

NH Department of Health and Human Services
 Division for Behavioral Health
 Bureau of Mental Health Services
 Bureau for Children's Behavioral Health

105 Pleasant St.
 Concord, NH 03301

Functional Support Services – Alternative Locations

DATE:	October 27, 2020
TO:	Community Mental Health Centers
FROM:	Julianne Carbin, Director BMHS & Erica Ungarelli, Director BCBH
SUBJECT:	COVID-19 Emergency Guidance #8: Alternative Locations for FSS

The Bureau of Mental Health Services (BMHS) and Bureau for Children's Behavioral Health (BCBH) is working with our provider community to adhere to the guidance outlined by the Centers for Disease Control (CDC), the State's Division of Public Health Services, and our federal and State partners. Although organizations are responsible for daily operations and management of their COVID-19 responses, the following common question has been raised by providers and therefore guidance is being provided.

To help us track and respond to questions most efficiently, please send communications regarding changes to community mental health center policies, processes, or contract requirements to Julianne Carbin and Erica Ungarelli with a "cc" to Julia McNamara:

Julianne.Carbin@dhhs.nh.gov; Erica.Ungarelli@dhhs.nh.gov; and Julia.McNamara@dhhs.nh.gov.

BMHS extends its sincere gratitude to those working to ensure the health and safety of the individuals and families we serve.

Timeline

COVID-19 Emergency guidance will be in place during the duration of the State of Emergency, as declared in [Executive Order 2020-04 issued by the Governor of the State of New Hampshire, and as renewed and extended](#). BMHS will provide, modify and extend this guidance as needed, until warmer spring weather makes outdoor and/or community activities possible.

Alternative Locations for Functional Support Services

Community mental health centers (CMHCs) have asked whether functional support services (FSS) may be provided in alternative locations during the COVID-19 pandemic. FSS is "provided in the individual's current living, employment or educational situation or other community setting," pursuant to He-M 426.12(b). BMHS recognizes that, due to the COVID-19 pandemic, some of the community settings may be unavailable, impractical or pose a risk to the health and safety of individuals and staff. Under the circumstances, BMHS will interpret "other community setting" as allowing alternative locations for FSS. To the extent possible, the locations should be consistent with individual and family choice. A waiver is not required, but if you have questions as to whether a certain community setting qualifies as an alternative location for FSS, please contact us.