

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard, Mail Stop S2-25-26  
Baltimore, Maryland 21244-1850



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## State Demonstrations Group

March 29, 2024

Michael Randol  
State Medicaid Director  
Department of Public Health and Human Services  
111 North Sanders, Room 301  
Helena, MT 59620

Dear Director Randol:

The Centers for Medicare & Medicaid Services (CMS) completed its review of Montana's Final Report for the Vaccine Administration Payments COVID-19 Public Health Emergency (PHE) amendment to the section 1115 demonstration entitled, "Montana Plan First" (Project Number 11-W-00276/8). This report covers the demonstration period from December 14, 2020 to March 10, 2021. CMS determined that the Final Report, submitted on October 26, 2023 is in alignment with the requirements in the amendment approval letter, and therefore, approves the state's Final Report.

In accordance with 42 CFR 431.424(d), the approved Final Report may now be posted to the state's Medicaid website within 30 days. CMS will also post the Final Report on Medicaid.gov.

Despite the state being unable to administer vaccines under this amendment, we sincerely appreciate the state's commitment to evaluating the Vaccine Administration Payment COVID-19 PHE amendment under these extraordinary circumstances. We look forward to our continued partnership on the Montana Plan First section 1115 demonstration. If you have any questions, please contact your CMS demonstration team.

Sincerely,



Danielle Daly  
Director  
Division of Demonstration Monitoring and Evaluation

cc: Barbara Prehmus, State Monitoring Lead, CMS Medicaid and CHIP Operations Group

**Montana Plan First Family Planning Demonstration**  
**Section 1115 Family Planning Waiver**  
**Final Report**  
**Consolidating the monitoring and evaluation requirements for the**  
**Time-limited Expenditure Authority and Associated Requirements for the**  
**COVID-19 Public Health Emergency (PHE) Demonstration Amendment**  
**Submitted 10/26/2023**

**Executive Summary**

On January 21, 2021, the Montana Department of Public Health and Human Services (DPHHS) submitted an emergency COVID-19 Section 1115(a) Demonstration amendment application relevant to the Montana Plan First, (Project Number 11-W-00276/8) Family Planning Demonstration Waiver. The amendment requested authority for the vaccine and vaccine's administration, approved by the Food and Drug Administration (FDA) under an Emergency Use Authorization (EUA), to prevent COVID-19 addition to the Montana Plan First Waiver's list of covered services. This amendment request was approved by the Centers for Medicare & Medicaid Services (CMS) January 14, 2022.

**General Background Information**

Montana's Plan First section 1115 Medicaid demonstration was initially approved May 30, 2012 and has continued until the present with only minor changes. The current demonstration provides family planning services to enrolled women statewide who are:

- Montana residents;
- Ages 19 – 44 with income up to and including 211% of the federal poverty level; and
- Able to bear children and not presently pregnant.

Plan First offers family planning services for eligible women. Some of the services covered include office visits, contraceptive supplies, laboratory services, and testing and treatment of STDs. A large portion of Plan First members enrolled through Title X family planning clinics. These clinics are commonly staffed with mid-level providers. A recent look at provider types utilized by Plan First members included:

- Physicians;
- Mid-Levels;
- Pharmacy; and
- Laboratory.

The waiver is capped at 4,000 members and currently includes approximately 1,800 women.

## Public Health Emergency (PHE) Flexibility Goals

The emergency COVID-19 PHE amendment to Montana Plan First section 1115(a) Family Planning demonstration aimed to assist the state in delivering the most effective care to its beneficiaries in light of the COVID-19 PHE. The demonstration amendment was intended to assist in promoting the objectives of the Medicaid statute because it was expected to help the state furnish the preventive COVID-19 vaccine in a manner intended to protect, to the greatest extent possible, the health, safety, and welfare of Montanans.

## Demonstration Objectives/Goals

To support the aims of the state's broader 1115 demonstration, the evaluation questions and hypotheses are aligned with the broader goal of increasing access to care. Specifically, this evaluation will examine evidence that the vaccine flexibilities support the overarching demonstration goal of increased access to care.

## Research Questions

The following are qualitative research questions aimed at understanding the challenges presented by the COVID-19 public health emergency to the Medicaid program.

1. What were the principal challenges associated with engagement with Plan First beneficiaries during this public health emergency?
2. What strategies did the state pursue to address challenges?
3. What policies and procedures were most helpful to the state and providers in leveraging flexibilities to reduce barriers and ensure access to care, including accessing medical supplies and equipment?
4. What population groups were principally affected by this demonstration?
5. What were the unresolved or ongoing challenges related to implementation of the demonstration flexibilities?

## Hypotheses

1. Increase access to COVID vaccination for Plan First members who receive Family Planning only benefits.
2. Reduce the need for access to care for COVID related issues for the Plan First population.

## Evaluation Questions

Evaluation Question	Method of Evaluation
How did beneficiaries utilize covered vaccine health services?	Measure trend over the demonstration life cycle.
Does the demonstration amendment improve health outcomes?	Measure trend over the demonstration life cycle.

## Design Measure Structure

Evaluation Component	Evaluation Question	Evaluation Hypotheses	Measure (to be reported for each Demonstration Year)	Recommended Data Source	Analytic Approach
Process	How did beneficiaries utilize covered vaccine health services?	Increase access to COVID vaccination for Plan First members who receive Family Planning only benefits.	Number of Plan First enrollees receiving the COVID-19 vaccination.	Plan First claim data from the MT claims reporting system.	Baseline data distinct count of Plan First members receiving a COVID vaccination during the period 12/14/2020 and 3/10/2021.
Process	Does the demonstration amendment improve health outcomes?	Reduce the need for access to care for COVID related issues for the Plan First population.	Number of Plan First enrollees receiving the COVID-19 vaccination and number of Plan First enrollees with claims containing a COVID diagnosis.	Plan First claim data from the MT claims reporting system.	Baseline data includes claims with dates of service during the period 12/14/2020 and 3/10/2021. Distinct count of Plan First members with a COVID diagnosis matched with if the member did or did not receive a vaccination. during the period 12/14/2020 and 3/10/2021.

## Methodological Limitations

The Montana Medicaid Plan First population is very small, and when evaluating the population receiving a COVID vaccine the population is reduced even more. Due to this, the evaluation trend metrics may have high variability and may not be representative of increased health outcomes for Montanans.

## Results

Montana submitted the application for this emergency amendment on January 21, 2021 and CMS approval was received January 14, 2022. However, the applicable window of time for the vaccination administration coverage for this emergency service was limited to dates of service

between December 14, 2020 and March 10, 2021. Since approval of the amendment followed the last date of service that could be covered under the emergency amendment, no vaccine administration was provided to Plan First members through the Plan First waiver.

## **Conclusion**

Montana made the decision to not promote the pending coverage of the COVID vaccine administration, prior to amendment approval. Plan First members may have begun seeking the service and providers may have begun providing it, without approved CMS coverage while the amendment application was under CMS consideration. Montana may have been obligated to pay 100% of the reimbursement rate for state-wide vaccine administration provided by enrolled providers to Plan First members for at least ten months if service had been promoted ahead of approval. Montana was unaware the closing of the coverage window under the amendment was March 10, 2021 until January 14, 2022. There would have been no opportunity to stop promotion of the service in a timely manner if the amendment did not receive CMS approval.

Due to the timing of submission and approval, this waiver amendment proved to be ineffectual for increasing access to the COVID vaccine and therefore did not have an impact, positive or negative, to the health outcomes of Montana Plan First members.