

**CENTERS FOR MEDICARE & MEDICAID SERVICES
EXPENDITURE AUTHORITY**

NUMBER: 11-W00362/10

TITLE: Oregon Health Plan Substance Use Disorder 1115 Demonstration

AWARDEE: Oregon Health Authority

Under the authority of section 1115(a)(2) of the Social Security Act (“the Act”), expenditures made by Oregon for the items identified below, which are not otherwise included as expenditures under section 1903 of the Act shall, for the period from March 31, 2021 through March 31, 2026, unless otherwise specified, be regarded as expenditures under the state’s title XIX plan.

As discussed in the Centers for Medicare & Medicaid Services’ (CMS) approval letter, the Secretary of Health and Human Services has determined that the Oregon Health Plan Substance Use Disorder demonstration, including the granting of the expenditure authority described below, is likely to assist in promoting the objectives of title XIX of the Act.

The following expenditure authority may only be implemented consistent with the approved Special Terms and Conditions (STC) and shall enable Oregon to operate the above-identified section 1115(a) demonstration.

- 1. Residential and Inpatient Treatment for Individuals with Substance Use Disorder (SUD).** Expenditures for otherwise covered Medicaid services furnished to otherwise eligible individuals who are primarily receiving treatment and withdrawal management services for substance use disorder (SUD) who are short-term residents in facilities that meet the definition of an institution for mental diseases (IMD).

- 2. Community Integration Services (CIS).** Expenditures for community integration services which consists of housing transition and tenancy sustaining and employment supports to assist individuals transitioning back into the community from an inpatient or other residential setting where they have received SUD treatment.

**CENTERS FOR MEDICARE & MEDICAID SERVICES
SPECIAL TERMS AND CONDITIONS**

NUMBER: 11-W-00362/10

TITLE: Oregon Health Plan Substance Use Disorder 1115 Demonstration

AWARDEE: Oregon Health Authority

I. PREFACE

The following are the Special Terms and Conditions (STC) for the “Oregon Health Plan Substance Use Disorder” section 1115(a) Medicaid demonstration (hereinafter “demonstration”), to enable the Oregon Health Authority (hereinafter “state”) to operate this demonstration. The Centers for Medicare & Medicaid Services (CMS) has granted expenditure authority authorizing federal matching of demonstration costs not otherwise matchable, which are separately enumerated. These STCs set forth conditions and limitations on the expenditure authority, and describe in detail the nature, character, and extent of federal involvement in the demonstration and the state’s obligations to CMS related to the demonstration. These STCs neither grant additional waivers or expenditure authorities, nor expand upon those separately granted. The demonstration will be statewide and is approved for a five-year period, from April 8, 2021 through March 31, 2026, unless otherwise specified.

The STCs have been arranged into the following subject areas:

- I. Preface
- II. Program Description and Objectives
- III. General Program Requirements
- IV. Eligibility and Enrollment
- V. Substance Use Disorder Program and Benefits
- VI. High Needs Supports
- VII. Cost Sharing
- VIII. Delivery System
- IX. General Reporting Requirements
- X. Monitoring
- XI. Evaluation of the Demonstration
- XII. General Financial Requirements Under Title XIX
- XIII. Monitoring Budget Neutrality for the Demonstration
- XIV. Schedule of Deliverables for the Demonstration Period

Additional attachments have been included to provide supplementary information and guidance for specific STCs.

- Attachment A: Developing the Evaluation Design
- Attachment B: Preparing the Interim and Summative Evaluation Reports
- Attachment C: SUD Implementation Plan and SUD Health IT Plan
- Attachment D: Reserved

II. PROGRAM DESCRIPTION AND OBJECTIVES

This demonstration will provide the state with authority to provide high-quality, clinically appropriate treatment to beneficiaries with substance use disorder (SUD) while they are short-term residents in residential and inpatient treatment settings that qualify as Institutions for Mental Diseases (IMDs). It will also support state efforts to implement models of care focused on increasing support for individuals in the community and home, outside of institutions, and improve access to a continuum of SUD evidence-based services at varied levels of intensity. This continuum of care shall be based on the American Society of Addiction Medicine (ASAM) criteria and/or other nationally recognized assessment and placement tools that reflect evidence-based clinical treatment guidelines. This demonstration will also allow the state to provide community integration services which consists of housing and employment supports to individuals transitioning back into the community from an IMD or other residential setting.

During the demonstration period, the state seeks to achieve the following goals:

SUD Demonstration Goals:

1. Assist Oregon in increasing identification, initiation, and engagement of Medicaid beneficiaries diagnosed with SUD;
2. Assist the state in increasing beneficiary adherence to, and retention in, SUD treatment programs;
3. Assist Oregon in reducing inappropriate or preventable utilization of emergency departments and inpatient hospital settings through improved access to a continuum of care services; and
4. Provide a continuum of care to increase the chances of Medicaid beneficiaries of having a successful recovery process.

III. GENERAL PROGRAM REQUIREMENTS

- 1. Compliance with Federal Non-Discrimination Statutes.** The state must comply with all applicable federal statutes relating to non-discrimination. These include, but are not limited to, the Americans with Disabilities Act of 1990 (ADA), Title VI of the Civil Rights Act of 1964, section 504 of the Rehabilitation Act of 1973 (Section 504), the Age Discrimination Act of 1975, and section 1557 of the Patient Protection and Affordable Care Act (Section 1557).
- 2. Compliance with Medicaid and Children’s Health Insurance Program (CHIP) Law, Regulation, and Policy.** All requirements of the Medicaid and CHIP programs expressed in federal law, regulation, and policy statement, not expressly waived or identified as not applicable in the waiver and expenditure authority documents (of which these terms and conditions are part), apply to the demonstration.

- 3. Changes in Medicaid and CHIP Law, Regulation, and Policy.** The state must, within the timeframes specified in federal law, regulation, or written policy, come into compliance with any changes in law, regulation, or policy affecting the Medicaid or CHIP programs that occur during this demonstration approval period, unless the provision being changed is expressly waived or identified as not applicable. In addition, CMS reserves the right to amend the STCs to reflect such changes and/or changes as needed without requiring the state to submit an amendment to the demonstration under STC 7. CMS will notify the state thirty (30) business days in advance of the expected approval date of the amended STCs to allow the state to provide comment. Changes will be considered in force upon issuance of the approval letter by CMS. The state must accept the changes in writing.
- 4. Impact on Demonstration of Changes in Federal Law, Regulation, and Policy.**
 - a. To the extent that a change in federal law, regulation, or policy requires either a reduction or an increase in federal financial participation (FFP) for expenditures made under this demonstration, the state must adopt, subject to CMS approval, a modified budget neutrality agreement as necessary to comply with such change, as well as a modified allotment neutrality worksheet as necessary to comply with such change. The trend rates for the budget neutrality agreement are not subject to change under this subparagraph. Further, the state may seek an amendment to the demonstration (as per STC 7) as a result of the change in FFP.
 - b. If mandated changes in the federal law require state legislation, unless otherwise prescribed by the terms of the federal law, the changes must take effect on the earlier of the day such state legislation becomes effective, or on the last day such legislation was required to be in effect under the law, whichever is sooner.
- 5. State Plan Amendments.** The state will not be required to submit title XIX or XXI state plan amendments (SPAs) for changes affecting any populations made eligible solely through the demonstration. If a population eligible through the Medicaid or CHIP state plan is affected by a change to the demonstration, a conforming amendment to the appropriate state plan is required, except as otherwise noted in these STCs. In all such cases, the Medicaid and CHIP state plans govern.
- 6. Changes Subject to the Amendment Process.** Changes related to eligibility, enrollment, benefits, beneficiary rights, delivery systems, cost sharing, sources of non-federal share of funding, budget neutrality, and other comparable program elements must be submitted to CMS as amendments to the demonstration. All amendment requests are subject to approval at the discretion of the Secretary in accordance with section 1115 of the Act. The state must not implement changes to these elements without prior approval by CMS either through an approved amendment to the Medicaid or CHIP state plan or amendment to the demonstration. Amendments to the demonstration are not retroactive and no FFP of any kind, including for administrative or medical assistance expenditures, will be available under changes to the demonstration that have not been approved through the amendment process set forth in STC 7 below, except as provided in STC 3.
- 7. Amendment Process.** Requests to amend the demonstration must be submitted to CMS prior to the planned date of implementation of the change and may not be implemented until

approved. CMS reserves the right to deny or delay approval of a demonstration amendment based on non-compliance with these STCs, including but not limited to the failure by the state to submit required elements of a complete amendment request as described in this STC, and failure by the state to submit required reports and other deliverables according to the deadlines specified therein. Amendment requests must include, but are not limited to, the following:

- a. An explanation of the public process used by the state, consistent with the requirements of STC 12. Such explanation must include a summary of any public feedback received and identification of how this feedback was addressed by the state in the final amendment request submitted to CMS;
- b. A detailed description of the amendment, including impact on beneficiaries, with sufficient supporting documentation;
- c. A data analysis which identifies the specific “with waiver” impact of the proposed amendment on the current budget neutrality agreement. Such analysis must include current total computable “with waiver” and “without waiver” status on both a summary and detailed level through the current approval period using the most recent actual expenditures, as well as summary and detailed projections of the change in the “with waiver” expenditure total as a result of the proposed amendment, which isolates (by Eligibility Group) the impact of the amendment;
- d. An up-to-date CHIP allotment worksheet, if necessary;
- e. The state must provide updates to existing demonstration reporting and quality and evaluation plans. This includes a description of how the evaluation design and annual progress reports will be modified to incorporate the amendment provisions, as well as the oversight, monitoring and measurement of the provisions.

8. Extension of the Demonstration. States that intend to request an extension of the demonstration must submit an application to CMS from the Governor or Chief Executive Officer of the state in accordance with the requirements of 442 Code of Federal Regulations (CFR) 431.412(c). States that do not intend to request an extension of the demonstration beyond the period authorized in these STCs must submit phase-out plan consistent with the requirements of STC 9.

9. Demonstration Phase-Out. The state may only suspend or terminate this demonstration in whole, or in part, consistent with the following requirements.

- a. Notification of Suspension or Termination. The state must promptly notify CMS in writing of the reason(s) for the suspension or termination, together with the effective date and a transition and phase-out plan. The state must submit a notification letter and a draft transition and phase-out plan to CMS no less than six months before the effective date of the demonstration’s suspension or termination. Prior to submitting the draft transition and phase-out plan to CMS, the state must publish on its website the draft transition and phase-out plan for a thirty (30) day public comment period. In addition, the state must conduct tribal consultation in accordance with STC 12, if applicable. Once the thirty (30) day public comment period has ended, the state must provide a summary of the issues raised by the public during the comment period and how the state considered the comments received when developing the revised transition and phase-out plan.

- b. Transition and Phase-out Plan Requirements. The state must include, at a minimum, in its phase-out plan the process by which it will notify affected beneficiaries, the content of said notices (including information on the beneficiary's appeal rights), the process by which the state will conduct administrative reviews of Medicaid or CHIP eligibility prior to the termination of the demonstration for the affected beneficiaries, and ensure ongoing coverage for eligible beneficiaries, as well as any community outreach activities the state will undertake to notify affected beneficiaries, including community resources that are available.
- c. Transition and Phase-out Plan Approval. The state must obtain CMS approval of the transition and phase-out plan prior to the implementation of transition and phase-out activities. Implementation of transition and phase-out activities must be no sooner than fourteen (14) calendar days after CMS approval of the transition and phase-out plan.
- d. Transition and Phase-out Procedures. The state must comply with all applicable notice requirements found in 42 CFR, part 431 subpart E, including sections 431.206, 431.210 and 431.213. In addition, the state must assure all applicable appeal and hearing rights are afforded to beneficiaries in the demonstration as outlined in 42 CFR, part 431 subpart E, including sections 431.220 and 431.221. If a beneficiary in the demonstration requests a hearing before the date of action, the state must maintain benefits as required in 42 CFR §431.230. In addition, the state must conduct administrative renewals for all affected beneficiaries in order to determine if they qualify for Medicaid or CHIP eligibility under a different eligibility category prior to termination, as discussed in October 1, 2010, State Health Official Letter #10-008 and as required under 42 CFR 435.916(f)(1). For individuals determined ineligible for Medicaid, the state must determine potential eligibility for other insurance affordability programs and comply with the procedures set forth in 42 CFR 435.1200(e).
- e. Exemption from Public Notice Procedures 42 CFR Section 431.416(g). CMS may expedite the federal and state public notice requirements under circumstances described in 42 CFR 431.416(g).
- f. Enrollment Limitation during Demonstration Phase-Out. If the state elects to suspend, terminate, or not extend this demonstration, during the last six months of the demonstration, enrollment of new individuals into the demonstration must be suspended. The limitation of enrollment into the demonstration does not impact the state's obligation to determine Medicaid eligibility in accordance with the approved Medicaid state plan.
- g. Federal Financial Participation (FFP). If the project is terminated or any relevant waivers are suspended by the state, FFP must be limited to normal closeout costs associated with the termination or expiration of the demonstration including services, continued benefits as a result of beneficiaries' appeals, and administrative costs of disenrolling beneficiaries.

10. Withdrawal of Waiver or Expenditure Authority. CMS reserves the right to withdraw waivers and/or expenditure authorities at any time it determines that continuing the waiver or expenditure authorities would no longer be in the public interest or promote the objectives of title XIX and title XXI. CMS will promptly notify the state in writing of the determination

and the reasons for the withdrawal, together with the effective date, and afford the state an opportunity to request a hearing to challenge CMS' determination prior to the effective date. If a waiver or expenditure authority is withdrawn, FFP is limited to normal closeout costs associated with terminating the waiver or expenditure authority, including services, continued benefits as a result of beneficiary appeals, and administrative costs of disenrolling beneficiaries.

- 11. Adequacy of Infrastructure.** The state will ensure the availability of adequate resources for implementation and monitoring of the demonstration, including education, outreach, and enrollment; maintaining eligibility systems; compliance with cost sharing requirements; and reporting on financial and other demonstration components.
- 12. Public Notice, Tribal Consultation, and Consultation with Interested Parties.** The state must comply with the state notice procedures as required in 42 CFR section 431.408 prior to submitting an application to extend the demonstration. For applications to amend the demonstration, the state must comply with the state notice procedures set forth in 59 Fed. Reg. 49249 (September 27, 1994) prior to submitting such request. The state must also comply with the Public Notice Procedures set forth in 42 CFR 447.205 for changes in statewide methods and standards for setting payment rates.

The state must also comply with tribal and Indian Health Program/Urban Indian Organization consultation requirements at section 1902(a)(73) of the Act, 42 CFR 431.408(b), State Medicaid Director Letter #01-024, or as contained in the state's approved Medicaid State Plan, when any program changes to the demonstration, either through amendment as set out in STC 7 or extension, are proposed by the state.

- 13. Federal Financial Participation (FFP).** No federal matching funds for expenditures for this demonstration, including for administrative and medical assistance expenditures, will be available until the effective date identified in the demonstration approval letter, or if later, as expressly stated within these STCs.
- 14. Administrative Authority.** When there are multiple entities involved in the administration of the demonstration, the Single State Medicaid Agency must maintain authority, accountability, and oversight of the program. The State Medicaid Agency must exercise oversight of all delegated functions to operating agencies, MCOs, and any other contracted entities. The Single State Medicaid Agency is responsible for the content and oversight of the quality strategies for the demonstration.
- 15. Common Rule Exemption.** The state must ensure that the only involvement of human subjects in research activities that may be authorized and/or required by this demonstration is for projects which are conducted by or subject to the approval of CMS, and that are designed to study, evaluate, or otherwise examine the Medicaid or CHIP program – including public benefit or service programs, procedures for obtaining Medicaid or CHIP benefits or services, possible changes in or alternatives to Medicaid or CHIP programs and procedures, or possible changes in methods or levels of payment for Medicaid benefits or services. CMS has determined that this demonstration as represented in these approved STCs meets the

requirements for exemption from the human subject research provisions of the Common Rule set forth in 45 CFR 46.104(d)(5).

IV. ELIGIBILITY AND ENROLLMENT

16. Eligibility Groups Affected by the Demonstration. Under the demonstration, there is no change to Medicaid eligibility. Standards and methodologies for eligibility remain set forth under the state plan. This demonstration will apply to otherwise-eligible Medicaid beneficiaries residing in an IMD for diagnoses of substance use disorder (SUD).

V. SUBSTANCE USE DISORDER PROGRAM AND BENEFITS

17. SUD Program Benefits. Effective upon CMS' approval of the SUD Implementation Plan, the demonstration benefit package for Medicaid beneficiaries will include SUD treatment services, including services provided in residential and inpatient treatment settings that qualify as an IMD, which are not otherwise matchable expenditures under section 1903 of the Act. The state will be eligible to receive FFP for Medicaid beneficiaries who are short-term residents in IMDs under the terms of this demonstration for coverage of medical assistance, including OUD/SUD services that would otherwise be matchable if the beneficiary were not residing in an IMD once CMS approves the state's Implementation Plan. The state will aim for a statewide average length of stay of 30 days or less in residential treatment settings, to be monitored pursuant to the SUD Monitoring Protocol as outlined in STC 20, to ensure short-term residential stays.

Under this demonstration beneficiaries will have access to high quality, evidence-based OUD/SUD treatment services across a comprehensive continuum of care, ranging from residential and inpatient treatment to ongoing chronic care for these conditions in cost-effective community-based settings.

18. Community Integration Services. Under this demonstration, the state also intends to provide Community Integration Services (CIS) which consists of housing and employment supports to assist individuals who meet a risk factor identified in the CIS needs-based criteria. The state will be subject to the terms and conditions for these services as outlined in section VI.

19. SUD Implementation Plan and Health IT Plan.

- a. The state must submit the SUD Implementation Plan within ninety (90) calendar days after approval of this demonstration. The state must submit the revised SUD Implementation Plan within sixty (60) days after receipt of CMS's comments. The state may not claim FFP for services provided in IMDs to beneficiaries who are primarily receiving SUD treatment and withdrawal management services until CMS has approved the SUD Implementation Plan. Once approved, the SUD Implementation Plan will be incorporated into the STCs as Attachment C and, once incorporated, may be altered only with CMS approval. After approval of the applicable implementation plans required by these STCs, FFP will be available prospectively, not retrospectively.

- b. Failure to submit a SUD Implementation Plan will be considered a material failure to comply with the terms of the demonstration project as described in 42 CFR 431.420(d) and, as such, would be grounds for termination or suspension of the SUD program under this demonstration. Failure to progress in meeting the milestone goals agreed upon by the state and CMS will result in a funding deferral as described in STC 33.
- c. At a minimum, the SUD Implementation Plan must describe the strategic approach and detailed project implementation plan, including timetables and programmatic content where applicable, for meeting the following milestones which reflect the key goals and objectives for the program:
 - i. Access to Critical Levels of Care for OUD and other SUDs. Coverage of OUD/SUD treatment services across a comprehensive continuum of care including: outpatient; intensive outpatient; medication assisted treatment (medication as well as counseling and other services with sufficient provider capacity to meet needs of Medicaid beneficiaries in the state); intensive levels of care in residential and inpatient settings; and medically supervised withdrawal management, within 12-24 months of demonstration approval;
 - ii. Use of Evidence-based SUD-specific Patient Placement Criteria. Establishment of a requirement that providers assess treatment needs based on SUD-specific, multidimensional assessment tools, such as the American Society of Addiction Medicine (ASAM) Criteria or other assessment and placement tools that reflect evidence-based clinical treatment guidelines within 12-24 months of demonstration approval;
 - iii. Patient Placement. Establishment of a utilization management approach such that beneficiaries have access to SUD services at the appropriate level of care and that the interventions are appropriate for the diagnosis and level of care, including an independent process for reviewing placement in residential treatment settings within 12-24 months of demonstration approval;
 - iv. Use of Nationally Recognized SUD-specific Program Standards to set Provider Qualifications for Residential Treatment Facilities. The state must establish residential treatment provider qualifications in licensure, policy or provider manuals, managed care contracts or credentialing, or other requirements or guidance that meet program standards in the ASAM Criteria or other nationally recognized, SUD-specific program standards regarding in particular the types of services, hours of clinical care, and credentials of staff for residential treatment settings within 12-24 months of demonstration approval;
 - v. Standards of Care. Establishment of a provider review process to ensure that residential treatment providers deliver care consistent with the specifications in the ASAM Criteria or other comparable, nationally recognized SUD program standards based on evidence-based clinical treatment guidelines for types of services, hours of clinical care, and credentials of staff for residential treatment settings within 12-24 months of demonstration approval;
 - vi. Standards of Care. Establishment of a requirement that residential treatment providers offer MAT on-site or facilitate access to MAT off-site within 12-24 months of demonstration approval;

- vii. Sufficient Provider Capacity at each Level of Care including Medication Assisted Treatment for SUD/ODU. An assessment of the availability of providers in the critical levels of care throughout the state, or in the regions of the state participating under this demonstration, including those that offer MAT within 12 months of demonstration approval;
 - viii. Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and SUD/ODU. Implementation of opioid prescribing guidelines along with other interventions to prevent prescription drug abuse and expand coverage of and access to naloxone for overdose reversal as well as implementation of strategies to increase utilization and improve functionality of prescription drug monitoring programs;
 - ix. Improved Care Coordination and Transitions between levels of care. Establishment and implementation of policies to ensure residential and inpatient facilities link beneficiaries with community-based services and supports following stays in these facilities within 24 months of demonstration approval.
 - x. SUD Health IT Plan. Implementation of the milestones and metrics as detailed in STC 19(d).
- d. SUD Health Information Technology Plan (“Health IT Plan”). The SUD Health IT plan applies to all states where the Health IT functionalities are expected to impact beneficiaries within the demonstration. As outlined in SMDL #17-003, states must submit to CMS the applicable Health IT Plans, to be included as sections of the associated Implementation Plans (see STC 19 (a) and 19(c)), to develop infrastructure and capabilities consistent with the requirements outlined.

The Health IT Plan must detail the necessary health IT capabilities in place to support beneficiary health outcomes to address the SUD goals of the demonstration. The plan will also be used to identify areas of health IT ecosystem improvement. The Plan must include implementation milestones and projected dates for achieving them (see Attachment C), and must be aligned with the state’s broader State Medicaid Health IT Plan (SMHP) and, if applicable, the state’s Behavioral Health (BH) IT Health Plan.

- i. The state must include in its Monitoring Protocol (see STC 20) an approach to monitoring its SUD Health IT Plan, which will include performance metrics to be approved in advance by CMS.
- ii. The state must monitor progress, each DY, on the implementation of its SUD Health IT Plan in relationship to its milestones and timelines—and report on its progress to CMS in an addendum to its Annual Report (see STC 36).
- iii. As applicable, the state should advance the standards identified in the ‘Interoperability Standards Advisory—Best Available Standards and Implementation Specifications’ (ISA) in developing and implementing the state’s SUD Health IT policies and in all related applicable State procurements (e.g., including managed care contracts) that are associated with this demonstration.
- iv. Where there are opportunities at the state- and provider-level (up to and including usage in MCO or ACO participation agreements) to leverage federal funds associated with a standard referenced in 45 CFR 170 Subpart B, the

state should use the federally-recognized standards, barring another compelling state interest.

- v. Where there are opportunities at the state- and provider-level to leverage federal funds associated with a standard not already referenced in 45 CFR 170 but included in the ISA, the state should use the federally-recognized ISA standards, barring no other compelling state interest.
- vi. Components of the Health IT Plan include:
 - 1) The Health IT Plan must describe the state’s goals, each DY, to enhance the state’s prescription drug monitoring program (PDMP).¹
 - 2) The Health IT Plan must address how the state’s PDMP will enhance ease of use for prescribers and other state and federal stakeholders.² This must also include plans to include PDMP interoperability with a statewide, regional or local Health Information Exchange. Additionally, the SUD Health IT Plan must describe ways in which the state will support clinicians in consulting the PDMP prior to prescribing a controlled substance—and reviewing the patients’ history of controlled substance prescriptions—prior to the issuance of a Controlled Substance Schedule II (CSII) opioid prescription.
 - 3) The Health IT Plan will, as applicable, describe the state’s capabilities to leverage a master patient index (or master data management service, etc.) in support of SUD care delivery. Additionally, the Health IT Plan must describe current and future capabilities regarding PDMP queries—and the state’s ability to properly match patients receiving opioid prescriptions with patients in the PDMP. The state will also indicate current efforts or plans to develop and/or utilize current patient index capability that supports the programmatic objectives of the demonstration.
 - 4) The Health IT Plan will describe how the activities described in (i), (ii) and (iii) above will support broader state and federal efforts to diminish the likelihood of long-term opioid use directly correlated to clinician prescribing patterns.³
 - 5) The Health IT Plan will describe the state’s current and future capabilities to support providers implementing or expanding Health IT functionality in the following areas: 1) Referrals, 2) Electronic care plans and medical records, 3) Consent, 4) Interoperability, 5) Telehealth, 6) Alerting/analytics, and 7) Identity management.
 - 6) In developing the Health IT Plan, states should use the following resources:
 - 1. States may use federal resources available on Health IT.Gov (<https://www.healthit.gov/topic/behavioral-health>) including

¹ Prescription drug monitoring programs (PDMP) are electronic databases that track controlled substance prescriptions in states. PDMPs can provide health authorities timely information about prescribing and patient behaviors that contribute to the “opioid” epidemic and facilitate a nimble and targeted response.

² *Ibid.*

³ Shah, Anuj, Corey Hayes and Bradley Martin. *Characteristics of Initial Prescription Episodes and Likelihood of Long-Term Opioid Use — United States, 2006–2015*. MMWR Morb Mortal Wkly Rep 2017;66.

but not limited to “Behavioral Health and Physical Health Integration” and “Section 34: Opioid Epidemic and Health IT” (<https://www.healthit.gov/playbook/health-information-exchange/>).

2. States may also use the CMS 1115 Health IT resources available on “Medicaid Program Alignment with State Systems to Advance HIT, HIE and Interoperability” at <https://www.medicaid.gov/medicaid/data-and-systems/hie/index.html>. States should review the “1115 Health IT Toolkit” for health IT considerations in conducting an assessment and developing their Health IT Plans.
- 7) States may request from CMS technical assistance to conduct an assessment and develop plans to ensure they have the specific health IT infrastructure with regards to PDMP interoperability, electronic care plan sharing, care coordination, and behavioral health-physical health integration, to meet the goals of the demonstration.

20. SUD Monitoring Protocol. The state must submit a Monitoring Protocol for the SUD programs authorized by this demonstration within one hundred fifty (150) calendar days after approval of the demonstration. The Monitoring Protocol Template must be developed in cooperation with CMS and is subject to CMS approval. The state must submit a revised Monitoring Protocol within sixty (60) calendar days after receipt of CMS’ comments. Once approved, the SUD Monitoring Protocol will be incorporated into the STCs, as Attachment D. Progress on the performance measures identified in the Monitoring Protocol must be reported via the quarterly and annual monitoring reports. Components of the Monitoring Protocol include:

- a. An assurance of the state’s commitment and ability to report information relevant to each of the program implementation areas listed in STC 19(c) and reporting relevant information to the state’s Health IT plan described in STC 19(d);
- b. A description of the methods of data collection and timeframes for reporting on the state’s progress on required measures as part of the general reporting requirements described in Section IX of the demonstration; and
- c. A description of baselines and targets to be achieved by the end of the demonstration. Where possible, baselines will be informed by state data, and targets will be benchmarked against performance in best practice settings.

21. Evaluation. The SUD Evaluation will be subject to the same requirements as the overall demonstration evaluation, as described in Sections IX (General Reporting Requirements) and XI (Evaluation of the Demonstration) of these STCs.

VI. COMMUNITY INTEGRATION SERVICES

22. Overview. The state will provide a limited set of housing and employment supports to Medicaid beneficiaries with a SUD diagnosis, who also require assistance with activities of daily living (ADLs), or a complex physical health need who are transitioning out of an

inpatient or other residential setting. Qualifying beneficiaries must be expected to benefit from supports necessary to obtain and maintain stable housing.

23. CIS Benefits. The state will provide housing and employment supports otherwise allowable under a 1915(i) SPA, including the services below, and described in greater detail in Attachment F:

- a. Individual housing and pre-tenancy services, individual housing and tenancy sustaining services, and community transition services.
- b. Pre-employment and employment support services

24. CIS Eligibility. Medicaid beneficiaries who are eligible under the Medicaid state plan and who have a SUD diagnosis will be eligible for the benefits described in this section, provided they meet the needs-based criteria and risk factors, as outlined in Attachment F.

25. CIS Eligibility and Services. Eligibility and Services describes the services and requirements that would otherwise be documented in a 1915(i) SPA, including needs-based eligibility criteria, risk factors, covered services, service definitions, payment methodology, administrative approach, and minimum provider qualifications.

26. CIS Home and Community Based Services (HCBS) Requirements. For CIS HCBS, the state assures that its MCO Quality Assessment and Performance Improvement program must encompass long-term services and supports (LTSS) specific measures set forth in the federal managed care rule at 42 CFR 438.330, and will assess and improve performance as described below in the following areas:

- a. Administrative Authority: A performance measure must be developed and tracked for authorities that the State Medicaid Agency (SMA) delegates to another agency or MCOs, unless already captured in another performance measure, including: the review and monitoring of interagency agreements (IAG)/contract evaluations and the MCO quality management review (QMR) reports submitted in accordance with requirements. The SMA is responsible for operations and oversight, and will monitor and track the MCOs' delegated activities.
- b. Eligibility Based on 1115 Requirements: A performance measure is required for the following: tracking of all new enrollees who receive an evaluation for HCBS eligibility prior to receiving services. While a performance measure to track annual eligibility determinations is not required since the state is not required to report to CMS, the state is expected to ensure annual eligibility determinations are completed.
- c. Qualified Providers: The state must have performance measures that track that providers meet licensure/certification standards, that non-certified providers are monitored to assure adherence to demonstration requirements, and that the state verifies that training is given to providers in accordance with the demonstration.
- d. Service Plan: The state must demonstrate it has designed and implemented an effective system for reviewing the adequacy of service plans for HCBS participants. Performance measures are required for individuals who have support plans that address their assessed needs, capabilities and desired outcomes; individuals whose service plan was updated/revised at least annually; and individual records that

- indicate that a risk assessment was completed as required.
- e. Health and Welfare: The state must assure that it has designed and implemented an effective system for assuring HCBS participants' health and welfare. The state must have performance measures that track participants for whom critical incidents were reported in which appropriate action was taken; unexplained deaths in which appropriate action was taken; and critical incidents reported to the MCO within the required timeframes.
 - f. Financial Accountability: The state must demonstrate that it has designed and implemented an adequate system for ensuring financial accountability of the HCBS program. The state must demonstrate actuarial soundness on an annual basis pursuant to 42 CFR 438.
 - g. HCBS Settings Requirements: The state must assure compliance with the HCBS settings requirements for those services that could be authorized under section 1915(i) in accordance with 42 CFR 441.710.

27. CIS Reporting. The state must submit a report to CMS as an attachment to its quarterly and annual monitoring reports described in STC 36 that includes performance measure evidence of compliance at or above 86 percent with the HCBS quality assurances and measures.

28. CIS Reporting Deficiencies. The state must report, as an attachment to its quarterly and annual monitoring report described in STC 36 the deficiencies found below 86 percent compliance during the monitoring and evaluation of the HCBS demonstration assurances, an explanation of how these deficiencies have been or are being corrected, as well as the steps that have been taken to ensure that these deficiencies do not reoccur. The state must also report on the number of substantiated instances of abuse, neglect, exploitation and/or death, the actions taken regarding the incidents, and how they were resolved.

