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## **Background**

An opportunity for improvement has been identified within the Wyoming Medicaid State Plan, Section 4, Program Administration. An internal indexing of fee schedule effective date language in SPA has identified at least fifteen separate pages that contain links to fee schedules, and corresponding fee schedule effective dates. As the state plan serves as the basis for FFP, CMS indicates that it must provide an auditable basis for determining whether payments are appropriate and without error.<sup>1</sup> CMS recognizes three approaches that states may use to satisfy the comprehensiveness requirement for fee schedules and payment methodologies. States may: 1) include the actual provider rates in the plan; or 2) describe the precise formula by which rates are set; or 3) identify the effective date of the schedule along with the published location of the fee schedule.<sup>2</sup> CMS also requires that when adjustments to a fee schedule occur, the state must submit a SPA to change its effective date.

## **State Plan Amendment**

Wyoming Medicaid will propose to adopt a single “frontispiece” page within Section 4 of the State Plan. This page will list all Medicaid fee schedules along with their corresponding effective dates, consolidating updates onto a prominent location on the Wyoming Department of Health <https://health.wyo.gov/> website. By centralizing this information, the number of pages that must be amended during routine rate changes would be minimized. This strategy has been implemented by numerous states and has been cited by CMS as a permissible method for fee schedule maintenance in SPA.<sup>3</sup>

## **Implementation & Impacts**

Implementation would begin with submission of a SPA striking all existing references to fee schedule effective dates and hyperlinks throughout the plan. These would be replaced with standardized language such as:

*“Wyoming Medicaid fee schedules are available at Attachment XX to Section 4 of the Wyoming Medicaid State Plan. Each fee schedule revision is effective for services provided on or after the date specified on Attachment XX.”* Under the same submission, a new state plan page would be adopted containing the frontispiece. This page would serve as the single authoritative source for all fee schedules, their effective dates, and the links to the published schedules.

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<sup>1</sup> 42 C.F.R. § 430.10, *The State Plan* (2025).

<https://www.ecfr.gov/current/title-42/chapter-IV/subchapter-C/part-430/subpart-B/section-430.10>

<sup>2</sup> Medicaid.gov. (n.d.). *Federal requirements for payment methodologies* [Word document]. Retrieved from <https://www.medicaid.gov/state-resource-center/downloads/spa-and-1915-waiver-processing/fed-req-pymt-methodologies.docx>

<sup>3</sup> State Plan Amendment MT 25-0001: Dates for Establishing Payment Rates, Attachment 4.19B (2025). Retrieved from <https://www.medicaid.gov/medicaid/spa/downloads/MT-25-0001.pdf>