

COMMUNITY HEALTHCHOICES (CHC)

OPERATIONS MEMORANDUM #2019-04

SUBJECT: **REVISED**-NURSING HOME TRANSITION (NHT) AND NEW NURSING FACILITY (NF) TO HOME AND COMMUNITY-BASED SERVICES (HCBS) TRANSITION PROCEDURES

TO: CHC-Managed Care Organizations (MCO)

FROM: Bureau of Policy Development and Communications Management

DATE: ~~October 29, 2019~~ December 29, 2023

PURPOSE

NHT has been a priority in the state's efforts to rebalance its long-term services and supports (LTSS) system. Historically, the NHT program in Pennsylvania has focused on providing support for CHC NF Participants to overcome barriers to the normal discharge process and return to living in the community.

CHC-MCOs are required to provide CHC NF Participants, who request transition out of a NF, with the necessary support and services to facilitate a safe discharge to home, in accordance with Section V.L. of the CHC Agreement. To support this transition, the CHC-MCO Service Coordinator (SC) and the Participant will identify the Participant's goals for transition from the NF and how any barriers will be addressed in the person-centered service plan (PCSP).

Medical Assistance (MA) eligibility status in the community and eligibility for HCBS in the CHC waiver may differ for each person and requires the CHC-MCO SC to identify the transition process that will result in a safe discharge. The procedures outlined below allow for determination of a qualifying NF resident's HCBS eligibility prior to discharge from the NF.

Money Follows the Person (MFP) enrollees must have resided in a long-term care (LTC) NF for at least 60 days with at least one (1) day funded by Medicaid, must

be enrolling in an HCBS waiver, such as the CHC Waiver, or the Living Independence for the Elderly (LIFE) program, upon discharge, and must be moving to a qualifying residence in the community. An MFP-qualifying residence is one of the following:

- A home owned or leased by the individual or individual's family member;
- An apartment with an individual lease, with lockable access and egress, which includes living, sleeping, bathing, and cooking areas over which the individual or the individual's family has domain or control; or
- A residence, in a community-based residential setting, in which no more than four (4) unrelated individuals reside.

PROCEDURES

For NF residents who are eligible for MA ~~Long Term Care (LTC)~~, the Office of Income Maintenance has implemented a new procedure, effective February 19, 2019, to enable the County Assistance Office (CAO) to determine eligibility for HCBS prior to NF discharge. The new NHT transition procedures impact CHC Participants in a NF who are eligible for MA LTC and new to HCBS. They do not apply to beneficiaries who were eligible for HCBS immediately prior to entering the NF or who are not eligible for MA LTC.

NHT Request

When a NF Participant with open MA LTC requests transition out of a NF and into the community, the CHC-MCO will email the Participant's completed Referral Form, located at <https://paieb.com>, to the Independent Enrollment Broker (IEB) at ***Redacted due to internal information***. The CHC-MCO must not use the Nursing Facility Referral Form. The subject line of the email will be: NF-HCBS [Participant Last Name] MCI [MCI Number] Discharge [Anticipated Date of Discharge MM/DD/YY], if known at the time of referral, e.g. NF-HCBS Smith MCI 123456789 Discharge 2/28/19.

The IEB will notify the referring CHC-MCO via email when the applicant's functional eligibility determination is complete. The CHC-MCO must designate a Resource Account (RA account) for this purpose. If the applicant has been determined Nursing Facility Clinically Eligible (NFCE), the IEB notification will include a reminder to notify the IEB two weeks in advance of the discharge date. The CHC-MCO must submit the notice of discharge to the IEB two weeks prior to the discharge date. If notice is less than two weeks from the anticipated discharge date, the CAO may not be able to determine eligibility prior to discharge. If the notice is submitted earlier than two weeks prior to discharge date, the IEB will request the CHC-MCO SC/NHT Coordinator submit again at two weeks prior to the discharge date. This notification should be sent to the IEB at ***Redacted due to internal information*** with the subject: NF-HCBS [Participant

Last Name] MCI [MCI Number] Discharge [Anticipated Date of Discharge MM/DD/YY]. This email must include the NF admission date, length of stay, and the location type of the setting to which the applicant will be discharged. The coding of the location type is as follows:

- 1 – Own Residence
- 2 – Family Member Residence
- 3 – Group (Residential Habilitation)

Upon receipt of the confirmed discharge date, the IEB completes the Home and Community Based Services (HCBS) Eligibility/Ineligibility/Change Form (PA 1768) and submits it to the CAO with the anticipated discharge date and a comment that an NHT discharge is occurring. For applicants who meet the eligibility criteria for MFP, the IEB will also select the MFP code based on the identified discharge location type.

