

WASP SECTION 1115 DEMONSTRATION

Public Hearing

September 15, 2023 – 1:00pm to 3:00pm



DEPARTMENT OF
**PUBLIC HEALTH &
HUMAN SERVICES**

Welcome And Zoom Logistics

Zoom Overview

- Participants are joining in person, by computer and phone
- Everyone will be **automatically muted** upon entry

Closed Captioning

- Live closed captioning is available – you can click the CC box at the bottom of the Zoom box

Submitting Public Comments

- **Chat Function.**
 - Use the chat function to submit questions and public comments
 - All information and questions received through the chat function will be recorded as public comments
- **Spoken.**
 - Telephone and computer participants will have the opportunity to submit public comments in the last half of the webinar (more details will be shared about how to “raise your hand” & “unmute” yourself at that time)



Objectives Of Today's Public Hearing

- Provide an overview of the Waiver for Additional Services and Populations (WASP) Section 1115 Demonstration Waiver;
- Review the WASP Section 1115 Waiver Amendment Request; and
- Provide an opportunity to submit public comments.

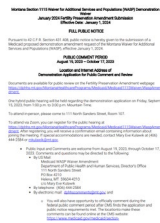


Accessing Montana WASP Materials

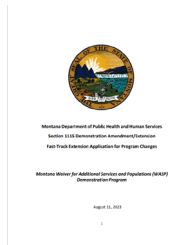
Information on Montana WASP Waiver can be found on the DPHHS web page:
<https://dphhs.mt.gov/montanahealthcareprograms/medicaid/Medicaid1115Waiver/WaspAmendment>



This Presentation



The Public Notice



The Montana WASP Waiver Application

Submitting Public Comment

The WASP Waiver public comment period is currently ongoing.
To be considered prior to CMS submission, public comments must be received by 11:59 pm MT on
October 17, 2023.

Mail. Indicate “Medicaid WASP Waiver” in the address line
Department of Public Health and Human Services
Director’s Office
PO Box 4210
Helena, MT 59604-4210

Email. Indicate “Medicaid WASP Waiver” in email’s subject line
dphhscomments@mt.gov

Today’s Public Hearing.

Chat Function. All information and questions received through the chat function will be recorded as public comments.

Spoken. Participants will have the opportunity to submit public comments in the last half of the webinar.



Agenda

1. 1115 Waiver Overview
2. WASP
3. Proposed Waiver Amendment Request For WASP
4. Waiver Evaluation
5. Timeline and Submission Of Public Comment



1115 Waiver Overview



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Background On Section 1115 Waiver Authority

- Under Section 1115 Demonstration Waivers, States can request authority to waive almost any Medicaid state plan requirement, allowing states to cover services and/or populations not included in the Medicaid state plan.
- Without a waiver, federal financial participation would not be available for these types of services.
- States must provide a public process for notice and comment on proposed demonstration applications and extensions.



Section 1115 Waiver Authority Requirements

An 1115 Waiver must be:

- ✓ An experimental, pilot or demonstration project;
- ✓ Likely to assist in promoting the objectives of the Medicaid program;
- ✓ Budget neutral to the federal government; and
- ✓ Limited in duration to the extent and period necessary to carry out the demonstration.

Source: Social Security Act (SSA) § 1115.



Waiver For Additional Services And Populations (WASP)



Summary Of Montana's Current WASP Demonstration

- The WASP is a Montana Medicaid Waiver Program that provides supplementary Montana Medicaid services to two separate populations who would otherwise not qualify for the fuller level of service.
- The WASP currently offers Standard Medicaid benefits to the Mental Health Services Plan (MHSP) individuals age 18 or older with Severe Disabling Mental Illness (SDMI) who are otherwise ineligible for Medicaid benefits and either:
 - Have income 0-138% of the Federal Poverty Level (FPL) and are eligible for or are enrolled in Medicare; or
 - Have income 139-150% of the FPL regardless of Medicare eligibility or enrollment status.
- The WASP provides for 12 months continuous coverage for the MHSP population and is limited to 3,000 members at one time.



Summary Of Montana's Current WASP Demonstration Continued

- The Aged, Blind or Disabled (ABD) population are individuals determined categorically eligible for Medicaid based on their age, blindness and/or disability.
 - This population receives a single limited benefit under WASP in addition to their Standard Medicaid benefit. ABD eligible members can receive dental treatment services above the \$1,125 State Plan dental treatment cap.
 - There is no membership limit for this population.
- The WASP Demonstration was extended by CMS in 2022 and is now effective January 1, 2022, through December 31, 2027.



Proposed Waiver Amendment For WASP



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Status Update On The Addition Of Fertility Preservation Services

- During the 2023 Montana Legislative Session, Senate Bill 516 “Provide for the preserving Fertility Act” was passed and signed into law by Governor Gianforte.
- This legislation requires DPHHS to add Medicaid and Healthy Montana Kids (HMK) coverage for fertility preservation services for aged-eligible individuals diagnosed with cancer and the standard of care involves medical treatment that may directly or indirectly cause infertility.
- DPHHS plans to submit an amendment to the WASP to add the fertility preservation services to Medicaid and HMK eligible populations.



