



KERN HEALTH SYSTEMS POLICY AND PROCEDURES			
Policy Title	Community Health Worker	Policy #	11.29-P
Policy Owner	Wellness and Prevention	Original Effective Date	3-15-2023
Revision Effective Date	1-2025	Approval Date	03/19/2025
Line of Business	<input checked="" type="checkbox"/> Medi-Cal <input type="checkbox"/> Medicare <input type="checkbox"/> Corporate		

I. PURPOSE

The Purpose is to define the process by which Kern Health Systems (KHS) and contracted Community Health Worker (CHW) Providers become qualified to provide CHW services, the covered services, and requirements to be followed to ensure compliance with Department of Health Care Services (DHCS) regulation.

II. POLICY

KHS will provide plan members with the CHW services benefit identified through DHCS All Plan Letter (APL) 24-006.

Per State Plan Amendment (SPA) 22-0001, CHW services are preventive health services as defined in Title 42 Code of Federal Regulations (CFR) Section 440.130 (c). CHW services may assist with a variety of concerns impacting Managed Care Plan (MCP) members, including but not limited to, the control and preventions or chronic conditions or infectious diseases, behavioral health conditions, and need for preventive services.

A. Enforcement

KHS will verify all providers submitting claims for CHW services have completed the CHW application and CHW Supervisor Attestation is submitted through the credentialing department.

B. Certification

1. CHW Provider Requirements and Qualification

CHWs must have lived experience that aligns with and provides a connection between the CHW, and the community or population being served. This may include, but is not limited to, lived experience related to incarceration, military service, pregnancy and birth, disability, foster system placement, homelessness, mental health conditions or substance use, or being a survivor of domestic or intimate partner violence or abuse and exploitation. Lived

experience may also include shared race, ethnicity, sexual orientation, gender identity, language, or cultural background of one or more linguistic, cultural, or other groups in the community for which the CHW is providing services.

Supervising providers are encouraged to work with CHWs who are familiar with and/or have experience in the geographic communities they are serving. Supervising Providers must maintain evidence of this experience.

CHWs must have lived experience that aligns with Member or population being served. CHWs must demonstrate qualifications through the Certificate Pathway or Work Experience Pathway and must provide proof of completion. A CHW who does not have a certificate of completion and yet has at least 2,000 hours working as a CHW in paid or volunteer positions within the previous three years, will have the ability to earn a certificate of completion, as described above, within 18 months of the first CHW visit provided to a member.

CHW violence prevention services are available to Members who meet any of the following circumstances as determined by a licensed practitioner:

- a. The Member has been violently injured as a result of community violence.
- b. The Member is at significant risk of experiencing violent injury as a result of community violence.
- c. The Member has experienced chronic exposure to community violence.

Note: CHWs must complete a minimum of six (6) hours of additional relevant training annually.

CHWs must meet the following to qualify as an asthma preventive services provider:

- a. A certificate from the California Department of Public Health Asthma Management Academy
- b. A certificate demonstrating completing of a training program consistent with the National Institute of Health's Guidelines for the Diagnosis and Management of Asthma with core competencies in the following areas:
 - i. Basic facts of asthma's impact on the human body, including asthma control
 - ii. Roles of medications
 - iii. Environmental control measures
 - iv. Teaching individuals about asthma self-monitoring
 - v. Implementation of a plan of care
 - vi. Effective communication strategies including at a minimum cultural and linguistic competency and motivational interviewing.
 - vii. Roles of a care team and community referrals
- c. And both of the following:
 - i. Completed a minimum of sixteen (16) hours of face-to-face client contact focused on asthma management and prevention.

Note: CHWs must complete a minimum of four (4) hours annually of continuing education on asthma.

CHWs must be supervised by a licensed provider, clinic, hospital, community-based organization (CBO), or local health jurisdiction (LHJ).

