

Clarifications on RWHAP Client Eligibility Determinations & Recertification Requirements

A Refresher on PCN 13-02 for RWHAP Recipients

Objectives

By the end of this presentation, recipients will be able to:

- **Explain why RWHAP client eligibility and recertification are necessary**
- **Describe the client eligibility and recertification requirements for recipients as stated in PCN 13-02**
- **Describe different approaches recipients can take to minimize determination burden on clients**
- **Describe the approaches taken by varied recipients to ensure clients are recertified and maintain access to services**

Agenda

- **Purpose and background**
- **Why eligibility and recertification are necessary**
- **PCN 13-02: in plain language**
- **Operationalizing PCN 13-02**
- **Recipient Presentations**
 - Meagan Ellzey, Coastal Family Health Center (Mississippi – Part C)
 - Kira Friedrich (Louisiana – Part B)
 - Frances Lawless (New Orleans – Part A)
 - Todd Grove (Colorado – Part B)

Purpose & Background

Why verify client eligibility every 6 months

Purpose of RWHAP

**RYAN WHITE
HIV/AIDS PROGRAM
MOVING FORWARD
FRAMEWORK**



- Public health approach to provide a comprehensive system of care
- Ensure low-income people living with HIV (PLWH) receive optimal care and treatment

Background

- **Payor of last resort principle**
 - Eligibility
 - Recertification
- **RWHAP legislative eligibility requirement**
 - Diagnosed HIV infection
 - Low-income (recipient defined)
- **Recipient definitions of eligibility**
 - May define requirements more precisely
 - May NOT broaden the statutory requirement

PCN 13-02 in Plain Language

Initial & Annual Client Eligibility

Initial/Annual Client Eligibility

- **HIV status – set by statute**
 - Documentation required
 - HAB does NOT require CD4/viral load for eligibility
- **Income – set by statute/limits set by recipient**
 - Documentation required
- **Residency – set by recipient**
 - Documentation required
- **Insurance Status – set by statute (payor of last resort)**
 - Verification of other coverage required

Recertification

- **HIV status – set by statute**
 - Documentation not necessary
- **Income – set by statute/limits set by recipient**
 - Self-attestation of no change allowed
 - Self-attestation of change allowed
 - Documentation required but can be collected at next visit
- **Residency – set by recipient**
 - Self-attestation of no change allowed
 - Self-attestation of change allowed
 - Documentation required but can be collected at next visit
- **Insurance Status – set by statute (payor of last resort)**
 - Self-attestation of no change allowed
 - Self-attestation of change allowed
 - Documentation required but can be collected at next visit

Self-Attestation

Self-attestation allows flexibility in meeting the needs of clients and in reducing administrative burden on recipients

- **Clients can self-attest by phone or email (not only in person)**
- **Reduces the filing burden (not collecting the same documentation every 6 months)**
- **Recipients can set recertification schedules**
- **Clients do not need to come in separately to recertify**