29. CIS Beneficiary Protections.

- a. The state assures there is a person-centered service plan for each individual determined to be eligible for HCBS. The person-centered service plan is developed using a person-centered service planning process in accordance with 42 CFR 441.725(a), and the written person-centered service plan meets federal requirement at 42 CFR 441.725(b). The person-centered service plan is reviewed, and revised upon reassessment of functional need as required by 42 CFR 441.725(c), at least every 12 months, when the individual's circumstances or needs change significantly, or at the request of the individual.
- b. The state agrees that the entity that authorizes the services is external to the agency or agencies that provide the HCBS services. The state also agrees that appropriate separation of assessment, treatment planning and service provision functions are incorporated into the state's conflict of interest policies.
- c. The state, either directly or through its MCO contracts, must ensure that participants' engagement and community participation is supported to the fullest extent desired by each participant.
- d. Beneficiaries may change MCOs if their residential or employment support provider is no longer available through their current plan.

VII. COST SHARING

30. Cost Sharing. Cost sharing imposed upon individuals enrolled in the demonstration is consistent with the provisions of the approved state plan.

VIII. DELIVERY SYSTEM

31. Delivery System. All demonstration beneficiaries will continue to receive services through the same delivery system arrangements as currently authorized in the state.

IX. GENERAL REPORTING REQUIREMENTS

32. Deferral for Failure to Submit Timely Demonstration Deliverables. CMS may issue deferrals in accordance with 42 CFR part 430 subpart C, in the amount of \$5,000,000 per deliverable (federal share) when items required by these STCs (e.g., required data elements, analyses, reports, design documents, presentations, and other items specified in these STCs) (hereafter singly or collectively referred to as “deliverable(s)”) are not submitted timely to CMS or are found to not be consistent with the requirements approved by CMS. A deferral shall not exceed the value of the federal amount for the current demonstration period. The state does not relinquish its rights provided under 42 CFR part 430 subpart C to challenge any CMS finding that the state materially failed to comply with the terms of this agreement. The following process will be used: 1) Thirty (30) days after the deliverable was due if the state has not submitted a written request to CMS for approval of an extension as described in subsection (b) below; or 2) Thirty (30) days after CMS has notified the state in writing that the deliverable was not accepted for being inconsistent with the requirements of this agreement and the information needed to bring the deliverable into alignment with CMS requirements:

- a. CMS will issue a written notification to the state providing advance notification of a pending deferral for late or non-compliant submissions of required deliverable(s).
- b. For each deliverable, the state may submit to CMS a written request for an extension to submit the required deliverable that includes a supporting rationale for the cause(s) of the delay and the state’s anticipated date of submission. Should CMS agree to the state’s request, a corresponding extension of the deferral process can be provided. CMS may agree to a corrective action plan submitted by the state as an interim step before applying the deferral, if the state proposes a corrective action plan in the state’s written extension request.
- c. If CMS agrees to an interim corrective plan in accordance with subsection (b), and the state fails to comply with the corrective action plan or, despite the corrective action plan, still fails to submit the overdue deliverable(s) with all required contents in satisfaction of the terms of this agreement, CMS may proceed with the issuance of a deferral against the next Quarterly Statement of Expenditures reported in Medicaid Budget and Expenditure System/State Children's Health Insurance Program Budget and Expenditure System (MBES/CBES) following a written deferral notification to the state.
- d. If the CMS deferral process has been initiated for state non-compliance with the terms of this agreement with respect to required deliverable(s), and the state submits

the overdue deliverable(s), and such deliverable(s) are accepted by CMS as meeting the requirements specified in these STCs, the deferral(s) will be released.

- e. As the purpose of a section 1115 demonstration is to test new methods of operation or service delivery, a state's failure to submit all required reports, evaluations and other deliverables will be considered by CMS in reviewing any application for an extension, amendment, or for a new demonstration.

33. Deferral of Federal Financial Participation (FFP) from IMD Claiming for Insufficient Progress Toward Milestones. Up to \$5,000,000 in FFP for services in IMDs may be deferred if the state is not making adequate progress on meeting the milestones and goals as evidenced by reporting on the milestones in the Implementation Plans and the required performance measures in the Monitoring Plan agreed upon by the state and CMS. Once CMS determines the state has not made adequate progress, up to \$5,000,000 will be deferred in the next calendar quarter and each calendar quarter thereafter until CMS has determined sufficient progress has been made.

34. Submission of Post-Approval Deliverables. The state must submit all deliverables as stipulated by CMS and within the timeframes outlined within these STCs.

35. Compliance with Federal Systems Updates. As federal systems continue to evolve and incorporate additional 1115 demonstration reporting and analytics functions, the state will work with CMS to:

- a. Revise the reporting templates and submission processes to accommodate timely compliance with the requirements of the new systems;
- b. Ensure all 1115, T-MSIS, and other data elements that have been agreed to for reporting and analytics are provided by the state; and
- c. Submit deliverables to the appropriate system as directed by CMS.

X. MONITORING

36. Monitoring Reports. The state must submit three (3) Quarterly Monitoring Reports and one (1) Annual Monitoring Report each DY. The fourth quarter information that would ordinarily be provided in a separate report should be reported as distinct information within the Annual Report. The Quarterly Monitoring Reports are due no later than sixty (60) calendar days following the end of each demonstration quarter. The Annual Monitoring Report is due no later than ninety (90) calendar days following the end of the DY. The reports will include all required elements as per 42 CFR 431.428, and should not direct readers to links outside the report. Additional links not referenced in the document may be listed in a Reference/Bibliography section. The Monitoring Reports must follow the framework provided by CMS, which is subject to change as monitoring systems are developed/evolve, and be provided in a structured manner that supports federal tracking and analysis.

- a. Operational Updates. The operational updates will focus on progress toward meeting the demonstration's milestones. Additionally, per 42 CFR 431.428, the Monitoring Reports must document any policy or administrative difficulties in operating the demonstration. The reports shall provide sufficient information to document key

- challenges, underlying causes of challenges, how challenges are being addressed, as well as key achievements and to what conditions and efforts successes can be attributed. The discussion should also include any issues or complaints identified by beneficiaries; lawsuits or legal actions; unusual or unanticipated trends; legislative updates; and descriptions of any public forums held. The Monitoring Report should also include a summary of all public comments received through post-award public forums regarding the progress of the demonstration.
- b. Performance Metrics. The performance metrics will provide data to demonstrate how the state is progressing towards meeting the demonstration's milestones. Additionally, per 42 CFR 431.428, the Monitoring Reports must document the impact of the demonstration in providing insurance coverage to beneficiaries and the uninsured population, as well as outcomes of care, quality and cost of care, and access to care. This may also include the results of beneficiary satisfaction surveys, if conducted, grievances and appeals. The required monitoring and performance metrics must be included in writing in the Monitoring Reports, and will follow the framework provided by CMS to support federal tracking and analysis.
 - c. Budget Neutrality and Financial Reporting Requirements. Per 42 CFR 431.428, the Monitoring Reports must document the financial performance of the demonstration. The state must provide an updated budget neutrality workbook with every Monitoring Report that meets all the reporting requirements for monitoring budget neutrality set forth in the General Financial Requirements Section XII of these STCs, including the submission of corrected budget neutrality data upon request. In addition, the state must report quarterly and annual expenditures associated with the populations affected by this demonstration on the Form CMS-64. Administrative costs should be reported separately.
 - d. Evaluation Activities and Interim Findings. Per 42 CFR 431.428, the Monitoring Reports must document any results of the demonstration to date per the evaluation hypotheses. Additionally, the state shall include a summary of the progress of evaluation activities, including key milestones accomplished, as well as challenges encountered and how they were addressed.
 - e. SUD Health IT. The state will include a summary of progress made in regards to SUD Health IT requirements outlined in STC 19(d).

37. SUD Mid-Point Assessment. The state must conduct an independent mid-point assessment by September 30, 2023. In the design, planning and conduction of the mid-point assessment, the state must require that the independent assessor consult with key stakeholders including, but not limited to: representatives of MCOs, SUD treatment providers, beneficiaries, and other key partners. The state must require that the assessor provide a report to the state that includes the methodologies used for examining progress and assessing risk, the limitations of the methodologies, its determinations and any recommendations. The state must provide a copy of the report to CMS no later than sixty (60) days after September 30, 2023. This timeline will allow for the assessment report to capture approximately the first two-and-a-half years of demonstration program data, accounting for data run-out and data completeness. The state must brief CMS on the report.

For milestones and measure targets at medium to high risk of not being achieved, the state must submit to CMS modifications to the SUD Implementation Plan, and the SUD Monitoring Protocol for ameliorating these risks. Modifications to the applicable Implementation, Financing, and Monitoring Protocol are subject to CMS approval. Elements of the mid-point assessment include:

- a. An examination of progress toward meeting each milestone and timeframe approved in the SUD Implementation Plans and toward meeting the targets for performance measures as approved in the SUD Monitoring Protocol;
- b. A determination of factors that affected achievement on the milestones and performance measure gap closure percentage points to date;
- c. A determination of selected factors likely to affect future performance in meeting milestones and targets not yet met and information about the risk of possibly missing those milestones and performance targets;
- d. For milestones or targets at medium to high risk of not being met, recommendations for adjustments in the state's SUD Implementation Plan or to pertinent factors that the state can influence that will support improvement; and
- e. An assessment of whether the state is on track to meet the budget neutrality requirements.

38. Corrective Action. If monitoring indicates that demonstration features are not likely to assist in promoting the objectives of Medicaid, CMS reserves the right to require the state to submit a corrective action plan to CMS for approval. This may be an interim step to withdrawing waivers or expenditure authorities, as outlined in STC 10.

39. Close-Out Report. Within one hundred twenty (120) calendar days after the expiration of the demonstration, the state must submit a Draft Close-Out Report to CMS for comments.

- a. The draft close-out report must comply with the most current guidance from CMS.
- b. The state will present to and participate in a discussion with CMS on the close-out report.
- c. The state must take into consideration CMS' comments for incorporation into the final close-out report.
- d. The final close-out report is due to CMS no later than thirty (30) calendar days after receipt of CMS' comments.
- e. A delay in submitting the draft or final version of the close-out report may subject the state to penalties described in STC 32.

40. Monitoring Calls. CMS will convene periodic conference calls with the state.

- a. The purpose of these calls is to discuss ongoing demonstration operation, to include (but not limited to) any significant actual or anticipated developments affecting the demonstration. Examples include implementation activities, trends in reported data on metrics and associated mid-course adjustments, enrollment and access, budget neutrality, and progress on evaluation activities.
- b. CMS will provide updates on any pending actions, as well as federal policies and issues that may affect any aspect of the demonstration.
- c. The state and CMS will jointly develop the agenda for the calls.

41. Post Award Forum. Pursuant to 42 CFR 431.420(c), within six (6) months of the demonstration's implementation, and annually thereafter, the state must afford the public with an opportunity to provide meaningful comment on the progress of the demonstration. At least thirty (30) days prior to the date of the planned public forum, the state must publish the date, time and location of the forum in a prominent location on its website. The state must also post the most recent annual report on its website with the public forum announcement. Pursuant to 42 CFR 431.420(c), the state must include a summary of the comments in the Monitoring Report associated with the quarter in which the forum was held, as well as in its compiled Annual Report.

XI. EVALUATION OF THE DEMONSTRATION

42. Cooperation with Federal Evaluators. As required under 42 CFR 431.420(f), the state must cooperate fully and timely with CMS and its contractors in any federal evaluation of the demonstration or any component of the demonstration. This includes, but is not limited to, commenting on design and other federal evaluation documents and providing data and analytic files to CMS, including entering into a data use agreement that explains how the data and data files will be exchanged, and providing a technical point of contact to support specification of the data and files to be disclosed, as well as relevant data dictionaries and record layouts. The state must include in its contracts with entities who collect, produce or maintain data and files for the demonstration, that they must make such data available for the federal evaluation as is required under 42 CFR 431.420(f) to support federal evaluation. The state may claim administrative match for these activities. Failure to comply with this STC may result in a deferral being issued as outlined in STC 32.

43. Independent Evaluator. Upon approval of the demonstration, the state must begin to arrange with an independent party to conduct an evaluation of the demonstration to ensure that the necessary data is collected at the level of detail needed to research the approved hypotheses. The state must require the independent party to sign an agreement that the independent party will conduct the demonstration evaluation in an independent manner in accordance with the CMS-approved draft Evaluation Design. When conducting analyses and developing the evaluation reports, every effort should be made to follow the approved methodology. However, the state may request, and CMS may agree to, changes in the methodology in appropriate circumstances.

44. Draft Evaluation Design. The draft Evaluation Design must be developed in accordance with Attachment A (Developing the Evaluation Design) of these STCs. The state must submit, for CMS comment and approval, a draft Evaluation Design with implementation timeline, no later than one hundred eighty (180) days after the approval of the demonstration. Any modifications to an existing approved Evaluation Design will not affect previously established requirements and timelines for report submission for the demonstration, if applicable. The draft Evaluation Design must be developed in accordance with the following CMS guidance (including but not limited to):

- a. All applicable Evaluation Design guidance, including guidance about SUD. Hypotheses applicable to the demonstration as a whole, and to all key policies referenced above, will include (but will not be limited to): the effects of the

demonstration on health outcomes; the financial impact of the demonstration (for example, such as an assessment of medical debt and uncompensated care costs).

- b. Attachment A (Developing the Evaluation Design) of these STCs, technical assistance for developing SUD Evaluation Designs (as applicable, and as provided by CMS), and all applicable technical assistance on how to establish comparison groups to develop a Draft Evaluation Design.

45. Evaluation Budget. A budget for the evaluations must be provided with the draft Evaluation Designs. It will include the total estimated cost, as well as a breakdown of estimated staff, administrative and other costs for all aspects of the evaluations such as any survey and measurement development, quantitative and qualitative data collection and cleaning, analyses and report generation. A justification of the costs may be required by CMS if the estimates provided do not appear to sufficiently cover the costs of the design or if CMS finds that the designs are not sufficiently developed, or if the estimates appear to be excessive.

46. Evaluation Design Approval and Updates. The state must submit the revised draft Evaluation Designs within sixty (60) calendar days after receipt of CMS' comments. Upon CMS approval of the draft Evaluation Designs, the documents will be included as an attachment to these STCs. Per 42 CFR 431.424(c), the state will publish the approved Evaluation Design to the state's website within thirty (30) calendar days of CMS approval. The state must implement the evaluation designs and submit a description of its evaluation implementation progress in each of the Monitoring Reports, including any required Rapid Cycle Assessments specified in these STCs. Once CMS approves the evaluation designs, if the state wishes to make changes, the state must submit a revised evaluation design to CMS for approval.

47. Evaluation Questions and Hypotheses. Consistent with Attachments A and B (Developing the Evaluation Design and Preparing the Interim and Summative Evaluation Report) of these STCs, the evaluation documents must include a discussion of the evaluation questions and hypotheses that the state intends to test. Each demonstration component should have at least one evaluation question and hypothesis. The hypothesis testing should include, where possible, assessment of both process and outcome measures. Proposed measures should be selected from nationally-recognized sources and national measures sets, where possible. Measures sets could include CMS's Core Set of Health Care Quality Measures for Children in Medicaid and CHIP, Consumer Assessment of Health Care Providers and Systems (CAHPS), the Initial Core Set of Health Care Quality Measures for Medicaid-Eligible Adults and/or measures endorsed by National Quality Forum (NQF).

48. Interim Evaluation Report. The state must submit an Interim Evaluation Report for each evaluation design, as applicable, and for the completed years of the demonstration, and for each subsequent renewal or extension of the demonstration, as outlined in 42 CFR 431.412(c)(2)(vi). When submitting an application for renewal, the Evaluation Reports should be posted to the state's website with the application for public comment.

- a. The Interim Evaluation Report will discuss evaluation progress and present findings to date as per the approved evaluation design.

- b. For demonstration authority that expires prior to the overall demonstration’s expiration date, the Interim Evaluation Report must include an evaluation of the authority as approved by CMS.
- c. If the state is seeking to renew or extend the demonstration, the draft Interim Evaluation Report is due when the application for renewal is submitted. If the state made changes to the demonstration in its application for renewal, the research questions and hypotheses and a description of how the design was adapted should be included. If the state is not requesting a renewal for the demonstration, the Interim Evaluation Report is due one (1) year prior to the end of the demonstration. For demonstration phase outs prior to the expiration of the approval period, the draft Interim Evaluation Report is due to CMS on the date that will be specified in the notice of termination or suspension.
- d. The state must submit the final Interim Evaluation Report sixty (60) calendar days after receiving CMS comments on the draft Interim Evaluation Report and post the document to the state’s website.
- e. The Interim Evaluation Report must comply with Attachment B of these STCs.

49. Summative Evaluation Report. The draft Summative Evaluation Report must be developed in accordance with Attachment B (Preparing the Interim and Summative Evaluation Report) of these STCs. The state must submit the draft Summative Evaluation Report for the demonstration’s current approval period within eighteen (18) months of the end of the approval period represented by these STCs. The Summative Evaluation Report must include the information in the approved Evaluation Design.

- a. Unless otherwise agreed upon in writing by CMS, the state must submit the final Summative Evaluation Report within sixty (60) calendar days of receiving comments from CMS on the draft.
- b. The final Summative Evaluation Report must be posted to the state’s Medicaid website within thirty (30) calendar days of approval by CMS.

50. Corrective Action Plan Related to Evaluation. If evaluation findings indicate that demonstration features are not likely to assist in promoting the objectives of Medicaid, CMS reserves the right to require the state to submit a corrective action plan to CMS for approval. These discussions may also occur as part of a renewal process when associated with the state’s Interim Evaluation Report. This may be an interim step to withdrawing waivers or expenditure authorities, as outlined in STC 10.

51. State Presentations for CMS. CMS reserves the right to request that the state present and participate in a discussion with CMS on the Evaluation Design, the Interim Evaluation Report, and/or the Summative Evaluation Report.

52. Public Access. The state shall post the final documents (e.g., Monitoring Reports, Close Out Report, the approved Evaluation Design, Interim Evaluation Reports, and Summative Evaluation Reports) on the state’s website within thirty (30) calendar days of approval by CMS.

53. Additional Publications and Presentations. For a period of twelve (12) months following CMS approval of the final reports, CMS will be notified prior to presentation of these reports or their findings, including in related publications (including, for example, journal articles), by the state, contractor, or any other third party directly connected to the demonstration. Prior to release of these reports, articles or other publications, CMS will be provided a copy including any associated press materials. CMS will be given ten (10) business days to review and comment on publications before they are released. CMS may choose to decline to comment on or review some or all of these notifications and reviews. This requirement does not apply to the release or presentation of these materials to state or local government officials.

XII. GENERAL FINANCIAL REQUIREMENTS UNDER TITLE XIX

54. Allowable Expenditures. This demonstration project is approved for expenditures applicable to services rendered during the demonstration approval period designated by CMS. CMS will provide FFP for allowable demonstration expenditures only so long as they do not exceed the pre-defined limits as specified in these STCs.⁴

55. Unallowable Expenditures. In addition to the other unallowable costs and caveats already outlined in these STCs, the state may not receive FFP under any expenditure authority approved under this demonstration for any of the following:

- a. Room and board costs for residential treatment service providers unless they qualify as inpatient facilities under section 1905(a) of the Act.

56. Standard Medicaid Funding Process. The standard Medicaid funding process will be used for this demonstration. The state will provide quarterly expenditure reports through the Medicaid and CHIP Budget and Expenditure System (MBES/CBES) to report total expenditures for services provided under this demonstration following routine CMS-37 and CMS-64 reporting instructions as outlined in section 2500 of the State Medicaid Manual. The state will estimate matchable demonstration expenditures (total computable and federal share) subject to the budget neutrality expenditure limit and separately report these expenditures by quarter for each federal fiscal year on the form CMS-37 for both the medical assistance payments (MAP) and state and local administration costs (ADM). CMS shall make federal funds available based upon the state's estimate, as approved by CMS. Within thirty (30) days after the end of each quarter, the state shall submit form CMS-64 (Quarterly Medicaid Expenditure Report), showing Medicaid expenditures made in the quarter that just ended. If applicable, subject to the payment deferral process, CMS shall reconcile expenditures reported on form CMS-64 with federal funding previously made available to the state, and include the reconciling adjustment in the finalization of the grant award to the state.

57. Extent of Federal Financial Participation for the Demonstration. Subject to CMS approval of the source(s) of the non-federal share of funding, CMS will provide FFP at the

⁴ For a description of CMS's current policies related to budget neutrality for Medicaid demonstration projects authorized under section 1115(a) of the Act, see State Medicaid Director Letter #18-009.

applicable federal matching rate for the demonstration as a whole for the following, subject to the budget neutrality expenditure limits described in Section XII:

- a. Administrative costs, including those associated with the administration of the demonstration;
- b. Net expenditures and prior period adjustments of the Medicaid program that are paid in accordance with the approved Medicaid state plan; and
- c. Medical assistance expenditures and prior period adjustments made under section 1115 demonstration authority with dates of service during the demonstration extension period; including those made in conjunction with the demonstration, net of enrollment fees, cost sharing, pharmacy rebates, and all other types of third party liability.

58. Sources of Non-Federal Share. The state certifies that its match for the non-federal share of funds for this demonstration are state/local monies. The state further certifies that such funds must not be used to match for any other federal grant or contract, except as permitted by law. All sources of non-federal funding must be compliant with section 1903(w) of the Act and applicable regulations. In addition, all sources of the non-federal share of funding are subject to CMS approval.

- a. The state acknowledges that CMS has authority to review the sources of the non-federal share of funding for the demonstration at any time. The state agrees that all funding sources deemed unacceptable by CMS shall be addressed within the time frames set by CMS.
- b. The state acknowledges that any amendments that impact the financial status of the demonstration must require the state to provide information to CMS regarding all sources of the non-federal share of funding.

59. State Certification of Funding Conditions. The state must certify that the following conditions for non-federal share of demonstration expenditures are met:

- a. Units of government, including governmentally operated health care providers, may certify that state or local monies have been expended as the non-federal share of funds under the demonstration.
- b. To the extent the state utilizes certified public expenditures (CPE) as the funding mechanism for the state share of title XIX payments, including expenditures authorized under a section 1115 demonstration, CMS must approve a cost reimbursement methodology. This methodology must include a detailed explanation of the process by which the state would identify those costs eligible under title XIX (or under section 1115 authority) for purposes of certifying public expenditures.
- c. To the extent the state utilizes CPEs as the funding mechanism to claim federal match for expenditures under the demonstration, governmental entities to which general revenue funds are appropriated must certify to the state the amount of such state or local monies that are allowable under 42 CFR 433.51 to satisfy demonstration expenditures. If the CPE is claimed under a Medicaid authority, the federal matching funds received cannot then be used as the state share needed to receive other federal matching funds under 42 CFR 433.51(c). The entities that incurred the cost must also provide cost documentation to support the state's claim for federal match.

- d. The state may use intergovernmental transfers (IGT) to the extent that such funds are derived from state or local monies and are transferred by units of government within the state. Any transfers from governmentally operated health care providers must be made in an amount not to exceed the non-federal share of title XIX payments.
- e. Under all circumstances, health care providers must retain one hundred (100) percent of the reimbursement for claimed expenditures. Moreover, consistent with 42 CFR 447.10, no pre-arranged agreements (contractual, voluntary, or otherwise) may exist between health care providers and state and/or local government to return and/or redirect to the state any portion of the Medicaid payments. This confirmation of Medicaid payment retention is made with the understanding that payments that are the normal operating expenses of conducting business, such as payments related to taxes, including health care provider-related taxes, fees, business relationships with governments that are unrelated to Medicaid and in which there is no connection to Medicaid payments, are not considered returning and/or redirecting a Medicaid payment.

60. Program Integrity. The state must have processes in place to ensure there is no duplication of federal funding for any aspect of the demonstration. The state must also ensure that the state and any of its contractors follow standard program integrity principles and practices including retention of data. All data, financial reporting, and sources of non-federal share are subject to audit.

61. Medicaid Expenditure Groups (MEG). MEGs are defined for the purpose of identifying categories of Medicaid or demonstration expenditures subject to budget neutrality, components of budget neutrality expenditure limit calculations, and other purposes related to monitoring and tracking expenditures under the demonstration. The Master MEG Chart table provides a master list of MEGs defined for this demonstration.

Table 1: Master MEG Chart					
MEG	To Which BN Test Does This Apply?	WOW Per Capita	WOW Aggregate	WW	Brief Description
SUD-IMD	Hypo 1	X		X	Expenditures for otherwise covered Medicaid services furnished to otherwise eligible individuals who are primarily receiving treatment and withdrawal management services for substance use disorder (SUD) who are short-term residents in facilities that meet the definition of an institution for mental diseases (IMD).

CIS	Hypo 2	X		X	Expenditures for community integration services which consists of housing and employment supports to assist individuals transitioning back into the community from a residential treatment setting.
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62. Reporting Expenditures and Member Months. The state must report all demonstration expenditures claimed under the authority of title XIX of the Act and subject to budget neutrality each quarter on separate forms CMS-64.9 WAIVER and/or 64.9P WAIVER, identified by the demonstration project number assigned by CMS (11-W-0036/2). Separate reports must be submitted by MEG (identified by Waiver Name) and Demonstration Year (identified by the two-digit project number extension). Unless specified otherwise, expenditures must be reported by DY according to the dates of service associated with the expenditure. All MEGs identified in the Master MEG Chart as WW must be reported for expenditures, as further detailed in the MEG Detail for Expenditure and Member Month Reporting table below. To enable calculation of the budget neutrality expenditure limits, the state also must report member months of eligibility for specified MEGs.

- a. Cost Settlements. The state will report any cost settlements attributable to the demonstration on the appropriate prior period adjustment schedules (form CMS-64.9P WAIVER) for the summary sheet line 10b, in lieu of lines 9 or 10c. For any cost settlement not attributable to this demonstration, the adjustments should be reported as otherwise instructed in the State Medicaid Manual. Cost settlements must be reported by DY consistent with how the original expenditures were reported.
- b. Premiums and Cost Sharing Collected by the State. The state will report any premium contributions collected by the state from demonstration enrollees quarterly on the form CMS-64 Summary Sheet line 9D, columns A and B. In order to assure that these collections are properly credited to the demonstration, quarterly premium collections (both total computable and federal share) should also be reported separately by DY on form CMS-64 Narrative, and on the Total Adjustments tab in the Budget Neutrality Monitoring Tool. In the annual calculation of expenditures subject to the budget neutrality expenditure limit, premiums collected in the demonstration year will be offset against expenditures incurred in the demonstration year for determination of the state's compliance with the budget neutrality limits.
- c. Pharmacy Rebates. Because pharmacy rebates are not included in the base expenditures used to determine the budget neutrality expenditure limit, pharmacy rebates are not included for calculating net expenditures subject to budget neutrality. The state will report pharmacy rebates on form CMS-64.9 BASE, and not allocate them to any form 64.9 or 64.9P WAIVER.
- d. Administrative Costs. The state will separately track and report additional administrative costs that are directly attributable to the demonstration. All administrative costs must be identified on the forms CMS-64.10 WAIVER and/or 64.10P WAIVER. Unless indicated otherwise on the Master MEG Chart table, administrative costs are not counted in the budget neutrality tests; however, these costs are subject to monitoring by CMS.

- e. Member Months. As part of the Quarterly and Annual Monitoring Reports described in Section IX, the state must report the actual number of “eligible member months” for all demonstration enrollees for all MEGs identified as WOW Per Capita in the Master MEG Chart table above, and as also indicated in the MEG Detail for Expenditure and Member Month Reporting table below. The term “eligible member months” refers to the number of months in which persons enrolled in the demonstration are eligible to receive services. For example, a person who is eligible for three months contributes three eligible member months to the total. Two individuals who are eligible for two months, each contribute two eligible member months, for a total of four eligible member months. The state must submit a statement accompanying the annual report certifying the accuracy of this information.
- f. Budget Neutrality Specifications Manual. The state will create and maintain a Budget Neutrality Specifications Manual that describes in detail how the state will compile data on actual expenditures related to budget neutrality, including methods used to extract and compile data from the state’s Medicaid Management Information System, eligibility system, and accounting systems for reporting on the CMS-64, consistent with the terms of the demonstration. The Budget Neutrality Specifications Manual will also describe how the state compiles counts of Medicaid member months. The Budget Neutrality Specifications Manual must be made available to CMS on request.

Table 2: MEG Detail for Expenditure and Member Month Reporting

MEG (Waiver Name)	Detailed Description	Exclusions	CMS-64.9 Line(s) To Use	How Expend. Are Assigned to DY	MAP or ADM	Report Member Months (Y/N)	MEG Start Date	MEG End Date
SUD-IMD	See Expenditure Authority #1	See STC 55	Follow CMS-64.9 Base Category of Service Definition	Date of service	MAP	Y	4/8/2021	3/31/2026
CIS/RSS	See Expenditure Authority #2 See expenditure authority #2.	See STC 55	Follow CMS-64.9 Base Category of Service Definition	Date of service	MAP	Y	4/8/2021	3/31/2026

63. Demonstration Years. Demonstration Years (DY) for this demonstration are defined in the Demonstration Years table below.

Table 3: Demonstration Years		
Demonstration Year 1	April 8, 2021 to March 31, 2022	12 months
Demonstration Year 2	April 1 2022 to March 31, 2023	12 months
Demonstration Year 3	April 1, 2023 to March 31, 2024	12 months
Demonstration Year 4	April 1, 2024 to March 31, 2025	12 months
Demonstration Year 5	April 1, 2025 to March 31, 2026	12 months

64. Budget Neutrality Monitoring Tool. The state must provide CMS with quarterly budget neutrality status updates, including established baseline and member months data, using the Budget Neutrality Monitoring Tool provided through the Performance Metrics Database and Analytics (PMDA) system. The tool incorporates the “Schedule C Report” for comparing demonstration’s actual expenditures to the budget neutrality expenditure limits described in Section XIII. CMS will provide technical assistance, upon request.⁵

65. Claiming Period. The state will report all claims for expenditures subject to the budget neutrality agreement (including any cost settlements) within two years after the calendar quarter in which the state made the expenditures. All claims for services during the demonstration period (including any cost settlements) must be made within two years after the conclusion or termination of the demonstration. During the latter two-year period, the state will continue to identify separately net expenditures related to dates of service during the operation of the demonstration on the CMS-64 waiver forms in order to properly account for these expenditures in determining budget neutrality.

66. Future Adjustments to Budget Neutrality. CMS reserves the right to adjust the budget neutrality expenditure limit:

- a. To be consistent with enforcement of laws and policy statements, including regulations and letters, regarding impermissible provider payments, health care related taxes, or other payments, CMS reserves the right to make adjustments to the budget neutrality limit if any health care related tax that was in effect during the base year, or provider-related donation that occurred during the base year, is determined by CMS to be in violation of the provider donation and health care related tax provisions of section 1903(w) of the Act. Adjustments to annual budget targets will reflect the phase out of impermissible provider payments by law or regulation, where applicable.

⁵ 42 CFR §431.420(a)(2) provides that states must comply with the terms and conditions of the agreement between the Secretary (or designee) and the state to implement a demonstration project, and §431.420(b)(1) states that the terms and conditions will provide that the state will perform periodic reviews of the implementation of the demonstration. CMS’s current approach is to include language in STCs requiring, as a condition of demonstration approval, that states provide, as part of their periodic reviews, regular reports of the actual costs which are subject to the budget neutrality limit. CMS has obtained Office of Management and Budget (OMB) approval of the monitoring tool under the Paperwork Reduction Act (OMB Control No. 0938 – 1148) and in states agree to use the tool as a condition of demonstration approval.