C. Supervising Provider Requirements

Supervising Providers must be a licensed provider, clinic, hospital (including emergency department), community-based organization (CBO), or local health jurisdiction (LHJ). Supervising Providers do not need to have a licensed Provider on staff in order to contract with KHS to bill for CHW services. Supervising Providers must maintain evidence of the CHWs lived experience and attest that they have verified the CHWs have lived experience that aligns with the population they are serving and have sufficient experience to provide services.

Supervising Providers must maintain evidence of CHW minimum qualifications through one of the following pathways:

1. CHW Certificate

A valid certificate of completion of a curriculum that attests to demonstrated skills and/or practical training in the following areas: communication, interpersonal and relationship building, service coordination and navigation, capacity building, advocacy, education and facilitation, individual and community assessment, professional skills and conduct, outreach, evaluation and research, and basic knowledge in public health principles and social drivers of health (SDOH), as determined by the Supervising Provider. Certificate programs must also include field experience as a requirement.

2. Violence Prevention Professional Certificate

For individuals providing CHW violence prevention services only, a Violence Prevention Professional (VPP) Certificate issued by Health Alliance for Violence Intervention or a certificate of completion in gang intervention training from the Urban Peace Institute. A VPP Certificate allows a CHW to provide CHW violence prevention services only. A CHW providing services other than violence prevention services must demonstrate qualification through either the Work Experience Pathway or by completion of a General Certificate.

3. Work Experience Pathway

An individual who has at least 2,000 hours working as a CHW in paid or volunteer positions within the previous three years and has demonstrated skills and practical training in the areas described above, as determined and validated by the Supervising Provider, may provide CHW services without a certificate of completion for a maximum period of eighteen (18) months. A CHW who does not have a certificate of completion must earn a certificate of completion, as described above, within eighteen (18) months of the first CHW visit provided to a member.

KHS has established a billing pathway for Supervising Providers, including contracted hospitals, to claim for provisions of CHW services to Members during an emergency department (ED) visit

and/or as outpatient follow-up to an ED visit. Refer to Policy and Procedure 6.01-P Claims Submission Reimbursement.

The Supervising Provider must maintain evidence of the annual the training requirements. CHWs are required to complete a minimum of six (6) hours in relevant training in either a core competency or specialty area. Supervising Providers may provide and/or require additional training, as identified by the Supervising Provider. KHS will monitor to ensure Supervising Providers or their Subcontractors contracting with or employing CHWs are providing adequate supervision and training. Providers will be required to demonstrate verification of supervision and training upon request of KHS.

The Supervising Providers must provide direct or indirect oversight to CHWs. Direct oversight includes, but is not limited to, guiding CHWs in providing services, participating in the development of a plan of care, and following up on the progression of CHW services to ensure that services are provided in compliance with all applicable requirements. Indirect oversight includes, but is not limited to, ensuring connectivity of CHWs with the ordering entity and ensuring appropriate services are provided in compliance with all applicable requirements.

The supervising provider does not need to be the same entity as the provider who made the written recommendation for CHW services. Supervising providers do not need to be physically present at the location when CHWs provide services to beneficiaries. Management and day-to-day supervision of CHWs as employees may be delegated as determined by the supervising provider.

D. Provider Enrollment

The KHS Network Providers will be required to enroll as Medi-Cal Providers if there is a state-level enrollment pathway for them to do so. Supervising Providers, with a state-level Medi-Cal enrollment pathway, must follow the standard process for enrolling through the DHCS' Provider Enrollment Division. Refer to Policy & Procedures (P&P) 4.01P Credentialing.

For the Supervising Providers that do not have a corresponding state-level enrollment pathway, they will not be required to enroll in the Medi-Cal program. Supervising Providers, without a state level Medi-Cal enrollment pathway, must complete the appropriate provider application, Supervising Attestation and Acknowledgement form for submission to KHS Credentialing for review and approval. KHS will verify the supervising provider meets the qualification as a licensed provider, or other acceptable supervising provider designated within a hospital, outpatient clinic, local health jurisdiction (LHJ) or a community-based organization (CBO), employing or otherwise overseeing the CHW, with which Kern Health Systems (KHS) contracts.

