



CENTER *for* HEALTH LAW
and POLICY INNOVATION
HARVARD LAW SCHOOL

FOOD IS MEDICINE (FIM) MEDICAID PAYMENT PATHWAYS

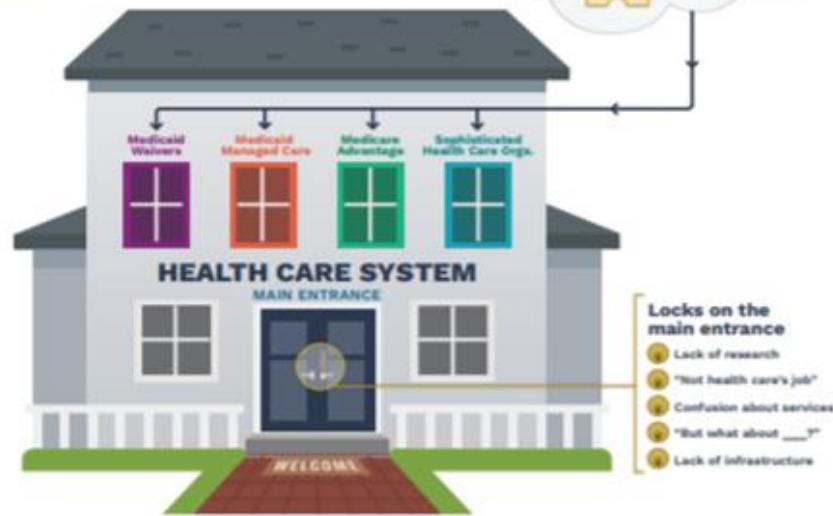
CT HOUSE FOOD IS MEDICINE WORKING GROUP
OCT. 3, 2022

ERIKA HANSON, JD
CENTER FOR HEALTH LAW AND POLICY INNOVATION, HARVARD LAW SCHOOL

OVERVIEW: FIM IN THE HEALTH CARE SYSTEM

Rethinking Health System Design

Although health is mostly influenced by factors outside of the provider-patient interaction, the traditional U.S. health care system has not included (or included only on a very limited basis) interventions and services related to food, housing, transportation, etc. Fragmented integration of these interventions is leading to inequitable access across our system by geography, insurance status, health care provider, and more.



Medicaid Waivers

- 1115 waiver
- 1915(c)
- 1915(i)
- Relies on state action

Flexibilities in Medicaid Managed Care

- In lieu of services
- Value-added services
- Quality improvement activities
- At the plan's discretion

Medicare Advantage

- General supplemental benefits
- Value-Based Insurance Design (VBID)
- Special Supplemental Benefits for the Chronically ill (SSBC)
- At the plan's discretion