- b. To the extent that a change in federal law, regulation, or policy requires either a reduction or an increase in FFP for expenditures made under this demonstration. In this circumstance, the state must adopt, subject to CMS approval, a modified budget neutrality agreement as necessary to comply with such change. The modified agreement will be effective upon the implementation of the change. The trend rates for the budget neutrality agreement are not subject to change under this STC. The state agrees that if mandated changes in the federal law require state legislation, the changes shall take effect on the day such state legislation becomes effective, or on the last day such legislation was required to be in effect under the federal law.
- c. The state certifies that the data it provided to establish the budget neutrality expenditure limit are accurate based on the state's accounting of recorded historical expenditures or the next best available data, that the data are allowable in accordance with applicable federal, state, and local statutes, regulations, and policies, and that the data are correct to the best of the state's knowledge and belief. The data supplied by the state to set the budget neutrality expenditure limit are subject to review and audit, and if found to be inaccurate, will result in a modified budget neutrality expenditure limit.

XIII. MONITORING BUDGET NEUTRALITY FOR THE DEMONSTRATION

67. Limit on Title XIX Funding. The state will be subject to limits on the amount of federal Medicaid funding the state may receive over the course of the demonstration approval. The budget neutrality expenditure limits are based on projections of the amount of FFP that the state would likely have received in the absence of the demonstration. The limit may consist of a Main Budget Neutrality Test, and one or more Hypothetical Budget Neutrality Tests, as described below. CMS's assessment of the state's compliance with these tests will be based on the Schedule C CMS-64 Waiver Expenditure Report, which summarizes the expenditures reported by the state on the CMS-64 that pertain to the demonstration.

68. Risk. The budget neutrality expenditure limits are determined on either a per capita or aggregate basis. If a per capita method is used, the state is at risk for the per capita cost of state plan and hypothetical populations, but not for the number of participants in the demonstration population. By providing FFP without regard to enrollment in the demonstration for all demonstration populations, CMS will not place the state at risk for changing economic conditions; however, by placing the state at risk for the per capita costs of the demonstration populations, CMS assures that the demonstration expenditures do not exceed the levels that would have been realized had there been no demonstration. If an aggregate method is used, the state accepts risk for both enrollment and per capita costs.

69. Calculation of the Budget Neutrality Limits and How They Are Applied. To calculate the budget neutrality limits for the demonstration, separate annual budget limits are determined for each DY on a total computable basis. Each annual budget limit is the sum of one or more components: per capita components, which are calculated as a projected without-waiver PMPM cost times the corresponding actual number of member months, and aggregate components, which project fixed total computable dollar expenditure amounts. The annual limits for all DYs are then added together to obtain a budget neutrality limit for

the entire demonstration period. The federal share of this limit will represent the maximum amount of FFP that the state may receive during the demonstration period for the types of demonstration expenditures described below. The federal share will be calculated by multiplying the total computable budget neutrality expenditure limit by the appropriate Composite Federal Share.

70. Main Budget Neutrality Test. This demonstration does not include a Main Budget Neutrality Test. Budget neutrality will consist entirely of Hypothetical Budget Neutrality Tests. Any excess spending under the Hypothetical Budget Neutrality Tests must be returned to CMS.

71. Hypothetical Budget Neutrality. When expenditure authority is provided for coverage of populations or services that the state could have otherwise provided through its Medicaid state plan or other title XIX authority (such as a waiver under section 1915 of the Act), CMS considers these expenditures to be “hypothetical;” that is, the expenditures would have been eligible to receive FFP elsewhere in the Medicaid program. For these hypothetical expenditures, CMS makes adjustments to the budget neutrality test which effectively treats these expenditures as if they were for approved Medicaid state plan services. Hypothetical expenditures, therefore, do not necessitate savings to offset the otherwise allowable services. This approach reflects CMS’s current view that states should not have to “pay for,” with demonstration savings, costs that could have been otherwise eligible for FFP under a Medicaid state plan or other title XIX authority; however, when evaluating budget neutrality, CMS does not offset non-hypothetical expenditures with projected or accrued savings from hypothetical expenditures. That is, savings are not generated from a hypothetical population or service. To allow for hypothetical expenditures, while preventing them from resulting in savings, CMS currently applies a separate, independent Hypothetical Budget Neutrality Tests, which subject hypothetical expenditures to pre-determined limits to which the state and CMS agree, and that CMS approves, as a part of this demonstration approval. If the state’s WW hypothetical spending exceeds the supplemental test’s expenditure limit, the state agrees (as a condition of CMS approval) to refund the FFP to CMS.

72. Hypothetical Budget Neutrality Test 1: The table below identifies the MEGs that are used for Hypothetical Budget Neutrality Test 1. MEGs that are designated “WOW Only” or “Both” are the components used to calculate the budget neutrality expenditure limit. The Composite Federal Share for the Hypothetical Budget Neutrality Test is calculated based on all MEGs indicated as “WW Only” or “Both.” MEGs that are indicated as “WW Only” or “Both” are counted as expenditures against this budget neutrality expenditure limit. Any expenditures in excess of the limit from Hypothetical Budget Neutrality Test are counted as WW expenditures under the Main Budget Neutrality Test.

Table 4: Hypothetical Budget Neutrality Test

MEG	PC or Agg*	WOW Only, WW Only, or Both	TREND	DY 1	DY 2		DY 4	DY 5
SUD-IMD	PC	Both	4.5%	\$1864	\$1948	\$2036	\$2127	\$2223
CIS	PC	Both	4.5%	\$0	\$193	\$201	\$211	\$220

73. Composite Federal Share. The Composite Federal Share is the ratio that will be used to convert the total computable budget neutrality limit to federal share. The Composite Federal Share is the ratio calculated by dividing the sum total of FFP received by the state on actual demonstration expenditures during the approval period by total computable demonstration expenditures for the same period, as reported through MBES/CBES and summarized on Schedule C. Since the actual final Composite Federal Share will not be known until the end of the demonstration’s approval period, for the purpose of interim monitoring of budget neutrality, a reasonable estimate of Composite Federal Share may be developed and used through the same process or through an alternative mutually agreed to method. Each Hypothetical Budget Neutrality Test has its own Composite Federal Share, as defined in the paragraph pertaining to each particular test.

74. Exceeding Budget Neutrality. CMS will enforce the budget neutrality agreement over the life of the demonstration approval period, which extends from April 8, 2021 until March 31, 2026. If at the end of the demonstration approval period the budget neutrality limit has been exceeded, the excess federal funds will be returned to CMS. If the demonstration is terminated prior to the end of the demonstration period, the budget neutrality test will be based on the time period through the termination date.

75. Course Correction. If at any time during the demonstration approval period CMS determines that the demonstration is on course to exceed its budget neutrality expenditure limit, CMS will require the state to submit a corrective action plan for CMS review and approval. CMS will use the threshold levels in the tables below as a guide for determining when corrective action is required.

Table 5: Hypothetical Budget Neutrality Test Mid-Course Correction Calculations

Demonstration Year	Cumulative Target Definition	Percentage
DY 1	Cumulative budget neutrality limit plus:	2.0 percent
DY 1 through DY 2	Cumulative budget neutrality limit plus:	1.5 percent
DY 1 through DY 3	Cumulative budget neutrality limit plus:	1.0 percent
DY 1 through DY 4	Cumulative budget neutrality limit plus:	0.5 percent
DY 1 through DY 5	Cumulative budget neutrality limit plus:	0.0 percent

XIV. SCHEDULE OF DELIVERABLES FOR THE DEMONSTRATION PERIOD

Table 6: Schedule of Deliverables for the Demonstration Period		
Date	Deliverable	STC
30 calendar days after approval date	State acceptance of demonstration Waivers, STCs, and Expenditure Authorities	Approval letter
90 calendar days after approval date	SUD Implementation Plan	STC 19
60 calendar days after receipt of CMS comments	Revised SUD Implementation Plan and SUD Health IT Plan	STC 19
150 calendar days after Implementation Plan Completeness	SUD Monitoring Protocol	STC 20
60 calendar days after receipt of CMS comments	Revised SUD Monitoring Protocol	STC 20
180 calendar days after approval date	Draft Evaluation Design	STC 44
60 days after receipt of CMS comments	Revised Draft Evaluation Design	STC 46
No later than 60 calendar days after May 30, 2023	SUD Mid-Point Assessment	STC 37
March 31, 2024, or with renewal application	Draft Interim Evaluation Report	STC 48
60 calendar days after receipt of CMS comments	Final Interim Evaluation Report	STC 48
Within 18 months after March 31, 2025	Draft Summative Evaluation Report	STC 49
60 calendar days after receipt of CMS comments	Final Summative Evaluation Report	STC 49
Monthly Deliverables	Monitoring Calls	STC 40
Quarterly monitoring reports due 60 calendar days after end of each quarter, except 4 th quarter.	Quarterly Monitoring Reports, including implementation updates	STC 36
	Quarterly Expenditure Reports	STC 36
Annual Deliverables - Due 90 calendar days after end of each 4 th quarter	Annual Reports	STC 36

ATTACHMENT A DEVELOPING THE EVALUATION DESIGN

Introduction

For states that are testing new approaches and flexibilities in their Medicaid programs through section 1115 demonstrations, evaluations are crucial to understand and disseminate what is or is not working and why. The evaluations of new initiatives seek to produce new knowledge and direction for programs and inform both Congress and CMS about Medicaid policy for the future. While a narrative about what happened during a demonstration provides important information, the principal focus of the evaluation of a section 1115 demonstration should be obtaining and analyzing data on the process (e.g., whether the demonstration is being implemented as intended), outcomes (e.g., whether the demonstration is having the intended effects on the target population), and impacts of the demonstration (e.g., whether the outcomes observed in the targeted population differ from outcomes in similar populations not affected by the demonstration). Both state and federal governments could benefit from improved quantitative and qualitative evidence to inform policy decisions.

Expectations for Evaluation Designs

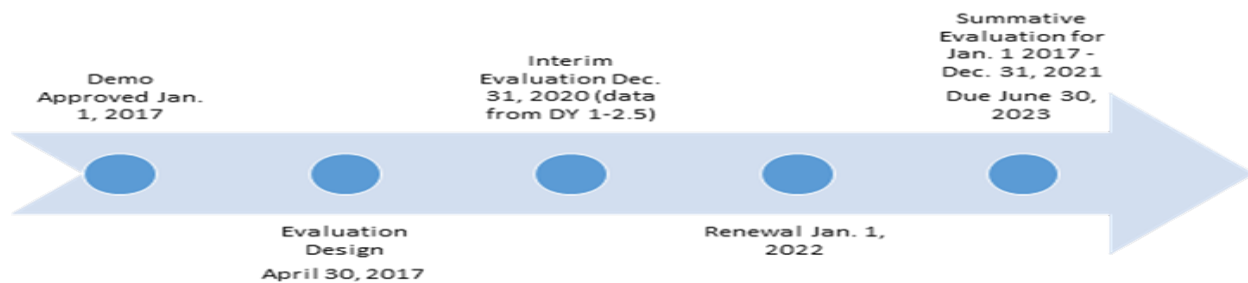
All states with Medicaid section 1115 demonstrations are required to conduct an evaluation, and the Evaluation Design is the roadmap for conducting the evaluation. The roadmap begins with the stated goals for the demonstration followed by the measurable evaluation questions and quantifiable hypotheses, all to support a determination of the extent to which the demonstration has achieved its goals.

The format for the Evaluation Design is as follows:

General Background Information;
Evaluation Questions and Hypotheses;
Methodology;
Methodological Limitations;
Attachments.

Submission Timelines

There is a specified timeline for the state's submission of Evaluation Design and Reports. (The graphic below depicts an example of this timeline). In addition, the state should be aware that section 1115 evaluation documents are public records. The state is required to publish the Evaluation Design to the state's website within thirty (30) days of CMS approval, as per 42 CFR 431.424(e). CMS will also publish a copy to the Medicaid.gov website.



Required Core Components of All Evaluation Designs

The Evaluation Design sets the stage for the Interim and Summative Evaluation Reports. It is important that the Evaluation Design explain the goals and objectives of the demonstration, the hypotheses related to the demonstration, and the methodology (and limitations) for the evaluation. A copy of the state’s Driver Diagram (described in more detail in paragraph B2 below) should be included with an explanation of the depicted information.

A. General Background Information – In this section, the state should include basic information about the demonstration, such as:

- 1) The issue/s that the state is trying to address with its section 1115 demonstration and/or expenditure authorities, the potential magnitude of the issue/s, and why the state selected this course of action to address the issue/s (e.g., a narrative on why the state submitted an 1115 demonstration proposal).
- 2) The name of the demonstration, approval date of the demonstration, and period of time covered by the evaluation;
- 3) A brief description of the demonstration and history of the implementation, and whether the draft Evaluation Design applies to an amendment, extension, renewal, or expansion of, the demonstration;
- 4) For renewals, amendments, and major operational changes: A description of any changes to the demonstration during the approval period; the primary reason or reasons for the change; and how the Evaluation Design was altered or augmented to address these changes.
- 5) Describe the population groups impacted by the demonstration.

B. Evaluation Questions and Hypotheses – In this section, the state should:

- 1) Describe how the state’s demonstration goals are translated into quantifiable targets for improvement, so that the performance of the demonstration in achieving these targets could be measured.

- 2) Include a Driver Diagram to visually aid readers in understanding the rationale behind the cause and effect of the variants behind the demonstration features and intended outcomes. A driver diagram is a particularly effective modeling tool when working to improve health and health care through specific interventions. The diagram includes information about the goal of the demonstration, and the features of the demonstration. A driver diagram depicts the relationship between the aim, the primary drivers that contribute directly to achieving the aim, and the secondary drivers that are necessary to achieve the primary drivers for the demonstration. For an example and more information on driver diagrams: <https://innovation.cms.gov/files/x/hciatwoaimsdrvrs.pdf>
- 3) Identify the state’s hypotheses about the outcomes of the demonstration:
- 4) Discuss how the evaluation questions align with the hypotheses and the goals of the demonstration;
- 5) Address how the research questions / hypotheses of this demonstration promote the objectives of Titles XIX and/or XXI.

C. Methodology – In this section, the state is to describe in detail the proposed research methodology.

The focus is on showing that the evaluation meets the prevailing standards of scientific and academic rigor, and the results are statistically valid and reliable, and that where appropriate it builds upon other published research (use references).

This section provides the evidence that the demonstration evaluation will use the best available data; reports on, controls for, and makes appropriate adjustments for the limitations of the data and their effects on results; and discusses the generalizability of results. This section should provide enough transparency to explain what will be measured and how. Specifically, this section establishes:

- 1) *Evaluation Design* – Provide information on how the evaluation will be designed. For example, will the evaluation utilize a pre/post comparison? A post-only assessment? Will a comparison group be included?
- 2) *Target and Comparison Populations* – Describe the characteristics of the target and comparison populations, to include the inclusion and exclusion criteria. Include information about the level of analysis (beneficiary, provider, or program level), and if populations will be stratified into subgroups. Additionally discuss the sampling methodology for the populations, as well as support that a statistically reliable sample size is available.
- 3) *Evaluation Period* – Describe the time periods for which data will be included.

- 4) *Evaluation Measures* – List all measures that will be calculated to evaluate the demonstration. Include the measure stewards (i.e., the organization(s) responsible for the evaluation data elements/sets by “owning”, defining, validating; securing; and submitting for endorsement, etc.) Include numerator and denominator information. Additional items to ensure:
- a. The measures contain assessments of both process and outcomes to evaluate the effects of the demonstration during the period of approval.
 - b. Qualitative analysis methods may be used, and must be described in detail.
 - c. Benchmarking and comparisons to national and state standards, should be used, where appropriate.
 - d. Proposed health measures could include CMS’s Core Set of Health Care Quality Measures for Children in Medicaid and CHIP, Consumer Assessment of Health Care Providers and Systems (CAHPS), the Initial Core Set of Health Care Quality Measures for Medicaid-Eligible Adults and/or measures endorsed by National Quality Forum (NQF).
 - e. Proposed performance metrics can be selected from nationally recognized metrics, for example from sets developed by the Center for Medicare and Medicaid Innovation or for meaningful use under Health Information Technology (HIT).
 - f. Among considerations in selecting the metrics shall be opportunities identified by the state for improving quality of care and health outcomes, and controlling cost of care.
- 5) *Data Sources* – Explain where the data will be obtained, and efforts to validate and clean the data. Discuss the quality and limitations of the data sources.

If primary data (data collected specifically for the evaluation) – The methods by which the data will be collected, the source of the proposed question/responses, the frequency and timing of data collection, and the method of data collection. (Copies of any proposed surveys must be reviewed with CMS for approval before implementation).

- 6) *Analytic Methods* – This section includes the details of the selected quantitative and/or qualitative measures to adequately assess the effectiveness of the demonstration. This section should:
- a. Identify the specific statistical testing which will be undertaken for each measure (e.g., t-tests, chi-square, odds ratio, ANOVA, regression). Table A is an example of how the state might want to articulate the analytic methods for each research question and measure.

- b. Explain how the state will isolate the effects of the demonstration (from other initiatives occurring in the state at the same time) through the use of comparison groups.
 - c. A discussion of how propensity score matching and difference in differences design may be used to adjust for differences in comparison populations over time (if applicable).
 - d. The application of sensitivity analyses, as appropriate, should be considered.
- 7) *Other Additions* – The state may provide any other information pertinent to the Evaluation Design of the demonstration.

Table A. Example Design Table for the Evaluation of the Demonstration

Research Question	Outcome measures used to address the research question	Sample or population subgroups to be compared	Data Sources	Analytic Methods
Hypothesis 1				
Research question 1a	-Measure 1 -Measure 2 -Measure 3	-Sample e.g. All attributed Medicaid beneficiaries -Beneficiaries with diabetes diagnosis	-Medicaid fee-for-service and encounter claims records	-Interrupted time series
Research question 1b	-Measure 1 -Measure 2 -Measure 3 -Measure 4	-sample, e.g., PPS patients who meet survey selection requirements (used services within the last 6 months)	-Patient survey	Descriptive statistics
Hypothesis 2				
Research question 2a	-Measure 1 -Measure 2	-Sample, e.g., PPS administrators	-Key informants	Qualitative analysis of interview material

D. Methodological Limitations – This section provides detailed information on the limitations of the evaluation. This could include the design, the data sources or collection process, or analytic methods. The state should also identify any efforts to minimize the limitations. Additionally, this section should include any information about features of the demonstration that effectively present methodological constraints that the state would like CMS to take into consideration in its review. For example:

- 1) When the state demonstration is:
 - a. Long-standing, non-complex, unchanged, or
 - b. Has previously been rigorously evaluated and found to be successful, or
 - c. Could now be considered standard Medicaid policy (CMS published regulations or guidance)
- 2) When the demonstration is also considered successful without issues or concerns that

would require more regular reporting, such as:

- a. Operating smoothly without administrative changes; and
- b. No or minimal appeals and grievances; and
- c. No state issues with CMS-64 reporting or budget neutrality; and
- d. No Corrective Action Plans (CAP) for the demonstration.

E. Attachments

- 1) **Independent Evaluator.** This includes a discussion of the state’s process for obtaining an independent entity to conduct the evaluation, including a description of the qualifications that the selected entity must possess, and how the state will assure no conflict of interest. Explain how the state will assure that the Independent Evaluator will conduct a fair and impartial evaluation, prepare an objective Evaluation Report, and that there would be no conflict of interest. The evaluation design should include “No Conflict of Interest” signed by the independent evaluator.
- 2) **Evaluation Budget.** A budget for implementing the evaluation shall be provided with the draft Evaluation Design. It will include the total estimated cost, as well as a breakdown of estimated staff, administrative, and other costs for all aspects of the evaluation. Examples include, but are not limited to: the development of all survey and measurement instruments; quantitative and qualitative data collection; data cleaning and analyses; and reports generation. A justification of the costs may be required by CMS if the estimates provided do not appear to sufficiently cover the costs of the draft Evaluation Design or if CMS finds that the draft Evaluation Design is not sufficiently developed.
- 3) **Timeline and Major Milestones.** Describe the timeline for conducting the various evaluation activities, including dates for evaluation-related milestones, including those related to procurement of an outside contractor, if applicable, and deliverables. The Final Evaluation Design shall incorporate an Interim and Summative Evaluation. Pursuant to 42 CFR 431.424(c)(v), this timeline should also include the date by which the Final Summative Evaluation report is due.

ATTACHMENT B

Preparing the Interim and Summative Evaluation Reports

Introduction

For states that are testing new approaches and flexibilities in their Medicaid programs through section 1115 demonstrations, evaluations are crucial to understand and disseminate what is or is not working and why. The evaluations of new initiatives seek to produce new knowledge and direction for programs and inform Medicaid policy for the future. While a narrative about what happened during a demonstration provide important information, the principal focus of the evaluation of a section 1115 demonstration should be obtaining and analyzing data on the process (e.g., whether the demonstration is being implemented as intended), outcomes (e.g., whether the demonstration is having the intended effects on the target population), and impacts of the demonstration (e.g., whether the outcomes observed in the targeted population differ from outcomes in similar populations not affected by the demonstration). Both state and federal governments could benefit from improved quantitative and qualitative evidence to inform policy decisions.

Expectations for Evaluation Reports

Medicaid section 1115 demonstrations are required to conduct an evaluation that is valid (the extent to which the evaluation measures what it is intended to measure), and reliable (the extent to which the evaluation could produce the same results when used repeatedly). To this end, the already approved Evaluation Design is a map that begins with the demonstration goals, then transitions to the evaluation questions, and to the specific hypotheses, which will be used to investigate whether the demonstration has achieved its goals. States should have a well-structured analysis plan for their evaluation. As these valid analyses multiply (by a single state or by multiple states with similar demonstrations) and the data sources improve, the reliability of evaluation findings will be able to shape Medicaid policy in order to improve the health and welfare of Medicaid beneficiaries for decades to come. When submitting an application for renewal, the interim evaluation report should be posted on the state's website with the application for public comment. Additionally, the interim evaluation report must be included in its entirety with the application submitted to CMS.

Intent of this Guidance

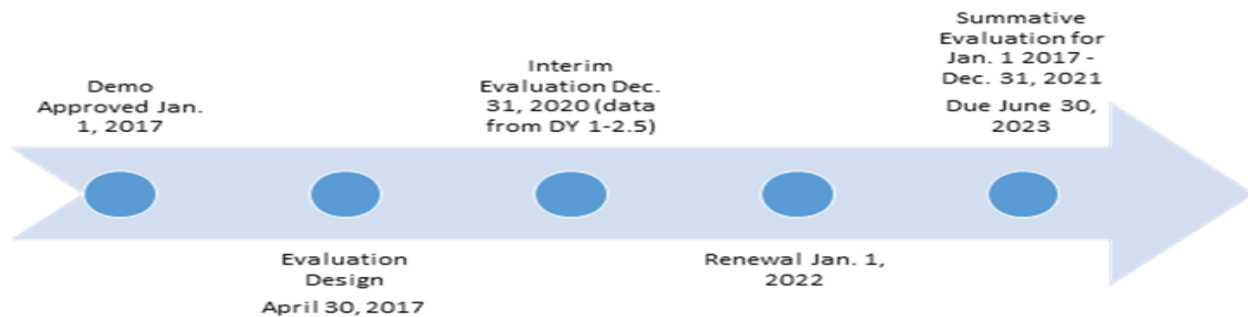
The Social Security Act (the Act) requires an evaluation of every section 1115 demonstration. In order to fulfill this requirement, the state's submission must provide a comprehensive written presentation of all key components of the demonstration, and include all required elements specified in the approved Evaluation Design. This Guidance is intended to assist states with organizing the required information in a standardized format and understanding the criteria that CMS will use in reviewing the submitted Interim and Summative Evaluation Reports.

The format for the Interim and Summative Evaluation reports is as follows:

- A. Executive Summary;
- B. General Background Information;
- C. Evaluation Questions and Hypotheses;
- D. Methodology;
- E. Methodological Limitations;
- F. Results;
- G. Conclusions;
- H. Interpretations, and Policy Implications and Interactions with Other State Initiatives;
- I. Lessons Learned and Recommendations; and
- J. Attachment(s).

Submission Timelines

There is a specified timeline for the state’s submission of Evaluation Designs and Evaluation Reports. These dates are specified in the demonstration Special Terms and Conditions (STCs). (The graphic below depicts an example of this timeline). In addition, the state should be aware that section 1115 evaluation documents are public records. In order to assure the dissemination of the evaluation findings, lessons learned, and recommendations, the state is required to publish to the state’s website the evaluation design within thirty (30) days of CMS approval, and publish reports within thirty (30) days of submission to CMS , pursuant to 42 CFR 431.424. CMS will also publish a copy to Medicaid.gov.



Required Core Components of Interim and Summative Evaluation Reports

The section 1115 Evaluation Report presents the research about the section 1115 Demonstration. It is important that the report incorporate a discussion about the structure of the Evaluation Design to explain the goals and objectives of the demonstration, the hypotheses related to the demonstration, and the methodology for the evaluation. A copy of the state's Driver Diagram (described in the Evaluation Design guidance) must be included with an explanation of the depicted information. The Evaluation Report should present the relevant data and an interpretation of the findings; assess the outcomes (what worked and what did not work); explain the limitations of the design, data, and analyses; offer recommendations regarding what (in hindsight) the state would further advance, or do differently, and why; and discuss the implications on future Medicaid policy. Therefore, the state's submission must include:

- A. Executive Summary** – A summary of the demonstration, the principal results, interpretations, and recommendations of the evaluation.
- B. General Background Information about the Demonstration** – In this section, the state should include basic information about the demonstration, such as:
 - 1) The issues that the state is trying to address with its section 1115 demonstration and/or expenditure authorities, how the state became aware of the issue, the potential magnitude of the issue, and why the state selected this course of action to address the issues.
 - 2) The name of the demonstration, approval date of the demonstration, and period of time covered by the evaluation;
 - 3) A brief description of the demonstration and history of the implementation, and if the evaluation is for an amendment, extension, renewal, or expansion of, the demonstration;
 - 4) For renewals, amendments, and major operational changes: A description of any changes to the demonstration during the approval period; whether the motivation for change was due to political, economic, and fiscal factors at the state and/or federal level; whether the programmatic changes were implemented to improve beneficiary health, provider/health plan performance, or administrative efficiency; and how the Evaluation Design was altered or augmented to address these changes.
 - 5) Describe the population groups impacted by the demonstration.
- C. Evaluation Questions and Hypotheses** – In this section, the state should:
 - 1) Describe how the state's demonstration goals were translated into quantifiable targets for improvement, so that the performance of the demonstration in achieving these targets could be measured. The inclusion of a Driver Diagram in the Evaluation Report is highly encouraged, as the visual can aid readers in understanding the rationale behind the demonstration features and intended outcomes.

- 2) Identify the state’s hypotheses about the outcomes of the demonstration;
 - a. Discuss how the goals of the demonstration align with the evaluation questions and hypotheses;
 - b. Explain how this Evaluation Report builds upon and expands earlier demonstration evaluation findings (if applicable); and
 - c. Address how the research questions / hypotheses of this demonstration promote the objectives of Titles XIX and XXI.

D. Methodology – In this section, the state is to provide an overview of the research that was conducted to evaluate the section 1115 demonstration consistent with the approved Evaluation Design.

The evaluation design should also be included as an attachment to the report. The focus is on showing that the evaluation builds upon other published research (use references), and meets the prevailing standards of scientific and academic rigor, and the results are statistically valid and reliable.

An interim report should provide any available data to date, including both quantitative and qualitative assessments. The Evaluation Design should assure there is appropriate data development and collection in a timely manner to support developing an interim evaluation.

This section provides the evidence that the demonstration evaluation used the best available data and describes why potential alternative data sources were not used; reported on, controlled for, and made appropriate adjustments for the limitations of the data and their effects on results; and discusses the generalizability of results. This section should provide enough transparency to explain what was measured and how. Specifically, this section establishes that the approved Evaluation Design was followed by describing:

1. *Evaluation Design* – Will the evaluation be an assessment of: pre/post, post-only, with or without comparison groups, etc.?
2. *Target and Comparison Populations* – Describe the target and comparison populations; include inclusion and exclusion criteria.
3. *Evaluation Period* – Describe the time periods for which data will be collected
4. *Evaluation Measures* – What measures are used to evaluate the demonstration, and who are the measure stewards?
5. *Data Sources* – Explain where the data will be obtained, and efforts to validate and clean the data.
6. *Analytic methods* – Identify specific statistical testing which will be undertaken for each measure (t-tests, chi-square, odds ratio, ANOVA, regression, etc.).
7. *Other Additions* – The state may provide any other information pertinent to the evaluation of the demonstration.

A. Methodological Limitations - This section provides sufficient information for discerning the strengths and weaknesses of the study design, data sources/collection, and analyses.

B. Results – In this section, the state presents and uses the quantitative and qualitative data to show to whether and to what degree the evaluation questions and hypotheses of the demonstration were achieved. The findings should visually depict the demonstration results (tables, charts, graphs). This section should include information on the statistical tests conducted.

C. Conclusions – In this section, the state will present the conclusions about the evaluation results.

- 1) In general, did the results show that the demonstration was/was not effective in achieving the goals and objectives established at the beginning of the demonstration?
- 2) Based on the findings, discuss the outcomes and impacts of the demonstration and identify the opportunities for improvements. Specifically:
 - a. If the state did not fully achieve its intended goals, why not? What could be done in the future that would better enable such an effort to more fully achieve those purposes, aims, objectives, and goals?

D. Interpretations, Policy Implications and Interactions with Other State Initiatives – In this section, the state will discuss the section 1115 demonstration within an overall Medicaid context and long range planning. This should include interrelations of the demonstration with other aspects of the state’s Medicaid program, interactions with other Medicaid demonstrations, and other federal awards affecting service delivery, health outcomes and the cost of care under Medicaid. This section provides the state with an opportunity to provide interpretation of the data using evaluative reasoning to make judgments about the demonstration. This section should also include a discussion of the implications of the findings at both the state and national levels.

E. Lessons Learned and Recommendations – This section of the Evaluation Report involves the transfer of knowledge. Specifically, the “opportunities” for future or revised demonstrations to inform Medicaid policymakers, advocates, and stakeholders is just as significant as identifying current successful strategies. Based on the evaluation results:

1. What lessons were learned as a result of the demonstration?
2. What would you recommend to other states which may be interested in implementing a similar approach?

F. Attachment - Evaluation Design: Provide the CMS-approved Evaluation Design

Section 1115 Waiver Implementation Plan

**Oregon Health Plan
Substance Use Disorder
Demonstration**

Medicaid and Children's Health Insurance Program

Submitted: May 29, 2020



Oregon
Health
Authority



TABLE OF CONTENTS	ERROR! BOOKMARK NOT DEFINED.
INTRODUCTION	46
SECTION 1- MILESTONE CRITERIA	47
1. Access to Critical Levels of Care for OUD and other SUDs	47
2. Use of Evidence-based, SUD specific Patient Placement Criteria	55
3. Use of Nationally recognized SUD-specific Program Standards to Set Provider Qualifications for Residential Treatment Facilities	57
4. Sufficient Provider Capacity at Critical Levels of Care including for Medication Assisted Treatment of OUD	59
5. Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and OUD	62
6. Improved Care Coordination and Transitions between Levels of Care	66
SECTION II- IMPLEMENTATION ADMINISTRATION	68
SECTION III- RELEVANT DOCUMENTS	69
Attachment A- Milestone 5a- SUD Health Information Technology (IT) Plan	69

INTRODUCTION

Oregon is among many states facing a public health crisis relating to substance use disorders (SUD). Of individuals accessing SUD treatment in Oregon, 33.5% (2017) had a primary diagnosis of opioid use disorder (OUD); this rate more than doubled over a four-year period from 2013 to 2017⁶. Oregon's opioid-related overdose deaths have increased during the past decade from 73 total deaths during 2000 to its high at 336 in 2011. In 2017 there were 6.8 deaths per 100,000 Oregon residents (276 total deaths)². All deaths related to all drugs in Oregon have remained high, increasing slightly from 13.760 deaths per 100,000 population in 2009 (529) to 14.18 deaths in 2017 (578)⁷. The need is clear for continued system improvement across all substances of use.

