Medicaid Reimbursement for Community Health Worker Services

January 9, 2024

Presented by: Morgan Anderson - HCPF, Tamara Keeney - HCPF, Alaina Kelley - HCPF, Adela Flores-Brennan - HCPF
Our Mission:
Improving health care equity, access and outcomes for the people we serve while saving Coloradans money on health care and driving value for Colorado.
Welcome & Introductions

The Department of Health Care Policy and Financing (HCPF) oversees and operates Health First Colorado (Colorado’s Medicaid program).

Adela Flores-Brennan, Medicaid Director
Morgan Anderson, Primary Care Unit Supervisor
Tamara Keeney, Research and Analysis Manager
Alaina Kelley, CHW and Prevention Services Benefit and Policy Specialist
Meeting Norms

• To reduce background noise, all participants are muted upon entering the webinar.

• Participants are encouraged to use the Q & A pod or raise your hand using Zoom’s toolbar to ask your question verbally. We will also be using Zoom polls during today’s event.

• As this meeting may be recorded, please refrain from providing personally identifiable information or protected health information.

• Today’s event will include a Spanish interpreter and automated captions. Both accessibility services are available through your Zoom toolbar.
Who is HCPF?

• HCPF = Colorado Department of Health Care Policy and Financing
• Designated as Colorado’s single state Medicaid agency
• Responsible for supervision and oversight of Colorado’s public insurance programs

• Visit our website: https://hcpf.colorado.gov/
Acronyms

HCPF = Health Care Policy and Financing
CDPHE = Colorado Department of Public Health and Environment
CMS = Centers for Medicare and Medicaid
CHW = Community Health Worker
SPA = State Plan Amendment
MCO = Managed Care Organization
RAE = Regional Accountable Entity
FFS = Fee For Service
PMPM = Per Member Per Month
What is Medicaid?

• Medicaid provides health coverage to millions of Americans, including eligible low-income adults, children, pregnant people, elderly adults and people with disabilities.
• Medicaid is a federal and state partnership

What is Health First Colorado?

• Free or low-cost public health care coverage for Coloradans who qualify
• Comprehensive benefits and services
• Care coordination
Objectives

After this presentation, stakeholders should have a better understanding of:

• CHWs as providers within the current environment
• Senate Bill 23-002 and its’ impact on CHW Medicaid policy
• Options for federal authority and HCPF recommendations
• Timeline and next steps

During this presentation, stakeholders will have the opportunity to provide feedback on:

• How should CHW services be defined?
• Which specific CHW activities should be reimbursed?
• What services are CHWs currently providing? What services do CHWs want to provide that they currently do not?
• Other related concerns?
# Agenda

## Agenda Items

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<th>Presenter</th>
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<td>HCPF Staff</td>
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<td>Meeting Norms and Structure</td>
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<td>HCPF Staff</td>
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<td>3</td>
<td>Senate Bill 23-002 Overview</td>
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<td>Timeline for Implementation</td>
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<td>CHW Competencies vs. Coverage Discussion</td>
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<td>HCPF Staff</td>
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<td>Federal Authority Option Overview and Discussion</td>
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<td>HCPF Staff</td>
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<td>7</td>
<td>Stakeholder Comments</td>
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<td>All</td>
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<td>8</td>
<td>Wrap-up and Next Steps</td>
<td>10 minutes</td>
<td>HCPF Staff</td>
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Future Meeting Topics

• Supervision of CHWs
• Community Based Organization Enrollment and Reimbursement
• Reimbursement Levels
• Benefit limitations
• Clarification of CHWs’ role in the health care delivery system including:
  - Managed Care
  - Case Management
  - RAE Care Coordination
  - Community Centered-Boards/Single Entry Points
  - Behavioral Health Organizations
History of CHWs in Colorado Medicaid

Regional Accountable Entities (RAEs) and their contracted medical homes may use their administrative per member per month funding from Colorado’s Medicaid program to pay for CHW services.
Senate Bill 23-002 Overview

