

CalAIM Justice Involved Correctional Facility Readiness Assessment Office Hours

February 15, 2024

Transcript

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VISUAL	SPEAKER – TIME	AUDIO
Slide 1	Emma – 00:38	Hello and welcome. My name is Emma and I'll be in the background answering any Zoom technical questions. If you experience difficulties during the session, please type your question into the Q&A. We encourage you to submit written questions at any time using the Q&A function at the bottom of your screen. And with that, I'd like to introduce Sydney Armendariz, chief of the Justice-Involved Reentry Initiative branch at DHCS.
Slides 1-2	Sydney Armendariz – 01:01	Thank you. Good morning and welcome everyone. Thank you again for joining us for today's Office Hours session. Like Emma said, my name is Sydney Armendariz. I'm the chief of the Justice-Involved Reentry Services branch here at the Department of Healthcare Services. So DHCS has recently finalized our Correctional Facility Readiness Assessment Template that all facilities must submit before implementing pre-release services for the justice-involved initiative. During this Office Hour session, DHCS will provide an overview of the Correctional Facility Readiness Assessment Template and submission process, highlighting changes that have been made to the template since it was released for public comment late last year. We'll also save time at the end of the presentation to respond to any questions regarding the completion and submission of the correctional facility readiness template.

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VISUAL	SPEAKER – TIME	AUDIO
Slide 4	Sydney Armendariz – 01:56	<p>So next slide please. So I'll start off with an overview of the Correctional Facility Readiness Assessment Template. Next slide. As you're likely aware as the condition of the Section 1115 demonstration, all prisons, jails, and youth correctional facilities are required to demonstrate readiness to participate in the justice-involved initiative and receive DHCS approval prior to going live with pre-release services. DHCS will require each correctional facility to complete and submit a readiness assessment template at least six months prior to its planned go-live date to demonstrate its readiness to provide pre-release services and behavioral health links. Readiness assessments will be conducted on a quarterly basis and will focus on five key areas, Medi-Cal application processes, 90 day pre-release eligibility and behavioral health link screening, 90 day pre-release services delivery, reentry planning and coordination and oversight and project management. Notably and in a change from previous policy readiness decisions and approval for go-live will be made at the individual facility rather than at the county level. Next slide please.</p>
Slide 5	Sydney Armendariz – 03:14	<p>So the readiness assessment template contains a series of attestations narrative responses and in some instances requests for supporting documentation. Most readiness assessment elements are categorized as minimum requirements, which indicates that a correctional facility must demonstrate the capability will be in place by the go-live date as a condition of approval. The correctional facility must also demonstrate the ability to meet the three readiness elements categorized as non-minimum requirements within six months after the go-live date. And those are clinical consultation, support for durable medical equipment upon release and governance structure for partnerships. To receive approval from DHCS to go-live, a correctional facility must receive an approved score in all five focus areas indicating readiness to meet minimum and non-minimum requirements within specified timeframes.</p>

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VISUAL	SPEAKER – TIME	AUDIO
Slide 5	Sydney Armendariz – 04:09	If DHCS does not approve the correctional facility for go-live, we will of course work with the correctional facility on updating the existing submission and or developing an action plan until approval is granted. Facilities are encouraged to use PATH dollars to support the planning activities that are necessary to demonstrate readiness. Facilities can also leverage information from their PATH JI capacity building program progress reports to build out relevant sections of the readiness assessment. Next slide please.
Slide 6	Sydney Armendariz – 04:46	So in October, 2023, DHCS released a draft Correctional Facility Readiness Assessment Template for stakeholder comment. Over the last several months, DHCS has worked to update the readiness assessment based on stakeholder feedback and we'll soon release the final template. Our updates to the final template primarily focus on providing additional guidance to correctional facilities on how to gather information for complete and submit the readiness assessment template. We also improve the user-friendliness and clarity of the readiness assessment template format and we updated the attestation narrative responses and documentation to reflect the most up-to-date policy and operational guidance. Next slide please.
Slides 7-8	Sydney Armendariz – 05:34	So DCS updated the attestation section of each focus area to allow correctional facilities to more clearly denote readiness status and timeframe to meet readiness for each minimum requirement. We've included an example of the updated attestation table on this slide. As you'll see, we have also added the ability for a correctional facility to request technical assistance from DHCS if it is unable to meet a given requirement by the deadline for go-live. Next slide please. DHCS also updated the narrative response section of each focus area to establish word accounts and provide space for correctional facilities to enter responses. We've included an example on this slide of what you should expect to see for areas where narrative responses are required. Next slide please.

