

Associate Degree Variance for CCBHC Program Case Managers
State Guidance
10/21/2024

Provider Question

Can CCBHCs request a variance to the Associate degree credentialing requirement for case managers who have secured a Case Management Certificate from CCRI and/or with relevant work experience?

State Response

I. Requirement for Current Variance

For all CCBHC providers with case managers currently in practice who do not have an Associate degree as required by the BHO regulations – including those who have a certificate from a BHDDH-approved curriculum as described in the COVID Technical Bulletin Variance dated 10/14/21 (**Attachment 1**) – a request must be submitted for a variance from the credential regulation. The request must include the following information per case manager:

- A copy of the case manager’s current resume;
- A description of their role within your organization (such as which program they currently support, e.g., ACT, IHH/now ICTT, or Healthy Transitions); and
- Whether the individual has successfully completed and secured a Case Management certificate from CCRI.

The request for variance must be submitted by **no later than 4 p.m. on November 1, 2024** to the BHDDH Office of Licensure and Standards via email to Gary.Amitrano@bhddh.ri.gov, Rosemary.Petteruti@bhddh.ri.gov, and lynne.m.ruelle@bhddh.ri.gov. BHDDH will review each submission and either approve or deny the request. If the request is approved, the case manager may remain in their current position and continue to bill per established Medicaid rates for their services. If the request is denied, the case manager shall be reassigned.

II. Requirement for Future Variance

Please be advised that from this point on, before a CCBHC hires a person who does not have an Associate degree to work as a case manager, the CCBHC is required to request a variance.

The request for variance should include information on the employee’s education and experience, such as whether the employee has a pre-associate’s certificate from a college in a human services field (e.g., the CCRI certificate in case management or other human service field). Other information that should be included is a current resume and the program the individual will be working in. This information must be submitted to the BHDDH Office of Licensure and Standards via email to Gary.Amitrano@bhddh.ri.gov, Rosemary.Petteruti@bhddh.ri.gov, and lynne.m.ruelle@bhddh.ri.gov. BHDDH will review each submission and either approve or deny the request.

If the request is approved, the case manager may remain in their current position and continue to bill per established Medicaid rates for their services. If the request is denied, the case manager shall be reassigned. Please be advised that without an approved variance, an agency that bills Medicaid for the services of a case manager without an Associate's degree is non-compliant with the RI CCBHC Certification Standards.

BHDDH is in the process of drafting CCBHC licensing regulations that may allow for certain exceptions to the Associate degree requirement, which would eliminate the need for this type of variance. However, until such regulation is promulgated and finalized, CCBHCs as BHO licensed agencies are required to submit variance requests for all case managers who do not have an Associate degree (i.e., an AA or AS degree).

III. Additional Clarifications

- This guidance and the described variance request process is applicable only to CCBHCs. If a CMHC has not become a CCBHC, it does not need to request a variance as described above.
- **Case managers and Community Psychiatric Supportive Treatment Specialists (CPSTS) are separate and distinct roles per Medicaid.** This means:
 - **For case managers:** CCBHCs may request a variance to the Associate degree requirement per the above guidance. We have amended the RI CCBHC Certification Standards to remove the AA or AS degree as a credentialing requirement (**Attachment 2**).
 - **For CPSTS:** The State will not issue a variance for CPST Specialists, but if an employee or applicant does not have an AA or AS, they may be hired as and work as a case manager because we have amended the RI CCBHC Certification Standards to include case managers as a qualified provider type for ACT, ICTT, and Healthy Transitions (**Attachment 2**).



DEPARTMENT OF BEHAVIORAL HEALTHCARE, DEVELOPMENTAL DISABILITIES & HOSPITALS
**OFFICE OF FACILITIES AND PROGRAM
STANDARDS AND LICENSURE**

14 Harrington Road
Cranston, RI 02920

TEL: (401) 462-2317
FAX: (401) 462-0393

TECHNICAL BULLETIN

Technical Bulletin Number:	Office of Licensure-TB-4
Effective Dates:	10/14/21
Subject:	Blanket variances due to the current pandemic
Applies to:	All BHOs

Purpose: BHDDH is providing technical assistance to all BHDDH-licensed providers to maintain compliance during the State of Emergency that is a result of the current pandemic.

Background: Due to an uptick of COVID and decrease in staffing, BHDDH is issuing this technical bulletin.

Information: The following blanket variance is available to all Licensed Behavioral Health Providers based on the State of Emergency that is a result of the Coronavirus pandemic. It is the Department's understanding that CCRI is providing an internship and training pilot project that will focus on recruiting prospective applicants to Health Home Teams and MHPRRs. The internship/ training program will provide training to the interns/ staff who will work as case managers in IHH/ACT/MHPRRs and direct care residential staff. This variance will allow for the minimum educational requirement for the interns/staff to be a high school diploma.

1. In accordance with, 212- RICR-10-10-1, The Rules and Regulations for the Licensing of Organizations and Facilities Licensed by the Department of Behavioral Healthcare, Developmental Disabilities and Hospitals, Section 1.6.10 (A)(2)(b), BHDDH has granted a variance allowing staff providing case management **to have a minimum of a high school diploma** and working or will be working towards their Associate Degree or their Licensed Chemical Dependency Professional (LCDP). ***This variance will remain in effect until October 1, 2022.***
2. 212- RICR-10-10-1, The Rules and Regulations for the Licensing of Organizations and Facilities Licensed by the Department of Behavioral Healthcare, Developmental Disabilities and Hospitals, Section 1.6.11 (A)(3) and (B)(4), "Staff providing case management must show evidence of ***working towards*** the required qualifications within this regulation." ***No variance is granted regarding this provision. Interns must remain enrolled at CCRI or must be working demonstrably towards LCDP licensure.***

Based upon the above variance approval, the following documentation will be required to maintain the “spirit of the regulations.”

- 1) Copy of the curriculum of the “boot camp.”

BHDDH Office of Licensure will further request the following on a quarterly basis as a condition of the granting of this variance:

- 2) Evidence of ongoing instruction and on the job training that includes confirmation that the affected staff are appropriately being trained for the position.
- 3) Provide proof of documentation including but not limited to dates, times and the clinical supervision that took place inclusive of who provided the clinical supervision and topics discussed for the interning direct care residential staff and case managers.
- 4) Evidence that after successful completion of the job training, interns/staff are continuing to work towards the required qualifications within this regulation (Associate Degree/LCDP).

If you will be participating in the above areas, you will be required to notify the Office of Licensure with an Agency Plan by ***October 31, 2021.***

RI CCBHC Certification Standards: Addendum 11
10/21/2024

1. The purpose of this addendum is to:
 - a. Remove the Associate degree credentialing requirement for Targeted Case Management providers (see [RI CCBHC Certification Standards](#), pg. 147). CCBHC providers may request a credentialing variance from BHDDH; and
 - b. Add Case Managers as a qualified provider type for Assertive Community Treatment (ACT), Integrated Community Treatment Team (ICTT), and Healthy Transitions (HT) (see [RI CCBHC Certification Standards](#), pgs. 156 - 158).
2. All other certification requirements and conditions in the [RI CCBHC Certification Standards](#) issued on May 10, 2024 remain in effect.