

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop S2-25-26
Baltimore, Maryland 21244-1850



State Demonstrations Group

December 17, 2021

Mike Smith
Secretary
Vermont Agency of Human Services
280 State Drive
Waterbury, VT 05671

Dear Mr. Smith:

This letter is to inform you that the Centers for Medicare & Medicaid Services (CMS) has approved a temporary extension of the state's section 1115 demonstration, entitled "Vermont Global Commitment to Health" (GCH) (Project No.11-W-00194/1), in order to allow the state and CMS to continue negotiations over the state's June 30, 2021 demonstration extension application. This demonstration will now expire June 30, 2022.

CMS's approval is conditioned upon the state's continued compliance with the special terms and conditions (STC) defining the nature, character, and extent of anticipated federal involvement in the project. The current STCs, waivers, and prorated expenditure authorities will continue to apply during the temporary extension of this demonstration. The state's current budget neutrality agreement and per member per month amounts (as of DY 16) will continue to apply as described in the STCs, until June 30, 2022, or until the demonstration is extended, whichever is sooner. The state will not earn budget neutrality savings during this six-month temporary extension period.

For the temporary extension period, the state should continue to monitor its demonstration as stipulated in the current STCs. In addition, the state will be expected to include the temporary extension period in its demonstration evaluations. The state may include this temporary extension period within its evaluation for the current approval period, January 1, 2017 through December 31, 2021. Alternatively, if CMS approves an extension beyond June 30, 2022, the state may include this temporary extension period in the evaluation design and activities of the next full demonstration approval period. The state will submit to CMS a summative evaluation report in accordance with the approved evaluation design. The summative evaluation report will cover the full period of performance from January 1, 2017 through December 31, 2021 (and the temporary extension period if the state chooses). In the event that the state does not obtain an extension beyond June 30, 2022, the state should include the temporary extension period in its summative evaluation.


Your CMS project officer for this demonstration is Ms. Rabia Khan. She is available to answer any questions concerning your section 1115 demonstration. Ms. Khan can be reached at

Page 2 – Mr. Mike Smith

Rabia.Khan1@cms.hhs.gov. If you have questions regarding this communication, please contact me at (410) 786-9686.

Sincerely,

Judith A. Cash -
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Cash -S
Date: 2021.12.16 09:48:32
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Judith Cash
Director

Enclosure

cc: Gilson DaSilva, State Monitoring Lead, Medicaid and CHIP Operations Group

CENTERS FOR MEDICARE & MEDICAID SERVICES

WAIVER AUTHORITY

NUMBER: 11-W-00194/1

TITLE: Global Commitment To Health Section 1115 Demonstration

AWARDEE: Vermont Agency Of Human Services (AHS)

Under the authority of Section 1115(a)(1) of the Social Security Act (the Act) the following waivers are granted to enable Vermont to operate the Global Commitment to Health Section 1115 Demonstration. These waivers are effective beginning January 1, 2017 and are limited to the extent necessary to achieve the objectives below. These waivers may only be implemented consistent with the approved Special Terms and Conditions (STCs) set forth in the accompanying document.

All requirements of the Medicaid program expressed in law, regulation and policy statement, not expressly waived in this list, shall apply to the demonstration project for the period beginning January 1, 2017 through December 31, 2021. The only waiver authorities that apply to the Substance Use Disorder (SUD) IMD expenditure authority (effective July 1, 2018 through December 31, 2021) and Serious Mental Illness (SMI) IMD expenditure authority (effective January 1, 2020 through December 31, 2021) are numbers 5 (Payment to Providers) and 10 (Freedom of Choice) below.

1. State wide ness/Uniformity **Section 1902(a)(1)**

To the extent necessary to enable Vermont to operate the program differently in different geographical areas of the state.

2. Reasonable Promptness **Section 1902(a)(8)**

To allow the state to maintain a waiting list for high and moderate need individuals applying for home and community-based services (HCBS). To allow the state to require applicants for nursing facility and home and community-based services (including demonstration home and community-based waiver-like services) to complete a person-centered assessment and options counseling process prior to receiving such services. To permit waiting lists for eligibility for demonstration-only (non-Medicaid state plan) populations.

3. Amount, Duration, Scope of Services **Section 1902(a)(10)(B)**

To enable Vermont to vary the amount, duration and scope of services offered to various mandatory and optional groups of individuals affected by or eligible under the demonstration as long as the amount, duration and scope of covered services meets the minimum

requirements under title XIX of the Act for the group (if applicable) and the special terms and conditions.

To allow the state to provide nursing facility and home and community-based services based on relative need as part of the person-centered and options counseling process for new applicants for Choices for Care services; to permit certain individuals, based on need, to receive demonstration services that are not available to categorically eligible individuals, or other individuals in the same eligibility group, under the Medicaid state plan; and to limit the amount, duration, and scope of services to those included in the participants' approved care plan.

4. Financial Eligibility **Section 1902(a)(10)(C)(i)(III)**

To allow the state to use institutional income rules (up to 300 percent of the Supplemental Security Income payment level) for medically needy beneficiaries.

To allow the state to use institutional income and resource rules for the high and highest need groups of the medically needy in the same manner as it did for the terminated 1915(c) waiver programs that were subsumed under the Choices for Care demonstration in 2005.

Additionally, this waiver permits the state to have a resource standard of \$10,000 for high and highest need medically needy individuals who are single and own and reside in their own homes and who select home and community-based services (HCBS) in lieu of institutional services.

5. Payment to Providers **Sections 1902(a)(13),
1902(a)(30)**

To allow the state, through the Department of Vermont Health Access, to establish rates with providers on an individual or class basis without regard to the rates currently set forth in the approved state plan.

6. Premium Requirements **Section 1902(a)(14)
In so far as it incorporates
Section 1916**

To permit Vermont to impose premiums in excess of statutory limits for optional populations and for children through age 18 with income above 195 percent of the Federal poverty level (FPL) as reflected in the Special Terms and Conditions.

7. Income/Resource Comparability **Section 1902(a)(17)**

To the extent necessary to enable the state to use varying income and resource standards and methods for plan groups and individuals.

8. Spend-Down

Section 1902(a)(17)

To enable the state to offer one-month spend-downs for medically needy people receiving community-based services as an alternative to institutionalization, and non-institutionalized persons who are receiving personal care attendant services at the onset of waivers.

9. Financial Responsibility/Deeming

Section 1902(a)(17)(D)

To the extent necessary to exempt the state from the limits under section 1902(a)(17)(D) on whose income and resources may be used to determine eligibility unless actually made available, and so that family income and resources may be used instead.

To enable the state to disregard quarterly income totaling less than \$20 from the post-eligibility income determination.

10. Freedom of Choice

Section 1902(a)(23)(A)

To enable the state to restrict freedom of choice of provider for the demonstration participants to the extent that beneficiaries will be restricted to providers enrolled in a provider network through the Department of Vermont Health Access (DVHA) for the type of service at issue, but may change providers among those enrolled providers. Freedom of choice of provider may not be restricted for family planning providers.

11. Direct Payments to Providers

Section 1902(a)(32)

To permit payments for incidental purchases for Choices for Care HCBS to be made directly to beneficiaries or their representatives.

CENTERS FOR MEDICARE & MEDICAID SERVICES

EXPENDITURE AUTHORITY

NUMBER: 11-W-00194/1

TITLE: Global Commitment to Health Section 1115 Demonstration

AWARDEE: Vermont Agency of Human Services (AHS)

Under the authority of Section 1115(a)(2) of the Social Security Act (the Act), expenditures made by Vermont for the items identified below (which are not otherwise included as expenditures under section 1903 of the Act) shall, for the period of this demonstration extension, beginning January 1, 2017 through December 31, 2021, unless otherwise specified, be regarded as expenditures under the state's Medicaid Title XIX plan. These expenditure authorities are granted to enable the state to operate its Global Commitment to Health Section 1115 Demonstration and may only be implemented consistent with the approved Special Terms and Conditions (STCs) set forth in the accompanying document.

All requirements of the Medicaid program expressed in federal law, regulation and policy statements not expressly waived or identified as not applicable to these expenditure authorities, shall apply to the Global Commitment to Health demonstration for the period of this demonstration extension.

These expenditure authorities promote the objectives of title XIX in the following ways:

- Increase and strengthen overall coverage of low-income individuals in the state;
 - Increase access to, stabilize, and strengthen providers and provider networks available to serve Medicaid and low-income individuals in the state;
 - Improve health outcomes for Medicaid and other low-income populations in the state; and
 - Increase efficiency and quality of care for Medicaid and other low-income populations through initiatives to transform service delivery networks.
1. Expenditures Related to Eligibility Expansion. Expenditures to provide Medicaid coverage to the following demonstration populations that are not covered under the Medicaid state plan and are enrolled in the Vermont Global Commitment to Health demonstration. (Note: demonstration populations 1, 2, and 3, which are described in the demonstration's special terms and conditions, are covered under the Medicaid state plan.)
 - a. **Demonstration Population 4: Highest Need:** Expenditures for 217-like individuals receiving Home and Community-Based Waiver (HCBW)-like services who meet the clinical standard of need for the highest need group and Program of All-Inclusive Care for the Elderly (PACE) like participants who meet the clinical standards for the highest need group.

- b. **Demonstration Population 5: High Need:** Expenditures for 217-like individuals receiving HCBW-like services in the High Need Group and PACE-like participants who meet the clinical standards for the High Need Group.
 - c. **Demonstration Population 6: Moderate Needs Group (Expansion Group):** Expenditures for a small subset of HCBW-like services for individuals who are not otherwise eligible under the Medicaid state plan and who would not have been eligible had the state elected eligibility under 42 CFR 435.217, but are at risk for institutionalization and are in need of home and community-based services. Such individuals may have income up to 300 percent of the SSI/Federal Benefit Rate (FBR) and resources below \$10,000. Individuals with income below the limit and with excess resources may apply excess resources to income, up to the income limit. These benefits do not meet the requirements of Minimum Essential Coverage.
 - d. **Demonstration Population 7:** Medicare beneficiaries with income at or below 150 percent of the Federal poverty level (FPL), who may be enrolled in the Medicare Savings Program (MSP) but are not otherwise eligible for full benefits.
 - e. **Demonstration Population 8:** Medicare beneficiaries with income above 150 percent and up to and including 225 percent of the FPL, who may be enrolled in the MSP, but are not otherwise categorically eligible for full benefits.
2. **Expenditures Related to Additional Services.** Expenditures for additional health care related-services described in STC 20(c) for all populations affected by or eligible through the demonstration.
3. **Expenditures for Public Health Initiatives, Outreach, Infrastructure, and Services Related to State Plan, Demonstration, Uninsured, and Underinsured Populations.** Expenditures to support the goal of providing state-funded health care programs to improve the access and quality of health care services available to uninsured and underinsured individuals in Vermont subject to the terms and limitations set forward in STCs 83 and 84 and up to a maximum of the limits set in STC 85 (and which cannot be rolled over to the next demonstration year (DY)); to reduce the rate of uninsured and underinsured in Vermont, increase access to quality health care for uninsured, underinsured, and Medicaid beneficiaries, provide public health approaches and other innovative programs to improve the health outcomes and quality of life for Medicaid beneficiaries; and encourage the formation and maintenance of public-private partnerships in health care including initiatives to support and improve the health care delivery system and promote transformation to value-based and integrated models of care.
4. **Expenditures for Hospice Services that Exceed State Plan Limits.** Expenditures for adults eligible under the approved state plan for hospice services that exceed state plan limits.

