Milestone 2: Capacity Building Application – Attestations form

Washington State
Health Care Authority

Reentry Demonstration Initiative

This form contains attestations that carceral facilities (CFs) must complete as part of submitting Milestone 2: Capacity Building Application (CBA) for the Reentry Demonstration Initiative. HCA will review CF attestation responses to identify:

- Each facility's baseline capacity and ability to provide reentry services.
- Technical assistance that each facility will need to meet the attestation requirements and cohort go-live date.

For a list of commonly used acronyms and terms used in this form, see the **Intro to the Capacity Building Application**.

Instructions

The following Reentry Initiative attestations are divided across six required sections and one optional section. Review the attestation statement in each section and mark the appropriate checkbox for your facility. There is space at the bottom of each section to provide more detail on the technical assistance your facility may need.

> Please note: Asking for/indicating the need for technical assistance does not impact a CF's ability to participate in the Reentry Initiative or impact the amount of capacity building funds a facility will receive.

1	No cost to individuals

Facilities are not permitted to charge individuals or health care providers for any reentry services or activities associated with those services.

Attestation question

1. **CF provides reentry services and activities* at no cost to the individual or their health care provider(s)**.**

    ☐ CF will meet requirement by cohort go-live date. (The go-live date for Cohort 1 is **July 1, 2025**.)

    ☐ CF needs technical assistance to meet the requirement.

*Activities include screening for Apple Health eligibility; support in applying for Apple Health coverage by submitting an enrollment application; provision and receipt of medical care, prescription drugs, case management, labs and radiology, medical equipment and supplies; and communication in any form (e.g., emails, phone calls, mail, copies of medical records, etc.).

**Health care providers include community-based physical health, behavioral health, and health-related social needs providers such as community health workers and recovery coaches, Accountable Communities of Health (ACHs,) and Managed Care Organizations (MCOs).

If your facility needs technical assistance to meet the above requirement, please describe the support you need:

2	Staffing and governance structure

CFs must establish a staffing and governance structure to support planning and decision-making for the Reentry Initiative.

Attestation questions

1. **CF establishes a staffing structure to support each readiness requirement.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

2. **CF has a defined governance structure for decision-making and coordinating with key partners (e.g., internal and external providers and pharmacies, MCOs, Community Hubs, Native Hub, and HCA contractors).**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

If your facility needs technical assistance to meet the above requirements, please describe the support you need:

3	Apple Health screening, application support, suspension, and release date notification

CFs must be able to screen individuals for Apple Health eligibility and assist individuals with applying for Apple Health coverage by submitting an enrollment application. CFs may work with community-based Apple Health navigators to fulfill these requirements. They must also be able to share incarceration statuses with HCA and communicate information about future release dates with providers.

Attestation questions

1. **CF screens individuals entering their facility for Apple Health eligibility as close to intake as possible. For prisons and Juvenile Rehabilitation Administration facilities (JRA), screening must occur prior to 90 days before release.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

2. **For individuals incarcerated for longer than 90 days, the CF re-checks Apple Health eligibility 90-120 days prior to their release.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

3. **CF receives parental/guardian consent to submit an Apple Health enrollment application for youth under 18 who are eligible for coverage, except for emancipated minors.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

4. **CF obtains Apple Health application signatures for each application.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

5. **CF shares mailed Apple Health information with incarcerated individuals, including documentation from MCOs.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

6. **CF provides Apple Health application support to individuals with Apple Health eligibility questions. This requirement can be achieved by working with community-based Apple Health enrollment navigators.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

7. **CF collects a post-release address and/or contact information for reentering individuals.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

8. **CF provides support, space, and staffing for incarcerated individuals to request and participate in HCA and MCO fair hearings, as needed.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

9. **CF provides contact information for Apple Health support to individuals upon their release.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

10. **CF notifies HCA to suspend/unsuspend Apple Health coverage for each entering/releasing individual within 24 hours of them entering/exiting a facility.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

11. **CF uses an HCA suspension reporting tool (e.g. JBRS, OMNI).**
    Note: Juvenile detention facilities and Tribal jails do not need to meet this requirement. HCA will work on separate plans with these facilities.

