

**INFORMATIONAL LETTER NO. 2220-MC-FFS**

**DATE:** February 24, 2021

**TO:** Iowa Medicaid Integrated Health Home Providers

**APPLIES TO:** Managed Care (MC), Fee-for-Service (FFS)

**FROM:** Iowa Department of Human Services (DHS), Iowa Medicaid Enterprise (IME)

**RE:** Integrated Health Home (IHH) Documentation of Eligibility Requirements

**EFFECTIVE:** July 1, 2020

This letter is to clarify for IHHs the documentation required to enroll a Medicaid member into the Health Home Program.

The Office of Inspector General (OIG) Report CIN A-07-18-04109 issued April 7, 2020, "Iowa Inadequately Monitored Its Medicaid Health Home Providers, Resulting in Tens of Millions in Improperly Claimed Reimbursement," details the findings of the program audit conducted for calendar years 2013 through 2016. During this audit, the OIG found that Iowa improperly claimed federal Medicaid reimbursement for payments made to health home providers that did not comply with federal and state requirements. As a result, the OIG made several recommendations for program improvement and required a corrective action plan to bring Iowa into compliance. The IHH State Plan Amendment (SPA) was amended to reflect the state's corrective action plan related to the findings and included implementing quality oversight processes to ensure proper documentation.

Effective July 1, 2020, the IHH is required to have documentation of an assessment completed by a Licensed Mental Health Professional (LMHP) that identifies the member's diagnosis and functional impairments prior to submitting an enrollment request.

An enrollment request submitted to the Managed Care Organizations (MCOs) must include a completed notification form along with documentation that provides the member's diagnosis and functional impairments. For FFS member enrollment, an enrollment request must be submitted through the Iowa Medicaid Providers Access (IMPA) portal.

To determine compliance with the documentation of the member's eligibility prior to enrollment, the IME will complete retrospective chart reviews. Any record which does not contain the required diagnosis and functional impairment documentation will be subject to recoupment of the Per Member Per Month (PMPM) payment for every month the member was enrolled without the supporting eligibility documentation.

To be eligible for IHH services the member must have a diagnosable mental, behavioral, or emotional disorder that causes serious functional impairment, which substantially interferes with or limits one or more major life activities including the member's role or functioning in family, school, or community activities.

Serious Mental Illness (SMI) is defined as an adult that has a persistent or chronic mental illness, having (verified within the past year) a behavioral or emotional disorder specified within the most current Diagnostic and Statistical Manual of Mental Disorders (DSM) published by the American Psychiatric Association or its most recent International Classification of Diseases, that causes serious functional impairment and substantially interferes with or limits one or more major life activities including functioning in family, school, employment, or community. SMI may co-occur with substance use disorder, developmental, neurodevelopmental or intellectual disabilities but those diagnoses may not be the clinical focus for Health Home services.

Serious Emotional Disturbance (SED) is defined by a child having (verified within the past year) a diagnosable mental, behavioral or emotional disorder specified within the most current DSM of mental disorders published by the American Psychiatric Association or its most recent International Classification of Diseases, which results in functional impairment that substantially interferes with or limits the child's role or functioning in family, school, or community activities. SED may co-occur with substance use disorder, developmental, neurodevelopmental or intellectual disabilities but those diagnoses may not be the clinical focus for Health Home services.

Functional Impairment (FI) as referenced in the definitions above means the loss of functional capacity that is:

- Episodic
- Recurrent
- Continuous

**And**, substantially interferes with or limits the achievement of or maintenance of one or more developmentally appropriate:

- Social
- Behavioral
- Cognitive
- Communicative
- Adaptive skills,

**And**, substantially interferes with or limits the individual's functional capacity with:

- Family
- Employment
- School

- Community.

The level of functional impairment must be identified through an assessment completed by the LMHP. It must be signed and dated within 365 days of enrollment and include DSM codes, as well as symptoms, behaviors, frequency and intensity for the functional impairment.

Functional impairment does not include difficulties resulting from temporary and expected responses to stressful events in a person's environment.

For children three years of age or younger, the Diagnostic Classification of Mental Health and Developmental Disorders of Infancy and Early Childhood Revised (DC: 03R) may be used as the diagnostic tool. For children four years of age and older, the Diagnostic Interview Schedule for Children (DISC) may be used as an alternative to the most current DSM.

If you have any questions regarding the IHH program requirements, please call 515-974-3050 or email [healthhomes@dhs.state.ia.us](mailto:healthhomes@dhs.state.ia.us).

The IME appreciates your continued partnership as we work to improve health outcomes.

Please contact Provider Services by email at [IMEProviderServices@dhs.state.ia.us](mailto:IMEProviderServices@dhs.state.ia.us), by phone at 1-800-338-7909, or locally in Des Moines at 515-256-4609 if you have any questions regarding billing for Health Home Services.