

**Nevada Department of Health and Human Services
Department of Public and Behavioral Health
Bureau of Behavioral Health Wellness and Prevention
Problem Gambling Services**



**DHHS Problem Gambling Services
FY2020 & FY2021 STRATEGIC PLAN**

Version 3.0:
November 19, 2020



**Department of Health and
Human Services**

Helping people. It's who we are and what we do.

DHHS Problem Gambling Services FY2020 & FY2021 Strategic Plan v.3.0



Department of Health and Human Services

Helping people. It's who we are and what we do.

This project has been funded by the Nevada Department of Health and Human Services (DHHS), Division of Public and Behavioral Health (DPBH), Bureau of Behavioral Health Wellness and Prevention.

For further information about Nevada's Problem Gambling Services, contact:

Kim Garcia

Social Service Program Specialist III
Nevada Department of Health and Human Services
Bureau of Behavioral Health, Wellness and Prevention
4126 Technology Way | Carson City, NV 89701
T: (775) 684-4057 | Fax (775) 684-4185
E: k.garcia@health.nv.gov | www.dhhs.nv.gov

For further information about the strategic plan project consultancy, contact the Senior Consultant:

Jeffrey Marotta, Ph.D., ICGC-II

Problem Gambling Solutions, Inc.
(503) 706-1197
Jeff@ProblemGamblingSolutions.com

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Mission & Vision

In 2008, the DHHS Advisory Committee on Problem Gambling drafted the following Mission and Vision statements to guide their decisions:

Mission:

To support effective problem gambling prevention, education, treatment, and research programs throughout Nevada.

Vision:

Improve the public health of Nevadans through a sustainable and comprehensive system of programs and services that reduce the impact of problem gambling.

These Mission and Vision statements have become the cornerstone of the Department of Health and Human Services strategy to reduce the impact of problem gambling on Nevadans.

Acknowledgements

Project Participants

The Department of Health and Human Services (DHHS) would like to extend its gratitude to all those involved in this project, including the Advisory Committee on Problem Gambling; DHHS Office of Community Partnerships and Grants staff Kim Garcia, Cindy Routh, Lori Follett, and Cathy Council; Strategic Planning Survey respondents, and the participants of the Problem Gambling Strategic Planning Workshop held in Las Vegas, Nevada, on October 30, 2018.

All of you who participated in this project were instrumental in identifying needs, generating ideas on how to meet those needs, and discussing how to best align problem gambling services within Nevada's larger health and human service system. Your dedication to improving problem gambling services and supporting the health of individuals, families, and communities has been demonstrated by all the effort you put forth. Our effort has produced a strategic plan that builds upon our accomplishments and steers us to ever improving outcomes.

Work that Informed the Plan

Understanding DHHS Problem Gambling Services exists within the context of broader public health systems, as well as within the larger problem gambling field, efforts were made to incorporate knowledge, structure, and strategies from authoritative works. The following documents most notably informed this Strategic Plan:

Dassopoulos, A., St. John, S. & Bernhard, B. (2018). *The Nevada Problem Gambling Study Annual Report*. UNLV International Gaming Institute. Las Vegas, NV.;

Marotta, J., Hynes, J., Rugle, L., Whyte, K., Scanlan, K., Sheldrup, J., & Dukart, J. (2017). *2016 Survey of Problem Gambling Services in the United States*. Boston MA: Association of Problem Gambling Service Administrators.;

Nevada Department of Health and Human Services (2016). *Problem Gambling Services Strategic Plan: 2017 to 2019*. Carson City, NV: Author.

Oregon Health Authority (2015). *Problem Gambling Services in Oregon: 2016 to 2020 System Improvement Plan*. Salem, OR: Author, Dr. Jeff Marotta, Problem Gambling Solutions.

Substance Abuse and Mental Health Services Administration, *Leading Change 2.0: Advancing the Behavioral Health of the Nation 2015 – 2018*. HHS Publication No. (PEP) 14-LEADCHANGE2. Rockville, MD: Substance Abuse and Mental Health Services Administration, 2⁰14.

¹ All photos used in this document were downloaded from Pexels.com. All photos on Pexels can be used for free for commercial and noncommercial use without attribution.

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DHHS Problem Gambling Services FY2020 & FY2021 Strategic Plan v3.0

Kim Garcia, Problem Gambling Program Coordinator, DPBH, BHWP
Prepared by Problem Gambling Solutions, Inc.

November 2020

Executive Summary

Between the original drafting of this Strategic Plan in November 2018 to the November 2020 version (v3.0), Nevada Department of Health and Human Service's Problem Gambling Services (PGS) had experienced several dramatic impacts on its budget and programs. The 2019 legislature revised the funding structure for the Revolving Account for the Prevention and Treatment of Problem Gambling from a \$2 per machine levy on gaming operators to a straight \$2,000,000 per year general fund allocation for state fiscal years 2020 and 2021. The legislature also approved the DHHS proposal to relocate the problem gambling program from the Office of Community Partnerships and Grants (OCPG) to the Bureau of Behavioral Health Wellness and Prevention (BHWP). In the second half of FY2020, the COVID-19 pandemic reached Nevada creating a statewide public health and economic crisis. The BHWP supported gambling treatment system rapidly retooled to meet challenges faced by public health needs by expanding telehealth services and developing new public awareness campaigns. Amidst a state budget crisis caused by the pandemic, the 2020 legislature enacted budget reductions across state agency departments that ultimately lead to a 36% reduction to the FY2021 Problem Gambling Services budget (from \$2,000,000 to \$1,274,513).

DHHS Problem Gambling Services has evolved over the past decade into a system comprised of six program areas: Prevention, Research, Workforce Development, Treatment, Information Management, and Administration. Investments into each of these program areas shifted over the past three years with some program areas impacted more than others (see Figure 1).

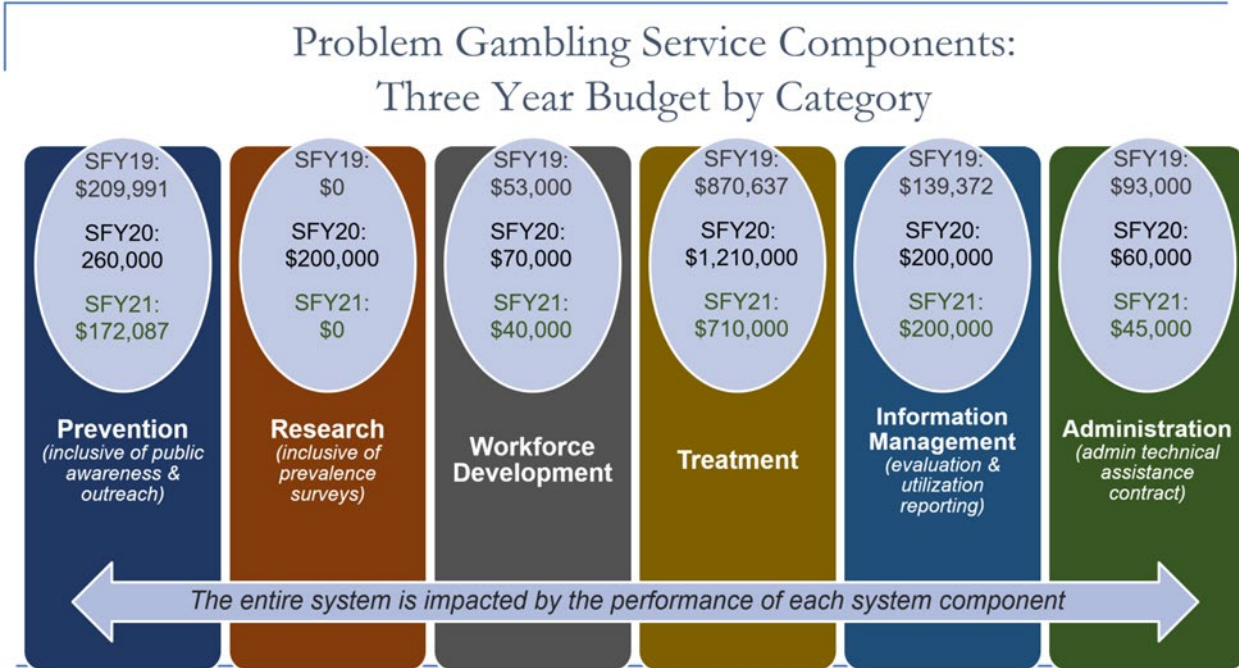
Due the revised FY2021 Problem Gambling Services budget, the DHHS Problem Gambling Services FY2020 & 2021 Strategic Plan was revised in November of 2020 into version 3.0 to reflect the new program realities.

The present strategic planning document was organized into five sections. The first section provided an introduction into state supported problem gambling services in Nevada from its early history though a description of services and programs though 2019, the year this Plan was developed. The second section detailed the strategic planning process that was undertaken to develop the Plan including a description of the need assessment findings. Section three introduces a framework, principles, and logic model that have guided the development of this Plan and that serve as signposts for Nevada's

journey in developing services to reduce gambling related harm. The Behavioral Health Continuum of Care Model serves as the framework used to describe Nevada’s vision for a comprehensive service approach for addressing problem gambling. This framework is woven into a set of principles to guide the implementation of the Plan by DHHS grantees and others who will participate in its implementation. Section four describes the DHHS Problem Gambling Services’ six program domains accompanied with a goal followed by a list of enhancement activities intended to achieve the stated goal. The goals and enhancement activities outlined conform to the ACPG’s vision and mission, and the Plan’s framework, guiding principles, and logic model. The final section of this Plan, Appendix A, includes five Exhibits that provide structure, program details, and expectations set for grantees of DHHS funded problem gambling treatment.

Some elements of this Plan, such as the DHHS Problem Gambling Treatment Providers Guide in Appendix A, provide specific and detailed changes that went into effect on July 1, 2020, while other elements of this Plan were developed to provide a high-level summary of improvement efforts that will be explored over the plan’s two-year period. This Plan will be used as a roadmap for DHHS and the ACPG to develop a work plan that will detail the action steps to be taken to achieve the goals and guide initiative development from one point to another. This Plan represents an important hallmark in the continued efforts to support effective problem gambling prevention, education, treatment, and research programs throughout Nevada.

Figure 1:



Treatment: Formula driven based on SFY20 spending and performance. Prevention: \$22,087 KPS3; \$150,000 NCPG. WFD: \$15,000 Conference; \$25,000 CASAT. Administration does not include DPBH personnel costs for staff involved with the problem gambling services program.

DHHS Problem Gambling Services FY2020 & FY2021 Strategic Plan v3.0

Kim Garcia, Problem Gambling Program Coordinator, DPBH, BHWP
Prepared by Problem Gambling Solutions, Inc.

November 2020

Introduction to the DHHS Problem Gambling Services Plan

Nevada was an early adopter of legalized commercial gaming, has become a leader in the global gaming industry, yet was behind many other states in establishing dedicated funding to address problem gambling. In 2005, Nevada introduced legislation to expand its approach to legalized gambling by investing in the development of problem gambling treatment and prevention systems. The legislation resulted in the creation of a Revolving Account for the Prevention and Treatment of Problem Gambling and an Advisory Committee on Problem Gambling (ACPG) to advise the Department of Health and Human Services (DHHS) in its administration of this account. Program funding was linked to the number of slot machines operating in the state, \$2 per slot machine per quarter, totaling an amount sufficient to build the infrastructure for a statewide gambling treatment system and the groundwork for a problem gambling prevention and workforce development system. Over one decade has passed since problem gambling service funding was established and over that time services for problem gamblers have evolved and now support six problem gambling treatment centers, a prevention grant, a public awareness grant, a gambling treatment court, two workforce development grants, a research grant program, and a strong gambling treatment evaluation system. While the problem gambling service system (PGS) has developed over the years funding for that system has not been stable beginning at \$1,700,000 in 2008, hitting a low of \$720,637 in 2012, rebounding to approximately \$2,000,000 in 2020, then reduced in reaction to a state budget crisis to \$1,167,087 for state fiscal year 2021.

During the process of developing the 2017 to 2018 DHHS Problem Gambling Services Strategic Plan, it became clear that without additional funding the system would not be able to achieve its stated vision to “improve the public health of Nevadans through a sustainable and comprehensive system of programs and services that reduce the impact of problem gambling.” In response to this need, the ACPG developed a Legislative Workgroup that unsuccessfully forwarded a legislative concept to increase program funding during the 2017 legislative session. In January of 2018, this ACPG committee regrouped to begin work on developing a new legislative concept to restructure the way in which DHHS problem gambling services are funded with an aim to increase and stabilize the program’s annual operating budget.

During the same period the ACPG was developing a legislative concept and plan to increase program funding, the decision was made by DHHS to request legislative approval to relocate their problem gambling program from the Office of Community Partnerships and Grants (OCPG) to the Bureau of Behavioral Health Wellness and Prevention (BHWP) in State Fiscal Year 2020.

As a result of the work by DHHS and the ACPG, the 2019 legislature revised the funding structure for the Revolving Account for the Prevention and Treatment of Problem Gambling from a \$2 per machine levy on gaming operators to a straight \$2,000,000 per year general fund allocation for state fiscal years 2020 and 2021. The legislature also approved the DHHS proposal to relocate the problem gambling program from OCPG to BHWP. In the second half of FY2020, the COVID-19 pandemic reached Nevada creating a statewide public health and economic crisis. The BHWP supported gambling treatment system rapidly retooled to meet new challenges by expanding telehealth services and developing new public awareness campaigns. Amidst a state budget crisis caused by the pandemic, the 2020 legislature enacted budget reductions across state agency departments that ultimately lead to a 42% reduction to the FY2021 Problem Gambling Services budget (from \$2,000,000 to \$1,167,087).

Due to the problem gambling program impact of these legislative actions, the DHHS Problem Gambling Services FY2020 & 2021 Strategic Plan, created prior to the 2019 legislative session, was revised in November of 2019 into version 2.0 then again in November of 2020 into version 3.0 to reflect new program realities.

The present strategic plan combined all problem gambling program elements into a unified and integrated plan. This plan seeks to inform future decisions, provide strategic direction, and build from program successes to offer a comprehensive approach to service development.

The DHHS Problem Gambling Services strategic plan summarizes what has been learned from several resources: consumers, treatment providers, prevention providers, gaming industry collaborators, program administrators, a review of DHHS supported program evaluation research, and a review of state and federal policy and identified best practices.

The DHHS Problem Gambling Services Strategic Plan includes:

- Section I: Capacity of the Service Delivery System
- Section II: Strategic Planning Process
- Section III: Framework, Guiding Principles, and Logic Model
- Section IV: Goals, Activities, and Enhancements

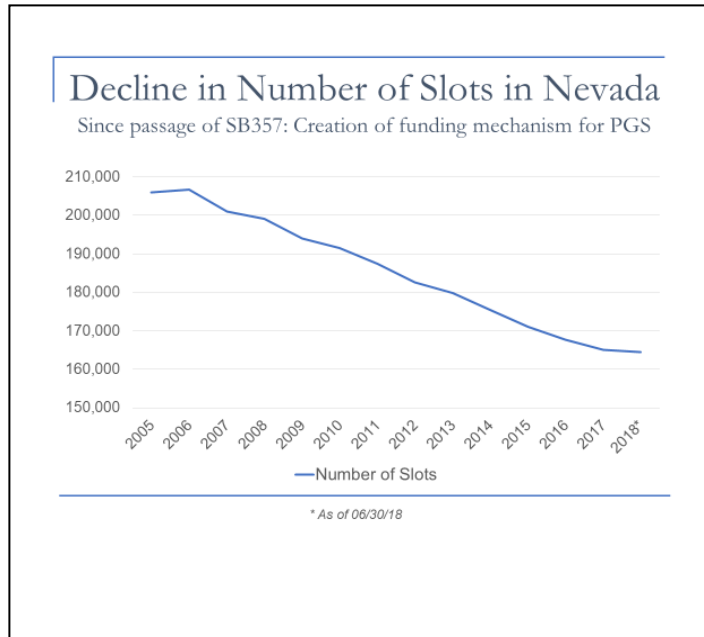
Some elements of this Plan, such as the DHHS Problem Gambling Treatment Providers Guide in Appendix A, provide specific and detailed changes that went into effect on July 1, 2019, while other elements of this Plan were developed to provide a high-level summary of improvement efforts that will be explored over the plan's two-year period. This Plan will be used as a roadmap for DHHS and the ACPG to develop a work plan that will detail the action steps to be taken to achieve the goals and guide initiative development from one point to another.

I. Capacity of the Problem Gambling Service Delivery System

A. Funding²

In 2005, the Nevada State Legislature passed Senate Bill 357 to create the Revolving Account for the Prevention and Treatment of Problem Gambling and an Advisory Committee on Problem Gambling (ACPG) to advise the Department of Health and Human Services (DHHS) in its administration of this account. The 2007 Legislature amended NRS 463.320(e) to remove a sunset provision and left the 2007 funding in place for 2008. The program budget for 2008 was \$1,700,000. As Nevada entered a state fiscal crisis, the program budget received a series of reductions beginning in 2009 with a \$200,000 reduction, and another \$100,000 reduction in 2010. As the state fiscal crisis worsened, the 2011 Nevada State Legislature passed budget bill AB500, which temporarily reduced from \$2 to \$1 the slot tax revenue directed to DHHS problem gambling services. This reduction remained in effect through SFY 2013. During these lean budget years, the gambling treatment grantees agreed to take a reduction in service reimbursement rates in order to serve more problem gamblers, and all DHHS funded problem gambling prevention activities were discontinued. In SFY 2014, as the state emerged from the impact of the Great Recession, funding was restored to the \$2 per slot machine revenue calculation.

