



# OFFICE OF LONG-TERM LIVING BULLETIN

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**SUBJECT:**

Nursing Home Transition Program Changes

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**PURPOSE:**

The intent of this bulletin is to notify providers of Nursing Home Transition (NHT) Services of the expansion of the NHT program, restructuring of the payment methodology for NHT activities, and procedures on how to provide and report allowable NHT activities. The Office of Long-Term Living (OLTL) is changing the reimbursement structure for pre-transition activities from an administrative function to a service under the Aging, Attendant Care, COMMCARE, Independence and OBRA waivers.

**SCOPE:**

This bulletin applies to all OLTL providers of NHT services.

**BACKGROUND:**

The NHT program was developed to assist individuals who want to move from a nursing facility back to a home and community-based setting of their choice and to help the Commonwealth rebalance its long-term living systems so that individuals have a choice of where they live and receive services. The NHT program provides the opportunity for individuals and their families or caregivers to be informed of all long-term living options, including the full range of Home and Community-Based Services (HCBS), and provides guidance and support needed to make an informed choice about their long-term living services. The NHT program assists individuals in moving out of institutions and eliminates barriers in service systems so that individuals receive services and supports in settings of their choice.

Currently, OLTL only allows designated NHT Coordination Agencies (NHTCA) to bill for pre-transition activities necessary to transition an individual from an institutional setting to a home and community-based setting. These activities are currently billed as an administrative activity. The NHT Coordination Agency (NHTCA) uses the NHT 01 code to bill for pre-transition services. OLTL, in conjunction with stakeholder recommendations, has identified opportunities to enhance and to streamline the current process, which includes the following: enhancing participant choice by increasing the number of collaborative partners; improving and streamlining the current reimbursement structure for pre-transition activities; and increasing and clarifying the activities allowable for reimbursement.

## **DISCUSSION:**

Recently, OLTL committed to evaluating the current NHT program to determine if changes could be made to enhance the effectiveness of the program and improve outcomes. As a result of the stakeholder recommendations, OLTL is expanding the availability of transition service coordination by making the activities associated with transitioning an individual from an institutional setting to a home and community-based setting a **waiver service** available in the Aging, Attendant Care, COMMCARE, Independence, and OBRA waivers.

In accordance with CMS guidance, participants being enrolled into a waiver may receive transition service coordination services while they are still institutionalized. However, payment may only occur on the date the individual is enrolled in the waiver. In such cases, the pre-transition activities conducted while the person was institutionalized are not considered complete until the person leaves the institution and is enrolled in the waiver. Therefore, OLTL has included transition service coordination in the OLTL waivers as part of the service definitions for Service Coordination located in Appendix C: 2 of the waivers. *“Service Coordination includes functions necessary to facilitate community transition for participants who received Medicaid-funded institutional services (i.e. nursing facilities) and who lived in an institution for at least 90 consecutive days prior to their transition to the waiver. Service Coordination activities for participants leaving institutions must be coordinated with, and must not duplicate, institutional discharge planning. This service may be provided up to 180 days in advance of anticipated movement to the community.”*

Therefore, NHTCAs that are also enrolled as OLTL Service Coordination Entities (SCE) will bill service coordination directly through the waiver by using the waiver procedure code for Transition Service Coordination (W7337). This change will allow NHTCAs to bill for pre-transition activities through the Individual Service Plan (ISP) at the regional Transition Service Coordination rate.

Effective December 1, 2016, if an individual has resided in a nursing facility for at least 90 consecutive days, is transitioning from the nursing facility to a home and community-based waiver setting, is not scheduled to leave the facility via normal discharge procedures, and is approved for and enrolling into an OLTL waiver program, the NHT Coordinator (NHTC) must document all transition coordination activities on the participant’s ISP and bill through the waiver using the W7337 procedure code. NHTCAs that are not SCEs may conduct transition activities for OLTL waiver participants, however payment for transition activities will be through NHT 01 versus W7337.

