PUBLIC SUBMISSION

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Comment On: CMS-2024-0001-0001 Agency Information Collection Activities; Proposals, Submissions, and Approvals: Medicaid and Children's Health Insurance Program

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Submitter Information

Name: Anonymous Anonymous Email: kathleen.e.duemling@affiliate.dhhs.nh.gov

General Comment

Regarding CMS–10398 form #45 with the OMB control number: 0938–1148:

In the "Guidance to Planning Grant States to Apply to Participate in the Section 223 CCBHC Demonstration Program", on page 9, which describes requirements of the program narrative, several clarifications would be beneficial. Part D includes "A summary of discussions with the federal evaluation planning team regarding the selection of an appropriate comparison group for an assessment of access, quality, and scope of services available to Medicaid enrollees served by CCBHCs." Is this comparison group to be used as the comparator for part E? Or if not, how will this be used? In part E (again on page 9) it reads, "Goal 2. Improve availability of, access to, and participation in, services described in subsection (a)(2)(D) to individuals eligible for medical assistance under the State Medicaid program." What is (a)(2)(D) referring to? Additionally, it reads, "Goal 3. Improve availability of, access to, and participation in assisted outpatient mental health treatment in the state." What is meant by "assisted outpatient mental health treatment"? Is this referring to court-ordered mental health treatment for people who refuse or are unable to comply with voluntary treatment? If not, what is the difference between goal 2 and 3 (access for Medicaid beneficiaries vs. all citizens?).