5. **Expenditures for the Marketplace Subsidy Program.** Expenditures for state funded subsidy programs that provide assistance to certain individuals who purchase health insurance through the Marketplace.
6. **Expenditures for Services for Individually Assessed Cost Effective Alternate Services.** Expenditures for direct health care services or other services furnished as alternatives to covered services when the state and treating health care professionals have made an assessment and determination that the service is a medically appropriate and cost effective substitute for the corresponding state plan service or setting.
7. **Expenditures for Mental Health Community Rehabilitation and Treatment (CRT) Services.** Expenditures for mental health community rehabilitation and treatment (CRT) services, as defined by Vermont rule and policy, provided through a state-funded program to individuals with severe and persistent mental illness who have incomes above 133 percent of the FPL and up to and including 185 percent of FPL who are not otherwise Medicaid enrolled.
8. **HCBW-like Services for State Plan Eligibles Who Meet Highest Need, High Need or Moderate Needs Clinical Criteria.** Expenditures for HCBW-like services for State plan eligibles who meet all State plan eligibility requirements, who have the indicated level of clinical need for HCBW-like services. The Moderate Needs Group do not meet all the Choices for Care clinical criteria for long-term services, but are at risk of institutionalization. These individuals demonstrate a clinical need that shows they would benefit from a subset of HCBW-like services.
9. **Other Choices for Care Expenditures:**
 - a. Expenditures for Choices for Care participants with resources exceeding current limits, who are single, own and reside in their own homes, and select home based care rather than nursing facility care, to allow them to retain resources to remain in the community;
 - b. Expenditures for personal care services provided by Choices for Care participants spouses; and
 - c. Expenditures for incidental purchases paid in cash allowances to participants who are self-directing their services prior to service delivery.
10. **Full Medicaid Benefits for Presumptively Eligible Pregnant Women.** Expenditures to provide full Medicaid State plan benefits to presumptively eligible pregnant women.

11. Residential and Inpatient Treatment for Individuals with Substance Use Disorder (SUD). Effective July 1, 2018, expenditures for otherwise covered 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).

12. Residential and Inpatient Treatment for Individuals with Serious Mental Illness. Expenditures for Medicaid state plan services—furnished to eligible individuals who are primarily receiving short-term treatment for a serious mental illness (SMI) in facilities that meet the definition of an IMD.

Title XIX Requirements not Applicable to Demonstration Expenditure Authorities (Populations 6, 7, and 8)

13. Retroactive Eligibility

Section 1902(a)(34)

To enable the state to waive the requirement to provide medical assistance for up to 3 months prior to the date that an application for assistance is made for expansion groups.

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

NUMBER: 11-W-00194/1

TITLE: Global Commitment to Health Section 1115 Demonstration

AWARDEE: Vermont Agency of Human Services (AHS)

I. PREFACE

The following are the Special Terms and Conditions (STCs) for the Vermont Global Commitment to Health Section 1115(a) Medicaid Demonstration (hereinafter “demonstration”). The parties to this agreement are the Vermont Agency of Human Services (AHS, state) and the Centers for Medicare & Medicaid Services (CMS). The STCs set forth limitations on the extent of the waivers and expenditure authorities that have been granted to further the demonstration, which are enumerated in separate lists. The STCs also detail the nature, character, and extent of Federal involvement in the demonstration and the state’s obligations to CMS during the life of the demonstration. These STC’s are effective as of January 1, 2017 through December 31, 2021 unless otherwise specified. All previously approved STCs, waivers, and expenditure authorities are superseded by the STCs set forth below.

The amended STCs have been arranged into the following subject areas:

- I. Preface
- II. Program Description and Objectives
- III. General Program Requirements
- IV. Eligibility, Benefits, and Enrollment
- V. Cost Sharing
- VI. Delivery Systems
- VII. Long-Term Services and Supports Protections for Choices for Care
- VIII. Designated State Health Programs
- IX. Monitoring and Reporting Requirements
- X. General Financial Requirements
- XI. Monitoring Budget Neutrality for the Demonstration
- XII. Evaluation of the Demonstration
- XIII. Use of Demonstration Funds
- XIV. Measurement of Quality of Care and Access to Care
- XV. Opioid Use Disorder (OUD)/Substance Use Disorder (SUD)
- XVI. Serious Mental Illness (SMI) and Serious Emotional Disturbance (SED)
- XVII. Schedule of State Deliverables for the Demonstration Period

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

Attachment A. Quarterly Report Content and Format
Attachment B. Summary of Choices for Care Eligibility Criteria
Attachment C. Choices for Care Services by Demonstration Group
Attachment D. Choices for Care Long-Term Services and Supports Definitions
Attachment E. Global Commitment Specialized Program Service Definitions
Attachment F. Choices for Care Wait List Procedure Description
Attachment G. Premiums and Co-Payments for Demonstration Populations
Attachment H. List of Approved Investments
Attachment I. Menu of Delivery System Investments
Attachment J. Investment Application Template
Attachment K. Evaluation Design
Attachment L. DSHP Claiming Protocol [RESERVED]
Attachment M. Investment Claiming Protocol [RESERVED]
Attachment N. SUD Implementation Protocol
Attachment O. SUD Monitoring Protocol
Attachment P. SMI/SED Implementation Plan
Attachment Q. SMI/SED Monitoring Protocol

II. PROGRAM DESCRIPTION AND OBJECTIVES

The demonstration was initiated in September 2005, and is designed to use a multi-disciplinary approach including the basic principles of public health, the fundamentals of effective administration of a Medicaid managed care delivery system, public-private partnership, and program flexibility. In December 2019, the demonstration was amended to provide expenditure authority for services provided to Medicaid beneficiaries with serious mental illness (SMI) or serious emotional disturbance (SED) in residential and inpatient settings that qualify as institutions for mental diseases (IMD), as described in the CMS November 2018 State Medicaid Director's Letter. The goal of this demonstration amendment is for the State to maintain and enhance access to mental health services and continue delivery system improvements to provide more coordinated and comprehensive treatment of Medicaid beneficiaries with SMI or SED.

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

1. Reduced utilization and lengths of stay in emergency departments among Medicaid beneficiaries with SMI or SED while awaiting mental health treatment in specialized settings;
2. Reduced preventable readmissions to acute care hospitals and residential settings;
3. Improved availability of crisis stabilization services including services made available through call centers and mobile crisis units, intensive outpatient services, as well as services provided during acute short-term stays in residential crisis stabilization programs and psychiatric hospitals and residential treatment settings throughout the state;

4. Improved access to community-based services to address the chronic mental health care needs of beneficiaries with SMI or SED including through increased integration of primary and behavioral health care; and
5. Improved care coordination, especially continuity of care in the community following episodes of acute care in hospitals and residential treatment facilities.

In June 2018, the demonstration was amended to include Opioid Use Disorder (OUD), other Substance Use Disorder (SUD) and recovery services through covering Medication-Assisted Treatment (MAT). This demonstration will provide the state with authority to provide high-quality, clinically appropriate SUD treatment services for short-term residents in residential and inpatient treatment settings that qualify as an IMD. This amendment ensures the availability of treatment supports that effectively prevent and treat opioid use disorder and other substance use disorders, and promote a comprehensive and integrated continuum of mental and physical health, OUD and SUD treatment, and long-term services and supports for all Vermonters receiving Medicaid services. Under this demonstration these services would allow the state to provide higher levels of care, timely access, as well as enhance the state's overall comprehensive and evidence-based MAT program.

As of January 1, 2017 Vermont extended the demonstration to further promote delivery system and payment reform to meet the goals of the state working with the Center for Medicaid and CHIP Services and the Center for Medicare and Medicaid Innovation (CMMI) consistent with Medicare's payment reform efforts in order to allow for alignment across public payers. Specifically, Vermont expects to demonstrate its ability to achieve universal access to health care, cost containment, and improved quality of care.

Since 2005, the demonstration has helped reduce Vermont's uninsured rate from 11.4 percent in 2005 to approximately 2.7 percent in 2015 through expansion of eligibility. The demonstration has also enabled Vermont to address and eliminate the bias toward institutional care and offer cost-effective, community-based services. For example, the proportion of Choices for Care participants served in the community has passed fifty percent and continues to increase. In addition, Vermont no longer has a waiting list for individuals in the Highest and High Need Groups under the Choices for Care component of the demonstration.

While expansion of eligibility is no longer the primary focus of the demonstration, in light of the expansion of eligibility under the state plan pursuant to the Affordable Care Act, the demonstration continues to promote delivery system reform and cost-effective community-based services as an alternative to institutional services. The state's goal in implementing the demonstration is to improve the health status of all Vermonters by:

- Promoting delivery system reform through value based payment models and alignment across public payers;
- Increasing access to affordable and high quality health care by assisting lower-income

- individuals who can qualify for private insurance through the Marketplace;
- Improving access to primary care;
- Improving health care delivery for individuals with chronic care needs; and
- Allowing beneficiaries a choice in long-term services and supports and providing an array of home and community-based alternatives recognized to be more cost-effective than institutional based supports.

The state will employ four major elements in achieving the above goals:

1. *Program Flexibility:* Vermont has the flexibility to invest in certain specified alternative services and programs designed to achieve the demonstration's objectives (including the Marketplace subsidy program);
2. *Managed Care Delivery System:* Under the demonstration the Agency for Human Services (AHS) will enter into an agreement with the Department of Vermont Health Access (DVHA), which will deliver services through a managed care-like model, subject to the requirements that would be applicable to a non-risk pre-paid inpatient health plan (PIHP) as defined in STC 24;
3. *Removal of Institutional Bias:* Under the demonstration, Vermont will provide a choice of settings for delivery of services and supports to older adults, people with severe and persistent mental illness, people with physical disabilities, people with developmental disabilities, and people with traumatic brain injuries who meet program eligibility and level of care requirements; and
4. *Delivery System Reform:* Under the demonstration, Vermont will support systemic delivery reform efforts using the payment flexibility provided through the demonstration to create alignment across public and private payers.

