

Montana Waiver for Additional Services and Populations (WASP) Demonstration Program

1115 Waiver Extension Public Hearing

October 7, 2026



DEPARTMENT OF
**PUBLIC HEALTH &
HUMAN SERVICES**

Welcome & Zoom

Zoom Overview

- Participants are joining by computer and phone
- Everyone will be automatically muted upon entry

Closed Captioning

- Live closed captioning is available. You can click the “CC” box at the bottom of the Zoom box

Submitting Public Comments

- **Q&A Box.** All information and questions received through the Q&A box will be recorded as public comments.
- **Spoken.** Participants will have the opportunity to submit live public comments in the last half of the webinar (*more details will be shared about how to “raise your hand” & “unmute” yourself at that time*)



Agenda

1. WASP Waiver Background
2. Proposed Waiver Extension and Amendment Request
3. Waiver Evaluation and Monitoring
4. Timeline and Submission of Public Comment



Presentation Objectives

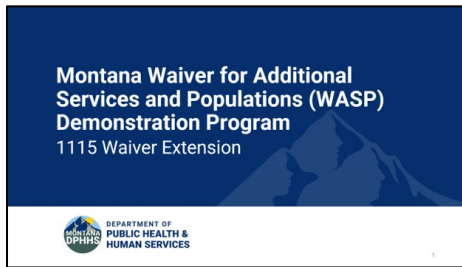
- Review the WASP Section 1115 Waiver Extension and Amendment Application; and
- Provide an opportunity to submit public comments.



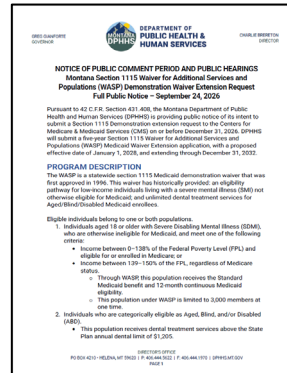
Accessing Montana WASP Materials

Information on the Montana WASP Demonstration extension can be found on the DPHHS WASP webpage.

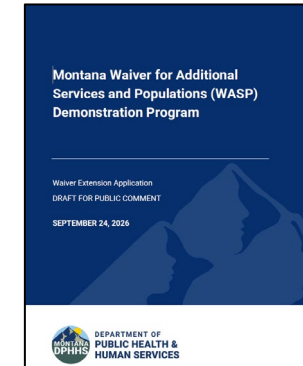
<https://dphhs.mt.gov/MontanaHealthcarePrograms/medicaid/Medicaid1115Waiver/>



This Presentation



The Public Notice



**The Montana WASP
Waiver Extension
Application**



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Submitting Public Comments

The state public comment period for the WASP Demonstration renewal is currently ongoing. To be considered prior to CMS submission, comments must be received by 11:59 PM MT on November 23, 2026.

Mail

Department of Public Health and Human Services
Medicaid WASP Waiver
Director's Office
Room 301
PO Box 4210
Helena, MT 59604-4210

Email

dphhscomments@mt.gov

Indicate "Medicaid WASP Waiver" in the email's subject line

Today's Public Hearing

Q&A and Spoken Comments. All information and questions received through the chat function and spoken comments will be recorded as public comments.



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Background of the Current WASP 1115 Demonstration



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Summary of Section 1115 Waiver Authority

Under Section 1115 of the federal Social Security Act, the Secretary of Health and Human Services has the authority to approve a state's request to waive compliance with provisions of federal Medicaid law.

An 1115 Waiver must be:

- An experimental, pilot, or demonstration project;
- Likely to assist in promoting the objectives of the Medicaid program;
- Budget neutral to the federal government; and
- Limited in duration to the extent and period necessary to carry out the demonstration.
- States must provide a public process for notice and comment on proposed demonstration applications and extensions.

In 2022, DPHHS received approval under this federal authority; it is set to expire in 2027.

DPHHS is now seeking authority to amend and extend the WASP Demonstration for another five years.