**Billing for all transitions of participants that began prior to December 1, 2016 will be handled using billing procedures in use prior to December 1, 2016 to include associated outcome payments.**

Individuals **who are not waiver eligible** must meet the **NHT participant definition** and will continue to be transitioned through the NHT program in accordance with the new procedures outlined in this bulletin and in the NHT Program Guidebook at <http://www.dhs.pa.gov/provider/nhtprgramfrviders/index.htm>

Beginning December 1, 2016, OLTL is restructuring the payment methodology for NHT activities for the NHT program. Currently, the NHTCAs are reimbursed for NHT activities as stated in the September 26, 2008, NHT Program Funding memo and Aging Program Directive (APD) # 10-01-01. The new methodology will change the payment structure for the NHT provider to allow for:

- Pre-transition activities for waiver eligible individuals are to be billed using the W7337 procedure code and will be paid at the corresponding regional rate.
- NHT 02 payment to be discontinued. It is replaced by two separate outcome payments defined below in Section A.3.(a.) of this bulletin.
- Outcome payments for NHT 03 through NHT 05 to be discontinued for participants receiving service coordination through an OLTL program (waiver or Act 150 program).

## **PROCEDURES:**

### **A. Procedure for NHT participants under OLTL waiver programs (Aging, Attendant Care, COMMCARE, Independence, and OBRA waivers).**

#### **1. Provider Enrollment**

In order to provide the transition service coordination activities as defined in the OLTL waivers, current SCEs that are NHTCAs must submit the required information to the Bureau of Quality and Provider Management Enrollment and Certification Section at [ra-hcbsevenprov@pa.gov](mailto:ra-hcbsevenprov@pa.gov) by **November 1, 2016** in order to have transition service coordination added to their provider profile. Current NHTCAs that do not currently meet the requirement of being an enrolled SCE may reach out to the Bureau of Quality and Provider Management Enrollment and Certification Section to begin the steps necessary to become an enrolled SCE. Current NHTCAs that do not meet the requirement of being an enrolled SCE may continue to complete and bill for transitions in accordance with the procedures outlined in Section B.2. below of this bulletin and in the NHT Program Guidebook.

Effective December 1, 2016, SCEs that are interested in becoming a NHTCA must contact the Bureau of Quality and Provider Management Enrollment and Certification Section at [ra-hcbsevenprov@pa.gov](mailto:ra-hcbsevenprov@pa.gov) to begin the steps necessary to enroll to provide these services. This step must be completed prior to providing and billing for NHT services.

All NHT providers are responsible to follow the procedures outlined in the NHT Program Guidebook.

**Note: SCEs are strongly encouraged to enroll to provide services in all OLTL waivers. If an SCE does not enroll as a provider for all OLTL waivers, they are assuming the risk of non-payment for Transition Service Coordination provided to an individual who enrolls in a waiver for which the SCE is not enrolled as a provider. In this case neither W7337 nor NHT 01 may be billed.**

## 2. Service Procedures

**Allowable pre-transition activities should be documented in quarter hour (15 minute) units and include, but are not limited to, the following:**

- Acting as a liaison between the facility where the participant will be transitioning from and the Independent Enrollment Broker (IEB) for waiver services.
- Assessing for the appropriateness of a transition from an institution to the community. This includes gathering information about the need for health services, social supports, housing, transportation, financial resources and other needs.
- Assisting the individual, family, nursing facility staff and others in the development of an integrated, coordinated person-centered transition plan, including services provided through the nursing facility, add-on services, medical services (including Medicaid), behavioral health services, primary care, and other services to meet needs, ensure a safe discharge, and avoid hospital admissions or re-institutionalization.
- Providing information to the individual about community resources and assisting the individual, family, nursing facility staff and others to ensure timely and coordinated access to Medicaid services, behavioral health services, financial counseling and other services to meet the needs of the individual.
- Assisting in finding and securing housing, including the completion of housing applications and securing required documentation (e.g., social security card, birth certificate, and prior rental history), working with private landlords, housing authorities, Regional Housing Coordinators (RHCs) or other housing entities.
- Assessing the need for any home modifications that may need to be completed prior to the individual transitioning to the community; this includes acting as a liaison between the contractor, and physical and occupational therapists.
- Assisting or coordinating training on budget management and educating the individual on available employment programs.
- Coordinating the individual's move to the community and educating the individual on how to retain housing and on tenant rights and responsibilities.
- Coordinating with Community Transition Services (CTS) available in the waiver by assisting in obtaining household supplies, moving expenses, security deposits, rental fee/deposits and health as safety costs.
- Developing and recording the activities for transition and the coordination of services to allow the participant to live independently in the community.
- Monitoring transition activities.
- Coordinating the date of discharge, including notifying the IEB of the date of discharge.