Although funding was restored to the original calculation, transfers to the Revolving Account for the Prevention and Treatment of Problem Gambling had declined year over year since 2014. What the framers of the 2005 Senate Bill 357 had not accounted for was a progressive decline in the number of slot machines beginning in 2006 (see Figure 2). Since 2005, the number of slots has declined by approximately 20% even though the number of gaming licenses remained relatively stable. The decline in slot machines is believed to be due to changes in slot machine technology and player gaming preferences.



During the 2019 legislative session, the ACPG advised the Governor’s Office to revise the DHHS Problem Gambling Program funding structure to be uncoupled from the number of licensed slot machines, replaced with a tax on gaming percentage fees imposed by NRS 463.370, and based on a needs assessment conducted in 2018, increase the DHHS problem gambling services annual budget to \$5.68 million. Although the

² Note: All budget figures presented in this section are rounded to the nearest \$1,000.

proposed changes were largely supported by the gaming industry and other problem gambling service proponents, the extent of the increase was tempered back by the legislature from a requested \$3.4 million annual increase to an annual increase of \$631,000 over the previous biennium budget. Furthermore, the legislatively approved \$2 million annual problem gambling program allocation for fiscal years 2020 and 2021 were drawn directly from general funds as opposed from the proposed new tax on gaming percentage fees. Amidst a state budget crisis caused by the pandemic, the 2020 legislature enacted budget reductions across state agency departments that ultimately lead to a 42% reduction to the FY2021 Problem Gambling Services budget (from \$2,000,000 to \$1,167,087).

The most recent survey of all U.S. states' problem gambling services took place in 2016.³ At that time, Nevada ranked 13th out of the 50 U.S. states in terms of per-capita public funds invested in problem gambling services. The average per-capita allocation for problem gambling services in the 40 states with publicly funded services was 37 cents; Nevada's per capita public investment was 38 cents in FY2021. Investing 38 cents per Nevadan to mitigate gambling related problems is less than half the annual per-person problem gambling service budget of several other states with a much smaller gaming presence such as Oregon, Massachusetts, and Delaware.

B. The Advisory Committee on Problem Gambling (ACPG)

The Advisory Committee on Problem Gambling consists of nine Governor appointed members that by statute (NRS 458A.060) represent a broad stakeholder group including three members from the gaming industry, two members who work in the area of mental health, one member who represents organizations that provide assistance to problem gamblers, and three members with personal or professional knowledge and experience concerning problem gambling. When the ACPG was created in 2005, most of the duties, as defined in statute and in subsequent bylaws, were directly related to developing, reviewing, recommending, and monitoring the grant award system within DHHS for programs funded by the Revolving Account for the Prevention and Treatment of Problem Gambling. Over the years, as the information management system became more sophisticated and procurement methods relied more on data and experienced reviewers, the reliance on the ACPG to advise DHHS on specific grant awards diminished. During the 2017 legislative session, the ACPG successfully promoted the passage of a bill that refocused their efforts to more effectively reach its mission "to support effective problem gambling prevention, education, treatment, and research programs throughout Nevada." The legislation expanded the ACPG advisement duties to inform and assist the Governor, Legislature, and DHHS on issues and trends in the area of problem gambling. The purpose of providing advice and information was to (a) Assist in the establishment of priorities and criteria for funding programs and services for the prevention and treatment of problem gambling; (b) Provide services relating to the development of data, the assessment of needs, the performance of evaluations and technical assistance concerning problem gambling; and (c) Recommend legislation, regulations or the adoption of public policy concerning problem gambling. The ACPG duties also include reviewing problem gambling service recommendations made by DHHS and reviewing relevant reports.

³ Marotta, J., Hynes, J., Rugle, L., Whyte, K., Scanlan, K., Sheldrup, J., & Dukart, J. (2017). 2016 Survey of Problem Gambling Services in the United States. Boston MA: Association of Problem Gambling Service Administrators.

C. Nevada Problem Gambling Treatment System

The DHHS supported problem gambling treatment system was launched in 2005 with several of the original grantees continuing to provide services throughout the program's existence. The system design was based on supporting problem gambling treatment "centers of excellence" as opposed to creating a wide distribution network of providers. Characteristics of a "center of excellence" model include (a) a limited number of treatment programs, typically only one or two in population centers; (b) programs offer a variety of services including group, family, and individual treatment modalities; (c) larger grant amounts by virtue of program size and small number of total treatment grants; and (d) high standards and funder expectations inclusive of provider qualifications, documentation practices, and performance in a number of defined areas. Another distinguishing characteristic of Nevada's publicly funded gambling treatment system is its variety of providers. DHHS does not restrict what type of entity may apply for problem gambling treatment grants and this has resulted in some providers being accredited substance abuse treatment agencies, some being exclusive problem gambling treatment centers, some holding non-profit status, and others not. The grant selection process has emphasized qualifications and experience in treating problem gamblers.

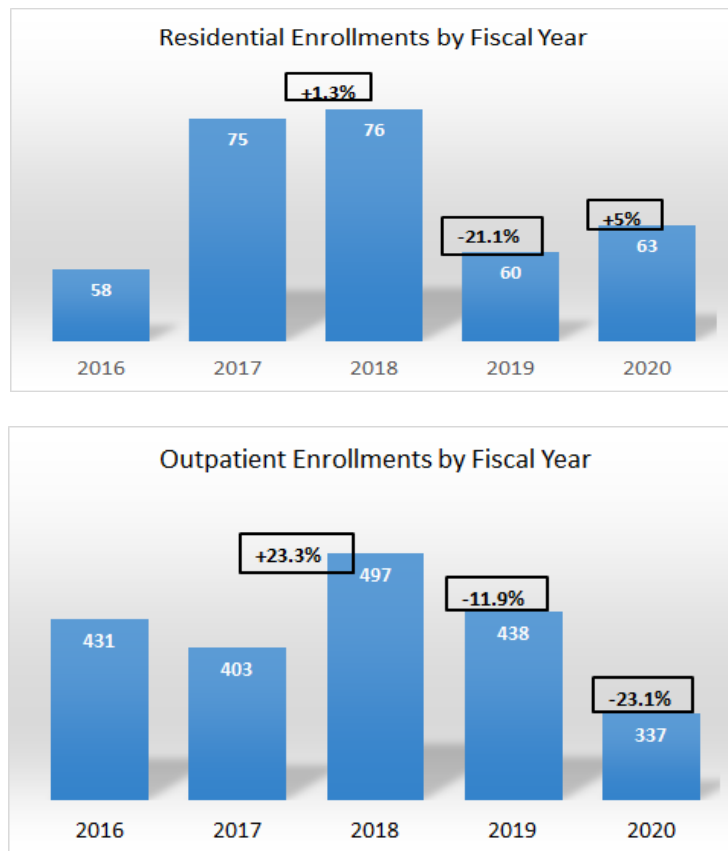
In SFY2021, the year this plan was revised into version 3.0, there were five DHHS funded problem gambling treatment grantees. The largest program, in terms of number of enrollments each year, is The Dr. Robert Hunter International Problem Gambling Center (PGC) located in Las Vegas. Each year the PGC treats approximately 280 individuals with the majority participating in its Intensive Outpatient Program (IOP). IOP programs are defined as those programs providing 9 hours or more treatment services per week. The other Southern Nevada gambling treatment grantee provides mainly outpatient gambling treatment where most clients receive one to six hours of treatment services per week. Mental Health Counseling and Consulting, located in Henderson, has been a DHHS grant funded gambling treatment provider since 2017. The other three gambling treatment grantees are in Northern Nevada, including two in Reno and one in Fallon. The Reno Problem Gambling Center provides mainly outpatient treatment services with the option of participating in an IOP program while the other Reno grantee, Bristlecone Family Resources' Gambling Addiction Treatment and Education (GATE) program, primarily provides residential gambling treatment services. The remaining gambling treatment grantee, New Frontier Treatment Center, has a catchment area that serves the vast majority of rural Nevada. New Frontier has offices located in Lovelock, Battle Mountain, Elko, West Wendover, Ely, Caliente, and Fallon; however, only one of those locations (Fallon) are served by a Certified Problem Gambling Counselor (CPGC) or Certified Problem Gambling Counselor Intern (CPGC-I). Gambling treatment services outside of those areas are provided via a secure web-based video conference technology that links a CPGC to a client in a remote location; typically, the client's personal home computer. Prior to the beginning of the COVID-19 pandemic in March 2020, problem gambling treatment services provided through telehealth technologies were seldom used. After March 2020, telehealth services for problem gambling treatment had become widely used by all the gambling treatment grantees.

The two residential gambling treatment programs, Bristlecone Family Resources and New Frontier Treatment Center, are charged with serving the residential gambling treatment needs for the entire state. Persons living in Southern Nevada are eligible to receive fully subsidized treatment at one of the Northern Nevada residential gambling treatment programs, inclusive of transportation costs. However, very few persons living outside of the residential treatment centers' geographic areas utilize this level of service. Both residential gambling treatment programs are embedded in larger addiction

treatment agencies. These agencies provide problem gambling screens to clients from all their services and those needing gambling treatment are referred into their gambling treatment program.

Over the period that the UNLV Nevada Problem Gambling Study have been tracking DHHS gambling treatment enrollments, fiscal years 2012 to 2020, enrollments into DHHS supported residential problem gambling treatment programs have mostly increased year to year until 2019 when they declined 21%. Enrollments into outpatient problem gambling treatment programs followed an upward trend through 2015, declined over fiscal years 2016 and 2017, followed by growth in fiscal years 2018 and decline in 2019 and 2020 (see Figures 3 & 4)⁴. The decline in 2020 was attributed to the COVID-19 pandemic when enrollments perceptively dropped off in March and April, coinciding with the shutdown of gaming establishments. Forty-one percent of all clients entering treatment in fiscal year 2019 endorsed

Figures 3 & 4



all 9 characteristics of Gambling Disorder defined in the DSM-5, with an average score of 7.7 (*scores of 8 and 9 are categorized in the DSM-5 as “severe” current severity level*). About 73% of clients were in problem gambling treatment for the first time, with about 20% attending one program in the past. Together these statistics demonstrate that persons are not seeking help for their gambling problem until it becomes very severe.

Programs receiving treatment funding are required to be staffed by Certified Problem Gambling Counselors (CPGC) or Certified Problem Gambling Counselor Interns (CPGC-I). Counselor certification is funded and administered through the State of Nevada’s Board of Examiners for Alcohol, Drug and Gambling Counselors.

Problem gambling treatment services in Nevada have provided help to thousands of individuals and in the process saved lives, preserved families, and strengthened communities. The system of services has been evolving from its 2005 inception and will continue to evolve with the implementation of this strategic plan.

⁴ Enrollment data reported via email on October 31, 2020 by Andrea Dassopoulos, Ph.D. Candidate and Project Manager for the Nevada Problem Gambling Study, International Gaming Institute, University of Nevada, Las Vegas

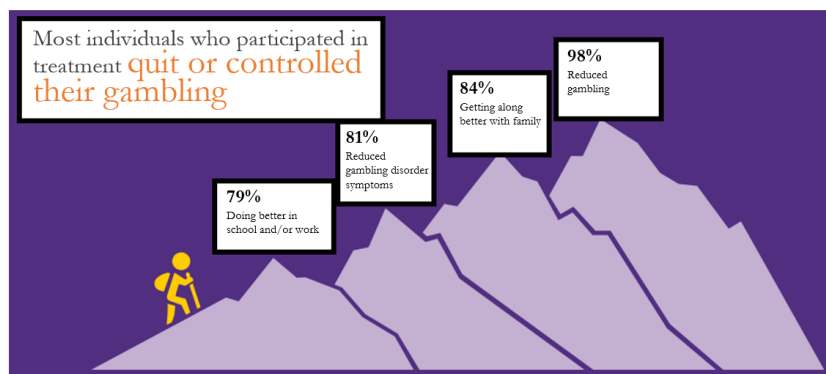
D. Nevada Problem Gambling Treatment Information Management and Research System

DHHS funded problem gambling treatment in Nevada is informed by one of the nation's premiere evaluation systems. Beginning in 2006, the University of Nevada's International Gaming Institute (IGI), housed within the University of Nevada, Las Vegas (UNLV), has been contracted as the Information Management Contractor to evaluate state-funded problem gambling treatment programs in Nevada. Over the years the evaluation system has evolved and with can now be conceptualized into four components:

1. Utilization Management. Each month treatment providers enter encounter procedure codes that are utilized to generate fee-for-service reimbursement claims. Under this function, the Information Management Contractor serves as claims processor.
2. Program Evaluation. Treatment programs enter intake data, discharge date, and submit client satisfaction surveys to the Information Management Contractor. This data includes client demographic information, information about their presenting problems, gambling related consequences, and information about their treatment process including if the client met the criteria for a successful discharge (see Appendix A for criteria).
3. Quality Assurance & Compliance Monitoring. Each year DHHS funded gambling treatment grantees are provided a program review by a review team composed of a contracted program consultant, members of the UNLV IGI team, and DPBH staff. During the review program documents and client files are audited for accuracy in documenting service claims and compliance to program standards (see Appendix A).
4. Research. In SFY2020, the investment into research was greatly expanded only to be suspended in SFY 2021 due to program budget cuts. One research program that continued was the gambling treatment client follow-up evaluation and behavior change analysis. This effort has resulted in enrolling over 70% of all Nevada gambling treatment clients. Study participants are contacted 30 days, 90 day, and 12-months after their enrollment date to assess treatment outcomes along several domains (see Figure 5 for example domains).

Figure 5.

Treatment Works*



81% of individuals with problem gambling reported reduction in symptoms and improved quality of life with treatments and supports (at 12-months post enrollment).

* Based on surveys conducted 12-months post enrollment with individuals who obtained DHHS supported problem gambling treatment. Andrea Dassopoulos, 2020. Annual Gambling Treatment System Performance Report. Produced by the International Gaming Institute, University of Nevada, Las Vegas for the Nevada Department of Health and Human Services.

E. Prevention and Public Awareness Efforts

The efforts to establish a problem gambling prevention and public awareness system have not been as successful as the development of the gambling treatment system. Since the origination of DHHS supported problem gambling services, problem gambling prevention was considered an important area to address albeit of secondary importance of building a gambling treatment safety net. With extremely limited funds the ACPG identified the need to strategically address prevention efforts and advised the Department



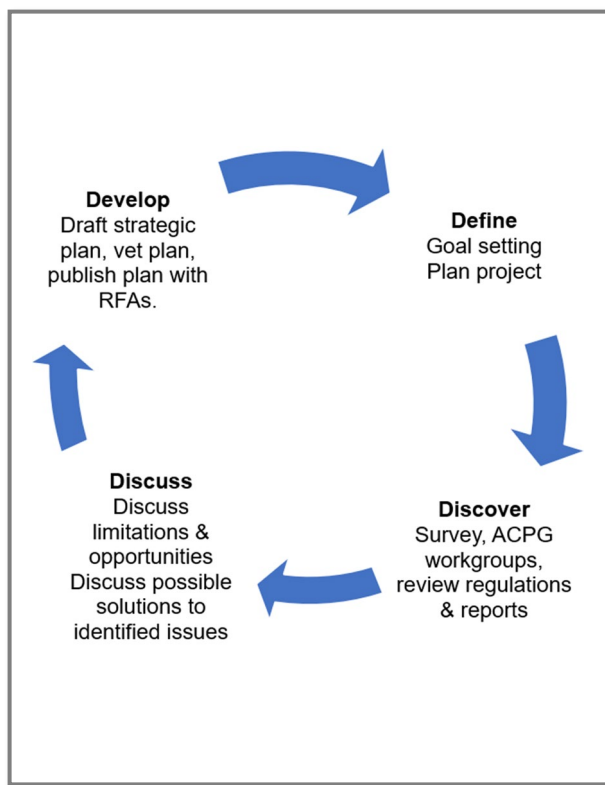
to acquire consultation services to assist in the development efforts. By 2009, DHHS had an ACPG endorsed Problem Gambling Prevention Five-Year Strategic Plan. Two years into that plan, the budget for DHHS supported problem gambling services was dramatically reduced, resulting in the discontinuation of funding for all problem gambling prevention grants. In SFY 2014, investments in problem gambling prevention services returned, although they did not pick-up where they left off. Much of the problem gambling prevention infrastructure that had been in place was lost when programs ceased to be funded. Further, funding for prevention programs did not return at the same level as demand for treatment services were on the rise, leaving fewer dollars available for prevention programs (approximately \$200,000 a year). When prevention funding was restored, problem gambling prevention grants were awarded to two entities, the Nevada Council on Problem Gambling (NCPG) and the Center for the Application of Substance Abuse Technologies (CASAT) at the University of Nevada, Reno (UNR). The CASAT program developed a problem gambling prevention program for Nevada colleges and universities and piloted that program at UNR. This left the NCPG with being the primary provider of problem gambling prevention activities for the rest of the state. During the SFY 2018 and 2019 budget cycle, concerned over weakening problem gambling prevention grantees ability to successfully operate their proposed programs due to fragmenting the distribution of allotted prevention funds (\$200,000) resulted in awarding a single prevention grant for statewide problem gambling prevention services. The grant awardee, the NCPG, applied a dual approach to its problem gambling prevention efforts through utilizing its existing infrastructure to expand core education, awareness and advocacy programs, and developed an outreach and strategic partnership program.

