



## Re-Entry Service

### What are Re-Entry Services?

Recently approved by the Centers for Medicare and Medicaid Services (CMS), Re-Entry Services are a bundle of services provided up to 90 days pre-release to individuals who are incarcerated. Pursuant to the Federal Medicaid Inmate Exclusion Policy, states are prohibited from using Medicaid dollars to provide health care services to individuals who are incarcerated, even if they would otherwise meet Medicaid eligibility requirements. In practice, states enforce this rule by terminating or suspending Medicaid coverage while individuals are incarcerated and until they reenter their communities.

In recent years, an increasing number of states have sought workarounds to the inmate exclusion in order to begin providing Medicaid reimbursable services to individuals pre-release and better coordinate care and services upon release. Justice-involved populations are disproportionately affected by mental health, substance use disorder (SUD), and other chronic conditions, including HIV/AIDS and hepatitis c. Suspension or termination of Medicaid coverage makes it challenging for individuals to re-engage in needed care upon release. Re-Entry Services provide states with the opportunity to provide Medicaid-reimbursable services to individuals who are preparing to return to their communities, including care coordination and planning pre- and post-release and Medicaid re-enrollment assistance.

CMS approved California's and Washington's 1115 Re-Entry Demonstration Waivers in 2023 and Massachusetts's and Montana's 1115 Re-Entry Demonstration Waivers in early 2024. Under these Waivers, all four states will provide case management, clinically appropriate Medication Assisted Treatment (MAT) services, and a 30-day supply of all prescribed medications. In addition to these minimum services required by CMS, California and Washington are providing physical and behavioral health clinical consultation services, laboratory and radiology services, and services provided by community health workers with lived experience. Montana will also provide limited clinical consultation, and Massachusetts will phase-in physical and behavioral health clinical consultation, medications and medication administration, and laboratory and radiology services over time.

### CMS Guidance: State Medicaid Director Letter

CMS published a State Medicaid Director Letter (SMDL) in the spring of 2023, and all four approved 1115 Re-Entry Demonstration Waivers are consistent with this guidance. Broadly, the SMDL provides states with high-level expectations and required components for Re-Entry Demonstration Waiver applications. Specifically, the SMDL offers guidance to states with respect to:

- ✔ Defining eligible populations and determining facility types.
- ✔ Service provision timeframe, ranging from 30 to 90 days pre-release.
- ✔ Covered services, including those which CMS requires and those which CMS highly encourages states to cover.
- ✔ Leveraging CMS' enumerated goals to guide the development of programmatic objectives.
- ✔ Engaging individuals with lived experience and incorporating their perspectives and insight into the waiver design, implementation, and evaluation phases.
- ✔ Seeking opportunities for enhanced matching dollars to support development or improvement of Medicaid systems and data sharing capacity.
- ✔ Facilitating the interphase between correctional facilities and community providers and ensuring secure data sharing.

## How PCG Can Help

For over 35 years, Public Consulting Group (PCG) has been collaborating with public providers and state agencies to identify and implement practical, cost-effective solutions and achievable recommendations. Throughout our firm's history, PCG has worked with Medicaid and health and human service agencies nationwide to conceptualize and implement key program enhancements. Our team brings unparalleled Medicaid program experience in benefit design planning, service delivery requirements, financing, reimbursement, performance monitoring, and implementation.

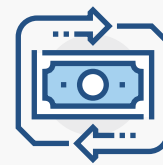
PCG has conducted a thorough analysis of CMS's SMDL, California's, Massachusetts's, Montana's, and Washington's approved Waivers, as well as the pending waiver applications from the nineteen states that continue to wait for approval from CMS. Several states have received partial approval of their Demonstration Waivers from CMS, but the Re-Entry Service bundle within those waivers has not been approved for implementation. A few states have also submitted amendments to their initial applications, acknowledging CMS's SMDL and bringing their proposed services into better alignment with this guidance.

### Project Highlight

PCG serves as Third-Party Administrator (TPA) for an innovative 1115 waiver, supporting the Re-Entry Demonstration funding collaboration, infrastructure, and IT investments that support implementation of pre-release and reentry planning services 90 days pre-release. PCG has supported the client with:



The planning grant funding opportunity, which provided funding to support collaboration and implementation planning and brainstorming among correctional agencies, county social services department, and other partners for purposes of preparing for pre-release Medicaid enrollment and suspension processes; and



The implementation grant funding opportunity, which provided more substantial funding to successful applicant entities to begin implementing the processes and modifications identified in phase one to support pre-release Medicaid enrollment and suspension.

**PCG can assess your state's capacity to provide Re-Entry Services, assist your state in drafting or amending an 1115 Re-Entry Demonstration Waiver, and support implementation of your state's waiver once it is approved.**

**To learn more about how PCG can help your state, contact us today!**

 (800) 210-6113  [healthpolicynews@pcgus.com](mailto:healthpolicynews@pcgus.com)

 [www.publicconsultinggroup.com](http://www.publicconsultinggroup.com)