



**STATE OF NEW HAMPSHIRE
DEPARTMENT OF HEALTH AND HUMAN SERVICES**

**PUBLIC HEARING FOR:
SUBSTANCE USE DISORDER SERIOUS MENTAL ILLNESS AND SERIOUS EMOTIONAL
DISTURBANCE TREATMENT AND RECOVERY ACCESS SECTION 1115(a)
RESEARCH AND DEMONSTRATION WAIVER**

EXTENSION REQUEST

Public Forums:	August 8, 2022	Concord
	August 10, 2022	Manchester
	August 18, 2022	Littleton

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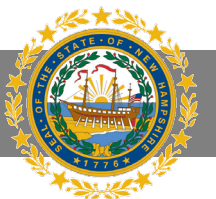
Demonstration History

Initial Substance Use Disorder Treatment and Recovery Access (SUD-TRA) 1115 Demonstration

- This section 1115(a) demonstration waives the IMD exclusion rule for Medicaid beneficiaries under 65 with SUD who need residential or hospital level treatment in exchange for NH accepting certain special terms and conditions
- This Demonstration was intended to enhance substance use disorder treatment supports in New Hampshire
- The SUD-TRA was approved on July 10, 2018, for a five-year term ending June 30, 2023
- Licensed bed capacity for Medicaid-enrolled residential treatment facilities increased from 554 beds at baseline (July 1, 2017 – June 30, 2018) to 697 beds in DY3 (July 1, 2020 – June 30, 2021), an increase in SUD treatment capacity of 25.8%

Serious Mental Illness (SMI) Amendment to the existing SUD-TRA Demonstration 1115 Demonstration

- This amendment expanded the existing SUD-TRA demonstration to include a waiver of the IMD exclusion rule for Medicaid beneficiaries 21-64 with SMI who need residential or hospital level treatment
- This was intended as part of New Hampshire's approach to addressing the increase in Emergency Department boarding and to support the comprehensive, integrated continuum of mental health treatments and care available in the state
- The SMI amendment was approved on June 2, 2022, to coincide with the term of the SUD-TRA ending on June 30, 2023
- Initially New Hampshire Hospital and Hampstead Hospital will be the only providers participating in the SMI component of the demonstration



Overview of Demonstration Authorities

The current Substance Use Disorder Serious Mental Illness Serious Emotional Disturbance Treatment and Recovery Access Section 1115(a) Research and Demonstration Waiver (SUD-SMI-SED-TRA Demonstration) allows New Hampshire to:

- Utilize federal matching funds for Medicaid State Plan services that have historically been carved out of the Medicaid program;
- Expand access to and capacity for behavioral health services; and
- Improve the full continuum of behavioral health care.

Substance Use Disorder



Beneficiaries under age 65 who are otherwise eligible and primarily receiving treatment and withdrawal management services for SUD who are short-term residents in facilities that meet the definition of an institution for mental diseases (IMD)

Serious Mental Illness

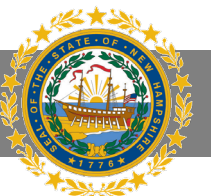


Beneficiaries over age 21 and under age 65 who are otherwise eligible and primarily receiving short-term inpatient psychiatric treatment or short-term residential mental health treatment for serious mental illness (SMI) in an IMD

Community Reentry (Proposed)



Beneficiaries who are otherwise eligible and receiving SUD, SMI or Serious Emotional Disturbance (SED) treatment while an inmate of a public institution within NHDOC's system of state prisons, for a tailored package of care coordination services to be provided during the period 45 days prior to release

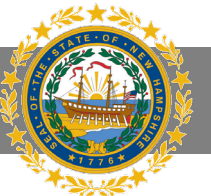


Accomplishments

Since the initial SUD-TRA Demonstration approval in July 2018, NH has made numerous strides in improving behavioral health care. Positive findings from the independent evaluation include:

