



STATE OF CONNECTICUT

DEPARTMENT OF SOCIAL SERVICES
OFFICE OF THE COMMISSIONER

Deidre S. Gifford, MD, MPH
Commissioner

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Submitted Via Email to: 1115DemoRequests@cms.hhs.gov

August 9, 2021

Teresa DeCaro, Acting Director
State Demonstrations Group
Centers for Medicare & Medicaid Services
Center for Medicaid & CHIP Services
Mail Stop: S2-26-12
7500 Security Boulevard
Baltimore, MD 21244-1850

Re: Connecticut's Submission of Substance Use Disorder (SUD) Demonstration Waiver Pursuant to Section 1115 of the Social Security Act

Dear Ms. DeCaro,

The State of Connecticut Department of Social Services (DSS), Connecticut's single State Medicaid and Children's Health Insurance Program (CHIP) agency, submits the enclosed application for a substance use disorder (SUD) demonstration waiver pursuant to section 1115 of the Social Security Act (Demonstration).

This Demonstration will ensure a complete American Society of Addiction Medicine (ASAM) levels of care service array is available as part of an essential continuum of care for beneficiaries with opioid addiction or other SUDs. Connecticut requests that the Demonstration be effective immediately upon CMS approval to use Institutions for Mental Disease (IMDs) as a Medicaid-covered setting by waiving the federal IMD coverage exclusion for applicable SUD services. Separately, Connecticut will submit a Medicaid State Plan Amendment (SPA) in conjunction with this Demonstration to cover residential and inpatient treatment, as well as all levels of withdrawal management (ASAM levels 1-WM, 2-WM, 3.1, 3.2-WM, 3.3, 3.5, 3.7, 3.7-WM, 4).

This Demonstration is the result of a collaborative effort among various state agencies and other partners, including the three partner state agencies of the Connecticut Behavioral Health Partnership (CTBHP): DSS; the Department of Children and Families (DCF), the lead state agency for children's behavioral health; and the Department of Mental Health and Addiction Services (DMHAS), the lead state agency for adult behavioral health. DSS, DMHAS, and DCF

have been engaging extensively with SUD providers and other stakeholders to develop and refine the Demonstration.

In accordance with CMS State Medicaid Director Letter # 17-003, the attached Demonstration and Implementation Plan collectively outline the state's comprehensive strategy to comply with all applicable federal requirements for SUD demonstrations, including: achieving the goals and milestones for SUD demonstrations; evidence-based programs; data collection and reporting; performance measurement; monitoring and evaluation; and strategy to improve access to and quality of SUD services.

Pursuant to 42 C.F.R. § 431.408, the state completed the required public process for the Demonstration, as described and documented in the appendix to the Demonstration. The state published public notice in the Connecticut Law Journal, which is the state's register, on February 2, 2021 and posted public notice on the DSS website for a 30-day public comment period that ran from February 2, 2021 through March 4, 2021. DSS held two electronic public hearings, one hosted by the state's legislatively established Behavioral Health Partnership Oversight Council on February 10, 2021 and another hosted by DSS on February 18, 2021. DSS received several written comments and also received verbal comments during the public hearings, which are summarized in the responses to comments included in the appendix to the Demonstration. In accordance with the process set forth in the state's approved tribal consultation SPA, the state sent notice of this Demonstration to Connecticut's two federally recognized Indian tribes on February 2, 2021. The tribal representatives did not send any comments on this SPA. This Demonstration does not have a unique or particular impact on tribal members.

If you have any questions about this Demonstration, please contact William Halsey, Director of Integrated Care, Division of Health Services at William.Halsey@ct.gov. Thank you for your consideration.

Respectfully submitted,

Deidre S. Gifford, MD, MPH
Commissioner

Cc: Lorraine Nawara, CMS
Andrea Casart, CMS
Deborah Steinbach, CMS
Michael Tankersley, CMS
Marie DiMartino, CMS
Kathryn Holt, CMS

*Connecticut's Submission of Substance Use Disorder (SUD) Demonstration Waiver Application
Pursuant to Section 1115 of the Social Security Act
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Melissa McCaw, Secretary, OPM
Claudio Gualtieri, Under Secretary, Office of Policy and Management
Judith Dowd, Office of Policy and Management
Susan Eccleston, Office of Policy and Management
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Nancy Navarretta, Acting Commissioner, DMHAS
Vanessa Dorantes, Commissioner, DCF
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Michael Gilbert, Deputy Commissioner, DSS
Kate McEvoy, Director, Division of Health Services, DSS
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