

## Improving the Medicaid Program for Members

February 20, 2023

### Overview

Community-Based Services Evaluation Report Medicaid Rate Reviews Prefile Legislation Dental Request for Proposals Continuous Coverage Unwind Plan Questions?

# Community Based Services Evaluation Report



#### **CBSE** Overview

The Iowa Department of Health and Human Services (Iowa HHS) contracted researchers to conduct a systemwide assessment of communitybased behavioral health, disability and aging services across the state.

■ The evaluation was completed in Dec. 2022, and the evaluation report was released on January 31, 2023.





### What principles guided the work?

- The evaluation team worked closely with invested low ans, including H H S staff and the advisory committee
- Together, they developed five guiding principles

**Equitable** Consumers can access services aligned with their needs, regardless of demographic group or location **Effective and High quality** accountable Person-centered services enable Roles and consumers to live responsibilities where they want and are delineated **CBS** in choose their care throughout Iowa and caregivers the system should be... Coordinated Proven valuable and transparent Medicaid's ability to A No Wrong Door model and conflict-free offer high-quality case management let services will increase consumers access with a reduction in appropriate information inefficient spending and services

Source: Figure I.1. Guiding principles for Iowa's CBS system (from the Evaluation Report).



### How was the work designed in Year 1?

■ Three work stream teams supported evaluation activities and developed findings and recommendations

Review and discuss policies and programs

Engage invested lowans

Conduct quantitative data analysis



### How can Iowa HHS better support people when they begin to need HCBS?

#### **Finding** Recommendation **Implement** HHS's process for streamlined managing Medicaid screening and waiver interest improved lists does not support processes to timely, efficient, or better align needs-based access to services with appropriate services. people's needs.

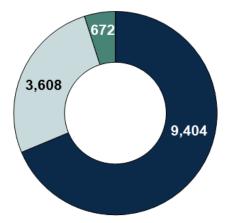


### The number of people requesting waiver slots overstates the true demand for services

- 13,000 low ans requested more than 18,000 slots across low a's waiver interest lists in 2022
- N early one in three people are on more than one waiver interest list

#### Number of people on one or more waiver interest list

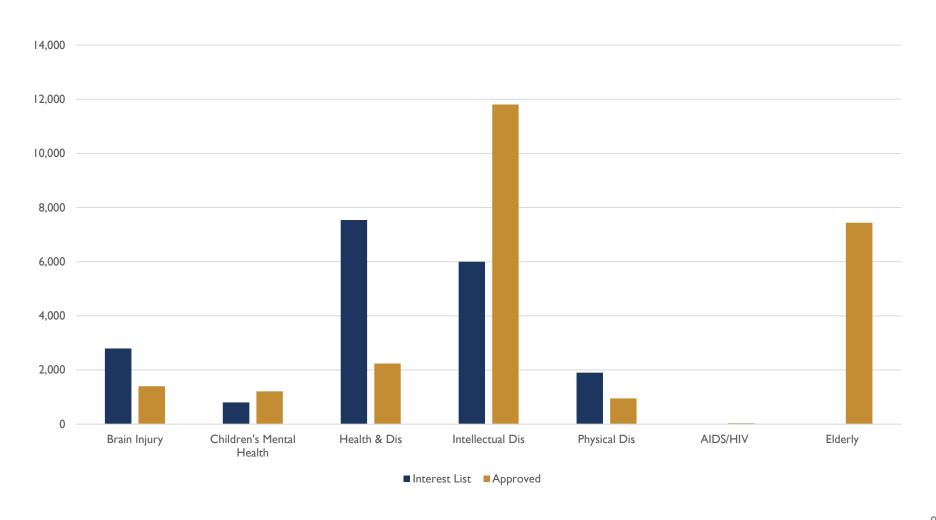
■ One waiting list □ Two waiting lists ■ Three or more waiting lists



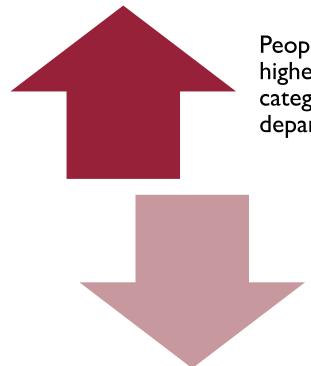
Source: Figure V.2. Point-in-time data about the lowa waiver interest lists provided by HHS in June 2022 (from the Evaluation Report).



#### **Current Interest Lists**



# Emergency department and inpatient costs are higher for those on a interest list than on a waiver



People on interest lists accrued higher costs in some payment categories, such as emergency department care and inpatient care

People on interest lists had lower total Medicaid spending per member per month (PMPM) than those on the waivers because they lacked access to HCBS

Note: We compared those on the interest list to those on a waiver; we did not compare those on an interest list, living in an institution with those on an interest list, living in the community.



