GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Health Care Finance

Office of the Deputy Director/Medicaid Director

Medicaid Director Letter # 21-04 (rev.)

TO: All Interested Parties

FROM: Melisa Byrd
                  Senior Deputy Director and State Medicaid Director

DATE: January 6, 2022

SUBJECT: Implementation of an Integrated Medicare-Medicaid D-SNP Program Effective
                  February 1, 2022

Purpose

This document supplements and updates Medicaid Director Letter # 21-04, issued on September 3, 2021. The purpose of this Medicaid Director Letter is to inform all stakeholders that, effective February 1, 2022, DHCF will expand its "Dual Choice Program" by consolidating the delivery of all covered D.C. Medicaid benefits through the enrollee's selected D-SNP, subject to the following limitations:

A. Dual choice enrollees who are also enrolled in the 1915(c) Persons with Intellectual and Developmental Disabilities (IDD) or Individual and Family Support (IFS) waivers, or residing in an intermediate care facility (ICF) may enroll or remain enrolled in a D-SNP, but for **Medicare benefits only**. Delivery and payment for D.C. Medicaid benefits for these enrollees will continue on a fee-for-service basis by DHCF. Similarly, there will not be any changes to the authorization processes for ICF or IDD and IFS waiver benefits.

B. For any enrollee, community-based behavioral health services (e.g., MHRS and ASARS) are also excluded from the Medicaid coverage under the D-SNP. Medicaid coverage for these services will be authorized and reimbursed through the same processes by which they are now.

This Medicaid Director Letter was initially published September 3, 2021. This revision updates the implementation date.

Discussion

A. Applicable Terminology

Dual Eligible Special Needs Plans (D-SNPs) are Medicare Advantage (MA) plans that only enroll members who are dually eligible for both Medicare and Medicaid. Federal law requires any MA Organization (MAO) operating or planning to operate a D-SNP within the District to contract with DHCF. These are called State Medicaid Agency Contracts (SMAC). Effective 2022, the MAO operating a D-SNP in the District of Columbia is UnitedHealthcare.

The "Dual Choice Program" refers to the system of consolidated service delivery of both Medicare and Medicaid benefits by the D-SNP selected by dually eligible enrollees.

B. Programmatic Rationale

DHCF is expanding the Dual Choice program consistent with its mission to improve health outcomes of District residents. As mentioned earlier in this document, DHCF is required to have SMACs in place with all D-SNPs operating within the District. While the SMACs must meet specific regulatory requirements, DHCF is both permitted and encouraged to include additional elements that advance its programmatic goals for dually eligible enrollees. Expanding the Dual Choice program aligns with the agency's reform efforts to promote a health care system that provides whole person care and improves health outcomes. Dually eligible enrollees navigate the Medicaid and Medicare systems and may experience greater fragmentation of care across their joint Medicare and Medicaid coverage. By expanding its Dual Choice program, DHCF expects to improve health outcomes through more comprehensive care coordination, deduplication of services, and integration of primary and specialty care for this vulnerable population.

Contact

DHCF has updated Frequently Asked Questions content regarding the forthcoming changes to the Dual Choice Program, available at https://dhcf.dc.gov/page/more-information-frequently-asked-questions-about-district-dual-choice-and-d-snps. Please review this content, and let us know if you have any questions or feedback. For any inquiries regarding the Dual Choice program expansion, please contact Brittany Branand, D-SNP Program Coordinator, Long Term Care Administration at Brittany.Branand@dc.gov or 202-478-5806.

Cc: DC Hospital Association
DC Primary Care Association
DC Health Care Association
DC Home Heath Association
DC Coalition of Disability Service Providers