

# Nursing Facility Stakeholder Meeting

July 19, 2023

# Agenda

- Announcement, Introductions
- Center for Behavioral Health in Nursing Facilities
- HB23-1228 - Audited Financial plan
- Sustainability/Innovation Plans
- July & August Fee/Payment Transactions
- CHOW Process
- SFY 23-24 iC Reimbursement Rates
- Public Comment





# Center of Excellence Overview



CENTER OF  
**EXCELLENCE**  
FOR BEHAVIORAL HEALTH  
IN NURSING FACILITIES



# Center of Excellence for Behavioral Health In Nursing Facilities

- Cooperative agreement between two federal agencies:
  - Substance Abuse and Mental Health Services Administration (SAMHSA)
  - Centers for Medicare and Medicaid Services (CMS)
- Awarded to Alliant Health Solutions
- Three-year grant: Started September 30, 2022



# SAMHSA Center of Excellence Model

---

## **SAMHSA Centers of Excellence Model:**

Provide training and technical assistance on behavioral health needs of special populations.



## **Examples of other SAMHSA Centers of Excellence:**

- E4 Center of Excellence for Behavioral Health Disparities in Aging
- African American Behavioral Health Center of Excellence
- Center of Excellence for Infant and Early Childhood Mental Health Consultation
- LGBTQ+ Behavioral Health Equity Center of Excellence

# COE-NF Purpose

**Purpose:** The COE-NF serves as a centralized hub for expanding capacity in CMS certified nursing facilities to care for residents with a variety of behavioral health conditions. Training, technical assistance, and workforce development are provided to staff in nursing facilities.

**Behavioral health areas of focus:**

- Serious Mental Illness (SMI)
- Serious Emotional Disturbance (SED)
- Substance Use Disorders (SUD)
- Co-Occurring Disorders (COD)
- Updated CMS nursing facility guidance (behavioral health, resident rights, quality of care)



# COE-NF National Staffing Model

## Regional Behavioral Specialists Model

- Experienced behavioral health professionals
- 10 COE-NF Behavioral Specialists
  - Alliant regions 1,2,3,4,5,7
- Each specialist is dedicated to an HHS region
- They live and work in the region they serve

## Comagine Health

- Partner
- Cohort Learning
- Supporting regions 6,8,9,10

## Additional Support

- Recovery specialist
- Training and education lead
- Subject matter experts on a variety of behavioral health topics



# COE-NF Behavioral Specialist Region 8



**Stephanie Smith, MSW, LCSW**  
Behavioral Specialist: Region 8  
Lives in Colorado

**Region 4:** Montana, North Dakota, South Dakota, Wyoming, Utah, and Colorado





# COE-NF Services Audience

- COE-NF offers training and resources for all nursing facility staff
  - Administrators, directors of nursing, social workers, activities, nurses, nurses aides, rehabilitation, environmental services, and dietary team members
- All staff benefit from knowledge and skills regarding resident's behavioral needs, and CMS guidance on behavioral health education.

# Services Available to Nursing Facilities

## Foundational Trainings

- Behavioral health trainings identified needs assessment (literature review/interviews)
- Frequently offered and available on a monthly rotation
- Multiple facilities participate in same training session
- Trainings are inclusive of, but not limited to:
  - **De-Escalation Strategies** (Certificate program)
  - **Mental Health First Aid** (Certificate program)
  - **Question, Persuade, Refer** (Certificate program)
  - **Mental Health 101**
  - **Substance Use 101**
  - **Trauma-Informed Care**



# Online Resource Hub

- All resources on SMI/SED/SUD/COD topics with a specialized focus on nursing facility considerations
- On-demand learning modules – utilize when most convenient for staff
- Bite-sized learnings
- Fact sheets and educational flyers





# Services Available to Nursing Facilities

## Customized Technical Assistance

- Facility level behavioral health individualized technical assistance
- Provided by behavioral specialists based out of the region they cover
- Customized training opportunities to match facility's needs



# Cohort Learning Initiative

- Join a group of facilities to learn together and from each other
- Monthly series of learning opportunities
- Each session has educational component and group sharing/learning component
- Coming September 2023



# Eligibility

- COE-NF is funded to serve CMS Certified nursing facilities
- Facilities should be listed on the CMS Care Compare site as a **nursing facility** or **skilled nursing facility**
- Nursing facilities that are **not** CMS-certified assisted living facilities are **not** eligible for services
- Ineligible facilities can still access the COE-NF free online resource hub, however those facilities are not eligible for technical assistance or trainings.





