

Aligning the RWHAP Policy with the Health Care Landscape: A Review of Select Policy Clarification Notices

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Learning Objectives

- **At the conclusion of this activity, the participant will:**
 - Identify and be familiar with the policy clarification notices (PCN) related to the current health care delivery system
 - Understand the programmatic and policy issues that the PCNs notices seek to address
 - Discuss the goals of HRSA/HAB PCNs to maintain clients' access to health care and health care coverage to improve HIV outcomes

Agenda

- **Role of the Ryan White HIV/AIDS Program (RWHAP) in the Healthcare Landscape**
- **2013 – 2014 Healthcare Landscape Related RWHAP Policies**
- **The Role of Vigorously Pursue**
- **2015 – 2016 Healthcare Landscape Related RWHAP Policies**
- **Group Discussion**
- **Wrap-up**

HIV/AIDS Bureau Vision and Mission

Vision

Optimal HIV/AIDS care and treatment for all.

Mission

Provide leadership and resources to assure access to and retention in high quality, integrated care, and treatment services for vulnerable people living with HIV/AIDS and their families.



HIV/AIDS Bureau Priorities

- **National HIV/AIDS Strategy (NHAS) 2020/ The US President's Emergency Plan for AIDS Relief 3.0 (PEPFAR)** - Maximize HRSA HAB expertise and resources to operationalize NHAS 2020 and PEPFAR 3.0
- **Leadership** - Enhance and lead national and international HIV care and treatment through evidence-informed innovations, policy development, health workforce development, and program implementation
- **Partnerships** - Enhance and develop strategic domestic and international partnerships internally and externally
- **Integration** - Integrate HIV prevention, care, and treatment in an evolving healthcare environment
- **Data Utilization** - Use data from program reporting systems, surveillance, modeling, and other programs, as well as results from evaluation and special projects efforts to target, prioritize, and improve policies, programs, and service delivery
- **Operations** - Strengthen HAB administrative and programmatic processes through Bureau-wide knowledge management, innovation, and collaboration

Role of the RWHAP and the Health Care Delivery System

- The Ryan White HIV/AIDS Program (RWHAP) provides a comprehensive system of care through HIV specialty care, primary care, and support services for low-income people living with and affected by HIV
- The RWHAP facilitates progress along the HIV care continuum via an interdisciplinary and public health approach
- The evolving health care landscape changed health care coverage options for many RWHAP clients
- The RWHAP is the payor of last resort for services not covered or not fully covered by other forms of health care coverage

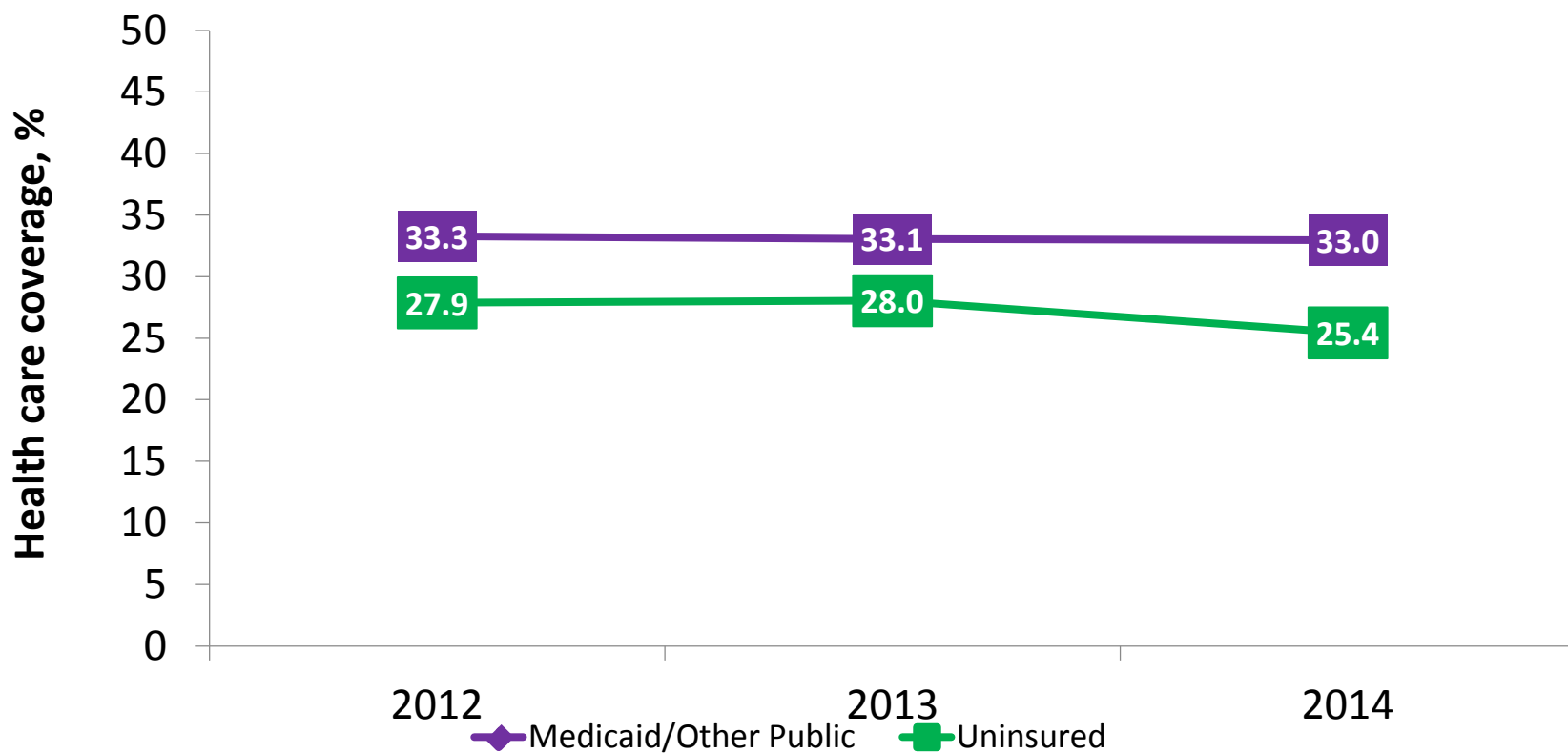
HAB Implementation of the RWHAP and Health Care Integration