III. DEFINITIONS

N/A

IV. PROCEDURES

A. Member Eligibility Criteria

CHW services require a written recommendation submitted to KHS by a physician or other licensed practitioner of the health arts within their scope of practice under state law. For CHW services rendered in the Emergency Department (ED), the treating provider may verbally recommend initiating CHW services and later document the recommendation in the Members medical record. Other licensed practitioners who can recommend CHW services within their scope of practice include physician assistants, nurse practitioners, clinical nurse specialists, podiatrists, nurse midwives, licensed midwives, registered nurses, public health nurses, psychologists, licensed marriage and family therapists, licensed clinical social workers, licensed professional clinical counselors, dentists, registered dental hygienists, licensed educational psychologists, licensed vocational nurses, and pharmacists. The recommending licensed provider does not need to be enrolled in Medi-Cal or be a KHS network provider or be employed by the supervising provider. Referrals will be submitted to KHS by the provider portal and KHS will use JIVA, our internal medical management system, to monitor referrals sent to providers.

Provider must ensure that a member meets eligibility criteria before recommending CHW services. CHW services are considered medically necessary for Members with one or more chronic health conditions (including behavioral health) or exposure to violence and trauma, who are at risk for a chronic health condition or environmental health exposure, who face barriers in meeting their health or health-related social needs, and/or who would benefit from preventive services. The recommending Provider must determine whether a member meets eligibility criteria for CHW services based on the presence of one or more of the following:

1. Diagnosis of one or more chronic health (including behavioral health) conditions, or a suspected mental disorder or substance use disorder that has not yet been diagnosed.
2. Presence of medical indicators of rising risk of chronic disease (e.g., elevated blood pressure, elevated blood glucose levels, elevated blood lead levels or childhood lead exposure, etc.) that indicate risk but do not yet warrant diagnosis of a chronic condition.
3. Any stressful life event presented via the Adverse Childhood Events screening.
4. Presence of known risk factors, including domestic or intimate partner violence, tobacco use, excessive alcohol use, and/or drug misuse.
5. Results of a Social Determinant of Health (SDOH) screening indicating unmet health-related social needs, such as housing or food insecurity.
6. One (1) or more visits to a hospital ED within the previous six (6) months.
7. One or more hospital inpatient stays, including stays at a psychiatric facility, within the previous six (6) months, or being at risk of institutionalization.
8. One (1) or more stays at a detox facility within the previous year.
9. Two (2) or more missed medical appointments within the previous six (6) months.
10. Member expressed need for support in health system navigation or resource coordination services.

11. Need for recommended preventive services, including updated immunizations, annual dental visit, and well childcare visits for children.

CHW violence prevention services are available to Members who meet any of the following circumstances as determined by a licensed practitioner:

1. The Member has been violently injured as a result of community violence.
2. The Member is at significant risk of experiencing violent injury as a result of community violence.
3. The Member has experienced chronic exposure to community violence.

Medi-Cal will provide asthma self-management education to all beneficiaries with a diagnosis of asthma. Beneficiaries must have a current diagnosis of poorly controlled asthma, or on the recommendation of a licensed physician, nurse practitioner (NP), or physician assistant (PA), in order to receive an “in-home environmental trigger assessment.”

B. Covered CHW Services

CHW services can be provided as individual or group sessions. The services can also be provided virtually or in-person with locations in any setting including, but not limited to, outpatient clinics, hospitals, homes, or community settings.

