

# Contracting Considerations

## Presenter Reference Handout

### Contracting Checklist

Use this checklist when entering or renewing contracts with health plan partners.

#### Before You Sign

- **Industry-Specific Compliance:** Confirm reporting, performance standards, and audit requirements specific to healthcare contracts
- **Rate Structure:** Ensure rates reflect true cost — consider two-tier pricing for rural routes
- **Inflation Indexing:** Build annual adjustment language into every contract from day one
- **Renewal Cycles:** Control your renewal timeline — don't let it default to health plan terms
- **Volume Thresholds:** Understand minimum and maximum volume commitments before signing
- **Licensing Requirements:** Confirm all intervention licensing requirements are met prior to execution

#### Operational Readiness

- **Referral Methods:** Build referral pipelines you control — don't rely solely on health plan routing
- **Capacity Planning:** Assess whether your systems and work processes can scale to meet contract demands
- **Billing Infrastructure:** Ensure billing team is positioned to handle volume and variable reimbursement
- **Automation:** Identify batch and automation opportunities before volume ramps up

#### Ongoing Management

- **CMS Code Monitoring:** Review new billing codes quarterly — new CCH opportunities emerge regularly
- **ACCH Network:** Leverage ACCH peer discussions to stay ahead of contracting changes
- **Performance Data:** Track and report outcomes health plans care about: readmissions, SDOH screenings, engagement

### Grant vs. Contract Mindset

CBOs moving into health plan contracting must shift how they think about revenue, capacity, and accountability.

| Grant Mindset                     | Contract Mindset                                        |
|-----------------------------------|---------------------------------------------------------|
| <i>Fixed annual funding</i>       | <b>Variable revenue based on volume delivered</b>       |
| <i>Spend-down accountability</i>  | <b>Performance &amp; outcome accountability</b>         |
| <i>Capacity = what we have</i>    | <b>Capacity = what we must build to scale</b>           |
| <i>Single funder relationship</i> | <b>Multi-payer contract management</b>                  |
| <i>Reporting = compliance</i>     | <b>Reporting = performance &amp; payment trigger</b>    |
| <i>Rate is set externally</i>     | <b>Rate is negotiated — and must cover true cost</b>    |
| <i>Renewals are predictable</i>   | <b>Renewals must be managed and timed strategically</b> |

**Key Bridge:** Capacity Funds are a critical tool to help CBOs build the infrastructure needed to operate at contract scale before full revenue flows in.

## CMS Billing Codes Relevant to CCH Work

Rates reflect 2026 national averages from the CMS Physician Fee Schedule. Verify local rates via the Medicare Physician Fee Schedule Look-Up Tool. Rates vary by region and payer.

| Code         | Description                                                                                                                        | 2026 Avg. Reimb. |
|--------------|------------------------------------------------------------------------------------------------------------------------------------|------------------|
| <b>G0019</b> | Community Health Integration (CHI) — monthly non-face-to-face care coordination addressing upstream health drivers                 | Varies by plan   |
| <b>G0022</b> | CHI add-on — additional time beyond base monthly service                                                                           | Varies by plan   |
| <b>G0136</b> | Physical activity & nutrition assessment (5–15 min, every 6 months) — formerly SDoH risk assessment, redefined 1/1/2026            | ~\$20            |
| <b>99490</b> | Chronic Care Management (CCM) — non-complex, first 20 min/month                                                                    | ~\$62            |
| <b>99439</b> | CCM add-on — each additional 20 min/month                                                                                          | ~\$47            |
| <b>99487</b> | Complex CCM — first 60 min/month                                                                                                   | ~\$133           |
| <b>99489</b> | Complex CCM add-on — each additional 30 min                                                                                        | ~\$70            |
| <b>G0556</b> | Advanced Primary Care Management (APCM) — 0–1 chronic conditions                                                                   | ~\$15            |
| <b>G0557</b> | APCM — 2+ chronic conditions                                                                                                       | ~\$50            |
| <b>G0558</b> | APCM — high complexity / severe chronic conditions                                                                                 | ~\$110           |
| <b>99495</b> | Transitional Care Management (TCM) — moderate complexity; contact within 2 business days, face-to-face within 14 days of discharge | ~\$220           |
| <b>99496</b> | TCM — high complexity; contact within 2 business days, face-to-face within 7 days of discharge                                     | ~\$298           |

### Important Notes:

- TCM and CCM cannot be billed concurrently within the same 30-day post-discharge period
- G0511 (bundled RHC/FQHC care management) was sunset September 30, 2025 — bill individual CPT codes going forward
- G0136 descriptor changed 1/1/2026: now covers physical activity & nutrition assessment, not broad SDoH screening
- APCM codes (G0556–G0558) are complexity-based, not time-based — a significant shift from CCM billing logic
- Z-codes (Z55–Z65) document social risk factors and support health equity reporting and risk adjustment

## ACL-Approved Evidence-Based Programs in Use

The following ACL-approved Evidence-Based Health Promotion (EBHP) programs are currently deployed or planned across CCS and WNYICC's Community Care Hub programs. All programs are on the current ACL Title III-D approved list.

| Program                                           | Focus Area                                                              | Delivery Format                                                           | Source / Developer                                |
|---------------------------------------------------|-------------------------------------------------------------------------|---------------------------------------------------------------------------|---------------------------------------------------|
| <b>Active Choices</b>                             | Physical activity, chronic disease management, falls prevention         | Individual; telephone or video — one-on-one with trained advisor          | Stanford Patient Education Research Center        |
| <b>CDSME Toolkit (Phone Adaptation)</b>           | Chronic disease self-management; medication adherence; HbA1c management | Individual telephone — 4 of 6 structured calls counts as ACL completer    | Stanford Chronic Disease Self-Management Program  |
| <b>PEARLS</b>                                     | Depression & behavioral health for older adults with chronic conditions | Individual; in-home or telephone — delivered by trained care coordinators | University of Washington                          |
| <b>HomeMeds</b>                                   | Medication management; identifies medication-related problems           | Individual; in-home or telephone — structured medication review           | Health Sciences Research Associates               |
| <b>Stepping On</b>                                | Fall prevention; self-efficacy, balance, strength, home hazards         | Group workshop series (7 sessions); community or clinic setting           | University of Wisconsin-Madison                   |
| <b>Otago Exercise Programme</b>                   | Fall prevention through strength and balance exercises                  | Individual; home-based exercise program with instructor follow-up         | University of Otago (New Zealand) / CDC STEADI    |
| <b>Healthy IDEAS</b>                              | Depression identification and management in older adults                | Individual; integrated into home and community-based services             | Baylor College of Medicine                        |
| <b>Care Transitions Intervention (CTI™)</b>       | Hospital readmission prevention; 30-day post-discharge transitions      | Individual; in-home visit + 3 phone calls within 30 days of discharge     | Eric Coleman, MD / Care Transitions Program       |
| <b>National Diabetes Prevention Program (DPP)</b> | Type 2 diabetes prevention; lifestyle behavior change                   | Group (in-person or online); 16 core sessions + 6 monthly follow-up       | CDC-recognized; billed under Medicare DPP benefit |

**Note:** Program selection should align with HEDIS and Star Rating gap priorities identified by your health care partner. All programs above are on the current ACL Title III-D approved EBHP list. Individual/telephone-delivered formats maximize reach for rural, homebound, and high-acuity populations.

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