



To: The Governor's Advisory Council on Brain Injuries

From: LeAnn Moskowitz, LTSS Policy Program Manager
Medicaid, Bureau of Long-Term Services and Supports

Cc: Elizabeth Matney, Medicaid Director
Rebecca Curtiss, Medicaid Deputy Director of Operations
Paula Motsinger, Medicaid Long Term Services and Supports Policy Bureau Chief
Theresa Armstrong, HHS, Bureau of Community Services and Planning Bureau Chief

Re: Brain Injury Waiver and General Medicaid SFY24 Q2 Update

January 26, 2024

- I. PHE End - Returning to normal Medicaid Operations**
<https://hhs.iowa.gov/programs/welcome-iowa-medicaid/current-projects/medicaid-unwind>
 - Medicaid members are now required fill out renewal forms to determine if they are still eligible for Medicaid.
 - Medicaid providers are required to follow all Medicaid guidelines and regulations.

- II. Medicaid Member and Provider Town Halls**
<https://hhs.iowa.gov/programs/welcome-iowa-medicaid/public-meetings/town-halls>
 - **The first Thursday of the month (members only)**
 - **The third Thursday of the month (providers and members)**
 - ❖ Consumer Choice Option (CCO) Town Hall
February 19, 2024, 4:00pm-5:00pm

- III. HHS Systems Alignment** (combining IDPH and DHS under one agency)
<https://hhs.iowa.gov/initiatives/system-alignment>
 - [Assessment Report \(November 2023\)](#)
 - [Behavioral Health System Alignment \(January 2024\)](#)
 - [HHS System Alignment One Page Overview \(Updated 1-3-2024\)](#)

- IV. Health and Human Services Agency Dashboard, Iowa Medicaid Dashboard**
https://hhs.iowa.gov/dashboard_welcome



V. Molina Onboarding

- Began serving members July 1, 2023
- Beginning October 1, 2023, and until their next open enrollment period, members may only change MCOs for “Good Cause”.
- Provider Quick Reference Guide:
<https://hhs.iowa.gov/media/7599/download?inline=>

VI. American Rescue Plan Act (ARPA)2021

- Quarterly Spending Plan and Narratives and additional Information and the Spending Plan and Narratives are posted here: <https://dhs.iowa.gov/ime/about/initiatives/ARPA>
- Stakeholders can submit questions and comments to the ARPA mailbox.
ARPAHCBSPROJECTS@dhs.state.ia.us
- Housing Infrastructure Grant \$8.0M
 - Applications received: 63.
 - Amount Requested: \$30,677,439.00
 - Grant application reviews have been completed and are under consideration by HHS Director and Medicaid Director.
- Therapeutic Foster Home Pilot Project
- There is an active website for the Therapeutic Foster Home Grant project located at:
<https://hhs.iowa.gov/programs/CPS/foster-care-and-adoption/tfc>
 - Therapeutic Foster Care (TFC) Resource Guide and Toolkit which provides a description of Therapeutic Foster Care (TFC), information about roles and responsibilities, and the process to deliver TFC in Iowa.
 - There is alignment of services and service planning with Iowa Medicaid and its managed care partners, MHDSBHDS, education and others.
 - The Cedar Rapids, Iowa area was selected for the TFC pilot project.
 - Three foster family homes selected, trained, and approved to be TFC resource parents.



Iowa Medicaid

IOWA HHS

- Two foster family homes chosen and approved to be TFC Resource parents to complete training in March 2024.
- One foster family home selected to provide Respite to children in the TFC pilot.
- Four children referred; two children placed in two separate homes.

- LTSS Learning Management System Request for Proposal (RFP)
 - RFP Closed October 27, 2023.
 - Notice of Intent to Award Informational Letter 2532-MC-FFS
 - State chose Trualta.
 - Contract signed and work began in January.
 - User Training will occur late March.
 - User Go Live April 1, 2024

- Direct Service Job Board and Hiring Resource RFP
 - RFP Closed October 27, 2023.
 - No bids were received.
 - Dept. considering next steps.

- Hope and Opportunity in Many Environments (HOME)
 - <https://hhs.iowa.gov/programs/welcome-iowa-medicaid/current-projects/home>
 - HOMEtown Conversations occurred in 12 communities across Iowa to engage Iowans, share information and receive feedback about the waiver redesign effort to inform decision making. Public engagement was exceptional.
 - Attendance at the events included 659 in-person attendees, 19 legislators, and 300 written comments.