• Passed with bipartisan support and signed into law on May 10, 2023

• Requires HCPF to:
  ○ Hold four public stakeholder meetings
  ○ Seek federal authorization to reimburse for CHW services from the Centers of Medicare and Medicaid (CMS) by **July 1, 2024**
  ○ Leverage the voluntary CHW registry
  ○ Benefit go-live date: **July 1, 2025**
  ○ Report in Smart Act Hearing by **January 31, 2026**
Community Health Workers

The American Public Health Association defines "community health worker" as a frontline public health worker who is a trusted member of, and has a close understanding of, the community that worker serves. This trusting relationship enables the worker to serve as a liaison between health and social services and improve the quality and cultural competence of service delivery. "Community health worker" is meant to be an umbrella term for individuals who may go by many names, such as health promoters, community outreach workers, promotores de salud, health navigators, and patient navigators.
Poll

In the chat, please share your answer on how your organization is currently utilizing CHWs.

Please only answer this question if you are a health care organization/clinic.

How are you using CHWs?

1. We employ CHWs.
2. We refer patients to CHWs outside the health care organization/clinic.
3. We don’t currently use CHW services, but we plan to employ CHWs in the future.
4. We don’t currently use CHW services, but we plan to refer patients to CHWs outside the health care organization/clinic.
5. We are interested in employing CHWs, but we need more information.
Poll

In the chat, please share your answer on how your organization is currently utilizing CHWs. Please only answer this question if you are a community-based organization.

If you are a community-based organization, what would your interest level be in enrolling with Health First Colorado?

1. We are interested in enrolling with Health First Colorado to receive direct reimbursement for CHW services.
2. We are interested in possibly enrolling with Health First Colorado, but we need more information.
3. We are not interested in enrollment with Health First Colorado and would prefer to partner with Health Care Organizations/Clinics that bill on our behalf.
Timeline and Phases of Implementation

- **May 2023**
  - SB23-002 Passed

- **May - Feb 2024**
  - Utilize project management principles to engage internal working teams and external stakeholders to inform CHW reimbursement policy development

- **Feb - July 2024**
  - Follow existing formal policy promulgation process including public comment, consultation summary and appropriate notices; submit to CMS

- **July 2024 - July 2025**
  - Identify and establish process for necessary systems, technical, or operational changes to support final policy implementation

- **July 2025**
  - Benefit go-live
CHW Competencies vs. Medicaid Coverage

CDPHE core competencies for CHWs

1. Community Assessment, Engagement and Capacity Building
2. Individuals Assessment and Advocacy
3. Effective Communication
4. Cultural Responsiveness and Mediation
5. Education to Promote Healthy Behavior Change
6. Care Coordination
7. Use of Public Health Concepts and Approaches
8. Professional Skills and Conduct

What CMS has covered in other states

► Health Promotion and Coaching
► Health Education and Training
► Health System Navigation and Resource Coordination
Federal Authority Options

1. State Plan Coverage (Fee for Service)
2. Managed Care
3. 1115 Demonstration Waiver

- Concerns with Option 3:
  - Timeline for approval exceeds deadlines in SB23-002
  - Temporary authority
  - Recently CMS has been encouraging states to use State Plan/MCO options for CHW reimbursement
State Plan Amendment

• What is a SPA?
  - A Medicaid and CHIP state plan is an agreement between a state and the Federal government describing how that state administers its Medicaid program.
  - The state plan sets out groups of individuals to be covered, services to be provided, methodologies for providers to be reimbursed and the administrative activities that are underway in the state.
  - When a state is planning to make a change to its program policies or operational approach, states send state plan amendments (SPAs) to the Centers for Medicare & Medicaid Services (CMS) for review and approval.
State Plan Coverage - FFS

• SPA Example
  - Minnesota

• Pros
  - Quick timeline
  - Consistent funding
  - Streamlined and efficient
    - CMS encourages SPAs for CHW services
  - Budget

• Cons
  - Less flexibility in reimbursement
  - Billing administrative burden
Managed Care

• What is Managed Care?
  - Medicaid managed care provides for the delivery of Medicaid health benefits and additional services through contractual arrangements between state Medicaid agencies and managed care organizations (MCOs) that accept a set per member per month (capitation) payment for these services.