A problem gambling services needs assessment conducted in 2018 identified the program areas of prevention and public awareness as among those areas in greatest need of funding and development. At that time, the estimated budget needs to build an effective problem gambling prevention and awareness program was placed at \$2.5 million annually. Although the request to the 2019 legislature for these funds were not approved, a program budget increase occurred resulting in an additional \$50,000 annual investment into this program area. Due to large gap between estimated need and available funding, the areas of problem gambling public awareness and problem gambling prevention are arguably the most under-funded components of the DHHS problem gambling services system.

II. Strategic Planning Process

Beginning in 2008, structured processes were routinely implemented to assess the DHHS problem gambling system's strengths, weaknesses, opportunities, and threats. These assessments were tasked under the program consultation contract and were conducted in conjunction with ACPG guidance and participation. The system assessments have been linked to strategic planning processes and considered an integral component of the efforts to continually improve services. The project vision for strategic planning, including the assessment component of strategic planning, included the following objectives: (a) Provide problem gambling services to more people in need; (b) Identify gaps in problem gambling services and explore means to meet current and emerging service demands; (c) Improve the effectiveness and efficiency of problem gambling services supported by DHHS; and (d) Support and acknowledge DHHS grantees, the Advisory Committee on Problem Gambling, and service consumers as partners in reducing harm caused by problem gambling.

Figure 6: DHHS PG Program Strategic Planning: Project Process



A. Needs Assessment Methods: The needs assessment methods, depicted as the “Discover” phase in Figure 6, differed from past efforts due to circumstances leading up to the start of the 2018 strategic planning process. One of the differences was the development of several ACPG sub-committees in 2017 and 2018 that were tasked with focusing on assessing and developing initiatives in specific areas: (a) treatment reimbursement rates, (b) public awareness needs and solutions, (c) utilizing Medicaid for treatment reimbursement, and (d) legislative actions to address issues related to the system's funding mechanism. The current strategic planning assessment utilized the work of these committees through incorporating information derived from their meeting minutes and reports. Another deviation from past assessments was replacing the use of interviewing key informants (grantees and ACPG members) with the administration of a strategic planning survey distributed via a mass emailing to hundreds of individuals identified by DHHS as potential stakeholders. Ten completed surveys were returned from this effort, all from current DHHS PGS grantees and ACPG members. Additional information was used to form the basis of the assessment from written PGS program reports, reviews of Nevada statutes, and reviews of other reports relevant to problem gambling services.

Information from the discovery phase was next used to develop a Strategic Planning Workshop where

stakeholders could join the discussion from meeting locations in Las Vegas, Carson City, Fallon, or by phone. Participants discussed the limitations embedded within the current PGS system, where opportunities existed, possible solutions for meeting identified needs, and two proposals brought forth by DHHS; (a) moving the PGS program from its current location in the Office of Community Partnerships and Grants (OCPG) to the Bureau of Behavioral Health Wellness and Prevention (BHWP) and (b) increasing Medicaid utilization. This information helped inform the current strategic plan. A description of the discussions surrounding the most salient system strengths and limitations are provided below.

B. System Strengths: Those involved in the assessment expressed several positives about the DHHS problem gambling system. The following includes a list of the most commonly expressed system strengths.

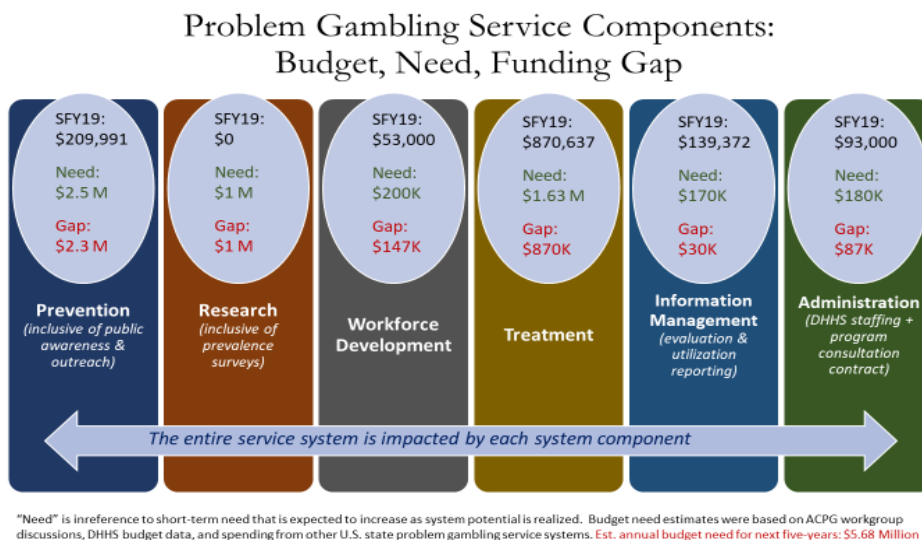
- Dedicated funding for PGS
- Committed stakeholders, including providers
- Over ten years of experience implementing the problem gambling services system with historical learning taking place along the way
- Sound system framework
 - System has worked well in past albeit funding has been inadequate
 - Historically the ACPG, DHHS, and providers have worked very well together.
 - Gambling treatment “Centers of Excellence” model working as evidenced by providers meeting demanding performance benchmarks.
 - Program evaluation, monitoring, and support system viewed as very strong
- Financial means to pay for gambling treatment not a barrier to help seekers
- Treatment is available from specialized and competent providers in the state’s two most populous areas and rural treatment services are available
- DHHS and ACPG actively engaged in service improvement initiatives
- Providers motivated to develop their PG services
- Strong advocates
 - ACPG, public support, political support, and gaming industry support

C. System Limitations: Central to all conversations regarding system weaknesses or limitations revolved around an outdated program funding formula that produced insufficient funds to support a comprehensive problem gambling service system. The list of specific system limitations and improvement initiatives that stakeholders brought forward is long and represented in detail within the 2017 to 2019 DHHS Problem Gambling Services Strategic Plan. As program funding has continued to decline, the larger system limitations described in the prior Strategic Plan were not addressed in SFY 2017 through SFY 2019 and remain relevant today.

A macro view of system gaps is depicted in Figure 7 where the problem gambling service system is represented along six core program areas. Along these program areas the 2019 State Fiscal Year (SFY19) budget is provided, the budget “need” is provided, and the budget gap between SFY2019 actual obligations (as of October 2018) and estimated budget need is calculated. The problem gambling

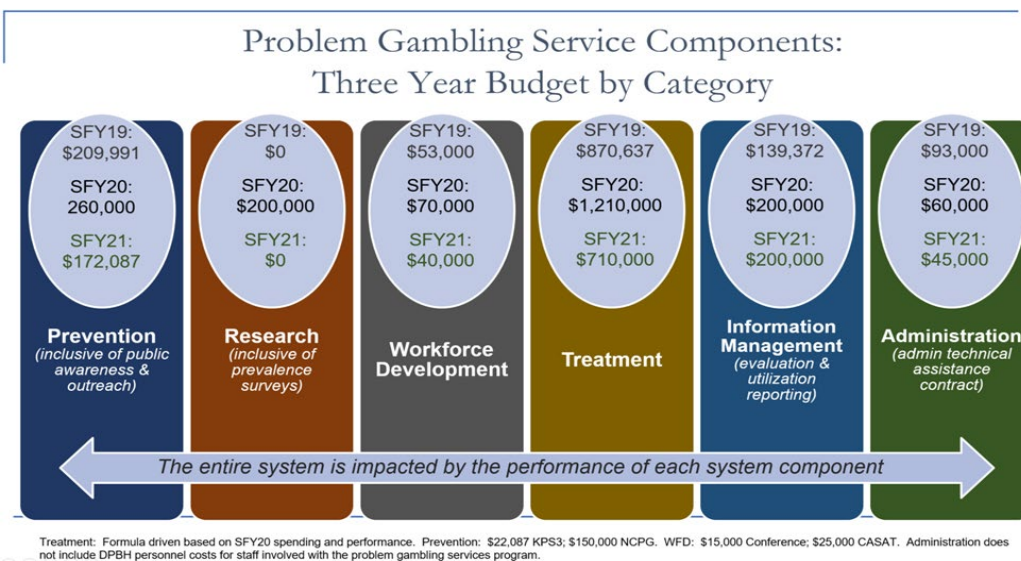
services budget need estimates were based on the combination of ACPG Sub-Committee discussions, DHHS budget data, and spending information from other U.S. state problem gambling service systems. The budget need estimates reflect what amount of annual funds are needed to support a comprehensive problem gambling services system over the next five years. These estimates are presented here at the request of the ACPG to illustrate the gap between how the current problem gambling service budget is funded and what amount would be needed to realize the ACPG vision to “improve the public health of Nevadans through a sustainable and comprehensive system of programs and services that reduce the impact of problem gambling”.

Figure 7:



During the 2019 legislative session, efforts to reduce the gap between program need and available funding resulted in a funding increase. A special legislative session was called in 2020 to respond to a statewide budget crisis that resulted in a budget decrease. The shifting problem gambling program budget and its impact by program area over the past three years is depicted in Figure 8.

Figure 8:



III. Framework, Guiding Principles & Logic Model

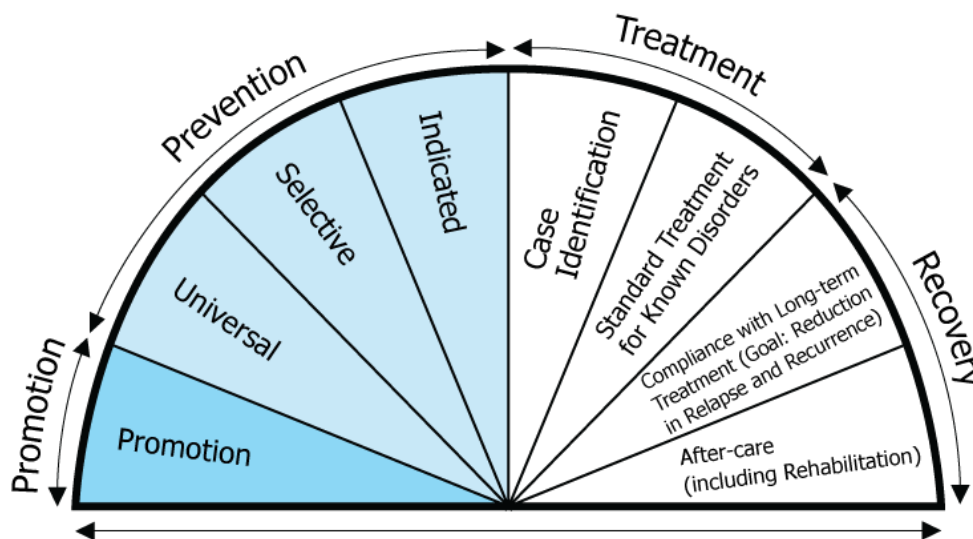
This section introduces a framework, principles, and logic model that have guided the development of this plan and that will serve as signposts for Nevada’s journey in developing services to reduce gambling related harm. The Behavioral Health Continuum of Care Model serves as the framework used to describe Nevada’s vision for a comprehensive service approach for addressing problem gambling. This framework is woven into a set of principles to guide the implementation of the plan by DHHS grantees and others who will participate in its implementation.

A. Continuum of Care

Programs and services to prevent and address problem gambling in Nevada can be defined within a Continuum of Care (Figure 9): a scope of services for individuals, groups, and communities before, during, and after they experience a behavioral health problem such as problem gambling. These services include the following.

- Health Promotion: These strategies are designed to create environments and conditions that support behavioral health and the ability of individuals to withstand challenges. Promotion strategies also reinforce the entire continuum of behavioral health services.
- Prevention: Delivered prior to the onset of a disorder, these interventions are intended to prevent or reduce the risk of developing a behavioral health problem.
- Treatment: These services are for people diagnosed with a behavioral health disorder.
- Recovery Support: These services support individuals’ recovery while in treatment and after.

Figure 9: Behavioral Health Continuum of Care



Ideally, the Continuum of Care will offer assistance to people at all levels of need, from prevention and health promotion for those who do not gamble or who gamble only recreationally to efforts that include screening and referral for at-risk individuals and brief interventions for those in the early stages of problem development as well as treatment services for disordered gamblers, and, finally, recovery support and rehabilitation. The infrastructure and resources in the current DHHS problem gambling system is not sufficient to ideally support this continuum of service at a statewide level; however, this model can be applied in limited scope and serve as a vision for longer term system development if or when additional resources are made available. For this continuum of services to most effectively function it must be supported by an appropriate infrastructure addressing workforce development, system administration, technical assistance, and information management, and requires ongoing evaluation and adjustment to meet changing needs.

To learn more about the Behavioral Health Continuum of Care Model including prevention strategies, principles of cultural awareness and competency, and other approaches used to implement this model, visit the Substance Abuse and Mental Health Services Administration (SAMHSA) website (<http://www.samhsa.gov/prevention>). SAMHSA is the federal agency that leads public health efforts to advance the behavioral health of the nation. Nevada's publicly funded behavioral health services, including problem gambling services, support approaches advocated by SAMHSA.

B. Guiding Principles

The following principles guided the development of this strategic plan and will guide the implementation of the plan by DPBH grantees and others who will participate in its implementation.

- Work to reduce gambling related harm while maintaining a neutral position in neither being for or against legalized gambling.
- Support the mission and vision of the Advisory Committee on Problem Gambling.
- Enhance existing infrastructure whenever possible, rather than creating something new.
- Engage populations of highest need in designing programs and interventions for problem gambling and related issues.
- Work collaboratively across agency boundaries to make interventions more impactful.
- Address gambling through a public health lens, working at a community level to create norms and environments that support healthy behavior.
- Base priorities on data.
- Choose interventions based on evidence of efficacy and proven methods to increase success.
- Provide interventions along the entire Continuum of Services, with a priority on making treatment accessible, recovery supported, and increasing the focus on prevention as resources grow.
- Evaluate and adjust as the work progresses; make data driven decisions.
- Messaging to the public about responsible gambling and problem gambling awareness is provided in a manner that is non-blaming, hopeful, and supports the normalization of help seeking for persons with gambling related problems.

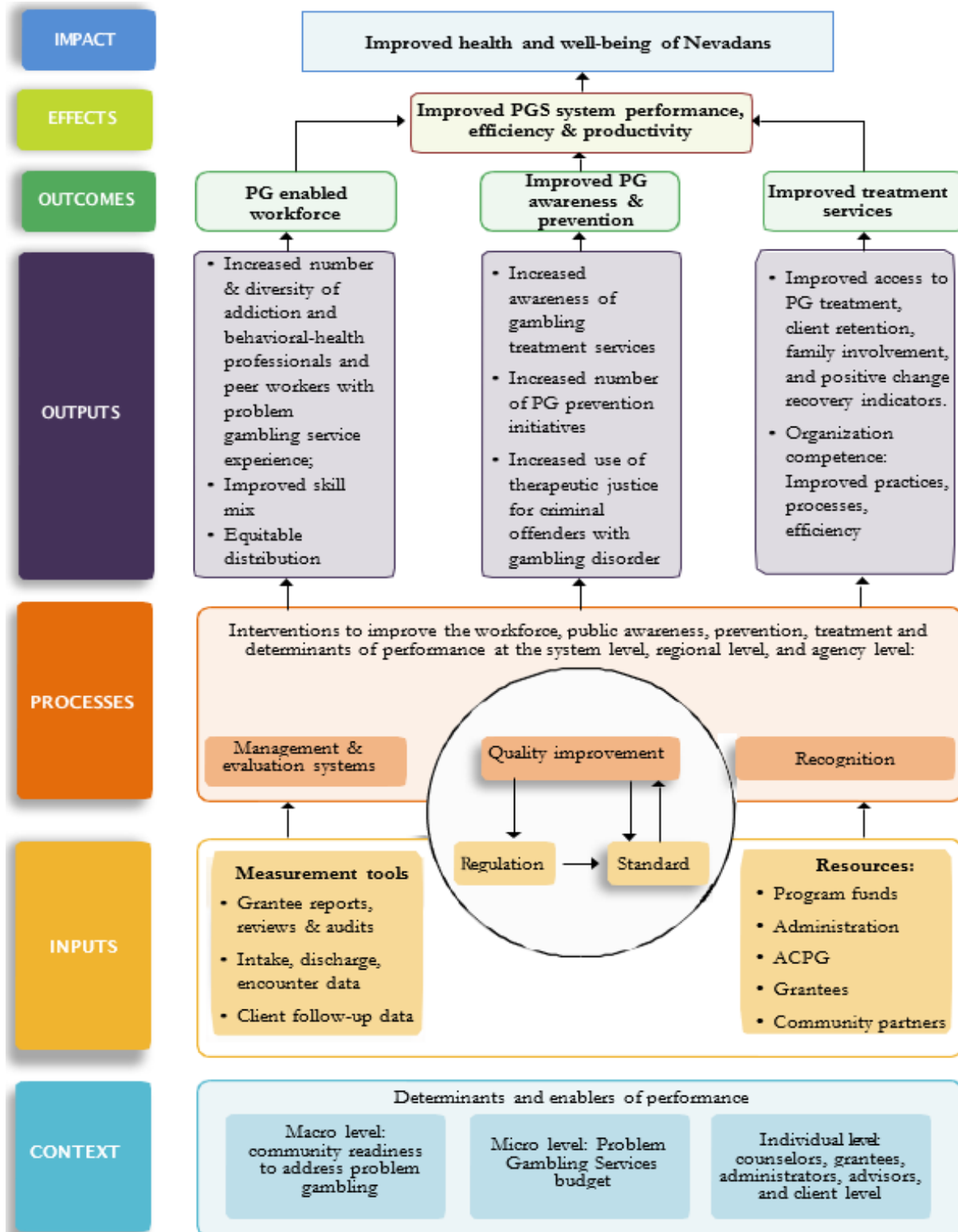
- When developing programs and materials, work collaboratively with consumer and provider communities.
- Strive to bring prevention efforts to the local level and create community empowerment.
- Don't develop and implement projects in isolation; utilize available resources, nurture existing partnerships and develop new ones.
- Cultural and linguistic competency will be the expectation and the rule.
- Prevention programs should enhance protective factors, reverse or reduce risk factors, and strategically take place when targeted populations are at key transition points.

