

MISSOURI DEPARTMENT OF SOCIAL SERVICES SECTION 1115  
DEMONSTRATION APPLICATION  
Public Notice – Updated  
January 10, 2020

The Missouri Department of Social Services (DSS), MO HealthNet Division (MHD) is providing a revised public notice of its intent to submit to the Centers for Medicare and Medicaid Services (CMS) a written 1115 Demonstration application for a Targeted Benefits for Pregnant Women program.

This notice revises a prior notice issued on July 10, 2019. The revisions to this public notice include additional detail related to the 1115 Demonstration enrollment projections and expenditures, waiver authorities and treatment adherence.

**Demonstration Overview**

During the 2018 Legislative Session, the Missouri General Assembly enacted House Bill 2280, extending the eligibility coverage period for women receiving Medicaid benefits who have recently given birth and been assessed by a qualified physician, licensed medical provider, qualified addiction professional or licensed mental health professional as needing SUD treatment.

The Missouri Department of Social Services (DSS), MO HealthNet Division (MHD), is submitting this request for a Section 1115 Demonstration Program in order to comply with the enacted legislation. The intent of the demonstration is to preserve and improve access to quality SUD and mental health treatment for women who have recently given birth and have been assessed by a qualified physician, licensed medical provider, qualified addiction professional or licensed mental health professional as needing SUD treatment.

The additional benefits will provide access to continuous SUD and mental health treatment in the most cost effective manner while demonstrating improved outcomes for Medicaid participants. The demonstration will expand SUD and mental health treatment benefits for women during the twelve (12) months following termination of their pregnancy benefits. Currently, access to treatment terminates at the end of the month in which the sixtieth day post-delivery falls, leading many women to return to use of substances after giving birth. This demonstration would allow the MHD to maintain treatment access to qualifying women for an additional calendar year.

**Demonstration Purpose, Goals and Objectives**

This application for the Targeted Benefits for Pregnant Women Demonstration complies with the legislative intent of the bill enacted by the Missouri General Assembly and the goals of the waiver as outlined below.

The anticipated results of implementation of the 1115 Demonstration Program include:

- Increased adherence to and retention in SUD treatment plans;
- Reduction in SUD related hospitalizations and emergency room visits;
- Strengthened safeguards for the health and safety of women and children during the postpartum period and first year of the newborn's life; and
- Improvement in health outcomes for women and children.

### **Demonstration Eligibility**

Currently, pregnant women who are determined eligible for MO HealthNet benefits, with income up to 196% of the FPL, are considered eligible for all MO HealthNet benefits, including pregnancy related and postpartum services, until the end of the month in which the sixtieth day after delivery falls. The demonstration proposes continuation of SUD and mental health services for an additional twelve (12) calendar months. Following enrollment in the demonstration, women will remain eligible for these benefits for twelve (12) calendar months (effective the month following the 60<sup>th</sup> day after delivery), even if there are changes in income during the eligibility period. In addition to meeting all requirements for Medicaid during the sixty-day postpartum period, in order to qualify for a participation in the Targeted Benefits for Pregnant Women Demonstration, the following must be present:

- Diagnosed and assessed by a qualified physician, licensed medical provider, qualified addiction professional or licensed mental health professional as having an SUD and in need of SUD treatment during the sixty (60) day post-partum eligibility period;
- Adherence to substance use treatment plan; and
- Ineligible for other Medicaid funded SUD and mental health treatment benefits.

### **Demonstration Benefits and Cost Sharing**

The benefits provided to participants in the Targeted Benefits for Pregnant Women Demonstration will be limited to those related to treatment of SUD including mental health services and transportation to and from treatment. These benefits have not yet been finalized and are subject to change related to revisions of the State Plan, currently under review by CMS.

All enrollees in the demonstration will be eligible for the same benefit package for the duration of their participation in the demonstration. There is no restriction on SUD or mental health services, as coverage is based on services currently available through the existing state plans. There are no anticipated cost sharing modifications related to copayments, liabilities or deductions.

### **Demonstration Delivery System**

The Section 1115 Demonstration Program application only impacts eligibility. Individuals who are eligible for sixty (60) days postpartum Medicaid and who are complying with the

treatment requirements outlined in the demonstration will continue to receive Medicaid coverage for SUD and mental health treatment through fee for service as they do currently.

