

To: Tina Brill, Vice President, LTSS, Amerigroup
Stephani Ryan, Director, LTSS, BlueCare
John Madondo, Executive Director, LTSS, UnitedHealthcare
From: Krista Krueger, Policy Specialist, LTSS, Division of TennCare
Date: March 15, 2019
Subject: **TennCare Feedback on Employment and Community First CHOICES Automobile Insurance Requirements and Amendments to CRA Amendment 10**

The purpose of this memorandum is to provide additional feedback to all MCO questions and requests for guidance related to automobile insurance requirements for Employment and Community First CHOICES providers.

TennCare proposed revised language to MCOs related to CRA Amendment 10. Specifically, TennCare amended the CRA language to clarify the intentions of CRA section A.2.12.14.13.3. The MCOs responded with some additional requests for clarification. In response, TennCare offers the following guidance:

Automobile Coverage Requirements

There has been a miscommunication regarding the intent of CRA Section A.2.12.14.13.3 which requires automobile insurance coverage for Employment and Community First CHOICES providers. The goal of this section was to ensure that any provider that is expected to transport a member as a component of service delivery had the necessary insurance coverage in the event that an accident happened during the service delivery. Mistakenly, the language was not clear and was seen by MCOs as a barrier to many providers who do not transport members as a component of service delivery. The language in the CRA has been clarified with Amendment 10, and TennCare's actual expectation is for providers who are expected to transport the member as a component of service delivery to obtain and maintain automobile coverage in compliance with the Section referenced above. Employment and Community First CHOICES providers requiring this coverage are as follows: individual and small group employment supports (including pre-employment services), personal assistance, supportive home care, community integration support services, community transportation, independent living skills training, community living supports, and community living supports-family model.

If you need additional clarification regarding the guidance provided herein, please contact Krista Krueger at Krista.J.Krueger@tn.gov. Thank you for your continued assistance in providing innovative and needed services for Employment and Community First CHOICES and for your patience as we work to address any issues.