Services include:

1. **Health Education:** Promoting a Member’s health or addressing barriers to physical and mental health care, such as through providing information or instruction on health topics.
Health Education content must be consistent with established or recognized health care standards and may include coaching and goal setting to improve a Member’s health or ability to self-manage their health conditions.
2. **Health Navigation:** Providing information, training, referrals, or support to assist Members to access health care, understand the health care delivery system, or engage in their own care. This includes connecting Members to community resources necessary to promote health; address barriers to care, including connecting to medical translation/interpretation or transportation services; or address health-related social needs. Under Health Navigation, CHWs can also:
 - a. Serve as a cultural liaison or assist a licensed health care Provider to participate in the development of a plan of care, as part of a health care team.
 - b. Perform outreach and resource coordination to encourage and facilitate the use of appropriate preventive services; or
 - c. Help a Member enroll or maintain enrollment in government or other assistance programs that are related to improving their health, if such navigation services are provided pursuant to a plan of care.
3. **Screening and Assessment:** Providing screening and assessment services that do not require a license and assisting a Member with connecting to appropriate services to improve their health.

4. Individual Support or Advocacy: Assisting a Member in preventing the onset or exacerbation of a health condition, preventing injury, or violence. This includes peer support as well if not duplicative of other covered benefits.

Services may be provided to a parent or legal guardian of a Member under age 21 for the direct benefit of the Member, in accordance with a recommendation from a licensed Provider. If the parent or legal guardian is not enrolled in Medi-Cal, the Member must be present when CHW services are provided. A service for the direct benefit of the Member must be billed under the Member's Medi-Cal ID.

CHWs may render street medicine, and the Supervising Provider will bill KHS for any appropriate and applicable services within their scope of service. Covered CHW services do not include any service that requires a license.

CHWs who do not meet the qualifications of an asthma preventive services provider may not provide asthma education or in-home environmental trigger assessments, but they may provide CHW services for health education and navigation to Members with asthma.

Refer to Policy 3.36-P Asthma Treatment and Management

Note: There are no Place of Service restrictions for CHW services.

C. Non-covered CHW Services

1. Clinical case management/care management that requires a license.
2. Childcare
3. Chore services, including shopping and cooking meals.
4. Companion services
5. Employment services
6. Helping a Member enroll in government or other assistance programs that are not related to improving their health as part of a plan of care.
7. Delivery of medication, medical equipment, or medical supply
8. Personal Care services/homemaker services
9. Respite care
10. Services that duplicate another covered Medi-Cal service already being provided to a Member.
11. Socialization
12. Transporting members
13. Services provided to individuals not enrolled in Medi-Cal, except as noted above
14. Services that require a license

CHWs may provide CHW services to Members with mental health and/or substance use disorders. CHW services do not include Peer Support Services as covered under the Drug Medi-Cal, Drug Medi-Cal Organized Delivery System, and Specialty Mental Health Services programs. CHW services are distinct and separate from Peer Support Services.

D. Covered APS Services

Medi-Cal Asthma Preventive Services (APS) will comprise clinic-based asthma self-management education, home-based asthma self-management education and in-home environmental trigger assessments for eligible beneficiaries of any age, as medically necessary, subject to applicable utilization controls. Pursuant to Title 42 of the Code of Federal Regulations, Section 440.130(c).

Refer to Policy 3.36-P Asthma Treatment and Management

E. Documentation Requirements

CHWs are required to document the dates and time/duration of services provided to Members. Documentation should also reflect information on the nature of the service provided and support the length of time spent with the patient that day.

Documentation must be accessible to the Supervising Provider upon their request. Documentation should be integrated into the Member's medical record and available for encounter data reporting. CHW's National Provider Identifier (NPI) number should be included in documentation.

F. Plan of Care

For members who need multiple ongoing CHW services or continued CHW services after twelve (12) units of services as defined in the Medi-Cal Provider Manual, a written care plan must be written by one or more individual licensed providers, with the exception of services provided in the Emergency Department, which may include the recommending Provider and other licensed Providers affiliated with the CHW Supervising Provider.

