

Federal Compliance Section Updates

- High Priority HSW Recertification
 - High Priority with the possibility of beneficiaries not being eligible and could be disenrolled/made ineligible if not received on time with all the required information needed. Could also raise concerns from CMS if we have a significant decrease in compliance with these federal obligations in our annual 372
 - BHDDA is struggling to process re-certification due to a variety of missing information (i.e. dates, signatures, IPOS goals, etc.) Each time it is sent back it delays the process even further and jeopardizes eligibility, services, and payment.
- 1115/1915(i)-See attached fact sheet, webinar, and FAQ
 - Following CMS's guidance, Michigan will transition all of the specialty behavioral health services and supports currently covered under 1915(b)(3) authority to a 1115 Demonstration and 1915(i) HCBS state plan benefit effective October 1, 2019.
 - CMS has granted MDHHS/BHDDA time for process change through established milestones to complete all evaluations and re-evaluations of beneficiaries enrolled in and/or seeking 1915(i) HCBS state plan service benefits by October 1, 2022.
 - At that time MDHHS/BHDDA will determine 1915(i)SPA eligibility and the PIHP provider network will be responsible for perform face-to-face assessments, compile required documentation, and submit findings to the MDHHS/BHDDA. The MDHHS/BHDDA will make the determination of needs-based criteria through an independent evaluation and re-evaluation
 - BHDDA: Provided iSPA fact sheets, 9/18/19 informational webinar, related resources, and frequently asked questions for the field
- Update on 2020 Waiver Changes
 - Peer Supports/Peer Integrated Services moved to the State Plan. CMS approved
 - Supports Coordination Services moved to the State Plan under targeted case management. CMS pending
 - Adds Supports Coordinator, Supports Coordinator Assistants, Independent Services & Supports Brokers
- Code Forecast
 - Overnight Health and Safety = T2027/15 minute units
 - Non-Family Training = S5116/encounter covered under HSW, SEDW, CWP
- Medicaid Provider Manual Changes
 - Initial policy promulgation will be done on the 1915(i) State plan benefit and the renewals of the 1915(c)'s added service of Overnight Health and Safety Supports (OHSS).
- In December of 2018 MDHHS put out a document to forecast clarifications to Supported Employment and Housing Assistance. What if any tweaks or additional clarifications to these services will be implemented in response to the newly approved waiver?
 - Supported Integrated Employment: Minor language and reorganization, but the focus of competitive and integrated is the same.
 - Overnight Health and Safety Services: Additional language added per the OHSS stakeholder workgroup
 - See September Update to Waiver Service Information for additional details.
 - No changes for Housing Assistance Services



Behavioral Health & Developmental Disabilities Administration

Quality Management & Planning Division

Background: Michigan asked CMS to consolidate its 1915 (b/b3)/(c) waivers into one 1115 for integrated behavioral and mental health specialty services. CMS is guiding Michigan to continue the pursuit of the 1115, keep all three of the 1915 (c) waivers, amend the current state plan, and add an additional 1915 (i) SPA for the rest of the 1915(b)(3) services.

Authority	Habilitation Supports Waiver 1915(c)	Managed Specialty Services and Supports Waiver 1915(b), 1915(b)(3) and EPSDT	Children’s Waiver 1915(c)	Waiver for Children with Serious Emotional Disturbance (SEDW) 1915(c)	Autism Benefit EPSDT
Services	<ul style="list-style-type: none"> Community Living Supports Enhanced Pharmacy Enhanced Medical Equipment & Supplies Environmental Modifications Family training Goods and Services Out-of-Home Non-vocational Habilitation Personal Emergency Response System (PERS) Prevocational Services Private Duty Nursing Respite Care Supports Coordination Supported Employment 	<p><u>Covered Services 1915(b)</u> include Assertive Community Treatment, Assessments, Behavioral Management Review, Child Therapy, Clubhouse Psychosocial Rehabilitation, Crisis Intervention & Residential, Family Therapy, Health Services, Home-Based Services, Individual & Group Therapy, Inpatient Psych Hospitalization, Intensive Crisis Stabilization, Medication Administration/Review, Nursing Facility MH Monitoring, OT, PT, Speech, Personal Care in Specialized Homes, Substance Abuse, Targeted Case Management, Telemedicine, Transportation, Treatment Planning, Wraparound</p> <p><u>Additional 1915(b)(3) Services</u> include Assistive Technology, Community Living Supports*, Enhanced Pharmacy, Environmental Modifications, Family Support & Training*, Fiscal Intermediary, Housing Assistance, Peer-delivered or -operated services, Prevention Direct Service Models*, Respite, Skill-Building*, Support Coordination*, Supported / Integrated Employment*</p>	<ul style="list-style-type: none"> Community Living Supports Enhanced Transportation Home Care Training, Family Home Care Training, Non-family Specialty Services Respite Specialized Medical Equipment & Supplies & Environmental Accessibility Adaptations (EAA) 	<ul style="list-style-type: none"> Community Living Supports Family Support & Training Family Home Care Training Home Care Training, Non-family Respite Care Child Therapeutic Foster Care Therapeutic Activities Therapeutic Overnight Camp Community Transition Services Wraparound Services 	<ul style="list-style-type: none"> Applied Behavior Analysis

