

Janet T. Mills
Governor

Sara Gagné-Holmes
Commissioner



Maine Department of Health and Human Services
Office of MaineCare Services
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June 17, 2025

Senator Ingwersen, Chair
Representative Meyer, Chair
Members, Joint Standing Committee on Health and Human Services
100 State House Station
Augusta, ME 04333-0100

Senator Ingwersen, Representative Meyer and members of the Joint Standing Committee on Health and Human Services:

This is in response to your May 8, 2025, letter to the Department requesting additional information regarding MaineCare's Rate Reform Schedule for Calendar Year 2025. Enclosed, please find the final Calendar Year 2025 Rate Determination Schedule along with a letter that provides a summary of public comments received and any Department response or action to these comments. These materials will be posted to the Office of MaineCare Service's Rate Reform website: <https://www.maine.gov/dhhs/oms/providers/mainecare-rate-system-reform>.

Thank you for your continued support of MaineCare's Rate Reform efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Michelle Probert", is written over a horizontal line.

Michelle Probert
Director
Office of MaineCare Services
Maine Department of Health and Human Services

Enclosure:

Calendar Year 2025 Rate Determination Schedule

Letter from Office of MaineCare Services Director Michelle Probert – Rate Determination Schedule

Janet T. Mills
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June 17, 2025

Re: MaineCare Final Rate Determination Schedule

Dear MaineCare Interested Parties,

Today, the Office of MaineCare Services (OMS) released the final MaineCare Rate Determination Schedule for Calendar Year 2025 (CY25) which lists the rate determinations that will continue or be initiated during CY25. The schedule was developed in alignment with Rate Reform law (MRS Title 22, §3173-J) and in collaboration with the Rate Setting Technical Advisory Panel and other interested parties. The Department offered the opportunity for public comment on the draft schedule prior to the Department releasing this final version. This letter provides MaineCare's rationale for certain decisions around the final version of the schedule.

The Department considers many competing priorities when developing its annual schedule, including prioritizing services that have not yet had a redetermination, federal and state directives, access issues, and potential for cost savings. While the Department is not making changes to the CY25 schedule in response to public comments, we are providing a summary of the comments and any resulting actions or additional information below:

- One comment from several providers of Private Non-Medical Institutions (PNMI) B, substance use disorder treatment facilities requested that the Department add Medically Managed Withdrawal (MMW) services to the CY25 schedule. These services had a rate determination in 2020 (implemented in November 2021), resulting in an average rate increase of 37.5%, with non-hospital-based MMW services specifically receiving the largest increase of 77.3%. Additionally, since these rates were implemented, all PNMI B services have received annual cost-of-living increases. The Department recognizes that the treatment landscape for PNMI B providers is changing and appreciates detailed comments on the matter. Rate Reform law mandates that the Department conduct a review for each section or service at least once every five years in anticipation of changes such as those described by commentators, which affect the cost of providing services. The Department appreciates the concerns shared by these providers but cannot at this time prioritize this work ahead of schedule given limited capacity and competing priorities. We will consider these comments when drafting our CY 2026 schedule and will continue to seek ways to support these providers in the meantime.
- One commenter requested that the Department add dental services to the schedule due to continued access issues and specifically called out the high need for specialty services such as those for people with special needs or intellectual disabilities. Despite significant rate increases in July of 2022 that accompanied the adult comprehensive dental benefit



implementation, and an 8.24% COLA increase in July of 2023, commenters shared that MaineCare members continue to experience long wait times for dental care. In July of 2024, the Department assessed previously established benchmarks for dental services in accordance with Rate Reform law. The benchmark assessment produced recommended rates that would have resulted in a net loss to providers given trends in commercial reimbursement in Maine; the Department instead held existing rates flat. Due to these findings, the Department determined the existing methodology may no longer be the most appropriate and committed to assessing whether we would be able to conduct a full rate determination ahead of the original five-year timetable. Due to ongoing dental access issues, it is our goal to conduct a full rate determination for all Dental Services in CY 2026, one year ahead of the five-year timetable. OMS will continue to work closely with the Dental Sub-Committee of the MaineCare Advisory Committee (MAC) on other factors that may deter new providers from enrolling or impact access to care. To date, this work has included streamlining the prior authorization and enrollment processes and strategizing on other ways to support providers in successfully serving MaineCare members and reducing administrative burden.

