



# Community Health Worker (CHW) Medi-Cal Benefit

Stakeholder Meeting  
December 1, 2021

DHCS Benefits Division



# Agenda

## Agenda Items

1.	Welcome and introductory comments (10 minutes)	René Mollow, MSN, RN, Deputy Director, Health Care Benefits and Eligibility
2.	Update on informal guidance from the federal Centers for Medicare and Medicaid Services on draft SPA pages (10 minutes)	DHCS Staff
3.	Review and comment on draft State Plan Amendment pages (70 minutes)	DHCS Staff and Workgroup Members
4.	Number and Length of CHW Visits (20 minutes)	DHCS Staff and Workgroup Members
5.	Update on Tentative Schedule (5 min.)	DHCS Staff
6.	Wrap-up and Next Steps (5 minutes)	DHCS Staff



# Background on CMS Review

- DHCS asked CMS in August for guidance about allowing Community-Based Organizations (CBOs) to supervise CHWs
- The Centers for Medicare and Medicaid Services (CMS) requested in September that DHCS submit a draft SPA page covering:
  - Qualifications of CHWs
  - Supervision requirements
  - Conditions eligible for services
  - Non-covered services
  - Any amount, duration, and scope limitations



# CMS Requirements for Preventive Services

CHW services must meet the definition of preventive services in Section 440.130(c) of Title 42 of the Code of Federal Regulations:

- (c) “Preventive services” means services recommended by a physician or other licensed practitioner of the healing arts acting within the scope of authorized practice under State law to -
- (1) Prevent disease, disability, and other health conditions or their progression;
  - (2) Prolong life; and
  - (3) Promote physical and mental health and efficiency.



# CMS Informal Guidance

- Qualifications for CHWs
- Lived experiences
- Qualifying conditions to receive CHW services



# CHW Draft State Plan Amendment (SPA)

## Workgroup Discussion



# Draft SPA: CHW Services

Community Health Worker (CHW) services are preventive health services, as defined in 42 CFR 440.130(c), for:

- individuals with a chronic condition who are unable to self-manage their condition;
- who are at risk of a chronic condition or injury; or
- who have with a documented barrier that is affecting the individual's health



# Draft SPA: Inclusive Definition

“Community Health Workers” include Promotores de Salud, Community Health Representatives, Peer Health Promoters, and other non-licensed public health workers with the qualifications specified.





# Draft SPA: CHW Services

- May be provided individually or in a group setting.
- Related to a medical intervention, which may include:
  - Health education and training; the content of which must be consistent with established or recognized health care standards, related to one of the following:
    - Control and prevention of chronic or infectious diseases.
    - Behavioral health conditions.
    - Perinatal health conditions.
    - Oral health conditions.
    - Injury prevention.
  - Health promotion and coaching that includes goal setting and creating action plans as part of a health care team to address disease prevention and management.



# Draft SPA: Exclusions

- Case management/care management.
- Child care.
- Chore services including shopping and cooking.
- Companion services.
- Covered services provided in a clinic or medical facility setting except for attending a medical appointment.
- Employment services.
- Helping a recipient enroll in government programs or insurance.
- Medication, medical equipment, or medical supply delivery.
- Personal Care services/homemaker services.
- Respite care.
- Services provided prior to the recipient's care plan being finalized.
- Services that duplicate another covered Medi-Cal service.
- Socialization.



# Draft SPA: Supervision / Recommendation

- Services must be recommended by a licensed provider within their scope of practice.\*
- CHWs may not engage in any service that requires a license.
- CHWs must be supervised by either a licensed provider, clinic, hospital or an enrolled community-based organization.
- The supervising Medi-Cal provider will assume professional liability for care of the patient.

(\*Draft SPA lists specific providers; this will be changed in future versions to “licensed providers”).



# Draft SPA: Qualifications

DHCS drafted the following language related to qualifications based on responses received from the CHW survey that was shared with the stakeholder group:

- CHWs must meet at least one of the following minimum qualifications:
  - A certification that attests to specified demonstrated skills and practical training.
  - Or all of the following :
    - High school diploma or equivalent, and
    - 40 hours of training as a CHW, and
    - 1 year of experience working or volunteering as a CHW, and
    - A CHW who does not have a certificate as described above shall earn a certificate within one year of the first CHW visit provided and billed to Medi-Cal in order to continue billing for Medi-Cal CHW services.



# Draft SPA: Core Competencies

Certificate must attest to skills and practical training in:

- Communication.
- Interpersonal and relationship building.
- Service coordination and navigation.
- Capacity building.
- Advocacy.
- Education and facilitation.
- Individual and community assessment.
- Professional skills and conduct.
- Outreach.
- Evaluation and research.
- Basic knowledge in public health principles and social determinants of health, as determined by the supervising provider.



# Draft SPA: Lived Experience\*

A CHW must have at least one of the following:

- **Personal experience with a specified health condition** for which the CHW is providing services.
- **Lived experience that aligns with and provides a connection between the CHW and the community** being served, including but not limited to lived experience related to incarceration, military service, pregnancy and birth, disability, foster system placement, homelessness, and mental health conditions or substance use.
- **Shared language and cultural background** of one or more linguistic or cultural groups in the community for which the CHW is providing services.

\*These requirements can be placed in the provider manual instead of the SPA.



# Stakeholder discussion

- Feedback on draft SPA page
- Comments on guidance from CMS
  - Preventive services
  - Qualifications
  - Lived experiences
  - Health conditions



# CBOs and Supervision

- DHCS has proposed to allow licensed providers, hospitals, clinics, and community-based organizations (CBO) to supervise CHWs
- DHCS would create CBOs as a new provider type so they can enroll in Medi-Cal
  - CBOs would bill for CHW services they supervise





# Workgroup Discussion

- Are there any other enrolled Medi-Cal provider types who can supervise CHWs?
- What qualifications should DHCS require for CBOs to enroll?



# Amount, Duration, and Scope Limitations

- CMS requires that SPAs list any amount, duration, and scope limitations
  - DHCS is not required to set limitations
  - Limits on services could be exceeded with approved prior authorization



# Stakeholder discussion on limitations

- What is a normal number of CHWs services per month for a patient?
- Should DHCS establish a limit on length of a visit?
- What would be appropriate limits on the number of services per month?



# Tentative Upcoming Schedule

<b>December 1</b>	<b>Stakeholder workgroup meeting</b>
December 8	Stakeholder comments are due to DHCS on Draft SPA Page Version #1
No later than December 31	DHCS sends Draft SPA Page Version #2 to stakeholders for comment
January 15	Stakeholder comments are due to DHCS on Draft SPA Page Version #2
January 31	DHCS prepares SPA pages for second informal submission to CMS
<b>February 4</b>	<b>Stakeholder workgroup meeting</b>
February 28	DHCS receives informal comments from CMS
March 1	DHCS prepares SPA package for formal submission
March 31	Formal SPA submission



# Contact Information

Written comments are welcome!

**NEW MAILBOX!**

[CHWBenefit@dhcs.ca.gov](mailto:CHWBenefit@dhcs.ca.gov)

<https://www.dhcs.ca.gov/community-health-workers>