

OPERATIONAL MEMO

Title: Pediatric Long-Term Home Health (LTHH) PAR Resumption Information for Members	Topic: Benefits
Audience: Members, Family Members, Providers, Stakeholders, Advocates	Sub-Topic: Long-Term Home Health
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Legal Authority: 42 U.S.C. § 1396a	
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HCPF Memo Series can be accessed online: https://www.colorado.gov/hcpf/memo-series

Purpose and Audience:

Issue Date: Dec. 17, 2024 **Approved By:** Colin Laughlin

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The purpose of this Operational Memo is to update members, family members, providers, stakeholders, and advocates on the timeline for resuming Prior Authorization Requests (PARs) for Pediatric Long-Term Home Health (LTHH) services. These services include Registered Nursing (RN), Certified Nursing Assistant (CNA), Physical Therapy (PT), Occupational Therapy (OT), and Speech Therapy/Speech-Language Pathology (ST/SLP).

Information:

Pediatric LTHH PARs have been on pause since July 1, 2020. A phased-in approach to restart PAR requirements began on Nov. 1, 2021; however, this process was paused again on Feb. 28, 2022, due to the transition to a new utilization management (UM) vendor and the need to address administrative and process improvements identified

through stakeholder engagement. Prior authorization is a federal requirement per 42 CFR 456.3; the Department intends to fully reinstate the PAR requirement by April 6, 2026.

The Department of Health Care Policy and Financing (HCPF) recognizes that the primary focus is ensuring members receive timely access to the care they need while minimizing potential disruptions. Families play a pivotal role in the care process, and HCPF is committed to providing clear communication, resources, and assistance to help navigate this transition confidently. Implementing Pediatric LTHH PARs will follow a gradual, phased-in approach to allow a smooth transition and avoid overwhelming providers while maintaining high-quality care for individuals and families who rely on these essential services.

Soft Launch for LTHH Therapies

The Soft Launch is not mandatory, but providers are expected to participate by submitting at least 10% of Pediatric LTHH Therapy PARs monthly. This period will allow providers the opportunity to familiarize themselves with the process and understand submission requirements ahead of the PAR Go-Live period. **During this period, no member will be denied benefits.** When medical necessity is determined by Acentra Health, an approved PAR would immediately count toward the member's service and be effective for up to one year. The Soft Launch period encourages Home Health Agencies (HHAs) to begin submitting PARs to gain valuable feedback and education regarding the reimplementation process. Training will be provided to HHAs as requested/needed; this will be held in a 1:1 format, group sessions, prerecorded webinars, or other mediums to be determined.

Go-Live for all PARs

The Go-Live period differs from the Soft Launch, in that PAR submissions are required for the respective services. For members utilizing a HCBS waiver program, LTHH PARs will need to be submitted based on the waiver's Support Plan certification date. For all other members who do not receive HCBS waiver services, it is expected that providers submit 10% of all therapy Pediatric LTHH PARs and 15% of RN/CNA Pediatric LTHH PARs each month. A medical necessity review will be completed by Acentra, similar to the Soft Launch, but services not found to be medically necessary will be denied, and members and providers will be alerted to potential changes in hours and services.

HCPF will post updates on the <u>LTHH webpage</u>. HCPF will communicate changes via the <u>Memo Series</u> and stakeholders may submit questions to the <u>homehealth@state.co.us</u> inbox. Training opportunities with Acentra Health and HCPF are forthcoming, but

providers can begin the process of familiarizing themselves with the PAR submission process through the Atrezzo Portal by visiting the <u>ColoradoPAR Training webpage</u>.

Definition(s):

The **Soft Launch** is a voluntary phase during which providers can submit PARs for review by Acentra Health. During this period, the outcome of submitted therapy Pediatric LTHH PARs will not impact the current status of the member's benefits. HCPF will actively monitor submission progress throughout the Soft Launch period and provide education to providers when necessary.

The **Go-Live** phase will require providers to submit Pediatric LTHH PARs for members in a predetermined, phased-in approach. Acentra Health will conduct medical necessity reviews and in the case of a reduction or denial in services, members and providers will be notified of potential changes and be provided their appeal rights. Providers must adhere to the phase-in instructions provided by HCPF to ensure all PARs are reviewed by April 6, 2026.

PAR Resumption Timeline for PT, OT, ST/SLP, RN, and CNA Services:

- Feb. 3, 2025
 - Soft Launch for PT, OT, and ST/SLP PARs
- No Sooner than May 1, 2025
 - o Go-Live for PT, OT, and ST/SLP PARs
 - Home Health Agencies (HHAs) will be notified when the Maintenance of Effort (MOE) requirement is lifted. A 30-day advance notice will be provided before the Go-Live period begins.
- July 1, 2025
 - Go-Live for RN and CNA PARs
- July 1, 2025 April 6, 2026
 - Providers will be required to submit PARs for medical necessity review using a phased-in approach. Detailed instructions and timelines will be communicated prior to the start of the Go-Live period.
- April 6, 2026
 - PARs are required for all services, for all members

Attachment(s):

None

HCPF Contact:

Homehealth@state.co.us