



NC DEPARTMENT OF HEALTH AND HUMAN SERVICES

Overview of NC DHHS Transition of Care Draft Policy, 14

February 18, 2020

Trish Farnham, Senior Health Policy Analyst
Quality & Population Health, NC Medicaid

Garrick Prokos, Project Management Officer
Accenture for Quality & Population Health, NC Medicaid

1

Today's Webinar

- Welcome!
- Goals:
 - To provide attendees with an overview of NC DHHS Transition of Care design.
 - To provide attendees with summary of NC DHHS Transition of Care Policy processes and requirements.
 - To invite feedback on intended design and NC DHHS Transition of Care Policy content.
- Housekeeping:
 - Our goal is to provide an overview, but we welcome questions on anything in the Policy.
 - Invite questions through the chat box function.
 - Questions will be cataloged and included in public comments.

2

Transition of Care:
Foundations for NC DHHS Transition of Care Design

NCDHHS Division of Health Benefits | Overview of NC DHHS Transition of Care Draft Policy, 2/18/2020 3

3

Overall Vision for NC DHHS Transition of Care Design

As beneficiaries move between delivery systems, the Department of Health and Human Services (Department or DHHS) intends to maintain continuity of care for each Member and minimize the burden on providers during the transition.

Resulting Design Priorities:

- Safeguard service and provider continuity for transferring members.
- Establish supports for providers during the transition.

NCDHHS Division of Health Benefits | Overview of NC DHHS Transition of Care Draft Policy, 2/18/2020 4

4

NC DHHS Transition of Care Policy: Driving Design Priorities

- Facilitating Uninterrupted Service Coverage
- Supporting Continuity of Care through Data Transfer
- Clear and Organized Communication Between Entities
- Establishing Additional Safeguards for High Engagement Members
- Member and Provider Education

NCDHHS Division of Health Benefits | Overview of NC DHHS Transition of Care Draft Policy, 2/18/2020 5

5

The NC Transition of Care “Tridge:” Processes established to guide transitions between Plans and Service Delivery Systems

PHP 2



PHP 1

Medicaid Direct

- Enrolling
- Disenrolling
- Tailored Plan eligible

“Tridge” in Midland, Michigan: <https://www.kuriositas.com/2012/01/tridge-michigans-three-way-bridge.html>

NCDHHS Division of Health Benefits | Overview of NC DHHS Transition of Care Draft Policy, 2/18/2020 6

6

Transition of Care: What We Don't Want



7

Transition of Care Design is Inherently Interdisciplinary



8

Transition of Care Dynamics

<i>Crossover Transition of Care</i>	One time crossover of beneficiaries eligible for NC Medicaid Managed Care on “Managed Care Implementation” or “Managed Care Launch” date (formerly 2/1/2020).
<i>Ongoing Transition of Care</i>	Ongoing transition of care for beneficiaries/members moving between PHPs, between PHPs and Medicaid Direct.
<i>Other transition dynamics covered under Policy</i>	Transitions due to Change in Providers. Transitional Care Management requirements.

NCDHHS Division of Health Benefits | Overview of NC DHHS Transition of Care Draft Policy, 2/18/2020 9 9

9

What do some of the terms mean?

NC Medicaid Direct	<ul style="list-style-type: none"> New name for our current Medicaid program. Fee-for-service + LME-MCOs (or PACE) What everyone on Medicaid has now
NC Medicaid Managed Care	<ul style="list-style-type: none"> The term used reference the five “prepaid health plans” or “PHPs” or “health plan” Also called “Standard Plan” or “Standard Plan Option.” Launch date (is referenced as “Managed Care Launch (MCL),” “Managed Care Effective Date” or “Standard Plan Effective Date”
Tailored Plan	<ul style="list-style-type: none"> Specialized plans for members with significant behavioral health needs and intellectual/developmental disabilities “Tailored Plan-eligible” refers to beneficiaries who are eligible for Tailored Plan enrollment, even if currently enrolled in the Standard Plan
Advanced Medical Home (AMH)	<ul style="list-style-type: none"> Under Transformation, the Advanced Medical Home model replaces NC’s current primary care care management (PCCM) model for beneficiaries enrolled in a PHP. While PHPs remain responsible for oversight, care management functions, including Transition of Care care management activities, can be delegated to Tier 3 AMH practices.

