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DEPARTMENT OF HEALTH AND HUMAN SERVICES

DIVISION OF HEALTH CARE FINANCING AND POLICY

Helping people. It's who we are and what we do.



Stacie Weeks,
JD MPH
Administrator

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Notice of Meeting to Solicit Public Comments and Intent to Act Upon Amendments to the State Plan for Medicaid Services

Public Hearing October 29, 2024 Summary

Date and Time of Meeting: October 29, 2024, at 10:02 AM

Name of Organization: State of Nevada, Department of Health and Human Services (DHHS), Division of Health Care Financing and Policy (DHCFP)

Place of Meeting: DHCFP
4070 Silver Sage Drive
Main Conference Room
Carson City, Nevada 89701

Teleconference and/or Microsoft Teams Attendees

(Note: This List May Not Include All Participants, Just Those Who Identified Themselves)

Casey Angres, DHCFP	Lauren M. Driscoll, Senior Deputy Attorney General
Wendy Messier, DHCFP	Theresa Carsten, DHCFP
Kimberly Adams, DHCFP	Marcel Brown, DHCFP
Antonio Brown, DHCFP	Kerisa Weaver, DHCFP
Lucille Wroldsen, DHCFP	Sarah Dearborn, DHCFP
Catherine Vairo, DHCFP	Ellen Frias-Wilcox, DHCFP
Melody Hoover, DHCFP	Lori Follett, DHCFP
Sean Linehan, DHCFP	Elissa Secrist, McDonald Carano
Evette Cullen, DHCFP	Janelle Sindt, Nevada Aging and Disability Services Division (ADSD)
De Yates	Brittany Acree, ADSD
Sabrina Schnur, Belz & Case	Elizabeth Scott, DHCFP
Jason Drake	Veronica Bean, DHCFP
Lisa Glick, Fidelis-Rx	Nhobelyn Kho, DHCFP
Jessica M. Stradford, Nevada Aging and Disability Services Division (ADSD)	Victoria Ramirez, Specialized Alternatives for Families and Youth (SAFY)
Kelly Carranza, DHCFP	Jacqueline McCoy, DHCFP
Christina Cobeo, DHCFP	Kerry Cosmidis, Accessible Space
Mary Bradley, DHCFP	Christy Nguyen, Fidelis-RX
Gina Ward, DHCFP	Bob
Rebecca Preddie	

Dominic Gaon, Anthem
Allison Genco Herzik
Gina Callister, ADSD
Concepcion Martinez, ADSD
Katie Pfister, ADSD
Vanessa Justice, Division of Welfare and Supportive
Services, DWSS
Serene Pack, DHCFP
Donna Cabrera, DHCFP
Jarod Wolsey, Apple Grove
Shannon Ivy, ADSD
Sheri Gaunt, DHCFP
Ellen Flowers, DHCFP
Kristin Pointon
Lea Case, Belz & Case
Jerry Kappeler, Accessible Space
Bonnie Palomino, DHCFP
Cade Grogan
Casey Walker Melvin
Kyle
Kurt Karst, DHCFP
Kelsey Avery, Scan Health Plan
Regina C. De Rosa, Anthem
Marshall Smith, PoolPact
Russell Steele, DHCFP
Rocio de la O Pena, ADSD
Brian Evans, The Perkins Company
Chris Doss
Shelly Benge-Reynolds, DHCFP
Tamiko Henderson
Charmaine Yeates, DHCFP

Don Boyle, Freedom Care
Patricia Schille, DHCFP
Michael Della, ADSD
Keith Benson, DHCFP
Melody Hall-Ramirez, DHCFP
Mandy Coscarart, DHCFP
Jeremey Hays, DHCFP
Areli Alarcon, Carrara Nevada
Gingi Robinson, DHCFP
Pablo Munoz, DHCFP
Chris Bosse, Renown
Joseph Filippi, Division of Health and Human Services
(DHHS)
Hilal Arshad, Elevance Health
Shauna Brennan, ADSD
Amy Levin, MD, Anthem
Danny Aldis, Revival Therapy
Jennifer Hailey, Carelon
Quang Nguyen, DHCFP
Deanna Torres, Community Counseling Center
Cissy Garic, DHHS
Amy Shogren, Black & Wadhams
Alisa Cadenhead, Anthem
Darlene Wolff, DHCFP
Melinda Rhoades, SAFY
Angela Stewart, Elevance Health
Shadi A. Ahmed, Carelon
Rianna White, Fidelis-Rx
Joy Thomas, Anthem

Introduction:

Casey Angres, Chief of Division Compliance, DHCFP, opened the Public Hearing introducing herself, Theresa Carsten, Deputy Administrator, DHCFP, and Lauren M. Driscoll, Senior Deputy Attorney General.

