

Enhanced Care Management (ECM) for the Justice Involved Population of Focus (JI POF): Technical Assistance Webinar

Agenda

1. Updates on Enhanced Care Management for the Justice Involved POF

2. Responses to Questions Submitted via the JI ECM Model of Care Template

3. Live Q&A

4. Looking Ahead

Updates on ECM for the Justice Involved POF

DHCS will soon distribute letters to MCPs describing pre-CAP activities and information that MCPs will be required to submit to DHCS. The ECM team will lead several TA sessions after distribution, and MCPs will have time after the TA sessions to submit their responses.

- MOC submissions for the JI ECM POF were challenged and the AIR process did not result in significant improvement.
- MCPs were placed into Tiers based on the evaluation of their MOC, with inadequacy in a priority area defined as failing any of the benchmarks within the priority area:

Priority Areas	Tier D	Tier C	Tier B	Tier A
1. Provider Network Capacity	Adequate in 0 of 3 priority areas.	Adequate in any 1 of 3 priority areas.	Adequate in any 2 of 3 priority areas.	Adequate in all 3 of 3 priority areas.
2. Corrections System Coordination				
3. Network Overlap Implementation				
Action Needed	Yes	Yes	Yes	No

Updates on ECM for the Justice Involved POF

Pre-CAP Structure:

1. Provider Network Capacity	At least 1 experienced JI ECM Provider in each county of operation
	Using sound methodology to estimate ECM capacity needs
	Network sufficiency to meet the estimated ECM capacity needs
	Efforts undertaken to identify, conduct outreach to, and contract with established providers and/or CBOs that serve JI populations.
2. Corrections System Coordination	Operational processes in place to engage and coordinate with correctional facilities , including county jails and YCFs
	Standard operating procedures for the MCP JI Liaison's communications with correctional facilities, including specific procedures for supporting transitions from pre-release to post-release settings. The standard procedures must include at least one specific point of contact in each correctional facility in the MCP's area of service.
3. Network Overlap	Collaboration and regular communication with other MCPs in each county with more than one MCP to meet network overlap requirement and share information about new JI ECM providers.

Questions and Answers Submitted via the Justice Involved Model of Care Template



Summary of Question-and-Answer Topics

- 1. 834 File**
- 2. Correctional Facilities (CF) and Managed Care Plan (MCP) Data Sharing**
- 3. Oversight and Monitoring Activities**
- 4. Pre- and Post-Release Care Coordination**
- 5. ECM Authorization and Coding**
- 6. Behavioral Health Links**

Question 1

Question

When will the JI indicator be available on the 834 file?

Answer

The JI indicator will be live by October 2024, the first month in which correctional facilities may go live with pre-release services.

Question 2

Question

Will the 834 file indicate which individuals are *eligible* for pre-release services, or which individuals are *receiving* pre-release services?

Answer

MCPs will be able to see a JI indicator on the 834 file for all individuals who are deemed *eligible* for pre-release services.

Question 3

Question

Prior to the go-live of pre-release services, what data-sharing expectations are there for MCPs and correctional facilities?

Answer

Prior to the go-live of pre-release services, DHCS encourages collaboration between MCPs and correctional facilities, including referral pathways to ECM and information/data sharing to effectuate connections to ECM in the post-release period. All data and information sharing must take place in accordance with applicable state and federal privacy laws, and with the consent of the individual.

MCPs may engage with incarcerated individuals prior to the go-live of pre-release services in their county of operation.

Question 4

Question

How will MCPs be alerted to an individual's assigned pre-release care manager?

Answer

The MCP JI Liaison is responsible for assigning the pre-release care manager and (if different) post-release ECM provider for all individuals assigned to that MCP. If the MCP JI Liaison did not participate in provider assignment, the correctional facility is responsible for communicating provider assignment to the MCP and including the pre-release care manager information in the Reentry Care Plan.

Correctional facilities may delegate communication of care manager assignment and responsibility for sharing the Reentry Care Plan with the MCP to the pre-release care manager.

