

DEPARTMENT OF HUMAN SERVICES, DIVISION OF MEDICAL SERVICES

SUBJECT: Life360 HOME Program

DESCRIPTION:

Statement of Necessity

DHS is creating the Life360 HOME program to contract with hospitals to provide Medicaid clients in target populations with intensive care coordination services to ensure they are connected to medical services and nonmedical supports in their communities and to address their social determinants of health (SDOH) needs. Life360s are designed to supplement not supplant existing supports and services.

Medical care will continue to be delivered and billed as it currently is. This rule is necessary to:

- Reduce the maternal and infant mortality rates in the state and reduce long-term costs;
- Reduce the additional risk for disease and premature death associated with living in a rural county;
- Strengthen financial stability of small, rural hospitals, and enhance access to medical services in rural counties;
- Fill gaps in continuum of care for individuals with serious mental illness and substance use disorders;
- Increase their engagement in educational and employment opportunities among Medicaid beneficiaries most at risk for poor health outcomes associated with poverty;
- Reduce inappropriate and preventable utilization of emergency departments and inpatient hospital settings; and
- Increase the use of preventative care and health screenings.

Rule Summary

To achieve the above, the Division of Medical Services creates the Life360 HOME Provider Manual, seeks a new 1915(b) waiver, and amends the State Plan. This rule provides for intensive care coordination services to high-risk Medicaid populations. The services include home visiting services for women with high-risk pregnancies and care coordination services for individuals in rural areas with mental illness or substance use disorder. The aim of the program is to improve maternal and child health outcomes, fill gaps in the continuum of care client with mental illness, and increase engagement in educational and employment opportunities among Medicaid clients most at risk for poor health outcomes associated with poverty. In addition, the State Plan is amended to provide women with high-risk pregnancies who are eligible for Medicaid, but are not in the New Adult Medicaid Expansion Group, can receive home-visiting services through Arkansas's Life360 HOME program, authorized under the ARHOME Section 1115 waiver program; and allows for hospitals approved to provide Maternal Life360 HOME

services can receive \$300 per member per month for women enrolled in the Maternal Life360 HOME who are enrolled in an Arkansas Medicaid aid category that is not the ARHOME Medicaid aid category.

PUBLIC COMMENT: A public hearing was held on this rule on October 20, 2022. The public comment period expired on November 7, 2022. Due to its length, the public comment summary is attached separately.

Lacey Johnson, an attorney with the Bureau of Legislative Research, asked the following questions and received the following answers:

1. Ark. Code Ann. § 23-61-1010(b)(2)(B) states that eligible hospitals must provide “a federally recognized evidence-based home visitation model to a woman during pregnancy and to the woman and child for a period of up to twenty-four (24) months after birth.” The proposed state plan states, “The services start during pregnancy and will be provided through the baby’s first 12 months.” Why is the timeframe in the state plan shorter than that in the statute? **Response:** DHS intends to provide Maternal Life360 HOME services to eligible women enrolled in ARHOME or any other Medicaid aid category (e.g., pregnant Woman, Parent Caretaker Relative). Women who are enrolled in ARHOME will receive Life360 services for up to 24 months after the baby’s birth. Women enrolled in other Medicaid aid categories will receive services up to 12 months after the baby’s birth. Ark. Code Ann. § 23-61-1010(b)(2)(B) and ARHOME’s 1115 demonstration Special Terms and Conditions regulate the ARHOME program, while the state plan amendment, along with the 1915(b) waiver, will regulate the Life360 participation of women in other Medicaid aid categories.

2. As mentioned in the previous question, the proposed state plan provides for services during the first 12 months of a baby’s life. Section 210.100(A)(2) of the proposed rules also provides for a 12-month timeframe. Section 203.230(A) of the proposed rules requires a Maternal Life360 to cover home visiting services for “at least the first two (2) years of the baby’s life.” Why are these time periods different? **RESPONSE:** Section 210.100(A)(2) provide the two time frames (24 months and 12 months) depending on whether the client is enrolled in ARHOME or in another Medicaid aid category.

2. If enrolled in ARHOME at any point during enrollment in the Maternal Life360 program, was enrolled in the Maternal Life360 while pregnant with a high-risk pregnancy and delivered the baby within the previous twenty-four (24) months
OR If enrolled in a Medicaid program that is not ARHOME for the full duration of enrollment in the Maternal Life360 program, was enrolled in the Maternal Life360 while pregnant with a high-risk pregnancy and delivered the baby within the previous twelve (12) months. High-risk pregnancy must be verified through a completed referral form from the client’s physician that includes the most current clinical note.

Section 203.230(A) refers to the Life360 home visiting provider criteria. Because the Life360 HOME will serve both ARHOME clients and clients in other Medicaid aid categories, the home visiting provider must be able to serve women for 24 months. The home visiting agency will provide services to some women for only 12 months after the

baby's birth, but to be eligible to partner with a Life360 HOME, the home visiting agency must be able to serve women for 24 months.

3. Section 203.230(B) of the proposed rules states that Success Life360 partners "must be experienced in working with young adults most at risk of long-term poverty." Ark. Code Ann. § 23-61-1010(a)(3) requires assistance for "young adults most at risk of poor health due to long-term poverty." What is the difference between these two categories?

RESPONSE: There is no difference. The young adults who will be served by the Success Life360 HOME are most at-risk of long-term poverty, and, by the nature of poverty's correlation with health outcomes, at-risk of poor health.

4. (Possibly the same question as #2.) Section 220.300(A) states that services will be provided for 2 years to clients enrolled in a QHP through ARHOME and 1 year for clients enrolled in any other Medicaid category. Why are these time periods different?

RESPONSE: DHS will be providing different service lengths to Maternal Life360 HOMEs based on the Medicaid program in which they are enrolled.

The proposed effective date is January 1, 2023.

FINANCIAL IMPACT: The agency indicated that this rule has a financial impact.

Per the agency, the total estimated cost to implement this rule is \$6,463,500 for the current fiscal year (\$1,224,190 in general revenue and \$5,239,310 in federal funds) and \$16,871,000 for the next fiscal year (\$3,219,284 in general revenue and \$13,651,716 in federal funds). The total estimated cost by fiscal year to state, county, and municipal government to implement this rule is \$1,224,190 for the current fiscal year and \$3,219,284 for the next fiscal year.

The agency indicated that there is a new or increased cost or obligation of at least \$100,000 per year to a private individual, private entity, private business, state government, county government, municipal government, or to two or more of those entities combined. Accordingly, the agency provided the following written findings:

(1) a statement of the rule's basis and purpose;

The Director of the Division of Medical Services (DMS) creates the Life360 HOME Program to contract with hospitals to provide Medicaid clients in target populations with intensive care coordination services to ensure they are connected to medical services and nonmedical supports in their communities and to address their social determinants of health needs.

(2) the problem the agency seeks to address with the proposed rule, including a statement of whether a rule is required by statute;

This rule is necessary to:

- Reduce the maternal and infant mortality rate in the state and reduce long-term costs;
- Reduce the additional risk for disease and premature death associated with living in a rural county;
- Strengthen financial stability of small, rural hospitals and enhance access to medical services in rural counties;
- Fill gaps in continuum of care for individuals with serious mental illness and substance use disorders;
- Increase their engagement in educational and employment opportunities among Medicaid beneficiaries most at risk for poor health outcomes associated with poverty;
- Reduce inappropriate and preventable utilization of emergency departments and inpatient hospital settings; and
- Increase the use of preventative care and health screenings.

(3) a description of the factual evidence that:

(a) justifies the agency's need for the proposed rule; and

(b) describes how the benefits of the rule meet the relevant statutory objectives and justify the rule's costs;

This rule is necessary to:

- Reduce the maternal and infant mortality rate in the state and reduce long-term costs;
- Reduce the additional risk for disease and premature death associated with living in a rural county;
- Strengthen financial stability of small, rural hospitals and enhance access to medical services in rural counties;
- Fill gaps in continuum of care for individuals with serious mental illness and substance use disorders;
- Increase their engagement in educational and employment opportunities among Medicaid beneficiaries most at risk for poor health outcomes associated with poverty;
- Reduce inappropriate and preventable utilization of emergency departments and inpatient hospital settings; and
- Increase the use of preventative care and health screenings.

(4) a list of less costly alternatives to the proposed rule and the reasons why the alternatives do not adequately address the problem to be solved by the proposed rule;

N/A

(5) a list of alternatives to the proposed rule that were suggested as a result of public comment and the reasons why the alternatives do not adequately address the problem to be solved by the proposed rule;

N/A

(6) a statement of whether existing rules have created or contributed to the problem the agency seeks to address with the proposed rule and, if existing rules have created or contributed to the problem, an explanation of why amendment or repeal of the rule creating or contributing to the problem is not a sufficient response; and

N/A

(7) an agency plan for review of the rule no less than every ten (10) years to determine whether, based upon the evidence, there remains a need for the rule including, without limitation, whether:

(a) the rule is achieving the statutory objectives;

(b) the benefits of the rule continue to justify its costs; and

(c) the rule can be amended or repealed to reduce costs while continuing to achieve the statutory objectives.

The Agency monitors State and Federal rules and policies for opportunities to reduce and control costs.

LEGAL AUTHORIZATION: The Department of Human Services has the responsibility to administer assigned forms of public assistance and is specifically authorized to maintain an indigent medical care program (Arkansas Medicaid). *See* Ark. Code Ann. §§ 20-76-201(1), 20-77-107(a)(1). The Department has the authority to make rules that are necessary or desirable to carry out its public assistance duties. Ark. Code Ann. § 20-76-201(12). The Department and its divisions also have the authority to promulgate rules as necessary to conform their programs to federal law and receive federal funding. Ark. Code Ann. § 25-10-129(b).

This rule implements Act 530 of 2021. The Act, sponsored by Senator Missy Irvin, created the Arkansas Health and Opportunity for Me Act of 2021 and the Arkansas Health and Opportunity for Me Program. “The Department of Human Services shall adopt rules necessary to implement” the Health and Opportunity for Me Act. *See* Ark. Code Ann. § 23-61-1012, *as created by* Act 530.

DHS Responses to Public Comments Regarding Life 360 HOME Program

Amy Jo Grissom, HFA / PAT Coordinator

Inspired Communities Foundation

Comment: Thank you so much for our meeting this morning. This is something we've been looking forward to for some time. In talking over how realistic this is for our site, a few questions came up.

It was mentioned that there would be a payment of \$300 per family per month. Does this fluctuate month to month based on the current caseload for the month, or is it an amount that is set for each month based on the max caseload? Is the \$50,000 startup cost per hospital? per site the hospital contracts with? or per home visitor? And same with the mileage - per hospital? per site? or per home visitor?

Another thought that was discussed was the difference in programs (HFA vs. PAT). I am not sure how familiar you all are with the two, so I wanted to share a quick breakdown as maybe something to think about. An average full caseload for Healthy Families is 15 families seen weekly. An average full caseload for Parents as Teachers is 20 families seen twice monthly. So if we choose to use the HFA program (which is typically our choice with moms who have multiple risk factors), the total will be \$54,000 for a home visitor with a full caseload, who is completing 60 visits per month. On the other hand, if we choose to use the PAT program, the total will be \$72,000 for a home visitor with a full caseload, who is completing 40 visits per month. See the imbalance? It makes more sense for us financially to use only PAT, even though that really may not be the best option for the families. I'm wondering if there's a way to even this out? Just a thought?

Thanks again for your willingness to share today, and we are truly excited to see if this is an option for our organization.

Response:

DHS appreciates the interest in and enthusiasm for the development of the Life360 HOME program. To answer the commenter's questions, the program's per member per month payment rate will not change from month to month or based on changes in caseload. It will remain the same regardless of changes in the home visiting provider's staffing or caseloads. The start-up and transportation funding will be per Life360 HOME hospital.

DHS acknowledges that there are different costs for each home visiting model and that may make the use of some models more financially viable than others. We encourage hospitals to consider using a mix of models, where possible, to ensure the funding can best serve the diverse needs of the mothers and babies in their communities.

Child Care Aware of Northwest Arkansas

Comment: I wanted to give some insight/public comment on the proposed Life 360 program. I would like to voice concerns on how the money is being allocated and that there should be more thought and focus on staff salaries of the program and who it reaches on the ground level.

Response:

DHS appreciates the commenter's interest in the program. The funding structure of the program provides key areas of resources (e.g., technology, start-up funding), but allows—and expects—the funding to be to cover staffing costs. DHS recognizes that the most important cost of this program's success will be the people implementing it.

Bob and Kay Burton, Co-Founders

Inspired Communities Foundation

Comment: INSPIRED COMMUNITIES FOUNDATION - WHO WE ARE

Established in 2008, the Inspired Communities Foundation is a small 501(c) 3 evidence-based at-risk home visiting organization offering Parents as Teachers and Healthy Families America programs in four counties (Stone, IZard, Fulton, and Sharp) in north central Arkansas as part of the Arkansas Children's Hospital Home Visiting Network. Our organization has had consistently high marks in quality, participated in a number of pilot programs and has created a unique and successful program (Baby Bucks) to establish and maintain lifelong healthy habits and behaviors in children and adults.

THE NEED

None of the counties we serve have maternity care services, with the nearest maternal hospitals in Jonesboro, Mountain Home, Searcy, and Batesville. In addition, three counties to our east, (Lawrence, Clay, and Randolph), have no obstetrical and no home visiting services. This leaves a huge swath of our region (seven counties, 4,385 sq. miles) as secondary hospital markets without maternity care. Inspired communities foundation is uniquely positioned with the infrastructure, programs. expertise, quality and motivation to help solve this problem.

We live in a maternity care desert, meaning there are no obstetric hospitals or birth centers and no obstetric providers. According to Dr. Zsakeba Henderson, March of Dimes senior vice-president, "Many people don't know that we are in a maternal and infant health crisis in our country. Our country is currently the least safe to give birth and be born in among the industrialized countries, and ... part of that problem is not having access to high quality maternity care. We have failed moms and babies too long in our country, and we need to act now to improve this crisis."

One of the counties which Inspired Communities Foundation serves and in which we live, Stone County, has an infant death rate (14.7) that ranks 75th of 75 counties in a state that ranks 47th of 50 (Mortality in the United States-National Center for Health Statistics 2020). If Stone county were a country it would rank just behind Syria at 123rd in the world. (World Atlas). Two more of the counties the ICF serves have above the US average (5.42) in Infant mortality - IZard 8.9, Sharp 6.3 with Fulton at 3.6. (Mortality in the United States-National Center for Health Statistics 2020).

Families and women with high-risk pregnancies need high-risk care.

OUR APPROACH

The Healthy Families America program we offer begins with a comprehensive assessment of all the issues, support or lack of support, medical and economic issues impacting the family. In one case, a young family was living without electricity, transportation or water, and the father would hitch-hike each day to his job. The HFA program enabled us to work with the family to find ways they could solve their problems and enable the children to thrive. This story had a happy ending.

Dr. Henderson from the March of Dimes also stated, “We also know that improving the social and economic conditions and quality of healthcare at all stages in a woman’s life will help mitigate some of the issues of access to maternity care, because how healthy a woman is before pregnancy impacts how well she does and what complications she may have and the health of that baby from pregnancy.”

Our own Department of Health has concluded that the Healthy Families America program is very effective. We believe that a broad approach is the most effective and efficient helping families solve problems and creating a family that encourages the child to thrive. This is especially true for families with multiple risk factors. “In a retrospective case-control study that evaluated a project of intensive home visiting following the Nurse Family Partnership and Healthy Families America models, they found that infants whose families did not participate were 2.5 times more likely to die compared to those whose families participated” (from Data to Action, A Background Paper on Infant Mortality, Arkansas Department of Health, March 2012).

As noted earlier, the Inspired Communities Foundation offers the Parents as Teachers (PAT) and Healthy Families America programs (HFA). Both programs are proven and effective and have a lasting impact upon young lives. The approach of both programs, however, is different, The PAT program is geared to enhancing child development, while the HFA program is broader and encompasses the total environment of the family. HFA is a very comprehensive approach and is the best choice for families with multiple risk factors. In counties where only PAT is available, the population will benefit greatly from participation.

Our experience however, has been that the HFA model is better suited to deal with the many social and economic barriers, and broader family issues which contribute to high-risk pregnancies. However, the proposed Maternal 360 reimbursement system, would steer services toward PAT even though it may not be the best program for the baby and family. Our Director Amy Jo Grissom notes that under the guidelines we have been provided, the PAT program will also cost the state more, have fewer visits with families, and emphasize enhancing child development instead of assisting the family in broader issues that affect pregnancies and children’s health. Again, the PAT program is a wonderfully effective child development program that will benefit mothers and babies, but if HFA is available it is usually the best fit in high-risk families.

ISSUES

High Need Secondary Markets

All of the counties served by the Inspired Communities Foundation are secondary hospital markets. It is logical to assume that the hospitals will seek to establish services through Maternal 360 in their primary markets first. This may result in the secondary markets receiving inadequate resources in the face of compelling needs. Establishing staff at the hospital and offering services in the primary hospital market

will probably not leave enough resources for the secondary markets. The hospitals do not have guidelines of how much should be shared with the home visiting agencies. This can create disparities and inadequate resources, especially in secondary markets where the need is highest. The hospitals will want to serve their primary market first since that is their community base with the people they see at the supermarket and the country club.

The funding model proposed by Maternal 360 looks at the problem through the lens of the individual hospital and this is a very logical position. However is it easy to see that the Maternity Care Desert in North Central Arkansas and third world type infant death rates needs a regional approach.

Response:

DHS recognizes the troubling issues Arkansas has with maternal and infant morbidity and mortality. Our deep concern over the health problems that too many mothers and babies face in our state is at the core of the creation of Maternal Life360 HOMEs. We also admire the work of HFA and PAT and hope both models will be part of making Maternal Life360 HOMEs successful.

We are also concerned about the areas of the state that lack birthing hospitals and OB/GYNs. While DHS has limited ability to address those specific issues directly, we believe Life360 HOMEs can spread pre and postnatal home visiting to these "maternity care deserts." We hope and anticipate that hospitals that choose to become Maternal Life360 HOMEs will provide home visiting services in counties beyond their typical service footprint. We fully agree with Dr. Henderson that "improving the social and economic conditions and quality of healthcare at all stages in a woman's life will help mitigate some of the issues of access to maternity care," We hope our Maternal Life360 HOME program contributes to making those improvements.

