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# MN - Submission Package - MN2024MS0001O - (MN-24-0008) - Health Homes

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CMS-10434 OMB 0938-1188

## Package Information

<b>Package ID</b>	MN2024MS0001O	<b>Submission Type</b>	Official
<b>Program Name</b>	Behavioral Health Homes	<b>State</b>	MN
<b>SPA ID</b>	MN-24-0008	<b>Region</b>	Chicago, IL
<b>Version Number</b>	1	<b>Package Status</b>	Review
<b>Milestone Date</b>	4/22/2024	<b>Submission Date</b>	3/1/2024
<b>Priority Code</b>	P2	<b>Regulatory Clock</b>	48 days remain
		<b>Review Status</b>	Review 1

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
Financial Management Group  
John C. Kluczynski Federal Building  
230 S. Dearborn Street Suite 330F  
Chicago, IL 60604-1505



## Center for Medicaid & CHIP Services

Jodi Harpstead  
Commissioner  
Department of Human Services  
540 Cedar St  
Saint Paul, MN 55155

Re: Approval of State Plan Amendment MN-24-0008 Behavioral Health Homes

Dear Commissioner Harpstead,

On March 01, 2024, the Centers for Medicare and Medicaid Services (CMS) received Minnesota State Plan Amendment (SPA) MN-24-0008 for Behavioral Health Homes to reflect a 3 percent change to Behavioral Health Services identified in the Medicaid State Plan amendment 24-0005. This change was authorized by Laws of Minnesota 2023, chapter 70, article 1, section 35.

We approve Minnesota State Plan Amendment (SPA) MN-24-0008 with an effective date of January 01, 2024.

If you have any questions regarding this amendment, please contact DEBORAH BENSON at [Deborah.Benson@cms.hhs.gov](mailto:Deborah.Benson@cms.hhs.gov)

Sincerely,  
Todd McMillion  
Director, Division of Reimbursement  
Review  
Center for Medicaid & CHIP Services

# Submission - Summary

MEDICAID | Medicaid State Plan | Health Homes | MN2024MS0001O | MN-24-0008 | Behavioral Health Homes

## Package Header

<b>Package ID</b>	MN2024MS0001O	<b>SPA ID</b>	MN-24-0008
<b>Submission Type</b>	Official	<b>Initial Submission Date</b>	3/1/2024
<b>Approval Date</b>	N/A	<b>Effective Date</b>	N/A
<b>Superseded SPA ID</b>	N/A		

## State Information

**State/Territory Name:** Minnesota

**Medicaid Agency Name:** Department of Human Services

## Submission Component

- State Plan Amendment
- Medicaid
- CHIP

### Submission - Summary

MEDICAID | Medicaid State Plan | Health Homes | MN2024MS0001O | MN-24-0008 | Behavioral Health Homes

### Package Header

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<b>Approval Date</b> N/A	<b>Effective Date</b> N/A
<b>Superseded SPA ID</b> N/A	

### SPA ID and Effective Date

**SPA ID** MN-24-0008

Reviewable Unit	Proposed Effective Date	Superseded SPA ID
Health Homes Payment Methodologies	1/1/2024	MN-19-0015

### Submission - Summary

MEDICAID | Medicaid State Plan | Health Homes | MN2024MS0001O | MN-24-0008 | Behavioral Health Homes

### Package Header

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<b>Superseded SPA ID</b>	N/A		

### Executive Summary

**Summary Description Including Goals and Objectives** Change in BHH payments

### Federal Budget Impact and Statute/Regulation Citation


#### Federal Budget Impact

	Federal Fiscal Year	Amount
First	2024	\$120000
Second	2025	\$160000

#### Federal Statute / Regulation Citation

Section 1945 of the Social Security Act

Supporting documentation of budget impact is uploaded (optional).

Name	Date Created	
<a href="#">MN 24-0008 Fiscal Page</a>	1/31/2024 2:47 PM EST	

## Submission - Summary

MEDICAID | Medicaid State Plan | Health Homes | MN2024MS0001O | MN-24-0008 | Behavioral Health Homes

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<b>Superseded SPA ID</b>	N/A		

### Governor's Office Review

- No comment
- Comments received
- No response within 45 days
- Other

# Submission - Public Notice/Process

MEDICAID | Medicaid State Plan | Health Homes | MN2024MS0001O | MN-24-0008 | Behavioral Health Homes

## Package Header



<b>Package ID</b>	MN2024MS0001O	<b>SPA ID</b>	MN-24-0008
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<b>Superseded SPA ID</b>	N/A		

### Name of Health Homes Program

Behavioral Health Homes

Public notice was provided due to proposed changes in methods and standards for setting payment rates for services, pursuant to 42 CFR 447.205.