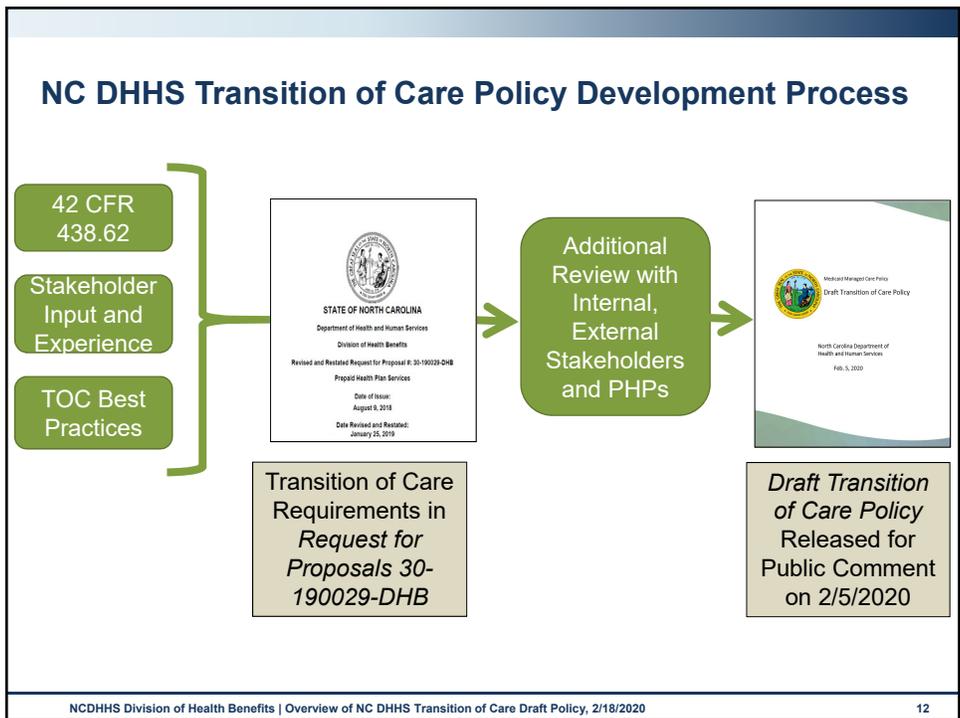
NCDHHS Division of Health Benefits | Overview of NC DHHS Transition of Care Draft Policy, 2/18/2020 10

10

NC DHHS Transition of Care Policy Development Overview

NCDHHS Division of Health Benefits | Overview of NC DHHS Transition of Care Draft Policy, 2/18/2020

11



12

NC DHHS Transition of Care Policy: Scope

- Applies to Prepaid Health Plans (PHPs).
 - NC DHHS works to align TOC practices with other vendors.