We understand the concern around the amount of funding Life360 HOMEs will share with their chosen partner organizations. While we have no requirements around that issue, we anticipate it will be negotiated between the hospital and its partner to the satisfaction of both parties.

Comment: Reimbursement Issues

Start-up costs

Our understanding is that there will be two startup payments to the hospitals of \$50,000 each with a negotiated share going to the home visiting programs plus \$300.00 per month per family enrolled. Our cost to establish a home visitor is about \$45,000 per year. This does not include the necessary indirect costs of rent, utilities, affiliate fees, accounting fees, office supplies, internet cost, or postage. This means that about half of the startup payments going to the hospital would be need to be shared with the home visiting agency for one home visitor. Again, if the hospital establishes a relationship with a home visiting agency in their primary market and retains (as it should) funding to offset their own costs, little or nothing will be left for other Arkansas counties with third world infant death statistics.

Response:

We understand the concern around the amount of funding Life360 HOMEs will share with their chose partner organizations. While we have no requirements around that issue, we anticipate it will be negotiated between the hospital and its partner to the satisfaction of both parties.

We also expect start-up funding to be used to recruit and employ staffing for the Life360 HOME program, including home visitors. Our Life360 application process requires hospitals to pass a readiness review before they can begin serving clients. That means the first round of start-up funding must be used to employ staff to be ready to serve clients to pass the readiness review.

Comment: Billing Per Family Per Month

The start-up funding would be offset by the billing per family. However, it takes time (4-12 months) to build up a caseload. The home visitor would also need to leave enough room in their caseload for new families. What happens when the home visitor has reached capacity and cannot accept new patients or risk a violation of HFA or PAT program fidelity?

In a series of e-mails, our director received the following clarification of the proposed \$300 month payment and how it compares against the reimbursement for PAT and HFA.

The \$300 month. Payment is for enrolled families only. In the beginning, when the home visitor is building a caseload and they have 6 families, the reimbursement will only be \$1,800 for that month with a cost of \$4,100.

An average full caseload for Healthy Families America is 15 families seen weekly. An average full caseload for Parents as Teachers is 20 families seen twice monthly. If we choose to use the HFA program (which is the best program for families with risk factors), the total will be \$54,000 per year for a home visitor with a full caseload, who is completing 60 visits per month. On the other hand, if we choose to use the PAT program, the total will be \$72,000 for a home visitor with a full caseload, who is completing 40 visits per month.

Reimbursement at \$300 per month per family:

Maximum caseload

HFA 15 Families (60 visits month) \$54,000 yr.

PAT 20 Families (40 visits month) \$72,000 yr.

A more reasonable case load is 80 to 90 per cent. This is how the funding would work at an 80 per cent caseload.

80 per cent caseload

HFA 12 Families (60 visits mo.) \$43,200 yr.

PAT 16 Families (40 visits mo.) \$57,600 yr.

After the home visitors are established beyond the start-up period, the total cost to maintain a home visitor is about \$55,000 per year. The reimbursement for the best program for high-risk pregnancies and families (HFA) is inadequate.

Our understanding is that we can choose which program to use. From a financial and efficiency standpoint, the PAT program would seem to be the obvious choice, but perhaps not the best choice for all families where HFA is also offered. Assuming a cost of about \$50,000 per year to maintain a home visitor, and a caseload at 80 percent would not cover costs.

Travel

The budget of \$50,000 for travel is excessive. About \$40,000 could go to people and infrastructure and still be adequate.

Response:

DHS expect start-up funding to be used to recruit and employ staffing for the Life360 HOME program, including home visitors. Our Life360 application process requires hospitals to pass a readiness review before they can begin serving clients. That means the first round of start-up funding must be used to employ staff to be ready to serve clients to pass the readiness review. Passing readiness review will trigger a second round of start-up funding which can be used to support staff salaries while home visitors are building their caseloads.

DHS acknowledges that there are different costs for each home visiting model and that may make the use of some models more financially viable than others. We encourage hospitals to consider using a mix of models, where possible, to ensure the funding can best serve the diverse needs of the mothers and babies in their communities.

Comment: WHAT CAN BE DONE

Place Resources in Areas of Great Need

With the grievous state of infant health in some of our counties, the Maternal Care Deserts in Arkansas represent a compelling need. These high-need, under-resourced areas need more home visitors who bring positive changes. It is suggested that the Maternal Care Deserts be designated as under-resourced and receive additional funding for maternal services and home visitors.

It may be tempting to assume that a home visitor could be based in the hospitals primary market community but also serve the secondary markets of four other counties. We see several problems with this approach. The home visitor will fill their caseload with the families that are closer to home. Also, long distances tie up valuable time, and coordination of services over a five-county area is extremely difficult and time consuming.

Also, the HFA program is geared for county level activities. For instance, Group Meetings (required by HFA) simply will not be attended if the distance is more than a few dozen miles (assuming the families have transportation). Over distances that could be over 100 miles between visits and with all the

activities that surround each visit, the more geographically spread out the caseload, the smaller the caseload will be. Time spent traveling is time not spent with a family. It is not just a question of travel money, it is the complications, complexity and time that would accompany the effort to get the family to the resources and the resources to the family.

We propose enough HFA home visitor funding to provide:

Two additional HFA home visitors in Stone County.

Two HFA home visitors in each of Clay, Randolph, and Lawrence Counties (currently with no home visiting infrastructure).

One additional HFA home visitor in Izard County.

One additional HFA home visitor in Sharp County.

A registered nurse to oversee the relationship with the hospital/providers and integrate the healthy habits and behaviors program and HFA health issues into the fabric of our communities.

Another important issue is to provide funding for small hospitals for maternal services. Stone County has a good hospital as part of the White River Hospital System. The problem is that there are economic barriers for small hospitals to offer maternity services or to become birthing hospitals. Perhaps there are ways in which some additional services could be offered through better reimbursement and strategic relationships with high-risk pregnancy resources.

Expand Medicaid Postpartum Coverage

The state of Arkansas can expand the Medicaid postpartum coverage period from 60 days to 12 months, an option made available by the American rescue Plan Act of 2021. Two dozen states and Washington, D.C., have done this as of August.

The fact that a county in Arkansas has three times the national average of infant deaths, is a stain on the health of our children.

But, it is a problem that can be solved. If the Maternal 360 Program places resources in areas of great need instead of taking a "One size fits all" approach, we can begin to slowly address the issues creating poor outcome for our most vulnerable babies and families.

Arkansas has some of the best minds, best technology and the most passionate and caring people in the world. We can solve this problem. It is a matter of finding the best way to match high-risk resources with the needs of high-risk families.

Inspired Communities Foundation is uniquely positioned with the infrastructure, knowledge, experience, geographic presence, and passion to serve and let the babies live.

Response:

DHS is similarly concerned about the areas of the state considered maternity care deserts, and while we have limited ability to address those specific issues directly, we believe Life360 HOMEs can spread pre- and postnatal home visiting to these regions. The Life360 HOME provider manual does not limit the number of counties around the hospital's home county

that can be included in the Life360 service area. As part of the application process, DHS will assess whether the applicant hospital can serve the selected service area adequately or it needs to be adjusted. We will encourage hospitals that choose to become Maternal Life360 HOMEs to provide home visiting services in counties beyond their typical service footprint.

While the Maternal Life360 HOMEs are statutorily required to be birthing hospitals, we do not require that home visitors themselves must be based in the hospitals. In fact, we hope and anticipate home visitors will be based in their home counties, so they understand the needs and available resources of their community.

We also hope that the Maternal Life360 HOMEs will see the value and financial viability of serving counties considered maternity care deserts. Because Maternal Life360 HOMEs can serve both ARHOME enrollees and women enrolled in other Medicaid programs, we believe there will be enough families to serve in these traditionally underserved areas to support events (like group meetings) locally.

DHS understands the interest in expanding Medicaid eligibility to women from 60 days postpartum to 12 months. Although that provision is outside the parameters of the Life360 program, it should be noted that the Maternal Life360 HOME will allow ARHOME enrollees to continue receiving the Life360 home visiting services even if they lose Medicaid eligibility.

Bo Ryall, President & CEO

Arkansas Hospital Association

Comment: The Arkansas Hospital Association (AHA) is a membership organization that proudly represents more than one hundred healthcare facilities and their more than 50,000 employees as they care for all residents of our rural state. Hospital doors are always open, and during the pandemic our hospitals have provided health services to the thousands of Arkansans seeking care for COVID-19, while also acting as essential partners in public health's pandemic response effort. The Association works to support, safeguard, and assist our members in providing safe, high-quality, patient-centered care in a rapidly evolving – and highly regulated – healthcare environment.

The AHA sincerely appreciates the opportunity to comment on Arkansas's Life360 HOME Program proposed rule. Arkansas hospitals are not only the backbone of the Arkansas healthcare system through the delivery of emergency services, inpatient care, and outpatient care – hospitals are also already key components to the health of the communities where they serve. Hospitals fully recognize the importance of social, environmental, and behavioral factors as well as genetic and health care factors that impact a person's health. The AHA applauds the State for developing an innovative approach to fostering community health. Funding hospitals that volunteer to serve as "Life360 HOMEs" to identify and connect beneficiaries to social services, including integrating these services into their care delivery models, encouraging partnerships with community-based organizations, tracking social needs, and incentivizing a more holistic approach, has the potential to truly benefit those most in need in our state.

The success of the Life360 program depends on its ability to enroll interested hospitals and to support the provision of the enhanced services unique to the model. AHA has serious concerns that the proposed fee structure is insufficient to fulfill either. For example, the largest of the Life360

programs, the Maternal Life360 HOME, has evidence-based home visiting as an essential component of the model. However, an analysis from one such program suggests that start up funds should be at least 50% higher (\$150,000 versus \$100,000) and per-member-per-month rates double those proposed (\$600 vs. \$300), based on known program expenses. While some hospitals may take a chance on the model, most will be very hesitant to participate in a program that does not cover their costs – especially at a time when reimbursements for traditional, acute-care hospital services are not keeping pace with increased costs of labor and supplies. We encourage the State to invest more financial resources into the program to promote its success.

Thank you, again, for the opportunity to comment on the Arkansas Life360 HOME Program proposed rule. The Arkansas Hospital Association and its members are offering these comments in a spirit of collaboration with the goal of successful and timely implementation of this innovative program. We stand ready to work with the State and other stakeholders to address the issue raised in our letter and to ensure the program's overall success for Arkansas's hospitals and, most importantly, the patients and families that our hospitals are so honored to serve.

Response:

DHS appreciates the interest in and enthusiasm for the development of the Life360 HOME program and values the partnership with the state's hospitals and the Arkansas Hospital Association in this endeavor.

DHS acknowledges the different costs for each home visiting model that may make the use of some models more financially viable than others. We encourage hospitals to consider using a mix of models, where possible, to ensure the funding can best serve the diverse needs of the mothers and babies in their communities.

DHS continues to gather information on what would be an appropriate per member per month payment rate for Maternal Life360 HOMEs. We will publish a final rate sheet prior to program implementation.

Brittany McAllister

National Service Office for Nurse, Family, Partnership and Child First

Public hearing held remotely on October 20, 2022, at 10:00 a.m.

Comment: Thank you and good morning. My name is Brittany McAllister. I'm with National Service Office for Nurse, Family, Partnership and Child First. I would like to thank the Department and the Administration for recognizing value at home based visiting models, especially evidence-based models like nurse, family partnership is an evidence-based home visiting models with over forty-five years of research, showing that it produces improvements in maternal and child health and development both over the short and long term. N.F.P. utilize registered nurses work with low-income moms from as early in their pregnancy as possible until their first child turns two years old. The nurses provide the trusted expertise. The moms need to have a healthy pregnancy to become a nurturing mother and parent a healthy child. We're grateful for the opportunity to provide comments and support of the effort to cover evidence based on visiting services through maternal life. We do, however, have concerns about implementation, and ultimately, then the success of the program. If the startup funding and per member per month rate are insufficient for working hospitals to provide services to the women in their

community. Evidence based models remain the gold standard and the home visiting field because they have staff providing on going technical assistance to ensure that the program is implemented with fidelity. That is in the way that will produce the same outcomes that the research has shown. This requires both upfront and ongoing training fees. Additionally, models like N.F.P., that utilize registered nurses must offer market-based salaries in order to compete in today's health care workforce landscape. Recently Alabama Medicaid began offering a seven hundred and twenty dollar per member per month rate to ensure adequate cost coverage for this programming and the seen tremendous interest and rapid by partners in various areas of the State. We suggest that in Arkansas per member per month rate of between six hundred and seven hundred and twenty per month, dependent on birthing hospital budgets, area cost of living and evidence-based model requirement would be an appropriate target range for this program. We also know that is may be beyond the purview of this particular set of rules that we encourage DMS to explore ways to provide a full two-years postpartum and funding for women on all categories and Medicaid assistance. N.F.P, provided services for those first two years because the evidence has shown that this timing is what is needed the most robust long-term positive outcomes. We're also thankful for the recognition that telehealth should be an accepted modality for these models when necessary. During the COVID 19 pandemic F.T.P. provided shifted to providing telehealth services to keep our clients and their baby safe, while we're now able to see family safely in person when taking the appropriate precautions, telehealth may still be appropriate in some situations and unfortunately, there's no guarantee that a client will have an internet connection or device that support video-based telehealth. N.F.P. nurse recognize the value of in person services, and when not possible, video-based telehealth services that there will be instances where client simply cannot connect to a video-based modality. We would like to request that video-based telehealth be a recommendation rather than a requirement for service delivery reimbursed through Medicaid. We appreciate the continued opportunities to work with DMS and this tremendous effort and are looking forward to ongoing conversations with DMS. For everything, hospitals, and other stakeholders about how we can best serve low-income Arkansas moms within our family partnership. Thank you so much.

Response:

We admire the work of NFP and hope the model will be part of making the Maternal Life360 HOME program successful.

DHS continues to gather information about what an appropriate per member per month payment rate for Maternal Life360 HOMEs would be. We will publish a final rate sheet prior to program implementation.

We also understand the value in ensuring the home visitors serving Maternal Life360 HOME clients have all appropriate training necessary, and we continue to work with our hospital and home visiting partners to determine the best way to fund and deliver it.

DHS also recognizes the value of delivering Maternal Life360 HOME services in person in clients' homes. We also appreciate the commenter's support of our proposed rules allowing for services to be delivered through other means, including video-supported telehealth visits, when necessary. We also recognize many of our clients have limited internet access, and we do not have any plans to require clients to use telehealth services

DHS appreciates commenters' suggestion that Arkansas Medicaid expand postpartum coverage. We continue to explore all available policy options to best serve pregnant women in Arkansas and their families.

Audrey Zavaleta, Executive Director

Family Network NWA

Comment: Our home visitors became almost unable to accomplish what was required by HFA because of families being in such an intense crisis without food, losing their housing, etc.

Our intention with the case manager was to alleviate some of those tasks so our home visitors can focus on the parent-child relationship, child development, goal setting, etc. Our case manager is currently funded by UAMS through their Community Health Worker funding that is a 2 year funding process. I think it would be interesting to talk with the hospitals about the need for this kind of service. It also brought to mind our frequent need for doula services, which ties into maternal care. We often have mothers that have zero support during their labor process, either because they're a single parent, recently immigrated here, or because they don't speak English. We know having a doula present for labor and available postpartum can greatly boost maternal and infant health outcomes around birth.

And finally I'm attaching here a quick breakdown of the home visitor position costs that we at Family Network have on average. *(See table below response)* I broke it down for the first year (with initial training costs, equipment costs) and then following years. I also included a supervisor position. Again, these are costs that we have here at Family Network, so it might vary per agency.

Response:

DHS appreciates the challenging work currently being done by the state's home-visitors to serve families in crisis. We hope to leverage and expand the existing work being done. We also appreciate the partnership of other health professionals in the continuum of care for pregnancy and postpartum care.

We also appreciate the information on home visitation staff positions needed, their salaries and other costs of providing services.

Staff position costs:

Home Visitor: 1 FTE Start up Year

Categories:	Calculated From:	Total Cost:
Annual Salary:	\$16.50 X hour	\$34,320
Benefits (Fringe and Health Insurance Stipend)	\$2,699	\$2,699
Travel Cost Annually 6,500 miles per IRS rate	\$.625	\$4,062
Computer Software		\$750
HV expenses within site (affiliation fees, curriculum fees)		\$923
Training		\$700
		Total Cost: \$43,454

Home Visitor: 1 FTE

Categories:	Calculated From:	Total Cost:
Annual Salary:	\$16.50 X hour	\$34,320
Benefits (Fringe and Health Insurance Stipend)	\$3,899	\$3,899
Travel Cost Annually 6,500 miles per IRS rate	\$.625	\$4,062
Computer Software		\$0
HV expenses within site (affiliation fees, curriculum fees)		\$923
Training		\$0
		Total Cost: \$42,004

Supervisor: 1 FTE First Year

Categories:	Calculated From:	Total Cost:
Annual Salary:	\$18.00 X hour	\$37,440
Benefits (Fringe and Health Insurance Stipend)	\$2,936	\$2,936
Travel Cost Annually 1,000 miles per IRS rate	\$.625	\$625
Computer Software		\$750
HV expenses within site (affiliation fees)		\$524
Training		\$950
		Total Cost: \$43,225

Supervisor : 1 FTE

Categories:	Calculated From:	Total Cost:
Annual Salary:	\$18.00 X hour	\$37,440
Benefits (Fringe and Health Insurance Stipend)	\$2,936	\$2,936
Travel Cost Annually 6,500 miles per IRS rate	\$.625	\$625
Computer Software		\$
HV expenses within site (affiliation fees)		\$524
Training		\$
		Total Cost: \$41,525



Division of Medical Services

P.O. Box 1437, Slot S295, Little Rock, AR 72203-1437

P: 501.682.8292 F: 501.682.1197

MEMORANDUM

TO: Interested Persons and Providers

FROM: Elizabeth Pitman, Director, Division of Medical Services

DATE: October 7, 2022

SUBJ: Life 360 HOME Program

As a part of the Arkansas Administrative Procedure Act process, attached for your review and comment are proposed rule revisions.

Public comments must be submitted in writing at the above address or at the following email address: ORP@dhs.arkansas.gov Please note that public comments submitted in response to this notice are considered public documents. A public comment, including the commenter's name and any personal information contained within the public comment, will be made publicly available and may be seen by various people.

