

# California Advancing and Innovating Medi-Cal (CalAIM) Justice-Involved Advisory Group

*Update on CalAIM Justice Involved Go-Live Dates*

*Thursday, December 1, 2022*

*10:30 – 11:30 AM PST*

# Housekeeping Guidelines

*In order to keep the Advisory Workgroup meeting focused, productive, and efficient:*



Chat function will be disabled for all public participants; Advisory Group members are asked to only use chat functions to request technical support.



All participants will be muted throughout the course of the presentation.



Advisory Workgroup members should raise their hand if they have a question or comment during the designated discussion periods, and DHCS will facilitate conversation.



Members of the public should email questions and comments to [CalAIMJusticeAdvisoryGroup@dhcs.ca.gov](mailto:CalAIMJusticeAdvisoryGroup@dhcs.ca.gov).

# Agenda

## » **Update on CMS Negotiations and Go-Live Dates**

- » Pre-Release Medi-Cal Application Mandate: 1/1/2023
- » Update on PATH Round 2 Funding
- » Implementation of 90 Days Pre-Release Services and Behavioral Health Linkages
- » ECM for Justice-Involved Go-Live

## » **Advisory Group Members' Questions and Comments**

## » **Next Steps**

# Pre-Release Medi-Cal Application Mandate: 1/1/2023

All correctional facilities (e.g., CDCR, county jails, and youth correctional facilities (YCF)) must implement a pre-release Medi-Cal application process by January 1, 2023.

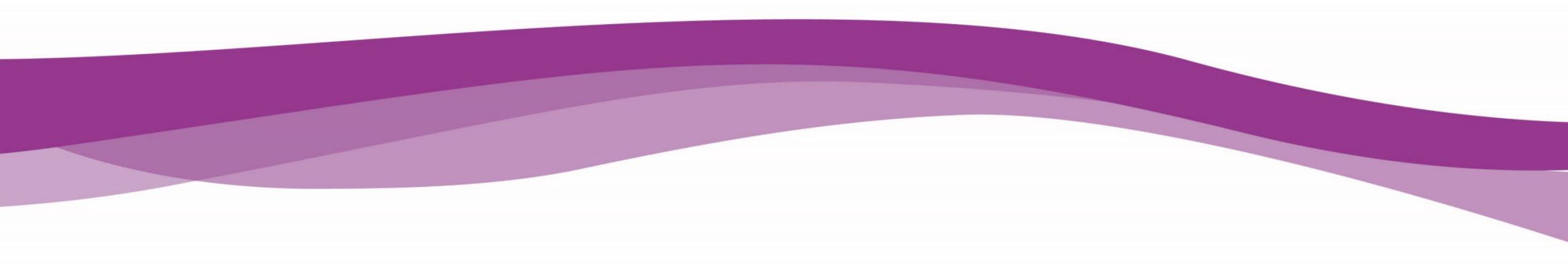
The pre-release application process will help ensure justice-involved individuals have Medi-Cal coverage upon reentry into the community in order to facilitate access to needed Medi-Cal covered services. Establishing a pre-release application process is foundational to providing Medi-Cal services in the 90 days pre-release.

## ***2021 Amendment to the California Penal Code Section 4011.11 Pre-Release Medi-Cal Application Process***

- By January 1, 2023, the board of supervisors in each county, in consultation with the county sheriff, shall designate an entity or entities to assist both county jail inmates and juvenile inmates with the Medi-Cal application process.

DHCS meets monthly with stakeholders to provide technical assistance on implementing pre-release Medi-Cal application processes. For more information on best practices, see the issue brief titled [\*Strategies for Conducting Pre-Release Medi-Cal Enrollment in County Jails and Youth Correctional Facilities\*](#).