Topics Covered by NC DHHS Transition of Care Policy

General Transition of Care Requirements

Safeguards for Transitioning Members who Receive Care Management

Safeguards for Transitioning Members Disenrolling from NC Medicaid Managed Care

Safeguards During a Change in Provider

Transitional Care Management Requirements

Requirements related to Crossover

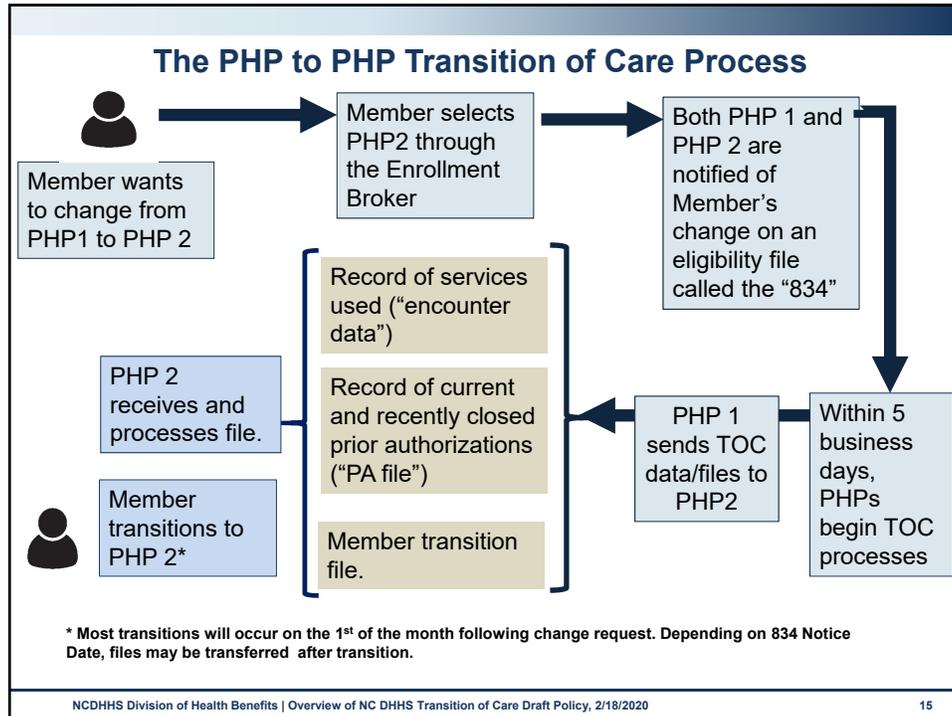
Additional Considerations for Supporting TP eligible Standard Plan Members

13

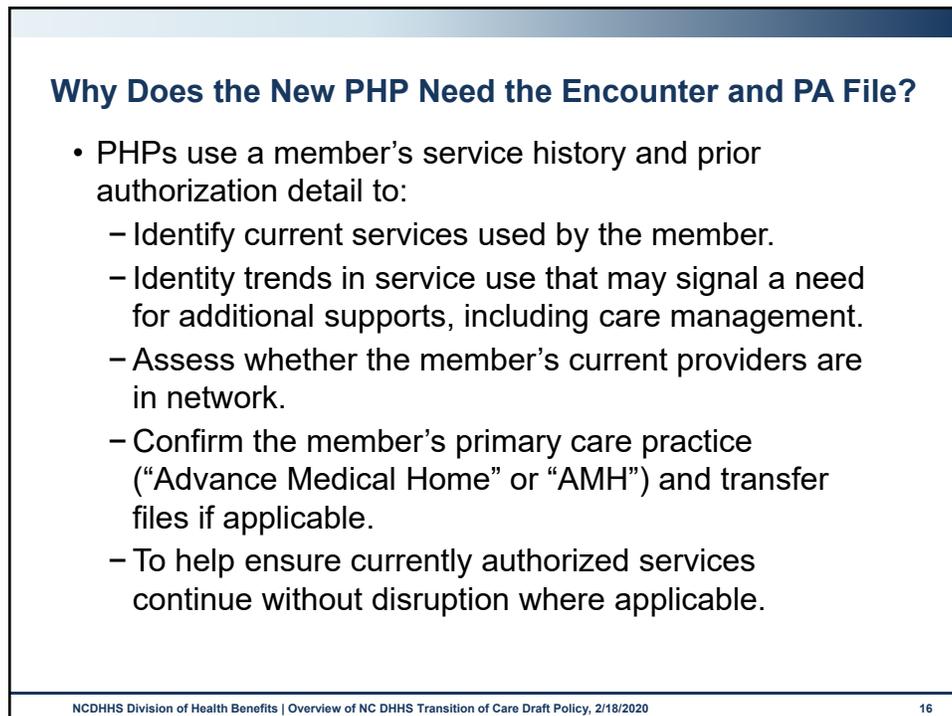
NC DHHS Transition of Care Policy in Light of NC Medicaid Transformation Suspension

