



*Healthy People. Healthy Communities.*

Department of Public Health & Human Services

# Federally Qualified Health Center & Rural Health Clinic Updates

Presented by Alyssa Clark

FQHC & RHC Program Officer

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# Agenda

- Reimbursement Methodology
  - Prospective Payment System (PPS Rate)
  - Fee-for-service
- Administrative Rules of Montana Updates - July 1, 2019
  - Change in Scope of Service
  - Alternative Payment Methodology (APM)
- References
- Contact Information
- Questions

# How is the Prospective Payment System Rate Calculated?

## Newly Enrolled (ARM 37.86.4413)

- Issued an interim PPS rate based off of allowable projected costs and visits.
- After the first two fiscal years, the baseline PPS rate is established using the as-filed Medicare cost reports.
- If the cost reports are not received within a timely manner, Medicaid payment is suspended.

## Change in Scope of Service (ARM 37.86.4408)

- A change in scope should be submitted anytime an FQHC or RHC experiences a change in the type, intensity, duration or amount of a service.
- Prospective or Retrospective
- Can increase or decrease the PPS rate.

# Can an FQHC or RHC Get Paid Outside of the PPS Rate?

Fee-for-Service - Services defined as non-FQHC and RHC services, but are approved to be reimbursed to an FQHC or RHC outside of the PPS rate as unbundled services.

- Examples include:
  - ✓ Long-Acting Reversible Contraceptive Devices (LARCs)
  - ✓ Promising Pregnancy Care
  - ✓ Peer Support Services
- Paid at the fee schedule rate posted on the Outpatient Prospective Payment System (OPPS) fee schedule
- Unbundled services cannot not be included in the PPS rate calculation

# Prospective Change in Scope of Service (ARM 37.86.4409)



Submit prospective change in scope of service request to department

If approved, the interim PPS rate will be the later of:

- The date that the change in scope occurred
- Complete application receipt date



Submit supplemental material six months after close of fiscal year in which change of scope occurred

Baseline PPS rate will be established back to date that change in scope occurred



If requested material is not received within a timely manner, Montana Medicaid payment will be suspended

# Retrospective Change in Scope of Service (ARM 37.86.4410)

- In order to be submitted timely, the FQHC or RHC must submit the application within 6 months after the close of the fiscal year in which the change in scope of service took place.
  - ✓ If approved, the effective date of the new baseline PPS rate will be:
    1. Timely applications - The first day of the fiscal year following the change in scope of service.
    2. Untimely applications - Receipt date of all required documentation.
- An FQHC or RHC may apply for a retrospective change in scope of service once per calendar year

# Alternative Payment Methodology (APM)

One-time option to elect through July 1, 2020

- PPS rate cannot decrease

Intended to ensure that PPS rates accurately reflect costs and encounters provided

- Once approved, can be retroactive to July 1, 2019

Attestation forms were sent to the FQHC and RHC CEOs on file

- If elected, please include past two completed as-filed Medicare cost reports in EC (Electronic Copy) format
- Return to [alyssa.clark@mt.gov](mailto:alyssa.clark@mt.gov)

# References

Secretary of State - <http://www.mtrules.org/>

- FQHC & RHC Administrative Rules of Montana (37.86.4401 - 37.86.4420)
- New ARMs and APM process (MAR 37-877) until published under ARMs

The screenshot displays the website for the Montana Secretary of State, Corey Stapleton. The page features a navigation menu with links for HOME, SEARCH, ABOUT US, CONTACT US, and HELP. The main content area is divided into several sections:

- How to ...**: Includes links to learn more about the administrative rule process, find register publication dates, and subscribe to the ARM.
- Related Resources**: Lists links to the Official State Website, Secretary of State, Administrative Rules, ARM Templates, Montana Code Annotated (MCA), and Code of Federal Regulations (CFR).
- Using ARM and MAR**: Provides instructions on how to locate rules that are effective but not yet available online, and a survey link to help improve the website.
- Administrative Rules of Montana** (Updated through September 30, 2019): Offers search options by Full Text Search, Department, Chapter, and Rule Table of Contents, Rule Number, MCA Number, and Title Number.
- Montana Administrative Register**: Provides search options by Full Text Search (from January 2007) and Search By Notice No. (from January 2007), along with a link to browse all Register issues.

At the bottom of the page, there is a footer with navigation links (Home, Search, About Us, Contact Us, Help, Disclaimer, Privacy & Security) and contact information for questions regarding rule content and agency listings.

# Contact Information

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# Questions?

