

May 9, 2016

<Provider Name>
<Provider Address 1>
<Provider Address 2>
<Provider City> <State> <zipcode5-zipcode4>

Dear MI Choice Waiver Director:

RE: MI Choice Level of Care Determination Process

The Michigan Department of Health and Human Services (MDHHS) recently moved the Michigan Medicaid Nursing Facility Level of Care Determination (LOCD) tool to the Community Health Automated Medicaid Processing System (CHAMPS). The purpose of this letter is to clarify current expectations regarding the LOCD process for MI Choice waiver agencies.

The Michigan Medicaid Nursing Facility LOCD Process Guidelines promulgated in 2004 states:

“Applicants who qualify for Nursing Facility Level of Care Programs through Door 3, Door 4, or Door 5 of the Michigan Medicaid Nursing Facility Level of Care Determination may have unstable medical conditions with short-term support needs. Applicants who do not qualify through any of the remaining Doors, but only under Door 3, Door 4, or Door 5, must be provided an active plan of care that includes restorative nursing care and a discharge plan (except for those receiving end-of-life care).” (p. 3)

The Michigan Medicaid Nursing Facility LOCD Field Definition Guidelines uses the same language for all three Doors. For example, guidance for Door 3 states:

“Applicants who score in only Door 3 are those who most likely require ongoing assessment and follow-up monitoring. Care planning for these applicants must include restorative nursing interventions and a specific discharge plan.” (p. 11)

These guidelines make it clear that Doors 3, 4 and 5 represent limited eligibility stays and require on-going monitoring and assessment. The current process requiring the 90 day limit serves a valid purpose in that the provider must determine which of the following conditions exist:

- The participant continues to meet the LOCD criteria for Doors 3, 4 or 5 based upon current conditions,
- The participant’s condition has changed and meets the criteria for a different Door, or
- The participant does not meet the LOCD criteria for any of the Doors, an Adverse Action Notice must be issued and a discharge plan initiated.

A key change in the LOCD process is that the Doors are given a hard end-date in CHAMPS. MI Choice participants who initially pass the LOCD through Doors 3, 4 and 5 must be reassessed using the LOCD tool every 90 days. Please note that the 90 day LOCD reassessment is not required to be conducted face-to-face. If a participant has a significant change in condition, the LOCD is required to be conducted in-person and entered online. The waiver agency is responsible for determining if a 90 day LOCD reassessment based upon medical records or a telephone interview is adequate, or if a face-to-face reassessment is necessary.

Sincerely,

A handwritten signature in cursive script that reads "Chris Priest".

Chris Priest, Director
Medical Services Administration