# Update on PATH Round 2 Funding





# DHCS Has Been Actively Working with Its Implementation Partners

Over the past year, DHCS has been meeting frequently with implementation partners to inform the development of policy and operational guidance for implementing pre-release services. In addition to Advisory Group meetings, DHCS has regularly met with:

- CDCR/California Correctional Health Care Services (CCHCS) which delivers health care services in State prisons
- County Jails (through CalSheriff meetings, pre-release application sub-working group, and 1:1 meetings)
- CPOC/County Youth Correctional Facilities
- Board of State and Community Corrections (BSCC)
- County Welfare Directors Association (CWDA)
- County Social Service Departments (SSDs)
- County Behavioral Health Department (including working group of county behavioral health directors)
- Council on Criminal Justice and Behavioral Health (CCJBH)
- Reentry Providers (including TCN, STOP, Healthright360, WestCare, and Amity Foundation)

# Update on CMS Negotiations and Go-Live Dates

- » **Implementation of pre-release services is dependent on CMS approval of the DHCS 1115 Waiver request.** Negotiations with CMS on the waiver began in Fall 2021 and are ongoing.
- » Due to the delay in approval of California's 1115 Waiver, the complexity of the policy proposal, and the need to work through operational requirements, the **originally planned launch date of CalAIM Justice-Involved Pre-Release Services on July 1, 2023, is not likely viable.**
- » **DHCS is working towards a waiver approval from CMS either in late December 2022 or early January 2023.**
  - DHCS will endeavor to release operational guidance and PATH funding within three months after CMS approval.
  - DHCS understands that it may take at least 12 months from receipt of PATH funds for correctional facilities to build the necessary infrastructure and processes to implement pre-release services.
- » **DHCS is reevaluating the go-live date for implementation of 90 Days pre-release services and plans to implement a "no sooner than" date during the first half of 2024.**
  - Correctional facilities will have the ability to select their go-live date within a 24-month phase-in period to implement pre-release services.
  - Individual facilities launch dates would be informed by the readiness review process that DHCS will outline for all facilities to meet for purposes of the implementation date. See appendix for more detail on the proposed approach for readiness review.

# Readiness Focus Area #1: Medi-Cal Application Processes

Pre-Decisional Draft



Focused on processes to screen for Medi-Cal eligibility and current enrollment and support individuals in applying for coverage, in coordination with the county social services department (SSD).

## Readiness Elements

- ☑ **Screening** process and support model to screen for current Medi-Cal enrollment and eligibility in coordination with County SSD.
- ☑ **Application support** process to support individuals in applying for Medi-Cal coverage and submitting an application.
- ☑ **Unsuspension** process and data sharing capability to notify the SSD of the individual's release to reactivate coverage

Note: all elements in this focus area are minimum requirements.

### Screening and application timelines will vary based on facility type:

- » **County jails and youth correctional facilities** will be expected to implement processes that begin at or close to intake.
- » **State prisons** will be expected to begin pre-release enrollment prior to 135 days pre-release in order to ensure eligible individuals have applications completed in time to receive the full 90 days of service.

# Readiness Focus Area #2: 90-Day Pre-Release Access Screening

Pre-Decisional Draft



Focused on processes to screen individuals for 90-day pre-release service eligibility and sharing information with the SSD that the individual met the access criteria in order to activate the pre-release services aid code.

## Readiness Elements

- ☑ **Screening** process and support model to screen for eligibility for 90-day pre-release services.
- ☑ **Eligibility notification to County SSD** with a list of individuals who are eligible/ineligible for 90-day pre-release services so that the SSD can activate the aid code that will allow providers to bill Medi-Cal for pre-release services.
- ☑ **Release notification to County SSD** with a list of individuals who are released from custody.

Note: all elements in this focus area are minimum requirements.

## Pre-release service access screening process timelines will vary based on facility type.

- » **County jails and youth correctional facilities** will be expected to implement processes at or close to in-take, along with Medi-Cal application processes.
- » **State prisons** will be expected to begin pre-release access criteria screening as early as 210 days prior to release.
- » **All correctional facilities** will need to have processes in place to document if a patient qualifies for pre-release services within their applicable data systems (e.g., electronic health record system).
  - » *Best Practice:* Leverage facility data to flag individuals who are incarcerated multiple times within 12 months and have previously qualified for pre-release services to expedite their enrollment.

