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PATH Justice-Involved Capacity Building Guidance Round 2:  
Pre-Release Eligibility and Enrollment Implementation Support  
Updated: 2/27/2023

### Introduction

California statute ([AB-133 Health; Chapter 143](#)) mandates that all counties implement pre-release Medi-Cal enrollment processes by January 1, 2023. Establishing pre-release Medi-Cal enrollment processes is part of the state's vision to enhance the Medi-Cal health care delivery system for justice-involved populations. Implementation of pre-release enrollment and suspension processes will help ensure Medi-Cal coverage upon re-entry into the community in order to facilitate access to needed Medi-Cal covered services. These processes are also foundational to the provision of Medi-Cal services in the 90 days prior to release, as requested by the Department of Health Care Services (DHCS) through its [CalAIM 1115 Demonstration](#) request, which was approved on January 26, 2023.<sup>1</sup>

California has received targeted expenditure authority through Providing Access and Transforming Health (PATH) as part of its CalAIM Section 1115 demonstration. PATH is a \$1.85 billion initiative made up of two programs: one will support the implementation of Enhanced Care Management (ECM) and Community Support Services,<sup>2</sup> and the other will support the implementation of statewide justice-involved initiatives.<sup>3</sup> California's approved 1115 waiver [Special Terms and Conditions](#) provide additional details regarding both CalAIM and PATH initiatives.<sup>4</sup>

The DHCS CalAIM Section 1115 demonstration waiver initially requested a total of \$561 million in expenditure authority for PATH funding to support implementation of pre-release enrollment and suspension processes *as well as* pre-release and re-entry services. The final approved waiver includes \$151 million in expenditure authority to support implementation of pre-release enrollment and suspension processes. DHCS is currently negotiating approval for \$410 million in additional expenditure authority that will support implementation of pre-release and re-entry planning services that would be available to justice-involved individuals for 90 days prior to their release.

The PATH Justice-Involved Capacity Building Program will provide funding to support implementation of pre-release Medi-Cal application, enrollment, and suspension processes. This program will provide funding to support collaborative planning as well as IT system modifications necessary to implement pre-release Medi-Cal application,

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<sup>1</sup> Note that the Centers for Medicare & Medicaid Services (CMS) approved a portion of the 1115 demonstration request on December 29, 2021, including PATH Rounds 1 and 2.

<sup>2</sup> <https://www.dhcs.ca.gov/enhancedcaremanagementandinlieuofservices>.

<sup>3</sup> CalAIM 1115 Waiver Approved Special Terms and Conditions:

<https://www.dhcs.ca.gov/provgovpart/Documents/California-Reentry-Demonstration-Initiative-Amendment-Approval.pdf>.

<sup>4</sup> Ibid.



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enrollment, and suspension processes. This program will provide \$151 million in funding to correctional agencies,<sup>5</sup> correctional institutions, and county social services departments (County SSDs) that will be made available in two rounds:

1. **Round 1 is a planning grant** funding opportunity that will provide small planning grants to correctional agencies (or an entity applying on behalf of a correctional agency) to support collaborative planning with County SSDs and other enrollment implementation partners to identify processes, protocols, and IT modifications that are necessary to support implementation of pre-release enrollment and suspension processes.
2. **Round 2 is an implementation grant** funding opportunity that will provide larger application-based grants to support entities as they implement the processes, protocols, and IT system modifications that were identified during the Round 1 planning phase. While entities do not need to participate in Round 1 in order to apply for funding in Round 2, the Round 1 planning grant funds provide an opportunity to support the development of a comprehensive application for Round 2 funding.

**This document is solely focused on Round 2 of the PATH Justice-Involved Capacity Building Program.** Additional information regarding Round 1 of the PATH Justice-Involved Capacity Building Program may be found on the DHCS [CalAIM Justice-Involved Initiative webpage](#). PATH Round 1 Guidance is available [here](#), and Round 1 Funding Awards can be found [here](#).