The Provider ordering the plan of care does not need to be the same Provider who initially recommended CHW services or the Supervising Provider for CHW services. CHWs may participate in the development of the plan of care and may take a lead role in drafting the plan of care if done in collaboration with the Member's care team and/or other Providers referenced in this section. The plan of care may not exceed a period of one year.

The plan of care must:

1. Specify the condition that the service is being ordered for and be relevant to the condition.
2. Include a list of other health care professionals providing treatment for the condition or barrier.
3. Contain written objectives that specifically address the recipient's condition or barrier affecting their health.
4. List the specific services required for meeting the written objectives; and
5. Include the frequency and duration of CHW services (not to exceed the Provider's order) to be provided to meet the plan's objectives.

A licensed Provider must review the Member's plan of care at least every six (6) months from the effective date of the initial plan of care. The licensed Provider must determine if progress is being made toward the written objective and whether services are still medically necessary. If there is a

significant change in the recipient's condition, Providers should consider amending the plan for continuing care or discontinuing services if the objectives have been met.

G. Monitoring

KHS reports all CHW service encounters to DHCS. Monitoring will include verification of CHW's ability to provide attested services. If appropriate training and certification are not able to be verified, Kern Health Systems has the right to recover any paid funds through our recovery process after thirty (30) days of notification. Supervising Providers will complete attestation certifying that their CHWs have the appropriate training, qualifications, and supervision.

KHS will use collected information to assess universal capture rates across KHS membership and implement data strategies. KHS uses the John Hopkins risk stratification tool for risk stratification and segmentation of the KHS population. Other data sources include but are not limited to past and current Member utilization/encounters, data on health risks and clinical care gaps, frequent hospitalizations or ED visits, Member demographics, and SDOH data, referrals and needs assessments. This will allow KHS to identify members who need more care and attention for their overall health and refer to CHWs for support to addressing health care needs. Providers will be required to use data driven approaches to determine and identify priority populations eligible for CHW services.

H. Billing, Claims, and Payments

CHW services must be reimbursed through a CHW Supervising Provider in accordance with its Provider contract. Billing pathways may be structured as a sub-capitated rate, an add-on rate to existing payments, or another billing and payment arrangement agreed upon by KHS and the Provider.

KHS will not require prior authorization for CHW services as they are a preventive service. CHW has quantity limits, with a maximum frequency of four (4) units (two hours) daily per beneficiary. Quantity limits can be applied based on goals detailed in the plan of care. Additional units per day may be provided with KHS approval for medical necessity. KHS will not establish unreasonable or arbitrary barriers for accessing coverage.

KHS adheres to the DHCS contractual requirements related to claims processing and encounter data submissions, including use of approved codes pursuant to the Medi-Cal Provider Manual for CHW Preventive Services. Claims for CHW services must be submitted by the Supervising Provider with allowable current procedural terminology codes as outlined in the Medi-Cal Provider Manual.

KHS, all Subcontractors and Network Providers must not double bill, as applicable, for CHW services that are duplicative to services that are reimbursed through other benefits such as Enhanced Care Management (ECM), which is inclusive of the services within the CHW benefit.

Refer to Policy 14.04-P Prevention, Detection, and Reporting of Fraud, Waste, or Abuse.

Note: Tribal clinics may bill for CHW services at the Fee-for-Service rates using the Current Procedural Terminology (CPT) codes as outlined in the Provider Manual. Pursuant to Welfare and Institutions Code (WIC) 14087.325(d), KHS must reimburse contracted Federally Qualified Health Centers (FQHC) and Rural Health Clinics (RHCs) in a manner that is no less than the level and amount of payment that KHS would make for the same scope of services if services were furnished by another Provider type that is not an FQHC or RHC.

I. Access requirements

KHS monitors the accessibility of contracted providers to members to obtain covered services and implements corrective measures when necessary. Refer to Policy 4.30-P Accessibility Standards.

