



## **Behavioral Health and Intellectual/Developmental Disability Tailored Plan**

### **Tailored Care Management Provider Manual**

**Draft as of 12/5/19**

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## **Section I: Introduction**

As North Carolina transitions its Medicaid and NC Health Choice programs from a predominantly fee-for-service delivery system to managed care, the North Carolina Department of Health and Human Services (the Department) is focused on building robust and effective models for managing beneficiaries' comprehensive needs through care management. The Tailored Care Management model will be a critical element of the Behavioral Health and Intellectual/Developmental Disability (BH I/DD) Tailored Plans, which are set to launch in July 2021.<sup>1</sup> The Department strongly believes that care management should be provider-based and performed at the site of care, in the home or in the community, through face-to-face interaction between beneficiaries, providers, and care managers. Provider-based care management will promote whole-person care, foster high-functioning integrated care teams, and drive towards better health outcomes.

**While it is not a requirement of Tailored Care Management that provider organizations provide colocated or integrated services, the model will require provider organizations to coordinate physical health, behavioral health, I/DD and TBI services.** The Department recognizes that integrating physical and behavioral health care while addressing nonmedical factors that impact health for the BH I/DD Tailored Plan population is a major change and will take time to implement. The Department's vision is that Tailored Care Management will provide the "glue" for integrated care under BH I/DD Tailored Plans, fostering coordination and collaboration among care team members across disciplines and settings. Through the Tailored Care Management model, providers and BH I/DD Tailored Plans will be asked to work closely together in new and innovative ways.

The Department is investing in the Tailored Care Management model to support the major changes ahead by pursuing the Health Home State Plan option for the model as described below, which will enable the Department to obtain enhanced federal matching funds. The Department is also planning to provide "capacity building" funding for provider organizations that will provide Tailored Care Management. More details on this opportunity will be forthcoming. Providers who apply early for certification may have an advantage in accessing the capacity building funding.

**The Department's vision is that care managers affiliated with Advanced Medical Home Plus (AMH+) practices and Care Management Agencies (CMAs) will provide Tailored Care Management.** This manual is a resource for provider organizations who are interested in playing a central role in Tailored Care Management and are considering becoming certified as an AMH+ or a CMA, expanding on initial information provided in the Department's [policy paper](#) in May 2019.

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<sup>1</sup> BH I/DD Tailored Plans are fully integrated managed care plans providing the full range of physical health, BH, I/DD, TBI, LTSS, pharmacy, and unmet health-related resource needs services. BH I/DD Tailored Plans are targeted toward individuals with significant BH disorders, I/DDs, and TBI.

This manual includes:

- A description of the Tailored Care Management model and the functions AMH+ practices and CMAs will be expected to perform
- Criteria for AMH+ and CMA certification
- Process and timeline for certification
- Preliminary information about payment
- Information about AMH+ and CMA oversight after the launch of BH I/DD Tailored Plans.

**Providers should note that many of the details contained in this manual will also be contained within the Request for Applications (RFA) for BH I/DD Tailored Plans that will be released early in 2020. This RFA will govern the model. The Department does not anticipate the content of the RFA to depart from this manual. However, to the extent that any requirements differ in the RFA, the Department will issue an update to this manual after the release of the RFA to clarify any such differences.**

The Department looks forward to further engagement with providers, as well as LME-MCOs, in relation to this certification process over the coming months. Questions about Tailored Care Management can be directed to Kelsi A. Knick at [Kelsi.Knick@dhhs.nc.gov](mailto:Kelsi.Knick@dhhs.nc.gov).

## **Section II: Beneficiary Eligibility for Tailored Care Management**

The Tailored Care Management model is embedded in the design of BH I/DD Tailored Plans. Like Standard Plans, BH I/DD Tailored Plans will be fully integrated managed care products; BH I/DD Tailored Plans will provide a robust set of services to address members' physical health, behavioral health, I/DD, TBI, LTSS, pharmacy, and unmet health-related resource needs.<sup>2</sup> BH I/DD Tailored Plans will offer a more extensive set of behavioral health and I/DD benefits than Standard Plans and will be the only plans to offer current 1915(b)(3) services, 1915(c) Innovations and TBI waiver services, and State-funded services. BH I/DD Tailored Plans are targeted toward Medicaid beneficiaries with serious mental illness (SMI), serious emotional disturbance (SED), severe substance use disorders (SUD), intellectual/developmental disabilities (I/DDs), and traumatic brain injuries (TBIs) as defined in Session Law 2015-245 as amended by Session Law 2018-48.<sup>3</sup> Full BH I/DD Tailored Plan eligibility criteria can be found on the Department's Medicaid Transformation website.<sup>4</sup>

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<sup>2</sup> Since all beneficiaries under Tailored Care Management will be BH I/DD Tailored Plan members, this manual uses the term "member" in describing Tailored Care Management model requirements.

<sup>3</sup> The full BH I/DD Tailored Plan eligibility criteria are available in the BH I/DD Tailored Plan Eligibility and Enrollment Final Policy Guidance. Individuals eligible for BH I/DD Tailored Plans will by default remain in Fee-for-Service Medicaid and LME-MCOs prior to BH I/DD Tailored Plan launch, but will be able to choose to enroll in a Standard Plan.

<sup>4</sup> The full BH I/DD Tailored Plan eligibility criteria are available in the BH I/DD Tailored Plan Eligibility and Enrollment Final Policy Guidance and BH I/DD Tailored Plan Memo on Eligibility and Enrollment Updates.

The Department will conduct regular reviews of encounter, claims, and other data to identify beneficiaries who are eligible for a BH I/DD Tailored Plan.<sup>5</sup> Beneficiaries who meet the eligibility criteria will be auto-enrolled in the BH I/DD Tailored Plan in their region, unless they actively select a Standard Plan.

**Tailored Care Management will be available to all BH I/DD Tailored Plan members continuously throughout their enrollment**, including individuals enrolled under North Carolina's 1915(c) Innovations and TBI waivers, with the exceptions of (1) individuals obtaining Assertive Community Treatment (ACT); (2) individuals residing in Intermediate Care Facilities for Individuals with Intellectual Disabilities (ICF-IID); (3) children participating in Care Management for At-Risk Children (CMARC); and (4) children participating in the High Fidelity Wraparound (HFW) program.<sup>6</sup> The reason for these exclusions is that these services substantially duplicate Tailored Care Management. BH I/DD Tailored Plans will be responsible for developing and implementing protocols to ensure that members moving between these services and the Tailored Care Management model experience smooth transitions. Upon enrollment in a BH I/DD Tailored Plan, members will be auto-enrolled in Tailored Care Management unless they are receiving one of the above duplicative services, or unless they opt out. Members will be able to opt out of the model at any time, as described below.

For individuals enrolled in the 1915(c) Innovations and TBI waivers, Tailored Care Management will encompass care coordination. Care managers serving individuals enrolled in one of these HCBS waivers will be responsible for addressing members' whole-person needs alongside coordinating their HCBS waiver services.

### **Section III: Role of Provider Certification in Tailored Care Management**

#### ***1) Overview***

When BH I/DD Tailored Plans launch, the Department will hold the BH I/DD Tailored Plans accountable for quality of care and outcomes for the BH I/DD Tailored Plan population. BH I/DD Tailored Plans will assume responsibility for assembling provider networks, executing contracts with network providers, and making payments for services, including Tailored Care

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<sup>5</sup> Since there will be individuals who will benefit from BH I/DD Tailored Plan enrollment but will not be identified by available data, there will also be a BH I/DD Tailored Plan eligibility request form via which beneficiaries can request a review to determine whether they are eligible to enroll in a BH I/DD Tailored Plan.

<sup>6</sup> HFW is an evidence-based service carried out by a NC Wraparound Team, for youth with serious emotional disturbance or youth with serious emotional disturbance and a co-occurring substance use disorder and/or I/DD. The Department is committed to expanding access to HFW with the launch of BH I/DD Tailored Plans. The HFW program will be distinct from Tailored Care Management. Providers will be eligible to provide HFW if they are credentialed by the Department or a vendor designated by the Department as meeting the fidelity standards of the model. Additionally, the Department intends to require HFW providers to meet the same health IT standards as are contained in this manual for Tailored Care Management. Children in the HFW program who are enrolled in BH I/DD Tailored Plans will be eligible for Tailored Care Management as soon as they transition out of HFW. More guidance for providers on HFW will be forthcoming.

Management. Prior to BH I/DD Tailored Plan go-live, the Department will determine provider readiness for Tailored Care Management through a certification process described in this manual. **Prior to contracting with a BH I/DD Tailored Plan to perform Tailored Care Management at BH I/DD Tailored Plan go-live, the Department requires that each provider organization becomes certified with the Department as an AMH+ or CMA.** After BH I/DD Tailored Plan go-live, BH I/DD Tailored Plans will assume full responsibility for certification and oversight of AMH+ practices and CMAs.

Provider organizations participating in this model will be defined as follows:

- **AMH+ practices** will be primary care practices actively serving as AMH Tier 3 practices,<sup>7</sup> whose providers have experience delivering primary care services to the BH I/DD Tailored Plan eligible population or can otherwise demonstrate strong competency to serve that population. These AMH+ practices will hold primary responsibility for providing integrated, whole-person care management under the Tailored Care Management model. **AMH+ practices may, but are not required to, offer integrated primary care and behavioral health or I/DD services.** To be eligible to become an AMH+, the practice must intend to become a network primary care provider for BH I/DD Tailored Plans. While the Department expects only a minority of AMH Tier 3 practices to be ready to obtain certification as AMH+ practices at BH I/DD Tailored Plan launch, the Department’s vision is that the Tailored Care Management model will stimulate integration of Tailored Care Management within primary care practices over time.
- **CMAs** will be provider organizations with experience delivering behavioral health<sup>8</sup>, I/DD, and/or TBI services to the BH I/DD Tailored Plan eligible population, that will hold primary responsibility for providing integrated, whole-person care management under the Tailored Care Management model. To be eligible to become a CMA, an organization’s primary purpose at the time of certification must be the delivery of NC Medicaid, NC Health Choice, or State-funded services, other than care management, to the BH I/DD Tailored Plan eligible population in North Carolina. The “CMA” designation is new and will be unique to providers serving the BH I/DD Tailored Plan population.