Over the demonstration period, the state, in addition to the overall demonstration goals, will include the following six new goals to support the substance use disorder (SUD) program.

1. Increased rates of identification initiation, and engagement in treatment;
2. Increase adherence to and retention in treatment;
3. Reductions in overdose deaths, particularly those due to opioids;
4. Reduced utilization of emergency department and inpatient hospital settings for treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services;
5. Fewer readmissions to the same or higher level of care where the readmission is preventable or medically inappropriate; and
6. Improved access to care for physical health conditions among beneficiaries.

The initial Global Commitment to Health and Choices for Care demonstrations were approved in September of 2005, effective October 1, 2005. The Global Commitment to Health demonstration was extended for 3 years, effective January 1, 2011, and again for 3 years, effective October 2, 2013. The Choices for Care demonstration was extended for 5 years, effective October 1, 2010, and became part of the Global Commitment to Health demonstration in January 2015. The following amendments have been made to the Global Commitment to Health demonstration:

- 2007: A component of the Catamount Health program was added, enabling the state to provide a premium subsidy to Vermonters who had been without health insurance coverage for a year or more, have income at or below 200 percent of the FPL, and who do not have access to cost-effective employer-sponsored insurance, as determined by the state.
- 2009: The state extended Catamount Health coverage to Vermonters at or below 300 percent of the FPL.
- 2011: The state included a palliative care program for children who are at or below 300 percent of the FPL and have been diagnosed with life-limiting illness that would preclude them from reaching adulthood. This program allows children to receive curative and palliative care services such as expressive therapy, care coordination, family training and respite for caregivers.
- 2012: CMS provided authority for the state to eliminate the \$75 inpatient admission co-pay and to implement nominal co-payments for the Vermont Health Access Plan (VHAP) as articulated in the Medicaid state plan.
- 2013: CMS approved the extension of the Global Commitment to Health demonstration which included sun-setting the authorities for most of the Expansion Populations, including Catamount Health coverage, because these populations would be eligible for Marketplace coverage beginning January 1, 2014. The extension also added the New Adult Group under the state plan to the population affected by the demonstration effective January 1, 2014. Finally, the extension also included premium subsidies for individuals enrolled in a qualified health plan whose income is at or below 300 percent of the FPL.
- 2015: In January 2015, the Global Commitment to Health demonstration was amended to include authority for the former Choices for Care demonstration. In addition, the state received section 1115 authority to provide full Medicaid state plan benefits to pregnant women who are determined presumptively eligible.

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 Law, Regulation, and Policy.** All requirements of the Medicaid program expressed in federal law, regulation, and policy statement not expressly waived or identified as not applicable in the waiver or expenditure authority document (which is a part of these STCs), must apply to the demonstration.
3. **Changes in Medicaid Law, Regulation, and Policy.** The state must, within the timeframes specified in the applicable federal law, regulation, court order, or policy directive, come into compliance with any changes in federal law, regulation, or policy affecting the Medicaid program 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 as needed to align with the applicable Medicaid law, regulation, or policy without requiring the state to submit an amendment to the demonstration under STC 7. CMS will notify the state 30 business days in advance of its intent to amend these STCs as necessary to align with the applicable Medicaid law, regulation, or policy. Changes will be considered effective as of the date of the issuance of the CMS approval letter.
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 and/or allotment neutrality worksheet for the demonstration 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 of this section) 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 is not required to submit title XIX state plan amendments for changes to demonstration-eligible populations covered solely through the demonstration. If a population covered through the Medicaid state plan is affected by a change to the demonstration, a conforming amendment to the appropriate state plan may be required, except as otherwise noted in these STCs. Reimbursement of providers will not be limited to reimbursement described in the state plan.
6. **Changes Subject to the Amendment Process.** Demonstration 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 as set forth in STC 7 below. All demonstration 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 demonstration or to the Medicaid State Plan if applicable. 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 in writing for approval no later than 120 days 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 failure by the state to submit required reports and other deliverables in a timely fashion 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 14. 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 that 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 though the 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 result of the proposed amendment which isolates (by Eligibility Group) the impact of the amendment;
8. **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 plan for a 30-day public comment period. In addition, the state must

conduct tribal consultation in accordance with the requirements of STC 14, if applicable. Once the 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 eligibility prior to the termination of the demonstration of the demonstration for the affected beneficiaries, and ensure ongoing coverage for those beneficiaries whether currently enrolled or determined to be eligible individuals, as well as any community outreach activities, including community resources that are available.
- c. 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 14 days after CMS approval of the phase-out plan.
- d. 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 §431.416(g): CMS may expedite or waive 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 6 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 suspended by the state, FFP shall 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 participants.
9. **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 42 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 a phase-out plan consistent with the requirements of STC 8.
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 or 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. **Finding of Non-Compliance.** The state does not relinquish either its rights to challenge any CMS finding that the state materially failed to comply, or to request reconsideration or appeal of any disallowance pursuant to section 1116(e) of the Act.
12. **Adequacy of Infrastructure.** The state must 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.
13. **Public Notice, Tribal Consultation, and Consultation with Interested Parties.** The state must comply with the state notice procedures as required in 42 CFR §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 contained in the state's approved Medicaid State Plan, when any program changes to the demonstration, either through amendment as set out in STC 6 or extension, are proposed by the state.

- 14. Dual Role of Managed Care-Like Model and Compliance with Managed Care Regulations.** For purposes of the demonstration the state shall comply with all of the managed care regulations published at 42 CFR section Part 438 et. seq., except as expressly modified or identified as not applicable in the STCs. DVHA shall continue to serve as the unit designated by AHS (the Single State Agency) responsible for administration of the state Medicaid program and operates as a public managed care model solely to carry out the goals and purposes of the demonstration. DVHA's role under the demonstration as a public managed care model does not reduce or diminish its authority to operate as the designated Medicaid unit under the approved state plan, including its authority to implement program policies permissible under a state plan and establish provider participation requirements. DVHA shall comply with federal program integrity and audit requirements as if it were a non-risk pre-paid inpatient health plan (PIHP) for services and populations covered under the demonstration in accordance with STC 24.
- 15. Federal Financial Participation (FFP).** No federal matching for expenditures for this demonstration will take effect until the effective date identified in the demonstration approval letter, or at a later date if so identified elsewhere in these STCs or in the list of waiver and expenditure authorities.
- 16. 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, managed care organizations (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.
- 17. Common Rule Exemption.** Vermont 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, BENEFITS, AND ENROLLMENT

The Global Commitment to Health demonstration includes the following fundamental elements: program flexibility; a health care delivery system administered by the state and modeled after a managed care delivery system; comprehensive and person-centered services; and choice in long-term services and supports.

18. Populations Affected and Eligible under the Demonstration.

- a. **Generally:** The populations listed in the tables below will receive coverage through the Global Commitment to Health demonstration service delivery system.
- b. **State plan groups:** Coverage for mandatory and optional state plan groups described below are subject to all applicable Medicaid laws and regulations, except as expressly waived in these STCs and the waiver list and expenditure authority for this demonstration. Any Medicaid State Plan Amendments to the eligibility standards and methodologies for these eligibility groups, including the conversion to a modified adjusted gross income standard on January 1, 2014, will apply to this demonstration.
- c. **Choices for Care Program Eligibility:** Individuals who receive long-term services and supports under the Choices for Care program must meet state plan financial rules and clinical eligibility criteria as defined by state regulation in effect as of February 9, 2009. These clinical eligibility determinations define highest, high, and moderate needs service groups. See Attachment B for a summary of eligibility definitions, services, and policies. Non-state plan eligible Choices for Care individuals are included in Populations 4, 5, and 6 in the table below.
- d. **Other Demonstration Expansion Populations:** Coverage for these populations is subject to Medicaid laws or regulations only as specified in the expenditure authorities for this demonstration.

The general categories of populations affected, or made eligible, by the demonstration are:

Mandatory and Optional State Plan Groups		
<i>Population number</i>	<i>Population description</i>	<i>Benefits</i>
Population 1	Mandatory state plan populations, except for the Affordable Care Act new adult group (included in population 3) and Medicare Savings Program beneficiaries (included in populations 7 and 8).	Benefits as described in the title XIX state plan and these STCs.
Population 2	Optional state plan populations (including medically needy)	Benefits as described in the title XIX state plan and these STCs.

Mandatory and Optional State Plan Groups		
<i>Population number</i>	<i>Population description</i>	<i>Benefits</i>
Population 3	The new adult group, described in 1902(a)(10)(A)(i)(VIII) and 42 CFR 435.119, pursuant to the approved state plan.	Benefits as described in approved alternative benefit plan state plan amendment and these STCs.
Demonstration Expansion Populations		
<i>Demonstration population number</i>	<i>Population description</i>	<i>Benefits</i>
Population 4	Individuals age 65 and older and age 21 and older with disabilities, not otherwise eligible under the state plan, who meet the clinical criteria for the highest need group, and who would have been Medicaid-eligible under section 1902(a)(10)(A)(ii)(VI) of the Act and 42 CFR §435.217, in conjunction with section 1902(a)(10)(A)(ii)(V) of the Act, if the services they receive under the demonstration would have been provided under an HCBS waiver granted to the state under section 1915(c) of the Act prior to 2014. This includes the application of the post eligibility rules specified at 42 CFR §435.726, and of the spousal impoverishment rules specified at 1924 of the Act, with a resource standard of \$10,000. This only applies to unmarried individuals who have an ownership interest in their principal residence.	Benefits as described in the Medicaid state plan and HCBS benefits described in these STCs.

Demonstration Expansion Populations		
<i>Demonstration population</i>	<i>Population description</i>	<i>Benefits</i>
Population 5	Individuals age 65 and older and age 21 and older with disabilities, not otherwise eligible under the state plan, who meet the clinical criteria for the high need group, and who would have been Medicaid-eligible under section 1902(a)(10)(A)(ii)(VI) of the Act and 42 CFR §435.217, in conjunction with section 1902(a)(10)(A)(ii)(V) of the Act, if the services they receive under the demonstration would have been provided under an HCBS waiver granted to the state under section 1915(c) of the Act prior to 2014. This includes the application of the post eligibility rules specified at 42 CFR 435.726, and of the spousal impoverishment rules specified at 1924 of the Act, and have a resource standard of \$10,000. This only applies to unmarried individuals who have an ownership interest in their principal place of residence.	Benefits as described in the Medicaid state plan and HCBS benefits described in these STCs.
Population 6	Individuals who have incomes below 300 percent of the SSI Federal Benefit rate and would be described in Populations 4 or 5 except that they meet the clinical criteria for the moderate needs group and are at risk of institutionalization.	Limited HCBS including Adult Day Services, Case Management, and Homemaker services. This coverage does not meet the requirements of minimum essential coverage as communicated by CMS in its February 12, 2016 correspondence to the state.