The CAO will determine financial eligibility and, if the Participant is found financially eligible for HCBS, open the HCBS waiver code, transferring the individual into the CHC waiver population group. The NF code will remain open until the CAO receives the Long Term Care Discharge and Transmittal Form (MA 103) from the NF confirming discharge. The CHC-MCO will be notified of eligibility on the daily 834 file and should begin service plan development for HCBS to begin upon discharge.

The CHC-MCO SC must follow-up with the NF to make sure the MA 103 has been submitted to the CAO for the facility code to be end-dated and the transfer to be finalized HCBS to begin. The CAO will reference the PA 1768 and add MFP information to the record at the time the facility code is end-dated based on the MA 103.

The IEB will send the final enrollment mailing packet to the CHC-MCO via the RA account designated by the CHC-MCO within one business day.

If the Participant applicant is found financially ineligible for HCBS, the IEB will confirm via email to the RA account designated by the CHC-MCO that the CHC-MCO received notice of the Participant's financial ineligibility for HCBS.

Discharge

When the individual discharges, the NF will send the MA 103 to the CAO. The CHC-MCO must follow-up with the NF to make sure the MA 103 has been submitted to the CAO for HCBS to resume. HCBS services can begin once the waiver code 20 is added to the record.

Timely Discharge

If the NF discharge occurs on the same date that was originally anticipated and communicated to the CAO, the NF will send the MA 103 to the CAO with the discharge date. The CAO will close the NF code in the eligibility system **effective as of the discharge date identified on the MA 103 and open the HCBS budget**. The CAO will issue a PA 162 Notice of Determination for HCBS eligibility. The CHC-MCO will be notified of HCBS eligibility on the daily 834 file.

Discharge Less Than 30 Days After Anticipated Date

If the NF discharge occurs less than 30 days after the anticipated date, the NF will send the MA 103 to the CAO within two business days of the Participant's discharge with the new discharge date indicated on the MA 103. The CAO will correct the HCBS begin date in the eligibility system to reflect the discharge date identified on the MA 103. The CAO will issue a new PA 162 Notice of Determination with the corrected waiver begin date. The IEB can close the case after this has been completed.

Discharge More Than 30 Days After Anticipated Date

If the NF discharge will occur more than 30 days after the originally anticipated discharge date, **the CHC-MCO will submit the notice of discharge to the IEB at *Redacted due to internal information* two weeks prior to the discharge date**. The IEB will issue a new PA 1768 with the new anticipated discharge date. **For applicants who meet the eligibility criteria for MFP, the IEB will also select the MFP code based on the identified discharge location type.** ~~and~~ The CAO will update the HCBS begin date in the eligibility system to reflect the new anticipated discharge date. Eligibility will not change until discharge or another change in circumstances.

No Discharge

If the Participant's circumstances result in the Participant not being discharged, **the IEB will send a new PA 1768 to the CAO indicating that the individual will not be discharging and is no longer applying for HCBS**. The CAO will close the HCBS waiver code back to the date the waiver code was opened and send a PA 162 Notice of Determination. The IEB will notify the CHC-MCO SC/NHT coordinator via email to the RA account designated by the MCO that the PA 1768 has been issued to close the waiver code as discharge did not occur within 30 days of the last identified discharge date. When the Participant is again ready to discharge, the CHC-MCO will notify the IEB with an email to ***Redacted due to internal information*** two weeks in advance of the new anticipated discharge date. If notice is less than two weeks from the anticipated discharge date the CAO may not be able to determine eligibility prior to discharge.

NEXT STEPS

1. Review this information with appropriate staff.
2. Contact the Bureau of Coordinated and Integrated Services if you have questions.