If you have any comments, please submit those comments in writing, no later than November 7, 2022.

All DHS proposed rules, public notices, and recently finalized rules may also be viewed at: [Proposed Rules & Public Notices](#).

State Plan under Title XIX of the Social Security Act
State/Territory: Arkansas

TARGETED CASE MANAGEMENT SERVICES
Maternal Life360

Target Group (42 Code of Federal Regulations 441.18(a)(8)(i) and 441.18(a)(9)):
[Describe target group and any subgroups. If any of the following differs among the subgroups, submit a separate State plan amendment describing case management services furnished; qualifications of case management providers; or methodology under which case management providers will be paid.]

Individuals who are enrolled in an Arkansas Medicaid program other than the ARHOME program and are either pregnant with a high-risk pregnancy OR received TCM services while pregnant with a high-risk pregnancy and delivered the baby within the previous twelve (12) months.

Target group includes individuals transitioning to a community setting. Case-management services will be made available for up to **[insert a number; not to exceed 180]** consecutive days of a covered stay in a medical institution. The target group does not include individuals between ages 22 and 64 who are served in Institutions for Mental Disease or individuals who are inmates of public institutions). (State Medicaid Directors Letter (SMDL), July 25, 2000)

Areas of State in which services will be provided (§1915(g)(1) of the Act):

Entire State

X Only in the following geographic areas: **Areas of the state with a birthing hospital that elects to provide services**

Comparability of services (§§1902(a)(10)(B) and 1915(g)(1))

Services are provided in accordance with §1902(a)(10)(B) of the Act.

X Services are not comparable in amount duration and scope (§1915(g)(1)).

Definition of services (42 CFR 440.169): Targeted case management services are defined as services furnished to assist individuals, eligible under the State Plan, in gaining access to needed medical, social, educational and other services. Targeted Case Management includes the following assistance:

- Comprehensive assessment and periodic reassessment of individual needs, to determine the need for any medical, educational, social or other services. These assessment activities include
 - taking client history;
 - identifying the individual's needs and completing related documentation; and
 - gathering information from other sources such as family members, medical providers, social workers, and educators (if necessary), to form a complete assessment of the eligible individual;

General client assessments will be conducted during each home visit. The frequency of visits will depend on the clients' needs and fidelity to the selected evidence based home visiting model.

Full screens for health-related social needs will be conducted at least every six months.

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State Plan under Title XIX of the Social Security Act
State/Territory: Arkansas

TARGETED CASE MANAGEMENT SERVICES
Maternal Life360

- ❖ Development (and periodic revision) of a specific care plan that is based on the information collected through the assessment that
 - specifies the goals and actions to address the medical, social, educational, and other services needed by the individual;
 - includes activities such as ensuring the active participation of the eligible individual, and working with the individual (or the individual's authorized health care decision maker) and others to develop those goals; and
 - identifies a course of action to respond to the assessed needs of the eligible individual;

- ❖ Referral and related activities (such as scheduling appointments for the individual) to help the eligible individual obtain needed services including
 - activities that help link the individual with medical, social, educational providers, or other programs and services that are capable of providing needed services to address identified needs and achieve goals specified in the care plan; and

- ❖ Monitoring and follow-up activities:
 - activities and contacts that are necessary to ensure the care plan is implemented and adequately addresses the eligible individual's needs, and which may be with the individual, family members, service providers, or other entities or individuals and conducted as frequently as necessary, and including at least one annual monitoring, to determine whether the following conditions are met:
 - services are being furnished in accordance with the individual's care plan;
 - services in the care plan are adequate; and
 - changes in the needs or status of the individual are reflected in the care plan. Monitoring and follow-up activities include making necessary adjustments in the care plan and service arrangements with providers.

DHS will audit a sample of care plans on a quarterly basis to ensure activities, contacts, services furnished, and care plan adjustments are being documented as required.

X Case management includes contacts with non-eligible individuals that are directly related to identifying the eligible individual's needs and care, for the purposes of helping the eligible individual access services; identifying needs and supports to assist the eligible individual in obtaining services; providing case managers with useful feedback, and alerting case managers to changes in the eligible individual's needs.
(42 CFR 440.169(e))

Qualifications of providers (42 CFR 441.18(a)(8)(v) and 42 CFR 441.18(b)):

An entity is eligible to be a TCM provider if it is a current Arkansas Medicaid hospital provider is licensed as a general hospital, and has an obstetrics unit.

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State Plan under Title XIX of the Social Security Act
State/Territory: Arkansas

TARGETED CASE MANAGEMENT SERVICES
Maternal Life360

The TCM provider or the organization with which the TCM provider contracts to provide home-visiting services and supports must use an evidence-based home visitation model. The selected model(s) must cover home visiting services from pregnancy through at least the first two (2) years of the baby's life.

Freedom of choice (42 CFR 441.18(a)(1)):

The State assures that the provision of case management services will not restrict an individual's free choice of providers in violation of section 1902(a)(23) of the Act.

1. Eligible individuals will have free choice of any qualified Medicaid provider within the specified geographic area identified in this plan.
2. Eligible individuals will have free choice of any qualified Medicaid providers of other medical care under the plan.

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State Plan under Title XIX of the Social Security Act
State/Territory: Arkansas

TARGETED CASE MANAGEMENT SERVICES
Maternal Life360

Freedom of Choice Exception (§1915(g)(1) and 42 CFR 441.18(b)):

Target group consists of eligible individuals with developmental disabilities or with chronic mental illness. Providers are limited to qualified Medicaid providers of case management services capable of ensuring that individuals with developmental disabilities or with chronic mental illness receive needed services:

Access to Services (42 CFR 441.18(a)(2), 42 CFR 441.18(a)(3), 42 CFR 441.18(a)(6)):
The State assures the following:

- Case management (including targeted case management) services will not be used to restrict an individual's access to other services under the plan.
- Individuals will not be compelled to receive case management services, condition receipt of case management (or targeted case management) services on the receipt of other Medicaid services, or condition receipt of other Medicaid services on receipt of case management (or targeted case management) services; and
- Providers of case management services do not exercise the agency's authority to authorize or deny the provision of other services under the plan.

Payment (42 CFR 441.18(a)(4)):

Payment for case management or targeted case management services under the plan does not duplicate payments made to public agencies or private entities under other program authorities for this same purpose.

Case Records (42 CFR 441.18(a)(7)):

Providers maintain case records that document for all individuals receiving case management as follows: (i) The name of the individual; (ii) The dates of the case management services; (iii) The name of the provider agency (if relevant) and the person providing the case management service; (iv) The nature, content, units of the case management services received and whether goals specified in the care plan have been achieved; (v) Whether the individual has declined services in the care plan; (vi) The need for, and occurrences of, coordination with other case managers; (vii) A timeline for obtaining needed services; (viii) A timeline for reevaluation of the plan.

Limitations:

Case management does not include, and Federal Financial Participation (FFP) is not available in expenditures for, services defined in §440.169 when the case management activities are an integral and inseparable component of another covered Medicaid service (State Medicaid Manual (SMM) 4302.F).

Case management does not include, and Federal Financial Participation (FFP) is not available in expenditures for, services defined in §440.169 when the case management activities constitute the direct delivery of underlying medical, educational, social, or other services to which an eligible individual has been referred, including for foster care programs, services such as, but not limited to, the following: research gathering and completion of documentation required by the foster care program; assessing adoption

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State Plan under Title XIX of the Social Security Act
State/Territory: Arkansas

TARGETED CASE MANAGEMENT SERVICES
Maternal Life360

placements; recruiting or interviewing potential foster care parents; serving legal papers; home investigations; providing transportation; administering foster care subsidies; making placement arrangements. (42 CFR 441.18(c))

FFP only is available for case management services or targeted case management services if there are no other third parties liable to pay for such services, including as reimbursement under a medical, social, educational, or other program except for case management that is included in an individualized education program or individualized family service plan consistent with §1903(c) of the Act. (§§1902(a)(25) and 1905(c))

[Specify any additional limitations.]

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TOC required**200.000 LIFE360 HOMES GENERAL INFORMATION****201.000 Arkansas Medicaid Life360 HOMEs Overview****1-1-23**

This provider manual (manual) offers guidance for eligible Arkansas Medicaid-enrolled hospitals to enroll as a Life360 HOME provider (Life360). The Life360 will ensure clients in target populations are connected to medical services and nonmedical supports in their communities to address their health-related social needs (HRSN) through intensive care coordination. Life360s are designed to supplement not supplant existing supports and services. Medical care will continue to be delivered and billed as it is today. There are three types of Life360s that will target populations to receive intensive care coordination services and supports specifically designed to meet those populations' unique needs (Life360 refers to all three types unless otherwise specified):

- A. **Maternal Life360** will support women whose Medicaid or Medicaid-funded Qualified Health Plan (QHP) claims reflect a diagnosis code of needing supervision for high-risk pregnancy. They will be supported either through direct provision of evidence-based maternal and child home visitation or through contract with evidence-based home visitation programs.
- B. **Rural Life360** will support individuals with mental illness as defined in this manual or substance use disorder (SUD) who live in rural areas of the state by providing intensive care coordination through care coordination coaches.
- C. **Success Life360** will support young adults most at risk of long-term poverty and associated poor health outcomes due to prior incarceration, involvement with the foster care system, or involvement with the juvenile justice system and young adult veterans who are at high-risk of homelessness. The Success Life360 will provide intensive care coordination directly or contract with community organizations to do so.

201.100 Life360 Provider Eligibility**1-1-23**

To be eligible to apply for enrollment as a Life360 provider with Arkansas Medicaid, the entity must:

- A. Be a current Arkansas Medicaid hospital provider.
 - 1. Maternal Life360 must be a birthing hospital as defined within this manual.
 - 2. Rural Life360 must be a small rural hospital as defined within this manual.
 - 3. Success Life360 must be an acute care hospital as defined within this manual.

203.000 APPLICATION AND APPROVAL PROCESS**203.100 Letter of Intent****1-1-23**

The approval to be a Life360 happens in a four-phase process. The process is designed to ensure that eligible providers demonstrate capacity and ability to implement the program requirements outlined in this manual to achieve the goals and outcomes of the Life360 program.

Submitting all required information in the application process does not guarantee approval as a Life360. The Arkansas Department of Human Services (DHS) Division of Medical Services (DMS) will review and determine whether approval is warranted for all applicants.

To become an approved Life360, a hospital must first submit a letter of intent (LOI) to DMS that includes:

- A. The type(s) of Life360 the hospital is applying to become;
- B. Hospital location, Medicaid provider ID, and proposed service area (counties to be served); and
- C. Name and contact information for staff member serving as program lead.
- D. For a **Maternal Life360**, the LOI must include
 1. Estimated number of individuals the hospital expects to serve with home-visiting supports and services in the proposed service area and a description of how the hospital arrived at that estimate. (Indicators could include local birth rates, number of child-bearing age women in poverty, Medicaid enrollment or healthcare access, and other HRSN needs and health outcomes);
 2. Number of women receiving maternity or obstetric services annually through the hospital and/or its clinics (note: "hospital" in this section means the hospital submitting the LOI);
 3. The name of the evidence-based home visiting model(s) the hospital intends to use;
 4. Whether the hospital will use its own staff to conduct home-visiting OR contract with an external organization to provide home-visiting; and
 5. If contracting with an external organization(s), name, and contact information of organization(s).
- E. For a **Rural Life360**, the LOI must include:
 1. Estimated number of adults in the service area with mental illness and/or substance use disorder the hospital expects to serve and a description of how the hospital arrived at that estimate.
 2. Estimated number of adults in the proposed service area likely to be eligible due to mental illness and/or substance use disorder;
 3. Brief description of the mental health and substance use disorder services provided by the hospital or its clinics;
 4. Names of behavioral health service providers in the proposed service area and brief description of services and/or supports they could provide to Life360 clients; and
 5. Number of acute crisis unit beds the hospital currently operates or will develop.
- F. For a **Success Life360**, the LOI must include:
 1. Names of community service organizations currently serving the employment, educational, or training needs of the proposed service area and the estimated number served by the programs, if available;
 2. Estimated number of adults in the proposed service area likely to be eligible for Success Life360;
 3. Identification of community partner organizations, if using

DMS will review the LOI to determine if the hospital meets the eligibility criteria and provided all requested information. DMS reserves the right to refuse an LOI if necessary to allow time to process Life360 applications previously submitted. DMS will inform the hospital either:

- A. The LOI is approved, and the hospital may move to the application phase;

- B. More information is needed before approval can be made; or
- C. The hospital does not meet the criteria outlined in this manual to move forward to application, for reasons including but not limited to proposing to serve too few clients or proposing a service area that is already adequately being served by other Life360s.

203.200 Application**1-1-23**

Upon approval of the LOI, the hospital will submit a Life360 application within ninety (90) calendar days. The application must include:

- A. A program narrative that describes:
 - 1. How intensive care coordination will be designed and delivered according to requirements in this manual;
 - 2. Staff and organizational experience;
 - 3. Subcontractor experience, if applicable; and
 - 4. Description of community partners
- B. A community network assessment (template provided) (see section 203.210 for more details);
- C. A copy of the hospital's most recent Community Needs Analysis (if available);
- D. At least two letters of support from potential community partner organizations;
- E. Plan for community outreach, education, and client communication;
- F. How services will supplement, not supplant, services already provided in the community;
- G. Description of proposed referral network and signed agreements with community partner organization, pending approval of the Life360 application (See section 203.210);
- H. Plan for monitoring client milestones and goals, collecting data on client outcomes, and monitoring other quality improvement measures identified by DMS; and
- I. Startup and first-year program budget and narrative justification
- J. Proposed screening tool(s) and a description of the screening processes

DMS will review the hospital's application and materials upon receipt of a complete application package and will respond within a specified timeframe in writing to approve, deny, or request additional information. If additional information is needed, the applicant hospital will have thirty (30) calendar days to provide the additional information. DMS will review and approve or deny any application within a specified timeframe.

The following sections 203.210-203.230 provide criteria for each application requirement.

203.210 Community Network Assessment and Capacity Building**1-1-23**

As part of the application, the hospital will:

- A. Complete an assessment of the service area population demographics and a community resource inventory to determine the available community resources and gaps. That inventory should include community medical providers, community service organizations, and social service providers that to whom the Life360 can refer clients to access appropriate services and supports.

1. Once a hospital becomes a Life360, the hospital will update this information annually as a requirement of the annual Life360 HOME agreement and will be responsible for ongoing program and resource development.
 2. Access to medical services and availability of non-medical supports should be described (i.e., number of primary care/specialists, number of organizations providing supports and type of supports, data on wait times or distance to care, if available).
- B. Identify providers and others in the service area who can serve as a referral network to refer someone for Life360 services.
1. Referrals can be from a diverse array of health and social service organizations, medical providers, and non-medical supports in the community through formal and informal agreements and based on the target population served.
 2. Determine which organizations will require formal community partner agreements, particularly an entity that would share personal client information, to ensure health information is protected. Applicant hospital will submit those agreements as part of the application, and DMS will review them as part of the application and/or readiness review process.

203.220 Referral Network Outreach

1-1-23

After application approval, the selected applicant and its partners will be responsible for community outreach to ensure entities that can make referrals are aware of Life360 services and the referral process, for general outreach and awareness activities directed at the target population as well as key community groups that would have direct contact with and are trusted by the Life360 target population.

203.230 Community Partner Organization Criteria

1-1-23

To be eligible to contract with a Life360 hospital to provide intensive care coordination services, an organization must meet the qualifications for the relevant Life360 type, as described below. Hospitals are responsible for confirming the organization has a tax identification number, is in good standing with relevant government entities, and other due diligence of partner organizations. Community partner organizations will work with the Life360s to conduct outreach to ensure providers and local entities are aware that they can refer clients for services.

- A. **Maternal Life360** - The Life360 or the organization with which the Life360 contracts to provide home-visiting services and supports must use an evidence-based maternal and child home visitation model. The selected model(s) must cover home visiting services from pregnancy through at least the first two (2) years of the baby's life.
- B. **Success Life360** - The organization with which the Life360 contracts must be experienced in working with young adults most at risk of long-term poverty to build their skills to be physically, socially, and emotionally healthy in order to live in and contribute to their communities.

This section criteria does **not** apply to **Rural Life360**. Hospitals will directly provide intensive care coordination to the target population. Providers of behavioral health services will be engaged by the hospital as key partners for referrals and delivery of services.

203.300 Startup

1-1-23

Once an application is approved, the selected applicant must sign a startup agreement before DMS will release the first round of startup funding. For information about the amount of startup funding allowed, see the rate sheet. After the agreement is signed the selected applicant will be in the startup phase, and DMS will release the first installment of startup funds. The hospital must follow the startup plan and budget outlined in the approved application. Hospitals may not

receive more than one package of startup funding for more than one application of the same type of Life360s.

For both **Maternal Life360s** and **Rural Life360s**, startup funds will be:

- A. Provided in two initial payments to be used for the cost of starting the program.
 - 1. The first upon DMS approval of the application
 - 2. The second after successful completion of the readiness review
- B. Based on the approved program budget and contained in the startup agreement.
- C. Allowed to cover the cost of staff, equipment, and supports identified in the selected applicant's startup budget or otherwise approved by DMS. Expenditures will be subject to audit.

For **Success Life360s**, startup funds will be:

- A. Provided in three initial payments to be used for the cost of starting up the program.
 - 1. The first upon DMS approval of the application and signed startup agreement
 - 2. The second after successful completion of the readiness review
 - 3. The third payment will be released by DMS in accordance with the selected applicant's approved startup agreement
- B. Based on the approved annual program budget contained in the startup agreement.
- C. Allowed to cover the cost of staff, equipment, and supports identified in the applicant's startup plan budget or other uses approved by DMS. Expenditures will be subject to audit.

Each selected applicant must complete the startup phase within the timeframe specified in its startup plan, not to exceed one-hundred-eighty (180) days from the receipt of startup funds, or funds may be subject to recoupment. During the startup phase, DMS and the hospital working to become a Life360 will meet monthly to assess progress toward readiness review. DMS will schedule readiness review at the end of the startup phase.