Question 5

Question

What information should be included in data-sharing agreements between DHCS and correctional facilities? Will DHCS release additional guidance on data sharing between MCPs and correctional facilities?

Answer

DHCS expects that MCPs and correctional facilities in their county of operation establish data sharing agreements that enables the entities to meet all data sharing requirements articulated in the Policy and Operational Guide for Planning and Implementing the CalAIM Justice Involved Initiative. DHCS does not plan to release a model data sharing agreement between MCPs and correctional facilities. MCPs may reference the [CalAIM Data Sharing Authorization Guidance](#), updated in October 2023, for guidance on cross-sector data exchange and compliance with federal and state data privacy and data sharing consent laws and regulations and other data rules.

DHCS is considering opportunities for regional TA to support data sharing between correctional facilities and MCPs in the coming months.

Question 6

Question

How should correctional facilities inform the MCP of an individual's release date?

Answer

DHCS has set forth the requirement for correctional facilities to have an established process to provide electronic notification of an individual's release date to implementing partners, including the MCP, pre-release care manager, and post-release ECM provider (if different than the pre-release care manager). To be approved to go-live with pre-release services, Correctional Facilities must describe their process for notification in the Correctional Facility Readiness Assessment.

The release date should additionally be included in the individual's Reentry Care Plan, if time permits.

Question 7

Question

What are the technical requirements/specifications for the JSON file, and what is the cadence for JSON file submission?

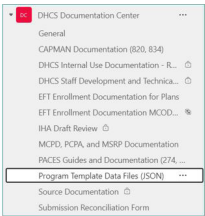
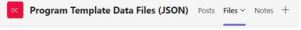
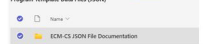
Answer

The technical requirements/specifications to the JSON file is explained in detail in the ECM/CS/CCM Technical Document. This can be accessed from the DHCS Documentation Center:

- [DHCS Documentation Center](#) OR
- <https://teams.microsoft.com/l/team/19%3aMTndJi9gll7WQS1AhqVyLh3AeBMf8syywgxG8KQ1Loo1%40thread.tacv2/conversations?groupId=3862053f-5e17-47be-9fd8-5bbe497e593a&tenantId=265c2dcd-2a6e-43aa-b2e8-26421a8c8526>

JSON file submissions are due every 10th of the month.

ACCESSING THE ECM/CS/CCM TECHNICAL DOCUMENTATION

Introduction	The ECM/CS/CCM Technical Document was created to assist Managed Care Plans (MCPs) to navigate through the ECM/CS/CCM JSON Exchange.
Impacted Parties	All MCPs reporting ECM/CS/CCM data to DHCS.
Process	<p>MCPs will need to:</p> <ul style="list-style-type: none"> • Use one of the links below to access the DHCS Documentation Center <ul style="list-style-type: none"> ○ DHCS Documentation Center OR ○ https://teams.microsoft.com/l/team/19%3aMTndJi9gll7WQS1AhqVyLh3AeBMf8syywgxG8KQ1Loo1%40thread.tacv2/conversations?groupId=3862053f-5e17-47be-9fd8-5bbe497e593a&tenantId=265c2dcd-2a6e-43aa-b2e8-26421a8c8526 <p>Once you are in the DHCS Documentation Center select the "Program Template Data Files (JSON)"</p>  <p>Next select "Files" at the top of the page</p>  <p>Select the "ECM-CS JSON File Documentation" folder</p>  <p>Once you have opened the folder you will be able to access the ECM-CS Technical Documentation along with the Data Dictionary. As we come to the different Phases of the Exchange, the Technical Document along with the Data Dictionary will be updated to reflect them.</p>

Question 8

Question

What are the expectations for MCPs to manage capacity of and provide oversight for in-reach pre-release care managers during the pre-release period?

Answer

DHCS will lead oversight of pre-release service delivery and quality. DHCS does not expect MCPs to provide oversight of quality of pre-release care management rendered by in-reach providers.