#### Document Updates:

- February 2023: This Guidance was updated to reflect CMS' approval of California's 1115 Demonstration and provide additional guidance related to required letters of support and interim reporting requirements.
- January 2023: This Guidance was updated to reflect the content of All County Welfare Directors Letter (ACWDL) [22-27](#), which further details requirements for pre-release Medi-Cal applications. Additionally, two new permissible uses of Round 2 funding were added to support (1) correctional staff salaries to administer pre-release Medi-Cal applications in the near term and (2) setting up correctional facility processes to draw down Medicaid administrative activity funding to support staff salaries for Medi-Cal applications over the long term. DHCS expects PATH Round 2 applications to reflect the updated operational criteria that are included in this Guidance. Given the timing in releasing ACWDL 22-27 and related changes in the PATH Round 2 operational criteria, DHCS has extended the deadline for the PATH Round 2 application to March 31, 2023. Please email [justice-involved@ca-path.com](mailto:justice-involved@ca-path.com) if you anticipate any barriers to submitting your PATH Round 2 application by this date.

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<sup>5</sup> For the purposes of this document, "correctional agency" refers to county sheriff's offices, county probation offices, or the California Department of Corrections and Rehabilitation (CDCR).



## PATH Justice-Involved Capacity Building Program Round 2: Pre-Release Eligibility and Enrollment Implementation Support

### Overview

Round 2 of the PATH Justice-Involved Capacity Building Program will provide implementation grants to correctional agencies (or their delegates) and County SSDs (or their delegates) to support them as they implement processes, protocols, and IT system modifications that are necessary to implement or modify pre-release Medi-Cal enrollment and suspension processes. This funding can be used for investments in personnel, infrastructure, capacity, or IT systems that are needed to effectuate pre-release enrollment and suspension processes. Additional details regarding eligibility, the application process, and permissible uses of funding are described below. Eligible entities may apply for Round 2 of the PATH Justice-Involved Capacity Building Program via the [PATH JI Portal](#). Interested applicants are encouraged to carefully review the information below before completing their application.

### Eligibility

The following entities are eligible to apply for funding through this initiative: County SSDs, county sheriff's offices to support county jails, county probation offices to support youth correctional facilities, and the CDCR to support state prisons. The sheriff's office or probation office within a county must submit a joint application with the County SSD. The joint application must include separate budgets for the sheriff's office/probation office and County SSD. Sheriff's offices and probation offices will be required to work with their County SSD to support development of the application and budgets for this initiative. Sheriff's offices, probation offices, and County SSDs *may not* apply for funding independently. CDCR *may* apply for funding independently with a letter of support from the County Welfare Directors Association (CWDA).

In some counties, the department of public health, another county agency, or another external vendor actively manages correctional health services and is responsible for coordinating Medi-Cal screening, enrollment, and suspension for individuals in correctional institutions. In these cases, the county agency that is responsible for such coordination may apply for funding and manage awarded funds *in lieu of* the county sheriff's office, probation office, or County SSD if appropriate. For example, a county department of public health that manages the Medi-Cal screening, enrollment, and suspension processes for adult jails in the county may complete the application and receive awarded funds on behalf of the county sheriff's office. **If an alternative county agency or other delegate completes this application on behalf of a sheriff's office, probation office, or County SSD, that county agency will be required to include a letter of support from the local sheriff's office, probation office, or County SSD as part of its application.** Alternatively, if the correctional agency or County SSD completes the application but plans to use a delegate to manage pre-release Medi-Cal enrollment, the delegate must submit a letter of support. A single delegate may complete this



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application and receive awarded funds on behalf of the local sheriff's office, the local probation office, and the local County SSD if appropriate.

### Application Process

Correctional agencies and County SSDs will be eligible to apply for funding through this initiative through **March 31, 2023**. Entities are not required to have participated in Round 1 of the PATH Justice-Involved Capacity Building Program in order to apply for funding in Round 2. In order to receive funding in Round 2, entities will be required to complete a standardized application form developed by DHCS. This application form will collect the following information:

- The amount of funding requested, including completed budget templates from the correctional agency and the County SSD, and justification for why the funds are needed;
- A high-level plan describing how the applicant will implement or refine each of the operational criteria described in the “Operational Criteria” section below;
- A plan to support collaboration with County SSDs, community-based organizations, or other correctional agencies facilitating Medi-Cal application, enrollment, and unsuspension processes; and
- A description of a sustainability plan.