In order to improve health outcomes and reduce deaths related to substance use disorders, Oregon must improve access to substance use disorder (SUD) treatment, increase provider capacity, and implement effective standards of care. Oregon proposes to transform the SUD delivery system through evidence-based practices, tribal-based practices, and comprehensive care. Through the SUD waiver, Oregon will bolster existing programs and initiatives and implement new strategies to build comprehensive, continuum of care services and supports.

Specifically, Oregon has requested the waiver authority to:

- a) Claim Federal reimbursement for services provided in an Institution for Mental Disease (IMD) with more than 16 beds, for the duration of time clinically deemed necessary.
- b) Expand the full SUD continuum of care to include prevention, early intervention, and crisis intervention .

¹ "SUD MMIS Treatment Data." *Oregon Health Authority*, November 28, 2018. Internal Data review

² "Prescribing and Overdose Data for Oregon." *Oregon Department of Education: 2018 Social Sciences Standards SBE First Reading Draft: Social Sciences: State of Oregon*, 2018, www.oregon.gov/oha/ph/preventionwellness/substanceuse/opioids/pages/data.aspx.

- c) Develop housing support services that will provide transition assistance and skill building for individuals with SUD.

This implementation plan provides details on OHA’s strategic approach and how this project addresses CMS’s goals and required milestones to ensure the full continuum of care succeeds in improving quality, accessibility, and outcomes for SUD/ODD treatment in the most cost-effective manner over the course of the five-year waiver period from April 8, 2021 to March 31, 2026.

SECTION 1- MILESTONE CRITERIA

1. ACCESS TO CRITICAL LEVELS OF CARE FOR OUD AND OTHER SUDS

Milestone 1 Criteria	Current State	Future State	Summary of Actions Needed
Criteria for completion of milestone	Provide an overview of current SUD treatment services covered by the state in each level of care. For services currently covered in the state plan, list the benefit category and page location; for services currently covered in a demonstration, include the program name and Special Term and Condition number.	Provide an overview of planned SUD treatment services to be covered by the state in each level of care: indicate whether planned services will be added to the state plan or authorized through the 1115.	Provide a list of action items needed to be completed to meet milestone requirements, if any. Include persons or entities responsible for completion of each action item. Include timeframe for completion of each action item.
Coverage of outpatient services	Outpatient services are currently covered under Oregon’s Medicaid State Plan. (ASAM 1.0) State Plan:	OHA has robust monitoring and evaluation services Capacity of the Peer Delivered Services workforce has	Develop robust quarterly report for internal quality improvement strategies for SUD services (All levels) (0-6 months); Addiction Treatment, Recovery & Prevention Services; Medicaid; and

Milestone 1 Criteria	Current State	Future State	Summary of Actions Needed
	<p>SUD services- Attachment 3.1-A, section 13.d- Rehabilitation, page 6-d.10 thru 6-d.19</p> <p>Adult benefit Plan- TN 17-0003 form ABP 5 coverages outpatient hospital SUD services, Physician services. TCM- Targeted group: <u>Substance Abusing Pregnant Women and Substance Abusing Parents with Children under Age 18.</u></p> <p>Supplement 1 to Attachment 3.1-A, pages 19-22.a</p> <p>Additional services covered under State Plan:</p> <p>Individual/Group counseling therapy/Individual family and/or couple counseling: Attachment 3.1-A, section 13.d-SUD rehab, page 6.d.11</p> <p>Acupuncture: Attachment 3.1-A, section 13.d-SUD rehab, page 6.d.13.</p> <p>Adult benefit Plan- TN 17-0003 form ABP 5</p> <p>Peer Delivered Services (PDS) are a covered available</p>	<p>been increased (State Plan).</p> <p>OHP SUD system benefits provide full continuum of care to include prevention, early intervention, and crisis intervention services (State Plan)</p> <p>Each year we will improve rates of identification, initiation, and engagement</p> <p>Provider capacity has expanded to adequate level for these services</p> <p>Develop provider review process around staffing levels</p> <p>Each provider will have been reviewed and confirmed has adequate staffing for this level of care</p> <p>The number and diversity of culturally specific peers within the workforce has been expanded</p>	<p>Health Policy & Analytics within OHA.</p> <p>Set scope of work for the workforce regarding prevention, early intervention, and crisis intervention services and establish reimbursement rate. (12-24months);</p> <p>Addiction Treatment Recovery & Prevention unit with Health Systems Division</p> <p>Set standards for identification, initiation, and engagement.</p> <p>Educate and engage providers around these standards and implementation. (12-24 months);</p> <p>Health Systems Division</p> <p>Develop requirement for CCOs to have a mechanism to ensure that they have adequate capacity to serve those in their region around SUD services (12-24 months);</p> <p>Health Systems Division</p> <p>Develop standard range of client to clinician ratio (12-24 months);</p> <p>Addiction Treatment Recovery & Prevention unit with Health Systems Division</p> <p>Develop provider review process around staffing levels; (12-24 months);</p> <p>Addiction Treatment Recovery & Prevention unit with Health Systems Division</p>

Milestone 1 Criteria	Current State	Future State	Summary of Actions Needed
	benefit. (All levels of treatment)		<p>Develop more culturally relevant training for PDS workers, including a tribal- specific course and Latino- specific course (12-24 months); Office of Equity & Inclusion & Behavioral Health</p> <p>Expand the number and diversity of culturally specific peers within the workforce (12-24 months); Health Systems division & Office of Equity and Inclusion</p>
Coverage of intensive outpatient services	<p>Intensive outpatient services are currently covered under Oregon’s Medicaid State Plan. (ASAM 2.1; 2.5)</p> <p>State Plan: SUD services- Attachment 3.1-A, section 13.d- Rehabilitation, page 6-d.10 thru 6-d.19</p> <p>Adult benefit Plan- TN 17-0003 form ABP 5 coverages outpatient hospital SUD services, Physician services. TCM- Targeted group: <u>Substance Abusing Pregnant Women and Substance Abusing Parents with Children under Age 18.</u></p>	<p>OHA has robust monitoring and evaluation services</p> <p>Capacity of the Peer Delivered Services workforce has been increased (State Plan).</p> <p>OHP SUD system benefits provide full continuum of care to include prevention, early intervention, and crisis intervention services (State Plan)</p> <p>Each year we will improve rates of identification, initiation, and engagement</p> <p>Provider capacity has expanded to adequate level for these services</p>	<p>Develop robust quarterly report for internal quality improvement strategies for SUD services (All levels) (0-6 months); Addiction Treatment, Recovery & Prevention Services; Medicaid; and Health Policy & Analytics within OHA.</p> <p>Set scope of work for the workforce regarding prevention, early intervention, and crisis intervention services and establish reimbursement rate. (12-24 months); Health Systems Division</p> <p>Set standards for identification, initiation, and engagement.</p> <p>Educate and engage providers around these standards and implementation. (12-24 months); Health Systems Division</p>

Milestone 1 Criteria	Current State	Future State	Summary of Actions Needed
	<p>Supplement 1 to Attachment 3.1-A, pages 19-22.a Peer Delivered Services are a covered available benefit. (All levels of treatment) Oregon and The Nine Federally Recognized Tribes of Oregon and the Urban Indian Program developed Tribal- Specific Curriculum for the Family Support Peers including some SUD work</p>	<p>Develop provider review process around staffing levels Each provider will have been reviewed and confirmed has adequate staffing for this level of care The number and diversity of culturally specific peers within the workforce has been expanded</p>	<p>Require CCOs to have a mechanism to ensure that they have adequate capacity to serve those in their region around SUD services (12-24 months); Health Systems Division Develop alternative payment methodologies for Day Treatment Services (12-24months); Health Systems Division Develop standard range of client to clinician ratio (12-24 months); Health Systems Division Develop more culturally relevant training for PDS workers, including a tribal- specific course and Latino- specific course (12-24 months); Office of Equity & Inclusion & Behavioral Health Expand the number and diversity of culturally specific peers within the workforce (12-24 months); Health Systems division & Office of Equity and Inclusion</p>
<p>Coverage of Medication Assisted Treatment (medications, as well as counseling and other services with sufficient provider capacity, to meet needs of Medicaid beneficiaries in the state)</p>	<p>Medication Assisted Treatment services are currently covered under Oregon’s Medicaid State Plan. (All levels of Care) State Plan: MAT- Attachment 3.1-A, section 13.d-</p>	<p>OHA has robust monitoring and evaluation services Capacity of the Peer Delivered Services workforce has been increased (State Plan). OHP SUD system benefits provide</p>	<p>Develop robust quarterly report for internal quality improvement strategies for SUD services (All levels) (0-6 months); Addiction Treatment, Recovery & Prevention Services; Medicaid; and Health Policy & Analytics within OHA. Set standards for identification, initiation,</p>

Milestone 1 Criteria	Current State	Future State	Summary of Actions Needed
	<p>SUD rehab, page 6.d.12</p> <p>Also covered under State Plan:</p> <p>Medication management and monitoring:</p> <p>Attachment 3.1-A, section 13.d-SUD rehab, page 6.d.12</p> <p>Peer Delivered Services are a covered available benefit. (All levels of treatment)</p>	<p>full continuum of care to include prevention, early intervention, and crisis intervention services (State Plan)</p> <p>Each year we will improve rates of identification, initiation, and engagement</p> <p>Increase rates of identification, initiation, and engagement</p> <p>Provider capacity has been increased adequately at varying clinical settings (such as office-based, Emergency Department, Primary Care, Tele-health, bridge clinics, residential etc.)</p> <p>Increased qualified workforce</p> <p>Each provider will have been reviewed and confirmed has adequate staffing for this level of care</p> <p>The number and diversity of culturally specific peers within the</p>	<p>and engagement.</p> <p>Educate and engage providers around these standards and implementation (12-24 months); Health Systems Division</p> <p>Develop requirement for CCOs to have a mechanism to ensure that they have adequate capacity to serve those in their region around SUD services (12-24 months); Health Systems Division</p> <p>Develop standard range of client to clinician ratio (12-24 months); Health Systems Division</p> <p>Engage with CCOs around adequate capacity levels for MAT and their service areas. (12-24 months); Health Systems Division</p> <p>Develop provider review process around staffing levels (12-24 months); Health System Division</p> <p>Develop more culturally relevant training for peer workers, including a tribal- specific course and Latino- specific course (12-24 months); Office of Equity & Inclusion & Behavioral Health</p> <p>Expand the number and diversity of culturally specific peers within the workforce (12-24 months); Health Systems</p>

Milestone 1 Criteria	Current State	Future State	Summary of Actions Needed
		workforce has been expanded	division & Office of Equity and Inclusion
Coverage of intensive levels of care in residential and inpatient settings	Residential and inpatient services are currently covered under Oregon’s Medicaid State Plan. (ASAM 3.1,3.3,3.5, 3.7, 4) Currently, State funding supplements treatment that is not Medicaid-covered due to the IMD exclusion. State Plan: Attachment 3.1-A, section 13.d-SUD rehab, page 6.d.12 Peer Delivered Services are a covered available benefit. (All levels of treatment)	OHA has robust monitoring and evaluation services Increase the Peer Delivered Services workforce Each year we will improve rates of identification, initiation, and engagement Increase provider capacity Each provider will have been reviewed and confirmed has adequate staffing for this level of care The number and diversity of culturally specific peers within the workforce has been expanded	Develop robust quarterly report for internal quality improvement strategies for SUD services (All levels) (0-6 months); Addiction Treatment, Recovery & Prevention Services; Medicaid; and Health Policy & Analytics within OHA. Set scope of work for the workforce regarding SUD crisis intervention services and establish reimbursement rate. (12-24 months); Health Systems Division Set standards for identification, initiation, and engagement. Educate and engage providers around these standards and implementation (12-24 months); Health Systems Division Develop requirement for CCOs to have a mechanism to ensure that they have adequate capacity to serve those in their region around SUD services (12-24 months); Health Systems Division Develop standard range of client to clinician ratio

Milestone 1 Criteria	Current State	Future State	Summary of Actions Needed
			(12-24 months); Health Systems Division Develop provider review process around staffing levels (12-24 months); Health System Division Develop more culturally relevant training for PDS workers, including a tribal- specific course and Latino- specific course (12-24 months); Office of Equity & Inclusion & Behavioral Health Expand the number and diversity of culturally specific peers within the workforce (12-24 months); Health Systems division & Office of Equity and Inclusion
Coverage of medically supervised withdrawal management	Medical Withdrawal services are currently covered under Oregon’s Medicaid State Plan. (ASAM 3.7, 4) Currently, State funding supplements treatment that is not Medicaid-covered due to the IMD exclusion. State Plan: Detox- Attachment 3.1-A, section 13.d- SUD rehab, page 6.d.13. Adult benefit Plan- TN	OHA has robust monitoring and evaluation services Each year we will improve rates of identification, initiation, and engagement Each provider will have been reviewed and confirmed has adequate staffing for this level of care Each provider will have been reviewed and confirmed has adequate staffing	Develop robust quarterly report for internal quality improvement strategies for SUD services (All levels) (0-6 months); Addiction Treatment, Recovery & Prevention Services; Medicaid; and Health Policy & Analytics within OHA. Set scope of work for the workforce regarding SUD crisis intervention services and establish reimbursement rate. (12-24 months); Health Systems Division Set standards for identification, initiation, and engagement. Educate and engage providers around these

Milestone 1 Criteria	Current State	Future State	Summary of Actions Needed
	17-0003 form ABP 5	for this level of care	standards and implementation (12-24 months); Health Systems Division Develop requirement for CCOs to have a mechanism to ensure that they have adequate capacity to serve those in their region around SUD services (12-24 months); Health Systems Division Develop standard range of client to clinician ratio (12-24 months); Health Systems Division Develop provider review process around staffing levels (12-24 months); Health System Division
Parity of Coverage in SUD service array.	Case Management Services for individuals with only SUD are not a covered Oregon Medicaid State Plan benefit. State Plan: Peer Delivered Services: Attachment 3.1-A, section 13.d-SUD rehab, page 6.d.14. Case Management Services (listed as care coordination) 3.1-A, section 13.d-SUD rehab, page 6.d.12	A SPA and OAR changes are completed to expand the use of case management for pre and post treatment and for community-based services and supports such as skills restoration and employment	Oregon will meet with agencies that provide these services (funded through state funds and federal grants) to develop a structure and draft regulations for this service. (12-24 months); Behavioral Health & Medicaid Develop reimbursement rates for agencies to provide this service (12-24 months); Actuarial Services & Addiction Treatment, Recovery & Prevention Services Implement service by 24 months past start (12-24 months); Health Systems Division The state will pursue a SPA and OAR changes to expand the use of case

Milestone 1 Criteria	Current State	Future State	Summary of Actions Needed
			management for pre and post treatment and for community-based services and supports such as housing and employment (12-24 months); Health Systems Division

2. USE OF EVIDENCE-BASED, SUD SPECIFIC PATIENT PLACEMENT CRITERIA

Milestone 2 Criteria	Current State	Future State	Summary of Actions Needed
Criteria for completion of milestone	Provide an overview of current state use of evidence-based, SUD-specific patient placement criteria and utilization management approach to ensure placement in appropriate level of care and receipt of services recommended for that level of care	Provide an overview of planned state implementation of requirement that providers use an evidence-based, SUD-specific patient placement criterion and use of utilization management to ensure placement in appropriate level of care and receipt of services recommended for that level of care.	Specify a list of action items needed to be completed to meet milestone requirements. Include persons or entities responsible for completion of each action item. Include timeframe for completion of each action item
Implementation of requirement that providers assess treatment needs based on SUD-specific, multi-dimensional assessment tools that reflect evidence-based clinical treatment guidelines	Current State OARs 309-018 and 309-019 require SUD outpatient (O/P) and residential assessments to include all ASAM PPC dimensions.	State OARs 309-018 and 309-019 continue to require SUD O/P and residential assessments to include all ASAM PPC dimensions.	None
Implementation of a utilization management approach such that (a) beneficiaries have access to SUD services	For over 20 years Oregon has required, and continues to require, SUD Providers to assess	CCOs will be monitored to ensure prior authorization staff are adequately trained in ASAM	Refine contract language with CCOs to include ASAM (12-24 months); Health Systems Division

Milestone 2 Criteria	Current State	Future State	Summary of Actions Needed
at the appropriate level of care	<p>treatment needs based on multi-dimensional ASAM assessment tools that reflect evidence-based clinical guidelines for all levels of care, per licensing regulation and state contracts</p> <p>SUD services for individuals on Fee for Service (FFS) are retrospectively reviewed for appropriateness but do not require prior authorization. The provider is responsible to ensure the client meets the criteria for the appropriate level of care and the OARS are followed. These are reviewed during the Licensing and Certification staff and Medicaid Program Integrity staff as appropriate, or as the OARs require for licensing or certification.</p> <p>Within contracts, the CCOs are required to ensure prior authorization is no more stringent than the FFS implementation but may operationalize this differently.</p> <p>Providers and staff are to be adequately</p>	criteria and SUD treatment services	Monitor CCOs to ensure prior authorization staff are adequately trained in ASAM criteria and SUD treatment services

Milestone 2 Criteria	Current State	Future State	Summary of Actions Needed
	trained in ASAM Criteria and SUD treatment services		
Implementation of a utilization management approach such that (b) interventions are appropriate for the diagnosis and level of care	Current State OARs 309-018 and 309-019 require SUD outpatient and residential service plans to reflect information included in the assessment. Health Services Division (HSD) reviews a sample of the plans for compliance during renewal reviews.	State OARs 309-018 and 309-019 will be revised to specify services that must be provided for each ASAM level of care. State licensing/certification site reviews will include assessment of compliance with this requirement to ensure that service plans reflect appropriate interventions for the diagnosis and the ASAM level of care.	Consult with DOJ – (3-6 months); Health Systems Division Consult with providers and other stakeholders – (6-12 months); Health Systems Division Develop and implement policy and OAR amendments – (12-18 months); Health Systems Division Provide training to providers regulated by the new rules (in person, onsite technical assistance and webinar.) – (12-24 months); Health Systems Division
Implementation of a utilization management approach such that (c) there is an independent process for reviewing placement in residential treatment settings	HSD’s Licensing and Certification e Unit conducts site visits and clinical review of charts and notes every 2 years to determine compliance with OARs.	Continue to monitor placement criteria within the site and clinical reviews.	None

3. USE OF NATIONALLY RECOGNIZED SUD-SPECIFIC PROGRAM STANDARDS TO SET PROVIDER QUALIFICATIONS FOR RESIDENTIAL TREATMENT FACILITIES

Milestone 3 Criteria	Current State	Future State	Summary of Actions Needed
Criteria for completion of milestone	Provide an overview of current provider qualifications for residential	An overview of planned use of nationally recognized SUD-specific program	Specify a list of action items needed to be completed to meet milestone requirements. Include persons or

Milestone 3 Criteria	Current State	Future State	Summary of Actions Needed
	treatment facilities and how these compare to nationally recognized SUD-specific program standards, e.g., the ASAM Criteria	standards in improving provider qualifications for residential treatment facilities is provided	entities responsible for completion of each action item. Include timeframe for completion of each action item
Implementation of residential treatment provider qualifications in licensure requirements, policy manuals, managed care contracts, or other guidance. Qualification should meet program standards in the ASAM Criteria or other nationally recognized, SUD-specific program standards regarding, in particular, the types of services, hours of clinical care, and credentials of staff for residential treatment settings	Current Oregon OARs 309-018 and 309-019 specify qualifications and competencies that must be met to qualify to provide SUD treatment. There is no distinction in the qualifications or competencies pertaining to levels of care. Current Oregon OAR 309-018 identifies some types of services in residential settings including smoking cessation, parenting and some life skills. There are no staffing ratios, or number of hours specified.	State OARs 309-018 and 309-019 will be revised to specify requirements for qualifications and competencies for individuals providing treatment services in each level of care, consistent with ASAM. OAR 309-018 and 309-019 will be revised to specify requirements and standards for clinical care including comprehensive services that address clinical needs and social determinants of health, staffing ratios and total hours of care provided in each level of care, consistent with ASAM.	Consult with DOJ – (3-6 months)); Health Systems Division Consult with providers and other stakeholders – (6-12 months); Health Systems Division Develop and implement policy and OAR amendments – (12-18 months); Health Systems Division Provide training to providers regulated by the new rules (in person, onsite technical assistance and webinar.) – (18-24 months); Health Systems Division
Implementation of a state process for reviewing residential treatment providers to	OARs 309-008 and 415-012 specify processes and standards for	OARs 309-008 and 415-012 will be revised to specify the process	Update and implement the process for initial and renewal certification and licensure – (6-12

Milestone 3 Criteria	Current State	Future State	Summary of Actions Needed
ensure compliance with these standards	certification and licensure of SUD O/P and residential programs. Current licensure allows programs to provide all levels of residential services. Current certification allows programs to provide all levels of outpatient services.	and standards for certification and licensure of each ASAM level of care in both O/P and residential programs. OHA/HSD-issued certificates and licenses will identify specific levels of care for each provider.	months); Licensing and Certification Unit <ul style="list-style-type: none"> Licensing and Certification Unit: Develop certificate and license types for each level of care – (6-12 months) Update licensing and certification data base – (6-12 months); Licensing and Certification Unit:
Implementation of requirement that residential treatment facilities offer MAT on-site or facilitate access to MAT off-site	In residential programs, current OAR requires that providers assist individuals to access MAT by coordinating services and making transportation available. O/P programs are not required to provide this service, although they are not permitted to deny entry to individuals who currently receive MAT.	OAR will be revised to require that residential providers make MAT available on-site or provide coordination services to off-site MAT services including assisting with access, payment issues, transportation, and daycare.	Consult with DOJ – (3-6 months); Health Systems Division Consult with providers and other stakeholders – (6-12 months); Health Systems Division Develop and implement policy and OAR amendments – (12-25 months); Health Systems Division

4. SUFFICIENT PROVIDER CAPACITY AT CRITICAL LEVELS OF CARE INCLUDING FOR MEDICATION ASSISTED TREATMENT OF OUD

Milestone 4 Criteria	Current State	Future State	Summary of Actions Needed
Criteria for completion of milestone	Provide an overview of current provider capacities throughout the state to provide SUD treatment at each of the critical levels of care listed in Milestone 1.	An overview of planned improvements to provider availability and capacity intended to improve Medicaid beneficiary access to treatment throughout the State at each of the critical levels of care listed in Milestone 1 is provided.	Specify a list of action items needed to be completed to meet milestone requirements. Include persons or entities responsible for completion of each action item. Include timeframe for completion of each action item
Completion of assessment of the availability of providers enrolled in Medicaid and accepting new patients in the following critical levels of care throughout the state (or at least in participating regions of the state) including those that offer MAT; Outpatient Services; Intensive Outpatient Services; Medication Assisted Treatment (medications as well as counseling and other services);	Oregon is conducting a provider capacity study for key levels of care in the state. A capacity management and referral tracking data base is currently being implemented through a contract with a vendor: Lines for Life. In 2019 the focus will be on SUD Outpatient services including Office Based Opioid Treatment (OBOT) settings and Opioid Treatment Program (OTP) as well as MAT services Oregon has identified statewide Opioid	Provider capacity study will be completed and used to identify areas of high need. SUD services are available at appropriate client to provider ratios including reasonable access, admittance times, and reasonable geographic distances for patients to travel to clinically appropriate services. The capacity management and referral tracking data base will be implemented statewide for all critical levels of care.	Create action plan to address deficits within the delivery system identify within the capacity study. (6- 12 Months); Health Systems Division Implement the plan to address the delivery system deficits (12-24 months); Health Systems Division Assess current client to provider ratios for all levels of treatment (0-6 months); Health Systems Division Develop the appropriate client to provider ratios (6- 12 months); Health Systems Division Develop a plan to address any gaps in provider ratio (12-18 months); Health System Division Begin to implement changes addressing the gaps in provider ratios that were identified in service areas (18-24 months); Health Systems Division

Milestone 4 Criteria	Current State	Future State	Summary of Actions Needed
Intensive Care in Residential and Inpatient Settings; Medically Supervised Withdrawal Management.	Use Disorder treatment capacity in both OBOT settings and OTP settings.	Regional needs have been identified and addressed for MAT in both OTP and OBOT treatments.	<p>Implement the capacity management and referral tracking data base for all SUD residential services (ASAM levels 3-4) including MAT and withdrawal management (12-24); vendor: Lines for Life.</p> <p>Identify needs for MAT in OTP and OBOT settings. (6-12 months); Health Systems Division</p> <p>Develop plan to meet needs of MAT in OTP and OBOT settings (12-18 months); Health Systems Division</p> <p>Implement plan to address needs of MAT in OTP and OBOT settings (18-24 months); Health Systems Division</p> <p>Assess the number of covered lives, availability of prevalence, incidents and diagnosis rates by region/CCO (12-24 months); Health Systems Division</p>
Increase provider capacity across all levels	Oregon has contracted with the Farley Center to conduct a Healthcare Workforce Assessment was completed March 2019	The Healthcare workforce needs will be identified and addressed.	<p>Asses the needs of the Healthcare workforce identified in the assessment. (12-24 Months); Health Systems Division</p> <p>Develop the plan to address workforce issues to include activities such as (focus groups, partnerships with providers and CCOs, etc....) (12-24 months); Health Systems Division</p>

5. IMPLEMENTATION OF COMPREHENSIVE TREATMENT AND PREVENTION STRATEGIES TO ADDRESS OPIOID ABUSE AND OUD

Milestone 5 Criteria	Current State	Future State	Summary of Actions Needed
Criteria for completion of milestone	Provide an overview of current treatment and prevention strategies to reduce opioid abuse and OUD in the state.	Provide an overview of planned strategies to prevent and treat opioid abuse and OUD.	Specify a list of action items needed to be completed to meet milestone requirements as detailed above. Include persons or entities responsible for completion of each action item. Include timeframe for completion of each action item
Implementation of opioid prescribing guidelines along with other interventions to prevent opioid abuse	In 2016, the Oregon Health Authority (OHA) convened a task force to develop opioid prescribing guidelines around chronic pain and for dentists. These guidelines include recommendations for working directly with patients on treatment planning, emphasis on non-pharmacologic and non-opioid pharmacolites. OHA adopted the opioid prescribing guidelines around chronic pain and dentistry ⁸ . These	OHA will continue to emphasize individualized patient care, non-pharmacologic treatment options, and awareness around OUD in the primary care as well as ED settings. Educated providers and implemented new guidelines and best practices around opioid use and prescribing. Evaluated Chronic and Acute pain prescribing guidelines for updates to treatment recommendations, if required.	Provide greater behavioral health supports (TA, education, etc.) for opioid prescribers and health systems. Especially in primary care and emergency settings to both assist patients in reducing total Morphine equivalent doses (MED) and identify SUD/OUD cases which may need individualized care. (12-24 months); Transformation Center & Health Systems Division Health Evidence Review Commission to align payment structure with prescribing guidelines. (0-12

⁸ “Oregon Opioid Prescribing Guidelines (Chronic).” *OHA*. November 2016. <https://www.oregon.gov/oha/PH/PREVENTIONWELLNESS/SUBSTANCEUSE/OPIOIDS/Documents/taskforce/oregon-opioid-prescribing-guidelines.pdf>

Milestone 5 Criteria	Current State	Future State	Summary of Actions Needed
	<p>were implemented November 17, 2016 In 2018, OHA convened a task force to develop guidelines around Acute pain and prescribing. The opioid prescribing guidelines⁹ around Acute pain were adopted by Oregon Health Authority on October 20, 2018</p>	<p>Current payment structure is aligned with recommended chronic and Acute prescribing guidelines</p>	<p>months); Health Systems Division</p>
<p>Expanded coverage of, and access to, naloxone for overdose reversal</p>	<p>Per HB3440 (2017) passage, all training requirements, special conditions, including access by social service agencies to Naloxone, and the usage of it have been removed. All Oregonians in any settings can utilize Naloxone without prior training for other conditions. Pharmacists may dispense Naloxone at the point of sale. Oregon Health Plan fee-for-service program (directly administered by OHA) has no prior</p>	<p>Federal grants (STR/SOR) and other initiatives will continue to fund and increase access to naloxone statewide, especially in areas where there are gaps including rural, frontier and coastal areas. Continue cross-division partnerships and funding for the PDO position(s). Work together on opioid crisis response collectively to activities such as overdose outbreaks.</p>	<p>Continue to distribute Naloxone in areas of high need. (0-6 Months); Health Systems Division Continue cross-divisional collaboration at state and local level (0-24 Months); Health Systems Division Increase communication between partners around the alignment of payment structure as it relates to Naloxone to increase access to and penetration of the population at greatest risk and need. (6-12 Months); Health Systems Division Continue to encourage use and provide TA around Naloxone</p>

⁹ “Oregon Acute Opioid Prescribing Guidelines.” OHA. October 2018.
https://www.oregon.gov/OSBN/pdfs/Resource_OregonAcuteOpioidPrescribingGuidelines.pdf

Milestone 5 Criteria	Current State	Future State	Summary of Actions Needed
	<p>authorization for Naloxone; CCO coverage varies. Cross-division partnerships with OHA, Public Health and Health Systems Divisions as well as partnerships with local health departments to fund the Prescription Drug Overdose coordinator(s) (PDO). PDOs will continue to assist in coordinating local naloxone distribution efforts.</p>	<p>Continue to support CCO engagement with the Transformation Center and other resources for technical assistance (TA) around Naloxone distribution and utilization.</p>	<p>access, use and distribution to CCOs through the Transformation Center. (0-6 months); Transformation Center & Health Systems Division</p>
<p>Implementation of strategies to increase utilization and improve functionality of Prescription Drug Monitoring Programs (PDMP)</p>	<p>As of January 2018, medical and pharmacy directors will be allowed access to the PDMP regarding their respective entities. As of February 2018, through HB 4143, the PDMP registration is mandatory for healthcare practitioners who are authorized to prescribe schedule II through IV controlled medications. Public health and education regarding the value</p>	<p>Continue funding the PDMP program to data access, analysis, and improve upon the surveillance potential. Utilize this data to assess the impact of opioid use statewide and engage those communities most impacted by the effects of the opioid crisis. Continue to collaborate with healthcare licensing boards within Oregon to encourage safe and appropriate</p>	<p>Continue to collaborate with provider licensing boards (continuous); Health Systems Division Educate and engage with provider organizations, CCOs, and healthcare prescribers to increase the number of registered individuals who utilize the system (12-24 months); Health Systems Division</p>

Milestone 5 Criteria	Current State	Future State	Summary of Actions Needed
	of PDMP registration and utilization are ongoing to providers and organizations.	controlled substance prescribing. The number of healthcare prescribers who use the PDMP beyond the required registration increased.	
Other	In February 2018 the passage of HB 4143 passed the (Opioid Rapid Response Project), provided resources to create more direct links between ED and appropriate treatment and resources including increased availability of MAT in the ED and using peer delivered services to facilitate the link between ED and appropriate treatment/ resources. This two-year pilot project started in January 2019 beginning in four Oregon counties. Under the Oregon State Plan currently peer delivered services are covered when delivered as part of a treatment plan	The Opioid Rapid Response Project was expanded statewide to other high risk and high burden counties. Coverage of community integration services and supports specifically for housing are implemented; ensuring safe housing in an appropriate recovery environment, special attention and effort around MAT housing	Leverage opportunities to secure more funding (federal grants, Federal opioid project funding, state funds etc.) to expand Opioid Rapid Response project statewide. (12-24 months); Health Systems Division Increase capacity of culturally-relevant PDS workforce (12-24 months); Health Systems Division Increase the number of culturally-relevant trainings (including tribal) to be developed and provided statewide (12-24 months); Office of Equity & inclusion & Health Systems Division Workforce development efforts around community integration/ housing support specialists as Medicaid participating providers (12-24 months); Health Systems Division

Milestone 5 Criteria	Current State	Future State	Summary of Actions Needed
	under the supervision of a licensed program or provider		

6. IMPROVED CARE COORDINATION AND TRANSITIONS BETWEEN LEVELS OF CARE

Milestone 6 Criteria	Current State	Future State	Summary of Actions Needed
Implementation of policies to ensure residential and inpatient facilities link beneficiaries with community-based services and supports following stays in these facilities	Provide an overview of current care coordination services and transition services across levels of care.	Provide an overview of planned improvements to care coordination services and transition services across levels of care.	Specify a list of action items needed to be completed to meet milestone requirements. Include persons or entities responsible for completion of each action item. Include timeframe for completion of each action item
Creation and implementation of additional policies to ensure coordination of care for co-occurring physical and mental health conditions	Under Oregon’s current structure, SUD services are covered under physical health services and behavioral health care coordination is the responsibility of the CCOs To support OHA’s ED Disparity Measure for CCOs, the hospital notifications product, The Collective (formerly called Pre-Manage), has	CCOs increased their capacity to provide warmer hand offs between levels of care through enhanced coordinated care for SUD services OHA will continue to work on optimization and education on the ED disparity measure flags provided through The Collective.	Provide support to CCOs through TA and training to increase capacity and quality of SUD care transitions (12-24 months) CCO 2.0 includes language requiring CCOs use hospital event notifications and make them- and health information exchange for care coordinating-accessible to primary care, behavioral health and dental organizations. (12-24 months)

Milestone 6 Criteria	Current State	Future State	Summary of Actions Needed
	<p>added a flag for CCOs and their contracted clinics to alert when a Medicaid member with Severe and Persistent Mental Illness (SPMI) has a hospital event for a physical reason for coordination of care among CCOs and providers.</p> <p>Those in Medication Assisted Treatment for SUD, IV drug users, and individuals with SUD in need of withdrawal management were added as prioritized population (2020) for the CCOs in 2020.</p> <p>An educational series, specifically for CCOs was provided in early 2019 to support improving care coordination services.</p> <p>Oregon OARs clearly dictate the expectations for a patient transfer between providers in OARs 309-018-0155 and 309-018-0210. Included in these are how to</p>		

Milestone 6 Criteria	Current State	Future State	Summary of Actions Needed
	<p>advocate for patient rights if a grievance in placement is present. Some of these guidelines are that the providers will coordinate and provide appropriate referrals, complete a transfer summary (and what is required within a summary), report all instances of transfer in the state's data system, and to provide all documentation in the service record requested by receiving provider as well as a complete transfer summary within 30 days.</p>		

SECTION II- IMPLEMENTATION ADMINISTRATION

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Section III- Relevant Documents

Please provide any additional Documentation or information that the state deems relevant to successful execution of the implementation plan.