Demonstration Expansion Populations		
<i>Demonstration population</i>	<i>Population description</i>	<i>Benefits</i>
Population 7	Medicare beneficiaries who are 65 years or older or have a disability with income at or below 150 percent of the FPL, who may be enrolled in the Medicare Savings Program (MSP) but are not otherwise categorically eligible for full benefits.	Medicaid prescriptions, eyeglasses and related eye exams; MSP beneficiaries also receive benefits as described in the title XIX state plan.
Population 8	Medicare beneficiaries who are 65 years or older or have a disability with income above 150 percent and up to and including 225 percent of the FPL, who may be enrolled in the MSP, but are not otherwise categorically eligible for full benefits.	Maintenance Drugs (defined as a drug approved by the FDA for continuous use and prescribed to treat a chronic condition for a prolonged period of time of 30 days or longer, and includes insulin, an insulin syringe and an insulin needle). MSP beneficiaries also receive benefits as described in the title XIX state plan.

19. Expansion Eligibility Groups Expenditure and Enrollment Cap. The state must not impose a waiting list or enrollment cap on any Medicaid state plan population for Medicaid state plan services.

- a. A waiting list for enrollment is permitted for individuals eligible only under demonstration authority. If the state establishes a waiting list for services, the waiting list will be limited to coverage of services available only under demonstration authority. The waiting list for services must give priority to individuals who are eligible under the Medicaid state plan.
- b. The state may maintain waiting list policies and procedures for home and community-based services through the Choices for Care Program including a description of how the state will manage wait lists, if and when waiting lists should occur. Waiting list management may include, but not be limited to, consideration of clinical need, other risk factors, eligibility status, date of application, and any regulatory legislative mandates. A description of the wait list policy can be found in Attachment F.

20. Benefits. All covered services may be subject to medical review and prior approval by DVHA based on medical appropriateness. A complete listing of covered services and limitations are contained in the Vermont approved title XIX state plan, Vermont statutes, regulations, and policies and procedures. The Global Commitment to Health demonstration will provide, at a minimum, the benefits covered under the title XIX state plan and these STCs to individuals in populations 1 and 2 and benefits for individuals in population 3 shall be specified in an approved Alternative Benefit plan under the state plan and these STCs.

- a. **Hospice.** The state may provide coverage for hospice services concurrently with palliative and curative services. These concurrent services will be available for adults 21 years of age and older who are in populations 1, 2, and 3 who have been diagnosed with a life-limiting illness that is expected to be terminal, if a physician has certified that the adult is within the last months of life. The number of months of life required for such a certification shall be determined under the state plan. The state must under regular state plan rules provide concurrent hospice services for both palliative and curative services for children under age 21.
- b. **Individually Assessed Cost-Effective Alternative Services.** Vermont may provide individuals with the option to receive cost-effective treatment as patients in lieu of otherwise covered services in other settings. This option must be voluntary with the individual, and must be based on an assessment and determination that the service is a medically appropriate and cost-effective substitute for the corresponding state plan service or setting. The state must not claim any expenditures under this expenditure authority that are otherwise not allowable including, but not limited to, institution for mental diseases (IMD), inmates, or room and board.
- c. **Special programs.** In addition to the services described in subparagraph (a), the state shall provide the following services, through “special programs” to individuals who would have been eligible under a separate 1915(c) waiver or the state’s prior 1115 demonstration. Service definitions for these programs are included in Attachment E.

Special Program Name	Services	Limitations
Traumatic Brain Injury (TBI)	HCBS waiver-like services including crisis/support services, psychological and counseling supports, case management, community supports, habilitation, respite care, supported employment, environmental and assistive technology and self-directed care.	Any limitation on this service is defined by Vermont rules and policies.

Special Program Name	Services	Limitations
Mental Illness Under 22	HCBS waiver-like services including service coordination, flexible support, skilled therapy services, environmental safety devices, counseling, residential treatment, respite, supported employment, and crisis and community supports.	Any limitation on this service is defined by Vermont rules and policies.
Community Rehabilitation and Treatment	HCBS waiver-like services including service coordination, flexible support, skilled therapy services, environmental safety devices, counseling, residential treatment, respite, supported employment, and crisis and community supports.	Any limitation on this service is defined by Vermont rules and policies.
Developmental Disability Services	HCBS waiver-like services, including service coordination, residential habilitation, day habilitation, supported employment, crisis services, clinical intervention, respite and self-directed care.	Any limitation on this service is defined by Vermont rules and policies.

d. **Palliative Care Program.** The Palliative Care Program is for children under the age of 21 years in populations 1, 2, and 3 who have been diagnosed with a life-limiting illness that is expected to be terminal before adulthood. The program will allow for children to receive palliative and curative services.

i. **Participation.** Demonstration participants will be identified based on diagnostic codes found on claims data and referrals from medical professionals.

1. Eligibility will be determined by the nurse care manager and/or DVHA Medical Director, based on the assessment tool and supplemental clinical information (as needed). Continued eligibility will be re-assessed at least annually.
2. Care planning activities for children enrolled in the palliative care program will meet the requirements specified in federal managed care regulations for enrollees with special health care needs.

ii. **Benefits.** In addition to state plan services, children enrolled in the palliative care program may also receive care and services that meet the definition of ‘medical assistance’ contained in section 1905(a) of the Act if determined to be medically appropriate in the child’s care plan.

1. **Care Coordination.** Development and implementation of a family-centered care plan that includes telephonic and home visits by a licensed nurse.
2. **Respite Care.** Short-term relief for caretaker relatives from the demanding responsibilities for caring for a sick child.
3. **Expressive Therapies.** Therapies provided by licensed therapists to provide support to the child to help the child to creatively and kinesthetically express their reaction to their illness. The palliative care program offers 52 hours of expressive therapies per year. Additional expressive therapy may be authorized if medically appropriate.
4. **Family Training.** Training to teach family members palliative care principles, medical treatment regimen, use of medical equipment, and how to provide in-home care.
5. **Bereavement Counseling.** Anticipatory counseling and up to 6 months after the child's death for the family by a licensed professional trained in grief counseling. Payment for bereavement counseling services may be provided for on-going counseling to family members after the child's death so long as such services were initiated prior to the child's death.

iii. **Cost Sharing.** Cost sharing requirements as described in STC 21 will apply.

V. COST SHARING

21. Premiums and Cost Sharing.

a. Populations 1, 2, and 3.

- i. Premiums for populations 1, 2, and 3, must be in compliance with Medicaid requirements that are set forth in statute, regulation and policy. Premiums may be charged for this population in accordance with the approved state plan.
- ii. Cost sharing for populations 1, 2, and 3, must be in compliance with Medicaid requirements that are set forth in statute, regulation and policies. Standard Medicaid exemptions from cost-sharing set forth in 42 CFR 447(b) applies to the demonstration.

- b. **Populations 7 and 8.** Detailed cost-sharing and premium requirements for Populations 7 and 8 are included in Attachment G. The state must not apply co-payment requirements to excluded populations (children under age 21, pregnant women or individuals in long-term care facilities) or for excluded services/supplies (e.g., family planning).

- c. Premiums for children through age 18 with income above 195 percent of the FPL through 312 percent of the FPL are outlined in Attachment G.

VI. DELIVERY SYSTEMS

- 22. **Delivery System Overview.** Costs of all Medicaid covered services will be covered by DVHA and may be furnished through contracts with providers and through interagency agreements with governmental partners. Contracts with providers may include capitated contracts that meet the requirements of 42 CFR Part 438. In addition, DVHA will operate on a managed care-like model applying utilization controls and care management. The managed care-like model shall comply with federal regulations at 42 CFR Part 438 that would be applicable to a non-risk PIHP, including beneficiary rights and appeal/grievance procedures (unless specifically stated otherwise in the STCs). Requirements under the demonstration shall be documented through an interagency agreement between AHS and DVHA.
- 23. **Submission of Interagency Agreement and Rate Certification.** At least 90 days prior to the effective date of the interagency agreement, AHS shall submit for CMS review and approval the interagency agreement and corresponding rate certification as described in 42 CFR 438.7 and these STCs. Any amendments to the interagency agreement and corresponding amendments to the rate certification shall be submitted for CMS review and approval 45 days prior to the effective date of amendment to the interagency agreement.
- 24. **Managed Care-Like Model – Designated Non-Risk PIHP.** The managed care-like model shall be subject to 42 CFR 438 requirements as a non-risk PIHP, and AHS shall be subject to 42 CFR 438 requirements as the state, and DVHA shall be subject to 42 CFR 438 requirements as a non-risk PIHP subject to the following clarifications:
 - a. AHS shall develop a per member per month (PMPM) capitation rate consistent with the requirements for actuarial soundness, rate development, special contract provisions (as applicable), and rate certifications in 42 CFR 438.4 through 438.7; The PMPM capitation rates shall not be used for determination of federal financial participation, rather the PMPM capitation rates and corresponding rate certification shall be used to determine that:
 - i. The provider reimbursement rates are not based on the rate of federal financial participation associated with the covered populations;
 - ii. The provider reimbursement rates are appropriate for the populations to be covered and the services to be furnished under the contract; and
 - iii. The provider reimbursement rates are adequate to meet the requirements on MCOs, PIHPs, and PAHPs in §§438.206, 438.207, and 438.208;
 - b. DVHA shall calculate and report a Medical Loss Ratio. The MLR shall be calculated consistent with all applicable parts of 42 CFR 438.8;

- c. Neither the capitation rates determined under the interagency agreement nor the underlying provider payments shall be subject to the upper payment limits specified in 42 CFR 447.362; and
- d. AHS will be responsible for oversight of the managed care-like model acting as a non-risk PIHP, ensuring compliance with state and federal statutes, regulations, special terms and conditions, waiver, and expenditure authority. AHS shall be responsible for evaluation, interpretation and enforcement of findings issued by the external quality review organization.
- e. During periods of a public health emergency (PHE), as declared by the Secretary of Health and Human Services as a result of a Presidential declaration under the Stafford Act, the non-risk PIHP (DVHA) is not required to offer in person opportunities for beneficiaries to present evidence and testimony and make legal and factual arguments as described in 42 CFR 438.406(b)(4). However, the non-risk PIHP (DVHA) must provide enrollees reasonable opportunity, in writing, telephonically, and video or virtual communication, to present evidence and testimony and make legal factual arguments. Monitoring and Evaluation requirements for this authority are described in STCs 74a and 78.

