



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 Q3 Update

April 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 Town Hall

Meeting: Consumer Choice Option (CCO) Town Hall

Date: May 20, 2024

Time: 4:00 p.m. - 5:00 p.m. CST

Presenter: Christy Casey, Iowa Medicaid Program Policy Manager

Sign-Up Here:

<https://www.zoomgov.com/meeting/register/vJltdOuhrjojGzCZtRiCkuRk2QOJhnwxK7Q#/registration>

- [New CCO Town Hall Registration Process](#)



III. HHS Systems Alignment (combining IDPH and DHS under one agency)

<https://hhs.iowa.gov/initiatives/system-alignment>

- [Behavioral Health System Alignment](#) (February 2024)
- [Behavioral Health Service System Bill Townhall](#) (February 2024)
 - [Townhall PPT Slides](#)
- [Behavioral Health Service System and Disability Services Transition Timelines](#)

IV. Health and Human Services Agency Dashboard, Iowa Medicaid Dashboard

https://hhs.iowa.gov/dashboard_welcome

V. Open Choice (MCO and Dental Plan Enrollment)

After a member has been with an MCO or dental plan for 12 months, they may change their MCO or dental plan for any reason during their annual Open Choice period.

<https://hhs.iowa.gov/programs/welcome-iowa-medicaid/iowa-health-link/open-choice>

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

ARPA Project Status

The table below provides the status of each ARPA project, the amount budgeted, the amount expended and the amount remaining to date.

Project	Status 04/02/25
Provider Training Platform (LMS)	<ul style="list-style-type: none"> • Free to all Iowans. • Includes a learning library with a wide range of topics related to the provision of care and the needs of caregivers. • Includes the LTSS Competency Based Training archived sessions.



	<ul style="list-style-type: none">• For all types of Caregivers including LTSS providers, case managers, direct support professionals, and family caregivers.• LMS Go Live 05/01/24*• LMS Training See Informational Letter 2570-MC-FFS <p>Complete Guide to Iowa HHS Training Platform Presented by: Kunal Parikh and Kirby Corbey at Tualta When: Pick a session below and register for the virtual session https://activate.tualta.com/ltss-iowa</p> <p>May 1, 2024 9:00 AM – 10:00 AM CT May 2, 2024 3:00 PM – 4:00 PM CT May 3, 2024 12:00 PM – 1:00 PM CT</p>
Behavioral Health, Aging, and Disability Services System Evaluation (Study)	<ul style="list-style-type: none">• Project Closed• Funds transitioned to HOME Project
HOME Project	<ul style="list-style-type: none">• Domains 1-4 2024 Q3 tasks in process• NOW Survey in process• Waiver Redesign Concept Paper is out for public feedback.• Listening Sessions Scheduled: Provider Listening Session Details: Date: Tuesday, May 7 Time: 10:30-12 PM CST Register for the provider listening session by May 3 Member Listening Session 1 Details: Date: Monday, May 6 Time: 1:30-3 PM CST Register here by May 2 Member Listening Session 2 Details: Date: Thursday, May 9 Time: 5-6:30 PM CST Register here by May 7
Development Grant – Therapeutic foster home pilot.	<ul style="list-style-type: none">• Pilot in process• 5 families / 4 children



	<ul style="list-style-type: none"> • 3 licensed Respite families • Crisis service/ Training contract in place • SPA pending a legislative decision on increased rates for youth in foster care
Direct Support Employment Network and Hiring Resource	<ul style="list-style-type: none"> • RFI issued. • RFP issued, zero responses. • Closed due to time remaining to expend the state share of ARPA funds. • Funds transferred to unallocated funds.
Health IT and Infrastructure Grant Program, includes 2022 HIT & I grant and the 2023 Housing Infrastructure Grant	<p>HIT & I Grant.</p> <ul style="list-style-type: none"> • \$24,096,828.32 • 144 HCBS providers • Closed <p>Housing Infrastructure Grant</p> <ul style="list-style-type: none"> • \$13,026,024.07 • 53 HCBS Providers • Closed
Expand Remote Support through HCBS Provider Technology grants	<ul style="list-style-type: none"> • \$ 3,295,183 • 31 HCBS Providers • Closed
One Time Recruitment/Retention Provider Payments	<ul style="list-style-type: none"> • \$113,675,866 • \$3922.00 per FTE • 28,981 HCBS FTEs • Closed
HCBS Employee Training and Scholarship Grant Program	<ul style="list-style-type: none"> • \$ 5,104,489 • 85 HCBS Providers
ID Waiver Waitlist Buydown	<ul style="list-style-type: none"> • 350 funding slots to the Point in Time (PIT) number approved in the waiver • \$4,972,455 for FFY24Q3 to coverage any overage on the ID waiver budget