- NC Medicaid Managed Care did not go into effect on 2/1/2020.
- NC DHHS has not established a revised launch date.
- With NC Managed Care launch suspended, NC Medicaid will continue to operate under the current fee-for-service model administered by NC DHHS. Nothing will change for Medicaid beneficiaries; they will get health services as they do today. Behavioral health services will continue to be provided by LME-MCOS. All health providers enrolled in Medicaid are still part of the program and will continue to bill the state through NCTracks.
- During Suspension, NC DHHS continues with planning on a reduced scale and on a time-limited basis.
- NC DHHS Transition of Care Policy will not go into effect until revised launch date.

14



15



16

What's in the Transition File?

- Member-specific socio-clinical information required to ensure continuity of care.
- Transition file will minimally include:
 - Most recent care needs screening results
 - List of member's current providers
 - List of member's currently authorized services
 - List of any open adverse benefit determination notices
- Additional content requirements for care managed members and members disenrolling from Standard Plan
 - Care plan (as applicable)
 - Comprehensive assessment outcome (as applicable)
 - Summary of member clinical detail including:
 - Rx list
 - Active diagnoses
 - Known allergies
 - Prescheduled appointments

NCDHHS Division of Health Benefits | Overview of NC DHHS Transition of Care Draft Policy, 2/18/2020 17

17

Additional Safeguards if the Transitioning Member Receives Care Management



PHP Responsibilities When Member who Receives Care Management Transitions.

Warm Handoff
(time-sensitive, member specific, collaborative exchange between entities)

Pre Transition: Promote proactive communication between entities.

Post Transition: Follow up to confirm service continuity.

* Most transitions will occur on the 1st of the month following change request. Depending on 834 Notice Date, files may be transferred after transition.

NCDHHS Division of Health Benefits | Overview of NC DHHS Transition of Care Draft Policy, 2/18/2020 18

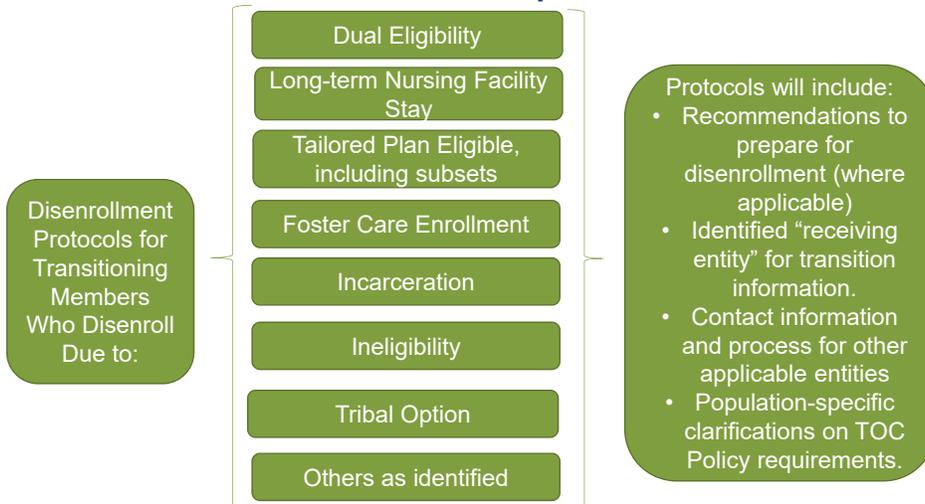
18

Transition of Care: Members Disenrolling from Managed Care

- Legislative requirements exclude or exempt identified populations from participating in Standard Plan.
- A Standard Plan member may become ineligible/exempt for Standard Plan participation upon a change in circumstance:
 - A Medicaid-only Standard Plan member begins receiving Medicare and becomes “Dually eligible.”
 - A child enrolled in the Standard Plan becomes enrolled in the NC Foster Care Program.
 - A Standard Plan member requires skilled nursing facility services for longer than 90 days.
 - A Standard Plan member becomes eligible for Tailored Plan services.
- Disenrolling members will receive enhanced coordination, even if the member does not otherwise receive care management.
 - Preparation for transition (as applicable)
 - Coordinated communication between entities
 - Coordination with necessary assessment entities
- Providers of disenrolling members will also receive enhanced support.

