

**Bureau of Managed Care
Managed Care Organizations
Policy / Procedures**

Community Transitions Initiative (CTI)

The purpose of this policy is to provide guidance to Managed Care Organizations (MCOs) regarding the Community Transitions Initiative (CTI), established pursuant to Sections 5.18.6 and Sections 7.23 of the HealthChoice Illinois (HCI) contract and Section 2.5.4.7 of the Medicare-Medicaid Alignment Initiative (MMAI) contract. The CTI went into operation for HCI on October 1, 2020 and is targeted for implementation under the MMAI on March 1, 2022.

General Overview

Through the CTI, MCOs may receive incentive payments for the successful transition of members living in Nursing Facilities and Specialized Mental Health Rehabilitation Facilities (SMHRFs) into the community, with a particular emphasis on community transitions for Williams and Colbert Class Members. Under this initiative, MCOs are required to work in collaboration with the University of Illinois at Chicago College of Nursing (UIC-CON) and the Department of Human Services (DHS) Comprehensive Class Member Transition Program (DHS Comprehensive Program). CTI training and forms can be found on the UIC-CON website at: <https://colbert-williams.nursing.uic.edu/community-transitions-initiative/>.

Additional requirements and procedures for the community transition process may be required for members who are designated as a Williams or Colbert Class Member; such requirements are noted as appropriate through this policy. MCOs must adhere to and implement all relevant aspects of the Williams and Colbert consent decrees, Williams and Colbert implementation plans, and any subsequent revisions, updates, or related court orders, which are available here:

<https://www.dhs.state.il.us/page.aspx?item=98210>. Where requirements of the Williams and Colbert consent decrees or implementation plans overlap or conflict with the requirements of this policy, the consent decrees or implementation plans will be prioritized.

1. CTI Policies

1.1. Members Eligible for Participation. To be considered eligible for an incentive payment under the CTI, the member must meet the following criteria:

- 1.1.1. Have continuously resided in a Nursing Facility or a SMHRF for a minimum of ninety (90) days; and,
- 1.1.2. Have a documented and expressed interest in transitioning to a community living arrangement.

MCOs may not seek Prior Approval from the UIC-CON for transition plans or comprehensive community transition evaluations documenting impairments that preclude transition for members that did not expressly indicate a desire to transition to a community-based setting. MCOs must ensure their documentation reflects the express wishes of the member regarding the pursuit of a community living arrangement. Failure to provide such verification will result in a denial of the transition plan or evaluation by the UIC-CON.

1.2. **Incentive Payments for Successful Community Transition.** MCOs may receive incentive payments for eligible members who have successfully transitioned to the community following a Transition Service Plan approved by UIC-CON. MCOs will receive incentive payments for all eligible transitions once the annual performance target minimum established by the Department has been met. For a transition to be considered for an incentive payment, the member must have:

1.2.1. Transitioned to permanent supportive housing or other appropriate housing arrangement;

1.2.2. Maintained uninterrupted community tenure throughout the period cover by the incentive payment. Uninterrupted Community Tenure is defined as follows:

1.2.2.1. The member must not have been admitted to an inpatient or institutional setting for a stay of greater than 30 days per admission.

1.2.2.2. The member must not have spent more than 60 days (across all stays) in an inpatient setting within a six-month timeframe.

1.2.2.3. If the member is away from their community placement on the six-month anniversary of transition, then they will not be eligible until they return to community, and then only if both items i and ii were met; and,

1.2.2.4. Maintained enrollment with the same MCO. The MCO that initiated the community transition will receive the incentive payment for eligible transitions so long as the member has not had more than a three-calendar month break in enrollment with the MCO during the period under review. Members who shift from coverage under the HCI program to coverage under the MMAI program with the same MCO will be eligible for an incentive payment so long as all other requirements are met. In no instance will an MCO that did not initiate the transition to the community be eligible to receive an incentive payment for that member.

1.3. **Incentive Payments for Evaluations.** MCOs may also receive incentive payments for assessments approved by UIC-CON that document impairments that preclude the member from transitioning to the community. MCOs will receive incentive payments for all evaluations documenting impairments precluding transition once the annual performance target minimum established by the Department has been met.

2. **Appropriate Housing for Transition.** Appropriate housing must comply with the provisions of the Williams v. Pritzker and Colbert v. Pritzker consent decrees for community-based settings, which is generally defined as the most integrated community-based setting appropriate to promote a member's independence in daily living, economic self-sufficiency, and ability to interact with persons without disabilities to the fullest extent possible. A community-based setting may include Permanent Supportive Housing (PSH), a Private Residence, a Supportive Living Program, or other appropriate supported or supervised residential settings that are specifically chosen by member. PSH means integrated permanent housing, with tenancy rights,

linked with flexible community-based services that are available to members when they need them, but are not mandated as a condition of tenancy. This includes scattered-site housing (section 811, subsidized units, etc.), apartments clustered in a single building, supported/supervised residential, supportive living settings. The consent decrees place additional requirements on, and may restrict, transitions to PSH if a building has more than 25 units known to be occupied by persons with mental illness or disabilities. While permanent supportive housing is the preferred setting for transition, other community or independent living arrangements, such as residing with a family member, will be considered eligible transition settings under CTI.