### The system is not designed to coordinate MHDS and Medicaid services

About **75**% of MHDS participants were enrolled in Medicaid yet less than **5**% were on a waiver interest list.

MHDS spending is **higher** for those on a waiver or interest list compared to other Medicaid enrollees or those not on Medicaid.



#### Continued

"The system is incredibly fragmented and difficult to navigate and understand. And that's coming from someone that doesn't have a disability and has consistent transportation. I can't imagine navigating these things with additional challenges." - Listening session participant

### Medicaid enrollment and Medicaid ID verification for MHDS participants

	Regior	Α	Region C		
	Number	%	Number	%	
All participants	2,458	_	4,929	-	
Participants enrolled in Medicaid	,		,		
	1,966	79%	3,657	74%	
Participants enrolled in a waiver					
	379	15%	958	19%	
Participants on an interest list					
	73	3%	186	4%	

Source: Table V.3. MHDS data from Region A and Region B and Iowa Medicaid enrollment data (from the Evaluation Report).



### How can Iowa HHS improve waiver assessments and service offerings?

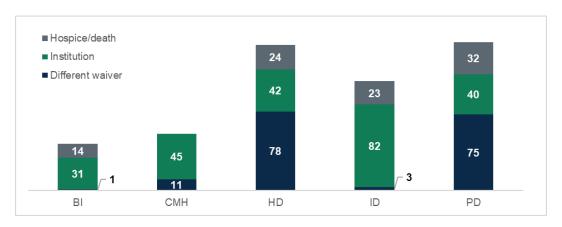
#### **Finding** Recommendation Medicaid HCBS waiver Align CBS, services often do not including align with member **Medicaid HCBS** needs, resulting in waivers, to inequity and inefficiency the needs of in accessing needed lowans. services.



### The waiver structure introduces inequities and inefficiencies into the system

- People with similar H C BS needs but different diagnoses are not able to access the same supports
- People move between waivers to try to access the services they need

#### Number of waiver exits to an institution, another waiver, or hospice/death



Source: Exhibit VI.1. Iowa Medicaid encounter data from 2018 (from the Evaluation Report). Waivers names are defined in the appendix.



### Waivers are not meeting needs

"It's not so much a challenge as it is kind of dumbfounding, the categorical nature of these waivers. We actually had to switch from the brain injury waiver to the intellectual disability waiver so we could access day habilitation. But in doing that, we lost home and vehicle modifications. And I think it's almost designed to weed out people so they just give up. But I don't give up."

Listening session participant





### How can lowa HHS enhance access to services for people already enrolled in a waiver?

#### **Finding** Recommendation Services and supports in Maximize access Medicaid and the to Medicaid HCBS broader CBS system are and other CBS difficult to navigate and supports for people with LTSS access. needs.



### There are gaps in the continuum of care

Services that are unavailable or difficult to access include:

Residential crisis services for members on the Intellectual Disability (ID) wavier with intellectual or developmental disabilities

Youth-specific crisis and psychiatric stabilization services

Services to support those with co-occurring conditions

Transportation services

Service gaps, coupled with provider shortages, create challenges for accessing services to remain the community

"Staffing shortages make it increasingly difficult for parents of children with disabilities to hold a career. Although we can get approved for services, we can't get them covered, meaning that parents have to take time off work to provide nursing care, transportation, and other services directly. The time off of work can be covered by [Family Medical Leave Act] to an extent. But that is unpaid and has a down-spiraling effect on the financial circumstances and resources for the household." - Response to online feedback form



### There is not enough support to navigate the complexities of the CBS system

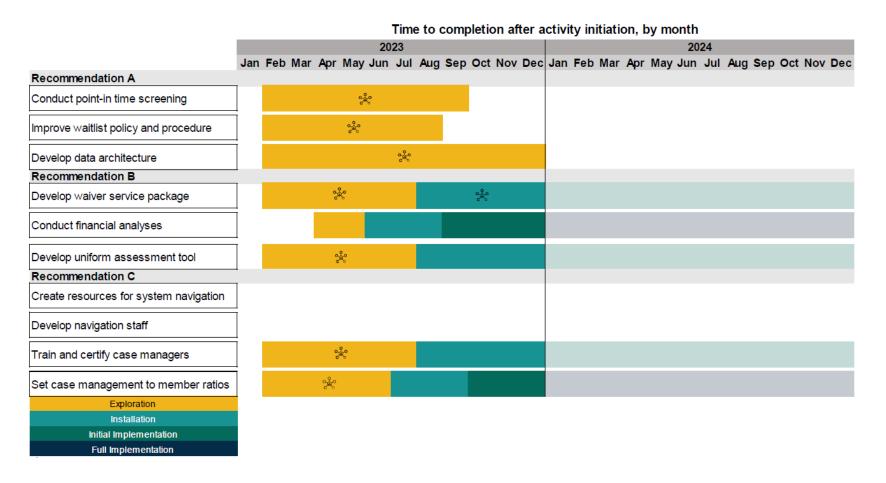
- C onsumers face challenges navigating the system, such as the inability to find clear and consistent information
- M em bers' case managers change frequently, w hich interrupts care

"I have been trying to get services [for] over two years...and have still found services lacking. In fact, most of them I can't even get information on unless I go to three or four different people on the phone each giving a different answer."