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

12. **CF shares information about future release dates with HCA via the suspension reporting tool.**
    Note: Juvenile detention facilities and Tribal jails do not need to meet this requirement. HCA will work on separate plans with these facilities.

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

13. **CF notifies HCA via their reporting tool when they expect an individual to be incarcerated for longer than 90 days.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

14. **CF shares release date estimates with pre-release case manager.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

15. **CF shares release date estimates with post-release case manager.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

If your facility needs technical assistance to meet the above requirements, please describe the support you need:

4	Provider enrollment and billing

Attestation questions

1. **CF's reentry services providers, including pharmacies and in-facility staff, are enrolled in Apple Health.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

2. **CF's reentry services providers, including pharmacies and in-facility staff, are credentialed with every Medicaid MCO.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

3. **CF's reentry services providers, including pharmacies and in-facility staff, contract with each MCO.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

4. **The pharmacy used by the CF can bill HCA and MCOs at the individual level (e.g., individual billing rather than bulk or facility-wide).**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

5. **CF providers can bill HCA and MCOs for reentry services.**
Note: HCA is offering a **free** claims clearinghouse to support provider billing. CFs that need this support should attest they need technical assistance to meet the requirement and indicate their interest in participating in the claims clearinghouse below.

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

If your facility needs technical assistance to meet the above requirements, please describe the support you need. If your facility would like to participate in the free claims clearinghouse, please indicate your interest in this section.

5	Case management

Case management (CM) is one of three mandatory reentry services that CFs must provide to participate in the Reentry Initiative. CFs can work with facility-based providers, community-based providers, MCOs, or the third-party administrator to provide this service. CM will include the activities listed below. A comprehensive list of CM requirements will be released as part of a billing guide in Fall 2024:

- Screening for:
    - Physical health
    - Mental health
    - SUD
    - Functional support, such as wheelchairs, ADA accommodation, etc.
    - Unmet social needs that could make it difficult for an individual to address their health care needs when reentering the community, such as housing, employment, transportation, driver's license and other identification, education, and food.

Health screening determines the types of services or supports an individual may need.

- Conducting an in-depth assessment of health needs. The in-depth assessment is a comprehensive process that includes monitoring and delivering the care needed for overall health and wellbeing.
- Developing a care plan to address health care needs. A care plan may include care received while incarcerated and after release.

  ◦ Providing necessary health care while the individual is incarcerated and monitoring their condition.
  ◦ Making appropriate referrals to community resources to accomplish the care plan. Some of those referrals may require action while an individual is incarcerated (e.g., referral to an addiction specialist to initiate MOUD treatment for a pregnant patient), while some referrals may be for services provided upon release (e.g., referral to a methadone clinic to continue MOUD treatment upon release).
  ◦ When the referral is to a community provider for services provided after release, ensure there is coordination*. For a referral to a community provider, coordination would likely include ensuring the patient has a firm appointment and transportation, appropriate medical records have been sent to the clinic, and engagement with the provider occurs.

The above CM elements must be voluntary and not a prerequisite to accessing other reentry services or Apple Health benefits. While individual elements of CM may be performed by unlicensed staff, these services must be:

- Within the unlicensed staff's educational and training abilities.
- Delegated by and overseen by licensed clinical staff (e.g., RN, social worker), under whose name the services will be billed.

*Coordination can mean different things, depending on the referral. For example, if the referral is to a community-based hub (CBO) that will find housing for the individual on the day they are released, coordination would likely include direct communication between the CBO, CF staff, and the individual in the days, weeks, and possibly months prior to release. This coordination may also include having a CBO staff member meet the individual immediately upon their release. This prior communication and/or "meet at the door" is often referred to as a "warm hand-off."