Current WASP Demonstration Overview

The WASP is a statewide section 1115 Medicaid demonstration waiver that was first approved in 1996. This waiver has historically provided: an eligibility pathway for low-income individuals living with a severe disabling mental illness (SDMI) not otherwise eligible for Medicaid; and unlimited dental treatment services for Aged/Blind/Disabled Medicaid enrollees.

Eligible individuals belong to either Population 1 (SDMI) or Population 2 (ABD).

Population 1 (SDMI)

Adults aged 18 or older with SDMI who are otherwise ineligible for Medicaid and have income between 0 and 138 percent of the federal poverty level (FPL) and are eligible for or enrolled in Medicare, or adults aged 18 or older with SDMI who are not otherwise eligible for Medicaid and have income between 139 and 150 percent of the FPL, regardless of Medicare status.

- This population receives standard Medicaid benefits and 12-month expanded continuous Medicaid eligibility.
- This population served through this portion of WASP will now be referred to as the SDMI population.
- This population is limited to 3,000 members at one time.



Current WASP Demonstration Overview

Population 1 (SDMI) Goals

The broad goal of the WASP aligns with Montana's Medicaid program: to ensure that medically necessary care is available to all eligible Montanans within available funding.

The goal of WASP, specific to the SDMI population, is threefold:

- Improving access to mental health care;
- Improving utilization of mental health care; and
- Improving mental health outcomes for adults age 18 or older with Severe Disabling Mental Illness (SDMI) who qualify for, or are enrolled in, WASP.



Current Demonstration Summary

Population 2 (ABD)

Individuals who are categorically eligible for Medicaid under the Aged, Blind, or Disabled (ABD) category, who receive enhanced dental benefits beyond the State Plan's \$1,205 dental treatment cap. The current Special Terms and Conditions of the waiver indicate that the State Plan annual dental limit is \$1,125. As of July 1, 2025, the State Plan annual dental limit is \$1,205.

- There is no enrollment limit for this population.

Population 2 (ABD) Goal

The goal of the WASP for the ABD population is to provide individuals determined categorically eligible for ABD with dental treatment services above the \$1,205 State Plan limit.



Overview Proposed Demonstration Extension and Amendment Request



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Proposed WASP Waiver Extension

DPHHS is requesting renewal of the WASP Demonstration for an additional five-year period, from January 1, 2028, through December 31, 2032.

The extension request includes only one amended component.

- Per guidance received from CMS, the extension request is seeking to remove § 1115(a)(2) expenditure authority for 12-month continuous enrollment for the SDMI population. The SDMI population will no longer receive 12-month expanded continuous Medicaid eligibility. Instead, they will receive the standard 6-month continuous eligibility period.
- All other components of WASP will remain unchanged.
- See current Special Terms and Conditions.
 - <https://www.medicaid.gov/medicaid/section-1115-demo/demonstration-and-waiver-list/82366>



Proposed WASP Waiver Extension

Delivery System, Benefits, and Cost-Sharing

Montana does not propose any changes to the Medicaid health care delivery systems.

- Demonstration enrollees will continue to receive services through the State's fee-for-service delivery system.

Montana does not propose any changes to benefits for Demonstration enrollees.

- Demonstration enrollees will continue to receive the same benefits as they currently receive through the standard Medicaid benefit.

No cost-sharing will be included in this 1115 extension request.



Proposed WASP Waiver Extension

Annual Expenditures

Montana anticipates the WASP Demonstration renewal to remain budget neutral, consistent with Section 1115 requirements and CMS budget neutrality policies.

EXPENDITURE PROJECTIONS TABLE

Waiver Population	DY 25 - CY 2028	DY 26 - CY 2029	DY 27 - CY 2030	DY 28 - CY 2031	DY 29 - CY 2032
WASP ABD	\$1,400,097	\$1,456,101	\$1,514,345	\$1,574,919	\$1,637,915
WASP SDMI	\$5,975,351	\$6,214,365	\$6,462,940	\$6,721,457	\$6,990,316
TOTAL	\$7,375,448	\$7,670,466	\$7,977,285	\$8,296,376	\$8,628,231



Proposed WASP Waiver Extension

Enrollment

Montana is not proposing any changes to Medicaid eligibility requirements in this Section 1115 Demonstration renewal request. As such, the Demonstration is not expected to affect enrollment trends.