AMH+ practices or CMAs must not be owned by, or be subsidiaries of, BH I/DD Tailored Plans.

## **2) Purpose of Certification**

The purpose of the provider certification process is to promote provider-based care management in the market while also setting up guardrails to ensure that providers are ready to perform this critical role by BH I/DD Tailored Plan launch. Through its contract with BH I/DD

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<sup>7</sup> To be eligible as an AMH+, a practice must be actively serving as an AMH Tier 3 for the purposes of Standard Plans. See AMH Provider Manual for information on how to enroll.

<sup>8</sup> Throughout this manual and throughout the design of Tailored Care Management, the Department is using the term “behavioral health” to encompass both mental health and substance use disorder services.

Tailored Plans, **the Department will require BH I/DD Tailored Plans to contract with all certified AMH+ practices and CMAs in each region for Tailored Care Management**, similar to the current requirement on Standard Plans to contract with all Tier 3 Advanced Medical Homes (AMHs).<sup>9</sup> The Department is aiming to align the timeline for certification with BH I/DD Tailored Plan procurement.

Tailored Care Management will be performed by a workforce spanning AMH+ practices, CMAs, CINs, and care managers based at BH I/DD Tailored Plans. Because it will take time to build adequate provider-based infrastructure, the Department anticipates that, in the short-term, the majority of members under Tailored Care Management will be assigned to BH I/DD Tailored Plan-based care managers. However, the Department's vision is to increase, over time, the proportion of actively engaged BH I/DD Tailored Plan members receiving care management from AMH+ practices and CMAs as described below (see Section III. 5. "Glide Path" to Provider-based Care Management).

### **3) Role of CINs and Other Partners in Certification**

The certification process described in this manual applies to individual AMH+ practices and CMAs. However, the Department recognizes that many AMH+ practices and CMAs will choose to operate within a larger affiliated organization. The Department refers to such organizations as "Clinically Integrated Networks or Other Partners." Clinically Integrated Networks (CINs) or Other Partners are entities with which provider practices choose to partner to share responsibility for specific functions and capabilities required to operate as an AMH+ practice or CMA.<sup>10</sup> As under the AMH program already in operation under Standard Plans, the Department will allow AMH+ practices and CMAs to work with CINs and Other Partners to meet certification requirements. **However, they are not required to do so to become certified.**

The Department's evaluation of each provider organization's application for AMH+ or CMA certification will include gaining an understanding of the role of any CIN/Other Partner in supporting or facilitating Tailored Care Management. In particular, where the AMH+ or CMA proposes to rely on CIN or Other Partner-employed care managers to carry out Tailored Care Management, the Department will look to ensure that care management is sufficiently integrated with the organization's practice team, as Tailored Care Management requires. Thus, certification will include an evaluation of whether the AMH+ or CMA has managerial control of care management staff, defined as the opportunity, at minimum, to a) approve

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<sup>9</sup> See "Programmatic Guidance on PHP Contracting Requirements for Tier 3 AMH Practices":

[https://files.nc.gov/ncdma/documents/Providers/Programs\\_Services/amh/AMH\\_Programmatic\\_Guidance\\_Contracting\\_12.17.18.pdf](https://files.nc.gov/ncdma/documents/Providers/Programs_Services/amh/AMH_Programmatic_Guidance_Contracting_12.17.18.pdf).

<sup>10</sup> Examples of functions and capabilities for which CINs/Other Partners may assume responsibility include data aggregation, risk stratification, and care management. A CIN could be part of a hospital or health system to which an organization already belongs or is otherwise affiliated, or a group of practices. CINs can partner with other entities, such as independent nonprofit organizations delivering data/analytic support and local care management to a practice or group of practices, or population health companies that have the capability to connect providers as integrated networks of care.

hiring/placement of a care manager and b) require a replacement for any care manager whose performance the AMH+ or CMA deems unsatisfactory.

CINs and Other Partners supporting AMH+ practices and CMAs may take many forms, and the Department encourages innovation and market movement to support this model. As a general rule, the Department will expect arrangements with CINs/Other Partners to include strong clinical leadership at the CIN/Other Partner level that has deep experience in NC Medicaid or Health Choice and/or has supported similar efforts in other states. Any subsidiaries of LME-MCOs, BH I/DD Tailored Plans or other health plans may not be considered CINs/Other Partners for the purposes of Tailored Care Management.

AMH+ practices and CMAs intending to work with a CIN or Other Partner must sign a formal agreement with that organization that ensures the CIN can receive and use patient data in compliance with HIPAA and state regulations, as well as any other data elements mutually agreed on by the practice and the CIN or Other Partner.

#### ***4) Overview of Certification Process***

The Department's certification process will be different and significantly more intensive than the attestation process for certifying AMHs that took place in 2018, given the higher need profile of the BH I/DD Tailored Plan population and the intensity of the model, as well as the more marked change relative to today's payment and delivery system. The certification processes will apply to the ramp-up period preceding BH I/DD Tailored Plan launch. **After launch, certification will be performed by BH I/DD Tailored Plans.** All providers interested in performing Tailored Care Management at the time of BH I/DD Tailored Plan launch (July 2021) must submit an application for certification starting in early 2020. Although there will be more than one opportunity to apply during 2020, the Department strongly encourages providers to apply during the first application phase. The Department intends to make capacity building funding available to providers on a first-come, first-served basis. More information about capacity building funding will be forthcoming.

The Department understands that the model is a significant shift from status quo for many providers. In particular, AMH+ practices will be required to expand the degree to which they coordinate with behavioral health, I/DD and TBI service providers, and CMAs will be required to expand the degree to which they coordinate with physical health providers. **The purpose of certification will be for providers to demonstrate either that they can perform the necessary functions and activities already or can show a credible pathway toward readiness at BH I/DD Tailored Plan launch.**

Under the certification process, the Department will first conduct an internal desk review of every application. The purpose of the desk review will be to determine whether the organization has the potential to satisfy the full criteria at BH I/DD Tailored Plan launch.

If the Department determines that an organization has the potential to meet all certification criteria by launch, the Department will arrange to conduct one or more site visits, starting in

the second half of 2020. These site visits will be designed not only to drive a final decision on certification, but to increase understanding of each organization’s capacity, strengths, and areas for improvement, including need for capacity building funding. **To accomplish these broader goals, the Department will collaborate with the BH I/DD Tailored Plan awardees for the region(s) in which the CMA or AMH+ operates to conduct these site visits.**

At the conclusion of the site visit(s), the Department will decide whether to certify each organization. The Department may certify an organization to provide Tailored Care Management in some regions but not others, or for some populations but not others, based on the organization’s capacity to serve each region and population.

A summary of the proposed timeline for AMH+ and CMA certification is as follows.<sup>11</sup> Site visits will not begin until after BH I/DD Tailored Plan procurement is concluded.

Round	Application Deadline	Desk Reviews/Site Visits
1	February 7, 2020	<ul style="list-style-type: none"> <li>• Desk reviews: February – March 2020</li> <li>• Site visits: June – December 2020</li> </ul>
2	April 2020	<ul style="list-style-type: none"> <li>• Desk reviews: April – May 2020</li> <li>• Site visits: June – December 2020</li> </ul>
3	September 2020	<ul style="list-style-type: none"> <li>• Desk reviews: Fall 2020</li> <li>• Site visits: Spring 2021</li> </ul>
4	December 2020	<ul style="list-style-type: none"> <li>• Desk reviews: through early spring 2021</li> <li>• Site visits: Spring 2021</li> </ul>

After the conclusion of the certification process, BH I/DD Tailored Plans will conduct readiness reviews and further site visits as part of contracting with AMH+ practices and CMAs. The purpose of the readiness reviews is to verify that each AMH+ and CMA is ready to perform the required Tailored Care Management functions set out in this manual.<sup>12</sup> At BH I/DD Tailored Plan launch, all criteria must be met.

### **5) “Glide Path” to Provider-based Care Management**

In the BH I/DD Tailored Plan Request for Applications (RFA), the Department will establish a four-year “glide path” to guide the growth of provider-based capacity. BH I/DD Tailored Plans will be required to meet annual targets established by the Department for the percentage of

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<sup>11</sup> This timeline is subject to change; the Department will keep stakeholders informed of any changes to the certification timeline.

<sup>12</sup> The Department distinguishes readiness review from pre-delegation auditing (for the purposes of National Committee for Quality Assurance (NCQA) health plan accreditation or for other purposes). The Department will prohibit BH I/DD Tailored Plans from conditioning AMH+ or CMA contracts upon pre-delegation audits or other monitoring activities that go beyond what is necessary to ensure that the provider organization has met the requirements in this manual for Tailored Care Management.

members actively engaged in Tailored Care Management via certified AMH+ practices and CMAs. The Department will assess BH I/DD Tailored Plans' compliance with annual target percentages in the first quarter of each BH I/DD Tailored Plan contract year. Ultimately, the Department's goal is for at least 80 percent of Tailored Care Management in each BH I/DD Tailored Plan region to be provider-based by July 2024, the beginning of the fourth year of BH I/DD Tailored Plan implementation.

## **Section IV: Key Features of Tailored Care Management Model**

### ***1) Summary of Tailored Care Management Model***

The overall goal of the Tailored Care Management model is improved health outcomes for BH I/DD Tailored Plan members. The design of the model has been shaped by the following guiding principles:

- **Broad access to care management.** Tailored Care Management will be available to all BH I/DD Tailored Plan members continuously throughout their enrollment, with limited exceptions, as detailed above.
- **Single care manager taking an integrated, whole-person approach.** To the maximum extent possible, each BH I/DD Tailored Plan member will receive integrated, whole-person care management from a single care manager with expertise and training in addressing behavioral health, I/DD, and/or TBI needs in addition to physical health needs and unmet health-related resource needs.
- **Person and family-centered planning.** Care planning for BH I/DD Tailored Plan members will be person-centered<sup>13</sup> and will consider the unique needs of the member. Family members and other informal caregivers can also serve as members of members' care teams, with members' consent. Tailored Care Management aligns with the North Carolina System of Care framework.<sup>14</sup>

The Tailored Care Management model will be considerably more intensive than the Standard Plan model. However, the design – particularly operational factors such as data sharing and health information technology (IT) expectations – will be aligned across Standard Plans and BH

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<sup>13</sup> Person-centered planning is a process of determining real-life outcomes with individuals and their families, as well as developing strategies to achieve those outcomes. Person-centered planning provides for the individual or the family of a member assuming an informed and in-command role for life planning, service, support, and treatment options. The person with a disability and his/her family or the legally responsible person directs the process and shares authority and responsibility with system professionals about decisions made.