- One commenter requested additional transparency around the status of specific rate determinations and anticipated implementation timelines. The Department agrees that it can improve transparency and will work directly with the MAC Rate System Reform Subcommittee to revise public facing materials to include a greater level of detail, acknowledging that the rate determination process is separate from the schedule for implementation of adjustments and assessment of available funding. We intend for the improved transparency to flow through to status reports, as well as the OMS rate system reform [webpage](#). Once these improvements are established, the Department will plan to include this additional detail in the CY26 Schedule.
- Lastly, there were two public comments on the rate determination and service design processes. One commenter reminds the Department that although PNMI Appendices E & F services have similarities, it is important that we understand the differences and unique challenges between the two and ensure equal provider engagement during the service model design phase. A second commenter explains that having new rates without the rules in place for the impacted services creates uncertainty for providers about whether or not they can commit to providing the services.

Finally, based on additional internal review and discussion of access issues raised by providers and members in other operational contexts, the Department plans to begin the procurement process for a vendor to conduct a rate determination for durable medical equipment services that are not covered or benchmarked to Medicare rates. These services have not yet undergone a rate determination. With this, the Department expects these services to be included in the CY 2026 rate schedule.

In the final schedule, you will also note some changes to what was originally proposed. Section 97, Appendix D: Temporary High Intensity Services and Section 107, Psychiatric Residential Treatment Facility rate determinations have now been completed. The rate determination for Section 5, Ambulance Services was proposed to align with a Governor's budget initiative, which

ultimately was not approved by the legislature, so it has been removed from the CY25 schedule. As always, there are likely to be further changes to this schedule depending on the final outcomes of legislation and budget initiatives from this session, and potentially in response to the changing federal landscape and other factors.

We remain committed to our goal of ensuring all MaineCare services undergo fair, transparent, and timely rate reform processes. We appreciate your contributions to this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Michelle Probert", written in a cursive style.

Michelle Probert
Director, Office of MaineCare Services.

MaineCare Annual Rate Determination Schedule: Rate Determinations in Progress or to be Initiated in Calendar Year 2025

Initiated/In Progress
46, Psychiatric Hospitals (IMDs)
30 - Family Planning (New Alternative Payment Model)
TBD - Crisis Mobile Response Teams
12, 18, 19, 20, 21, 29, 40, 96, and 102 - Home & Community Based Services (HCBS): Clinical, Therapy, Care Coordination, Supportive Skills Building, Assistive Technology and Personal Support Services
18, 20, 21, 29 - Home & Community Based Services (HCBS) for Individuals with Intellectual & Developmental Disabilities or Autism & New Lifespan Waiver
TBD - Community Paramedicine
93 - Opioid Health Home, Including New Model for Other Substance Use Disorders
TBD - Palliative Care
Ch. VI, Section 3 - Primary Care Plus (PCPlus)
80 - Pharmacy Services: Pharmacy Dispensing Fees
Ch. I, Section 1, Interpreter Services
97 C - Private Non-Medical Institution, Appendix C: Medical Remedial Service Facilities (RCFs)
67 - Nursing Facilities - Specialty Units
In Progress - Service Model Design
97 E & F - Community Residences for Persons with Mental Illness (PNMI E) and Non-Case Mixed Medical and Remedial Facilities (PNMI F)
TBD - Coordinated Specialty Care
Completed in CY25
97 D - Private Non-Medical Institution, Appendix D: Temporary High Intensity Services
107 – Psychiatric Residential Treatment Facilities
Upcoming for CY25
65, 106 - Multi-Dimensional Family Therapy (65) & School-based Health Center Services & Early Intervention (106)
55 - Laboratory Services
43 - Hospice Services
45 - Hospitals (Professional Reimbursement)

*In each row, the number shown is the section of the [MaineCare Benefits Manual \(MBM\)](#), followed by the name of the section, then any specific services within the section, if applicable.