— Response to online feedback form



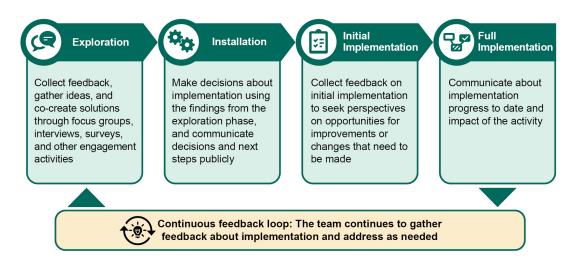
### Timeline for next steps





### How will Iowa HHS seek feedback and communicate updates to Invested Iowans?

- Each activity will move through four stages
- We will seek feedback from Invested lowans and provide updates during each stage of the feedback loop



Source: Exhibit III.1. Continuous feedback loop (from the Transformation Plan).



### Medicaid Rate Review Process



### Background on Rate Reviews

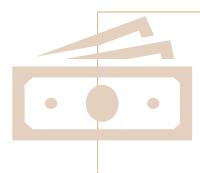
lowa Medicaid does not have a regular process established to review provider reimbursement schedules.

### Currently, the fee schedule rate reviews are conducted through:

- Legislative change directed in the HHS appropriations bill, or,
- As federal/state law dictate, or,
- When there is a programmatic need identified



### Why a Regular Rate Review is Needed



The result of not having a regular rate review process is that Medicaid provider reimbursement lags with changes in the cost of providing the service.



It can also result in reimbursement for services being misaligned with other services that may have received a targeted rate increase.



### Rate Review Findings

Provider Type	State Share at 85%	State Share at 90%	State Share at 95%	State Share at 100%	
Physician MD	(\$527,031)	\$9,893,896	\$20,308,740	\$30,729,267	
Physician DO	\$213,836	\$480,886	\$747,756	\$1,014,790	
Podiatrist	\$381,014	\$516,208	\$651,394	\$786,580	
Optometrist	\$3,437,275	\$4,037,677	\$4,637,789	\$5,238,045	
Optician	\$689,291	\$755,998	\$822,683	\$889,310	
Pharmacy	(\$649,060)	(\$16,510)	\$595,142	\$1,218,929	
Independent Lab	(\$1,216,047)	(\$593,694)	\$29,057	\$651,309	
Medical Supplies	\$144,104	\$1,036,798	\$1,929,343	\$2,820,885	
Clinic	(\$117,719)	(\$84,419)	(\$49,380)	(\$14,986)	
Physical Therapist	\$418,121	\$621,794	\$824,662	\$1,028,322	
Chiropractor	(\$94,112)	\$212,174	\$518,102	\$824,391	
Audiologist	(\$1,237)	\$1,555	\$4,346	\$7,139	
Rehab Agency	(\$773,072)	(\$356,321)	\$59,477	\$475,651	
Community MH	(\$757,868)	\$536,704	\$1,864,411	\$3,192,499	



### Rate Review Findings

Provider Type	State Share at 85%	State Share at 90%	State Share at 95%	State Share at 100%
Family Planning	(\$4,167)	\$35,726	\$74,499	\$114,386
Psychologist	\$311,563	\$461,854	\$612,129	\$762,388
Screening Center	(\$178,905)	(\$169,908)	(\$160,921)	(\$151,919)
Occupational Therapist	\$64,692	\$105,424	\$146,064	\$186,777
Maternal Health Center	(\$60,113)	(\$57,951)	(\$55,791)	(\$53,629)
Certified Nurse Midwife	\$3,122	\$5,233	\$7,336	\$9,447
CRNA	(\$23,895)	(\$9,773)	\$4,341	\$18,471
Clinical Social Worker	\$24,460	\$87,388	\$150,182	\$213,102
Nurse Practitioner	\$915,402	\$1,361,675	\$1,807,568	\$2,253,703
Lead Inspection Agency	\$10,221	\$11,629	\$13,040	\$14,449
Behavioral Health Behavioral Health Intervention	\$7,219,530	\$8,954,235	\$10,549,522	\$12,162,899
Srvs	\$1,872,158	\$2,597,653	\$3,296,439	\$3,995,240
Assertive Comm Treatment	(\$302,919)	(\$184,337)	(\$66,003)	\$52,578
Physician Assistant	\$29,691	\$133,909	\$238,135	\$342,331