25. Capitation Rate Development. In addition to the requirements described in STC 24, the development of the capitation rate must:

- a. Be developed consistent with the requirements in 42 CFR 438.5 and based on DVHA’s actual experience and expected costs;
- b. Be developed for 12 month periods (Note: The first contract under the extension STCs will be for the period April 1, 2017 through December 31, 2017, which is 9 months.);
- c. Not include any administrative services and costs that are required to be incurred by AHS as the Single State Agency under federal law, regulation, or these STCs. Such administrative services and costs that cannot be part of the capitation rate include: eligibility determinations, Single State Agency Central Office and External Quality Review Organization (EQRO), administration of a State Fair Hearing system, the Beneficiary Support System in 42 CFR 438.71 and STC 31, and the provider screening and enrollment process under 42 CFR 438.602(b);
- d. Include only costs for services included under 42 CFR 438.3(c)(1)(ii);
- e. Not include any costs for “investments” as described in STC 85;
- f. AHS shall require DVHA through its interagency agreement to maintain an 85 percent medical loss ratio calculated consistent with 42 CFR 438.8 and these STCs;

- g. To the extent that DVHA does not meet at least an 85 percent medical loss ratio, the PMPM capitation rates must be reduced to the extent necessary to achieve an 85 percent medical loss ratio;
- h. DVHA shall not be eligible for an incentive payment above the actuarial sound capitation rate under 438.6(b); and
- i. AHS shall be required to comply with 42 CFR 438.6(c) and (d), in that:
 - i. Neither AHS, nor DVHA, shall make any pass-through payments, as defined in 42 CFR 438.6(a) to providers;
 - ii. Any reimbursement arrangements between DVHA and providers that is based entirely on a fee-for-service style of fee schedule, consistent with the fee schedule described in 42 CFR 438.6(c)(1)(iii), shall not require AHS to obtain prior approval under 42 CFR 438.6(c)(2);
 - iii. Any reimbursement arrangements between AHS or DVHA and providers that is not a fee-for-service style fee schedule shall be required to meet the prior approval requirements in 42 CFR 438.6(c)(2) for reimbursement arrangements described in 42 CFR 438.6(c)(1)(i) and (ii);
 - iv. AHS is required to obtain prior approval under 42 CFR 438.6(c)(2) for all reimbursement methodologies that are not fee-for-service regardless of whether the reimbursement methodology is included explicitly in the interagency agreement or instituted at DVHA's discretion; and
 - v. Fee-for-service (FFS) for the purposes of this STC means any payment system where:
 - 1. The provider's services are described in terms of "X units of services" where the units of the services are appropriate for the type of service and consistent with units prescribed in national coding standards.
 - 2. The provider's services are reimbursed at a specific reimbursement rate per unit of service, regardless of how the specific reimbursement rate is determined (e.g. fixed dollar amount, Diagnostic-Related Group (DRG), All Patients Refined Diagnostic Related-Group (APR-DRG), or Prospective Payment System (PPS) rates such as Federally Qualified Health Center (FQHC) or Indian Health Service (IHS) rates).
 - 3. The total provider reimbursement is determined by multiplying:
 - a. The provider's "X units of services" delivered to an enrollee; and

- b. The specific reimbursement rate per unit of service.
 - 4. The payment is not for a “bundle of services.”
 - 5. For the purposes of distinguishing the concept of FFS in 42 CFR 438.6(c)(1)(iii) versus a “bundle of services” in 42 CFR 438.6(c)(1)(i), a payment is considered a “bundle of services” when the payment system:
 - a. Pays a single payment for delivering a set of services, whenever the set of services includes covered services across multiple categories of services in §1905 of the Act.
- 26. **Choice under the Managed Care-Like Model.** All Medicaid beneficiaries are enrolled in the managed care-like model that operates as if it were a non-risk PIHP. AHS shall not be subject to 42 CFR 438.52(a)(1). AHS shall be required to meet the requirements of 42 CFR 438.52(b) in all counties regardless of the county designation in the Medicare Advantage Health Services Delivery Reference file.
- 27. **Non-Application of 42 CFR 438.3(m).** AHS and DVHA shall not be determined out of compliance with 42 CFR 438.3(m) if:
 - a. AHS and DVHA meet the financial reporting requirements, consistent with requirements in sections IX and X of these STCs, as well as applicable federal and state accounting principles and controls.
- 28. **Limitation of Freedom of Choice.** Freedom of choice is limited to the DVHA network of providers. However, populations must have freedom of choice when selecting enrolled providers within that network (when applicable, the provider must be enrolled in the specific specialty or subprogram applicable to the services at issue). Specifically, demonstration participants enrolled in a special service program such as, but not limited to, specialized substance abuse and behavioral health services or a program for home and community-based services may only have access to the providers enrolled under that program, and will not have access to every Medicaid-enrolled provider for services under that program. Such participants will have freedom of choice of providers enrolled in the special service program. No restriction on freedom of choice of family planning provider may be imposed.
- 29. **Contracts and Provider Payments.** Payments to providers for Global Commitment will be set by DVHA and approved by AHS and will not be required to comply with the payment provisions in the approved state plan.
 - a. All services provided under the demonstration, including nursing facility and home and community-based services, are included in the actuarially-determined per member per month calculation. Therefore, these payments are subject to the applicable requirements in 42 CFR 438.7.

- b. The state must not make any supplemental payments to providers under the Medicaid state plan.
30. **Contracting with Federally Qualified Health Centers (FQHCs).** The state shall not reduce the number of FQHCs and rural health centers available to provide services to beneficiaries under this demonstration.
31. **Beneficiary Support System.** AHS shall develop and implement a beneficiary support system consistent with the requirements of 42 CFR 438.71. AHS shall ensure the independence and conflict of interest requirements in 42 CFR 438.71(c)(2) are satisfied by ensuring that contracts or grants for these activities are managed by staff outside of DVHA and that staff responsible for any beneficiary support system activities report to a department or agency outside of DVHA. AHS will monitor beneficiary support system quarterly reports and take action where systemic issues are identified with managed long-term supports and services operated by DVHA.
32. **Appeals and Grievance.** AHS and DVHA shall comply with all aspects of 42 CFR 438, subpart F, with AHS as the state and DVHA as if it were a non-risk PIHP. All requirements related to State Fair Hearings in federal statute and regulations shall be the direct responsibility of AHS and may not be delegated to DVHA.
33. **Program Integrity.** AHS and DVHA shall comply with all requirements of 42 CFR 438, subpart H, with AHS as the state and DVHA as a PIHP unless specified herein. All program integrity requirements in federal statute and regulations that are required of the state in its oversight of a non-risk PIHP shall be the direct responsibility of AHS and may not be delegated to DVHA.
- a. 42 CFR 438.604(a)(4) pertaining to documentation against risk of insolvency is not applicable to DVHA.
 - b. The data, information, and documentation submission requirements on DVHA as a non-risk PIHP in 42 CFR 438.604(a)(1) and (a)(2) is satisfied so long as AHS has direct access to the information systems that maintain such data, documentation and information.
34. **Data Sharing.** DVHA acting as a non-risk PIHP under a managed care-like model shall comply with all privacy and confidentiality requirements on PIHPs in 42 CFR 438. Nothing in this STC prohibits AHS from delegating data and information rights and responsibilities to DVHA consistent with federal law, including section 1902(a)(7) of the Act and 42 CFR 431.306(d). To the extent that DVHA has access to data and information under delegation from AHS that may not otherwise be shared with a non-risk PIHP, AHS must establish administrative, managerial and, technical controls to prevent sharing the data with divisions of DVHA responsible for the managed care-like model acting as a non-risk PIHP.

VII. **LONG-TERM SERVICES AND SUPPORTS PROTECTIONS FOR CHOICES FOR CARE**

35. **Person-Centered Planning.** The state agrees to use person-centered planning processes to identify participants' and applicants' long-term service and support needs, the resources available to meet those needs, and to provide access to additional service and support options, such as the choice to use spouse caregivers, and access a prospective monthly cash payment. The state assures that person-centered planning will be in compliance with the characteristics set out in 42 CFR 441.301(c)(1)-(3).
36. **Self-Directed Supports.** The state agrees to provide resources to support participants or their proxies (e.g., a surrogate, parent or legal guardian/representative) in directing their own care. This support assures, but is not limited to, participants' compliance with laws pertaining to employer responsibilities and provision for back-up attendants as needs arise. The state agrees to assure that background checks on employees and their results are available to participants. State policies and guidelines will include, but not be limited to: criteria for who is eligible to self-direct, a fiscal agent/intermediary, and consultants to assist participants with learning their roles and responsibilities as an 'employer' and to ensure that services are consistent with care plan needs and allocations.
- a. Choices for Care program enrollees will have full informed choice on the requirements and options to: self-direct Choices for Care services; have a qualified designated representative direct Choices for Care services on their behalf; or select traditional agency-based service delivery. State and provider staff will receive training on these options.
37. **Participant/Applicant Waiting List Monitoring.** The state agrees to report on the status of the waiting lists for Choices for Care services during regular progress calls between CMS and the state and in reports submitted to CMS by the state.
- a. The state assures that it has a system as well as policies and procedures in place through which the providers must identify, report and investigate critical incidents that occur within the delivery of Choices for Care Long-Term Services and Supports (LTSS). The state also has a system as well as policies and procedures in place through which to prevent, detect report, investigate, and remediate abuse, neglect, and exploitation. Providers and participants are educated about this system. Provider obligations include specific action steps that providers must take in the event of known or suspected abuse, neglect or exploitation. The Vermont policies and procedures are specified in Vermont Statute, 33 V.S.A. Chapter 69, available at: <http://www.leg.state.vt.us/statutes/sections.cfm?Title=33&Chapter=069>.
38. **Home and Community Based Settings.** The state will assure compliance with the characteristics of home and community-based settings in accordance with 42 CFR 441.301(c)(4), for those Choices for Care services (e.g., those not found in the Vermont State

Plan) that could be authorized under 1915(c) and 1915(i). The Choices for Care services are described in Attachment D.

