

Frequently Asked Questions (FAQs) for Medi-Cal Community Health Worker (CHW) Services for Federally Qualified Health Centers (FQHCs), Rural Health Clinics (RHCs), and Indian Health Services (IHS) Memorandum of Agreement (MOA) 638 Clinics

The following FAQs provide additional guidance and clarification to FQHCs, RHCs, and IHS-MOA 638 clinics regarding CHW services. For more information regarding Medi-Cal's CHW benefit, please also review the Department of Health Care Services' (DHCS)' general [CHW FAQ](#).

Supervising Providers

1. Can a FQHC or RHC be a supervising provider under Medi-Cal CHW policy?

No. Pursuant to the California Medicaid State Plan and current Medi-Cal policy, a supervising provider can only be a licensed provider; a hospital; an outpatient clinic as defined in Title 42 Code of Federal Regulations (CFR) section 440.90, which include a Indian Health Services (IHS) Memorandum of Agreement (MOA) 638 Clinic and Tribal Federally Qualified Health Center (FQHC); a pharmacy, a Community Based Organization (CBO); or an Local Health Jurisdiction (LHJ).

2. If FQHCs and RHCs cannot be supervising providers does that mean they cannot employ and utilize CHW services in their scope of practices?

The current Medi-Cal policy does not prohibit FQHCs and RHCs from employing CHWs and offering CHW services in their scope of practices. In fact, many FQHCs and RHCs currently employ and offer CHW services as part of their full spectrum of primary care services. However, as noted in question #3 directly below, these services are not Prospective Payment System (PPS) eligible visits.

Scoping Provisions & Reimbursement

3. Can FQHCs and RHCs receive PPS reimbursement for CHW services?

No. Pursuant to Welfare and Institutions Code (WIC) section 14132.100(g) and Attachment 4.19-B of the California Medicaid State Plan, only visits with specified physicians and other non-physician health professionals are PPS-eligible. Services delivered by CHWs are not PPS-eligible visits. However, the PPS rate is designed to reimburse FQHCs for the average projected per-visit cost of all allowable Medi-Cal services, including CHWs.

Pursuant to WIC section 14132.100(h), DHCS reimburses FQHCs and RHCs for the

difference between the payments received from Medi-Cal Managed Care Plans (MCPs) and the payments that the FQHC or RHC would have received under the PPS for eligible visits. FQHCs and RHCs are required to report all MCP payments received for the provision of CHW services on their annual reconciliation requests filed with DHCS unless such payments are managed care financial incentive payments excluded from the reconciliation process. MCPs are not required to take any action related to the PPS reconciliation process.

4. What is the process if an FQHC or RHC does not have the cost of CHW services in their PPS rate and chooses to add the service?

In cases where an FQHC or RHC does not have the cost of CHW services included in their current PPS rate and chooses to add this service, they may be eligible to apply for a Change in Scope-of-Service Request (CSOSR) under WIC section 14132.100 (e) if they meet the specific criteria outlined in the statute to accommodate the additional services.

5. Can FQHCs and RHCs receive PPS reimbursement for a CHW-only visit if rendered under the supervision of a provider that is PPS-billable?

No. To receive PPS reimbursement, the visit must include an in-person, face-to-face encounter or an interaction using a Medi-Cal approved telehealth modality (i.e., synchronous audio-visual or audio-only modalities), with a PPS-billable provider. Please note that any visits conducted using telehealth modalities must meet all of the Medi-Cal policy requirements as outlined in the [Medicine: Telehealth](#) section of the Provider Manual.

6. For FQHCs and RHCs that have pharmacy services carved out of their PPS rate, does this change anything relative to the Medi-Cal CHW benefit given the addition of pharmacies as supervising providers as of October 1, 2024?

DHCS is working on comprehensive policy guidance to clarify Medi-Cal reimbursement policies regarding CHW services rendered under the supervision of enrolled Medi-Cal pharmacy providers that are associated with FQHCs and RHCs that have pharmacy services carved out of their PPS reimbursement rate. Once finalized, this policy will be released to all FQHCs and RHCs to provide greater clarity in this space.

7. Can FQHCs or RHCs receive reimbursement for CHW services provided to managed care members if the clinic is contracted with the member's Medi-Cal (MCP)?

Pursuant to W&I Code Section 14087.325(d), Medi-Cal MCPs are required to reimburse contracted FQHCs or RHCs in a manner that is no less than the level and amount of payment that the Medi-Cal MCP would make for the same scope of services if the services were furnished by another provider type that is not an FQHC or RHC.

FQHCs and RHCs are required to report all Medi-Cal MCP payments received for the provision of CHW services on their annual reconciliation requests filed with DHCS unless such payments are managed care financial incentive payments excluded from the reconciliation process. For more information, please refer to [All Plan Letter 24-006](#).

8. Can IHS-MOA Clinics and Tribal FQHCs receive reimbursement for CHW services?

Yes. DHCS reimburses IHS-MOA Clinics and Tribal FQHC for CHW services at the Medi-Cal FFS reimbursement rate. In addition, clinic regulations regarding the four walls of a Tribal 638 clinic do not apply to CHW services that are reimbursed at the Medi-Cal FFS rate, so they may be provided within the community when they are supervised by an IHS-MOA or Tribal FQHC.

Miscellaneous

9. Whom can I contact if I have questions?

Supervising providers and CHWs may direct questions as follows:

- For questions about billing, contact DHCS' Telephone Service Center at 1-800-541- 5555.
- For Medi-Cal policy and benefits-related questions, contract DHCS' Benefits Division at CHWBenefit@dhcs.ca.gov.

10. Where can I find additional information regarding CA Bridge and behavioral health navigators relating to CHWs?

For more information regarding CA Bridge and behavioral health navigators, please visit the [CA Bridge website](#)