# Hospital Presumptive Eligibility (HPE) All-State Meeting

## Resources for Implementing the HPE Program December 4, 2013

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## Agenda

- Welcome and Introductions
- Review of HPE program requirements
- HPE Planning and Implementation Resources
- Perspective on HPE from the American Hospital Association
- Questions?
- Closing Remarks and Next Steps

## Review of the HPE Program

## **HPE Program Review**

- The Affordable Care Act (ACA) gives qualified hospitals the opportunity to determine presumptive eligibility (PE) for certain Medicaid-eligible populations
- Provides:
  - Temporary enrollment in Medicaid
  - Access to, and compensation for, hospital-based services
  - Pathway to longer-term Medicaid coverage
- The HPE program is an option for hospitals; states must maintain a program if hospitals express interest

## State Responsibilities

- CMS final rule on HPE provides states with flexibility in HPE program design, particularly:
  - Training and certification of hospital staff
  - Tracking performance of hospital staff
  - Overseeing program quality
- States must submit a State Plan Amendment that outlines their planned approach for the HPE program, including:
  - Training materials for hospitals
  - PE application (if the state intends to use a written application)

# HPE Planning and Implementation Resources

## HPE Frequently Asked Questions

- CMS received questions and comments on the HPE program via:
  - Rulemaking process
  - All-state webinars
  - Affinity group of states with prior PE experience
  - State Operations and Technical Assistance (SOTA) calls
- FAQs address common questions about the HPE program in general, as well as questions specific to:
  - Application processing
  - Eligible populations
  - Qualified entities
  - Training and standards
  - Availability of Federal Match in the PE period

#### RWJF State Network Brief on HPE

- Addresses key considerations for states as they design their HPE programs:
  - Qualified provider requirements
  - Training and certification
  - Performance standards
  - Plan enrollment and payment
- Written by CHCS for the State Health Reform Assistance Network, a national program of the Robert Wood Johnson Foundation

## Highlights of the State Network Brief

#### Qualified Provider Requirements

- Only hospital employees are authorized to perform PE determinations;
   third-party contractors are not allowed
- States must ensure that individuals applying for PE are informed about how to file a regular application for Medicaid

#### Training and Certification

- CMS does not mandate a specific training format: examples include inperson, telephone conference or webinar, or web-based training
- Method for training and certification must be submitted with the State Plan Amendment

## Highlights of the State Network Brief (continued)

#### Performance Standards

- States may establish standards based on:
  - the proportion of individuals determined presumptively eligible by the hospital who submit a full application; or
  - the proportion of individuals who are determined eligible for Medicaid based on the full application.
- Hospitals may only be disqualified from conducting PE determinations after additional training or other reasonable corrective action measures.

#### Plan Enrollment and Payment

- States may want to establish policies to guard against steerage toward particular managed care plans as part of the HPE process.
- The enhanced federal match for the newly eligible Medicaid expansion population can be claimed (including retroactively) once the individual is determined eligible for Medicaid outside a PE process.

## **HPE Training Template**

- Template slides that states can modify for use as training materials with their hospitals
- Provides general information on the HPE program (in black text) and indicates areas for state-specific customization of the program (in blue text)
- Once completed by a state, could be included as part of the SPA submission to indicate how the state intends to train hospitals on the HPE program requirements

## Sample HPE Forms

- Templates to be modified as necessary by states for initial administration of HPE programs
- Forms include:
  - Hospital Statement of Interest in participating in the HPE program
  - Qualified Entity Application for Participation
  - Qualified Entity Responsibilities and Agreement
  - Simplified Qualified Entity Agreement

## Hospital Presumptive Eligibility Standards-Basic Background

- States may establish standards for hospitals on share of PE applicants who:
  - File a regular Medicaid application, and
  - Are found eligible for regular Medicaid
- States may use alternative/additional standards
- An important tool for shaping implementation of hospital PE

## Possible Approaches to HHS-Defined Measures

- Base Benchmarks on Actual Experience
- Consider Increasing Standards Over Time
- Use an Outlier Approach
- Consider a Multi-Step Process

## Hospital Presumptive Eligibility Standards - Additional Measures to Consider

- Check for existing enrollment in Medicaid
- Prevent multiple PE applications
- Accuracy of PE determinations
- Connecting people to care
- Engaging outpatient departments
- Other standards

## Hospital Presumptive Eligibility Standards - Conclusion

- Important for each state to develop performance standards in collaboration with hospitals that support their PE goals
- May want to gather benchmark data initially prior to establishing firm standards
- May want to consider more limited standards in short run to ensure PE program integrity. For example:
  - Hospitals conduct PE determinations accurately in high share of cases based on data provided
  - Hospitals ensure they verify that applicant is not already enrolled in Medicaid prior to conducting PE determination

# American Hospital Association HPE Perspectives

## Questions?

#### Selected Resources

CMS Summary of July 9, 2013 Regulations:

http://www.medicaid.gov/State-Resource-Center/Eligibility-Enrollment-Final-Rule/Overview-of-Final-Eligibility-and-Enrollment-II-Rule.pdf

RWJF/State Network Brief on HPE:

http://www.statenetwork.org/resource/implementation-of-the-affordable-care-acts-hospital-presumptive-eligibility-option-considerations-for-states/#sthash.jmAQ9joc.dpuf

Enroll America Hospital Presumptive Eligibility Toolkit:

http://www.enrollamerica.org/toolkits/pe/home.html

## Thank you for participating in today's webinar!