DHCS expects MCPs to ensure that all JI ECM Providers (including those that may serve as in-reach pre-release care managers and those that receive warm handoffs from embedded pre-release care managers) meet the expectations outlined in Section 13 of the Policy and Operational Guide for Planning and Implementing the CalAIM Justice Involved Initiative. MCPs must additionally ensure that their JI ECM Provider network meets capacity needs for in-reach providers in their county of operation, which must be ascertained on a county-by-county basis.

Question 9

Question

Will DHCS implement mitigation strategies if a correctional facility does not share a Reentry Care Plan with the individual's assigned MCP?

Answer

Sharing the Reentry Care Plan with MCPs is an expectation of correctional facilities as a part of the Justice Involved Initiative. DHCS will ensure that correctional facilities meet standards of the Justice Involved Initiative through ongoing monitoring; DHCS will provide more information on plans for ongoing monitoring in the coming months.

Question 10

Question

When will DHCS release standard terms and conditions (“boilerplate”) contract language for MCPs to leverage in JI ECM provider contracting?

Answer

DHCS will release standard terms and conditions (“boilerplate”) contract language for MCPs to leverage in JI ECM provider contracting in Q1 of 2024.

Question 11

Question

What are the expectations for MCPs to support care coordination prior to an individual's release to the community?

Answer

If the MCP is known, correctional facilities must engage with the MCP's JI Liaison to assign an in-reach pre-release care manager / post-release ECM provider (if different) as early as 90 days prior to release. Some correctional facilities may engage the post-release care manager during the pre-release period to support connections to community-based services.

During the pre-release period, the MCP JI Liaison is expected to support any post-release planning that will utilize MCP-based services, including but not limited to community supports, PCP assignment, non-specialty mental health providers, and NEMT. MCP support for coordination activities must be available for during the 90-day pre-release period to support the correctional facility/care manager in setting up post-release services for an individual.

Question 12

Question

Should required post-release physical, behavioral health, and social services be scheduled in the pre-release period (i.e., while the individual is still incarcerated) so the individual will have appointments in place upon release?

Answer

Yes. DHCS expects appointments for post-release physical, behavioral health, and social services to be scheduled in the pre-release period, according to the needs of the individual.

Question 13

Question

When must MCPs send new member materials to a JI individual who is enrolled in a “hold” status during their period of incarceration?

Answer

New member materials should be sent upon release, when an individual’s MCP enrollment is effectuated and the “hold” status is removed from the 834 file. DHCS expects MCPs to send the new member materials within 7 days of the effectuation of enrollment and removal of the “hold” status. MCPs are not expected to send new member materials while an individual is incarcerated.

Question 14

Question

Are MCPs expected to arrange Non-Emergency Transportation (NEMT) pickup at correctional facilities upon an individual's release, for individuals enrolled in the MCP?

Answer

For all individuals enrolled in the MCP, the MCP must ensure that the individual can access NEMT as needed (i.e., to transport an individual to a detox facility or a SNF). This includes day of release, if MCP enrollment is effectuated.

Once the individual has been released to the community and MCP enrollment is effectuated, MCPs must follow requirements for NEMT laid out in [APL 22-008](#).

Question 15

Question

Does presumptive/ retroactive authorization for ECM for all members who received pre-release services (so that ECM can start on the date of release) apply to all individuals who *received* pre-release services, or all individuals *deemed eligible* for pre-release services?

Answer

Presumptive/retroactive authorization applies to members who were *deemed eligible* for pre-release services (including but not limited to pre-release care management) and had the JI aid code applied. MCPs should presumptively/retroactively authorize ECM for all individuals who are deemed eligible for pre-release services; MCPs will be able to identify these individuals through the JI indicator on the 834 file.

The MCP may additionally authorize ECM under the JI POF for qualifying individuals who were incarcerated but were not deemed eligible during their period of incarceration (e.g., an individual who was briefly incarcerated and was released prior to screening for eligibility; an individual whose qualifying clinical condition was not identified until after their release).

