

# BIG SKY WAIVER REVIEW – CONSTITUENT MEETINGS

DECEMBER 3, 2020 MEETING MINUTES

## MEETING OVERVIEW

The Big Sky Waiver review process continued on December 3, 2020. The meeting included discussion of:

1. Review of updated draft policy sections:
  - 401 Eligibility
  - 402 Slot Categories
  - 405 Referrals
  - 406 Wait List
  - 409 Out of State
  - 411 IDD/SDMI
  - 702 Service Limits
  - 722 Personal Assistance Services
2. Review of issue resolution log
3. Review of sections of the services chapter of the Big Sky Waiver policy manual, specifically:
  - 737 Vehicle Modifications
  - 706 Community Transition
  - 709 Day Habilitation
  - 725 Post-acute Rehabilitation Services
  - 728 Residential Habilitation
  - 714 Health and Wellness
  - 721 Pain and Symptom Management
  - 723 Personal Emergency Response System
  - 726 Prevocational Services
  - 735 Supported Employment
  - 730 Respite Care
  - 715 Homemaker

As always, input was solicited in advance of the meeting through a survey as well as throughout meeting discussion. Work in this meeting was driven by our shared goals defined in the October 22, 2020 meeting:

- **Increase communication.** Increase communication to ensure an increased flow of accurate, consistent information between all stakeholders.
- **Improve waiver functionality.** The waiver should function better, efficiently and effectively supporting members, providers, and managers.

## UPDATED DRAFT BSW POLICIES

DPHHS is drafting updates to Big Sky Waiver policies based on decisions made in this review process. Updated policies can be found at the Big Sky Waiver Review webpage: <https://dphhs.mt.gov/sltc/bswreviewworkgroup>.

We reviewed eight draft policies on December 3<sup>rd</sup>. Procedures are being moved to a standalone procedures manual, which should make the policy easier to understand.

Policy	Discussion Points
401 Eligibility for Services	<ul style="list-style-type: none"> <li>• Distilled down to what makes a member eligible for Big Sky Waiver.</li> <li>• Will rely on Office of Public Assistance to determine eligibility.</li> <li>• Communication/information sharing process needs to be defined between Office of Public Assistance and case management teams to implement policy successfully.</li> <li>• Received a question after the meeting regarding whether the policy aligns with the administrative rule 37.40.1708, which states that a person must be “certified as disabled by the Social Security Administration but does not have a primary diagnosis of mental retardation or serious mental illness.”</li> <li>• Meeting attendees did not provide additional input.</li> </ul>
402 Slot Categories	<ul style="list-style-type: none"> <li>• Streamlined and updated policy, removing Bridges/Headway since this program no longer exists.</li> <li>• Meeting attendees did not provide additional input.</li> </ul>
405 Referrals	<ul style="list-style-type: none"> <li>• Updates consisted of language changes – nothing substantive was changed.</li> <li>• Meeting attendees did not provide additional input.</li> </ul>
406 Wait List	<ul style="list-style-type: none"> <li>• This policy was not fully complete in advance of the meeting, but we reviewed it because attendees brought it up in conjunction with eligibility policy and processes.</li> <li>• Participants discussed timeframes for completing the wait list criteria tool with members. The timeframe is currently 60 days, and we discussed whether this could/should be shortened to 30 days. Meeting attendees talked about how eligibility process changes could support a shortened timeframe, and how most members are assessed for the waiting list in less than 60 days.</li> <li>• The policy needs to be further updated to clarify communication timeframes and clarify communication around short term admissions.</li> </ul>
409 Out of State	<ul style="list-style-type: none"> <li>• This policy brought up questions about travel policies and processes, with several examples of medical and nonmedical transportation issues experienced by members and providers.</li> <li>• This policy needs to be further updated with clarified language.</li> </ul>
411 IDD/SDMI	<ul style="list-style-type: none"> <li>• Added Part C dual eligibility limitations to this policy, which was originally in 702 Service Limitations.</li> <li>• Participants provided feedback on the policy, which needs further updating to clarify processes and timing.</li> <li>• The post-meeting feedback on ARM 37.40.1708 impacts this policy as well.</li> </ul>
702 Service Limits	<ul style="list-style-type: none"> <li>• Streamlined language and created new section about Big Sky Waiver being the payor of last resort.</li> </ul>

Policy	Discussion Points
	<ul style="list-style-type: none"> <li>The language around Indian Health Services and payor of last resort needs to be updated based on recent State Plan language.</li> </ul>
722 Personal Assistance Services	<ul style="list-style-type: none"> <li>The subsection on specially trained attendants was removed from this policy section, and will be its own standalone policy.</li> <li>Meeting attendees did not provide additional input.</li> </ul>

Stakeholders are welcome to provide additional input on draft policies to Kirsten Smith over email ([ksmith@bloomconsult.org](mailto:ksmith@bloomconsult.org)).

## ISSUE RESOLUTION LOG

DPHHS is working through the issues brought up in this review process before making policy language changes. The policy issue log below includes issues discussed in the 2020 Big Sky Waiver review process and suggested resolutions by the Department of Public Health and Human Services. Meeting participants discussed these proposed resolutions. DPHHS will continue to draft policy, procedure, and regulatory changes based on these discussions. This is not a complete action item log, rather it focuses on specific and substantive policy discussions from previous meetings for which DPHHS has proposed resolutions. There are other specific areas for which DPHHS continues to research potential solutions; they will be added to the list once proposals are ready. Additionally, general policy changes (e.g., moving to person first language, use of functional model) will be incorporated broadly into draft policy changes for constituent review and discussion and are not reflected in the table.

