



"People  
helping people  
help  
themselves"

Michael R. Pence, Governor  
State of Indiana

*Indiana Family and Social Services Administration*  
402 W. WASHINGTON STREET, P.O. BOX 7083  
INDIANAPOLIS, IN 46207-7083

*Confidential and Privileged – Governmental Deliberative Process Privilege*

TO: Christopher D. Atkins, Director  
Office of Management and Budget

FROM: Debra F. Minott, Secretary, Indiana Family and Social Services Administration

RE: Family impact certification - integrated health care coordination services

DATE: October 22, 2013

CC: Angela Amos, Matthew Cesnik, Carol Farzetta, Debra Herrmann and Gary Parker

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This certification, submitted in accordance with Executive Order #13-05, formalizes the Family and Social Services Administration's ("FSSA") assessment of the impact on Indiana families of a proposed rule implementing a new program to provide community-based services to Medicaid applicants requiring intensive care for mental health conditions.

**Executive Order 13-05 Certification of rules affecting families**

Executive Order 13-05 ("Executive Order") requires the FSSA, prior to adopting any policy or rule, to certify that it has assessed its "real or potential impact on family well-being or family formation" in light of considerations set out in Section 2.a. -f. of the Executive Order. In addition, FSSA must justify any rule that is expected to have a negative impact on family well-being or formation. The Office of Management and Budget ("OMB") must respond to FSSA's statement no later than seven (7) days before the public hearing.



### Summary of the proposed rule

The proposed rule implements a new program to provide community-based services to Medicaid applicants requiring intensive care for mental health conditions. This new program, commonly known as a "1915i program," will provide continued access to services for approximately 2,400 high needs individuals who will lose access to such services when Indiana converts to a 1634 state in April 2014.<sup>1</sup> OMPP must promulgate administrative rules to implement this program to ensure this at risk population does not have a gap in access to care. The proposed rule will be effective 30 days after filing with the Publisher.

### Impact of the proposed rule on family well-being or family formation

The proposed rule should have **no impact** on family well-being or family formation. Indeed, the proposed rule simply provides medical coordination services for adults with mental impairments and concurrent medical needs. It also provides continued Medicaid eligibility for and access to Medicaid Rehabilitation Option (MRO) services for approximately 2,400 current spend-down enrollees who will otherwise lose access to these critical intensive mental health services with elimination of the Medicaid spend-down program under the State's transition to 1634 status. The program is designed to improve the coordination of physical and behavioral health services rendered to individuals with significant mental health needs. Accordingly, it is expected that it will have a **neutral** impact on family well-being. FSSA is submitting this certification to OMB that it has considered the requisite criteria in Executive Order 13-05 in developing the proposed rule.

Office of the Secretary of Family and Social  
Services



Debra F. Minott  
Secretary

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<sup>1</sup> Indiana is currently a "209(b) state," meaning Indiana's Medicaid eligibility criteria are more restrictive than the federal standards for supplemental security income. As a 1634 state, the federal Social Security Administration will make eligibility determinations for aged, blind and disabled individuals seeking medical coverage and OMPP will defer to that determination.