



State of California—Health and Human Services Agency
Department of Health Care Services
CalAIM Enhanced Care Management (ECM) and
In Lieu of Services (ILOS)
Model of Care Template: Instructions and Timelines



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Overview

The Enhanced Care Management (ECM) and In Lieu of Services (ILOS) Model of Care (MOC) is each managed care plan's (MCP) framework for providing ECM and ILOS. Each MCP's MOC will include its overall approach to ECM and ILOS; its detailed Policies and Procedures with regard to ECM and ILOS Provider (including non-traditional Providers) contracting and oversight; its ECM and ILOS Provider network capacity; and the contract language that will define key aspects of its arrangements with its ECM and ILOS Providers. The MOC also includes specific "Transition and Coordination" content for MCPs operating in Whole Person Care (WPC) and/or Health Home Program (HHP) counties. MCPs in these counties must describe how they will ensure smooth transitions for their Members from WPC and HHP into ECM and ILOS.

In order to balance statewide consistency with the ability of MCPs to innovate in their design of ECM and of ILOS they elect to offer, DHCS is standardizing certain design aspects of ECM and ILOS, while allowing MCPs the flexibility to develop Policies and Procedures that will best meet the needs of their Members and communities. The standardized requirements for ECM and ILOS are found in the MCP Contract section on ECM and ILOS and in the Standard Provider Terms and Conditions. The structure of the MOC Template mirrors the MCP Contract section on ECM and ILOS, and MCPs should refer to the Contract as they develop their MOCs. The combination of the elements contained in the MOC will make up the ECM and ILOS model that will be reflected in each MCP's contracts with ECM and ILOS Providers (see Figure 1).



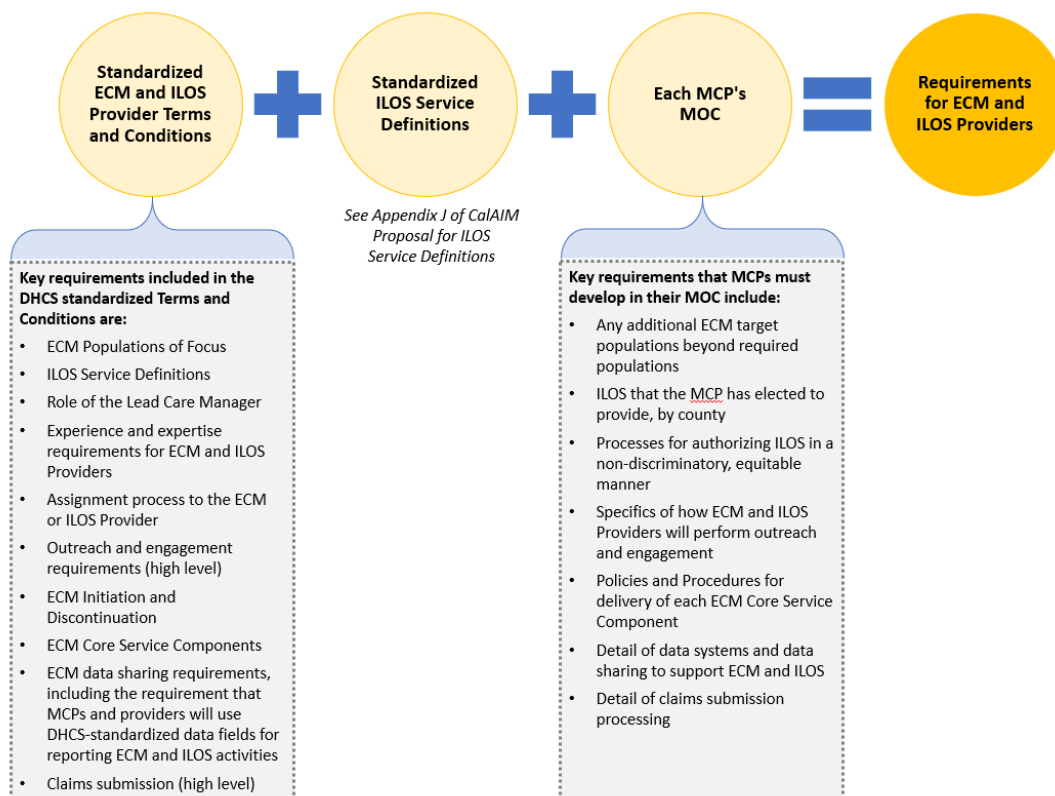
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Figure 1: Elements of ECM and ILOS Provider Requirements



