

Maryland Behavioral Health Coalition

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September 28, 2021

The Honorable Larry Hogan
Governor of Maryland
100 State Circle
Annapolis, MD 21401

Dear Governor Hogan,

In the midst of the greatest health care crisis in the United States in a century, which has been accompanied by rising mental illness and addiction, alarming suicide rates, and increased opioid deaths, the basic functionality of Maryland's Public Behavioral Health System (PBHS) remains broken due to the selection in 2019 of a faulty IT vendor. As we approach two years of basic claims payment system failure, we are again writing with a desperate plea to you to take direct action to fix this solvable problem. Attached are copies of our prior correspondence, dating back to April 2020.

After 21 months:

- Claims receipts and payments remain missing
- Insurance coverage and Medicaid eligibility functions do not work and continue to cause erroneous claims denials
- Contractual turn-around times for authorization approvals are missed, delaying services to consumers
- Guardrails preventing multiple authorizations by different providers for the same service do not exist, so services are routinely rendered by authorized providers and not paid
- Plans for the recoupment of unverified overpayments continue to move forward despite the lack of reliable data to reconcile historical payments and services
- Manual interventions to address claims processing failures are plagued by insufficient staffing, resulting in missed deadlines and vendor failure to meet contractual system performance standards
- Optum continues to not be held accountable for contract deliverables

In short, this is a mess. It is clear the Incedo system will never be properly functional and needs to be discarded. And it is likely that reconciliation of estimated payments and claims may not be fully possible due to the extreme dysfunction of the Incedo system.

Failing to act now only increases the likelihood of increased negative impact on the public and the providers who serve them in this time of great need.

This is not the first time an IT vendor has delivered a product with disastrous results, an issue we all are familiar with in today's world, and it won't be the last. Times are hard and we have no interest in casting blame anywhere. We appreciate the impact of COVID 19 on the Health

Department's operations and are well aware that the state government workforce has been impaired in its wake. We appreciate your leadership, Secretary Schrader's leadership and the entire MDH team's responsiveness with respect to COVID 19.

What is heartbreaking about this unfortunate situation is that Maryland's PBHS is among the highest rated in the nation and was poised to move forward with a system transformation effort to advance value-based purchasing using best practice measurement-based care tools, ensuring results-based accountability and incentives promoting the most effective care for those in need. Instead, modernizing the system has been shelved, while our community providers continue to act heroically to serve their clients, amidst increasingly precarious circumstances.

Of utmost importance to us is a commitment that Optum be held financially accountable in any reconciliation effort and that consumers and providers be held harmless as the state moves forward with these plans.

On behalf of the 122 undersigned organizations, we are requesting a meeting with you at your earliest convenience. We wish to share our concerns, discuss solutions and offer our partnership to eliminate this problem.

Thank you for your attention to this issue and request.

Sincerely,

Acadia Healthcare Maryland Clinics
Advantage Psychiatric Services
Archway Station
Arrow Child and Family Ministries
Arundel Lodge
Aspire Wellness Center
Awakenings Recovery Center
Baltimore City Substance Abuse Directorate
Baltimore Crisis Response, Inc. (BCRI)
Baltimore Harm Reduction Coalition (BHRC)
Baymark
Bayside Recovery
Behavioral Health System Baltimore (BHSB)
Board of Child Care
Born Free Wellness Centers of America
Brain Injury Association of Maryland (BIAMD)
Brantwood Family Services
Carroll County Youth Service Bureau
Catholic Charities
Center for Children
Change Health Systems

Channel Marker
Charles County Freedom Landing
Chesapeake Voyagers
Children's Guild
Community Behavioral Health Association of Maryland (CBH)
Community Connections
Community Residences
Cornerstone Montgomery
Corsica River Mental Health Services
Crossroads Community
Eastern Shore Behavioral Health Coalition (ESBHC)
EveryMind
Families First Counseling and Psychiatry
Family Services Foundation
For All Seasons
Foundations Recovery Center
Frederick Institute
Fresh Start Recovery Center
Garrett County Lighthouse
Go-Getters
Goodwill Industries of the Chesapeake (STEP)
Greater Washington Society for Clinical Social Work (GWSCSW)
Harford Belair Community Mental Health Center
Head Injury Rehabilitation and Referral Services (HIRRS)
Hope Health Systems
Humanim
Hudson Behavioral Health
Institutes for Behavioral Resources (IBR)
James' Place
Jewish Social Services Agency
Key Point Health Services
La Clinica del Pueblo
Leading By Example
Legal Action Center (LAC)
Licensed Clinical Professional Counselors of Maryland (LCPCM)
Life Renewal Services
Lower Shore Clinic
Maryland Addiction Directors Council (MADC)
Maryland Association of Behavioral Health Authorities (MABHA)
Maryland Association for the Treatment of Opioid Dependence (MATOD)
Maryland Chapter, American Academy of Pediatrics (MDAAP)
Maryland Clinical Social Work Coalition (MCSWC)
Maryland Coalition of Families (MCF)
Maryland-DC Society of Addiction Medicine (MDDCSAM)
Maryland Hospital Association (MHA)

Maryland Psychiatric Society (MPS)
Maryland Psychological Association (MPA)
Maryland Public Health Association (MdPHA)
Maryland Rural Health Association (MRHA)
Mary T Maryland
Medmark Treatment
Mental Health Association of Maryland (MHAMD)
Mental Health Association of Frederick County
Mental Health Center of Western Maryland
Mid Shore Behavioral Health (MSBH)
Mindful Healing Works
Montgomery County Federation of Families for Children's Mental Health
Montgomery Recovery Services
MSA the Child and Adolescent Center
National Alliance on Mental Illness, Maryland Chapter (NAMI Maryland)
NAMI Metro Baltimore
NAMI Carroll County
NAMI Frederick County
NAMI Harford County
NAMI Howard County
NAMI Kent and Queen Anne's
NAMI Lower Shore
NAMI Montgomery County
NAMI Prince George's County
NAMI Southern Maryland
National Council on Alcoholism and Drug Dependence, Maryland Chapter (NCADD Maryland)
New Journey
On Our Own of Maryland (OOOMD)
Parker Psychiatric Services
Partnership Development Group (PDG) Rehabilitation Services
Pathways
People Encouraging People (PEP)
Phoenix Health Center
Pro Bono Counseling Project
Prologue
Psychotherapeutic Treatment Services
Reginald Lourie Center for Children's Social and Emotional Wellness
Rehabilitation Systems, Inc.
Serenity Health
Seventy Times Seven Wellness Mission
Sheppard Pratt
Silverman Treatment Solutions
Southern Maryland Community Network
Starting Point
Step by Step of Maryland

Thrive Behavioral Health
Transformation Health
Trauma Informed, Inc.
University of Maryland Medical Center (UMMS) Community Psychiatry Division
Upper Bay Counseling and Support Services
Vesta
Voices of Hope
Volunteers of America
Washington Pain Center
Wells House
WIN Family Services

cc: Boyd Rutherford, Lieutenant Governor
Dennis Schrader, Secretary, Maryland Department of Health
Aliya Jones, M.D., Deputy Secretary for Behavioral Health
Steve Schuh, Deputy Secretary for Health Care Financing and Medicaid