# Readiness Focus Areas #3-5: Service Delivery, Re-Entry Planning, and Oversight

Pre-Decisional Draft



Other readiness focus areas will address pre-release service delivery, re-entry planning and coordination (including warm handoffs to post-release providers), and program oversight and project management.

**Readiness Elements** (\*indicates that the element is a Minimum Requirement)



## #3. Pre-Release Service Delivery

- ✓ **\*Pre-release care manager assignment** process using the ECM JI provider directory
- ✓ **Consultation scheduling process and support** for in-person or virtual consultations
- ✓ **\*Support for medications and MAT** during pre-release
- ✓ **\*Support for medications** upon release
- ✓ **Support for DME** upon release
- ✓ **\*Medi-Cal billing** to support provider billing for pre-release services



## #4. Re-Entry Planning and Coordination

- ✓ **\*Release date notifications** to the individual's stakeholders, including care managers and managed care plan
- ✓ **\*Re-entry care management warm handoff** to post-release care manager, if different from pre-release care manager
- ✓ **\*Re-entry behavioral health warm handoff** to post-release behavioral provider or health care manager, if different from pre-release provider or care manager



## #5. Oversight and Project Management

- ✓ **\*Staffing structure and plan** to support each readiness element and ongoing compliance
- ✓ **Governance structure for partnership collaboration** (e.g., SSD, service providers, care management organizations)
- ✓ **\*Reporting and oversight processes** to collect, monitor and report on DHCS required measures (*additional information forthcoming*)

# Summary: Correctional Agency Readiness Assessment Structure

This slide and the subsequent slide provide an overview of the readiness elements within each focus area, which will be framed as questions for correctional agencies to respond to describe the general readiness, capabilities, and infrastructure of their facilities.

Focus Areas	Readiness Element	Minimum Requirement for Pass or Conditional Pass?
<b>1: Medi-Cal Application Processes</b>	1a: Screening	Minimum Requirement
	1b: Application Support	Minimum Requirement
	1c: Unsuspension	Minimum Requirement
<b>2: 90 Day Pre-Release Eligibility Screening</b>	2a: Screening	Minimum Requirement
	2b: Eligibility Notification to County SSD	Minimum Requirement
	2c: Release Notification to County SSD	Minimum Requirement
<b>3: 90 Day Pre-Release Service Delivery</b>	3a: Pre-release Care Manager Assignment	Minimum Requirement
	3b: Consultation Scheduling	
	3c: Virtual/In-Person Consultation Support	
	3d: Support for Medications	
	3e: Support for Medication Assisted Treatment	Minimum Requirement
	3f: Support for Prescriptions Upon Release	Minimum Requirement
	3g: Support for Durable Medical Equipment Upon Release	
	3h: Medi-Cal Billing	Minimum Requirement

# Summary: Correctional Agency Readiness Assessment Structure

*(continued)*

*Pre-Decisional Draft*

Focus Areas	Readiness Element	Minimum Requirement for Pass or Conditional Pass?
<b>4: Re-Entry Planning and Coordination</b>	4a: Release Date Notification	Minimum Requirement
	4b: Re-Entry Care Management Warm Handoff	Minimum Requirement
	4c: Re-Entry Behavioral Health Warm Handoff	Minimum Requirement
<b>5: Oversight and Project Management</b>	5a: Staffing Structure and Plan	Minimum Requirement
	5b: Governance Structure for Partnerships	
	5c: Reporting and Oversight Processes	Minimum Requirement

- » Elements flagged as Minimum Requirement indicates that the correctional agency must have the capability in place in order to go live with pre-release services.
- » Elements that are not flagged as Minimum Requirements must still be supported, but DHCS may use discretion when reviewing these elements to determine whether an agency is ready to go live.