39. **Single State Agency LTSS oversight.** In its role as single state agency, the AHS will ensure a managed LTSS plan for a comprehensive care model is developed that promotes the integration of home and community-based services, institutional, acute, primary and behavioral healthcare.
40. **Choices for Care Enrollee Access.** To support the beneficiary's experience receiving medical assistance and long-term services and supports, the state shall assure that all Choices for Care program enrollees have access to independent support services that assist them in understanding their coverage options and in the resolution of problems regarding services, coverage, access and rights. Independent support services will:
 - a. Operate independently from any provider and to the extent possible, services will be provided independently of the state and support transparent and collaborative resolution of issues between beneficiaries and state government;
 - b. Be easily accessible and available to all Choices for Care enrollees. Activities will be directed toward enrollees in all settings (institutional, residential and community-based), accessible through multiple entryways (e.g., phone, internet, office) and reach out to beneficiaries and/or authorized representatives through various means (mail, phone, in person), as appropriate;
 - c. Assist with access to services and supports and help individuals understand their choices, resolve problems and address concerns that may arise between the individual and a provider or payer. The state will assure:
 - i. Beneficiaries have support in the pre-enrollment stage, such as unbiased options counseling and general program-related information.
 - ii. Beneficiaries have an access point for complaints and concerns about Choices for Care enrollment, access to services, and other related matters.
 - iii. Enrollees understand the fair hearing, grievance, and appeal rights and processes within the Choices for Care program and assist them through the process if needed/requested.
 - iv. Trainings are conducted with providers on community-based resources and covered services and supports.
 - d. Ensure staff and volunteers are knowledgeable. Training will include information about the state's Medicaid programs; beneficiary protections and rights under Medicaid managed care arrangements; and the health and service needs of persons with complex needs, including those with a chronic condition, disability, and cognitive or behavioral needs. In addition, the state will ensure services are delivered

in a culturally competent manner and are accessible to individuals with limited English proficiency; and

- e. Collect and report information on the volume and nature of beneficiary contacts and the resolution of such contacts on a schedule and manner determined by the state, but no less frequently than quarterly. This information will inform the state of any provider or contractor issues and support quarterly reporting requirements to CMS.

VIII. DESIGNATED STATE HEALTH PROGRAMS

41. State-Funded Marketplace Subsidies Program. The state may claim as allowable expenditures under the demonstration the payments made through its state-funded program to provide premium subsidies for individuals up to and including 300 percent of the FPL who purchase health insurance through the Marketplace. Subsidies will be provided on behalf of individuals who: (1) are not Medicaid eligible; (2) are eligible for the advance premium tax credit (APTC); and (3) whose income is up to and including 300 percent of the FPL. Expenditures for this designated state health program (DSHP) must not include any expenditures listed in STC 86 (“Investment Approval Process”). The state must submit a claiming protocol for this DSHP and the protocol will become Attachment L.

- a. Funding Limit. Expenditures for the subsidies are limited on an annual basis as follows (total computable):

	DY 12 CY 2017	DY 13 CY 2018	DY 14 CY 2019	DY 15 CY 2020	DY 16 CY 2021
DSHP – State-funded Exchange Subsidy	\$6,520,640	\$7,172,704	\$7,889,974	\$8,678,971	\$9,546,869

- b. Reporting. The state must provide data regarding the operation of this subsidy program in the annual report required per STC 50. This data must, at a minimum, include:

- i. The number of individuals served by the program;
- ii. The size of the subsidies; and
- iii. A comparison of projected costs with actual costs.

- c. Budget Neutrality. This subsidy program will be subject to the budget neutrality limit.

42. State-Funded Mental Health Community Rehabilitation and Treatment (CRT) Services.

- a. The state may claim as allowable expenditures under the demonstration payments through a state-funded program for CRT services, as defined by Vermont rule and

policy, provided to individuals with severe and persistent mental illness who have incomes above 133 percent of the FPL and up to and including 185 percent of FPL who are not Medicaid enrolled. This program will be subject to the budget neutrality limit. A description of the services can be found in Attachment E: Global Commitment Specialized Program Service Definitions. Expenditures for this DSHP must not include any expenditures listed in STC 86 (“Investment Approval Process”). The state must submit a claiming protocol for this DSHP and the protocol will become Attachment L.

IX. MONITORING AND REPORTING REQUIREMENTS

- 43. Monitoring Calls.** CMS will convene periodic conference calls with the state. The purpose of these calls is to discuss any significant actual or anticipated developments affecting the demonstration, including planning for future changes in the program. CMS will provide updates on any amendments or concept papers under review, as well as federal policies and issues that may affect any aspect of the demonstration. The state and CMS will jointly develop the agenda prior to the calls. Areas to be addressed during the monitoring call include, but are not limited to:
- a. Operations and performance;
 - b. Transition and implementation activities;
 - c. Stakeholder concerns;
 - d. Enrollment;
 - e. Cost sharing;
 - f. Quality of care;
 - g. Beneficiary access;
 - h. Benefit package and wraparound benefits;
 - i. Audits;
 - j. Lawsuits;
 - k. Financial reporting and budget neutrality issues;
 - l. Progress on evaluation activities and contracts;
 - m. Related legislative developments in the state; and
 - n. Any demonstration changes or amendments the state is considering such as the state’s section 1115 SUD demonstration amendment.

- 44. Post-Award Forum.** Pursuant to 42 CFR 431.420(c), within 6 months of the demonstration’s implementation, and annually thereafter, the state shall afford the public with an opportunity to provide meaningful comment on the progress of the demonstration. At least 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 Quarterly Report associated with the quarter in which the forum was held, as well as in its compiled Annual Report.
- 45. Submission of Post-Approval Deliverables.** The state shall submit all required analyses, reports, design documents, presentations, and other items specified in these STCs (“deliverables”). The state shall use the processes stipulated by CMS and within the timeframes outlined within these STCs.
- 46. Compliance with Federal Systems Innovation.** As federal systems continue to evolve and incorporate 1115 waiver reporting and analytics, the state shall work with CMS to revise the reporting templates and submission processes to accommodate timely compliance with the requirements of the new systems. The state will submit the monitoring reports and evaluation reports to the appropriate system as directed by CMS.
- 47. Deferral for Failure to Submit Timely Demonstration Deliverables.** The state agrees that CMS may issue deferrals in the amount of \$5,000,000 (federal share) when deliverables are not submitted timely to CMS or found to not be consistent with the requirements approved by CMS.
- a. Thirty (30) days after the deliverable was due, CMS will issue a written notification to the state providing advance notification of a pending deferral for late or non-compliant submissions of required deliverables.
 - b. For each deliverable, the state may submit a written request for an extension to submit the required deliverable. Should CMS agree to the state’s request, a corresponding extension of the deferral process described below can be provided.
 - i. CMS may agree to a corrective action as an interim step before applying the deferral, if requested by the state.
 - c. The deferral would be issued against the next quarterly expenditure report following the written deferral notification.
 - d. When the state submits the overdue deliverable(s) that are accepted by CMS, 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 may preclude a state from renewing a demonstration or obtaining a new demonstration.

- f. CMS will consider with the state an alternative set of operational steps for implementing the intended deferral to align the process with the state's existing deferral process, for example the structure of the state request for an extension, what quarter the deferral applies to, and how the deferral is released.

48. Cooperation with Federal Evaluators. As required under 42 CFR 431.420(f), should CMS undertake a federal evaluation of the demonstration or any component of the demonstration, the state shall cooperate fully and timely with CMS and its contractors' evaluation activities. 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 shall include in its contracts with entities who collect, produce or maintain data and files for the demonstration, that they shall make such data available for the federal evaluation as is required by the state 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 section IX, STC 47.

49. Cooperation with Federal Learning Collaboration Efforts. The state will cooperate with improvement and learning collaboration efforts by CMS.

50. Quarterly and Annual Monitoring Reports.

- a. The state must submit three (3) Quarterly Reports and one (1) compiled Annual Report each DY. The Quarterly Reports are due no later than sixty (60) days following the end of each demonstration quarter. The compiled Annual Report is due no later than ninety (90) days following the end of the DY.
- b. The Quarterly and Annual Reports shall provide sufficient information for CMS to understand implementation progress of the demonstration including the reports documenting key operational and other 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 reports will include all required elements 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.)
- c. The Quarterly and Annual 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.

- i. Operational Updates – The reports shall provide sufficient information to document key operational and other 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 lawsuits or legal actions; unusual or unanticipated trends; legislative updates; and descriptions of any public forums held.
- ii. Performance Metrics – Progress on any required monitoring and performance metrics must be included in writing in the Quarterly and Annual Reports. Information in the reports will follow the framework provided by CMS and be provided in a structured manner that supports federal tracking and analysis.
- iii. Budget Neutrality and Financial Reporting Requirements – The state must provide an updated budget neutrality workbook with every Quarterly and Annual Report that meets all the reporting requirements for monitoring budget neutrality set forth in the General Financial Requirements section of these STCs, including the submission of corrected budget neutrality data upon request. In addition, the state must report quarterly expenditures associated with the populations affected by this demonstration on the Form CMS-64.
- iv. Evaluation Activities and Interim Findings – 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. The state shall specify for CMS approval a set of performance and outcome metrics and network adequacy, including their specifications, reporting cycles, and level of reporting (e.g., the state, health plan and provider level, and segmentation by population) to support rapid cycles assessment in trends for monitoring and evaluation of the demonstration.
- v. The Annual Report must include all items outlined in STC 50. In addition, the Annual Report must at a minimum include the requirements outlined below:
 1. All items included in the Quarterly Reports must be summarized to reflect the operation/activities throughout the DY;
 2. Total annual expenditures for the demonstration population for each DY, with administrative costs reported separately;
 3. Total contributions, withdrawals, balances, and credits; and
 4. Yearly unduplicated enrollment reports for demonstration enrollees for each DY (enrollees include all individuals enrolled in the demonstration) that include the member months, as required to evaluate compliance with the budget neutrality agreement.

51. **Compliance with Managed Care, Network Adequacy, Quality Strategy and EQR Reporting Requirements.** The state must comply with all managed care reporting regulations at 42 CFR Part §438 et. seq., except as expressly identified as not applicable in the expenditure authorities incorporated into these STCs.
52. **State Data Collection.** The state must collect data and information necessary to oversee service utilization and rate setting by provider/plan, comply with the Core Set of Children’s Health Care Quality Measures for Medicaid and CHIP (Child Core Set) and the Core Set of Adult Health Care Quality Measures for Medicaid (Adult Core Set), collectively referred to as the CMS Child and Adult Core Measure Sets for Medicaid and CHIP, obtain NCQA and other accreditations that the state may seek, and comply with other existing federal measure sets.
- a. The state will use this information in ongoing monitoring of individual well-being, provider/plan performance, and continuous quality improvement efforts, in addition to complying with CMS reporting requirements.
 - b. The state must maintain data dictionary and file layouts of the data collected.
 - c. The raw and edited data will be made available to CMS within 30 days of a written request.