- Providing additional guidance as needed
- Providing on-going technical assistance highlighting best practices
- Evaluating RWHAP client health care needs in evolving health care landscape
- Consider new ways of distributing RWHAP funding in context of new resources in the health care environment

Collaboration with Centers for Medicare and Medicaid (CMS)

- Engage with colleagues in CMS/ Consumer Information and Insurance Oversight (CCIIO) on key issues:
 - Review Notices of Proposed Rule Making
 - Develop and co-host webinars on relevant topics, including talking with Assisters about the RWHAP
 - Monitor insurance premium assistance payments by RWHAP
 - Monitor mail order pharmacy requirements
 - Monitor prior authorization/utilization management requirements
 - Support Essential Community Provider list

Health Care Coverage Among PLWH RWHAP (non-ADAP) Clients, 2012–2014



Ryan White HIV/AIDS Program 2013 – 2014 Health Care Landscape Related Policies

Major Area of Focus in 2013/2014: Health Care Landscape Related Policies

- **RWHAP payor of last resort requirement, vigorously pursue and rigorously document**
- **Options for grant recipients to use RWHAP funds for premiums and cost sharing for Medicaid and private insurance**
- **Standards for core medical service waivers for RWHAP Parts A, B, and C**
- **Information on allowable outreach and enrollment activities**
- **Guidance on premium tax credits and reconciliation**

Policies Released by HAB in 2013-2014

- **13-01 Clarifications Regarding Medicaid-Eligible Clients and Coverage of Services by Ryan White HIV/AIDS Program**
- **13-02 Clarifications on Ryan White Program Client Eligibility Determinations and Recertifications Requirements**
- **13-03 Ryan White HIV/AIDS Program Client Eligibility Determinations: Considerations Post-Implementation of the Affordable Care Act**
- **13-04 Clarifications Regarding Clients Eligible for Private Health Insurance and Coverage of Services by Ryan White HIV/AIDS Program**
- **13-05 Clarifications Regarding Use of Ryan White HIV/AIDS Program Funds for Premium and Cost-Sharing Assistance for Private Health Insurance**
- **13-06 Clarifications Regarding Use of Ryan White HIV/AIDS Program Funds for Premium and Cost-Sharing Assistance for Medicaid**
- **13-07 Uniform Standard for Waiver of Core Medical Services Requirement for Grantees Under Parts, A, B, and C**
- **14-01 Clarifications Regarding the Ryan White HIV/AIDS Program and Reconciliation of Advance Premium Tax Credits Under the Affordable Care Act**

Program Letter: RWHAP Outreach, Enrollment and Benefits Counseling, 2013

RWHAP Parts A & B	RWHAP C & D
<p>Early Intervention Services funding may be used for <u>benefits counseling</u>, <u>enrollment</u>, and <u>outreach education</u></p>	
<p>Medical Case Management Services funding may be used for <u>benefits counseling</u> and <u>enrollment</u></p>	<p>Medical Case Management Services funding may be used for <u>benefits counseling</u> and <u>enrollment</u></p>
<p>Non-Medical Case Management Services funding may be used for <u>benefits counseling</u> and <u>enrollment</u></p>	<p>Non-Medical Case Management Services funding may be used for <u>benefits counseling</u> and <u>enrollment</u></p>
<p>Health Education/Risk Reduction Services funding may be used for Affordable Care Act <u>outreach education</u></p>	

