

July 20, 2016

PUBLIC SUMMARY

SUBJECT: Summary of the Public Input for the Renewal of the Medicaid Medically Complex Children (MCC) Waiver Program and Transition Plan

The South Carolina Department of Health and Human Services (SCDHHS) held four public meetings on the proposed five-year waiver renewal for the Medically Complex Children's (MCC) Waiver and MCC Transition Plan. The public meetings, held across the state, were in the following locations:

- Florence, S.C. (June 2, 2016)
- Charleston, S.C. (June 7, 2016)
- Greenville, S.C. (June 9, 2016)
- Columbia, S.C. (June 14, 2016)

The meetings provided information about the Agency's intent to request a five-year renewal of the MCC home and community-based waiver program and the MCC Transition Plan, and allowed an opportunity for the public to comment. The public was provided the proposed renewal information and Transition Plan prior to the meetings. Copies of the proposed waiver renewal document, including the MCC Waiver Transition Plan, were made available for public review at the following location and websites:

- SCDHHS front lobby at 1801 Main Street, Columbia, S.C.
- SCDHHS website: <https://www.scdhhs.gov/public-notices>
- Family Connection of South Carolina website: www.familyconnectionsc.org
- South Carolina Developmental Disabilities Council website: www.scddc.sc.gov
- SCDHHS listserv

The public was also provided the opportunity to submit comments through the following addresses:

- SCDHHS Division of Community Options
Post Office Box 8206
Columbia, S.C. 29202-8206
- comments@scdhhs.gov

MCC Waiver Renewal Proposal

The state proposes renewing the waiver for an additional five-year period (2017-2022) with the following changes:

- Revise the Medicaid Intermediate Care Facilities for individuals with Intellectual Disability (ICF/IID) level of care criteria to clarify the developmental period is manifested before age 22 (from 18 years old);
- Address the Center for Medicare and Medicaid Services (CMS) HCBS Rule Transition Plan for setting requirements for home and community-based services received in a Pediatric Medical Day Care setting;
- Per legislation, revise the waiver entrance requirements to allow eligible family members of a member of the armed services to retain their status in the waiver or on the processing list;
- Revise the waiver performance measures to enhance quality assurance outcomes.

Summary of all Comments and Clarifications

- I. MCC Waiver Renewal
 - A. Revise the Medicaid ICF/IID Level of Care (LOC) Criteria
 - No comments received.
 - B. Revise waiver entrance requirements
 - A commenter asked: Is there a waiting list for the MCC Waiver?
 - *SCDHHS response: The waiver program utilizes a processing list, which allows for children to be served as soon as they meet all program criteria.*
 - C. Revise Performance Measures for Quality Improvement
 - No comments received.
 - D. Miscellaneous
 - A commenter asked: Does the day care facility have children without disabilities as well as with disabilities?
 - *SCDHHS response: The pediatric medical day care is a specialized service for children with complex medical conditions. It is not designed to serve children without disabilities.*
 - A commenter stated: The MCC Care Coordinators do a great job coordinating the waiver participants care with the foster care pediatricians.
 - A commenter suggested: An option be added to the referral form to list both the DSS caseworker and the foster parents.
 - *SCDHHS response: The comment box on the referral form is to be used for additional relevant information.*
 - A commenter stated: Foster children move around a lot and it would be helpful to have a website that includes all the MCC Care Coordinators, their contact information and the areas they serve.
 - *SCDHHS response: If a child moves to another geographical area the*

case could be transferred to another MCC Care Coordinator. The transfer would be determined by the field staff supervisor depending on assigned areas and caseloads. There are no plans to publish the MCC Care Coordinators' names and contact information.

- A commenter suggested: The MCC Care Coordinators attend IEP meetings to help advocate for services in the school.
 - *SCDHHS response: The MCC Care Coordinators attend IEP meetings when invited as schedules permit.*
- A commenter stated: The websites for the MCC waiver are outdated.
 - *SCDHHS response: SCDHHS has updated outdated website links. The link for the MCC waiver referral form is https://phoenix.scdhhs.gov/cltc_referrals/new*
- A commenter stated: After a referral is completed online a confirmation email is sent with only a confirmation number listed and if the referral was denied or accepted. The email does not list the reason for the denial or the status of the approved referral. A suggestion was made for the email to include more identifying information as well as the status of the referral.
 - *SCDHHS response: All referrals are assigned a number for confidentiality reasons to protect personal health information. Referrals are denied when there is an active referral in the system. The referral source can call and inquire about the status of the referral.*
- A commenter suggested: A box be added to the referral form that allows the referral source to list the child's diagnosis, therapies and specialists involved with the child.
 - *SCDHHS response: The referral form includes a comment box that can be used for additional relevant information.*
- A commenter asked: What types of activities fall under care coordination?
 - *SCDHHS response: The MCC waiver Care Coordination service requires a registered nurse (RN) to identify needs and monitor the health and welfare of the participant and incorporate these needs into a care plan. The care plan must address the individual's strengths, problems, needs, solutions and various resources for the family. The RN Care Coordinator evaluates and refers waiver participants to appropriate community or state programs. They coordinate long term and acute care with other providers to ensure the participant receives needed services. The RN Care Coordinators make monthly telephone contacts and quarterly face to face visits with the family/participant.*
- A commenter asked: Can pediatric palliative care be added as a waiver service?

- *SCDHHS response: Medicaid beneficiaries can receive palliative care through existing physician codes; therefore, there are currently no plans to add palliative care as a MCC waiver service.*
- A commenter asked: Can primary care case management by specialists be added as a service in the waiver?
 - *SCDHHS response: Specialists/subspecialists do not meet the requirements for the enhanced physician payment reimbursement. The enhanced payment is for primary care physicians who meet the monthly participant visit and team conference requirements, and perform all the primary care physician activities, such as the EPSDT well visits, immunizations, etc.*

II. MCC Waiver Transition Plan for Setting requirements received in a Pediatric Medical Day Care setting

- A commenter asked: Does person centered planning for children include the child as well as the adult?
 - *SCDHHS response: The child and parent/responsible party are included in the person-centered planning process.*