

Memorandum

To: Behavior Rehabilitation Service (BRS) providers
Individuals who request initial or continuing authorization of BRS

From: Rusha Grinstead, Children and Families Policy manager

Date: March 25, 2025

Subject: Updates and reminders about BRS authorization requirements

Effective immediately, all BRS requests for children not in the legal custody of Oregon Department of Human Services or Oregon Youth Authority must include a release of information (ROI) signed by the guardian, or by the child if aged 18 or older.

- ROIs must comply with Medicaid information exchange requirements described in Oregon Administrative Rule (OAR) [410-120-1360](#), [ORS 179.505 through 179.507](#), [ORS 411.320](#), [42 CFR Part 2](#), [42 CFR Part 431 Subpart F](#) and [45 CFR 205.50](#).
- Oregon Health Authority (OHA) has updated the BRS [authorization](#) and [reauthorization](#) request forms to ask for custody status and ROI as described above.

Effective April 1, 2025, OHA will process all requests based on the information received.

- The LPHA will use the documentation provided with the request to determine medical necessity and medical appropriateness for BRS.
- If information is missing or insufficient to make a medical necessity and medical appropriateness determination, OHA may deny the request.
- OHA expects BRS providers to share information to support these requests as required by OAR [410-170-0030\(3\)\(e\)](#).

OHA will share any compliance issues with the agency program analyst for the specific BRS program.

Why is this happening?

These changes will ensure BRS compliance with state and federal requirements and align with what is expected from other residential facilities in Oregon. An ROI is required for children not in the legal custody of OYA or ODHS to comply with OARs [410-120-1360](#) and [410-120-1380](#).

What should you do?

Both BRS providers and individuals who request BRS authorization should engage in continuous training in BRS processes. In addition:

BRS providers:

To ensure compliance with BRS and Medicaid rules, please be sure to:

- Respond to all documentation requests by the date requested.
- Train all BRS staff on [documentation standards](#).
- Conduct [weekly updates and reviews](#) of service documentation records.
- Review and follow requirements for [BRS information sharing](#) (page 3) and [BRS documentation standards](#) (pages 3-6) below.
- Adhere to the confidentiality of BRS client information described in OAR [410-170-0030\(3\)](#), including obtaining an ROI when necessary.

Requesters:

To avoid denials based on insufficient documentation, please be sure to:

- Review and follow [documentation requirements for initial and continuing BRS authorization requests](#) below (page 3).
- For all requests, include documentation that demonstrates the medical need for BRS. If needed, use the “Notes” section of the request form to explain how the documents support the need for BRS.

- For requests for continued authorization, include required documentation and ensure the documentation describes the child's response to BRS, current goals and progress to reach stated goals. Work closely with the BRS provider to obtain this information to include in the request.
- Respond to all requests for additional information by the due date listed on the pending notice.
- Obtain an ROI when required as described above.

Questions?

If you have any questions about this process described in this announcement, call 503-979-8354 or email BHMC@oha.oregon.gov.

If you have questions about the Medicaid policy or OARs described in this announcement, call 503-545-0885 or email Medicaid.Programs@odhsoha.oregon.gov.

You may also visit OHA's BRS [web page](#) for additional resources including program updates, past memos, frequently asked questions and training recordings.

Documentation requirements for BRS authorization requests

For standard or retroactive authorization requests:

The [BRS Authorization Form](#) lists common documents to include and related OARs. Requests that require diagnostic assistance must include the [Code Assistance Request Form](#).

For continued authorization (reauthorization) requests:

Required documentation includes:

- BRS service notes from the last 30 days
- Current BRS service plan

The [Continued Authorization Form](#) lists other documents to include if they support the request and related OARs.

If the request form is incomplete:

OHA will send a pending notice asking for a corrected form or additional information, or deny the request based on administrative error.

Information sharing requirements for BRS providers

OAR [410-170-0030](#)(3)(e) requires BRS providers to share BRS client information with the requesting agency, OHA, or other governmental oversight or licensing entities.

BRS contractors and providers must promptly provide any information or written documentation they have related to the BRS client or the BRS program when:

- Requested by the agency for any reason; and
- Requested by OHA or other governmental oversight or licensing entities to evaluate, oversee or audit the BRS program.

Documentation standards for BRS providers

BRS providers must complete the following records with all information required in the OARs for BRS:

- [Service plans and assessments](#)
- [Service documentation](#) for each service provided according to the goals in the client’s service plan
- [Weekly review](#) of BRS services provided

Service plans and assessments

Description	OAR
Initial Service Plan (ISP), completed by a social service staff person within two business days of admission	410-170-0070 (1)
Assessment and Evaluation Report (AER), completed by a social service staff person within 45 calendar days of admission	410-170-0070 (2)

Description	OAR
Master Service Plan (MSP), completed by a social service staff person within 45 calendar days of admission	410-170-0070 (3)
Master Service Plan Updates, completed by a social service staff person no later than 90 days from the date the last Master Service Plan was completed. Examples of longest allowable timeframes: <ul style="list-style-type: none"> • 1st MSP update: 135 days from admission • 2nd MSP update: 225 days from admission • 3rd MSP update: 315 days from admission 	410-170-0070 (4)
Aftercare and Transition Plan (ATP), completed by a social service staff person in preparation for discharge	410-170-0070 (5)
Discharge Summary <ul style="list-style-type: none"> • Summarizes the BRS client’s discharge plan, including the BRS client’s progress towards service goals • Completed by a social service staff person within 15 days of planned discharge 	410-170-0070 (6)
Aftercare Summary <ul style="list-style-type: none"> • Summarizes the client’s status, progress towards goals, and BRS services offered during the 180 day aftercare time period • Completed by a social service staff person within 210 days following the discharge 	410-170-0070 (7)

Service documentation

BRS providers must complete service documentation each time a program coordinator, social service staff person, or direct care staff under the supervision of a social service staff person, provides a service to support the goals of the BRS client’s service plan.

Minimum documentation requirements are in OAR [410-170-0080\(5\)\(b\)](#). For each service, documentation must include:

- Legal name of the BRS client
- Date of service
- Name and position of the staff member providing the service
- Length of time staff person spent providing the service: Best practice is start time and end time
- Description of the service provided: OARs [410-170-0020](#), [410-170-0070](#) and [410-170-0080](#) describe BRS services in detail. BRS services can include:
 - Milieu therapy (in concert with other BRS services)
 - Crisis counseling
 - Individual counseling
 - Group counseling
 - Parent training
 - Skills training
 - Aftercare (monitoring, service coordination, crisis intervention, skills training and parent training)
- Description of the BRS client's participation in the service

Weekly review of services provided

OAR 410-170-0080(5)(c) and (d) require BRS providers to do the following each week:

- Record in the BRS client's file the total number of service hours provided to the client each day. Include a breakdown of each type of service provided.
- Have social service staff review this information for quality, content and appropriateness in accordance with the BRS client's service plan.