# Office of MaineCare Services Section 1115 Substance Use Disorder Care Initiative



## What is an IMD?

#### Institute of Mental Disease (IMD)

- Hospital, nursing facility, or other institution of more than 16 beds
- Primarily engaged in providing diagnosis, treatment, or care of persons with mental illness

#### **IMD** Exclusion

- Enacted in 1965 as part of the Social Security Amendments (P.L. 89-97)
  - Assured primary responsibility for funding inpatient psychiatric services in IMDs falls on states.
  - Hospitals and Psychiatric Residential Treatment Facilities
     providing inpatient psychiatric treatment to beneficiaries under
     21 years of age are exempt

## What is an IMD?

#### Is it an IMD?

- Appendix B Private Non-Medical Institution with 15 beds
- ✓ Appendix B Private Non-Medical Institution with 20 beds
- Medically supervised withdrawal unit of an acute care hospital that has a total of 200 beds
- Psychiatric Residential Treatment Facility
- ✓ State Operated Psychiatric Hospitals (Riverview or Dorothea Dix)
- Psychiatric Hospitals for Children under 21 (Spring Harbor and Acadia Hospitals)

## What are 1115 waivers?

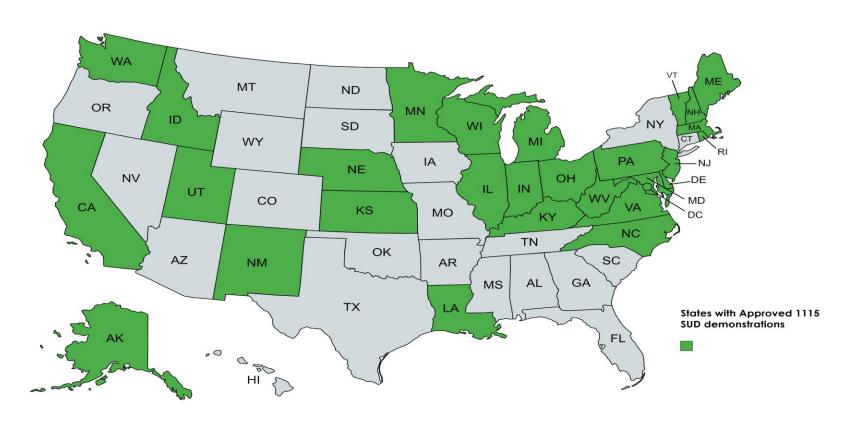
- Gives U.S. Health and Human Services the authority to waive certain provisions of Medicaid law to give states flexibility to design and improve their programs.
- Waivers may approve experimental, pilot, or demonstration projects that promote the objectives of Medicaid and the Child Health Insurance Program (CHIP).

#### 1115 IMD Exclusion Waiver

- November 2017: Centers for Medicare and Medicaid Services (CMS) issued a "State Medicaid Director" letter (<u>SMD #17-003</u>), which offered states a new opportunity to address Substance Use Disorders (SUD)/Opioid Use Disorders (OUD) through waiving what is known as the "IMD Exclusion."
- IMD exclusion prevents federal Medicaid funds from paying for IMD services for adults under age 65.

## Approved 1115 Waivers Nationwide

Since the Demonstration option became available, 29 states, including Maine have received approval to implement SUD demonstration waivers.



## Maine's Demonstration

Maine's 1115 SUD IMD Exclusion Waiver submission to CMS (November 2019) paired expansion of access to facility-based care with system reform and creation of "pilot" programs to close gaps in Maine's SUD system of care.