X. GENERAL FINANCIAL REQUIREMENTS

53. **Quarterly Expenditure Reports.** The state must provide quarterly expenditure reports using the form CMS-64 to separately report total expenditures for services provided under the Medicaid program, including those provided through the demonstration under section 1115 authority. This project is approved for expenditures applicable to services rendered during the demonstration period. CMS will provide FFP for allowable demonstration expenditures only as long as they do not exceed the pre-defined limits on the costs incurred as specified in section XI (Monitoring Budget Neutrality for the Demonstration).
54. **Reporting Expenditures Subject to the Budget Neutrality Cap.** In order to track expenditures under this demonstration, Vermont must report demonstration expenditures through the Medicaid and Children’s Health Insurance Program Budget and Expenditure System, following routines from CMS-64 reporting instructions outlined in section 2500 of the State Medicaid Manual. All demonstration expenditures subject to the budget neutrality cap, including baselines and member months, must be reported each quarter on separate Forms CMS-64.9 Waiver and/or 64.9P Waiver, identified by the demonstration project number assigned by CMS (including the project number extension, which indicates the demonstration year in which the expenditure was made). Reporting for expenditures made subsequent to termination of the demonstration must indicate the demonstration year in which services were rendered. Payment adjustments attributable to expenditures under the demonstration must be recorded on the applicable Global Commitment prior quarter waiver form, identified as either CMS-64.9P Waiver (Medical Assistance Payments) or CMS-

64.10P Waiver (Administrative Payments). When populated, these forms read into the CMS-64 Summary sheet, Line 7 for increasing adjustments and Line 10B for decreasing adjustments. Adjustments not attributable to this demonstration should be reported on non-waiver forms, as instructed in the State Medicaid Manual. The term, “expenditures subject to the budget neutrality cap,” is defined in subparagraph (c) below.

- a. For each demonstration year, separate form CMS-64.9 waiver and/or 64.9P waiver reports must be submitted reporting expenditures subject to the budget neutrality cap.

All expenditures subject to the budget neutrality ceiling for demonstration eligibles must be reported. The sum of the expenditures from the separate reports will represent the expenditures subject to the budget neutrality cap (as defined in subparagraph (c) below). Medical expenditures for the new adult group, as described below, are not subject to the demonstration’s budget neutrality cap, but they are subject to a Supplemental Budget Neutrality Test, as defined in STC 65. The Vermont Global Medicaid eligibility groups, for reporting purposes, include the names and definitions described in the table below.

Corresponding Population Number per STC 18 or Expenditure Authority	Reporting Name Description	CMS-64 Reporting Name
Populations 1-2	Report expenditures for individuals eligible as aged, blind, or disabled under the state plan.	<u>“ABD”</u>
	Report the expenditures for all non-ABD children and adults in the state plan mandatory and optional categories, with the exception of adults eligible under population 3.	<u>“non-ABD”</u>
	Report for all expenditures for all non-ABD children and adults in optional categories.	
Population 3	Report for all medical expenditures for the Affordable Care Act new adult group, described in 1902(a)(10)(A)(i)(VIII) and 42 CFR 435.119.	<u>“New Adult Group Medical”</u>

Corresponding Population Number per STC 18 or Expenditure Authority	Reporting Name Description	CMS-64 Reporting Name
Population 4	Report for all expenditures for individuals eligible as part of the Highest Need Group.	<u>“ABD”</u>
Population 5	Report for all expenditures for individuals eligible as part of the High Need Group.	<u>“ABD”</u>
Population 6	Report for all expenditures for individuals eligible as part of the Moderate Needs Group.	<u>“Moderate Needs”</u>
Population 7 Population 8	Report for all expenditures for individuals eligible as pharmacy-only expansions through VT Global (previously VHAP Rx).	<u>“VT Global Rx”</u>
Investments	Report for all expenditures labeled investments as described in STC 83, except for DSR investments.	<u>“Investments” (formerly referred to as “MCO Investments”)</u>
Delivery System Reform (DSR) Investments	Report for all expenditures labeled DSR investments as described in STC 87.	<u>“DSR Investments”</u>
Individually Assessed Cost-effective Services	Report for all expenditures labeled individually assessed cost effective services described in STC 20(b).	<u>“Ind Cost Eff Serv”</u>

Corresponding Population Number per STC 18 or Expenditure Authority	Reporting Name Description	CMS-64 Reporting Name
Designated State Health Programs	Report for designated state health program expenditures for the state-funded Marketplace subsidy program for individuals at or below 300 percent of the FPL who purchase health care coverage in the Marketplace.	<u>“Marketplace Subsidy”</u>
Designated State Health Programs	Report for designated state health program expenditures for individuals receiving CRT services who are not Medicaid enrolled.	<u>“CRT DSHP”</u>
SUD IMD Expenditures	Report for SUD IMD expenditures for costs of medical assistance that could be covered, were it not for the IMD prohibition under the state plan, provided to otherwise eligible individuals during a month in an IMD.	<u>“SUD IMD ABD”</u> <u>“SUD IMD ABD Duals”</u> <u>“SUD IMD Non-ABD”</u> <u>“SUD IMD New Adult”</u>
SMI IMD Expenditures	Report for SMI IMD expenditures for costs of medical assistance that could be covered, were it not for the IMD prohibition under the state plan, provided to otherwise eligible individuals during a month in an IMD.	<u>“SMI IMD ABD”</u> <u>“SMI IMD ABD Duals”</u> <u>“SMI IMD Non-ABD”</u> <u>“SMI IMD New Adult”</u>

- b. It is understood that individuals receiving Community Rehabilitation and Treatment (CRT) Services are included in MEGs that are reported on the CMS-64. Reporting to CMS will occur via a supplemental information report provided as backup to the CMS-64. This report will be submitted concurrently with the other CMS-64 backup documentation submitted every quarter.

- c. For purposes of this section, the term “expenditures subject to the budget neutrality cap” must include all Medicaid expenditures on behalf of the individuals who are enrolled in this demonstration (as described in subparagraph (a) of this section) and who are receiving the services subject to the budget neutrality cap. All Global Commitment to Health program expenditures that are subject to the budget neutrality cap are considered demonstration expenditures and must be reported on line 49 of forms CMS-64.9 waiver and/or 64.9P waiver. The state must continue to report Choices for Care program (nursing facility and HCBS) expenditures on the appropriate service line on the CMS-64.
- d. Premiums and other applicable cost-sharing contributions from enrollees that are collected by the state from enrollees under the demonstration must be reported to CMS on the CMS-64 Summary Sheet, Line 9D “Other.” In order to ensure that the demonstration is properly credited with premium collections, please indicate in the CMS- 64 Certification “Footnotes” section that Line 9D of the Summary Sheet is for Global Commitment Collections only.
- e. Administrative costs are not included in the budget neutrality agreement. The state must report administrative costs on the appropriate CMS-64 reporting line. Administrative costs associated with investments that are strictly administrative in nature are subject to the budget neutrality limit and are reported on the “Investments” or “DSR investments” waiver forms. All other administrative costs must be identified on the Forms CMS-64.10 waiver and/or 64.10P Waiver.
- f. MBES/CBES Schedule C Reporting Adjustments. The state must submit prior period adjustments subsequent to the routine CMS-64 reporting instructions outlined in section 2500 of the State Medicaid Manual to report actual expenditures incurred for demonstration services in DY9 (CY 2014) through DY11 (CY 2016). The state shall complete these reporting adjustments within 12 months of the date of CMS’ approval of this extension and provide written certification of the accuracy of the adjusted expenditures upon completion. The state must provide an update on the progress of these adjustments during the CMS monitoring calls described in STC 43.
- g. All claims for expenditures subject to the budget neutrality cap (including any cost settlements) must be made within 2 years after the calendar quarter in which the state made the expenditures. Furthermore, all title XIX claims for services during the demonstration period (including any cost settlements and claims incurred during the demonstration but paid subsequent to the end date of the demonstration) are considered allowable expenditures under the demonstration and must be made within two (2) years after the conclusion or termination of the demonstration. During the latter two (2)-year period, the state must continue to identify separately net expenditures related to dates of service during the operation of the section 1115 demonstration on the CMS-64 waiver forms in order to properly account for these expenditures in determining budget neutrality.

- h. At the end of the demonstration, all investment claims (as defined in STC 83) for expenditures subject to the budget neutrality cap (including any cost settlements and non-title XIX claims incurred during the demonstration but paid subsequent to the end date of the demonstration) must be made within two (2) quarters (six (6) months) after the calendar quarter in which the state made the expenditures. During the latter six (6) month period, the state must continue to identify separately net expenditures related to dates of service during the operation of the section 1115 demonstration on the CMS-64 waiver forms in order to properly account for these expenditures in determining budget neutrality.
- i. Disproportionate Share Hospital (DSH) payments are not counted as expenditures under the demonstration.

55. Reporting Member Months. The following describes the reporting of member months for demonstration populations.

- a. For the purpose of calculating the budget neutrality expenditure limit and for other purposes, the state must provide to CMS, as part of the Quarterly Report required under STC 50, the actual eligible member months for each of the Eligibility Groups (EG) described above. The state must submit a statement accompanying the Quarterly Report, which certifies the accuracy of this information. To permit full recognition of "in process" eligibility, reported counts of member months may be subject to revision.
- b. The term "eligible member/months" refers to the number of months in which persons are eligible to receive services. For example, a person who is eligible for 3 months contributes 3 eligible member/months to the total. 2 individuals, who are eligible for 2 months, each contributes two (2) eligible member months to the total, for a total of 4 eligible member/months.
- c. The state must report separate member months for individuals enrolled in the SUD program and the member months must be subtotaled according to the EG defined below.
 - i. SUD IMD: SUD IMD member months are periods of time of Medicaid eligibility during which the individual is an inpatient in an IMD under terms of the demonstration for any day during the month and must be reported separately for each SUD IMD EG, as applicable. SUD IMD member months must be non-duplicative of any demonstration budget neutrality limit member months.
- d. The state must report separate member months for individuals enrolled in the SMI/SED program and the member months must be subtotaled according to the EG defined below.