# Update on Behavioral Health Linkages and ECM Justice Involved Population of Focus

» **Behavioral Health Linkage requirements will go live with pre-release services.**

» DHCS is in the process of finalizing Behavioral Health Linkage requirements for correctional facilities, county behavioral health departments, care managers, and managed care plans. DHCS will provide additional information once available

» **DHCS is reconsidering when ECM for the Individuals Transitioning from Incarceration POF will go-live. A formal date will be provided in early 2023.**

» ECM for individuals and families experiencing homelessness, adult high utilizers, and adults with a SMI/SUD is currently available.

» ECM went live to support existing referral pathways and maintain infrastructure for the JI POF in the 17 counties that operated a Whole Person Care pilot serving JI populations in January 2022



# Thank you

Please send questions and comments to  
[CalAIMJusticeAdvisoryGroup@dhcs.ca.gov](mailto:CalAIMJusticeAdvisoryGroup@dhcs.ca.gov)

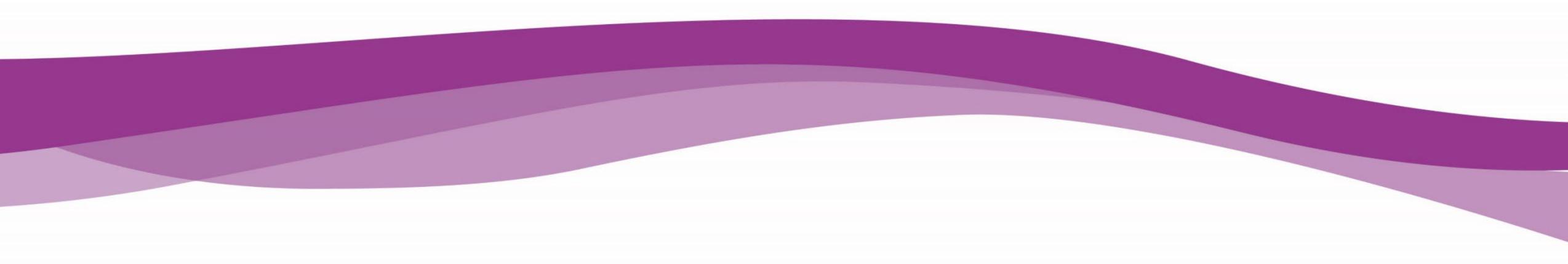
# Public Health Emergency (PHE) Unwinding

- » **The COVID-19 PHE will end soon and millions of Medi-Cal beneficiaries may lose their coverage.**
- » **Top Goal of DHCS:** Minimize beneficiary burden and promote continuity of coverage for our beneficiaries.
- » **How you can help:**
  - » Become a **DHCS Coverage Ambassador**
  - » Download the Outreach Toolkit on the [DHCS Coverage Ambassador webpage](#)
  - » [Join the DHCS Coverage Ambassador mailing list](#) to receive updated toolkits as they become available

# DHCS PHE Unwind Communications Strategy

- **Phase One: Encourage Beneficiaries to Update Contact Information**
  - **Launch immediately**
  - Multi-channel communication campaign to encourage beneficiaries to update contact information with county offices.
    - » Flyers in provider/clinic offices, social media, call scripts, website banners.
- **Phase Two: Watch for Renewal Packets in the mail. Remember to update your contact information!**
  - **Launch 60 days prior to COVID-19 PHE termination.**
  - Remind beneficiaries to watch for renewal packets in the mail and update contact information with county office if they have not done so yet.

# Appendix

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# Reminder: Correctional Agency and Facility Requirements

