

Summary: SUD Mid-Point Assessment Review. Human Services Department (HSD) response to CMS follow up email received September 9, 2023.

CMS reviewed the SUD Mid-Point Assessment (MPA), submitted on June 28, 2022. CMS appreciates New Mexico’s commitment to robust monitoring of its demonstration and the thorough approach taken by the state and its contractor to assess the demonstration’s progress, and we would like to offer the following feedback.

Overall, we are pleased that the metrics are showing progress the state has made through this demonstration so far, and we hope to see this continue. However, we are concerned about the implementation action items the report indicated haven’t been completed and request that the state provide updates, timelines, and additional information (as warranted) for addressing each:

Milestone 1: Access to critical levels of care for OUD and other SUDs, Five action items were incomplete.

Action:	HSD Response
<ul style="list-style-type: none"> • Add SUD to beneficiary eligibility criteria for CLNM health homes through a State Plan Amendment (SPA) and rule which includes all OUD/SUD screening. 	<p>The state submitted SPA 21-0005 SPA to add SUD beneficiary eligibility criteria for CLNM health homes. The SPA was approved on February 15, 2021 with an effective date of January 1, 2021. This change has been updated in the revised CLNM Health Home manual available on the HSD website at CLNM-POLICY-MANUAL-FINAL-081121.pdf (state.nm.us). HSD is in the process of amending the New Mexico Administrative Code. In the interim Human Services Department (HSD) will implement this change through a Provider Supplement issued in May 2023.</p>
<ul style="list-style-type: none"> • Process and add new OTPs as they apply 	<p>Provider enrollment is an ongoing activity that will continue. The NM State Opioid Treatment Authority (SOTA) worked closely with two new OTP applicants in the past year to complete the application process. Elite Methadone in Las Cruces, NM opened its doors in February of 2023 and Empower Clinic in Socorro, NM anticipates opening in August of 2023. Both new providers are committed to pursuing service delivery in surrounding frontier and rural counties through Medication Units or potentially mobile clinic services. Further, BHSD is working directly with an established Albuquerque-based OTP who is preparing to offer a Medication Unit option in Gallup, NM. Without an OTP in that community, Gallup residents living with Opioid Use Disorder often must travel to Albuquerque for services and would be more appropriately served with access to medication in their home community. Lastly, utilizing the federal State Opioid Response (SOR) grant, in collaboration with UNM Opioid Hub team, several OTPs receive funding to support expanded hours at their clinics, in order to expand access and better serve individuals and their families. In addition, the state is currently in process of increasing provider rates specific to Maternal Health, Primary Care, and Behavioral Health services up to 120% of Medicare rates.</p>

<ul style="list-style-type: none"> • Conduct an analysis for result on calendar year (CY) 1 activities related to availability of providers for OP services in all regions of the state, including MAT, telemedicine, and after-hours access. 	University of New Mexico is conducting this analysis and expected completion is June 2024.
<ul style="list-style-type: none"> • Conduct an analysis of available programs for all applicable age levels across the state. 	University of New Mexico is conducting this analysis and expected completion is June 2024.
<ul style="list-style-type: none"> • 2.5 Partial Hospitalization action 27: work with hospitals to add this service. 	Provider outreach and enrollment is and ongoing activity that will continue. To ensure access to high-quality care for Medicaid members through appropriate reimbursement of health care service as well as to attract and retain healthcare providers the state is in the process of increasing rates specific to Maternal Health, Primary Care, and Behavioral Health services up to 120% of Medicare rates and in other service areas up to 100% of Medicare rates.
<ul style="list-style-type: none"> • Develop a report that shows the average length of stay for adult ARTCs across the state. LOS will be specific for each of the 3 levels of care within an ARTC. 	HSD-Behavioral Health Services Division (BHSD) created and implemented this report in November of 2022. This report is currently in use by the division.

Milestone 2: Widespread use of evidence-based, SUD-specific patient placement criteria.

One action item was incomplete.

Action:	HSD Response
<ul style="list-style-type: none"> • Conduct an independent evaluation of placement criteria and utilization management for all level of ARTCs. 	BHSD reviewed this action item and will to conduct an alternative analysis that measures return on investment adding ARTC Providers to the Medicaid Plan. Expected completion is June 2024.

