



MEDICAL HEALTH HOMES

*Promoting Integrated, Person-Centered Care for
People with Intellectual & Developmental Disabilities*

To: North Carolina Department of Health and Human Services Division of Health Benefits

Attention: Dr. Keith McCoy and Deb Goda

From: IDD Medical Health Home Initiative

September 9, 2022

It was with great disappointment that we learned that the Family Navigation In Lieu of Service was not approved as an offered service under Trillium's Tailored Plan. While we understand that there are some elements of Family Navigation that may be provided by an extender under Tailored Care Management, the failure to include Family Navigation as an in lieu of/stand-alone service raises significant concerns as follows:

- Families who choose to exercise their right to opt out of Tailored Care Management will not have access to the essential supports provided by a Family Navigator. These families and Tailored Plan members will benefit from assistance in systems navigation, help to reduce barriers to care, connecting to appropriate resources and supports in a timely manner, and empowering them to make informed decisions. In addition to supporting families, this service can reduce crises and the need for more expensive system responses and services.
- Within the Tailored Care Management model, there is some discretion on the part of the Tailored Plan, CMA, and AMH+ on who is employed on the Care Management Team. It can reasonably be anticipated that not all Care Management providers will employ family members as extenders, therefore further reducing potential access to families supporting families.
- The existing Family Navigation In Lieu of Service goes well beyond the definition of Care Management activities and allows for bridging with families to help navigate to services and plans. These activities will become increasingly critical during the transition to the Tailored Plan model.
- There is no centralized required or endorsed training for Family Navigators outside of this program. We recommend using some sort of structure that can be built upon (NC Family Support ECHO, Trillium's Curriculum, etc.)
- There is no glidepath to ending the service. We suggest allowing additional time for the CMA and potential AMH+s who use family members as extenders to improve choice options for those who want to continue in a similar service model.
- There is precedent for CMS approval of peer mentoring services within IDD:
 - Virginia Dept. of Medical Assistance Services has added peer mentor support service to its DD waiver as of July 2022.
 - Michigan Dept. of Health and Human Services includes peer mentoring services in its Medicaid Provider Manual.
 - Tennessee is working on a pilot program as well



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- There is also precedent in NC for a family support service in the mental health arena. We strongly urge parity for families with IDD experience.

We believe that Tailored Plans should offer access to Family Navigation and Peer Support services beyond the extender role within the Care Management Team. We ask that the exclusion of this service from Trillium's Tailored Plan service array be reconsidered. We further hope that Family Navigation and Peer Support services will be included in the 1915 (i) state plan amendment.

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