C. Logic Model

Goals, objectives, and actions are driven and impacted by the context in which they are derived and implemented. Given the importance of context, it is important to frame the DHHS Problem Gambling Services Strategic Plan and acknowledge its performance and productivity are rooted in factors related to federal, state, and local health systems, economic factors, sociological factors, and political influences. These in turn impact community readiness to address problem gambling including policy makers willingness to support problem gambling services through legislative budgets and policies. In addition to these macro level influences, several contextual variables exist at the micro level, such as the program budget and the characteristics of the program administration, characteristics of grantees, the competency and motivational level of individual stakeholders, and the characteristics and level of complexity among clients. DHHS PGS interventions work in a dynamic relationship with macro and micro level influences impacting overall program productivity, efficiency and effectiveness.

The following framework for improving DHHS Problem Gambling Services provides a logic model structure towards the understanding of how and why different components of the DHHS Problem Gambling Services Strategic Plan interact with one another (see Figure 10). The model focuses on system development, defined here as the DHHS Problem Gambling Service system as historically developed and funded.

Figure 10. Logic Model for Improving DHHS Problem Gambling Services



IV. Goals, Activities, Enhancements

Improving DHHS Funded Problem Gambling Services

This strategic plan follows the problem gambling system needs assessment that was completed in 2018 and represents a continuation of previous strategic planning processes. Information gathered during the needs assessment and solution finding phases were categorized into five domains that corresponded with the DHHS Problem Gambling Services system's historical conceptualization, then adding "research" as a sixth domain. These domains represent program components, funding designation categories, and service procurement categories. These domains are:

- A. Administrative Operations
- B. Information Management
- C. Prevention and Health Promotion
- D. Treatment
- E. Workforce Development
- F. Research

Each of the above problem gambling service components is accompanied with a goal followed by a list of enhancement activities intended to achieve the stated goal. The goals and enhancement activities outlined below conform to the ACPG's vision and mission, and the Plan's framework, guiding principles, and logic model as previously described.

A: Administrative Operations

Goal:

Maintain the highest standards of stewardship over essential services supported by the Revolving Account for the Prevention and Treatment of Problem Gambling including establishing strategic directions and program policies, developing needed infrastructure, and operating effective procurement, funding, and reimbursement systems.

Program Stewardship Moved to the Bureau of Behavioral Health Wellness and Prevention

The Director of the Department of Health and Human Services has administrative oversight of the programs funded by the Revolving Account to Support Programs for the Prevention and Treatment of Problem Gambling (NRS 458A). Since the fund was established in 2003, the Directors Office, under the Grants Management Unit, later rebranded the Office of Community Partnerships and Grants (OCPG), housed the staff assigned to oversee the problem gambling grants, contracts, and staff the ACPG. In the Director's FY2020-FY2021 agency request budget to the Governor's Office the problem gambling services program budget was reassigned to the Bureau of Behavioral Health Wellness and Prevention (BHWP) and this request was subsequently approved in the 2019 legislative session.

Fiscal years 2020 and 2021 are viewed as a transitional period for administrative operations of the problem gambling programs. Other than the program being housed in a different division of DHHS, program operations are expected to carryover while planning will take place to explore how best to utilize the program's placement within BHWP to optimize the opportunities afforded by folding problem gambling services into a bureau that oversees the other state funded behavioral health and prevention programs.

BHWP will provide administrative control for the programs funded by the Revolving Account for the Prevention and Treatment of Problem Gambling and the Advisory Committee on Problem Gambling (ACPG) will continue to advise DHHS on the administration of these programs. BHWP will continue to use the existing infrastructure to support a problem gambling service system including (a) maintaining a 1.0 FTE problem gambling program coordination and providing administrative support for problem gambling services; (b) providing staff support for the ACPG; (b) contracting for the development and operation of an information management and evaluation system; (c) contracting technical assistance services to help support program operations, the ACPG, and grantees; and (d) utilizing internal business processes and supports to drive critical functions such as service procurement, service payments, and program leadership.

Enhancement Activities:

- Maintain and enhance human and programmatic capacity to implement this strategic plan.
 - Explore with the Advisory Committee on Problem Gambling (ACPG) measures DPBH Bureau of Behavioral Health Wellness and Prevention (BHWP) can take to support ACPG initiatives and ACPG functions.
 - Examine existing funding structures, allocations, and outputs to determine necessary funding reallocations and make changes based on identified needs and resources.
 - Work with the ACPG in developing processes and practices to effectively and efficiently utilize BHWP staffing resources devoted to supporting the ACPG.
 - Consider developing and/or supporting legislation necessary to increase funding for the problem gambling service system.
- Seek opportunities to improve upon policies and procedures that will support the successful enhancement and implementation of services.
 - Implement revised standards for problem gambling treatment providers and gambling treatment services as recommended in Appendix A.
 - Solicit input from grantees on recommended changes to the grant application process, develop methods to revise service procurement practices, and implement to procure SFY2022 and SFY2023 service grants.
 - Explore methods and policies enabling BHWP to leverage funds from the Revolving Account for the Prevention and Treatment of Problem Gambling with other funding sources.
 - Explore policies, methods, and processes to leverage problem gambling services being placed within BHWP. Exploration of initiatives will include ways to increase the problem gambling intervention capabilities of all BHWP funded prevention and treatment programs.
- Enhance grant oversight activities to increase system performance including quality of care and/or services across all grantees.
 - For treatment grantees, explore enhancement to program review procedures to monitor compliance with gambling treatment standards, including performance benchmarks, and develop corrective action procedures and conditions upon which funding may be reduced, revoked, or redirected.
 - Revise treatment grantee performance benchmarks to remove benchmarks that are not supported by reliable data or shown to benefit the system.
 - Conduct program reviews of service grants to support and monitor grantee progress in meeting grant conditions.
- Enable treatment providers to braid funds from multiple funding streams, such as Medicaid, the Revolving Account for the Prevention and Treatment of Problem

Gambling, charitable donations, and private insurance so that funds are combined, with careful accounting for how dollars from each funding source are spent.

- Revise gambling treatment encounter codes to more closely align with Medicaid billing codes.
- Identify problem gambling treatment grantees that are not Medicaid eligible and provide technical assistance and other supports to explore means to become Medicaid eligible or partner with Medicaid eligible providers.
- Explore and if appropriate enact policies allowing and encouraging grantees to obtain funding from multiple streams including Medicaid and private insurance.
- Foster integration of problem gambling interventions into core elements of other BHWP administered programs.
 - Request the ACPG to advise on strategies and methods that BHWP can take to increase the integration of problem gambling interventions into other BHWP service programs.
 - Explore opportunities and implement when feasible Gambling Screening, Brief Intervention, and Referral to Treatment (SBIRT/GBIRT) model programs to identify, reduce, and prevent problematic gambling behaviors.
 - Where determined feasible, add problem gambling into standardized reporting systems and revise DHHS rules and contracts to encourage agencies to integrate problem gambling interventions into service programs.
 - Explore opportunities and implement when feasible contract conditions to require state funded programs to add education about problem gambling into appropriate educational curricula (e.g. DUII diversion programs).
- Continually assess the performance of the problem gambling service system; seek input from partners, collaborators, and other stakeholders; and engage in efforts to continually improve the effectiveness and efficiency of efforts to address problem gambling.
 - Conduct program reviews to monitor compliance with treatment standards and develop corrective action procedures and conditions upon which funding may be reduced, revoked, or redirected.
 - Assess SFY2019 grant process and recommend changes to address identified issues or areas in need of improvement.
 - Award funds based on performance including service encounter claims, ability to meet performance benchmarks, and program review findings.
 - At least annually review the DHHS Problem Gambling Services Strategic Plan and update as needed.
- Re-engage the strategic planning process to update the Strategic Plan to reflect new program budget realities.
 - Review and adjust service reimbursement rates to support grantees cost of doing business

- Plan for expanded services proportional to budget increase.
- Develop and implement programs and incentives to increase problem gambling awareness and intervention capabilities within other DPBH programs.
 - Explore the development of a Problem Gambling Informed endorsement for mental health and addiction programs and develop technical assistance programs and other incentives for programs to obtain the endorsement.
- Increase administrative staffing to support growth of problem gambling service programs.
 - Assign a dedicated administrative assistance to problem gambling services.
 - Obtain additional program consultation support.
- Engage in a procurement process to develop new contracts and grants to implement an updated Strategic Plan reflective of new program budget realities.

B: Information Management

Goal:

To have access to valid and reliable data on the population being served, utilization of services, program performance, and the outcomes produced. The information management system will support and enhance data-driven program and policy decisions.

Ongoing Delivery:

The information management of DHHS supported problem gambling services has been tasked to three entities. The hub of the information will be the DPBH Bureau of Behavioral Health Wellness and Prevention and its staff assigned to the problem gambling program. BHWP obtains progress reports directly from grantees that include information on progress toward stated goals and fiscal reports. Two other entities serve as business associates in the administration of the problem gambling system; an Information Management contractor, currently UNLV International Gaming Institute, and a Program Consultant contractor, currently Problem Gambling Solutions, Inc. The Information Management contractor is responsible for developing, operating, and reporting on a data management and evaluation system for the problem gambling treatment system. This comprehensive system provides information needed to process claims, determine if treatment grantees are achieving defined performance benchmarks, track trends in enrollments and client outcomes, and provide DPBH with requested data to inform policy and program decisions. The Program Consultant contractor is tasked with, among other duties, designing, coordinating, and reporting on problem gambling treatment program reviews and collecting needs assessment data from the field.

Enhancement Activities:

- Improve staffing levels of the information management team to increase capacity to accomplish below list of enhancement activities and provide timely responses to requested items.
- Embark on efforts to improve the type and quality of data collected by DHHS DPBH from grantees and provided to grantees.
 - Explore revisions to quarterly reporting forms.
 - Develop family client specific forms and information tracking.
 - Seek opportunities to reduce information request redundancy by better utilizing existing information.
 - Seek methods to increase information feedback loops to assist grantees to make data informed program changes.
- Improve the functionality of the problem gambling treatment information management system.
 - Clarify and update the Encounter Data Reporting Requirements (see Exhibit 3).
 - Continue to explore and implements refinements to the user interface for clinics to enter data into the problem gambling treatment data system including exploration and implementation of methods to seamlessly transfer data between clinics' electronic records management systems and the problem gambling treatment information management system.
 - Survey grantees, produce report on recommended adjustments to improve data reporting system to more accurately monitor program performance on defined benchmarks, implement changes and enhancements as funding allows.
 - Create training manual and frequently asked questions document for the user interface.
 - To increase participation in follow-up evaluation, create new forms for clinics to enter updated client contact information as it becomes available to them.
 - Improve database architecture to link intake, encounter, and follow-up data.
- Revise gambling treatment program review protocols to increase effectiveness and transparency and fit with other system changes.
 - Revise protocols and instruments to fit with revisions to the Problem Gambling Treatment Provider Guide (Appendix A).
 - Systematically review encounter claims data for each grantee and match sample of claims with client file documentation and other supporting documentation.
 - Implement methods to assist grantees with meeting performance benchmarks and provider standards upon request and in response to program review findings.
- Develop “Problem Gambling Treatment Program Quality Improvement Report” based on data collected and report findings according to defined performance benchmarks.

- Provide annual problem gambling treatment system performance and evaluation reports and as requested reports to enable data driven program and policy decisions.

C: Prevention, Health Promotion, & Public Awareness

Goal:

Support effective problem gambling prevention and health promotion programs to reduce the occurrence and impact of problem gambling on individuals, families, and communities.

Ongoing Delivery:

In SFY 2018 and 2019 a single problem gambling prevention grant was awarded to provide a number of services including: Development, production and statewide dissemination of problem gambling awareness and education materials; Integration of problem gambling messaging, materials, and referral resources into community awareness and health promotion activities and events; Promotion and coordination of activities in support of Problem Gambling Awareness Month; Maintenance and use of websites and social media to provide and promote problem gambling awareness, information and resources for help; and development of a program to mobilize the recovery community to raise problem gambling awareness.

Enhancement Activities:

- Increase the capacity of prevention efforts to address problem gambling.
 - Explore opportunities to add funding to the DHHS administered problem gambling service system in order to increase the financial investment in problem gambling prevention and public awareness efforts.
 - Explore the possibility of requiring state funded addiction prevention programs to integrate the topic of gambling addiction into their materials and efforts.
 - Focus the use of limited prevention funding to prepare the system for a more robust prevention effort when more funds materialize.
- Expand upon current problem gambling prevention efforts.
 - Identify state-level changes that have the potential to lead to positive impacts on the problem gambling prevention system.
 - Increase the number of collaborative projects and partnerships with organizations where addressing problem gambling is consistent with meeting their mission.
 - Expand upon past efforts to coordinate statewide activities during Problem Gambling Awareness Month.
 - Request grantees further develop their websites as a resource for entities interested in or actively providing problem gambling prevention messaging or other forms of problem gambling awareness activities.

- Continue to support a Speakers Bureau of persons in recovery and actively seek out speaking engagements to increase problem gambling awareness.
- The Bureau of Behavioral Health Wellness and Prevention will collaborate with other DHHS divisions, community service organizations, and other stakeholders to create a system of partnerships to increase efficiency and efforts to address problem gambling.
 - Support and participate in workgroups tasked with further developing problem gambling prevention services.
 - Support meeting and webinar opportunities for providers to network, to form partnerships, and to share successes.
 - Reach out to representatives of state agencies and explore opportunities to partner on common ground initiatives where addressing problem gambling supports fellow state agencies' goals.
 - Continue to work with stakeholders within the criminal justice system to expand use of NRS 458A.200-260: "Civil Commitment of Problem Gamblers Convicted of Crime".
- Develop and fund a statewide problem gambling awareness campaign including widespread promotion of gambling treatment effectiveness and availability.
 - Engage in a discovery and research process to identify marketing strategies and messages.
 - Work toward establish brand identify for DHHS supported problem gambling services.
 - Develop and implement a marketing plan and media strategy.
 - Engage in a structured public relations campaign to increase awareness of problem gambling and available services
 - Use social media and other digital technologies to promote problem gambling prevention and treatment.

D: Treatment System

Goals:

- (a) Support effective and efficient problem gambling treatment programs to reduce the occurrence and impact of problem gambling on individuals, families, and communities.
- (b) Increase problem gambling treatment enrollments by no less than 10% each year.
- (c) 100% of gambling treatment grantees meet defined performance standards.

Ongoing Delivery:

Continue to support a problem gambling treatment system composed of elements that offer a continuum of care from health promotion, screening and referral, brief interventions, distance treatment, outpatient treatment, residential treatment, and longer-term recovery support.

Enhancement Activities:

- Implement new grants with targeted technical assistance services provided to new gambling treatment grantees resulting from the SFY2020 and SFY2021 procurement process.
- Implement revisions made to the Gambling Treatment Provider Guide (see Appendix A).
 - Increase gambling treatment grantee’s fee-for-service rate schedule to support the cost of doing business as a gambling treatment provider in Nevada.
 - Support a 26-day residential stay by increasing the residential treatment client benefit cap from \$3,000 to \$4,000.
 - Increase the length of stay benefit for outpatient clients by increasing the client benefit cap from \$2,200 to \$3,000.
 - Institute “add-on” service procedure codes as reimbursable thereby empowering gambling treatment grantee to more actively engage in client finding outreach, workforce development, and service quality assurance actions.
 - Define “CPGC Fill-in” and revise reimbursement rate for CPGC Fill-in to match CPGC.
 - Remove “Case Cost” as performance standard as this metric had not consistently produced reliable and accurate information.
 - Add “Family Therapy” as separate service and rate to reinforce the system for encouraging family involvement in treatment.
 - Remove intake assessment costs from client benefit caps thereby enabling increased lengths of stay for clients.
 - Reduce maximum per grantee benefit extension request totals from 10% of grant to 5% of grant and better define allowable usage.
 - Develop CPGC-I Supervisor minimum standards for supervision documentation including requiring supervisors to co-sign supervisee intakes, treatment plans, and discharge summaries.
 - Increase the fidelity of documenting client services by requiring all treatment grantees to implement a client sign-in process for all in-person client services.
 - Replace requirement for treatment providers to complete the client’s treatment plan from no later than the third encounter to no later than the fifth encounter.
 - Allow providers to take up to 60 days to process and act upon client’s request for written reports.

