

Behavioral Health 1915(c) HCBS Waiver Renewal Feedback Session

BEHAVIORAL AND PHYSICAL HEALTH AND AGING SERVICES
ADMINISTRATION



Agenda

- I. Introductions and Housekeeping Items
- II. Purpose and Session Objectives
- III. Behavioral Health 1915(c)HCBS Waivers in Michigan
- IV. 1915(c)HCBS Waiver Renewal
 - a. Renewal timelines
 - b. Renewal process and requirements
- V. Opportunity for Feedback
 - a. Waiver services
 - b. Waiver processes
 - c. Waiver Requirements
 - d. Other
- VI. Important Links
- VII. Feedback Session Schedule
- VIII. Feedback Received
- IX. Conclusion

Introductions



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Housekeeping Items

- I will pause to take questions throughout the presentation.
- We have allocated time in the presentation for feedback to be provided.
- Can use Q and A or raise hand to ask a question or provide feedback.

The Behavioral Health 1915(c)HCBS Waivers - which includes the Habilitation Supports Waiver (HSW), Children's Waiver (CWP) and Serious Emotional Disturbance Waiver (SEDW) - expires on Sept. 30, 2024, and is up for renewal. With this renewal, MDHHS is looking for feedback from Medicaid Beneficiaries on these waivers, their families, staff who provide waiver services, providers, and community partners. MDHHS has scheduled six feedback sessions in the months of August and September to receive input on what we can do to improve Michigan's behavioral health 1915(c)HCBS Waivers. Feedback from these listening sessions will be used to help inform areas of need and where improvements can be made.

Objectives

1. Gain knowledge about current behavioral health 1915(c)HCBS Waivers in Michigan.
2. Opportunity to provide feedback and suggestions regarding services, processes, and requirements of the behavioral health 1915(c)HCBS Waivers in Michigan.
3. Learn about behavioral health 1915(c)HCBS Waivers renewal process, requirements, and timelines.

Behavioral Health 1915(c)HCBS Waivers in Michigan

Habilitation Supports Waiver (HSW)

General Overview:

The HSW eligibility requirements include:

The participant is a person of any age with an intellectual/developmental disability, is living in a community-based setting (not in a hospital, ICF/IID, nursing facility, correctional facility or child caring institution) while receiving HSW services, has current Medicaid eligibility, and would otherwise require the level of care services provided in an ICF/IID if not for the availability and provision of HSW services in the community. The HSW participant must require and receive at least one HSW habilitative service per month.

Maximum Waiver Participants: 7902

HSW Services:

- Community Living Supports
- Enhanced Medical Equipment & Supplies
- Enhanced Pharmacy
- Environmental Modifications
- Family Support and Training
- Goods and Services
- Out-of-Home Non-Vocational Habilitation
- Personal Emergency Response System (PERS)
- Prevocational Services
- Private Duty Nursing
- Respite
- Supported/Integrated Employment
- Fiscal Intermediary
- Non-Family Training
- Overnight Health and Safety

HSW Certification

- Assignment of slots is managed by MDHHS. Each Prepaid Inpatient Health Plan (PIHP) has an annual allocation of active enrollments - cannot be exceeded.
- Priority for filling slots:
 1. Children aging off Children's Waiver Program.
 2. Beneficiaries who are determined to be at high risk of Intermediate Care Facilities for individuals with Intellectual Disabilities (ICF/IID).
 3. Beneficiaries aged 21 and older who need Private Duty Nursing (PDN) and meet HSW eligibility.

Applying for the HSW

- The PIHP completes an enrollment request packet for submission to MDHHS.
- If the PIHP has an available slot, an enrollment request is initiated.
- MDHHS reviews the enrollment request packet and decides on whether the person meets all the eligibility criteria for HSW.
- If the information supports the need for HSW services and the PIHP has an available slot, then MDHHS will enroll the person and issue an approval to the PIHP.

HSW Annual Recertifications

- Enrolling in the HSW is for a one-year period, not a lifetime.
- The PIHP completes a recertification request packet for submission to MDHHS.
- MDHHS will determine eligibility and recertify within 365 days.