### Upload copies of public notices and other documents used

Name	Date Created	
<a href="#">Courtesy Copy_ Draft Medicaid SPA 24-0008</a>	1/31/2024 11:24 AM EST	
<a href="#">SRN 2023 Leg session Jan 1 eff dates (1)</a>	1/31/2024 11:24 AM EST	

# Submission - Tribal Input

MEDICAID | Medicaid State Plan | Health Homes | MN2024MS0001O | MN-24-0008 | Behavioral Health Homes

## Package Header

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<b>Superseded SPA ID</b>	N/A		

### Name of Health Homes Program:

Behavioral Health Homes

### One or more Indian Health Programs or Urban Indian Organizations furnish health care services in this state

- Yes
- No

### This state plan amendment is likely to have a direct effect on Indians, Indian Health Programs or Urban Indian Organizations, as described in the state consultation plan.

- Yes
- No

The state has solicited advice from Indian Health Programs and/or Urban Indian Organizations, as required by section 1902(a)(73) of the Social Security Act, and in accordance with the state consultation plan, prior to submission of this SPA.

### Complete the following information regarding any solicitation of advice and/or tribal consultation conducted with respect to this submission:

#### Solicitation of advice and/or Tribal consultation was conducted in the following manner:

All Indian Health Programs

<b>Date of solicitation/consultation:</b>	<b>Method of solicitation/consultation:</b>
1/31/2024	email

All Urban Indian Organizations

<b>Date of solicitation/consultation:</b>	<b>Method of solicitation/consultation:</b>
1/31/2024	email

States are not required to consult with Indian tribal governments, but if such consultation was conducted voluntarily, provide information about such consultation below:

All Indian Tribes

<b>Date of consultation:</b>	<b>Method of consultation:</b>
1/31/2024	email

The state must upload copies of documents that support the solicitation of advice in accordance with statutory requirements, including any notices sent to Indian Health Programs and/or Urban Indian Organizations, as well as attendee lists if face-to-face meetings were held. Also upload documents with comments received from Indian Health Programs or Urban Indian Organizations and the state's responses to any issues raised. Alternatively indicate the key issues and summarize any comments received below and describe how the state incorporated them into the design of its program.

Name	Date Created
<a href="#">MN SPA 24-0008 Tribal Consultation</a>	1/31/2024 11:26 AM EST

#### Indicate the key issues raised (optional)

- Access
- Quality
- Cost



- Payment methodology
- Eligibility
- Benefits
- Service delivery
- Other issue

# Submission - Other Comment

MEDICAID | Medicaid State Plan | Health Homes | MN2024MS0001O | MN-24-0008 | Behavioral Health Homes

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<b>Superseded SPA ID</b>	N/A		

## SAMHSA Consultation

### Name of Health Homes Program

Behavioral Health Homes

The State provides assurance that it has consulted and coordinated with the Substance Abuse and Mental Health Services Administration (SAMHSA) in addressing issues regarding the prevention and treatment of mental illness and substance abuse among eligible individuals with chronic conditions.

<b>Date of consultation</b>
2/26/2015

# Health Homes Payment Methodologies

MEDICAID | Medicaid State Plan | Health Homes | MN2024MS0001O | MN-24-0008 | Behavioral Health Homes

## Package Header

<b>Package ID</b>	MN2024MS0001O	<b>SPA ID</b>	MN-24-0008
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<b>Superseded SPA ID</b>	MN-19-0015		
	User-Entered		

## Payment Methodology

The State's Health Homes payment methodology will contain the following features

- Fee for Service
  - Individual Rates Per Service
  - Per Member, Per Month Rates
  - Fee for Service Rates based on
    - Severity of each individual's chronic conditions
    - Capabilities of the team of health care professionals, designated provider, or health team
    - Other
- Comprehensive Methodology Included in the Plan
- Incentive Payment Reimbursement

**Describe below**

Per member per month rate as described below.

**Describe any variations in payment based on provider qualifications, individual care needs, or the intensity of the services provided**

The hourly costs for each professional are based on the salary and benefit expectations for each classification and assumptions around the professionals' time spent on the specific service integration activities. Salary expectations were based on comparable salaries within the existing DHS payment structure.

