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Summary and Recommendations

**Current Medicaid Delivery System for
Children in State Custody, including
those with complex needs Ages 18-21**

July 2023

Background

- I. Assess the array of Medicaid services and authorities available to children ages 18-21 who are aging out of state custody, have aged out of state custody, and/or have complex needs
- II. Review and provide recommendations to strengthen the Georgia Families 360° Contract based on a comparison with Texas Star Health Contract requirements
- III. Document and assess the current state of care coordination between the Division of Family and Children Services (DFCS) and the Department of Behavioral Health and Developmental Disabilities (DBHDD) which serve as the state entities responsible for ensuring medically necessary care in the Medicaid program is provided to children with complex needs ages 18-21 who are aging out of state custody.

ARRAY OF MEDICAID COVERERED SERVICES AND AUTHORITIES FOR CHILDREN

REVIEW OF MEDICAID SERVICES AND AUTHORITIES

ARRAY OF SERVICES

Sellers Dorsey reviewed the state's existing program authorities and provided OHSC with a matrix that identifies the array of Medicaid services available under the Medicaid State Plan and approved Home and Community-Based Services waivers. For a full list of services, refer to the *Georgia Medicaid Service Matrix*. The document includes:

- **State Plan Services** – Medicaid services covered for all children, including those aging out of state custody or who have aged out of state custody
- **Georgia Pathways (1115 Waiver)** – Implemented on July 1, 2023
- **Child Welfare Policy Manual**
 - Division of Family and Children Services (DFCS) extended Medicaid coverage policy for individuals who age out of foster care through the last day of the month in which these individuals reach 26 years of age.
- **Home and Community Based Services Waivers to include:**
 - **New Options Waiver (NOW)**
 - **Independent Care Waiver Program (ICWP)**
 - **Comprehensive Supports Waiver**

Conclusion: Based on a review of the Georgia Medicaid State Plan, Waivers, and Child Welfare Policy, Sellers Dorsey did not find any existing service gaps.

Georgia Families 360° Contract Review and Recommendations

GEORGIA FAMILIES 360°

CONTRACT REVIEW AND RECOMMENDATIONS

Sellers Dorsey reviewed the Georgia Families 360° contract for the foster care population and provided recommendations for opportunities to strengthen the contract as part of a full report on recommendations for the CMO contracts. Below are specific recommendations and opportunities to improve the Georgia Families 360° contract and enforcement of the contract. The Sellers Dorsey team has also shared a comparison of the contract with provisions in the Texas' STAR Health Contract.

Recommendations:

- Implement prescriptive contract language to define the CMO's role and responsibility vis a vis the Georgia Division of Family and Children Services (DCFS). The Georgia Families 360 program could benefit from more specificity in these program requirements and specify requirements on the CMO's responsibility in coordinating with DCFS.
- Incorporate contract language into the Georgia Families 360° contract to hold plans accountable for care coordination/case management staffing models and operational processes. This will help ensure members gain the support required for effective care coordination. Additionally, requirements for staffing to meet members' needs such as, to the extent feasible, co-location of physical and behavioral health staff, and requirements of warm transfers can assist with care coordination and case management processes.

GEORGIA FAMILIES 360°

CONTRACT REVIEW AND RECOMMENDATIONS

- Set specific, detailed expectations pertaining to Electronic Medical Records (EMRs) in the contract language moving forward. Such language should provide specific and extensive details on the state's expectations and plans for EMR security, features, and reporting requirements. Certain states have even required CMOs to develop and maintain "health passports" for their members.
- Bolster expectations regarding substance use disorder (SUD) and residential treatment facilities, as the current contract does not provide detailed protocols. The Georgia Families 360 program may benefit from setting detailed expectations regarding SUD and residential treatment facilities in its contract language.
- Include requirements related to trauma-informed care, including requirements related to CMO staff training and provider network development. Using trauma-informed care as a lens for these and other managed care functions may help strengthen the Georgia Families 360 contract.
- While not directly related to the comparison of these two managed care program contracts, the state should update its 2015 Interagency Cooperative Agreement (last signed and updated in 2015) to formalize the interagency agreement between DCH and sister agencies to provide for more coordinated and collaborative Georgia Families 360 CMO° contract oversight between DCH and these sister agencies in accordance with the CMO contract goals that build on the previous DCH Joint Taskforce structure and processes.