## 3. Documentation and Billing for NHT Participants in Waiver

**Transition Service Coordination must be authorized in the waiver participant's ISP. One unit of service equals 15 minutes and billable units are limited to 240 units per participant unless justification for an exception has been received and units pre-approved. An exception can be requested by emailing [ra-nht@pa.gov](mailto:ra-nht@pa.gov)**

**and must be documented in the SAMS Journal Notes. Exceptions will be hard capped at 480 units. If a participant has complex needs necessitating additional units above the hard cap to successfully transition, justification must be provided and units pre-approved. If an individual is transitioning from a nursing facility to their home and is approved for and enrolling into an OLTL waiver program, the NHT provider must bill through the waiver using the following procedures.**

- NHT Coordinators (NHTC) who are facilitating a transition and coordinating services and supports are required to maintain and submit documentation of their coordination activities. Document all transition coordination activities in the Social Assistance Management Software (SAMS) Service Deliveries using the Daily Unit Details calendar as they occur.
- Pre-transition activities may begin prior to the effective date a consumer is enrolled in a waiver. However, billing for W7337 cannot occur until the date of discharge.
- On the date of transition, the units captured with the SAMS Service Deliveries for up to 180 days preceding transition and including the day of transition are billed to the waiver ISP under W7337 either in the Home and Community Based Services Information System (HCSIS) ISP or the SAMS ISP. The service deliveries remain in SAMS, and serve as documentation as to when the service was provided, number of units delivered, and duration.
- Transition coordination units that are provided outside of the 180 days prior to the date of transition are to be billed in SAMS Service Delivery as NHT 01 at the assigned regional rate. The 180 day window follows the transition progression. Oldest activities greater than 180 days are paid at the end of each month on a rolling basis.
- Written documentation of the need for service must be documented in the participant's ISP and submitted to the OLTL Bureau of Participant Operations (BPO) waiver enrollment staff for approval.
- BPO enrollment staff will notify the requesting agency of approval, denial, or a request for additional information if necessary.
- NHTCs are required to notify the IEB of the participant's plan to be discharged at minimum two (2) days prior to the discharge. If the discharge does not occur on the date scheduled, the transition service coordinator should notify the IEB of the delayed discharge.
- NHTCs are responsible to check the Eligibility Verification System (EVS) prior to billing W7337 to ensure that the participant has been found financially eligible and the correct waiver code is indicated in the system.

#### **a. Eligible Outcome Payments for NHT Waiver Participants**

- **NHT Outreach Form** - On the date of discharge, the NHT Outreach Form, for the completion of the NHT Outreach Data Collection Form, may be billed in the SAMS Service Delivery for a payment of \$250. The NHT Outreach Form will not pay without a completed NHT Outreach Data Collection Form.
- **NHT Post Transition Gap Coverage** - At 30 cumulative days in the community, the NHT provider may bill \$250 in the SAMS Service Deliveries if a participant requires

supports to assist with continuity of care issues during the transition from the facility to a home and community-based setting, coordination of benefits, and to reduce the risk of re-admission to a facility.

**b. NHT 03-05 outcome payments are not billable for participants receiving service coordination under waiver.**

**B. Procedures for NHT participants who are ineligible for OLTL Waiver Services**

(i.e., LIFE, Options, Family Caregiver Support Program (FCSP), Nursing Facility Ineligible (NFI) and Non-Care Managed or any MA eligible individual who is NOT waiver eligible.)