- PCCM (description included in Service Delivery section)
- Risk Based Managed Care (description included in Service Delivery section)
- Alternative models of payment, other than Fee for Service or PMPM payments (describe below)

## Health Homes Payment Methodologies

MEDICAID | Medicaid State Plan | Health Homes | MN2024MS0001O | MN-24-0008 | Behavioral Health Homes

### Package Header

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<b>Superseded SPA ID</b>	MN-19-0015		
	User-Entered		

### Agency Rates

#### Describe the rates used

- FFS Rates included in plan
- Comprehensive methodology included in plan
- The agency rates are set as of the following date and are effective for services provided on or after that date

## Health Homes Payment Methodologies

MEDICAID | Medicaid State Plan | Health Homes | MN2024MS00010 | MN-24-0008 | Behavioral Health Homes

### Package Header

<b>Package ID</b>	MN2024MS00010	<b>SPA ID</b>	MN-24-0008
<b>Submission Type</b>	Official	<b>Initial Submission Date</b>	3/1/2024
<b>Approval Date</b>	N/A	<b>Effective Date</b>	1/1/2024
<b>Superseded SPA ID</b>	MN-19-0015		
	User-Entered		

### Rate Development

#### Provide a comprehensive description in the SPA of the manner in which rates were set

1. In the SPA please provide the cost data and assumptions that were used to develop each of the rates;
2. Please identify the reimbursable unit(s) of service;
3. Please describe the minimum level of activities that the state agency requires for providers to receive payment per the defined unit;
4. Please describe the state's standards and process required for service documentation, and;
5. Please describe in the SPA the procedures for reviewing and rebasing the rates, including:
  - the frequency with which the state will review the rates, and
  - the factors that will be reviewed by the state in order to understand if the rates are economic and efficient and sufficient to ensure quality services.

**Comprehensive Description** Effective for services provided on or after January 1, 2024, payment for BHH services is \$252.35 per member, per month. During the recipient's first six months of participation, the BHH will receive an enhanced payment rate of \$360.50 per member, per month. This enhanced payment will be made only once in each recipient's lifetime.

The Department made the following assumptions in developing the monthly payment rates for behavioral health home services:

- The population served by the BHH services management team will have the need for varying level of services depending on the severity of the population's behavioral health conditions and medical comorbidities. Recipients are assigned to one of twelve different classification groups based on their age (children vs. youths vs. adults), the level of their medical comorbidities (no significant comorbidities, one to two medical risk indicators, three or more indicators of medical risk) and, for adults, the relative severity of their behavioral health condition (SMI vs. SPMI). The average rate is based on an assumed distribution of recipient classification based primarily on the existing behavioral and medical risk distribution of the population eligible for the program.

- The anticipated cost built into the rate for each activity is based on the number of expected hours for each activity, the distribution of the professionals assumed to be executing the activity and the expected hourly cost associated with the employment of those professionals.

- The relative amount of time spent on each management activity is based on review of comparable services at the state and national level, and survey information collected from potential participating organizations and groups currently performing similar management activities.

- Additional hours are also expected during the initial six months of a recipient's BHH receipt of services to allow for additional BHH activities during program acclimation.

- The expectation of monthly cost related to service integration is reduced after the recipient's first six months of BHH services. Specifically, there will be lower expected need for ongoing management once recipients are engaged in the program, their health action plans have been developed and implemented, and they have become acclimated to the program and the activities surrounding their health action plan.

- The multi-disciplinary service integration team is expected to complete specific BHH services requirements each month. The relative time spent by each professional varies by activity (i.e. the anticipated team composition for each activity varies based on the professional requirements necessary to execute the activity).

Additional detail around the assumptions used to develop the rates include:

- The monthly tasks and hours expectations are also differentiated by their assumed frequency. Some services are expected to occur on a monthly basis, whereas others are only attributable to the initial engagement period (e.g. health action plan development) or would be incurred on an "as-needed" basis for a portion of the population (e.g. management of transitions of care). See below for highlights of the overall service integration requirements and the hourly assumptions for specific activities:

- Depending on recipient classification, the range of hours that it is anticipated that a BHH provider will spend on BHH services activities per month per recipient is 5 to 12.5 hours

- >A recipient with SMI with low medical risk is assumed to require an average of 5 hours of monthly service integration, while a recipient with SPMI with high medical risk is assumed to need an average of 12.5 hours of monthly service integration activities

- >Based on the expected distribution of recipients, the payment rate assumes an average of approximately 5.75 hours of monthly BHH activities.

