

Attachment HH
WPC Pilot Requirements and Application Process

I. Application Process

a. Release of WPC Pilot Application and Guidance

- i. By April 1, 2016, or within 90 days following approval of the WPC Pilot Requirements and Metrics, Attachment MM, WPC Pilot Requirements and Application Process, Attachment HH, and WPC Reporting Evaluation, Attachment GG, whichever is later, the State will publish a WPC Pilot application (including a structured application template), the list of the entities eligible to apply as a Lead WPC Pilot Entity (“Lead Entity”), the application process, detailed timelines, data and reporting requirements, and selection criteria.
- ii. At least 10 calendar days prior to the planned publication date, the State will share a courtesy copy of the draft application with CMS, and consider any timely comments and feedback that CMS may provide.
- iii. Upon release of the application and accompanying materials, the State will conduct a conference call open to all interested applicants to help explain the opportunity and application, and answer prospective applicants’ questions.
- iv. The application shall include a description about the type and quantity of data that WPC Pilots will be required to submit for the mid-year and annual reports, as specified in Attachments GG and MM. It shall also include mid-point and final evaluation requirements as set forth in STC 123 which are to:
 - a. Improve coordination across participating entities including and information sharing;
 - b. Improve beneficiary health outcomes;
 - c. Reduce avoidable utilization of emergency and inpatient services (ED, hospital and psychiatric inpatient);
 - d. Increase access to social services;
 - e. Improve care coordination across participating entities; and
 - f. Improve housing stability, if applicable.
- v. Applicants shall attest that they will report and submit timely and complete data to the State in a format specified by the State. Incomplete and/or non-timely data submissions may lead to a financial penalty after multiple occurrences and technical assistance is provided by the State. Applicants shall also attest that federal funding received shall be returned if the Pilot, or a component of it as determined by the state, is not subsequently implemented. The application shall include information about the State’s role and the role of the Lead Entity with regard to pilot monitoring, provision of technical assistance, and imposition of corrective action and Pilot termination.

- vi. The application shall include the total and maximum amounts of funding available for the WPC Pilots for each program year, and the process the State will use to select and approve WPC Pilots.
The application shall include a structured template for applicants to address the required elements, including those listed in I.b.

b. Required Application Elements

- i. WPC Pilot applicants shall address all elements in STC 117(b).
- ii. WPC Pilot applicants shall identify high-risk, high-utilizing Medi-Cal beneficiaries in the geographic area that they serve and assess their unmet need, as described in WPC Pilot Special Terms and Conditions STC 112. Applications shall identify the target population, the expected number of individuals served or affected by the Pilot, and the number of those individuals that are Medi-Cal beneficiaries.
- iii. Applicants shall list all Universal and Variant metrics that they plan to meet for each program year, how they will document their achievement of metrics, and describe how payments for pilots will comport with STC 113, given the three broad aims of WPC.
- iv. Applicants shall define and describe the services they will provide that are not otherwise covered or directly reimbursed by Medi-Cal. If housing services are to be provided or a housing pool is to be utilized, the applicant must be precise about which services will be funded by Pilot funds, and limited to housing-related activities and services described in the June 26, 2015 CMCS Informational Bulletin. The applicant must describe the relationship between Pilot funding and provision of services broadly, and how federal financial participation will be received only for services provided to Medi-Cal beneficiaries.
- v. Applicants shall identify as Pilot participants at least one Medi-Cal managed care health plan operating in the geographic area of the Pilot, both the health services and specialty mental health agencies or department, at least one other public agency or department, and at least two community partners that have significant experience serving the target population, in accordance with STC 115.
- vi. Applicants shall make an attestation that the WPC Pilot lead entity will enter into an agreement with the State, if necessary (as specified by the State), which specifies the requirements of the WPC Pilot, including data sharing agreement in accordance with STC 118.
- vii. Applicants shall make an attestation that the WPC Pilot lead entity shall agree to help develop and participate in regular learning collaboratives to share best practices among Pilot entities, in accordance with STC 119.
- viii. Applicants shall make attestation that the funds transferred for the IGT qualify for federal financial participating pursuant to 42 CFR 433, subpart B, and are not derived from impermissible sources such as recycled Medicaid payments, federal money excluded from use as state match, impermissible taxes, and non-bona fide provider-related donations in accordance with STC 126.a.

- ix. Applicants shall make attestation that they will respond to general inquiries from the State pertaining to the WPC Pilot initially within one business day after acknowledging receipt and provide requested information within five business days, unless an alternate timeline is approved or determined necessary by the State. The State will consider reasonable timelines that will be dependent on the type and severity of the information when making such requests.
 - x. Applicants shall acknowledge that payments for WPC pilots will be contingent on certain deliverables or achievements, denoted in STC 126(f), and will not be distributed or may be recouped if pilots fail to demonstrate achievement or submission of deliverables.
- c. **Submission of WPC Pilot Applications by Lead Entities**
- i. Applications shall comply with all application processes and requirements as specified by the State, including but not limited to those elements listed in Whole Person Care Special Terms and Conditions STC 117(b).
 - ii. Lead Entities shall submit complete WPC Pilot applications consistent with the application requirements listed in STC 117 and Attachment HH to the State by May 15, 2016, or 45 days after the State issues the WPC Pilot application, whichever is later.
 - iii. As part of the review and approval process described in Section below, funding shall be designated for the applications. In the event that available funding remains within the annual limits of the WPC Pilot, additional funding may be requested by approved WPC Pilot sites or applications may be requested and accepted by the state after the initial application period. Nothing shall preclude an applicant from reapplying with a strengthened application if they were not approved in the first round, following request by the State. All initial application requirements would remain in effect, with the exception of specified dates.