Eligible Populations

- Fertility preservation services included under this Demonstration Amendment are available to Medicaid and HMK eligible individuals who are:
 - diagnosed by a physician as having an active cancer diagnosis requiring treatment that may cause a substantial risk of sterility or infertility; and
 - between the ages of 12 and 35.
- Medicaid and HMK members will qualify for fertility preservation services outlined in this Demonstration based upon their medical need for services.



Benefits

- Qualified Medicaid and HMK members will be eligible to receive the following services:
 - Collection of eggs and sperm consistent with established medical practices or professional guidelines published by the American Society of Reproductive Medicine or the American Society of Clinical Oncology.
- The State does not propose any additional benefit changes to the Medicaid or HMK/CHIP benefit plans under the WASP.



Cost Sharing

- Cost sharing/copayment will not be required for Medicaid fertility preservation services.
- Montana does not require cost sharing or copayments for any Medicaid covered service.
- Individuals enrolled in HMK will be assessed copayments for fertility preservation services in line with the current approved HMK state plan.
- Fertility preservation services are subject to annual deductibles and copayment provisions as applicable to hospital, medical, or surgical services covered under the state plan.



Delivery System

- The State does not propose any changes to the Medicaid health care delivery system.
- The new fertility preservation services for the demonstration individuals will be provided through the current fee for service (FFS) reimbursement system. All Medicaid enrollees will continue to receive services through their current delivery system in the same manner under the state's current Medicaid state plan.
- The State does not propose any changes to the HMK health care delivery system. Fertility preservation services will be provided through the current Third Party Administrator (TPA) fee for service contract. All HMK enrollees will continue to receive services through their current delivery system in the same manner under the state's current state plan.



Enrollment Projections And Annual Expenditures

- DPHHS developed projections for the demonstration period based on state historical expenditures, as available, as well as anticipated cost and utilization trends. Below are the projected enrollment and expenditures for the remaining demonstration years:

	DY21 (2024)	DY22 (2025)	DY23 (2026)	DY24 (2027)
Medicaid Enrollment	15	15	16	16
Medicaid Expenditures	121,838	125,493	137,875	142,012
Expansion Enrollment	21	21	22	23
Expansion Expenditures	170,574	175,691	189,579	204,142
CHIP Enrollment	1	1	1	1
CHIP Expenditures	8,123	8,366	8,617	8,876

The projected fertility preservation enrollment and expenditures result in an estimated fiscal impact of \$1,301,185 for the remaining 4 demonstration years.

Goals And Objectives

- Under Section 1115 of the Social Security Act, States may implement “experimental, pilot or demonstration projects which, in the judgment of the Secretary [of Health and Human Services] is likely to assist in promoting the objectives of [Medicaid]”.
- The State believes this demonstration is likely to promote the objectives of Medicaid by improving participant health outcomes and quality of life.
- Providing these services will make it possible for Medicaid and HMK eligible individuals who have been diagnosed with a form of cancer, and whose related treatment may cause a substantial risk of sterility or iatrogenic infertility (including surgery, radiation, or chemotherapy) to receive coverage for fertility preservation services.



Legal Authorities

- Montana is requesting expenditure authority under Section 1115 to provide fertility preservation services for Medicaid and HMK eligible individuals between the age of 12 and 35 with an active diagnosis of cancer where the treatment would put them at risk for infertility.
- The requested expenditure authority promotes the objectives of Title XIX by improving health outcomes for Medicaid and HMK populations.
- This amendment request does not propose any additional waiver and expenditure authority changes to the WASP Demonstration Program beyond what is in the extension/renewal for the Section 1115 WASP approved on November 21, 2022.



