

## Tell Us About It!: Advocate for Integrated Care for Illinois' Duals

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### Agenda

- Avisery Introduction
- Welcome Remarks
- What are Dual Eligible Special Needs Plans (D-SNSPs)?
- California's 2023 Transition to D-SNPs
- Breakout: Priorities for D-SNPs in Illinois
- Wrap-Up





Avisery by AgeOptions
trains professionals
on how to help
consumers navigate the
complexities of
Medicare & Medicaid.





#### **What Avisery Does**

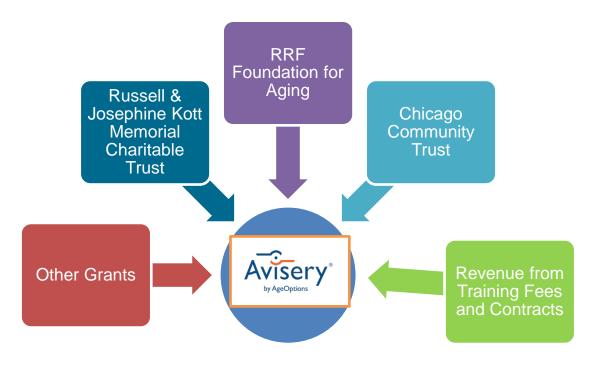


Provide **TECHNICAL ASSISTANCE** to guide professionals in their work with consumers

**ADVOCATE** for administrative rule and legislative changes to enhance access and affordability



#### 2023 Sources of Revenue



Thank You!!



## **Welcoming Remarks**

Diane Slezak
President and CEO
AgeOptions





# What are Dual Eligible Special Needs Plans (D-SNSPs)?



#### **Background**

- Financial Alignment Initiative (FAI): CMS partnering with states to test integrated care models for Medicare and Medicaid enrollees
  - 3-way contract between CMS, the state, and managed care plans
  - In Illinois: Medicare-Medicaid Alignment Initiative (MMAI) demonstration project in Illinois
    - Started in pilot counties in 2014 & went statewide in 2021



#### **MMAI** Transition to D-SNPS

- CMS ending the FAI demonstration project by December 31st, 2025
- Illinois will be transitioning to Dual Eligible Special Needs Plans
- In October 2022, HFS released a timeline of stakeholder outreach, policy development, and operational steps
- Plans must notify CMS by November 2024 of their intent to apply to offer D-SNP in Illinois
  - HFS contracts should ideally be in place prior to this date



#### Dual Eligible Special Needs Plan (D-SNP)

- D-SNPs are Medicare Advantage plans for dually eligible individuals (those with Medicare and Medicaid)
  - Integrated for dually eligible individuals
  - Only for full duals
  - Multiple types of D-SNPs which vary by how integrated they are.



## **Degrees of Integration**

#### **Fully Integrated (FIDE-SNP)**

Plan covers all Medicaid services. All care is managed and offered through the same legal entity, including behavioral health and LTSS. Capitated Payments are received for all services

#### **Highly Integrated (HIDE-SNP)**

Plan covers most Medicaid services, but some services may be carved out and delivered through a parent company or fee for service. Capitated payments are not required

#### **Coordination Only D-SNP (CO D-SNP)**

Plan must hold a contract coordinating service delivery and must notify the state when someone is hospitalized. No other coordination between the state and the plan is necessary

 The more 'integrated' the D-SNP model, the more oversite the state can place over the D-SNP plan's contract.



