

SUD 1115

Demonstration Update

Angela Sparrow and Sherri Staley

Behavioral Health Specialists

Department for Medicaid Services, Division of Policy and Operations

What is the 1115 Demonstration?



Submitted Proposal

- A state submitted proposal that includes evidence-based ideas that are relevant to the dynamics and culture of the state. Proposals are designed to improve the integrity and effectiveness of the Medicaid program for beneficiaries.
- Submitted to federal government partners, CMS will evaluate and approve support of states to institute the demonstration.



Additional Flexibility

- Gives states additional flexibility to design and improve programs by testing different approaches as an important tool for continuous improvement.



Increased Focus

- Improving access to high-quality, person-centered services that produce better health outcomes for individuals, improve cost-effectiveness, and ensure sustainability long term, etc.

KY Medicaid's Overall Goals: 6 Milestones of the 1115

1

Access:

Access to Critical Levels of Care for OUD and Other SUDs

2

Evidence-based Criteria:

Use of Evidence-based, SUD-specific Patient Placement Criteria

3

National Standards:

Use of nationally recognized SUD-specific Program standards to set Provider Qualifications for Residential Treatment Facilities

4

Provider Capacity:

Sufficient Provider Capacity at Critical Levels of Care including MAT for OUD

5

Comprehensive Strategies:

Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and OUD

6

Improved Coordination:

Improved Care Coordination and Transitions between Levels of Care

Phase 1 Overview: 07/01/2019



Updated State Plan

Update to State Plan for Behavioral Health services.



BHSO Tiers

BHSO Tiers were implemented to eliminate need for dual licensures (BHSO & AODE)



Methadone Coverage

Methadone coverage for SUD treatment for the first time in KY Medicaid.



HF Modifier

HF modifier introduced in order to track SUD services for CMS reporting purposes.



General Updates

Update to some of the Medicaid behavioral health regulations:
907 KAR 15:005
907 KAR 15:010 & 907 KAR 15:015
907 KAR 15:020
907 KAR 15:022 & 907 KAR 15:025



IMD Exclusion

Waiver of IMD exclusion to increase covered days.

Behavioral Health Service Organization Tier System



BHSO Tier I

Mental Health treatment only continues to require BHSO licensure.



BHSO Tier II

Outpatient Substance Use Disorder (SUD) treatment requires the Outpatient Alcohol and Other Drug Entity (AODE) licensure.



BHSO Tier III

Residential Substance Use Disorder (SUD) treatment requires the Residential AODE licensure for each facility.

ALL TIERS MUST BE ENROLLED AS A BHSO PROVIDER TYPE. ALL TIERS STILL REQUIRE NATIONAL ACCREDITATION WITHIN ONE YEAR OF ENROLLEMENT.