### Rate Review Findings

Provider Type	State Share at 85%	State Share at 90%	State Share at 95%	State Share at 100%
Independent Speech	(\$5,636)	\$5,523	\$16,666	\$27,806
Public Health Agencies	\$12,403	\$21,126	\$29,887	\$38,624
Crisis Response Services	(\$12,677)	(\$4,783)	\$3,059	\$10,895
Total	\$11,022,425	\$30,325,883	\$49,581,057	\$68,874,048

 Benchmarked to Medicare, RJ Health Care Average Wholesale Price, or surround state Medicaid rate

#### RESIDENTIAL SUBSTANCE USE TREATMENT SERVICES

State Dollars	2022	85% of	90% of	95% of	100% of
	Payments	Benchmark	Benchmark	Benchmark	Benchmark
Modeled Payments	\$6,343,914	\$10,005,026	\$10,587,083	\$11,168,948	\$11,751,005
Difference from 2022 Payments		\$3,661,112	\$4,243,169	\$4,825,033	\$5,407,091
Incremental Difference for each payment					
level			\$582,057	\$581,864	\$582,057

 Benchmarked to surrounding state Medicaid residential substance use treatment rates



### Prefile Proposal



#### Components

#### Lien Recovery

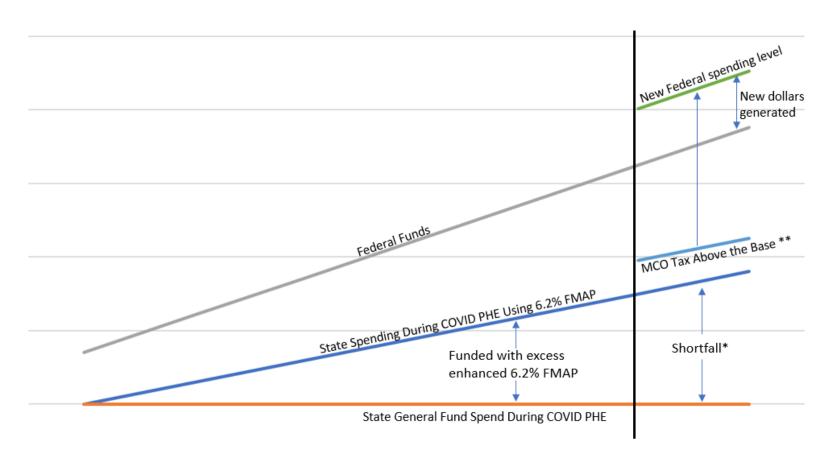
 Bringing lowa into compliance with federal law, to ensure MCOs have clear third-party recovery rights, to expand and clarify lowa Medicaid's thirdparty recovery rights and to strengthen third party recovery related to minors.

# Medicaid Managed Care Premium Tax

 Aligns Medicaid Managed Care with other insurance carrier requirements for premium tax obligations to the state.



### Illustration of Managed Care Premium Options





### Dental Request for Proposal





#### Overview

- Currently, low a Medicaid dental carrier contracts are "open contracts" and not competitively procured through Request for Proposal.
- This practice does not align with our other managed care contracts for physical, behavioral, and long-term services and supports.

### Challenges

Lack of choices

Instability of contracts/dental coverage

Lack of innovation in manages care practice

Outdated contract terms

Lack of competition

Misaligned with lowa Medicaid's vision for integrated healthcare



### What Medicaid Wants to Accomplish with an RFP

To align dental plans with MCO contract requirements, oversight, accountability and procurement style.

Incent innovation and high performance.

Allow flexibilities in dental reimbursement.

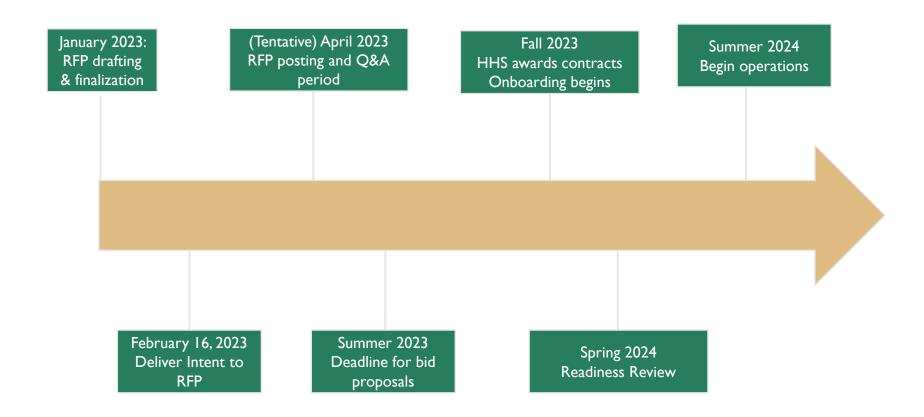
Alignment in populations covered to increase continuity as members transition eligibility groups.