<sup>14</sup> The North Carolina System of Care framework was developed to address the unique needs and challenges of children and youth with behavioral health needs. Children and youth with behavioral health needs are at increased risk of experiencing gaps in care because they often receive services from multiple systems (including health, education, child welfare and juvenile justice); are more likely to transition between Standard Plans and BH I/DD Tailored Plans as their diagnoses; and their acuity changes with age; their access to services may be impacted as they age out of school-related services. Effective care plans/ISPs must reflect both the needs of the child and their family.

I/DD Tailored Plans as much as possible to allow providers, particularly AMH Tier 3 practices that will become AMH+ practices, to take a population health approach that is as cohesive as possible across Standard and BH I/DD Tailored Plan populations.<sup>15</sup>

To accomplish statewide consistency and to ensure best possible outcomes, the Department is setting specific requirements that will apply to every member served under the Tailored Care Management model, **whether the member is being served by a BH I/DD Tailored Plan-based care manager or a provider-based care manager**. These standard requirements and design elements are detailed in this manual (see Section V. AMH+ and CMA Certification Requirements).

While the standardized elements must be in place for every member served under the model, the model will have flexibility to accommodate differing needs across the State and the diverse population that will be enrolled in BH I/DD Tailored Plans. Tailored Care Management may “look” different from one BH I/DD Tailored Plan member to another. For example, an adult with mental illness may need more support in a particular month to transition to independent housing.

### ***2) Role of Federal Health Home State Plan Option in Supporting Tailored Care Management***

To obtain enhanced federal Medicaid reimbursement for Tailored Care Management, the Department will submit a State Plan Amendment (SPA) to the Centers for Medicare & Medicaid Services (CMS) to add Tailored Care Management as a Health Home State Plan benefit. Each BH I/DD Tailored Plan will act as the designated Health Home for its members. In its role as a Health Home, the BH I/DD Tailored Plan will ensure that members have access to care management services that meet the requirements of this manual and federal Health Home requirements. The federal model is flexible according to the needs of states, as long as the model encompasses six “core” Health Home services and uses health IT to coordinate across these services.<sup>16,17</sup> The Tailored Care Management model will incorporate each of these core services.

### ***3) Assignment and Member Choice***

**Members will have the ability to choose their care management assignment.** To facilitate timely engagement in Tailored Care Management, the BH I/DD Tailored Plan will be responsible for assigning each eligible member to care management based at either an AMH+ practice, a CMA, or the BH I/DD Tailored Plan itself. **Members will be permitted to change their assigned**

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<sup>15</sup> For more information on the BH I/DD Tailored Plan population health management approach, see North Carolina’s Data Strategy for Tailored Care Management Policy Paper.

<sup>16</sup> The six required Health Home services are 1) comprehensive care management, 2) care coordination, 3) health promotion, 4) comprehensive transitional care/follow-up, 5) individual and family supports, and 6) referral to community and social support services. 42 U.S.C. § 18001

<sup>17</sup> Centers for Medicare & Medicaid Services: Health Homes Frequently Asked Questions Series II.

**care management approach (AMH+, CMA, or BH I/DD Tailored Plan) or individual care manager up to twice per year without cause and at any time with cause.**<sup>18</sup> BH I/DD Tailored Plans will be responsible for providing members with information about their care management assignment and options for changing their care management assignment.

The BH I/DD Tailored Plan will be required to prioritize assignment to an AMH+ practice or CMA to the maximum extent possible, given capacity. In order to make assignments in a person-centered way:

- The BH I/DD Tailored Plan will be required to take into account, and give preference to, existing provider relationships at an AMH+ practice or CMA within the BH I/DD Tailored Plan's region when making a care management assignment, unless there is a specific cause not to do so, including instances of conflicts of interest for Innovations and TBI waiver enrollees.<sup>19</sup>
- The BH I/DD Tailored Plan will be required to distribute members of all acuity levels<sup>20</sup> across AMH+ practices, CMAs, and plan-based care management rather than group members into one approach or another solely on the basis of acuity. The BH I/DD Tailored Plan must take into account complexity of physical health needs, as well as behavioral health and I/DD needs, when making a care management assignment.

Additional requirements for members enrolled in the Innovations or TBI waiver will be as follows:

- If the individual enrolled in the Innovations or TBI waiver has an existing relationship with a care coordinator who meets the Tailored Care Management qualifications and training requirements as described below, and is employed in the individual's BH I/DD Tailored Plan region, the BH I/DD Tailored Plan will be required to give the individual the option of choosing his/her previous care coordinator.
- Care management for Innovations and TBI waiver enrollees must comply with federal requirements for conflict-free case management for 1915(c) waiver enrollees. The BH I/DD Tailored Plan will be required to ensure that members do not obtain both 1915(c) waiver services and Tailored Care Management from employees of the same provider organization certified as a CMA.

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<sup>18</sup> Full details of the circumstances that constitute "with cause" will be included in the BH I/DD Tailored Plan RFA.

<sup>19</sup> In cases where children with medical complexity are receiving primary care through an AMH+ practice, the BH I/DD Tailored Plan will be required to give that AMH+ practice preference when assigning the beneficiary to a care management approach.

<sup>20</sup> The Department intends to establish a standardized methodology to assign each BH I/DD Tailored Plan Member to a Tailored Care Management acuity tier (e.g., high, medium, low) and will release additional detail on the methodology prior to BH I/DD Tailored Plan launch.

#### 4) Data Strategy and Data Sharing

The Department believes that effective, integrated, and well-coordinated care management depends on care team members having the ability to efficiently exchange timely and actionable member health information and use that information to monitor and respond to medical and nonmedical events that could impact a member's well-being. The success of Tailored Care Management will depend on BH I/DD Tailored Plans, AMH+ practices, CMAs, CINs and Other Partners, and pharmacies, as well as physical health, behavioral health, I/DD, TBI, LTSS, and social service providers collecting, using, and sharing data in support of an integrated and coordinated approach to care. The minimum health IT requirements for certification at the AMH+ and CMA level are provided below.

Building on its work with Standard Plans and the AMH program, the Department will define and standardize, as appropriate, the data flows that are essential to support Tailored Care Management.<sup>21</sup> BH I/DD Tailored Plans will be required to transmit the following data to AMH+ practices and CMAs or their designated CIN or Other Partner:

- **Member assignment files**, including:
  - Point-in-time assignment information, on at least a monthly basis;
  - Projected assignment information for the following month (to the extent information is available);
  - Information about members newly assigned to the BH I/DD Tailored Plan, within seven business days of enrollment; and
  - Notifications of any ad hoc changes in assignment as they occur, within seven business days of each change.
- **Acuity tiering and risk stratification information**, including up-to-date acuity tiering results<sup>22</sup> for each member and any other risk scoring/stratification the BH I/DD Tailored Plan has conducted. Alongside the scoring/stratification, BH I/DD Tailored Plans will be encouraged to share the types or categories of risk stratification model inputs (e.g., frequent hospital utilization) and any clinically relevant information identified through the risk score development process that can inform specific actions by the AMH+ practice or CMA.
- **Quality measure feedback**: BH I/DD Tailored Plans will be required to provide feedback on quality scoring results to each AMH+ /CMA on both an annual and interim basis as specified by the Department, and in a format to be determined by the Department.

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<sup>21</sup> Data specification guidance for the AMH program is available at <https://medicaid.ncdhhs.gov/amh-data-specification-guidance>.

<sup>22</sup> Beneficiaries will be grouped into acuity tiers based on level of need identified via a standardized methodology determined by the Department. Acuity tiers will impact payment rates. More detail on acuity tiering will be forthcoming.

- **Encounter and other related data:** BH I/DD Tailored Plans will be required to provide historical medical encounter data and pharmacy data directly to AMH+ practices and CMAs upon member assignment in Tailored Care Management. After initiation of care management, BH I/DD Tailored Plans will be required to provide updated encounter, provider, and member data at least monthly and updated pharmacy data at least weekly to AMH+ practices and CMAs (or more frequently as requested by the Department).

The Department is currently developing a process for overseeing and updating data specification guidance for the AMH program, including through the Data Subcommittee of the AMH Technical Advisory Group. Upon procurement of the BH I/DD Tailored Plans, the Department expects to engage AMH+ practices, CMAs and CINs involved in Tailored Care Management as part of this process.

AMH+ practices, CMAs and CINs involved in Tailored Care Management will be expected to comply with all federal, state, and Department privacy and security requirements regarding the collection, storage, transmission, destruction, and use of data including Medicaid claims and encounters. AMH+ practices or CMAs and any contracted CINs or Other Partners will be expected to have a valid and signed Data Use Agreement in place before submitting any request for data from a Behavioral Health I/DD Tailored Plan. AMH+ practices, CMAs and CINs or Other Partners must certify that their requests involve only their attributable BH I/DD Tailored Plan members and must restrict their use of the data for care management activities that are improving the quality and efficiency of care. AMH+ practices and CMAs and their CINs or Other Partners must establish appropriate administrative, technical, and physical safeguards that will provide a level and scope of security that is not lower than the level and scope of security requirements established by the following federal and State guidance:

- Office of Management and Budget (OMB) in OMB Circular No. A-130, Appendix III - Security of Federal Automated Information Systems
- Federal Information Processing Standard 200 “Minimum Security Requirements for Federal Information and Information Systems”
- Special Publication 800-53 “Recommended Security Controls for Federal Information Systems”
- The most recent Information Security and Privacy guidance shared by CMS
- North Carolina’s “Statewide Information Security Manual”
- North Carolina Department of Health and Human Services’ Privacy and Security Policies and Manuals

### ***5) Healthy Opportunities Pilot Program***

In October 2018, CMS approved North Carolina’s 1115 demonstration waiver request for a five-year period.<sup>23</sup> One component of the waiver provides the Department authority to implement a

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<sup>23</sup> North Carolina’s 1115 Demonstration Waiver Approval Letter and Special Terms and Conditions are available here.