- Maine received CMS approval for the IMD exclusion December 2020.
- Pilot Programs (still under CMS review):
  - Home-based skills development service
    - Parenting support programs
    - Attachment and Biobehavioral Catch-up
    - Visit Coaching
  - Structured Recovery Housing
  - Eligibility expansion for parents working toward reunification

# MaineCare's Existing SUD Delivery System

#### Care Coordination

- Targeted Case Management
- Opioid Health Homes

## Outpatient services

- Early Intervention Services
- Comprehensive Assessment and Outpatient Therapy
- Intensive Outpatient Therapy
- Medication Management
- Medication Assisted Treatment
   (e.g. Office-Based Opioid
   Treatment, Methadone)

#### Residential Services

- Halfway House Services
- Extended Care
- Residential Rehabilitation Type I
- Residential Rehabilitation Type II
- Adolescent Residential Rehabilitation
- Non-Hospital Medically Managed
   Withdrawal

# 1115 Waiver Components

- Execute Implementation Plan
- Quarterly reporting on monitoring metrics
- Independent evaluation of waiver impacts
- Mid-point assessment
- Budget/expenditure reporting
- Changes to MIHMS system

## 1115 Waiver Components continued...

Goals and Milestones are set by CMS. Every state must submit an implementation plan addressing how it will meet the goals and milestones, which much be approved before the state can operationalize the demonstration.

#### **Demonstration Goals**

- 1. Increase rates of identification, initiation, and engagement in treatment.
- 2. Increase adherence to and retention in treatment, especially in community settings.
- 3. Reduce overdose deaths, particularly those due to opioids.
- 4. Reduce utilization of emergency departments and inpatient hospital settings for treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services.
- 5. Reduce readmissions to the same or higher level of care where the readmission is preventable or medically inappropriate.
- 6. Improve access to care for physical health conditions among beneficiaries.

# 1115 Waiver Components continued...

#### Milestones

- Access to critical levels of care for OUD and other SUDs
- Widespread use of evidence-based, SUD-specific patient placement criteria;
- Use of nationally recognized, evidence-based, SUD program standards to set residential treatment provider qualifications;
- Sufficient provider capacity at each level of care, including MAT;
- Implementation of comprehensive treatment and prevention strategies to address opioid misuse and OUD; and
- Improved care coordination and transitions between levels of care

# Implementation Plan Highlights

Initiatives in Progress	Planned Activities
SUPPORT for ME: Service Locator Tool	Kepro assistance in appropriateness of care assessments (TBD)
SUPPORT for ME: Provider capacity, access, and care integration assessments	Close quality assurance gaps to create a more integrated residential provider oversight process (OCFS, OBH, Licensing, MaineCare)
SUPPORT for ME: Appendix B rate study	Strengthen requirements/incentives for App. B providers to offer/ facilitate access to MAT
Require use of American Society of Addiction Medicine (ASAM) patient placement criteria	Add ASAM placement criteria expectation to OHH; revise model to expand access  Use SUPPORT for ME Learning Community to educate providers on ASAM
Improve Prescription Drug Monitoring Plan functionality	
MaineCare policy and Value Based Purchasing: Clarify coverage; remove stigmatizing	

language; assess ways to improve access to SUD services, support transitions of care; explore  $\perp \perp$ 

incentives and quality measurement to improve outcomes across the continuum.

# Operationalizing the Demonstration

#### Pilots:

• Still awaiting decision from CMS. If approved, instructions will follow.

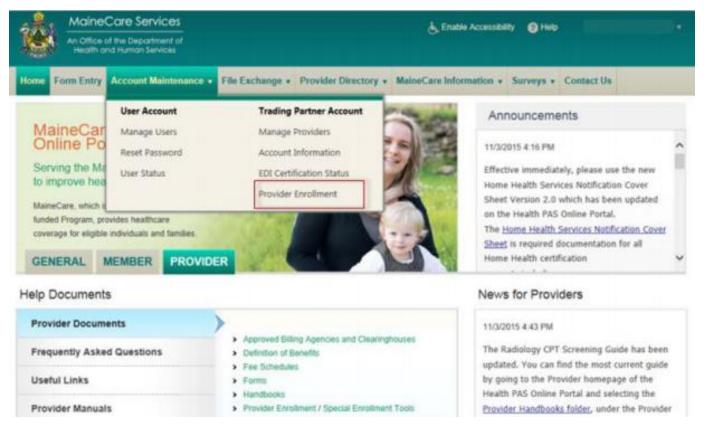
#### **Demonstration:**

- OMS is configuring our systems to have an IMD Specialty under Provider Type
   55.
  - Providers must be enrolled as MaineCare providers with this Provider Type.
  - Currently enrolled providers will need to update their enrollment through a Maintenance Case in HealthPAS.
  - Providers will need to update their license with the Division of Licensing and Certification.
    - Submit a Substance Abuse Agency License Application and Change form.
    - A State Fire Marshall inspection may be needed for approval.