ENROLLMENT PROJECTIONS TABLE

Waiver Population	DY 25 - CY 2028	DY 26 - CY 2029	DY 27 - CY 2030	DY 28 - CY 2031	DY 29 - CY 2032
WASP ABD	23,040	23,501	24,206	24,932	25,680
WASP SDMI	582	594	612	630	649
TOTAL	23,622	24,095	24,818	25,562	26,329



Waiver Evaluation and Monitoring



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WASP Evaluation

Goals and Objectives

- This extension request is seeking to extend the § 1115(a)(2) expenditure authority and does not propose any future additional goals of the WASP Demonstration Program.

Legal Authorities

- This extension request is seeking to extend § 1115(a)(2) expenditure authority for an additional 5 years and does not propose any additional waiver and expenditure authority changes to the WASP Demonstration Program.

Evaluation and Monitoring

- This extension request is seeking to extend § 1115(a)(2) expenditure authority for an additional 5 years and does not propose any additional hypotheses to the WASP Demonstration Program.
 - Montana is required to contract with an independent third party to conduct evaluations and develop evaluation design plans.
 - The Interim Evaluation Report will be submitted to CMS along with the extension application.



WASP Evaluation

Hypothesis Questions-SDMI

1. Does the provision of Standard Medicaid benefits coverage for SDMI enrollees impact their access to covered services?
2. Does the provision of Standard Medicaid benefits coverage for WASP enrollees impact utilization of community-based mental health covered services and psychotropic prescription drug services?
3. Does the provision of Standard Medicaid benefits coverage impact health care outcomes in the WASP population?
4. Does the addition of telehealth services to the provision of Standard Medicaid benefits coverage impact health care outcomes in the WASP population?

Hypothesis Question-ABD

1. Do beneficiaries utilize covered dental health services?

Montana uses survey responses and/or claims data to answer the hypothesis questions to evaluate the WASP.



Submitting Public Comment

Timelines and Next Steps

Milestones	Proposed Timeline
<i>Conduct 60-day State public comment</i>	September 24, 2026 - November 23, 2026
Mail Tribal Consultation Letter	September 24, 2026
Public Hearing (1 of 2) In-Person/Zoom	October 2, 2026, 10:00 am to 12:00 pm MT
Public Hearing (2 of 2) Zoom Only	October 7, 2026, 3:00 to 4:30 pm MT
Review public comments and finalize documents for CMS submission	October-November 2026
<i>Submit WASP Waiver Extension</i>	<i>By December 31, 2026</i>
CMS federal 30-day public comment period	
Negotiations with CMS	January 2027-December 2027
<i>Effective date of WASP Waiver Extension</i>	January 1, 2028



Submitting Public Comment

All comments will be reviewed and considered equally, whether received in writing or verbally.

Written Comment

Use the Zoom chat to submit information, questions, or comments. Chat submissions will be included in the public comment record.

Spoken Comment

Use “Raise Hand” and wait for the moderator to call on you. The moderator will then provide instructions to unmute.

Follow the instructions for your device

Joining by Phone

1. Press *9 to raise your hand.
2. Listen for the moderator to call your phone number.
3. Press *6 to unmute when selected.

Joining through Zoom

1. Select Raise Hand at the bottom of the Zoom window.
2. Wait for the moderator to call on you.
3. Confirm that your microphone is unmuted.



Public Comment

After reviewing comments submitted during the state public comment period, Montana will submit a revised application to CMS.

Interested parties will also have an opportunity to comment during the federal public comment period. The submitted application will be available for comment on the CMS website at: <https://www.medicaid.gov/medicaid/section-1115-demo/demonstration-and-waiver-list>.



Conclusion



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