\$650 million “Healthy Opportunities Pilot Program” to evaluate evidence-based, nonmedical services designed to directly impact health outcomes and costs.<sup>24</sup> Services provided through the Healthy Opportunities Pilot Program (the Pilot Program) aim to address four priority Healthy Opportunities domains:

- Housing instability;
- Transportation insecurity;
- Food insecurity; and
- Interpersonal safety.

The Department will begin delivering services through the Pilot Program in early 2021 in up to three regions of the state, to be identified in early 2020.<sup>25</sup> Medicaid managed care enrollees residing in the Pilot Program regions who meet eligibility criteria (at least one qualifying physical/behavioral health condition and one qualifying social risk factor) may be eligible to receive nonmedical services to address needs in the domains above. All BH I/DD Tailored Plans operating within a Pilot Program region will be required to participate in Pilot program implementation. Pilot Program services will be delivered by a network of human service organizations (HSOs) established and managed by Lead Pilot Entities (LPEs) that have contracts with all Standard Plans and BH I/DD Tailored Plans in their Pilot program region.

**Care managers based at BH I/DD Tailored Plans, AMH+ practices, and CMAs whose assigned enrollees reside in Pilot Program regions will be required to take on Pilot-related responsibilities.** These care managers will play a critical role in Pilot Program implementation, including:

- Assessing eligibility for Pilot services;<sup>26</sup>
- Recommending and obtaining BH I/DD Tailored Plan authorization for Pilot Program services;
- Obtaining enrollees’ consent for Pilot Program participation;
- Making referrals to HSOs that are contracted to deliver Pilot Program services;
- Coordinating Pilot-related services as part of overall care management;
- Reviewing and reassessing enrollee’s Pilot Program participation; and
- Participating in training, technical assistance, and other activities to support the Department’s oversight and evaluation of the Pilot Program.

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<sup>24</sup> Learn more about the Healthy Opportunities Pilots in the Policy Paper for Interested Stakeholders.

<sup>25</sup> Note that Pilot Program regions will be geographically distinct from Standard Plan and BH I/DD Tailored Plan regions. The Pilot Program regions may cross more than one BH I/DD Tailored Plan region and may include only portions of a BH I/DD Tailored Plan region.

<sup>26</sup> The BH I/DD Tailored Plans will have discretion to determine when to authorize Pilot Program services for those who meet eligibility criteria, in order to target and maximize the value of Pilot Program expenditures, subject to Department guidelines.

## **Section V: AMH+ and CMA Certification Requirements**

Full requirements for certification as an AMH+ or CMA are below. **At the time each organization applies for certification, the Department does not expect all requirements to be met in full but will assess whether the organization is on track to meet all requirements by BH I/DD Tailored Plan launch.** The following requirements apply equally to certification by the Department in the ramp-up to BH I/DD Tailored Plan launch; readiness reviews by the BH I/DD Tailored Plans; oversight of AMH+ practices and CMAs by BH I/DD Tailored Plans; and certification by BH I/DD Tailored Plans of new AMH+ practices and CMAs by BH I/DD Tailored Plans after launch of the program. To the extent applicable, all requirements below that apply to AMH+ practices and CMAs also apply to BH I/DD Tailored Plans.

### ***1) Provider Eligibility as an AMH+ or CMA***

To become a certified AMH+ or CMA, an organization must meet the definitions at Section III.I above. The Department will conduct certification of each AMH+ and CMA individually.<sup>27</sup> There is no minimum panel size to become certified as either an AMH+ or a CMA.

### ***2) Organizational Standing/Experience***

**2.1. Relevant experience.** The organization must demonstrate that its past experience positions it to provide Tailored Care Management to the BH I/DD Tailored Plan population, specifically the subpopulation(s) for whom it proposes to become a certified Tailored Care Management provider. All organizations entering the certification process will be required to indicate whether they will serve the adult and/or child and adolescent population, as well as one or more of the following specialty designation type(s):

- Behavioral health (including mental health and SUD);<sup>28</sup>
- I/DD; and/or
- Innovations waiver and/or TBI waiver.

Agencies that specialize in behavioral health will be required to demonstrate their capacity to serve populations with both mental health and SUD needs as soon as possible, if that capacity is not already in place. The organization must offer an array of services that are aligned with the needs of the target population(s) in North Carolina. The Department has a general expectation that each organization will be able to show at least a two-year history of providing services to

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<sup>27</sup> The Department will certify AMH+ practices at the practice site level, in alignment with the current AMH certification process. The Department will certify CMAs at the level of the entire organization. However, if a potential CMA spans multiple BH I/DD Tailored Plan regions, the Department will certify the organization at the level of each region.

<sup>28</sup> Organizations with the behavioral health specialty designation will not be required to provide both mental health and SUD services, but will be required to demonstrate expertise to provide Tailored Care Management for individuals with mental health and SUD needs through approved contracting arrangements.

the BH I/DD Tailored Plan population in North Carolina. However, the Department encourages organizations to build new capacity for Tailored Care Management as it rolls out.

**2.2. Provider relationships and linkages.** The organization must have active, working relationships with community providers that offer a wide scope of clinical and social services, including strong reciprocal relationships among relevant BH, I/DD, and primary care providers, in order to facilitate referrals among providers as well as provide formal and informal feedback and opportunities to share best practices.

**2.3. Capacity and sustainability.** The organization must have the capacity and financial sustainability to establish care management as an ongoing line of business, as evidenced by an audited financial statement. Tailored Care Management must be recognized by the organization's leadership and governing body as integral to the mission of the organization and as such be supported by a budget and management team appropriate to maintain Tailored Care Management as a high-functioning service line.

**2.4. Oversight.** The organization must be able to demonstrate that it has the appropriate structures in place to oversee the Tailored Care Management model. The Department will look for evidence of a strong governance structure. Organizations may demonstrate strong governance by showing that they have a governing board and bylaws in place; a committee structure that enables appropriate oversight of budget, other fiduciary matters, compliance, and conflicts of interest; and board approval of the application submitted by the organization.

### **3) Staffing**

**3.1. Care management staff.** The organization must be able to ensure that all care managers providing Tailored Care Management meet the following minimum qualification requirements, whether they are employed by the organization itself or employed at the CIN or Other Partner level:

- **Care managers serving all members must have the following minimum qualifications:**
  - Bachelor's degree in a field related to health, psychology, sociology, social work, nursing, or another relevant human services area; and
  - Two years of experience working directly with individuals with behavioral health conditions (if serving members with behavioral health needs) or with I/DD or TBI (if serving members with I/DD or TBI needs).
  - For care managers serving members with LTSS needs: two years of prior LTSS and/or HCBS coordination, care delivery monitoring, and care management experience, in addition to the requirements cited above.
- **Supervising care managers serving members with behavioral health conditions must have the following minimum qualifications:**
  - A master's-level fully Licensed Clinical Social Worker (LCSW), fully Licensed Professional Counselor (LPC), fully Licensed Psychological Associate (LPA), or a registered nurse with a Bachelor of Science in Nursing (BSN); and

- Three years of supervisory experience working directly with the population being served.
- **Supervising care managers serving members with I/DD or TBI must have one of the following minimum qualifications:**
  - A bachelor's degree in a human services field (including nursing) and five years of supervisory experience working directly with complex individuals with I/DD or TBI; or
  - A master's degree in a human services field (including nursing), with three years of supervisory experience working directly with complex individuals with I/DD or TBI.

The organization must ensure that each care manager is supervised by a supervising care manager. One supervising care manager must not oversee more than eight care managers. Supervisors should have no caseload but will provide coverage for vacation, sick leave and staff turnovers. They will be responsible for approving all Tailored Care Management care plans and Individual Support Plans (ISPs) and will provide guidance to care managers on how to meet members' needs.

**3.2. Clinical consultants.** The BH I/DD Tailored Plan will be required to ensure that organizations providing Tailored Care Management (AMH+ practices, CMAs or the BH I/DD Tailored Plan itself) have access to clinical consultants in order to access expert support appropriate for the needs of the panel under Tailored Care Management. Clinical consultants are not part of the care team for any given member; rather, the role of clinical consultants is to provide subject matter expert advice to the care team. The consultants must be contracted by the AMH+, CMA, or CIN and should be available by phone to staff within AMH+ practices and CMAs to advise on complex clinical issues on an ad hoc basis. While different member needs will require different expertise, the AMH+ or CMA must ensure that it has access to at least the following experts:

- An adult psychiatrist or child and adolescent psychiatrist;
- A neuropsychologist or psychologist; and
- For CMAs, a primary care physician to the extent the beneficiary's PCP is not available for consultation.

AMH+ practices and CMAs may demonstrate that they have access to clinical consultants themselves, or can contract with other provider organizations to arrange access. The PMPM rate for Tailored Care Management will take these costs into consideration.

#### ***4) Delivery of Tailored Care Management***

**4.1. Policies and procedures for communication with members.** The AMH+ or CMA must develop policies (to be approved by the BH I/DD Tailored Plan) for communicating and sharing information with individuals and their families and other caregivers with appropriate consideration for language, literacy, and cultural preferences, including sign language, closed

captioning, and/or video capture. “Robocalls” or automated telephone calls that deliver recorded messages will not be an acceptable form of contact.

**4.2. Capacity to engage with members through frequent contact.** The Department is setting minimum requirements for contact between members and care managers under the Tailored Care Management model. While the Department is not setting specific minimum staffing ratios to allow flexibility for providers to customize care teams according to needs, it is the responsibility of the AMH+ or CMA to have adequate staffing in place to meet the Department’s requirements for engagement. For each member, the level of minimum contacts will be defined by the same “low,” “moderate,” and “high” acuity tiers that will be used to adjust payments. The Department intends to establish a standardized methodology to assign each BH I/DD Tailored Plan member to an acuity tier and will release additional detail on the methodology prior to BH I/DD Tailored Plan launch. The minimum contact requirements below will apply to each member unless he/she expresses preference for fewer contacts and this preference is documented in the care plan or ISP and reviewed with the supervising care manager, or if the member is enrolled in the Innovations waiver, then the minimum contract requirements will be determined by acuity level or waiver requirements, whichever is higher (see IV. 1. Summary of Tailored Care Management Model).