Casey Angres – The notice for this public hearing was published on September 26, 2024, in accordance with Nevada Statute 422.2369.

1. **Public Comments:** Casey Angres read a public comment (Please see attached).

Casey Angres also read a comment that was sent in from Casey Walker Melvin (Please see attached).

2. **Discussion of Amendments to the State Plan for Medicaid Services and Solicitation of Public Comments**

Subject: Increase rates for Occupational Therapy (OT) Services

Lucille Wroldsen, DHCFP, presented changes that DHCFP plans to submit a Medicaid State Plan Amendment (SPA) aimed at increasing the reimbursement rates for Occupational Therapy services Provider Type (PT 34). These amendments will affect State Plan Sections 4.19 B, Pages 2, 2 (Continued), and 2d. The proposed increases are designed to enhance compliance with the Access Rule and include a 10% increase in reimbursement rates for all Occupational Therapy services. A total 15% increase for Occupational Therapy services provided in rural areas. A total 15% increase for Occupational Therapy services delivered to youth with Serious Emotional Disturbance (SED) diagnosis codes via Telehealth.

There is an estimated increase in annual aggregate expenditures for State Fiscal Years (SFY) 2025 and 2026 to include an increase of:

SFY 2025	\$1,633,473
SFY 2026	\$3,472,407

The effective date of these changes is January 1, 2025.

Public Comments: There were none.

Casey Angres - Closed the Public Hearing for changes to the Increase rates for Occupational Therapy Services.

3. Discussion of Amendments to the State Plan for Medicaid Services and Solicitation of Public Comments

Subject: 1115 Demonstration Waiver Amendment “Nevada’s Treatment of Substance Use Disorders (SUDs) and Serious Mental Illness (SMI) Transformation Project”

Sarah Dearborn, Medical, Dental, and Behavioral Health Benefits Coverage Senior Chief, DHCFP, reported DHCFP has an approval for authority from the Centers for Medicare & Medicaid Services (CMS) for a five-year, Section 1115 Demonstration, hereinafter referred to as the “Demonstration” to expand statewide access to comprehensive behavioral health services for the most vulnerable Nevadans, including those with opioid use disorders (OUDs) and other substance use disorders (SUDs). Specifically, with this current Demonstration DHCFP has authority to provide a limited demonstration waiver of the federal Medicaid Institutions for Mental Diseases (IMD) exclusion. DHCFP is seeking to amend the Demonstration to provide a limited demonstration waiver of the IMD exclusion for adults with a Serious Mental Illness (SMI) and children with a Severe Emotional Disturbance (SED) as well as provide housing and nutrition supports as health-related social need (HRSN) services to eligible members.

This Demonstration is part of the State’s broader efforts to ensure access to a comprehensive continuum of Behavioral Health and HRSN services, in addition to the services in the SUD component of the Demonstration. This Demonstration amendment will ensure comparable access to IMDs for Medicaid and Children’s Health Insurance Program (CHIP) enrollees with SMI/SED as well as SUD, regardless of delivery system. Currently, managed care organizations (MCO) can provide up to 15 days of coverage as an in lieu of service for individuals with SMI residing in an IMD. However, individuals served via fee-for-service (FFS) do not have such access. This demonstration will provide coverage in an IMD for up to 30 days and eliminate the inconsistency between managed care and FFS coverage, to ensure comparability among delivery systems.

This Demonstration will further the objectives of Title XIX and Title XXI of the Social Security Act (SSA) by improving access to high-quality, person-centered services that produce positive health outcomes for individuals with SUD, SMI, and SED; and by advancing an innovative delivery system and payment models to strengthen provider network capacity and drive greater value for Medicaid. The Demonstration will not modify the State's current Medicaid program or CHIP outside of the benefits and reimbursement methodologies described within the application.

