

Public Notice

The Missouri Department of Social Services (DSS) is providing public notice of its intent to submit to the Centers for Medicare and Medicaid Services (CMS) a written application to request approval of a Section 1115 Research and Demonstration waiver and to hold public hearings to receive comments on this proposal. We are providing this notice pursuant to CMS requirements in Title 42, Section 431.408, Code of Federal Regulations.

DSS, through its MO HealthNet Division and in partnership with the Missouri Department of Mental Health (DMH), is seeking a five-year Medicaid Section 1115 Research and Demonstration waiver (hereinafter “demonstration” or “demonstration application”) for the Mental Health Crisis Prevention Project which is designed to provide early intervention, treatment and community support services to Missourians aged 21 to 35 who are identified through a behavioral health crisis. The overall goal of this demonstration is to identify young adults in crises, extend Medicaid eligibility with a targeted benefit package, and engage individuals in services that start them on the path to recovery.

Program Description and Goals

The proposed demonstration builds upon two successful programs implemented as part of Governor Nixon’s Strengthening Missouri’s Mental Health System Initiative. These programs – the Community Mental Health Liaison program and the Emergency Room Enhancement program – identify young adults who are experiencing a behavioral health crisis and link them to health care and behavioral health services. Under the proposed demonstration, individuals identified through these programs will have far greater access to integrated medical and behavioral health services, including evidence-based supported employment services. More specifically, the goals of the demonstration are to:

- Improve access to health care for a segment of the uninsured population in Missouri who have significant medical and behavioral health needs;
- Improve the physical and behavioral health outcomes of demonstration participants, thereby delaying or reversing the progression toward disability; and
- Improve the education and employment outcomes of demonstration participants by creating a pathway toward independence.

Once approved, the demonstration will be statewide and will operate for a period of five years. Missouri proposes to implement July 1, 2016, and operate the waiver through June 30, 2021, or until Missouri implements a broader expansion of Medicaid that would otherwise make this population of adults eligible for coverage under the State Plan.

Beneficiaries and Eligibility Criteria

For this demonstration, Missouri proposes to target individuals who meet the following eligibility parameters. Individuals must meet all of the requirements outlined below to be eligible for the demonstration:

- Referred through the Community Mental Health Liaison (CMHL) or the Emergency Room Enhancement Program (ERE) with a serious behavioral health crisis;
- Determined to have and need treatment for a serious mental illness (SMI) and/or substance use disorder (SUD) as defined by the Department of Mental Health;
- At the time of application, need for treatment requires a total Daily Living Activities (DLA) GAF/mGAF score of 50 or below for both serious mental illness and/or substance use disorder;
- Adult ages 21 to 35 years old;
- U.S. Citizen or eligible qualified legal immigrant;
- Not eligible for any state or federal full benefits program including: Medicaid, Children’s Health Insurance Program (CHIP), or Medicare;
- Resident of Missouri;
- Gross income of the individual that is at or below 150% of the Federal Poverty Level (FPL);
- Uninsured; and
- Not residing in a long term care facility, mental health facility, long-stay hospital, intermediate care facility for persons with developmental disabilities, or penal institution.

Benefit Package, Delivery System and Cost Sharing

Missouri is proposing a targeted package of behavioral health and physical health services targeted to young adults with SMI and/or SUD. The proposed benefit package was designed with input from key stakeholders and knowledgeable experts and includes services that best support effective treatment and early intervention for the target population. The services include selected outpatient, non-emergency department based physical and dental health care benefits¹ and a comprehensive set of outpatient, non-residential behavioral health care benefits. Supported employment that includes job development and job coaching is a new service being proposed under the waiver that is designed to move people into education or employment in order to create stable foundations for ongoing recovery, a pathway toward independence, and a path *away* from future disability.

Services will be provided through a fee-for-service delivery system. Cost sharing requirements are no different from those under the Medicaid State Plan.

Anticipated Enrollment and Expenditures

Missouri anticipates that approximately 1,000 individuals can be served at any point in time during the demonstration. Projections of the duration individuals will remain in the waiver indicate that approximately 1,900 individuals can be served over the five year course of the demonstration. To the extent additional state funding becomes available, the state may be able to expand enrollment.

Below is the projected enrollment and expenditures for the five year demonstration.

¹ Inclusion of dental benefits is pending approval of SPA #16-01, submitted January 6, 2016, anticipated effective date January 1, 2016.

1115 Waiver Population	SFY 2017 (7/1/16 - 6/30/17)	SFY 2018 (7/1/17 - 6/30/18)	SFY 2019 (7/1/18 - 6/30/19)	SFY 2020 (7/1/19 - 6/30/20)	SFY 2021 (7/1/20 - 6/30/21)	Average Trend SFY 2017 - SFY 2021
Demonstration Population Enrollment (Enrollees)	1,000	1,000	1,000	1,000	1,000	0.0%
Demonstration Population Expenditures	\$ 12,628,628	\$ 12,162,969	\$ 12,536,136	\$ 13,450,884	\$ 14,302,181	3.2%

Hypotheses and Evaluation of the Mental Health Crisis Prevention Project

The demonstration will test the following hypotheses:

