

## **No Appropriate Placement Available (NAPA)**

### **A. Definition**

NAPA stands for No Appropriate Placement Available. This means that there is not an appropriate housing option available in the community to meet the participant's needs after discharge planning and actively seeking housing options.

When a CFC Nursing Facility participant's continued stay has been denied because the participant is no longer clinically eligible or the attending physician has written a discharge order and there is no appropriate placement available, the Nursing Facility may request that the participant be placed in a NAPA status.

NAPA status allows for Medicaid to pay for care in the Nursing Facility up to 60 days. The Department may extend NAPA status when the Nursing Facility has demonstrated active discharge planning and when there is no reasonable discharge option available.

NAPA will only be considered upon request for participants who are active on Choices for Care (CFC)-Long Term Care Medicaid, and are in a Nursing Facility.

### **B. Procedure**

If a participant is active on CFC and receiving care in a Nursing Facility and at any point in time DAIL finds that the participant is no longer clinically eligible for nursing home level of care, DAIL will issue a denial notice with appeal rights to the CFC participant and copy to the Nursing Facility, DCF, and legal representative when appropriate. If the participant disagrees with the termination decision, the participant may follow instructions on the notice in order to appeal. ***Please see Section V.8.: Notices, Variances & Appeals Procedures of CFC Program Manual for more info regarding the appeals process.***

Upon receipt of the notice, the Nursing Facility may only bill Medicaid until the termination date listed on the notice (30 days from the date of the notice). DCF-Economic Services, upon receipt of the notice will put an end date on the Long Panel that matches the termination date in the notice and send the appropriate parties a closure notice.

The Nursing Facility, together with the participant and/or legal representative, has the opportunity to request NAPA status and continued payment while diligently discharge planning up to 60 days if it is identified that there is no appropriate and reasonable housing option for the participant at that time. The request shall be in writing and be submitted to the local DAIL LTCCC nurse to include the date the discharge planning

started and description of all discharge plans to date. The request shall include the participant's preference and choice, as well as detailed info of who the Nursing Facility staff have contacted.

Upon receipt of the NAPA request, DAIL will review the request and determine whether or not to grant the request. If the request is granted, DAIL will generate a new notice continuing CFC eligibility due to NAPA status and will send a copy to DCF-Economic Services to re-activate the participant's Long Panel. This will authorize continuation up to 60 days while the Nursing Facility is actively discharge planning.

The Nursing Facility will then diligently conduct discharge planning. Nursing Facility staff are expected to contact other agencies, other facilities, and in some cases may need to look outside of the area or county in order to find appropriate housing or placement. Nursing home staff are expected to contact the local DAIL LTCCC nurse and may also reach out to the local CFC Waiver team. It is expected that an appropriate discharge will occur before the allotted 60 days. The Nursing Facility will provide DAIL with documentation of active discharge planning and case notes upon request.

If after the allotted 60 days an appropriate and/or reasonable placement option is identified, however the participant declines to accept what is available, services will end. The Nursing Facility will no longer be able to bill Medicaid after this date.

If after the allotted 60 days an appropriate and/or reasonable placement option is not identified, the Nursing Facility may request a NAPA status extension. The Nursing Facility must submit to DAIL their detailed documentation including all case notes of all discharge efforts. DAIL will consult with the CFC Program Manager to decide upon granting a NAPA extension or granting a special circumstance for continued and ongoing eligibility. This will be determined on a case by case basis.

Note: If placement has been identified, but the Nursing Facility needs extra time to transition the participant, DAIL may grant a variance for extension. If an extension is granted, DAIL will send a revised letter with a new end date to the participant, Nursing Facility, and DCF. The length of time for variances for extensions will be determined on a case by case basis.

No extension shall be considered approved before notification has been received.

Nursing Facility staff may contact their local DAIL LTCCC nurse or the DAIL central office by calling (802) 871-3069.