Sample Client Burden Timeline – How Eligibility & Recertification Impacts PLWH

2016 Fiscal Calendar

Calendarpedia
Your source for calendars

2015			2016								
Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
1 Th	1 Su	1 Tu	1 Fr <small>New Year's Day</small>	1 Mo	1 Tu	1 Tu	1 Su	1 We	1 Mo	1 Tu	1 Th
2 Fr	2 Mo	2 We	2 Sa	2 Tu	2 We	2 Sa	2 Mo	2 Th	2 Sa	2 Tu	2 Fr
3 Sa	3 Tu	3 Th	3 Su	3 We	3 Th	3 Su	3 Tu	3 Fr	3 Su	3 We	3 Sa
4 Su	4 We	4 Fr	4 Mo	4 Th	4 Fr	4 Mo	4 We	4 Sa	4 Mo <small>Independence Day</small>	4 Th	4 Su
5 Mo	5 Th	5 Sa	5 Tu	5 Fr	5 Sa	5 Tu	5 Th	5 Su	5 Tu	5 Fr	5 Mo <small>Labor Day</small>
6 Tu	6 Fr	6 Su	6 We	6 Sa	6 Su	6 We	6 Fr	6 Mo	6 We	6 Sa	6 Tu
7 We	7 Sa	7 Mo	7 Th	7 Su	7 Mo	7 Th	7 Sa	7 Tu	7 Th	7 Su	7 We
8 Th	8 Su	8 Tu	8 Fr	8 Mo	8 Tu	8 Fr	8 Su	8 We	8 Fr	8 Mo	8 Th
9 Fr	9 Mo	9 We	9 Sa	9 Tu	9 We	9 Sa	9 Mo	9 Th	9 Sa	9 Tu	9 Fr
10 Sa	10 Tu	10 Th	10 Su	10 We	10 Th	10 Su	10 Tu	10 Fr	10 Su	10 We	10 Sa
11 Su	11 We <small>Veterans Day</small>	11 Fr	11 Mo	11 Th	11 Fr	11 Mo	11 We	11 Sa	11 Mo	11 Th	11 Su
12 Mo <small>Columbus Day</small>	12 Th	12 Sa	12 Tu	12 Fr	12 Sa	12 Tu	12 Th	12 Su	12 Tu	12 Fr	12 Mo
13 Tu	13 Fr	13 Su	13 We	13 Sa	13 Su	13 We	13 Fr	13 Mo	13 We	13 Sa	13 Tu
14 We	14 Sa	14 Mo	14 Th	14 Su	14 Mo	14 Th	14 Sa	14 Tu	14 Th	14 Su	14 We
15 Th	15 Su	15 Tu	15 Fr	15 Mo <small>Presidents Day</small>	15 Tu	15 Fr	15 Su	15 We	15 Fr	15 Mo	15 Th
16 Fr	16 Mo	16 We	16 Sa	16 Tu	16 We	16 Sa	16 Mo	16 Th	16 Sa	16 Tu	16 Fr
17 Sa	17 Tu	17 Th	17 Su	17 We	17 Th	17 Su	17 Tu	17 Fr	17 Su	17 We	17 Sa
18 Su	18 We	18 Fr	18 Mo <small>Martin L. King Day</small>	18 Th	18 Fr	18 Mo	18 We	18 Sa	18 Mo	18 Th	18 Su
19 Mo	19 Th	19 Sa	19 Tu	19 Fr	19 Sa	19 Tu	19 Th	19 Su	19 Tu	19 Fr	19 Mo
20 Tu	20 Fr	20 Su	20 We	20 Sa	20 Su	20 We	20 Fr	20 Mo	20 We	20 Sa	20 Tu
21 We	21 Sa	21 Mo	21 Th	21 Su	21 Mo	21 Th	21 Sa	21 Tu	21 Th	21 Su	21 We
22 Th	22 Su	22 Tu	22 Fr	22 Mo	22 Tu	22 Fr	22 Su	22 We	22 Fr	22 Mo	22 Th
23 Fr	23 Mo	23 We	23 Sa	23 Tu	23 We	23 Sa	23 Mo	23 Th	23 Sa	23 Tu	23 Fr
24 Sa	24 Tu	24 Th	24 Su	24 We	24 Th	24 Su	24 Tu	24 Fr	24 Su	24 We	24 Sa
25 Su	25 We	25 Fr	25 Mo	25 Th	25 Fr	25 Mo	25 We	25 Sa	25 Mo	25 Th	25 Su
26 Mo	26 Th <small>Thanksgiving Day</small>	26 Sa	26 Tu	26 Fr	26 Sa	26 Tu	26 Th	26 Su	26 Tu	26 Fr	26 Mo
27 Tu	27 Fr	27 Su	27 We	27 Sa	27 Su	27 We	27 Fr	27 Mo	27 We	27 Sa	27 Tu
28 We	28 Sa	28 Mo	28 Th	28 Su	28 Mo	28 Th	28 Sa	28 Tu	28 Th	28 Su	28 We
29 Th	29 Su	29 Tu	29 Fr	29 Mo	29 Tu	29 Fr	29 Su	29 We	29 Fr	29 Mo	29 Th
30 Fr	30 Mo	30 We	30 Sa	30 Tu	30 We	30 Sa	30 Mo	30 Th	30 Sa	30 Tu	30 Fr
31 Sa	31 Tu	31 Th	31 Su		31 Th		31 Tu		31 Su	31 We	

© www.calendarpedia.com

Some holidays may be subject to change.



