

MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES

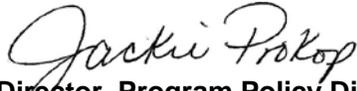
NOTICE OF PROPOSED POLICY

Public Act 280 of 1939, as amended, and consultation guidelines for Medicaid policy provide an opportunity to review proposed changes in Medicaid policies and procedures.

Please review the policy summary and the attached materials that describe the specific changes being proposed. Let us know why you support the change or oppose the change.

Submit your comments to the analyst by the due date specified. Your comments must be received by the due date to be considered for the final policy bulletin.

Thank you for participating in the consultation process.



Director, Program Policy Division
Bureau of Medicaid Policy and Health System Innovation

Project Number: 1606-LHD	Comments Due: June 17, 2016	Proposed Effective Date: August 1, 2016
---------------------------------	------------------------------------	--

Mail Comments to: Nancy Gurzick
Bureau of Medicaid Policy and Health System Innovation
Medical Services Administration
P.O. Box 30479
Lansing, Michigan 48909-7979

Telephone Number: 517-373-3194 **Fax Number:** 517-335-5136
E-mail Address: gurzickn@michigan.gov

Policy Subject: Revisions to Local Health Department Outreach Activities

Affected Programs: Medicaid, Healthy Michigan Plan, MIChild

Distribution: Local Health Departments

Policy Summary: This policy revises Medicaid outreach requirements and clarifies Title XIX of the Social Security Act requirements for Medicaid administrative expenditures to be claimed for federal matching funds.

Purpose: The purpose of this policy is to notify local health departments of revised requirements for claiming outreach activity costs.

Proposed Policy Draft

Michigan Department of Health and Human Services
Medical Services Administration

Distribution: Local Health Departments

Issued: July 1, 2016 (Proposed)

Subject: Revisions to Local Health Department Outreach Activities

Effective: August 1, 2016 (Proposed)

Programs Affected: Medicaid, Healthy Michigan Plan, MIChild

The purpose of this policy is to notify Local Health Departments (LHDs) of revised requirements for claiming outreach activity costs. Title XIX of the Social Security Act authorizes federal grants to states for a proportion of expenditures for medical assistance under an approved Medicaid state plan, and for expenditures necessary for administration of the state plan. In order for Medicaid administrative expenditures to be claimed for federal matching funds, the following requirements must be met:

- Costs must be “proper and efficient” for the state’s administration of its Medicaid state plan (Section 1903(a)(7) of the Act).
- Costs related to multiple programs must be allocated in accordance with the benefits received by each participating program (OMB Circular A-87, as revised and now located at 2 CFR 200) and assign costs based on the relative benefit to the Medicaid program and the other government or non-government programs.
- Costs must be supported by an allocation methodology in the state’s approved Public Assistance Cost Allocation Plan (42 CFR 433.34).
- Costs must not include funding for a portion of general public health initiatives that are made available to all persons, such as public health education campaigns.
- Costs must not include the overhead costs of operating a provider facility.
- Costs must not duplicate payment for activities that are already being offered or should be provided by other entities, or paid through other programs.
- Costs may not supplant funding obligations from other federal sources.
- Costs must be supported by adequate source documentation.

All claimable outreach assistance activities must be directed to Medicaid beneficiaries and may only include:

- Outreach and application assistance
- Referral, coordination and monitoring assistance
- Transportation and translation assistance

SIX APPROVED OUTREACH CATEGORIES

1. Medicaid Outreach and Public Awareness

Activities associated with informing eligible or potentially eligible individuals about Medicaid covered benefits and how to access them. This includes providing information about Early and Periodic Screening, Diagnosis and Treatment (EPSDT) services or making referral for such services. This category of outreach also includes coordinating and presenting information about Medicaid through media resources, health fairs and other community forums.

Examples of activities in this category include, but are not limited to:

- Informing families, parents and community members about the Medicaid program, Medicaid covered services, and how to obtain Medicaid preventive services, through community presentations and other public venues.
- Utilizing media resources to educate families on the process of completing a Medicaid application form and how to access services.