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VISUAL	SPEAKER – TIME	AUDIO
Slides 9-10	Sydney Armendariz – 06:32	<p>Finally, DHCS also updated the supporting documentation section of each focus area to clarify supporting documentation requirements including which types of documentation are required or optional. Next slide. So we made a few additional template updates as well. So the scoring rubric, we updated the scoring rubric terminology to approved, not yet ready or denied. As I indicated earlier, we have also updated facility level approval. So DHCS will issue readiness decisions and go-live approval at the individual facility rather than the county level. DHCS also added guidance on joint readiness assessment submissions for small counties who may contract with neighboring counties to house their incarcerated individuals.</p>
Slide 10	Sydney Armendariz – 07:25	<p>Correctional facilities must also submit a letter from their county's behavioral health agency indicating a mutual agreement on the behavioral health link screening tool and process. DHCS also added attestations related to compliance with future oversight and monitoring efforts. And we also added a section four for go-live date request. Correctional facilities must indicate their requested go-live date and have their readiness assessment signed by the authorized individual who will be accountable for implementing the Reentry Initiative. And lastly, we indicated a change to the signed MOU, correctional facilities will be required to attest to their intent to enter an MOU with DHCS as part of a readiness assessment template and the MOU must be signed prior to go-live as a condition of approval. Next slide please.</p>

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VISUAL	SPEAKER – TIME	AUDIO
Slide 10	Sydney Armendariz – 08:25	<p>My apologies. Can you go back to the last slide? Thank you. Sorry about that. So for the joint submission process, just to add some detail to that, we recognize that small counties do not have a youth correctional facility and or a jail, and instead they might contract with surrounding counties to house their incarcerated youth and or adult populations. In these instances, the county housing the incarcerated individual might provide healthcare services to incarcerated individuals and will provide pre-release services upon go-live. While the county without a youth and or adult facility may provide a subset of Reentry Initiative services such as reentry planning and coordination services during the pre-release period. For these counties, DHCS will require a joint readiness assessment submission process. Specifically this means that the governmental entity that is accountable for providing healthcare to youth and or adults who are incarcerated in its county correctional facilities and upon go-live, that will serve as the pre-release services billing entity is the entity accountable for completing the readiness assessment.</p>

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VISUAL	SPEAKER – TIME	AUDIO
Slide 10	Sydney Armendariz – 09:39	<p>So we're terming that as the Prime County, the Prime County may contract with other counties, their partner counties to provide pre-release service components under the prime facilities NPI. Partner counties who will provide a component of the pre-release service package will be required to contribute to the readiness assessment submission of any prime counties with which it contracts to demonstrate partner county readiness to provide those specific pre-release services. Partner counties should also notify DHCS of the intent to contribute to the readiness assessment submission of any prime counties with which it contracts via email to receive additional details on the joint submission requirements. And then also to add some detail to the last bullet here about the MOU. The MOU template requires, sorry, the readiness assessment template requires that correctional facilities attest to their willingness to enter into a forthcoming MOU with DHCS. DHCS is currently working to draft the MOU and plans to make it available to stakeholders in the coming weeks. Once the MOU has been finalized, correctional facilities will be required to sign the MOU prior to their go-live date as a condition of final approval. Thank you. Next slide please.</p>
Slide 12	Sydney Armendariz – 11:05	<p>So now I will talk about the readiness assessment completion and submission process. Next slide. This slide provides additional details on the readiness assessment submission process including correctional facility and DHCS responsibilities during the readiness review. And it also includes a sample timeline for those facilities that are seeking to go-live on October 1st, 2024. As noted previously, correctional facilities must submit their complete readiness assessment template to DHCS at least six months prior to their requested go-live date and no later than March 31st, 2026 in order to ensure that all facilities are able to go-live by October 1st, 2026.</p>

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VISUAL	SPEAKER – TIME	AUDIO
Slide 12	Sydney Armendariz – 11:54	<p>Now this table on the slide shows an example timeline of submission and readiness determination. In February through March of 2024, the correctional facility is responsible for convening a working group of key professionals in leadership and then also complete the readiness assessment template. During this time, DHCS will address questions and provide technical assistance to the correctional facility as requested. The next timeframe from April to June, the correctional facility should submit their readiness assessment template to DHCS by April 1st if they're planning to go-live by October 1st, and they should also respond to any questions from DHCS or requests for additional information and notify DHCS when areas are marked as ready upon go-live, as ready or as needed. During this time, DHCS will evaluate the readiness template submission and follow up with the correctional facility to address questions and provide feedback. In July of 2024, in this example, DHCS will make the final determination of readiness for go-live and communicate the decision to the correctional facility. And then in July through September, if the correctional facility is approved, they should start preparing to go-live with pre-release services including entering an MOU with DHCS.</p>

