

Overview: We hope participants are pleased with Ascension Living PACE Michigan’s care after enrollment. However, PACE is a month-to-month program. This means, any participant may leave the program at any time. If a participant chooses to move outside of our service area or decides to leave the program for any reason, they should talk about this with their Social Worker. The following information describes the process for **Voluntary Disenrollment** (participant choice) or **Involuntary Disenrollment** (Ascension Living PACE Michigan gives notice to a participant due to reasons noted in this document).

Purpose: To describe voluntary and involuntary disenrollment procedures and ensure that Ascension Living PACE Michigan will follow Federal regulations and State of Michigan policies regarding voluntary and involuntary disenrollment of participants.

Scope: This process applies to all employees, volunteers, business associates, and contracted providers who provide care or a service to a participant.

Definitions:

CMS: Centers for Medicare and Medicaid Services

MDCH: Michigan Department of Community Health

QAPIP: Quality Assessment and Performance Improvement Program

Compliance and Enforcement: All management personnel are responsible for enforcing this process. All individuals must comply with this process.

Process: At Ascension Living PACE Michigan participant’s enrollment continues until death regardless of changes in health status unless voluntary or involuntary disenrollment from Ascension Living PACE Michigan occurs.

Procedures: Benefits from Ascension Living PACE Michigan can be terminated for the following reasons:

1. A participant “voluntarily” disenrolls from the program.
2. A participant no longer meets the conditions of enrollment as stated in Federal and State regulations.
3. A participant passes.

Voluntary Disenrollment.

1. Ascension Living PACE Michigan participants may voluntarily disenroll from the program without cause at any time.
2. Participants expressing interest in disenrolling from Ascension Living PACE Michigan are contacted by their Social Worker.
3. The Social Worker discusses the reason the participant is interested in disenrollment and the process for disenrollment. This process is documented in the medical record.
4. If there is a concern that can be remedied, the Social Worker works toward a resolution.
5. If a participant wishes to voluntarily disenroll from Ascension Living PACE Michigan, he/she will need to sign a Disenrollment Form that verifies the voluntary cancellation of enrollment. The form will specify the date the disenrollment is effective.
6. Discussion of the disenrollment is presented by the Social Worker at the Care Team conference.
7. The Care Team identifies referrals for the participant to connect them to needed services following disenrollment.
8. The participant receives notification of referrals in writing.
9. The Social Worker notifies the participant that they must receive services from Ascension Living PACE Michigan until disenrollment is effective.
10. The Social Worker assists the participant in completing the disenrollment paperwork.
11. The completed disenrollment form is processed through the State of Michigan CHAMPS system.
12. The participant's name is added to the Deletions form and faxed to CMS Medicare's Office of Financial Management, Demonstrations Management Branch, on the 10th of every month.
13. Coverage information is ended on Ascension Living PACE Michigan computer database and verified by the Site Director.
14. Quality Assessment Manager is notified of the disenrollment and audits the disenrollment process. The audit includes confirmation of faxed documentation and a system check to assure the database information is changed.
15. Voluntary disenrollments will be used in the Quality Assessment and Performance Improvement Program (QAPIP). The QAPIP will track the reason for the voluntary disenrollment, length of time enrolled in Ascension Living PACE Michigan, etc.

Involuntary Disenrollment.

Involuntary disenrollments require prior approval by the State of Michigan. Involuntary disenrollment is used as a last resort after all reasonable remedies have been exhausted.

1. Involuntary disenrollment reasons include:

- A participant moves out of the service area or is out of the service area for more than thirty (30) consecutive days, unless Ascension Living PACE Michigan agrees to a longer absence due to extenuating circumstances.
 - A participant or caregiver engages in disruptive or threatening behavior, defined as behavior of a participant that jeopardizes his or her health or safety, or the safety of others.
 - The consistent refusal of a participant or caregiver with decision-making capacity to comply with his or her individual plan of care or the terms of Ascension Living PACE Michigan Enrollment Agreement.
 - The participant is determined to no longer meet the State of Michigan Nursing Facility Level of Care Determination Tool requirements and is not “deemed eligible” according to State of Michigan criteria.
 - The participant fails to pay or make satisfactory arrangements to pay any premium and/or patient liability (including non-payment of share of cost for a participant residing in a nursing facility) due to Ascension Living PACE Michigan after a thirty (30) day grace period.
 - The agreement with CMS and the State of Michigan administering agency is not renewed or is terminated.
 - Ascension Living PACE Michigan is unable to offer health care services due to loss of State licenses or contracts with outside providers.
2. Ascension Living PACE Michigan may not disenroll a PACE participant on the grounds that the participant has engaged in noncompliant behavior if the behavior is related to a mental or physical condition of the participant, unless the participant’s behavior jeopardizes his or her health or safety, or the safety of others.
3. When a participant fits the criteria for involuntary disenrollment, as determined by the Care Team process, the Care Team will discuss potential resolutions to the problem.
4. If the participant fits the Ascension Living PACE Michigan involuntary disenrollment criteria, the participant or their designated representative is contacted by the Social Worker to discuss the issue(s) and outline the steps for resolution.
5. If efforts to resolve areas of conflict or jeopardy result in an impasse, the case will be