203.400 Readiness Review

1-1-23

After approval of the application and completion of the startup phase, a readiness review will be conducted by DMS or its contractor to determine the selected applicant's readiness to fully implement the Life360 program. Readiness review will include an onsite visit to each location. Each selected applicant will demonstrate that it is operationally ready to fulfill all Life360 requirements including:

- A. Having the ability to submit enrollment requests to DHS and accept results of client eligibility verification
- B. Having the ability to report required data to DMS in the format requested
- C. Having an HRSN screening tool and the necessary staff training to administer it, a platform for capturing results, and a process for linking clients to resources
- D. Providing Any other client assessment tools to be used by the program
- E. Having a person-centered action plan (PCAP) template and plan for updating the PCAP regularly, at a minimum annually
- F. Having adequate program staff and appropriate staff training
- G. Having Fully executed community partner agreements

- H. Having a referral network, agreements, and a process for accepting and transferring protected health information
- I. Demonstrating that the Life360 and its partners have a communication, outreach, and referral plan
- J. Having fund controls to correctly submit payment for Life360 funding that is separate from medical services paid for by Medicaid, Medicare, other insurance, and any other third-party payer
- K. Having an operational acute crisis bed(s), for Rural Life360 only

DMS will schedule the readiness review within five (5) business days after being notified by the selected applicant that it is ready to complete the review. DMS will complete readiness review and provide the outcome of the review in writing within a specified timeframe of the onsite visit. Following the completion of the readiness review, DMS will either:

- A. Enroll the hospital as a Life360 provider, enter into the Life360 HOME agreement, and release the second installment of startup funds;
- B. Release all or a portion of the second installment of startup funds and provide in writing a list of deficiencies and the timeframe by which the deficiencies must be addressed for the hospital to demonstrate readiness; or
- C. Deny enrollment as a Life360 for failure to successfully complete readiness review.

203.500 Life360 HOME Agreement

1-1-23

To enroll in the Life360 program, applicants that successfully complete the application process and readiness review will provide their tax ID number and enter into the Life360 HOME agreement. The agreement will outline required program obligations and legal requirements pertaining to the Life360 scope of work. Through execution of the agreement, providers agree to adhere to all requirements in this manual and all applicable federal regulations and state statutes.

203.700 Electronic Signatures

1-1-23

Medicaid will accept electronic signatures, provided the electronic signatures comply with Arkansas Code § 25-31-103 et seq.

210.000 PROGRAM REQUIREMENTS

210.100 Client Eligibility

1-1-23

Life360 client participation is voluntary. An individual is not required or entitled to receive services from a Life360 as a condition of Medicaid eligibility. To be screened for HRSN and/or Life360 eligibility, clients must live in the service area served by the Life360. Residence can be determined by the person's geographic residence, shelter residence or other temporary residence, such as a health facility. If experiencing homelessness, residence may be established by the last documented residence or shelter, work history/place of employment, or child's school/childcare enrollment.

A client may be enrolled in only one Life360 program at any time.

A client who moves from one Life360 service area to another may continue receiving services through the new Life360 if the new Life360 type is the same as the previous (e.g., Maternal to Maternal). If the Life360 type in the new service area is different, the client may receive services from the new Life360 only if the client qualifies for those services.

Additional eligibility requirements by Life360 type include:

- A. A woman is eligible for **Maternal Life360** intensive care coordination supports if she:
1. Is enrolled in Arkansas Medicaid or was enrolled in Arkansas Medicaid when she began receiving Maternal Life360 services and is either pregnant with a high-risk pregnancy (a diagnosis of needing supervision for high-risk pregnancy. High-risk pregnancy must be verified through a completed referral form from the client's physician that includes the most current clinical note.) OR
 2. If enrolled in ARHOME at any point during enrollment in the Maternal Life360 program, was enrolled in the Maternal Life360 while pregnant with a high-risk pregnancy and delivered the baby within the previous twenty-four (24) months OR If enrolled in a Medicaid program that is not ARHOME for the full duration of enrollment in the Maternal Life360 program, was enrolled in the Maternal Life360 while pregnant with a high-risk pregnancy and delivered the baby within the previous twelve (12) months.
 3. Is not currently receiving state- or federally funded home visiting services through a provider whose services cover pregnancy or the first two (2) years of a baby's life.
- B. An individual who needs assistance confirming a high-risk pregnancy diagnosis will be eligible for assistance in connecting with medical services until the need for supervision for high-risk pregnancy is confirmed. The Life360 HOME will not receive per member per month (PMPM) funding until the woman's pregnancy and eligibility for the program are confirmed.
- C. All adults living in the **Rural Life360** service area are eligible for HRSN screening and referrals to needed community supports. To be eligible for intensive care coordination, the individual also must:
1. Be enrolled in ARHOME (through a qualified health plan [QHP] or Medicaid fee-for-service [FFS];
 2. Have a mental health and/or substance use disorder diagnosis;
 3. Not be enrolled in the Provider-led Arkansas Shared Services Entity (PASSE) program.
- D. An individual is eligible for **Success Life360** intensive care coordination and supports if the person:
1. Is enrolled in ARHOME (through a QHP or Medicaid FFS);
 2. Is at risk of poor health due to poverty, meaning under one hundred thirty eight percent (138%) Federal poverty level;
 3. Is not enrolled in the Provider-led Arkansas Shared Services Entity (PASSE) program; and
 4. Meets the criteria for at least one of the following categories:
 - a. Is between nineteen (19) and twenty-four (24) years of age and has been previously placed under the supervision of the DHS Division of Youth Services as verified by DHS.
 - b. Is between nineteen (19) and twenty-four (24) years of age and has been previously placed under the supervision of the Arkansas Department of Corrections, as verified by the Arkansas Department of Corrections or DHS.
 - c. Is between nineteen (19) and twenty-seven (27) years of age and has been previously placed under the supervision of the DHS Division of Children and Family Services; as verified by DHS.
 - d. Is between nineteen (19) and thirty (30) years of age and is a veteran verified

by DD214 Certificate or Release of Discharge from Active Duty.

210.200 General Program Requirements

1-1-23

All Life360s must:

- A. Submit an annual budget and budget narrative, including staff, to DMS for approval.
- B. Provide an explanation of how the Life360 will meet targeted number of clients to be served, if you it failed to meet expected numbers in the previous year
- C. Provide service projections (e.g., the number of clients the Life360 expects to serve, the number of visits anticipated for each client, the number of individuals screened, etc.)
- D. Provide all other required supports specified in the Life360 HOME agreement.
- E. Provide or contract to provide supports that demonstrate cultural competency and are provided in the languages frequently spoken by the targeted population as identified in the community assessment.
- F. Comply with all reporting requirements and deadlines specified in the Life360 HOME agreement and any additional reporting requirements required by the Centers for Medicare and Medicaid Services and/or the Arkansas Legislature.
- G. Maintain fund controls to correctly submit payment for Life360 funding that is separate from medical services paid for by Medicaid, Medicare, other insurance, and any other third-party payer.
- H. Provide a monthly expenditure report. The expenditure report must provide all expenditures compared against budgeted categories. Maternal Life360s will provide all program expenditures, but only the expenditures for startup and transportation funding will be compared against budgeted categories. For **Rural** and **Success Life360s**, the monthly expenditure report also must include an estimate of funds the Life360 anticipates will be unspent by the end of the program year. DHS may adjust the annual budget in the middle of the year, if necessary, to bring the Life360's operations in line with actual spending patterns.
- I. For **Rural** and **Success Life360s**, unspent funds will be applied to the Life360's budget for the following year, and DMS will reduce new funds provided by the amount of unspent funds the Life360 is carrying forward. Life360s with unspent funds cannot submit a budget in the subsequent year that exceeds the budget for the year in which the unspent funds accumulated. DMS may make an exception for circumstances that were unique to a particular program year.

210.300 Service Area Criteria

1-1-23

The Life360 may define its service area. The service area must ~~to include only~~ the county in which the Life360 is located and may include one or more counties contiguous to that county or to each other. As part of the application process, DHS will assess whether the applicant hospital can serve the selected service area adequately or it needs to be adjusted.

Rural Life360 service areas may include counties containing a Metropolitan Statistical Area (MSA), but the Life360 must be established to primarily serve the hospital's patient population and non-MSA counties. DHS will assess whether the applicant hospital's selected service area adequately serves rural populations.

Success Life360 service areas must include the county in which the hospital is located and the county in which the community partner organization is located. If the hospital and the community partner organization are in separate counties, the counties must adjoin.

210.400 Required Maternal Life360 Activities**1-1-23**

The **Maternal Life360** will provide directly or through its selected community partner organization(s) the following services and supports for their clients:

- A. Request from DHS enrollment and eligibility verification for individuals referred or identified for home-visiting supports, including assisting individuals with the diagnosis of need for supervision for high-risk pregnancy.
- B. Obtain a signed consent form from clients to participate in the program and to authorize the Life360 HOME to share their personal information with DHS, partner organizations, relevant community service providers, and relevant health care providers.
- C. Administer screenings that includes HRSN screenings (upon client enrollment in Life360 and every six (6) months during program participation) as well as other required health screenings for all eligible clients that will help inform the supports delivered to improve outcomes in:
 - 1. Maternal Health
 - 2. Child Health
 - 3. Family Economic Self-Sufficiency
 - 4. Positive Parenting Practices
- D. Provide home visitation services with fidelity to an evidence-based home visiting model and linkages to community resources and supports. Home visiting may be provided directly by the hospital or through contract with evidence-based home visitation program.
- E. Assist with any needs for coordination of medical services including support identifying and connecting both the client and her baby to a PCP or OB/GYN and any other needed medical and behavioral health providers or culturally relevant supports.
- F. Document home-visiting services provided.
- G. Disenroll individuals who have asked to stop receiving services or who are uncooperative with receiving services after three consecutive attempts to schedule a visit. Disenrolled clients can re-enroll at their request within their pregnancy or, for ARHOME enrollees, within the first twenty-four (24) months after delivery and for participants in any other Medicaid aid category, within the first twelve (12) months after delivery.
- H. Ensure coordination with other home visiting programs as applicable.

210.500 Required Rural Life360 Care Coordination Activities**1-1-23**

The **Rural Life360** will provide the following community screening and referral supports to the general population and care coordination to identified clients.

- A. Create a plan and implement the plan to screen anyone in the community for HRSN needs and provide support for community providers to complete and submit HRSN screens for the people they serve.
- B. Connect individuals whose HRSN screen identifies an HRSN need to local medical and non-medical resources, including food, housing, and transportation.
- C. Accept referrals for care coordination supports for eligible clients from health care providers treating individuals with mental illness or substance use disorder.

The **Rural Life360** will provide the following healthcare capacity building activities:

- A. Develop and operate an acute crisis unit that meets the requirements of 218.400 of the Arkansas Medicaid Hospital Provider Manual or a psychiatric care unit that meets the requirements specified in the Rules for Hospitals and Related Institutions in Arkansas. The ACU or psychiatric unit must serve individuals in need of mental health or substance use crisis services in the Rural Life360 hospital. The Rural Life360 hospital must begin acute crisis unit or psychiatric services within the timeframe approved by DMS.

The Rural Life360 will provide the following care coordination supports:

- A. Request from DHS enrollment and eligibility verification for individuals referred or identified for intensive care coordination supports.
- B. Obtain a signed consent form from clients to participate in the program and to authorize the Life360 HOME to share their personal information with DHS, partner organization, relevant community service providers, and relevant health care providers.
- C. Provide intensive care coordination and coaching supports for enrolled clients. Intensive care coordination and coaching includes:
1. Collecting or completing an HRSN screen upon client enrollment in Life360 and every six (6) months during program participation
 2. Conducting an in-depth personal interview related to the health-related social needs identified in the screening and the barriers to resolving health-related social needs. The Rural Life360 is responsible for developing the interview tool to be used, the implementation process and the staff training process for engaging clients.
 3. Developing and maintaining a person-centered action plan (PCAP) for each client that includes:
 - a. The client's goals and preferences for addressing needs. Goals must include accessing a PCP and all needed medical providers and services. Goals also may include mental and emotional wellness, financial goals, applying for or completing workforce training or education programs, obtaining or maintaining employment, and obtaining or sustaining safe housing.
 - b. Results of the HRSN screen and personal interview including strengths and relevant personal history, for example, criminal justice involvement.
 - c. Plan for overcoming barriers for accessing services and for avoidance of non-emergency ED visits.
 - d. Unmet needs for medical services and non-medical community supports and a plan for meeting those needs.
 4. Working directly with clients and their families to improve their skills to be healthy physically, socially, emotionally and to thrive in their communities. Follow up supports may include the following activities as specified in the PCAP:
 - a. Engaging clients in promoting their own health
 - b. Coordinating with external medical and non-medical providers to connect clients with needed health services and community supports
 - c. Assisting clients with applying for services including scheduling and completing assessments for entry into the PASSE program, if needed
 - d. Assisting clients in obtaining services that reduce preventable utilization of emergency departments and inpatient hospital settings
 - e. Increasing client engagement in educational and employment opportunities and other supports that reduce the risk of poverty
 - f. Transporting clients to non-medical appointments. Life360 funds cannot be used for costs incurred transporting a client or assisting with transportation of a client to a job interview

5. Providing supports through any of the following:
 - a. Home visits in such frequency as is necessary to assist the client meet his/her documented PCAP goals
 - b. Office visits
 - c. Video-supported visits
 - d. Telephone or text message contacts in conjunction with in-person visits
6. Documenting client's progress toward meeting goals established on person-centered action plan, including:
 - a. Weekly update of client and staff activities
 - b. Gaps in available community services
 - c. Responsiveness from client
 - d. Any completed or newly identified goals or unmet needs

210.600 Required Success Life360 Care Coordination Activities**1-1-23**

The Success Life360 will work with its partner organization to provide the following services:

- A. Request from DHS enrollment and eligibility verification for individuals referred or identified for intensive care coordination and supports.
- B. Obtain a signed consent form from client to participate in the program and to authorize the Life360 HOME to share the client's personal information with DHS, partner organizations, relevant community service providers, and relevant healthcare providers.
- C. Provide intensive care coordination and coaching supports for clients to include:
 1. Collecting or completing a HRSN screen (upon client enrollment in Life360 and every six (6) months during program participation)
 2. Conducting an in-depth personal interview related to HRSN identified in the screening and the barriers to addressing those needs. The Life360 is responsible for developing the interview tool to be used, the implementation process and the staff training process for engaging clients
 3. Developing and maintaining a PCAP for each client that includes:
 - a. Client goals and preferences for addressing needs. Goals should address:
 - i. Obtaining a primary care physician and addressing unmet medical needs
 - ii. Mental and emotional wellness
 - iii. Financial needs, including applying for or completing workforce training or education programs
 - iv. Obtaining or maintaining employment, and
 - v. Obtaining or sustaining safe housing
 - b. Identified HRSN needs and personal interview results, including strengths and personal history if applicable, such as criminal justice involvement
 - c. Plan for overcoming barriers for accessing services and avoidance of non-emergent emergency department visits
 - d. Unmet needs for non-medical community supports and a plan for meeting those needs
 4. Working directly with clients and their families to improve their skills to be healthy physically, socially, emotionally, and to thrive in their communities. Services may include the following activities as specified in the PCAP:
 - a. Engaging clients in promoting their own health

- b. Coordinating with external medical and non-medical providers to connect clients with needed health services and community supports
 - c. Assisting clients in obtaining services that reduce preventable utilization of emergency departments and inpatient hospital settings
 - d. Strengthening client life skills and implement plan to maximize participation in education, employment training and other supports that reduce the risk of poverty
 - e. Transporting clients to non-medical appointments. Life360 funds cannot be used for costs transporting a client or assisting with transportation of a client to a job interview.
5. Providing supports through:
- a. home or community visits
 - b. office visits including career center
 - c. video-supported visits
 - d. telephone or text message contacts, though not exclusively so
6. Documenting client's progress toward meeting goals established in the PCAP, including:
- a. Weekly update of client and staff activities
 - b. Gaps in available community services
 - c. Responsiveness from client
 - d. Any completed or newly identified goals or unmet needs

210.700 Program Funding**1-1-23**

After the startup phase and successful completion of readiness review, Maternal Life360 will receive the following payments:

- A. A PMPM: global payment will be made to a Maternal Life360 to cover the costs of all home visiting services necessary to implement home visiting model fidelity and administrative costs of operating the program (staff recruitment and training, data collection and reporting, financial management, etc.). The global payment will be actuarially sound and made to each Maternal Life360 on a per member per month (PMPM) basis. The global capitation payment amount is determined by Arkansas Medicaid.
- B. Transportation: An annual amount specified in the Life360 HOME agreement. DMS will divide the amount into equal monthly amounts and pay the Life360 monthly. The funding may be used for transportation costs incurred during home visits to clients, to transport clients to non-medical appointments (excluding transportation to job interviews), or to obtain other HRSN-related supports. Allowable uses of this funding include:
- 1. Gasoline or mileage for the Life360s travel
 - 2. Bus travel, car rental, and taxi or other driver service for non-medical appointments for clients necessary to meeting the client's documented HRSN needs (excluding transportation to job interviews)
 - 3. Staff time for operating a vehicle for transporting clients to and from non-medical appointments.

C. The **Maternal Life360** will receive a prorated PMPM for clients beginning upon client enrollment in in the Maternal Life360. Payments will be prorated for the number of days in the month from the client enrollment date.

Rural Life360s will receive three (3) additional types of payments following startup costs for:

- A. Transportation: An annual amount specified in the Life360 HOME agreement. DMS will divide the amount into equal monthly amounts and pay the Life360 monthly. The funding may be used for transportation costs incurred during home visits to clients, to transport clients to non-medical appointments (excluding transportation to job interviews), or to obtain other HRSN-related supports. Medicaid clients should utilize non-emergency transportation services for medical appointments. Allowable uses of this transportation funding include:
 1. Gasoline and mileage for the Life360s travel
 2. Bus travel, car rental, and taxi or other driver service for client transportation to non-medical appointments necessary to meeting the client's documented HRSN needs (excluding transportation to job interviews).
- B. Emergency Equipment and Training: In a monthly amount based on the approved annual program budget and specified in the Life360 HOME agreement. DMS will divide the annual amount by twelve (12) and pay the Life360 monthly up to the annual allotment amount. The funding may be used for costs related to improving emergency medical services in the rural communities that the Life360 serves, including enhanced equipment and staff training, and to support improvements in equipment necessary for the delivery of medical services through telemedicine. An accounting of these funds must be provided as part of the monthly expenditure reports.
- C. Intensive Care Coordination: In a monthly amount based on the approved program budget and specified in the Life360 HOME agreement. DMS will pay an all-inclusive flat rate monthly to pay for assisting clients through intensive care coordination, one-on-one engagement, community HRSN screening and referrals, the cost of supervisors, and other program costs. The fee includes both direct program costs and indirect costs as outlined in the program payment section. Allowable uses include staff, equipment, and supports identified in startup plan and budget, and other uses approved by DMS. Time-limited expenses to enable a client to access services or supports to meet an identified HRSN also are allowable program costs. Refer to the glossary under HRSN reimbursable costs. The all-inclusive rate will include an amount up to 20 percent of the direct staff costs for indirect costs associated with managing the program.
- D. Acute Care Unit Observation and Stabilization Staff: In a monthly amount based on the approved program budget and specified in the Life360 HOME agreement. DMS will divide the annual amount used for costs related to maintaining continuous clinical staff in the acute care unit into monthly amounts. This funding is intended to assist the hospital with paying for the ACU to be staffed and available even when patient services are not immediately needed.