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VISUAL	SPEAKER – TIME	AUDIO
Slide 12	Sydney Armendariz – 13:21	<p>If they were deemed not yet ready, they should then notify DHCS when areas marked as ready by go-live already and then prepare to go-live with pre-release services including entering in an MOU with DHCS. And if they are denied, they should resubmit the template on a quarterly basis until they are approved. During this timeframe, DHCS will work with the correctional facility, if they are approved or not yet ready. DHCS will then enter into an MOU at the correctional facility, provide any needed technical assistance during the preparations to go-live. And if the correctional facility was denied, DHCS will provide additional technical assistance to the correctional facility to achieve readiness. In this example, if the correctional facility achieved readiness according to this timeline, then starting on October 1st, 2024, they can begin providing pre-release services. And then by April 1st, 2025 the correctional facility should confirm to DHCS that all non-minimum requirements are live. And then DHCS will continue providing ongoing technical assistance to the correctional facility and support ongoing monitoring activities.</p>
Slides 12-13	Sydney Armendariz – 14:38	<p>Please keep in mind this is an example timeline based on if a correctional facility would like to go-live as of October 1st, 2024. If a correctional facility wants to go-live after that date, after October 1st, 2024 of course then this example, a timeline would shift to accommodate that date. Next slide please. And so while we're on the topic of timelines and in order to better inform DHCS planning efforts, we'd love to get a better idea of when facilities plan on going live with pre-release services. So you should see a poll pop up on your screen. If you can just select the timeframe of when your correctional facility plans to go-live with pre-release services, that would be extremely helpful. So we'll give folks a second to indicate their response.</p>
Slide 13	Emma – 16:04	<p>Sydney, I see a few more responses are coming in, so we'll just give it one more moment and then I'll go ahead and share those results.</p>

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Slide 13	Sydney Armendariz – 16:10	<p>Okay, sounds good. Okay, so the poll has now closed. So it looks like the general responses were about 27% planned to go-live October, 2024, which is great news. 11% plan to go-live in January of 2025, 3% plan to go-live in March, 2025. About 11% plan to go-live in the third or fourth quarter of 2025. 1% plans to go-live in the first quarter of 2026. And then about 10% plan to go-live in the last quarter of 2026. And about 37% are unsure of their planned go-live date, which is perfectly fine. We appreciate all of your responses. This helps us get a sense of where correctional facilities are at in their planning process. Next slide please.</p>
Slide 14	Sydney Armendariz – 17:20	<p>So this slide provides more detailed step-by-step instructions on the process for completing and submitting the readiness assessment template. So I'll walk through this workflow here on this slide. So first, the correctional facility should convene a working group of professionals, which can include leadership, health providers, care coordination, and contractors. Next, they should assign each section the readiness assessment template to relevant professionals to provide information. Third, determine a go-live date. Please note that correctional facilities must go-live between October 1st, 2024 and September 30th, 2026. And the readiness assessment template must be submitted six months prior to the plan go-live date. The fourth step is that DHCS, I'm sorry. The fourth step is that the correctional facility should review the readiness assessment template and assess whether the correctional facility meets the listed requirements.</p>

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Slide 14	Sydney Armendariz – 18:27	<p>The fifth step is to indicate whether the correctional facility meets each of the listed requirements by marking the checkbox attestations. The sixth step is to develop a narrative response that describes how the correctional facility meets the listed requirements by the requested go-live date. The seventh step is to of course, compile the supporting documentation for the readiness assessment. Next is to review and sign the required list of additional attestations that are in section three of the readiness assessment. Next is to compile review and revise the readiness assessment template responses as a working group. And then lastly is to submit the completed readiness assessment template with any supporting documents to DHCS using a secure file transfer. And as noted on the bottom of this slide, correctional facilities may contact DHCS with questions as they fill out their readiness assessment template. Next slide please.</p>
Slide 15	Sydney Armendariz – 19:34	<p>So DHCS readiness evaluation approach. This slide describes the approach that DHCS will take when evaluating a correctional facility's readiness assessment template submission and determining their readiness to go-live with pre-release services and behavioral health link. As noted on this slide, DHCS will determine a score for each focus area based on the correctional facilities, attestations, and narrative response. DHCS will then determine the correctional facilities overall readiness assessment score. So I'll walk through this slide as well. So the readiness assessment score and rubric is shown on this slide. The first score is an approved, so that indicates that the response is complete and indicates readiness in each readiness element of the focus area. So in the minimum requirements, the correctional facility is ready to go-live and for the non-minimum requirements, the correctional facility is ready to go-live with those non-minimum requirements within six months after the go-live date.</p>

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Slide 15	Sydney Armendariz – 20:37	The second score is not yet ready. The response is complete and indicates that the correctional facility meets some but not all components of the template. So for the minimum requirements, the correctional facility has a clear time bound action plan to meet the outstanding minimum requirements by the requested go-live date. And the non-minimum requirements, the correctional facility will work with DHCS to be ready to go-live with those non-minimum requirement elements within six months after the go-live date. Lastly is a denied score. The response is incomplete or does not sufficiently address narrative questions or the submission does not indicate readiness to go-live by the go-live date for minimum requirements or within six months of the go-live date for non-minimum requirements. If a correctional facility receives a denied score in any focus area, DHCS will work with the correctional facility to develop an action plan to achieve readiness. Next slide please.
Slide 16	Sydney Armendariz – 21:45	So that is the end of the formal presentation. At this time, we welcome your questions and comments on the readiness assessment template and submission requirements. Please utilize the Q&A function on Zoom to submit your questions and we'll be happy to answer them at this time.
Slide 16	Allison Garcimonde – 22:07	Thanks Sydney. And hello everybody. My name is Allison Garcimonde. I am part of the Manatt team that has been supporting Sydney and the OSPJI team in this initiative. And I am going to help here on some of the questions that have been coming in through the Q&A box, which you should all see at the bottom of your screen. So if there's a question that you have and have not had the opportunity to submit it yet, please feel free to go ahead and drop it in the Q&A box and we will do our best to work our way through them now.