Better coordination of care for members.

Increasing member choice.



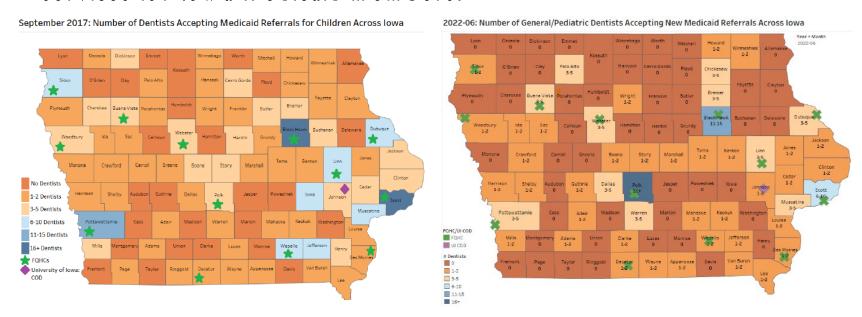
#### **Timeline**





### Dental Stakeholder Workgroup

Primary goal: increasing access to medically necessary dental services for low a Medicaid members.



In addition to the above, HRSA has designated 9 geographic areas in Iowa as dental health professional shortage areas.



### Dental Stakeholder Workgroup (continued)

- O ne initiative alone will not get the program to this goal
- Initiatives under examination and consideration:

Reducing the adult dental services available to more align with other state models  Leverage funds from that service menu reduction to invest in increased rates for preventative services

Change methodology to authorize/reimburse for orthodontia services

Increase ability of dental hygienists, dental assistants and dental therapist practitioners to fill access needs

- •Allow registered dental hygienists to bill directly
- Consider adding dental therapists to the state dental network

In 2011, the Centers for Medicare and Medicaid (CMS) released an oral health strategy that identified the principal barriers to care – these remain barriers to care in lowa:

- Limited availability of dental providers
- Low reimbursement
- Administrative burdens
- Missed appointments
- Transportation



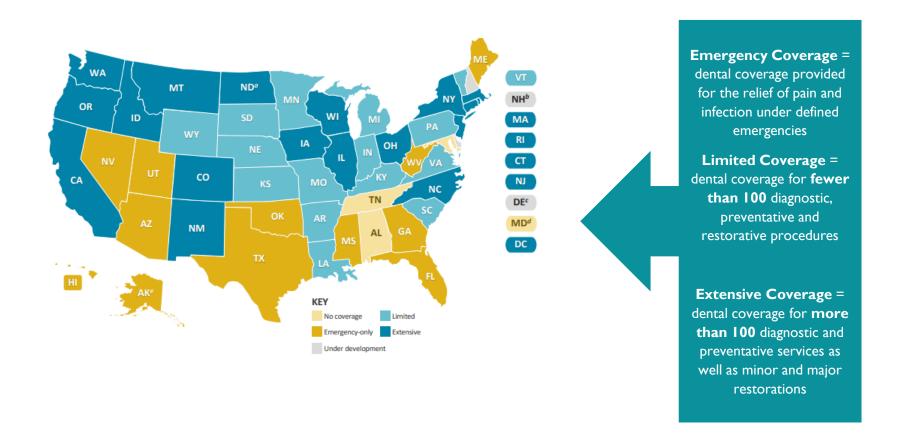
### **Dental Rates**

Provider Type	State Share at 85%	State Share at 90%	State Share at 95%	State Share at 100%
Diagnostic	\$920,868	\$1,223,787	\$1,526,967	\$1,829,702
		\$1,884,497	\$2,255,374	\$2,625,838
Preventative	\$1,514,292			
Restorative	\$1,072,574	\$1,609,560	\$2,146,609	\$2,683,494
Major Restorative	\$132,790	\$432,868	\$732,927	\$1,033,006
Orthodontics	(\$2,561,953)	(\$2,514,765)	\$(2,467,570)	\$(2,420,374)
Other	\$208,745	\$274,126	\$339,423	\$404,722
Total	\$1,287,316	\$2,910,074	\$4,533,729	\$6,156,388

Benchmarked to surrounding state Medicaid dental rates



### Adult Dental Benefit Comparison





### Dental Access Approaches

2019 report by the Association of State and Territorial Dental Directors - identified expanded use of dental hygienists, dental assistants, and dental therapists as a best practice that states should consider.

States that have implemented dental therapy to increase access to care:

Alaska

**Minnesota** 

Oregon

Vermont

**Washington** 

Arizona

Michigan

Connecticut

Idaho

Nevada

2017 report published by University of Washington concluded increased use of dental therapy by the Yukon Kuskokwim communities was associated with:

- More pediatric preventative services utilized
- Fewer extractions of front teeth for children under the age of 3, and
- Fewer permanent tooth extractions for adults 18 years and older.