The minimum contact requirements will be as follows:

- **Care manager contacts for members with behavioral health needs:**
  - **High Acuity:** At least four (4) care manager-to-member contacts per month, including at least one (1) in-person contact with the member.
  - **Moderate Acuity:** At least three (3) care manager-to-member contacts per month and at least one (1) in-person contact with the member quarterly (includes care management comprehensive assessment if it was conducted in-person).
  - **Low Acuity:** At least two (2) care manager-to-member contacts per month and at least two (2) in-person contacts member contacts per year, approximately six (6) months apart (includes care management comprehensive assessment if it was conducted in-person).
  
- **Care manager contacts for members with an I/DD or TBI:**
  - **High Acuity:** At least three (3) care manager-to-member contacts per month, including two (2) in-person contacts and one (1) telephonic contact with the member.
  - **Moderate Acuity:** At least three (3) care manager-to-member contacts per month and at least one (1) in-person contact with the member quarterly.
  - **Low Acuity:** At least one (1) telephonic contact per month and at least two (2) in-person care manager-to-member contacts per year, approximately six (6) months apart.

**4.3. Care management comprehensive assessment.**<sup>29</sup> The care management comprehensive assessment will be a person-centered assessment of a member’s health care needs, functional needs, accessibility needs, strengths and supports, goals, and other characteristics that will inform the ongoing care plan, or ISP, and treatment. The Department is requiring that all BH I/DD Tailored Plan members entering Tailored Care Management receive the care management comprehensive assessment, completed by the organization performing the Tailored Care Management, to determine care needs. The care management comprehensive assessment will help to consolidate information across physical health, behavioral health, I/DD, TBI, LTSS, pharmacy, unmet health-related resource needs, and other needs and inform the care plan or ISP.

The AMH+ or CMA will be expected to make a best effort attempt to complete the care management comprehensive assessment in person, in a location that meets the member’s needs. “Best effort” will be defined as including at least three documented follow-up attempts to contact the member if the first attempt is unsuccessful. The Department recognizes that in limited circumstances it will be necessary to complete the assessment via technology conferencing tools (e.g., audio, video, and/or web). During the first year of BH I/DD Tailored Plan operation (July 2021-June 2022), the AMH+ or CMA must undertake best efforts to **complete** the care management comprehensive assessment within the following timeframes:

- Members identified as high acuity: within 60 days of BH I/DD Tailored Plan enrollment.<sup>30</sup>
- Members identified as moderate/low acuity: within 90 days of BH I/DD Tailored Plan enrollment.

During the second and subsequent years of BH I/DD Tailored Plan operation, the AMH+ or CMA must undertake best efforts to complete the care management comprehensive assessment within 60 days of BH I/DD Tailored Plan enrollment for all members.

**Required Components of Care Management Comprehensive Assessment:** The AMH+ or CMA will be required to ensure that the care management comprehensive assessment includes, at a minimum, the following domains:<sup>31</sup>

- Immediate care needs;
- Current services and providers across all health needs;
- Functional needs, accessibility needs, strengths, and goals;
- Other state or local services currently used;
- Physical health conditions, including dental conditions;

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<sup>29</sup> The care management comprehensive assessment is distinct from the comprehensive clinical assessment (CCA) and does not serve as a means to approve services.

<sup>30</sup> Within 45 days of BH I/DD Tailored Plan enrollment is best practice.

<sup>31</sup> Assessment practices and requirements must also be informed by and coordinated with federally required MDS 3.0 and OASIS assessments performed by nursing facilities and home health agencies, as appropriate.

- Current and past mental health and substance use status and/or disorders, including tobacco use disorders;
- Physical, intellectual, or developmental disabilities;
- Detailed medication history— a list of all medicines, including over the counter medication and medication that has been prescribed, dispensed, or administered;
- Advanced directives, including psychiatric advanced directives;
- Available informal, caregiver, or social supports;
- Standardized unmet health-related resource need questions (to be provided by the Department) covering four priority domains:
  - Housing instability;
  - Transportation insecurity;
  - Food insecurity; and
  - Interpersonal safety.
- Any other ongoing conditions that require a course of treatment or regular care monitoring;
- For adults only, exposure to adverse childhood experiences (ACEs) or other trauma
- Risks to the health, well-being, and safety of the member and others (including sexual activity and potential abuse/exploitation, or exposure to second hand smoke and other substances);
- Cultural considerations (ethnicity, religion, language, reading level, health literacy, etc.);
- Employment/community involvement;
- Education (including individualized education plan and lifelong learning activities);
- Justice system involvement;
- Risk factors that indicate an imminent need for LTSS;
- Caregiver’s strengths and needs;
- Self-management and planning skills;
- Receipt of and eligibility for entitlement benefits; and
- For members with I/DD or TBI:<sup>32</sup>
  - Upcoming life transitions (changing schools, employment, moving, etc.);
  - Financial resources and money management;
  - Alternative guardianship arrangements, as appropriate;
- For children ages zero up to age three, incorporate questions related to Early Intervention (EI) services for children, including:
  - Whether the child is receiving EI services;

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<sup>32</sup> For Innovations waiver enrollees, BH I/DD Tailored Plans will be required to ensure that results of the Supports Intensity Scale (SIS) are shared with the beneficiary’s care manager in an electronic format to aid completion of the care management comprehensive assessment.

- Child's current EI services;
  - Frequency of EI services provided;
  - Which local Children's Developmental Service Agency (CDSA) or subcontracted agency is providing the services; and
  - Contact information for the CDSA service coordinator; and
- For children ages three up to age 21 with a mental health disorder and/or SUD, including members with a dual I/DD and mental health diagnosis, incorporate a strengths assessment process that promotes the identification of the functional strengths of each youth, family, and community.

**Requirements for Reassessment:** The AMH+ or CMA must attempt a care management comprehensive assessment for members already engaged in care management:

- At least annually;
- When the member's circumstances, needs, or health status changes significantly;
- After significant changes in scores on State-approved level-of-care determination and screening tools (e.g., Level of Care Utilization System (LOCUS) and Child and Adolescent LOCUS, American Society of Addiction Medicine (ASAM), Child and Adolescents Needs and Strengths (CANS), SIS);
- After "triggering events" as defined below; or
- At the member's request.

"Triggering events" prompting reassessments include:

- Inpatient hospitalization for any reason;
- Two emergency department (ED) visits since the last care management comprehensive assessment (including reassessment);
- An involuntary treatment episode;
- Use of behavioral health crisis services;
- Arrest or other involvement with law enforcement/the criminal justice system, including Division of Juvenile Justice;
- Becoming pregnant and/or giving birth;
- A change in member circumstances that requires an increased need for care, a decreased need for care, transition into or out of an institution, or loss of a family/friend caretaker, or any other circumstance the plan deems to be a change in circumstance; and
- Loss of housing.

The AMH+ or CMA must ensure that the member receives a reassessment within 30 days of when it detects the triggering change or event. For triggering events and in other circumstances in which an assessment may have been recently performed, reassessment may consist of an addendum or update to a previous assessment.

Sharing of Care Management Comprehensive Assessment Results: **The AMH+ or CMA must ensure that the results of the care management comprehensive assessment are shared with the member's primary care, behavioral health, I/DD, TBI, and LTSS providers, and the BH I/DD Tailored Plan within 14 days of completion to inform care planning and treatment planning, with the member's consent (to the extent required by law).**

**4.4. Care plans and Individual Support Plans (ISPs).** The AMH+ or CMA must develop a care plan for each member with behavioral health needs and/or an ISP for each member with I/DD and TBI needs. Each care plan and ISP must be individualized and person-centered and developed using a collaborative approach including member and family participation where appropriate. Care plans and ISPs must incorporate the results of the care management comprehensive assessment (including unmet health-related resource need questions), claims analysis and risk scoring, any available medical records, and screening and/or level of care determination tools, including the following, as appropriate, unless modified by the Department:

- LOCUS and CALOCUS;
- CANS;
- ASAM criteria; and
- For Innovations waiver enrollees: SIS.

For BH I/DD Tailored Plan members ages three (3) to twenty-one (21) with mental health and/or SUD disorders, the AMH+ or CMA must follow System of Care requirements, including:

- Involving a Child and Family Team (CFT) in facilitating the care planning process and developing the care plan or ISP;
- Using the strengths assessment to build strategies included in the care plan or ISP that address the critical needs and unique strengths of the youth and family as identified by and in cooperation with the CFT;
- Regularly updating the care plan or ISP to respond to changes with the youth and family, as well as the results of the supports and services provided, and document the shift of activity from formal supports to informal supports for greater self-sufficiency.

**Required Content of Care Plan or ISP:** AMH+ practices and CMAs will be required to ensure that all care plans and ISPs developed under Tailored Care Management include the following minimum elements:

- Names and contact information of key providers, care team members, family members, and others chosen by the member to be involved in planning and service delivery;
- Measurable goals;
- Clinical needs, including any behavioral health, I/DD-related, TBI-related, or dental needs<sup>33</sup>;

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<sup>33</sup> Inclusive of tobacco use.

- Interventions including addressing medication monitoring, including adherence;
- Intended outcomes;
- Social, educational, and other services needed by the member;
- Strategies to increase social interaction, employment, and community integration;
- Emergency/natural disaster/crisis plan;
- Strategies to mitigate risks to health, well-being, and safety of the members and others;
- Information about advance directives, including psychiatric advance directives, as appropriate;
- Strategies to improve self-management and planning skills;
- For members with I/DD or TBI, the ISP should also include:
  - Life transitions plan to address instances where the member is changing schools, changing employment, moving, or entering another life transition; and
  - Caregiver supports, including connection to respite services, as necessary.

**Timing of Care Plan:** The AMH+ or CMA must make best efforts to complete an initial care plan or ISP within 30 days of the completion of the care management comprehensive assessment. “Best effort” is defined as including at least three documented follow-up attempts to contact the member if the first attempt is unsuccessful.<sup>34</sup> The AMH+ or CMA must ensure that development of the care plan or ISP does not delay the provision of needed services to a member in a timely manner, even if that member is waiting for a care plan or ISP to be developed.

**Updates to Care Plan or ISP:** The AMH+ or CMA will be required to ensure that each care plan or ISP is regularly, comprehensively updated, incorporating input from the member and members of the care team, as part of ongoing care management:

- At minimum every 12 months;
- When the member’s circumstances or needs change significantly;
- At the member’s request;
- Within 30 days of care management comprehensive (re)assessment; and/or
- After triggering events (see above).