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VISUAL	SPEAKER – TIME	AUDIO
Slide 16	Allison Garcimonde – 22:43	So one of the questions that we have first received was, sorry about this, just find my place. So we had a question come through in the Q&A asking whether or not it would be possible to get some example narrative responses for some of the questions. And the person noted that the word limits that they saw on the narrative response slide makes them think that perhaps their responses might be a bit more detailed than what is being requested or needed. So the question is whether or not DHCS is considering making any example submissions available to folks to inform their thinking as they do their submissions?
Slide 16	Sydney Armendariz – 23:30	Great, thank you for the question. So yes, DHCS is working to provide a model for responses to the readiness assessment template. We are currently working on that. We are in the beginning stages, so I don't have an exact timeline of when we'll be able to release an example of a response to the narratives, but we are currently working on that.
Slide 16	Allison Garcimonde – 23:56	Great, thank you Sydney. We had another question come in asking whether the information that was provided regarding the joint submission process for partner counties can be made available in writing?
Slide 16	Sydney Armendariz – 24:13	Thank you again for the question. So yes, we will include details on the joint submission process in the final version of the readiness assessment template. It will also be included in future updates to the policy and operational guide as well as in the transcript of this session. This session is being recorded and there will be a transcript available on our website shortly after our call today.
Slide 16	Allison Garcimonde – 24:37	Great, thank you. So we had kind of on the global question frame, we had a question that was pre-submitted prior to the session. So thanks to the folks that send in some questions in advance of our meeting. And the question was whether or not DHCS will accept draft policies and procedures as supporting documentation for the readiness assessment?
Slide 16	Sydney Armendariz – 25:04	Yes, thank you for that question. Yes, we will accept draft policies and procedures as supporting documentation for the readiness assessment template. That's perfectly fine.

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Slide 16	Allison Garcimonde – 25:16	Thank you so much. So we had a question or two and let me just work my way through here. So we had a question related to the MOU requirements and this person indicated that MOUs can take time at the county level and so questioning what would happen if a correctional facility were to attest to their intention to complete the MOU. The readiness assessment is nearly approved by DHCS, but the MOU has not been executed by the go-live date.
Slide 16	Sydney Armendariz – 25:56	Thank you. So DHCS recognizes that the execution of MOUs will require several conversations with counties on a case-by-case basis. So details on the MOU process and the related requirements are still being finalized. So we will release more information about this process in the future and then of course work with counties on a case-by-case basis to work out those details.
Slide 16	Allison Garcimonde – 26:23	Thank you Sydney. We also got a question kind of building on thinking about the time that it takes to enter into contracts at the county level. And the question was, "In preparing our PATH implementation plan staffing to build infrastructure and implement is going to consume a of the PATH award dollars that were received in round three, round one and round two were not significant to support much besides technological advancement planning or coordination for this particular stakeholder. Are there any intentions to release additional funding, PATH funding in round three or subsequent rounds to aid and sustainment beyond the first year?"
Slide 16	Sydney Armendariz – 27:07	Thank you for this question. As of now, we do not have plans to have another round of PATH funding made available. So the PATH Round 3 funding was meant to be startup funding for correctional facilities and behavioral health agencies to start planning and implementing pre-release services. After that startup funding then it is expected that county correctional facilities and county behavioral health agencies will use the Medi-Cal reimbursement dollars to sustain those services. So thank you for that question.

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Slide 16	Allison Garcimonde – 27:46	Excellent. We had a question that is hopefully an easy one here. It just said that having a sense of the date for when the final readiness assessment template would be published would prove helpful in planning efforts for those folks in particular that are planning to go-live on October 1st, 2024. So information on when that readiness assessment template will hit folks inboxes. My sense is that it's in the ether if it has not yet hit their inbox.
Slide 16	Sydney Armendariz – 28:16	Yes, thank you. So we did send out the PDF version of the readiness assessment template, I believe about 30 minutes prior to this call. So around 10 o'clock this morning. So we sent it out via email. We are working on getting it finalized to post onto our website. It just needs to go through some ADA remediation process in order to be posted to our public website. So you should have received a copy via email. If you did not, please email us at our CalAIM Justice Advisory Group email inbox. I'm going to ask my team if we can put that in the answer to this question in the Q&A, put that email address there so folks can have it. If you did not receive it in your inbox, please email us at that email address and we'll be sure to get it to you.
Slide 16	Allison Garcimonde – 29:11	Thanks Sydney, and thanks to that individual who submitted the question. So I'm going to toggle back to a few additional questions that were pre-submitted in advance of the call and these get to the requirements for readiness but also are a little bit more in the weeds of the policies. So the first one relates to embedded providers and responsibility for enrolling. So specifically, "A correctional facility plans to contract with a vendor to provide embedded pre-release services. In that scenario, is the correctional facility required to apply for an exempt from licensure clinic status for the facility or can the correctional facility delegate that responsibility to the contractor?"
Slide 16	Sydney Armendariz – 30:01	So thank you for this question. The correctional facility must enroll as an exempt from licensure clinic and contracted providers will bill under the correctional facility's NPI number.

