

Medicare PFS (Part B) 2024: The opportunity for Community Health Workers

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National Association of CHWs

National Academy for State Health Policy

Envision Equity (national TA provider for CDC 2109 CCR grantees)

Background: 2024 Medicare Physician Fee Schedule

- <https://www.federalregister.gov/d/2023-24184/page-78920>
 - Services Addressing Health-Related Social Needs
 - Community Health Integration Services (CHI)
 - Social Determinants of Health Risk Assessment
 - Principal Illness Navigation Services (PIN)
- Final rule published November 2023
- Implementing guidance memo expected late Spring or early Summer 2024

Basic provisions

- Community Health Integration (CHI) services (Part B)
 - can cover wide range of CHW activities
 - provided by “auxiliary personnel... incident to” clinical care
 - qualified personnel other than CHWS may be included
- Must be ordered by “billing provider” during an “initiating visit” – provider also responsible for general supervision
- Relates to SDOH that interfere with provider’s ability to diagnose and treat an identified medical condition
- Claims may only be submitted by one billing provider for a given patient
- Providers encouraged to partner with CBOs, but CBOs cannot bill directly

Community Health Integration Services

CHI Services List		
Person-Centered Assessment	Facilitating patient-driven goal setting	Providing tailored support
Practitioner, HCBS Coordination	Coordinating receipt of needed services	Communication with practitioners, HCBS providers, hospitals, SNFs
Coordination of care transitions	Facilitating access to community-based social services	Health education
Building patient self-advocacy skills	Health care access / health system navigation	Facilitating behavioral change
Facilitating and providing social and emotional support	Leveraging lived experience when applicable	

Billing and rates

- Billing on monthly basis: \$79 for first hour, \$49 each half hour in month, no limit (HCPCS G0019, G0022)
 - Lower rates for services provided in hospital or other facility (\$49 and \$34)
- Patient consent required, can be verbal
- Cost sharing by individual required under Medicare
 - Generally covered by another source
 - Preventive services have \$0 cost sharing
- Claims submitted first to Medicare third party administrator, except for individuals covered by Medicare Advantage plan (Part C)
 - Remaining authorized charges can be billed to Medicare Supplement plan

SDOH Risk Assessment

- 10 Part B benefit to complete an assessment of health-related social needs (HRSNs)
- 10 Must be performed as part of one of the following visit types:
 - 10 E/M (Medical Office) visit & TCM Visits
 - 10 Psychiatric diagnostic evaluation (CPT 90791)
 - 10 Health Behavior Assessment and Intervention (HBAI) services, described by CPT codes 96156, 96158, 96159, 96164, 96165, 96167, and 96168
 - 10 Annual Wellness Visit (AWV)
- 10 Requires the use of an evidence-based HRSN screening tool
 - 10 Examples
 - 10 CMS Accountable Health Communities (AHC) HRSN Tool
 - 10 PRAPARE: Protocol for Responding to & Assessing Patients' Assets, Risks & Experiences

Who Can Perform the SDOH Risk Assessment

- 10 The SDOH Risk Assessment must be performed as part of a medical office visit.
 - 10 HCPCS Code: G0136
 - 10 Rate: \$18.44
- 10 The eligible provider can obtain direct **assistance from staff** to complete the screen, but the **responsibility of completing the SDOH risk assessment remains with the billing provider.**

Key considerations (cont'd)

- Very limited state govt. roles in Medicare
 - Medicaid coverage for dual eligibles
 - Standard qualifications for CHWs (certification, training standards)
- Role of secondary insurers will be key
 - Most recipients have private Supplement or Advantage plan
 - Supplement plans will probably be required to cost sharing
 - Advantage plans' "plan of care" agreement won't include this until mid-2025, but they may be persuaded to cover it voluntarily
- CHW qualifications for states that do not have standards, e.g., certification
 - CMS will accept record of core training that meets C3 recommendations (www.c3project.org)

Webinar Dec 14, 2023:

“Medicare: CHW Financial Sustainability Strategy”

- Provided by Envision and NACHW
- View slides and video at <https://envisionequity.org/webinars>
(look under “Past Webinars”)