**Documentation and Storage of Care Plan or ISP:** The AMH+ or CMA will be required to ensure that each care plan or ISP is documented, stored, and made available to the member and the following representatives within 14 days of completion of the care plan or ISP:

- Care team members, including the member’s PCP, behavioral health, I/DD, TBI, and LTSS providers;

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<sup>34</sup> For Innovations/TBI waiver enrollees, ISPs developed prior to BH I/DD Tailored Plan launch will continue to serve as the ISP under Tailored Care Management in Year 1 of BH I/DD Tailored Plan operation. For members who may obtain a waiver slot after BH I/DD Tailored Plan launch, requirements will be laid out in the BH I/DD Tailored Plan RFA.

- Other providers delivering care to the member;
- The member's legal representative (as appropriate);
- The member's caregiver (as appropriate, with consent);
- Social service providers (as appropriate, with consent); and
- Other individuals identified and authorized by the member.

**4.5. Care teams.** The AMH+ or CMA must establish a multidisciplinary care team for each member under Tailored Care Management. Depending on the member's needs, the required members of a multidisciplinary care team will include the member, the member's care manager and the following individuals, depending on the member's needs:

- Caretaker(s)/legal guardians;
- Supervising care manager;
- Primary care provider;
- Behavioral health provider(s);
- I/DD and/or TBI providers, as applicable;
- Other specialists;
- Nutritionists;
- Pharmacists and pharmacy techs;
- The member's obstetrician/gynecologist (for pregnant women);
- Peer support specialist employed by the AMH+, CMA, or CIN, as applicable<sup>35</sup>; and
- Other providers and individuals, as determined by the care manager and member.

The AMH+ or CMA does not necessarily need to have all the care team members on staff or embedded in the practice – providers of various specialties may virtually participate in care teams from other settings. **However, the AMH+ or CMA must establish a plan to activate relationships with primary care providers and other key interdisciplinary agencies/providers.**

The AMH+ or CMA must have written policies and procedures to ensure that multidisciplinary care team formation and communication occur in a timely manner and that the care team is documented in the care plan and is regularly updated. To implement such policies, the AMH+ or CMA will be required to conduct regular case conferences with members of the multidisciplinary care team, as appropriate based on member needs.

Since regular, on-the-ground communication across settings is essential to the success of the model, the Department will require all organizations performing care management to have information technology and policies and procedures in place that support communication and information sharing. If it does not already have the capacity to do so, the AMH+ or CMA must demonstrate that it will have the ability to electronically and securely transmit the care plan to each member of the multidisciplinary care team, by BH I/DD Tailored Plan launch (see also Section V. 5. Health IT).

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<sup>35</sup> Peer support specialists are recommended for members with behavioral health needs, but are not required.

**4.6. Required components of Tailored Care Management.** Once care management has been initiated through the completion of the comprehensive care management assessment and formation of the care team, the AMH+ or CMA will be responsible for ensuring that care management is carried out according to the care plan or ISP. The AMH+ or CMA will be required to ensure that all of the following components of Tailored Care Management are available to enrolled members:

- **Care Coordination:** The AMH+ or CMA must coordinate the member's health care and social services, spanning physical health, behavioral health, I/DD, TBI, and LTSS services, pharmacy, and services to address unmet health-related resource needs (see section 4.7 below). Care coordination includes following up on referrals and working with the member's providers to help coordinate resources during any crisis event as well as providing assistance in scheduling and preparing members for appointments (e.g., reminders and arranging transportation). Care coordination also includes provision of referral, information, and assistance in obtaining and maintaining community-based resources and social support services, including Long-term services and supports; I/DD and TBI services (including Innovations and TBI waiver services); and any State-funded services.
- **Twenty-four-hour Coverage:** AMH+ practices and CMAs must provide or arrange for coverage for services, consultation or referral, and treatment for emergency medical conditions, including behavioral health crisis, 24 hours per day, seven days per week. This requirement includes the ability to (1) share information such as care plans and psychiatric advance directives, and (2) coordinate care to place the member in the appropriate setting during urgent and emergent events. Automatic referral to the hospital ED for services does not satisfy this requirement.
- **Annual Physical Exam:** The AMH+ or CMA must ensure that the member has an annual physical exam, or well-child visit based on the appropriate age-related frequency.
- **Continuous Monitoring:** The AMH+ or CMA must conduct continuous monitoring of progress toward goals identified in the care plan or ISP through face-to-face and collateral contacts with the member and his/her support member(s) and routine care team reviews. The AMH+ or CMA must support the member's adherence to prescribed treatment regimens and wellness activities.
- **Medication Monitoring:** The AMH+ or CMA must conduct medication monitoring, including regular medication reconciliation (conducted by appropriate care team member) and support of medication adherence.

- **System of Care:** The AMH+ or CMA must utilize strategies consistent with a “System of Care”<sup>36</sup> philosophy for children and youth, including knowledge of child welfare, school, and juvenile justice systems. For children and youth receiving behavioral health services, care management must include:
  - Promotion of family-driven, youth-guided service delivery and development of strategies built on social networks and natural or informal supports;
  - Development of, with families and youth, strategies that maximize the skills and competencies of family members to support youth and caregivers’ self-determination and enhance self-sufficiency;
  - Verifiable efforts for services and supports to be delivered in the community within which the youth and family live, using the least restrictive settings possible to preserve community and family connections and manage costs; and
  - Development and implementation of proactive and reactive crisis plans in conjunction with the care plan/ISP that anticipate crises and utilize family, team and community strengths to identify and describe who does what and when; every member of the CFT shall be provided a copy of the plan.
  
- **Individual and Family Supports:** The AMH+ or CMA must ensure that the care management approach incorporates individual and family supports including:
  - Educating the member in self-management;
  - Providing education and guidance on self-advocacy to the member, family members, and support members;
  - Connecting the member and caregivers to education and training to help the member improve function, develop socialization and adaptive skills, and navigate the service system;
  - Providing information and connections to needed services and supports including but not limited to self-help services, peer support services, and respite services;
  - Providing information to the member, family members, and support members about the member’s rights, protections, and responsibilities, including the right to change providers, the grievance and complaint resolution process, and fair hearing processes;
  - Promoting wellness and prevention programs;
  - Providing information on establishing advance directives, including psychiatric advance directives as appropriate, and guardianship options/alternatives, as

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<sup>36</sup> The North Carolina System of Care is the framework through which the state delivers public behavioral health services to children and youth. The core System of Care’s elements are: (1) family-driven, youth-guided services; (2) interagency collaboration; (3) service coordination through a single facilitator; (4) individualized, strength-based, trauma-informed/resilience development approach; (5) culturally and linguistically competent care; (6) evidence-based or informed services provided in a home or community setting; and (7) family and youth involvement in regional and state policy development, implementation, and evaluation. For more information on the “system of care” approach, visit: <https://nccollaborative.org/what-is-system-of-care/>

- appropriate;
  - Connecting members and family members to resources that support maintaining employment, community integration, and success in school, as appropriate;
  - For high-risk pregnant women, inquiring about broader family needs and offering guidance on family planning; and
  - For high-risk pregnant women, beginning discussions about the potential for an Infant Plan of Safe Care.
- **Health Promotion:** The AMH+ or CMA must address the following items for health promotion:
    - Physical comorbidities of BH I/DD Tailored Plan populations;
    - Key issues and interventions for metabolic disorders (e.g., diabetes and heart disease);
    - Self-management and self-help recovery resources (including substance use recovery);
    - Roles and responsibilities for medication management; and
    - Use of IT in care management comprehensive assessments, care planning, and ongoing care coordination and management, including the use of NCCARE360.

**4.7. Addressing unmet health-related resource needs.** The AMH+ or CMA must ensure that Tailored Care Management addresses unmet health-related resource needs by performing the following activities at a minimum:

Provide referral, information, and assistance in obtaining and maintaining community-based resources and social support services, including:

- Disability benefits;
- Food and income supports;
- Housing;
- Transportation;
- Employment services;
- Education;
- Financial literacy programs;
- Child welfare services;
- After-school programs;
- Rehabilitative services;
- Domestic violence services;
- Legal services;
- Services for justice-involved populations; and
- Other services that help individuals achieve their highest level of function and independence.

The AMH+ or CMA must provide comprehensive assistance securing health-related services, including assistance at initial application and renewal with filling out and submitting applications, and gathering and submitting required documentation, including in-person assistance when it is the most efficient and effective approach, at a minimum, to:

- Food and Nutrition Services;
- Temporary Assistance for Needy Families;
- Child Care Subsidy;
- Low Income Energy Assistance Program;
- ABLEnow Accounts (for individuals with disabilities);
- Women, Infants, and Children (WIC) Program; and
- Other programs managed by the BH I/DD Tailored Plan that address unmet health-related resource needs.

The AMH+ or CMA must provide referral, information, and assistance in connecting members to programs and resources that can assist in:

- Securing employment;
- Supported employment (such as through the Individual Placement and Support - Supported Employment (IPS-SE) program);
- Volunteer opportunities;
- Vocational rehabilitation and training; or
- Other types of productive activity that support community integration, as appropriate.

**4.8. Transitional care management.** AMH+ practices and CMAs must manage transitions of care for members under care management, through best efforts to conduct all of the following activities:<sup>37</sup>

- Ensure that a care manager is assigned to manage the transition;
- Have a care manager or care team member visit the member during his/her stay in the institution and be present on the day of discharge;
- Conduct outreach to the member's providers;
- Obtain a copy of the discharge plan and review the discharge plan with the member and facility staff;
- Facilitate clinical handoffs;
- Assist the member in obtaining needed medications prior to discharge, ensure an appropriate care team member conducts medication reconciliation/management, and support medication adherence;

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<sup>37</sup> For individuals with I/DD or TBI, the elements of transitional care management should also take place in the following "life transitions": (i) a member is transitioning out of school-related services ; (ii) a member experiences life changes such as employment, retirement, other life events; (iii) a member has experienced the loss of or change in primary caregiver; or (iv) a member is transitioning out of foster care.

