PNMI Statewide Stakeholder Forum

October 18, 2011

http://maine.gov/dhhs/oms/provider/pnmi.html
Agenda

• Welcome – Bonnie Smith 9:00 – 9:05

• Overview – Pam Easton 9:05 – 9:10

• Options, Issues and Intersection with Olmstead – Robin Cooper 9:10 – 10:30

• Maine PNMI Services – Patty Dushuttle 10:30 – 10:50

• Federal Authority – Patty Dushuttle 10:50 – 10:55

• State Plan Amendments – Patty Dushuttle 10:55 – 11:05

• CMS Communications and Concerns – Patty Dushuttle 11:05 – 11:20
• IMD Survey – Patty Dushuttle 11:20-11:30

• Maine’s Limitations / Things to Consider – Pam Easton 11:30-11:40

• Questions & Answers / Next Steps – Pam Easton 11:40-12:00
Welcome
Overview
Options, Issues and Intersection with Olmstead
Maine PNMI Services

Private Non-Medical Institution (PNMI) Services are residential treatment services funded by MaineCare. They:

• Are operated by agencies or facilities

• Are licensed by Maine DHHS

• Provide rehabilitative treatment to four or more residents

• Provide food, shelter, and personal care services

• Require Prior Authorization or assessment

• Render treatment that is medically necessary
Where are PNMI Services Described?

- MaineCare Benefits Manual, Section 97, Chapter II (Coverage)
- Chapter III (Reimbursement)
  - Appendix B: Substance Abuse Facilities
  - Appendix C: Case Mix Facilities
  - Appendix D: Child Care Facilities
  - Appendix E: Community Residences for Persons With Mental Illness
  - Appendix F: Non-Case Mixed Medical and Remedial Facilities
Appendix B: Substance Abuse Facilities

- Programs Overseen by DHHS OSA
- Provide varying levels of substance abuse treatment in residential setting
- Clinical treatment overseen by a treatment team
- Residents must be assessed using American Society of Addiction Medicine, ASAM, Patient Criteria
- Also provide personal care services, supervision, monitoring of health and safety
- Services are reimbursed with a standardized per diem rate
Appendix B: Substance Abuse Facilities

Number of members served in these facilities?

- Adolescent Residential 26
- Consumer Run Residential 14
- Detox 18
- Extended Care 52
- Halfway House 97
- Residential Rehab 57
- Shelter 38

TOTAL: 302

Approximate Numbers as of August, 2011
Appendix C: Case Mix Facilities

- Overseen by DHHS Office of Elder Services

- Services Provided Include:
  - Personal Care Services
  - Supervision
  - Medication Administration
  - Nursing
  - Rehabilitation
  - Coordination of other medical services
  - Room and Board (not MaineCare funds)

- Services are reimbursed with a per diem capitated rate adjusted for case mix (acuity) of residents
(Cont.) Appendix C: Case Mix Facilities

- Residents must be assessed with the Medical Eligibility Determination (MED) tool

- Must meet specific medical eligibility

- Number of members served in these facilities?
  - 4,291 individuals
Appendix D: Child Care Facilities

• Overseen by DHHS Office of Child and Family Services

• Licensed by DHHS

• Provides:
  – Behavioral Health services
  – Medication Administration
  – Rehabilitation
  – Crisis Intervention
  – Personal Care Services
  – Supervision

• Require Prior Authorization and Assessment

• Services reimbursed through a standardized per diem rate
Number of members served in these facilities?

<table>
<thead>
<tr>
<th>Category</th>
<th>Number</th>
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</thead>
<tbody>
<tr>
<td>General Residential</td>
<td>299</td>
</tr>
<tr>
<td>Infant Mental Health</td>
<td>47</td>
</tr>
<tr>
<td>Treatment Foster Care</td>
<td>350</td>
</tr>
</tbody>
</table>

TOTAL: 696

*Numbers Approximate as of August 2011*
Appendix E
Community Residences for Adults with Mental Illness

• Overseen by DHHS Office of Adult Mental Health Services

• Licensed by DHHS

• Services must be Prior Authorized

• Assessment with LOCUS tool required

• Must show Severe and Persistent Mental Illness and a need for residential care

• Services reimbursed through a standardized per diem rate
Appendix E
Community Residences for Adults with Mental Illness

What services are provided?

• Counseling
• Medication Administration, monitoring
• Rehabilitation Services
• Personal Care Services
• Monitoring of Safety

Number of members served in these facilities?

608 Members

*Numbers Approximate as of August, 2011*
Appendix F:
Non-Case Mixed Medical and Remedial Services

- Overseen by DHHS- Office of Elder Services and Office of Adults with Cognitive and Physical Disabilities

- Licensed by DHHS

- Require Prior Authorization

- Require Assessment

- Services reimbursed through a per diem rate
Appendix F: Non-Case Mixed Medical and Remedial

What services are delivered?