- Explore methods to expand treatment access, and for those enhancements determined feasible, include in the procurement process for SFY 2022 and 2023 service grants.
 - Promote the use of therapeutic justice with problem gambling criminal offenders by providing supports to Gambling Treatment Courts in Nevada and developing gambling treatment encounter codes that support services provided to courts and to court ordered gambling treatment clients.
 - Explore policies enabling and encouraging providers to braid funds from multiple funding streams, such as Medicaid, the Revolving Account for the Prevention and Treatment of Problem Gambling, charitable donations, and private insurance so that funds are combined, with careful accounting for how dollars from each funding source are spent.
 - Monitor encounter claim data and based on utilization, adjust allocations to gambling treatment grantees as indicated.
 - Annually conduct a review of the gambling treatment program standards and revise as needed.
 - Approximately every six months, based on encounter claims, adjust allocations to gambling treatment grantees.
 - Conduct a problem gambling treatment needs assessment. Utilizing data collected, develop a procurement strategy that will result in the purchasing of services for SFY 2022 and 2023 to meet identified needs and objectives.
- Each year assess strengths and gaps in the provision of these services and adjust as feasible.
- Utilize the ACPG to inform the development and implementation of innovative interventions targeting high risk populations/groups.
- Explore the development of a program designed to fill service gaps within the existing gambling treatment system.
- Develop a rural needs work group to inform program development designed to increase gambling treatment access to Nevada's rural communities.

E. Workforce Development

Goal:

Offer training, education programs, and networking opportunities designed to develop provider competencies and foster a supportive and collegial workforce made up of sufficient numbers.

Ongoing Delivery:

Continue to offer a workforce development grant to support an annual state conference on problem gambling and continually update the community with opportunities for problem gambling education. Continue to offer grantees the ability to utilize a portion of their grant monies to support the professional development of their problem gambling service staff including supervision services. Continue to integrate education and technical assistance into problem gambling treatment program reviews.

Enhancement Activities:

- Conduct a problem gambling workforce development needs assessment to analyze and recommend improvement strategies. Based on findings and available resources, implement problem gambling workforce enhancements. These enhancements may include:
 - Infuse topics on problem gambling into college course work / addiction study curricula.
 - Enhance the Center for the Application of Substance Abuse Technologies (CASAT) professional learning series to include a greater emphasis on education relevant to addressing problem gambling.
 - Develop and provide educational opportunities for qualified mental health professionals, as defined by NRS 458A.057, to meet the educational requirements to become back-up problem gambling counselors per Exhibit 2: Problem Gambling Treatment Provider Standards (10 hours of gambling specific education including at least 2 hours specific to gambling treatment).
 - Explore strategies to increase information exchanges between providers.
 - Identify core competencies for problem gambling counseling and strategies for developing core competencies among gambling counselors
 - Explore strategies to effectively and efficiently offer core problem gambling treatment counselor education for individuals seeking to become a CPGC-I.
 - Collaborate with professional credentialing/licensing bodies to explore adding a minimum number of problem gambling education hours for certification and licensing of behavioral health professionals.
 - Provide continuing education targeted to problem gambling treatment supervisors.
 - Develop workforce development liaison services: Between the Board of Examiners for Alcohol, Drug, and Gambling Counselors (BOE) and the community, including serving as certification liaison to the public; Between ACPG and CASAT and DHHS; Between ACPG and BOE.

- Develop a plan to address systemic issues with the Board of Examiners:
 - Get on the Board’s agenda to raise their awareness of the concerns of the ACPG;
 - Develop a plan or White Paper on issues that need to be addressed by BOE and include solutions;
 - Develop solutions to current barriers, for example use technology-based supervision where supervision can be provided offsite.
- Encourage problem gambling treatment grantees to offer internships to CPGC-I by increasing reimbursement rates for CPGC-Is.
- Devise training and education programs to develop provider competencies. Explore the following initiatives and implement if and when feasible:
 - Develop technical assistance services to offer support and training to new problem gambling treatment and prevention staff working within DHHS funded problem gambling treatment and prevention programs.
 - Establish standards for student placements and internships focused on developing competence in problem gambling prevention, early intervention and treatment services.
 - Utilize training models that emphasize coaching and on-site implementation support.
 - Offer regional problem gambling training opportunities.
- Expand efforts to educate the broader mental health and addictions community about problem gambling including links between problem gambling and other behavioral health issues, problem gambling treatment availability and evaluation outcomes, and problem gambling screening and referral. Explore the following strategies and implement if feasible:
 - Partner with colleges and institutions to offer specialty education and training in the knowledge, skills and attitudes essential to provide effective gambling disorder prevention and treatment services.
 - Expand web accessible resources for problem gambling service providers through the creation of a new provider specific website for problem gambling service providers.
 - Improve and make available continuing education events on a regular basis throughout the state that enhance the knowledge and skills of problem gambling service providers at all levels, including allied providers in the fields of behavioral health, physical health, and public health.
- Actively seek out and arrange for presentation opportunities at conferences within Nevada attended largely by health care service providers including behavioral health, physical health, and public health.
- Meet with behavioral health and education associations to explore where and how the topic of problem gambling can be incorporated into trainings, curricula, testing and certifications.

F. Research

Goal:

Advance the knowledge of the field of problem gambling with specific attention to using research data to drive Nevada's policies and practices relevant to DHHS problem gambling services.

Ongoing Delivery:

Continue to utilize third party evaluation of DHHS supported gambling treatment services including employing procedures to measure gambling treatment grantee performance on defined measures (See Appendix 2, Section II, Performance Measures). Continue to conduct follow-up evaluation interviews with consenting gambling treatment clients.

Enhancement Activities:

- Investigate gambling behaviors and problem gambling service awareness among adult Nevadans through adding gambling questions to the Behavioral Risk Factor Surveillance System (BRFSS) survey, analyzing results, and reporting on findings.
- Research pathways to long term recovery by enhancing the Problem Gambling Treatment Follow-up Evaluation Study to include in-depth interviews with consenting former DHHS supported gambling treatment clients and produce report that will include a discussion of findings can inform more treatment effectiveness.
- Stimulate problem gambling research in Nevada through the implementation of a problem gambling research grant program for Nevada researchers seeking seed grants and/or student research grants and/or other small grant programs.
- Utilizing data collected from the UNLV gambling treatment information management system, create Annual Gambling Treatment System Performance Reports for the purpose of utilizing the information to inform practice and policy by providing an analysis and review of the Intake, Discharge, and Follow-up evaluation for the fiscal year including trend analyses utilizing past year's data.
 - Produce both a detailed report and an abbreviated report designed for use with legislative committees and the public to provide an overview of the annual report findings inclusive of infographics and professional formatting.
- Create opportunities for Nevada based research on problem gambling to be disseminated at conferences, at trainings, among local media outlets, and to various problem gambling stakeholder groups within Nevada.



“It saved my life. I hope they never go away. I can't express enough that they honestly did save my life. They actually gave me courage and hope and I didn't have that before I went in there.”

— *Anonymous Client*

Quote taken from: Dassopoulos, A., St. John, S. & Bernhard, B. (2018). The Nevada Problem Gambling Study Annual Report. UNLV International Gaming Institute. Las Vegas, NV.

APPENDIX A

NEVADA DEPARTMENT OF HEALTH AND HUMAN SERVICES PROBLEM GAMBLING TREATMENT PROVIDER GUIDE

INTRODUCTION: This Agreement/Provider Guide (hereinafter referred to as “Agreement”) describes requirements that must be met by agencies and individual providers who wish to provide problem gambling treatment services funded by the Revolving Account for the Prevention and Treatment of Problem Gambling through NRS 463.320(2)(e). Providers must meet the requirements contained in this Agreement in order to receive funds for services provided under grant or agreement with the Nevada Department of Health and Human Service (DHHS).

I. Definitions

Throughout this Agreement, the following words and terms are used as defined in this section unless (a) the context in which they are used clearly requires a different meaning or (b) a different definition is prescribed for a particular part or portion of a part.

“**Abuse**” is defined as provider practices that are inconsistent with sound fiscal, business or medical practices, and result in an unnecessary harm or cost to DHHS or clients, or in reimbursement for services that are not medically necessary or fail to meet Agreement standards.

“**Aftercare**” shall mean the stage following discharge, when the client no longer requires services at the intensity required during primary treatment.

“**Board**” shall mean the Nevada State Board of Examiners for Alcohol, Drug, and Gambling Counselors.

“**Certified Problem Gambling Counselor**” or “**CPGC**” means a person who is certified as a problem gambling counselor pursuant to NRS 641C.050

“**Certified Problem Gambling Counselor Intern**” or “**CPGC-I**” means a person who is certified as a problem gambling counselor intern pursuant to the provisions of NRS 641C.060.

“**Certified Problem Gambling Counselor Fill-in**” or “**CPGC Fill-in**” means a person who is a qualified mental health professional, as defined by NRS 458A.057, who has completed at least 10 hours of gambling specific education within the past two years including at least 2 hours specific to gambling treatment and maintain documentation evidencing compliance with this education standard.

“**DHHS**” shall mean the Nevada Department of Health and Human Services, and its employees, agents and representatives. The Department of Public and Behavioral Health (BPBH) is a subdivision of DHHS assigned as the administrative branch of DHHS with

oversight of the problem gambling program and as such, within this document the acronyms BPBH and DHHS are used synonymously.

“**DPBH**” shall mean the Department of Public and Behavioral Health, and its employees, agents and representatives. DPBH is housed within DHHS and as such, the acronyms DPBH and DHHS are used synonymously.

“**Distance Treatment**” shall mean professionally delivered treatment where most of the time spent between a counselor and client are non-face-to-face encounters. The primary forms that distance treatment take is phone, web-based or video counseling.

“**Eligible Client**” or “**Client**” shall mean, for purposes of this Agreement, an individual with a gambling related problem is an individual with (a) a primary diagnosis of Gambling Disorder (DSM-5 code 312.31), (b) a primary diagnosis of sub-clinical Gambling Disorder (meets two to three DSM-5 diagnostic criteria for Gambling Disorder), or (c) a primary diagnosis of Relational Problem Related to Gambling Disorder (a variant of DSM-5 code V61.9).

“**Fraud**” is defined as an intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to him/herself or some other person. It includes any act that constitutes fraud under applicable federal or state laws.

"**May**" denotes the permissive.

“**Outpatient Gambling Treatment Program**” shall mean to provide problem gambling assessment, treatment and rehabilitation services delivered on an outpatient basis or intensive outpatient basis to individuals with gambling related problems who are not in need of 24-hour supervision for effective treatment. Outpatient Gambling Treatment Services must include regularly scheduled face-to-face or non-face to face therapeutic sessions or services in response to crisis for the individual and may include individual, group, couple, and family counseling.

“**Primary Diagnosis**” shall mean the main condition treated or investigated during the relevant episode of healthcare. The reason for admission in and of itself does not constitute the primary diagnosis. A primary diagnosis for Gambling Disorder, or other eligible client diagnoses, may only be made by CPGCs and mental health professionals qualified to make DSM-5 diagnoses as specified in their license or certification scope of practice.

“**Provider**” shall mean an institution, facility, program, agency, group or individual practitioner who has agreed to a written arrangement of cooperation with DHHS as an independent contractor or grantee to provide Problem Gambling Treatment Services. Provider is not an agent of DHHS and shall not represent itself as an agent of DHHS.

“**Psycho-educational Group**” shall mean a specific type of group therapy that focuses on educating clients about their disorders and developing competencies in members through such structured groups as social skills, coping skills, relapse prevention skills, and life skills training.

“**Residential Gambling Treatment Program**” shall mean to provide problem gambling assessment, treatment, rehabilitation and twenty-four-hour monitoring for pathological and

problem gamblers consistent with Level III of American Society of Addiction Medicine Patient Placement Criteria Second Edition Revised (ASAM PPC-2R). Residential Gambling Treatment Programs must be within a licensed inpatient mental health facility or residential alcohol and drug treatment facility that is in good standing and certified by a DHHS recognized accreditation board.

"**Shall**" denotes the imperative.

"**Self-refer**" shall mean a referral to a program without a prior assessment/treatment recommendation.

"**Service appointment**" shall mean a scheduled time for Client to meet with CPGC or CPGC-I for treatment session or assessment session.

"**Session**" or "**treatment session**" means services delivered in individual, couple, family, or group formats.

"**Treatment Episode**" shall mean the period beginning with the service date reported on the first encounter claim to the submission date of the discharge form.

II. Performance Standards

Providers funded through this Agreement must comply with the requirements set forth on Exhibits 1, 2, 3 and 4 attached hereto and incorporated herein by this reference.

Providers funded through this Agreement must meet the performance standards below. These performance standards are imposed and assessed on individual Providers and based on required data submitted by Providers to the UNLV International Gaming Institute, the current Information Management Contractor for DHHS gambling treatment services, and through program reviews and fiscal audits. If DPBH determines that a Provider funded through this Agreement fails to meet the specified performance standards, Provider will be required to submit a corrective action plan to DPBHS's satisfaction. Repeated inability to meet the performance standards below may result in discontinuation of grantee funding. Providers are also subject to requirements imposed by DPBH in other documents attached to the Notice of Grant Award.

Access: The amount of time between a problem gambling affected individual's request for outpatient services and the first offered service appointment must be five business days or less for at least 90% of all individuals receiving services funded through this Agreement.

Retention: The percent of problem gambling affected individuals receiving services funded through this Agreement who actively engage in problem gambling treatment for at least 10 clinical contact sessions must not be less than 50%.

Successful Completion: The percent of all individuals receiving services funded through this Agreement who successfully complete treatment must not be less than 50%. A successful problem gambling treatment completion is defined as the individual's: (a) achievement of at least 75% of short-term treatment goals, (b) completion of a continued wellness plan (i.e., relapse

prevention plan), and (c) lack of engagement in problem gambling behaviors for at least 30 days prior to discharge from services.

Client Satisfaction: The percent of problem gambling affected individuals receiving services funded through this Agreement who complete a problem gambling client satisfaction survey would positively recommend the Provider to others must not be less than 85%.

Long-term Outcome: The percent of problem gambling affected individuals receiving services funded through this Agreement who successfully complete treatment whose responses to a problem gambling follow-up survey suggest maintained improvement at twelve months after intake must not be less than 50%.

Consent for Follow-Up Evaluation: The percentage of problem gambling affected individuals receiving services funded through this Agreement at each clinic consenting for follow-up evaluation should be no less than 80% of the average percentage of clients consenting system wide.

Service Cost Share: The percentage of total reported services not claimed for DHHS reimbursement should be no less than 75% of the average percentage of total reported services not claimed for DPBH reimbursement across all DPBH treatment grantees.

Documentation Accuracy: A comparison of documented clinical services provided within client files and client sign-in sheets with encounters entered into the UNLV Problem Gambling Treatment Data Management System must have a correspondence rate of 95% or greater for any period of 28 consecutive calendar days or longer.

III. Special Reporting Requirements

Providers funded through this Agreement must submit the following information to Department (or to DHHS's designee), with respect to the individuals receiving services funded through this Agreement, as well as any other information related to the delivery of Services funded through this Agreement that DPBH reasonably requests from time to time:

- A. Intake Data: The data form must be collected and submitted within 14 days of the first face-to-face treatment contact with an individual.
- B. Client Consent Form: A completed client consent form for use in follow-up efforts must be collected and submitted as part of the Intake data. Client refusal to participate in the follow-up survey must be documented in the client file and when filling out the consent portion of the Intake form.
- C. Encounter Data: Encounter data for billing must be collected and submitted as described in Exhibit 3 attached hereto and incorporated herein by this reference. Prior to submitting an encounter claim each claimed encounter must be documented in the clinical record. Encounter claim documentation placed in the clinical record must include the date of the encounter service; the type of service delivered, the length of service, a clinical note describing data from the session, the clinician's signature and date the note was completed.

D. Discharge Data: Clients must be discharged 60 days after last date of service or after a change in level of service to or from residential treatment. The discharge must be documented in the client file, and discharge data must be collected and submitted within 30 days of discharge. Discharge data must be collected and submitted as described in Exhibit 3 attached hereto and incorporated herein by this reference. Prior to submitting discharge data, a treatment summary must be completed stating the reason for discharge, progress toward treatment plan objectives, and recommendations.

IV. Grant Award Calculation and Disbursement Procedures

A. Grant Award Calculation. DHHS grant awards are based on the following services and claim rates:

Services and Rates*

Types of Providers	Assessment \ Diagnostic Workups	PRIMARY TREATMENT				
		Individual Session	Family Session	Psychotherapy Group Session	Psycho-educational Group Session	Residential Bed-day
CPGC	\$100/hr	\$88/hr	\$100/hr	\$28/hr	\$22/hr	\$150
CPGC-I	\$75/hr	\$66/hr	\$75/hr	\$21/hr	\$16.5/hr	\$150

**See Exhibit 4 for service and unit definitions.*

The above services and rates are subject to the following:

1. These rates are based on maximum allowable claims for the DPBH Bureau of Behavioral Health Wellness and Prevention Gambling Treatment Program, applicable only to granted DPBH Problem Gambling Treatment vendors.
2. Rates are on an hourly per person basis except for residential bed-day where 1 unit is an overnight stay.
3. Psychotherapy Group size is not to exceed 12 participants.
4. Rates for individual sessions and family sessions are based on **time** per session not the number of persons attending. Time is claimed for each 15-minute unit rounded to the nearest 15-minute unit increment. Services lasting less than seven and one-half minutes are not eligible to be claimed.
5. Individual and family/couple sessions lasting 50 minutes or more may include up to 10 minutes for progress note writing (e.g., 50-minute session may be billed for 1 hour).