Attachment A- Milestone 5a- SUD Health Information Technology (IT) Plan

Section I.

Milestone 5a Criteria	Current State	Future State	Summary of Actions Needed
<p>5. Implementation of comprehensive treatment and prevention strategies to address Opioid Abuse and OUD, that is:</p> <p>--Enhance the state's health IT functionality to support its PDMP; and</p> <p>--Enhance and/or support clinicians in their usage of the state's PDMP.</p>	<p>Provide an overview of current PDMP capabilities, health IT functionalities to support the PDMP, and supports to enhance clinicians' use of the state's health IT functionality to achieve the goals of the PDMP.</p>	<p>Provide an overview of plans for enhancing the state's PDMP, related enhancements to its health IT functionalities, and related enhancements to support clinicians' use of the health IT functionality to achieve the goals of the PDMP.</p>	<p>Specify a list of action items needed to be completed to meet the HIT/PDMP milestones identified in the first column. Include persons or entities responsible for completion of each action item. Include timeframe for completion of each action item</p>
<p>Prescription Drug Monitoring Program (PDMP) Functionalities</p>			
<p>Enhanced interstate data sharing to provide prescribers a more comprehensive prescription history for patients with prescriptions across state lines.</p>	<p>Oregon PDMP can share data with states that meet privacy and security standards.</p> <p>Oregon has circulated Memoranda of Understanding (MOUs) to western states.</p>	<p>Connection of Oregon's PDMP with contiguous states to allow secure sharing of PDMP data.</p>	<p>(6-24 months) Oregon PDMP will continue conversations states as needed and continue to participate in data hub meetings. months); At least once a year contact will be made, more as</p>

Milestone 5a Criteria	Current State	Future State	Summary of Actions Needed
	<p>Interstate data sharing agreements are in place with Idaho, Kansas, Nevada, Texas, and North Dakota.</p> <p>Oregon PDMP joined the data sharing hub Rx Check. This will assist in resolving legal and technical barriers for interstate data sharing.</p> <p>Oregon is also a PMPI (National Association of Boards of Pharmacy) state and is an active and ongoing participant in the groups' activities. This work is ongoing, and is performed by PDMP staff, in the Public Health Division of the Oregon Health Authority, with oversight provided by the appointed Oregon PDMP Advisory Committee.</p>		<p>needed and available (12-24 months; ongoing); Injury Violence Prevention Promotion, Public Health Division.;</p> <p>-</p>
<p>Enhanced “ease of use” for prescribers and other state and federal stakeholders</p>	<p>Prescribers (physicians (MD, PA, DO), Pharmacists (RPh), Nurse Practitioners (NP/CNS-PP), Dentists (DDS/DMD), and Naturopaths (ND), across Oregon, are allowed access to the</p>	<p>PDMP integration with most prescriber systems. Integrated PDMP supports clinician ease of use by pulling PDMP data into their electronic workflow for “one-click” access.</p>	<p>(6-24 months), the PDMP will collaborate with HIT Commons and other stakeholders to:</p> <ul style="list-style-type: none"> - Educate on certain registration and technical thresholds

Milestone 5a Criteria	Current State	Future State	Summary of Actions Needed
	<p>PDMP system after registration.</p> <p>Medical and Pharmacy Directors are allowed access for the purpose of overseeing prescribing and dispensing within their respective entities.</p> <p>Prescribers and Medical and Pharmacy Directors are allowed delegates.</p> <p>Oregon has a statewide initiative to integrate PDMP into health IT systems, including: EHRs, HIEs, pharmacy management systems, and the statewide hospital event notification system Edie.</p> <p>Oregon PDMP has partnered with the HIT Commons (public/private partnership) to help subsidize this connection.</p>		<p>required for integration of prescriber health IT systems with PDMP.</p> <p>Integrate most prescriber systems (representing 16K prescribers and 4 pharmacy chains) with PDMP. Contact will be made no less than annually but will be done as needed. (12-24 months; ongoing); Injury Violence Prevention Promotion, Public Health Division; PDMP will engage with the PDMP Advisory Council and PDMP Integration Steering Committee, no less than annually but are scheduled quarterly and as needed, to develop “ease of use” strategies (enhancements, education, etc.) for prescribers. (12-24 months; ongoing); Injury Violence Prevention Promotion, Public Health Division.</p>
Enhanced connectivity between the state’s PDMP and any statewide, regional or local health information exchange	Under the statewide initiative to integrate PDMP into health IT systems, Community Health Information	Integration of Oregon’s Community Health Information Exchanges with PDMP	PDMP and HIT Commons will continue to work with Oregon’s Community HIEs to integrate with

Milestone 5a Criteria	Current State	Future State	Summary of Actions Needed
	<p>Exchanges (HIEs) can integrate with PDMP.</p> <p>Two of Oregon’s HIEs are working towards integration.</p> <p>Oregon PDMP is working with the HIT Commons (public/private partnership) to help subsidize this connection.</p>		<p>PDMP. (12-24 months; ongoing); Injury Violence Prevention Promotion, Public Health Division.</p> <p>PDMP will work with the HIT Commons, PDMP Integration Steering Committee, and HIE stakeholders to continue to assess enhancements which support clinicians use of HIE to access PDMP data (delegates, training, etc.); contact will be made no less than annually but will be done as needed. Injury Violence Prevention Promotion, Public Health Division.; (12-24 months; ongoing)</p>
<p>Enhanced identification of long-term opioid uses directly correlated to clinician prescribing patterns¹⁰ (see also “Use of PDMP” #2 below)</p>	<p>According to statute, the Oregon PDMP may not evaluate professional practice except through licensing boards or the PDMP Advisory Commission Prescribing Practice Review Subcommittee. The subcommittee provides education</p>	<p>Continued leveraging of the PDMP Advisory Commission Clinics Review Subcommittee and continued collaboration with Oregon Pain Management Commission to educate prescribers</p>	<p>PDMP will convene the Clinical Review Subcommittee with a quorum to redefine and update thresholds for risky prescribing at minimum once per year. (12-24 months; ongoing); Injury Violence Prevention Promotion, Public Health Division.;</p>

¹⁰ Shah A, Hayes CJ, Martin BC. Characteristics of Initial Prescription Episodes and Likelihood of Long-Term Opioid Use — United States, 2006–2015. MMWR Morb Mortal Wkly Rep 2017;66:265–269. DOI: <http://dx.doi.org/10.15585/mmwr.mm6610a1>.

Milestone 5a Criteria	Current State	Future State	Summary of Actions Needed
	<p>and resources to the highest prescribers.</p> <p>The PDMP has collaborated with the Oregon Pain Management Commission to develop a free Continuous Medical Education (CME) module on pain management; so far more than 5,000 providers have taken the course.</p>	<p>for informed prescribing choices.</p>	<p>PDMP will continue to work with licensing boards to ensure that licensees are registered with the PDMP as mandated by statute; contact will be made no less than annually but will be done as needed and reviewed by the PDMP Advisory Committee quarterly. Injury Violence Prevention Promotion, Public Health Division.; (12-24 months; ongoing)</p> <p>The PDMP will continue to promote the CME resource to stakeholders and enhance education and resources provided to the highest prescribers. Injury Violence Prevention Promotion, Public Health Division.; (12-24 months; ongoing)</p>
Current and Future PDMP Query Capabilities			
<p>Facilitate the state’s ability to properly match patients receiving opioid prescriptions with patients in the PDMP (i.e. the state’s master patient index (MPI) strategy with regard to PDMP query)</p>	<p>States on the AWARe platform share the same patient matching algorithm which uses the available data fields to determine which records should be consolidated to unique individuals. The proprietary vendor</p>	<p>The PDMP will share information with the Governor’s Opioid Epidemic Taskforce to consider future changes to statute which allow data sharing in support of patient matching. Continue PDMP data quality improvement</p>	<p>Oregon State Statute does not currently allow for this exchange of information – OHA Government Relations and PDMP staff continue to monitor legislation as it emerges – all potential legislative</p>

Milestone 5a Criteria	Current State	Future State	Summary of Actions Needed
	<p>(Appriss) algorithm allows for certain non-exact matches such as common misspellings, nicknames, or changes in address.</p>	<p>efforts with propriety vendor for patient data matching processes and analytics.</p>	<p>action monitored as a course of business through the PDMP Advisory Committee, quarterly. The PDMP will continue to engagement with the Governor’s Opioid Epidemic Taskforce, around the topic of allowing data sharing with the Medicaid program or collection of additional fields. As appropriate and in alignment with meeting agendas and topics. Injury Violence Prevention Promotion, Public Health Division.; (12-24 months; ongoing) PDMP will follow any future statute changes from the legislature to enable matching of PDMP and Medicaid data or to allow submission of additional data fields. As available. Injury Violence Prevention Promotion, Public Health Division.; (12-24 months; ongoing) The Oregon PDMP MPI strategy is developed by the AWAxRxE platform vendor (Appriss) and is primarily the responsibility of the</p>

Milestone 5a Criteria	Current State	Future State	Summary of Actions Needed
			<p>vendor. PDMP staff will work with the vendor to incorporate additional data fields required by any statute changes. As required and available. Injury Violence Prevention Promotion, Public Health Division.; (12-24 months; ongoing)</p>
<p>Use of PDMP – Supporting Clinicians with Changing Office Workflows / Business Processes</p>			
<p>Develop enhanced provider workflow / business processes to better support clinicians in accessing the PDMP prior to prescribing an opioid or other controlled substance to address the issues which follow</p>	<p>Prescribers are allowed access to the PDMP system through a web portal after registration. Prescribers are allowed delegates to support clinician workflows. Oregon is in the second year of a three-year statewide initiative to integrate PDMP into health IT systems, including: EHRs, HIEs, pharmacy management systems, and the statewide hospital event notification system EDIE. Oregon PDMP has partnered with the HIT Commons (public/private partnership) to help subsidize this connection.</p>	<p>PDMP integration with most prescriber systems. Integrated PDMP supports clinician ease of use by pulling PDMP data into their electronic workflow for “one-click” access.</p>	<p>PDMP will collaborate with HIT Commons, PDMP Integration Steering Committee, and other stakeholders as needed to:</p> <ul style="list-style-type: none"> – Educate on certain registration and technical thresholds required for integration of prescriber health IT systems with PDMP. – Integrate most prescriber systems (representing 16K prescribers and 4 pharmacy chains) with PDMP. – Share best practices and provide education on leveraging integrated workflows to support informed

Milestone 5a Criteria	Current State	Future State	Summary of Actions Needed
			<p>prescribing of controlled substances.</p> <p>a. Contact will be made no less than annually but will be done as needed and reviewed by the PDMP Advisory Committee quarterly. Injury Violence Prevention Promotion, Public Health Division.; (12-24 months; ongoing)</p> <p>b.</p>
<p>Develop enhanced supports for clinician review of the patients’ history of controlled substance prescriptions provided through the PDMP—prior to the issuance of an opioid prescription</p>	<p>Prescribers can review individual patient records, their own prescribing history, or a threshold report listing all patients that meet certain risky prescribing thresholds (high dose, co-prescribing, etc.). Emergency Department (ED) physicians who have the Emergency Department Information Exchange (EDIE) integrated into their ED track boards may receive PDMP data pushed to them when a patient meets certain criteria, prompting review of patient’s history before prescribing.</p> <p>Additionally, the PDMP allows</p>	<p>PDMP integration with most prescriber health IT systems. PDMP pushed to all ED physicians in Oregon with integrated EDIE in their EHR. PDMP stakeholders are educated and receive assistance.</p>	<p>PDMP staff will collaborate with HIT Commons, PDMP Integration Steering Committee, and other stakeholders as needed to:</p> <ul style="list-style-type: none"> – Enable PDMP to be pushed through EDIE for hospitals who have already integrated the EDIE solution into their EHR – Support rural hospitals who wish to integrate EDIE into their EHR through a grant provided by OHA and the Oregon Association for Hospitals and Health Systems <p>c.</p>

Milestone 5a Criteria	Current State	Future State	Summary of Actions Needed
	prescribers and pharmacists to enable delegates to search the PDMP on their behalf in order to support clinician review of PDMP prior to an opioid prescription issuance.		Contact will be made no less than annually but will be done as needed and reviewed by the PDMP Advisory Committee quarterly. Injury Violence Prevention Promotion, Public Health Division.; (12-24 months; ongoing) d.
Master Patient Index / Identity Management			
Enhance the master patient index (or master data management service, etc.) in support of SUD care delivery.	<p>Oregon’s PDMP collection of data fields is defined by state law.</p> <p>The Oregon PDMP MPI strategy is developed by the AWARe platform vendor (Appriss). The AWARe platform uses a proprietary patient matching algorithm which uses the available data fields to determine which records should be consolidated to unique individuals.</p> <p>The proprietary algorithm allows for certain non-exact matches such as common misspellings, nicknames, or changes in address to achieve an acceptable sensitivity and specificity.</p> <p>The EDIE vendor, used by hospitals to</p>	<p>PDMP utilizes Appriss AWARe platform effectively to support SUD care delivery.</p> <p>PDMP data is pushed through EDIE notifications where hospitals have integrated EDIE into their HER.</p>	<p>Oregon State Statute does not currently allow for this exchange of information – OHA Government Relations and PDMP staff continue to monitor legislation as it emerges – all potential legislative action monitored as a course of business through the PDMP Advisory Committee, quarterly.</p> <p>The PDMP will continue engagement with the Governor’s Opioid Epidemic Taskforce, around statute changes required to allow data sharing with the Medicaid program or collection of additional fields. As available. Injury Violence Prevention Promotion, Public</p>

Milestone 5a Criteria	Current State	Future State	Summary of Actions Needed
	<p>receive pushed PDMP notifications when a patient enters the ED who meets certain criteria, also has a defined algorithm MPI that provides match and patient record merging. This supports SUD care delivery as ED physicians are notified of PDMP data, as well as historical hospital data on the patient at the point of care.</p>		<p>Health Division.; (12-24 months; ongoing)</p> <p>The PDMP will follow any future statute changes that allow data sharing between PDMP and Medicaid to enhance the state MPI in support of SUD care delivery. As available. Injury Violence Prevention Promotion, Public Health Division.; (12-24 months; ongoing)</p> <p>PDMP staff will work with the vendor to incorporate additional data fields required by any statute changes. As available. Injury Violence Prevention Promotion, Public Health Division.; (12-24 months; ongoing)</p>
Overall Objective for Enhancing PDMP Functionality & Interoperability			
<p>Leverage the above functionalities / capabilities / supports (in concert with any other state health IT, TA or workflow effort) to implement effective controls to minimize the risk of inappropriate opioid overprescribing—and to ensure that Medicaid does not inappropriately pay for opioids</p>	<p>Oregon PDMPs mission is primarily to support clinical decision-making. Medical Directors and Pharmacy Directors are allowed access to the PDMP to perform clinical quality assurance activities for the providers they supervise.</p>	<p>Dental Directors and CCO Medical Directors access PDMP data in support of clinical quality assurance activities.</p> <p>PDMP integration with a majority of prescriber systems supports effective controls to minimize the risk of</p>	<p>PDMP will collaborate with HIT Commons, PDMP Integration Steering Committee, and other stakeholders as needed to:</p> <ul style="list-style-type: none"> – Register CCO Medical Directors and Dental Directors if

Milestone 5a Criteria	Current State	Future State	Summary of Actions Needed
	<p>Oregon is in year two of a three-year statewide initiative to integrate PDMP into health IT systems, including: EHRs, HIEs, pharmacy management systems, and the statewide hospital event notification system EDIE.</p> <ul style="list-style-type: none"> - Legislation in 2019 added Dental Directors and CCO Medical Directors to list of authorized users of PDMP 	<p>inappropriate opioid overprescribing by leveraging system functionalities (HIE, EDIE)</p>	<p>legislation is passed.</p> <ul style="list-style-type: none"> - Educate on certain registration and technical thresholds required for integration of prescriber health IT systems with PDMP. - Integrate a majority of prescriber systems (representing 16K prescribers and 4 pharmacy chains) with PDMP. - Share best practices and provide education on leveraging integrated workflows to support informed prescribing of controlled substances. <p>e. Contact will be made no less than annually but will be done as needed and reviewed by the PDMP Advisory Committee quarterly. Injury Violence Prevention Promotion, Public Health Division.; (12-24 months; ongoing)</p> <p>f.</p>

Section II.

- a. Oregon has an enough health IT infrastructure and ecosystem at every appropriate level to achieve the goals of the demonstration.
- b. Oregon’s SUD Health IT Plan is aligned with the state’s Medicaid Health IT Plan and is a component of Oregon’s Behavioral Health (BH) IT Plan. Oregon is currently initiating modernization efforts on its BH IT systems, including SUD IT systems, and will be building a cloud data warehouse, inbound and outbound data interfaces, and longitudinal assessment platforms. This work is a component of the broader Medicaid Health IT Plan which includes Medicaid Modularity and migration of HITECH Act funded systems into the Medicaid Enterprise System.

Section III.

- a. Oregon will include the applicable standards referenced in the ONC Interoperability Standards Advisory (ISA) and 45 CFR 170 Subpart B in a future amendment to the CCO contract. The opportunities to add the SUD waiver requirements to the CCO contract are through an optional amendment in mid-2021 for CCOs that choose early implementation and through the annual restatement for contract year 2022 whereby implementation will be mandatory for all CCOs. Oregon’s most recent procurement for CCO contracts occurred in 2019, with contracts awarded for the period of 2020-2024; Oregon does not anticipate any need to re-procure CCO contracts during the SUD waiver implementation period.
 - i. Relevant examples of specific health IT standards referenced in the ISA that are relevant for this demonstration include:
 - 1. Electronic Prescribing – A Prescriber’s Ability to Obtain a Patient’s Medication History from a Prescription Drug Monitoring Program (Section II-I)
 - 2. “Direct” transport standards
 - 3. Documenting and Sharing Care Plans - Care Plan standards (CDA)
 - 4. Sending a Notification of a Patient’s Admission, Discharge and/or want Transfer Status to Other Providers - ADT Alerting and Messaging
 - 5. Clinical Quality Measurement and Reporting

Demonstration Administration

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ATTACHMENT D
Reserved

**ATTACHMENT E:
SUD Evaluation Design**

Oregon Health Plan Substance Use Disorder
1115 Demonstration

EVALUATION PLAN

October 5, 2021

Table of Contents

A.	General Background Information.....	3
1.	Name and Duration of the Demonstration	3
2.	Demonstration Goals.....	3
3.	Demonstration Activities and Implementation	4
4.	Population Groups Impacted by the Demonstration	5
5.	Other Relevant Contextual Factors	6
B.	Evaluation Questions and Hypotheses.....	8
1.	Driver Diagram.....	8
2.	Evaluation Hypotheses and Measures.....	9
C.	Methodology.....	18
1.	Evaluation Design Summary.....	18
2.	Target and Comparison Populations	18
3.	Evaluation Period	18
4.	Data Sources and Preparation.....	19
5.	Quantitative Methods	21
6.	Qualitative Methods	29
7.	Evaluation Reports.....	31
8.	Support Tasks.....	31
D.	Methodological Limitations.....	32
E.	Additional Information/Attachments.....	33
1.	Independent Evaluator Selection Process.....	33
2.	Timeline	33
3.	Evaluation Budget.....	35
4.	Data Elements	37

A. General Background Information

1. Name and Duration of the Demonstration

Like the rest of the country, Oregon has struggled in recent years with a rise in substance use disorders (SUD), especially related to use of opioids. Data from the Substance Abuse and Mental Health Services Administration (SAMHSA) indicate that in 2018 & 2019, 9.5 percent of Oregonians ages 12 and older had a substance use disorder (SUD), and more than 600 people died of a drug related overdose in 2019. Approximately 7% of adults in Oregon reported needing but not receiving treatment for alcohol use disorder, compared to an average U.S. rate of 5.4%; 2.9% of adults in Oregon reported needing but not receiving treatment for illicit drug use disorders, compared to an average U.S. rate of 2.7%. Oregon recognizes that in order to combat this problem, better systems are needed that will improve access to SUD treatment, improve provider capacity, and implement effective standards of care. To this end, they submitted this waiver application, entitled "Oregon Health Plan Substance Use Disorder 1115 Demonstration" (Project Number 11-W-00362/10)." The project was approved on April 8, 2021, and will continue through March 31, 2026. This demonstration project is designed both to augment existing programs/initiatives and to implement new strategies to help Oregon meet these goals.

2. Demonstration Goals

The overall purpose of the waiver is to increase capacity to enhance Oregon's SUD treatment system and create a full continuum of care such that Medicaid beneficiaries have access to the appropriate levels of SUD treatment, including prevention, early intervention services, Medication Assisted Treatment (MAT), residential treatment, and a range of recovery support services. Under this integrated system, Medicaid beneficiaries will be able to access SUD services before their conditions progress to the point of needing prolonged, costly, and complex treatment. Specific goals are listed below.

1. Assist Oregon in increasing identification, initiation, and engagement of Medicaid beneficiaries diagnosed with SUD;
2. Assist the state in increasing beneficiary adherence to, and retention in, SUD treatment programs;
3. Assist Oregon in reducing inappropriate or preventable utilization of emergency departments and inpatient hospital settings through improved access to a continuum of care services; and
4. Provide a continuum of care to increase the chances of Medicaid beneficiaries of having a successful recovery process.

To achieve these goals, Oregon's implementation plan outlines the selected path to provide a full continuum of care for all Medicaid beneficiaries with Opioid Use Disorder (OUD) and other SUDs, regardless of age. This includes expanding access and improving outcomes in the most cost-effective manner possible.

Six key milestones will be used to guide implementation of Oregon's SUD demonstration:

1. Access to critical levels of care for OUD and other SUDs;
2. Use of evidence-based, SUD-specific patient placement criteria;
3. Use of nationally recognized SUD program standards to set provider qualifications for residential treatment facilities;
4. Sufficient provider capacity at critical levels of care, including for Medication Assisted Treatment of OUD;
5. Implementation of comprehensive treatment and prevention strategies to address opioid abuse and OUD;
6. Improved care coordination and transitions between levels of care.

3. Demonstration Activities and Implementation

The demonstration will explore whether providing a full continuum of care for SUD, including housing and employment support services, will reduce opioid-related overdoses and opioid-related deaths and improve health outcomes in Medicaid and CHIP recipients.

In this section we specifically describe in more detail two new strategies that this demonstration will implement:

1. Claim Federal reimbursement for treatment given in SUD Institutions for Mental Diseases (IMDs), SUD treatment programs with more than 16 beds.
2. Develop housing and employment support services for members with SUD that will provide transition assistance and build skills for maintaining housing.

We briefly describe each of these strategies below.

Federal Funding for SUD IMD Services

As of August 2021, Oregon had 71 SUD adult residential programs, of which 39 were licensed SUD IMDs (21 of them serving OHP members). Prior to the demonstration, federal rules precluded Federal Financial Participation (FFP) for SUD IMD stays, requiring the state to use general fund dollars to pay for stays for OHP members. The demonstration will allow Oregon to obtain FFP for SUD treatment services provided to all beneficiaries residing in SUD IMDs for the duration of treatment deemed clinically necessary. The state also aims to increase enrollment of SUD IMDs as OHP participating providers in order to improve provider networks across the state and meet the demand of this level of care. Implementation of the IMD exemption under this waiver will increase the Medicaid delivery system's capacity for residential SUD services and OHP members' access to SUD services. Oregon will monitor these changes over time, ensuring an adequate provider network.

Community Integration Services

Under this demonstration waiver, Oregon also intends to provide Community Integration Services (CIS) which consists of housing and employment supports to assist individuals with SUD who meet a risk factor identified in the CIS needs-based criteria. The state will provide individual housing and

tenancy sustaining services, community transition services and pre-employment and employment support services to beneficiaries with an SUD diagnosis with an American Society of Addiction Medicine (ASAM) criteria (or equivalent assessment) level 1.0 or higher, indicating the need for outpatient SUD treatment. Individuals are also required to demonstrate specific risk factors to be eligible for services, which includes risk of homelessness, fleeing domestic violence, or being unable to be gainfully employed for at least 90 consecutive days in the past 12 months due to a mental or physical impairment. Services will be available to individuals engaged in SUD treatment and as home and community-based services (HCBS). These individualized services will support individuals' ability to transition from higher levels of care such as hospital and residential settings to less costly in-home and community-based settings.

Housing supports include services necessary for individuals to obtain and reside in an independent community setting, particularly when transitioning from an SUD IMD to the community. Service categories under the demonstration are:

- Individual housing and pre-tenancy services (e.g., assessing housing situation, creating housing action plan)
- Individual housing and tenancy sustaining services (e.g., creating a housing stabilization plan with goals and approaches to meet goals; referrals to other services and supports as necessary)
- Community transition services (e.g., weekly or bi-weekly in-home sessions to identify, link and ensure receipt of services and resources necessary to support housing stability).

Employment support services are intended to assist individuals in obtaining and maintaining employment in the community. They include:

- Pre-employment services (e.g. workplace assessment, career coaching, job preparation training)
- Employment sustaining services (e.g., job coaching, benefits education and planning, financial and health literacy)

Under this demonstration waiver, CIS are a covered OHP benefit beginning January 1, 2022. Services are reimbursable through open card Fee-For-Service (FFS) as well as through Coordinated Care Organizations (CCOs). Reimbursement rates have been set by OHA in the fee-for-service rate fee schedule. CCOs are required to have a rate setting process and develop reimbursement rates with their network providers. SUD treatment programs providing CIS are required to follow specific criteria to determine eligibility, provide a minimum set of housing and employment services, and hire or contract with housing and employment support specialist(s) based on specified qualifications. Individuals delivering CIS are required to meet specific criteria such as having at least one year of relevant professional experience or training in the field of service.

4. Population Groups Impacted by the Demonstration

The demonstration will include all Oregon Medicaid recipients with a diagnosis of SUD aged 12 and older.

5. Other Relevant Contextual Factors

Over the past 10-15 years Oregon has instituted a number of programs that are aimed at or touch on reducing OUD and other SUD:

- Peer-Delivered Services (2007 – current): including outreach, system navigation, recovery and resiliency promotion, and community building for individuals with BH and their families.
- Block Grant (2014 -Current)- The Mental Health Block Grant and Substance Abuse Prevention and Treatment Grant provides funding for prevention, treatment and recovery support services for individuals who are uninsured or underinsured.
- SAMHSA Medication Assisted Treatment-Prescription Drug and Opioid Addiction program (2016 – 2019): increase treatment access by expanding OTP; expand office based opioid treatment options in rural areas; provide workforce training and consultation for addiction medicine workforce.
- SAMHSA Opioid State Targeted Response (STR) grant (2017 – 2020): programs to reduce prescription drug overdose and problematic prescribing of controlled substances; increase MAT prescribers with necessary waivers; increase number of OTP in rural areas; expand naxolone distribution; enhance recovery support services within the correctional system; partner with Oregon’s Tribes on prevention, treatment, and recovery strategies.
- SAMHSA State Opioid Response grant (2018 – 2022: increase workforce capacity and access to MAT. Building on and expanding STR programs.
- Oregon House Bill 4143 directing the state to implement a pilot project through January 2021, placing peer recovery support mentors in emergency departments.

During the demonstration period, the state is planning to implement a number of other initiatives and programs as part of its larger effort to transform the behavioral health delivery system. For example, the implementation of Ballot Measure 110 is expected to begin concurrently with the SUD waiver and aims to expand availability of harm reduction, SUD treatment and recovery services as well as housing and employment support services and community-based services. Oregon also received approval under the State Plan Amendments to offer targeted case management and crisis intervention services for individuals with SUD, improving parity between mental health and SUD services. Other anticipated State Plan Amendments will cover life skills restoration, early intervention services, and prevention services. Oregon’s SUD waiver application requested authority to expand access to Peer Delivered Services (PDS) to include services received outside an SUD treatment plan and to begin certifying Peer Run Organizations (PROs) as a new provider type. This authority was not included in the demonstration approval, although the state plans to continue to explore options for providing access to these services under OHP.

