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Montana Medicaid State Plan Amendment effective July 1, 2024

On or before March 31, 2024, the Montana Department of Public Health and Human Services (DPHHS) will submit a Montana Medicaid Tribal Health Improvement Program (THIP) State Plan Amendment (SPA) effective July 1, 2024, for Centers for Medicare and Medicaid Services (CMS) approval.

THIP is being redesigned to align the program with the Primary Care Case Management entities (PCCMe) federal requirements. DPHHS is proposing a two-step approach to the redesign.

Step One

The first step is to amend the THIP to a 3-tiered 100% care coordination program. This proposal aims to keep the services that are already being provided in Tier 1 and keep the reimbursement rates. The proposal outlines providing care coordination to 10% of attributed members in Tier 1, 25% of attributed members in Tier 2, and 40% of attributed members in Tier 3.

DPHHS also proposes to move the authority for this program from a 1915(b) waiver that requires renewal every two years, to a 1932(a) SPA that would have long term approval. DPHHS is looking to include the following PCCMe functions in the 1932(a) SPA submittal:

- Telephonic and face-to-face case management services;
- Development of enrollee care plans; and
- Enrollee outreach and education activities.

In response to the request of Montana Tribes during an in-person consultation held October 25-26, 2023, DPHHS will be looking into an inflation adjustment factor for the Per Member Per Month (PMPM) rates and a transition period to attest to the new Tier 2 requirements for the THIP's already operating at Tier 2.

Step Two

The second step addresses another request of the Tribes during the in-person consultation to review 42 Code of Federal Regulations 438.14 for authority to allow the Little Shell Tribe to participate as an eligible provider, as the Tribe does not have a reservation. DPHHS agrees to examine this authority and will need time to fully research all the possible impacts to the THIP, including the effects on other Tribes. Potential changes to the program eligibility criteria will require further consultation with the Tribes.

The total estimated annual impact of the amendment is budget neutral.

DPHHS is committed to an extensive public process. We invite your comments and questions on this amendment called in, emailed or postmarked **through March 18, 2024**. You may direct comments to the Medicaid State Plan Amendment and Waiver Coordinator, at (406) 444-2584 or dphhscomments@mt.gov; or Director's Office, PO Box 4210, Helena MT 59604-4210.