#### **How D-SNPs May Look In Illinois**

- Require all D-SNPs be FIDE D-SNPs (the closest to MMAI)
  - Covers all Medicare and Medicaid benefits, including LTSS and Medicare skilled nursing facility
  - Coordinates benefits using aligned care management and networks
- FIDE D-SNPs must be Exclusively Aligned
  - operated by the same company, with fully integrated enrollee materials, single ID cards, and unified appeal processes



#### **How D-SNPs May Look in Illinois**

In Illinois' transition plan here is what they are considering requiring:

- Cover all Medicaid benefits through FIDE D-SNP (rather than Medicaid Managed care plan)
- Dedicated staff trained in Medicare and Medicaid
- Require the MA company to have a participating HealthChoice IL plan
- Have D-SNPs do default enrollment
- D-SNP plan networks can either cover the whole state or only Cook County



#### **Default Enrollment**

- Default enrollment may be required of D-SNPs
  - Allows a person who is currently enrolled in a MCO plan to be enrolled into an affiliated D-SNP once they become eligible for Medicare
- Would happen when someone in a HealthChoice IL plan becomes enrolled into Medicare.



#### **Home Care Ombudsman**

- The Home Care Ombudsman assisted MMAI members with complaints, appeals, and continuity of care issues.
  - State received federal funding for this program
- Due to FAI ending, the state no longer receives funding
- Illinois has said they intend to continue funding the Home Care Ombudsman program through the budget of the Department of Aging



#### **Proposed Rule for CY 2025**

- CMS has a proposed rule for Medicare Advantage plans and Part D plans that will affect 2025 D-SNPs
  - Create a new integrated care SEP for individuals to enroll in D-SNPs once per month
  - Limit out of network cost sharing for D-SNPs that are PPOs in 2026 for specific services
  - Lower the threshold for D-SNP "look-alikes"



#### **D-SNP Contracts**

- The D-SNP plan requirements will come from a State Medicaid Agency Contract (SMAC). The SMAC will determine:
  - Default enrollment
  - LTSS and Behavioral Health coverage
  - Selectively contract with D-SNPs or Medicaid Managed Care plans that offer alignment
    - Exclusive Aligned Enrollment
  - Contract directly with D-SNPs to cover Medicaid benefits
  - Require complete service area alignment

- Deeming
- Required enhanced care coordination methods
- Continuity of care transition periods
- Require D-SNPS to send data to the state for oversight purposes
- Require state review of DSNP materials related to Medicaid Benefits
- Contract with community agencies
- Partner with D-SNPS to develop supplemental benefits packages that compliment Medicaid benefits



#### CA vs. IL Medicaid Managed Care and FAI

- CA Medicaid Managed Care has 6 models of care
- 2023 statewide transition to mandatory Medicaid Managed Care for duals.
  - LTSS services carved in beginning 2023
- CA's FAI: Cal MediConnect
  - o Ended on Dec 31, 2022.
  - In 7 counties only
  - Received coordinated Medicare and Medicaid benefits



#### CA vs. IL: D-SNPs

	California	Illinois
Program Status	Started Jan 1, 2023	Begin Jan 1, 2026
D-SNP Type	Aligned D-SNPs, 1 FIDE D-SNP	FIDE D-SNP
Enrollment	Aligned enrollment	Default enrollment
Alignment	Have exclusively aligned D-SNP and non-exclusively aligned D-SNP	Exclusively Aligned
Covered Services	All Medicare and Medicaid services, with LTSS and behavioral health carved out	All Medicare and Medicaid services including LTSS and behavioral health
Continuity of Care	12 months	Information Not Available Yet
Deeming	At least 3 months	Information Not Available Yet



# California's 2023 Transition to D-SNPs



## Tiffany Huyenh-Cho



Tiffany Huyenh-Cho is the Director of California Medicare and Medicaid Advocacy at Justice in Aging. At Justice in Aging, Tiffany advocates at the state and federal role to improve the systems serving low-income older adults eligible for Medicare and Medicaid, including California's Financial Alignment Incentive program. Her efforts focus on enhancing coordination between Medicare and Medicaid and expanding access to Medicaid. Tiffany has 9 years of experience working in direct legal services representing individuals with Medicare and Medicaid and resolving eligibility barriers.



## JUSTICE IN AGING FIGHTING SENIOR POVERTY THROUGH LAW

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Since 1972 we've focused our efforts primarily on fighting for people who have been marginalized and excluded from justice, such as women, people of color, LGBTQ individuals, and people with limited English proficiency.