19

Transition of Care: Population-Specific Disenrollment Protocol Development



Reflects protocols to be established prior to revised Managed Care Launch date

20

Additional Continuity of Care Protections within NC DHHS Transition of Care Policy

- Member held harmless by the providers for costs of medically necessary covered services, except applicable cost sharing.
- Member can complete an existing, clinically indicated, authorization period established by their PHP, LME/MCO or fee-for-service entity for service covered by PHP.
- Additional provider continuity protections for members in an Ongoing Course of Treatment* or who have an Ongoing Special Condition,* including minimally a 90 day transitional period and longer for certain clinical circumstances including:
 - pregnancy;
 - scheduled surgery/organ transplantation/inpatient care; and
 - terminal illness.
- Pregnant women may continue to see behavioral health provider without prior authorization.

* Please see NC DHHS Transition of Care Policy definitions and NC.G.S 58-67-88:
https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_58/GS_58-67-88.pdf

NCDHHS Division of Health Benefits | Overview of NC DHHS Transition of Care Draft Policy, 2/18/2020

21

21

Transition of Care Safeguards with Change of Provider

- PHPs work to build robust provider networks and must meet DHHS network adequacy standards.
- However, in the event a provider leaves the PHP network, additional safeguards to preserve continuity apply to members who are in an ongoing course of treatment or have an ongoing special condition.
- PHPs must provide effective notice to members of provider terminations.
 - Notice to all members who have received services within 60 days of termination.
 - Notice within 15 days for non AMH/PCP termination
 - Notices within 7 days for AMH/PCP termination
- Member held harmless for any costs associated in transition of providers, including copying medical records or treatment plans.

* For reasons other than quality or program integrity issues.

NCDHHS Division of Health Benefits | Overview of NC DHHS Transition of Care Draft Policy, 2/18/2020

22

22

Transitional Care Management

- Transitional Care Management is part of the broader Care Management function.
- Framework established in 42 CFR 438.208
- National Transitions of Care Coalition has long identified key structure and process indicators of quality care transitions:
 - Accountable provider/entity at all points of the transition.
 - Plan of Care
 - Use of Health Information Technology (HIT)
 - Use of Care Team Process
 - Communication between providers
 - Protocol of shared accountability in effective transfer of information
 - Patient Education and Engagement

See *Improving Transitions of Care*, National Transitions of Care Coalition:
[https://static1.squarespace.com/static/5d48b6eb75823b00016db708/t/5d49bedcc9ac1b0001863084/1565114092990/PolicyPaper+\(1\).pdf](https://static1.squarespace.com/static/5d48b6eb75823b00016db708/t/5d49bedcc9ac1b0001863084/1565114092990/PolicyPaper+(1).pdf)

NCDHHS Division of Health Benefits | Overview of NC DHHS Transition of Care Draft Policy, 2/18/2020

23

23

Transitional Care Management and Care Transitions

- “Care Transitions:” The process of assisting a Member to transition to a different care setting or through a life stage that results in or requires a modification of services (e.g. school-related transitions).
- PHPs develop methodology for identifying Members who are at risk of readmissions and other poor outcomes, that integrates factors such as:
 - The patient’s severity of condition, medications, risk score and other factors.
 - Frequency, duration and acuity of facility admissions.
 - Discharges of identified high need populations such as from behavioral health facilities or NICU.
 - Level of post-discharge engagement may vary based on circumstance.

