



Date: July 18, 2025

To: Montana Health Coalition Members, Ad Hoc Members, and Interested Parties

From: Rebecca de Camara, Medicaid and Health Services Executive Director/Medicaid State Director

Subject: **1115 Health and Economic Livelihood Partnership (HELP) Demonstration Waiver**

The Montana Department of Public Health and Human Services (DPHHS) is providing public notice of its intent to: (1) submit to the Centers for Medicare and Medicaid Services (CMS) a Section 1115 Demonstration application to request federal authority for enrollees to be subject to community engagement requirements and cost sharing as a condition of Medicaid enrollment in accordance with HR 1 and the Montana Code Annotated and (2) hold public hearings to receive comments on the 1115 Demonstration application. DPHHS is seeking a five-year approval of the Demonstration and aims to implement the waiver as soon as is practicable following federal approval.

DPHHS is seeking a Section 1115 Demonstration waiver to comply with Montana legislative requirements (MCA 53-6-1307, 53-6-1308, and 53-6-1309) and advance the Gianforte administration's commitment to helping Montanans become self-sufficient and independent while reducing government dependency. DPHHS will also seek to align and comply with recently enacted federal requirements included in HR 1 related to community engagement and cost sharing for Medicaid enrollees.

Specifically, the HELP Demonstration program seeks to require non-exempt enrollees to meet community engagement requirements and pay premiums as a condition of enrollment. By requiring working age, able-bodied adult Medicaid enrollees to take an active role in their health care and become engaged in their communities, Montana can achieve lasting improvements in both the health and economic well-being of its citizens, as well as the financial health of the Medicaid program.

Summary of Proposed Waiver Features

Montana is seeking:

- Community Engagement: To require non-exempt individuals age 19 – 64 to participate in 80 hours per month of community engagement activities to gain Medicaid coverage and continue to participate in community engagement

activities to maintain an active Medicaid enrollment status in the Demonstration; and

- Cost Sharing: To require non-exempt individuals to pay gradually increasing monthly premiums not to exceed four percent of their income, the amount of which is dependent upon the number of years of enrollment in the Demonstration. Additionally, DPHHS recognizes that HR 1 requires the collection of copayments for expansion enrollees by October 1, 2028. It is the state's intention to eventually implement copayments as required by HR 1 and as permitted by MCA.

The HELP Demonstration program will apply to all non-exempt Medicaid expansion adults aged 19-64 with an income up to 138% of the federal poverty level (FPL). Separate from the requirements set forth in HR 1, Montana is requesting authority for additional exemptions based on state statute, including but not limited to those that are mentally or physically unable to work, foster parents, or primary caregivers for a person who is unable to provide self-care.

The State does not propose any other changes to the Medicaid health care delivery system or benefits offered to enrollees.

Public Meetings and Comment Process

In accordance with federal regulation (42 CFR § 431.408), DPHHS is providing the public and other interested parties with the opportunity to review and offer input on the waiver through a formal, 30-day public notice and comment process which will run from July 18, 2025, to August 18, 2025. The draft of the Montana HELP waiver can be found at help.mt.gov. Paper copies are available to be picked up in person at the DPHHS Director's Office located at 111 North Sanders Street, Room 301, Helena, Montana. Access to the Director's Office is restricted for security purposes so members of the public should call (406) 406-9772 upon arrival to receive a paper copy of the waiver application. Two public meetings will be held regarding the Demonstration application:

1. July 31, 2025, from 3:00 to 5:00 pm MT (in-person and virtual)
Cogswell Building, Conference Rooms C205, C207, and C209 (combined)
1400 E. Broadway St.
Broadway Entrance, south side of building
Helena, MT
2. August 1, 2025, from 3:00 to 5:00 pm MT (virtual only for non-Montana Health Coalition members)
Montana Health Coalition Meeting
111 North Sanders Street
Room 306
Helena, MT

The public hearing on July 31, 2025, will be a hybrid meeting and the public may attend in-person or virtually. The public hearing on August 1, 2025, will be held as part of a Montana Health Coalition meeting and will be accessible to the public virtually only due to building security restrictions. To register for one or both meetings visit help.mt.gov.

Individuals who require special accommodation to attend these public meetings should contact Carla Rime at (406) 444-2584 or by email at crime2@mt.gov to ensure that any necessary accommodation can be provided.

Questions or formal public comments may be submitted until 11:59 pm MT on August 18, 2025. Questions or public comments may be submitted via email to dphhscomments@mt.gov with "HELP Demonstration Waiver" in the subject line, or by mail to:

Department of Public Health and Human Services
Director's Office
RE: HELP Waiver
P.O. Box 4210
Helena, MT 59604-4210

Please note that comments will continue to be accepted after August 18, but the state may not be able to consider those comments prior to the submission of the Demonstration application to CMS.

After Montana reviews comments submitted during the state public comment period, DPHHS will submit a potentially revised application to CMS. Interested parties will also have an opportunity to formally comment during the federal comment period; the submitted application will be available for comment on the CMS website at <https://www.medicaid.gov/medicaid/section-1115-demo/demonstration-and-waiver-list>.