

Attachment 1: Examples of HSD's Response to Public Comments

Policy Area	Comments Received Related to Policy Area	HSD Response
Recommendations from MAC Subcommittee Members:		
Transition more care coordination activities to provider level	MAC Subcommittee Members and Multiple Providers	Added to Concept Paper and Draft 1115 Waiver Application
Target care coordination to high need, high cost members	MAC Subcommittee Members and Public Comment	Added to Concept Paper and Draft 1115 Waiver Application
Include high-fidelity, wraparound services for CYFD involved youth	CYFD	Added to Concept Paper and Draft 1115 Waiver Application
Implement a home visiting program	CYFD, Legislative Finance Committee (LFC), Disability Rights New Mexico (DRNM), Parents Reaching Out (PRO)	Pilot added to Concept Paper and Draft 1115 Waiver Application
Include school-based health centers as a partner to deliver care coordination activities	New Mexico Alliance for School-Based Health Care	Added to Concept Paper and Draft 1115 Waiver Application
Fund pre-release care coordination activities in jails/prisons	New Mexico Association of Counties	Added to Concept Paper and Draft 1115 Waiver Application
Support Community Health Representatives (CHRs) in the care coordination work they are conducting	IHS and Native American Technical Advisory Committee	Amended MCO Contracts to include opportunities for CHRs
Exempt Native American members from all cost sharing requirements being proposed	IHS and Native American Technical Advisory Committee	Added to Concept Paper and Draft 1115 Waiver Application

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Provide supportvie housing benefit	DOH, CYFD, Behavioral Health providers, MAC members	Added to Concept Paper, Draft 1115 Waiver Application and RFP MCO Contract
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Expand value-based purchasing efforts	NM Hospital Association, NM Coalition for Healthcare Value, multiple providers and MAC members	Added to Concept Paper, Draft 1115 Waiver Application and RFP MCO Contract
Request ongoing NF LOC approval for certain members	The Disability Coalition	Included in Draft 1115 Waiver Application
Increase the number of annual respite hours for caregivers	Parents Reaching Out	Added to Concept Paper and Draft 1115 Waiver Application
Allow for start up costs when members transition from Agency-Based model to Self-Direction	DRNM	Added to Concept Paper and Draft 1115 Waiver Application
Expand access to Institutions for Mental Disease (IMDs)	NM Hospital Association	Added to Concept Paper and Draft 1115 Waiver Application
Expand peer support specialists and youth peer support specialists	CYFD, DOH, NM Behavioral Health Planning Council, BH providers	Added to Concept Paper, Draft 1115 Waiver Application and RFP MCO Contract
Allow providers to charge a nominal fee for missed appointments	Providers	Added to Concept Paper, Draft 1115 Waiver Application and RFP MCO Contract

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Other Recommendations Included in the 1115 Draft Waiver Application		
Add Project ECHO partnership with Nursing Facilities for expert consultation to staff working with members with complex conditions	New Mexico Health Care Association (NFs)	Added to Draft 1115 Waiver Application
Exempt Individuals with Intellectual Disabilities from Proposed Co-Payments and Premiums	ARC of New Mexico	Added to Draft 1115 Waiver Application
Do not impose an age limit on Family Planning Benefit	Southwest Women's Law Center	Increased the age limit to up to age 51 in Draft 1115 Waiver Application
Add pilot for collaboration with Tribes to become Indian Managed Care Entities (IMCE) as defined in Section IV of the Federal Indian Health Care Improvement Act and 42 CFR section 438.14.	Navajo Nation and All Pueblo Council of Governors	Added to Revised Draft 1115 Waiver Application released on October 6, 2017
Adults in the Parent/Caretaker Category will lose Vision Benefits under the single adult plan	Multiple Public Comments	Added a Vision Benefit to the Single Adult Plan in the Draft 1115 Waiver Application
Exempt diabetes treatment from copayment requirements	Multiple Public Comments	Added to Draft 1115 Waiver Application