**Demonstration Hypotheses and Evaluations**

<b>Hypothesis</b>	<b>Example measures</b>	<b>Data Sources</b>
<b><i>Goal 1: Increased adherence to and retention in SUD treatment plans</i></b>		
Percentage of individuals with a new episode of alcohol or other drug dependence (AOD) who receives AOD treatment within 14 days of the diagnosis will be maintained or increased under the demonstration.	Initiation NQF 0004	MMIS
Percentage of individuals who initiated treatment and received two or more additional services with a diagnosis of AOD within 30 days of the initiation visit will be maintained or increased under the demonstration.	Engagement NQF 0004	MMIS
<b><i>Goal 2: Reduction in SUD related hospitalizations and emergency room visits</i></b>		
The percentage of ER visits by women for AOD for which patients receive follow-up with any provider for a corresponding primary diagnosis within 7 days of discharge will be maintained or increased under the demonstration.	Successful Care Transition NQF 2605	MMIS
The percentage of women patients receiving follow up care with any provider for a corresponding primary diagnosis within 30 days of discharge after an ER visit for AOD will be	Successful Care Transition NQF 2605	MMIS

maintained or increased under the demonstration.		
ER visits for SUD-related diagnoses will be maintained or reduced under the demonstration.	ER visits for SUD-related diagnosis per 1,000 member months	MMIS
Inpatient hospital admissions for SUD will be maintained or reduced under the demonstration.	Inpatient admissions for SUD among Medicaid beneficiaries per 1,000 member months	MMIS
Inpatient hospital readmissions for SUD will be maintained or reduced under the demonstration	30-day readmission rate following hospitalization for an SUD-related diagnosis	MMIS
<b><i>Goal 3: Strengthened safeguards for the health and safety of women and children during the postpartum period and first year of the newborn's life</i></b>		
The number of visits for therapy related to SUD diagnosis during the postpartum period will be increased during the demonstration	Therapy visits for SUD-related diagnosis per 1,000 member months	MMIS
<b><i>Goal 4: Improvement in health outcomes for women and children</i></b>		
The number of reports of child abuse/neglect involving infants of mothers with SUD will decrease under the demonstration	Reported instances of abuse/neglect for infants testing positive for drug exposure at birth	FACES

**Waiver Authorities**

Missouri requests, under the authority of Section 1115(a)(1) of the Social Security Act (the Act), that CMS waive the following requirements of Title XIX of the Act to enable implementation of this Demonstration:

- 1. Amount, Duration and Scope of Services Section 1902(a)(10)(B)**  
 To the extent necessary to enable the state to offer a limited SUD and mental health benefit package to the Demonstration Population that differs from the benefits offered under the Medicaid State Plan.

Missouri requests, under the authority of Section 1115(a)(2) of the Act, that expenditures made by the state for the items identified below, which are not otherwise included as expenditures under Section 1903 of the Act, shall, for the period of this Demonstration, be regarded as expenditures under the State Plan:

**Expenditures for the Demonstration population.** Expenditures for an eligibility period of twelve (12) months following the sixty (60) day post-partum eligibility period for women up to 196% of the Federal Poverty Level (FPL) that have been assessed as needing treatment for a substance use disorder by a qualified physician, licensed medical provider, qualified addiction professional or licensed mental health professional as needing SUD treatment during the sixty (60) day post-partum eligibility period.

**Expenditures for limited benefit package for the population eligible for services under the Demonstration.** Expenditures for coverage of SUD and mental health services for women who have been diagnosed with an SUD and have been assessed by a qualified physician, licensed medical provider, qualified addiction professional or licensed mental health professional as needing SUD treatment within the sixty (60) day post-partum eligibility period for the duration of eligibility under the Demonstration.

**Enrollment Projections and Expenditures**

MHD does not anticipate any change in enrollment if the demonstration is implemented as proposed, as participants are not locked out from receiving benefits for non-compliance with treatment adherence.

Historical Data					
	Year 1	Year 2	Year 3	Year 4	Year 5
Estimated Member Months	7,374	6,035	6,274	6,743	8,701
PMPM Cost	361.11	412.62	482.46	485.30	492.22
Total Expenditures	2,662,797	2,490,151	3,026,941	3,272,408	4,282,801

Demonstration Period					
	Year 1	Year 2	Year 3	Year 4	Year 5
Estimated Member Months	9,068	9,451	9,850	10,265	10,699
PMPM Cost	531.84	576.65	620.91	670.89	724.90
Total Expenditures	4,822,822	5,430,936	6,115,768	6,886,916	7,755,372

## **Public Review and Comment Process**

The complete version of the updated draft of the Demonstration application is available for public review at <https://dss.mo.gov/mhd/alerts~public-notice.htm>.

The public is invited to review and comment on the State's proposed Demonstration request. Written comments may be sent by regular mail, express or overnight mail, in person or by courier within thirty days after publication of this notice and must be sent or delivered to the following address:

MO HealthNet Division  
615 Howerton Court, 2<sup>nd</sup> Floor  
Jefferson City, MO 65109  
Attn: Terri Woodward

Comments may also be emailed to [Ask.MHD@dss.mo.gov](mailto:Ask.MHD@dss.mo.gov). Please use "Public Comment for Targeted Benefits for Pregnant Women" in the subject line.