- HOMEtown recordings are online at: <https://hhs.iowa.gov/programs/welcome-iowa-medicaid/current-projects/home/hometown>
- Ongoing development of the future state of Case Management services including staffing ratios, standards, and competencies.
- Ongoing development of the proposed waiver design including target populations, eligibility criteria and service package development.
- Continued operational planning and launching of the Needs on Waitlists (NOW) survey.
 - Obtain information from the over 15,000 individuals on Iowa’s HCBS waiver waitlists.
 - Use the responses to assist HHS and Iowa Medicaid to help improve access to services and processes in the future.
- Identification of a universal assessment tool to be used for level of care for the redesigned waivers.
- Current Progress: <https://hhs.iowa.gov/ime/HOME/resources>

VII. BI Waiver Wait List

The Monthly Slot and Waitlist Summary, may be accessed here: <https://hhs.iowa.gov/media/7787/download?inline=>

Total on BI Waiver waitlist 01/08/2024: 3,195

Average wait for a funding slot: As of 01/08/2024: 6 years, 5 months, 29 days
SFY24 Q2 Slots released for the BI Waiver

Slots Released October 2023	13
Slots Released November 2023	9
Slots Released December 2023	45

VIII. BI Waiver Enrollment by Plan



SFY24	July 23	Aug 23	Sept 23	Oct 23	Nov 23	Dec 23
Amerigroup	644	682	680	680	691	683
Iowa Total Care	511	511	513	509	508	506
Molina Healthcare	151	105	96	94	96	96
Fee for Service (FFS)	143	143	143	141	144	143
Total Enrolled Members	1,449	1,441	1,432	1,424	1,439	1,429

IX. BI Waiver Level of Care

Persons who qualify for the BI waiver have sustained a traumatic brain injury and meet intermediate care facility (NF), skilled nursing facility (SNF), or intermediate care facility for the intellectually disabled (ICF/ID) level of care. The Admission Review data provided on the following table represents all new applicants to the HCBS BI Waiver. The Continued Stay Review data only represents the Fee-For Service Population. MCOs are responsible for completing the annual continued stay reviews for HCB Waiver members.

BI Waiver LOC								
Admission Reviews								
SFY24	Total Reviews	Denials		# Timely (95%/2 days)		# Timely (100%/5 days)		Appeals Recd
		#	%	#	%	#	%	
July	11	1	9.1%	11	100.0%	11	100.0%	1
August	13	4	30.8%	13	100.0%	13	100.0%	1
September	18	7	38.9%	18	100.0%	18	100.0%	0
October	14	2	14.3%	14	100.0%	14	100.0%	2
November	18	3	16.7%	18	100.0%	18	100.0%	1
December	11	4	36.4%	11	100.0%	11	100.0%	0
TOTAL	85	21	24.7%	85	100.0%	85	100.0%	5
Continued Stay Reviews								
SFY24	Total Reviews	Denials		# Timely (95%/5 days)		# Timely (100%/10 days)		
		#	%	#	%	#	%	
July	25	0	0.0%	25	100.0%	25	100.0%	
August	16	2	12.5%	16	100.0%	16	100.0%	
September	18	1	5.6%	18	100.0%	18	100.0%	
October	7	0	0.0%	7	100.0%	7	100.0%	
November	13	0	0.0%	13	100.0%	13	100.0%	
December	18	0	0.0%	18	100.0%	18	100.0%	
TOTAL	97	3	3.1%	97	100.0%	97	100.0%	
BI Waiver Admission Denials								
SFY24	No BI dx	Lack of info for dx	LOC not met & no dx	LOC not met	Technical Denial	Application Withdrawn	TOTAL	
July	1	0	0	0	0	0	1	
August	3	0	0	1	0	0	4	
September	5	0	2	0	0	0	7	
October	2	0	0	0	0	0	2	
November	1	0	0	0	0	2	3	
December	4	0	0	0	0	0	4	
TOTAL	16	0	2	1	0	2	21	

X. BI Waiver FFS Exceptions to Policy (ETP)

Members may request an exception to policy when their service needs cannot be met within the limits defined in administrative rule.