Question 16

Question

Can DHCS confirm the length of initial authorization for ECM under the Justice Involved Population of Focus?

Answer

DHCS is updating the length of initial presumptive/retroactive authorization for ECM under the Justice Involved Population of Focus to 12 months, in alignment with other ECM POFs.

This policy will be memorialized in the next update to the Policy and Operational Guide for Planning and Implementing the CalAIM Justice Involved Initiative.

Question 17

Question

Upon an individual's release to the community, should MCPs use outreach codes when initiating contact, or should MCPs automatically assume enrollment in ECM and use the standard ECM HCPCS codes?

Answer

DHCS is currently finalizing guidance on use of outreach / ECM codes for the Justice Involved Population of Focus, and will provide an update to MCPs once that guidance is final.

Question 18

Question

For individuals who receive pre-release services, will the start date for the ECM benefit be the first date that the ECM HCPCS codes are used (rather than the date of release from incarceration or date of enrollment into the MCP)?

Answer

Similar to other ECM POFs, the ECM benefit start date is defined as the date of the first billed claim when ECM services were rendered once an individual is enrolled in ECM. Note that ECM is presumptively/retroactively authorized for all individuals deemed eligible for pre-release services, and DHCS expects MCPs to begin to provide services, including ECM, as soon as the individual reenters the community and MCP enrollment is active.

Question 19

Question

What is the MCP and post-release ECM provider role in making appointments for Non-Specialty Mental Health Services (NSMHS) prior to release? What is the MCP and post-release ECM provider role in connecting individuals to Specialty Mental Health Services (SMHS) and county-based services?

Answer

For individuals deemed eligible for NSMHS delivered through the MCP, DHCS expects that the pre-release care manager/post-release ECM provider (if different) schedules post-release appointments for needed services.

If an individual is deemed eligible for SMHS, the county behavioral health department and correctional facility are responsible for establishing post-release appointments for the individual. As ECM providers must provide systematic coordination of services across the physical and behavioral health delivery systems, it is expected that the pre-release care manager/post-release ECM provider (if different) work with behavioral health providers (including SMHS and DMC/DMC-ODS providers) to ensure timely connection to care.

Question 20

Question

For individuals identified as needing NSMHS, is the MCP responsible for facilitating in-reach clinical consultations with clinical providers prior to release? What requirements for BH Links must the MCP meet for individuals in need of NSMHS?

Answer

The pre-release care manager and the correctional facility must support and facilitate clinical consultations (embedded or in-reach), as needed, for individuals who qualify for NSMHS.

Roles and responsibilities for behavioral health warm linkages are outlined in Table 17 of the JI Policy and Operational Guide. In general, for those who have NSMHS needs, a handoff to the ECM provider is considered adequate for BH Links.

Question 21

Question

For which individuals will a post-release ECM provider participate in a warm handoff as a part of Behavioral Health Links?

Answer

The pre-release care manager/post-release ECM provider (if different) is expected to receive behavioral health links for individuals who have mental health and/or substance use needs and do not qualify for county-based services (SMHS/DMC/DMC-ODS).

For individuals who qualify for county-based services (SMHS/DMC/DMC-ODS), the behavioral health link should occur between the correctional facility professional and county-based professional who will continue to provide services in the community (e.g., correctional psychiatrist and county-based psychiatrist); the post-release ECM provider is expected to participate in warm handoffs on an as-needed basis. The ECM provider will be expected to coordinate care across delivery systems, as with all other ECM POFs.