DHCS will use each MCP's MOC submission to determine its readiness to meet ECM and ILOS requirements. MCPs must lay out their MOCs using the DHCS-developed standard template (MOC Template) and submit them to DHCS for review and approval prior to initial ECM and ILOS implementation in 2022. MCPs must make updates to their MOCs (1) ahead of new ECM Populations of Focus being implemented in January and July 2023 and (2) to reflect any ILOS changes.

The ECM and ILOS Implementation timeline is provided in Figure 2 below. MOC submission requirements are provided in Figures 3 and 4 below. MCPs should refer to these detailed timelines to understand how MOC submission timelines relate to the statewide rollout of ECM and ILOS.

DHCS will continue to provide Technical Assistance to MCPs as they prepare for ECM and ILOS implementation, including webinars, FAQs and close engagement with the MCP associations. DHCS publishes all programmatic updates and guidance related to



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ECM and ILOS on the ECM and ILOS [website](#). MCPs may submit questions to DHCS at CalAIMECMILOS@dhcs.ca.gov with Contract Managers cc'd at any time.

DHCS reserves the right to make updates to these instructions and timelines. Any changes will be published on the ECM and ILOS website.

ECM and ILOS Implementation Timelines

ECM will go live on a phased timeline as described below. ILOS are optional for all MCPs to implement beginning 1/1/2022 (see Figure 2).



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Figure 2. ECM and ILOS Implementation Timeline

Date	Health Home Program (HHP) Counties	Whole Person Care (WPC) Pilot Counties	Counties with Neither
<p>January 1, 2022</p>	<ul style="list-style-type: none"> Transition and automatically authorize ECM for all Members of ECM Populations of Focus who are enrolled in or are in the process of being enrolled in HHP ECM goes live for all of the following ECM Populations of Focus: <ul style="list-style-type: none"> Individuals & Families Experiencing Homelessness; High Utilizer Adults; Adults with SMI/SUD. <p><i>To ensure no interruption in service, children and youth currently served by HHP or WPC will be transitioned into ECM and reassessed.</i></p>	<ul style="list-style-type: none"> Transition and automatically authorize all Members enrolled in a WPC Pilot who are identified by the WPC Lead Entity as belonging to an ECM Population of Focus ECM goes live for all of the following ECM Populations of Focus: <ul style="list-style-type: none"> Individuals & Families Experiencing Homelessness; High Utilizer Adults; Adults with SMI/SUD; Adults & Children/Youth Transitioning from Incarceration.¹ <p><i>To ensure no interruption in service, children and youth currently served by HHP or WPC will be transitioned into ECM and reassessed.</i></p>	
<p>MCPs in all counties are able to offer ILOS</p>			

¹ In WPC Pilot counties only: where the services provided in the Pilot are consistent with those described in the ECM Contract.



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Figure 2 Continued. ECM and ILOS Implementation Timeline

Date	Health Home Program (HHP) Counties	Whole Person Care (WPC) Pilot Counties	Counties with Neither
July 1, 2022			<ul style="list-style-type: none"> • ECM goes live for the following ECM Populations of Focus: <ul style="list-style-type: none"> ○ <i>Individuals & Families; Experiencing Homelessness;</i> ○ <i>High Utilizer Adults;</i> ○ <i>Adults with SMI/SUD.</i>
	MCPs in all counties may elect to offer additional ILOS		
January 1, 2023	<ul style="list-style-type: none"> • ECM goes live for the following ECM Populations of Focus: <ul style="list-style-type: none"> ○ <i>Individuals Transitioning from Incarceration (adults and children/youth);</i> ○ <i>Members Eligible for LTC and at risk of Institutionalization;</i> ○ <i>Nursing Home Residents transitioning to community.</i> 		
	MCPs in all counties may elect to offer additional ILOS		
July 1, 2023	<ul style="list-style-type: none"> • ECM goes live for <i>all other Children and Youth.</i> 		
	MCPs in all counties may elect to offer additional ILOS		