Applications will be reviewed by Public Consulting Group (PCG), a DHCS-contracted third-party administrator (TPA), for completeness and accuracy and to ensure that the intended uses of funding are permissible. The TPA will recommend applications for funding to DHCS within 30 days of receipt. DHCS will ultimately approve applications upon receipt from the TPA and will notify applicants of awards via email. If DHCS or the TPA identifies issues or questions related to applications, they may reach out to applicants via email to seek additional information. If applications are not approved or are pending additional information, DHCS or the TPA will respond in writing and will describe specific reasons for denial of the application or the specific information required to continue review of the application. In these cases, applicants will have 30 days to address issues flagged by DHCS or the TPA and resubmit applications for approval.

All awardees will be required to complete an Award Notification Packet, which will include grant terms and conditions, a W-9 form, and banking information. Applicants will have 30 calendar days from the date of their award notification to complete the Award Notification Packet.



### Application Timeline

Activity	Date
Application Open Date	January 30, 2023
Application Close Date	March 31, 2023
Applications Review	January 30, 2023 – March 31, 2023 <ul style="list-style-type: none"><li>Applications are reviewed by PCG within 30 days of submission</li></ul>
Award Notifications Sent	Five days after DHCS approval
Awardee Completes Award Notification Packet	Within 30 days of award notification
Awardee Receives First Payment	Within 45 days of grant agreement execution
Interim Progress Report Due	March 1, 2024 or once the awardee meets 5 out of 7 operational criteria, whichever occurs first (see additional details below under the Progress Reporting Requirements section).

### Operational Criteria

Round 2 applications will be assessed against a set of operational criteria that describe processes that correctional agencies and County SSDs are required to implement in order to receive PATH Round 2 funding. PATH Round 2 Operational Criteria reflect DHCS' updated requirements for the pre-release Medi-Cal application and enrollment process described in [ACWDL 22-27](#). Applicants should refer to this document, the ACWDL, or any applicable policy guidance released by DHCS to ensure responses are tailored to these updated requirements.

**Entities completing applications for Round 2 funding will be required to explain how they intend to use PATH funding to support the implementation or refinement of the pre-release Medi-Cal application and enrollment requirements described in ACWDL 22-27 and described at a high level below.** If a correctional agency/County SSD applicant has already implemented a Medi-Cal application and enrollment process that aligns with the requirements described below, it must explain how its process currently operates. Applicants may request technical assistance on standing up any of the processes described below by emailing [CalAIMJusticePreReleaseApps@dhcs.ca.gov](mailto:CalAIMJusticePreReleaseApps@dhcs.ca.gov).<sup>6</sup>

DHCS recommends that each County SSD, the county sheriff (for county correctional facilities), and the county probation officer (for county youth correctional facilities) work together with their respective county board of supervisors to identify the best way to implement a county pre-release Medi-Cal application and enrollment process. At minimum, counties must establish a process to assist incarcerated individuals by applying

<sup>6</sup> As a reminder, DHCS is still negotiating for approval of 90-day pre-release Medi-Cal services. We encourage you to consider and account for this likely future approval in your plan for the design and uses of Round 2 PATH funding for modifying application, enrollment, and suspension processes.



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for, or otherwise assisting in, their enrollment in Medi-Cal regardless of their length of incarceration.

Key elements of an effective pre-release Medi-Cal application and enrollment process include:

<b>Correctional Facility<sup>7</sup></b>	<b>County SSD</b>
<ul style="list-style-type: none"><li>▪ Establish a point of contact (POC) who will be responsible for the CalAIM mandatory pre-release Medi-Cal application and enrollment process.<ul style="list-style-type: none"><li>○ Maintain and make available a county-specific CCF pre-release POC list for the local County SSD.</li></ul></li><li>▪ Collaborate with the local County SSD pre-release POC to establish streamlined communications and processes between organizations.</li><li>▪ Establish a secure form of communication to transmit and receive information between both organizations. This can be via encrypted email or other forms of secure communication to ensure that information is exchanged effectively and expeditiously.</li></ul>	<ul style="list-style-type: none"><li>▪ Determine the POC who will be responsible for the CalAIM mandatory pre-release Medi-Cal application and enrollment process.<ul style="list-style-type: none"><li>○ Maintain and make available a CWD a pre-release POC list for the local CCFs.</li></ul></li><li>▪ Collaborate with the local CCFs to establish streamlined communications and processes between organizations.</li><li>▪ Establish a secure form of communication to transmit and receive information.</li></ul>

<sup>7</sup> ACWDL 22-27 sets forth the key elements and requirements for a pre-release Medi-Cal enrollment process for county correctional facilities (CCFs) and County SSDs. Policies and procedures for state inmates remain unchanged for the pre-release Medi-Cal enrollment process for county welfare directors (CWDs) and within CDCR state prison facilities as outlined in ACWDL 14-24. CDCR may apply for PATH Round 2 funding to improve existing processes and infrastructure and may strive to meet the key elements and requirements described in ACWDL 14-24 and 22-27.



