

Partnership for Hope Waiver Public Comment

This document contains a summary of the public comments collected in response to the Partnership for Hope (PFH) Waiver amendment. This amendment is being submitted to expand the geographic region of the waiver by adding three counties, New Madrid, Pemiscot, and St. Louis County. The Centers for Medicare and Medicaid Services (CMS) requires states to obtain public input during the development of a waiver (or a waiver renewal or a waiver amendment with substantive changes). Public comment was taken from June 26, 2015 to July 27, 2015. The public comment notice, along with a copy of the amended waiver application, was published on the Department of Social Services website on June 25, 2015. Public notice was also published in five newspapers, The Columbia Tribune, Independence Examiner, Kansas City Star, Springfield News-Leader and The St. Louis Post Dispatch, on June 26, 2015. The public notice provided the following:

- A summary of changes to the waiver
- An address for submission of written and electronic comments
- A deadline for submission of comments
- The date, time, location and call-in number for three public forums
- The location to obtain paper and electronic versions of the waiver application

The amendment was available to the public on June 25, 2015. There were three public forums held. In accordance with CMS guidance, the amendment was made available for public comment for 30 days after June 26, 2015 to allow all consumers, providers and stakeholders an opportunity to provide input to the plan. In addition to electronic posting on the Department of Social Services website, paper copies of the PFH Waiver Amendment were distributed to Missouri Regional Offices and at the public forms. Braille copies and American Sign Language (ASL) interpreters were also available at the public forums upon request.

During the public comment period, MO HealthNet Division (MHD) and Department of Mental Health (DMH) received comments from:

SSM Health
St. Louis ARC
Sunnyhill
Easter Seals
Parents
Advocates

The following represents a summary of letters received from SSM and an Advocate. No changes were made to the Waiver Amendment as a result of any comments in this section.

The following question is from SSM Health:

Question: It was recently brought to my attention that the §1915(c) Home and Community-Based Services Waiver has been expanded to serve individuals in St. Louis County. It appears that this expansion will include 40 individuals who have intellectual disabilities and may be expanded to include more people in the future. Is this a correct summary?

Also, have the 40 individuals been selected, or will they be enrolling in a first-come first-served bases starting tomorrow? Finally, is there a lead agency that will be handling these enrollments in St. Louis County (Such as St. Louis ARC or the St. Louis Chapter of the Down Syndrome Association)?

Response: Yes, this is correct. Individuals will be enrolled on a first-come, first-served basis. St. Louis County Regional Office will handle the enrollments.

The following questions were submitted by an advocate:

Question: Citizens and many DMH workers are not knowledgeable of the Partnership for Hope waiver; being educated in this area would let citizens know the full range of options they have. Additionally, Partnership for Hope waiver funding is made available to individuals that do not use it to the fullest extent. Again, being educated on Partnership for Hope waiver would make ones way of life easier and more enjoyable. The unused funding is a clear sign that assistance is needed in this area

Response: Statewide public meetings have been held to educate the public on the Partnership for Hope waiver. Anyone requesting this waiver must be enrolled in Regional Office services with an assigned support coordinator and have Medicaid. In helping individuals and families identify resources, the support coordinators at the Regional Offices will educate individuals and their families on their caseloads about the Partnership for Hope waiver.

Question: There needs to be balance. Example: One person is awarded \$12,000 and uses only ¼ or ½ of the funding; but then another person has extensive needs and who receive the \$12,000 and \$3,000 extension but may need a second extension for equal or lesser value to assist in covering all the service needs. The second consideration could be to cut out the \$3,000 extension altogether and make the same amount of funds available for more individuals who may not require only minimal assistance.

Response: If an individual's needs consistently exceed the \$12,000 cap plus the \$3,000 extension, the Partnership for Hope waiver might not be the appropriate waiver for that person. There is another waiver called the Community Support Waiver that has a \$28,000 cap, as well as three other waivers. The person's support coordinator would request the most appropriate waiver to meet the person's needs.

The following addresses the questions and comments during the three public forums and public comment period. No changes were made to the Waiver Amendment as a result of any comments in this section.

Question: Does the DMH know of any reasons that St. Louis County would not support the PFH waiver? What are the negatives?

Response: DMH is not aware of any negatives or limitations. There are roughly 100 counties participating in the PFH waiver.

Question: How many persons are anticipated to be served in St. Louis County?

Response: The PFH amendment will cover 40 participants in St. Louis County.

Question: Are there going to be expansions in other waivers?

Response: There are limits on all five (5) DMH waivers. Expanding capacity in the Developmental Disabilities waivers would depend on the appropriations from the next legislative session. If the need to expand capacity were identified, an amendment would be sent to the CMS.

Question: There are conflicting reports on what PFH funding looks like. If the child's needs exceed the PFH budget, would this keep them from being assigned to the PFH waiver?

Response: The child's needs would be looked at on a case-by-case basis and the planning team would determine which waiver could best meet the child's needs.

Question: Does the sheltered workshop provide case management for the PFH waiver?

Response: No, the sheltered workshop does not provide case management for individuals in the PFH waiver. Support Coordination (i.e. case management) is provided by the St. Louis Regional Office or other contracted Targeted Case Management (TCM) entities.

Question: A request was made to provide the history of the PFH waiver.

Response: The Partnership for Hope Waiver began October 1, 2010. This is a new county-based waiver that is a result of a partnership of the Missouri Association of County Developmental Disabilities Services, the Division of Developmental Disabilities, and the MO HealthNet Division. Early research on best practices and the waiver development was supported by a grant from the Missouri Foundation for Health to the Missouri Association of County Developmental Disabilities Services. This waiver can serve adults and children and has an annual total waiver service cost limit per participant of \$12,000. Eligibility requirements for participants includes being eligible for Missouri Medicaid, meeting eligibility criteria for Division of DD services, participants needs can be met with current community support system and waiver services not to exceed an annual cost of \$12,000, participant meets ICF/ID Level of Care, participant resides in a participating county, participant meets crisis or priority criteria.

Question: Who will provide case management in St. Louis County since the SB40 does not provide?

Response: The St. Louis Regional Office will provide case management.

Question: If participant has Medicare and Medicaid coverage, how would that work?

Response: The waiver is the payer of last resort. If Medicare covers a service that the individual needs then Medicare must be billed prior to Medicaid (the waiver).

Question: Can you provide some examples of services offered in the PFH waiver?

Response: Several of the services in the PFH waiver were discussed and explained.

Question: Is there an age limit on the PFH waiver?

Response: There is no age limit.

Question: Where is the funding coming from to eliminate the wait lists?

Response: Legislative approval was given to eliminate in-home waitlists.

Question: What happens if a child is getting services before and after school and ages out of the school system?

Response: The planning team will look at services needed for the child to be successful if needs exceed PFH.

Question: How will families be notified when the amendment is approved?

Response: Department of Mental Health sends out regular electronic notifications to DD Regional Office staff, TCM entities and their staff, contracted providers, and stakeholders regarding various information. Additionally, Support Coordinators would notify families.