Additional information on targeted reentry services will be available on **HCA's Provider Billing Guide website** in the fall.

Attestation questions

1. **CF provides a warm handoff to the case management team after an individual has been determined eligible for Apple Health.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

2. **CF establishes a staffing model that meets the initiative's case management requirements (e.g., in-facility case manager(s) or correctional officer staff to support access to external case manager(s)).**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

3. **CF creates process and health care staff capacity to serve eligible Apple Health individuals.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

4. **CF ensures adequate infrastructure to support delivery of case management services, including ensuring appropriate space, technology, and privacy for initial and follow-up appointments, whether in-person or virtual (telehealth).**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

5. **CF works with the MCO to share relevant information to the case manager, including information on existing medications and care plan data. The CF must share relevant health information from the incarceration period to the MCO at no cost to the MCO.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

6. **CF screens individuals for SUD.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

7. **CF provides a warm handoff for individuals with positive SUD screen and/or interested individuals to an SUD consultation and/or prescribing providers, as needed.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

8. **CF develops care plans with the case manager and individual, and with input from other providers as appropriate.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

9. **CF provides a warm handoff for individuals to a post-release case manager prior to release, when the post-release case manager is different from the pre-release case manager (in some instances, they may be the same person). Post-release case managers can be staffed within a facility, or be a community-based provider, MCO case manager, or another provider identified with assistance from HCA.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

10. **CF develops relationships with ACHs, Community Hubs, and/or Native Hub or other health-related social needs organizations in the community. These relationships will help the CF connect individuals to health-related social needs screenings and referrals after their release.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

11. **CF documents/tracks individual refusals to participate in case management; case managers re-offer case management at an appropriate frequency and as requested.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

12. **CF provides hearing and/or language interpretation services to individuals accessing medical services, as needed and when requested by the individual.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

If your facility needs technical assistance to meet the above requirements, please describe the support you need:

6	Support for medications

Facilities are required to support medications for SUD as well as to provide a 30-day supply of medication at the time of release. Additional information on targeted reentry services will be available on **HCA's Provider Billing Guide website** in the fall.

Attestation questions

1. **CF has on-site pharmacy and/or a relationship with an off-site pharmacy (or pharmacies) to dispense medications.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

2. **CF has appropriate and safe storage locations for medication.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

3. **CF ensures safe and secure storage of SUD medications that align with requirements for controlled substances.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

4. **The pharmacy the CF uses can dispense medication in individual-specific packaging or document dispensed medication from shared stock bottles at the individual level.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

5. **CF collects information from individuals, MCOs, or providers on an individual's existing medications at intake.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

6. **CF provides medication treatment options for SUD, including MOUD and MAUD, and makes available at least one opioid agonist—preferably buprenorphine—and at least two FDA-approved medications for AUD.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

7. **CF's qualified treatment provider will determine and initiate treatment for individuals who screen positive for SUD or later report SUD-associated cravings, symptoms of withdrawal, or who self-report a need.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

8. **CF provides SUD medications as soon as possible (and in alignment with clinical indications), especially in the presence of withdrawal symptoms.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

9. **CF provides timely (same or next day) SUD treatment medications for existing SUD medication therapy, including any agonist medication, such as full-agonists like methadone and partial-agonists like buprenorphine.**

   CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

10. **CF provides continuity of care for existing SUD medication therapy for 90 days until individual can transition to preferred Apple Health-covered drug (following CF verification or receipt of clinically appropriate documentation or prior authorization from SUD provider).**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

11. **CF ensures assessment and provision of medication continuation and withdrawal management are available daily to prevent gaps in care that can unnecessarily precipitate or sustain withdrawal.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

12. **CF provides all medically necessary medication, dosages, treatment duration in accordance with treatment plan .**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