Starting January 1, 2023, correctional facilities and County SSDs must meet the minimum requirements for facilitating pre-release Medi-Cal applications and enrollment processes, described below:<sup>8</sup>

Operational Requirements	Correctional Facility	County SSD
<p><b>Step 1: Initial Enrollment Screening</b></p>	<ol style="list-style-type: none"> <li>1. Screen the individual for Medi-Cal coverage during/near intake.</li> <li>2. Verify Medi-Cal enrollment through the DHCS enrollment verification system or in collaboration with the County SSD and identify individuals who are not currently enrolled in Medi-Cal. CCF must have processes in place to obtain consent to submit a Medi-Cal application on behalf of youth under 18 years old.<sup>9</sup> <ol style="list-style-type: none"> <li>a. <i>If the individual is enrolled in Medi-Cal and incarceration is not reported</i>, CCF shall communicate the incarceration details to the County SSD (including incarceration date and expected release date, if known).</li> <li>b. <i>If the individual is enrolled in Medi-Cal and incarceration or suspension is displayed</i>, CCF shall communicate the</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li>1. Collaborate with CCF to verify the current Medi-Cal enrollment status of the individual to assist CCF with identifying individuals who require a pre-release Medi-Cal application.       <ol style="list-style-type: none"> <li>a. <i>If the individual is enrolled in Medi-Cal and incarceration is not reported</i>, the County SSD can obtain the incarceration details from CCF, including incarceration date and expected release date (if known). If applicable, the County SSD shall suspend benefits.</li> <li>b. <i>If the County SSD determines that the individual is not enrolled in Medi-Cal</i>, the County SSD shall notify CCF of the current enrollment status so CCF can assist the individual with completing/submitting a pre-release application.</li> </ol> </li> </ol>

<sup>8</sup> See [ACWDL 22-27](#) for detailed requirements.

<sup>9</sup> See ACWDL 22-27 for detailed process requirements for working with individuals under 18 years old.



Operational Requirements	Correctional Facility	County SSD
	<p>expected release date to the County SSD, if known.</p> <p>c. <i>If the individual is not enrolled in Medi-Cal</i>, CCF shall assist the individual with completing/submitting a Medi-Cal application.</p>	
<p><b>Step 2: Application Submission and Processing</b></p>	<p>3. Complete and submit the Medi-Cal application. CCFs shall submit the Medi-Cal application at least 135 days before the individual’s release date (if known).</p> <p>a. CCF shall ask the individual for their desired mailing address and use this address on the application.</p> <p>b. If CCF uses a paper application, it should submit the application to the county where the individual intends to reside upon release.</p> <p>c. Applications of all forms (e.g., paper, electronic) should include a cover letter. <i>Note:</i> Cover letter requirements can be found in ACWDL 22-27.</p> <p>4. Communicate with the County SSD to troubleshoot any application questions, requests for follow-up information, and other information the County SSD needs to process the pre-release application.</p>	<p>2. Receive and process pre-release applications for CCFs. County SSDs must accept Medi-Cal applications via mail, online, phone, fax, or in person.</p> <p>a. If the County SSD receives an application for an individual expected to be released in a different county, the County SSD should coordinate with the county of responsibility to transition the application.</p> <p>b. County SSDs must work with the county youth correctional facility to ensure that the application for an incarcerated youth is processed appropriately.</p> <p>3. Communicate with CCF to troubleshoot application questions, requests for follow-up information, and other information needed to process the application.</p>