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Do not Eliminate Non-Emergency Medical Transportation in the single adult benefit package	Multiple Public Comments	Language to Eliminate was Removed in the Revised Draft 1115 Waiver Application released on October 6, 2017
Insufficient language regarding premium policies for the proposed premium structure	LHHS	Language Added in the Revised Draft 1115 Waiver Application released on October 6, 2017
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Do not include CHIP-covered children in the single benefit plan for adults	NM Center for Law and Poverty	Removed CHIP inclusion language in the Draft 1115 Waiver Application
Do not increase the requirement of number of activities of daily living (ADLs) needed to qualify for a nursing facility level of care from 2 to 3	Disability Coalition	Removed in Draft 1115 Waiver Application
2% of household income is too high for premium structure	Multiple Public Comments	Reduced to 1% of household income in Draft 1115 Waiver Application
Include an annual household premium as part of the premium structure	Multiple Public Comments	Added in Draft 1115 Waiver Application
Eliminate the proposal to request authority to use trusted data sources as the primary source of income verification when making an eligibility determination, when those sources are current	The Disability Coalition, Center on Law & Poverty, DRNM, New Mexico Voices for Children, APCG	Removed in Draft 1115 Waiver Application

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Eliminate consolidation of multiple eligibility categories within subpopulations to simplify administration of program	Multiple Public Comments	Removed in Draft 1115 Waiver Application
Eliminate the proposal to ensure parity for individuals to access LTSS by aligning eligibility requirements between Institutional Care determinations and MAGI determinations	Multiple Public Comments	Removed in Draft 1115 Waiver Application
The timeline for implementation of copayments through SPA process for 1/1/18 effective date is not sufficient time for providers to prepare	Multiple Providers	Added Copayment Requirements to Draft 1115 Waiver Application for 1/1/19 effective date
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Recommendations Being Implemented via MCO Contracts on 1/1/18:		
MCOs should employ housing specialists to assist Members with finding temporary or permanent housing	Bernalillo County	Added to MCO Contracts effective 1/1/18
Expand Value Based Purchasing requirements to include behavioral health providers	Behavioral Health Planning Council and BH providers	Added to MCO Contracts effective 1/1/18
Include Community Health Representatives for the MCO requirement to expand Community Health Workers	Native American Technical Advisory Committee (NATAC), Pueblo of Laguna, Cochiti Health Department	Added to MCO Contracts effective 1/1/18
Require MCOs to provide a Native American Care Coordinator, if requested by the Member	NATAC	Added to MCO Contracts effective 1/1/18
Add peer support specialists to the MCO requirement to expand Community Health Workers	Public comment	Added to MCO Contracts effective 1/1/18

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Add Crisis Triage Centers as a covered benefit	NM Association of Counties	Added to MCO Contracts effective 1/1/18
Recommendations Being Implemented via MCO Contracts on 1/1/19:		
Include options for partial delegation of care coordination including conducting assessments and coordination of services for community partners and providers such as PCMHs, SBHCs, CHWs, CHRs, etc.	MAC subcommittee and public comment	Added to the RFP MCO contract effective 1/1/19
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Add more requirements for dedicated care coordinators for high needs populations including justice involved, traumatic brain injury members, medically fragile members, individuals with intellectual disabilities, children and adults with special health care needs, members with housing insecurity needs and members with complex behavioral health needs	Public comment	Added to the RFP MCO contract effective 1/1/19
Require all MCOs to hire a supportive housing specialist	Bernalillo County, DOH, CYFD	Added to the RFP MCO contract effective 1/1/19
Add transition of care requirements to include members transitioning from a residential or institutional facility, foster care placement, released from incarceration or detention facility, discharging from a hospital, and discharging from out-of-home placements	MAC Subcommittee	Added to the RFP MCO contract effective 1/1/19

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Require assessments within 3 days after a transition from hospital or nursing facility to home and monthly member contact for 3 months to ensure continuity of care has occurred and the member's needs are met	Public comment	Added to the RFP MCO contract effective 1/1/19
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