When encountering for group therapy, the only allowable time is that spent with clients (e.g., time writing progress notes and time provided for group breaks are not to be counted when submitting service claims).

6. Residential Treatment Assessments / Diagnostic Workups must include the administration of the Gambling Patient Placement Criteria (GPPC) instrument. Outpatient Treatment Assessment / Diagnostic Workups must include the administration of the GPPC or other DHHS approved assessment tool(s) and protocol.
7. Only one assessment claim per client is allowable except in situations where a client was discharged then later re-enrolled.
8. If the person enters treatment, reimbursement eligibility begins after successful submission of client enrollment information to DHHS designated information management entity.
9. Persons enrolled into residential treatment services are not eligible to receive DHHS supported outpatient gambling treatment until they are discharged from residential treatment.
10. If provider does an assessment/diagnostic workup and the client enters treatment, those costs shall not be considered part of the maximum allowed reimbursement per treatment episode.
11. The maximum allowed reimbursement per treatment episode shall be \$3,000 for outpatient treatment, and \$4,000 for residential treatment.
12. No state reimbursement payment will be made for a missed scheduled session. All services reimbursed by BHWP must be documented in the client chart.
13. The rate to be billed must be based on the educational and training level of the direct provider, not of the person supervising the provider.
14. Persons eligible to enroll into DHHS reimbursed gambling treatment must have a gambling related problem as defined by (a) a primary diagnosis of Gambling Disorder (DSM-5 code 312.31), (b) a primary diagnosis or sub-clinical Gambling Disorder (meets two to three DSM-5 diagnostic criteria for Gambling Disorder), or (c) a primary diagnosis of Relational Problem Related to Gambling Disorder (a variant of DSM-5 code V61.9).
15. Persons eligible to enroll into DHHS reimbursed residential gambling treatment must have special needs as defined by all of the following: (a) a primary diagnosis of Gambling Disorder (DSM-5 code 312.31); (b) referral from a certified problem gambling counselor or inpatient psychiatric facility; (c) must meet residential gambling treatment program admission criteria as defined in Exhibit 1.

16. Services that receive reimbursement must be face-to-face therapeutic sessions unless a specific distance treatment plan is documented in the client record and conforms to DHHS conditions to provide distance treatment.
 17. Providers of services funded through this Agreement may charge client co-pays with the following limitations: (a) The maximum client co-pay in a residential program is \$10.00 per bed day; (b) The maximum client co-pay for client's meeting medically necessary treatment in an outpatient program is \$10.00 per session; (c) The client co-pay for a court ordered treatment client that does not meet gambling treatment medical necessity may equal 50% of the Nevada DHHS Problem Gambling Services Procedure Codes and Reimbursement Rates as provided in Exhibit 4. No client shall be refused services due to inability to pay.
 18. Total DPBH payment for all services delivered under this Agreement shall not exceed the total funds awarded for services as specified in the Notice of Grant Award.
 19. DPBH is not obligated to provide payment for any Services that are not properly reported or documented as described or referenced in this Agreement by the date 45 days after the termination of this Agreement.
 20. DPBH may reduce or increase the amount of funds awarded based on one or a combination of factors including the underutilization or overutilization of the current grant budget, the efficiency of funds used as determined by average cost-per-treatment episode and performance in meeting standards as defined above in Section II, changes in grantee program capacity, changes in available funds from the DPBH Revolving Account for the Prevention and Treatment of Problem Gambling, and/or discovery of grantee being out of compliance with grant conditions. Provider shall execute and deliver to DPBH an appropriate amendment, as written by DPBH, to reflect budget change. In addition to the six-month utilization review and allocation adjustment, additional funding adjustments may be made at the request of the provider or DPBH.
 21. Service procedure codes, procedure definitions, and corresponding reimbursement rates are provided on Exhibit 4. Reimbursement for "add on" procedure code claims (T1016, T1013, 50A, 50B, 50C, 60A, 60B, MAT, WFD, TRA) are limited to 10% of a gambling treatment grantee's total grant amount. "Add-on" codes percent limitation to grantee's total grant amount subject to change during the grant period.
 22. Providers offering virtual services must follow the Nevada Telehealth Counseling Policy Statement/Guidelines found in Exhibit 6. Virtual check-ins or other services with clients may be claimed for reimbursement only if they are client-initiated or scheduled in advance with the client and exceed seven minutes and thirty seconds (the minimum amount of direct service time expended to claim one 15 minute service unit).
- B. Provider Audits. Providers and sub-contracted Providers receiving payments from DPBH are subject to fiscal review and/or audit for all payments applicable to services rendered. DPBH may require Providers to payback funds for services paid for and not appropriately documented or for services claimed that are not allowable or claimed incorrectly. Refer to Grant Instructions and Requirements for further details.

C. Prior Authorization and Exception Requests. DPBH may grant the following exceptions with prior authorization.

1. Treatment providers may request up to 5% of the grant award, for the current grant cycle, to be used for extensions of client benefit caps. The actual amount expended on behalf of each client (rather than the requested amount) will apply toward the overall 5% extension limit.
2. Other exceptions to conditions or clauses of Agreement, as mutually agreed upon in writing by DPBH and Provider.

D. Procedure for requesting prior authorization and exception requests.

1. Requests for prior authorization and exceptions must be made no less than seven (7) days prior to the first day the exception is requested to go into effect. For benefit extension requests submitted within seven day of the exception commencement date, no guarantee is provided the extension request will be granted and therefore any services rendered prior to DPBH approval is subject to being denied for reimbursement.
2. For submitting benefit extension requests, providers must complete the most recent version of the “Nevada Department of Health and Human Services Problem Gambling Treatment Benefit Extension Request Form” in its entirety (Exhibit 5) then email the DHHS Problem Gambling Program Coordinator, a scanned copy of PART B & C or within body of email include all information from PART B & C along with a statement that a completed Benefit Extension Request Form has been placed in the client’s file.
3. The procedure for requesting exceptions to conditions or clauses of Agreement, other than benefit extension requests, consist of emailing the DPBH Problem Gambling Program Coordinator the exception request along with an explanation of why the request is needed.
4. In situations where a program’s CPGC or CPGC-I are temporarily unavailable due to vacancies of 30 or less days, vacation time, sick leave, or job related travel, then other qualified mental health professionals (QMHP), as defined by NRS 458A.057 may provide gambling treatment services if they had completed at least 10 hours of gambling specific education within the past two years including at least 2 hours specific to gambling treatment. Submission of an exception request to enact this provision is required and must include the name of the QMHP, documentation that the education requirements have been met, and description of the intended use and duration of QMHP gambling treatment services.

Exhibit 1

Residential Gambling Treatment Admission Criteria

The following criteria shall be met before an individual is admitted to the residential care program.

- A. Primary DSM-5 diagnosis by a qualified care provider as a disordered gambler; and
- B. At time of admission, manifestation of at least one the following liabilities, as documented and supported by client responses to the Gambling Patient Placement Criteria (GPPC):
 - 1. Severe Gambling Disorder symptom intensity to the extent symptom control can only be expected within a structured residential setting;
 - 2. Depression and/or other emotional behavioral symptoms are sufficiently interfering with recovery efforts requiring residential care including endangerment to self or others; inability to function outside a controlled environment;
 - 3. Even though faced with serious consequences, the individual does not accept them and requires intensive motivational strategies and efforts only available in a structured residential setting;
 - 4. Failed attempts to achieve abstinence from gambling through formalized outpatient treatment or other residential treatment episodes;
 - 5. Living in an environment where efforts to obtain even short-term abstinence in outpatient treatment are, or likely to be, thwarted, or living in a location where outpatient treatment is not available on a regular basis.

CONTRAINDICATIONS

- A. Individual is physically, mentally, or behaviorally inappropriate for a residential setting and requires supervised medical attention, potential seclusion, or restraint.
 - B. Individual has a moderate to severe substance use disorder that is not in remission (less than 1 month of cessation of dependence)
-

Exhibit 2

Gambling Treatment Provider Standards

Providers of Services funded through this Agreement must comply with the conditions stated in the main body of this document and the standards set forth below. These standards were developed based on principles where (a) the safety and dignity of problem gambling treatment individuals should always be maintained and (b) treatment services should be designed to enhance the strengths of each client.

I. Accessibility – Providers of problem gambling treatment shall:

- A. Deliver treatment at a physical location that conforms to the requirements of the Americans with Disabilities Act (ADA), to the extent reasonably practical.
- B. The hours of operation and service availability shall reflect the needs of the clients served.
 1. A client with emergency needs shall have immediate access to a clinician or a referral to emergency services.
 2. Individuals not yet enrolled into service and requesting an appointment should be seen within twenty-four (24) hours, to the extent reasonably practical.
 3. Make treatment available during both daytime and evening hours, to the extent reasonably practicable.
 4. A client requesting services shall be seen for a routine office visit within ten (10) business days.
- C. Develop and implement a policy of delivering treatment in a non-discriminatory and culturally sensitive manner. Recognize and respond appropriately to the unique needs of special populations (e.g., language, illiteracy, disability, culture, race, gender, sexual orientation, age-related differences, etc.) which could include but is not limited to: Making reasonable modifications in policies, practices, and procedures to avoid discrimination (unless the program can demonstrate that doing so would fundamentally alter the nature of the service, program, or activity) such as:
 1. Providing individuals capable of assisting the program in minimizing barriers (such as interpreters);
 2. Translation of written materials to appropriate language or method of communication;
 3. To the degree possible, providing assistive devices which minimize the impact of the barrier and;
 4. To the degree possible, acknowledge cultural and other values which are important to the client including supporting the use of traditional healers and traditional healing methods, when advocated by the client and appropriate.

- D. No person should be denied services or be discriminated against on the basis of age or diagnostic or disability category unless predetermined clinical or program criteria for service restrict the service to specific age or diagnostic groups or disability category. The provider should have written criteria for accepting or refusing admission requests, including steps for making referrals for individuals not admitted to the program. For those clients refused admission based on assessment, the provider should document the reasons for refusal and subsequent referrals within seven days following the refusal decision.
- E. In the treatment of clients under the age of fourteen the service plan must conform to State laws.
- F. With Department written approval of provider protocols, providers may offer treatment services at remote sites and through distant treatment protocols (e-therapy, telehealth, etc.) to increase treatment access. Protocols for providing treatment at remote locations or through distance treatment must include:
 - (a) The ethical standards to be applied for licensed and certified counselors and certified interns;
 - (b) Practices and procedures to address the safety of clients and service providers;
 - (c) Uniform service protocols to ensure Gambling Treatment Provider Standards are met, including client privacy standards; and
 - (d) Standards concerning the electronic supervision of interns working at remote sites, if applicable.

See Exhibit 6 for an expanded description of telehealth standards and resources.

- II. Eligibility – Persons acceptable to receive problem gambling treatment services funded by the Revolving Account for the Prevention and Treatment of Problem Gambling through NRS 463.320(2)(e) shall:
 - A. Demonstrate residency within the State of Nevada, AND either
 - B. Present with a primary diagnosis of Gambling Disorder or sub-clinical Gambling Disorder, OR
 - C. Be a family member or significant other that is impacted by another’s gambling behavior (even if the gambler does not seek counseling).
- III. Eligible Providers – Persons administering gambling treatment clinical services, reimbursed through funds from by the Revolving Account for the Prevention and Treatment of Problem Gambling through NRS 463.320(2)(e), shall hold current certification, in good standing, as a Certified Problem Gambling Counselor (CPGC) pursuant to NRS 641C or Certified Problem Gambling Counselor Intern (CPGC-I) pursuant to the provisions of NRS 641C. Providers must be in compliance with Alcohol, Drug, and Gambling Counselor Standards of Practice as defined in NRS 641.C.

- A. CLINICAL SUPERVISION: Problem gambling treatment providers who are not trained to diagnose or treat mental illness other than substance use disorders and gambling disorders, as determined by the scope of practice provided by their professional license, are required to make provisions for a minimum of two (2) hours per month of clinical supervision or consultation by a clinical supervisor with at least two years of postgraduate experience providing mental health services to adults. Supervisory staff who oversee the treatment of individuals with diagnoses other than substance use disorders and gambling disorders shall hold a license allowing them to diagnosis and treat a range of mental health disorders. Supervisors shall complete at least 10 hours of gambling specific education within the past two years including 2 hours on supervising gambling treatment counselors and maintain documentation evidencing each supervisor’s compliance with this education standard.

Certified Problem Gambling Counselor Interns (CPGC-I) are required to make provisions for a minimum of two (2) hours per month of clinical supervision by a CPGC that is Board approved to supervise certified problem gambling interns. Clinical documentation written by CPGC-I must be reviewed by supervisors and must be co-signed by the clinical supervisor of the CPGC-I.

- B. COMPETENCY: Providers shall refer individuals to other professionals if an individual’s clinical presentation is beyond the scope of the Provider staff’s competency as determined by their certification restrictions, or license restrictions, or supervisor evaluation, or self-evaluation.
- C. AVAILABILITY: Persons administering gambling treatment clinical services have an obligation to their clients to provide services to their client on a schedule therapeutically appropriate to their needs or refer the client to services matched to their needs. In situations where a program’s CPGC or CPGC-I are temporarily unavailable due to vacancies of 30 or less days, vacation time, sick leave, or job related travel, then other qualified mental health professionals, as defined by NRS 458A.057 may provide gambling treatment services if they had completed at least 10 hours of gambling specific education within the past two years including at least 2 hours specific to gambling treatment and maintain documentation evidencing compliance with this education standard (CPGC Fill-in).

IV. Accountability – Providers shall deliver the services in accordance with the following standards:

- A. GUIDELINES FOR TREATMENT SERVICES – Providers shall provide a variety of diagnostic and treatment service alternatives to each individual receiving problem gambling treatment. Treatment plans or care plans shall be designed to meet the individual’s needs and resources as identified in the comprehensive assessment. Providers shall offer, at minimum, the following types of problem gambling treatment services:

1. Assessment – The assessment involves a face-to-face interview with the individual completed within the fifth client contact following enrollment into the treatment program. The purpose of the interview is to collect and assess pertinent information regarding the individual’s past history and current situation that results in a clinical diagnosis and a recommendation regarding the need for treatment. The Provider shall have the ability to perform a structured interview process to assess the existence of problem gambling and co-existence with other disorders including, but not limited to, substance abuse, mental disorders, and significant health problems. Suicide potential and potential to harm others must be assessed and clinical records must contain follow-up actions and/or referrals when a client reports symptom indicating risk of harm to self or others.

2. Orientation: The provider shall give to the client, document the receipt of by the client, and make available to others, written program orientation information which includes:
 - a) The program or provider’s philosophical approach to treatment;
 - b) A description of treatment services;
 - c) Information on client’s rights and responsibilities, including confidentiality, while receiving services and following discharge.
 - d) Information on the rules governing client’s behavior and those infractions that may result in discharge or other actions. At a minimum, the rules shall state the consequence of substance use and gambling while in treatment, absences from appointments and failure to participate in the planned treatment activities; and
 - e) Information on emergency services.

3. Individual, Family, and Group Treatment – Treatment sessions must address the problems of the individual(s) as they relate, directly or indirectly, to the problem gambling behavior.
 - a) **CRISIS INTERVENTION** – Providers shall accommodate after-hour crisis intervention as necessary. This may be accomplished through agreement with other crisis services or on-call staff.
 - b) **FAMILY & COUPLES COUNSELING** – To the extent reasonably practicable, providers should make efforts to accommodate the therapeutic needs of family members, partners, and concerned others of problem gamblers. This may be accomplished, in part, by forming working relationships with other problem gambling counselors and referring to colleagues the partner and/or family members of a problem gambler when either such requests are made or it is in the best interest of the gambler and family member(s) to work with different counselors.

- c) **DISCHARGE PLANNING** – A recovery/wellness plan or relapse prevention plan shall be developed by the Provider in collaboration with the individual and placed in the individual’s file. A wellness plan shall be initiated early in treatment and finalized prior to discharge. The client’s signature and date is proof of participation in the discharge planning. If the client was not involved in discharge planning, the file must show documentation that the client was notified of file closure. The discharge plan/relapse plan must document the therapeutic closure of formal treatment for the identified individual as well as recommendations and community resources for ongoing recovery.
4. Continuity of Care (community resources) – Providers shall have the capacity to coordinate services and make appropriate referrals to other formal and informal service systems, such as: mental health, Gamblers Anonymous, Gam-Anon, financial consultants, legal advice, medical, crisis management, cultural issues, housing, vocational, etc. The referral and follow-up action need to be documented in the client’s file.

B. DOCUMENTATION

Providers shall create and maintain the following documentation with respect to each individual receiving problem gambling treatment.

1. **Enrollment:** Identifying and demographic information for the individual including, at a minimum: Client ID, name, address, date of birth, gender, marital status, and emergency contact. Any additional identifying and demographic data reasonably required by funding body.
2. **Assessment:** Intake assessment documentation for the individual, including all of the following.
 - Referral source.
 - Presenting problem.
 - Gambling history.
 - Current financial status assessment.
 - History of substance use and substance use disorders, including past treatment episodes, assessment of risk of possible withdrawal, and history of other behavioral addictions.
 - Health status (e.g., last physical, diet, exercise), current medical problems including medication use.
 - Mental health history and current mental health status (e.g., treatment history, psychiatric medications).
 - Profile of family of origin and marital/relationship history which describes family composition and dynamics.
 - Recovery environment.

