

Recent Actions to Improve Access to Mental Health and Substance Use Disorder Treatment and Support Services

Center for Medicaid and CHIP Services
April 2024

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High Priority Objectives

- Improving Provider Network Adequacy
- Strengthening Parity Implementation
- Encouraging Innovation to Support Integration
- Increasing Access for Youth
- Supporting Maternal Health
- Expanding Crisis Response

Improving Provider Network Adequacy

- Managed Care and Access Rulemakings
 - Appointment wait time standards for outpatient MH/SUD, Primary Care, and OB/GYN
 - Secret shopper survey to validate performance
 - Analysis of payment rates compared to Medicare
- Similar network adequacy provisions in certain section 1115 demonstrations
- Highlighting importance of peer support providers as key members of care team

Strengthening Parity Implementation

- Most provisions of the Mental Health Parity and Addiction Equity Act of 2008 (MHPAEA) apply to Medicaid managed care organizations (MCOs), alternative benefit plans (ABPs), and the Children's Health Insurance Program (CHIP).
- CMS issued regulations in 2016 specifically focused on implementing the federal parity requirements for Medicaid MCOs, CHIP, and Medicaid ABPs.
- States must provide documentation of compliance when some benefits for enrollees are through MCOs
- With regard to CHIP, states are required to submit state plan amendments (SPAs) and documentation to demonstrate compliance with parity requirements.
- States are responsible for ensuring Medicaid ABPs are in compliance with parity requirements through a SPA process.
- **Request for Comments issued September 2023:**
<https://www.medicaid.gov/sites/default/files/2023-09/cmcs-mental-health-parity-092023.pdf>

Parity Request for Comments

- Questions for Comment include –
 - What are some model formats (e.g., templates) and key questions to consider for improving efficiency and effectiveness of review of documentation of compliance?
 - What processes are states and managed care plans using to determine whether coverage policies are comparable for MH or SUD compared to medical or surgical benefits?
 - What are key issues to focus on in reviewing policy/coverage documents that may indicate potential parity compliance issues including with non-quantitative treatment limits (NQTLs)?
 - Which NQTLs and/or benefit classifications should be prioritized for review? And what should be the criteria for identifying high priority NQTLs for review?
 - What are some measures or datapoints that could help identify potential parity violations in Medicaid managed care arrangements, Medicaid ABPs, and CHIP?

Encouraging Innovation to Support Integration

- Highlighting inter-professional consultation
- Supporting use of telehealth
- Encouraging states to support MH and SUD provider use of health information technology

Increasing Access for Youth

- **Engaging with States on Early and Periodic Screening, Diagnostic, and Treatment Requirements**
 - ❑ Guidance on importance of EPSDT for MH and SUD among youth
 - ❑ Reviews of state compliance, additional guidance, and report to Congress
- **Supporting Expanded School-Based Services**
 - ❑ Updated guidance on Medicaid coverage and claiming
 - ❑ Technical assistance center
 - ❑ Grants to states

Supporting Maternal Health

- Expanding coverage for one year post partum
- Intensive technical assistance via Improving Postpartum Care Affinity Group
- New CMS webinar series this summer and affinity group this fall on Addressing Maternal Mental Health and Substance Use

Mobile Crisis Team Funding

- **Enhanced Medicaid support for mobile crisis services**

- 85 percent federal match for expenditures on qualifying services for 12 fiscal quarters April 1, 2022 through March 31, 2027
- \$15 million in planning grants awarded to 20 states in September 2021
- State Health Official Letter* on how to implement mobile crisis intervention services that qualify for the increased federal match (issued Dec. 28, 2021)

- **18 states and DC approved so far:** OR, AZ, NC, NY, CA, WI, KY, DC, WV, MA, IN, WA, MT, AL, CO, NM, LA, VT, MD

*<https://www.medicaid.gov/federal-policy-guidance/downloads/sho21008.pdf>

Medicaid/CHIP and Behavioral Health Crisis Continuum

CMS and SAMHSA coordinating on --

- **New guidance to states** regarding Medicaid & CHIP financing for a range of crisis services
- **Technical assistance center** to help state Medicaid & CHIP programs design, implement, or enhance a continuum of crisis response services for children, youth, and adults
- **Compendium of best practices** for the successful operation of a Medicaid and CHIP continuum of crisis response services
- **Deadline of July 2025** to issue guidance and establish TA center

Center for Medicaid and CHIP Services Action Plan

- Overview of actions and initiatives recently completed and currently underway to improve access to and quality of treatment and support services for Medicaid and CHIP enrollees with mental health and substance use disorders
- Posted July 2023
- <https://www.medicaid.gov/medicaid/benefits/downloads/cmcs-mntl-helth-substnce-disrdr-actn-plan.pdf>

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