J. Integration with population health management (PHM)

As part of the KHS Population Health Management Readiness Deliverable submission, KHS gained approval for a CHW Integration Plan which describes the Plan's strategies for supporting CHW integration and approach for building sustainable infrastructure and supports. The CHW Integration Framework will remain aligned with APL 22-016 Appendix A CHW Integration Plan.

THE KHS CHW Integration Plan focuses on the following required elements:

1. Integrate CHWs into health care delivery services.
2. Build capacity in Provider Networks to employ CHWs.
3. Communicate to Members about the scope of practice, benefits, and availability of CHW services.
4. Communicate to Providers about the scope of practice, benefits, and availability of CHW services.
5. MCP monitoring strategies.

K. DHCS Monitoring

KHS is responsible for ensuring that their Subcontractors and Network Providers comply with all applicable state and federal laws and regulations, Grievance and Appeal requirements, contract requirements, and other DHCS guidance, including APLs, Policy Letters and Dual Plan Letters. These requirements must be communicated by KHS to all Subcontractors and Network Providers.

V. ATTACHMENTS

Attachment	N/A
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VI. REFERENCES

Reference Type	Specific Reference
Other KHS Policies	4.01-P Credentialing

Other KHS Policies	4.30-P Accessibility Standards
Other KHS Policies	14.04-P Prevention, Detection, and Reporting Fraud, Waste, or Abuse
Other KHS Policies	3.36-P Asthma Treatment and Management

VII. REVISION HISTORY

Action	Date	Brief Description of Updates	Author
Revised	2025-01	The policy was revised to comply with DHCS APL 24-006, the policy was submitted to DHCS on 2/19/2025.	I.S. W&P
Revised	2024-07	Policy revised to comply with requirements of DHCS APL 24-006 and include language from DHCS Asthma Preventive Services (APS) manual. Received DHCS approval on 9-10-2024.	W&P
Revised	2023-12	Policy revised to comply with requirements of DHCS APL 22-016 – Approved by DHCS on 02-12-2024.	PNM
Revised	2023-09	Policy updated to include revised requirements of DHCS APL 22-016.	PNM
Revised	2023-06	Policy updated to include Integration with KHS Population Health Management (PHM) Readiness Deliverable and APL 22-024 PHM Policy Guide requirements aligned with APL 22-016 Appendix A CHW Integration Plan.	PNM
Created	2022-11	Policy was developed to comply with DHCS APL 22-016. DHCS approval was received on 1-19-2023.	PNM

VIII. APPROVALS

Committees Board (if applicable)	Date Reviewed	Date Approved
Choose an item.		

Regulatory Agencies (if applicable)	Date Reviewed	Date Approved
Department of Health Care Services (DHCS)	DHCS APL 24-006, 2/19/2025	03/14/2025
Department of Health Care Services (DHCS)	DHCS APL 24-006	9/10/2024

Department of Health Care Services (DHCS)	APL 22-016, 12-15-2023	02-12-2024
Department of Health Care Services (DHCS)	APL 22-016, 01-19-2023	01-19-2023
Department of Health Care Services (DHCS)	For DHCS APL 24-006 on 8-9-2024	9-10--2024

Chief Executive Leadership Approval *		
Title	Signature	Date Approved
Chief Executive Officer		
Chief Medical Officer		
Chief Compliance and Fraud Prevention Officer		
*Signatures are kept on file for reference but will not be on the published copy		



KERN HEALTH SYSTEMS

Policy and Procedure Review

KHS Policy & Procedure: 11.29-P- Community Health Worker

Previous implemented version: 12/6/2024

Reason for revision: The policy was revised to align with DHCS APL 24-006.

Director Approval		
Title	Signature	Date Approved
Isabel Silva Senior Director of Wellness and Prevention		
Amisha Pannu Senior Director of Provider Network		
Robin Dow-Morales Senior Director of Claims		
Sukhpreet Sidhu Population Health Medical Director		
Michelle Curioso Director of Population Health Management		

Date posted to public drive: _____

Date posted to website (“P” policies only): _____