• Habilitation
• Personal Care Services
• Monitoring for Safety
• Medication Administration

Number of members served in these facilities?

- Brain Injury 125
- Elder Services 44
- Intellectual Disability 210

TOTAL: 379

Numbers Approximate as of August 2011
Maine’s State Plan

- Maine’s State Plan
  - Coverage of PNMI
    - Personal Care Services
    - Rehabilitative Services
  - Reimbursement of PNMI
    - Payment is made under contracts based on capitation rates
Maine’s State Plan

• Preparation for MIHMS- Necessitated approximately 10 State Plan Amendments. PNMI services were included on several of those pages.

• State plans submitted September 2010

• Informal Requests for Additional Information Issued – December 2010

• Formal Requests for Additional Information Issued - April 2011

• Conference calls with CMS - Ongoing
CMS PNMI Concerns

Reimbursement Concerns

• Bundled Rates/Documentation of Services

• Excessive Rates (Not based on the cost of providing services)

• Payments to Non-Qualified Providers

• Reimbursement to IMDs

• Potential Room and Board Costs

• Non-Risk Contract Provisions Required (Managed Care Waiver)

• Reimbursement for supervision or monitoring for safety are not reimbursable in this setting.
CMS PNMI Concerns

• Service Concerns:

  - Consumer Choice of Providers (for each component, and not tied to housing)

  - Comparability of Services to those in the community (Based on functional need, not residential setting)
    - Rehabilitative Services
    - Personal Care Services

  - Comparability of Qualified Providers (to those in community)

  - Duplication of services (ie, Personal Care, Targeted Case Management)
CMS PNMI Concerns

Residential Setting Concerns

• Services intended to be community based provided in “institutional or facility based settings

• IMD setting?

• Olmstead provisions
• IMD letter* (*CMS letter dated August 9, 2011*)

• DHHS staff had several calls with CMS to get more clarification on IMD letter, and was directed to CMS State Medicaid Manual, Section 4390* for more detail.

DHHS Response to IMD letter

- Communications to PNMI Providers Sent on September 1, 2011
  - Reimbursement Changes Letter*
  - IMD Summary*
  - Copy of CMS Letter*

• DHHS Staff Developed Survey from Medicaid Manual Questions

• Assessment Worksheet*

IMD Telephone Calls

• DHHS staff made calls starting September 7, 2011 to all MaineCare enrolled PNMI providers to complete the Assessment Worksheet

• DHHS Staff spoke with a total of 155 agencies about 472 separate PNMI sites/programs

• Analysis Continues- Summary of Details will be posted on website soon
## IMD Assessment

### 152 Agencies Contacted at 472 Sites

<table>
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<tr>
<th>Agencies</th>
<th>Sites</th>
<th>&lt;50% mental illness</th>
<th>Adults 50% or more with mental illness</th>
<th>Children 50% or more with mental illness</th>
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</thead>
<tbody>
<tr>
<td>89</td>
<td>221 Sites</td>
<td>-</td>
<td>&lt;50% mental illness</td>
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</tr>
<tr>
<td>38</td>
<td>135 Sites</td>
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<td>Adults 50% or more with mental illness</td>
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</tr>
<tr>
<td>25</td>
<td>116 Sites</td>
<td>-</td>
<td>Children 50% or more with mental illness</td>
<td></td>
</tr>
</tbody>
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Maine’s Limitations and Things to Consider

• Need to keep within current state resources

• Must comply with Federal and Maine regulations
Next Steps – Regional Forums

In November, DHHS will host six PNMI Provider “Work Sessions” which will provide the opportunity for more interactive discussions and brainstorming which will help guide this initiative.

November 7    Augusta
November 8    Presque Isle
November 9    Bangor
November 10   Rockland
November 17   Lewiston
November 18   Biddeford

Times and locations, including a registration page, will be available on our PNMI web page this week.
Guiding Principles

The following are our Guiding Principles throughout this initiative:

• Consumer focused

• Recognition that the current model is not sustainable

• No additional State dollars

• Compliance with all State Federal statutes

• Assurance of quality services (value based purchasing)

• Commitment to serve the most vulnerable/needy of the eligible population

• Least restrictive setting (Olmstead)

• Minimized disruption to people’s lives and essential services

• Recognition of the importance and value of collaboration with this transition
Any questions?
Thank you!

Please visit our PNMI website for materials from today and to keep up to date:

http://maine.gov/dhhs/oms/provider/pnmi.html

Additional questions or comments? Contact Pamela Easton at pamela.easton@maine.gov