- Strength and recovery assets.
- Education and vocational history.
- Legal history (including arrest and conviction history).
- Risk of harm to self or others (e.g., assess for suicide risk, intimate partner violence, child neglect and abuse, elder abuse).

The information gathered shall include an intake assessment summary containing a DSM 5 diagnosis with supporting documentation, level of risk of harm to self or others, financial risk, recommendations for the type and intensity of treatment and any referrals given to another treatment provider.

3. Treatment plan / service plan / care plan: An individualized treatment plan / service plan / care plan shall be developed in accordance with general professional standards for either substance abuse or mental health outpatient services. The treatment plan shall be completed within 30 days of intake or the fifth session following the commencement of treatment to the individual. The treatment plan shall adhere to the following standards.
 - a) Address client-centered issues identified from the assessment and modified as appropriate.
 - b) Be written with clear and measurable objectives that are consistent with the client's abilities and strengths and that the individual agrees to as the foundation of treatment.
 - c) Include an adequate range of services.
 - d) Include a plan to address financial issues, if applicable.
 - e) Include regularly scheduled sessions.
 - f) Document that participation of the family members was encouraged.
 - g) Reflect the theoretical treatment approach taken by the program in clinical sessions.

The treatment plan / care plan shall be reviewed and modified continuously as needed and as clinically appropriate, and documentation of a treatment plan review shall be no less frequent than once every 90 days.

The individual's signature and signature date will signify participation in the development and review of the plan. The plan shall also be signed and dated by the clinician.

4. Progress notes: The individual's progress and current status in meeting the goals set in the treatment plan shall be documented within 96 hours of all clinical contacts. All progress notes shall include service date, indicate type and length of service,

contain data from the session, clinical assessment, a clinical plan, and be signed by the person providing the service, and dated for when the documentation was written. Within a residential treatment setting, the use of weekly summary notes is sufficient to document clients' progress.

5. Rights, responsibility, and informed choice. The following shall be documented in the client file (as applicable).
 - Documentation that the individual has been informed of client rights and responsibilities, including the Health Insurance Portability and Accountability Act (HIPAA) privacy rule and other confidentiality protections and exceptions.
 - Information release forms signed and dated with client and clinician's signatures.
 - Consent to treat form signed by the individual (see Section VIII).
 6. Reports, correspondence, post-intake assessments. The following additional information shall be documented in the client file (as applicable).
 - Results of all examinations, tests, and assessment information.
 - Reports from referring sources.
 - Correspondence related to the individual, including letters and dated notations of telephone conversations relevant to the individual's treatment.
 7. Treatment summary: Within 30 days of the client leaving treatment, a treatment summary shall be completed stating the reason for discharge, progress toward treatment plan objectives, and recommendations.
 8. Treatment dropouts: Clients not provided services for 60 continuous days should be notified by letter of their case file closure and invited back to treatment if appropriate. A treatment summary should be completed within 90 days of last service.
 9. Verification of service: Providers of residential gambling treatment services must document each per-diem treatment claim by asking clients to sign and date a residential gambling treatment log. Providers of outpatient gambling treatment services must document each in-person encounter by asking clients to sign, date, and indicate appointment time on an attendance log in a manner protecting the confidentiality of other clients.
- V. Financial - Providers of problem gambling treatment should implement a structured process for assessing client financial circumstances and needs of the individual. Treatment strategies should be developed to address the individual's financial circumstances and needs that may include but are not limited to the following.

- Developing a financial management plan for the individual that includes a restitution plan, if appropriate.
 - Connection with relevant financial assistance services.
 - Development of a plan with the individual to cope and manage with loan/debt collectors, if appropriate.
- VI. Effectiveness – Providers should use appropriate treatment techniques and be able to document the effectiveness of treatment using measurable criteria.
- A. Providers shall have a system for measurement of progress and outcomes as stated in treatment objectives on the treatment plan.
- B. Providers shall clearly define the process for internal program review and self-correction (e.g., Continuous Quality Improvement Protocols). A program shall develop and implement written policies and procedures that describe program operations. Policies and procedures shall include a records retention policy per GIR-16-20, quality assurance plan for ensuring that clients receive appropriate treatment services and that the program is in compliance with relevant administrative rules, and other reporting requirements.
- C. If two or more staff provides services, the program shall have and implement the following written personnel policies and procedures, which are applicable to program staff and interns/students.
1. Rules of conduct and standards for ethical practices of treatment program practitioners.
 2. Standards for use and abuse of alcohol and other drugs with procedures for managing incidents of use and abuse that, at a minimum, comply with Drug Free Workplace Standards.
 3. Compliance with regulations related to employment practices.
- D. Providers shall implement a written treatment approach that is defined and supported in current literature.
- VII. Efficiency – Providers shall provide services in the least restrictive setting and in the most cost-effective manner based on the individual’s needs, resources, and strengths as determined by the problem gambling assessment.
- VIII. Client Protections and Rights – Providers shall:
- A. Maintain the confidentiality of all client records in accordance with the Health Insurance Portability and Accountability Act (HIPAA) and other applicable laws and regulations.
- B. Develop and implement policies and procedures to safeguard and protect the case record of individuals against loss, tampering, or unauthorized disclosure of information.

Maintenance of such records shall include adequate physical facilities for the storage, processing, and handling of the records. These facilities shall include suitably locked, secured rooms for file cabinets.

- C. Retain the records of individuals as specified under HIPAA.
- D. The client shall have the right of access to records. Access includes the right to obtain a copy of the record within 60 days of requesting it and making payment for the cost of duplication. The client shall have the right of access to the client's own records except:
 - 1. When the clinical supervisor determines that disclosure of records would be detrimental to the client's treatment; or
 - 2. If confidential information has been provided to the program on the basis that the information is not re-disclosed or may be obtained directly from originating source.
- E. Require each individual to sign consent to treatment statements which includes conditions under which confidentiality can (or must) be broken.
- F. Document and inform each individual of the individual's rights and responsibilities in treatment. Each client shall be assured the same civil and human rights as other persons. Each program or private-practice provider shall develop and implement and inform clients of written policies and procedures which protect clients' rights including:
 - 1. Protecting client privacy and dignity;
 - 2. Prohibiting physical punishment or physical abuse;
 - 3. Protecting clients from sexual abuse or sexual contact and
 - 4. Providing adequate treatment or care.
- D. Documentation must include a formal grievance procedure with provision for appeals. The program or private practice provider shall develop, implement, and fully inform clients of policies and procedures regarding grievances that provide for:
 - 1. Receipt of written grievances from clients or persons acting on their behalf;
 - 2. Investigation of the facts supporting or disproving the written grievance;
 - 3. Initiating action on substantiated grievances within five working days, and
 - 4. Documentation in the client's record of the receipt, investigation, and any action taken regarding the written grievance.
- E. The client shall have the right to refuse service, including any specific procedure. If consequences may result from refusing the service, those consequences must be explained verbally and in writing to the client.

Exhibit 3

Encounter Data Reporting Requirements

INTRODUCTION:

In order to efficiently implement the disbursement of financial assistance, it is necessary for all Providers of Services funded through this Agreement to submit individual-level service delivery activity (encounter data) each month.

OVERVIEW:

The data collection process is intended to create as minimal a burden on Providers as possible, while creating a sound documentation trail for necessary fiscal auditing that will occur at least once each year for all Providers. The system is designed to provide optimal flexibility for Providers to facilitate minimum changes to local procedures. All Providers will be required to comply with DHHS procedures for HIPAA compliance.

At the time the Treatment Strategic Plan was implemented (August 2019), the UNLV International Gaming Institute was the DHHS designee to manage the encounter data collection process. Should a different entity be designated in the future, DHHS will amend the Treatment Strategic Plan and communicate the change to Providers.

The UNLV International Gaming Institute has created an online data management system, to submit intake, encounter, program and treatment support activity, and discharge data electronically, for use by all Providers. All staff who do data entry or quality assurance activities are provided individualized log-in names and passwords by UNLV International Gaming Institute. This secure log-in information allows data entry and viewing of data already entered in the data management system for their specific clinic/organization. Providers must complete monthly data entry to complete monthly reporting to and billing of DPBH for services provided, and for use in the UNLV Nevada Problem Gambling Study.

Client eligibility data is required to be submitted online via the UNLV International Gaming Institute web site (<https://www.nvpgdata.com>) prior to the authorization of reimbursement for encounter claims. This eligibility data will consist of the current intake/enrollment online forms as promulgated in the gambling program evaluation data collection protocol.

Required Encounter Data:

The following fields must be collected, with respect to each individual receiving Services funded through this Agreement, for the grants management disbursement system:

Individual Identification Code: Local code utilized to identify individuals for the Provider evaluation effort. The client identification code (called the “client id”) consists of the month and day of the client’s birthdate, the last 5 digits of the client’s social security number and ends with the number “1” for a final format of MMDDsocsc1. If two clients have the same month and day

of birth, and same last 5 digits of their social security numbers, UNLV International Gaming Institute will alter one client's identification number to end in a "2" to distinguish between the two clients.

Treatment Type: Type of service provided during session with client. Appropriate HIPAA compliant codes for eligible services must be used. See Exhibit 4.

Date of Service: Date the service was provided in American format - MMDDYYYY.

Counselor: The identification of the counselor, or therapist, conducting the session. This is a discrete identification that can be utilized during audits to enable verification of services performed from the clinical charting. The treating professional identification must be included in the appropriate field, in the format of first initial and last name, ex. JDoe.

Intern: The identification of the Certified Problem Gambling Counselor – Intern conducting the session. This is a discrete identification that can be utilized during audits to enable verification of services performed from the clinical charting. The treating professional identification must be included in the appropriate field, in the format of first initial and last name, ex. JDoe.

Units of Service: Service units are reported in a manner that is consistent with current DHHS standards, with 1 unit = 15 minutes of service or 1 unit = a daily rate for certain reimbursement codes.

Other Payments: This field is used to report any amount clinics were reimbursed from any other parties for providing this service, including insurance carriers and the clients themselves, but not including the co-pay amount collected from clients at each session (typically \$10).

Operational Reporting Schedule:

1. Encounter data must be submitted online via the UNLV International Gaming Institute web site (<https://www.nvpgdata.com>), until or unless notified otherwise by DHHS.
2. Encounter data for the previous month must be entered on the UNLV International Gaming Institute web site no later than 5 p.m. on the 5th day after the period being reported (e.g., July 2020 encounter data is due on August 5, 2020).
3. The UNLV International Gaming Institute will assemble data and prepare draft summary reports for submission to individual treatment Providers by the 10th of each month. The reports will include (at minimum) the type of service and total number of units of service claimed for each date of service, for each client receiving services from the Provider during the billing period.
4. Each Provider is required to respond to the draft summary report via an e-mail to the UNLV International Gaming Institute.
 - a. The Provider must either:
 - (1) Verify that the summary report is an accurate record of services provided, or

- (2) Report discrepancies, including apparent cause and remedy.
 - b. The timeframe for response is within 3 days from notification.
5. The UNLV International Gaming Institute will work with Providers to resolve any discrepancies and submit a final summary report and Request for Reimbursement (RFR) to individual treatment Providers for signature within 3 days of notification of the discrepancies.
 6. Each Provider will return a signed Reimbursement (RFR) in .pdf format to the UNLV International Gaming Institute.
 7. The UNLV International Gaming Institute will submit the final summary report and a signed Reimbursement (RFR) to DPBH for each individual Provider by the 20th of each month.
 8. DPBH will reimburse Providers within 30 days following receipt of the final summary report from the UNLV International Gaming Institute. Any additional discrepancies that are identified after payment is made will be addressed as adjustments (credits or debits) on the next payment processed. After July 15th, no further adjustments may be made for service claims for the preceding grant year (July 1st through June 30th).
 9. Encounter data for July 1 through December 31 of each grant year may be used to determine mid-year grant award adjustments. If such adjustments are made, they will likely occur 45 days after the closing of the mid-year utilization period to allow any discrepancies identified for December to be resolved and to allow sufficient time for DPBH to evaluate the encounter data and prepare the necessary paperwork to execute grant amendments.
 10. In even-numbered years when grants are renewed, encounter data for July 1 through April will be used to determine initial grant awards for the following grant year.
 11. In odd-numbered years when a competitive grant process is conducted, encounter data from the preceding grant year may be used to help determine grant awards for any repeat grantees.
 12. Required Discharge Data. Clients must be discharged either:
 - a. 60 days after last date of service, or
 - b. Following a change in the level of care the client is receiving (e.g. when a client completes residential treatment, then starts outpatient treatment at the same or a different clinic).

Client discharges must be documented in the client file, and discharge data must be collected and submitted online within 30 days of discharge via the UNLV International Gaming Institute web site (<https://www.nvpgdata.com>). Discharge data includes: client id, date of discharge, and a discharge code selected from the online discharge form specifying the reason the client was discharged.

Exhibit 4

Nevada DHHS Problem Gambling Services Procedure Codes and Reimbursement Rates *v11.5.19*

Code	Description	Upper Payment Amount*	Service Criteria
H0004	Gambling Treatment counseling and therapy, per 15 min	\$22.00	Service provided by a CPGC or CPGC Fill-in. The treatment of a gambling disorder by psychological means.
H0004i	Gambling Treatment counseling and therapy, per 15 min	\$16.50	Service provided by a CPGC-I. The treatment of a gambling disorder by psychological means.
H0005	Gambling Treatment counseling, group per 15 min	\$7.00	Service provided by a CPGC or CPGC Fill-in. The practitioner seeks to help individual group members to understand and remediate their significant emotional and psychological problems, focusing on intrapersonal and interpersonal dynamics. Maximum group size of 12 clients.
H0005i	Gambling Treatment counseling, group per 15 min	\$5.25	Service provided by a CPGC-I. The practitioner seeks to help individual group members to understand and remediate their significant emotional and psychological problems, focusing on intrapersonal and interpersonal dynamics. Maximum group size of 12 clients.
90846	Concerned Other counseling and therapy (concerned other without the gambler present), per 15 min.	\$22.00	Service provided by CPGC, CPGC Fill-in, LMP, LPC, LMFT, LCSW, Psychologist, or QMHP. The treatment of a primary diagnosis of Relational Problem Related to Gambling Disorder (a variant of DSM-5 code V61.9).
90846i	Concerned Other counseling and therapy (concerned other without the gambler present), per 15 min.	\$16.50	Service provided by a CPGC-I. The treatment of a primary diagnosis of Relational Problem Related to Gambling Disorder (a variant of DSM-5 code V61.9).
90847	Couples and Family Psychotherapy (conjoint psychotherapy) were the gambler present, per 15 min.	\$25.00	Service provided by CPGC, CPGC Fill-in, LMP, LPC, LMFT, LCSW, Psychologist, or QMHP. Family psychotherapy is covered when there is a need to observe the client's interaction with family members and/or where there is a need to assess the capabilities of and assist the family members in aiding in the management of the client. Individual and family therapy codes can be encountered on the same date of service if there are two separate counseling sessions- one with the client and one with the family member and patient present.

90847i	Couples and Family Psychotherapy (conjoint psychotherapy) were the gambler present, per 15 min.	\$18.75	Service provided by a CPGC-I. Family psychotherapy is covered when there is a need to observe the client's interaction with family members and/or where there is a need to assess the capabilities of and assist the family members in aiding in the management of the client. Individual and family therapy codes can be encountered on the same date of service if there are two separate counseling sessions- one with the client and one with the family member and patient present.
G2013	Residential gambling treatment service, per diem	\$150	Services provided within a licensed inpatient mental health facility or residential alcohol and drug treatment facility designated as a residential gambling treatment program and intensively staffed 24-hour for which treatment includes an appropriate mix and intensity of assessment, medication management, individual and group therapies and skills development to reduce or eliminate the acute symptoms of the disorder and restore the client's ability to function in a home or the community to the best possible level. A claim for residential gambling treatment services can only be made for those days where the client is occupying a bed during sleeping hours or a client has been provided a therapeutic pass for up to 48 hours. With pre-authorization, exceptions to the 48 hour rule may be made with reasonable justification.
G2100	Problem Gambling Psychoeducational Group Services, per 15 min for gambler and/or family member	\$5.50	Service provided by a CPGC. Service to clients with a specific type of group therapy that focuses on educating clients about their disorders and ways of coping.
G2100i	Problem Gambling Psychoeducational Group Services, per 15 min for gambler and/or family member	\$4.13	Service provided by a CPGC-I. Service to clients with a specific type of group therapy that focuses on educating clients about their disorders and ways of coping.
G2200	Intake Assessment, per 15 minutes (12 unit claim maximum; allowable per administration and documentation of intake assessment)	\$25.00	Service provided by a CPGC or CPGC Fill-in. Biopsychosocial clinical assessment containing a DSM 5 diagnosis with supporting documentation, level of risk of harm to self or others, financial risk, recommendations for the type and intensity of treatment and any referrals given to another treatment provider. Eligibility based on Provider's reasonable cause to believe the person requesting the intake assessment may be eligible for DHHS-funded gambling treatment services.
G2200i	Intake Assessment per 15 minutes (12 unit claim maximum; allowable per administration and documentation of intake assessment)	\$18.75	Service provided by a CPGC-I. Biopsychosocial clinical assessment containing a DSM 5 diagnosis with supporting documentation, level of risk of harm to self or others, financial risk, recommendations for the type and intensity of treatment and any referrals given to another treatment provider. Eligibility based on Provider's reasonable cause to believe the person requesting the intake assessment may be eligible for DHHS-funded gambling treatment services.