Success Life360 will receive three additional types of payments following the startup payments:

- A. Technology: An annual amount based on the approved annual program budget and specified in the Life360 HOME agreement. DMS will divide the amount into equal monthly amounts and pay the Life360 monthly. The funding may be used for technology costs incurred to support data-sharing with partner organizations and providers that serve clients, including equipment, infrastructure, and technology and data services.
- B. Intensive Care Coordination: In an annual amount based on the approved program budget and specified in the Life360 HOME agreement. DMS will pay an all-inclusive flat rate monthly to pay for assisting clients through intensive care coordination, one-on-one engagement, the cost of supervisors, and other program costs. The fee includes both direct program costs and indirect costs as outlined in the program payment section (See 230.000, Payment Details). Allowable uses include staff, equipment, and supports identified in the startup plan and budget and other uses approved by DMS. Time-limited expenses to enable a client to access services or supports to meet an identified HRSN

also are allowable program costs. Refer to the glossary under HRSN reimbursable costs. The all-inclusive rate will include an amount up to 20 percent (20%) of the direct staff costs for indirect costs associated with managing the program.

- C. Success Payments: DHS will award a success payment to the Life360 for each enrolled client who achieves the following goal(s):
1. Clients who were formerly in the custody of the DHS Division of Youth Services or the Arkansas Department of Corrections remain out of the judicial system (no arrests or criminal charges) and out of incarceration for twelve (12) consecutive months after enrollment in the Life360.
 2. Attains an educational diploma, certificate, or degree, including a General Educational Development certificate, high school diploma, associate degree, certificate program through an accredited institution of higher education, or completes a workforce training, trade, or other work certification program after enrollment in the Life360.
 3. Achieves full-time employment and maintains it for twelve (12) consecutive months after enrollment in the Life360.
 4. Maintains full-time employment for twelve (12) consecutive months after enrollment in the Life360.
 5. Clients who have a diagnosis of SUD and maintain sobriety for twelve (12) consecutive months as confirmed by a treatment program, rehabilitation program, sponsor, or support group leader after enrollment in the Life360.

Success Life360s will inform DHS of any clients who have achieved any of these milestones. DHS will review and determine whether the Life360 may receive one (1) or multiple success payments for a single client who achieves in more than one (1) category. The amount of the payments will be established annually and published in the Life360 HOME agreement. Life360s may provide enrolled clients nominal incentives valued at no more than two-hundred and fifty dollars (\$250) annually for achieving milestones or goals.

Maternal, Rural and Success Life360 expenditures will be subject to audit.

210.8900 Acceptable Performance and Performance Measures

1-1-23

Life360's supports must meet acceptable performance, which will be determined based on whether it has been able to fulfill the program requirements and performance measures outlined in the Life360 HOME agreement with DMS, including:

- A. Serving the targeted number of clients, number of visits, number of individuals screened, as specified in the Life360 HOME agreement
- B. Meeting all reporting requirements specified in the Life360 HOME agreement in the specified timelines
- C. Demonstrating client success as evidenced by meeting annual targets outlined in the Life360 provider agreement.

Life360 performance measures are proposed and subject to change based on the final evaluation and monitoring plan approved by CMS.

DHS will ensure that Life360s meet acceptable performance and that action is taken to address any identified non-compliance with Life360 funding parameters. If DHS determines that a Life360 has failed to demonstrate appropriate performance, including enrolling an insufficient number of clients, DHS may impose corrective actions that could include:

- A. A corrective action plan

- B. Caps on funding
- C. Recoupment of funds
- D. Discontinuation of Life360 funding

DHS also may impose corrective actions for a Life360 if it determines the Life360 is out of compliance with requirements included in the Life360 HOME agreement and/or policy letters or guidance set forth by DHS or CMS ARHOME 1115 Demonstration Special Terms & Conditions or the CMS 1915(b) Standard Terms & Conditions. Prior to initiating any corrective action on a provider, DHS shall provide the provider notice and an opportunity to comment regarding the identified area of non-compliance.

220.000 DELIVERY OF SERVICES

220.100 Life360 Client Engagement **1-1-23**

This manual is not exhaustive of what will need to be in place to ensure consistency and integrity of services provided to Life360 clients. Programs are expected to establish policies and procedures prior to implementation to ensure successful client engagement, safety, and adherence to all applicable laws and/or requirements in serving clients. To that end, Life360s will be responsible for ensuring the following guidance for services as well as any requirements contained in the Life360 HOME agreement, or in this manual pertaining to provision of services, are incorporated.

220.200 Consent **1-1-23**

Each client who is confirmed eligible by the Life360 will complete a consent form prior to intensive care coordination services beginning. Clients must be informed of relevant program policies and procedures relative to their participation in the program including client and staff safety, confidentiality, how long/frequent services are available, program expectations, and that services are voluntary. This program communication must be approved by DHS.

The program must notify clients at the time of consent if there will be a delay in starting services for any reason (i.e., program at capacity, facility, or staff issue), inform the client of the wait time, and the referral partner, if applicable. The Life360 should connect waiting clients with other supports/services until Life360 services may begin. Life360s will not receive a PMPM payment for clients awaiting Life360 services. The Life360 must notify its referral network when clients cannot be assigned to a care coordinator due to capacity limitations or other factors. The Life360 must notify DHS if the program is delaying services for new clients or suspending services to existing clients. The notification must be made within five days of denying or suspending services to eligible clients.

220.300 Duration of Services **1-1-23**

The total length of time in which clients can receive intensive care coordination services is as follows:

- A. **Maternal Life360** - Services begin during pregnancy through home-visiting and continue up to two years after birth of the baby for clients enrolled in a QHP through ARHOME and one year for clients enrolled in any other Medicaid category of assistance and based upon continued need of home-visiting support.
- B. **Rural Life360** - Services can be provided by care coordination coaches for up to twenty-four (24) months if the individual is actively working towards his or her goals and the individual remains eligible for the ARHOME program. DMS may extend the amount of time someone is eligible for a Rural Life360 based on a review of goals and progress toward

those goals. If an enrolled client moves to another Medicaid aid category, the client will be disenrolled from the Rural Life360 program.

- C. **Success Life360** – Services are based upon PCAP goals, and obtainment of goals is expected to be achieved in twenty-four (24) months or less. If an enrolled client moves to another Medicaid aid category, the client will be disenrolled from the Success Life360 program.

220.400 Person-Centered Action Plan (PCAP)

1-1-23

Rural Life360 and Success Life360 clients will develop an individualized person-centered action plan (PCAP) facilitated by their care coordination coach or community partner organization to address health needs and HRSN. The PCAP will be updated regularly to reflect goals met, new circumstances or needs, annually at a minimum. The PCAP must describe the client's strengths, preferences, and HRSN as identified by the HRSN screen as well as needs for linkage with medical providers. The plan must include short-term (less than 6 months) goals, a crisis plan, and longer-term goals (more than 6 months). Each PCAP must include goals in areas identified through screening and ongoing interaction with the client, including but not limited to:

- A. Safe housing including utilities, if necessary
- B. Food security and nutrition
- C. Employment and/or education
- D. Financial stability and any needed social services
- E. Health and emotional wellness
- F. Establishing a relationship with a PCP and all needed healthcare providers for preventative care (and to avoid non-emergent emergency department visits)
- G. Criminal justice involvement, if applicable
- H. Transportation

Maternal Life360 will implement the approaches of the evidence-based model selected and/or processes set by the program that utilize best practices and tools for quality and effectiveness of home visits and to document observations and assessments of maternal/child health and any other family outcomes included. Therefore, a separate PCAP will not be required.

220.500 SDOHRSN Screening and Other Assessments

1-1-23

A HRSN screening will be conducted with every Life360 client as part of the initial eligibility determination within fifteen (15) calendar days of referral and every six (6) months during program participation. This screening also starts the process to identify areas for intensive care coordination. The screening should be done in a manner that is consistent, or asks the same questions across individual clients, is accessible or engaging for the client, and is coordinated with any additional screening and assessment that may part of the program. The screening tool must address the following core elements.

- A. Housing instability
- B. Food insecurity
- C. Utility needs
- D. Interpersonal safety
- E. Transportation needs

- F. Financial strain
- G. Employment
- H. Family and community support
- I. Education
- J. Physical activity
- K. Substance use
- L. Mental health
- M. Disabilities

DHS will review the screening tool(s) during the application process. DHS may provide feedback on the tools and require revisions to ensure alignment with program goals. If a Life360 changes its HRSN screening tool, it must submit its new tool before making the change to DHS for approval. Life360s may only change screening tools at the beginning of a calendar year.

220.600 Intensive Care Coordination

1-1-23

Care coordination will be conducted by:

- A. Home-visiting staff who meet the qualifications of the evidence-based home-visiting model the Life360 implements for the Maternal Life360 program
- B. Care coordination coaches for the Rural Life360 program who are vetted and approved by the hospital. Individuals may be a peer or someone with lived experience, and/or an individual familiar with local resources.
- C. Staff or volunteers vetted and approved by community partner organizations for Success Life360 program

The individuals in these roles are expected to form a trusting relationship with the client and serve as a significant source of support to the client. Individuals in these roles will meet with the client as frequently as needed and provide life skills development and training as appropriate and directly connects the client with medical, educational, and social services and supports needed to meet the client's goals. They also will actively assist the client in obtaining services and supports, communicating with providers about referrals and outcomes of services and supports, encourage and motivate the client to set and attain goals and meet milestones, and provide advocacy as needed.

220.700 Frequency and Duration

1-1-23

Frequency of interaction, or how much time lapses in between, is to be determined based on the selected program model or evidence-based, home-visiting model. Meetings/visits with client should be based on the client's needs and occur consistently. The duration of client meetings/visits (e.g., one (1) hour) should be sufficient to address client needs, follow any program model guidance or policies, and be flexible enough to accommodate the client's work schedule/life circumstances.

220.800 Setting and Location

1-1-23

Intensive care coordination may be delivered in the client's home, ~~or in~~ the community partner organization facility, medical clinic, behavioral health clinic, or hospital settings. For some clients, services may occur in a shelter setting or educational/job training settings. Video-supported

telehealth visits also may be appropriate, particularly for Rural Life360 or clients being served in remote areas or for clients experiencing contagious illness.

220.900 Client Termination of Services

1-1-23

A client may terminate services at any time by informing the DHS enrollment broker or Life360 provider if they no longer wish to participate. Clients may be allowed to re-enroll at any time if they remain eligible for the program.

Life360s must disenroll clients for the following reasons:

- A. Client moved outside of the program's service area
- B. Client is living in an institution for more than thirty (30) days
- C. Client is incarcerated or in jail
- D. Client has died
- E. Client has an illness that does not allow for continued participation
- F. Client continues to display disruptive or unsafe behavior that threatens staff safety
- G. Client is no longer eligible for the program
- H. Client stops participating in services for thirty (30) days and is non-responsive to Life360 contact efforts
- I. Other reasons approved by DMS

If the reason for disenrollment is failure to participate in the program, the Life360 must attempt to contact the client at least three times before moving forward with disenrollment. The Life360 must provide notification of disenrollment to DHS for E, F, H, and I that provides the reason for the disenrollment and supporting information.

Life360s may not terminate services because a client is experiencing homelessness or housing instability. The Life360 or its community partner organization should work with the client to identify resources to move toward stable housing as well as arrange other safe settings for meetings where client confidentiality can be maintained. Clients who enter a residential treatment program or who may have an illness for a brief period (60 days or less) can be temporarily suspended in the program and resume when the client is able to participate in services.

220.950 Documentation of Intensive Care Coordination in Client File

1-1-23

Providers must develop and maintain sufficient written documentation for each client being served. This documentation, at a minimum, must consist of:

- A. Signed consent by client, or client's legal guardian, to receive services and share data with DHS, community partners
- B. Date services begin and referral documentation
- C. A copy of all PCAPs, home-visiting assessments, and HRSN assessments
- D. Services or supports rendered or obtained by client
- E. Referrals and outcomes of referrals for HRSN
- F. The date and time intensive care coordination occurs

- G. The name and title of the individual who provided the service
- H. Updates for each client contact describing the client's progress toward milestones and goals and any concerns/issues with engagement
- I. Completed forms as required by DHS or other entity

Additional documentation and information may be required depending on the service to be provided.

230.000 PAYMENT DETAILS

230.100 Allowable Life360 costs

1-1-23

Subject to the funding limits in the ARHOME 1115 Waiver, DHS will review, approve, and make payments for Life360 funding in accordance with the requirements in the 1115 demonstration Special Terms and Conditions and other CMS requirements. DHS will make payments directly to the approved and enrolled hospitals. Life360 funding must not supplant funding provided by other federal, state, or local funding sources.

Providers must attest during readiness review to DHS that they have appropriate fund controls to correctly submit payment for Life360 funding that is separate from medical services paid for by Medicaid, Medicare, other insurance, and any other third-party payer. Expenditure authority will make funding available to selected Medicaid-enrolled hospitals for:

- A. Intensive care coordination service for target populations, including direct costs of recruiting, training, and employing care coordinators to provide intensive care coordination to the targeted Life360 population
- B. Indirect costs necessary to support ongoing project costs such as information technology or personnel directly responsible for the project including fiscal, programmatic, etc.
- C. Startup costs necessary for the development of capacity, infrastructure, and systems to begin the program, complete a community network assessment, and formulate partners/subcontractors, and
- D. Nonmedical client supports as outlined in this manual.

Medical care costs are not reimbursable and should be billed as usual through the client's Medicaid program.

More details on included costs for each type of Life360 are described in 210.700, Program Funding.

Capital improvement costs beyond specific allowed costs are not allowable. Please refer to HRSN-reimbursable costs in this manual in 240.000, Glossary and in 210.700, Program Funding sections for more details on allowable expenditures.

230.200 Maternal Life360 Payment and Reporting

1-1-23

- A. Arkansas Medicaid will pay the Maternal Life360 a per member per month (PMPM) fee based on the established program rates.
 - 1. Providers must enroll clients to receive the PMPM payment for each enrollee.
 - 2. Refer to the Rate Sheet for the current fee. Fees will be updated based on rate review on an as needed basis.
- B. Startup payment and monthly transportation fees will be paid to the hospital's provider ID.

- C. Programs will be able to reconcile cost differences at the end of the year (or more frequently) based on any changes to their program that may warrant a rate adjustment within the established program rate structure.

230.300 Rural Life360 Payment and Reporting Instructions

1-1-23

Startup payments and monthly Ppayment will be made to the hospital's provider ID per the terms of the Life360 HOME agreement.

Reporting requirements by cost type:

- A. Intensive Care Coordination: The Life360 will complete monthly cost reports using the DHS approved form. The report should be for the actual cost of care coordination services and community HRSN screenings and indirect costs for that month. The amount may vary based on ongoing expenditures/costs but will not exceed the total approved annual budget in the Life360 HOME agreement.
- B. Transportation/Emergency Equipment and Training: The Life360 will Pprepare and submit a monthly cost report for the prorated annual transportation and emergency equipment and training expenditures.
- C. Startup: The Life360 shall provide start-up cost(s) once DHS approves successful completion of the application or readiness review and the Life360 has submitted a signed agreement. Startup costs will be reported monthly.

230.400 Success Life360 Payment and Reporting

1-1-23

Monthly payment will be made to the hospital's provider ID per the terms of the Life360 HOME agreement.

Reporting requirements by cost type:

- A. Intensive Care Coordination: The Life360 will complete monthly cost reports using the DHS approved form. The report should be for the actual cost of care coordination services and indirect costs for the month. The amount may vary based on ongoing expenditures/costs but will not exceed the total approved annual budget in the Life360 HOME agreement.
- B. Technology: The Life360 will Pprepare and submit a monthly report for the prorated annual technology costs.
- C. Success payments: At the end of each year, Life360 will submit a request for payment for the number of clients who have been approved for Success payments by DHS. See Program Funding section for more details.
- D. Startup: The Life360 shall receive payment for the approved startup cost(s) once DHS approves successful completion of the application or readiness review and the Life360 has submitted a signed agreement. Startup costs will be reported monthly.

240.000 GLOSSARY

Acute care hospital means a hospital that:

- A. Is licensed by the Department of Health under § 20-9-201 et seq., as a general hospital or a surgery and general medical care hospital; and
- B. Is enrolled as a provider with the Arkansas Medicaid Program.

Birthing hospital means a hospital in this state or in a border state that:

- A. Is licensed as a general hospital;

B. Provides obstetrics services; and

C. Is enrolled as a provider with the Arkansas Medicaid program.

Care coordination coaches mean those individuals who establish relationships with their clients to ensure effective participation in the Rural Life360 program. Coaches may work under various titles including peer specialists, peer counselors, family support workers, and home visitors. They work directly with clients and their families to improve their life skills to be physically, socially, and emotionally healthy to live successfully in their communities.

Community services mean any resource or services provided by public or private organizations to community residents to assist with a particular social need such as mental health or counseling or health-related needs including housing or food or job training and employment. It may also include other general services or programs offered through libraries or other local government funding that benefit the community.

Evidence-based home visitation means a home visitation program that is based on one of the models recognized by the U.S. Department of Health and Human Services to be effective in improving maternal and child health.

High-risk pregnancy means a pregnancy with a diagnostic code of supervision of high-risk pregnancy, as evidenced by a physician or Advanced Practice Registered Nurse (APRN) referral. High-risk diagnosis includes medical and/or social risk.

