

June 14, 2016

Administrative Rules Committee

Chairman Devlin and Members of the Committee

My name is Kurt Snyder and I am the Executive Director of the Heartview Foundation. In 2006, Heartview employed less than 10 staff. Over the past 10 years, we have grown to employ over 70 employees. On August 3rd, 2015 we opened a second site which is a 16 bed residential center in Cando, ND. We employ a very diverse staff including a psychiatrist, psychologists, nurses, addiction counselors, social workers, and mental health counselors.

I am here today to provide input into the creation and passing of North Dakota Administrative Code Chapter 75-09.1-11, Substance Abuse Disorder Treatment Voucher System. Heartview Foundation is very interested in participating in the Voucher Program. We support the work that has been done to develop Administrative Code and the intent of the program. We believe the program will indeed provide choice of providers and access to services for individuals with substance abuse disorders.

We do however have the following concerns:

- In regards to the administration of the program, a concern arises as to the requirement that providers develop policy and procedure in accordance with the ND Administrative Code when the vast majority of the requirements are included in the MOU that the provider and the ND Department of Human Services will sign. We would recommend that this requirement be eliminated and that everything be detailed in the MOU.
- In regards to the requirement that providers inform potential patients of program and service information to allow for choice, will there be any information disseminated by the Department prior to the start date of the program so the citizens of ND are informed of the program?
- The draft of the Administrative Code 75-09.1-11-02, states that the department shall approve or deny a program's application within twenty working days of receipt of a complete application. This timeframe seems to be too long. We would recommend five or ten working days. Providers are already licensed by and well-known to the Department.

- In regards to the participants' application, the income verification of obtaining tax returns seems onerous. We recommend that this process be simplified. Another issue related to the participant application is the timeframe for the department to approve or deny the application which is five working days. We believe that these factors will impede the ability to get participants into services in a timely manner.
- In regards to the reimbursement rates for services, it appears that rates are being established based on current Medicaid rates. Residential SUD services are not currently covered within the Medicaid fee structure. We would suggest that residential rates be set at the Medicaid Expansion which already excludes room and board and pays only for the treatment aspects of care.
- The income guideline of no greater than 200% of the poverty guideline will restrict those participants who are uninsured or have high deductible insurance plans and out of pocket expenses related to insurance. The gap between Medicaid Expansion income limits and 200% of poverty level is \$15,000 annual income for a family of four. We suggest considering moving the rate to 250% of the poverty guideline. This would allow for a family of four with an annual income of less than \$60,000 to receive services without high out of pocket costs.
- In regards to access for those participants who live in underserved and or rural and frontier counties, oftentimes these individuals cannot obtain insurance coverage for residential treatment services if they need it. For example, if the individual needs day treatment or primary outpatient services, it is not realistic to expect that they can drive long distances for this level of care.
- In regards to the collecting and reporting of outcome measures, providers will need clarification of what the expectations are of process data and definition of outcome data. We have a question as to whether the providers will be able to report these data at the time that invoices are submitted.

That concludes my testimony. I would be happy to answer any questions you might have. Thank you.

Kurt Snyder, Executive Director

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