Milestone 3: Use of nationally recognized, evidence-based SUD program standards to set residential treatment provider qualifications.

One action item was incomplete.

Action:	HSD Response
<ul style="list-style-type: none"> • Develop on-site audit tool for ARTCs to ensure placement, staffing, service standards and placement criteria meet ASAM criteria. This will be conducted every two years. 	BHSD has a draft tool in place and is under review by BHSD leadership. Expected implementation is December 2023 or sooner.

Milestone 5: Implementation of comprehensive treatment and prevention strategies to address opioid abuse and OUD.

One action item was marked as “suspended” with no additional context.

Action:	HSD Response
<ul style="list-style-type: none"> • Continue and expand PAX Good Behavior Game 	<p>This item was incorrectly identified as suspended. This activity is currently ongoing. BHSD, Office of Substance Abuse Prevention (OSAP) offers the PAX Good Behavior Game packaged training opportunity to 15 new elementary school districts/tribal community sites across New Mexico every year while maintaining the current 22 sites. OSAP supports teacher training, classroom materials, manuals, and partner training contracted through the program developer, PAXIS Institute. OSAP continues to provide on-going mentoring through coaches working with local site-based partners providing workshops and data collection as well as Professional Learning Communities with teachers and school administrators contracted through Coop Consulting. OSAP supports the PAX Dream Makers Youth Gathering; a youth-led approach, which empowers youth to create Peace, Productivity, Health, and Happiness through co-developing and implementing action plans for the participants and their community. Additionally, with a vision to start primary prevention at a younger age OSAP is putting forward the opportunity to work with 6 new tribal Head Start programs with a focus on 3-5-year-olds, parents, and community members.</p>

Milestone 6: Improved care coordination and transitions between levels of care.

Six actions items suspended.

Action:	HSD Response
<ul style="list-style-type: none"> • Solicit potential providers in 13 targeted counties. • Evaluate potential health home applications • Educate applicants in health home requirements and provision of additional services expected • Develop reimbursement per facility • Activate health homes in 13 counties • Repeat above steps and activate all remaining counties for health homes 	<p>The state suspended six of the seven outstanding action items because it reprioritized its focus away from health homes and towards certified community behavioral health clinics (CCBHCs). HSD received a SAMHSA CCBHC planning grant in February 2023.</p> <p>There are six targeted pilot sites in 6 counties (Bernalillo, Dona Ana, Curry, Eddy, Santa Fe, Sandoval)</p> <p>Target population is adults with SMI, children with SED, and those with long term and serious substance use disorders, as well as others with mental illness and substance use disorders. Priority populations include veterans, American Indians, and Hispanic populations.</p> <p>BHSD will conduct stakeholder meetings to include the existing Health Home providers, advocacy groups, and partners to provide information and answer questions on</p>

	<p>the steps the State has taken toward implementation of CCBHCs and the reasons for moving away from the health home model.</p> <p>Care coordination continues under the CCBHC model. Both full and shared delegation care coordination are included as part of the States Managed Care program.</p> <p>CCBHC will be included in a state plan amendment and include all nine required CCBHC services: Crisis mental Health Services, Screening Assessment & Diagnosis, Patient Centered Treatment Planning, Outpatient mental Health and SUD Services, Outpatient Primary Care Screening a& Monitoring, Targeted Case Management, Psychiatric Rehabilitation Services, Peer Support Counseling and Family Support, Intensive Mental HealthCare for those in the Military.</p> <p>The identified six pilot CCBHC sites cover all four quadrants of NM and serve rural and underserved communities.</p> <p>During the planning year, the state will work with selected sites to prepare for CCBHC certification by supporting them to participate in the needs assessment and helping them to apply findings.</p> <p>The state will support training and technical assistance on the aforementioned topics such as assessing gaps in staffing and services, building partnerships and formal relationships, implementing EBPs with fidelity, meaningful consumer input, care coordination, performance measurement and reporting, continuous quality improvement, and implementing and optimizing Health Information Technology Structure (HIT).</p> <p>The state intends to utilize the CC PPS 1 rate-setting methodology and select utilization and cost data from its Omnicaid Medicaid Management Information System (MMIS) system for members enrolled in the fee-for-service program, as well as encounter data from its managed care program for CCBHC services.</p> <p>Entire plan is available upon request.</p>
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