# When to Request Help from the COE-NF

## **Request assistance with:**

- Gaps identified in staff knowledge or skills in meeting behavioral health needs of residents
- Difficulty meeting a particular resident's behavioral health needs
- Where to start and how to prioritize training and skills development for staff around behavioral health needs of residents

## **Inquiries We Refer:**

- Assistance in non-behavioral health areas
- Requests or concerns from residents or care partners
- Requests from providers that are not CMS certified nursing facilities
- Emergencies - call 911



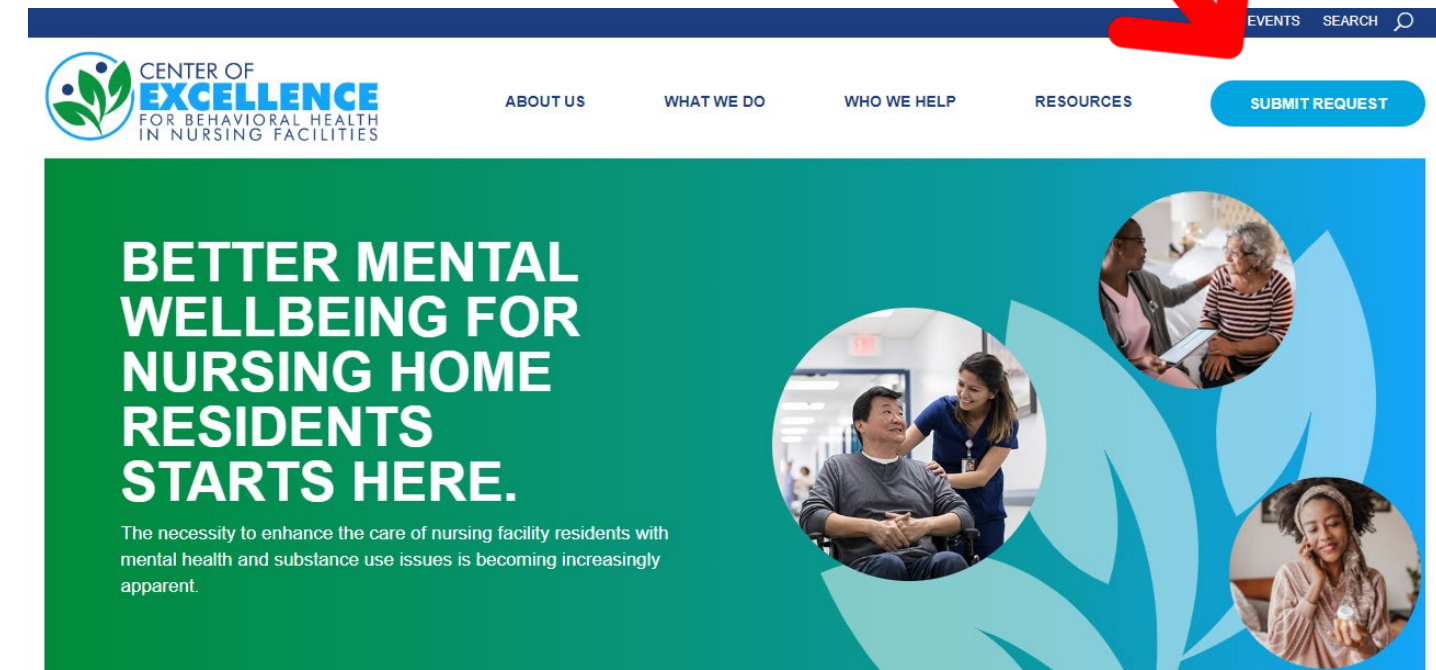
# How to Submit a Request

## Dedicated Website

- Online form where nursing facilities can submit consultation requests
- Include CCN number and full facility name
- Online requests are responded to within **48 hours**
- <https://nursinghomebehavioralhealth.org/request-assistance>