- ✓ Increased licensed bed capacity for Medicaid-enrolled residential treatment facilities by 25.8% through the end of DY3 (June 30, 2021)
- ✓ Improved access to care for those beneficiaries with intensive SUD treatment needs
- ✓ Decline in Emergency Department use in the 90 days following IMD discharge as compared to the 90 days period prior to admissions
- ✓ Enhanced stabilization and continuity of care post discharge as demonstrated by percent of members who have a claim for SUD treatment in the 45, 90, 135 and 180 days following IMD discharge
- ✓ Actual expenditures through Demonstration in DY3 were \$2,551,780 below the hypothetical cap set by CMS and the state is expected to maintain or reduce spending in comparison to what would have been spent absent the Demonstration

*These accomplishments, and others, are described in greater detail in the Interim Evaluation Report. This report is included as an attachment in the extension request posted online.



Extension Request

Extension of the SUD-SMI Demonstration

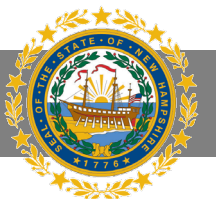
- The Substance Use Disorder Serious Mental Illness Serious Emotional Disturbance Treatment and Recovery Access Section 1115(a) Research and Demonstration Waiver is scheduled to expire on June 30, 2023
- Under 42 CFR § 431.412 (c) Demonstration extension request, the state can request that CMS extend the waiver authority granted for an additional 5-year period
- If CMS approves New Hampshire's extension request, the Demonstration will be active through June 2028



Proposed Changes: Community Reentry

In addition to extending the existing Demonstration authorities, NH DHHS is proposing a new community reentry component:

- Community Reentry aims to create an enhanced care coordination program for Medicaid-eligible individuals with SUD or SMI in the 45 days prior to release from state prisons operated by the Department of Corrections (DOC)
- The key goal of the program would be to connect formerly incarcerated beneficiaries with resources in the community to support a stable reintegration and reduce recidivism
- DHHS has developed Community Reentry in close collaboration with DOC and is including this addition as a requested change to the existing SUD-SMI Demonstration
- The proposed demonstration will be limited to state prisons initially; providing a proof of concept without having to adjust for differences in county jail operating models across NH's 10 counties
- Details are subject to discussion with CMS and may include telehealth consults and / or counseling for incarcerated members with SUD (introductory appointment with community-based MAT provider, peer support) or SMI (introductory appointment with community-based psychiatrist, licensed counselor)- none of which replaces health care provided by the state under its legal obligations
- CMS has not yet approved such a waiver of the “inmate exclusion rule” – a close cousin of the “IMD exclusion rule” – but they plan to issue guidance and consider such requests beginning in 2023
- CMS has indicated that they will consider this change request separately to expedite the rest of the extension pertaining to IMDs



Extension Goals

NH DHHS has outlined the following goals for the Demonstration:

SUD Goals

- Increase rates of identification, initiation, and engagement in treatment for SUD;
- Increase adherence to and retention in treatment;
- Reduce overdose deaths;
- Reduce utilization of emergency departments and inpatient hospital settings for treatment where the utilization is preventable or medically inappropriate;
- Reduce readmissions to the same or higher level of care where the readmission is preventable or medically inappropriate; and
- Improve access to care for physical health conditions

SMI Goals

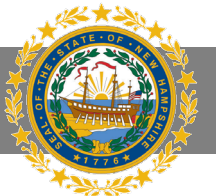
- Reduce utilization and lengths of stay in emergency departments among Medicaid beneficiaries with SMI/SED;
- Reduce preventable readmissions to acute care hospitals and residential settings;
- Improve availability of crisis stabilization services;
- Improve access to community-based services to address the chronic mental health care needs, including through increased integration of primary and behavioral health care; and
- Improve care coordination, especially continuity of care in the community following episodes of acute care in hospitals and residential treatment facilities.

Community Reentry Goals

- Increase time in community following release from incarceration by enhancing care coordination pre-release;
- Reduce parole violations related to SUD and SMI/SED by connecting with community-based providers pre-release
- Reduce recidivism, especially for SUD-related offenses;
- Reduce utilization of IMD services by formerly incarcerated members; and
- Reduce utilization of emergency department and inpatient hospital settings for SUD and SMI/SED through improved access to other continuum of care services.

