



INFORMATIONAL MEMO

Title: Organized Health Care Delivery System (OHCDS) Updates for Case Management	Topic: HCBS-Multiple
Audience: Case Management Agencies (CMA), Program Approved Service Agencies (PASA)	Sub-Topic: Provider Guidance
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Purpose and Audience:

The purpose of this Informational Memo is to notify case managers, service providers, members, families, and other interested stakeholders of existing requirements pertaining to billing under the Organized Health Care Delivery System (OHCDS) model and the allowable services. This memo also announces that Extraordinary Cleaning has been added to the list of services allowable under the OHCDS model.

Information:

Overview of OHCDS

Within the Developmental Disabilities (DD), Supported Living Services (SLS), and Children's Extensive Supports (CES) waivers, some services may be delivered through an Organized Health Care Delivery System (OHCDS) arrangement. This model allows a Case Management Agency (CMA) to act as a Medicaid provider and contract with qualified vendors to deliver services.

An OHCDS must provide at least one Medicaid service directly and may subcontract additional services to other qualified providers. The OHCDS enters into a provider agreement with the Department of Health Care Policy and Financing (HCPF), eliminating the need for subcontractors to hold separate agreements with Medicaid. However, all subcontractors must meet waiver requirements and qualifications for the services they deliver.

Provider Contracting and Payment

When using an OHCDS model, payment is issued directly to the OHCDS, which then reimburses its subcontractors. The OHCDS is responsible for ensuring all subcontracted services comply with program rules. Importantly, the OHCDS must not receive any financial gain or other benefit from coordinating or managing the service arrangement.

Role of Case Management Agencies as OHCDS

Case Management Agencies (CMAs) may act as the OHCDS when qualified providers are unavailable in their designated service area. In this role, CMAs must:

- Become an enrolled Medicaid provider
- Submit claims for approved services
- Establish purchase agreements with vendors
- Attempt to obtain at least two bids where feasible
- Ensure vendor qualifications and authorization
- Maintain fair market pricing and mitigate conflicts of interest

The OHCDS function will be added to the CMA contract and is no longer limited to Intellectual and Developmental Disabilities waivers.

Services Authorized for OHCDS

The following services may be billed under the OHCDS model by CMAs:

- **Extraordinary Cleaning** - CES, SLS (Section 8.7522)
- **Assistive Technology** - BI, CES, SLS (Section 8.7507.C.1)
- **Specialized Medical Equipment and Supplies** - CES, DD, SLS (Section 8.7547.C.1)
- **Vehicle Modification** - CES, SLS (Section 8.7554.C.1)
- **Vision Services** - DD, SLS (Section 8.7555.B.1)
- **Recreational Fees/Passes** - CES, SLS (Section 8.7504.C.1)
- **Primary Caregiver Education (formerly Parent Education)** - CES (Section 8.7540.C.1)
- **Non-Medical Transportation (NMT)** - BI, CIH, CMHS, DD, EBD, SLS (Section 8.7535.C.1)
 - For NMT, reimbursement includes public transportation billing codes A0110 and T2004, covering tickets and passes.

Attachment(s):

None

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