



Susana Martinez, Governor
Brent Earnest, Secretary
Nancy Smith-Leslie, Director

November 16, 2015

RE: Tribal Consultation Letter 15-21: 8.310.10 NMAC Health Home Services (CareLink NM) Promulgation

Dear Honorable

Consultation with New Mexico's Indian Nations, Tribes, Pueblos and their healthcare providers is an important component of the government-to-government relationship with the State of New Mexico. In accordance with the New Mexico Human Services Department's (HSD) Tribal Consultation requirements, this letter is to inform you that HSD, through the Medical Assistance Division (MAD), is accepting written comments through December 16, 2015, for proposed new services, 8.310.10 Health Home Services (CareLink NM), to be included as part of the New Mexico Administrative Code (NMAC). CareLink NM services will:

- ⊙ Assist an eligible recipient by engaging him or her in comprehensive needs assessments which are then utilized to develop his or her integrated service plan and individual treatment plans;
- ⊙ Increase his or her access to health education and promotion activities;
- ⊙ Monitor his or her treatment outcomes and utilization of resources;
- ⊙ Coordinate appointments with his or her primary care and specialty practitioners;
- ⊙ Share information among his or her physical and behavioral practitioners to reduce the duplication of services;
- ⊙ Engage him or her to learn how to manage transitions between services; and
- ⊙ Participate, as appropriate, in the development of his or her hospital discharge plan.

Section 10 Eligible Providers and Practitioners:

HSD proposes to allow a provider agency who has been certified to render Comprehensive Community Support Services (CCSS) to apply for a CareLink NM designation. The provider agency must complete a readiness assessment and be approved by the CareLink NM Steering Committee.

Tribal Impact: HSD does not anticipate a service or financial impact to the individuals, tribes or their healthcare providers based on the this new service. Instead, HSD anticipates opportunities for its MAD enrolled IHS and tribal provider agencies to become a CareLink NM provider agency.

HSD proposes to initially limit CareLink NM to provider agencies based in either San Juan or Curry counties which provide CCSS to members of those counties. The rationale to limit provider enrollment at this time is to work through the organizational and implementation challenges of launching a new service. HSD anticipates expansion to other counties and/or tribal communities of CareLink NM services as the program develops.

Tribal Impact: *HSD does not anticipate a negative service or financial impact to the individuals, tribes or their healthcare providers based on the proposed amendments to this rule.*

Section 12 Identified Population:

HSD proposes to provide CareLink NM services to two of the most vulnerable populations: eligible recipients meeting the criteria for serious mental illness (SMI) or severe emotional disturbance (SED). These populations historically utilize hospital emergency departments as well as public institutions to have their physical and behavioral health care needs addressed on a short-term basis.

Tribal Impact: *HSD does not anticipate a negative service or financial impact to the individuals, tribes or their healthcare providers based on the proposed amendments to this rule. Instead, HSD anticipates improved services to eligible recipients.*

Section 13 Covered Services

CareLink NM will cover services in five categories:

- A. Comprehensive care management.
- B. Care coordination and health promotion.
- C. Comprehensive transitional care.
- D. Individual eligible recipient and family support services.
- E. Referrals for the eligible recipient to community and social support services.

Tribal Impact: *HSD does not anticipate a negative service or financial impact to the individuals, tribes or their healthcare providers based on the proposed amendments to this rule. Instead, HSD anticipates improved services to eligible recipients. CareLink NM services provide intensified care coordination to assist the eligible recipient acquire the skills to manage multiple services or to build a network of people who will provide ongoing support to the eligible recipient. A key component of CareLink NM services offers individualized health promotions that provide the eligible recipient with knowledge of his or her long-term physical health needs such as nutrition; and assistance in developing and implementing health promoting lifestyle interventions and healthy social networks. The services provide an eligible recipient moving from a hospital or residential setting back into his or her community with comprehensive transitional care. Family members will receive support services to provide them with the skills and knowledge to effectively advocate on behalf of and with the eligible recipient. CareLink NM staff will assist the eligible recipient in building a network of community and social supports and services to continue his or her health care advances as he or she transitions from CareLink NM services.*

Section 14 Noncovered Services

A. CareLink NM services rendered during an eligible recipient's stay in an acute care or freestanding psychiatric hospital and a residential treatment facility (not to include foster care and treatment foster care placements), except when part of the eligible recipient's transition plan, are not covered services.

B. Services which duplicate other MAD services, including care coordination activities that the Managed Care Organization has not delegated to the provider agency, are not covered services.

Tribal Impact: HSD does not anticipate a negative service or financial impact to the individuals, tribes or their healthcare providers based on the proposed amendments to this rule. Instead, HSD anticipates improved services to eligible recipients. The overall intent of CareLink NM services is to enhance and enrich an eligible recipient's ongoing physical and behavioral health services.

Tribal Consultation Comments -

Tribes and their healthcare providers may view the proposed rule, 8.310.10 NMAC, on the HSD webpage at: <http://www.hsd.state.nm.us/providers/written-tribal-consultations.aspx>, *Letter 15-21*.

Important Dates

- **Written comments must be submitted by 5:00 p.m. Mountain Standard Time (MST) on December 16, 2015.** Please send your comments and questions to the MAD Native American Liaison, Theresa Belanger, at (505) 827-3122 or by email at: Theresa.Belanger@state.nm.us.
- All comments and responses will be compiled and available *after December 30, 2015*.
- **A public hearing on this rule is scheduled be held in the Rio Grande Conference Room, Toney Anaya Building, 2550 Cerrillos Road, Santa Fe, NM on December 16, 2015 from 10 a.m. to 12 p.m. MST.**

Sincerely,



Nancy Smith-Leslie
Director
Medical Assistance Division

cc: Theresa Belanger, Native American Liaison, MAD
HSD/MAD/Quality Bureau
HSD/MAD/PPB-Program Management/Communications Unit