



Department of Public Health and Human Services

Director's Office ♦ PO Box 4210 ♦ Helena, MT 59620 ♦ (406) 444-5622 ♦ Fax: (406) 444-1970 ♦ www.dphhs.mt.gov

Steve Bullock, Governor

Sheila Hogan, Director

January 31, 2020

Address, etc.

Re: Montana Medicaid Severe Disabling Mental Illness (SDMI) Home and Community Based Waiver Changes – Tribal Consultation Call scheduled for Thursday, February 20, 2020 at 9:00 am to discuss changes and potential impacts

Dear :

The Montana Department of Public Health and Human Services (DPHHS) is pleased to invite comment from all Tribal Chairs, Tribal Presidents, Urban Indian Health Center Directors and the Indian Health Service (IHS) regarding upcoming Medicaid waiver changes. On or before March 31, 2020, DPHHS will submit a request to the Centers for Medicare and Medicaid Services (CMS) to renew the Montana Medicaid Severe and Disabling Mental Illness (SDMI) 1915(c) Home and Community Based Services (HCBS) Waiver and concurrent 1915(b)(4) SDMI Waiver, for an effective date of July 1, 2020.

Under our agreement, we provide you notice of all Medicaid State Plan and waiver changes. I am also inviting you to participate in a tribal consultation conference call on these Medicaid waiver changes **on Thursday, February 20, 2020, from 9:00 a.m. to 11:00 a.m.** The call details are at the end of this letter.

The Montana Medicaid SDMI 1915(c) HCBS Waiver **provides long term services in support to members with a severe and disabling mental illness in a community setting as an alternative to receiving long term care services in a nursing facility setting.** It is a combination 1915(c) and 1915(b)(4) waiver, combining an extensive array of services with conflict free case management statewide.

Montana Medicaid members can access the waiver if they meet a nursing home level of care, have an approved SDMI diagnosis and level of impairment, and are 18 years of age or older. The proposed waiver renewal includes changes in the number of members served, the services offered, and language improvements to clearly describe the program design.

Members Served:

The following increases in the number of members served is proposed:

- The waiver currently serves up to 357 members statewide.
- DPHHS is proposing to increase the total unduplicated members served up to 600 in year one, 650 in year two, and 750 in years three through five.
- There is a proposed reserve capacity in the waiver for individuals discharging from Montana State Hospital, Montana Mental Health Nursing Care Center, and individuals accessing Money Follows the Person.

Services Offered:

The following changes are proposed to improve to service definitions and/or modify payment rates:

- Services have been removed, added, and amended/combined to better serve the behavioral needs and symptomology of members with severe and disabling mental illness and to alleviate duplicative services. Four services - Specially Trained Attendant, Habilitation Aide, Homemaker, and Lifecoach - have been removed and combined into one new service: Recovery Assistant.
- Pre-vocational services are removed due to underutilization and an inherent duplication with Support Employment.
- Proposed rates were established for new services: Recovery Assistant, Representative Payee, Intensive Mental Health Group Homes, and Mental Health Group Homes.
- Residential Habilitation has been amended to add two new levels of Group Home services: Mental Health Group Home and Intensive Mental Health Group Home.
- Personal Assistance Services, agency-based and self-directed, have proposed rate increases.

Program Design:

The following changes are proposed to improve the overall program design and operations:

- The SDMI definition has been updated to reflect current terminology. This does not reflect a change in eligibility for the waiver.
- Eligibility groups and Montana post-eligibility treatment of income were amended to reflect the accurate information.
- The SDMI determination form has been replaced with the Severe and Disabling Mental Illness, Home and Community Services Waiver, Evaluation and Level of Impairment form.
- A member's placement on the waitlist will be determined by their combined scores from the level of care assessment and level of impairment evaluation. There will no longer be an additional assessment to determine a member's placement on the waitlist.
- Additional oversight has been added for incident management. The definition for serious occurrences has been updated and classified under critical and non-critical. This also includes generating monthly reports to monitor serious occurrences and a monthly utilization report for emergency room visits.

To aid your review, I have indicated below which SDMI Waiver changes directly impact Tribes, Urban Indian Health Centers, IHS, or tribal members:

- **The additional waiver slots will be available statewide, which may improve availability of these waiver services to American Indians;**
- **The proposed new services, Recovery Assistant, Intensive Mental Health Group Home, and Mental Health Group Home may provide an increased opportunity to be served within their community; and**
- **The rate increases for Personal Assistance Services, both agency-based and self-directed, may assist with staff shortages due to the ability to pay an increase salary to individuals providing personal care services.**

The projected average annual cost of services is approximately \$28,600 per member. The proposed total cost of the waiver is approximately \$16,600,000 with an expected cost offset by state plan services of approximately (-\$10,000,000), for a net proposed cost of approximately \$6,600,000.

The draft of the 1915(c) HCBS SDMI Waiver amendment and a detailed summary of changes are available for review at:

<https://dphhs.mt.gov/amdd/mentalhealthservices/severedisablingmentalillness-sdmi-homeandcommunitybased-hcbs-waiverprogram>. Hard copies are available upon request.

The Department is committed to an extensive public process. We want you to have an opportunity to review the proposed action, understand the concepts, and offer your comments.

You have the opportunity to send DPHHS your written comments and questions **by 5:00 p.m. on Thursday, March 3, 2020**. You may direct comments to Mary Eve Kulawik, Medicaid State Plan Amendment and Waiver Coordinator, at (406) 444-2584 or mkulawik@mt.gov; or Director's Office, PO Box 4210, Helena, MT 59604-4210.

In addition to the opportunity to provide written comments, **we have scheduled a formal tribal consultation call to discuss this SDMI Waiver** and the proposed changes and potential impacts.

Call details are listed below:

Date: Thursday, February 20, 2020
Time: 9:00 am – 11:00 am
Dial in: 1-406-444-4647
Access code: 4737894#

We look forward to visiting with you more about the SDMI waiver. Should you have any further questions, please reach out to Mary Eve Kulawik or Lesa Evers. Thanks.

Sincerely,

Marie Matthews
State Medicaid Director

c: [Tribal Health Director]
Jason Smith, Director, Governor's Office of Indian Affairs
Lesla Evers, Tribal Relations Manager, DPHHS