NCDHHS Division of Health Benefits | Overview of NC DHHS Transition of Care Draft Policy, 2/18/2020

24

24

PHPs' Transitional Care Management Responsibilities


➔


Transitional Care Management

- ✓ Ensure a care manager is assigned to the transition
- ✓ Outreach to Member's AMH/PCP and other medical providers
- ✓ Facilitate clinical handoffs
- ✓ Obtain discharge plan and ensure reviewed with Member and facility.
- ✓ Ensure follow up outpatient and/or home visit is scheduled within clinically appropriate time window
- ✓ Medication management
- ✓ Rapid follow up after discharge
- ✓ Comprehensive assessment/re-assessment

PHPs are also responsible for accessing admission, discharge and transfer ("ADT") data in real or near real time and implementing a "systemic, clinically appropriate process with designated staffing for responding to certain high-risk ADT alerts."

NCDHHS Division of Health Benefits | Overview of NC DHHS Transition of Care Draft Policy, 2/18/2020 25

25

NC DHHS Transition of Care Policy, Appendix A: Crossover

- Since the original Revised and Restated RFP, NC DHHS has organized and augmented the original member and provider TOC safeguards during the time around NC Medicaid Managed Care launch.
- These Crossover Requirements are outlined in Appendix A.
- Topics include:
 - Data transfer requirements
 - Management of High Need Member Supports and Services
 - Non Emergency Medical Transportation
 - Prior Authorization processing
 - Payment for Services
 - Special Considerations for Adverse Determinations and Appeals
 - Member Education
 - Other requirements

For Transition of Care Crossover Presentation, please see *MCT 114 NC's Transition to Medicaid Managed Care*: <https://medicaid.ncdhhs.gov/providers/provider-playbook-medicare-managed-care/provider-playbook-training-courses#mct-114:-nc%E2%80%99s-transition-to-managed-care:-crossover>

NCDHHS Division of Health Benefits | Overview of NC DHHS Transition of Care Draft Policy, 2/18/2020 26

26

NC DHHS Transition of Care Policy, Appendix B: Special Considerations for Supporting Members Who May Meet Tailored Plan Criteria

For additional information about Tailored Plan Eligibility: Please see NC Medicaid Provider Playbook -

<https://medicaid.ncdhhs.gov/providers/provider-playbook-medicaid-managed-care/provider-playbook-training-courses>

- Appendix B reinforces and clarifies expectations for supporting Tailored Plan-eligible (“TP-eligible”) members through transitions between service delivery systems.
- Establishes TP-eligible members “who remain in or return to the Standard Plan shall be designated by the PHP as Priority Population for Care Management under the Adults and Children with Special Healthcare Needs category.”

Full link to NC Medicaid Provider Playbook: <https://medicaid.ncdhhs.gov/providers/provider-playbook-medicaid-managed-care/provider-playbook-training-courses>

NCDHHS Division of Health Benefits | Overview of NC DHHS Transition of Care Draft Policy, 2/18/2020

27

27

Requesting Public Comment

- NC DHHS Transition of Care Policy is considered a draft and will likely be refined based on feedback received prior to revised NC Managed Care launch date.
- Just as a reminder, the NC DHHS Transition of Care Policy draft (<https://files.nc.gov/ncdhhs/NC-DHHS-Transition-of-Care-Draft-POLICY-v14-for-Public-Comment-20200205.pdf>) is posted on Transition of Care webpage (<https://medicaid.ncdhhs.gov/transformation/care-management/transition-care>)
- Please provide feedback on:
 - If Policy requirements align with DHHS TOC Vision and design priorities of:
 - Establish safeguards of service and provider continuity for transferring members.
 - Establish supports for providers during the transition.
 - Areas that require additional clarification or development.
- The Department welcomes feedback on the policy at Medicaid.Transformation@dhhs.nc.gov by March 6, 2020.
- For more information, visit the Transition of Care webpage: <https://medicaid.ncdhhs.gov/transformation/care-management/transition-care>.
- Thank you!

NCDHHS Division of Health Benefits | Overview of NC DHHS Transition of Care Draft Policy, 2/18/2020

28

28