## National Call Center: (844) 314-1433

- Staffed by COE-NF behavioral specialists
- Assistance with completing the consultation request form
- Live Monday-Friday from 1-5 p.m. EST
- Messages will be responded to within **one (1) business day**



# Engagement Strategies

## Monthly Newsletter

- Shares behavioral health resources
- Provides nursing facility behavioral health regulatory updates
- Announces upcoming training opportunities

## Social Media Profiles

- LinkedIn: [www.linkedin.com/company/nursinghomebh/](http://www.linkedin.com/company/nursinghomebh/)
- Twitter: [twitter.com/NursingHomeBH](https://twitter.com/NursingHomeBH)
- Facebook: [www.facebook.com/NursingHomeBH](https://www.facebook.com/NursingHomeBH)
- YouTube: [www.youtube.com/channel/UCgnRi9EFB9rXApnIUwS09sw](https://www.youtube.com/channel/UCgnRi9EFB9rXApnIUwS09sw)

## Text Messaging Platform

- Enables nursing facility staff to receive COE-NF updates on their smartphone

**SCAN ME**



**Scan QR code to  
sign up for the  
COE newsletter.**





# Questions ?



# Presenter Contact Information

**Stephanie Smith, MSW, LCSW**

Behavioral Specialist, Region 8

Phone: 470-857-5283

[Stephanie.Smith2@AlliantHealth.org](mailto:Stephanie.Smith2@AlliantHealth.org)

[StSmith@Comagine.org](mailto:StSmith@Comagine.org)

# Connect with Us!

---

**SCAN ME**



## **Subscribe to receive text messages from COE-NF!**

Scan the QR code or visit <https://bit.ly/COETextList> to stay up-to-date on COE-NF services and news.

## **Contact us:**

For more information or to request assistance, we can be reached by phone at **1-844-314-1433** or by email at [coeinfo@allianthealth.org](mailto:coeinfo@allianthealth.org).

## **Visit the website:**

[nursinghomebehavioralhealth.org](https://nursinghomebehavioralhealth.org)



Thank You!

Thank you!



CENTER OF  
**EXCELLENCE**  
FOR BEHAVIORAL HEALTH  
IN NURSING FACILITIES



# HB 23-1228-Audited Financials

- HB 23-1228 contained a requirement for financial oversight:
  - (I) ANNUAL AUDITED FINANCIAL STATEMENTS, PREPARED BY AN INDEPENDENT ACCOUNTANT, FOR A FACILITY, MANAGEMENT COMPANY, AND ANY RELATED PARTY CONDUCTING BUSINESS WITH A MEDICAID-CERTIFIED NURSING FACILITY, INCLUDING AUDITED AND CONSOLIDATED FINANCIAL STATEMENTS FOR ANY PARENT COMPANY THAT ACCEPTS, OR WHOSE SUBSIDIARIES ACCEPT, MEDICAID PAYMENTS FROM THE STATE OF COLORADO;
  - (II) DETAILS ON TRANSACTIONS BETWEEN RELATED PARTIES OR ENTITIES THAT HAVE COMMON OWNERSHIP; AND
  - (III) OWNERSHIP INTEREST IN REAL ESTATE, MANAGEMENT COMPANIES, FACILITY OPERATORS, AND ALL RELATED PARTIES.
- HCPF is looking for feedback on timing (i.e. with cost report?)