brought back to the Care Team by the Social Worker. Appropriate referrals for the participant to connect them to needed services following disenrollment will be discussed and a decision to involuntarily disenroll the participant will be made by the entire Care Team.

6. The Site Director informs the Project Officer at the State of Michigan (517-373-6313) of the involuntarily disenrollment decision and provides any needed documentation or information.

Ascension Living PACE Michigan must send the State of Michigan the following documentation for review of any involuntary disenrollment request:

- Copy of the participant's original assessment performed by the Care Team.
- Copy of the participants' most recent assessment performed by the Care Team.
- Copy of the most recent completed State of Michigan Nursing Facility Level of Care Determination Tool.
- Current diagnosis list for the participant.
- Current discharge plan for the participant including referrals for the participant to connect them to needed services if disenrolled from the Ascension Living PACE Michigan.
- Documentation from the medical record the participant has been involved in possible disenrollment discussions and has had all concerns addressed.
- A letter from the primary care physician documenting the need for the disenrollment and the relevant facts regarding the disenrollment decision.
- Any other additional information Ascension Living PACE Michigan feels pertinent to the review.

If the disenrollment request is due to disruptive, threatening, or willful noncompliant behavior, Ascension Living PACE Michigan must submit the following for review:

- Documentation of the problem behavior.
- Copy of the medical record that indicates the IDT team has discussed potential resolutions to the problem.
- Copy of the medical record that indicates reasonable remedies have been attempted and the reasons for their failure.

7. The State of Michigan Project Officer will send written notification to the Site Director, including an electronic copy of the completed PACE Disenrollment Review Form.

8. If the Site Director and State of Michigan Project Officer agree to the involuntary disenrollment, the Site Director will send the participant a 30-day written notice of the involuntary disenrollment decision. The written notice explains the reasons for the involuntary disenrollment, the referrals that have been made to community resources and information about the appeal process.
9. Ascension Living PACE Michigan will work with CMS and the State of Michigan to reinstate the participant in other Medicare and Medicaid programs for which the participant is eligible.
10. The Social Worker explains the disenrollment process to the participant or their designated representative and explains that services must be received from Ascension Living PACE Michigan until the disenrollment becomes effective.
11. The effective date of disenrollment will be determined using the most expedient process allowed under Medicare and Medicaid procedure. The date will be coordinated between Medicare and Medicaid and reasonable advance notice will be given to the participant.
12. The completed disenrollment form is faxed to the State of Michigan with the effective date of disenrollment specified. Disenrollment forms are faxed as disenrollments occur.
13. A participant's information is added to the Deletion's form and faxed to CMS Medicare Office of Financial Management, Demonstrations Management Branch by the 10th day of the month following disenrollment. The effective disenrollment date is the same as that reported to the State of Michigan.
14. Coverage information is ended on the Ascension Living PACE Michigan computer database and verified by the Site Director.
15. The QA Coordinator is notified of disenrollment and tracks data regarding the reason for disenrollment.

Disenrollment and Expenses.

1. Participants must continue to use Ascension Living PACE Michigan services and pay any applicable monthly charge until the disenrollment is effective.

Reinstatement in Ascension Living PACE Michigan.

1. If the participant chooses to leave Ascension Living PACE Michigan voluntarily, he/she may re-apply for services, but must continue to meet the eligibility requirements.
2. If the participant leaves involuntarily because of unpaid charges, he/she may not re-enroll unless all past charges are current. The participant must make any payments due before the end of the last month he/she is to get services from Ascension Living PACE Michigan.
3. Re-enrollment for other involuntary reasons is considered on a case-by-case basis. Re-enrollment is subject to the resolution of the reason for involuntary disenrollment.