2.1. For Williams and Colbert Class Members: In most circumstances, PSH or Private Residence will be required for compliance with the Williams and Colbert Consent Decrees. However, there may be circumstances where PSH or Private Residence may not be specifically chosen as the preferred housing arrangement by the Class Member, or may not be clinically appropriate. If there is a determination, as part of the Transition Service Plan processes, that a Class Member will not be transitioning to PSH or Private Residence, the Transition Service Plan shall:

- 2.1.1. Specify the reasons for this determination;
- 2.1.2. Specify what services the Class Member needs that could not be provided in a PSH or Private Residence; and,
- 2.1.3. Describe the community-based services the Class Member needs to live in another community-based setting that is the most integrated setting appropriate.

Reasonable measures must be taken to ensure a Class Member's housing remains available in the event the Class Member is temporarily admitted to a hospital or other treatment facility.

2.2. Bridge Subsidies for Colbert and Williams Class Members. Bridge subsidy vouchers can be accessed by Colbert and Williams Class Members through the DHS Comprehensive Program. Bridge subsidies can be utilized by Class Members to assist with housing supports temporarily until a permanent housing voucher becomes available. Bridge Subsidy policy, forms, and training for MCOs can be found at <https://colbert-williams.nuring.uic.edu/community-transitions-initiative>.

2.3. Transition Assistance Funds (TAF) for Colbert and Williams Class Members. MCOs may access TAF through the Department to assist Colbert and Williams Class Members who are in the process of transitioning or have transitioned within the previous six (6) months from a Nursing Facility or SMHRF to a community-based setting. TAF may be used to assist Class Members with the supports and essentials required to establish and maintain community housing.

- 2.3.1. Each Colbert Class Member has access to up to \$4,000 in TAF. Each Williams Class Member has access to up to \$2,800 in TAF.
- 2.3.2. Housing must be identified by the Class Member before TAF can be utilized.

2.3.3. The assessment process should include an evaluation of the Class Member's need for TAF to support community transition. If the assessment indicates a need for supports using TAF, details on the type and amount of supports within each of the allowable categories outlined below should be included in the Class Member's Transition Service Plan and should be reasonable to meet the identified needs of the Class Member.

2.3.4. TAF can be used to purchase the following items:

2.3.4.1. Apartment application fees;

2.3.4.2. Security deposits or move-in fees;

2.3.4.3. Utility connections or deposits;

2.3.4.4. Furniture;

2.3.4.5. Linens and bedding;

2.3.4.6. Dishes and other household essentials;

2.3.4.7. Medical and testing supplies not covered by the MCO;

2.3.4.8. Medical equipment not covered by the MCO;

2.3.4.9. Past unpaid utilities bills;

2.3.4.10. Class Member's rent portions of housing option per Transition Service Plan;

2.3.4.11. Food not to exceed \$300;

2.3.4.12. Transportation expenses not covered by the MCO that are related to the securing or maintaining community-based housing, such as: exploring housing options, meeting the landlord, meeting with rental agency or landlord to sign forms, acquiring needed information (i.e. ID Card, birth certificate, Social Security documents) to complete housing applications.

2.3.5. TAF are to be administered by the MCO. Under no circumstances can MCOs give cash or cash-equivalent items (such as gift cards or money orders) to Class Members using TAF.

3. **CTI Process for Outreach, Assessment, Transition Service Plan, Transitions.** This section outlines the process MCOs must follow in conducting outreach, assessment, transition service planning, and transitions for members under the CTI. MCOs must adhere to this process to qualify for incentive payments under the CTI and must adhere to this process for all Williams and Colbert Class Members.

3.1. MCO identifies member residing in a Nursing Facility or SMHRF who may be interested in transitioning to the community.

For Williams or Colbert Class Members: The MCO must complete form 1.1 Consent Decree Class Member Outreach Inquiry and submit to UIC-CON within two (2) business days after the member is identified by the MCO. UIC-CON will determine if the member is actively working with the DHS Comprehensive Program and will provide a response to the MCO within two (2) business days after receiving form 1.1. If the member is not determined to be actively working with the DHS Comprehensive Program, UIC-CON will notify the MCO to proceed with outreach to the member. MCOs must receive approval from UIC-CON prior to outreaching a Williams or Colbert Class Member.

3.2. MCO conducts outreach to the member to determine interest in transitioning to the community.

For Williams or Colbert Class Members: Upon approval by UIC-CON for outreach, MCOs must conduct outreach to Colbert and Williams Class Members within 10 calendar days and complete form 1.2 Person Outcome and submit to UIC-CON within two (2) business days following outreach activity.

3.3. MCOs must complete a thorough and rigorous assessment of members interested in transition to the community within fourteen (14) calendar days following successful outreach to determine whether the member should be recommended for transition to the community. The outcome of assessment must be documented on form 1.2 Person Outcome and submitted to UIC-CON within two (2) business days of completion for all members.