# Starting Your Enrollment

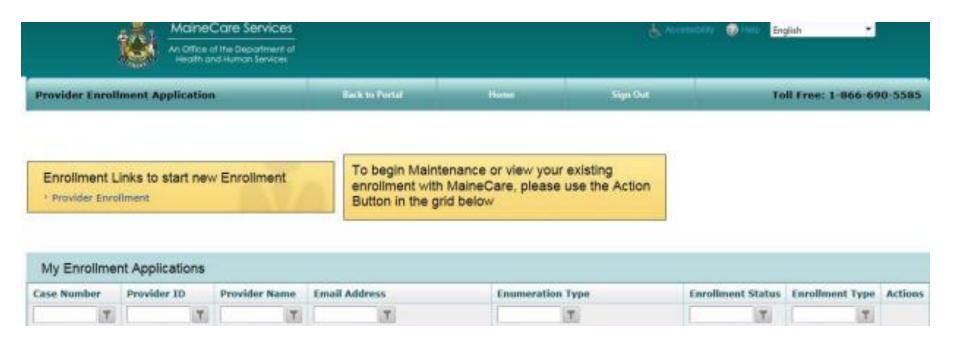
- Submitting the Enrollment/Maintenance Case
- Utilizing the MaineCare Health PAS Online Portal

https://mainecare.maine.gov/Default.aspx



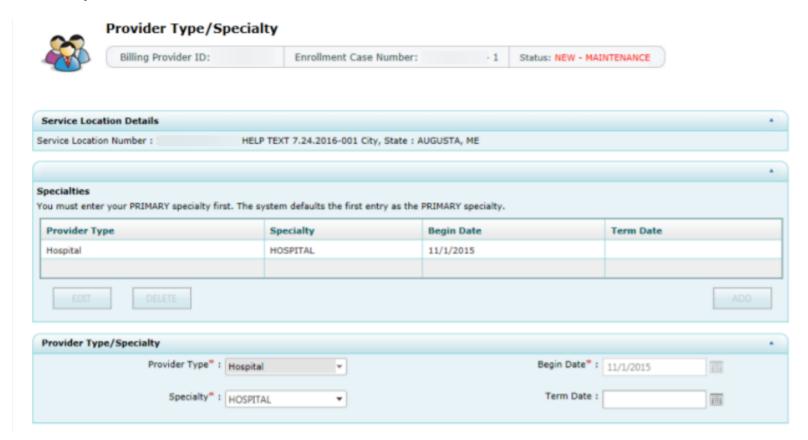
## Starting Your Enrollment continued

- Enrollment User Guides Available
- Contact Provider Services 1-800-690-5585, Option 1



# Adding a New Specialty to MaineCare

- 1115 SUD Waiver requires to ADD Specialty IMD Waiver
- Terminate your current Specialty
- Ensure your Agency License is updated
- Submit your maintenance case



## Licensing Process

#### **DLC SUD Agency Application/Change Form Submission**

https://www.maine.gov/dhhs/dlc/licensing-certification/behavioral-health

Change of capacity and new site applications require a licensing inspection and an inspection by the State Fire Marshal's Office (SFMO).

- When DLC receives the agency application, a SFMO inspection will be requested, and will take place independently of the DLC inspection.
- DLC approval of increased capacity and new site applications is dependent upon SFMO approval.
- Following DLC approval of change applications, an updated license and letter will be sent to the provider reflecting the new site or capacity.

## Questions?

## Dean Bugaj

Children's and Behavioral Health Manager

Dean.Bugaj@maine.gov

#### **Aaron Fotter**

Provider Enrollment Manger

Aaron.Fotter@maine.gov

### **Heather Hyatt**

Assistant Director of Community HealthCare Programs

Heather.Hyatt@maine.gov