S9484	Crisis Services, per 15 min	\$22.00	Crisis Intervention Mental Health Services for Eligible Clients. Code for pre-enrollment use. For enrolled clients, use code H0004. Use of this code is limited to no more than 10% of the total claims for any calendar month.
G3000	Clinical Supervision of CPGC-I, per 15 minutes	\$22.00	Clinical supervision, by Board approved supervisor, provided to CPGC-I needed to meet minimum Board supervision requirement (60 hours total) or (2 hrs per month). For use only by Providers with CPGC-I staff that are employed or contracted to provide an average of 8 hours per week or more within the Provider's gambling treatment program. Every claim using this code must be documented in the CPGC-I staff file.
G3100	Mental Health Professional Case Consultation, per 15 minutes	\$22.00	Case consultation, by Mental Health Professional, provided to CPGC or CPGC-I or with their client, to assess and assist in treatment planning and case management for clients with psychiatric comorbidity. Every claim using this code must be documented in the client file.
G2300	Continuing Care Group Services, per activity	\$15.00	Services are provided by CPGC, CPGC Fill-in, or CPGC-I to individuals who have completed problem gambling treatment within the past 12 months and are utilized to facilitate continued recovery. Services can be provided within an existing therapy or psycho-educational group being provided to current clients or to a group of previous clients meeting on a regular basis for aftercare. To be entered as an encounter, the continuing care group must be at least 60 minutes in duration and the same participant may not be claimed more than once per week.
G2500	Transitional Housing, per day	\$25.00	Transitional housing refers to a supportive type of accommodation that is meant to bridge the gap from homelessness to permanent housing by offering structure, supervision, problem gambling recovery support, life skills, education and training.
G5000	Court Reporting, per 15 minutes	\$22.00	Court reporting, by CPGC or CPGC-I, provided directly or indirectly to court for purpose of consultation, recommendations, providing treatment updates, or providing testimony. Claimed time may include travel time between office and court room, detention center, or attorney office. Every claim using this code must be documented in the client file.
G5100	Court Assessment, per 15 minutes (16 unit claim maximum; allowable per administration and documentation of initial assessment)	\$25.00	Service provided by a CPGC to (a) determine whether offender has a gambling disorder and need compulsory mental health treatment and (b) assist the court to determine the most appropriate sentence for the person. Eligibility based on Nevada residency and written request by judge, defense attorney, or prosecutor.
G5200	Court Mandated Gambling Treatment counseling, not meeting medical necessity, per 15 minutes	\$11.00	Service provided by a CPGC or CPGC Fill-in. Psychological treatment of a court mandated client who meets DSM-5 criteria for Gambling Disorder, in sustained remission. When using this billing code, providers may charge clients with co-pays up to \$44 per hour (\$11 per 15-minute increment).

G5300	Court Mandated Gambling Treatment counseling, not meeting medical necessity, group per 15 min	\$3.50	Service provided by a CPGC or CPGC Fill-in. The practitioner seeks to help court mandated group member, who meets DSM-5 criteria for Gambling Disorder, in sustained remission, remain in remission. When using this billing code, providers may charge clients with co-pays up to \$14 per hour (\$3.50 per 15-minute increment).
t	Telehealth Specifier. To be placed following eligible procedure code.		Services provided using electronic information and telecommunication technologies to support long-distance clinical health care and health-related education. Use this specifier when a billable service is provided using video conferencing, the internet, and telephonic communications.

Nevada DHHS Problem Gambling Treatment
Add-on Procedure Codes and Rates for FY2020 & FY2021
(Updated 3/27/20)

Note: Reimbursement for “add on” procedure code claims limited to 5% of a gambling treatment grantee’s total grant amount. Add-on code percent limitation to grantee’s total grant amount subject to change during the grant period.

Code	Description	PGS Payment Amount	Service Criteria
T1016*	Case management, per 15 min	\$22.00	Services provided for coordinating access to and provision of services from multiple agencies, establishing service linkages, advocating for treatment needs, and aiding in obtaining entitlements such as Medicaid enrollment.
G2301	Extended Continuing Care Group Services, per activity	\$15.00	CC Group Services are provided by CPGC, CPGC Fill-in, or CPGC-I to clients who have completed problem gambling treatment within the past 36 months and are utilized to facilitate continued recovery. Services can be provided within an existing therapy or psycho-educational group being provided to current clients or to a group of previous clients meeting on a regular basis for aftercare. To be entered as an encounter, the continuing care group must be at least 60 minutes in duration and the same participant may not be claimed more than once per week.
T1013	Sign language/oral interpreter service, per 15 min	\$12.00	Sign language/oral interpreter services necessary to ensure the provision of services for individuals with hearing impairments or in the primary language of non-English speaking individuals. Such interpreters shall be linguistically appropriate and be capable of communicating in English and the primary language of the individual and be able to translate clinical information effectively. Payment for interpreter services is only allowed when provided in conjunction with another service such as assessment, individual/family therapy, or group therapy, etc. whenever feasible, individuals should receive services from staff, who are able to provide sign and/or oral interpretive services. In this case, interpreter services cannot be billed in addition to the therapeutic service.
50A**	Presentations to Allied Professionals, per 15 min	\$22.00	Time spent delivering presentations to professionals in health/medicine/social services/legal/financial with the express intent to follow up with individual contacts in order to establish relationship, develop screening and referral agreements and protocols, etc. Includes time spent preparing for meeting and developing presentations.

50B**	Presentations to Targeted High Risk Client Groups, per 15 min	\$22.00	Time spent delivering presentations to targeted high risk groups, including but not limited to: Incarcerated individuals, A/D clients, MH clients. These presentations shall be focused on signs and symptoms of disordered gambling, treatment options and how to access treatment. Code can be used to provide consultation/education with concerned others for the purpose of explaining importance of treatment and what can be expected. Includes time spent preparing and developing presentations.
50C**	Treatment Advertising	Actual Cost	Treatment Ads (web-based ads, radio, TV, newspaper). Treatment ads must follow Department policies per Section C of the Notice of Subawards and receive preapproval. When submitting claim, must include ad proof, invoice, and proof of payment.
60A	Data Reporting, per 15 min	\$5.00	Time spent entering intake, discharge, encounter data, and client contact information in the UNLV gambling treatment data system. When submitted claim, allocated time sheet must be included
60B	Quality Assurance, per 15 min	\$5.00	Time spent verifying claims, checking documentation accuracy, tracking documentation and claim procedures, and making corrective actions. When submitted claim, allocated time sheet must be included.
DEV***	Program Development	Actual Cost	Use of this code requires a Department pre-approved program development plan and budget. Approved program development plans must forward treatment system goals, emerging needs, or enhancement activities described within the present Strategic Plan.
MAT***	Program Materials	Actual Cost	Examples include costs of purchasing or reproducing client workbooks, client reading materials, client binders, folders for charts, etc. This code is not to be used to purchase depreciable business assets such as computers, furniture, etc. When submitting claim, must include invoice and proof of payment.
WFD***	Staff Professional Development	Actual Cost	Includes registration cost, travel, lodging and per diem, contracts for certification supervision or consulting. When submitting claim, include invoice and proof of payment.
TRA***	Transportation to Residential Gambling Treatment	Actual Cost	Client travel to DHHS funded gambling treatment residential services. Travel to be based on most cost-efficient means of transportation service that is clinically appropriate. When submitting claim, must include itinerary and proof of payment.

***T1016 code** must be associated with an enrolled client and count toward their client benefit cap.

****50A-50C codes**, known as Referral Pathways Codes, have the primary purpose of getting problem gamblers and/or family members enrolled in services, geared specifically towards increasing the number of clients receiving treatment. For Referral Pathways **documentation requirement**, please keep on file a copy of referral agreements, documentation of meetings, outline of presentations, copy of ads, flight schedules of media, exhibitor confirmation letter, etc. Note: Ads and publications must receive pre-approval.

*****For letter codes (MAT, WFD, TRA, DEV), documentation requirement**, every time a claim is reported with a letter code, please log: Code, date, brief description of activity/claim, claim amount, and form of payment / receipt. Travel must be at the GSA rates and receipts must be submitted for lodging and transportation.

Exhibit 5

**Nevada Department of Health and Human Services
Problem Gambling Treatment Benefit Extension Request Form 2020-2021**

PART A: Client Information & Certification of Need

Name: _____ Identification code: _____

- You have or are close to exhausting your Nevada State Resident benefit level for problem gambling treatment.
- You do not have private insurance or the financial means to pay for problem gambling treatment without continued support from the Nevada Department of Health and Human Services.
- You believe you are making progress toward your goals and desire to continue in treatment with your current problem gambling treatment provider.
- Are all the above statements true? Yes No

I hereby certify that I desire to continue problem gambling treatment, do not have insurance or other resources to pay for the continuation of treatment, and seek long term recovery from problem gambling.

Client Signature: _____

Date: _____

Place this complete form in the client's clinical file.

PART B: Treatment Team Clinical Review

Primary Counselor: _____

Clinical Supervisor: _____

Others Present During Clinical Review: _____

Client Admission Date: _____

Date of Clinical Review: _____

Date Last Gambled: _____

In early remission

In sustained remission

Gambling Disorder Severity (past 3 months): Mild: 4-5 Moderate: 6-7 Severe: 8-9 criteria met.

Clinical Justification for Requesting Benefit Exception (*must classify as one or more of the following*):

Relapsed within past 30 days

High Suicide Risk

High Relapse Risk

Acute Mental Health Crisis

Clinical Justification Narrative:

Schedule of Services (*how will benefit extension be used*):

Signature of Clinical Director: _____

Date: _____

Signature of Primary Counselor: _____

Date: _____

Place this complete form in the client's clinical file.

PART C: Gambling Treatment Provider Information & Certification of Compliance to Rule

Name of Agency Providing Problem Gambling Treatment: _____

Client identification code: _____

Amount of benefit requested in excess of the consumer’s benefit limit: \$ _____

Including this client, total of all client benefit extensions for the fiscal year: \$ _____

o *Note: Total benefit extensions may not exceed 5% of the grant award, for the current grant cycle. Only the actual amount expended on behalf of each client (rather than the requested amount) will apply toward the overall 5% extension limit.*

Has client had a prior benefit extension? No Yes If yes, Date(s) and Amount(s): _____

- The exception request was reviewed and approved by the agency’s gambling treatment clinical team or clinical supervisor.
- **Documentation** has been placed in the client’s clinical record **describing the clinical review** of the exception request including the **clinical justification** for requesting the exception (*PART B*).
- The client does not have third-party payor to cover the costs of continued care.
- *Note: Clients who have insurance but refuse to allow the provider to contact their insurance company are not eligible for benefit limit extensions.*
- The client is experiencing financial hardship and is therefore unable to afford out-of-pocket payment for the full costs of continued services.
- The treatment agency is not in possession of charitable contributions or other funds earmarked for covering the costs of care for those without treatment payment means.

I hereby certify that all the above statements are true.

Clinic Director Signature: _____

Date: _____

Place this complete form in the client’s clinical file. Do not send copy of PART A to DHHS.

For submitting benefit extension requests, email Kim Garcia (k.garcia@health.nv.gov) and include scanned copy of PART B and C or within body of email include all information from PART B & C along with a statement that a completed Benefit Extension Request Form has been placed in the client’s file.

Exhibit 6
Nevada
Telehealth Counseling Policy Statement/Guidelines
Updated March 19, 2020

This policy expands upon the Accessibility standard (I.F.) described in current Gambling Treatment Provider Standards within the Problem Gambling Services Strategic Plan: 2020 & 2021 Version 2.

As we continue to move forward in the information age, offering alternatives to traditional face-to-face counseling sessions is necessary to meet the needs of the community both during a public health crisis and during normal times. Telehealth counseling may be an effective and viable option for individuals that encounter barriers to attending traditional face-to-face counseling. Experts have identified specific groups of populations in which telehealth counseling may be suitable: persons in remote locations, underserved populations and adolescent and young adults.

This document has been designed to guide programs in the development and implementation of problem gambling treatment services using telehealth counseling. Please review the following guidelines for participating in telehealth counseling.

Technology:

There are numerous avenues of technology that could be used for telehealth counseling. Whatever technology your agency prefers to use, please confirm that the technology your agency chooses meets HIPAA and 42CFR requirements and is a video conferencing technology.

Equipment & Subscriptions:

Programs can use the problem gambling add-on code for Program Materials (MAT) to subscribe to teleconferencing services or rent any necessary equipment, such as webcams, computers, routers, or other equipment that is required to meet confidentiality requirements or to provide efficient telehealth counseling. This code is not to be used to purchase depreciable business assets such as computer. The MAT code can be used to purchase client workbooks and pay for postage if your program chooses to mail hardcopy workbooks to clients as a component of the telehealth gambling treatment program.

Training:

Programs can use the problem gambling add-on code for Staff Professional Development (WFD) to pay for training related to developing competencies in providing telehealth counseling services.

Client Eligibility:

Currently enrolled or new problem gambling clients and family members are eligible to participate.

The International Society for Mental Health Online recommends that an initial face-to-face meeting

be held for assessment purposes and to determine the appropriateness of online counseling for the individual's condition. Without an initial face-to-face assessment, misdiagnosis or inaccurate assessment is possible.

SAMHSA (2009) states that the following individuals would not be appropriate for online counseling: Individuals with suicidality; Individuals diagnosed with borderline personality disorder; Individuals with difficulty distinguishing reality from non-reality; Conditions that require face-to-face meetings for diagnosis.

Problem Gambling Services recommends that the above recommendations are followed, however, this is not a requirement as we understand it is not always possible to conduct face-to-face assessments.

Enrollment:

Complete the all UNLV forms as normal, along with normal releases and informed consent disclosures that specifically address the use of telehealth. Example: [Telebehavioral Health Informed Consent Library](#)

Billing:

When providing telehealth services, use appropriate procedure codes followed by the specifier “t” at the end of the code. For example, Intake Assessment code G2200 will be coded G2200t if the assessment was provided using telehealth methods.

Client Protections:

Agencies participating in telehealth counseling must adhere to the current Gambling Treatment Provider Standards within the Problem Gambling Services Strategic Plan: 2020 & 2021 Version 2 and follow the APA and ATA Telemental Health Guide, including, [Best Practices in Videoconferencing-Based Telemental Health](#). Highlights include:

- Individual must be currently enrolled in the problem gambling treatment program;
- Telehealth counseling must be provided by a qualified program staff within their scope of practice;
- Service Notes must follow the same criteria as face-to-face counseling and identify the session was conducted by electronic means and the clinical rationale for the electronic session;
- Telehealth counseling must meet HIPAA and 42 CFR standards for privacy;
- There must be an agreement of informed consent for telehealth counseling that is discussed with the individual and documented in the individual's service record; and
- Agency policies and procedures are in place to prevent a breach in privacy or exposure of client health information or records (whether oral or recorded in any form or medium) to unauthorized persons;

Additional considerations regarding client protections when participating in telehealth counseling, includes:

- Treatment process and procedures, including reasons for discontinuing telehealth counseling for an individual;
- Individual privacy regulations and client confidentiality needs;

- Informed consent
 - Risks and benefits of telehealth counseling
 - Actions to prevent risk to the individual
 - Procedures for emergency
- Providing for clients in case of emergency

Documentation:

Agencies will comply with current Gambling Treatment Provider Standards regarding documentation. The Individual Service Note must indicate that the session was conducted using “electronic technology”.

Evaluation:

Individual’s participating in telehealth counseling must complete the usual and customary consent for follow-up study participation. Consenting individuals will be included in gambling treatment follow-up surveys.

Additional Information on Telehealth:

- The [Telehealth Resource Center's](#) website provides assistance, education, and information to organizations and individuals who are actively providing or interested in providing health care at a distance.
- [NFArtec Telehealth Capacity Tool](#) is designed to help organizations assess their readiness to adopt telehealth technologies.
- The APA, in conjunction with the American Telemedicine Association, has just released [Best Practices in Videoconferencing-Based Telemental Health](#), a guide for mental health providers who want to begin doing telemental health, including telepsychiatry.

Online Resources for Clients with Gambling Issues:

- **Gamblers Anonymous:** GA offers phone in meetings and Zoom meetings. The schedule and access information can be found on <http://trusteewebsite.com/> . A list of GA Zoom meetings can be found on <https://gasteps.org/virtual-meeting-directory>
- **Gamtalk:** Gamtalk is an online support center for people with gambling issues. <https://www.gamtalk.org/>

Obtaining Department Approval to Provide Telehealth Services

Department written approval of provider protocols is required prior to offering a dedicated telehealth gambling treatment program (i.e., where the majority of a client’s treatment is provided remotely). Protocols must include copies of consent of telehealth services form, information on telehealth platforms to be used, procedures for client protections (include those listed above under the “client protections” heading, and telehealth ethical practice guidelines to be used (e.g., <https://www.apa.org/practice/guidelines/telepsychology>)

Additional Questions:

Contact: Kim Garcia, Social Services Program Specialist III, Nevada Department of Health and Human Services, Bureau of Behavioral Health Wellness and Prevention | Problem Gambling by phone (775-684-4057) or email (k.garcia@health.nv.gov).