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Slide 16	Allison Garcimonde – 30:14	Great. And then building on that, so confirming that the correctional facility is in fact required to apply and to be enrolled as an exempt from licensure clinic and a contractor will be providing all of the pre-release services. "Is the billing claimed through the correctional facilities MPI or can it be delegated to be claimed under the vendor's MPI?" And this is obviously a repeat of the previous question, but just to make sure folks are tracking there.
Slide 16	Sydney Armendariz – 30:43	Of course. So in that scenario, pre-release services would still be provided by a contracted provider and are considered an embedded model and must be billed through the correctional facilities NPI number.
Slide 16	Allison Garcimonde – 30:57	Excellent. And then so given that we have now confirmed that the correctional facility does need to initiate this application and enroll as an exempt from licensure clinic, "Will DHCS be making technical assistance available to facilities in order to navigate the application process?"
Slide 16	Sydney Armendariz – 31:16	Of course, yes. DHCS is available for technical assistance and we will provide guidance on how to enroll. An overview of this process can be found on our website under PAVE enrollment. There's a guide there for PAVE enrollment for our correctional facilities that's linked on that webpage.
Slide 16	Allison Garcimonde – 31:38	Thanks Sydney. And just for folks on the phone, I think we are limited in our ability to push out links in the chat. We will be sure to follow up from the session for the couple of links that we've mentioned today just to make sure that you have those available coming out of the call so that you can reference the email addresses and the website or two that have been referenced. Excellent. We have just a couple more that were pre-submitted. This one relates to behavioral health. The question is, "If behavioral health is currently providing behavioral health services in a correctional facility, are they also considered embedded and therefore need to bill services through the correctional facilities NPI?"

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Slide 16	Sydney Armendariz – 32:28	So if the behavioral health agency is currently contracted to provide correctional facility services, then they're considered under the embedded model and they still bill through the correctional facilities NPI. This scenario and some other scenarios are also outlined in Table 14 of our Policy and Operations Guide.
Slide 16	Allison Garcimonde – 32:52	Thank you Sydney. But I think this was the last of that set of very good pre-submitted questions. This one asks, "Can credentialing be a responsibility that is delegated to the contracted embedded providers to complete for their own staff? Or is the correctional facility solely responsible to ensure that all providers are credentialed?"
Slide 16	Sydney Armendariz – 33:18	Thank you for this question. We'll have to take this question back for consideration and we'll circle back with the response to this question.
Slide 16	Allison Garcimonde – 33:30	Thank you Sydney. We have another question related to sort of example templates for folks to reference as they're thinking through the development of their own policies. And that question was, "Is there examples or templates of policies and procedures for the pre-release program that correctional facilities can use to develop their own policies and procedures?"
Slide 16	Sydney Armendariz – 33:59	Thank you. This is a great question. We can take this back. We're currently working on an example readiness assessment submission that correctional facilities can use as kind of a model to complete their readiness assessment. So we'll take this back. Of course, just recognizing that we are the first state to do this type of work. We're the first in the country to be able to have this justice-involved initiative. So unfortunately there are no models or anything that we can use from past experience for this process, but we will definitely work with our partners to see if we can provide some examples or templates to help correctional facilities plan for readiness.
Slide 16	Allison Garcimonde – 34:46	Thanks Sydney. Another question that I had come in a little bit earlier and it was a question related to how documents should be submitted to DHCS and to what extent would the submission process and the tools align with the PATH submission process?

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VISUAL	SPEAKER – TIME	AUDIO
Slide 16	Sydney Armendariz – 35:10	So that's a great question. So for the readiness assessment process, the correctional facility will submit the readiness assessment template through a secure file transfer with DHCS. So once the correctional facility indicates that they're ready to go-live, DHCS will send instructions on how to complete the secure file transfer. So that's different than how the counties usually submit things through PATH. PATH uses a portal called Grants Connect to have correctional facilities and behavioral health agencies submit their implementation plans and other grant documents. So that Grants Connect portal is only for PATH. For the readiness assessment process, correctional facilities will submit it through a secure file transfer.
Slide 16	Allison Garcimonde – 35:58	Great. And we had gotten sort of a similar question Sydney, just about how PATH implementation plans in general differ from the readiness assessment submission?
Slide 16	Sydney Armendariz – 36:13	Yeah, this is a great question. We've had this question come up several times over the last couple of months. So the implementation plan for PATH Round 3, first off, it's only for counties that receive PATH Round 3 funding. If your county did not receive PATH Round 3 funding, you are not required to complete an implementation plan. So the implementation plan is kind of the second step in the PATH Round 3 process. It's really a gap analysis of where your current processes are, your current staffing levels are and how you plan to use the PATH funding to basically achieve readiness to achieve implementing pre-release services. So think of it as kind of just a plan for how you plan to reach readiness. The readiness assessment template of course is much more comprehensive, much more thorough. The readiness assessment comes into play when your county deems itself ready to start delivering pre-release services.