Home-visiting means an evidence-based program that provides direct support and intensive care coordination of services for clients served by Maternal Life360s with the goals of improving maternal and infant health outcomes, promoting child development and school readiness, connecting families to needed community resources and supports, and increasing a family's education and earning potential.

HRSN reimbursable cost means time-limited expenses to enable a client to access services or supports to meet an identified HRSN allowable under Life360. These must be identified through a Health-Related Social Needs (HRSN) screening, or the client's engagement with the care coordinator, and are transitional in nature. Examples include housing safety inspections, pest control, security deposit and first month's rent that is required to obtain a lease on an apartment or home, and nutritional instruction for disease control/prevention.

HRSN screening means a standardized way of capturing a Life360 client's health-related social needs to determine any needs or barriers a client may experience at the time of screening. For example, an individual may have trouble paying rent on time and be at risk of losing their apartment. A pregnant individual may experience difficulty going to her doctor's appointments due to not having a car and lack resources for food. Information gathered through the screening may be used to help inform care coordination plans or referrals to community services and supports.

Individual Qualified Health Plan (QHP) means an individual health insurance benefit plan offered in the health insurance marketplace to provide coverage in Arkansas that covers only essential health benefits as defined by Arkansas rule and 45 C.F.R. § 156.110 and any federal insurance regulations.

Intensive care coordination is an umbrella term for a collaborative process in which a care coordinator or others assess, plan, implement, coordinate, monitor and evaluate the options, services and supports required to meet the client's health and HRSN needs. It is characterized by advocacy, communication, and resource management, and promotes quality interventions and outcomes. In addition to addressing medical services, care coordination coaches ensure that clients have safe housing, employment, education, financial stability, and emotional/mental wellness.

Mental illness refers to clients with a diagnosis of one or more of the following: neurodevelopmental disorders, schizophrenia spectrum and other psychotic disorders, bipolar

and related disorders, depressive disorders, anxiety disorders, obsessive-compulsive and related disorders, trauma- and stressor-related disorders, dissociative disorders, somatic symptom and related disorders, feeding and eating disorders, and personality disorders.

Non-Reimbursable Community Contribution (NRCC) means a payment, including an in-kind payment, for goods or services provided to a client to assist the client with meeting a HRSN identified in the client's person-centered action plan but is not a HRSN-reimbursable cost or reimbursable through other Medicaid funds under the Life360 HOME agreement. NRCC may include rent or utility costs for example, or excluded categories (i.e. job preparation expenses such as clothing or personal care). The identification of sources of NRCC and the types of NRCC provided shall be included in the application and in program reports.

Partner agreement means the sub contractual agreement executed between the Life360 and its partner subrecipients. The subrecipient has its performance measured against whether the objectives of the program as outlined in the Life360 HOME agreement between DHS and the Life360 are met; has responsibility for programmatic decision-making; and uses funds to carry out the program by providing goods or supports to clients. Subrecipients are identified in the application and in programmatic and financial reports. Additional subrecipients can be requested during the program period by contacting the Life360 program manager at DHS. Subrecipients will need to be updated into the Life360 HOME agreement.

Person-Centered Action Plan (PCAP) means a plan completed by the Life360 that identifies a client's strengths, preferences and includes information from the HRSN screen and additional information gathered from the client through meetings and any other tools utilized by the program. The PCAP includes short and longer-term goals and objectives to address the client's HRSN and other personal goals as well as details on how and what services and supports will be obtained, a crisis plan, and documentation of progress on goals and successes and barriers encountered. The PCAP is updated as the client meets goals, circumstances change, or the sets new goals.

Life360 HOME agreement means the administrative instrument to be executed between the Arkansas Department of Human Services (DHS) Division of Medical Services (DMS) and an Arkansas Medicaid enrolled hospital Life360 provider.

Rural area means an Arkansas county where a hospital designated as a critical access hospital or participant in the Small Rural Hospital Improvement Program is located or an Arkansas county with a population of fifty-thousand (50,000) or less.

Small rural hospital means a critical access hospital or a general hospital that:

- A. Is located in a rural area;
- B. Has fifty (50) or fewer staffed beds; and
- C. Is enrolled as a provider in the Arkansas Medicaid program.

Health-Related Social Needs (HRSN) means conditions in the environments where people are born, live, learn, work, play, worship, and age that affect a wide range of health, functioning, and quality-of-life outcomes and risks.

Veteran means a person who served in the active military, naval, or air service and who was discharged or released there-from, as verified by DD214 documentation.

Application for
Section 1915(b) (4) Waiver
Fee-for-Service
Selective Contracting Program

PROPOSED

June, 2012

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PROPOSED

Application for Section 1915(b) (4) Waiver Fee-for-Service (FFS) Selective Contracting Program

Facesheet

The **State** of _____ requests a waiver/amendment under the authority of section 1915(b) of the Act. The Medicaid agency will directly operate the waiver.

The **name of the waiver program** is _____.
(List each program name if the waiver authorizes more than one program.).

Type of request. This is:

- an initial request for new waiver. All sections are filled.
- a request to amend an existing waiver, which modifies Section/Part _____
- a renewal request

Section A is:

- replaced in full
- carried over with no changes
- changes noted in **BOLD**.

Section B is:

- replaced in full
- changes noted in **BOLD**.

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Effective Dates: This waiver/renewal/amendment is requested for a period of dd years beginning _____ and ending _____.

State Contact: The State contact person for this waiver is _____ and can be reached by telephone at (____) _____, or fax at (____) _____, or e-mail at _____.
(List for each program)

Section A – Waiver Program Description

Part I: Program Overview

Tribal Consultation:

Describe the efforts the State has made to ensure that Federally-recognized tribes in the State are aware of and have had the opportunity to comment on this waiver proposal (if additional space is needed, please supplement your answer with a Word attachment).

Program Description

Provide a brief description of the proposed selective contracting program or, if this is a request to amend an existing selective contracting waiver, the history of and changes requested to the existing program. Please include the estimated number of enrollees served throughout the waiver (if additional space is needed, please supplement your answer with a Word attachment).

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Waiver Services:

Please list all existing State Plan services the State will provide through this selective contracting waiver (if additional space is needed, please supplement your answer with a Word attachment).

A. Statutory Authority

1. **Waiver Authority.** The State is seeking authority under the following subsection of 1915(b):

1915(b) (4) - FFS Selective Contracting program

2. **Sections Waived.** The State requests a waiver of these sections of 1902 of the Social Security Act:

- a. **Section 1902(a) (1) - Statewideness**
- b. **Section 1902(a) (10) (B) - Comparability of Services**
- c. **Section 1902(a) (23) - Freedom of Choice**
- d. **Other Sections of 1902 – (please specify)**

B. Delivery Systems

1. **Reimbursement.** Payment for the selective contracting program is:

- the same as stipulated in the State Plan
 is different than stipulated in the State Plan (please describe)

2. **Procurement.** The State will select the contractor in the following manner:

- Competitive** procurement
 Open cooperative procurement
 Sole source procurement
 Other (please describe)

C. Restriction of Freedom of Choice

1. **Provider Limitations.**

- Beneficiaries will be limited to a single provider in their service area.
 Beneficiaries will be given a choice of providers in their service area.

(NOTE: Please indicate the area(s) of the State where the waiver program will be implemented)

2. **State Standards.**

Detail any difference between the state standards that will be applied under this waiver and those detailed in the State Plan coverage or reimbursement documents (if additional space is needed, please supplement your answer with a Word attachment).

D. Population Affected by Waiver

(May be modified as needed to fit the state's specific circumstances)

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1. **Included Populations.** The following populations are included in the waiver:

- Section 1931 Children and Related Populations
- Section 1931 Adults and Related Populations
- Blind/Disabled Adults and Related Populations
- Blind/Disabled Children and Related Populations
- Aged and Related Populations
- Foster Care Children
- Title XXI CHIP Children

2. **Excluded Populations.** Indicate if any of the following populations are excluded from participating in the waiver:

- Dual Eligibles
- Poverty Level Pregnant Women
- Individuals with other insurance
- Individuals residing in a nursing facility or ICF/MR
- Individuals enrolled in a managed care program
- Individuals participating in a HCBS Waiver program
- American Indians/Alaskan Natives

- Special Needs Children (State Defined). Please provide this definition.
- Individuals receiving retroactive eligibility
- Other (Please define):

Part II: Access, Provider Capacity and Utilization Standards

A. Timely Access Standards

Describe the standard that the State will adopt (or if this is a renewal or amendment of an existing selective contracting waiver, provide evidence that the State has adopted) defining timely Medicaid beneficiary access to the contracted services, *i.e.*, what constitutes timely access to the service?

1. How does the State measure (or propose to measure) the timeliness of Medicaid beneficiary access to the services covered under the selective contracting program (if additional space is needed, please supplement your answer with a Word attachment)?

PROPOSED

2. Describe the remedies the State has or will put in place in the event that Medicaid beneficiaries are unable to access the contracted service in a timely fashion (if additional space is needed, please supplement your answer with a Word attachment).

B. Provider Capacity Standards

Describe how the State will ensure (or if this is a renewal or amendment of an existing selective contracting waiver, provide evidence that the State has ensured) that its selective contracting program provides a sufficient supply of contracted providers to meet Medicaid beneficiaries' needs.

1. Provide a detailed capacity analysis of the number of providers (e.g., by type, or number of beds for facility-based programs), or vehicles (by type, per contractor for non-emergency transportation programs), needed per location or region to assure sufficient capacity under the selective contracting program (if additional space is needed, please supplement your answer with a Word attachment).

PROPOSED

2. Describe how the State will evaluate and ensure on an ongoing basis that providers are appropriately distributed throughout the geographic regions covered by the selective contracting program so that Medicaid beneficiaries have sufficient and timely access throughout the regions affected by the program (if additional space is needed, please supplement your answer with a Word attachment).

B. Utilization Standards

Describe the State's utilization standard specific to the selective contracting program.

1. How will the State (or if this is a renewal or amendment of an existing selective contracting waiver, provide evidence that the State) regularly monitor(s) the selective contracting program to determine appropriate Medicaid beneficiary utilization, as defined by the utilization standard described above (if additional space is needed, please supplement your answer with a Word attachment)?

2. Describe the remedies the State has or will put in place in the event that Medicaid beneficiary utilization falls below the utilization standards described above (if additional space is needed, please supplement your answer with a Word attachment).

Part III: Quality

A. Quality Standard and Contract Monitoring

PROPOSED

1. Describe the State's quality measurement standards specific to the selective contracting program (if additional space is needed, please supplement your answer with a Word attachment).
 - a. Describe how the State will (or if this is a renewal or amendment of an existing selective contracting waiver, provide evidence that the State):
 - i. Regularly monitor(s) the contracted providers to determine compliance with the State's quality standards for the selective contracting program.
 - ii. Take(s) corrective action if there is a failure to comply.

2. Describe the State's contract monitoring process specific to the selective contracting program (if additional space is needed, please supplement your answer with a Word attachment).
 - a. Describe how the State will (or if this is a renewal or amendment of an existing selective contracting waiver, provide evidence that the State):
 - i. Regularly monitor(s) the contracted providers to determine compliance with the contractual requirements of the selective contracting program.
 - ii. Take(s) corrective action if there is a failure to comply.

PROPOSED

B. Coordination and Continuity of Care Standards

Describe how the State assures that coordination and continuity of care is not negatively impacted by the selective contracting program (if additional space is needed, please supplement your answer with a Word attachment).

Part IV: Program Operations

A. Beneficiary Information

Describe how beneficiaries will get information about the selective contracting program (if additional space is needed, please supplement your answer with a Word attachment).

PROPOSED

B. Individuals with Special Needs.

- The State has special processes in place for persons with special needs (Please provide detail).

Section B – Waiver Cost-Effectiveness & Efficiency

Efficient and economic provision of covered care and services:

1. Provide a description of the State's efficient and economic provision of covered care and services (if additional space is needed, please supplement your answer with a Word attachment).

2. Project the waiver expenditures for the upcoming waiver period.

Year 1 from: ___/___/___ to ___/___/___

Trend rate from current expenditures (or historical figures): 0.00% %

Projected pre-waiver cost _____

Projected Waiver cost _____

Difference: _____

PROPOSED

Year 2 from: ___/___/___ to ___/___/___

Trend rate from current expenditures (or historical figures): 0.00% %

Projected pre-waiver cost _____

Projected Waiver cost _____

Difference: _____

Year 3 (if applicable) from: ___/___/___ to ___/___/___

(For renewals, use trend rate from previous year and claims data from the CMS-64)

Projected pre-waiver cost _____

Projected Waiver cost _____

Difference: _____

Year 4 (if applicable) from: ___/___/___ to ___/___/___

(For renewals, use trend rate from previous year and claims data from the CMS-64)

Projected pre-waiver cost _____

Projected Waiver cost _____

Difference: _____

Year 5 (if applicable) from: __/__/____ to __/__/____
(For renewals, use trend rate from previous year and claims data from the CMS-64)

Projected pre-waiver cost _____
Projected Waiver cost _____
Difference: _____

PROPOSED

Attachment A: Program Description

In January 2022, Arkansas Medicaid replaced the Arkansas Works program by implementing the Arkansas Health and Opportunity for Me program (ARHOME), which was passed by the Arkansas General Assembly as Act 530 of the 2021 Regular Session. ARHOME provides coverage for eligible individuals ages 19-64 who are in the Adult Expansion Group. As part of the new ARHOME program, Arkansas is creating a Maternal Life360 HOME program –that will create Community Bridge Organizations (CBOs), known as Life360 HOMEs, for women enrolled in ARHOME who have been diagnosed with a high-risk pregnancy. Maternal Life360 HOME (Maternal Life360) was developed to address the state’s low-ranking in maternal and child health indicators and high rates of maternal morbidity and mortality. The goal of the Maternal Life360 HOME is to improve state maternal health and child health outcomes, particularly birth outcomes, and other maternal health indicators, including prenatal visits and postpartum contraceptive use.

Medicaid finances more than 60 percent of all births in Arkansas. To improve the state’s ranking and the lives of moms and babies, Arkansas must focus on all high-risk pregnancies in the Arkansas Medicaid population, not just those in the ARHOME population. In Arkansas, Medicaid spends approximately \$140 million each year on costs related to poor birth outcomes.

This waiver will expand the Maternal Life360 HOME program to pregnant women in any Medicaid aid category with a high-risk pregnancy. High risk pregnancy is defined as a pregnancy with a diagnostic code that requires supervision of high-risk pregnancy, as evidenced by a physician or Advanced Practice Registered Nurse (APRN) referral. For eligible women, services can begin at any point during pregnancy and will continue up to one (1) year after the birth of the baby.

Expanding the Maternal Life360 HOME services to women with high-risk pregnancies in all Medicaid aid categories will promote greater use of preventative care services, reduce non-emergent use of emergency department services, lower the use of potentially preventable emergency department services, reduce the likelihood of preventable hospital admissions and readmissions, and result in improved birth outcomes for infants.

Only evidence-based home-visitation models—those defined as meeting the U.S Department of Health and Human Services department’s criteria as an evidence-based home visiting service delivery model—will be used to support the mother and the child.

There are currently four evidence-based home-visiting programs in use in Arkansas that serve families at some point between pregnancy and the baby’s first two years of life:

- Healthy Families America
- Nurse Family Partnership
- Early Head Start
- Parents as Teachers

Attachment B: Waiver Services

Maternal Life360 HOME

Women with high-risk pregnancies who are eligible for Medicaid but are not in the New Adult Medicaid Expansion Group can receive home-visiting services.

DHS will contract with approved Life360 hospitals to provide evidence-based home visiting services to women with a diagnosis code of high-risk pregnancy who live in the Life360's selected service area. The services start during pregnancy and will be provided through the baby's first 12 months. Client participation is voluntary, and the home visiting services are supplemental to the medical services they are already receiving through Medicaid.

Home visiting activities include

- Assessing the client and her family's health-related social needs
- Providing clients with education and support on prenatal health, birth preparation and newborn care
- Helping navigate medical care and addressing barriers that could prevent regular prenatal visits and well child visits
- Assisting with accessing needed resources and services, including referring to community and state resources, such as food banks, WIC, and housing services.
- Assisting with enrollment in education or workforce training programs and gaining employment.

Attachment C: Delivery Systems, Procurement

Any entity that meets the licensure and provider requirements may participate. First, the entity must be a “birthing hospital” as defined by Arkansas Act 530 of 2021 and be enrolled as an Arkansas Medicaid provider. The hospital must either directly offer or contract with a home visiting provider to offer evidence-based home visiting services. Each entity must then apply to participate and be approved by DHS. Approved Life360s then will sign a Maternal Life360 Provider Agreement with DHS to enroll become a Maternal Life360 HOME.

PROPOSED

C. Restriction of Freedom of Choice

1. Provider Limitations Areas of the state where the waiver program will be implemented: The program will be implemented in any area of the state where DHS approves a qualified Life360 HOME provider to operate.

Clients will enroll in a Life360 HOME based on the defined catchment area and the provider's capacity to serve them.

PROPOSED

Attachment D: Timely Access Standards

1. To participate in the Maternal Life360 HOME waiver program, the provider must maintain fidelity to an evidence-based home-visiting model, including appropriately timed home visits in accordance with the guidelines set in this waiver. The guidelines provide flexibility for the visiting care coordinator to also consider the individual needs of the family when scheduling home visits. Hospitals enrolled as Maternal Life360 HOMEs will be required to develop and implement written policies and procedures to ensure clients receive timely access to appropriate home visit services tailored to the specific needs of each client. DHS will also monitor time from client enrollment to first home visit.
2. The notices clients receive when they are enrolled in the Life360 HOME will provide a phone number they can call if they are unable to schedule a home visit within the first 30 days of enrollment. DHS will monitor the time from client enrollment to first home visit as well as client complaints captured by the call center to ensure the Life360 HOME is providing timely service. If the Life360 HOME is not providing timely services, DHS may impose corrective actions that could include a corrective action plan, caps on funding, recoupment of funds or discontinuation of Life360 funding.