Waiver Evaluation



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Evaluation And Monitoring

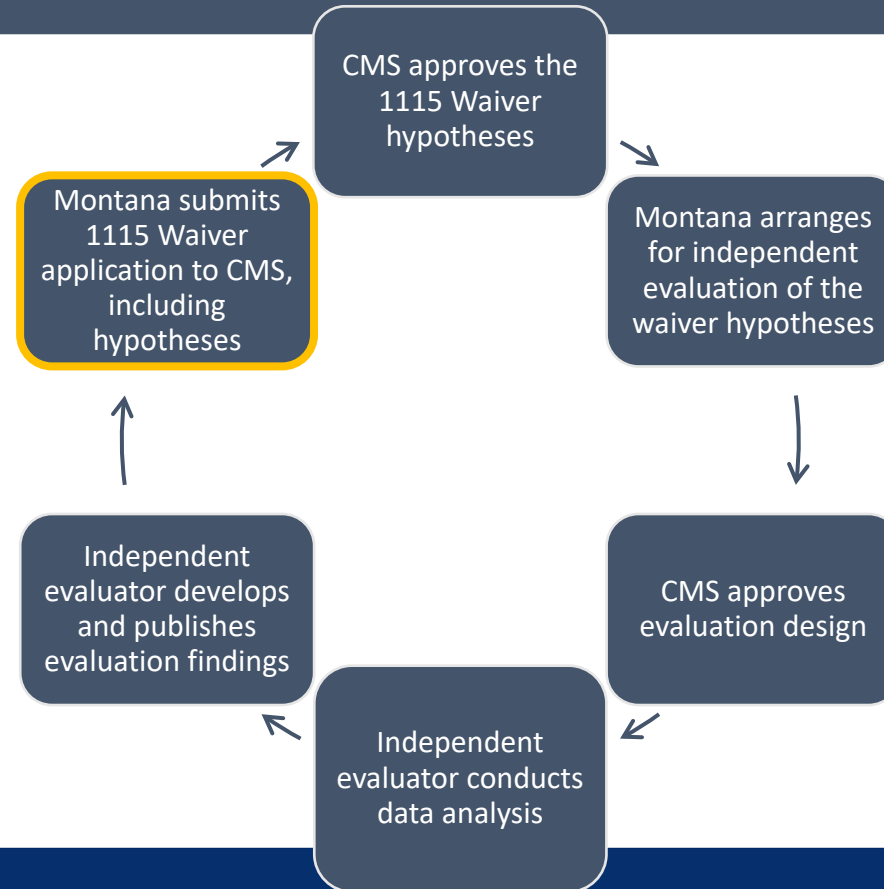
- DPHHS will identify validated performance measures that adequately assess the impact of the fertility preservation amendment on Medicaid and HMK individuals.
- Submit a revised evaluation design to CMS for approval.
- Conduct ongoing monitoring of this demonstration and provide information regarding monitoring activities in the required monitoring reports.
- The following hypothesis will be tested during the remaining demonstration years.

Hypothesis	Anticipated Measure(s)	Data Sources	Evaluation Approach
This demonstration will allow individuals who are at risk for infertility due to cancer treatment to preserve their ability to have children in the future.	Number of individuals served under this demonstration	MMIS Data Warehouse	Montana will design quantitative and qualitative measures to include quasi-experimental comparisons.



Waiver Evaluation Cycle

For each approved 1115 Waiver, Montana is required to arrange for an independent evaluation of the waiver's objectives and hypotheses that it wants to test.



Timeline And Submission Of Public Comments



Timeline And Next Steps

Milestones	Proposed Timeline
<i>Conduct 60-day State public comment</i>	<i>August 19, 2023 – October 17, 2023</i>
Mail Tribal Consultation Letter	August 17, 2023
Public Hearing	September 15, 2023 (1:00 PM – 3:00 PM MT)
Review public comments and finalize documents for CMS submission	August – October 2023
<i>Submit WASP Waiver Extension</i>	<i>By October 23, 2023</i>
CMS conducts federal 30-day public comment period	October 2023 – November 2023
Negotiations with CMS	November 2023 - December 2023
<i>Effective date of WASP Waiver Extension</i>	<i>January 1, 2024</i>



Ways To Provide Public Comments

Submit public comments by email, regular mail, or in-person until 11:59 pm on October 17, 2023.

A hard copy of the draft waiver extension application and public notice documents are available at the DPHHS Director's Office, 111 North Sanders St, Room 301, Helena, MT.

By Phone	(406) 444-2584
By Email	dphhscomments@mt.gov
By Regular Mail	Medicaid WASP Fertility Preservation Director's Office PO Box 4210 Helena, MT 59604-4210
In Person	Public Hearing



Opportunities To Provide Public Comments

**Public Hearing will be held on
Friday, September 15, 2023
1pm - 3pm Mountain Time**

Registration and additional information can be found on the DPHHS web page:

<https://dphhs.mt.gov/MontanaHealthcarePrograms/Medicaid/Medicaid1115Waiver/WaspAmendment>

- All public comments should be limited to 2 minutes each.
- DPHHS will listen and collect comments.
- All comments will be reviewed and considered equally whether they are received as written or verbal comments.
- DPHHS will provide responses in writing.



Public Comment Process

- **Chat.** All information and questions received through the chat function will be recorded as public comments.
- **Spoken.** Participants must “raise their hand” for Zoom facilitators to unmute the participant to share their public comment.
 - **If you logged on via phone-only**
 - Press “*9” on your phone to “raise your hand.”
 - Listen for your phone number to be called by moderator.
 - After being selected to share your public comment, please ensure you are “unmuted” on your phone by pressing “*6.”
 - **If you logged on via Zoom interface**
 - Press “Raise Hand” icon at the bottom of the screen.
 - After being selected to share your public comment, please ensure you are “unmuted” on your audio.