HSW Purpose

To provide community-based support to people with intellectual/developmental disabilities who would otherwise require the level of care provided in an ICF/IID. The goal of this waiver is to enable people with significant needs caused by I/DD to live and fully participate in their communities.

CWP Eligibility

- Meet intellectual and developmental disability (I/DD) criteria
- Must be under the age of 18
- Reside with birth or legally adoptive parent(s) or legal guardian
- At risk of ICF/IID, or currently resides in ICF/IID but could return home with appropriate support
- Meet Medicaid eligibility as a family of one (parent's income waived)
- Intellectual or functional limitations indicate eligibility for health, habilitative and active treatment services provided at the ICF/IID level of care

Children's Waiver (CWP)

General Overview:

The purpose of the CWP is to provide community-based services to children under age 18 who, if not for the availability and provisions of CWP services, would otherwise require the level of care and services provided in an Intermediate Care Facility for Individuals with Intellectual Disabilities (ICF/IDD). The goal of the CWP is to enable children with developmental disabilities who have significant needs and who meet the CWP eligibility requirements to live with their parents or legal guardians and to fully participate in their communities. The objective is to provide regular Medicaid State Plan services and waiver services that address the child's/youth's identified needs.

Maximum Waiver Participants: 569

CWP Services:

- Community Living Supports
- Enhanced Transportation
- Environmental Accessibility Adaptations (EAA)
- Family Support and Training
- Fiscal Intermediary
- Non-Family Training
- Overnight Health and Safety Supports
- Specialized Medical Equipment & Supplies
- Specialty Services (Massage, Recreation, Music and Art Therapy)
- Respite
- Fencing

CWP Enrollment and Annual Recertification

- Prospective CWP youth must contact the local Community Mental Health Service Provider (CMHSP) and request an assessment specifically for the CWP.
- The CWP serves as a pathway to Medicaid, and per CMS this pathway must not be blocked. Whenever the CWP is specifically requested and subsequently denied, notice of denial and right to Medicaid Fair Hearing must be provided even if lesser intensive service(s) is offered.
- A prescreen must be submitted to the state for review.
- MDHHS will review and score the prescreen, which reflects level of need for covered services.
- Child will be placed on a weighing list based on score.
- MDHHS issues invitations to enroll in the CWP every month.
- The waiver functions at full capacity so a priority weighing list is utilized to enroll children in order of highest need.
- Recertification is submitted and reviewed annually to ensure continued eligibility for CWP.

CWP Purpose

To enhance the likelihood of children with IDD who have severe medical and/or behavioral needs to remain in the family home where they can access supports otherwise not available to the families who care for them. The waiver is focused on maximizing skill development and capacity for future independence while considering all aspects of the children's life including the family system. In order to meet the goals of the waiver, children should fully participate in their communities and live out their lives without being removed from their natural home.

The Waiver for Serious Emotional Disturbance (SEDW)

General Overview:

The SEDW provides services that are additions to Medicaid State Plan coverage for children with SED who are enrolled in the SEDW, up to the child's 21st birthday. This waiver permits the State to provide an array of community-based services to enable children who would otherwise require hospitalization in our State Psychiatric hospital for children (Hawthorn Center) to remain in their home and community.

Maximum Waiver Participants: 969

SEDW Services:

- Community Living Supports
- Child Therapeutic Foster Care
- Therapeutic Activities (Recreation, Music, and Art Therapy)
- Therapeutic Overnight Camp
- Family Support and Training
- Fiscal Intermediary
- Non-Family Training
- Overnight Health and Safety
- Respite
- Wraparound

The Waiver for Serious Emotional Disturbance (SEDW)

Eligibility

- Residence - Reside with a birth or adoptive family or have a plan to return to the birth or adoptive home; or reside with a legal guardian; or reside in a foster home with a permanency plan; or be age 18 or 19 and live independently with supports; AND (must be under the age of 18 when approved for the waiver)
- Meet current MDHHS criteria for psychiatric hospital for children or are at risk of hospitalization without waiver services; The individual must meet all three criteria: Diagnosis, Severity of illness, and Intensity of services
- Meet Medicaid eligibility criteria and become a Medicaid Beneficiary

