

JOINT APPROPRIATIONS COMMITTEE ON HEALTH AND HUMAN SERVICES

NC Department of Health and Human Services

Medicaid Transformation:

Tailored Plan Update

Kody H. Kinsley, Secretary

March 1, 2023

Tailored plans modernize existing managed care and serve individuals with complex care needs.

- Tailored Plans modernized six existing managed care organizations (LME/MCOs) to integrate
 physical and behavioral health care for Medicaid beneficiaries with complex mental health,
 substance use, or I/DD and TBI needs
 - Currently, these individuals received physical health services fee-for-service, and behavioral health and I/DD services from LME/MCOs
- Plans will serve 143,000 people with complex care needs.
 - By definition, all members have specialized requirements for BH/IDD.
 - Additionally:
 - 16% of individuals have >4 chronic physical health conditions.
 - 27% had 2 or more non-behavioral health ED visits in prior 18 months
 - 48% receive some behavioral health services in their primary care home
- They will provide the same services as Standard Plans and will provide additional specialized services for this population that are not covered in Standard Plans

To ensure health and safety of beneficiaries, we're delaying launch until October 1.

- Our priority has always been ensuring a smooth transition to Tailored Plans for the people they will serve. That means on Day 1, people get care and get prescriptions, and their providers get paid.
- Because Tailored Plans will serve a medically complex population with specialized care needs, there is increased need to minimize disruption of care.
- While the LME/MCOs have made significant progress, they aren't yet consistently where they need to be statewide to achieve that goal.
- To make sure that people can seamlessly receive care on day 1, we are delaying the launch of Tailored Plans until October 1.

There are three key issues driving the delay.

- 1. 20,000 to 30,000 of the Tailored Plans members would **not have their current primary** care provider in network.
 - Members would be assigned PCPs with whom they had no care relationship
 - Members might be assigned to PCPs more than 45 min/30 miles away
 - Because whole systems have not contracted, extended care teams for specialty care would likely be out of reach.
 - Members would likely have trouble scheduling non-emergency medical transport.
- Latest Department operational system testing showed variation across plans.
 - Members could likely experience difficulty filling prescriptions on Day 1
 - Providers and Pharmacists would likely experience invalid denials or issues submitting claims
 - Providers and Pharmacists would likely have difficulty getting paid in a timely way
- While the Department has and can employ several mitigation strategies, we have insufficient legal tools if a single plan were to fail. If all can't go live, none can go live.

NCDHHS & LME/MCOs have made significant investments of resources for readiness, including mitigation strategies.

- This builds on extensive preparation efforts:
 - Extensive claims demonstration testing
 - 3,300 criteria reviewed and 134 on-site readiness reviews.
 - 1,600 tailored plan policies created and reviewed.
- The Department has considered several policy strategies to lessen the risk of harm, but they aren't sufficient to overcome risks.
 - Allowing out of network billing; no guarantee providers will participate.
 - Relax and extend existing medical and pharmacy prior authorizations.
 - Flexibility for members to change PCPs while additional contracting is underway
- The Department and LME/MCOs worked to prepare additional resources to reduce risk.
 - Clinical and payment escalation procedures: provider/beneficiary hotlines, etc.
 - Deployment of state resources to manage operational systems.

Key modernization and integration efforts already moved forward.

Tailored Care Management (TCM)

- Beneficiaries will have a designated care manager with a multidisciplinary care team to provide whole-person care management that addresses physical health, behavioral health, I/DD, traumatic brain injuries (TBI), pharmacy, long-term services and supports (LTSS) and unmet health-related resource needs
- TCM began rollout on December 1 and continues to expand
- TCM providers contract with the LME/MCO for assignment and payment
- Members are assigned to a TCM provider or to the LME/MCO for TCM
 - Members have choice if they prefer a specific provider
 - 71 Tailored Care Management providers certified by DHHS

1915i Services (pending CMS approval)

- On path to launch 1915i services, which are key to those living with disabilities.
- Services: Community Transition, Respite, Community Living and Support, Supported Employment, Other services to support those with a primary diagnosis of mental illness or substance use disorders.

