
TO: Mental Health and Disability Services Regions
FROM: Iowa Department of Health and Human Services (HHS)
Division of Behavioral Health and Disability Services
SUBJECT: Startup, System Building, and Sustainability COA Codes - Corrected
EFFECTIVE: Immediately

Guidance

Startup and sustainability costs are service-related costs but are not directly attributable to the actual services provided to an individual. Limitations of the available chart of accounts (COA) codes in the past has resulted in coding of direct and indirect service costs being coded together under the same COA code. This prevented HHS and the MHDS Regions from knowing the true cost of service provision versus the cost of preparedness/cost of maintaining access.

Direct services provided should be coded under the COA code for the service and be associated with an individual. Indirect costs for startup, system building, and sustainability should be coded using the following list of codes and should not be associated with individuals. If a region makes startup, system building, or sustainability payments to a single provider for more than one type of service, project codes should be used to differentiate each service.

Regions should code transactions for FY24 and after in accordance with this guidance.

List of Startup, System Building, and Sustainability Codes

44379 – Crisis Services – System building and Sustainability – 23-Hour Observation, Mobile Response, Crisis Stabilization Residential (CSRS), Crisis Stabilization Community Based

44396 – Crisis Services – Startup and Sustainability - Access Centers

50379 – Supports for Employment – System building and Sustainability – Supported Employment and Individualized Placement and Supports

32379 – Core EBTs – System Building and Sustainability – Permanent Supported Housing

45379 – Core EBTs – System Building and Sustainability – Family Psychoeducation, Peer Support

42379 – Additional Core EBTs – System Building and Sustainability – Wellness Centers, Intensive Residential Service Homes (IRSH), Assertive Community Treatment (ACT), Intensive Psychiatric Rehabilitation (IPR), Transitional Living

Scenarios

Payment for Empty Beds

- A region pays an IRSH provider for holding an empty bed while an individual is hospitalized. Since the payment is directly attributable to an individual, it should be associated with the individual in CSN and coded as a regular service cost using COA code 42329.
- Payment to a CSRS provider for empty beds due to non-utilization. Since the payment is not directly attributable to an individual, it should be coded as a sustainability cost using COA code 44379 and not associated with an individual.
- An access center submits a Cost of Preparedness Budget Worksheet that indicates the region should contribute \$20,000 towards guaranteed CSRS beds. 44396 should be used for these access center -related sustainability costs, as they are not directly attributable to an individual. For a standalone CSRS program, sustainability costs should be coded under 44379.

Medicaid Payment is Not Sufficient

- It is not allowable to make a payment to a provider for an individual service because the Medicaid rate for the service does not cover the full cost.
- It is allowable for MHDS Regions to make payments to providers for costs other than those reimbursable by Medicaid to assure that access to a service is maintained for residents of the region. This cost of preparedness could include expenses such as rent, maintenance, staffing availability during down time, etc. These should be coded as sustainability costs using the appropriate code from the above list and not associated with individuals.

Block Grants

- Block grant payments for actual provision of services should be split among the individuals served and associated with those individuals in CSN.
- Block grant payments for costs that are not for direct provision of services (i.e., provider administration, cost of preparedness) should be coded as sustainability costs and not associated with individuals.
- For block grants that include payment for both direct provision of services and indirect sustainability costs, the region will need to track these expenses in a manner that will enable them to be reported separately using the appropriate codes as outlined in this guidance.

INQUIRIES:

For further information, contact Rob Aiken at raiken@dhs.state.ia.us or 515-669-8002 or Don Gookin at dgookin@dhs.state.ia.us or (515) 669-8001.