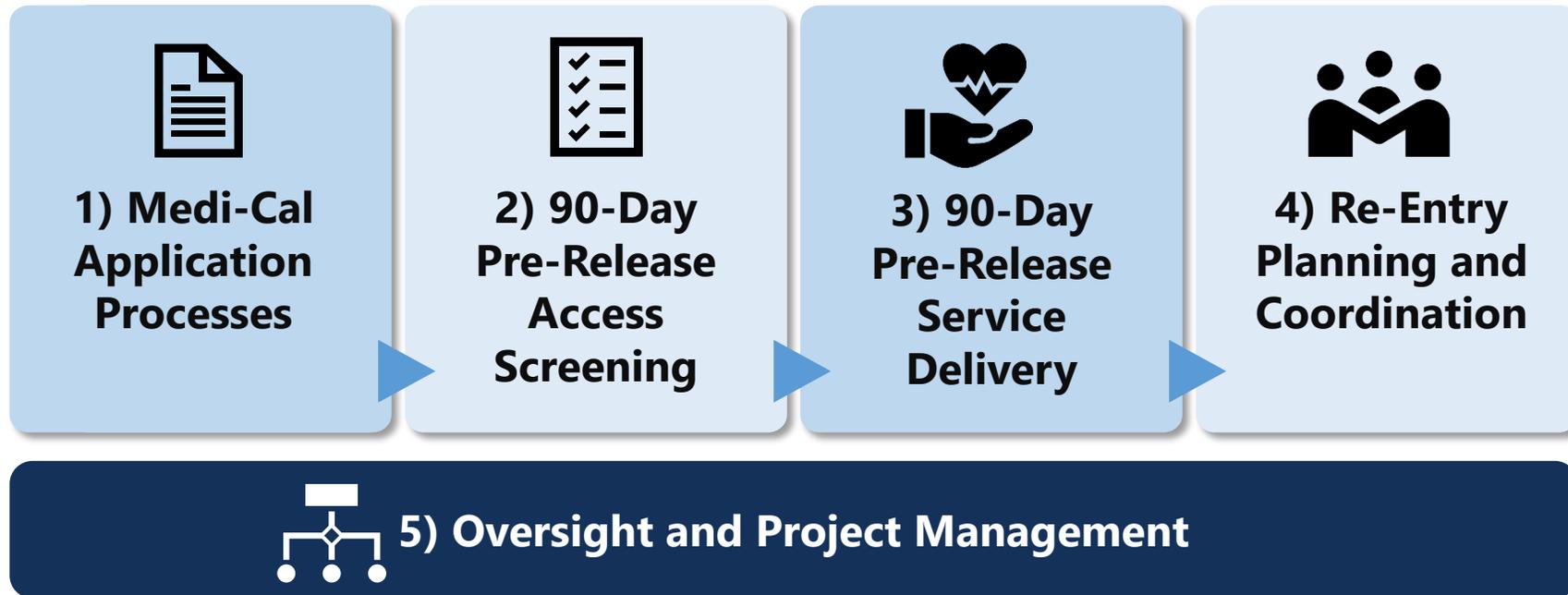
**Correctional agencies and facilities are statutorily mandated to comply with the CalAIM pre-release service requirements per California Welfare and Institutions Code §14184.800 and in accordance with correctional facilities' obligations to provide medically necessary care to justice-involved individuals.**

- » As part of the pre-release service standard terms and conditions (STCs) currently being negotiated with the Center on Medicare and Medicaid Services, all prisons, jails and youth correctional facilities will be required to demonstrate readiness to participate in the justice-involved initiative prior to going live with pre-release services.
- » DHCS will work with agencies to ensure they are able to meet readiness by the above dates and will require agencies to provide ongoing reporting on their progress in achieving and maintaining readiness.
- » If a correctional agency does not meet full readiness on a key focus area, the correctional agency either receives a "conditional pass" subject to the resolution of a corrective action plan (CAP) to resolve the deficiency, in which case they can still go live with the CAP, or they "fail" on a key focus area.
- » If they fail, then DHCS is exploring the ability to exercise compliant enforcement mechanisms.
- » Additionally, SSDs will be required to complete a brief readiness assessment process to demonstrate readiness to ensure that they are able to support correctional facilities as they go-live with 90-day pre-release services.

# Readiness Assessment Approach

As part of the pre-release service standard terms and conditions (STCs) currently being negotiated with the Federal Government, all prisons, jails and youth correctional facilities will be required to demonstrate readiness to participate in the justice-involved initiative prior to going live with pre-release services.