GEORGIA FAMILIES 360°

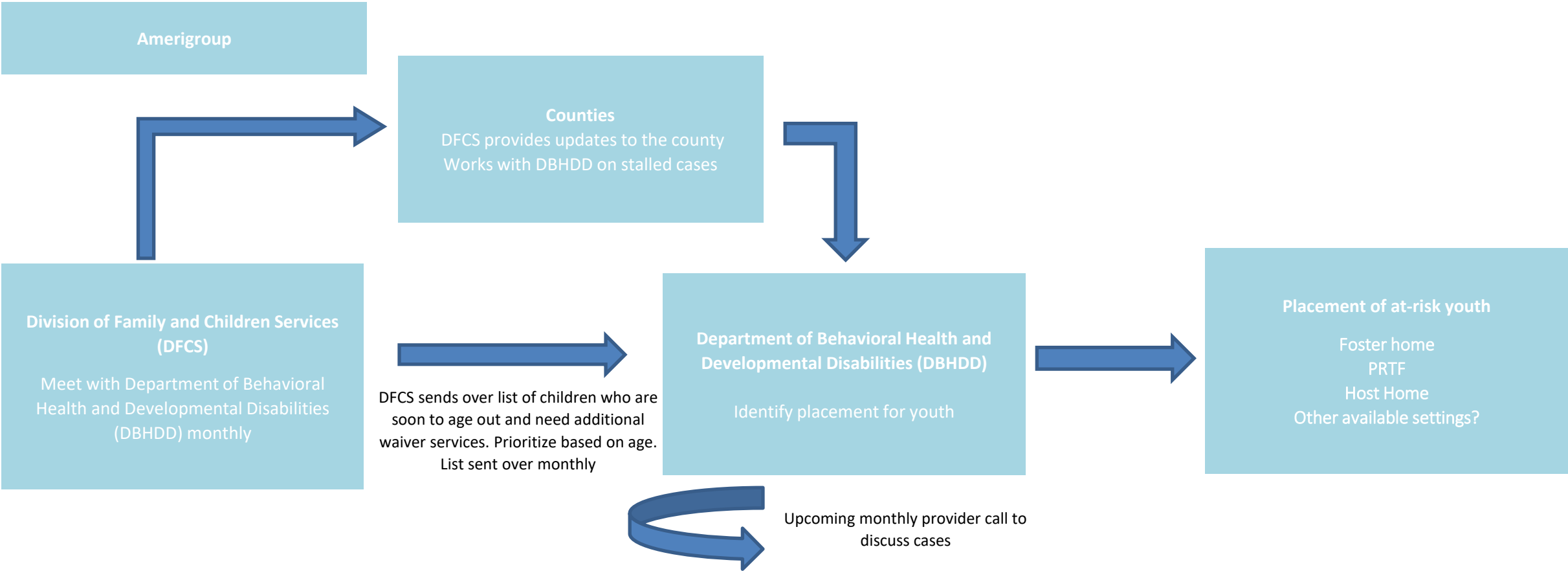
CONTRACT REVIEW AND RECOMMENDATIONS

- The Georgia Families 360° contract language should also more clearly define the CMO's role and responsibility vis a vis the Georgia Division of Family and Children Services (DFCS), Department of Behavioral Health and Developmental Disabilities (DBHDD), Department of Juvenile Justice (DJJ), Department of Public Health (DPH), Department of Early Care and Learning (DECAL), and Department of Education (DOE). The Georgia Families 360° program could benefit from more specificity in these program requirements and should specify requirements on the CMO's responsibility in coordinating with these sister agencies.

PLACEMENT & CARE COORDINATION PROCESS BETWEEN DFCS & DBHDD

PLACEMENT PROCESS BETWEEN DFCS AND DBHDD

PROCESS FLOW



PLACEMENT PROCESS BETWEEN DFCS AND DBHDD

PROCESS NARRATIVE

Sellers Dorsey met with representatives from the Division of Family and Children Services (DFCS) and the Department of Behavioral Health and Developmental Disabilities (DBHDD), to review the current process for children aging out of foster care with complex needs. Through these meetings, Sellers Dorsey has:

- Outlined the process flow between the two agencies
- Captured challenges felt by both agencies
- Shared recommendations and next steps to help improve processes and close gaps

Process for Children aging out of DFCS care (21) or soon to become 21 who need Waiver Services

1. **DFCS** identifies (through assistance from the county DFCS Caseworker) whether a youth in DFCS's care needs the services provided by an IDD waiver, a year or more in advance of a child turning 21 years of age. Youth are identified by the county DFCS workers as potentially needing waiver services and sent to one designated individual within DFCS to be added to the DFCS list beginning 18 months prior to their 21st birthday.
2. This list is sent monthly from the designated individual within DFCS to the **Department of Behavioral Health and Developmental Disabilities (DBHDD)** to begin the waiver application process. **DBHDD** begins the process of identifying where these young adults can be placed. These children will be asked by DBHDD to apply for IDD NOW/COMP Waiver services and be prioritized in the application process due to their age and involvement with DFCS.