Appendix

Stakeholder Experience on Day 1

	Experience	Alliance	Eastpointe	Partners
	Projected TP Enrollment	Approximately 35,200 members	Approximately 13,400 members	Approximately 27,100 members
MEMBER	PCP Choice,	~11,000 members unable to select their historical primary care provider.	~2,300 members unable to select their historical primary care provider.	~8,600 members unable to select their historical primary care provider.
	Assignment, & Mailings	Due to inadequate PCP network, members might be assigned to PCPs more than 45 min/30 miles away	Due to inadequate PCP network, members might be assigned to PCPs more than 45 min/30 miles away	Due to inadequate PCP network, members might be assigned to PCPs more than 45 min/30 miles away
	NEMT Service Line and NEMT Outreach	Expecting no issues, members can schedule NEMT in reasonable time	Expecting issues, many members would have trouble scheduling NEMT due to lack of contracted providers	Expecting mild issues, some members would have troubling scheduling NEMT due to lack of contracted providers
	PCP Panel Management	Primary Care Providers will see ~11,000 new members assigned to them.	Primary Care Providers will see ~2,300 new members assigned to them.	Primary Care Providers will see ~8,600 new members being assigned to them.
		No claim submission issues identified.	Only one minor issue with claims	Expecting some issues, claims approach

PROVIDER

	Management	them.	new members assigned to them.	new members being assigned to them.
ER	Provider Payments and Authorizations	 No claim submission issues identified. Based on testing, some providers may experience invalid denials 	 Only one minor issue with claims submission, which is being corrected Based on testing, some providers may experience reduce payments 	Expecting some issues, claims approach has changed, has not been fully tested Based on testing, some providers may experience invalid denials
	Pharmacy Point of Sale	Pharmacists will likely get paid on time.	Pharmacists will have difficulty getting paid	Pharmacists may not get paid on time

^{*}As of February 20, 2023

Stakeholder Experience on Day 1

MEMBER

	Experience	Sandhills	Trillium	Vaya
	Projected TP Enrollment	Approximately 19,100 members	Approximately 24,500 members	Approximately 24,400 members
	PCP Choice, Assignment, & Mailings	 ~5,000 members unable to select their historical primary care provider. Due to inadequate PCP network, members might be assigned to PCPs more than 45 min/30 miles away 	 ~4,300 members unable to select their historical primary care provider. Due to inadequate PCP network, members might be assigned to PCPs more than 45 min/30 miles away 	 ~4,400 members unable to select their historical primary care provider. Due to inadequate PCP network, members might be assigned to PCPs more than 45 min/30 miles away
	NEMT Service Line and NEMT Outreach	Expecting moderate issues, some members would have trouble scheduling NEMT due to lack of contracted providers	Expecting moderate issues, some members would have trouble scheduling NEMT due to lack of contracted providers	Expecting moderate issues, some members would have troubling scheduling NEMT due to lack of contracted providers

PROVIDER

PCP Panel Management	Primary Care Providers will see ~5,000 new members being assigned to them.	 Primary Care Providers will see ~4,300 new members being assigned to them. Primary Care Providers will see ~4,400 new members being assigned to them.
Provider Payments and Authorizations	 Expecting significant issues. Only plan that has not started portal claims testing Provider are likely to experience high volume of invalid claim denials. 	 Expecting moderate issues; claims testing is behind schedule, low pass rate Providers may experience invalid denials or underpayment Expecting no significant issues with claims submission. Some providers may experience invalid denials or underpayments.
Pharmacy Point of Sale	Pharmacists will likely get paid on time.	 Expecting mild issues but pharmacies will likely get paid on time.

^{*}As of February 20, 2023