The Waiver for Serious Emotional Disturbance (SEDW)

Eligibility Continued

- Demonstrate serious functional limitations that impair the ability to function in the community
 - Ages 7 to 12 a CAFAS score of 90 or greater; OR
 - Ages 13 to 18 a CAFAS score of 120 or greater; OR
 - Ages 3 to 6, elevated PECFAS subscale scores in at least one of these areas: self-harmful behaviors, mood/emotions, thinking/communicating or behavior towards others; OR
 - Ages 2-4, scores in the concern range across Devereux Early Childhood Assessment (DECA) Clinical Version scales:
 - Protective factor scales (initiative, self-control and attachment) that are in the Concern Range with a Total Protective Factor T-score of 40 or below and/or
 - Elevated scores on one or more of the behavioral concerns 32 scales (attention problems, aggression, withdrawal/depression, emotional control problems) with a T-score of 60 or above

SEDW Enrollment and Annual Recertification

- Prospective SED Waiver youth must contact the local CMHSP and request an assessment specifically for the SED Waiver.
- The SEDW serves as a pathway to Medicaid, per CMS this pathway must not be blocked. Whenever the SEDW is specifically requested and subsequently denied, notice of denial and right to Medicaid Fair Hearing must be provided even if lesser intensive service(s) is offered.
- Must have a primary Serious Emotional Disturbance (SED) qualifying diagnosis.
- Must receive at least one SEDW service (other than Wraparound) per month in order to retain eligibility.
- Eligibility is good for one year.
- Eligibility is reviewed annually.
- SEDW is intended for one year, with the possibility of a second year.
- Intensity of services are provided in lieu of hospitalization/out of home placement and that Wraparound is a mandatory service.

SEDW Purpose

To support not only progress towards improved overall functioning, but also sustained progress over time using the Wraparound planning process to help maintain high needs children/youth in the family home or in the community where they are most successful. This goal serves the best interest of the child, family, and the behavioral health agencies.

1915(c) HCBS Waiver Renewal

Renewal timeline, process and requirements

1915(c)HCBS Waiver Renewal

Renewal timeline

Description	Date
Waiver Quality Report	December 2022
CMS Draft Report to State	4/30/23
Waiver Renewal Feedback Sessions	Will be scheduled from May-September 2023
Michigan Response to CMS	7/28/2023
Final Report due to State	9/30/23
Renewal alert letter due to State	4/3/24
Renewal application due to CMS	7/2/24
Waiver Expiration Date	9/30/24

1915(c)HCBS Waiver Renewal

Renewal Process and Requirements

Process and Requirements:

- Complete required reporting to CMS.
- Feedback sessions with community partners, Pre-paid Inpatient Health Plans (PIHP), Community Mental Health Service Providers (CMHSP), Medicaid beneficiaries and their families.
- Complete application changes based on feedback.
- Ensure deadlines are met.
- 30-Day Public comment period.
- Internal review and approval.
- Submission to CMS for final approval.

Opportunity for Feedback

Opportunity for Feedback

Waiver Services-Medicaid services provided through the HSW, CWP and SEDW.

Things to consider:

- Are there services not currently included in the waiver that should be?
- Are there services underutilized or not beneficial currently in the waiver?
- How can current waiver services be improved?
- Are their services provided in one waiver that should be provided in another?
- Can provider requirements for certain services be changed?

Opportunity for Feedback

Waiver Processes-Processes related to eligibility, enrollment, and recertification.

Things to consider:

- Can the processes for enrollment and recertifications be improved?
- Suggestions to create efficiencies with waiver processes.
- Changes to the eligibility process, requirements, etc.

Opportunity for Feedback

Waiver Requirements-
Requirements related to documentation, performance measures, enrollment, recertifications, oversight, staffing, training, etc.

Things to consider:

- Suggestions to reduce paperwork requirements.
- Suggestions to reduce staff qualification and training requirements.
- Efficiencies for oversight of waivers.
- Are some requirements necessary?