Attachment E: Provider Capacity Standards

The home visiting services provided through the Maternal Life360 HOME program will be supplemental to Medicaid State Plan services and will be offered in regions of the state where DHS-approved hospitals choose to establish the services. Because this is a voluntary service for a provider to provide, some areas of the state may not provide access to Life360 HOME services. However, over time, DHS believes the program will be considered a critical part of providing care to high-risk pregnant women and economically feasible enough to entice a significant number of hospitals to participate.

1. In the first year of the program, DHS anticipates five hospitals will become Maternal Life360 HOMEs, serving 2,000 clients (some of whom will be enrolled in ARHOME and served through the Section 1115 ARHOME waiver). In the second year, DHS estimates five more facilities will become approved Life360 HOMEs for a total of 10 facilities serving 3,000 clients. Ten hospitals participating would mean more than a quarter of the state's hospitals with an obstetrics unit would be providing home visiting services.
2. When new hospitals apply to become a Life360 HOME, DHS will consider the extent to which the hospital's proposed service area is adequately served and will work with hospitals to develop partnerships that allow for greater coverage across the state. DHS will encourage hospitals applying to become a Life360 HOME to include in their service area counties without birthing hospitals, so that home visiting services can support prenatal care where there is a scarcity of obstetric specialists.

Attachment F: Utilization Standards

1. To participate in the Maternal Life360 HOME waiver program, the provider must maintain fidelity to an evidence-based home-visiting model, including appropriately timed home visits in accordance with the guidelines of that evidence-based model set out in this waiver. The guidelines provide flexibility for the visiting care coordinator to also consider the individual needs of the family when scheduling home visits. Hospitals enrolled as Maternal Life360 HOMEs will be required to develop and implement written policies and procedures to ensure clients receive timely access to appropriate home visit services tailored to the specific needs of each client. While these policies and procedures are agency (Life 360 HOME) specific, the agency is responsible for ensuring the policies and procedures are consistent with the evidence-based home visiting model.

At a minimum, DHS expects clients to receive a home visit at least every 30 days. DHS requires Life360 HOMEs to disenroll and notify any client that 1.) has not received a visit in 30 days and 2.) at least three contact attempts have been made to reach the client. Life360s will be required to document visits made by entering encounters (or some other method) in the MMIS system. DHS will monitor MMIS-generated reports of encounters monthly to ensure all clients are seen at least every 30 days. Clients who have been disenrolled can re-enroll if they remain eligible by renewing their consent to participate with their signature.

2. Life360s must meet acceptable performance, including serving the targeted number of clients and providing the number of visits specified in the Life360 HOME agreement. DHS will ensure that Life360s meet acceptable performance and that action is taken to address any identified non-compliance with Life360 funding parameters. If DHS determines that a Life360 has failed to demonstrate appropriate performance, including insufficient client utilization, DHS may impose corrective actions that could include:
 - A. A corrective action plan
 - B. Limits on funding
 - C. Recoupment of funds
 - D. Discontinuation of Life360 funding

Attachment G: Quality Standards and Contract Monitoring

1. DHS will establish quality standards that measure services obtained as well as health outcomes. The State will monitor performance on these standards through two reporting mechanisms: quarterly reporting and annual quality metric calculations. Maternal Life360 HOMEs will be expected to report specified data quarterly, including the number of pregnant women who received prenatal care, deliveries, pre-term deliveries, type of delivery (e.g., C-section), birth weight, babies who receive well-child visits and immunizations, infant/maternal deaths and visits to the emergency room.

Annually, DHS will use claims data, birth certificate data and other available data resources to calculate quality metrics that follow the Adult/Child Core Set, HEDIS or other established metric specification. The metrics will be calculated for all the Maternal Life360 HOMEs and for each one individually, where the participation numbers are high enough to calculate a metric.

Life360 HOMEs will be expected to meet goals for process metrics and health outcomes established in their provider agreement. The process metrics and health outcomes will be used for program improvement and for corrective action plans, if necessary. Each year in the third quarter of the year, DHS will provide to the Life360 HOMEs their performance calculations on metrics (e.g., percent of low birthweight babies delivered, percent of deliveries that were pre-term) for the prior calendar year. DMS will review the quarterly data reported by the Life360 HOME and its performance on the annual metrics. The Life 360 HOME will address performance successes and weaknesses as part of its annual agreement for the next year.

DHS will also monitor fidelity to the evidence-based model by ensuring the program remains accredited/affiliated with the parent organization of the model.

The State also will track and monitor quality outcomes for purposes of conducting a rigorous independent evaluation of the Maternal Life360 Home program. As part of the performance review of the project, the state will collect and analyze quality data, including birth outcomes, rates of deliveries by elective C-section, use of preventative and other primary care services, use of emergency department services for non-emergent care, use of potentially preventable emergency department services and preventable hospital admissions, Medicaid expenditures among mothers and children up to one year after birth and improvements in health-related social needs.

2. DHS will establish standards that measure services the Life360 HOME provides. The State will monitor performance on these standards through monthly expenditures reporting and quarterly progress reporting. Life360 HOMEs will use the MMIS system to enroll clients and enter visits provided so that DMS can monitor client enrollment and services rendered.

DHS will ensure that Life360s meet acceptable performance and that action is taken to address any identified non-compliance with Life360 funding parameters. If DHS determines that a Life360 has failed to demonstrate appropriate performance, including enrolling an insufficient number of clients, DHS may impose corrective actions that could include:

- A. A corrective action plan

B. Limits on funding

C. Recoupment of funds

D. Discontinuation of Life360 funding

DHS also may impose corrective actions for a Life360 if it determines the Life360 is out of compliance with requirements included in the Life360 HOME agreement and/or policy letters or guidance set forth by DHS or CMS ARHOME 1115 Demonstration Special Terms & Conditions or the CMS 1915(b) Standard Terms & Conditions.

PROPOSED

Attachment H: Coordination and Continuity of Care Standards

The home visiting services provided through the Maternal Life360 HOME program will be supplemental to Medicaid State Plan services and will be offered in regions of the state where DHS-approved birthing hospitals choose to establish the services. The State believes these services will enhance the coordination and continuity of care in the areas where they are established. Home visitors will help their clients navigate the medical system and ensure they are accessing and receiving needed medical care. Additionally, the State anticipates the Maternal Life360 HOME program will provide vital care coordination services in areas without a birthing hospital when birthing hospitals that become Maternal Life360 HOMEs extend their service areas beyond their county borders.

PROPOSED

Attachment I: Client Information

Clients may receive information about the Life360 HOME through their OB/GYNs or through the Life360 HOME's community network. The State expects the Life360 HOME to have robust outreach to community partners (e.g., food banks, homeless shelters, local WIC programs) to be able to refer clients to services, but also to ensure the community partner refer clients to the Life360 HOME.

Additionally Medicaid or ARHOME qualified health plans may send mailers, postcards or emails to clients identified as potential Life360 clients based on high-risk pregnancy diagnosis code reported through claims data.

Each Life360 HOME may have a website for information regarding its home visiting services, referral network, and community resources. This website may be linked to the DHS Life360 HOME webpage that provides information for clients about Life360 enrollment. The Life360 HOME may also produce written marketing materials to distribute to enrollees and potential enrollees.

The Maternal Life 360 Home Providers will be required to provide all allowable written marketing materials in English, Spanish, and Marshallese if, in any county in the Life360's service area, the county population is comprised of at least 3% or more of individuals who speak the language.

Attachment J: Individuals with Special Needs

Each Life360 HOME must provide auxiliary aids and services to clients with special needs upon request, including, but not limited to, interpreter services and toll-free numbers with TTY/TTD capability.

The development of a person-center action plan (PCAP) is a requirement of the Maternal Life360 HOME program. This PCAP must include the services and supports necessary to meet each identified special need of the client.

PROPOSED

NOTICE OF RULE MAKING

The Director of the Division of Medical Services of the Department of Human Services announces for a public comment period of thirty (30) calendar days a notice of rulemaking for the following proposed rule under one or more of the following chapters, subchapters, or sections of the Arkansas Code: §§20-76-201, 20-77-107, 23-61-1004, and 25-10-129.

Effective January 1, 2023:

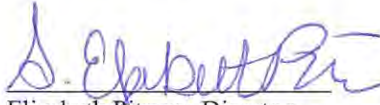
The Director of the Division of Medical Services creates the Life360 Manual and corresponding 1915(b) waiver, and amends the State Plan, to comply with Act 530 of the 93rd General Assembly. Act 530 directs that the Arkansas Health and Opportunity for Me Program reduces the maternal and infant mortality rates in the state through initiatives that promote healthy outcomes for eligible women with high-risk pregnancies and promotes the health, welfare, and stability of mothers and their infants after birth through hospital-based community bridge organizations; increases opportunities for full-time work and attainment of economic independence, to reduce long-term poverty that is associated with additional risk for disease and premature death; and addresses health-related social needs of Arkansans in rural counties through hospital-based community bridge organizations and reduces the additional risk of disease and premature death associated with living in a rural county. The State Plan Amendment also allows hospitals approved to provide Maternal Life360 HOME services can receive \$300 per member per month for women enrolled in the Maternal Life 360 HOME who are enrolled in an Arkansas Medicaid aid category that is not the 06 ARHOME Medicaid aid category. The proposed rule estimates a financial impact of \$6,463,500 (\$5,239,310 of which is federal funds) for state fiscal year (SYF) 2023 and \$16,871,000 (\$13,651,716 of which is federal funds) for SYF 2024.

The proposed rule is available for review at the Department of Human Services (DHS) Office of Rules Promulgation, 2nd floor Donaghey Plaza South Building, 7th and Main Streets, P. O. Box 1437, Slot S295, Little Rock, Arkansas 72203-1437. You may also access and download the proposed rule at <https://humanservices.arkansas.gov/do-business-with-dhs/proposed-rules/>. Public comments must be submitted in writing at the above address or at the following email address: ORP@dhs.arkansas.gov. All public comments must be received by DHS no later than November 7, 2022. Please note that public comments submitted in response to this notice are considered public documents. A public comment, including the commenter's name and any personal information contained within the public comment, will be made publicly available and may be seen by various people.

A public hearing by remote access only through a Zoom webinar will be held on October 20, 2022, at 10:00 a.m. and public comments may be submitted at the hearing. Individuals can access this public hearing at <https://us02web.zoom.us/j/82030061926>. The webinar ID is 820 3006 1926. If you would like the electronic link, "one-tap" mobile information, listening only dial-in phone numbers, or international phone numbers, please contact ORP at ORP@dhs.arkansas.gov.

If you need this material in a different format, such as large print, contact the Office of Rules Promulgation at 501-534-4138.

The Arkansas Department of Human Services is in compliance with Titles VI and VII of the Civil Rights Act and is operated, managed and delivers services without regard to religion, disability, political affiliation, veteran status, age, race, color or national origin. 4502100209


Elizabeth Pitman, Director
Division of Medical Services

DHS Responses to Public Comments Regarding Life 360 HOME Program

Amy Jo Grissom, HFA / PAT Coordinator

Inspired Communities Foundation

Comment: Thank you so much for our meeting this morning. This is something we've been looking forward to for some time. In talking over how realistic this is for our site, a few questions came up.

It was mentioned that there would be a payment of \$300 per family per month. Does this fluctuate month to month based on the current caseload for the month, or is it an amount that is set for each month based on the max caseload? Is the \$50,000 startup cost per hospital? per site the hospital contracts with? or per home visitor? And same with the mileage - per hospital? per site? or per home visitor?

Another thought that was discussed was the difference in programs (HFA vs. PAT). I am not sure how familiar you all are with the two, so I wanted to share a quick breakdown as maybe something to think about. An average full caseload for Healthy Families is 15 families seen weekly. An average full caseload for Parents as Teachers is 20 families seen twice monthly. So if we choose to use the HFA program (which is typically our choice with moms who have multiple risk factors), the total will be \$54,000 for a home visitor with a full caseload, who is completing 60 visits per month. On the other hand, if we choose to use the PAT program, the total will be \$72,000 for a home visitor with a full caseload, who is completing 40 visits per month. See the imbalance? It makes more sense for us financially to use only PAT, even though that really may not be the best option for the families. I'm wondering if there's a way to even this out? Just a thought?

Thanks again for your willingness to share today, and we are truly excited to see if this is an option for our organization.

Response:

DHS appreciates the interest in and enthusiasm for the development of the Life360 HOME program. To answer the commenter's questions, the program's per member per month payment rate will not change from month to month or based on changes in caseload. It will remain the same regardless of changes in the home visiting provider's staffing or caseloads. The start-up and transportation funding will be per Life360 HOME hospital.

DHS acknowledges that there are different costs for each home visiting model and that may make the use of some models more financially viable than others. We encourage hospitals to consider using a mix of models, where possible, to ensure the funding can best serve the diverse needs of the mothers and babies in their communities.

Child Care Aware of Northwest Arkansas

Comment: I wanted to give some insight/public comment on the proposed Life 360 program. I would like to voice concerns on how the money is being allocated and that there should be more thought and focus on staff salaries of the program and who it reaches on the ground level.

Response:

DHS appreciates the commenter's interest in the program. The funding structure of the program provides key areas of resources (e.g., technology, start-up funding), but allows—and expects—the funding to be to cover staffing costs. DHS recognizes that the most important cost of this program's success will be the people implementing it.

Bob and Kay Burton, Co-Founders

Inspired Communities Foundation

Comment: INSPIRED COMMUNITIES FOUNDATION - WHO WE ARE

Established in 2008, the Inspired Communities Foundation is a small 501(c) 3 evidence-based at-risk home visiting organization offering Parents as Teachers and Healthy Families America programs in four counties (Stone, Izard, Fulton, and Sharp) in north central Arkansas as part of the Arkansas Children's Hospital Home Visiting Network. Our organization has had consistently high marks in quality, participated in a number of pilot programs and has created a unique and successful program (Baby Bucks) to establish and maintain lifelong healthy habits and behaviors in children and adults.

THE NEED

None of the counties we serve have maternity care services, with the nearest maternal hospitals in Jonesboro, Mountain Home, Searcy, and Batesville. In addition, three counties to our east, (Lawrence, Clay, and Randolph), have no obstetrical and no home visiting services. This leaves a huge swath of our region (seven counties, 4,385 sq. miles) as secondary hospital markets without maternity care. Inspired communities foundation is uniquely positioned with the infrastructure, programs. expertise, quality and motivation to help solve this problem.

We live in a maternity care desert, meaning there are no obstetric hospitals or birth centers and no obstetric providers. According to Dr. Zsakeba Henderson, March of Dimes senior vice-president, "Many people don't know that we are in a maternal and infant health crisis in our country. Our country is currently the least safe to give birth and be born in among the industrialized countries, and ... part of that problem is not having access to high quality maternity care. We have failed moms and babies too long in our country, and we need to act now to improve this crisis."

One of the counties which Inspired Communities Foundation serves and in which we live, Stone County, has an infant death rate (14.7) that ranks 75th of 75 counties in a state that ranks 47th of 50 (Mortality in the United States-National Center for Health Statistics 2020). If Stone county were a country it would rank just behind Syria at 123rd in the world. (World Atlas). Two more of the counties the ICF serves have above the US average (5.42) in Infant mortality - Izard 8.9, Sharp 6.3 with Fulton at 3.6. (Mortality in the United States-National Center for Health Statistics 2020).

Families and women with high-risk pregnancies need high-risk care.

OUR APPROACH

The Healthy Families America program we offer begins with a comprehensive assessment of all the issues, support or lack of support, medical and economic issues impacting the family. In one case, a young family was living without electricity, transportation or water, and the father would hitch-hike each day to his job. The HFA program enabled us to work with the family to find ways they could solve their problems and enable the children to thrive. This story had a happy ending.

Dr. Henderson from the March of Dimes also stated, “We also know that improving the social and economic conditions and quality of healthcare at all stages in a woman’s life will help mitigate some of the issues of access to maternity care, because how healthy a woman is before pregnancy impacts how well she does and what complications she may have and the health of that baby from pregnancy.”

Our own Department of Health has concluded that the Healthy Families America program is very effective. We believe that a broad approach is the most effective and efficient helping families solve problems and creating a family that encourages the child to thrive. This is especially true for families with multiple risk factors. “In a retrospective case-control study that evaluated a project of intensive home visiting following the Nurse Family Partnership and Healthy Families America models, they found that infants whose families did not participate were 2.5 times more likely to die compared to those whose families participated” (from Data to Action, A Background Paper on Infant Mortality, Arkansas Department of Health, March 2012).

As noted earlier, the Inspired Communities Foundation offers the Parents as Teachers (PAT) and Healthy Families America programs (HFA). Both programs are proven and effective and have a lasting impact upon young lives. The approach of both programs, however, is different, The PAT program is geared to enhancing child development, while the HFA program is broader and encompasses the total environment of the family. HFA is a very comprehensive approach and is the best choice for families with multiple risk factors. In counties where only PAT is available, the population will benefit greatly from participation.

Our experience however, has been that the HFA model is better suited to deal with the many social and economic barriers, and broader family issues which contribute to high-risk pregnancies. However, the proposed Maternal 360 reimbursement system, would steer services toward PAT even though it may not be the best program for the baby and family. Our Director Amy Jo Grissom notes that under the guidelines we have been provided, the PAT program will also cost the state more, have fewer visits with families, and emphasize enhancing child development instead of assisting the family in broader issues that affect pregnancies and children’s health. Again, the PAT program is a wonderfully effective child development program that will benefit mothers and babies, but if HFA is available it is usually the best fit in high-risk families.

ISSUES

High Need Secondary Markets

All of the counties served by the Inspired Communities Foundation are secondary hospital markets. It is logical to assume that the hospitals will seek to establish services through Maternal 360 in their primary markets first. This may result in the secondary markets receiving inadequate resources in the face of compelling needs. Establishing staff at the hospital and offering services in the primary hospital market

will probably not leave enough resources for the secondary markets. The hospitals do not have guidelines of how much should be shared with the home visiting agencies. This can create disparities and inadequate resources, especially in secondary markets where the need is highest. The hospitals will want to serve their primary market first since that is their community base with the people they see at the supermarket and the country club.

The funding model proposed by Maternal 360 looks at the problem through the lens of the individual hospital and this is a very logical position. However is it easy to see that the Maternity Care Desert in North Central Arkansas and third world type infant death rates needs a regional approach.

Response:

DHS recognizes the troubling issues Arkansas has with maternal and infant morbidity and mortality. Our deep concern over the health problems that too many mothers and babies face in our state is at the core of the creation of Maternal Life360 HOMEs. We also admire the work of HFA and PAT and hope both models will be part of making Maternal Life360 HOMEs successful.