Making Recertification Happen

Operationalizing PCN 13-02

Coordination & Data Sharing

Coordination

- Any RWHAP recipients/subrecipients can coordinate with other recipients/subrecipients
- Establish common eligibility criteria for recipients and services
- Process for checking eligibility across multiple recipients/subrecipients in a jurisdiction

Data sharing

- All RWHAP recipients/subrecipients should consider data sharing
- Can occur between recipients and among subrecipients
- HAB encourages recipients to pursue data sharing agreements
- Reduces burden on all stakeholders and clients

Approaches to Streamline Eligibility & Recertification

- **Permitting clients to attest to their ongoing eligibility by phone or email then mail or bring in documentation on their next visit**
- **Setting specific times of the year when 6-month and annual recertification takes place**
- **Establishing the same eligibility criteria and standards for documentation across multiple recipients/subrecipients and using data sharing agreements**



Coastal Family Health Center (RW Part C) Eligibility Guidelines

PCN 13-02 Clarifications on RWHAP Client Eligibility
Determinations and Recertification Requirements

Enrollment Policy:

- Patients requesting HIV/AIDS care from CFHC must first establish appointment with Case Manager for eligibility determination and orientation to the program.
- Applicants required to submit the following required documentation upon initial visit with Case Manager:
 - **Proof of positive HIV or AIDS status**
 - **Proof of Mississippi residency**
 - **Proof of income**
 - **Verification of health insurance status**
- Enrollment in the program is conducted by the Case Manager and will include, but is not limited to: intake (including psychosocial in addition to mental health and substance abuse assessments), orientation and referrals to other support services as appropriate.

Recertification:

- Patients must be recertified by the Case Manager at least every six months to ensure that a patient's residency, income and insurance statuses continue to meet eligibility requirements.
 - The Case Manager will complete an additional psychosocial assessment including mental health and substance abuse assessments
 - During this session with Case Manager, the patient will verify proof of residency, income and insurance status by either self-attestation of no change or proof documenting the changes.
- Annual recertification process will include the completion of annual registration packet with documentation of Mississippi residency, proof of income, and health insurance status. Verification of HIV/AIDS status is not required.

Guidelines:

- Enrollment in the Ryan White Program will be accomplished for all patients seeking services related to their diagnosis of HIV or AIDS.
- Enrollment in the program is voluntary.
- If all required documentation, e.g. income, is not provided, ancillary services will be limited.
- Patients may opt-out of the program at any time by notifying the Program Manager.
- Patients may also decide to limit their participation in the program for any services that they do not wish to receive.
- All patients must be recertified for the program on a biannual basis.

Early 2016

- Only 39% of patients had reported proof of income
- Conducted QI project to determine reasons, identified as the following:
 - Insured patients who had little or no co-pay amounts who only received ancillary services
 - Assumed submitting income to Part B for ADAP was also submitting to clinic

Data Sharing

- Utilizing income information from data sharing agreement with Mississippi State Department of Health (RW Part B) and MOUs with other local organizations:
 - Reduced burden on clinic
 - Reduced burden on patients
 - 77% (+38%) of patients now have documented incomes!
 - Agreements can also be utilized to collect other pertinent eligibility information

Coordinating Client Eligibility and Recertification Requirements

Frances Lawless, Director
Office of Health Policy &
AIDS Funding
City of New Orleans
Ryan White Part A

Kira Friedrich, Services
Manager
STD/HIV Program
Office of Public Health
State of Louisiana
Ryan White Part B

The Background Issues

- Prior to 2016 LA was a non Medicaid expansion State
- Part B/ADAP supports the Louisiana Health Access Program (LA HAP)
- Greater client demand for services than federal resources
 - Waiting list implemented 2010 – 2012
 - Many clients waited 4 – 6 months in order to access services
- Part B audits by the Louisiana Legislative Auditors (2 consecutive years)
- Erred on side of caution for eligibility screening

More Background Issues

- 2011: Medicaid Managed Care plans rolled out
- 2012: Successful in enrolling more than 700 clients in PCIP
- 2013: Federally Facilitated Marketplace debuts
 - Third party payor snafu with BCBS delayed transition from PCIP to Marketplace
 - Law suit filed
 - Clients became confused and frustrated
- 2014: LA HAP Enrollment grew faster than staffing
- 2015: Back log of client applications became problematic

Recent Issues

- Challenges in clients understanding insurance coverage and processes
- Communication challenges documented in Part A and Part B service areas
 - Clients were not responding to letters and other mail
 - Clients were receiving refund checks
 - Clients were not notifying case managers of checks or received mail
- Mounting complaints from clients and providers, especially as clients lost insurance coverage and had unpaid bills.
- We needed a creative solution!

How did we address these issues?

- Compiled and categorized complaints
- Completed a work flow analysis
- Analyzed the source of the problems
- All grantees reworked areas that caused delay
- Requested additional LA HAP staff
- Requested Technical Assistance from HRSA
- Application review and eligibility determination delays were a result of an abundance of caution—taking the rules “too seriously.”

