



Steve Bullock, Governor
Sheila Hogan, Director

November 12, 2020

The Honorable [First Name] [Last Name]
[Title]
[Organization]
[Address]
[City], [State] [Zip]

Re: Montana Medicaid State Plan and Waiver Amendments – Comments due by December 12, 2020

Dear [Title] [Last Name]:

The Montana Department of Public Health and Human Services (DPHHS) is pleased to invite comment from all Tribal Governments, Urban Indian Health Centers, and Indian Health Service (IHS) regarding upcoming Montana Medicaid State Plan and Waiver amendments that DPHHS will be submitting for Centers for Medicare and Medicaid Services approval on or before December 31, 2020.

Under our agreement, DPHHS provides you 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.

Subject: Adding Family Planning to the Eligibility Application

Effective Date: January 1, 2021
State Plan Section: Medicaid Eligibility

Montana is integrating the state's 1115 Plan First Demonstration Waiver (family planning at 42 CFR 435.214) into the CHIMES eligibility system. One of the eligibility requirements of the Plan First Waiver is that a woman be able to bear children/become pregnant. Therefore, DPHHS plans to add the following question to Montana's single streamlined Medicaid application (HCS-256), the multi-program application (HCS-250), and the online application via the Self Service Portal at apply.mt.gov:

"If you are female, not currently pregnant, and between the ages 19-44, are you able to bear children?"

This amendment **will positively impact** Tribes, Urban Indian Health Centers, and IHS if they offer any family planning services because women's eligibility for the Plan First Waiver can be determined during the general Medicaid eligibility determination process.

Subject: Home Support and Comprehensive School and Community Treatment (CSCT) Services for Youth with Serious Emotional Disturbance (SED)

Effective Date: January 1, 2021

State Plan Section: Early Periodic Screening, Diagnostic and Treatment Services (EPSDT)

The EPSDT State Plan will update the rates for Home Support Services (HSS) and CSCT Services for Youth with SED. The change in CSCT rate does not change the amount of money received by mental health centers that provide services to students in Montana public schools but more accurately reflects the rate in dollars that mental health centers receive for CSCT services. (Montana Administrative Register (MAR) Notice 37-933)

The HSS change **will potentially increase** access to HSS services for all youth, including American Indians. The CSCT change **does not impact** Tribes, Urban Indian Health Centers, or IHS.

Subject: Psychiatric Residential Treatment Facilities (PRTF) Fee Schedule

Effective Date: January 1, 2021

State Plan Section: PRTF

The PRTF State Plan will be amended because it shares a fee schedule with the EPSDT State Plan. PRTF reimbursement rates will not change. (MAR 37-933) These changes **do not impact** Tribes, Urban Indian Health Centers, or IHS.

Subject: Rate Increase and Additional Self-Direct Option for Services for Individuals with Severe Disabling Mental Illness

Effective Date: January 27, 2021

Waiver: Home and Community Based 1915(c) Montana Medicaid Severe Disabling and Mental Illness (SDMI) Waiver Amendment

After the implementation of the SDMI Waiver renewal effective July 1, 2020, DPHHS received stakeholder feedback requesting a self-direct option for the service of Behavioral Intervention Assistant. DPHHS has reviewed this request and determined that adding a self-direct option with a corresponding rate for Behavioral Intervention Assistant will allow an additional service delivery option for Montanans statewide, particularly in frontier and rural areas. Upon review, DPHHS also determined it would be appropriate to add the option for self-direction and a corresponding rate to Life Coach services. This

ensures equality of service options for individuals in agency-based services and self-directed services.

DPHHS has also determined that Assisted Living Facility and Adult Foster Homes daily rate increases in the SDMI Waiver are required to address and remedy identified barriers to access and quality service delivery for Montanans across the state. The congregate care services identified are necessary to serve the high needs of Montana Medicaid residents in the least costly setting.

The SDMI Residential Habilitation - Assisted Living Facilities and Adult Foster Homes rate will increase to \$104.00 per day from a \$80.24 maximum rate per day.

In addition, DPHHS has reviewed the waiver and will address issues identified in service definitions and limits, provider qualifications, projections, and overall consistency of waiver language.

The SDMI Waiver changes **will positively impact** Tribal Governments, Urban Indian Health Centers, and IHS.

The draft SDMI Waiver Amendment is available for review on November 13, 2020 at <https://dphhs.mt.gov/amdd/mentalhealthservices/severedisablingmentalillness-sdmi-homeandcommunitybased-hcbs-waiverprogram>. The state, upon request, will make available hard copies of the waiver amendment.

DPHHS is committed to an extensive public process. We want to provide you the opportunity to review the proposed action, understand the concepts, and offer comments. For further information, you may view the MAR Notice online at the following Proposed Notice web site: <https://www.dphhs.mt.gov/legalresources/rules/index.shtml>.

We invite your comments and questions on these State Plan and Waiver amendments postmarked **through December 12, 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.

Sincerely,

Marie Matthews
State Medicaid Director

c: Tribal Health Directors
Jason Smith, Director, Governor's Office of Indian Affairs
Lesia Evers, Tribal Relations Manager, DPHHS