

Public Comment on Medicaid Redesign Team (MRT) II

March 2, 2020

The Urban Justice Center Mental Health Project (MHP) recommends MRT II develop a path for Medicaid Health and Recovery Plan (HARP) beneficiaries to directly assist the State with improving access to Behavioral Health Home and Community Based Services benefits (BH HCBS).

Medicaid HARP formed out of MRT I and is a crucial program for people with serious mental health concerns (including substance use disorders). It is intended to give beneficiaries the recovery supports needed to stay in community and out of institutions like hospitals and jails. Unnecessary institutionalizations are often severely disruptive for the individual's life, and are also very costly to the State. MRT II must ensure that Medicaid HARP is well-funded and structured in a way that promotes the person-centered wellness and recovery principles upon which it was founded.

Our organization has been providing direct legal and social work assistance to Medicaid HARP beneficiaries since 2016. We interact with MCOs, agencies and providers at all levels of the Medicaid HARP workflow to assist our clients accessing the BH HCBS benefits they seek.

Since HARP's inception, the number of HARP eligible persons actually receiving BH HCBS benefits has stagnated at less than 5%. This is an abysmal number. HARP beneficiaries consistently express significant interest in receiving BH HCBS benefits, but even with legal assistance, they face a multitude of systemic barriers to accessing those benefits. In short, the workflow doesn't flow.

MHP has learned a great deal from listening to our clients, who are also uniquely positioned to assist the State in understanding the minutia of how HARP is actually functioning on the ground level. HARP beneficiaries possess a deep level of experience with the intersection of the multitude of agencies and systems involved in progressing from eligibility to receiving BH HCBS. They are particularly well placed to give specific, person-centered insight and policy recommendations, including identifying systemic inefficiencies and areas for quality improvement. MHP looks forward to MRT II including a system for the State to truly utilize the input of beneficiaries on a systemic level.