HCBS Rate Increases	<ul style="list-style-type: none"> SFY23 4.25% Across the board rate increase for HCBS Habilitation and HCBS Waivers SFY24 continued funding to retain the rate increase
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VII. BI Waiver Wait List

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

Average wait for a funding slot: As of 04/08/2024: 6 years, 5 months, 26 days

SFY24 Q3 Slots released for the BI Waiver

Slots Released January 2024	26
Slots Released February 2024	28
Slots Released March 2024	14

VIII. BI Waiver Enrollment

See the [Medicaid Dashboard](#), click on **Waiver** on the right side of the page.

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
January	13	0	0.0%	13	100.0%	13	100.0%	0
February	14	3	21.4%	14	100.0%	14	100.0%	0
March	35	5	14.3%	35	100.0%	35	100.0%	1
TOTAL	147	29	19.7%	147	100.0%	147	100.0%	6

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%	
January	28	0	0.0%	28	100.0%	28	100.0%	
February	21	0	0.0%	21	100.0%	21	100.0%	
March	13	0	0.0%	13	100.0%	13	100.0%	
TOTAL	159	3	1.9%	159	100.0%	159	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
February	1	0	0	0	0	2	3
March	4	0	0	0	0	1	5
TOTAL	21	0	2	1	0	5	29



BI Waiver CSR Denials				
SFY24	Lack of info	LOC not met	Technical Denial	Total
August	0	2	0	2
September	0	1	0	1
TOTAL	0	3	0	3

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. The majority of ETPs during this quarter were related to the member not accessing one unit of HCBS during a calendar quarter to remain eligible for the HCBS BI Waiver.

SFY24Q3	
Total BI Waiver FFS ETPs	75
Total BI Waiver MCO ETPs	92

XI. Community Based Neurobehavioral Rehabilitation (CNRS) 80 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 I	Waterloo
Neuro RehabCare of Waterloo, LLC II	Waterloo

XII. Workgroup Updates

HCBS Innovations Workgroup will meet again in June 2024.

Residential Based Supported Community Living (RBSCCL) Workgroup

The objective of the workgroup is to engage in solutioning that will minimize and remove the administrative burdens related to RBSCCL provider qualifications and service delivery to expand the number of providers willing and able to deliver this service and increase the number of RBSCCL 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.
- Legislature appropriated targeted funding for RBSCCL to assist with capacity building.

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, February 28, 2024
- Addressing capacity

XIII. Federal Changes impacting HCBS

[Ensuring Access to Medicaid Services Final Rule \(CMS-2442-F\) Applicability Date Chart](#)



XIV. Legislative Session

HHS Appropriations HF 2698

HHS Budget Highlights:

- \$14,600,000 for HCBS provider rate increases
- \$5,000,000 for enhanced case management services for long term services and supports members.
- \$1,700,000 for HCBS ID Waiver slots increase.
- \$3,000,000 for home health rate adjustment
- \$369,000 for a half a year of PMIC rate adjustments and \$3 million to recruit and out of state PMIC to accept the most complex youth.
- \$1,352,750 for residential based supported community living rate increase
- \$250,000 for air ambulance rate increase
- \$2,104,186 for behavioral health rate increases. This gets BH provider rate increases to the 85% of the benchmark.
- \$500,000 to increase the pharmacy dispensing fee.
- \$308,765 to increase foster care rates for families (5% increase)
- \$148,232 to increase adoption subsidy rates for families (5% increase)
- \$334,500 for the Preparation for Adult Living Program
- \$2,053,006 for the State Training School
- \$3,515,834 for Cherokee Mental Health Institute
- \$4,104,809 for Independence Mental Health Institute
- \$629,140 for Woodward Resource Center
- \$2,890,060 for Civil Commitment Unit for Sex Offenders
- \$1,000,000 for training and supervisor ratio improvement
- \$3 million to fund 988 from the incentive fund for FY25.