# HB 23-1228-Audited Financials

- HCPF- Tentative outline of requirements:



# HB 23-1228-Sustainability plans

- HB 23-1228 contained a requirement for sustainability and innovations plans:
- (15) (a) EACH NURSING FACILITY THAT RECEIVES MEDICAID FUNDS SHALL DEVELOP AND SUBMIT A PLAN TO THE STATE DEPARTMENT THAT MEETS STATE DEPARTMENT STANDARDS AND DEMONSTRATES HOW THE NURSING FACILITY WILL:
  - (I) IMPROVE THE HEALTH AND SAFETY OF THE NURSING FACILITY'S RESIDENTS, INCLUDING INFECTION CONTROL AND STAFFING;
  - (II) INCREASE ACCESS TO CARE;
  - (III) IMPROVE FINANCIAL SUSTAINABILITY, INCLUDING OPPORTUNITIES FOR DIVERSIFICATION OF BUSINESS LINES AND STABILIZATION OF REVENUE STREAMS; AND
  - (IV) PROMOTE INNOVATION TO MEET THE EMERGING NEEDS OF INDIVIDUALS WITH DISABILITIES AND AGING AND OLDER ADULTS
- HCPF is looking for feedback on timing (end of year?)

# HB 23-1228-Sustainability plans

- Give some time to allow impact of rate update before fully defining this. Tentative plan will include:
  - Impact on Wages
  - Examples of Infection control investments
  - Examples of Technology or Innovation investments
  - Etc.

# Fee / Payment Transactions

- July 2023 Transaction
- Cannot implement SFY 23-24 until August SPA Approval
- Transaction equals May 2023 transaction amounts
- Will communicate this to all nursing homes this week



# Fee / Payment Transactions

- **August 2023 Transaction**
- Transactions based on SFY 23-24 Model
- Includes reconciliation for July 2023
  - 1/12th of SFY 23-24 minus July actual
- Transaction included in fee/payment letters provided to nursing homes later this month

# CHOW Process

- Considerable increase in CHOWs over last several years
- CHOWs taking 6+ months to complete
- Previously held fee/payment until CHOW complete
  - Ownership transfer occurred at start of CHOW
- Creates issues for State & nursing homes
  - State Cash Accounting
  - Funds held by State and not nursing homes

# CHOW Process

- **Proposal** - Continue transaction process with prior owner until CHOW process is complete
- Both parties (previous & new owners) receive communications on transactions during CHOW process



# SFY 23-24 iC Reimbursement Rate

- **Calculation** - 10% increase in statewide average iC rate, not 10% in nursing home iC rate
- Not nursing home specific
  - Core Components Rate \* 84.39%
- Two nursing homes incorrectly report cost/utilization data, grossly reducing their Core Components Rate

# SFY 23-24 iC Reimbursement Rate

- **Changes to iC rate calculation**
  - Statewide average iC rate increase from 3% to 10%
  - Greater-of PDPM and RUG (for SFY 23-24 only)

SFY	Average Core Rate	General Fund Limit	Average iC Rate
SFY 22-23	\$ 296.32	3.00%	\$ 251.07
SFY 23-24	\$ 327.25	10.00%	\$ 276.17
# Difference	\$ 30.93	7.00%	\$ 25.10
% Difference	10.44%		10.00%

# SFY 23-24 iC Reimbursement Rate

- **Cannot utilize SFY 23-24 iC rates until 8/16/23**
  - Claims billed during 7/1/23 - 8/15/23 with a DOS 7/1/23 - 8/15/23 will pay using SFY 22-23 iC Rates
  - For claims billed on/after 8/16/23 with a DOS on/after 8/16/23 will pay using SFY 23-24 iC Rates
  - Late August 2023 will mass adjust all previously paid claims with DOS 7/1/23 - 8/15/23

# SFY 23-24 iC Reimbursement Rate

- **Mass Adjustment of Previously Paid Claims**
  - Lower-of pricing methodology
    - (Billed Amount & Calculated Amount)
  - With rate increase through mass adjustment, claim originally paid using lower-of Billed Amount will not pay with new (higher) SFY 23-24 iC rate.
    - *What is Usual & Customary charges utilized by providers?*



# Open Comment