13. **CF addresses medication diversion through ongoing monitoring (e.g., drug screening) and risk mitigation.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

14. **CF provides specialized treatment services to pregnant and post-partum individuals to reduce health risks.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

15. **CF trains staff and incarcerated individuals on how to use MAUD/MOUD medications and naloxone.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

16. **CF ensures an adequate supply of FDA-approved opioid overdose reversal medications are available on- site for incarcerated individuals.**

    CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

17. **CF provides an appropriate supply of take-home SUD medication upon an individual's release, which may include a greater than 30-day supply of medications, when appropriate to meet an individual's need from the time of their release to transitioning to a community provider.**

CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

18. **CF provides a refill prescription upon an individual's release, as clinically appropriate.**

CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

19. **CF complies with Apple Health's prior authorization and utilization management (PA/UM) requirements.**

CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

20. **CF provides naloxone to individuals with history of OUD upon their release, as clinically indicated.**

CF will meet requirement by cohort go-live date.   CF needs technical assistance to meet requirement.

If your facility needs technical assistance to meet the above requirements, please describe the support you need:

7	Additional services - Optional

This section is optional for facilities to complete.

Facilities can also support the following optional reentry services at go-live or a later date. Additional information on reentry services will be available on **HCA's Provider Billing Guide website** in the fall.

Attestation questions

1. **CF offers physical and behavioral health clinical consultations.**

CF will provide this service *by* the cohort go-live date.   CF will provide this service *after* the cohort go-live date.

CF would like to provide this service but needs technical assistance.

2. **CF provides pre-release medications—medications provided within a facility in addition to required medications for SUD—and a 30-day supply of medications at the time of a person's release.**

CF will provide this service *by* the cohort go-live date.   CF will provide this service *after* the cohort go-live date.

CF would like to provide this service but needs technical assistance.

3. **CF provides lab and radiology services.**

CF will provide this service *by* the cohort go-live date.   CF will provide this service *after* the cohort go-live date.

CF would like to provide this service but needs technical assistance.

4. **CF provides medical equipment and supplies at the time of a person's release.**

CF will provide this service *by* the cohort go-live date.   CF will provide this service *after* the cohort go-live date.

CF would like to provide this service but needs technical assistance.

5. **CF offers community health workers (e.g. peer recovery counselors) for connections to health-related social needs services.**

   CF will provide this service *by* the cohort go-live date.   CF will provide this service *after* the cohort go-live date.

   CF would like to provide this service but needs technical assistance.

6. **CF can schedule visits and provide care coordination to ensure incarcerated individuals' access to additional services.**

   CF will provide this service *by* the cohort go-live date.   CF will provide this service *after* the cohort go-live date.

   CF would like to provide this service but needs technical assistance.

7. **CF has a non-clinical staffing model that supports incarcerated individuals' access to clinical visits.**

   CF will provide this service *by* the cohort go-live date.   CF will provide this service *after* the cohort go-live date.

   CF would like to provide this service but needs technical assistance.

8. **CF establishes physical space and provides logistical support to facilitate incarcerated individuals' access to clinical visits.**

   CF will provide this service *by* the cohort go-live date.   CF will provide this service *after* the cohort go-live date.

   CF would like to provide this service but needs technical assistance.

9. **CF complies with Apple Health requirements to provide medical equipment and supplies and ensure the completion and submission of any necessary prior authorization requests.**

   CF will provide this service *by* the cohort go-live date.   CF will provide this service *after* the cohort go-live date.

   CF would like to provide this service but needs technical assistance.

If your facility needs technical assistance to provide these additional services, please describe the support you need:

| **8** | **Signature** |

Printed first and last name   Signature

Date

> **How to submit this form**
>
> To complete Milestone 2 of the Reentry Demonstration Initiative, CFs must submit this Attestations form, along with other submission materials, to the Washington State Health Care Authority (HCA). See our **Intro to the Capacity Building Application** for details.