



# **CalAIM Enhanced Care Management (ECM) and In Lieu of Services (ILOS) Implementation Relaunch**

February 25, 2021

2:00 – 3:00 pm



# Agenda

- **Overview of CalAIM, ECM & ILOS**
- **ECM & ILOS Draft Requirement Documents**
- **ECM & ILOS Implementation Timelines**
- **Implementation Process for Managed Care Plans (MCPs)**
- **Technical Assistance & Implementation Engagement Activities**
- **Public Comment Period Process**
- **Q&A**



# Overview of CaAIM, ECM & ILOS



# CalAIM Overview

## Overview

- CalAIM is a multi-year initiative by DHCS to improve the quality of life and health outcomes of California residents by implementing broad delivery system, program and payment reform across the Medi-Cal program.
- Enhanced Care Management (ECM) and In Lieu of Services (ILOS) are foundational components of CalAIM.

## CalAIM Relaunch Proposal

- DHCS postponed the planned implementation of the CalAIM initiative, originally scheduled for January 1, 2021, so that both DHCS and all of our partners could focus their attention and resources on the public health emergency due to COVID-19.
- On January 8th, 2021, DHCS released a revised CalAIM proposal.



# ECM Overview

## Summary

- ECM will be a whole-person, interdisciplinary approach to comprehensive care management that addresses the clinical and non-clinical needs of high-cost, high-need managed care members through systematic coordination of services.
- Building on the current Health Homes Program (HHP) and Whole Person Care (WPC) Pilots, ECM, with ILOS, will replace both models, scaling up the interventions to form a statewide care management approach.
- ECM will be offered to all high-need Medi-Cal Members who meet ECM target populations criteria. For details, see [Revised CalAIM Proposal, Appendix I](#).
- To ensure that ECM will be community-based, interdisciplinary, high-touch, and person-centered, MCPs will be required, with limited exceptions, to contract with local ECM Providers (e.g., counties, behavioral health Providers, community-based organizations).



# ILOS Overview

## Summary

- In Lieu of Services (ILOS) are medically appropriate and cost-effective alternatives to services covered under the State Plan; they are optional for MCPs to provide and for managed care members to receive.
  - Consistent with federal Medicaid managed care rate setting requirements, the utilization and actual costs of ILOS will be taken into account in developing the component of the MCP rates that represents the covered State Plan services, unless a statute or regulation explicitly requires otherwise.
- The ILOS option within CalAIM builds upon the work done in WPC Pilots; starting in January 2022, DHCS will authorize 14 pre-approved ILOS in its contracts with MCPs.



# ILOS Overview (Continued)

## Summary

- DHCS strongly encourages MCPs to offer the full menu of pre-approved ILOS to comprehensively address the health needs, including social determinants of health, of members with the most complex health challenges.
- MCPs may elect to offer one or more ILOS. MCPs may also propose additional ILOS for DHCS approval. However, MCPs must offer each elected ILOS to all eligible Members within a county, as determined by the MCP based on the ILOS definitions.
- For detailed In Lieu of Services Descriptions, see [Revised CalAIM Proposal, Appendix J](#)



# **ECM & ILOS Draft Documents**





# Overview of ECM & ILOS Draft Documents

- DHCS has released the following set of ECM & ILOS draft requirements documents for public comment:
  1. [DHCS-MCP ECM and ILOS Contract Template](#)
  2. [ECM and ILOS Standard Provider Terms and Conditions](#)
  3. [CaAIM ECM and ILOS Model of Care \(MOC\) Template](#)
  4. [ECM and ILOS Coding Guidance](#)
- These documents are foundational to ECM and ILOS implementation.
- Following the public comment period (February 16 – March 12, 2021), stakeholder feedback will be reviewed and incorporated into the final versions.