We are also concerned about the areas of the state that lack birthing hospitals and OB/GYNs. While DHS has limited ability to address those specific issues directly, we believe Life360 HOMEs can spread pre and postnatal home visiting to these "maternity care deserts." We hope and anticipate that hospitals that choose to become Maternal Life360 HOMEs will provide home visiting services in counties beyond their typical service footprint. We fully agree with Dr. Henderson that "improving the social and economic conditions and quality of healthcare at all stages in a woman's life will help mitigate some of the issues of access to maternity care," We hope our Maternal Life360 HOME program contributes to making those improvements.

We understand the concern around the amount of funding Life360 HOMEs will share with their chosen partner organizations. While we have no requirements around that issue, we anticipate it will be negotiated between the hospital and its partner to the satisfaction of both parties.

Comment: Reimbursement Issues

Start-up costs

Our understanding is that there will be two startup payments to the hospitals of \$50,000 each with a negotiated share going to the home visiting programs plus \$300.00 per month per family enrolled. Our cost to establish a home visitor is about \$45,000 per year. This does not include the necessary indirect costs of rent, utilities, affiliate fees, accounting fees, office supplies, internet cost, or postage. This means that about half of the startup payments going to the hospital would be need to be shared with the home visiting agency for one home visitor. Again, if the hospital establishes a relationship with a home visiting agency in their primary market and retains (as it should) funding to offset their own costs, little or nothing will be left for other Arkansas counties with third world infant death statistics.

Response:

We understand the concern around the amount of funding Life360 HOMEs will share with their chose partner organizations. While we have no requirements around that issue, we anticipate it will be negotiated between the hospital and its partner to the satisfaction of both parties.

We also expect start-up funding to be used to recruit and employ staffing for the Life360 HOME program, including home visitors. Our Life360 application process requires hospitals to pass a readiness review before they can begin serving clients. That means the first round of start-up funding must be used to employ staff to be ready to serve clients to pass the readiness review.

Comment: Billing Per Family Per Month

The start-up funding would be offset by the billing per family. However, it takes time (4-12 months) to build up a caseload. The home visitor would also need to leave enough room in their caseload for new families. What happens when the home visitor has reached capacity and cannot accept new patients or risk a violation of HFA or PAT program fidelity?

In a series of e-mails, our director received the following clarification of the proposed \$300 month payment and how it compares against the reimbursement for PAT and HFA.

The \$300 month. Payment is for enrolled families only. In the beginning, when the home visitor is building a caseload and they have 6 families, the reimbursement will only be \$1,800 for that month with a cost of \$4,100.

An average full caseload for Healthy Families America is 15 families seen weekly. An average full caseload for Parents as Teachers is 20 families seen twice monthly. If we choose to use the HFA program (which is the best program for families with risk factors), the total will be \$54,000 per year for a home visitor with a full caseload, who is completing 60 visits per month. On the other hand, if we choose to use the PAT program, the total will be \$72,000 for a home visitor with a full caseload, who is completing 40 visits per month.

Reimbursement at \$300 per month per family:

Maximum caseload

HFA 15 Families (60 visits month) \$54,000 yr.

PAT 20 Families (40 visits month) \$72,000 yr.

A more reasonable case load is 80 to 90 per cent. This is how the funding would work at an 80 per cent caseload.

80 per cent caseload

HFA 12 Families (60 visits mo.) \$43,200 yr.

PAT 16 Families (40 visits mo.) \$57,600 yr.

After the home visitors are established beyond the start-up period, the total cost to maintain a home visitor is about \$55,000 per year. The reimbursement for the best program for high-risk pregnancies and families (HFA) is inadequate.

Our understanding is that we can choose which program to use. From a financial and efficiency standpoint, the PAT program would seem to be the obvious choice, but perhaps not the best choice for all families where HFA is also offered. Assuming a cost of about \$50,000 per year to maintain a home visitor, and a caseload at 80 percent would not cover costs.

Travel

The budget of \$50,000 for travel is excessive. About \$40,000 could go to people and infrastructure and still be adequate.

Response:

DHS expect start-up funding to be used to recruit and employ staffing for the Life360 HOME program, including home visitors. Our Life360 application process requires hospitals to pass a readiness review before they can begin serving clients. That means the first round of start-up funding must be used to employ staff to be ready to serve clients to pass the readiness review. Passing readiness review will trigger a second round of start-up funding which can be used to support staff salaries while home visitors are building their caseloads.

DHS acknowledges that there are different costs for each home visiting model and that may make the use of some models more financially viable than others. We encourage hospitals to consider using a mix of models, where possible, to ensure the funding can best serve the diverse needs of the mothers and babies in their communities.

Comment: WHAT CAN BE DONE

Place Resources in Areas of Great Need

With the grievous state of infant health in some of our counties, the Maternal Care Deserts in Arkansas represent a compelling need. These high-need, under-resourced areas need more home visitors who bring positive changes. It is suggested that the Maternal Care Deserts be designated as under-resourced and receive additional funding for maternal services and home visitors.

It may be tempting to assume that a home visitor could be based in the hospital's primary market community but also serve the secondary markets of four other counties. We see several problems with this approach. The home visitor will fill their caseload with the families that are closer to home. Also, long distances tie up valuable time, and coordination of services over a five-county area is extremely difficult and time consuming.

Also, the HFA program is geared for county level activities. For instance, Group Meetings (required by HFA) simply will not be attended if the distance is more than a few dozen miles (assuming the families have transportation). Over distances that could be over 100 miles between visits and with all the

activities that surround each visit, the more geographically spread out the caseload, the smaller the caseload will be. Time spent traveling is time not spent with a family. It is not just a question of travel money, it is the complications, complexity and time that would accompany the effort to get the family to the resources and the resources to the family.

We propose enough HFA home visitor funding to provide:

Two additional HFA home visitors in Stone County.

Two HFA home visitors in each of Clay, Randolph, and Lawrence Counties (currently with no home visiting infrastructure).

One additional HFA home visitor in IZARD County.

One additional HFA home visitor in Sharp County.

A registered nurse to oversee the relationship with the hospital/providers and integrate the healthy habits and behaviors program and HFA health issues into the fabric of our communities.

Another important issue is to provide funding for small hospitals for maternal services. Stone County has a good hospital as part of the White River Hospital System. The problem is that there are economic barriers for small hospitals to offer maternity services or to become birthing hospitals. Perhaps there are ways in which some additional services could be offered through better reimbursement and strategic relationships with high-risk pregnancy resources.

Expand Medicaid Postpartum Coverage

The state of Arkansas can expand the Medicaid postpartum coverage period from 60 days to 12 months, an option made available by the American rescue Plan Act of 2021. Two dozen states and Washington, D.C., have done this as of August.

The fact that a county in Arkansas has three times the national average of infant deaths, is a stain on the health of our children.

But, it is a problem that can be solved. If the Maternal 360 Program places resources in areas of great need instead of taking a "One size fits all" approach, we can begin to slowly address the issues creating poor outcome for our most vulnerable babies and families.

Arkansas has some of the best minds, best technology and the most passionate and caring people in the world. We can solve this problem. It is a matter of finding the best way to match high-risk resources with the needs of high-risk families.

Inspired Communities Foundation is uniquely positioned with the infrastructure, knowledge, experience, geographic presence, and passion to serve and let the babies live.

Response:

DHS is similarly concerned about the areas of the state considered maternity care deserts, and while we have limited ability to address those specific issues directly, we believe Life360 HOMEs can spread pre- and postnatal home visiting to these regions. The Life360 HOME provider manual does not limit the number of counties around the hospital's home county

that can be included in the Life360 service area. As part of the application process, DHS will assess whether the applicant hospital can serve the selected service area adequately or it needs to be adjusted. We will encourage hospitals that choose to become Maternal Life360 HOMEs to provide home visiting services in counties beyond their typical service footprint.

While the Maternal Life360 HOMEs are statutorily required to be birthing hospitals, we do not require that home visitors themselves must be based in the hospitals. In fact, we hope and anticipate home visitors will be based in their home counties, so they understand the needs and available resources of their community.

We also hope that the Maternal Life360 HOMEs will see the value and financial viability of serving counties considered maternity care deserts. Because Maternal Life360 HOMEs can serve both ARHOME enrollees and women enrolled in other Medicaid programs, we believe there will be enough families to serve in these traditionally underserved areas to support events (like group meetings) locally.

DHS understands the interest in expanding Medicaid eligibility to women from 60 days postpartum to 12 months. Although that provision is outside the parameters of the Life360 program, it should be noted that the Maternal Life360 HOME will allow ARHOME enrollees to continue receiving the Life360 home visiting services even if they lose Medicaid eligibility.

Bo Ryall, President & CEO

Arkansas Hospital Association

Comment: The Arkansas Hospital Association (AHA) is a membership organization that proudly represents more than one hundred healthcare facilities and their more than 50,000 employees as they care for all residents of our rural state. Hospital doors are always open, and during the pandemic our hospitals have provided health services to the thousands of Arkansans seeking care for COVID-19, while also acting as essential partners in public health's pandemic response effort. The Association works to support, safeguard, and assist our members in providing safe, high-quality, patient-centered care in a rapidly evolving – and highly regulated – healthcare environment.

The AHA sincerely appreciates the opportunity to comment on Arkansas's Life360 HOME Program proposed rule. Arkansas hospitals are not only the backbone of the Arkansas healthcare system through the delivery of emergency services, inpatient care, and outpatient care – hospitals are also already key components to the health of the communities where they serve. Hospitals fully recognize the importance of social, environmental, and behavioral factors as well as genetic and health care factors that impact a person's health. The AHA applauds the State for developing an innovative approach to fostering community health. Funding hospitals that volunteer to serve as "Life360 HOMEs" to identify and connect beneficiaries to social services, including integrating these services into their care delivery models, encouraging partnerships with community-based organizations, tracking social needs, and incentivizing a more holistic approach, has the potential to truly benefit those most in need in our state.

The success of the Life360 program depends on its ability to enroll interested hospitals and to support the provision of the enhanced services unique to the model. AHA has serious concerns that the proposed fee structure is insufficient to fulfill either. For example, the largest of the Life360

programs, the Maternal Life360 HOME, has evidence-based home visiting as an essential component of the model. However, an analysis from one such program suggests that start up funds should be at least 50% higher (\$150,000 versus \$100,000) and per-member-per-month rates double those proposed (\$600 vs. \$300), based on known program expenses. While some hospitals may take a chance on the model, most will be very hesitant to participate in a program that does not cover their costs – especially at a time when reimbursements for traditional, acute-care hospital services are not keeping pace with increased costs of labor and supplies. We encourage the State to invest more financial resources into the program to promote its success.

Thank you, again, for the opportunity to comment on the Arkansas Life360 HOME Program proposed rule. The Arkansas Hospital Association and its members are offering these comments in a spirit of collaboration with the goal of successful and timely implementation of this innovative program. We stand ready to work with the State and other stakeholders to address the issue raised in our letter and to ensure the program's overall success for Arkansas's hospitals and, most importantly, the patients and families that our hospitals are so honored to serve.

Response:

DHS appreciates the interest in and enthusiasm for the development of the Life360 HOME program and values the partnership with the state's hospitals and the Arkansas Hospital Association in this endeavor.

DHS acknowledges the different costs for each home visiting model that may make the use of some models more financially viable than others. We encourage hospitals to consider using a mix of models, where possible, to ensure the funding can best serve the diverse needs of the mothers and babies in their communities.

DHS continues to gather information on what would be an appropriate per member per month payment rate for Maternal Life360 HOMEs. We will publish a final rate sheet prior to program implementation.

Brittany McAllister

National Service Office for Nurse, Family, Partnership and Child First

Public hearing held remotely on October 20, 2022, at 10:00 a.m.

Comment: Thank you and good morning. My name is Brittany McAllister. I'm with National Service Office for Nurse, Family, Partnership and Child First. I would like to thank the Department and the Administration for recognizing value at home based visiting models, especially evidence-based models like nurse, family partnership is an evidence-based home visiting models with over forty-five years of research, showing that it produces improvements in maternal and child health and development both over the short and long term. N.F.P. utilize registered nurses work with low-income moms from as early in their pregnancy as possible until their first child turns two years old. The nurses provide the trusted expertise. The moms need to have a healthy pregnancy to become a nurturing mother and parent a healthy child. We're grateful for the opportunity to provide comments and support of the effort to cover evidence based on visiting services through maternal life. We do, however, have concerns about implementation, and ultimately, then the success of the program. If the startup funding and per member per month rate are insufficient for working hospitals to provide services to the women in their

community. Evidence based models remain the gold standard and the home visiting field because they have staff providing on going technical assistance to ensure that the program is implemented with fidelity. That is in the way that will produce the same outcomes that the research has shown. This requires both upfront and ongoing training fees. Additionally, models like N.F.P., that utilize registered nurses must offer market-based salaries in order to compete in today's health care workforce landscape. Recently Alabama Medicaid began offering a seven hundred and twenty dollar per member per month rate to ensure adequate cost coverage for this programming and the seen tremendous interest and rapid by partners in various areas of the State. We suggest that in Arkansas per member per month rate of between six hundred and seven hundred and twenty per month, dependent on birthing hospital budgets, area cost of living and evidence-based model requirement would be an appropriate target range for this program. We also know that is may be beyond the purview of this particular set of rules that we encourage DMS to explore ways to provide a full two-years postpartum and funding for women on all categories and Medicaid assistance. N.F.P, provided services for those first two years because the evidence has shown that this timing is what is needed the most robust long-term positive outcomes. We're also thankful for the recognition that telehealth should be an accepted modality for these models when necessary. During the COVID 19 pandemic F.T.P. provided shifted to providing telehealth services to keep our clients and their baby safe, while we're now able to see family safely in person when taking the appropriate precautions, telehealth may still be appropriate in some situations and unfortunately, there's no guarantee that a client will have an internet connection or device that support video-based telehealth. N.F.P. nurse recognize the value of in person services, and when not possible, video-based telehealth services that there will be instances where client simply cannot connect to a video-based modality. We would like to request that video-based telehealth be a recommendation rather than a requirement for service delivery reimbursed through Medicaid. We appreciate the continued opportunities to work with DMS and this tremendous effort and are looking forward to ongoing conversations with DMS. For everything, hospitals, and other stakeholders about how we can best serve low-income Arkansas moms within our family partnership. Thank you so much.

Response:

We admire the work of NFP and hope the model will be part of making the Maternal Life360 HOME program successful.

DHS continues to gather information about what an appropriate per member per month payment rate for Maternal Life360 HOMEs would be. We will publish a final rate sheet prior to program implementation.

We also understand the value in ensuring the home visitors serving Maternal Life360 HOME clients have all appropriate training necessary, and we continue to work with our hospital and home visiting partners to determine the best way to fund and deliver it.

DHS also recognizes the value of delivering Maternal Life360 HOME services in person in clients' homes. We also appreciate the commenter's support of our proposed rules allowing for services to be delivered through other means, including video-supported telehealth visits, when necessary. We also recognize many of our clients have limited internet access, and we do not have any plans to require clients to use telehealth services

DHS appreciates commenters' suggestion that Arkansas Medicaid expand postpartum coverage. We continue to explore all available policy options to best serve pregnant women in Arkansas and their families.

Audrey Zavaleta, Executive Director

Family Network NWA

Comment: Our home visitors became almost unable to accomplish what was required by HFA because of families being in such an intense crisis without food, losing their housing, etc.

Our intention with the case manager was to alleviate some of those tasks so our home visitors can focus on the parent-child relationship, child development, goal setting, etc. Our case manager is currently funded by UAMS through their Community Health Worker funding that is a 2 year funding process. I think it would be interesting to talk with the hospitals about the need for this kind of service. It also brought to mind our frequent need for doula services, which ties into maternal care. We often have mothers that have zero support during their labor process, either because they're a single parent, recently immigrated here, or because they don't speak English. We know having a doula present for labor and available postpartum can greatly boost maternal and infant health outcomes around birth.

And finally I'm attaching here a quick breakdown of the home visitor position costs that we at Family Network have on average. *(See table below response)* I broke it down for the first year (with initial training costs, equipment costs) and then following years. I also included a supervisor position. Again, these are costs that we have here at Family Network, so it might vary per agency.

Response:

DHS appreciates the challenging work currently being done by the state's home-visitors to serve families in crisis. We hope to leverage and expand the existing work being done. We also appreciate the partnership of other health professionals in the continuum of care for pregnancy and postpartum care.

We also appreciate the information on home visitation staff positions needed, their salaries and other costs of providing services.

Staff position costs:

Home Visitor: 1 FTE Start up Year

Categories:	Calculated From:	Total Cost:
Annual Salary:	\$16.50 X hour	\$34,320
Benefits (Fringe and Health Insurance Stipend)	\$2,699	\$2,699
Travel Cost Annually 6,500 miles per IRS rate	\$,625	\$4,062
Computer Software		\$750
HV expenses within site (affiliation fees, curriculum fees)		\$923
Training		\$700
		Total Cost: \$43,454

Home Visitor: 1 FTE

Categories:	Calculated From:	Total Cost:
Annual Salary:	\$16.50 X hour	\$34,320
Benefits (Fringe and Health Insurance Stipend)	\$3,899	\$3,899
Travel Cost Annually 6,500 miles per IRS rate	\$,625	\$4,062
Computer Software		\$0
HV expenses within site (affiliation fees, curriculum fees)		\$923
Training		\$0
		Total Cost: \$42,004

Supervisor: 1 FTE First Year

Categories:	Calculated From:	Total Cost:
Annual Salary:	\$18.00 X hour	\$37,440
Benefits (Fringe and Health Insurance Stipend)	\$2,936	\$2,936
Travel Cost Annually 1,000 miles per IRS rate	\$.625	\$625
Computer Software		\$750
HV expenses within site (affiliation fees)		\$524
Training		\$950
		Total Cost: \$43,225

Supervisor : 1 FTE

Categories:	Calculated From:	Total Cost:
Annual Salary:	\$18.00 X hour	\$37,440
Benefits (Fringe and Health Insurance Stipend)	\$2,936	\$2,936
Travel Cost Annually 6,500 miles per IRS rate	\$.625	\$625
Computer Software		\$
HV expenses within site (affiliation fees)		\$524
Training		\$
		Total Cost: \$41,525