More Collaborative Improvements

- Consumer education sessions on Health Insurance
- Empowering clients to choose the best insurance plan for them
- Removed requirement of affidavits for income verification, and certain proofs of residency.
- Modified forms already in use by other grantees/providers
- Reviewing reciprocal eligibility through CAREWare data between participating grantees
- Client access should be ranked equally with financial verification!

Coordinated Recertification & Eligibility

- Decided on a common frequency for recertification
- Matched the client anniversary date between grantees
- Coordinated income eligibility FPL thresholds
 - State increased LA HAP services to 400% FPL
 - Part A increased threshold for all services to 500% FPL
- Both grantees use CAREWare to document client eligibility
- Established data sharing agreements

Coordinated Training & Communication

- Coordinated Case Management Trainings
- Shared communications
- Similar branding/messaging for clients
- Upcoming training for new web-based application

DATA SHARING, ELIGIBILITY/ RECERTIFICATION AND ADHERENCE EFFORTS – COLORADO PART B



Todd Grove

CDPHE Healthcare Access Unit
Supervisor

todd.grove@state.co.us

(303)692-2783

Importance of engaging community and providers

- Considerable historical issues with consumers and activists and health department
- Advocacy groups have raised alarms about data sharing systems in place in other jurisdictions
- Local activists raised these concerns within advisory groups

Asked those local activists to chair “data sharing committee” and get their engagement and sign-off on initiatives.



Enormous burden placed on consumers – endangering retention in care and adherence

A consumer may need to provide eligibility proof to multiple providers twice a year to:

- ✓ ADAP
- ✓ Medical clinic
- ✓ Mental health, substance abuse provider
- ✓ Case management agency
- ✓ Emergency financial assistance provider

Colorado Part A, B, C and D data elements approved by consumers:

- Date of birth, race, ethnicity
- Gender/Transgender status
- HIV /AIDS / HCV status
- Beginning and end date of current ADAP eligibility period
- Income, household size
- Insurance status (vigorous pursuit)
- Housing status
- Residential/mailing address
- Phone #
- CD4/ VL count (quarterly) from EHARS
- Data sent with eURN, not with name
- ADAP clients can opt-out of data sharing on application
- Would then need to recertify at all Ryan White providers
- Most opt-in, but some populations remain concerned

Other benefits of data sharing

- Since data sharing includes client contact information, all providers will be better able to reach clients and assure retention and care
- Data systems may still need to be adapted and configured with “side cars” that would provide the updated information, but not “overwrite” information uploaded by providers in CAREWare, other data systems.
- *NO case notes or MH / Substance abuse services would ever be shared be shared due to data sharing agreements.*

Combined ID Card – verification of eligibility



Medication and Medical Copay Assistance Identification Card

Name: Prance E Ponies
DOB: 11/20/1983
Eligibility Expiration: 11/30/2016
Coverage Type: CO PHIP
Identification Number: 9824008140

Pharmacy Claims
BIN: 004519
PCN: COPHIP
Group: 38031

Medical Claims
ID: 2400814
Bill: Emdeon ID
Group: 38009



Ramsell Public Health Rx
200 Webster Street, Suite 200
Oakland CA 94607 (888) 311-7632



CNIC Health Solutions
40 Wooten Rd # 104,
Colorado Springs, CO 80915 (719) 622-3300

Agencies permitted to use print out of current ADAP card to verify eligibility for services:

Other Program Efforts: Increasing Adherence

- Recertification frequently late
- Endangers payment of insurance premiums and timely access to medications (as well as services)
- ADAP members with Medicaid opting to drop ADAP due to reporting burden, complicating CHURN
- Over 85% of complaints to ADAP are regarding the burden of recertification

Additional effort to increase on-time recertification and medical / medication adherence

Safe + Sound

Text and email reminder system



COLORADO
Department of Public
Health & Environment

Please login

Sign In

[Forgot Password?](#)

[Forgot Username?](#)

If you do not have an account, please:

Register for an account

English

Español

New reminders system

iPad 3:14 PM 32%

Safe + Sound

www.safeplussound.org

SET YOUR REMINDERS

- TESTING
- MEDICATION
- REFILL
- RE-CERTIFICATION
- INSURANCE**
- WEEKLY TIPS

INSURANCE

When is your insurance open enrollment?

2 month

Would you like a reminder to check your coverage?

Choose your message delivery type.

Voice TXT Email

Set the reminder date.

8 day 8 month

When does your plan start?