# DHCS MCP ECM and ILOS Contract Template

- Standardized statewide requirements regarding implementation and administration of ECM and ILOS will be incorporated within DHCS' MCP contracts.
- The draft Contract Template includes:
  - ECM target populations and ECM core services components
  - DHCS-approved ILOS menu
  - Definitions of “ECM Provider” and “ILOS Provider”
  - Requirement to contract with ECM and ILOS Provider, including exceptions
  - Transitions of WPC and HHP to ECM and ILOS
  - Identification and Authorization of Members for ECM/ILOS
  - Assignment or Referral of Members to an ECM/ILOS Provider
  - Outreach and Engagement into ECM
  - Initiating Delivery and Discontinuation of ECM/ILOS
  - ECM/ILOS Data System Requirements and Data Sharing
  - ECM/ILOS Payment and Quality and Performance Incentive Program



# ECM and ILOS Standard Provider Terms and Conditions

- Standardized contract requirements that MCPs will be required to include in contracts with ECM and ILOS Providers, including:
  - Minimum requirements for entities to operate as ECM and ILOS Providers
  - ECM and ILOS Provider identification of Members for ECM/ILOS
  - Member Assignment/Referral to ECM/ILOS Providers
  - ECM Provider Outreach and Member Engagement
  - ECM/ILOS Provider Training
  - ECM/ILOS Provider Data-Sharing and Reporting
  - ECM/ILOS Claims Submission/Billing and Payment
  - ECM Provider Quality and Oversight



# ECM and ILOS Model of Care Template

## ECM and ILOS Model of Care

- The ECM and ILOS Model of Care (MOC) will be each MCP's unique plan for providing ECM and ILOS to its Members. Each MCP's ECM and ILOS MOC must align with DHCS contract requirements, while also allowing each MCP flexibility to develop a plan that will best meet the needs of their Members and communities.

## ECM and ILOS Model of Care (MOC) Template

- The "ECM and ILOS MOC Template" is the vehicle for the submission of the MOC to DHCS for approval.
- The MOC Template includes the Health Homes Program and Whole Person Care Pilots Transition Plan(s) for MCPs, where applicable.



# ECM and ILOS Draft Coding Guidance

- DHCS requires MCPs to submit encounter data to DHCS in accordance with MCP ECM and ILOS contract requirements and [All Plan Letter 14-019](#), or any subsequent updates.
- MCPs will be required to submit encounter data for ECM and ILOS through their existing encounter data reporting mechanisms for all covered services for which they have incurred any financial liability, whether directly or through subcontracts or other arrangements.
- DHCS has released in draft a defined set of HCPCS codes and modifiers that must be used for ECM and the 14 pre-approved ILOS for public comment. For detailed information on ECM and ILOS Coding Options, please see [ECM and ILOS Coding Options](#).
- MCPs will begin submitting encounters using the new ECM and ILOS coding requirements to the Post Adjudicated Claims and Encounters System (PACES) beginning on January 1, 2022.



# **ECM & ILOS Implementation Timelines**



# ECM & ILOS Implementation Timelines

- **ECM**
  - MCPs will be required to implement ECM starting in January 2022, for Counties with HHP and/or WPC Pilots.
  
- **ILOS**
  - In January 2022, MCPs may begin offering the pre-approved ILOS in all counties.
  - Every 6 months, MCPs may add additional pre-approved ILOS.
  - MCPs may submit a request to DHCS to offer ILOS in addition to those on the pre-approved menu.



# ECM and ILOS Implementation Timeline in Counties with HHP

Date	ECM/ILOS Implementation in Counties with HHP
Jan 1, 2022	<ul style="list-style-type: none"><li>• MCPs launch ECM for all MCP Members who meet Homeless, High Utilizer, and SMI/SED/SUD target population criteria.</li><li>• <b>MCPs must offer ECM to all Members who meet these ECM target population descriptions, not just those Members who are currently served by the HHP.</b></li><li>• MCPs automatically transition Members currently served by or in the process of enrolling in HHP into ECM and reassess within 6 months.</li><li>• MCPs may begin offering ILOS. Additional ILOS may be added in 6 month intervals.</li></ul>
July 1, 2022	<ul style="list-style-type: none"><li>• MCPs expand ECM to include additional ECM target populations, working with other MCPs in each county to align, as applicable.</li></ul>
Jan 1, 2023	<ul style="list-style-type: none"><li>• MCPs expand ECM to all target populations, including the <i>Individuals Transitioning from Incarceration</i> target population.</li></ul>