- Early intervention with young adults experiencing a behavioral health crisis, including enrollment for a minimum of one year in an evidence-based program of health coverage that coordinates primary and behavioral health care, will result in fewer Emergency Department (ED) visits for participants.
- Early intervention with young adults experiencing a behavioral health crisis, including enrollment for a minimum of one year in an evidence-based program of health coverage that coordinates primary and behavioral health care, will result in fewer Social Security disability determinations, which often lead to full Medicaid eligibility.
- Early intervention with young adults experiencing a behavioral health crisis, including enrollment for a minimum of one year in an evidence-based program of health coverage that coordinates primary and behavioral health care, will increase the likelihood of maintaining or gaining competitive integrative employment.
- Early intervention with young adults experiencing a behavioral health crisis, including enrollment for a minimum of one year in an evidence-based program of health coverage that coordinates primary and behavioral health care, will reduce arrests by law enforcement.
- Early intervention with young adults experiencing a behavioral health crisis, including enrollment for a minimum of one year in an evidenced-based program of health coverage that coordinates primary and behavioral health care, will increase the likelihood of stable housing.
- Early intervention with young adults experiencing a behavioral health crisis, including enrollment for a minimum of one year in an evidenced-based program of health coverage that coordinates primary and behavioral health care, will increase the likelihood of remaining in school or finding and participating in an academic program of choice.

These hypotheses will be evaluated by measuring the ED visit rate, Social Security Disability Determination rate, employment rate, arrest rate, private resident living rate/homeless rate, and the rate of involvement in academic programs for demonstration participants.

Waiver and Expenditure Authorities

Missouri requests, under the authority of Section 1115(a)(2) of the Social Security Act, that expenditures made by Missouri 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's title XIX plan.

Expenditures for a targeted benefit package for the population eligible for services under the demonstration. Expenditures for coverage of health care services for individuals aged 21 through 35, with income up to and including 150 percent of the FPL, who have been identified through the state's Emergency Room Enhancement project or Community Mental Health Liaison Program, who have a serious mental illness and/or substance use disorder as determined by the Department of Mental Health, who have met level of care criteria as determined by the Department of Mental Health, but who are otherwise ineligible for Medicaid based on income.

To the extent necessary to implement the proposal, the demonstration application requests that CMS, under the authority of section 1115(a)(1) of the Social Security Act (42 USC 1315), waive the following requirements of Title XIX of the Social Security Act (42 USA 1396) to enable the State of Missouri to implement the Mental Health Crisis Prevention Project.

Amount, Duration, and Scope of Services

Section 1902(a)(10)(B)

To the extent necessary to enable the state to offer a reduced/modified benefit to populations eligible under the demonstration.

Reasonable Promptness

Section 1902(a)(8)

To enable the state to modify eligibility thresholds in order to maintain enrollment up to the limit established in budget neutrality.

Methods of Administration – Transportation

Section 1902(a)(4) insofar as it incorporates 42 CFR 431.53

To allow the state, to the extent necessary, to not provide non-emergency transportation to and from providers for participants.

Comparability

Section 1902(a)(17)

To the extent necessary to enable the state to vary income requirements and impose clinical eligibility criteria for individuals to which they otherwise would not be subject under the state plan.

Public Notice and Input

The complete draft of the demonstration application is available for public review at <http://dss.mo.gov/mhd/>. The public may also request a copy of the application by calling the DMH Division of Behavioral Health at 573-751-9499. Written comments postmarked on or before March 25, 2016 or email submitted until midnight on March 25, 2016 will be accepted. Comments may be sent to the following address:

MO HealthNet Division
P.O. Box 6500
Jefferson City, MO 65102-6500
Attn: MO HealthNet Director
Email: Ask.MHD@dss.mo.gov

The State will host six public hearings during which the public is invited to comment on the 1115 demonstration for the Mental Health Crisis Prevention Project application. To ensure statewide accessibility, the public hearings are being held in different geographic locations around the state and each hearing will also allow telephonic participation by the public. The schedule for the public hearings is:

March 10, 2016, 3:00-5:00 p.m.
Mark Twain Behavioral Health
917 Broadway
Hannibal, MO 63401
Public may call 1-866-906-9888, PIN# 9841665 for teleconference

March 11, 2016, 9:00-11:00 a.m.
Community Counseling Center
402 S. Silver Springs Road
Cape Girardeau, MO 63703
Public may call 1-866-906-9888, PIN# 9841665 for teleconference

March 11, 2016, 2:00-4:00 p.m.
BJC Behavioral Health
BJC Learning Institute, LL Conference Room C
8300 Eager Road
St. Louis MO 63144
Public may call 1-866-906-9888, PIN# 9841665 for teleconference

March 17, 2016, 2:00-4:00 p.m.
Missouri Coalition for Community Behavioral Healthcare
221 Metro Drive
Jefferson City, MO 65109
Public may call 1-866-906-9888, PIN# 9841665 for teleconference

March 18, 2016, 9:00-11:00 a.m.
Burrell Behavioral Health
1300 E. Bradford Parkway
Springfield, MO 65804
Public may call 1-866-906-9888, PIN# 9841665 for teleconference

March 18, 2016, 3:00-5:00 p.m.
ReDiscover
901 NE Independence Ave.

Lee's Summit, MO 64086

Public may call 1-866-906-9888, PIN# 9841665 for teleconference

Verbal or written comments will be accepted at the public hearings. Complete copies of the 1115 Waiver Demonstration for the Mental Health Crisis Prevention Project application will be available at the public hearings. The outcome of this process and the input provided will be summarized for CMS upon submission of the demonstration application. The summary of comments will be posted for public viewing at <http://dss.mo.gov/mhd/> along with the waiver application when it is submitted to CMS.