

2022 Local Planning & Network Development Plan

Complete and submit in **Word** format (**not PDF**) to Performance.Contracts@hhs.texas.gov no later than December 31, 2022.

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 Planning and Network Advisory Committee (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 2020 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

1) Provide the following information about your local service area. Most of the data for this section can be accessed from the following reports in Mental and Behavioral Health Outpatient Warehouse (MBOW), using data from the following report: The most recent MBOW data set regarding LMHA/LBHA Area and Population Stats (in the General Warehouse folder).

Population	865,657	Number of counties (total)	1
Square miles	1,013	♦ Number of urban counties	1
Population density	855	♦ Number of rural counties	

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
El Paso	El Paso	678,815	865,657	855	100%

Current Services and Contracts

- 2) Complete the table below to provide an overview of current services and contracts. Insert additional rows as needed within each section.
- 3) List the service capacity based on the most recent MBOW data set.
- a) 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 (Level of Care)-A by Center (Non-Medicaid Only and All Clients).
 - b) For residential programs, list the total number of beds and total discharges (all clients).
 - c) For other services, identify the unit of service (all clients).
 - d) Estimate the FY 2022 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 2021. In the sections for Complete Levels of Care, do not include contracts for discrete services within those levels of care when calculating percentages.

Adult Services: Complete Levels of Care	Most recent service capacity (non-Medicaid only)	Estimated FY 2022 service capacity (non-Medicaid only)	Percent total non-Medicaid capacity provided by external providers in FY 2021*
Adult LOC 1m	0	0	0
Adult LOC 1s	2,239	2,163	0
Adult LOC 2	703	641	0
Adult LOC 3	387	396	0

Adult LOC 4	31	29	0
Adult LOC 5	96	74	0

Child and Youth Services: Complete Levels of Care	Most recent service capacity (non-Medicaid only)	Estimated FY 2022 service capacity (non- Medicaid only)	Percent total non- Medicaid capacity provided by external providers in FY 2021*
Children's LOC 1	19	23	0
Children's LOC 2	82	86	0
Children's LOC 3	30	39	0
Children's LOC 4	2	2	0
Children's LOCYC	1	0	0
Children's LOC 5	0	3	0

Crisis Services	FY 2021 service capacity	Estimated FY 2022 service capacity	Percent total capacity provided by external providers in FY 2021*
Crisis Hotline	29,685	30,240	0
Mobile Crisis Outreach Team	1,875	1,793	0
Other - Please list all Psychiatric Emergency Service Center (PESC) Projects and other Crisis Services	141 Admissions	137 Admissions	100

PESC hospital services	435 Admissions	406 Admissions	100
Private Psychiatric Bed (PPB) hospital services	274 Admissions	361 Admissions	100
Respite	N/A	N/A	N/A

- 4) List **all** your FY 2021 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)
Amendment 1 to UMC Interlocal (BHC Contract)	
Amerigroup Agreement	
AOT MOU and 16.22 Interlocal Agreement	

Capella University Affiliation Agreement	
Conga Contracts	
ECivis Agreement	
EHN HACEP MOU Siesta Gardens (The Refuge)	
EHN UMC Jail Subcontract	
El Paso Disposal	
EPBHS PESC	
EPBHS RCSU/PPB Agreement	
HHSC Contract Affirmation Casa Bagdad	
Janice T. Chaplin Consulting Agreement	Consultant
JPD MST MOU	
Keiser University Affiliation Agreement	
Marriage Management Consultants	Consultant
MCCI Amendment	

Mediwaste Rx Destroyers Service Agreement	
Merz Aesthetics	
Molina Services Agreement	
MOU CIT City of Socorro	
National Council for Mental Wellbeing Agreement	
Nurse Consultant Agreement	
Paso del Norte Health Foundation MHLL Grant	
RSVP Catering Extension	
Securance	
TRPN Agreement	
TX System of Care Grant	
TXMOUD FY22 OBOT Agreement	
United Way FRC 2021-2022 contract	
University of Colorado School of Medicine Kempe Center MST	

Veteran's One Stop-Western Governor University MOU	
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Individual Practitioners	Service(s)
Affordable El Paso Family Dental, PLLC	Dental Care
Butler Behavioral	Jail Psychiatric Services
Deegear Pamela W	Consultant
Dominguez Martha	Therapy Services
Dr. Javier Carrillo	IDD Psychological Evaluations
Dr. Sergio Rodarte	Physician Psychiatric Services
Enjoy Your Life Recreation Therapy LLC.	Therapy Services
Espinosa Ivonne	Consultant
Evans Three Bears Consulting	Consultant
Gonzalez Irma	Therapy Services
Hanger Inc-Station	Consultant
Harre Jr John C	Therapy Services
Hernandez Mara M.A. LPC	Consultant
Herrera Sylvia LPC	Consultant

Marcel Samuel LPC	Therapy Services
Marquez Ricardo	Dental Care
Martinez Anastacia	Consultant
Medrano Karmy	Dietitian Services
Molina Carmen	Therapy Services
Paez Rios Maria A	Therapy Services
Polk Andrew J	Consultant
Posthuma Richard	Consultant
Rago William	Consultant
Robles Elizabeth	Therapy Services
Rosales Laura M	Dietitian Services
Valeo Rehab PLLC	Therapy Services
Vipond Leigh	Consultant

Administrative Efficiencies

5) *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).*

◆ Information Technology has achieved cost savings by entering into new agreements for equipment rentals and Microsoft office suite.
◆ Fleet management introduced a fuel card program to save on fuel costs.
◆ Purchased new ERP system to assist in accounting and procurement processes.
◆ EHN is implementing the Cobblestone Contract Management System to reduce overhead and improve efficiencies in managing contracts and legal agreements.
◆ EHN continues to work on streamlining its telecommunications system by renegotiating current agreements and establishing new vendor relationships.
◆ EHN has established a state-of-the-art consumer call center to more efficiently manage consumer and business partner calls and appropriately redirect clinical crisis calls to clinical personnel.
◆ EHN continues to evaluate physical plant requirements and reducing and/or renegotiating leases as appropriate.