# ECM and ILOS Implementation Timeline in Counties with WPC Pilots

Date	ECM/ILOS Implementation in Counties with WPC Pilots
Jan 1, 2022	<ul style="list-style-type: none"><li>• MCPs launch ECM for all Members in ECM target populations that align with the populations currently served by the WPC Pilot in each County. <b>MCPs must offer ECM to all Members who meet ECM target population descriptions, not just those Members who are currently served by the WPC Pilot.</b></li><li>• MCPs automatically transition Members currently served by WPC or in the process of enrolling in WPC (as identified by WPC Lead Entities) into ECM and reassess within 6 months.</li><li>• MCPs may begin offering ILOS. Additional ILOS may be added in 6 month intervals.</li></ul>
July 1, 2022	<ul style="list-style-type: none"><li>• MCPs expand ECM for all remaining target populations, except Individuals Transitioning from Incarceration target population (unless the WPC Pilot currently services individuals released from institutions, including jail or prison).</li></ul>
Jan 1, 2023	<ul style="list-style-type: none"><li>• MCPs expand ECM to all target populations, including <i>Individuals Transitioning from Incarceration</i> target population.</li></ul>



# ECM Implementation Timeline in Counties without HHP or WPC Pilots

Date	ECM Implementation in Counties without HHP or WPC Pilots
Jan 1, 2022	<ul style="list-style-type: none"><li>• MCPs may begin offering ILOS. Additional ILOS may be added in 6 month intervals.</li></ul>
July 1, 2022	<ul style="list-style-type: none"><li>• MCPs begin implementation of ECM. <b>MCPs must define a implementation schedule in their ECM and ILOS MOC template by ECM target population.</b> Alignment of implementation among MCPs within each County is strongly encouraged.</li></ul>
Jan 1, 2023	<ul style="list-style-type: none"><li>• MCPs expand ECM to all target populations, including <i>Individuals Transitioning from Incarceration</i> target population.</li></ul>



# Implementation Process for MCPs



# ECM and ILOS MOC Template Submission Format

Each MCP will be required to submit its ECM and ILOS MOC Template to DCCHS for review and approval in two parts:

- **Part 1: due 6 months prior to implementation:**
  - MCP's description of how it will meet all ECM and ILOS contract requirements
  - MCP's Policies and Procedures describing how it will administer ECM and ILOS with contracted ECM and ILOS Providers
  - WPC and HHP Transition Plan to ECM and ILOS
- **Part 2: due 3 months prior to implementation:**
  - Detailed ECM and ILOS Provider capacity by County
  - ECM and ILOS Provider Contract language



# ECM and ILOS Model of Care Template Submission Timeline

MCPs will update the MOC Template as necessary at six-month intervals to account for phased implementation of ECM target populations and/or the addition of any new ILOS.

MCPs must notify DHCS at least 60 days prior to implementation about any other modifications to its MOC.

Phase Go-Live Date	MOC Template	Submission Due Date
January 1, 2022	MOC Part 1	July 1, 2021
	MOC Part 2	October 1, 2021
July 1, 2022	MOC Part 1	January 1, 2022
	MOC Part 2	March 1, 2022
January 1, 2023	MOC Part 1	July 1, 2022
	MOC Part 2	October 1, 2022



# **Technical Assistance & Implementation Engagement Activities**



# ECM and ILOS Technical Assistance and Implementation Engagement Activities

- To support these ambitious reforms, DHCS will offer a range of Technical Assistance (TA) resources and implementation engagement activities:
- **Core TA Resources**
  - Frequently Asked Questions (FAQ) document (*updated regularly*)
  - Fact Sheets
  - Toolkits (*to support regional partner convenings*)
  - Informational webinar slides
- **Implementation Engagement Activities**
  - Informational webinars
  - ECM/ILOS inbox submission/responses
  - MCP ECM ILOS meetings
  - On-demand regional convenings with MCPs, providers, counties
  - Continued WPC / HHP Learning Collaboratives
  - Standing calls with associations



# Public Comment Period Process





# Public Comment Process

## Public Comment Period

- The public comment period for the ECM & ILOS draft documents ends on **March 12, 2021**.
- All comments should be submitted to DHCS by email at the following address: [CaAIMECMILOS@dhcs.ca.gov](mailto:CaAIMECMILOS@dhcs.ca.gov)
- DHCS will review stakeholder feedback and finalize in April.

## ECM/ILOS Resources

- ECM and ILOS-related materials, including the Requirements Documents and Coding Guidance, can be found on the [DHCS CaAIM Website](#). A dedicated DHCS CaAIM ECM and ILOS website is forthcoming.



# Q & A

Please visit the [DHCS CaAIM Website](#) for more information on CaAIM and to access the ECM and ILOS required documents.

Please send questions or comments to [CaAIMECMILOS@dhcs.ca.gov](mailto:CaAIMECMILOS@dhcs.ca.gov)



**Thank You**