



July 18, 2025

[First Name] [Last Name]

[Title]

[Organization]

[Address]

[City], [State] [Zip]

Re: Montana Section 1115 Health and Economic Livelihood Partnership (HELP)
Demonstration Application

Dear [Last Name]:

The Montana Department of Public Health and Human Services (DPHHS) would like to request your participation in a formal Medicaid Tribal Consultation regarding the Department's intent to submit to the U.S. 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. DPHHS is seeking a five-year approval of the Demonstration and aims to implement the waiver as soon as is practical 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). 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 expansion enrollees.

Consultation topics address the proposed waiver features:

- Revised Medicaid eligibility verifications.
- New community engagement requirements and exemptions.
- Changes in premium structure and copayments.

Montana is seeking:

- Community Engagement: To require non-exempt individuals aged 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 4% 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 who are mentally or physically unable to work, foster parents, or primary caregivers for a person who is unable to provide self-care.

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

A draft of the 1115 HELP Demonstration 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 59601. 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.

The Department will be hosting a virtual Medicaid Tribal Consultation. The Department will present information regarding the changes indicated in this letter for further engagement and discussion with Tribal Governments, Urban Indian Organizations, and Indian Health Service. The virtual consultation meeting will be held:

Tuesday, July 29

3:00 p.m. – 5:00 p.m.

Tribal Consultation Registration Zoom link:

https://mt-gov.zoom.us/webinar/register/WN_bry9pFs4RCW87Xs7IOXRag

Under our agreement, the Department provides notice of all Medicaid State Plan and Waiver changes. To aid your review, we have indicated whether there will be a direct

impact on reimbursement or coverage for American Indians/Alaska Natives. With the exemptions for work requirements and cost sharing, the impact of this waiver submittal will be mostly neutral. Urban Indian Organizations may see a negative impact for non-native Medicaid members who may lose coverage because of the work requirements.

The Department invites comments from all Tribal Governments, Urban Indian Organizations, and Indian Health Service regarding the 1115 HELP Waiver application. Comments to this waiver submission will be accepted in writing until 11:59 p.m. (Mountain Time) on August 18. 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 initial submission of the demonstration application to CMS.

After Montana reviews comments submitted during the state public comment period, the state will submit a revised application to CMS. Interested parties will also have an opportunity to officially 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>.

Sincerely,

Rebecca de Camara
Medicaid and Health Services Executive Director, DPHHS

CC: [Tribal Health Directors]
Misty Kuhl, Director, Governor's Office of Indian Affairs
Stephanie Iron Shooter, Director, Office of American Indian Health, DPHHS
Mary LeMieux, Administrator, Health Resources Division, DPHHS

Enclosed: Virtual Medicaid Tribal Consultation agenda for the 1115 Health and Economic Livelihood Partnership (HELP) Waiver