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Timelines for MOC Submission

MCPs must submit the MOC to DHCS for review and approval according to the MOC submission schedules provided below in Figure 3 (for WPC and HHP counties and Figure 4 (for All Other counties). Submission Due Dates for the 2023 Go-Live dates are subject to change.

Figure 3. MOC Submission Schedule for MCPs in WPC/HHP Counties

ECM and ILOS Content	MOC Submission Due Dates	
<ul style="list-style-type: none"> • ECM Populations of Focus: <ul style="list-style-type: none"> ○ Homeless; ○ High Utilizer adults; ○ Adults with SMI/SUD; ○ Adults Transitioning from Incarceration¹ • ILOS 	MOC Part 1	July 1, 2021
	MOC Part 2	September 1, 2021
	MOC Part 3	October 1, 2021
<ul style="list-style-type: none"> • Any updates to ECM or ILOS submissions (as needed only) 	MOC Parts 1 and 2	January 1, 2022
	MOC Part 3	March 1, 2022
<ul style="list-style-type: none"> • ECM Populations of Focus: <ul style="list-style-type: none"> ○ Individuals Transitioning from Incarceration; ○ Members Eligible for LTC and at risk of institutionalization; ○ Nursing Home Residents transitioning to community. • Any changes to ILOS 	MOC Parts 1 and 2	July 1, 2022
	MOC Part 3	September 1, 2022
<ul style="list-style-type: none"> • All other Children/Youth ECM Populations of Focus • Any changes to ILOS 	MOC Parts 1 and 2	January 1, 2023
	MOC Part 3	March 1, 2022

¹ In WPC Pilot counties only: where the services provided in the Pilot are consistent with those described in the ECM Contract.



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Figure 4. MOC Submission Schedule for All Other Counties

ECM and ILOS Content	MOC Submission Due Dates	
<ul style="list-style-type: none"> • ILOS Only 	MOC Part 1	July 1, 2021
	MOC Part 2	October 1, 2021
<ul style="list-style-type: none"> • ECM Populations of Focus: <ul style="list-style-type: none"> ○ Homeless; ○ High Utilizer adults; ○ Adults with SMI/SUD. • Any changes to ILOS 	MOC Parts 1 and 2	January 1, 2022
	MOC Part 3	March 1, 2022
<ul style="list-style-type: none"> • ECM Populations of Focus: <ul style="list-style-type: none"> ○ Individuals Transitioning from Incarceration; ○ Members Eligible for LTC and at risk of institutionalization; ○ Nursing Home Residents transitioning to community. • Any changes to ILOS 	MOC Parts 1 and 2	July 1, 2022
	MOC Part 3	September 1, 2022
<ul style="list-style-type: none"> • All other Children/Youth ECM Populations of Focus • Any changes to ILOS 	MOC Parts 1 and 2	January 1, 2023
	MOC Part 3	March 1, 2022



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DHCS MOC Approval Process

MCPs should expect review of the MOC to be an iterative process with DHCS during each review period, and DHCS may require resubmission of certain questions or additional material to ensure alignment with DHCS requirements. DHCS will review and provide feedback on the MOC submissions using DHCS' deliverable review process. If the MOC is approved, DHCS will issue final approval no later than 30 days prior to each go-live date. DHCS may meet with each MCP to gauge the development of the MCP's ECM and ILOS Provider capacity.