Figure 1. Michigan Medicaid Program: **CURRENT** PIHP/CMHSP Behavioral Health Service Provision and Authorities ***Services in bold italics** are provided under the authority of EPSDT for children birth to 21 years and provided under the authority of §1915(b)(3) of the Social Security Act for adults 21 years and older.

Figure 2. Michigan Medicaid Program: **Proposed FY20** PIHP/CMHSP Behavioral Health Managed Care Service Provision and Authorities

Authority	Behavioral Health 1115 Waiver	Behavioral Health Covered EPSDT	Behavioral Health Covered State Plan	Children's Waiver 1915(c)	SED Waiver 1915(c)	Habilitation Supports Waiver 1915(c)	1915 (i) SPA
Services	<ul style="list-style-type: none"> PIHP Managed Care Authority SUD Services 	<ul style="list-style-type: none"> ABA Community Living Supports Family Support & training Peer Delivered or operated services Prevention Direct Service Models Skill Building Supported/integrated Employment Supports Coordination Wraparound 	<ul style="list-style-type: none"> Assertive Community Training Assessments Behavior Treatment Review Child Therapy Clubhouse Psychosocial Rehabilitation Crisis Intervention & Residential Family Therapy Health Services Individual & Group Therapy Inpatient Psych Hospitalization Intensive Crisis Stabilization Medication Admin/Review Nursing Facility MH Monitoring OT, PT, Speech Peer-delivered or -operated services Personal Care in Specialized Homes Supports Coordination Targeted Case Management Telemedicine Transportation Treatment Planning 	<ul style="list-style-type: none"> Community Living Supports Enhanced Transportation Environmental Accessibility Adaptations (EAA) Family Support & Training Fiscal Intermediary Non-family training Respite Specialized Medical Equipment & Supplies Specialty Services <p>NEW</p> <ul style="list-style-type: none"> Overnight Health and Safety Support 	<ul style="list-style-type: none"> Community Living Supports Child Therapeutic Foster Care Family Support & Training Non-family training Therapeutic Activities Therapeutic Overnight Camp Community Transition Services Respite Wraparound <p>NEW</p> <ul style="list-style-type: none"> Fiscal Intermediary Overnight Health and Safety Support 	<ul style="list-style-type: none"> Community Living Supports Enhanced Medical Equipment & Supplies Enhanced Pharmacy Environmental Modifications Family Support & Training Goods and Services Out-of-home non-vocational habilitation Personal Emergency Response System (PERS) Prevocational Services Private Duty Nursing Respite Supported/Integrated Employment <p>NEW</p> <ul style="list-style-type: none"> Fiscal intermediary Non-family Training Overnight Health and Safety Support 	<ol style="list-style-type: none"> Community Living Supports Enhanced Pharmacy Environmental Modifications Family Support & Training Fiscal Intermediary Housing Assistance Specialized Medical Equipment & Supplies (Assistive Tech) Respite Skill Building Supported/Integrated Employment Vehicle Modification (Assistive Tech)

*ICF/IID = Intermediate Care Facility for Individuals with Intellectual Disabilities