

**MEMORANDUM**

TO: Tommi Potter, Ohio Department of Medicaid

FROM: Sophia Papadimos, Regulatory Policy Assistant

DATE: August 7, 2015

RE: **CSI Review – Health Home Eligibility and Rates (OAC 5160-27-02 and 5160-27-05)**

On behalf of Lt. Governor Mary Taylor, and pursuant to the authority granted to the Common Sense Initiative (CSI) Office under Ohio Revised Code (ORC) section 107.54, the CSI Office has reviewed the abovementioned administrative rule package and associated Business Impact Analysis (BIA). This memo represents the CSI Office's comments to the Agency as provided for in ORC 107.54.

Analysis

This rule package consists of two amended rules being proposed by the Ohio Department of Medicaid (ODM). The proposed rules outline coverage and limitation policies for community mental health services, including health home services, which are administered by the Ohio Department of Mental Health and Addiction Services (OhioMHAS). Health home services are a coordinated, person-centered system of care, meant to assist adults and children with Severe and Persistent Mental Illness (SPMI) and Severe Emotional Disturbance (SED). The rule package was submitted to the CSI Office on July 13, 2015 and the public comment period was held open through July 20, 2015. No comments were received during this time.

Proposed amendments will allow people who do not meet certain eligibility criteria to be able to continue to receive services from the health home in which they are currently enrolled. This amendment is based on discussions between ODM, OhioMHAS, the Governor's Office of Health Transformation, and providers. OAC 5160-27-05 currently states that rates would be reduced by

ten percent for the period of July 1, 2014 through June 30, 2015. The rule is being amended to keep the ten percent reduction indefinitely, removing the need to reevaluate as of July 2015.

ODM explains the adverse impact as the time for providers to develop a fee schedule and the time involved in filling out the appropriate paperwork when disenrollment occurs. No comments were received that the requirements are overly burdensome. Therefore, after reviewing the proposed rules and associated BIA, the CSI Office has determined the purpose of the rules is justified.

Recommendation

For the reasons explained above, this office does not have any recommendations regarding this rule package.

Conclusion

Based on the above comments, the CSI Office concludes that the Ohio Department of Medicaid should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.