

Community Health Workers

PUBLIC COMMENT SUMMARY

ND Medicaid posts updates to ND Medicaid provider and coverage policies for a period of two (2) weeks to allow providers and the public to comment on the policy updates. This is a summary of the comments and responses for the new Community Health Worker coverage policy. Similar statements have been combined to avoid duplication of responses.

Thank you for participating in the public comment process.

FEEDBACK AND RESPONSES

1. Recommendation to allow physicians, pharmacists and dentists to be added as referring providers.

Response: All physicians, including dentists and pharmacists, are able to refer for services under their scope of practice.

2. Recommendation to allow LMSWs and LBSWs supervise and refer for services.

Response: ND Medicaid is considering adding LMSWs as an ordering/referring provider in the near future. LBSWs are not able to supervise or refer for services in ND Medicaid.

3. Recommendation to add audio-only telehealth services to covered services.

Response: Thank you for your feedback.

4. Recommendation to allow CHWs to bill for visits while a member is at an inpatient facility.

Response: Inpatient facilities are typically paid an all-inclusive rate for services provided during an individual's stay, therefore CHW services are not able to be reimbursed separately.

5. Recommendation that the language of 1915(i) non-covered services be updated to include a pathway for an agency to submit a waiver form for individuals who are eligible for 1915(i) but not enrolled.

Response: If a member is eligible for 1915(i) but not enrolled with 1915(i), they may not receive any 1915(i) services. They may receive CHW services they qualify for via a referral.

6. Recommendation to cover transporting a member to medical appointments and delivery of food, medication, medical equipment, or medical supplies.

Response: Non-emergency medical transportation (NEMT) is a separately covered service in ND Medicaid. Providers who meet the enrollment requirements for NEMT may enroll to provide NEMT services. Please see the [NEMT policy](#) for more information.

The delivery of medical equipment or supplies is a covered service for some durable medical equipment (DME) and supplies. The [DME Manual](#) has more information on delivery. A CHW may assist in arranging the delivery of food and medications but may not bill for delivery of these items.

7. Recommendation for CHWs to be able to bill for assistance in completing applications for insurance enrollment, financial assistance, or other public services based on identified social determinants of health.

Response: Assistance with completing Medicaid applications or other service applications is not a Medicaid-covered service.

8. Request to add certified public health RNs to approved supervisors and referrers.

Response: RNs are not able to supervise or refer for services in ND Medicaid.

9. Include individuals known by a variety of job titles, including promotors, community health representatives, navigators, and other non-licensed public health workers, including violence prevention professionals.

Response: If an organization would like to bill Medicaid for CHW services, they must employ a provider who can become certified through Public Health via one of three tracts as defined in ND Admin Code 33-03-38-04 and listed below:

- Successful completion of a CHW training program;
- Completion of the Community Health Representative training by IHS;
or
- If the applicant has 1,000 or more supervised hours in the previous three years performing tasks within the scope of practice for CHWs as listed in the CHW policy.