SFY 24	Year to Date 12/31/2023
Total BI Waiver FFS ETPs	28
Total BI Waiver MCO ETPs	21

XI. Community Based Neurobehavioral Rehabilitation (CNRS) 75 beds statewide.

Name	Location
Community NeuroRehab - Glen Oaks	Coralville
Community NeuroRehab - Oneida Point	Des Moines
Community NeuroRehab of Iowa - Auburn Hills	Coralville
Community NeuroRehab - Ashworth	West Des Moines
Community Neuro Rehab - Timberland	Ames
NeuroRestorative - Ankeny	Ankeny
NeuroRestorative - Cavalier	Sioux City
NeuroRestorative - Cedar Rapids	Cedar Rapids
NeuroRestorative - Dewitt	Dewitt
NeuroRestorative - Florence	Sioux City
NeuroRestorative - Iowa City	Iowa City
NeuroRestorative C Street	Cedar Rapids
Opportunities Unlimited - Oakshire	Sioux City
On With Life Residential Neuro Rehabilitation	Des Moines
Neuro RehabCare of Waterloo, LLC	Waterloo

XII. Workgroup Updates

CNRS Process Improvement

- Workgroup resumption TBD

BI Services Workgroup

- ACBI Service System Enhancement Task Force will be working to update or replace the BI Training Modules in preparation of the LMS to be launched later next year.



HCBS Innovations Workgroup

The overall objective of this workgroup is to engage in meaningful discussions that will generate innovative actionable solutions to enhance the ability of service providers to recruit and retain direct service professionals.

- .
- Met December 13, 2023
 - Presentation by Maria Walker with Polk Co Health Services
 - The NADSP E-Badge Academy, which offers Direct Support Professionals (DSPs) and Frontline Supervisors (FLSs) the ability to earn national certification through stackable electronic badges.

Next Meeting is scheduled for February 14, 2024

Residential Based Supported Community Living (RBSCL) Workgroup

The objective of the workgroup is to engage in solutioning that will minimize and remove the administrative burdens related to RBSCL provider qualifications and service delivery to expand the number of providers willing and able to deliver this service and increase the number of RBSCL settings across the state to meet the needs of children with complex behavioral needs that require placement outside the family home.

- Kick off meeting held November 8, 2023.
- Environmental scan of rules and regulations that are a barrier to service delivery.
- Profile submitted to the legislature to change the definition of SCL to aged 16 and older and under the scope of “Children’s residential facility exempt services provided through HCBS from licensure.

HCBS Strategic Framework Committee

The objective of this committee is to engage stakeholders and Medicaid policy in meaningful and actionable discussions to establish recommendations for a strategic framework for expanding, enhancing, and improving home and community-based services (HCBS) supported community living (SCL) services. In addition, this committee will address system gaps in service provision to meet needs of Medicaid recipients with complex behavioral health needs. The recommendations from this committee will be shared with HHS leadership to address in future round table and waiver redesign discussions.

- Met October 25, 2023, and January 24, 2024
- Next Meeting Scheduled for February 28, 2024

XIII. Legislative Reports

HHS legislative reports filed for General Assembly: 90 Session: I (01/09/2023 - 01/07/2024) may be found here.

<https://www.legis.iowa.gov/publications/otherResources/reportsFiled?r=true&ga=90&session=I>

The SFY2023 BI Waiver Expenditure Report is located here:

