

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	136,104	Number of counties (total)	7
Square miles	9,375	♦ Number of urban counties	1
Population density	93	♦ Number of rural counties	6

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 Angelo	Tom Green	99,667	120,105	79	88%

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	420	420	0%
Adult LOC 2	70	70	0%
Adult LOC 3	9	9	0%
Adult LOC 4	2	2	0%
Adult LOC 5	0	0	0%

Child and Youth Services: Complete Levels of Care	Most recent service capacity	Estimated FY 2022 service	Percent total non-Medicaid capacity
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	(non-Medicaid only)	capacity (non-Medicaid only)	provided by external providers in FY 2021*
Children's LOC 1	6	6	0%
Children's LOC 2	15	15	0%
Children's LOC 3	4	4	0%
Children's LOC 4	0	0	0%
Children's LOCYC	2	2	0%
Children's LOC 5	0	0	0%

Crisis Services	FY 2021 service capacity	Estimated FY 2022 service capacity	Percent total capacity provided by external providers in FY 2021*
Crisis Hotline	3,657	2,842	100%
Mobile Crisis Outreach Team	1,520	1,080	100%
Other - Please list all Psychiatric Emergency Service Center (PESC) Projects and other Crisis Services			
PESC hospital services	1416	1416	100%
Private Psychiatric Bed (PPB) hospital services	204	540	100%
Respite	12 beds/night	12 beds/night	0%
CSU	300	300	100%

Tom Green County ARPA	0	135	100%
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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)
Avail Solutions	24 Crisis Hotline
Concho Valley Counseling	Counseling Services
NewQuest IT Solutions	Information Technology Services
Rivercrest Hospital	Inpatient Psychiatrist Services
Shannon Behavioral Health Services	Inpatient Psychiatrist Services
Shannon Clinic	Primary Care Services
Sing Your Way Home	Music Therapy
Sonrisas Riding Trails	Equestrian Therapy
WTCG CBT Counseling	Counseling Services

WTCG Zero Suicide	Zero Suicide Initiative
Coke County MH Deputy Program	Funding for Mental Health Deputy
Crockett County	Funding for Mental Health Deputy
East Texas Behavioral Health Network	Telehealth Providers, Utilization Management Services
Sterling County MH Deputy Program	Funding for Mental Health Deputy
Tom Green County Juvenile Justice Program	Assessments
Reagan County MH Deputy Program	Funding for Mental Health Deputy
OCEANS Behavioral Health	Inpatient Psychiatric Services
FasPsych	Telehealth Providers

Individual Practitioners	Service(s)
Zaruba Lynn BCBA	Behavior Therapy Assessments

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).*

♦ Continually seek best rates for utility costs.
♦ Monitor telecommunications expenses for unused lines/extensions.
♦ Install and monitor thermostats to conserve energy cost.

♦ Utilize policy for competitive bidding process.
♦ Replace inefficient lighting/ballast with new more efficient alternatives.
♦ Professional Services Agreement with Enterprise Fleet Management.
♦ Patient Assistance Programs & sample medications. Free or discounted medications saves funding that can be utilized for patient services.

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
1980's	Texas Council Risk Management Fund	Joined with other Centers in the Texas Council Risk Management Fund to achieve best costs for insurance, legal consultation, and staff training & development.
2014	Western Behavioral Health Network	Medicaid Managed Care rate setting; insurance contracting.

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.

♦ HHSC website.
♦ Contracted current & former providers.
♦ Communications with providers and stakeholders via email, phone calls, face to face and community agency meetings.
♦ Information about activities and procurement posted on the Center's website.
♦ Issued an RFB for roof replacement.
♦ Issued an RFB for facility painting, minor remodel.
♦ Issued an RFB for facility flooring.

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
West Texas Counseling and Guidance	Current Provider	Phone calls, e-mails, meetings to discuss the continuation of the existing contract. Agreement to renew the existing contract for counseling services & Zero Suicide Initiative.	Provider has 23 Licensed Professional Counselors who are CBT trained and offer patient choice of counselor.

