

**Public Notice**  
**SUD IMD 1115 Waiver**  
**June 10, 2022**

In accordance with 42 CFR §431.408, the Missouri Department of Social Services (DSS), MO HealthNet Division is providing public notice of its intent to submit to the Centers for Medicare and Medicaid Services (CMS), an 1115 Demonstration application. The complete waiver application is available on the MO HealthNet website under Alerts and Public Notices at <http://dss.mo.gov/mhd/>.

**Waiver Description & Goals**

Through this demonstration waiver application (Demonstration), the State of Missouri (State) is seeking authority to reimburse for medically necessary residential substance use disorder (SUD) services furnished in facilities that qualify as an institution for mental disease (IMD). This Demonstration is part of the State's broader efforts to ensure access to a comprehensive continuum of SUD treatment services. Like states across the nation, Missouri is facing an opioid public health crisis. The Missouri Department of Mental Health (DMH) in partnership with the Missouri Department of Social Services (DSS), MO HealthNet Division (MHD) have focused on a series of initiatives to address the opioid crisis by increasing access to treatment, reducing unmet treatment needs and reducing opioid overdose related deaths through the provision of prevention, treatment and recovery activities. This waiver will complement these efforts by expanding the treatment settings in which Medicaid reimbursement is available.

The proposed effective date of the waiver is October 1, 2022, pending CMS approval.

MO HealthNet seeks to achieve the following goals through implementation of this waiver:

1. Increased rates of identification, initiation, and engagement in treatment;
2. Increased adherence to and retention in treatment;
3. Reductions in overdose deaths, particularly those due to opioids;
4. Reduced utilization of emergency departments and inpatient hospital settings for treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services;
5. Fewer readmissions to the same or higher level of care where the readmission is preventable or medically inappropriate; and
6. Improved access to care for physical health conditions among beneficiaries.

**Eligibility**

All Medicaid enrollees, ages 12-64, eligible for full Medicaid benefits, and requiring a residential level of care for SUD treatment services, would be eligible for short terms stays in an IMD under this waiver.

**Enrollment & Fiscal Projections**

The waiver amendment will have no impact on annual Medicaid enrollment. Further, it is expected to be budget neutral.

**Hypotheses & Evaluation**

MO HealthNet proposes the following evaluation plan, which has been developed in alignment with CMS evaluation design guidance for SMI 1115 demonstrations. The State will contract with an independent evaluator to conduct this review.

- **Hypothesis 1.** The Demonstration will increase the percentage of beneficiaries who are referred and engage in treatment for OUD and other SUDs.
- **Hypothesis 2.** The Demonstration will increase the percentage of beneficiaries who adhere to treatment of OUD and other SUDs.
- **Hypothesis 3.** The Demonstration will decrease the rate of emergency department and inpatient visits within the beneficiary population for SUD.
- **Hypothesis 4.** The Demonstration will increase the percentage of beneficiaries with SUD who experience care for comorbid conditions.

- **Hypothesis 5.** Among beneficiaries receiving care for SUD, the Demonstration will reduce readmissions to SUD treatment.
- **Hypothesis 6.** The Demonstration will decrease the rate of overdose deaths due to opioids.

### **Waiver and Expenditure Authority**

MO HealthNet is requesting expenditure authority under Section 1115 for otherwise covered services furnished to otherwise eligible individuals for short term stays for medically necessary residential substance use disorder (SUD) services furnished in facilities that qualify as an institution for mental disease (IMD).

### **Public Hearings**

MO HealthNet will host two hearings at which the public may provide comments.

The first public hearing will be held **June 15, 2022** from 10:30 a.m. to 12:00 p.m. CST. The WebEx number is **1-650-479-3207**; Access Code: **2469 998 1498**; Meeting Password: **B5SmXTJpd87**

The second public hearing will be held **June 21, 2022**, from 3:00 p.m. to 4:30 p.m. CST. The WebEx number is **1-650-479-3207**; Access Code: **2459 253 0145**; Meeting Password: **5jrCbmNPC84**

The state will take verbal comments at the public hearings.

### **Written Public Comments**

MO HealthNet will also accept written public comments until 5:00 p.m. on July 11, 2022. Written comments may be mailed to:

MO HealthNet Division  
PO Box 6500  
Jefferson City, MO 65102-6500  
Attn: MO HealthNet Director

Additionally, written comments may be sent via email to: [Ask.MHD@dss.mo.gov](mailto:Ask.MHD@dss.mo.gov). Please add “SUD IMD Waiver” in the subject line.