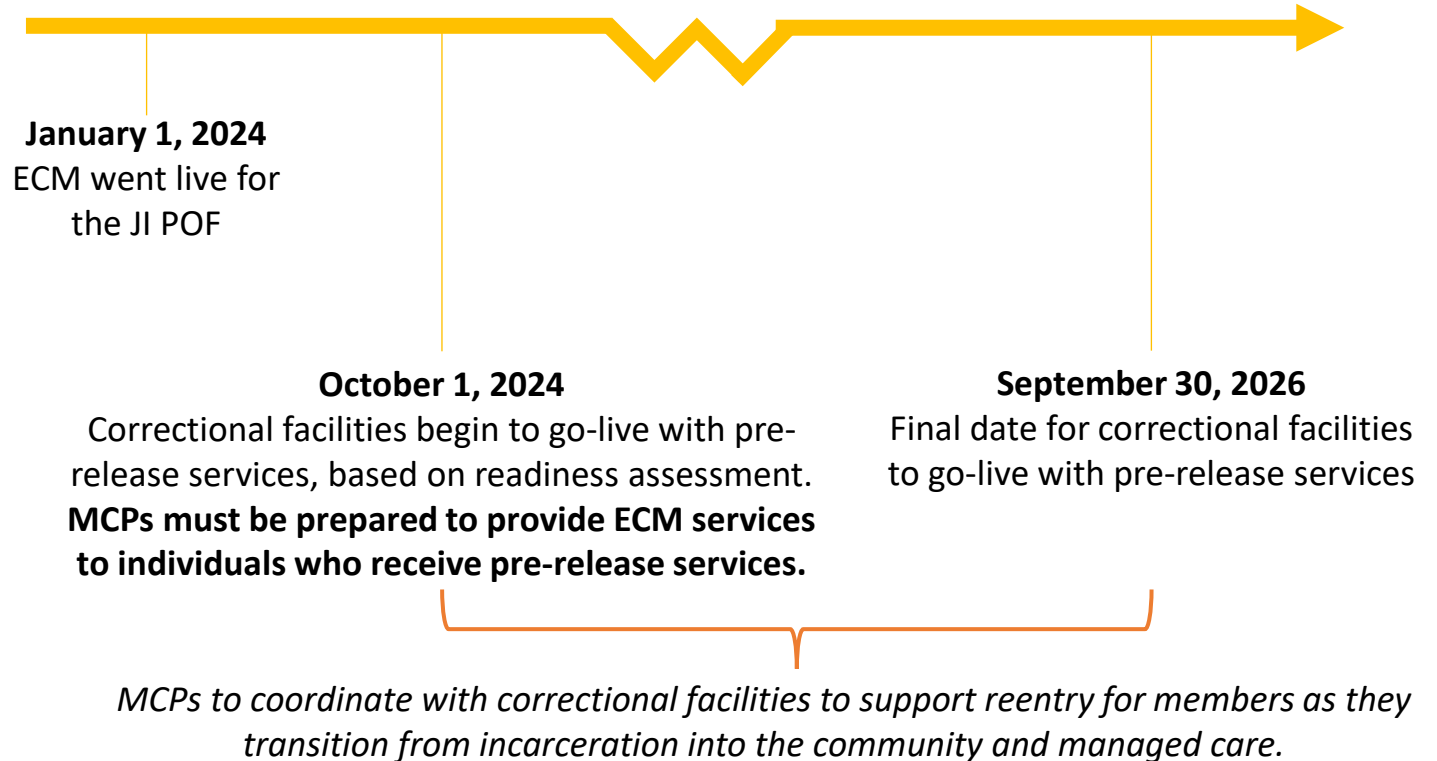
Looking Ahead

DHCS will continue to offer TA to MCPs and implementing partners over the coming months to support JI ECM Provider Network development and preparedness for pre-release service go-live.

Upcoming Milestones

- DHCS will publish **JI ECM Standard Terms and Conditions (“boilerplate”)** in Q1 of 2024.
- DHCS will publish the **Correctional Facility and Behavioral Health Agency Readiness Assessments** in the coming weeks.
- DHCS will host **All-Comer Webinars** focused on the Justice Involved Initiative throughout 2024.

CalAIM Justice-Involved Initiative Go-Live Timeline



Thank You

Please visit the DHCS Justice Involved Initiative Website for more information:

<https://www.dhcs.ca.gov/CalAIM/Justice-Involved-Initiative/Pages/home.aspx>

Please send questions to

calaimjusticeadvisorygroup@dhcs.ca.gov