DHCS will launch a readiness assessment process that will focus on five key areas needed to operationalize 90-day pre-release services:



*Note: An abbreviated readiness process will also be established for County social service departments to ensure eligibility and enrollment processes facilitate pre-release services.*



# Readiness Assessment Submission Process

- **Readiness assessments will be completed at the agency level** on behalf of all facilities and will be based on agency attestations of readiness.
- **Facilities will leverage PATH dollars to support the planning activities** necessary to demonstrate readiness.
- **Agencies will submit their readiness assessments across all five readiness focus areas at least five months prior to their go-live date.**
  - **Some readiness assessment elements within the focus areas are categorized as Minimum Requirements**, indicating that the correctional agency must have the capability in place in order to go-live with pre-release services. Elements that are not flagged as Minimum Requirements must still be supported, but DHCS may use discretion when reviewing these elements to determine whether an agency is ready to go-live.
- **DHCS' JI team will lead the readiness assessment and evaluation process** using a structured scoring rubric organized around *Pass*, *Conditional Pass*, and *Fail* grades.
  - Focus on 5 key areas (*more information on next slides*)
  - Facilities that receive a *Pass* grade, or in some circumstances a *Conditional Pass* grade, will begin to go live on the go-live date or the first day of the following quarter.

# Readiness Focus Area #1: Medi-Cal Application Processes

*Pre-Decisional Draft*



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## Readiness Elements

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# Readiness Focus Areas #3-5: Service Delivery, Re-Entry Planning, and Oversight

*Pre-Decisional Draft*



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**Readiness Elements** (\*indicates that the element is a Minimum Requirement)

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# Summary: Correctional Agency Readiness Assessment Structure

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*Pre-Decisional Draft*

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» Elements flagged as Minimum Requirement indicates that the correctional agency must have the capability in place in order to go live with pre-release services.

» Elements that are not flagged as Minimum Requirements must still be supported, but DHCS may use discretion when reviewing these elements to determine whether an agency is ready to go live.

# Readiness Submission Process

DHCS will release a readiness tool that correctional agencies will populate to attest to their readiness across each focus area.

- **Agencies will attest to readiness through DHCS-provided readiness assessment templates.**
  - To streamline the process, agencies may leverage information from their PATH JI Capacity Building Program progress reports to populate relevant sections of the readiness assessment.
  
- **Agencies must submit all their information at least five months prior to their proposed go-live date (see timeline).**
- **DHCS recognizes that some agencies may not have all the required capabilities in place** for all five focus areas (and/or for all their facilities) at the time of submitting their readiness assessment.
  - In these instances, agencies will be asked to describe their plan for achieving readiness by (or shortly after) the planned go-live date.

# DHCS Evaluation Approach

*Pre-Decisional Draft*

- **DHCS will determine a score based on the correctional agency's attestation of their readiness in each focus area** (see Scoring Rubric on next slide).
- For approval to go-live with pre-release services, **a correctional agency must receive a "Pass" or a "Conditional Pass" in all five focus areas**, indicating that the agency has at least partial readiness with a defined plan to achieve readiness by or shortly after go-live.
  - Since assessments are completed at the agency-level, in some cases a conditional pass that shows partial readiness may indicate that some facilities may not be ready to go-live and others are ready.
    - In these cases, DHCS will work with the agency to provide partial approval to allow facilities that are ready to go-live, rather than requiring them to wait until the remaining facilities in the county are ready.
- **If an agency receives a "Fail" in any focus area, DHCS will engage the correctional agency on corrective actions** to work towards readiness by the proposed or a future go-live date.

# Readiness Assessment Scoring Rubric

*Pre-Decisional Draft*

 Pass	<p><b>Response is complete and indicates total or almost total readiness</b> in the focus area.</p>
 Conditional Pass	<p><b>Response is complete and indicates partial readiness</b> with a defined plan to achieve readiness by or shortly after the go live date.</p>
 Fail	<p><b>Response is incomplete</b>, the provided response did not sufficiently address the question, or the provided response did not indicate readiness or define a plan to achieve readiness by or shortly after the go live date.</p>