Bill Number	Topic	Status	Division
HF 2673	Behavioral Health Bill	TO GOVERNOR	Behavioral Health Aging & Disability
SF 2251	12 Months of Postpartum Medicaid Coverage	TO GOVERNOR	Community Access & Eligibility Medicaid
HF 2402	PMIC Bill	TO GOVERNOR	Medicaid Family Well Being & Protection
SF 2385	Boards & Commissions	TO GOVERNOR	ACROSS AGENCY COLLABORATION



HF 2698	HHS Appropriations Bill	TO GOVERNOR	ACROSS AGENCY COLLABORATION
HF 2404	HHS Prefile: Omnibus	SIGNED	ACROSS AGENCY COLLABORATION
SF 2285	HHS Prefile: Streamline Legislative Reports	SIGNED	ACROSS AGENCY COLLABORATION
HF 2658	Child Care Investments and Pilot Extension	TO GOVERNOR	Family Well Being & Protection
HF 2605	Consumable Hemp	TO GOVERNOR	Compliance
SF 2395	Opioid Settlement Distribution	IN THE HOUSE	Behavioral Health
SF 2252	More Options for Maternal Support	SIGNED	Family Well Being & Protection

XV. 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>

XVI. HCBS Policy Changes, Waiver Amendments and Administrative Rule 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
- HCBS Waiver amendments approved 04/23/2024.
- 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.
- Updated

XVII. Training Opportunities

Training Registration and Archived Training Materials:

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

Consumer Choice Option (CCO) Budgets

May 16, 2024, | 11:00 AM – 12:00 PM CT |

Virtual Registration through [Zoom](#)

Dual Diagnosis

May 29, 2024, | 1:00 – 2:00 PM CT |

Virtual Registration through [Zoom](#)

XVIII. 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>



XIX. OOS Placements

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



SFY '24 / March 2024													
MEDICAID													
Out of State Placements													
		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	01/01/24	02/01/24	03/01/24
CHILDREN													
	Psychiatric Medical Institution for Children	20	19	20	21	24	26	22	22	24	25	27	31
	Skilled Nursing Facility	14	14	13	14	15	14	14	14	14	14	13	12
	Intermediate Care Facility for Persons with an Intellectual Disability	4	4	4	4	3	3	3	3	3	3	4	4
	Other Institutional	0	0	0	0	0	0	0	0	0	0	0	0
	Foster Group Care	16	16	13	12	11	12	11	14	14	13	13	15
	TOTAL CHILDREN: Medicaid	38	37	37	39	42	43	39	39	41	42	44	47
ADULTS													
	Psychiatric Medical Institution for Children	2	3	3	2	3	3	3	3	3	3	3	4
	Skilled Nursing Facility	56	55	55	54	55	56	56	57	55	54	52	54
	Intermediate Care Facility for Persons with an Intellectual Disability	3	3	3	2	2	2	2	2	2	2	2	1
	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	61	61	58	60	61	61	62	60	59	57	59
Out of State Placements													
	Foster Group Care	16	16	13	12	11	12	11	14	14	13	13	15
	MEDICAID (children)	38	37	37	39	42	43	39	39	41	42	44	47
	TOTAL CHILDREN: Foster Group Care & Medicaid	54	53	50	51	53	55	50	53	55	55	57	62
	TOTAL ADULTS: Medicaid	61	61	61	58	60	61	61	62	60	59	57	59
GRAND TOTAL		115	114	111	109	113	116	111	115	115	114	114	121