- Beyond the initial health action plan development, each recipient's health action plan will be revised on a regular basis

and time is incorporated into the monthly rates for these annual or semi-annual activities.

-The hours of service per month are estimated based on anticipated activities to achieve the behavioral health home goals and needs of the recipients. BHHs will not be required to report monthly hours for the purpose of payment.

The rate was developed with the assumption of a team-based approach that allows for each team member to complete specific activities connected to the six core health home services and to work at the top of their license or qualifications. The rate is built upon the following caseload ratios:

- 1 FTE integration specialist for every 224 members
- 1 FTE systems navigator for every 56 members
- 1 FTE qualified health home specialist for every 56 members

The Department will allow a variance in the staffing ratios of up to 25 percent based on the needs and structure of the behavioral health home.

•The long-term staffing model assumes that new recipients (i.e. recipients requiring the management expectations used to develop the enhanced rate) will be 10% of the overall number of people receiving BHH services.

In order to receive a monthly PMPM payment, the BHH services provider must have personal contact with the person or the person's identified support at least once per month. The contact must be connected to at least one of the six required services linked to the person's goals in the health action plan. This contact may include face-to-face, telephone contact or interactive video. A letter, voicemail, email or text alone does not meet the requirement for monthly personal contact.

DHS will review BHH service rates at least every four years, as follows: DHS will review the Department of Labor prevailing wage for required team members, and average hours spent providing services; and will ensure that BHH rates are sufficient to allow providers to meet required certifications, training and practice transformation standards, staff qualification requirements, and service delivery standards.

# Health Homes Payment Methodologies

MEDICAID | Medicaid State Plan | Health Homes | MN2024MS0001O | MN-24-0008 | Behavioral Health Homes

## Package Header

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	User-Entered		

## Assurances

The State provides assurance that it will ensure non-duplication of payment for services similar to Health Homes services that are offered/covered under a different statutory authority, such as 1915(c) waivers or targeted case management.

**Describe below how non-duplication of payment will be achieved** Our MMIS system will prevent duplication of payment by preventing payment for the following services in the same month that a recipient receives behavioral health home services:

- assertive community treatment (ACT)
- youth assertive community treatment (Youth ACT)
- mental health targeted case management
- relocation services coordination
- targeted case management for persons not receiving services pursuant to a Section 1915(c) waiver who are vulnerable adults, adults with developmental disabilities, or adults without a permanent residence
- health care homes care coordination

Behavioral health home providers will refer recipients in need of ACT or Youth ACT services to a qualified provider of those services. The provision of BHH services will end once ACT/Youth ACT services commence.

Recipients of waiver services provided under § 1915(c) receive case management services to ensure access to services available under the waiver and to ensure effective utilization of these services. We will require BHH providers to coordinate service delivery with home and community based waiver case managers to ensure that no duplication occurs.

The state has developed payment methodologies and rates that are consistent with section 1902(a)(30)(A).

The State provides assurance that all governmental and private providers are reimbursed according to the same rate schedule, unless otherwise described above.

The State provides assurance that it shall reimburse providers directly, except when there are employment or contractual arrangements consistent with section 1902(a)(32).

## Optional Supporting Material Upload

Name	Date Created
No items available	

PRA Disclosure Statement: Centers for Medicare & Medicaid Services (CMS) collects this mandatory information in accordance with (42 U.S.C. 1396a) and (42 CFR 430.12); which sets forth the authority for the submittal and collection of state plans and plan amendment information in a format defined by CMS for the purpose of improving the state application and federal review processes, improve federal program management of Medicaid programs and Children's Health Insurance Program, and to standardize Medicaid program data which covers basic requirements, and individualized content that reflects the characteristics of the particular state's program. The information will be used to monitor and analyze performance metrics related to the Medicaid and Children's Health Insurance Program in efforts to boost program integrity efforts, improve performance and accountability across the programs. Under the Privacy Act of 1974 any personally identifying information obtained will be kept private to the extent of the law. According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0938-1188. The time required to complete this information collection is estimated to range from 1 hour to 80 hours per response (see below), including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to: CMS, 7500 Security Boulevard, Attn: PRA Reports Clearance Officer, Mail Stop C4-26-05, Baltimore, Maryland 21244-1850.

*This view was generated on 4/12/2024 10:29 AM EDT*