II. State Review Process

- a. Within 60 days after submission of the application, the State will complete its review of the application, respond to the Lead Entity in writing with any questions, concerns or problems identified. Upon receipt, the Lead Entity will respond to questions and concerns in writing within 5 business days.
- b. Within 30 days after submission of the final responses to the State's questions, the State will complete its review of the application and shall take action on the application and notify the applicant. Notification to CMS of recommended approved applications by the State will also occur.
- c. Within 10 days of the State's notification to CMS of the State approval of APC Pilot applications, CMS shall notify the State of any concerns or questions regarding final approval. Within 10 days of final approval, the Lead Entity shall formally accept or decline approval of the application.
- d. In the event that an approved WPC Pilot application is approved for less than 90 percent of its requested funding, the State shall allow the Lead Entity to withdraw its application. The State shall offer the WPC Pilot the opportunity to modify its

application per the reduction in funding during the question and answer process, as determined appropriate by the State.

III. Pilot Funding

- a. The State shall review each WPC Pilot application and consider equal valuation across requests. The State shall consider differences in proposed interventions, target populations, and geographic areas when conducting this review.
- b. The State shall issue no sooner than October 1, 2016 guidance to WPC Pilots specifying when funding may be decreased prospectively and retrospectively as a result of a WPC Pilot not completing a component of the Pilot's intervention(s) as specified in its approved application, and non-progress on universal and/or variant metrics, as determined by the State.

IV. Pilot Termination

- a. The State may suspend or terminate a WPC Pilot if corrective action has been imposed and persistent poor performance continues.
 - i. If a deficiency is identified by the State, the State shall first provide technical assistance to the WPC Pilot.
 - ii. If the WPC Pilot continues to demonstrate poor performance, a corrective action plan (CAP) will be imposed. The CAP will include specific milestones and timelines as approved by the State. The State will work with the WPC Pilot to develop the CAP; however, final issuance of the CAP will be done by the State.
 - iii. If the WPC Pilot does not come into compliance with the CAP, the State may impose penalties, sanctions, or terminate the WPC Pilot.
- b. Should a WPC Pilot be terminated, the State shall provide notice to the Pilot and request a close-out plan due to the State within thirty calendar days unless significant harm to beneficiaries is occurring in which case the State may request a close-out plan within ten business days. The State shall approve the close-out plan upon determining all components are acceptable. The close-out plan shall include:
 - i. A timeline for close-out of the WPC Pilot;
 - ii. A process to notify all Pilot participating entities of termination of the Pilot;
 - iii. A process to notify all participating beneficiaries of termination of the Pilot which will include:
 1. The effective date of the termination;
 2. A description of how the termination will affect the beneficiary's access to services;
 3. Who the beneficiary should call if they need information or have questions about the termination;
 4. A referral to a community resource or entity that can provide any of the terminated services, whenever possible.

Notices shall indicate that disenrollment from the Pilot will be terminated within thirty days of the date of the notice. The State may determine a shorter time frame should it be determined that beneficiary harm is

occurring. Notices shall be approved by the State and must be mailed in the appropriate threshold language.

- iv. A process to call all beneficiaries a minimum of five times prior to the termination. The call script shall include the same information included in the aforementioned notices and shall be approved by the State.
- v. A process for notifying the public in the geographic area where the WPC Pilot operates of its termination.
- vi. A timeline for reporting final data and information to the State as required in Attachments GG and MM in a manner specified by the State.
- vii. A budget to close out the Pilot.

V. Learning Collaboratives

- a. WPC Pilot lead and participating entities shall participate in all WPC learning collaborative activities. Participation of lead and/or participating entities in any specific learning collaborative activity shall be determined by the State.
- b. Learning collaborative activities shall be structured to provide information about and assist with Pilot implementation and close-out; share best practices and learnings across WPC Pilots; and for the State to provide information, discuss requirements, and report data about the Pilots.
- c. A subset of WPC Pilot lead entities shall be identified to assist the State with planning and providing direction about how learning collaboratives will be structured.
- d. The State shall convene a minimum of bi-weekly calls during the first year after approval of Pilot applications to discuss implementation issues, answer Pilot questions, and clarify Pilot requirements. The frequency of these calls shall be decreased following this initial year dependent on the need for them, however, shall be no less than monthly.
- e. The State shall convene a minimum of two in-person learning collaboratives during each WPC program year with the exception of year 1. These meetings shall be focused on the sharing of best practices across WPC pilots; when possible, national policy and practice information will be shared; reporting of WPC Pilot performance; and to help establish working relationships across pilots to promote discussion and sharing of information amongst pilots in between meetings without direction.