

January 24, 2024

DELIVERED VIA HOUSE OF DELEGATES SPEAK [PORTAL](#)

The Hon. Rodney T. Willett, Chair
Health and Human Services - Behavioral Health Subcommittee
Virginia House of Delegates
General Assembly Building
201 North 9th Street,
Richmond, Virginia 23219

RE: Pyramid Healthcare Testimony in Opposition to HB 434, A bill to require the Department of Behavioral Health and Developmental Services to require certain facilities to prepare and record certified discharge plans

Dear Chairman Willett and distinguished members of the Subcommittee:

The Pyramid Healthcare, Inc. (“Pyramid Healthcare”) family of companies is providing information and feedback below regarding House Bill 434 (2024) which would require that any residential substance use disorder (“SUD”) treatment facility licensed by the Department of Behavioral Health and Developmental Services (“DBHDS”) must prepare and record a certified discharge plan upon a patient’s discharge or withdrawal from the facility. While we provide discharge-planning services for our clients and believe this is crucial to ensuring long-term recovery, we oppose the bill as written and urge you to incorporate our feedback when considering the legislation.

As background, Pyramid Healthcare is an integrated behavioral healthcare system serving Medicaid and commercial clients in 8 states across a continuum of residential and outpatient substance abuse, mental health, autism, and eating disorder treatment services. We employ 3,100 team members across our 80+ active facilities.

In Virginia, we operate two facilities and plan to continue building out our substance use disorder treatment capacity across the Commonwealth. Our Newport News center has been operating since July 2021 and offers 150 withdrawal management/detox and residential treatment beds for adults. In that location, we also offer outpatient treatment for adults with substance use and co-occurring disorders, including intensive outpatient services, outpatient services, certified peer recovery support services, case management support, and family therapy. Our New River Valley facility opened in August 2023 and currently offers residential and partial hospitalization programming for adults struggling with substance use and co-occurring disorders throughout the New River Valley, and we intend to ultimately offer the full continuum of care in this location as well, including withdrawal management services. Finally, we will soon begin the construction of a 100-bed residential detoxification and rehabilitation treatment facility in King George County, Virginia.

To be clear, discharge planning is essential to ensuring our patients are able to sustain long-term recovery. Currently, Pyramid Healthcare provides discharge planning services for our clients; however, the language of the legislation duplicates existing safeguards, puts additional administrative burden on providers, and invites punishment to high-quality providers serving vulnerable patient populations.

Pyramid Healthcare maintains third party accreditation from the Commission on Accreditation of Rehabilitation Facilities (“CARF”) for all of our facilities, including our treatment programs in Newport News and the New River Valley. We are licensed by DBHDS’s Office of Licensing and maintain contracts with various payers, including Virginia Medicaid’s managed care organizations (“MCOs”). We also adhere to and advocate for alignment of practices in accordance with the American Society of Addiction Medicine (“ASAM”). As part of these existing agreements, we regularly undergo various audits throughout the year by regulators, accreditors, and payers of our processes, procedures, and documentation for our clients, including related to discharge planning.

As such, creating additional layers of administrative requirements related to discharge planning are unnecessary duplications of existing procedures. Furthermore, this would create additional paperwork burdens for our staff and clinicians who are trying to treat existing clients and admit new clients. It would also create the risk of non-compliance for providers resulting from conflicting requirements that may lead to a corrective action plan (“CAP”) during a survey or audit from one of the entities listed above.

While certain clients may leave our facility against medical advice or be unwilling or unable to sign documentation related to discharge planning, we have robust internal policies and protocols to address these situations and ensure adequate discharge planning has taken place.

It is also unclear what is meant in the bill by “certified discharge plan” and would request clarification.

Please consider this feedback and do not pass this bill out of Committee. Thank you for your support of mental health, behavioral health, and substance use providers in Virginia and for considering my requests on behalf of Pyramid Healthcare. If we can provide any additional information or materials, please contact me at crosier@pyramidhc.com or 667-270-1582. In addition, we invite the Committee to reach out and schedule a visit to our Newport News or New River Valley locations sometime soon to learn more about our programs and services.

Sincerely,



Collan B. Rosier
Vice President of Government Relations

CC: Susan Slough, Committee Clerk
Chandler Brooks, DLS Attorney