Shannon Behavioral Health	Current Provider	Phone calls and e-mails to discuss the continuation of the existing contract for psychiatric inpatient beds. Agreement to renew the existing contract.	Provider is able to provide 24-hour professional monitoring, supervision, and assistance to assure safety/security during acute psychiatric crisis.
River Crest Hospital	Current Provider	Phone calls and e-mails to discuss the continuation of the existing contract for psychiatric inpatient beds. Agreement to renew the existing contract.	Provider is able to provide 24-hour professional monitoring, supervision, and assistance to assure safety/security during acute psychiatric crisis.
East Texas Behavioral Health Network	Current Provider	Phone calls, e-mails, face-to-face meetings to discuss the contract opportunity for pharmacy, medical director, utilization review, tele-psychiatry services. Contract awarded.	Provider is a licensed pharmacy and is able to accommodate our patient population with various psychiatric and primary care medication needs. Provider also provides pharmacy, medical director, utilization review and tele-psychiatry services to other community centers.
AVAIL Solutions, Inc.	Current Provider	E-mails and phone calls with the Director regarding continuing the contract providing Crisis Hotline services. Agreement to continue contract.	Provider is AAS certified and also provides Crisis Hotline services to other community centers.
Shannon Clinic	Current Provider	Phone calls and e-mails to discuss the continuation of the existing contract for primary care PA services, primary care lab and ancillary services. Agreement to renew the existing contracts.	Provider is able to deliver primary care prescribing provider, lab and ancillary services in the amount needed.
Shannon Hospital	Current Provider	Phone calls and e-mails to discuss the continuation of the existing contract for phlebotomy.	Provider is able to deliver phlebotomy services on-site at our clinic location at the designated times.

		Agreement to renew the existing contract.	
Language Line Solutions	Current Provider	E-mails and phone calls with provider to discuss feasibility of using services available for translation purposes. Agreement to work with Language Line Solutions.	Provider offers phone interpreter services in over 240+ languages available 24/7. Provider offers video interpreting services available for LEP and Deaf and Hard of Hearing; available 24/7.
Coke County	Current Provider	Phone calls, e-mails, face-to-face meetings to discuss the contract opportunity for Mental Health Deputy services. Agreement to enter into the contract.	Sheriff's Department is able to provide MH Deputy services to meet demand.
Concho County	Current Provider	Phone calls, e-mails, face-to-face meetings to discuss the contract opportunity for Mental Health Deputy services. Agreement to enter into the contract.	Sheriff's Department is able to provide MH Deputy services to meet demand.
Crockett County	Current Provider	Phone calls, e-mails, face-to-face meetings to discuss the contract opportunity for Mental Health Deputy services. Agreement to enter into the contract.	Sheriff's Department is able to provide MH Deputy services to meet demand.
Reagan County	Current Provider	Phone calls, e-mails, face-to-face meetings to discuss the contract opportunity for Mental Health Deputy services. Agreement to enter into the contract.	Sheriff's Department is able to provide MH Deputy services to meet demand.
Sterling County	Current Provider	Phone calls, e-mails, face-to-face meetings to discuss the contract opportunity for Mental Health	Sheriff's Department is able to provide MH Deputy services to meet demand.