2. Facilitating Medicaid Eligibility Determination

Activities related to assisting potential Medicaid eligible individuals in applying for Medicaid benefits. This includes referring individuals to the local Michigan Department of Health and Human Services (MDHHS) office for determination of benefits. The mihealth card does not contain eligibility information and does not guarantee eligibility. Eligibility must be verified through the Community Health Automated Medicaid Processing System (CHAMPS).

Examples of activities in this category include, but are not limited to:

- Explaining the Medicaid program to individuals or families at the LHD, providing a Medicaid application form and assisting an individual complete a Medicaid application form.
- Helping a potential eligible gather and collect documentation to support a Medicaid application.

3. Program Planning, Policy Development and Interagency Coordination Related to Medical Services

Collaboration between the LHD and other agencies to assure the delivery of Medicaid-covered services. This includes tracking requests for referrals and coordinating services with the Medicaid Health Plans.

Examples of activities in this category include, but are not limited to:

- Development of health programs and services targeted to the Medicaid population.
- Activities performed in collaboration with agencies or organizations outside of the LHD to assure the delivery of Medicaid covered medical/dental/mental health services to Medicaid beneficiaries.
- Activities to enhance improve or streamline health care service delivery systems in the community.
- Representing the LHD on a committee or task force.

4. Referral, Coordination, and Monitoring of Medicaid Services

Development of program resources for program specific services provided at LHDs. Coordination of programs and services at the health department and/or other agencies and monitoring delivery of Medicaid services within the health department and/or other agencies are included.

Examples of activities in this category include, but are not limited to:

- Locating individuals with potential health-related needs.
- Developing referral sources for the health department for other health agencies providing Medicaid services to which families may be referred.
- Coordinating programs and services at the LHD.
- System-wide monitoring and coordination of services; not beneficiary-specific
- Coordination or monitoring of services for the individual beneficiary.

5. Medicaid-Specific Training on Outreach Eligibility and Services

Outreach activities that focus on coordinating, conducting, or participating in training and seminars for staff or contractors regarding general Medicaid information, the benefits of the program and how to assist families in accessing Medicaid services. These include training that enhances early identification, screening and referral of children and adolescents for EPSDT services. This category includes development and presentation of training modules regarding Medicaid eligibility and benefits to LHD staff.

Examples of activities in this category include, but are not limited to:

- Conducting or participating in training events and seminars regarding general Medicaid information.
- Training on the benefits of the Medicaid program, how to assist families in accessing Medicaid eligibility and services, and how to more effectively refer individuals for services.
- Training activities to help connect individuals and families to the Medicaid program or to Medicaid services.

6. Arranging for Medicaid-related Transportation and Provision of Medicaid-related Translation

Assisting an individual to obtain transportation for Medicaid-related services. This includes scheduling or arranging transportation. ***NOTE: This does NOT include activities that contribute to the actual billing of transportation as a medical service, nor does it include accompanying the Medicaid-eligible individual to Medicaid services as an administrative activity.***

Examples of activities in this category include, but are not limited to:

- Providing translation services related to a Medicaid-covered service when not included and paid for as part of a medical assistance service.
- Arranging translation services that assist an individual to understand necessary care and treatment and/or assist family members to understand how to provide necessary medical support and care to an individual.
 - The statute authorizes the increased federal matching rate for interpretation and translation services provided in connection with the enrollment, retention or use of services by children, or family members of these children.
 - Expenditures associated with the provision of translation and interpretation services to Medicaid enrollees that are not eligible for the increased matching rate may still be reimbursable at the standard 50 percent Medicaid administrative matching rate, or as part of the rate paid for a medical service.
 - This category also includes the arranging for or providing of translation/interpretation services to enable an individual to access Medicaid health-related services. (*CMS Informational Bulletin, April 26, 2011.*)

The appropriate claiming determination and maintaining documentation of all Medicaid outreach activities is the responsibility and judgment of the provider and/or health department.