These recent and on-going activities may impact the demonstration project in various ways, including by creating challenges for providers and CCOs in implementing multiple new programs simultaneously, and difficulties identifying members with SUD who are interested in treatment and not already enrolled in other programs. As discussed in Section D below, they will also limit the Evaluator's ability to determine whether observed changes were due to the 1115 demonstration or to other policy changes.

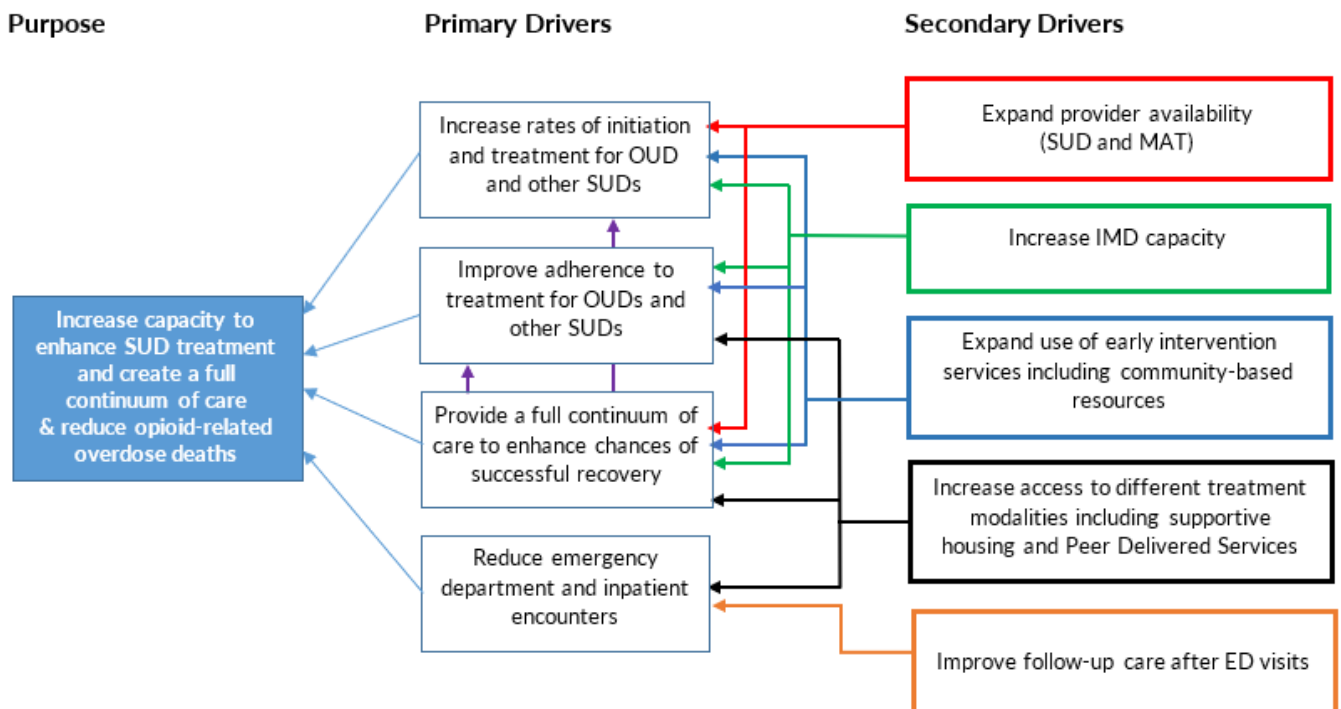
B. Evaluation Questions and Hypotheses

1. Driver Diagram

Figure 1 depicts the relationship between the amendment's overall purpose of reducing opioid related overdose deaths and the primary and secondary drivers that are necessary to achieve this overall goal. Four primary drivers contribute directly towards achieving the SUD amendment's purpose, with four secondary drivers that are necessary to support the primary drivers. As noted in the diagram, several of the primary drivers also affect other primary drivers. For example, providing a full continuum of care may increase rates of initiation and engagement in treatment as well as increasing longer term adherence to treatment.

Secondary drivers also contribute to multiple primary drivers. Expanding provider availability will contribute to providing the full continuum of care as well as increasing initiation of and engagement in treatment

Figure 1: Driver Diagram



2. Evaluation Hypotheses and Measures

Table 1: Evaluation Hypotheses and Measures

Demonstration Goal: Increase rates of identification, initiation, and engagement in treatment for OUD and other SUDs.						
Evaluation Hypothesis 1: The demonstration will increase the percentage of beneficiaries who are referred and engage in treatment for OUD and other SUDs.						
Outcome/Driver	Metric Description	Steward	Numerator	Denominator	Source	Analytic Approach
Outcome	Initiation and engagement of alcohol and other drug dependence treatment	NQF #0004	Initiation: number of Medicaid beneficiaries who began initiation of treatment through an inpatient admission or outpatient visit within 14 days of the index episode start date	Number of Medicaid beneficiaries who were diagnosed with a new episode of alcohol or drug dependency during the first 10 and 1/2 months of the measurement year	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
			Engagement: initiation of treatment and two or more inpatient admissions or outpatient visits with any alcohol or drug diagnosis within 30 days after the date of the initiation encounter			Claims data
Outcome	Medicaid beneficiaries with SUD diagnosis (monthly and annually)*	SUD Monitoring Protocol	Number of beneficiaries who receive MAT or a SUD-related treatment service with an associated SUD diagnosis during the measurement period	N/A	Claims data	Descriptive statistics; Analysis of trend data to examine provider availability post-implementation relative to pre-implementation baseline.
Outcome	Any SUD Treatment*	SUD Monitoring Protocol	Number of Medicaid beneficiaries who used any SUD treatment service, facility claim, or pharmacy claim during the measurement period	Number of Medicaid beneficiaries with SUD in the measurement period	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.

Secondary Driver: Expand use of early intervention services	Early intervention*	SUD Monitoring Protocol	Number of Medicaid beneficiaries who received SBIRT during the measurement period	Number of Medicaid beneficiaries in the measurement period	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
Secondary Driver: Expand provider availability	SUD provider availability*	SUD Monitoring Protocol	The number of providers who billed Medicaid for an SUD service during the measurement period		Claims data; provider enrollment database	Descriptive statistics; Analysis of trend data to examine provider availability post-implementation relative to pre-implementation baseline.
	SUD provider availability - MAT*	SUD Monitoring Protocol	The number of providers who billed Medicaid for MAT during the measurement period		Claims data; provider enrollment database	Descriptive statistics; Analysis of trend data to examine provider availability post-implementation relative to pre-implementation baseline.
Secondary Driver: Increase SUD IMD capacity	Number of SUD IMDs providing treatment for SUD	OHA	The number of IMD facilities enrolled in OHP and providing SUD treatment during the measurement period		State provider enrollment SUD IMD data; claims data	Descriptive statistics; Analysis of trend data to examine the number of SUD IMD/IMD beds available post-implementation relative to pre-implementation baseline.
	Number of beds in SUD IMDs providing treatment for SUD	OHA	The number of beds in SUD IMD facilities enrolled in OHP and providing SUD treatment during the measurement period		State Provider Enrollment SUD IMD data	Descriptive statistics; Analysis of trend data to examine the number of SUD IMD/IMD beds available post-implementation relative to pre-implementation baseline.

Demonstration Goal: Improve adherence to and retention in treatment for OUD and other SUDs.

Evaluation Hypothesis 2: The demonstration will increase the percentage of beneficiaries who adhere to treatment of OUD and SUDs.

Outcome/ Driver	Metric Description	Steward	Numerator	Denominator	Source	Analytic Approach
Outcome	Continuation of pharmacotherapy for OUD*	NQF #3175	Number of adult Medicaid beneficiaries with at least 180 days of continuous pharmacotherapy treatment for OUD	Adult Medicaid beneficiaries with OUD	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
Primary Driver: Increase access to the full continuum of care	Outpatient services*	SUD Monitoring Protocol	Number of Medicaid beneficiaries who used outpatient services for SUD during the measurement period	Number of Medicaid beneficiaries with SUD in the measurement period	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
	Intensive Outpatient and Partial Hospitalization Services*	SUD Monitoring Protocol	Number of beneficiaries who used intensive outpatient and/or partial hospitalization services for SUD (such as specialized outpatient SUD therapy or other clinical services) during the measurement period	Number of Medicaid beneficiaries with SUD in the measurement period	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
	Residential and inpatient services*	SUD Monitoring Protocol	Number of Medicaid beneficiaries who used residential and/or inpatient services for SUD during the measurement period	Number of Medicaid beneficiaries with SUD in the measurement period	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
	Withdrawal management *	SUD Monitoring Protocol	Number of Medicaid beneficiaries who used withdrawal management services during the measurement period	Number of Medicaid beneficiaries with SUD in the measurement period	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to baseline.

	Medicaid beneficiaries treated in an SUD IMD for SUD*	SUD Monitoring Protocol	Number of Medicaid beneficiaries with a claim for residential treatment for SUD in an SUD IMD during the measurement period	Number of Medicaid beneficiaries with SUD in the measurement period	Claims data, State Provider Enrollment SUD IMD data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
	Average Length of Stay in SUD IMDs*	SUD Monitoring Protocol	The average length of stay for beneficiaries discharged from SUD IMD residential treatment for SUD		Claims data, State Provider Enrollment SUD IMD data	Descriptive statistics; Analysis of trend data to examine the average length of stay post-implementation relative to pre-implementation baseline.
	Medication assisted treatment*	SUD Monitoring Protocol	Number of Medicaid beneficiaries who have a claim for MAT for SUD during the measurement period	Number of Medicaid beneficiaries with SUD in the measurement period	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
	Access to preventive/ambulatory health services for adult Medicaid beneficiaries with SUD*	SUD Monitoring Protocol (Adjusted HEDIS)	Number of Medicaid beneficiaries with SUD who had an ambulatory or preventive care visit during the measurement period.	Number of Medicaid beneficiaries with SUD in the measurement period	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
Secondary Driver: Increase access to different treatment/service modalities	Supportive housing services (access & utilization)	OHA	Number of beneficiaries receiving supportive housing services Number of supportive housing service encounters	Number of Medicaid beneficiaries with SUD in the measurement period	Claims data	Descriptive statistics; Analysis of trend data to examine CIS service use post-implementation.
	Supportive employment services (access & utilization)	OHA	Number of beneficiaries receiving supportive employment services Number of supportive employment service encounters	Number of Medicaid beneficiaries with SUD in the measurement period	Claims data	Analysis of trend data to examine CIS service use post-implementation.

	Peer-Delivered Services (PDS)	OHA	Number receiving PDS	Number of beneficiaries with SUD in measurement period	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
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Demonstration Goal: Reduce utilization of emergency department and inpatient hospital settings where the utilization is preventable or medically inappropriate through improved access to other continuum of care services

Evaluation Hypothesis 3: The demonstration will decrease the rate of emergency department and inpatient visits within the beneficiary population for SUD.

Outcome/Driver	Metric Description	Steward	Numerator	Denominator	Source	Analytic Approach
Outcome	Emergency department utilization for SUD per 1,000 Medicaid beneficiaries*	SUD Monitoring Protocol	Total number of emergency department visits for SUD in the measurement period	Per 1,000 Medicaid beneficiaries	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
	Inpatient admissions for SUD per 1,000 Medicaid beneficiaries*	SUD Monitoring Protocol	Total number of inpatient stays for SUD in the measurement period	Per 1,000 Medicaid beneficiaries	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
Secondary Driver: Improved follow-up care after emergency department visits for mental health or alcohol and other drug dependence	Follow-up after emergency department visit for mental illness (7 days, 30 days)*	HEDIS/NCQA	Number of ED visits for mental illness for which the Medicaid beneficiary received follow-up within 7 days of the ED visit	Number of Medicaid beneficiary ED visits for mental illness	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
		HEDIS/NCQA	Number of ED visits for mental illness for which the Medicaid beneficiary received follow-up within 30 days of the ED visit	Number of Medicaid beneficiary ED visits for mental illness	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to baseline.

	Follow-up after emergency department visit for alcohol and other drug abuse or dependence (7 days, 30 days)*	HEDIS/NCQA	Number of ED visits for AOD for which the Medicaid beneficiary received follow-up within 7 days of the ED visit	Number of Medicaid beneficiary ED visits for AOD	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
		HEDIS/NCQA	Number of ED visits for AOD for which the Medicaid beneficiary received follow-up within 30 days of the ED visit	Number of Medicaid beneficiary ED visits for AOD	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
Secondary Driver: Increase access to different treatment/ service modalities	Supportive housing services (access & utilization)	OHA	Number of beneficiaries receiving supportive housing services Number of supportive housing service encounters	Number of beneficiaries with SUD in measurement period	Claims data	Descriptive statistics; Analysis of trend data to examine CIS service use post-implementation.
	Supportive employment services (access & utilization)	OHA	Number of beneficiaries receiving supportive employment services Number of supportive employment service encounters	Number of beneficiaries with SUD in measurement period	Claims data	Descriptive statistics; Analysis of trend data to examine CIS service use post-implementation.
	Peer-Delivered Services (PDS)	OHA	Number receiving PDS	Number of beneficiaries with SUD in measurement period	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.

Demonstration Goal: Provide a continuum of care to increase the chances of Medicaid beneficiaries having a successful recovery program.

Evaluation Hypothesis 4: The demonstration will increase the percentage of beneficiaries with OUD or other SUDs who complete a successful recovery program.

Outcome/Driver	Metric Description	Steward	Numerator	Denominator	Source	Analytic Approach
Outcome	Continuation of pharmacotherapy for OUD*	NQF #3175	Number of adult Medicaid beneficiaries with at least 180 days of continuous pharmacotherapy treatment for OUD	Adult Medicaid beneficiaries with OUD	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
Outcome	Readmissions among beneficiaries with SUD*	SUD Monitoring Protocol	Number of all-cause readmissions during the measurement period among beneficiaries with SUD	Number of Medicaid beneficiaries with SUD in the measurement period	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
Secondary Driver: Expand use of early intervention services	Early intervention *	SUD Monitoring Protocol	Number of Medicaid beneficiaries who received early intervention services during the measurement period	Number of Medicaid beneficiaries in the measurement period	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
Secondary Driver: Expand provider availability	SUD provider availability*	SUD Monitoring Protocol	The number of providers who billed Medicaid for an SUD service during the measurement period		Claims data	Descriptive statistics; Analysis of trend data to examine provider availability post-implementation relative to pre-implementation baseline.
Secondary Driver: Increase access to different treatment/	Supportive housing services (access & utilization)	OHA	Number of beneficiaries receiving supportive housing services Number of supportive housing service encounters	Number of Medicaid beneficiaries with SUD in the measurement period	Claims data	Descriptive statistics; Analysis of trend data to examine CIS service use post-implementation.

service modalities	Supportive employment services (access & utilization)	OHA	Number of beneficiaries receiving supportive employment services Number of supportive employment service encounters	Number of Medicaid beneficiaries with SUD in the measurement period	Claims data	Descriptive statistics; Analysis of trend data to examine CIS service use post-implementation.
	Peer-Delivered Services (PDS)	OHA	Number receiving PDS	Number of beneficiaries with SUD in measurement period,	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
Secondary Driver: Increase SUD IMD capacity	Number of SUD IMDs providing treatment for SUD	OHA	The number of SUD IMD facilities enrolled in OHP and providing SUD treatment during the measurement period		State Provider Enrollment SUD IMD data; Claims data	Descriptive statistics; Analysis of trend data to examine the number of SUD IMD/IMD beds available post-implementation relative to pre-implementation baseline.
	Number of beds in SUD IMDs providing treatment for SUD	OHA	The number of beds in SUD IMD facilities enrolled in OHP and providing SUD treatment during the measurement period		State Provider Enrollment SUD IMD data	Descriptive statistics; Analysis of trend data to examine the number of SUD IMD/IMD beds available post-implementation relative to pre-implementation baseline.

Demonstration Goal: Reduce overdose deaths, particularly those due to opioids.

Evaluation Hypothesis 5: The demonstration will decrease the rate of overdose deaths due to opioids.

Outcome/Driver	Metric Description	Steward	Numerator	Denominator	Source	Analytic Approach
Outcome	Use of opioids at high dosage in persons without cancer*	SUD Monitoring Protocol	Number of Medicaid beneficiaries with ≥90mg morphine equivalent dosage in the quarter	Number of Medicaid beneficiaries with a ≥60 days supply of opioids in the calendar quarter	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
	Concurrent use of opioids and benzodiazepines*	SUD Monitoring Protocol	Number of Medicaid beneficiaries with ≥60 days supply of opioids and prescribed ≥60 days supply of sedatives in the quarter	Number of Medicaid beneficiaries with a ≥60 days supply of opioids in the calendar quarter	Claims data	Descriptive statistics; Modified pre-post regression analysis comparing person-quarter outcomes post-implementation relative to pre-implementation baseline.
	Count of overdose deaths due to any opioid*	SUD Monitoring Protocol	Number of overdose deaths during the measurement period.		State death data	Descriptive statistics, including breakdown by county and type of drug.
	Rate of overdose deaths due to any opioid*	SUD Monitoring Protocol	Number of overdose deaths during the measurement period.	Number Oregon residents in the measurement period	State death data	Descriptive statistics, including breakdown by county and type of drug.

In addition to the above questions, this evaluation will also examine the impact of the SUD amendment on total expenditures and expenditures for SUD-related services. See Quantitative Methods section for more details.

* Denotes metric reported in the SUD Monitoring Protocol

C. Methodology

1. Evaluation Design Summary

The focus of the evaluation will be primarily quantitative, using data from multiple sources, as detailed below. However, the evaluation will also include qualitative interviews and focus groups, with the purpose of identifying the demonstration programs and interventions that were most effective in driving improvements.

2. Target and Comparison Populations

The primary focus of our evaluation is individuals aged 12 and older enrolled in Medicaid with a substance use disorder (SUD). We will also conduct subanalyses on the following subpopulation categories:

- Age groups (children <18; adults 18-64).
- Dual-eligible status (dually eligible for Medicare and Medicaid; not dually eligible).
- Pregnancy status (pregnant; not pregnant).
- Opioid use disorder (opioid use disorder diagnosis, other SUD diagnosis).
- Geography of residence (urban; rural; isolated).
- Race/ethnicity (if adequate data are available)
- Individuals enrolled 9 or 11 months during the preceding year;
- Individuals enrolled on employment and housing services

Analyses of these populations will provide an assessment of how utilization of specific treatment services has changed with expanded access to SUD IMD facilities and the initiative of new programs for supportive housing and other community-based services. The geographic analysis will specifically assess whether there was unequal implementation of the demonstration across regions in Oregon.

In addition to this primary analysis, we will also assess changes in the prevalence of SUD and opioid use disorder (OUD) in the broader population. These analyses will provide a more nuanced understanding of trends in the state. For example, if the prevalence of SUD was increasing during the study period, increased access to treatment might be observed in the broader population (with more people in the state receiving treatment), even if treatment rates among individuals with SUD did not increase. This finding would demonstrate, for example, that increased access might have allowed the state to keep pace with increasing SUD prevalence, but greater capacity or changes to the delivery system might be warranted to ensure that a greater proportion of individuals with SUD received recommended treatment.

Our analyses will also include comparison populations drawn from other states that have not implemented 1115 SUD waivers. We describe these comparison groups and our use of nationally available Medicaid claims data in greater detail below.

3. Evaluation Period

The demonstration period began on April 8th, 2021, and concludes on March 31, 2026. The final evaluation report is due 18 months later, on September 31, 2027. The year leading up to the demonstration period and the first year of the demonstration coincided with the COVID-19 Public Health Emergency (PHE). We propose to use 2017-2019 data to serve as pre-policy and pre-COVID-19 baseline data. We denote the years 2020-2021 as “PHE period.” This time period encompasses the onset of the COVID-19 pandemic, which significantly changed health care utilization across most services, as well as the initial implementation and ramp-up of the waiver demonstration, beginning in April 2021 and extending through December 2021. We will define the “post-policy” period as 2022-2025.

Our statistical analyses will primarily focus on changes between the “pre-policy” period of 2017-2019 and the “post-policy” period of 2022-2025. We will assess changes during the PHE years (2020 and 2021) by visually displaying changes in key outcomes and, when appropriate, by including results from the 2020/2021 period. We will use qualitative analyses to understand how patients and the health care system responded to the PHE (described in more detail below). Our choice of final models will be partly dependent obtaining a greater understanding of how the pandemic changed patterns of utilization.

Our analytic plan includes data through December 31, 2025. Assuming a 9 month lag in the receipt of Medicaid data from the state, we would anticipate receipt of the final data in September 2026, allowing us to conduct data management, analysis, and writing to include in the draft Summative Evaluation report to the state in July 2027. We note that some data sources, including data on the dual eligible population, extracted from the state’s All Payer All Claims Database, may have a longer lag period. In this case, analyses of these populations may include an abbreviated post-period (e.g., data through June 30, 2025.)

4. Data Sources and Preparation

The quantitative portion of the evaluation will include member-level Medicaid data (claims, enrollment, and pharmacy data) from OHA’s Health Systems Division (HSD), information on opioid overdose deaths from state death data, and data on SUD IMDs collected by OHA. To calculate outcomes for dual-eligible beneficiaries, the evaluation will also use Medicare claims data from Oregon’s All Payer All Claims (APAC) database. Further, we will use claims data from the Medicaid Management Information System (MMIS) and Measures and Outcomes Tracking System (MOTS) for evaluation of the employment and housing initiatives. MMIS provides eligibility, claims status and prior authorization status. MOTS data is used by Oregon’s behavioral health service providers to support improved care, controlled costs, and sharing information.

To create comparison groups, our analyses will also include Transformed Medicaid Statistical Information System (T-MSIS) Analytic Files (TAF) dataset, a newly developed, national Medicaid claims data source that includes all states starting 2016, in addition to many states who began to submit data as early as 2014. The Evaluator has acquired 2014-2018 TAF data and is in the process of making these data available for research; they will obtain data through 2020 through other grant

funding. Currently, TAF data comes with a 2-3 year lag, which implies that years up to 2023 could be used for the summative evaluation report.

The Evaluator has worked with Oregon Medicaid data for more than 10 years and has a well-established process in place for secure file transfer, data staging, and quality metric calculation. Similar processes will be established for data associated with this demonstration that are not already in the Evaluator's database.

The qualitative portion of the evaluation will require the collection of data from stakeholders through stakeholder engagement activities and key informant interviews. Methodology for the qualitative portion of the evaluation is described in Section 6 below.

5. Quantitative Methods

Our quantitative methods for our main analysis include 3 complementary approaches. Our first approach focuses on changes over time, using 2017-2019 as a pre-policy period, 2020-2021 as an interim period that accounts for the COVID-19 PHE, and 2022-2025 as a post-policy period. The focus of this analysis will be a pre-post approach. A second approach – an interrupted time-series model – will include time-trends and assess changes that deviate from those trends. These first two approaches will be conducted for all of our outcomes and include data from 2017 through 2025.

A third approach will include comparison states, using nationally available Medicaid claims data, described below. These analyses will focus on data from 2017 through 2023. Outcomes will be restricted to those that can be developed from claims. These comparison states will allow for a difference-in-differences model, comparing changes in Oregon to changes in states that do not implement an 1115 SUD waiver. The inclusion of other states will provide a more robust analysis of Oregon's demonstration. We will use these three approaches – pre-post, interrupted time series, and difference-in-differences – to assess the overall impacts of Oregon's 1115 SUD waiver. We will also consider using a distinct difference-in-differences approach that examines outcomes before and after eligibility for the analysis of the subpopulation of individuals receiving employment and housing services; we will describe this approach in detail further below.

Quantitative Analysis Plan

Prior to beginning the processes described above of creating the analytic database, the Evaluator will propose a detailed Quantitative Analysis plan, which will include specifics regarding:

- **Measure specifications:** Precise definitions for all measures to be used for the evaluation, as specified by the organization that defined the measure (e.g., NCQA HEDIS, AHRQ PQIs). Metrics will be updated annually using updated specifications from CMS.
- **Medicaid population and subgroup definitions:** Criteria that will be used to identify all populations and subgroups for whom measures will be reported (e.g., Medicaid eligibility codes, continuous enrollment criteria, and diagnosis or procedure codes that will be used to identify members with specific conditions).
- **Statistical models:** Statistical models that will be used to estimate change in outcomes associated with the demonstration, including functional form, control variables, and baseline periods. A general model is discussed below, and detailed models will be included in the quantitative analysis plan.
- **Steps to address other methodological challenges:** The Evaluation Design, Section D lists potential challenges with evaluating the waiver's effects, including Medicaid members who "churn" between Medicaid and other coverage (or no coverage), unequal penetration of waiver reforms in different geographic regions, and state or national policy changes occurring at the same time as the waiver. The quantitative analysis plan will describe how such challenges may affect results and any steps planned to address such challenges.

Outcome Metrics

Outcome metrics will be drawn primarily from the CMS-required SUD Monitoring Protocol reporting. The final list of metrics may change based on CMS approval of the Monitoring Protocol and may be modified if better performance measurement tools become available in the evaluation window.

Member-Level Outcomes

The Evaluator will calculate values for each proposed measure using data from the analytic database. Standard metrics from HEDIS or NCQA will be used whenever possible, and published definitions from the metric stewards will be used to create the metrics. Measures with binary outcomes—for example, whether or not the member received any services from any SUD IMD—will be calculated by determining who was eligible for the measure based on the published definition (the denominator) and then calculating whether eligible members met the criteria for the measure within a given timeframe (the numerator). Measures with non-binary outcomes—for example, the number of visits of a specific type—will be calculated by determining who was eligible for the measure (the denominator) and calculating a total for each eligible member (the numerator). A value is calculated for each individual for each calendar quarter, so that measures will be available at the person/quarter level. Results will be aggregated to calculate outcome measures for Medicaid members as a whole and for specific subgroups of Medicaid members. See Section E for a complete list of data elements.

System Capacity Outcomes

Three secondary drivers focus on system capacity outcomes: (1) expanding provider availability, (2) maintaining SUD IMD capacity, and (3) increasing access to different treatment/services modalities.

Each of these outcomes will be analyzed for evidence of trends over time throughout the demonstration period, at either the provider, clinic, or program level, depending on what is applicable for a particular research question and contingent on data availability. The analytic approach to each of these secondary drivers is slightly different from the Medicaid beneficiary-focused analyses described above, although it retains the mechanics of the pre-post analysis, comparing post-implementation outcomes relative to a pre-implementation baseline. However, the analysis will focus on state-wide and regional trends rather than person-quarter outcomes. We will report on the number of facilities that accept Medicaid and offer SUD treatment services, as well as the number of beneficiaries with SUD receiving supportive housing and employment services, throughout the demonstration period. Each secondary driver is examined below.

- **Expand Provider Availability.** There are two metrics associated with this secondary driver: SUD provider availability broadly and SUD provider availability specific to MAT. This analysis will focus on the providers who are actively providing SUD treatment services to Medicaid clients, identified using claim data. Descriptive statistics and an analysis of the number of providers post-implementation relative to pre-implementation baseline will demonstrate how provider availability has changed due to the implementation of the SUD demonstration.
- **Increase SUD IMD Capacity.** There are two metrics associated with this secondary driver: number of SUD IMDs enrolled in OHP and providing treatment for SUD and the number of beds in SUD IMDs enrolled in OHP and providing treatment for SUD. This information will be obtained from the state's SUD IMD licensing data, Provider Enrollment data and from

provider specialty information in claims. Descriptive statistics and an analysis of trend data to examine the number of SUD IMDs and SUD IMD beds available post-implementation relative to pre-implementation baseline will demonstrate how the use of SUD IMDs have shifted due to the implementation of this demonstration. Depending on data availability, the number of SUD inpatient/residential treatment facilities and the number of beds in those facilities may provide a useful reference metric.

- **Increase Access to Different Treatment/Service Modalities.** The metrics associated with this secondary driver are supportive housing, supportive employment, and Peer Delivered Services (PDS). Analyses of these programs will focus on access and utilization outcomes, including the number of beneficiaries receiving services, based on claims.

Statistical Models

As noted above, we will conduct three complementary analyses: a pre-post analysis, an interrupted time series analysis, and a difference-in-difference analysis. The pre-post approach is the least restrictive in the assumptions underlying the model, but it can be difficult to distinguish between secular trends and changes arising from the policy. The difference-in-difference model is a more robust approach. However, we will only be able to conduct these analyses through 2023, due to limitations in data availability. The interrupted time series analyses lies in between the pre-post and difference-in-difference analyses, accounting for some changes over time, but subject to bias when trends are not linear. Together, these three approaches will provide a robust assessment of the impacts of the policy.

The analytic and modeling approaches described below are appropriate for outcomes that measure member-level outcomes (e.g., ED use, SUD IMD use and length of stay). In most analyses we propose to assess changes in the 12 quarters of pre-period data (January 2017 through December 2019) and up to 16 quarters following the amendment approval (January 2022 through December 2025). Our unit of analysis will be the person-quarter. We use the following specification to look at the overall effects of the demonstration:

$$Y_{it} = \beta_0 + \sum_{t=1}^8 \beta_t^{PHE} I_t + \sum_{t=1}^{16} \beta_t^{POST} I_t + \tau_Q + \theta X_{it} + e_{it} \quad (1)$$

where Y_{it} is the outcome of interest for individual i in quarter t ; I_t represents 1 of 16 year-quarters that occur in the demonstration implementation period (January 2022 through June 2025); τ_Q represents dummy variables for quarters (e.g., Q2, Q3, Q4, with Q1 as a reference); X_{it} is a vector of demographic covariates and risk adjusters; and e_{it} is a random error term associated with the unmeasured variation in the outcome of interest. In this model, the period January 2017 – December 2019 serves as a baseline. We estimate changes relative to this baseline, focusing on two sets of coefficients of interest. The coefficients $\beta_1^{PHE}, \beta_8^{PHE}$ capture the change from baseline through the PHE, whereas the coefficients $\beta_1^{POST}, \beta_{16}^{POST}$ capture changes occurring in each of the 16 quarters following the expansion of SUD IMD services, net of other observable factors.

Equation (1) is a “pre-post” study design. We will also test an alternative approach could be to impose linear trends using an “Interrupted Time Series” (ITS) analysis. The ITS model takes the following form:

$$Y_{it} = \beta_0 + \beta_1 T_t + \beta_2 Post_t + \beta_3 Post_t * T_t + \theta X_{it} + e_{it} \quad (2)$$

Where T_t is a linear time trend, taking a value of 0 for the first quarter of 2017, 1 for the second quarter of 2017, 11 for the last quarter of 2019, 12 for the first quarter of 2022, and 27 for the last quarter of 2025 (the PHE periods are held out in this model.) The variable $Post_t$ takes a value of 1 beginning and following the first quarter of 2022, and 0 for time periods prior to the policy intervention. The ITS method can be helpful in estimating treatment effects in the presence of a stable, long-term trend. However, we anticipate that SUD measures may have been fluctuating prior to the 2021 policy change. In this case, results from the ITS method could be highly sensitive to the length of the pre-policy window. Thus, our primary assessment will not impose this restriction. We will test the sensitivity of our results through different assessments. First, we will test our results of the pre-post model against the ITS model. Second, we will assess all outcomes visually in order to ensure that our primary findings are not driven by unusual fluctuations or outlier events. We will include results from the ITS analysis provided that its results are not sensitive to different modelling choices. Finally, we will compare these results to the difference-in-difference approach described below.