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Slide 16	Sydney Armendariz – 37:13	So the readiness assessment process will require the draft or the final policies and procedures that your correctional facility or agency has developed for pre-release services. It requires much more thorough narrative responses about the processes that are in place, the staffing levels that are in place to be able to provide pre-release services. So all county correctional facilities and state prisons CDCR system, all the correctional facilities in the state are required to complete the readiness assessment template. But not all correctional facilities are required to do the implementation plan if you did not receive PATH funding. We recently did a PATH Office Hours about this topic as well. So please check out our PATH website to find the meeting documents and the presentation slides that were presented on this topic as well.
Slide 16	Allison Garcimonde – 38:14	Thank you Sydney. And we'll drop that link into the chat here in just a minute for folks that they would like to check that out. We had a few questions that come through related to behavioral health agency billing. So one question asks, "When would the county behavioral health agency bill for pre-release services through Short-Doyle as opposed to fee-for-service through the correctional facilities NPI?"
Slide 16	Sydney Armendariz – 38:43	Thank you for the question. So I'm going to phone a friend here and ask my colleague Megan Shandel to take this question.

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VISUAL	SPEAKER – TIME	AUDIO
Slide 16	Megan Shandel – 38:52	Hi everyone, I'm the policy and program support unit chief working under Sydney on the reentry side of the house and also focusing on the behavioral health links. So the behavioral health agency, if I'm not mistaken, will if they're providing pre-release services as an embedded or an inReach provider, those services will be billed through fee-for-service using the KMIS system. Once the individual is released, that behavioral health provider may continue to provide services in the post-release setting and bill through their normal Short-Doyle pathways. If the behavioral health agency is not the inReach or the embedded provider and they are the recipient of the behavioral health link, they may bill their activities through Short-Doyle for the receiving of the behavioral health link. And hopefully that was clear. If not, please feel free to enter any additional questions you have into the Q&A.
Slide 16	Sydney Armendariz – 39:56	Thank you Megan. And to also add to her response, you can also refer to Table 14 in the Policy Guide for a detailed breakdown on when the County Behavioral health agency should bill Short-Doyle.
Slide 16	Allison Garcimonde – 40:13	Great. Helpful. We also had a question come in whether there is someone that individuals are able to reach out to for technical assistance specifically as they are planning for the billing components of pre-release services and related services?
Slide 16	Sydney Armendariz – 40:33	Yes. So for right now, please send any request for technical assistance to our CalAIM Justice-Involved Advisory Group email address. We will then work with our internal DHCS partners to provide the appropriate technical assistance. So please send those requests, any requests for technical assistance to that inbox and we'll be sure to work with the right internal people to get you that assistance.
Slide 16	Allison Garcimonde – 41:06	Thank you. Megan, I think this one potentially would bounce back to you because I think it's building on the Short-Doyle response that you just provided. And the follow-up was, "What if the behavioral health agency will be both the embedded inReach provider and the post-release behavioral health link recipient?" So they're providing both those inReach services as well as the post release behavioral health link services.

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Slide 16	Megan Shandel – 41:38	Right. So all services provided in the pre-release setting will need to be billed fee-for-service through KMIS. All services provided in the post-release setting will go through normal billing pathways, which is typically Short-Doyle for behavioral health agencies. The only actions that can be billed through Short-Doyle while the individual is still incarcerated will be the receiving of a behavioral health link.
Slide 16	Allison Garcimonde – 42:09	Great. Thank you Megan. Looking through, we had a question come through and I'm going to assume that this relates to PATH requirements and the question was, "Can we request an extension for the progress report that is due by the end of March?"
Slide 16	Sydney Armendariz – 42:33	Yes, thank you For this question, I also put in a written response. Please email that request to our justice-involved@capath.com email address and we will review your request on a case-by-case basis. So please send that request to that email address that I indicated in the Q&A.
Slide 16	Allison Garcimonde – 43:00	Excellent, thank you Sydney. We had another question come in. This one relates to fee-for-service rates. "Can DHCS provide a copy of the pre-release services fee-for-service rates?"
Slide 16	Sydney Armendariz – 43:19	Yes. Thank you for this question. We've received this question a lot over the last couple of weeks. Right now we do not have a published fee-for-service rates table just yet. We are working on some internal approval processes and working with CMS to approve those rates and we will release them as soon as we can. So I don't have a formal timeline just yet, but we will definitely release them once we get all of the approvals wrapped up and finalized.
Slide 16	Allison Garcimonde – 43:52	Thank you. So we had a question related to pharmacy and dispensation of medication. So this question is, "If there is a central embedded pharmacy at one correctional facility that dispenses medication to three additional correctional facility locations, does that pharmacy need to enroll as a Medi-Cal pharmacy once or four times for each correctional facility location that it dispenses to?"