Opportunity for Feedback

Other

Things to consider:

- Suggestions to improve the quality of waiver services.
- Suggestions to increase the number of individuals served on the waivers.
- Policy language changes.

Links to Waiver Applications

- SEDW Waiver Application Link:
- [Application for 1915\(c\) HCBS Waiver: Draft MI.004.03.00 - Oct 01, 2019 \(michigan.gov\)](#)
- HSW Waiver Application Link:
- [Application for 1915\(c\) Home and Community-Based Services Waiver \(michigan.gov\)](#)
- CWP Waiver Application Link:
- [Childrens Waiver Program Renewal Approval-April 2011.pdf \(michigan.gov\)](#)

Upcoming Feedback Sessions



Session Six :

Wednesday, September 27, 2023: 10 - 11:30 a.m.

https://msu.zoom.us/webinar/register/WN_7IRgaMlfRbejMJb1QWQ-5

Questions/Feedback

Feedback Received: HSW

Addition of Specialty services: Music Therapy, Recreation Therapy and Massage Therapy

PDN/Habilitative Service Clarification

Goods and Services to include approached to improve health and wellness and remove must replace human service requirement.

Consider addition of adaptive clothing to medical equipment and supplies benefit.

Equine Therapy for HSW

Consider moving the IDD services out of the Mental Health code into Long Term care.

Add T2047 code under HSW (15-minute code vs hourly).

It would be great if the HSW could cover more needed equipment needed by individuals with severe medical needs.

Feedback Received: HSW

TEFRA as a covered population

Code modifications to prevocational (make 15-minute codes and bring back the H0043 Per Diem CLS code).

More HSW slots for some regions.

Allow guardians or responsible relatives to be paid caregivers. (Across all three waivers)

Remove Licensed residential bed limit (currently 12 beds).

Reduce the bed limit number.

Count ABA services as a habilitative services for HSW up to the age of 21. (Across all waivers).

Feedback Received: HSW

Increase time between recertification requirements. (Annual recertifications are a CMS requirement and cannot be changed).

Reduce required documentation for the HSW.

Decrease the layers required for approval. (This would require a system change.)

Make the consent due at the same time as the recertification.

Make the WSA easier to use. (Across all three waivers)

More users allowed in the WSA. (Across all three waivers)

Be more transparent with audit requirements.

Add personal care services to waivers. (Eliminates need to apply for Home Help)

Provide clarifying language for Overnight Health and Safety (Across all waivers)

Expand enhanced pharmacy.

Feedback Received: SEDW

Parent Support Partners-Look at Time limits on units

Clarify 16 hours of training

Remove Wraparound as a requirement

Change language on OHSS and replace with something else to cover overnight behaviors that are non-medical

Add Phone number as required field in the WSA.

Waiting too long for services. Improve access process.

Can Music/Art/Rec Therapist provide services while working toward board certification? (CWP).

Feedback Received: SEDW

Add language about Independent Living to include licensed Independent Living Program. Current language not clear about requirements for independent living.

Modify language that says SEDW is intended for one year, but with the possibility of a second year. It would be helpful to clarify that this SEDW is intended to be short

Create more information regarding waivers that can be shared; like pamphlets.

Add language clarifying language to clarify residence requirements to specify birth family means biological mother/father and add birth family with current parental rights intact.

Add more options for telehealth services.

Feedback Received: CWP

Request more slots

Re-evaluate lifetime eligibility

Change language on OHSS and replace with something else to cover overnight behaviors that are non-medical.

Application process for the CWP takes too long, for one person took a year.

Across all waivers-Case Managers need to be better trained on the waivers and waiver services. This causes a delay with families and individuals applying for the waivers.

Clearer guidelines on home modifications and other DME type items that are available through the CWP.

Credentialing: Changing the 1 year of DD experience or allowing an SC without the year of experience to be supervised by a QIDP. It can be challenging at times to find staff that have this.

Fencing service could be clarified to include additional considerations, including but not limited to behavior treatment committee reviews, etc.

Session Conclusion



Thank you for attending the Behavioral Health 1915(c) HCBS Waiver Renewal Feedback Session. We appreciate your feedback and participation in this session.

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