

Michigan MI Health Link (MHL) Capitated Financial Alignment Initiative Demonstration

Summary of Changes to the Three-Way Contract

The three-way contract was amended effective January 1, 2023 with the following changes:

- Extended the demonstration through December 31, 2025 and updated demonstration dates accordingly throughout the contract
- Added requirements for integrated care organizations (ICOs) to submit emergency management plans (**Section 2.1.3**)
- Clarified that ICOs shall not terminate an Enrollee's coverage because of being unable to reach the Enrollee (**Section 2.3.7**)
- Added language related to coordinating agreements with behavioral health PIHPs (**Section 2.4.1.7.1**)
- Added requirements related to Michigan's Medicaid dental benefit (**Section 2.4.1.12**)
- Updated Direct Care Worker wage provisions for 2023 (**Section 2.4.1.14.1**)
- Added requirements for ICO diversity, equity, and inclusion training (**Section 2.5.4.5**)
- Added requirements related to Doula and Community Health Worker services, in accordance with Michigan's Medicaid Policy (**Sections 2.7.2.15 and 2.7.2.16**)
- Updated provisions throughout based on the CY 2024 Medicare Advantage and Part D Final Rule (**Sections 2.8.1.7, 2.8.3.7.4, 2.8.6.1.1, 2.13.1.4, 2.14.2.1**)
- Added language clarifying the ICO shall be responsible for payment for any personal care services (PCS) and home- and community-based waiver services (HCBS), and that recoupment from providers for PCS and HCBS authorized and delivered is prohibited (**Sections 2.8.5.3 and 5.1.9.2**)
- Added language to address demonstration transition (**Section 3.3**)
- Updated the Part D Addendum for consistency with the Medicare Advantage Part D Addendum (**Appendix D**)
- Added to Appendix J – Additional Medicare Waivers to account for Medicare Advantage marketing guidance being codified into regulation and state guidance deviating in certain aspects since the start of the demonstration when the MA guidance was sub-regulatory.
- Added to Appendix J – Additional Medicare Waivers to allow communication with beneficiaries earlier than 90 days until the end of the demonstration, and tailoring the notification for the MMP to use at the end of the demonstration if members are staying with the same plan sponsor.
- Added to Appendix J – Additional Medicare Waivers to allow the movement of MMP members to an affiliated D-SNP, dependent on the demonstration transition.