MCOs in Colorado (~10% of Medicaid population)
  - Denver Health Medicaid Choice
  - Rocky Mountain PRIME

Primary Care Case Management in Colorado (Entire Medicaid population except PACE program)
  - Regional Accountable Entities (RAEs)
    - HCPF sends Per Member Per Month (PMPM) payments to RAEs for care coordination
Managed Care - PMPMs

• Managed Care Example
  ▪ Idaho

• Pros
  ▪ Reimbursement could be more flexible

• Cons
  ▪ Administrative Burden: multiple RAEs = multiple billing paths
  ▪ Providers will still need to enroll with HCPF
  ▪ Potential variation between RAEs
Option 1: State Plan Coverage (FFS)

Option 2: Managed Care

CHWs and Providers bill HCPF directly, receive Fee Schedule Reimbursement

CHWs and Providers bill RAEs
CHW Reimbursement Options

Option 1: State Plan Coverage (FFS)

- CHWs and Providers bill HCPF directly, receive reimbursement based on fee schedule
- Consistent funding
- **Key Considerations:** streamlined review process ensures a July 2025 start date, limited to fee schedule reimbursement

Option 2: Managed Care

- CHWs and Providers bill RAEs
- Consistent funding but RAE contracts must be procured every 7 years
- **Key Considerations:** reimbursement could include care coordination, but every RAE would have own reimbursement process.
CHW Registry, Training, and Enrollment

- SB23-002 requires HCPF to use the voluntary competency-based CHW registry for Medicaid reimbursement.
- Other state approaches to CHW lived experience:

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<tr>
<th>State</th>
<th>Requirements</th>
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<tbody>
<tr>
<td>Indiana</td>
<td>Only recognizes certification from specific entities</td>
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<tr>
<td>Minnesota</td>
<td>Must have a valid certificate from the Minnesota State Colleges and Universities (MnSCU)</td>
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<tr>
<td>Oregon</td>
<td>Complete approved training program; or Worked/volunteered for at least 3000 hours; Previous training may count towards cert</td>
</tr>
<tr>
<td>South Dakota</td>
<td>The staff training policy must identify a process to certify that the individual has completed an approved training; 6 hours of training annually</td>
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<tr>
<td>California/Rhode Island</td>
<td>Worked/volunteered for 2,000 hours (CA); Earn a certificate of completion within 18 months (CA and RI)</td>
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<tr>
<td>Louisiana</td>
<td>Allows for lived experience as its own pathway (no need for cert)</td>
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More Prescriptive → More Flexible
Enrollment and Billing

• Medicaid Enrolled Providers
  ▪ Need National Provider Identifier (NPI) and other enrollment criteria
• Submit claims through online portal
  ▪ Billing details (who, what, when, where, why)
• Reimbursement or Denial
  ▪ Based on accuracy of claim submission

Poll: Where do you feel you are in terms of familiarity with Medicaid billing/structure (1-10 with 10 being “expert”)
Medicare and CHWs

- G0019 and G0022
  - Community Health Integration Services
- G0136
  - Social Determinants of Health (SDOH) Risk Assessment
Clarifying Questions

(will be moderated via chat)
Stakeholder Discussion Questions

• How should CHW services be defined?
• Which specific CHW activities should be reimbursed?
• What services are CHWs currently providing? What services do CHWs want to provide that they currently do not?
• Other related concerns?
Next Steps

• January 23rd Stakeholder Meeting
• Draft proposal for federal authority
• February 13th Stakeholder Meeting
• February 27th Stakeholder Meeting
Contact Info

Written comments are welcome!

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Thank you!