- Prior to discharge from residential or inpatient settings, in consultation with the member, facility staff, and the member's care team, create and implement a 90-day transition plan as an amendment to the member's care plan or ISP that outlines how the member will maintain or access needed services and supports, transition to the new care setting, and integrate into his/her community. The 90-day transition plan must incorporate any needs for training of parents and other adults to care for a child with complex medical needs post-discharge from an inpatient setting. Development of a 90-day transition plan is not required for all ED visits, but may be developed according to the care manager's discretion;
- Communicate and provide education to the member and the member's caregivers and providers to promote understanding of the 90-day transition plan;
- Facilitate arrangements for and scheduling of transportation, in-home services, and follow-up outpatient visits with appropriate providers within a maximum of seven calendar days, unless required within a shorter time frame;
- As feasible prior to transition, assess settings that the member is transitioning to for safety and appropriateness for the member, using the checklist developed by the BH I/DD Tailored Plan, and communicate to the BH I/DD Tailored Plan any risks that are found;
- Ensure that the assigned care manager follows up with the member within 48 hours of discharge;
- Arrange to visit the member in the new care setting after discharge/transition;
- Conduct a care management comprehensive assessment within 30 days of the discharge/transition, or update the current assessment; and
- Update the member's care plan or ISP in coordination with the care team within 90 days of the discharge/transition.

For members who are transitioning out of adult care homes, AMH+ and CMAs will also be responsible for transition-related responsibilities, including:<sup>38</sup>

- Assuming primary responsibility for ongoing planning for effective and timely transition and continuity of care;
- Collaborating with the adult care home providers, discharge planners, the member and/or their family or guardian, the community-based primary care provider once selected, and other community providers as appropriate in the transition planning process, by participating in all transition meetings, either by phone or in person, to ensure effective and timely discharge and transition to community;
- Collaborating with the member and/or their family members or guardians, peer support specialists when available, facility providers, and the BH I/DD Tailored Plan's housing specialist to make arrangements for individualized supports and services needed to be in place upon discharge;

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<sup>38</sup> BH I/DD Tailored Plan employees will be responsible for transition-related activities for members transitioning out of state psychiatric hospitals, state developmental centers, and other ICF-IIDs. The Department will release additional guidance on these requirements as part of the RFA.

- Collaborating with the member and/or their family members or guardians, the facility provider, and selected community provider(s) prior to the member's discharge to identify and prioritize the most critical services necessary to address the member's specific needs, including complex behavioral health, primary care and medical needs; and
- Addressing any identified barriers to discharge planning to the least restrictive and most integrated setting possible including but not limited to, network adequacy issues, transportation, housing, assessment, resource identification, and referrals to qualified providers prior to the member's discharge.

**4.9. Diversion.** AMH+ practices and CMAs must assume primary responsibility for identifying members who are at risk of requiring care in an adult care home or an institutional setting, such as an ICF-IID, psychiatric hospital, or psychiatric residential treatment facility, and performing diversion activities. Diversion activities must include:

- Screening and assessing the member for eligibility for community-based services;
- Educating the member on the choice to remain in the community and the services that would be available;
- Facilitating referrals and linkages to community support services for assistance;
- Determining if the member is eligible for supported housing, if needed; and
- Developing a Community Integration Plan that clearly documents that the member's decision to remain in the community was based on informed choice, and the degree to which the member's decision has been implemented.

### **5) Health IT**

Population health management means caring for the whole population an organization is serving, not just individuals actively seeking care.<sup>39</sup> AMH+ practices and CMAs will be expected to take responsibility for the health outcomes of their Tailored Care Management assigned populations, through the delivery of Tailored Care Management that is underpinned and driven by the use of data – both data that is generated internally to their organization and data that originates externally.

**The certification requirements below align with Standard Plan Tier 3 AMH requirements to the greatest extent possible.** The Department recognizes that the requirements will represent a significant change for many BH, I/DD, and TBI providers in particular. Therefore, the Department will allow a range of options for AMH+ practices and CMAs to meet the requirements. Some AMH+ practices and CMAs will choose to meet health IT criteria by partnering with a CIN or Other Partner. The AMH+ or CMA may choose to use the BH I/DD Tailored Plan's care management documentation system as an alternative to building or

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<sup>39</sup> E.g., SAMHSA, September 2014: [https://www.integration.samhsa.gov/integrated-care-models/14\\_Population\\_Management\\_v3.pdf](https://www.integration.samhsa.gov/integrated-care-models/14_Population_Management_v3.pdf).

maintaining its own or working with a CIN or Other Partner. As part of the certification application, organizations are asked to indicate how they plan to build these functions between today and BH I/DD Tailored Plan go-live.

Health IT requirements that each AMH+ or CMA **must** meet in full prior to BH I/DD Tailored Plan go-live are detailed in the Tailored Care Management data strategy policy paper and summarized below:

- 1. Use an Electronic Health Record (EHR):** The AMH+ or CMA must have implemented an EHR that is in use by the AMH+ practice's or CMA's providers to record, store, and transmit member clinical information, including medication adherence.
- 2. Use care management data system:** The AMH+ or CMA must use a care management data system, whether or not integrated within the EHR, that can:
  - Maintain up-to-date documentation of Tailored Care Management member lists and assignments of individual members to care managers;
  - Electronically document and store the care management comprehensive assessment and re-assessment;
  - Electronically document and store the care plan or ISP;
  - Incorporate claims and encounter data;
  - Provide role-based access to each member of the multidisciplinary care team;
  - Electronically and securely transmit (at minimum) the care management; comprehensive assessment, care plan or ISP and reports/summaries of care to each member of the multidisciplinary care team;
  - Track care management encounters electronically, including date and time of each encounter, personnel involved and whether the encounter was in person or telephonic; and
  - Track referrals.
- 3. Use ADT information:** The AMH+ or CMA must access admission, discharge, transfer (ADT) data that correctly identifies when members are admitted, discharged, or transferred to/from an emergency department or hospital in real time or near-real time (see Section V. 4.8. Transitional Care Management). The AMH+ or CMA must implement a systematic, clinically appropriate process with designated staffing for responding to certain high-risk ADT alerts, including:
  - Real-time (within minutes/hours) response to notifications of ED visits, for example by contacting the ED to arrange rapid follow-up;
  - Same-day or next-day outreach for designated high-risk subsets of the population; and
  - Additional outreach within several days after the alert to address outpatient needs or prevent future problems for other patients who have been discharged from a hospital or ED (e.g., to assist with scheduling appropriate follow-up visits or medication reconciliations post-discharge).

4. Use “NCCARE360” once certified as fully deployed to identify community-based resources and connect members to such resources.<sup>40</sup> AMH+ practices and CMAs must:
  - Use NCCARE360 once certified as fully deployed as their community-based organization and social service agency resource repository to identify local community-based resources;
  - Refer members to the community-based organizations and social service agencies available on NCCARE360; and
  - Track closed-loop referrals.
  
5. **(Encouraged, and required from Year Three of BH I/DD Tailored Plans onwards) risk stratify the population under Tailored Care Management beyond acuity tiering:** The Department expects that the standardized acuity tiering methodology described above will be the primary method that BH I/DD Tailored Plans, CMAs and AMH+ practices use to segment and manage their populations under Tailored Care Management in the initial two years of the model. BH I/DD Tailored Plans will have the option of establishing their own risk stratification methodologies beyond acuity tiering; if they do so, they will be required to share all risk stratification results and methodologies used with AMH+ practices and CMAs. As the Tailored Care Management model matures, AMH+ practices and CMAs will be expected to develop their own risk stratification approach, refining the data and risk stratification scores they receive from BH I/DD Tailored Plans to incorporate critical clinical, unmet health-related resource, and other data to which they have access. The Department will require risk stratification at the AMH+ or CMA level from year three of the model onwards. Additionally, patient registries to track patients by condition type/cohort are encouraged, but not required.

## **6) Quality Measurement and Improvement**

After launch of BH I/DD Tailored Plans, AMH+ practices and CMAs will be required to gather, process, and share data with BH I/DD Tailored Plans for the purpose of quality measurement and reporting. The Department will publish quality measure requirements each year. Elements of the list may be modified on an as-needed basis, but new measures will be added only during annual updates. The Department is in the process of finalizing quality requirements, including the collection instruments to be used. AMH+ practices and CMAs may be required to perform tasks including abstracting data from patient charts; performing quality assurance to validate the accuracy of data in patient charts that is used for quality measurement purposes; using additional codes to fully document patient status and needs in order to improve the accuracy of quality measurement; and explaining to patients the purpose of certain state-sponsored surveys, how the state and health plans will use survey results, and how their information will

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<sup>40</sup> The Department intends to work with BH I/DD Tailored Plans on their use of NCCARE360 by facilitating regular meetings with BH I/DD Tailored Plans during the implementation, onboarding, and training process to discuss progress, challenges, and best practices. More information on NCCARE360 for providers will be forthcoming.

be kept confidential. AMH+ practices and CMAs may be required to administer brief surveys to capture patient-reported outcomes such as quality of life. AMH+ practices and CMAs may also be required to participate in activities related to the development of new quality measures or survey instruments, such as supporting recruitment of enrollees to participate in focus groups piloting survey questions, or sharing feedback on the staff time and resources required to administer a pilot instrument. The NC-TOPPS survey will remain in place for eligible members with mental health and SUD diagnoses, and it will be the responsibility of the care manager to ensure that information is correctly entered, whether it is administered by the care manager or by a provider agency.

The AMH+ and CMA must use its internal data to drive improvement using a systematic process. At least annually, the AMH+ or CMA must evaluate the Tailored Care Management services it provides to ensure that the services are meeting the needs of empaneled members, and refine the services as necessary. The AMH+ or CMA should use a combination of clinical data, care management encounter data and quality scores to generate a set of internal targets and set) annual goals for improvement.

## **7) Training**

All care managers and supervisors conducting Tailored Care Management will be required to undergo an intensive training curriculum, regardless of previous experience. Each BH I/DD Tailored Plan will design and implement a training plan, using Department guidelines on the topics that must be covered. AMH+ practices and CMAs must ensure that all care managers and supervisors undergo the required training. At this time, the Department is considering the following required domains for training, in addition to any training requirements specified in N.C. General Statute § 122c-115.4:<sup>41</sup>

- BH I/DD Tailored Plan eligibility and services
  - BH I/DD Tailored Plan eligibility criteria, services available only through BH I/DD Tailored Plans, and differences between Standard Plan and BH I/DD Tailored Plan benefit package;
  - Principles of integrated and coordinated physical and behavioral health care and I/DD and TBI services;
  - Behavioral health crisis response; and
  - Knowledge of 1915(c) Innovations and TBI waiver eligibility criteria.
- Whole-person health and unmet resource needs
  - Understanding and addressing adverse childhood events (ACEs), trauma, and trauma-informed care;
  - Understanding and addressing unmet health-related resource needs, including

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<sup>41</sup> Final details will be published in the BH I/DD Tailored Plan RFA.