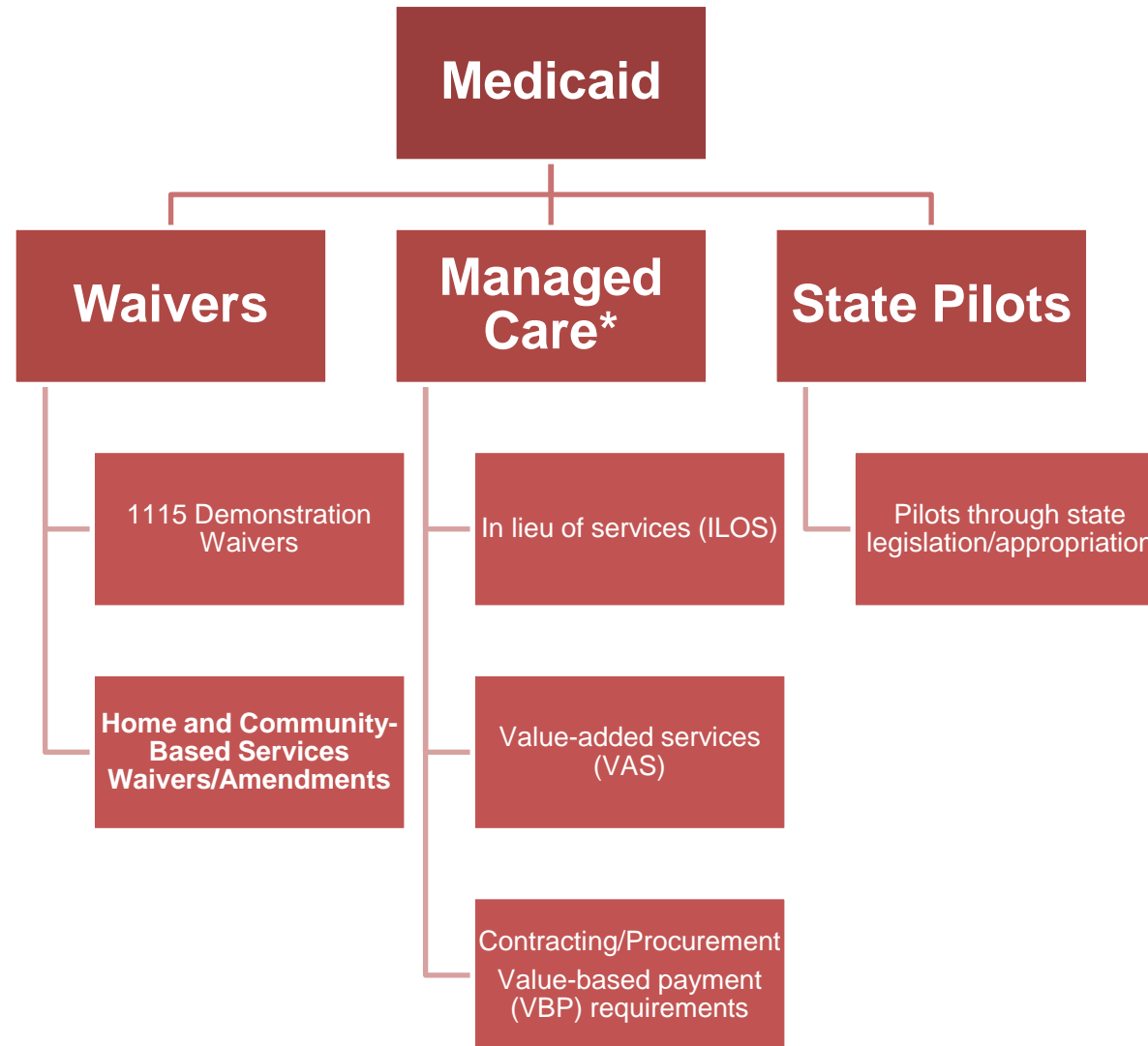
Sophisticated Health Care Orgs.

- Community-clinical partnerships
- Anchor institution investment
- Co-location of services (food pharmacies, medical-legal partnerships, etc.)

Overarching Trend

- **FIM services are NOT “going in the front door” of our health care system.**
 - Barriers continue to prevent inclusion in baseline services in health insurance programs
- **BUT FIM services ARE “getting in through the windows”**
 - Waivers, flexibilities within individual programs, etc.

MEDICAID PAYMENT PATHWAYS FOR PRX



*limited in CT

DEEPER DIVE – MEDICAID PAYMENT PATHWAYS

Pathway	Action Required to Implement
Medicaid HCBS	<ul style="list-style-type: none">• State Medicaid Agency <u>submits</u> HCBS Waiver or State Plan Amendment proposal to CMS. Waiver or SPA includes FIM as covered service(s).
Medicaid 1115 Waiver	<ul style="list-style-type: none">• State Medicaid Agency <u>submits</u> 1115 Waiver proposal (or waiver amendment or renewal) to CMS. Waiver proposal includes payment for FIM service(s)
Managed Care: Value-Based Payment (VBP) Requirements	<ul style="list-style-type: none">• State Medicaid Agency <u>requires</u> managed care plans/providers (via contract) to use value-based payment models. State can require VBP models to address SDOH (e.g., food insecurity) and/or include CBOs• Managed Care Plan/Provers <u>implements</u> VBP models
State Pilots	<ul style="list-style-type: none">• State legislature <u>passes</u> legislation and/or appropriation to establish a pilot program to provide FIM service(s) to Medicaid enrollees

Medicaid Enrollees chooses to use the FIM services.



CENTER *for* HEALTH LAW
and POLICY INNOVATION
HARVARD LAW SCHOOL

1607 Massachusetts Avenue • Cambridge, MA 02138

Connect with us online

chlpi@law.harvard.edu • www.chlpi.org • Facebook & twitter @HarvardCHLPI

