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December 3, 2024

Alex Desatoff
Demonstration Project Officer
Center for Medicaid and CHIP Services (CMCS)

Dear Alex Desatoff:

Idaho Medicaid is requesting to extend the State's [11-W-00339/10: 1115 IMD Behavioral Health Transformation Demonstration](#) for another five (5) years.

The State Medicaid Agency has observed improved access to medically necessary services to include residential facilities serving those with mental health and/or substance use service needs and intensive outpatient services. Other key observed impacts include improved treatment coordination for Opioid Use Disorder and decreases in inappropriate opioid prescribing (albeit likely more due to changing national provider norms). While access to these services has improved under the waiver, the State Medicaid Agency continues to meet budget neutrality requirements.

Renewal of this waiver will allow the State Medicaid Agency to continue to make progress on the goals set forth in the demonstration. The next five (5) years ahead are of particular importance as the State Medicaid Agency has recently implemented a new stand-alone behavioral health managed care contract to partner with the agency to further improve behavioral health workforce and capacity; access to medically necessary services; and coordination of these services for both youth and adults. The State Medicaid Agency is optimistic that Idaho will see even further progress towards these goals in the years ahead.

The State Medicaid Agency will also be requesting to adjust its authority structure for a particular eligibility group and move from the approved 1915(i) authority to the 1115 authority by adding the following expenditure authority.

Youth Empowerment Services (YES) Group. Expenditures to extend eligibility for full Medicaid state plan benefits to youth under age eighteen (18), diagnosed with a Serious Emotional Disturbance (SED), and with a family income up to three hundred percent (300%) of the Federal Poverty Guidelines (FPG).

SUD Demonstration Goals:

1. Increased rates of identification, initiation, and engagement in behavioral health treatment.
2. Increased adherence to and retention in behavioral health treatment.
3. Reductions in overdose deaths, particularly those due to opioids.
4. Reduced 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. Fewer readmissions to the same or higher level of care, where the readmission is preventable or medically inappropriate.
6. Improved access to care for physical health conditions among beneficiaries.

SMI/SED Demonstration Goals:

1. Reduced utilization and lengths of stay in emergency departments among Medicaid beneficiaries with SMI or SED while awaiting mental health treatment in specialized settings.
2. Reduced preventable readmissions to acute care hospitals and residential settings.
3. Improved availability of crisis stabilization services, including services made available through call centers and mobile crisis units, intensive outpatient services, as well as services provided during acute short-term stays in residential crisis stabilization programs, psychiatric hospitals, and residential treatment settings throughout the state.
4. Improved access to community-based services to address the chronic mental health care needs of beneficiaries with SMI or SED, including through increased integration of primary and behavioral health care.
5. Improved care coordination, especially continuity of care in the community following episodes of acute care in hospitals and residential treatment facilities.

This extension request aligns with [42 C.F.R. Part 431 Subpart G - Section 1115 Demonstrations](#), as further defined in the [CMS approved Standard Terms and Conditions of the state's approved 1115 demonstration](#).

The State Medicaid Agency requests an effective date of April 1, 2025.

The State Medicaid Agency is diligently preparing to start the public comment process this month. Tribal solicitation and public notice will be completed by providing a thirty (30) day

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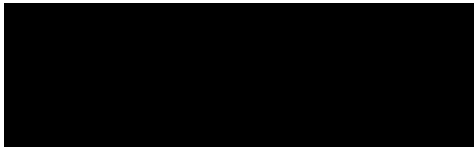
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public notice and comment period and by scheduling two (2) public hearings, each one (1) hour long. At these hearings the most recent working proposal will be described and made available to the public, and time will be provided during which comments were received.

Tribal solicitation will also be completed by sending a Dear Tribal Leader Letter to Tribal representatives.

Idaho anticipates submitting the 1115 Demonstration renewal application no later than the very beginning of 2025. Idaho appreciates your review of this extension request and anticipates CMS approval. Please direct any questions to Charles Beal, Medicaid Policy Director, at charles.beal@dhw.idaho.gov.

Sincerely,

A large black rectangular redaction box covering the signature area.

JULIET CHARRON
Deputy Director

JC/ah

cc: Courtenay Savage, Julie Sharp