



HCPF IMD Forum

Monthly on the Last Thursday of each month – 2 PM

Forum Agenda 1/25/2024

Introduction & Welcome.....5 Minutes

Previous Topic Review & Discussion.....25 Minutes

Readmission to other facility, COM, Admissions to State Hospital

1115 Demonstration Waiver SMI/SED Amendment.....5 Minutes

Timely Filing Limits.....20 Minutes

Questions and Topics for Next Forum.....5 Minutes

Barriers Identified

- ✓ Awaiting State Hospital Beds
- ❑ Patient Acuity
- ✓ Admission in another facility in same month
- ✓ Delays in Court Ordered Medication
- ✓ Continuum of care access issues
- ❑ Care transition challenges/ housing instability
- ✓ Inconsistent application of Medical Necessity Criteria (RAE Denials Data)
- ✓ Timely filing limits
- ❑ Denials of Authorization to lower level of care

Multiple IMD visits in one month

Monthly IMD Admissions October 2019 to August 2023	
Members	14,044
Members Readmitted	1,728
Members Readmitted %	12.30%
Members Readmitted At Different Facility	1,111
Members Readmitted At Different Facility %	64.29%
Visits	21,819
Readmitted Visits (Initial Admission Included)	3,797
Readmitted Visits At Different Facility	2,096
Readmitted Visits Exceeding 15 Days	730
Readmitted Visits Exceeding 15 Days %	19.23%

On average 15.5 times per month a member with multiple visits in the same calendar month exceeds 15 days.

- On Average from 2019 to 2023, a member experiencing multiple episodes of care in the same calendar month, which combined exceed 15 days, occurs 15.5/ month.
- 55% of these readmits occur in a facility different than the original facility.
- All facilities who cared for a member in that calendar month lose payment when this happens.

Certification

➤ Continued Cross-Agency Discussions are ongoing

➤ Guest Speaker:
Jessica Bell, BHA
jessica.bell@state.co.us
Associate Director of the 27-65
Unit

Discussion Topics:

1. Jurisdiction to File
2. Requirements to transfer a Certification

State Hospital Admissions

- HCPF is working with CDHS to determine the full extent of State Hospital bed need
- What is the referral source to the State Hospital for Medicaid members?
Fort Logan
 - Most of the referrals come from the CMHCs. If the individual is not assigned with a MHC, the RAE refers.CMHI-Pueblo response
 - 1.All the individuals on the waitlist are court ordered for in-patient restoration

- Discussion
 - How many admissions in calendar year continue to meet criteria to continue at inpatient level of care after 15 days of treatment?
 - What questions would you liked asked to be discussed with Admissions Director?

1115 Demonstration Waiver Amendment

Amendment will include request to reimburse the first 15-days of IMD stays that exceed the current 15-day limit under “in lieu of” authority.

This will permit Colorado to modify its current practice through which a prorated capitation payment is made to the RAE for the days within the month that the enrollee was not in an IMD and the RAE’s subsequent payment recoupment from the IMD for the entire stay.

Any additional questions or comments at this time?

Next Steps:

- Public Comment – 2 Hearings scheduled in February with in-person attendance optional
- Please reach out to hcpf_1115waiver@state.co.us with additional inquiries

Timely Filing Limits

IMDs reported inconsistent timely filing limits in MCE contracts as an issue per the HMA 2022 Stakeholder Summary Report

- MCE: What is your current timely filing standard?
- What challenges or variances can be provided as examples?
 - What Context Can the IMD Providers add to this Concern?
- How could this be further quantified to help identify opportunities for internal process improvements?

Walk-On Items?

Next Time....

- 1. Further engage Admission to State Hospital question**
- 2. Denials of Authorization to Lower Levels of Care: Discrepancies between MCEs**

Discussion Notes

- Multiple IMD Stays within One Month Data
 - Providers reported that the new data set seems to more appropriately reflect the experiences of the IMD campuses
- Patient Certifications
 - Guest speaker Jessica Bell was unable to attend due to extenuating circumstances. She will attend the February IMD Forum
- Colorado State Hospital Admissions
 - Discussion continued regarding the challenges private psych hospitals continue to experience in placing patients in State Mental Health Hospitals
 - It was suggested that part of the issue may be due to confusion on the most appropriate means to refer a patient
 - Is the best practice to work collaboratively with the patient's CMHC & RAE or to directly refer?
 - It was suggested that a separate RAE/CMHC meeting regarding long-term inpatient behavioral health patients might be confusing the matter of patient placements at State Hospitals
 - One of the providers shared that they have had examples of patient's waiting more than 60 days for placement at a State Hospital
 - IMD providers will be asked to respond with facility data to continue exploring this as a challenges for both private psychiatric hospitals and State Hospitals

Discussion Notes

- 1115 Demonstration Waiver Amendment - SMI/SED Component
 - The Department is currently in a Public Comment period for the 1115 Demonstration Waiver Amendment
 - The overall timeframe was reviewed, with the timeline for submission anticipated to be April 2024
 - Staff reiterated that any potential affects on MCE contracts would not take place until ACC Phase III
- Timely Filing Limits
 - IMD Providers report that there are concerns with variability in timely filing standards between various MCE contracts particularly in circumstances when a patient is retroactively enrolled in Health First Colorado, since that process can take time and providers may not be notified.
 - Providers were reminded that particular circumstances that may involve technical issues around patient retroactively enrollment should be sent to Tim Gaub for further support at tim.gaub@state.co.us
 - Retroactive enrollment has been an increasing occurrence in lieu of the PHE Unwind
- Walk-On Item:
 - Incarcerated Status for MCD patient
 - Providers share that they are still experiencing technical issues to effectively correct eligibility status for patients moving into and out of Incarcerated Status.
 - HCPF is able to furnish a recently published memo for clarification:
 - [Limited Medicaid Benefits for Incarcerated Individuals](#)
 - Providers flagged an additional area of impact related to increased needs from recently immigrated patients.

Action Items

- **HCPF:**
 - ☐ Facilitate guests at the IMD forums in February and March to include: Jessica Bell – BHA, and Colorado Mental Health Hospitals Admission leadership.
 - ☐ Danielle to consider process mapping project re: Private Psychiatric Hospital referral to State Mental Health Hospitals
 - ☐ Follow-up with Josh Montoya (County Liaison) to address PHE Unwind concerns and represent the challenges of IMD campuses in the current environment.
 - ☐ Provide operational memo on [Limited Medicaid Benefits for Incarcerated Individuals](#)
- **Provider Facilities:**
 - ☐ Respond to requests for information and surveys sent by HCPF
- **MCEs:**
 - No Action Items at this time