- identifying, utilizing, and helping the Member navigate available social supports and resources at the Member's local level; and
- Cultural competency, including LTSS needs, cultural sensitivity considerations for tribal populations and forms of bias that may affect BH I/DD Tailored Plan Members.
- Community integration
    - Independent living skills;
    - Skills to conduct diversion from adult care homes and other congregate settings, institutional settings, and correctional facilities;
    - Knowledge of supportive housing; and
    - Available programs and resources to assist Members in securing employment, supported employment, apprenticeships, volunteer opportunities, vocational rehabilitation and training, or other types of productive activities that support community integration.
  - Components of Health Home Care Management
    - Health Home Overview: What is a Health Home? Whom does it serve? What is care management? How do Members and their families participate in care planning?; and
    - Working effectively with a multidisciplinary care team, scheduling team meetings, planning agendas and facilitating meetings.
  - Health promotion
    - Common physical comorbidities of BH I/DD Tailored Plan populations;
    - Key issues and interventions for metabolic disorders (e.g., diabetes and heart disease);
    - Self-management and self-help recovery resources (including substance use recovery);
    - Roles and responsibilities for medication management; and
    - Use of IT in care management comprehensive assessments, care planning, and ongoing care coordination and management, including the use of NCCARE360.
  - Other care management skills
    - Transitional care management best practices;
    - Supporting health behavior change, including motivational interviewing;
    - Person-centered needs assessment and care planning, including LTSS needs;
    - Preparing Members for and assisting them during emergencies and natural disasters
    - Understanding needs of the justice-involved population; and
    - Understanding and navigating the Medicare program, including preparation for Medicare eligibility and enrollment and other programs that serve dually eligible Members, such as PACE

- Additional trainings for care managers and supervisors serving members with I/DD or TBI
  - Understanding various I/DD and TBI diagnoses and their impact on the individual’s functional abilities, physical health and behavioral health (i.e., co-occurring mental health diagnosis), as well as their impact on the individual’s family/caregivers;
  - Understanding HCBS, related planning, and 1915(c) services and requirements;
  - Accessing and using assistive technologies to support individuals with I/DD and TBI;
  - Understanding the changing needs of individuals with I/DD and TBI as they age, including when individuals age out of school-related services; and
  - Educating Members with I/DD and TBI about consenting to physical contact and sex.
- Additional trainings for care managers and supervisors serving children
  - Child- and family-centered teams;
  - Understanding of the “System of Care” approach, including knowledge of child welfare, school, and juvenile justice systems; and
  - Methods for effectively coordinating with school-related programming and transition-planning activities.
- Additional trainings for care managers and supervisors serving pregnant and postpartum women with SUD or with SUD history
  - Best practices for addressing the needs of pregnant and postpartum women with SUD or with SUD history, such as general knowledge about pregnancy, medication-assisted treatment, SUD and breastfeeding, and infant opioid withdrawal.
- Additional trainings for care managers and supervisors serving members with LTSS needs.
  - Methods for coordinating with supported employment resources available through the Department, the Division for Vocational Rehabilitation and other general employment resources such as the Employment Securities Commission.

The AMH+ or CMA must ensure that all care managers complete training on all core modules identified by the BH I/DD Tailored Plan before being deployed to serve members; care managers must complete the remaining training modules within 30 days. The AMH+ or CMA must ensure that care managers and supervisors attend annual refresher courses on training topics based on needs determined by care manager supervisors; care managers and supervisors may also request targeted retraining.

### **Section VI: Payment**

The Department is developing requirements governing care management payments to BH I/DD Tailored Plans, as well as downstream payments from BH I/DD Tailored Plans to AMH+ practices

and CMAs. The Department will make monthly payments to BH I/DD Tailored Plans for Tailored Care Management that are based on the number of members engaged in the model and the acuity level of those members. Payments that BH I/DD Tailored Plans will be required to make to AMH+ practices and CMAs will be subject to Department-set PMPM rates. **The rates payable to AMH+ practices and CMAs for Tailored Care Management will be significantly higher than market rates for care management under Standard Plans.** BH I/DD Tailored Plans will be required to make payments for Tailored Care Management only for members that are actively engaged in the model.

The AMH+ practice and CMA will be responsible for billing the BH I/DD Tailored Plan monthly, including demonstration that it has delivered at least one of the Health Home core services in that month and attesting that it has met the minimum contact requirements associated with each member's acuity tier. The BH I/DD Tailored Plan will be responsible for billing the Department for care management payments each month. The Department will reserve the right to audit care plans and other records at any time.

Providers' participation as an AMH+ or CMA will not impact fee-for-service payments for clinical services, nor will it affect payment of Medical Home Fees to primary care practices.<sup>42</sup>

More detail on care management payment rates, including the acuity tiering method, will be forthcoming.

### **Section VII: Oversight Model after BH I/DD Tailored Plan Launch**

The Department will hold BH I/DD Tailored Plans responsible for implementing Tailored Care Management within their regions.

BH I/DD Tailored Plans will be accountable to the Department through the following mechanisms:

- **Contract with the Department:** All required elements of the Tailored Care Management model reflected in this manual will be included in the contract between the Department and each BH I/DD Tailored Plan. BH I/DD Tailored Plans will be responsible for both ensuring that their own staff adhere to the requirements and for overseeing the performance of the model at the AMH+ and CMA level.
- **Reporting requirements:** BH I/DD Tailored Plans will be required to report data to the Department on a periodic basis, with encounter-level information on care management conducted at both the BH I/DD Tailored Plan level and the AMH+, CMA, or CIN level.

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<sup>42</sup>BH I/DD Tailored Plans will be required to pay Medical Home Fees (fixed \$2.50 PMPM or \$5 PMPM for ABD) to all AMH practices in AMH Tiers 2 and 3, as well as \$1 PMPM Medical Home Fees to Tier 1 practices. AMH+ practices will receive Medical Home Fees in the same way as other Tier 3 practices in recognition of their role as PCPs and will receive care management payments in addition under the Tailored Care Management model.

- **Required elements in BH I/DD Tailored Plan, AMH+, and CMA contracting:** BH I/DD Tailored Plans must include all the required elements of Tailored Care Management in their contracts with AMH+ practices and CMAs. Provider contract templates, including all sections and attachments, must be approved by the Department.

In turn, AMH+ practices and CMAs can expect to be held accountable to BH I/DD Tailored Plans. Each BH I/DD Tailored Plan will be required to have a written process documenting how it will identify compliance issues and allow AMH+ practices and CMAs the opportunity to correct them under a Corrective Action Plan (CAP). The process must describe clearly how a CAP may operate at the level of an individual AMH+ or CMA, and/or how a CAP may operate at the level of a CIN or Other Partner, if applicable. The Department will require each CAP process to give a minimum of 30 days to remediate any identified issues, although the parties may establish longer remediation periods by mutual agreement. To promote AMH+ practices and CMAs' ability to make informed choices about CIN or Other Partner affiliations, BH I/DD Tailored Plans will be required to send direct notification of any CAP imposed at the CIN/Other Partner level, to each AMH+ practice or CMA describing the CAP, and to notify the Department in this circumstance. In the event of continued underperformance by an AMH+ practice, CMA, or CIN or Other Partner that is not corrected after the time limit on the CAP, the Department will permit the BH I/DD Tailored Plan to stop making Tailored Care Management payments and terminate its contract with the AMH+ or CMA. The BH I/DD Tailored Plan's policies and procedures must set out the detailed process by which this would occur. The BH I/DD Tailored Plan's policies and procedures must also set out the detail of the options certified AMH+ practices and CMAs will have in the event that a CIN or Other Partner fails to correct continued compliance problems; such options may include contracting directly with the BH I/DD Tailored Plan, or contracting with another CIN or Other Partner.<sup>43</sup>

### **Section VIII: Local Health Department Programs**

Currently, North Carolina provides care management for women experiencing high-risk pregnancies and at-risk children ages 0-5 to five through programs run by local health departments (LHDs). After Managed Care launch, the PMH/OBCM and CC4C programs will be known as Care Management for High-Risk Pregnant Women (CMHRP) and Care Management for At-Risk Children (CMARC), respectively. Through June 2022, Standard Plans are being required to extend to LHDs the "right of first refusal" as contracted providers of CMHRP and CMARC.

There is one year of overlap between the LHD transition period with Standard Plans and the operation of BH I/DD Tailored Plans (July 2021 - June 2022). The Department has developed requirements to ensure that BH I/DD Tailored Plan members participating in these programs receive whole-person care management and do not experience disruption to the continuity of their care.

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<sup>43</sup> AMH+ practices and CMAs will have the right to appeal certification and contracting decisions made by the BH I/DD Tailored Plan in accordance with guidelines to be determined by the Department.

- **CMHRP:** For the first BH I/DD Tailored Plan contract year (July 2021 through June 2022), LHDs will have “right of first refusal” as contracted providers of CMHRP. Women enrolling in BH I/DD Tailored Plans who participate in CMHRP will also be eligible for Tailored Care Management (i.e., a second care manager) to address other needs not included in the LHD model.
- **CMARC:** CMARC and Tailored Care Management provide duplicative services. Thus, children will not participate in both programs at the same time. BH I/DD Tailored Plan eligible children who are already enrolled in CMARC at the time of BH I/DD Tailored Plan launch may remain in CMARC, with BH I/DD Tailored Plans required to continue to contract with the LHD. Otherwise, after the launch of BH I/DD Tailored Plans, children eligible for BH I/DD Tailored Plans will be enrolled into Tailored Care Management and not into CMARC.

It will be the responsibility of the BH I/DD Tailored Plans to ensure that care managers at AMH+ practices and CMAs have the information they need to coordinate effectively with CMHRP care managers and manage transitions into Tailored Care Management, in the case of young children transitioning from CMARC.