Arizona passed a bill in 2018, with bipartisan support, to include dental therapy as an option for individuals in the state who are challenged with access to dental care.

The goal of leveraging multiple practitioner types is not to reduce traffic to dental offices – it is to **improve preventative/routine access for our members** and provide space for dentists to work at the top of their scope of practice.

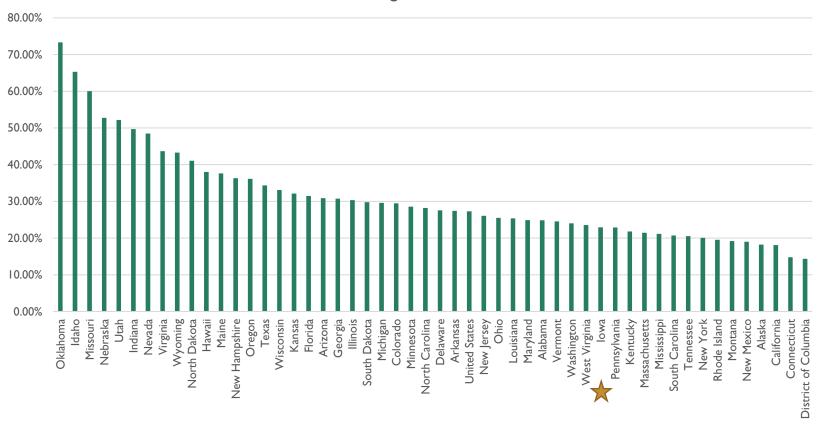


# Continuous Coverage Unwind Plan



### State Comparison of Medicaid Enrollment

% Change Since 2019





### End of the Continuous Coverage Requirement (Consolidated Appropriations Act Changes)

President Biden signed the Consolidated Appropriations Act into law on December 29, 2022.

'De-linked' the Medicaid continuous coverage requirement from the federal PHE

Set a final date of the continuous coverage requirement of March 31, 2023.

Tiered the ending of additional funding

- 6.2% through March 2023
- •5% through June 2023
- 2.5% through September 2023
- 1.5% through December 2023

Additional eligibility processing requirements

- Adds strict reporting guidelines and possible sanctions for procedural reasons
- Adds extra follow-up on returned mail



## Redistribution Plan for 12-month Unwind Period

- I. Prioritizing work on redeterminations for those who have not had a successful renewal completed in the past 12 months.
- Redistribution plan that will 'front load' redeterminations in the first few months following end of the continuous coverage requirement.



### Unwind Dashboard

A public dashboard is available on the lowa HHS website: https://dhs.iowa.gov/dashboard\_welcome



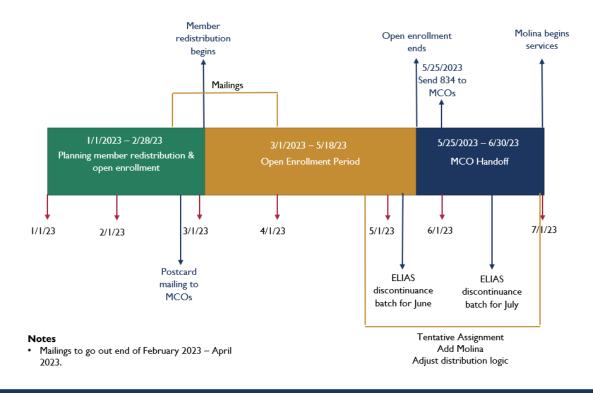
- Medical assistance enrollments
  - Medicaid enrollment from 2019 and ongoing.
- Medical assistance applications
  - Comparison of total applications received from 2019 and ongoing

- Medical assistance renewals
  - Renewals due
  - Renewals processed
- Unwinding workload
  - Cases and members maintained because of continuous coverage requirements

<sup>\*</sup>Branding will change to new HHS standards in 2023.

### Other Considerations for the Unwind

- MCO Open Choice period
  - New MCO (Molina) is being onboarded which is including an open choice period for all MCO members at the same time the unwinding period is starting





### Resources to Help Members with Renewals

#### **Monthly Townhalls**

Medicaid Town Halls | Iowa Department of Health & Human Services

#### Website

Medicaid Member Services | Iowa Department of Health & Human Services

#### **Unwind**

Unwind: The End of the Continuous Coverage Requirement | Iowa Department of Health & Human Services

#### **Key Messages to Share with Members**

- 1. Check your mail for a notice of a new certification period or a new review form.
- 2. Complete and return your renewal form in a timely manner.
- 3. If additional information is requested, provide that information to lowa Medicaid in a timely manner.