PLACEMENT PROCESS BETWEEN DFCS AND DBHDD

PROCESS NARRATIVE, CONTINUED

- 3. Application Process with DBHDD** – NOW/COMP Waiver applications are available online to be completed and submitted by DFCS county workers. DFCS is identified as the referral source for these waiver applications so that they can be prioritized.
 - a. The Regional Field Office for DBHDD provides assistance to DFCS county and Regional Field Program Specialists throughout the process.
 - b. The Regional Field Office Intake and Evaluation staff will review each submitted application and ensure the application is complete and will identify the DFCS cases as Urgent. Note: DBHDD has developed training on the waiver submission process for DFCS county workers.
 - c. Once an application is complete, the DBHDD Regional Field Office staff will send the information to a DBHDD psychologist who reviews each application for pre-eligibility determinations. The psychologist may schedule a face-to-face interview. The psychologist determines pre-eligibility.
 - d. Final eligibility determinations are made by Alliant-Georgia Medical Care Foundation.
- 4. DBHDD Planning List Administrator** starts a series of assessments for the identified high priority/urgent needs youth and then sends them to the Waiver Service Coordinators to create an individual care plan as soon as the youth's application is completed.

PLACEMENT PROCESS BETWEEN DFCS AND DBHDD

PROCESS NARRATIVE, CONTINUED

5. The DBHDD transition team works to identify settings in which youth may be transitioned and receive waiver services.

a. Residential placement:

- i. Regional DBHDD workers** coordinate with DFCS county caseworkers, and regional specialists work with care coordinators at the Georgia Families 360 CMO on a limited basis.
- ii. Youth in Foster Homes** – Many foster homes are willing to continue to serve youth and provide stability even after they have aged out of DFCS custody. DFCS will fund this placement until age 21 but needs to determine if DBHDD funding can provide for continued financial support for these placements post transition.
- iii. Host Homes** - Some foster homes are converted to host homes, but this conversion takes much longer than anticipated. Converting foster homes to host homes may be the best option for providing children with the continued housing and family support that they require post transition.
- iv. PRTFs** – Needed for some of the highest need cases where foster home/host homes are not available. Additional in-state PRTFs are needed in Georgia.
- v. Crisis Homes** – have the highest level of support and are meant for short term stays.

b. Independent Living:

- i.** Currently DBHDD is placing individual calls to providers attempting to find providers who can provide transitional aging support.

PLACEMENT PROCESS BETWEEN DFCS AND DBHDD

OPPORTUNITIES

- Sellers Dorsey has identified that there appears to be no reliable method to understand who needs Home and Community-Based Waiver services. Our understanding is that the creation of the list of individuals is manual and dependent on DFCS county workers to identify individuals who may need waiver services.
- The application process is challenging for the end user and has broken down at different parts of the process (turnover of staff, new data management system, delays in starting applications).
- Like other states, Georgia is experiencing workforce shortages impacting both its health and human service agencies, as well as HCBS providers.
- Currently, only age is being used to prioritize the list. Ideally, other factors and criteria should be used as well.
- The list often remains unchanged from month to month because of challenges finding appropriate placement for youth.
- There is opportunity for the state's CMO for the Georgia Families 360 program to be more engaged and hold more accountability for the transition.
- The foster home to host home transition process is administratively burdensome. The turnaround time is a hurdle to recruiting and retaining placement options for youth with complex needs.

PLACEMENT PROCESS BETWEEN DFCS AND DBHDD

RECOMMENDATIONS

- Establish centralized and standardized processes that are memorialized to identify who is on the DFCS list, stakeholders and agencies involved, and process flow
- Consider cases sooner in the process than currently structured to allow more time for planning/solutioning
- Oversight of the Georgia Families 360 program contract should be cross-agency
- Georgia Families 360 CMO should be more involved in the management and coordination of the transition process
- Create a focus group for providers and establish regular touch points
- Compare licensure requirements for foster homes and host homes to assess similarities, differences, and opportunities to streamline
- Consider a dual licensure option for foster homes and host homes

SHARED DOCUMENTS

Sellers Dorsey has created the following deliverables that go into more detail.

- *Georgia Medicaid Services Matrix* – lists all Medicaid services from the State Plan, 1115 Waivers, 1915(c) Home and Community-Based Services Waivers, and the Georgia Child Welfare Policy Manual.
- *Georgia – Texas Contract Comparison* – compares contract provisions between the Georgia Families 360° contract and the equivalent contract in Texas, STAR Health.
- *Georgia Medicaid IDD Waiver Comparison* – this document compares the services offered in the NOW and COMP waivers.