3.3.1. **Members Not Recommended for Transition.** If the member is not recommended for transition, the MCO must document the reasons why on form 1.2 Person Outcome and provide the necessary clinical documentation to UIC-CON for review. This must include a copy of the member's completed assessment, a list of medications and diagnoses, and clinical documentation from the Nursing Facility or SMHRF.

3.3.1.1. UIC-CON will complete a review of the clinical documentation within ten (10) business days. If UIC-CON disagrees with the MCO's not recommended for transition outcome, written rationale with recommendations will be provided to the MCO. The MCO must revise and address UIC-CON's recommendations or provide further rationale of why the member is not being recommended for transition. This revision must be completed timely in order to not unduly delay the member's potential transition to the community.

3.4. If the member is recommended for transition, the MCO must promptly work with the member to develop a person-centered Transition Service Plan. The Transition Service Plan must be completed within 90 calendar days following completion of the assessment. Form 3.1 Transition Service Plan must be submitted to UIC-CON within two (2) business days following completion. The Transition Service Plan must be forwarded to UIC-CON at least 10 calendar days prior to the transition proposed date to allow UIC-CON time to review and provide recommendations.

3.4.1. **Transition Service Plan Requirements.** Transition Service Plans must: 1) reflect the current status and service needs of the member; 2) reflect the member's housing plan; and 3) provide assurances that the housing plan is appropriate to the member's needs and is of quality standard. Updates must be made to the Transition Service Plan as the member's status or needs change.

3.5. The transition of members shall occur as quickly as possible following approval of the Transition Service Plan by UIC-CON. If the member has not transitioned within thirty (30) calendar days after approval of the Transition Service Plan, the MCO must provide a written update the UIC-CON outlining the reasons for the delay in transition and providing a timeline for transition.

3.6. Once a member transitions to the community, the MCO must complete form 4.1 Transition Notice and submit to UIC-CON within two (2) business days after the member transitions.

For Williams and Colbert Class Members. Transition Service Plans must be updated every 180 calendar days or earlier if there is a change in needs or preferences of the Class Member. Form 3.1 Transition Service Plan must be completed and submitted to UIC-CON within two (2) business days following any update to a Class Member's Transition Service Plan.

3.7. MCOs shall comply with any requests for information or reporting from the UIC-CON on its activities related to CTI.

4. CTI Reimbursement Process

4.1. **Reimbursement of Incentive Payments.**

4.1.1. MCOs may receive incentive payments for which they have qualified consistent with CTI policies once the annual performance target minimum established by the Department for successful transitions and approved evaluations have respectively been met by the MCO.

4.1.2. MCOs shall complete the MCO CTI Reporting Template with information on those members who have met the criteria for an incentive payment and submit it to the Department by the 10th business day of each month.

4.1.3. For incentive payments for successful community transitions, MCOs shall conduct due diligence to determine whether the member has maintained uninterrupted community tenure prior to requesting an incentive payment from the Department. Specifically, the MCO shall conduct a thorough search of its claims data, care management information for the member, LTC or other relevant eligibility and placement data provided by the Department, and any other relevant data at the MCO's disposal to determine whether the member has been admitted to an inpatient or institutional facility for a length of time beyond what is allowable to receive an incentive payment. MCOs shall not request an incentive payment for any member who has not met the criteria outlined in section 1.2 of this policy.

4.1.4. The Department will review the MCO CTI Reporting Template following receipt each month to confirm whether the member qualifies for an incentive payment. The Department will provide a response file back to the MCO following the completion of its review to inform the MCO of its findings.

4.1.5. The Department will issue reimbursement for any members determined to meet the incentive payment criteria each month.

4.1.6. If the MCO becomes aware of any new information that would disqualify a member from receiving an incentive payment after the Department has issued reimbursement, the MCO must immediately notify the Department of its findings and work with the Department to determine the best mechanism for returning the inappropriately paid incentive.

4.1.7. The Department will continue to monitor claims and LTC data for all members the MCO was issued an incentive payment for a period of two (2) years following the end of the

time period covered by the incentive payment. If the Department becomes aware of any information that would disqualify a member from receiving an incentive payment after the Department has issued reimbursement, the Department will immediately notify the MCO of its findings and work with the MCO to determine the best mechanism for recoup the incentive payment.

4.2. Reimbursement of Transition Assistance Funds.

4.2.1. TAF expenses do not require prior approval from the Department. MCOs may seek technical assistance or guidance from the Department on if it is unclear whether a particular item or support is allowable under the TAF.

4.2.2. MCOs must track each item purchased for Class Members using TAF.

4.2.3. MCOs shall submit an invoice to the Department with proof of incurred TAF expenses for Class Members once per month for reimbursement.

4.2.4. The Department will issue reimbursement to the MCO for incurred TAF expenses following review and confirmation of the information submitted with the invoice.

4.2.5. Unallowed expenses, expenses over the Class Member’s allowable dollar value, or expenses without documentation will not be reimbursed to the MCO.

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Action
Contract Clarification

Policy Originator
Kati Hinshaw

Policy Revisions
[revision date]

Revision Approved
[name of person who approved revision]