Phase 2 – *Coming Soon!*

SUD 1115 Demonstration Phase 2

Phase 2

**Expected Completion:
04/01/2020**



Provisional Certification for Residential Providers



Adding residential/inpatient services for Chemical Dependency Treatment Centers



Adding ASAM criteria for Residential Crisis Stabilization Units treating SUD



Updating CMHC manual

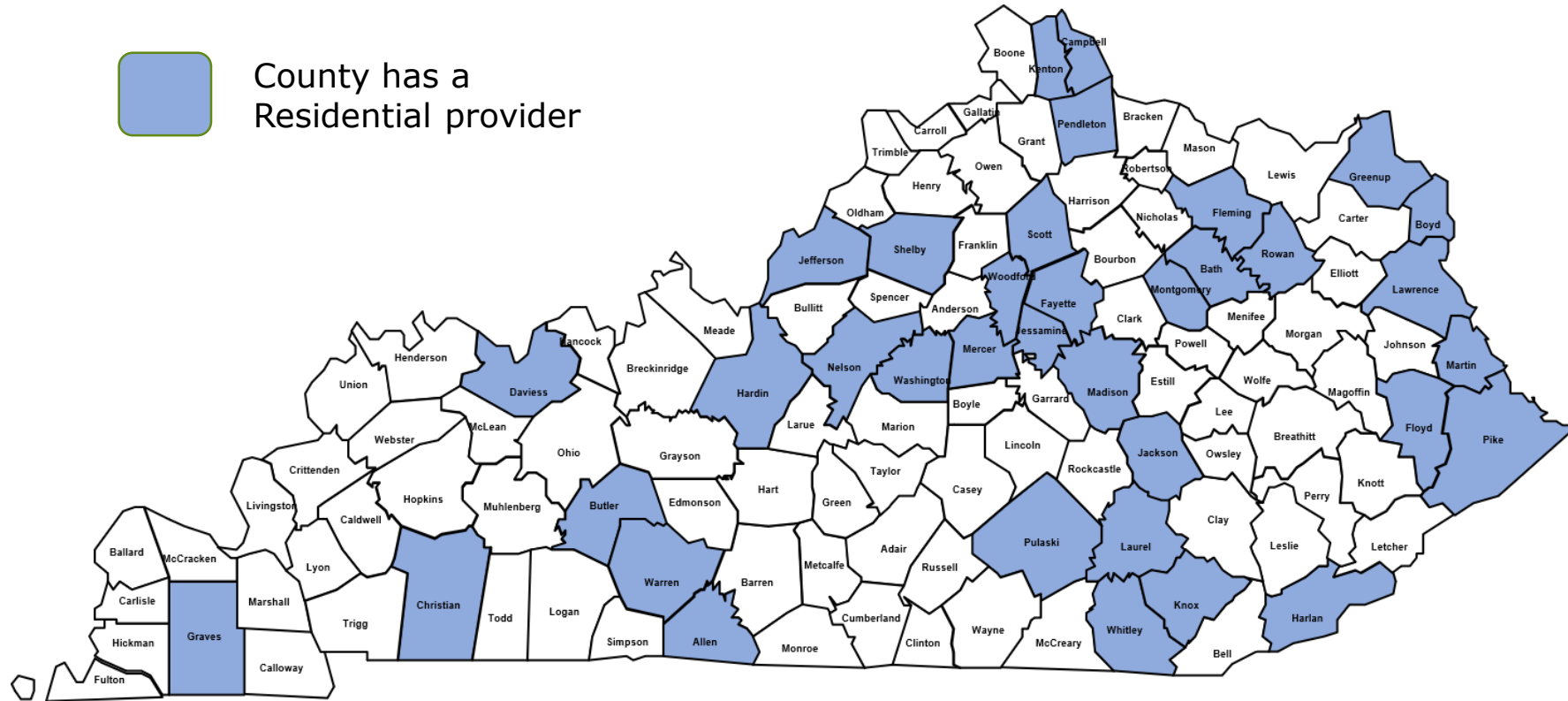


Regulation changes: CMHC, CDTC, RCSU



Enhanced rates for residential providers who complete attestation for ASAM Level of Care

Kentucky Residential Providers



Provisional Residential Certification

DMS Desk Audit

All completed attestation submissions will undergo a DMS BH Policy Team audit. Audit utilizes a tool outlining the ASAM criteria by residential levels.

Provisional Period

Allows time for providers to ensure that program standards meet ASAM criteria, more training opportunities,

Self Attestation

An attestation will be required for each enrolled facility and includes submitting the DMS approved attestation form, along with supporting documentation.

IMD Exclusion Waiver

If provisional certification is received, provider is eligible to receive a waiver of the IMD exclusion to provide up to 96 treatment beds.

Meeting the Standard

All SUD residential treatment facilities enrolled with Medicaid as a BHSO or CMHC will be required to obtain ASAM Level of Care Certification by July 1, 2021.

Enhanced Rates

Provisionally certified providers will receive an enhanced rate for residential services rendered during the provisional period.



Phase 2: Key Dates

11/15/2019
 Provisional Certification Attestation Opening Date

02/15/2020
 DMS Desk Audit Deadline

11/06/2019
 Provider Webinar

Webinar

Attestation Opening

Desk Audit

04/01/2020

 Provisional Certification Effective Date with Enhanced Rates

Provisional Certificate Effective

Attestation Closing

01/01/2020

 Submission Deadline for Provisional Certification

07/01/2021
 ASAM LOC Certification Deadline

ASAM Deadline ¹⁰

ASAM LOCs and Medicaid Provider Types

Level	Description	Examples of Service Delivery	KY Medicaid Provider Types
3.1 Clinically Managed Low-Intensity Residential Services	24 hour structure with available trained personnel; at least 5 hours of clinical service/week.	Halfway house, group home, or other supportive living environment (SLE) with 24-hour staff and close integration with clinical services.	<ul style="list-style-type: none"> • BHSO • CMHC
3.3 Clinically Managed Population-Specific High-Intensity Residential Services *This level of care not designated for adolescent populations	24-hour care with trained counselors to stabilize multidimensional imminent danger. Less intense milieu and group treatment for those with cognitive or other impairments unable to use full active milieu or therapeutic community.	Therapeutic Rehabilitation Facility or a Traumatic Brain Injury Program.	<ul style="list-style-type: none"> • BHSO • CMHC
3.5 Clinically Managed High-Intensity Residential Services	24-hour care with trained counselors to stabilize multidimensional imminent danger and prepare for outpatient treatment. Able to tolerate and use full active milieu or therapeutic community.	Therapeutic Community of variable length of stay with appropriately clinically trained staff; or a residential treatment center.	<ul style="list-style-type: none"> • BHSO • CMHC
3.7 Medically Monitored High-Intensity Inpatient Services	24-hour nursing with physician availability for significant problems in Dimensions 1,2, or 3. 16 hour/day counselor ability.	Adult: Inpatient Treatment center within the context of an acute care hospital or acute psychiatric unit. Adolescent: Inpatient or medical model residential treatment program.	<ul style="list-style-type: none"> • Upcoming! CDTC (develop inpatient criteria) • RCSUs providing SUD treatment

Opportunities for ASAM Training and Technical Assistance for Programs

KORE e-Trainings



https://www.changecompanies.net/account/register.php?reg_code=KORE2019

Contact Michelle Kilgore at michelle.kilgore@ky.gov

ASAM In-Person Trainings



Oct. 17-18th & Nov. 1st
Bowling Green

Nov. 1st & Nov. 14-15th
Hazard

Nov. 21-22nd-
Central Kentucky

Other Opportunities



Technical Assistance:

www.getSTR-Ta.org

American Society of Addiction Medicine (ASAM)

- <https://www.asam.org/>
- <https://www.asam.org/resources/level-of-care-certification>
- <https://www.asam.org/resources/level-of-care-certification/level-of-care-certification-faqs>

Contact us!

DMS.Issues@ky.gov

sherri.staley@ky.gov

angela.sparrow@ky.gov

(502)-564-6890



Questions?