Issue	Resolution
1. Nonmedical transportation authorization period and mileage limits (718)	<ul style="list-style-type: none"> <li>Will move to an annual authorization period with case management team reporting expectations.</li> <li>Mileage will be determined in person-centered planning process.</li> </ul>
2. Equipment matrix and prior authorization (733-2)	<ul style="list-style-type: none"> <li>Designed to aid case managers in knowing commonly purchased items, not to be limiting or exclusive. Will remove matrix from policy.</li> </ul>
3. Specially trained attendant policy placement	<ul style="list-style-type: none"> <li>This will become a standalone policy section.</li> </ul>
4. Money management policy definition and provider qualifications	<ul style="list-style-type: none"> <li>This will become a standalone service and policy section.</li> <li>SLTC is working closely with AMDD on these definitions and they are still in progress.</li> </ul>
5. Shared services delivery policy placement	<ul style="list-style-type: none"> <li>This will become a standalone policy section.</li> </ul>

Issue	Resolution
6. Big Sky Bonanza policy organization	<ul style="list-style-type: none"> <li>• These policy sections will be organized as their own chapter or clear subsection to make it clearer which services belong solely in this program.</li> </ul>

## NEW POLICY REVIEW

We reviewed a number of policies regarding services. Discussion points and action items are included in the table below.

Policy	Discussion Points
737 Vehicle Modifications	<ul style="list-style-type: none"> <li>• The group discussed the history of vehicle modifications and CMS correspondence.</li> <li>• Attendees agreed that the goal is to ensure the waiver supported the purchase of vehicle modifications for members.</li> <li>• The group talked about how this may look different for new versus used vehicles, but how both should be options.</li> <li>• DPHHS has an action item to analyze CMS approved vehicle modification services and present options to the group for further discussion.</li> </ul>
706 Community Transition	<ul style="list-style-type: none"> <li>• A participant asked for additional information about what provider operated means, provider qualifications, who can use this service, and when.</li> <li>• These questions will be considered in the draft update.</li> </ul>
709 Day Habilitation	<ul style="list-style-type: none"> <li>• Participants asked whether this service could be billed hourly versus daily, as can be done in DD.</li> <li>• DPHHS will look into this and let everyone know.</li> </ul>
725 Post-acute Rehabilitation Services	<ul style="list-style-type: none"> <li>• Meeting attendees talked about how this service is not currently provided by providers in the state. The service will remain in the waiver in the hope that providers will once again provide it.</li> </ul>
728 Residential Habilitation	<ul style="list-style-type: none"> <li>• A person commented about a desire to be very clear about what this level of service means, including transportation and retainer days.</li> <li>• DPHHS will update the draft policy for review and discussion.</li> </ul>
714 Health and Wellness	<ul style="list-style-type: none"> <li>• People commented that the waiver requires health care professionals to authorize all of the services within this section annually.</li> <li>• DPHHS will clarify expectations for these services in our next meeting.</li> </ul>
721 Pain and Symptom Management	<ul style="list-style-type: none"> <li>• People commented that the waiver requires health care professionals to authorize all of the services within this section annually.</li> <li>• DPHHS will clarify expectations for these services in our next meeting.</li> </ul>
723 Personal Emergency Response System	<ul style="list-style-type: none"> <li>• An individual commented that it would be helpful to scope out when the waiver could pay for a PERS since Community First Choice includes PERS, and the waiver is the payor of last resort.</li> </ul>

Policy	Discussion Points
	<ul style="list-style-type: none"> <li>Attendees also asked whether the definition of PERS can be broadened to include new technology options like an Alexa or mobile phone applications.</li> <li>DPHHS has this research as an action item.</li> </ul>
726 Prevocational Services	<ul style="list-style-type: none"> <li>A person commented that the policy needs to be updated to reflect current Workforce Innovation and Opportunity Act (WIOA) standards.</li> <li>DPHHS will update the draft policy with this as a lens.</li> </ul>
735 Supported Employment	<ul style="list-style-type: none"> <li>A person commented that the policy needs to be updated to reflect current Workforce Innovation and Opportunity Act (WIOA) standards.</li> <li>DPHHS will update the draft policy with this as a lens.</li> </ul>
730 Respite Care	<ul style="list-style-type: none"> <li>Meeting attendees discussed how members need to use lifespan respite before using waiver respite care services, and how the cost of lifespan respite creates barriers for its use, thus keeping members from being able to use waiver respite care.</li> <li>A participant shared how this service cannot be self-directed.</li> <li>DPHHS will look into self-direction for this service and will update the draft policy regarding lifespan respite and waiver respite care.</li> </ul>
715 Homemaker	<ul style="list-style-type: none"> <li>A participant shared how this service cannot be self-directed.</li> <li>DPHHS will look into self-direction for this service and will come back to the group.</li> </ul>

## NEXT STEPS

We will continue to meet on Thursdays, 2-4 PM through December 17 to discuss the Big Sky Waiver policy manual. You will continue to receive materials in advance so we can target the meeting to the policy sections needing the most attention. Zoom meeting information for upcoming meetings is: <https://us02web.zoom.us/j/84053126840>; Meeting ID: 840 5312 6840; Phone: (346) 248-7799. Feel free to share the details of the meeting with other interested parties – everyone is welcome!

If you have additional feedback you were unable to share in the meeting, please use this survey to let us know what you're thinking: <https://survey.alchemer.com/s3/6009448/MT-Big-Sky-Waiver-Post-Meeting-Feedback>.

Reach out to Kirsten or Barb anytime with questions or comments. You can reach Kirsten at [ksmith@bloomconsult.org](mailto:ksmith@bloomconsult.org) or 406/570.0058 and Barb at [BarbaraSmith@mt.gov](mailto:BarbaraSmith@mt.gov).