		Deputy services. Agreement to enter into the contract.	
Tom Green County	Current Provider	Phone calls, e-mails, face-to-face meetings to discuss the contract opportunity for Mental Health Deputy services. Agreement to enter into the contract.	Sheriff's Department is able to provide MH Deputy services to meet demand.
FasPsych	Current Provider	Phone calls and e-mails to discuss the contract opportunity for tele-psychiatry services. Agreement to enter into the contract.	Provider is able to deliver telepsychiatry services in the amount needed.
Sonrisas Riding Trails	Current Provider	Phone calls and e-mails to discuss the contract opportunity for therapeutic riding services for YES Waiver. Agreement to enter into the contract.	Provider is able to deliver therapeutic riding services in the amount needed.
Sing Your Way Home	Current Provider	E-mails and phone calls with provider to discuss feasibility of using music therapy services for YES Waiver. Agreement to work with Sing Your Way Home.	Provider is able to provide music therapy services in the amount needed.
Hands Up Interpreting & Consulting	Current Provider	E-mails and phone calls with provider to discuss feasibility of using services available for translation purposes. Agreement to work with Hands Up Interpreting & Consulting.	Provider offers phone interpreter services in over 240+ languages available 24/7. Provider offers video interpreting services available for LEP and Deaf and Hard of Hearing; available 24/7.
Jelly Nonprofit Consulting	Current Provider	Phone calls, e-mails and face to face meetings to discuss grant writing opportunities/services.	Provider offers grant writing services.

Joel Carr, Ph.D.	Current Provider	Phone calls, e-mails and face to face meetings to discuss quality improvement services.	Provider offers quality improvement services.
NewQuest IT Solutions	Current Provider	Phone calls, e-mails and face to face meetings to discuss quality improvement services.	Provider offers Information Technology Services.

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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
N/A	N/A	N/A	N/A	N/A	N/A	N/A

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
1) Are there any services with potential for network	N/A	N/A	N/A

development that are not scheduled for procurement?			
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?	N/A	N/A	N/A
3) Are any of the procurements limited to certain counties within the local service area?	N/A	N/A	N/A
4) Is there a limitation on the number of providers that will be accepted for any of the procurements?	N/A	N/A	N/A

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
N/A	N/A	N/A

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)
N/A	N/A	N/A

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
09/23/2020	LPND Reviewed by PNAC.
09/24/2020	No comments received from community stakeholders on LPND document.
10/21/2020	Review of the outcome of the IDD Authority Review; outcome of the HCS/TXHML Review; Review of Center's Goals and Planning Update.
02/24/2021	Reviewed 8 provider contracts- committee reviewed the evaluation for each provider and recommendation to continue with providers; Zero Suicide Workforce Survey-no recommendations; FY2020 Q3-4 MCOT Chart Review; FY2021 PASRR CAP Review – no recommendations.
03/24/2021	Reviewed 10 provider contracts – committee reviewed the evaluation for each provider and recommendation to continue with providers; Quality Management Items; FY2021 Corrective Action Plan Compliance Desk Review; San Angelo Clubhouse Report.
07/21/2021	Reviewed 17 provider contracts – committee reviewed the evaluation for each provider and recommendation to continue with providers; Quality Management Items; Transition Planning for IDD Individuals – recommendation for outreach through video in social media; Community Needs Assessment and CCBHC Update – will be incorporated in the strategic and approved by the Board.
08/25/2021	Review the FY 2022 Operating Budget – no recommendations; Update of the HHSC LIDDA Financial Audit-no recommendations; HHSC Performance Contract Authority Review – no recommendations.
09/27/2021	Reviewed Quality Management Items – no recommendations.
01/026/2022	Reviewed 16 provider contracts – committee reviewed the evaluation for each provider and recommendation to continue with providers; Quality Management Items – no recommendations; Transition of Day Habilitation

	Services to Individualized Skills and Socialization – no recommendations; Zero Suicide Training; Update of the Crisis Respite Facility – no recommendations.
03/23/2022	Reviewed 14 provider contracts – committee reviewed the evaluation for each provider and recommendation to continue with providers; Quality Management Items – no recommendations.
08/30/2022	Reviewed the FY2023 Operating Budget – no recommendations; Reviewed 7 provider contracts – recommendation to continue contracts with providers; Quality Management Items – no recommendations.
10/26/2022	Quality Management Items – no recommendations; Review of the FY2022 Patient Satisfaction Surveys – Each program scored above the set percentage target – no recommendations.
12/01/22	LPND posted on Center website for comments.
12/21/22	LPND reviewed by PNAC.
12/30/22	

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

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

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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.