Existing Demonstration Components

Newly Proposed Component



Budget Neutrality

NH DHHS worked with its actuarial partners at Milliman to project budget neutrality limits for this extension, including both the core demonstration and the newly proposed Community Reentry component. Detailed projections and methodologies are available in the extension request posted online.

Projected Annual Budget Neutrality Expenditures for IMD Demonstration

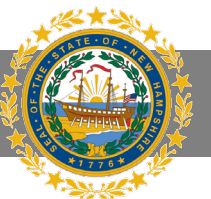
- \$15,420,293 in SFY24 (first year of demonstration extension)
- Achievable based on NH DHHS assessment

Projected Annual Budget Neutrality Expenditures for Community Reentry

- \$212,557 in SFY24
- Figures are subject to change based on final technical specifications as determined in partnership with CMS

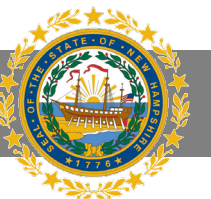
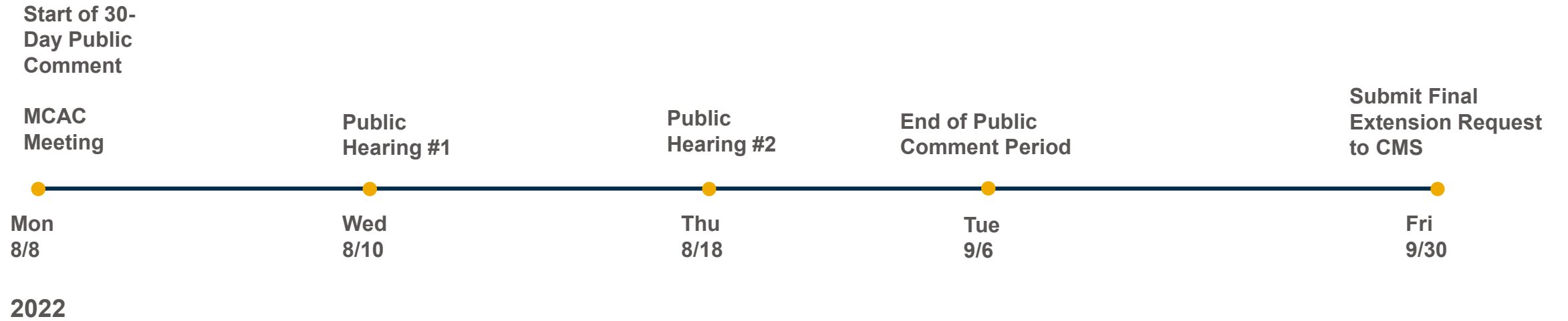
Projected Enrollment and Expenditures by Demonstration Component (SFY24)

	Member Months	Individual Members	Expenditures
SUD IMD Component	5,772	481 (Monthly Avg)	\$6,379,106
SMI IMD Component	990	523 (Annual Avg)	\$9,041,187
Community Reentry Component	869	588	\$212,557



Timeline

The timeline for this extension application is outlined below.



Opportunities for Public Input | Public Hearings

DHHS will offer two opportunities for public hearings and will also include the extension on the upcoming MCAC meeting agenda.

MCAC Meeting

Monday, August 8, 2022 – Concord

10:00 a.m. – 12:00 p.m.

