilaqua, DO, Kevin Pachucki, PA, and Virginia Khoury, MD, and the supporting nursing staff who

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assists with medical coverage. Ernesto Roldan, MD was listed as he assists with 24 hour on-call responsibilities.”

Independent Assessor’s Final Determination

Final IA Determination after Appeal

Upon further review and validation by the IA, the BHNNY PPS will be receiving an overturned status of **Pass and Complete** for Project 3.a.i, Milestone 5.

Rationale for Final IA Determination

The IA accepts the PPS’ clarification that it submitted a comprehensive list of all providers engaged in Project 3.a.i Model 2. The PPS did not submit a shorter list of the practitioners engaged specifically in Milestone 5 and, as a result, the IA pulled a sample from the list reflecting all providers engaged in the Project and Model. The PPS should heed future reporting to ensure the submission at the Project Requirement (milestone) level is specific to the requirements of that milestone, metric, and data source so that the sample requested considers an accurate universe. In the interest of this specific milestone and the clarification provided, the IA finds the original determination of this milestone overturned.