### Questions?



### Appendix





### CBSE: Accomplishments in Year One

### **Iowa CBS evaluation by the numbers**



45

interviews with key informants

including HHS administrators, case managers, and frontline providers



8.5 million

claims records

for Medicaid members receiving HCBS in 2018 and 2019



46

conversations

with consumers, family members, caregivers, and providers through listening sessions and interviews



**379** 

responses

to an online feedback form



68

counties

of the 99 in Iowa represented across our community engagement activities



15

experts

on a Community Advisory Committee offering sustained input to our evaluation activities, findings, and recommendations

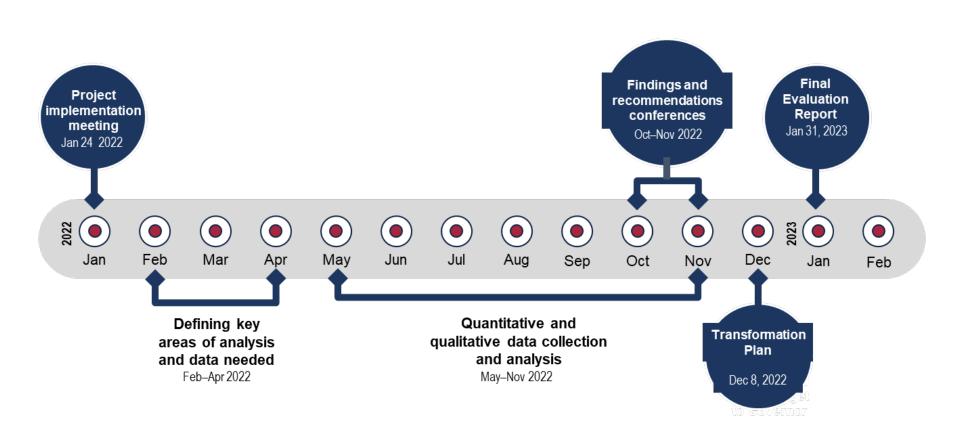


300+

policy and program documents

reviewed from lowa and other states

### **CBSE:** Timeline



### Continuous Coverage Unwind Timeline

**Blue Phase** 

**Red Phase** 

lowa's 12-month unwind

**Yellow Phase** 

lowa's 12-month

**Green Phase** 

Date	Prior to January 1, 2023	January I, 2023 – April I, 2023	period: after the member receives their renewal packet in the mail.	unwind period: If a member receives notice that they are no longer eligible for Medicaid.			
Description	Updating member information to have the correct address, phone, and email contacts to reach members with important updates about their health coverage.	Preparing members and stakeholders for the lowa Medicaid unwinding period. This includes explaining changes that will resume normal Medicaid operations, timelines for these changes, and how that might impact them.	Helping members successfully fulfill their renewal requirements to ensure that their annual Medicaid eligibility renewal is completed accurately. This will help to prevent members from losing their Medicaid eligibility for procedural reasons.	Specifically for individuals that were disenrolled from Medicaid based on their annual renewal, this phase will focus on providing information, resources, and processes on obtaining alternative health coverage after disenrollment.			
Note: Phases Plue Ped and Vallow all assur during lowe's full 12 month unwinding period but are different for each							

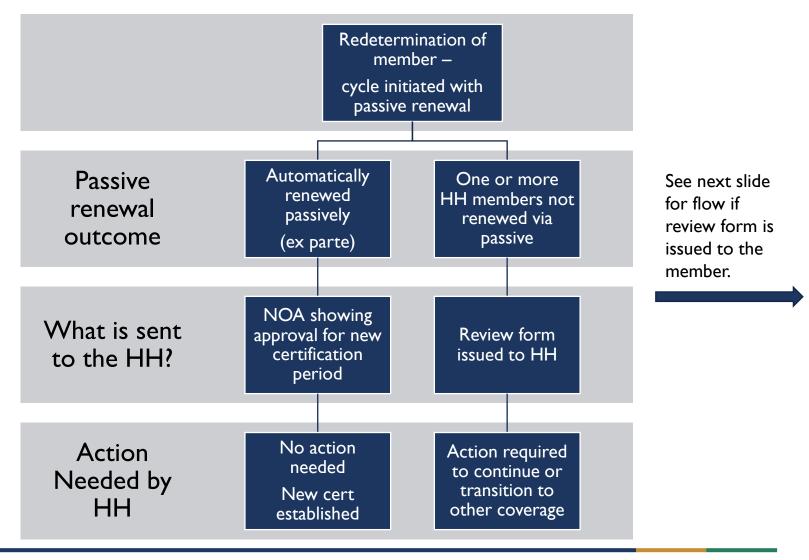
Note: Phases Blue, Red, and Yellow all occur during lowa's full 12-month unwinding period but are different for each member based on their scheduled renewal month.

