

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**Department of Health Care Finance**



Office of the Senior Deputy Director/Medicaid Director

Transmittal # 22-29

**TO:** All Interested Parties

**FROM:** Melisa Byrd  
Senior Deputy Director and Medicaid Director

**DATE:** September 21, 2022

**SUBJECT: Public Notice of Intent to Submit State Plan Amendment and Amendment to the Alternative Benefit Plan – Doula Services, Medicaid Health Homes, Other Licensed Practitioners, Supported Employment Services and Housing Supportive Services**

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The Department of Health Care Finance (DHCF) hereby gives notice of the intent to submit an amendment to the District of Columbia Alternative Benefit Plan (ABP) to the Centers for Medicare & Medicaid Services (CMS) for review and approval. The purpose of this ABP amendment is to align the District’s ABP with the District’s State Plan for Medical Assistance (State Plan) as required under Section 1937 of the Social Security Act. For enrollees under the age of 21, who are still eligible for early and periodic screening, diagnosis, and treatment (EPSDT) services, DHCF assures this SPA complies with 42 CFR 440.385.

This notice informs all interested parties of the District’s intent to add doula services as a new Medicaid benefit under the District’s State Plan through a submitted State Plan Amendment to CMS and to make changes to the ABP to incorporate coverage of doula services. The Fiscal Year 2022 Budget Support Act (BSA) of 2021 requires DHCF to submit a State Plan Amendment (SPA) to CMS that establishes doula services under the District’s State Plan, effective October 1, 2022.<sup>1</sup> On July 22, 2022 DHCF submitted a SPA to CMS for review and approval to authorize Medicaid coverage for doula services.<sup>2</sup> Doula services provide support to the birthing parent throughout the pregnancy and postpartum period to improve maternal health outcomes.

Additionally, DHCF intends to further amend the ABP to assure it is aligned with earlier changes approved under the District’s State Plan. DHCF intends to incorporate changes to cover the following services:

- **Supported Employment Services:** On May 23, 2022, CMS approved a SPA to include supported employment services as a 1915(i) home and community-based services benefit under the District’s State Plan. These services are available to individuals with substance

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<sup>1</sup> D.C. Official Code Section 3-1206.72.

<sup>2</sup> For more information on the doula services benefit, see: <https://dhcf.dc.gov/page/doula-services-benefit-design-and-reimbursement-methodology>.

use disorder or mental illness that meet certain needs-based criteria outlined in the State Plan.

- **Housing Supportive Services:** On March 21, 2022, CMS approved a SPA to include housing supportive services as a 1915(i) home and community-based service State Plan benefit. These services include housing stabilization and housing navigation for individuals who meet the needs-based criteria outlined in the State Plan.
- **Other Licensed Practitioners (OLP):** DHCF has added two additional groups of licensed practitioners, as defined at 42 CFR 440.60, to be covered under the State Plan within their scope of practice under state law:
  - **Pharmacists** are included as eligible Medicaid providers under the OLP benefit. On February 19, 2020, CMS approved a SPA to allow the district to include licensed pharmacists as Medicaid-eligible providers.
  - **Independently licensed behavioral health workers** are included as eligible Medicaid providers under the OLP benefit. On September 24, 2021, CMS approved a SPA to allow the District to enroll this group of independently licensed behavioral health providers to service the District's behavioral health population.
- **Medicaid Health Homes:** Medicaid Health Homes integrate physical and behavioral health care for individuals with multiple chronic conditions and/or serious mental illness (SMI) in the District of Columbia. The authority for health homes was first established by Section 2703 of the Patient Protection and Affordable Care Act of 2010 (P.L.111-148). Health Homes were approved under the State Plan by CMS on September 2, 2015 for individuals with SMI, and on February 6, 2017 for individuals with multiple chronic conditions.

This notice informs all interested parties of DHCF's intent to submit these amendments to the District's ABP to CMS on or about October 1, 2022. The effective dates and expected costs associated with the ABP coverage changes are as follows:

- Doula Services will have an effective date of October 1, 2022, and a federal budget impact of \$578,585.63 for federal fiscal year (FFY) 2023, and \$548,918.38 for FFY 2024.
- Supported Employment Services for beneficiaries with substance use disorder or severe mental illness will have an effective date of July 1, 2022 and a federal budget impact of \$310,219.77 for FFY 2022, and \$431,412.29 for FFY 2023.
- Housing Supportive Services will have an effective date of May 1, 2022, and a federal budget impact of \$17,585,367 for FFY 2022, and \$35,170,734 for FFY 2023.
- Services that are provided within the scope of practice and in accordance with District law by Independently Licensed Behavioral Health Practitioners has an effective date of January 1, 2022 and a federal budget impact of \$1,669,313.07 for FFY 2022 and \$2,321,458.04 for FFY 2023.
- Services that are provided within the scope of practice and in accordance with District law by licensed pharmacists has an effective date of February 15, 2020. The District does not expect any additional financial increase from continuing to provide these services.
- Medicaid Health Homes for beneficiaries with multiple chronic conditions will have an effective date of July 1, 2017, and the District expects no financial increase from continuing to provide these services.

- Medicaid Health Homes for beneficiaries with severe mental illness will have an effective date of January 1, 2016, and the district expects no financial increase from continuing to provide these services.

If you have any questions or comments on the proposed SPAs, contact Mario Ramsey, Associate Director, Health Care Research and Policy Administration, Department of Health Care Finance at [mario.ramsey@dc.gov](mailto:mario.ramsey@dc.gov). Comments will be accepted until October 7, 2022.

**Cc:** DC Medical Care Advisory Committee Stakeholders  
DC Hospital Association  
DC Primary Care Association  
DC Health Care Association  
DC Behavioral Health Association  
DC Coalition of Disability Service Providers  
Medical Society of DC