6) *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
05/2016	<ul style="list-style-type: none"> • Tejas Behavioral Health Management Association • Integral Care • Bluebonnet Trails Community Services • The Center For Mental Health Services, formerly the Bexar County Board Of Trustees For Mental Health And Mental Retardation • Texas Council of Community Centers & Hill Country Mental Health & Developmental Disabilities Centers 	<ul style="list-style-type: none"> • Inter-local Agreements between several Texas LMHAs pursuant to Inter-local Cooperation Act, being Chapter 791 of the Texas Government Code to create efficiencies in the performance of administrative and business functions.
05/2016	<ul style="list-style-type: none"> • Texas All Access 	<ul style="list-style-type: none"> • EHN participates as an ex officio member in the State of Texas' All Access workgroups, which look to increase partnership and resource efficiency among rural centers.
05/2016	<ul style="list-style-type: none"> • Concho Valley • West Texas Center • Permian Care 	<ul style="list-style-type: none"> • Contracted with EHN for it's Local IDD Authority (LIDDA) status for Money Follows the Person Transition Support Services.

06/2020	<ul style="list-style-type: none"> Integral Care & Pecan Valley Centers 	<ul style="list-style-type: none"> EHN works with Integral Care & Pecan Valley Centers to ensure successful implementation of the State of Texas' SAMHSA Systems of Care grant for children's services.
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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.

7) 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, Home and Community Based Services (HCBS) providers, and past/interested providers via phone and email; contacting your existing network, Managed Care Organizations (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.

- ◆ EHN has published RFAs seeking providers for HCBS and YES Waiver. These RFAs have been published on our website as well as local newspaper ads. We have attempted to reach out to

providers via email and calls. We have also contracted existing providers for potential leads to additional providers.
♦ Reviewed the HHSC Provider Interest List.
♦ Sought recommendations from PNAC.
♦ Community Brain Trust Meeting.

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 2020 LPND 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 September 1, 2022. **Note:** Do not finalize your provider availability assessment or post the LPND plan for public comment before June 1, 2022.*
- ♦ *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
El Paso Mental Health	In person with Provider	In person meetings describing the notification process for contractual opportunities with EHN.	Adult provider with minimal capacity to conduct multiple levels of care. Conflict of interest concerns involving physician oversight requirements.

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.

Texas Administrative Code (TAC) Title 26, Part I, Chapter 301, subchapter F 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.

8) Complete the following table, inserting additional rows as needed.

- ◆ 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 Request for Application (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
RFA YES Waiver: Specialized Therapies	100%	RFA	El Paso County	October 20, 2020	Continuous	Open to providers

Rationale for Limitations

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

9) Complete the following table. Please review TAC Title 26, Part I §301, subchapter F 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 TAC Title 26, Part I §301, subchapter F.
- ◆ 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
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1) Are there any services with potential for network development that are not scheduled for procurement?		X	EHN has existing infrastructure to meet HHSC's service array, (including substance use treatment). The exception being Psychiatric Emergency Service Centers. In situations where gaps in services exist, procurement contracts have, in the past, been sought; a practice that EHN will continue in perpetuity.
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	Presently, there are no local providers that can provide the full HHSC's service array. Wherever applicable, EHN contracts with external providers that can assist in meeting service delivery capacity.
3) Are any of the procurements limited to certain counties within the local service area?	X		All Services are exclusive to El Paso County.
4) Is there a limitation on the number of providers that will be accepted for any of the procurements?	X		Local community is challenged by providers that are not able to provide a full Level of Care array. This presents a challenge towards patient choice when local community capacity is lacking.

10) *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
Not applicable		

Capacity Development

11) *In the table below, document your procurement activity since the submission of your 2020 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	RFA 16-001: Behavioral Health Telemedicine Services	Contract with Genoa, JSA and IRIS for services. RFA continuously open.
2018	RFP 18-005: Contracted Nursing Services	Contract with Annashae Corporation and Sunbelt Staffing.
2019	RFA 20-015: YES Waiver	Continuously open

2018	RFA 17-008: IDD Respite Services	Continuously open
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PART III: Required for all LMHA/LBHAs

PNAC Involvement

12) *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
7/13/2022	PNAC provided no feedback or recommendation.

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 June 1, 2022.

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
None	PNAC	
None	P&D	
None	Executive Committee	
	Board of Directors	

COMPLETE AND SUBMIT ENTIRE PLAN TO Performance.Contracts@hhs.texas.gov by December 30, 2022.

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

TAC Title 26, Part I §301, subchapter F. 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, 87th Legislature, Regular Session, 2021 (Article II, Health and Human Services Commission Rider (139)):

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.