Operational Requirements	Correctional Facility	County SSD
<p><b>Step 3: Eligibility Determination</b></p>	<p>5. Ensure the individual has their County SSD’s contact information upon release.</p> <p>For individuals being released, CCF shall notify the County SSD of the individual’s release date, once known.</p> <ul style="list-style-type: none"> <li>○ CCF shall submit information to the County SSD within one week of the individual’s expected release and no later than one business day before release, unless release is unplanned.</li> <li>○ At a minimum, CCF shall provide the County SSD with the individual’s full name (and any known aliases), date of birth, CIN/SSN, and known/estimated release date.</li> </ul>	<p>a. The County SSD should initiate an intercounty transfer if necessary.</p> <p>4. Notify CCF if the Medi-Cal determination is not expected to be complete before the individual’s release (if the release date is known).</p> <p>5. Notify the applicants of the outcome of their eligibility determination, provide all necessary Medi-Cal documentation (i.e., Notices of Action), and issue a Benefits Identification Card (BIC), if applicable.</p> <ul style="list-style-type: none"> <li>○ Where there is an immediate need for services, the County SSD shall arrange with CCF to issue a temporary BIC to the individual so they can access Medi-Cal benefits upon release.</li> </ul> <p>6. Provide contact information for the County SSD in the county in which the individual will reside.</p> <p>7. Once notified of the individual’s release date, the County SSD must activate/unsuspend Medi-Cal benefits by reporting the release date in MEDS.</p>
<p><b>Suspension/ Un suspension</b></p>	<ul style="list-style-type: none"> <li>▪ CCF shall notify the County SSD as soon as they become aware of an individual’s expected release date.</li> </ul>	<p>1. Where an immediate need for services must be established, the County SSD shall follow the standard Immediate Need process.</p>



Operational Requirements	Correctional Facility	County SSD
<p>County SSDs will not suspend Medi-Cal for individuals who are released within 28 days. For individuals who are released after 28 days, the County SSD will record the incarceration in MEDS on the 29th day and suspend Medi-Cal accordingly.</p>	<ul style="list-style-type: none"> <li>▪ CCF shall make every effort to submit confirmation of the release date information to the County SSD within <i>a week of the expected release date and no later than one business day</i> (except in the case of unplanned releases; in these circumstances, the CCF shall give as much notice as possible to the County SSD).</li> </ul>	<p>2. The County SSD shall activate coverage within <i>one business day of notification</i> with the ultimate goal of ensuring the individual can obtain services upon release.</p>
<p><b>Data Sharing</b></p>	<p>Both County SSDs and CCFs shall enter into written agreements that impose, at a minimum, the same restrictions and conditions with respect to Medi-Cal personally identifiable information (Medi-Cal PII) that apply to the County SSD through the Medi-Cal Privacy and Security Agreement between the County SSD and DHCS, released via <a href="#">ACWDL 19-16</a>, or any applicable superseding ACWDL. These shall include:</p> <ol style="list-style-type: none"> <li>1. Restrictions on disclosure of Medi-Cal PII;</li> <li>2. Conditions regarding the use of appropriate administrative, physical, and technical safeguards to protect Medi-Cal PII; and, where relevant,</li> </ol>	



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Operational Requirements	Correctional Facility	County SSD
	3. The requirement that any breach, security incident, intrusion, or unauthorized access, use, or disclosure of Medi-Cal PII be reported to the County SSD.	



### Permissible Uses of Funding

This funding is intended to support the direct implementation of pre-release enrollment and suspension processes. Funds from this round can be used for investments in infrastructure, capacity, or IT systems that are needed to effectuate pre-release enrollment and suspension processes. Funding recipients may pass through funding to individual correctional institutions, vendors, and other entities as needed to support implementation activities. Please note that County SSDs may only use PATH funding to support implementation activities that are not eligible for administrative or Medicaid Enterprise System matching funds from CMS. If entities are unsure of whether their planned activities would qualify as permissible uses of funding under this initiative, they are encouraged to check with the PATH TPA prior to submitting their application, by emailing [justice-involved@ca-path.com](mailto:justice-involved@ca-path.com) with the subject line “PATH Round 2.”