These proposed changes affect all Medicaid-enrolled providers delivering treatment and services to recipients with a SMI and children with a SED as well as services to address certain HRSN services. Those provider types (PT) include but are not limited to: Inpatient Psychiatric Hospital (PT 13), further PT development will be determined for those providers delivering HRSN services.

The projected enrollment and expenditures for each demonstration year are listed on the agenda and within the application, please review for specifics. For example, during demonstration year 2025 the estimated number of individuals served through this Demonstration waiver with the addition of these services is approximately 22,206 individuals costing close to \$148,000,000.

The effective date of these changes is upon CMS approval.

Public Comments: There were none.

Casey Angres - Closed the Public Hearing for 1115 Demonstration Waiver Amendment - Nevada's Treatment of Substance Use Disorders and Serious Mental Illness Transformation Project.

4. Adjournment

There were no further comments and Casey Angres closed the Public Hearing at 10:14 AM.

****A video version of this meeting is available through the DHCFP Compliance office. For more detailed information on any of the handouts, submittals, testimony and or comments please contact Jenifer Graham at documentcontrol@dhcp.nv.gov with any questions.***

From: [Danny Aldis](#)
To: [Document Control DHCFP](#)
Subject: Increase rates for OT Services
Date: Tuesday, October 29, 2024 10:33:26 AM

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I wanted to thank DHCFP for facilitating public comments in regards to raising PT 34 OT service rates. As an occupational therapist I want to advocate for these rate increases to take effect so that we can further match national reimbursement rates, which are currently at 2017 averages. These changes will facilitate more PT 34 Medicaid providers to enroll and allow for small businesses such as my own to be attractive options for therapists to provide quality services to Medicaid members who desperately need independence in daily living.

Thank you

Danny Aldis, OTR/L
Co-Owner Revival Therapy
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Fax: 702-944-5498
www.revivaltherapyvegas.com

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From: [Deanna Yates](#)
To: [Document Control DHCFP](#)
Subject: Public comment for State Plan Amendment - Increase rates for Occupational Therapy Services
Date: Tuesday, October 29, 2024 12:27:47 PM

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good morning...I was just on the State Plan Amendment - Increase rates for Occupational Therapy Services. My camera and microphone were not working so I posted my comment in the chat. They were kind enough to let me know that I needed to email my comment in as well. I have copied and pasted the exact comment below. Let me know if you have any questions. Have a great day---de

Since my camera and microphone aren't working on this laptop, I'd like to share my public comment here in the chat.

I want to express my gratitude for considering an increase in reimbursement for Provider Type 34 (occupational therapy). Provider Type 34 had not seen a rate change since the last decrease in 2017. Other provider types, such as Provider Type 60 and Provider Type 20, are offering the same services but are receiving higher Medicaid reimbursement rates. As a result, we face challenges in remaining competitive when it comes to therapist compensation. While we hope for a rate increase for all of Provider Type 34, starting with occupational therapy would be a significant step forward. Thank you once again for your consideration.

Deanna Yates, CMBS

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From: [Casey Melvin](#)
To: [Document Control DHCFP](#)
Subject: Public Comment: SPA 10.29.24
Date: Tuesday, October 29, 2024 10:16:34 AM

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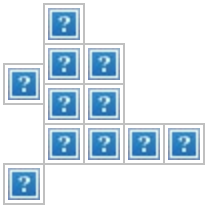
Good morning,

Please note of the following public comment regarding Increase rates for Occupational Therapy (OT) Services:

Thank you for making strides to address the reimbursement deficits outlined in the quadrennial rate review (QRR) data and bring PT 34 closer to other provider types of the same services. The QRR data published in 2022 identified a 335% reimbursement shortfall to costs associated with providing these services. It is most appreciated that efforts are being made between legislative sessions to help providers, ideally helping access to care issues in our state. While we do continue to see deficits and access to care concerns with the entire PT 34, including physical and speech therapy services, this is an important step of progress. There continues to be a lack of parity amongst PT 34, being reimbursed 10% less than PT 60 and PT 20 for the same services; however, the SPA proposal for a reimbursement increase for OT services is a great step forward for our provider type. Thank you for considering these requests and supporting providers in our community!

With deepest gratitude,

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