

Summary of Changes Made to the Policy and Operational Guide for Planning and Implementing the CalAIM Justice-Involved Initiative

October 20, 2023

On October 20, 2023, DHCS released a final “Policy and Operational Guide for Planning and Implementing the CalAIM Justice-Involved Initiative.” DHCS submitted a draft Guide for stakeholder comment on June 12, 2023; DHCS received extensive feedback from numerous implementation partners including, but not limited to, correctional facilities, managed care plans, county behavioral health agencies, county SSDs, state associations, providers, consumer advocates, and community based providers.

The table below provides a high-level summary of the changes that were made to the Policy and Operational Guide based on the comments and feedback received.

Policy and Operational Guide for Planning and Implementing CalAIM Justice Involved Initiative		
Section Number	Section Name	Summary of Changes
ii	Glossary of Terms	<ul style="list-style-type: none"> DHCS created a new section providing definitions of common terms used in this Guide.
iii	Introduction	<ul style="list-style-type: none"> Formatting non-substantive changes.
iv	Context Setting	
1	California’s 1115 Demonstration Waiver and Legal Authority	
2	Justice-Involved PATH Funding for Pre-Release Application and Services	<ul style="list-style-type: none"> This section was revised to further clarify the process by which DHCS will seek approval from CMS for on-going Medicaid administrative matching funds.
3	Approach to Planning and Implementation of Pre-Release Services	<ul style="list-style-type: none"> Formatting non-substantive changes.
4	Enrolling in Medi-Cal Coverage	<ul style="list-style-type: none"> This section was revised to further clarify expectations relations to intercounty transfers prior to release and

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Section Number	Section Name	Summary of Changes
		requirements related to Medi-Cal redeterminations while an individual is incarcerated.
5	Readiness Assessments	<ul style="list-style-type: none"> This section was revised to clarify the expectations related to readiness assessment submission requirements and the review and approval process.
6	Pre-Release Services and Behavioral Health Links Eligibility Screening Process	<ul style="list-style-type: none"> This section includes new scenarios on when the 90-day pre-release period starts, stops and be restarted.
7	Compliance with SSA 1902	<ul style="list-style-type: none"> Formatting non-substantive changes.
8	Providing Pre-Release Services Delivery Model	
	Short-Term Model	<ul style="list-style-type: none"> This section includes changes related to when the delivery of pre-release services must be initiated and provides additional guidance on recommended implementation practices.
	Telehealth Services	<ul style="list-style-type: none"> This section clarifies that embedded providers may deliver and bill Medi-Cal for services delivered via telehealth.
	Care Management Model	<ul style="list-style-type: none"> This section further clarifies the roles and responsibilities of the pre-release care manager and outlines the processes for assignment of pre-release care managers and post-release ECM providers.
	Physical and Behavioral Health Clinical Consultation	<ul style="list-style-type: none"> Formatting non-substantive changes.
	Medication Coverage During Pre-Release Period	<ul style="list-style-type: none"> This section further clarifies the requirements related to: Medi-Cal enrollment for community-based pharmacies; medications covered by Medi-Cal as a part of the Contract Drug List, and billing for medications dispensed from a shared stock.
	Medications for Substance Use Disorder Coverage	<ul style="list-style-type: none"> This section provides new guidance related to the administration of methadone in correctional facilities and provides additional clarification on the requirements related to

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		the provision of Medications for Substance Use Disorder Coverage.
	Medications Upon Release	<ul style="list-style-type: none"> • Formatting non-substantive changes.
	Durable Medical Equipment Upon Release	
9	Provider Enrollment and Payment	<ul style="list-style-type: none"> • This section clarifies expectations related to the use of a correctional health NPI.
10	Pre-Release Service Rate Setting	<ul style="list-style-type: none"> • This section provides clarification on billing and claiming processes for federally qualified health centers (FQHCs) and updates the guidance related to the five care management bundles.
11	ECM Eligibility	<ul style="list-style-type: none"> • Formatting non-substantive changes.
	Pre- and Post-Release Warm Handoff Requirement	
	Managed Care Auto-Assignment and Current Month Enrollment	
	Behavioral Health Links	<ul style="list-style-type: none"> • This section provides further clarification on the roles and responsibilities for correctional facilities and county behavioral health agencies in implementing behavioral health links and modifies the go-live date.
12	Monitoring and Evaluation	<ul style="list-style-type: none"> • This section provides additional detail on DHCS approach for overall monitoring and oversight.
13	MCP Requirements for Implementing Enhanced Care Management for the Justice Involved Population of Focus	<ul style="list-style-type: none"> • This section: revises the minimum requirements for JI ECM providers; updates processes for assignment of pre-release care managers and post-release ECM providers; and includes additional detail on expectations for managed care plan (MCP) coordination with correctional facilities, the MCP JI Liaison, and JI ECM Provider network development and monitoring.