



STATE OF NEW YORK DEPARTMENT OF HEALTH

Corning Tower The Governor Nelson A. Rockefeller Empire State Plaza Albany, New York 12237

Richard F. Daines, M.D.
Commissioner

June 21, 2007

Dear ADHC and CFP Provider:

This letter is to inform you of revised policy concerning dual enrollment of clients in AIDS Adult Day Health Care (ADHC) Programs and COBRA Community Follow-up Programs. The revised policy guidance is delineated in the CFP **Technical Assistance Bulletin # 11B-07**, May 2007, and is enclosed for your reference. The effective date of this policy is September 1, 2007.

As with the previous policy guidance of the CFP Technical Assistance Bulletin #11A-03, March 2003, the revised policy guidance describes limited circumstances in which dual enrollment would be appropriate, and emphasizes avoiding duplication of case management services through case conferencing and the development of a joint case management plan. The revisions to the policy are detailed below:

- A client **cannot be dually enrolled in COBRA and ADHC for more than 60 days**.
- Upon admission to the ADHC, the program must determine if the client is currently enrolled in a COBRA program. If the client is enrolled in a COBRA program, the COBRA program must be contacted immediately so that a joint case conference can take place to determine if the client meets the criteria for dual enrollment *and if so, to develop a joint case management plan*. (Note: COBRA enrollment can be determined via Medicaid card swipe – code 35 denotes COBRA enrollment.)
- Prior to the expiration of the 60 day dual enrollment period, it is incumbent on the ADHC to arrange a case conference with the COBRA case manager and the client to make a determination as to where the client will remain in service.
- In cases of dual enrollment in which a joint case management plan is not documented at the time of referral, Medicaid claims for both providers will be considered unsubstantiated and may be denied. In addition, all claims by providers beyond the 60 day joint enrollment limit for any client subsequent to September 1, 2007 may be denied.

In the very near future, the AIDS Institute will provide you with a list of clients, identified by their Medicaid I.D. number, who are currently enrolled in both ADHC and COBRA services. The list will also identify the specific programs in which the client is dually enrolled. Prompt action must be taken on these cases to comply with the revised policy. Within 30 days of receipt of the list of dually enrolled clients, for each client identified on the list, you must arrange a case conference that involves the respective case managers and, preferably, the client as well.

The purpose of this case conference is to determine which of the two programs is appropriate for the client to continue with, based on the client's needs and readiness. If the client is unable to attend, the case conference should be convened with the respective case managers. The client should then be contacted by a case manager from either program to discuss the recommendation concerning which program is most appropriate to meet their needs. The client must be advised of current policy that prohibits dual enrollment beyond a 60 day period, and must have their options explained so that they can make an informed decision as to which program they wish to continue with. Upon the decision of the client, disenrollment from the other program is to proceed immediately. The AIDS Institute will continue to monitor Medicaid claims data to assure that these cases have been processed as indicated above.

Thank you in advance for your attention to this revised policy guidance.

Sincerely,

Mona Scully
Director, HIV Health Care
AIDS Institute

Ira Feldman
Director, HIV Health Care
AIDS Institute

Enclosure