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VISUAL	SPEAKER – TIME	AUDIO
Slide 16	Sydney Armendariz – 44:28	I'm going to phone a friend here. Caroline, can you answer this question or is this one that we need to take back?
Slide 16	Caroline Dunlop – 44:35	No, I can answer this question. Hi, I am Caroline Dunlop. Each pharmacy that is dispensing for a correctional facility has their own unique NPI number and needs to enroll. So if they're dispensing to multiple correctional facilities, they still only need to enroll once. One pharmacy with each NPI needs to enroll.
Slide 16	Sydney Armendariz – 45:01	Awesome, thank you. I felt like that was the answer but it's high stakes and I didn't want to guess so thank you Caroline.
Slide 16	Allison Garcimonde – 45:09	That was a good one. Thank you Caroline. Okay, just looking, there's a lot of great questions coming in through the Q&A. I think we're working our way pretty much through most of them. So we did have a question related to what might occur if a correctional facilities plans need to change after approval of the readiness assessment and go-live date. To what extent has DHCS envisioned any flexibility there?
Slide 16	Sydney Armendariz – 45:40	Yes, this is a good question. I think the short answer would be we would work with the county correctional facility to on a case by basis to see what needs to change and how we can accommodate the change as well. So right now we don't necessarily have just a formal process for those changes. I believe that would just be on a case-by-case basis according to the correctional facilities needs at the time.
Slide 16	Allison Garcimonde – 46:10	Great. Another question that I think was answered in the Q&A, but just to make sure that everyone has the opportunity to hear the response. The question is, "What types of medical services will be billable pre-release by a medical provider working in the facility?"
Slide 16	Sydney Armendariz – 46:33	Can you read that question one more time?
Slide 16	Allison Garcimonde – 46:35	I sure can. I did a little bit of a choppy version. Let me give it to you again.
Slide 16	Sydney Armendariz – 46:39	It's okay.
Slide 16	Allison Garcimonde – 46:40	"What types of medical services will be billable pre-release by a medical provider working in the facility."

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Slide 16	Sydney Armendariz – 46:47	Okay, thank you for this question. So I see my team responded in writing. So our covered pre-release services are defined in Section 8.1 of our guide. It's also on Table 9, page 75. I'll go ahead and just share a short summary though. The justice-involved initiative for pre-release services covers things like reentry case management services, physical and behavioral health clinical consultation services that are provided either via telehealth or in person, laboratory and radiology services, medications and medication administration, medication assisted treatment or medications for addiction treatment, also known as MAT and services that are provided by community health workers with lived experience. And then it also covered outpatient prescribed medications and over-the-counter drugs and also durable medical equipment upon release. So please take a look at our Policy and Operations Guide and the specific Section 8.1 that's pointed out in the written response for more information about what's covered.
Slide 16	Allison Garcimonde – 47:58	We have one additional question on this embedded provider distinction. The question was, "Can an embedded correctional health provider IE, a county health department apply as the Medi-Cal exempt from licensure clinic on behalf of the correctional facility?"
Slide 16	Sydney Armendariz – 48:18	So thank you for this question. So no, an embedded correctional health provider cannot apply on behalf of the correctional facility. Correctional facilities must enroll as Medi-Cal providers to be reimbursed for the delivery of the targeted pre-release services and behavioral health links that's outlined in Section 9.3 of our Policy and Operations Guide.
Slide 16	Allison Garcimonde – 48:43	Awesome, thanks Sydney. And then we have another question that just came in. "If a correctional facility receives its medications from a pharmacy in the community, will that facility be able to bill Medi-Cal for medications, order 90 days pre-release, including those that will be provided to the inmate or youth at discharge? Currently the correctional facility has to pay for these medications."

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Slide 16	Sydney Armendariz – 49:13	So I believe the answer is no, but I'm going to phone a friend. Caroline, is this something that you can answer or should we take this back as well?
Slide 16	Caroline Dunlop – 49:24	Let me reread the question. So, "If a correction facility receives its medication from a pharmacy in the community, will that facility be able to bill Medi-Cal for medications ordered 90 day pre-released?" So it depends on the medication and how the medication is administered. If the medication, and this example was given yesterday, if a medication is dispensed from an outside pharmacy, that pharmacy is the one that will be doing the billing. It all depends on who dispenses the medication. If the medications are stored in bulk at the correctional facility, for instance a chemo drug medication, then that medication, the circumstances could be different. So it would depend on the type of drug, who's dispensing it. So I would need to know a little bit more about the specifics, but it's always the dispensing pharmacy that with the unique NPI that is doing the billing. So it wouldn't be billed by the correctional facility unless it's a specialty drug that's stored at their facility. Does that make sense?
Slide 16	Sydney Armendariz – 50:45	Yeah. Thank you Caroline for providing that response and context. I think this question came from Emily. If you can send that particular question to our inbox, we'll also note it here in our notes for today's webinar. We'll be sure to circle back with you on a response to that question in light of Caroline's response and we might need some more information about that. Oh sorry, this came from Michelle. My apologies. I was reading the wrong name there. So yes, Michelle, if you can submit that question to our inbox, that would be most helpful and we'll also note it here for our own notes.
Slide 16	Allison Garcimonde – 51:38	Excellent. Looks like we have one more question pending in the Q&A. I'll give it one more look around, make sure I didn't miss anything. This one asks, "If some of the submitted readiness assessment is deemed not yet ready. Do we have to push the go-live date to the next cohort to meet the minimum six-month timeframe before go-live?"