As a third alternative modeling approach, we use the TAF data to identify a suitable comparison groups of Medicaid beneficiaries enrolled in other states and to conduct a difference-in-differences analysis. Comparison states will include states that do not implement a SUD waiver during the study period. If possible, we will further select states that are geographically located in the western part of the United States and that have similar geographic and demographic characteristics as Oregon. Potential comparison states might include Colorado, Iowa, Alaska or Montana. We will compare pre-intervention outcome trends of potential comparison states to pre-intervention outcome trends for Oregon to guide our selection of comparison states.

The difference-in-difference approach is modeled according to the following equation:

$$Y_{it} = \beta_0 + \beta_1 Oregon_i + \beta_2 PHE_t + \beta_3 Post_t + \beta_4 Oregon_i * PHE_t + \beta_5 Oregon_i * Post_t + \theta X_{it} + e_{it} \quad (3)$$

In this equation, the variable $Oregon_i$ take a value of 1 if the beneficiary is in Oregon and 0 if the beneficiary is in another state. The variable PHE_t takes a value of 1 during 2020 and 2021, and 0 otherwise, while the variable $Post_t$ takes a value of 1 for all periods in 2022 and later, and zero otherwise. The coefficients of interest are β_4 – which captures relative differences between Oregon and comparative states during the PHE – and β_5 , which captures relative differences between Oregon and comparative states in the post-policy, post-PHE period. Differences-in-differences models require parallel trends, i.e., hypothetical changes in outcomes of individuals in Oregon have

to be identical to changes in outcomes of individuals in comparison states if Oregon had not implemented the waiver. While this assumption cannot be directly tested, we can assess whether there are parallel trends for the baseline period. We will consider trend adjustment if there is evidence of non-parallel trends.

The difference-in-difference approach can be used to distinguish between trends over time that are common to all states, and differential trends in Oregon due to implementation of the SUD-IMD waiver. Thus, this approach might be able to isolate the effects of the COVID-19 pandemic from waiver implementation effects. However, a limitation of this analysis is that it is restricted to outcomes that can be identified through TAF claims. Thus, outcome measures that use non-Medicaid claims such as receiving supportive housing services, SUD provider availability and IMD capacity are not included in this analysis (see Table 6 for details).

For all analyses, we will choose the regression model – e.g., linear regression, logistic regression, generalized linear model – that is most suitable for the distribution of the outcome variable *Y*. In general, we prefer linear models, which generally outperform other statistical models in estimating population averages for large *N* studies, and offer the additional advantages of generating coefficients that are straightforward to interpret. We note that the distribution of health expenditures is typically right skewed with a heavy mass at zero (see Cost Analyses section below for detailed description of planned cost analyses). The study team has experience in two-part models and will test the relative performance of these approaches relative to an OLS approach. In our past work, we have found that, in large *N* studies, OLS has produced estimates that are similar to those produced by two-part models.

Key Covariates

At a minimum, we propose to adjust for age, gender, race/ethnicity (if data are of sufficient quality), tribal membership (yes/no), urban/rural/isolated residence, Chronic Illness and Disability Payment System (CDPS) risk indicators, SUD-induced mental health disorders, language spoken at home (English or other language), disability status (disabled/not disabled), participation in CIS programs (housing, employment, or both), and CCO in which the beneficiary is enrolled.

Subgroup Analyses

To assess whether pre-post changes differed among subgroups of Medicaid beneficiaries with SUD, we will run regression models separately for subgroups based on age, pregnancy status (pregnant/not pregnant), dual-eligible status, type of SUD (OUD/other), geography of residence (urban/rural/isolated), and race/ethnicity (if data are of sufficient quality).

Cost Analyses

A key component of the evaluation will focus on understanding how the change in FFP bends the cost curve and affects utilization trends for the population we expect to be impacted by the amendment – Medicaid beneficiaries with SUD. The intended methodologic approach and potential data issues are detailed below.

Methodological Approach

Given that the state's waiver will be implemented across the entire state at the same time, there is no geography-based comparison population available. However, for this cost analyses it is possible to use a comparison group design to examine a subset of costs, comparing expenditures for beneficiaries with SUD to those without SUD (a type of "difference-in-differences" analysis). This approach helps control for common confounding factors affecting changes in expenditures across all Medicaid beneficiaries, such as secular trends in service utilization or changes in reimbursement rates. (It also has some limitations: we cannot, for example, use this approach to measure changes in SUD-related costs, because, by definition individuals without SUD do not have SUD-related expenditures.)

To estimate changes in subsets of costs that exclude SUD services, we will use the following model:

$$Y_{iq} = \beta_0 + \beta_1 SUD_i + \beta_2 PHE_q + \beta_3 Post_q + \beta_4 SUD_i \cdot PHE_q + \beta_5 SUD_i \cdot Post_q + \tau_Q + \theta X_{it} + e_{it} \quad (4)$$

where i denotes individual and q quarter. Y_{iq} is the spending measure under consideration, SUD_i is an indicator for Medicaid beneficiaries with SUD, PHE_q is an indicator equal to 1 for the years 2020 and 2021, $Post_q$ is an indicator for the post-implementation period, and the other elements are interpreted as above: τ_Q represents dummy variables for quarters; X_{it} is a vector of demographic covariates and risk adjusters; and e_{it} is a random error term associated with the unmeasured variation in the outcome of interest. The coefficient of interest is β_4 , the interaction between the post-period and SUD status. We will use the same covariates as those listed above, for non-spending measures. These estimates will include individuals with and without SUD.

Cost Measurement

Following CMS guidance, cost measures will explore spending at three levels of aggregation:

1. Total costs per member per month (PMPM)
2. Costs related to diagnosis and treatment of SUD
3. Sources of treatment cost drivers

Table 2 lists proposed cost measures, definitions, and data sources.

We will calculate all measures as spending on services per member per month (PMPM). For an individual member, spending PMPM will be calculated as total spending on services in a year divided by the number of months the member was enrolled in the year.

Our analyses of health expenditure data will include a number of additional adjustments. To address medical encounter claims where the "amount allowed" was listed as zero, we will impute spending by taking the annual mean value for non-zero payments across six categories of spending: inpatient, emergency department, outpatient, professional, pharmacy, and other. We will further calculate mean values separately for each Current Procedural Terminology (CPT) code or Diagnosis Related Group (DRG). We refer to these imputed claims as "repriced" claims.

Repriced spending measures allow for a feasible cost analysis, although it does create some limitations. These spending measures reflect changes in spending that would have occurred if all services were priced at the same level. These spending measures would also exclude spending by CCOs or the State through non-claims-based payment systems, including incentive payments from CCOs to health care providers for achieving quality goals, and spending on non-billable health-related services, such as individual or community-level flexible services.

Table 2: Cost Measures

Measure of Cost	Description	Data Source
ED Spending PMPM	Spending on Emergency Department Visits, defined as visits with CPT codes 99281-99285; UB revenue codes 0450, 0451, 0452, 0456, 0459, or 0981; or a 'place of service code' of 23 combined with a qualifying CPT code (from NCQA HEDIS definition)	Medical claims
Other Outpatient (non-ED) Visit Spending PMPM	Spending on outpatient visits that do not occur in the ED, including primary care visits and same-day discharges from an inpatient facility. Excludes behavioral health visits	Medical claims
Inpatient Spending PMPM	Spending on inpatient visits defined as visits with 'type of bill' beginning 11 or 12; 'place of service' codes 21 or 51; or 'claim type' of A (inpatient crossover) or I (inpatient). Includes inpatient facility and professional spending, and excludes behavioral health	Medical claims
Prescription Drug (Rx) Spending PMPM	Spending on prescription drugs using "allowed amount" from prescription drug claims	Prescription drug claims
Behavioral Health Spending PMPM	Spending on outpatient and inpatient behavioral health services	Medical claims
Total Spending PMPM	ED+Other Outpatient+Inpatient+Rx+Behavioral Health	Medical and prescription drug claims
SUD IMD Spending PMPM	Spending on SUD IMD services with an SUD diagnosis and/or procedure code	Medical claims; state SUD IMD data
SUD Non-SUD IMD Spending PMPM	Total spending with an SUD diagnosis and/or procedure code, excluding SUD IMD services.	Medical and prescription drug claims; state SUD IMD data
Non-SUD Spending PMPM	Total spending without an SUD diagnosis and/or procedure code	Medical and Rx claims

We will use the following steps to calculate spending on specific measures:

- **Primary Care, Emergency Department, and Other Outpatient Spending PMPM:** We use repriced medical claims to determine PMPM spending.
- **Inpatient Facility Spending PMPM:** We will calculate inpatient spending on the basis of DRG payments.
- **Inpatient Professional Spending PMPM:** We will use repriced medical claims to determine PMPM spending. We will exclude behavioral health claims, which are reported separately.

- **Prescription Drug Spending PMPM:** We will use pharmacy claims to determine PMPM spending. We will exclude drugs on a list of mental health prescription drugs provided by OHA, as these drugs were carved out of CCOs' global budgets and paid for on a fee-for-service basis. **We will base prescription drug spending on allowed amounts as they appear on pharmacy claims.** We will use "allowed amount" rather than "paid amount" because an evaluation of Oregon Medicaid pharmacy data suggested paid amounts for non-carveout drugs were vastly underreported.
- **Behavioral Health Spending PMPM:** We will identify behavioral health claims using definitions of behavioral health services from two prior studies of behavioral health care coverage and used repriced behavioral health claims to determine PMPM spending. Outpatient BH spending will be calculated from claims that include a BH code. SUD IMD spending will be calculated as the number of nights spent in the hospital multiplied by the a daily rate, to be determined in consultation with the Oregon Health Authority.
- **Total Spending PMPM:** Total spending will be calculated as the sum of all spending categories listed above.

To identify costs for services provided at SUD IMD facilities, we expect to use state licensing data on SUD IMDs and work with OHA to develop a methodology for identifying SUD IMD facilities in claims.

Federal Medical Assistance Percentage (FMAP) rates for managed care vary by Medicaid member according to certain eligibility characteristics (e.g., pregnancy). To calculate total federal costs, we will work with OHA to categorize members by Medicaid Eligibility Group (MEG) and use this classification to approximate the federal match rate at the member level.

We propose to exclude administrative costs associated with the demonstration from our measure of total spending. These data are not available in claims, and any analysis of administrative costs would require extensive consultation with the state and other stakeholders, which would be prohibitively time-consuming.

Analysis of employment and housing services

Our analysis of the CIS component of the waiver will follow the same approach described above, focusing on the subpopulation of individuals receiving employment or housing services. We anticipate that will not be able to use TAF data for this analysis because we likely will not be able to identify a suitable comparison group (i.e., individuals residing in comparison states who would have received CIS services had they lived in Oregon). However, we will consider estimating an alternative difference-in-differences approach that compares outcomes before and after becoming eligible for CIS.

Specifically, the alternative difference-in-differences approach uses the following model:

$$Y_{i\tau} = \beta_0 + \beta_1 CIS_i + \beta_2 Post_\tau + \beta_3 CIS_i \cdot Post_\tau + \theta X_{i\tau} + e_{i\tau} \quad (5)$$

where i denotes individual and τ quarter relative to CIS eligibility, $Y_{i\tau}$ are outcome measures, CIS_i is an indicator for Medicaid beneficiaries receiving CIS services (i.e., the treatment group), $Post_\tau$ is an indicator for the post-eligibility period, $X_{i\tau}$ are demographic characteristics and risk adjusters, and $e_{i\tau}$

is the random error term. The coefficient of interest is β_3 , the interaction between the post-eligibility period and being a CIS recipient. This approach requires identification of a suitable comparison group, such as individuals matched to CIS recipients on demographic characteristics. Implementation of this approach also depends on claims information to identify the date of eligibility for CIS recipients. We will determine availability of such data and feasibility of this approach at the beginning of the evaluation period.

6. Qualitative Methods

Qualitative analysis will provide an early snapshot of successes and challenges to help inform the state's implementation of CIS and generate lessons learned from the demonstration. These findings will also help to provide context for quantitative results, including why the demonstration and its component projects did or did not achieve the expected effects. Two rounds of qualitative interviews are planned. The first will take place between November 2022 and May 2023 with findings presented in the Mid-Point Assessment and Interim Reports. The focus of the first round of interviews will be to assess early implementation successes and barriers and progress toward achievement of demonstration milestones. The second round of qualitative interviews will take place between July 2025 and January 2026 and will focus on overall successes, challenges, and potential changes needed. This information will be used in the Summative Report.

An important component of the qualitative work to account for the effects of the COVID-19 PHE. We anticipate that the PHE had multiple effects on the patient population, providers, and the overall implementation of efforts connect to this demonstration waiver. Qualitative data will provide context around changing patterns and trends in outcomes during the PHE period.

Interviews will be conducted with "key informant" representatives from the state, the CIS program, CCOs and/or provider organizations to understand implementation experiences from multiple organizational and professional perspectives. A sampling frame will be developed through consultation with OHA staff to ensure similarity or variation on interviewee characteristics of interest. Interviews will be conducted by a member of the research team, recorded, and transcribed. Transcripts will be analyzed using *a priori* coding analyzed in qualitative analysis software such as ATLAS.ti. The research team will review data, compare results within and across dimensions from the sampling frame, and develop key findings.

The Mid-Point Assessment will also include engagement with key stakeholders including SUD treatment providers, CCO representatives, and beneficiaries. The purpose of stakeholder engagement activities will be to solicit input on the design, planning and conduction of the Mid-Point Assessment, as well as the anticipated impact of the waiver on each of these groups. Activities may include hosting a discussion group at an SUD provider conference and/or participation in meetings of CCO representatives hosted by OHA. OHA will provide assistance with identifying suitable venues, inviting participants, and coordinating logistics, as needed. These activities will occur between September and November 2022. Stakeholder input will be incorporated into the design of key informant interviews and inform the evaluation team's assessment of progress on meeting milestones in the state's SUD Implementation Plan.

Additionally, the evaluation team will perform qualitative analysis of program and policy documents collected systematically from state agencies, CCOs and other relevant stakeholders (spanning periods of program planning, design, and implementation) to identify themes related to program design, implementation and operations. Key constructs of interest at different phases and levels of analysis (e.g., state, organizational, and provider) will be iteratively identified through review of documents and discussion with OHA staff. Documents will be catalogued and reviewed for relevant text by the research team to develop a matrix of preliminary findings. This matrix will be further analyzed within and across categories to develop and refine key findings. For the Mid-Point Assessment, the evaluation team will review program and policy documents and consult with OHA staff to assess completion of actions outlined in the state's SUD Implementation Plan.

Qualitative analysis will address questions such as:

- What strategies appear to be successful in enrolling clients in SUD treatment? What are the barriers?
- How are SUD IMDs being used? Are they effective? What changes are needed?
- What organizational or contextual factors contribute to readiness of the state, CCOs and providers to implement the new SUD IMD and CIS programs?
- What do providers perceive as barriers to successful SUD treatment?
- What challenges arise related to designing and implementing the IMD/SUD and CIS programs? How do these challenges affect progress with IMD/SUD and CIS implementation?
- Is there variability in attributes of IMD/SUD and CIS program design, provider recruitment, client enrollment strategies, or other aspects of implementation across CCOs or geographic regions, and if so, what are the dimensions of this variation?
- What strategies do stakeholders employ to prevent or overcome challenges, and to what extent do these strategies appear to be effective?
- How has COVID-19 PHE changed the volume of services, composition of services, and ability to provide care to patients?
- What was the impact of COVID-19 PHE on financial stability of health care organizations?
- What other policy changes occurred in Oregon at the time of the demonstration? In what ways did these policies have overlapping, aligned, or conflicting effects?

Synthesis of the qualitative and quantitative analyses will support the effective translation of evaluation data and results, reinforcing quantitative findings in a non-technical format (e.g., through key-informant quotes in addition to measures) and helping to open the “black box” of program effects with supporting contextual information.

The appropriate design and execution of qualitative methods supporting the evaluation will ultimately depend on the State of Oregon's stage of implementation in late 2025 when the second round of key informant interviews will occur. Finalizing key elements of qualitative data collection

and analysis will be the responsibility of the independent external evaluator. This responsibility will include: defining the number of key informant interviews; determining the universes and/or sample frames from which participants will be selected; determining when and how interviews will be conducted; aligning data collection instruments to specific research questions and hypotheses; and designing the specific data collection and analysis instruments.

7. Evaluation Reports

The Evaluator will deliver Mid-Point Assessment, Interim and Summative Evaluation Reports that are meaningful and accessible to the primary audiences for the evaluation. Given the six-month time lag for maturation of claims/encounters data and the time needed to analyze these data, we anticipate that the reports will cover quantitative results for the following time periods:

- The Mid-Point Assessment Report due to CMS in December 2023 will include results through June 2022.
- The Interim Report due to CMS in July 2025 will include results through December 2023
- The Summative Report due to CMS in September 2027 will present results through December 2025.

We anticipate that each report will contain a large volume of quantitative results, including descriptive statistics, data trends over time, change associated with the waiver as identified by regression analysis, and results for subgroups. The reports will use visual presentations to convey this information quickly and concisely and enable readers to explore the data. To provide context and help explain results, the reports will draw on information from Oregon's quarterly monitoring reports to CMS and other background documents as needed.

8. Support Tasks

The Evaluator will carry out the following tasks to support the quantitative and qualitative evaluations and deliver Interim and Summative Evaluation Reports:

- Facilitate kickoff meeting and regular meetings with state staff: The Evaluator will facilitate a kickoff meeting with the Oregon Health Authority to introduce the evaluation team and clarify scope as needed. In addition, the Evaluator will facilitate regular check-ins with the division to provide progress updates and address any challenges with the evaluation.
- Manage research compliance: The Evaluator will obtain necessary permissions to collect and use data needed for the evaluation. This includes obtaining IRB approval for the evaluation protocol and executing any data use agreements needed to obtain and use the data.
- Provide project management: The Evaluator will provide general project management to ensure deliverables are high-quality and delivered on time.

D. Methodological Limitations

This evaluation will have a number of limitations. First, the absence of a comparison group for a number of the outcomes limits the ability to absolutely determine whether the demonstration caused the observed changes in outcomes and to assess what the outcomes would have been in the absence of the demonstration. However, the analytic strategy described above is a strong method for evaluating drivers of change in the absence of a comparison group or for identifying changes specific to the population of interest (people with SUD in Oregon) in the presence of a comparison group.

Second, Medicaid members often “churn” between Medicaid and other coverage (or no coverage), which can make it difficult to follow individual over time and assess trends. To address this concern, we will conduct sensitivity analyses for the subpopulation of Medicaid beneficiaries enrolled 9 or 11 months during the preceding 12 months.

Third, unequal penetration of waiver reforms in different geographic regions could lead to limitations. Oregon is characterized by concentrated population centers in the western part of the state, with the rest of the state characterized by low or very low population density. This makes implementing reforms in a uniform way across the state very difficult. The realities of population scatter may require modifications of planned reforms in some areas. To address this concern, we will conduct subpopulation analysis by geographic location. Such analyses will shed light on whether the waiver was uniformly implemented across regions in Oregon, or whether specific regions benefitted more from the waiver than other regions.

Fourth, Oregon has implemented a number of other SUD-related programs over the past 5 years, which may confound efforts in the current demonstration. In addition, other state or national policy changes may occur at the same time as the waiver. This could limit the ability of the Evaluator to determine whether observed changes were due to the 1115 demonstration or to other policy changes. The evaluation will include an assessment of ways in which SUD-related policy changes and targeted interventions unrelated to the waiver may have affected outcomes. We will consider potential statistical techniques to account for such confounding factors. In general, however, distinguishing between these different policies would require strong and often implausible model assumption. We will leverage our qualitative analysis to shed light on the potential role of other initiatives in facilitating waiver implementation.

Fifth, as noted earlier, the year preceding the demonstration period and the first year of the demonstration overlap with the COVID-19 PHE. The PHE had profound effects on OHP members and the Medicaid behavioral health delivery system, for example, by exacerbating mental health conditions and substance use, limiting access to and capacity for in-person care, and creating financial hardship for many behavioral health providers. Oregon saw the closure of some residential SUD providers during the pandemic. We will leverage our qualitative analysis to better understand how CCOs and provider organizations adapted during the COVID-19 PHE. Our quantitative analyses are also aimed at differentiating between the PHE period and post-PHE period.

E. Additional Information/Attachments

1. Independent Evaluator Selection Process

The Center for Health Systems Effectiveness (CHSE) at Oregon Health & Science University has a long history of performing Medicaid 1115 waiver evaluations, including a completed evaluation of Oregon's implementation of Coordinated Care Organizations (2012 – 2017) and ongoing evaluations of Oregon's renewal of the CCO demonstration and Washington State's Medicaid Transformation Project (MTP), which includes a similar SUD element. CHSE has also worked successfully with OHA on a number of projects related to Value-Based Payments and other payment reform activities. The state selected CHSE as the independent evaluator based on their past experience with conducting waiver evaluations in Oregon and their experience with SUD evaluations in other states. CHSE has demonstrated a legacy of excellence and understanding in evaluating waivers, being fair and impartial in their evaluations. Having an established relationship with OHA from working on other waivers enables CHSE to begin work on this waiver in a timely manner and meet the deliverables. The evaluator does not have any financial or other conflicts of interest.

2. Timeline

The following timeline presents anticipated start and end dates for evaluation activities described above, based on the schedule of deliverables in the waiver STCs.

Table 3: Evaluation Deliverables

Deliverable	Date Due to CMS
Draft Evaluation Plan	October 5, 2021
Mid-point Assessment	December 31, 2023
Draft Interim Evaluation Report	July 31, 2025
Draft Summative Report	September 30, 2027

Table 4: Evaluation Tasks

Task	Start Date	End Date
Support tasks		
Facilitate kickoff meeting with OHA	Jun 2022	Jul 2022
Prepare Quantitative Analysis Plan	Jul 2022	Oct 2022
Obtain IRB approval	May 2021	Aug 2022
Execute data use agreements	Jun 2022	Nov 2022
Facilitate monthly/bi-monthly check-ins	Jun 2022	Sep 2027
Build database and process quantitative data		

Obtain & process Jan 2017 – Jun 2022 claims data for Mid-Point Assessment	Apr 2023	Jun 2023
Task	Start Date	End Date
Calculate new quality measures and add to staging process	Apr 2023	Jul 2023
Obtain & process Jan-Jun 2022 claims data for Interim Report	Oct 2024	Dec 2024
Obtain & process claims through Dec 2025 for Summative Report	Oct 2026	Jan 2027
Quantitative Analysis for Mid-Point Assessment		
Code & calculate measures for MPA	Jan 2023	Jun 2023
Perform quantitative analysis including modeling	Jun 2023	Aug 2023
Qualitative work for Mid-Point Assessment		
Conduct stakeholder engagement	Sep 2022	Nov 2022
Prepare interview guide	Oct 2022	Dec 2022
Recruit informants, conduct interviews, and analyze data	Nov 2022	May 2023
Deliver Mid-Point Assessment		
Write draft report	Jun 2023	Oct 2023
Send draft for OHA review	Oct 31, 2023	
OHA reviews Draft #1 (assume 30 days)	Oct 31, 2023	Nov 30, 2023
Evaluator finalizes draft	Dec 1, 2023	Dec 22, 2023
Submit to CMS (OFFICIAL DUE DATE)	Dec 31, 2023	
Quantitative Analysis for Interim Evaluation Report		
Code & calculate measures for Interim Report	Jul 2024	Dec 2024
Perform quantitative analysis including modeling	Dec 2024	Mar 2025
Deliver Interim Report		
Write draft report	Jan 2025	May 2025
Deliver Draft #1 for OHA review	May 31, 2025	
OHA reviews Draft #1 (assume 30 days)	Jun 1, 2025	Jun 30, 2025
Evaluator finalizes Draft	Jul 1, 2025	Jul 25, 2025
Submit Draft for CMS review (OFFICIAL DUE DATE)	Jul 31, 2025	
CMS reviews Draft (assume 60 days)	Aug 1, 2025	Sep 30, 2025
Submit final report based on CMS comments	Nov 30, 2025	
Quantitative Analysis for Summative Evaluation Report		
Calculate measures for Summative Report	Nov 2026	Jan 2027
Carry out quantitative analysis for Summative Report	Feb 2027	May 2027
Qualitative work for Summative report		
Prepare interview guide	Apr 2025	Jun 2025
Recruit informants, conduct interviews, and analyze data	Jul 2025	Jan 2026
Deliver Summative Evaluation Report		

Write draft report	Mar 2027	Jun 2027
Deliver Draft #1 for OHA review	Jul 31, 2027	
Task	Start Date	End Date
OHA reviews Draft #1 (assume 30 days)	Aug 1, 2027	Aug 30, 2027
Evaluator finalizes draft	Sep 1, 2027	Sep 25, 2027
Submit Draft for CMS review (OFFICIAL DUE DATE)	Sept 30, 2027	
CMS reviews Draft (assume 60 days)	Oct 1, 2027	Nov 30, 2027
Submit final report based on CMS comments	Jan 30, 2028	

3. Evaluation Budget

Table 5 below presents the total demonstration budget for tasks in this work plan.

Table 5: Evaluation Budget

Deliverable	Cost
Mid-Point Assessment	\$371,881
Interim Report	\$537,204
Summative Report	\$935,401
Total	\$1,884,486

Staff type	Hours	Rate	Cost
Principal Investigator	661.2	\$275	\$181,841
Project Manager/Co- Investigator	2517.0	\$250	\$629,245
Statistical Analyst	2581.1	\$225	\$580,740
Qualitative Analyst	1607.8	\$225	\$240,252
Research Assistant	431.5	\$175	\$75,508
TAF data			\$136,900
Total			\$1,884,486

The budget covers:

1. All quantitative data-related tasks including:
 - a. Processing data from Medicaid claims, APAC, and other sources listed in the Data Elements table below.
 - b. Calculating standard and custom quality metrics and other needed quantitative data fields (e.g., chronic disease score).
 - c. Creating subgroups for analysis.
 - d. Statistical analysis: descriptive and modeling for entire population and subgroups.
 - e. Interpreting results.
 - f. Creating tables and visuals to communicate the results.

- g. Purchasing TAF data for 2021-2023. The Evaluator will provide 2017-2020 TAF data, purchased through other funding sources.
- 2. Qualitative/policy analysis tasks including:
 - a. Creating interview guides and scripts.
 - b. Developing sampling frames.
 - c. Performing interviews and stakeholder engagement.
 - d. Coding and analyzing results.
 - e. Analyzing policy and program documents.
 - f. Interpreting qualitative and quantitative results.
- 3. Report preparation
 - a. Developing and refining report outlines.
 - b. Integrating all demonstration results.
 - c. Writing the Mid-Point Assessment, Interim, and Summative reports.
 - d. Editorial review, assembly, layout, and copyediting of reports.
- 4. Project management
 - a. Convening regular meetings with OHA team.
 - b. Convening regular internal team meetings.
 - c. Tracking evaluation timeline and tasks.
 - d. Managing compliance activities (IRB/DUA).

4. Data Elements

Table 6: Data Elements Required for the Evaluation

Hypothesis	Data Element	Notes	Data Source	Included in TAF?
1	Initiation of treatment for SUD	Use HEDIS definition	Claims	Yes
1	Engagement in treatment for SUD	Use HEDIS definition	Claims	Yes
1	SUD diagnosis	Use Monitoring Protocol specifications	Claims	Yes
1	Any SUD treatment	Use Monitoring Protocol specifications	Claims	Yes
1, 4	Early intervention	Use Monitoring Protocol specifications	Claims	Yes
1, 4	SUD provider availability	Number of behavioral health providers enrolled in Medicaid that billed for SUD services	Claims; provider enrollment database	Maybe ^(a)
1	SUD provider availability – MAT	Number of providers enrolled in Medicaid that billed for MOUD services during the measurement period	Claims; provider enrollment database	Maybe ^(a)
1, 4	Number of SUD IMDs providing treatment for SUD		Claims; State Provider Enrollment SUD IMD data	No
1, 4	Number of beds in SUD IMDs providing treatment for SUD		State Provider Enrollment SUD IMD Data	No
2, 4	Continuation of pharmacotherapy for OUD	NQF # 3175	Claims	Yes
2	Outpatient services	Use Monitoring Protocol specifications	Claims	Yes
2	Residential and inpatient services	Use Monitoring Protocol specifications	Claims	Maybe ^(b)
2	Withdrawal management	Use Monitoring Protocol specifications	Claims	Yes
2	Medicaid beneficiaries treated in an SUD IMD for SUD	Use Monitoring Protocol specifications	Claims, State Provider Enrollment SUD IMD data	No
2	Average length of stay in SUD IMDs	Use Monitoring Protocol specifications	Claims, State Provider	No

			Enrollment SUD IMD data	
2	Medication assisted treatment	Use Monitoring Protocol specifications	Claims	Yes
2	Access to preventive/ambulatory services for beneficiaries with SUD	Use Monitoring Protocol specifications	Claims	Yes
2, 3, 4	Beneficiaries with SUD receiving supportive housing services	Identify services using billing codes to be opened in January 2022	Claims, CIS Billing Guidance	No
2, 3, 4	Beneficiaries with SUD receiving supportive employment services	Will need OHA guidance for identifying services in claims	Claims, CIS Billing Guidance	No
2, 3, 4	Beneficiaries with SUD receiving PDS	Will need OHA guidance for identifying services in claims	Claims, PDS Billing Guidance	No
3	ED utilization for SUD	Use Monitoring Protocol specifications	Claims	Yes
3	Inpatient admissions for SUD	Use Monitoring Protocol specifications	Claims	Yes
3	Follow-up after ED visits for MH	HEDIS/NCQA	Claims	Yes
3	Follow-up after ED visits for AOD	HEDIS/NCQA	Claims	Yes
4	Readmissions (all-cause)	Use Monitoring Protocol specifications	Claims	Yes
5	Use of opioids at high dosage in persons without cancer	Use Monitoring Protocol specifications	Claims	Yes
5	Concurrent use of opioids and benzodiazepines	Use Monitoring Protocol specifications	Claims	Yes
5	Overdose deaths due to any opioid	Use Monitoring Protocol specifications	State death data	No
Cost	ED spending	See Table 2	Claims	Yes
Cost	Other outpatient (non-ED) spending	See Table 2	Claims	Yes
Cost	Inpatient spending	See Table 2	Claims	Yes
Cost	Prescription drug spending	See Table 2	Claims	Yes
Cost	Behavioral health spending	See Table 2	Claims	Yes
Cost	Total spending	See Table 2	Claims	Yes

Cost	SUD IMD spending	Use Monitoring Protocol specifications	Claims, State Provider Enrollment SUD IMD data	No
Cost	SUD Non-SUD IMD spending	Use Monitoring Protocol specifications	Claims, State Provider Enrollment SUD IMD data	No
Cost	Non-SUD spending	Use Monitoring Protocol specifications	Claims	No

Notes: (a) Provider information might be available in TAF data.

(b) Residential TAF files might be incomplete.

**ATTACHMENT F:
Community Integration Services and Eligibility**

Target Group: Housing and employment supports eligibility is targeted to Medicaid beneficiaries with a SUD diagnosis who are enrolled under the Medicaid State Plan.

Needs-Based Criteria and Risk Factors: The Oregon Health Authority (OHA) assures there are needs-based criteria for receipt of institutional services and participation in certain waivers that are more stringent than the criteria below for receipt of Community Integration Services provided through the 1115 SUD Demonstration Waiver.