#### California Model

- Robust stakeholder engagement
  - Outreach, notices, stakeholder webinars
  - Ombudsman, disability rights organizations, community based organizations
- Overall successful transition 99% transferred to new D-SNP
- System error led to erroneous disenrollment notices late 2022



#### Advocacy

- Success:
  - Statewide Ombudsman Program
  - Enhanced Continuity of Care Protections
  - Outreach outbound telephone calls
  - Aligned network
- Not adopted
  - Deeming of Medicaid services
  - Redetermination assistance
  - More integrated model (FIDE/HIDE)



#### Challenges

- Multiple simultaneous transitions & changes
  - Public health unwinding, mandatory managed care enrollment for all dual eligibles
- Strategic communications plan
  - Disseminate info quickly



#### **Future Asks**

- Comprehensive deeming
- Additive supplemental benefits
- Comprehensive care coordination
  - Alignment with Medicaid-only initiatives
  - Help with renewals



#### Resources

- California Specific
  - D-SNP Policy Guide
  - State Medicaid Agency Contract
  - Outreach Notices
- National
  - Integrated Care Resource Center
    - State contracting, aligning enrollment, oversight & monitoring





## Questions?



#### **Breakout Discussion Questions**

Take 1-2 minutes to write down or think- What are 3 things that are the most important for you to advocate for including in the SMAC?

- 1. Why were the three strategies important to you?
- 2. What are opportunities for improvement in the D-SNP model?



#### Resources

- IL Department of Healthcare and Family Services. 2022. Illinois' Transition from Medicare-Medicaid Alignment Initiative to Fully Integrated Dual Special Needs Plan. <u>Available at:</u>
   <a href="https://hfs.illinois.gov/content/dam/soi/en/web/hfs/sitecollectiondocuments/mmaitransitionplan2022.pdf?wcmmode=disabled</a>
   <a href="https://hfs.illinois.gov/content/dam/soi/en/web/hfs/siteco
- Integrated Care Resource Center. "Definitions of Different Medicare Advantage Dual Eligible Special Needs Plan (D-SNP) Types in 2023 and 2025." 2022. Available at:
   <a href="https://integratedcareresourcecenter.com/sites/default/files/ICRC\_DSNPDefinitions\_2023-2025\_0.pdf">https://integratedcareresourcecenter.com/sites/default/files/ICRC\_DSNPDefinitions\_2023-2025\_0.pdf</a>
- Integrated Care Resource Center. "Exclusively Aligned Enrollment 101: Considera? ons for States Interested in Leveraging DSNPs to Integrate Medicare and Medicaid Benefits." 2022. Available at: https://www.mathematica.org/publications/exclusively-alignedenrollment-101-considerations-for-states-interested-in-leveraging-dsnps
- Justice in Aging. Dual Eligible Special Needs Plans (D-SNPs): What Advocates Need to Know. 2022. Available at: <a href="https://justiceinaging.org/wp-content/uploads/2021/12/Dual-Eligible-Special-Needs-Plans-Issue-Brief.pdf">https://justiceinaging.org/wp-content/uploads/2021/12/Dual-Eligible-Special-Needs-Plans-Issue-Brief.pdf</a>
- MAC PAC, Improving Integration for Dually Eligible Beneficiaries: Strategies for State Contracts with Dual Eligible Special Needs
  Plans. 2021. Available at: <a href="https://www.macpac.gov/wp-content/uploads/2021/06/Chapter-6-Improving-Integration-for-Dually-Eligible-Beneficiaries-Strategies-for-State-Contracts-with-Dual-Eligible-Special.pdf">https://www.macpac.gov/wp-content/uploads/2021/06/Chapter-6-Improving-Integration-for-Dually-Eligible-Beneficiaries-Strategies-for-State-Contracts-with-Dual-Eligible-Special.pdf</a>





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#### Thank you for your time!