**1. Service Procedures:**

NHT providers should follow the NHT 01, NHT Outreach Form, NHT Post Transition Gap Coverage, and NHT 03-05 documentation procedures located in the NHT Program Guidebook when transitioning individuals who are not waiver eligible in order to bill for NHT services. Requests for Special Nursing Home Transition Funds (SNHTF) for non-MA eligible individuals should follow the procedures outlined in the NHT Program Guidebook.

**2. Documentation and Billing:**

**a. NHT 01 Pre-Transition Activities**

- Ensure the NHT Outreach Data Collection Form is completed.
- All NHT 01 activities must be documented in the SAMS Service Deliveries using the Daily Unit Details calendar.
- **One unit of service equals 15 minutes and billable units are limited to 240 units per participant unless justification for an exception has been received and units pre-approved. An exception can be requested by emailing [ra-nht@pa.gov](mailto:ra-nht@pa.gov) and must be documented in the SAMS Journal Notes. Exceptions will be hard capped at 480 units. If the participant has complex needs necessitating additional units above the hard cap to successfully transition, justification must be provided and units pre-approved.**
- On the date of transition, the units captured within the SAMS Service Deliveries for up to 180 days preceding transition and including the day of transition are billed as NHT 01 at the assigned regional rate. The service deliveries remain in SAMS, and serve as documentation of when the service was provided, number of units delivered, and duration.
- Transition Coordination units that are provided outside of the 180 days prior to the date of transition are to be billed in SAMS Service Delivery as NHT 01 at the assigned regional rate. The 180 day window follows the transition progression. Oldest activities greater than 180 days are paid at the end of each month on a rolling basis.

**b. NHT Outreach Form** - On the date of discharge, the NHT Outreach Form, for the completion of the NHT Outreach Data Collection Form, may be billed in SAMS Service Delivery for a payment of \$250. The NHT Outreach Form, as well as the

following outcome payments for non-waiver and Act 150 individuals, will not pay without a completed NHT Outreach Data Collection Form.

**Note:** NHTCs may bill NHT Outreach Form for completion of the NHT Outreach Data Collection Form, however NHT Post Transition Gap Coverage and NHT03 through NHT05 activities may not be billed for LIFE participants.

- c. **NHT Post Transition Gap Coverage** - At 30 cumulative days in the community, the NHTC may bill \$250 in the SAMS Service Deliveries if a participant requires supports to assist with continuity of care issues during the transition from the facility to a home and community-based setting, coordination of benefits, and to reduce the risk of re-admission to a facility.
- d. **NHT 03** - At 90 cumulative days in the community, the NHTC may bill the NHT 03 outcome payment for \$250 in the SAMS Service Deliveries after completing the follow-up contact as described in the NHT Program Guidebook.
- e. **NHT 04** - At 180 cumulative days in the community, the NHTC may bill the NHT 04 outcome payment for \$500 in the SAMS Service Deliveries, after completing the follow-up contact as described in the NHT Program Guidebook.
- f. **NHT 05** - At 365 cumulative days in the community, the NHTC may bill the NHT 05 outcome payment for \$750 in the SAMS Service Deliveries after completing the follow-up contact as described in the NHT Program Guidebook.

**NHT 03-05 outcome payments are not billable for participants who receive service coordination in an OLTL program (Act 150).**

### **C. Failed Transitions**

In instances where an individual in the transition process passes away during the transition or any other unforeseen reasons that lead to an unsuccessful transition, the entity handling the transition may bill NHT 01 for time spent on the pre-transition activities necessary to coordinate the transition. In such circumstances, refer back to the NHT 01 billing procedures.

This bulletin rescinds and replaces the September 26, 2008, NHT Program Funding memo and the APD # 10-01-01. In addition, all OLTL policy documents or parts of policy documents that are inconsistent with the content of this bulletin are hereby rescinded.

COMMENTS AND QUESTIONS REGARDING THIS BULLETIN SHOULD BE DIRECTED TO:

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