Specific permissible funding uses include but are not limited to the following:

- Modifying technology and IT systems needed to support Medi-Cal enrollment and suspension processes (including, for example, building or updating data systems to track individuals who cycle in and out of incarceration, or building or updating systems to integrate health and eligibility data into one platform);
- Recruiting, hiring, onboarding, and training staff to assist with the coordination of Medi-Cal enrollment and suspension for justice-involved individuals;
- Development or modification of protocols and procedures that specify steps to be taken in preparation for and execution of the Medi-Cal enrollment and suspension processes for eligible individuals;
- Facilitating collaborative planning activities between correctional institutions, correctional agencies, County SSDs, and other stakeholders as needed to support planning, implementation, and modification of Medi-Cal enrollment and suspension processes;
- Modifications to physical infrastructure to support implementation of Medi-Cal pre-release enrollment and suspension processes;
- **NEW:** Supporting salaries for correctional facility staff or their delegates (e.g., CBO, health department, County SSD) who administer the pre-release Medi-Cal application and enrollment process (i.e., assisting applicants with completing and submitting applications) for a limited time, until Medicaid Administrative Activity (MAA) funding becomes available (subject to the guardrails described below);<sup>10</sup>
- **NEW:** Setting up infrastructure/processes for correctional facilities (or their delegate) to draw down MAA funding to support salaries of staff who administer the pre-release Medi-Cal application and enrollment processes; and Other activities approved by the state.

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<sup>10</sup> County SSDs are not eligible to apply for salary support for processing (i.e., reviewing and making eligibility determinations) pre-release Medi-Cal applications, as these costs are currently budgeted in Medi-Cal Local Assistance and are expected to be an ongoing administrative cost.



In addition to the permissible uses of funding described above, PATH Round 2 funding may be used to support staff salaries for positions that support the planning or implementation of pre-release Medi-Cal application and enrollment processes. The following guardrails apply if applicants leverage PATH funding to provide the salaries of staff who support the planning, implementation, or administration of the pre-release Medi-Cal application and enrollment processes:

- PATH funds may only support the portion of a full-time-equivalent position (FTE) associated with pre-release applications (e.g., if an FTE dedicates 10% of their time to planning/implementation of the pre-release Medi-Cal application and enrollment processes, the entity may apply for PATH funds to cover 10% of that FTE's salary).
- Requests for salary support must be reasonable relative to the salaries for similar positions within the region.
- Applicants may apply for up to 5% additional funding (as compared to the requested funding for salary) to support indirect costs.<sup>11</sup>
- Direct salary support may include costs associated with reasonable rates for fringe benefits.
- County SSDs may only allocate PATH Round 2 funding to support the salaries of new positions.

DHCS has not set a deadline or time frame by which awardees must spend their PATH Round 2 awards across most permissible uses of funding, with the exception of salary support, which will be time-limited, as described below:<sup>12</sup>

- County SSDs: County SSDs must expend their allocation to salaries of staff who support the planning/implementation of the pre-release Medi-Cal application and enrollment processes within 18 months after they receive the award.
- Correctional facilities (or their delegate):
  - For staff who support the planning/implementation of the pre-release Medi-Cal application and enrollment processes, correctional facilities must expend their staff salary allocation within:
    - 18 months after they receive it for new positions; or
    - 12 months after they receive it for existing positions with new responsibilities.

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<sup>11</sup> "Indirect costs" are defined as administrative overhead expenses that are not readily identified with or directly pertinent to the funding request but are necessary for the general operation of activities outlined in the funding request.

<sup>12</sup> Applicants may request extended time to expend PATH Round 2 funding if necessary.



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For staff who administer pre-release Medi-Cal applications (i.e., assist applicants to complete and submit applications), correctional facilities must expend their staff salary allocation within two years, at which point MAA funding will become available.

Applicants may request funding to support one or more of the permissible use categories described above. When entities apply for funding, they will be required to include in their application the total funding amount requested and a high-level description of how the requested funding will be used. Additionally, entities will be required to submit a separate budget template to the TPA to provide additional detail on their funding request as it relates to each permissible use category described above.

This budget template will collect information including descriptions, justifications, and requested funding associated with each item or activity for which the applicant is requesting funding. Correctional agencies and County SSDs submitting joint applications must use a single budget template to report their two separate budgets.

#### Funding Methodology

The maximum amount of funding that applicants are eligible to request will depend on the type of applicant and the number of correctional institutions within their jurisdiction.

Applicant Type	Funding Limit
CDCR	\$100,000 per correctional facility
County SSDs	\$150,000 per adult jail and youth correctional facility
Probation office	\$250,000 per youth correctional facility
Sheriff's office	\$500,000 per adult jail

If the applicant applied for Round 1 funding, any unspent funds from the previous round may be rolled over to Round 2. Approved applicants will receive 80% of approved funding within 45 days of the execution of their grant agreement and will receive the remaining portion of approved funding upon completion of an interim progress report.