An individual must meet the following health needs-based criteria and is expected to benefit from housing or employment supports:

1. Individual has a behavioral health need, which is defined as a substance use need, where an assessment using the American Society of Addiction Medicine (ASAM) Criteria (or equivalent assessment) would indicate that the individual would meet at least ASAM level 1.0, indicating the need for outpatient Substance Use Disorder (SUD) treatment.

AND The individual meets at least one of the following sets of risk factors:

1. The individual has at least one or more of the following risk factors and is expected to benefit from housing support services:

- a. At risk of homelessness.
 - i. At risk of homelessness is defined as an individual who will lose their primary nighttime residence.
- b. Homelessness.
 - i. Homelessness is defined as lacking a fixed, regular, and adequate nighttime residence, meaning:
 - 1) Has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings (e.g., a car, park, abandoned building, bus or train station, airport, or camping ground).
 - 2) Living in a place not meant for human habitation, in an emergency shelter, in transitional housing (including congregate shelters, transitional housing, and hotels and motels) or exiting an institution where they temporarily resided in one of the aforementioned situations.
 - 3) Fleeing domestic violence or another dangerous situation related to violence.
 - 4) An individual living with children or unaccompanied youth unstably housed. Unstably housed is defined as an individual living with children or unaccompanied youth who have not had a lease or ownership interest in a housing unit in the last 60 or more days, who have had two or more moves in the last 60 days, and who are likely to continue in such a state.

- c. History of frequent or lengthy stays in an institutional setting (as defined in 42 CFR 435.1010) or residential setting (consistent with those settings noted in OAR Chapter 309, Division 18 for residential services and residential treatment settings).
 - i. Frequent is defined as more than one time in the past 12 months.
 - ii. Lengthy is defined as at least 28 or more consecutive days within an institutional setting, assisted living facility, or residential setting.
- d. History of frequent emergency department (ED) visits and/or hospitalizations.
 - i. Frequent is defined as more than four ED visits and/or hospitalizations in the past 12 months.
- e. History of involvement with the criminal justice system.
 - i. History of involvement with the criminal justice system is defined as an individual who has been confined to a prison, jail, halfway house, boot camp, weekend program, and other justice-involved facilities in which individuals are locked up overnight, for at least 24 hours over the past 12 months.
- f. History of frequent moves or loss of housing as a result of substance use disorder (e.g., lapsed rent payments due to substance use related residential treatment or hospitalization (including withdraw management), or psychiatric hospitalization).
 - i. Frequent is defined as more than once in the past six months.

OR

2. The individual has at least one or more of the following risk factors and is expected to benefit from CIS:

- a. More than one instance of inpatient or outpatient SUD service in the past two years.
- b. At risk of deterioration of mental illness and/or SUD, including one or more of the following:
 - i. Persistent or chronic risk factors such as social isolation due to a lack of family or social supports, poverty, criminal justice involvement, or homelessness.
 - 1) OHA will apply the same definition of homelessness as required for the housing supports risk factors, as described above.
 - ii. Care for SUD requires multiple provider types, including behavioral health, primary care, long-term services and supports, or other supportive services.
 - iii. Past psychiatric history, with ongoing treatment and supports necessary to ensure functional improvement.
 - iv. Dysfunction in role performance, including one or more of the following:
 - 1) SUD disrupts employment or schooling, or put employment at risk of termination or schooling suspension.

- 2) A history of multiple terminations from work or suspensions/expulsions from school.
- 3) Cannot succeed in a structured work or school setting without additional support or accommodations.

OR

3. The individual has at least one or more of the following risk factors and is expected to benefit from employment support services:

- a. Unable to be gainfully employed for at least 90 consecutive days in the past 12 months due to a mental or physical impairment.
- b. Unable to obtain or maintain employment resulting from age, physical/sensory disability, or moderate to severe brain injury.
- c. More than one instance of inpatient or outpatient SUD service in the past two years.
- d. At risk of deterioration of mental illness and/or SUD, including one or more of the following:
 - i. Persistent or chronic risk factors such as social isolation due to a lack of family or social supports, poverty, criminal justice involvement, or homelessness.
 - 1) DMAS will apply the same definition of homelessness as required for the housing supports risk factors, as described above.
 - ii. Care for mental illness or SUD requires multiple provider types, including behavioral health, primary care, long-term services and supports, or other supportive services.
 - iii. Past psychiatric history, with ongoing treatment and supports necessary to ensure functional improvement.
 - iv. Dysfunction in role performance, including one or more of the following:
 - 1) Behaviors that disrupt employment or schooling, or put employment at risk of termination or schooling suspension.
 - 2) A history of multiple terminations from work or suspensions/expulsions from school.
 - 3) Cannot succeed in a structured work or school setting without additional support or accommodations.
 - 4) Performance significantly below expectation for cognitive/developmental level.

Housing and Employment Supports Services

Housing Supports: Housing supports services are determined to be necessary for an individual to obtain and reside in an independent community setting and are tailored to the goal of maintaining an individual's personal health and welfare in a home and community-based setting as they are transitioning from an IMD. Housing supports services may include one or more of the following components:

Individual Housing and Pre-Tenancy Services:

1. Conducting an assessment to identify the individual's needs and preferences related to housing (e.g., type, location, living alone or with someone else, identifying a roommate, accommodations needed, or other preferences).
2. Assisting individuals with budgeting for housing/living expenses, including financial literacy education on budget basics.
3. Assisting individuals with finding and applying for housing, including filling out housing, utility, and rental assistance applications and obtaining and submitting appropriate documentation.
4. Assisting individuals with completing reasonable accommodation requests as needed to obtain housing.
5. Developing an individualized housing support plan that identifies short and long-term measurable goals, how goals will be achieved and how barriers to achieving goals will be addressed.
6. Assisting with identifying and securing resources to obtain housing.
7. Ensuring the living environment is safe (including the assessment of health risks to ensure the living environment is not adversely affecting the occupants' health) and accessible for move-in.
8. Assisting in arranging for and supporting the details and activities of the move-in.

Individual Housing and Tenancy Sustaining Services:

1. Coordination with the individual to plan, participate in, review, update and modify their individualized housing support plan on a regular basis, including at redetermination and/or revision plan meetings, to reflect current needs and preferences and address existing or recurring housing retention barriers.
2. Providing assistance with securing and maintaining entitlements and benefits (including rental assistance) necessary to maintain community integration and housing stability (e.g., assisting individuals in obtaining documentation, assistance with completing documentation, navigating the process to secure and maintain benefits, and coordinating with the entitlement/benefit assistance agency).
3. Assistance with securing supports to preserve the most independent living.
4. Monitoring and follow-up to ensure that linkages are established and services are addressing community integration needs.
5. Providing supports to assist the individual in the development of independent living skills to remain in the most integrated setting (e.g., skills coaching to maintain a healthy living environment, develop and manage a household budget, interact appropriately with neighbors or roommates, reduce social isolation, utilize local transportation).
6. Providing supports to assist the individual in communicating with the landlord and/or property manager.

7. Education and training on the role, rights, and responsibilities of the tenant and landlord.

8. Providing training and resources to assist the individual with complying with his/her lease.

9. Assisting in reducing the risk of eviction by providing services to prevent eviction (e.g., to improve conflict resolution skills; coaching; role-playing and communication strategies targeted towards resolving disputes with landlords and neighbors; communicating with landlords and neighbors to reduce the risk of eviction; addressing biopsychosocial behaviors that put housing at risk; providing ongoing support with activities related to household management; and linking the tenant to community resources to prevent eviction).

10. Providing early identification and intervention for actions or behaviors that may jeopardize housing.

11. Providing a pest eradication treatment no more than one time per year that is necessary for the individual's health and safety as documented by a health care professional. This service is not intended for monthly, routine or ongoing treatments. This service is coverable when the individual is living in their own home, when not already included in a lease, and when the pest eradication is for the management of health and safety as identified in the person-centered service plan. The service is not otherwise provided under this waiver (except as part of Community Transition Services for individuals transitioning out of institutional settings and provider-owned and operated congregate living arrangements) and the Medicaid state plan, including Early and Periodic Screening, Diagnostic and Treatment (EPSDT).

12. Modifications to improve accessibility of housing (e.g., ramps, rails) and safety (e.g., grip bars in bathtubs) when necessary to ensure occupant's health, and when modification is not covered by another entity as required by law.

13. Assistance with connecting the enrollee to expert community resources to address legal issues impacting housing and thereby adversely impacting health, such as assistance with breaking a lease due to unhealthy living conditions.

14. Shared living support services that provide for the payment for the additional costs of rent and food that can be reasonably attributed to an unrelated live-in personal caregiver who resides in the same household as the individual. Payment will not be made when the individual lives in the caregiver's home or in a residence that is owned or leased by the provider of Medicaid services.

Community Transition Services:

1. Supports designed to assist individuals transitioning out of institutional settings and provider-owned and operated congregate living arrangements, not to exceed \$5,000 per member per lifetime, regardless of the number of services. Supports cover expenses

necessary to enable individuals to obtain an independent, community-based living setting. Specifically, allowable expenses may include: security deposits required to obtain a lease on an apartment or home; essential household furnishings required to occupy and use a community domicile, including furniture, window coverings, food preparation items, and bed/bath linens; set-up fees or deposits for utility or service access, including telephone, electricity, heating and water; services necessary for the individual's health and safety such as pest eradication and one-time cleaning prior to occupancy; moving expenses; necessary home accessibility adaptations; and activities to assess need, arrange for, and procure needed resources.

Services Not Included in the CIS Housing Benefit:

1. Payment of rent or other room and board costs.
2. Capital costs related to the development or modification of housing.
3. Expenses for utilities or other regular occurring bills.
4. Goods or services intended for leisure or recreation.
5. Duplicative services from other state or federal programs.
6. Services to individuals in a correctional institution or an Institution of Mental Disease (IMD) (other than services that meet the exception to the IMD exclusion).
7. Community Transition Services are furnished only to the extent that they are reasonable and necessary as determined through the service plan development process, clearly identified in the service plan and only when the person is unable to meet such expense or when the services cannot be obtained from other sources. Community Transition Services do not include monthly rental or mortgage expense, food, regular utility charges, and/or household appliances or items that are intended for purely diversional/recreational purposes.

Employment Supports: Employment supports services are determined to be necessary for an individual to obtain and maintain employment in the community. Employment supports services will be individualized and may include one or more of the following components:

Pre-Employment Services (individual and small group):

1. Pre-vocational/job-related discovery or assessment.
2. Assessment of workplace readiness (e.g., people skills, technology knowledge).
3. Person-centered employment planning.
4. Individualized job development and placement (e.g., job fairs, interviews).
5. Mentoring (e.g., on how to change cultural behavior, re-entry from incarceration).
6. Career coaching (e.g., resume coaching, interview coaching).
7. Job carving.
8. Benefits education, planning, and training.
9. Transportation (provided either as a separate transportation service to employment services or to the individual's job, or services included in the rate paid to the provider of employment services).
10. Soft skill training (e.g., interpersonal skills, customer service, answering the phone, workplace culture).

11. Volunteer work and paid internships.
12. Job preparation training (e.g., coaching on appropriate personal hygiene and attire, timeliness, workplace behavior and communication, reliability).
13. Training to improve executive functioning skills (e.g., sustaining attention, organizing, and task prioritization).
14. Behavioral modification (e.g., to increase emotional maturity, to developed alternative coping mechanisms for adverse behaviors such as alcohol/drug use).
15. Coordination with other care providers to address behavioral health needs that impact an individual's ability to secure and maintain employment.

Employment Sustaining Services (individual and small group):

1. Job coaching (including situational assessments).
2. Career advancement services.
3. Negotiation with employers.
4. Job analysis.
5. Training and systemic instruction
6. Benefits education and planning.
7. Financial and health literacy.
8. Transportation (provided either as a separate transportation service to employment services or to the individual's job, or included in the rate paid to the provider of employment services).
9. Payment for public transportation (e.g., bus passes, mass transit vouchers) to support the enrollee's ability to participate in work/community engagement and to gain access to community services, activities, and resources.
10. Account credits for cost-effective private forms of transportation (e.g., taxi, ridesharing) in areas without access to public transit in order to enable individuals to participate in work/community engagement and to gain access to community services, activities, and resources.
11. Transportation education assistance in gaining access to public or mass transit, including access locations, pilot services available via public transportation, and how to purchase transportation passes.
12. Assistance with linking to high quality child care and after-school programs and programs that increase adults' capacity to participate in work/community engagement activities.
13. Asset development.
14. Follow-along supports.
15. Peer supports for employment provided by a co-worker or other job site personnel, provided that the services furnished (e.g., emotional support, connections to resources) are not part of the normal duties of the co-worker, supervisor or other personnel and these individuals meet the pertinent qualifications for the provider of service.

Services Not Included in the Employment Supports Benefit:

1. Generalized employer contacts that are not connected to a specific enrolled individual or an authorized service.
2. Employment support for individuals in sub-minimum wage, or sheltered workshop settings.
3. Facility-based habilitation or personal care services.

4. Wage or wage enhancements for individuals.
5. Duplicative services from other state or federal programs.
6. Medicaid funds to defray the expenses associated with starting up or operating a business.

Provider Qualifications: Contracted CIS providers must assure staff providing housing and employment supports services maintain appropriate qualifications in order to effectively serve enrollees. Staff providing Community Integration Services must receive OHA approved housing supports trainings in accordance with evidence-based principles and practices, as well as other applicable trainings in accordance with the Oregon Health Authority contract. Below are the minimum provider staff qualifications. OHA and its CCOs (contingent upon OHA review and approval) may also impose licensure/certification/accreditation requirements beyond the minimum provider qualifications outlined below.

Provider type	Education and Experience	Skills	Services
Housing Supports	<ul style="list-style-type: none"> • Education (e.g., Bachelor’s degree, Associates degree, certificate) in a human/social services field or a relevant field; and/or • An individual certified as a recovery mentor or a peer support specialist or with commensurate experience; and/or • At least one year of relevant professional experience and/or training in the field of service. 	Knowledge of principles, methods, and procedures of services included under housing supports services, or comparable services meant to support an individual’s ability to obtain and maintain stable housing.	Individual Housing and Pre-Tenancy Services. <ul style="list-style-type: none"> • Individual Housing and Tenancy Sustaining Services. • Community Transition Services.
Employment Supports	Education (e.g., Bachelor’s degree, Associates degree, certificate) in a human/social services field or a relevant field; and/or <ul style="list-style-type: none"> • An individual certified as a recovery mentor or a peer support 	Knowledge of principles, methods, and procedures of services included under employment supports services, or comparable services meant to support an individual’s	<ul style="list-style-type: none"> • Pre-Employment Services (individual and small group). • Employment Sustaining Services (individual and small group).

	specialist or with commensurate experience; and/or <ul style="list-style-type: none"> • At least one year of relevant professional experience and/or training in the field of service. 	ability to obtain and maintain stable employment.	
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Administrative Approach: The state will provide a set of housing supports to certain high need Medicaid beneficiaries enrolled in the managed care delivery system by contracting with Oregon’s CCOs to provide the approved Community Integration Services and related activities. The state will maintain authority, accountability, oversight, and evaluation of the CIS program, including oversight of delegated activities to its CCOs and any other contracted entities, as well as oversight of the CIS quality strategy described in STCs 26 – 29. The state will leverage multiple pathways to ensure a “no wrong door” approach to identifying enrollees who may be eligible for these services. Multiple entities, including CCOs, state agencies, community organizations, and providers, will play a critical role in identifying individuals for the CIS benefit. The state will send information it receives regarding potentially eligible enrollees to the MCOs to determine eligibility for the benefit. The state will develop standardized CIS screening questions that CCOs will use to determine CIS eligibility. The state will validate the eligibility determination provided by the CCOs.

The state will develop standardized elements for a CIS assessment to be performed by CCOs, and review/approve any changes to the assessment proposed by the CCOs. The state will require the MCOs to ensure their care coordinators develop the CIS person-centered care plan that reflects enrollees’ housing and employment-related needs, goals, and preferences, and to connect enrollees to providers and services authorized by the CCO. The state will require that CCOs, in collaboration with providers, track and report the services provided to High Needs Supports enrollees, ensuring accountability for service delivery and payment. The state will conduct periodic audits of payments to verify accurate reporting and spending.

The following activities will be delegated to CCOs; the state will monitor and ensure CCO compliance and performance with respect to these functions:

- Develop, manage, and contract with a network of CIS providers to deliver and pay claims for Community Integration Services.
- Screen members to identify those potentially eligible for Community Integration Services.
- Conduct the CIS eligibility screening to determine CIS eligibility based on the eligibility criteria set forth above.
- Perform ongoing data surveillance/identification of members to monitor any changes to the member’s CIS status.
- Oversee the provision of the standardized CIS assessment and the development/maintenance of the CIS person-centered care plan by the CCO care coordinators.

- Authorize Community Integration Services and care plan modifications.
- Work with CCOs to ensure care management and monitor/track enrollees' access to services and progress against their goals.

Payment Methodology: As applicable for any community integration services provided through managed care, the state will demonstrate that it has designed and implemented an adequate system for ensuring financial accountability of the CIS program. Working closely with the CCOs, the state will establish a payment floor for the federally-approved CIS. The services will be priced based on factors such as the intensity of services, duration of services, geography, contracted provider per unit cost, and comparable fee-for-service (FFS) service costs. The state will allow CCOs to negotiate CIS payment rates above the payment floor. Once the CIS program is fully implemented in a manner envisioned by the state, OHA may consider revising the payment methodology approach to remove the payment floor and allow CCOs to negotiate provider payment rates. The state will require CCOs to reimburse network providers authorized to deliver these services based on the standards and requirements set forth by the state. The state will conduct periodic audits of payments to verify accurate reporting and spending. The state will work with CMS to determine if a State Directed Preprint pursuant to 42 CFR 438.6(c) is required for these payments, and if so, will submit a preprint(s) for approval prior to implementation of the payments as required under 42 CFR 438.6(c)(2). Further, the state will demonstrate actuarial soundness pursuant to 42 CFR Part 438.

Table: Substance Use Disorder Demonstration Planned Subpopulations

Planned subpopulation reporting					Alignment with CMS-provided technical specifications manual					
Subpopulation category	Subpopulations	Reporting priority	Relevant metrics	Subpopulation type	State will report (Y/N)		Subpopulations		Relevant metrics	
					Y	N	Attest that planned subpopulation reporting within each category matches the description in the CMS-provided technical specifications manual (Y/N)	If the planned reporting of subpopulations does not match (i.e., column G = "N"), list the subpopulations state plans to report (Format comma separated) ^{a,b}	Attest that metrics reporting for subpopulation category matches CMS-provided technical specifications manual (Y/N)	If the planned reporting of relevant metrics does not match (i.e., column I = "N"), list the metrics for which state plans to report for each subpopulation category (Format metric number, comma separated)
<i>EXAMPLE:</i> Age group <i>(Do not delete or edit this row)</i>	<i>EXAMPLE:</i> Children <18, adults 18-64, and older adults 65+	<i>EXAMPLE:</i> Required	<i>EXAMPLE:</i> Metrics #1-3, 6-12, 23, 24, 26, 27	<i>EXAMPLE:</i> CMS-provided	<i>EXAMPLE:</i> Y	<i>EXAMPLE:</i> N	<i>EXAMPLE:</i> N	<i>EXAMPLE:</i> Children/Young adults 12-21, Adults 21-65	<i>EXAMPLE:</i> N	<i>EXAMPLE:</i> 1, 2, 3
Age group	Children <18, adults 18-64, and older adults 65+	Required	Metrics #1-3, 6-12, 23, 24, 26, 27	CMS-provided	Y	Y	N		N	3,7,8,9,10,12,23,24
Dual-eligible status	Dual-eligible (Medicare-Medicaid eligible), Medicaid only	Required	Metrics #1-3, 6-12	CMS-provided	Y	N	N	The dual-eligible population for the SUD measures is determined using a field available in MMIS/DSSURS titled "ede_medicare_status". The values used to flag dual-enrolled members are: when ede_medicare_status in ('MA','MB','MAB','MAD','MBD','MABD') then 'Y' We will use Oregon Health Groupers (OHG) codes identified by metrics team, to be consistent: https://www.oregon.gov/oha/HPA/ANALYTICS/CCOMetric/s/2020-2021-spes-(Effective-Contraceptive-Use)-20201230.pdf	N	3,7,8,9,10,12
Pregnancy status	Pregnant, Not pregnant	Required	Metrics #1-3, 6-12	CMS-provided	N	N	N	Subpopulation for Criminal justice, once the Behavioral Health Data Warehouse is fully operational, we will be able to flag individuals involved with criminal justice for any of these reasons: civil commitment, aid and assist, guilty except for insanity, driving under the influence, class E violation for possession of small amount of illicit drugs. The eCourts data will not include other offenses. This arrest data will be available for the period beginning April 1, 2023. If this is not a satisfactory approach, the alternative is to wait for the new data system ROADS. Hopefully ROADS will have reliable self-report arrest data. At this time, ROADS is expected to be fully implemented by September 30, 2023.	N	3,7,8,9,10,12
Criminal justice status OUD population <i>[Insert row(s) for any state-specific subpopulation(s)]</i>	Criminally involved, Not criminally involved Opioid diagnosis	Recommended	Metrics #2-12, 23, 24, 26, 27, 36	CMS-provided	N	N	N		N	

^a If the state is not reporting a required subpopulation category (i.e., column E = "N"), enter explanation in corresponding row in column H.

^b If the state is reporting on the Dual-eligible status, Pregnancy status, Criminal justice status, and OUD population subpopulation categories, the state should use column H to outline its subpopulation identification approach as explained in Version 4.0 of the Medicaid Section 1115 Substance Use Disorder Demonstrations Monitoring Protocol

^c If the state is planning to phase in the reporting of any of the subpopulation categories, the state should (1) select N in column G and (2) provide an explanation and the

Medical Services 1115 SUD Demonstration Monitoring Protocol (Part 4) - Reporting Schedule (Version 6.0)
 Version:
 Oregon Health Plan Substance Use Disorder 1115 Demonstration

Instructions:

- (1) Use the reporting schedule table (Table 1) on the program column A to enter the required information for the corresponding row of column B. All monitoring report dates and reporting periods listed on the Table 1 are based on the 1115 SUD Demonstration. All 1115 SUD Demonstration reporting schedules are based on the 1115 SUD Demonstration. The information entered in this table will be used to generate the 1115 SUD Demonstration reporting schedule in Table 2. All data in the table must be completed in entirety and in the correct format for the monitoring schedule to be accurate and complete.
- (2) Review the data reporting schedule in the 1115 SUD Demonstration reporting schedule table (Table 2). For each of the reporting categories listed in column E, select Y or N to indicate if the 1115 SUD Demonstration reporting schedule is being reported for the corresponding row of column B. All monitoring report dates and reporting periods listed on the Table 1 are based on the 1115 SUD Demonstration. All 1115 SUD Demonstration reporting schedules are based on the 1115 SUD Demonstration. The information entered in this table will be used to generate the 1115 SUD Demonstration reporting schedule in Table 2. All data in the table must be completed in entirety and in the correct format for the monitoring schedule to be accurate and complete.

Table 1. Substance Use Disorder Demonstration Reporting Periods Input Table

Year of the 1115 SUD Demonstration program	Reporting period start date (MM/DD/YYYY)	Reporting period end date (MM/DD/YYYY)	Reporting period type (M, Q, Y)
2021	04/01/2021	06/30/2021	Q
2021	07/01/2021	09/30/2021	Q
2021	10/01/2021	12/31/2021	Y
2022	01/01/2022	03/31/2022	Q
2022	04/01/2022	06/30/2022	Q
2022	07/01/2022	09/30/2022	Q
2022	10/01/2022	12/31/2022	Y

Table 2. Substance Use Disorder Demonstration Reporting Schedule

1115 SUD Demonstration program year	1115 SUD Demonstration reporting period start date (MM/DD/YYYY)	1115 SUD Demonstration reporting period end date (MM/DD/YYYY)	Reporting period type (M, Q, Y)	1115 SUD Demonstration reporting period start date (MM/DD/YYYY)	1115 SUD Demonstration reporting period end date (MM/DD/YYYY)	Reporting period type (M, Q, Y)	Reporting period type (M, Q, Y)	Reporting period type (M, Q, Y)	Reporting period type (M, Q, Y)	Reporting period type (M, Q, Y)	Reporting period type (M, Q, Y)	Reporting period type (M, Q, Y)	Reporting period type (M, Q, Y)
2021	04/01/2021	06/30/2021	Q	04/01/2021	06/30/2021	Q	Q	Q	Q	Q	Q	Q	Q
2021	07/01/2021	09/30/2021	Q	07/01/2021	09/30/2021	Q	Diagnosis administration	09/30/2021	Y				
							Diagnosis administration	09/30/2021	Y				
							Diagnosis administration	09/30/2021	Y				
							Diagnosis administration	09/30/2021	Y				
2021	10/01/2021	12/31/2021	Y	10/01/2021	12/31/2021	Y	Diagnosis administration	12/31/2021	Y				
							Diagnosis administration	12/31/2021	Y				
							Diagnosis administration	12/31/2021	Y				
							Diagnosis administration	12/31/2021	Y				
2022	01/01/2022	03/31/2022	Q	01/01/2022	03/31/2022	Q	Diagnosis administration	03/31/2022	Y				
							Diagnosis administration	03/31/2022	Y				
							Diagnosis administration	03/31/2022	Y				
							Diagnosis administration	03/31/2022	Y				

1115 SUD Demonstration Reporting Schedule
 1115 SUD Demonstration reporting schedule table (Table 2) defines the data reporting schedule for each demonstration year and quarter. Reporting categories are not required to report monitoring data and other monitoring product information. The data should be based on the 1115 SUD Demonstration reporting schedule in Table 2. All data in the table must be completed in entirety and in the correct format for the monitoring schedule to be accurate and complete.

1. Title page for the state’s substance use disorder (SUD) demonstration or the SUD component of the broader demonstration

The state should complete this title page as part of its monitoring protocol. This form should be submitted as the title page for all monitoring reports. The content of this table should stay consistent over time. Definitions for certain rows are below the table.

Medicaid Section 1115 SUD Demonstrations Monitoring Protocol – Part B Version 3.0
 Oregon Health Plan Substance Use Disorder Section 1115 Demonstration

State	<i>Oregon</i>
Demonstration name	<i>Oregon Health Plan SUD 1115 Waiver Demonstration</i>
Approval period for section 1115 demonstration	<i>04/08/2021- 03/31/2026</i>
SUD demonstration start date^a	<i>04/08/2021</i>
Implementation date of SUD demonstration, if different from SUD demonstration start date^b	<i>04/08/2021</i>

SUD (or if broader demonstration, then SUD-related) demonstration goals and objectives

This demonstration provides Oregon with the opportunity to provide a fuller continuum of care to OHP members with substance use disorder (SUD). A key part of this will be the state’s ability to receive FFP for members whom are short-term residents in residential and inpatient treatment settings that qualify as Institutions for Mental Diseases (IMDs). It will also support Oregon’s efforts to implement models of care focused on increasing support for individuals in the community and home, outside of institutions, and improve access to a continuum of SUD evidence-based services at varied levels of intensity. This continuum of care is based on the American Society of Addiction Medicine (ASAM) criteria and/or other nationally recognized assessment and placement tools that reflect evidence-based clinical treatment guidelines. This demonstration will also allow Oregon to provide community integration services which consists of housing and employment supports to individuals transitioning back into the community from an IMD or other residential setting.

1. Assist Oregon in increasing identification, initiation, and engagement of Medicaid beneficiaries diagnosed with SUD;
2. Assist the state in increasing beneficiary adherence to, and retention in, SUD treatment programs;
3. Assist Oregon in reducing inappropriate or preventable utilization of emergency departments and inpatient hospital settings through improved access to a continuum of care services; and
4. Provide a continuum of care to increase the chances of Medicaid beneficiaries of having a successful recovery process.

^a **SUD demonstration start date:** For monitoring purposes, CMS defines the start date of the demonstration as the *effective date* listed in the state’s STCs at time of SUD demonstration approval. For example, if the state’s STCs at the time of SUD demonstration approval note that the SUD demonstration is effective January 1, 2020 – December 31, 2025, the state should consider January 1, 2020 to be the start date of the SUD demonstration. Note that the effective date is considered to be the first day the state may begin its SUD demonstration. In many cases, the effective date is distinct from the approval date of a demonstration;

that is, in certain cases, CMS may approve a section 1115 demonstration with an effective date that is in the future. For example, CMS may approve an extension request on 12/15/2020, with an effective date of 1/1/2021 for the new demonstration period. In many cases, the effective date also differs from the date a state begins implementing its demonstration.

^b Implementation date of SUD demonstration: The date the state began claiming federal financial participation for services provided to individuals in institutions for mental disease.

2. Acknowledgement of narrative reporting requirements

The state has reviewed the narrative questions in the Monitoring Report Template provided by CMS and understands the expectations for quarterly and annual monitoring reports. The state will provide the requested narrative information (with no modifications).

3. Acknowledgement of budget neutrality reporting requirements

The state has reviewed the Budget Neutrality Workbook provided by the CMS demonstration team and understands the expectations for quarterly and annual monitoring reports. The state will provide the requested budget neutrality information (with no modifications).

4. Retrospective reporting

The state is not expected to submit metrics data until after protocol approval, to ensure that data reflects the monitoring plans agreed upon by CMS and the state. Prior to monitoring protocol approval, the state should submit quarterly and annual monitoring reports with narrative updates on implementation progress and other information that may be applicable, according to the requirements in its STCs.

For a state that has monitoring protocols approved after one or more initial quarterly monitoring report submissions, it should report metrics data to CMS retrospectively for any prior quarters of the section 1115 SUD demonstration that precede the monitoring protocol approval date. A state is expected to submit retrospective metrics data—provided there is adequate time for preparation of these data—in its second monitoring report submission that contains metrics. The retrospective report for a state with a first SUD DY of less than 12 months, should include data for any baseline period quarters preceding the demonstration, as described in Part A of the state’s monitoring protocols (see Appendix B of the instruction for further guidance determining baseline periods for first SUD DYs

that are less than 12 months.) If a state needs additional time for preparation of these data, it should propose an alternative plan (i.e., specify the monitoring report that would capture the data) for reporting retrospectively on its section 1115 SUD demonstration.

In the monitoring report submission containing retrospective metrics data, the state should also provide a general assessment of metrics trends from the start of its demonstration through the end of the current reporting period. The state should report this information in Part B of its report submission (Section 3: Narrative information on implementation, by milestone and reporting topic). This general assessment is not intended to be a comprehensive description of every trend observed in the metrics data. Unlike other monitoring report submissions, for instance, the state is not required to describe all metric changes (+ or - greater than 2 percent). Rather, the assessment is an opportunity for a state to provide context on its retrospective metrics data and to support CMS’s review and interpretation of these data. For example, consider a state that submits data showing an increase in the number of medication-assisted treatment (MAT) providers (Metric #14) over the course of the retrospective reporting period. This state may decide to highlight this trend for CMS in Part B of its report (under Milestone 4) by briefly summarizing the trend and explaining that during this period, a grant supporting training for new MAT providers throughout its state was implemented.

For further information on how to compile and submit a retrospective report, the state should review Section B of the Monitoring Report Instructions document.

The state will report retrospectively for any quarters prior to monitoring protocol approval as described above, in the state’s second monitoring report submission that contains metrics after protocol approval.

The state proposes an alternative plan to report retrospectively for any quarters prior to monitoring protocol approval: *Insert narrative description of proposed alternative plan for retrospective reporting. The state should provide justification for its proposed alternative plan.*