

HCPF IMD Forum

Monthly on the 4th Thursday – 2 PM

Forum Agenda 7/27/2023

Introduction & Welcome.....5 Minutes

Review of Forum Purpose, Expectations, & HCPF Resources.....10 Minutes

Review of Health Management Associates (HMA) Survey project.....20 Minutes

Review of HCPF action items.....5 Minutes

Open Discussion on next steps.....15 Minutes

Wrap-up & Adjournment.....5 Minutes

HCPF Intros

HCPF's Behavioral Health Initiatives & Coverage Office (BHIC) is restarting this provider forum to:

- solicit feedback,
- gather information,
- and facilitate discussion.

John Laukkanen - Behavioral Health Strategy Manager

Carly Donohue-Torres - Adult Behavioral Health Continuum Policy Specialist

Forum Structure Going Forward:

HCPF would like to create a structured space that allows for the opportunity to share and develop ideas on a system, regulation, & policy level

Things to think about:

- *Would it be helpful to have a standing agenda item for review of data trends?
- *What specific structures would be most helpful to your organizations to accomplish our forum goals?

HCPF Provider Resource

*IMD Website:

[IMD Provider Website](#)

- IMD Definitions and Resources
- HCPF IMD Forum Information
- Ongoing Agenda and Presentation Materials from provider forums

*IMD Dashboard

HMA Stakeholder Summary Report

In June 2023, HMA presented their findings from several months of engagement with IMD facility stakeholders and identified various challenges related to current IMD policies

[HMA Final Stakeholder Presentation, June 5, 2023](#)

[Stakeholder Summary Report IMD Exclusion](#)

HMA Stakeholder Survey Results

HMA's stakeholdering work resulted in information and data that HCPF's Behavioral Health Initiative & Coverage Office will continue to utilize as we explore the possibility of an 1115 SMI/SED Waiver amendment.

- Several common themes related to reasons for stays beyond 15 days emerged from these discussions.
- In addition, the survey identified several other RAE related challenges

Barriers to meeting 15 day LOS limit

The following were identified as the 6 biggest barriers to treatment and successful discharge of patients from Inpatient Care within 15 days:

Awaiting State Hospital Beds

Continuum of Care Access Issues

Other facility serving member within the same month

Patient Acuity

Lack of safe discharge settings for the unhoused

Awaiting Court Ordered Medication/Treatment

RAE related issues not addressed with an 1115 Waiver:

- Inconsistent application of medical necessity criteria (MNC)
- Timely filing limits
- Denials of authorization to lower levels of care

Open discussion:

- Awaiting State Hospital Beds
- Patient Acuity
- Admission in another facility in same month
- Judicial Barriers/Delays in Court Ordered Medication
- Continuum of care access issues
- Care transition challenges with housing instability
- Inconsistent application of MNC
- Timely filing limits
- Denials of Authorization to lower level of care

What additional context would anyone like to add on today's overview?

What topics/barriers do we think are the highest priority?

What additional actions need to be completed for the August forum?

Action Items in Progress at HCPF

Development of a Campus Policy to accommodate Step-Down services expansion that addresses the IMD exclusion restrictions.

Compilation and analysis of data to evaluate trends on denials on both a facility and RAE level

Exploration of a possible 1115 SMI/SED Waiver amendment.

Other projects/forums where related conversations are happening:

1. Pursuit of discussion surrounding county level procedures regarding certification of court ordered medications
2. Collaboration with the CMHHs to identify and improve admission and discharge challenges
3. Discharge Barriers Workgroup

Discussion

During our initial meeting, HCPF staff reviewed the results of our IMD Risk Mitigation research project led by HMA. This report highlighted several issues that could be addressed by our forum with Colorado IMDs. Please review the HMA report posted on the IMD Webpage for additional details. Of the 9 challenges we reviewed, providers identified the following 4 as top priorities:

- 1.RAE Denials Data
- 2.Court ordered medication delays
- 3.Mental Health Hospital admission delays
- 4.Continuum of Care access issues re: Step Down beds

Action Items

For the August forum, HCPF would like to focus discussion on the first 2 topics:

- RAE Denials Data - Data will be shared from HCPF
 - HCPF will provide more details on data regarding IMD denials being seen by IMD Providers.
 - Facilities may consider preparing their own data to match with the state's overall information for a more robust discussion.
- Judicial Barriers/Court-ordered medication (COM) delays
- HMA Identified the following data:

Delays in court-ordered medication	0	Not reported	4 stays 136 days	12 stays 300 days	10 stays 333 days
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- This represents an average of a 30 day LOS when a member experiences COM delay.
- We would like to consider the following questions:
 - Does this data accurately reflect what the facilities are experiencing?
 - What counties seem to have the highest delays? What counties have the least delays?
 - Does anyone have any policies or procedures to share that seem to have improved this issue at their facility?