Program Letter: RWHAP Outreach, Enrollment and Benefits Counseling, 2013

RWHAP Parts A & B	RWHAP C & D
<p>Outreach Services may be used for Affordable Care Act <u>outreach education</u></p>	<p>Outreach Services <u>(PART C)</u> funding may be used for Affordable Care Act <u>outreach education</u></p>
<p>Referral for Health Care/Supportive Services funding may be used for <u>benefits counseling</u>, <u>enrollment</u>, and <u>outreach education</u>, as the Affordable Care Act is considered a benefit to PLWH</p>	
<p>Minority AIDS Initiative <u>(PART B)</u> funding may be used for <u>outreach education</u>, <u>benefits counseling</u>, and <u>enrollment</u></p>	

The Role of Vigorously Pursue

Guiding Principles for Vigorously Pursue

- Health care coverage is a good thing for PLWH
- RWHAP is still needed to serve its mission
- Maintaining continuity of care is critical
- Enrolling people in coverage is a continuous process, not a one-time activity
- Enrolling into the private health care insurance plan may be a difficult transition for a small portion of our population
- Organizations need to create policies and procedures and maintain documentation

Payor of Last Resort Requirements Within the Context of Public and Private Coverage

- By statute, RWHAP funds may not be used “for any item or service to the extent that payment has been made, or can reasonably be expected to be made...” by another payment source
- Recipients must vigorously pursue enrollment in other relevant funding sources
- RWHAP recipients must assess individual clients that are not eligible for public programs or eligibility for private insurance. The RWHAP will continue to pay for items or services received by individuals who remain uninsured or underinsured

Framework for Vigorously Pursue

Vigorously Pursue allows for a process that ensures that PLWH continue to receive care and treatment services while being informed, educated and enrolled into eligible coverage systems. *RWHAP is the payor of last resort throughout this process so that PLWH are not lost to care or lose access to medications.*

Ryan White HIV/AIDS Program 2015 – 2016 Health Care Landscape Related Policies

Major Areas of Focus in 2015-2016: Program and Operational Guidance

- Clarifications on 10% administrative cap
- Guidance on HIV care continuum and RWHAP services
- Guidance on fiscal management and reporting of program income and pharmaceutical rebates
- Guidance on the expectations for clinical quality management
- Updates to address changes in care services for veterans
- Updates and clarifications for service categories

Policies Released by HAB in 2015-2016

- **15-01 Treatment of Costs under the 10% Administrative Cap for RWHAP Parts A, B, C, and D**
- **15-02 Clinical Quality Management Policy Clarification Notice**
- **15-03 Clarifications Regarding the Ryan White HIV/AIDS Program and Program Income**
- **15-04 Utilization and Reporting of Pharmaceutical Rebates**
- **16-01 Clarifications of the Ryan White HIV/AIDS Program Policy on Services Provided to Veterans**
- **16-02 Ryan White HIV/AIDS Program Services: Eligible Individuals & Allowable Uses of Funds**

Cross-Walk of RWHAP Services and the HIV Care Continuum – Program Letter, 2015

The purpose of the crosswalk is to highlight those services that most directly support improved outcomes that support the care continuum. *Note: this table is not meant to be an exhaustive list of services provided by RWHAP*

		<u>HIV Diagnosis</u>	<u>Linked to Medical Care</u>	<u>Retained in Medical Care</u>	<u>Prescribed ART</u>	<u>Viral Suppression</u>
Core Medical Services						
RWHAP Part	Ryan White HIV/AIDS Program Service					
B	AIDS Drug Assistance Program (ADAP) Treatments		X ¹	X	X	X
A, B	AIDS Pharmaceutical Assistance				X	X
A, B	Early Intervention Services (EIS)	X	X			
A, B, C	Home and Community-Based Health Services			X		
A, B, C	Home Health Care			X	X	X
A, B, C, D	Medical Case Management		X	X	X	X
A, B, C, D	Outpatient/Ambulatory Health Services	X	X	X	X	X
A, B, C, D	Substance Abuse Outpatient Care		X	X	X	X

Group Discussion

- **What are your experiences with operationalizing these policies?**
- **What challenges exist?**
- **Is further clarification or technical assistance needed?**

Where to Find Policy Clarification Notices

- All Program Clarification Notices and Letters can be found at: <http://hab.hrsa.gov/manageyourgrant/policiesletters.html>

Obtaining CME/CE Credit

If you would like to receive continuing education credit for this activity, please visit: <http://ryanwhite.cds.pesgce.com>

Thank You!

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