

Introduction

Good afternoon. My name is Kathleen Stedman and I am the Program and Payment Policy Manager at MassHealth in the Executive Office of Health and Human Services (EOHHS). I am here to present testimony on proposed amendments to 101 CMR 362.00: *Rates for Community Support Program Services*. The proposed amendments are anticipated to be effective for dates of services on or after April 1, 2025.

Background

Regulation 101 CMR 362.00 governs payment rates to be used by all governmental units making fee-for-service (FFS) payments to eligible providers of standard and specialized Community Support Program (CSP) services provided to publicly-aided individuals. CSP services are diversionary behavioral health services that help individuals remain in community-based settings, rather than 24-hour level of care, such as inpatient care or other 24-hour diversionary services. CSP services include an array of services delivered by community-based, mobile, paraprofessional staff, supported by a clinical supervisor, to members with mental health or substance use disorder diagnoses, or to members whose psychiatric or substance use disorder diagnoses interfere with their ability to access essential medical services. CSP services do not provide clinical treatment services, but rather provide outreach and support services to enable members to utilize clinical treatment services and other supports. Four models of CSP services are defined in 101 CMR 362.00: 1) CSP; 2) Community Support Program for Homeless Individuals (CSP-HI); 3) Community Support Program for Justice Involved (CSP-JI); and 4) Community Support Program – Tenancy Preservation Program (CSP-TPP).

Proposed Amendments

The proposed amendments align the CSP (code H2015) rate with the Recovery Support Navigator (RSN) proposed rate (code H2015-HF) of \$17.54 per 15 minutes established in 101 CMR 444.00: *Rates for Certain Substance Use Disorder Services*. CSP services are similar to RSN services and therefore alignment of the rates is appropriate. Regulation 101 CMR 444.00 is currently being proposed for an effective date of January 3, 2025. The rate for CSP is proposed to be increased from \$15.88 per 15 minutes to \$17.54 per 15 minutes, effective April 1, 2025.

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Rates for Community Support Program Services
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Additionally, the proposed amendments increase the rates for CSP-HI, CSP-JI, and CSP-TPP by a prospective cost adjustment factor (CAF) of 2.27%. The CAF was calculated using the Spring 2024 optimistic forecast of the Massachusetts Economic Indicators developed by S&P Global Market Intelligence, with a base period of quarter one of calendar year 2025, and a two-year prospective rate period of quarter two of calendar year 2025 through quarter one of calendar year 2027. The proposed per diem rates for these services are as follows: CSP-HI (code H2016-HK) is proposed to be set at \$28.35, CSP-JI (code H2016-HH) is proposed to be set at \$21.93, and CSP-TPP (code H2016-HE) is proposed to be set at \$23.33.

In addition, EOHHS proposes to amend 101 CMR 362.00 to reflect updated terminology and current policy.

The proposed amendments are in accordance with M.G.L. Chapter 118E Section 13C, which requires that rates established by EOHHS for health care services be “adequate to meet the costs incurred by efficiently and economically operated facilities providing care and services in conformity with applicable state and federal laws and regulations and quality and safety standards and which are within the financial capacity of the commonwealth.”

Fiscal Impact

The estimated aggregate fee-for-service annual fiscal impact of the proposed amendments is \$37,000, which is a 5.6% increase over estimated current annual spending of \$668,000.

This concludes my testimony.

Thank you.