For MCPs in WPC and HHP counties, DHCS will pay special attention to appropriate transition of Members into ECM and will closely monitor any MCP decisions not to transition existing WPC/HHP services into the corresponding pre-approved ILOS. DHCS will also closely monitor for any concerns about contracting with existing WPC Lead Entities and Community-Based Care Management Entities (CB-CMEs), as is required in the Contract unless exceptional circumstances apply.

After statewide implementation of ECM and ILOS for all Populations of Focus, DHCS will no longer require updates to the MOC Template and will monitor MCPs' implementation using encounter data and supplementary data reporting. Any revisions to the MCP's approved s Procedures must be submitted to DHCS, using the standard deliverables submission process, for review and approval at least 60 days prior to implementation.

Additional MOC Submission Guidance

Transition and Coordination Planning for WPC and HHP Counties. Consistent with the CalAIM Proposal, MCPs operating in WPC and HHP counties must submit a "Transition and Coordination Plan" to DHCS that demonstrates how the MCP will transition existing programs into ECM and ILOS.² The Transition and Coordination Plan is incorporated in the MOC Template, and relevant questions are labeled "Transition and Coordination Questions for MCPs operating in WPC and HHP counties." MCPs that are not currently operating in WPC and HHP counties should not answer these questions.

- The Excel spreadsheets due in **Part 1** are intended to show which current WPC LE and HHP CB-CME Providers that could transition to serve as contracted ECM or ILOS Providers. The submission of this template is intended to provide DHCS with a status update on MCP ECM and ILOS Provider Network/capacity development in July 2021. For all WPC LE and HHP CB-CME Providers identified as not transitioning to ECM or ILOS Provider status, ('No' status),

² Revised CalAIM Proposal. Available at <https://www.dhcs.ca.gov/provgovpart/Documents/CalAIM-Proposal-Updated-1-8-21.pdf>.



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MCPs will be required to submit an exception request in alignment with Section 6 of the Contract.

- A refresh of the information will be required to be submitted to DHCS as a component of **Part 2** submission to show updates to Provider contracting status that was initially reported as a 'To Be Determined'. For all Providers identified as not transitioning ('No' status), MCPs will be required to submit an exception request in alignment with Section 6 of the Contract.
- The Final ECM and ILOS Provider Network/ capacity will be submitted as **Part 3** of the transition process.
- **How MCPs Should Group Information by County.** MCPs that operate in more than one county should submit a single MOC Template covering ECM and ILOS across all counties in their service area. Some questions specifically prompt the MCP to provide responses by county. Even if not prompted, other variations by county should be noted within the MOC. If details vary substantially between counties, MCPs may submit multiple responses to questions or sections of the MOC Template, clearly labeled by county. In Part 2, all Provider capacity information for ECM and ILOS should be provided by county as indicated in the instructions.
- **Subcontractors and Delegated Arrangements.** The MOC Template takes into account delegated arrangements between MCPs and other entities (including partner MCPs, independent physicians associations (IPAs) and management services organizations (MSOs)). MCPs may subcontract with other entities to administer ECM and ILOS, within the guidelines described in the ECM and ILOS Contract; see DHCS-MCP ECM and ILOS Contract Template: 16. Delegation of ECM to Subcontractor(s). All MCPs directly contracted with DHCS are responsible for ECM and ILOS implementation in accordance with DHCS' requirements, including for the compliance of subcontracted entities to which the MCP has delegated responsibility for ECM and ILOS. Each MCP directly contracted with DHCS is responsible for completing and submitting the MOC Template. Within their MOC Template responses, MCPs should include details of subcontracted and delegated arrangements, including in their Policies and Procedures, as they relate to the implementation of ECM and ILOS, and clearly describe how roles and responsibilities will be divided between and among the MCP and subcontractors or delegates.

Instructions for MOC Submission

To complete the ECM and ILOS MOC Template, copy and paste all questions into a separate Word document and complete with your responses. MCPs may use separate attachments, clearly labeled, as necessary. When complete, MCPs should email their



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completed MOC, along with attachments (clearly labeled), to
CalAIMECMILOS@dhcs.ca.gov. MCPs should submit any questions on the MOC process
to DHCS using the same email address.