Please see the Progress Reporting Requirements section below for additional information on the progress report process.

#### Progress Reporting Requirements

Funding recipients will be required to submit an interim progress report to the PATH TPA to describe their progress in implementing or refining pre-release enrollment and suspension processes. Correctional agencies and County SSDs will submit progress reports separately. Interim progress reports will be due by **March 1, 2024 or** when the awardee has **met 5 out of 7 operation criteria**, whichever occurs first.

The progress reports will collect the following information, at a minimum:

- A narrative description of the entity's capabilities and processes to support the



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programmatic requirements necessary to implement its pre-release enrollment processes, including progress toward each operational criterion described in program applications and which operational criteria they have met at the time they submit their interim progress report;

- A high-level explanation of how the funds have been used to date;
- An attestation of the non-duplication and supplantation of PATH funding; and
- A description of collaborations or working sessions with local County SSDs, local Medi-Cal managed care plans, and county behavioral health agencies.

**Correctional Agencies:** Correctional agencies will be required to submit an interim progress report by **March 1, 2024, or** once they have successfully implemented any **five of the seven correctional agency operational criteria** described in the Operational Criteria section above, whichever comes first. Interim progress reports submitted by correctional agencies will be reviewed and approved by the PATH TPA according to criteria developed by DHCS.

Correctional agencies will receive the remaining 20% of their approved funding upon submission and approval of their interim progress report. Correctional agencies will also be required to submit a final progress report once they have successfully implemented each of the operational criteria described in the Operational Criteria section above.

**County SSDs:** County SSDs will be required to submit an interim progress report by **March 1, 2024, or** once they have successfully implemented any **five of the seven County SSD operational criteria** described in the Operational Criteria section above, whichever occurs first. Interim progress reports submitted by County SSDs will be reviewed and approved by the PATH TPA according to criteria developed by DHCS.

County SSDs will receive the remaining 20% of their approved funding upon submission and approval of their interim progress report. County SSDs will also be required to submit a final progress report once they have successfully implemented each of the operational criteria described in the Operational Criteria section above.

When entities submit their final progress report, they will be required to attest that they have successfully implemented each of their respective operational criteria. Templates for the interim and final progress reports as well as details on the submission processes will be released at a later date. Both correctional agencies and County SSDs will be required to complete a readiness assessment before fully implementing pre-release Medi-Cal services. Information included in final progress reports for PATH Round 2 may be leveraged to complete readiness assessments at a later date. Please find additional information on the readiness assessment and the readiness assessment form in MEDIL 22-46 ([Correctional facilities](#)) and 22-27 ([County SSDs](#)).

#### Program Oversight and Monitoring

DHCS and the PATH TPA will take multiple steps to ensure adequate program oversight and monitoring, including the following:



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- Funding recipients will be required to attest that:
  - PATH funding will be expended as described in the program application and budget template and will only be used to support permissible uses of funding.
  - PATH funding will not duplicate or supplant funding received from other federal, state, or local sources.
- Funding recipients may be required to respond to general inquiries from DHCS or the TPA pertaining to this initiative and progress toward activities described in program applications. Entities that fail to meaningfully engage with DHCS or the TPA in response to these inquiries may be:
  - Subject to audit and, if necessary, recoupment by DHCS to ensure adequate documentation, application, and reporting of permissible expenditures only; and/or
  - Precluded from receiving additional PATH funding.
- Funding recipients are required to alert DHCS and the TPA if circumstances prevent them from carrying out activities described in program applications. In these cases, entities may be required to return unused funds to DHCS depending on the circumstances in question.
- Funding recipients will be required to submit progress reports in a manner and of a frequency determined by DHCS. Failure to submit progress reports or include required information may preclude the entity from receiving additional PATH funding. Funding recipients will be expected to complete an attestation of system readiness following the completion of Round 2 activities.
- DHCS or the TPA may conduct spot audits to ensure funds are spent on permissible uses and are documented and reported appropriately.

### Questions

Thank you for your interest in the PATH Justice-Involved Capacity Building Program. If you have general questions about the PATH Justice-Involved Capacity Building Program or any of the information included in this document, please email [justice-involved@ca-path.com](mailto:justice-involved@ca-path.com) with the subject line “PATH Round 2.”