Fred H. Brown Building Auditorium

129 Pleasant Street

Concord, NH 03301

Zoom option: [https://nh-](https://nh-dhhs.zoom.us/j/6960029379?pwd=aCtXbGZUZGgyUHVRWE9RQVc2UEtUZz09)

[dhhs.zoom.us/j/6960029379?pwd=aCtXbGZUZGgyUHVRWE9RQVc2UEtUZz09](https://nh-dhhs.zoom.us/j/6960029379?pwd=aCtXbGZUZGgyUHVRWE9RQVc2UEtUZz09)

Meeting ID: 696 002 9379

Passcode: 454733

Mobile: +13017158592,,6960029379#,,,,*454733#

Public Hearing #1

Wednesday, August 10, 2022 – Manchester

5:30 - 7:00 pm

Manchester Public Library Auditorium

405 Pine Street

Manchester, NH 03104

Zoom option: [https://nh-](https://nh-dhhs.zoom.us/j/88652187407?pwd=NGdGejFVMXIQd243WWw3NUtNZXISdz09)

[dhhs.zoom.us/j/88652187407?pwd=NGdGejFVMXIQd243WWw3NUtNZXISdz09](https://nh-dhhs.zoom.us/j/88652187407?pwd=NGdGejFVMXIQd243WWw3NUtNZXISdz09)

Meeting ID: 886 5218 7407

Passcode: 704376

Mobile: +16465588656,,88652187407#,,,,*704376#

Public Hearing #2

Thursday, August 18, 2022 – Littleton

5:00 - 6:30 pm

Littleton Regional Healthcare

600 St. Johnsbury Road

Littleton, NH 03561

Note: Attendee best entrance will be at the H Taylor Caswell Center / Cafeteria Entrance (next to Urgent Care Unit). Masks are required upon entrance and for the duration of stay inside the facility.

Zoom option: [https://nh-](https://nh-dhhs.zoom.us/j/84904266940?pwd=Sk9tbjVRT29KdE5RRitxOE9qVXh6dz09)

[dhhs.zoom.us/j/84904266940?pwd=Sk9tbjVRT29KdE5RRitxOE9qVXh6dz09](https://nh-dhhs.zoom.us/j/84904266940?pwd=Sk9tbjVRT29KdE5RRitxOE9qVXh6dz09)

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Passcode: 704376

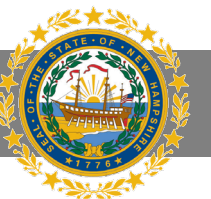
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Opportunities for Public Input | Email or Mail

Public comment can also be sent to the following email and / or physical addresses.

- Email: SUD-SMI.1115.Extension@dhhs.nh.gov
- Mail: Carolyn Richards
NH Department of Health and Human Services
Attn: SUD-SMI-SED-TRA Demonstration Extension
129 Pleasant Street
Concord NH 03301

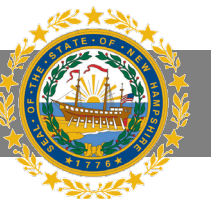


Contact Information

To reach all stakeholders, please use the following contact information:

- Non-electronic copies of all aforementioned documents are available by contacting Carolyn Richards at (603) 271-9439.

Public Comment may be submitted until 5:00 p.m. (Eastern) on Tuesday, September 6, 2022.



Draft Extension Application

The current draft of the extension and other supporting materials can be found online.

- The complete version of the *Substance Use Disorder Serious Mental Illness Serious Emotional Disturbance Treatment and Recovery Access Section 1115(a) Research and Demonstration Waiver Extension Request* is available for public review at: <http://www.dhhs.nh.gov/programs-services/medicaid/medicaid-waivers-and-demonstrations>.
- CMS guidance regarding opportunities to design innovative service delivery systems to support adults and children with substance use disorder can be found at: <http://www.medicare.gov/federal-policy-guidance/downloads/smd17003.pdf>.
- Similar guidance regarding opportunities to support adults and children with serious mental illness and serious emotional disturbance can be found at: <http://www.medicare.gov/federal-policy-guidance/downloads/smd18011.pdf>.
- Subtitle D (*Medicaid Reentry Act / §5032*) of *SUPPORT for Patients and Communities Act* promotes "innovations to ease transitions and integration to the community for [inmates of a public institution]" at <http://www.congress.gov/bill/115th-congress/house-bill/6/text>.
- Other notices, demonstration documents, and information about the demonstration are available on the DHHS website at: <http://www.dhhs.nh.gov>.