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Slide 16	Sydney Armendariz – 51:59	Great question. No, we wouldn't necessarily push it back by six months, but of course this would all be on a case-by-case basis depending on the issue or focus area that was deemed not ready to go-live. So we would work with the county correctional facilities on a case-by-case basis to determine that the new timeframe for go-live, if it's necessary.
Slide 16	Allison Garcimonde – 52:25	Thanks Sydney. I think, and I'm double checking because I don't want to miss anyone. I think that is all of the questions that we've received through the Q&A box so far. Are there any other questions that folks would like to share now before we drop and we have a couple more slides to walk through with you, we will be sure to copy the DHCS Justice-Involved email box into the chat for all of you to copy down and make sure that as questions pop up, you are sending them along and DHCS is able to respond to you and provide you with any additional responses or technical assistance. Some folks are coming in with some last questions, which is great. We have one more in the Q&A that says, "Is there guidance relating to staff scope of practice related to the pre-release services that correctional facilities are required to provide?"
Slide 16	Sydney Armendariz – 53:31	I think we might have to take this back, but our Policy and Operations Guide is pretty much our guiding document for the justice-involved initiative. So you might be able to find some more information about this question there. I'm not sure if anyone on the line from DHCS can help respond to that or if we should go ahead and take that one back. Okay. I wasn't sure. Okay. Yeah, we can go ahead and take this question back.
Slide 16	Allison Garcimonde – 54:03	Great. We'll plan for that. We'll make sure we'll note it down. And the last question or comment that I see in the Q&A box is just a note that, "Bouncing ideas, policies, et cetera with other correctional facilities is really helpful. A Listserv would be great to chat with each other." So Sydney, don't know if you want to share any opportunities for sort of peer-to-peer learnings or technical assistance that you might have planned.

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VISUAL	SPEAKER – TIME	AUDIO
Slide 16	Sydney Armendariz – 54:28	<p>Yeah, this is a great segue into that. Thank you so much for this feedback. So first I will advertise our PATH Office Hours. So if your county received PATH Round 3 funding, we highly encourage you to join our PATH Office Hours. That's really a great forum for counties to ask questions of each other, seek feedback, discuss any challenges or even any successes in your implementation process. So those PATH Office Hours occur I believe every other Monday. If you would like more information about that, you can please email the justice-involved email address that I believe Manatt events, Emma put into the chat. So please utilize those PATH Office Hours. It's an awesome way to collaborate with the other counties that might be facing similar challenges. We're also working on our stakeholder engagement strategy for implementation. So we are planning to do sort of a regional technical assistance strategy where we'll have different counties in different areas kind of partner together to provide just like an open forum for counties to ask questions and things like that that might not necessarily be PATH related. So look out for more information from that as well.</p>
Slide 16	Sydney Armendariz – 55:52	<p>And then of course you can always utilize and leverage my team and I, we are definitely here to help you and provide any technical assistance you might need. So please email us at that CalAIM Justice Advisory Group inbox as well. That goes directly to my team. They manage it every day so that it's not going to fall into the ether, it's not going to go into a black hole. We definitely take those requests in that inbox very seriously. So if you would like any further TA, please reach out to us at that inbox and we'll be happy to help.</p>
Slide 16	Allison Garcimonde – 56:28	<p>Excellent, thank you. So helpful. So I see that we just have a few minutes left in the session and there are no questions left in the Q&A box, so I think we are okay to move ahead on our slides and to close out our session today.</p>

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VISUAL	SPEAKER – TIME	AUDIO
Slide 18	Sydney Armendariz – 56:44	<p>Awesome, thank you. So just a quick update on upcoming Readiness Assessment Office Hours. So we will host another Office Hour session on the Correctional Facility Readiness Assessment on Thursday, March 7th from 10:30 to 11:30. At this Office Hours, we will provide another high level overview of the readiness assessment template. We'll review pre-submitted Q&A, and then of course respond to live Q&A. If you have any questions, please submit your questions on the Correctional Facility Readiness Assessment Template in advance of this meeting, in advance of the March 7th Office Hours via the Q&A pop up that just came up on your screen. Or of course you can email us at the CalAIM Justice Advisory Group inbox.</p>
Slide 18	Sydney Armendariz – 57:33	<p>And while you're completing that poll that just popped up on your screen, I will just give a heads-up. We have not sent out a calendar invite or registration link for the Office Hours on March 7th. So do not fret, you did not miss anything. It did not go into your junk inbox or spam filter or anything like that. We didn't want to send it out to prevent confusion about today's Office Hours as well. So we will send out that link shortly after this session today. So just giving folks a second to submit any questions before we go ahead and end today's Office Hours. So we can go ahead and close this out. We'll conclude today's Office Hour session. Hopefully we see all of you and more at our March 7th session. And of course, we look forward to working with each of you throughout the next coming months on your readiness assessment submissions, and future launch of our justice-involved initiatives. So thank you so much for taking time out of your day to join us and look forward to talking with you all soon. So take care and enjoy the rest of your day.</p>