(FY2016 Appropriation Act - Public Act 84 of 2015)

March 1, 2016

Sec. 1004. (1) The department shall continue to work with the workgroup created to make recommendations to achieve more uniformity in capitation payments made to the PIHPs. (2) The department shall provide the workgroup's progress report to the senate and house appropriations subcommittees on the department budget, the senate and house fiscal agencies, and the state budget director by March 1 of the current fiscal year.



In November 2013, the Behavioral Health and Developmental Disabilities Administration (BHDDA) leadership staff convened a workgroup to evaluate historical rate setting methodology. BHDDA invited the Executive Directors of the ten Prepaid Inpatient Health Plans (PIHPs), their selected representatives, an individual representing the Michigan Association of Community Mental Health Boards, and Michigan Department of Health and Human Services (MDHHS) actuary firm, Milliman, Inc. to participate on the workgroup.

In accordance with the appropriation requirements originally established in P.A. 59 of 2013, the workgroup's purpose was to review the existing rate methodology used to determine the PIHP Medicaid rates, and to develop a more consistent statewide strategy, both short and long term, to reduce the disparities across populations. The goal was to create a rate model that has greater emphasis on morbidity versus heavy reliance on historical spending, while ensuring sufficient and equitable funding to meet medically necessary services.

Workgroup members agreed and were supportive of a long term strategy to analyze the current rate setting methodology and data elements and evaluate new variables for use in the rate setting processes. Subsequent discussions included:

- 1. Evaluation of the current model, including the impact of Internal Savings Funds, Medicaid Savings, and MDHHS policy.
- 2. Evaluation of the current data elements and factors used in the rate setting methodology, as well as proposal and evaluation of additional elements and factors to determine their utility and value for use in future rate setting processes.

With the assistance of the workgroup and Milliman, data elements currently used in the rate setting methodology were analyzed and evaluated. Workgroup discussions and analysis also identified areas where PIHP inconsistencies in the submission of data elements to BHDDA existed. Additional elements and factors that have been evaluated for inclusion in the statewide rate setting methodology include:

- Cost of labor
- Cost of living
- Age/gender
- Eligibility group
- Geographic dispersion (transportation)/economy of scale
- Residential living
- Diagnosis (including risk adjustment)
- Employment
- Health measures/hospitalization data
- Socio Economic Status
- Demographic information
- Social Security Data on nature of disability
- All standardized assessment tool data for each population
- Prevalence
- Chronic health conditions

The workgroup also reviewed rate calculation methodologies used by some PIHPs in order to identify any factors and processes that should be considered for use in the MDHHS' rate calculation methodology.

3. Evaluation of how the implementation of statewide uniform assessment tools for specific populations might be used to strengthen and improve the uniformity of the rate setting process.

- Persons with Intellectual and Developmental Disabilities The completion of the Supports Intensity Scale (SIS) was included as a PIHP contractual requirement in FY14. As progress towards full implementation is achieved, further analysis of the value of data elements in the rate setting process will be evaluated and adopted. Children with Severe Emotional Disturbance (Child and Adolescent Functional Assessment Scale currently used)
- Adults with Severe and Persistent Mental Illness The completion of the Level of Care Utilization System (LOCUS) will be included as a PIHP contractual requirement in FY 17. As progress towards full implementation is achieved, further analysis of the value of data elements from the assessment in the rate setting process will be evaluated and adopted.

Summary:

The MDHHS, Behavioral Health and Developmental Disabilities Administration used the expertise and experience of this workgroup to recommend a timeframe for implementing new rate setting factors and methodologies, including any new variables or factors and changes in the weighting of those factors and historical costs.

MDHHS, Milliman, and representatives from each of the ten PIHPs recommended modifications to the geographic factor methodology to place a greater emphasis on underlying population morbidity in the development of the factors.

As a result MDHHS is moving toward an updated geographic factor methodology that does not incorporate the unit cost differences between PIHPs or utilization differences between similar cohorts of individuals. This transition began October 1, 2015 and is occurring over four sixmonth intervals, from October 1, 2015 to September 30, 2017. The updated geographic factor methodology is established based on morbidity and treatment prevalence (the percentage of the population receiving services on a monthly basis) differences between PIHPs. This transition is intended to be budget neutral from a statewide expenditure basis.

To limit the potential disruption of beneficiary services, MDHHS is transitioning the PIHP geographic factors from the prior methodology to the new methodology over a 24 month time period (noted below). The following provides a timeline for the transition to exclusively using morbidity and treatment prevalence differences in the geographic factor methodology. The transitional period combines two geographic factor methodologies with different weights as time progresses; using the state fiscal year 2015 calculated geographic factors based on an equal weight of historical cost and morbidity (existing Factors) and using the new geographic factor methodology which only includes morbidity and treatment prevalence differences (New Method).

- October 1, 2015 March 31, 2016 100% Existing Factors
- April 1, 2016 September 30, 2016 67% Existing Factors, 33% New Method
- October 1,2016 March 31, 2017 33% Existing Factors, 67% New Method
- April 1, 2017 September 30, 2017 100% New Method

As the MDHHS implements the new models of practice and payment, the workgroup membership remains committed to the process of analysis and evaluation of the new rate setting methodology, as well as the introduction of new statewide variables/factors and assessment tools.