

From:
To:
Subject: [External] FW: EPSDT Considerations for the 2022-2027 1115 Medicaid Waiver
Date: Thursday, February 10, 2022 5:03:38 PM
Importance: High

The Oregon Health Authority (OHA) appreciates the clear feedback from the community, including advocates, children's service organizations and other interested parties, regarding Early and Periodic Screening, Diagnostic, and Treatment (EPSDT) services provided to children and adolescents enrolled in the Oregon Health Plan (OHP). OHA has taken this feedback seriously.

After careful consideration of community input and a comprehensive internal review, OHA has decided to not seek a renewal of its long-standing waiver regarding the EPSDT benefit for children and adolescents in its [upcoming 1115\(a\) Medicaid waiver renewal application](#) in its current structure.

In its [waiver](#) application, OHA will propose to the Centers for Medicare & Medicaid Services (CMS) to cover all treatments and services determined as medically necessary in accordance with the EPSDT benefit, after a phase out period, as described below.

The public and transparent process of Oregon's Health Evidence Review Commission (HERC) and the Prioritized List of Health Services will retain important roles in determining OHP benefits for children, adolescents and adults. Oregon will specifically meet the EPSDT benefit requirements for children and adolescents in the following ways:

- Any treatment covered according to the Prioritized List of Health Services will, by default, be considered medically necessary for all people covered by OHP.
- For services not covered according to the Prioritized List, the medical necessity of services for individual children and adolescents will be considered on a case-by-case basis as required by EPSDT.

In preparation for this transition, OHA will take several steps to ensure

that Medicaid-eligible children, adolescents and their families are aware of EPSDT and have access to required screenings and medically necessary treatments. These steps include but are not limited to:

- The HERC will complete a comprehensive review of services not currently covered according to the Prioritized List of Health Services with attention to the unique needs of children and adolescents.
- The HERC will adjust the Prioritized List to ensure that all medically necessary EPSDT services for the population of children and adolescents are covered.
- For services not covered according to the Prioritized List, OHA will ensure there are accessible and effective pathways for individual case-by-case review of medical necessity as required by EPSDT. OHA is aware that these processes can be lengthy and burdensome to providers and families and aims to improve that experience. OHA understands that children, adolescents and families managing complex medical needs require processes that are accessible and responsive to their needs.
- OHA will develop clear guidance and communications for providers and families to ensure they are aware of the change in benefits, including the right to an individual determination of medical necessity.

In order to achieve OHA's goal of ending health inequities by 2030, barriers to medically necessary care must be removed for children and adolescents in accordance with EPSDT.

OHA appreciates the feedback from all interested parties regarding this important topic and looks forward to ongoing collaboration to optimize child and adolescent health as part of the state's next Medicaid waiver renewal. If you have questions or feedback, please email 1115Waiver.Renewal@dhsosha.state.or.us.

Sincerely,

Jeremy Vandehey, Director, Health Policy and Analytics Division

Dana Hittle, State Medicaid Director (Interim), Health Systems Division