### Communications Materials

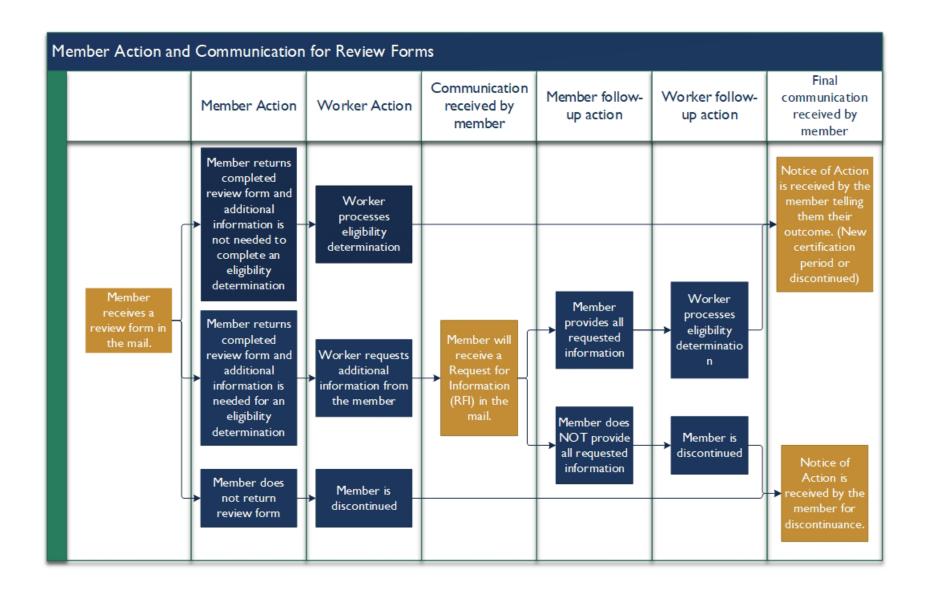


- low a Medicaid will utilize the following resources:
  - Leverage M C O s, stakeholders and other partners for help in critical messages
  - O ne-page stakeholder guide & contacts
  - Social media messaging and reminders
  - Training M ember Services on the phased communications plan
  - Frequently Asked Questions
  - Visual dashboards
  - U p dated informational letters
  - Targeted email notifications
  - Webpage campaign including website updates, unwind resources, guides, toolkits and scheduled webinars
  - E-New sletter updates

### Member Communication at Passive Renewal









### **Unwind: Timeline**

**MOE Ends** 

(March 31, 2023)

Remainder of 12-

month unwind period

(May 2023 - March

Continue implementation of

communication plan until all

complete for the 12-month

unwinding activities are

Phase III and IV of

unwinding period.

**Month Following** 

**MOE End** 

Continue to focus

initiate Phase IV of

completing renewals and

communication plan for those

that are found ineligible for

on members

Medicaid.

		(February 2023)		(April 2023)	2024)
Factors	President Biden signs Consolidated Appropriations Act into law, which de-links the continuous coverage requirement from the end of the PHE	Continue to maintain Medicaid for all enrollees while planning for 12-month unwinding period.	Last month of continuous coverage requirement.  6.2% enhanced federal match is decreased to 5%.	Begin returning to normal Medicaid operational processes.	Enhanced federal match rate incrementally decreases:      5% effective April 2023      2.5% effective July 2023      1.5% effective Oct 2023      No match starting Jan 2024
Eligibility Renewals	Continue:  • Ex parte renewals  • Attempting renewal when acting on change in circumstances  • Attempting renewals when completing SNAP recertifications  Finalization of redistribution of renewals  Development of eligibility	Begin ex parte process for renewals that may result in a discontinuance after continuous coverage requirement ends.  Review forms will be issued for those that did not successfully get renewed during the ex parte process for those with renewal month in the trigger/kick-off month (first	Most review forms will be received by households (whose renewal is due in the trigger/kick-off month).  Iowa Medicaid will start to receive some completed renewal forms back.	Review forms (for those with a renewal in the trigger/kick-off month) are due on the 5th of this month.  First discontinuances will occur this month for coverage effective the following month.	Renewal cycle continues each month for members with upcoming renewals.  Monitoring and adjusting redistribution of renewals based on CMS guidelines.

Phase III begins. Ensure

information for accurate

eligibility determinations.

members complete

their renewal and

provide requested

# Communication

period

### Stakeholder outreach and toolkit development.

staff training for unwinding

December 2022 &

January 2023

Continue Phase I of communication plan. Campaign for updated contact information from members and initiate Phase II of the communication plan.

month after the continuous

coverage requirement ends).

**Month before** 

**MOE Ends** 

### Unwind: Helpful Tips for Discontinued Members

- A ssistance in enrolling at <u>healthcare.gov</u>
- Find Local Help
  - Search for local agent/broker or assister
  - A llows members to select assisters, including assisters with specialized services such as assistance with deaf/hearing impaired or low-income populations.
  - Those potentially eligible for Medicare can contact SHIIP/ID for help and information
    - Find a SHIIP Counselor | SHIIP-SMP (iowa.gov)