2 month

Would you like a reminder to send your invoice for payment?

Choose your message delivery type.

Voice TXT Email

Safe + Sound

www.safeplussound.org

The screenshot shows the 'Safe + Sound' mobile application interface on an iPad. The status bar at the top indicates 'iPad', signal strength, '3:14 PM', and '32%' battery. The app title 'Safe + Sound' is displayed in blue and red text. Below the title is a dark blue header with the text 'SET YOUR REMINDERS'. A sidebar menu on the left contains the following items: TESTING, MEDICATION, REFILL, RE-CERTIFICATION, INSURANCE, and WEEKLY TIPS, each with a plus icon. The main content area is titled 'RE-CERTIFICATION' and contains the following questions and options:

RE-CERTIFICATION

What is your birth month?

2 month

(Reminder would be sent on the 5th of that month and every 6mo from that month)

Are you on Medicare?

- Yes
- No

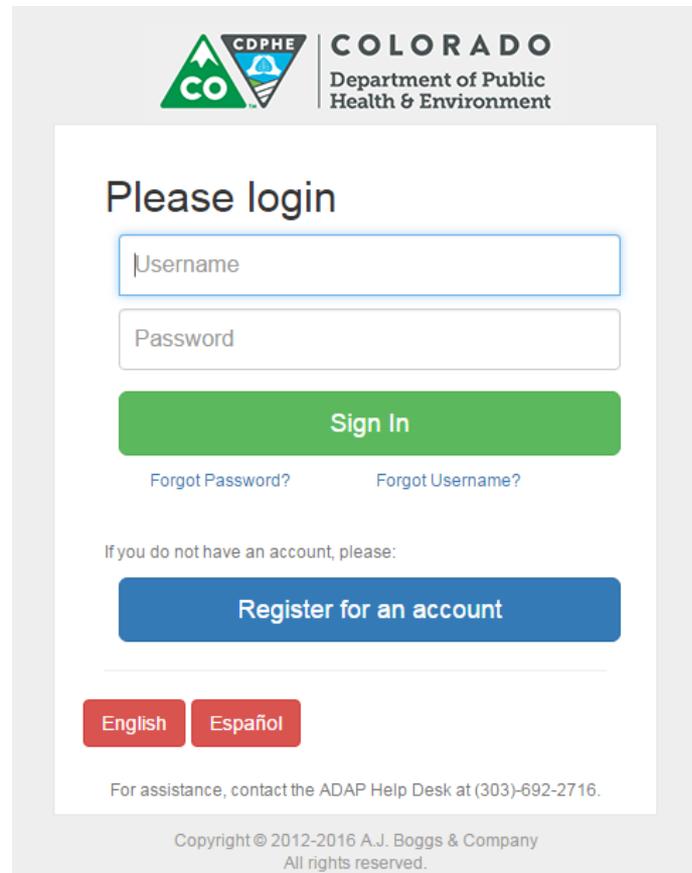
Would you like a reminder to send in your BTG application and/or invoice?

- Yes Set to 12/05 of the year.
- No

A green 'SAVE' button is located at the bottom of the form. The iPad home indicator bar at the very bottom shows icons for camera, home, and a star.

Online Application Portal

Online application for ADAP clients, soon to be rolled out for PHIP (PrEP) applicants.



The screenshot shows the login page for the Colorado Department of Public Health & Environment. At the top left is the CDPHE logo, which includes a green triangle with a white mountain and the letters 'CO', and a blue triangle with a white mountain and the letters 'CDPHE'. To the right of the logo is the text 'COLORADO Department of Public Health & Environment'. Below the logo and text is the heading 'Please login'. There are two input fields: 'Username' and 'Password'. Below these fields is a green 'Sign In' button. Underneath the 'Sign In' button are two links: 'Forgot Password?' and 'Forgot Username?'. Below these links is the text 'If you do not have an account, please:' followed by a blue 'Register for an account' button. At the bottom of the form are two red buttons: 'English' and 'Español'. Below the buttons is the text 'For assistance, contact the ADAP Help Desk at (303)-692-2716.' At the very bottom of the page is the copyright notice: 'Copyright © 2012-2016 A.J. Boggs & Company All rights reserved.'

Questions

You can click on the envelope icon to send us a question

Questions received during this webinar will be used in development of FAQs.

You may use this email address after the webinar to submit additional questions.



Clarifications on RWHAP Client Eligibility Determinations & Recertification Requirements

A Refresher on PCN 13-02 for RWHAP Recipients