<https://www.legis.iowa.gov/docs/publications/DF/1441939.pdf>

XIV. HCBS Policy Changes, Waiver Amendments and Administrative Rule Changes

- Children’s Mental Health (CMH) and Elderly Waivers Renewals Effective Oct 1, 2023, approved by CMS December 22, 2023.
 - [Informational Letter 2519-MC-FFS Elderly Waiver Changes](#)
 - [Informational Letter 2518-MC-FFS CMHW Changes](#)
- HCBS Waiver Applications for AIDS/HIV, BI, ID, HD and PD Waivers and State Plan HCBS Habilitation Amendments adopting targeted Appendix (K) flexibilities submitted to CMS September 06, 2023, working through the Request for Additional Information (RAI) from CMS
- Permanently adopt COVID-19 PHE flexibilities
 - Allow the parent of a minor or spouse to be the paid caregiver for SCL, Individual Consumer Directed Attendant Care and Consumer Choice Option (CCO) in extraordinary circumstances.
 - Allow some services to be delivered via telehealth.
 - Medical Day Care for Children. This new service provides for the supervision and support of children residing in their family home who, because of their complex medical or complex behavioral needs require specialized exceptional care that cannot be served in the traditional childcare settings.
 - Adult Day Care has been newly expanded to be delivered in the member’s home to persons who need a degree of supervision and assistance on regular or intermittent basis in the home due to the absence of the primary caregiver. Supports provided during day care would be protective oversight, supervision, Activities of Daily Living (ADLs) and Independent Activities of Daily Living (IADLs). Included are personal cares (i.e.: ambulation, toileting, feeding, medications), behavioral support, or intermittent health-related cares, not otherwise paid under other waiver or state plan programs.



- Electronic signatures will continue to be appropriate when a pen and ink signature is not possible.
- Add Remote Supports and Host Home guidelines to the SCL service description.
- Add Enabling Technology to support the implementation of Remote Support
- Remove the limitation that prevents the immediate family member from being a direct support professional (DSP).
- Remove the age limitation on IMMT.
- Add an Emergency Needs Assessment process for Health and Disability, Physical Disability and Children's Mental Health Waivers.

XV. Training Opportunities

Training Registration and Archived Training Materials:

<https://hhs.iowa.gov/programs/welcome-iowa-medicaid/provider-services/provider-trainings/cbt>

XVI. Communication from Iowa Medicaid pertaining to HCBS

Informational Letters: <https://secureapp.dhs.state.ia.us/IMPA/Information/Bulletins.aspx>

Policy Clarifications:

<https://secureapp.dhs.state.ia.us/IMPA/PolicyClarifications/Bulletins.aspx>

XVII. OOS Placements

Adolescents and adults in OOS neurobehavioral rehabilitation facilities appear in the SNF numbers.



SFY '24 / December 23													
MEDICAID													
Out of State Placements													
CHILDREN		01/01/23	02/01/23	03/01/23	04/01/23	05/01/23	06/01/23	07/01/23	08/01/23	09/01/23	10/01/23	11/01/23	12/01/23
	Psychiatric Medical Institution for Children	13	20	19	20	19	20	21	24	26	22	22	24
	Skilled Nursing Facility	11	12	12	14	14	13	14	15	14	14	14	14
	Intermediate Care Facility for Persons with an Intellectual Disability	5	4	4	4	4	4	4	3	3	3	3	3
	Other Institutional	0	0	0	0	0	0	0	0	0	0	0	0
	Foster Group Care	14	16	16	16	16	13	12	11	12	11	14	14
	TOTAL CHILDREN: Medicaid	29	36	35	38	37	37	39	42	43	39	39	41
ADULTS		01/01/23	02/01/23	03/01/23	04/01/23	05/01/23	06/01/23	07/01/23	08/01/23	09/01/23	10/01/23	11/01/23	12/01/23
	Psychiatric Medical Institution for Children	2	2	2	2	3	3	2	3	3	3	3	3
	Skilled Nursing Facility	56	58	58	56	55	55	54	55	56	56	57	55
	Intermediate Care Facility for Persons with an Intellectual Disability	3	3	3	3	3	3	2	2	2	2	2	2
	Nursing Facility	0	0	0	0	0	0	0	0	0	0	0	0
	Other Institutional	0	0	0	0	0	0	0	0	0	0	0	0
	TOTAL ADULT MEDICAID	61	63	63	61	61	61	58	60	61	61	62	60
Out of State Placements		01/01/23	02/01/23	03/01/23	04/01/23	05/01/23	06/01/23	07/01/23	08/01/23	09/01/23	10/01/23	11/01/23	12/01/23
	Foster Group Care	14	16	16	16	16	13	12	11	12	11	14	14
	MEDICAID (children)	29	36	35	38	37	37	39	42	43	39	39	41
	TOTAL CHILDREN: Foster Group Care & Medicaid	43	52	51	54	53	50	51	53	55	50	53	55
	TOTAL ADULTS: Medicaid	61	63	63	61	61	61	58	60	61	61	62	60
GRAND TOTAL		104	115	114	115	114	111	109	113	116	111	115	115