- i. SMI IMD: SMI IMD member months are periods of time of Medicaid eligibility during which the individual is an inpatient in an IMD under terms of the demonstration for any day during the month and must be reported separately for each SMI/SED IMD EG, as applicable. SMI IMD member months must be non-duplicative of any demonstration budget neutrality limit member months.

56. Standard Medicaid Funding Process. The standard Medicaid funding process must be used during the demonstration. Vermont must estimate matchable Medicaid expenditures on the quarterly form CMS-37 based on the PMPM limit (or a percentage of the PMPM limit) and projected caseload for the quarter. In addition, the estimate of matchable demonstration expenditures (total computable and federal share) subject to the budget neutrality cap must be separately reported by quarter for each federal fiscal year on the form CMS-37 for both the medical assistance payments (MAP) and state and local administrative costs (ADM) outside of the PMPM limit. CMS will 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 must submit the form CMS-64 quarterly Medicaid expenditure report, showing Medicaid expenditures, consistent with the definition of an expenditure in 45 C.F.R. 95.13, made in the quarter just ended.

- a. Intergovernmental transfers of the individual per member per month fixed amount from AHS to DVHA are not reportable expenditures, but provide funding for reportable DVHA expenditures. CMS will reconcile expenditures reported on the 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. Sources of Non-Federal Share. The state certifies that the source of the non-federal share of funds for the demonstration are state/local monies. The state further certifies that such funds must not be used as the non-federal share 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. CMS will 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 must be addressed within the time frames set by CMS.
- b. Any amendments that impact the financial status of the program must require the state to provide information to CMS regarding all sources of the non-federal share of funding.

58. State Certification of Public Expenditures. Nothing in these STCs concerning certification of public expenditures relieves the state of its responsibility to comply with federal laws and regulations, and to ensure that claims for federal funding are consistent with all applicable

requirements. 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 tax dollars have been expended as the non-federal share of funds under the demonstration.
 - b. To the extent the state utilizes certified public expenditures (CPEs) as the funding mechanism for title XIX (or under section 1115 authority) payments, CMS must approve a cost reimbursement methodology. The state must receive prior approval from CMS before implementing any CPEs. 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 payments under the demonstration, governmental entities to which general revenue funds are appropriated must certify to the state the amount of such tax revenue (state or local) used to satisfy demonstration expenditures. 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 as a source of non-federal share to the extent that such funds are derived from state or local tax revenues 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. Under all circumstances, health care providers must retain 100 percent of the payment for the claimed expenditure. Moreover, no pre-arranged agreements (contractual or otherwise) may exist between health care providers and state and/or local government to return and/or redirect 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, and 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. Intergovernmental transfers are not themselves expenditures, but may be a source of funding for expenditures.
- 59. Monitoring the Demonstration.** The state will provide CMS with information to effectively monitor the demonstration, upon request, in a reasonable timeframe.
- 60. Program Integrity.** The state must have processes in place to ensure that there is no duplication of federal funding for any aspect of the demonstration.

XI. MONITORING BUDGET NEUTRALITY FOR THE DEMONSTRATION

- 61. Limit on Title XIX Funding.** Vermont will be subject to a limit on the amount of federal title XIX funding that the state may receive on selected Medicaid expenditures during the period of approval of the demonstration. The limit will consist of two parts, Medicaid Eligibility Groups defined in these Terms and Conditions and the New Adult Group, and are determined by using a per capita cost method. The Supplemental Test for the New Adult Group is described in STC 65. Actual expenditures subject to the budget neutrality expenditure limit must be reported by Vermont using the procedures described in the section for General Financial Requirements under title XIX. The data supplied by the state to CMS to calculate the annual limits is subject to review and audit, and if found to be inaccurate, will result in a modified budget neutrality expenditure limit. CMS’ assessment of the state’s compliance with these annual limits will be done using the Schedule C report from the Medicaid Budget and Expenditure System/ Children’s Health Insurance Budget and Expenditure System (MBES/CBES).
- 62. Risk.** Vermont will be at risk for the per capita cost for demonstration enrollees under this budget neutrality agreement, but not for the number of demonstration enrollees in each of the groups. By providing FFP for all demonstration enrollees, Vermont will not be at risk for changing economic conditions which impact enrollment levels. However, by placing Vermont at risk for the per capita costs for demonstration enrollees, CMS assures that the federal demonstration expenditures do not exceed the level of expenditures that would have occurred had there been no demonstration.
- 63. Budget Neutrality Annual Expenditure Limit.** For each year of the budget neutrality agreement an annual budget neutrality expenditure limit is calculated for each EG described as follows:
- a. An annual EG estimate must be calculated as a product of the number of eligible member months reported by the state for that EG under the section entitled General Reporting Requirements, times the appropriate estimated per member per month (PMPM) costs from the table in subparagraph (b) below.
 - b. The PMPMs for each EG used to calculate the annual budget neutrality expenditure limit for this demonstration is specified below.

Medicaid Eligibility Group	Trend Rate	DY 12 PMPM CY 2017	DY 13 PMPM CY 2018	DY 14 PMPM CY 2019	DY 15 PMPM CY 2020	DY 16 PMPM CY 2021
ABD - Non-Medicare – Adult	3.70%	\$1,509.69	\$1,565.54	\$1,623.47	\$1,683.54	\$1,745.83
ABD - Non-Medicare – Child	3.70%	\$2,957.18	\$3,066.60	\$3,180.06	\$3,297.72	\$3,419.74

ABD – Dual	3.70%	\$2,599.65	\$2,695.84	\$2,795.58	\$2,899.02	\$3,006.28
ANFC - Non-Medicare – Adult	4.90%	\$644.18	\$675.75	\$708.86	\$743.60	\$780.03
ANFC - Non-Medicare – Child	4.60%	\$537.35	\$562.07	\$587.93	\$614.97	\$643.26

c. Each DY, the net variance between the without-waiver cost and actual with-waiver cost will be reduced. The reduced variance, to be calculated as a percentage of the total variance, will be used in place of the total variance to determine overall budget neutrality for the demonstration. (Equivalently, the difference between the total variance and reduced variance could be subtracted from the without-waiver cost estimate.) The formula for calculating the reduced variance is: reduced variance equals total variance times applicable percentage. The percentages for each EG and DY are determined based on how long the associated population has been enrolled in managed care subject to this demonstration; lower percentages are for longer-established managed care populations. In the Vermont demonstration, the percentages below apply to all EGs in the same manner.

	DY 12 CY 2017	DY 13 CY 2018	DY 14 CY 2019	DY15 CY 2020	DY 16 CY 2021
Savings Percentage	30%	25%	25%	25%	25%

64. **Impermissible DSH, Taxes or Donations.** The CMS reserves the right to adjust the budget neutrality terms in order to be consistent with enforcement of impermissible provider payments, health care-related taxes, new federal statutes, or with policy interpretations implemented through letters, memoranda, or regulations. CMS reserves the right to make adjustments to the budget neutrality terms 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.
65. **Monitoring of New Adult Group Spending and the Opportunity to Adjust Projections.** For each DY, a separate annual budget limit for the new adult group will be calculated as product of the trended monthly per person cost times the actual number of eligible/member months as reported to CMS by the state under the guidelines set forth in STC 55. The trend rates and per capita cost estimates for the new adult group are listed in the table below.

Medicaid Eligibility Group	Trend Rate	DY 12 PMPM CY 2017	DY 13 PMPM CY 2018	DY 14 PMPM CY 2019	DY 15 PMPM CY 2020	DY 16 PMPM CY 2021
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New Adult Group	4.20%	\$518.26	\$540.03	\$562.71	\$586.34	\$610.97
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- a. If the state’s experience of the take-up rate for the new adult group and other factors that affect the costs of this population indicate that the PMPM limit described above may underestimate the actual costs of medical assistance for the new adult group, the state has the opportunity to submit an adjustment to the PMPM limit, along with detailed expenditure data to justify this, for CMS review without submitting an amendment pursuant to STC 7. In order to ensure timely adjustments to the PMPM limit for a demonstration year, the revised projection must be submitted to CMS by no later than the end of the third quarter of the demonstration year for which the adjustment would take effect. Additional adjustments to the PMPM limit may be made pursuant to the process outlined in (d) below.
- b. The budget limit for the new adult group is calculated by taking the PMPM cost projection for the above group in each DY, times the number of eligible member months for that group and DY, and adding the products together across DYs. The federal share of the budget neutrality cap is obtained by multiplying the total computable budget neutrality cap by the federal share.
- c. The state will not be allowed to obtain budget neutrality “savings” from this population.
- d. If total FFP reported by the state for the new adult group should exceed the federal share of FFP for the budget limit for the new adult group by more than 3 percent following each demonstration year, the state must submit a corrective action plan to CMS for approval.

66. Supplemental Budget Neutrality Test 1: SUD Expenditures. As part of the SUD program, the state may receive FFP for the continuum of services to treat OUD and other SUDs, provided to Medicaid enrollees in an IMD. These are state plan services that would be eligible for reimbursement if not for the IMD exclusion. Therefore, they are being treated as hypothetical for the purposes of budget neutrality. Hypothetical services can be treated in budget neutrality in a way that is similar to how Medicaid state plan services are treated, by including them as a “pass through” in both the without-waiver and with-waiver calculations. However, the state will not be allowed to obtain budget neutrality “savings” from these services. If total FFP for hypothetical groups should exceed the federal share of the SUD Budget Neutrality Test Hypotheticals Cap, the difference must be reported as a cost against the budget neutrality limit described in STC 63.

Medicaid Eligibility Group (MEG)	TREND	DY 12 PMPM CY 2017	DY 13 PMPM CY 2018	DY 14 PMPM CY 2019	DY 15 PMPM CY 2020	DY 16 PMPM CY 2021
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SUD IMD ABD	3.4%	n/a	\$3,436.40	\$3,553.24	\$3,674.05	\$3,798.97
SUD IMD ABD Duals	1.8%	n/a	\$2,749.94	\$2,799.44	\$2,849.83	\$2,901.13
SUD IMD Non-ABD	0.0%	n/a	\$2,852.36	\$2,852.36	\$2,852.36	\$2,852.36
SUD IMD New Adult	0.6%	n/a	\$2,988.12	\$3,006.05	\$3,024.09	\$3,042.23

67. Supplemental Budget Neutrality Test 2: SMI/SED Services. As part of the SMI program, the state may receive FFP for the continuum of services to treat SMI/SED, provided to Medicaid enrollees in an IMD. These are state plan services that would be eligible for reimbursement if not for the IMD exclusion. Therefore, they are being treated as hypothetical for the purposes of budget neutrality. Hypothetical services can be treated in budget neutrality in a way that is similar to how Medicaid state plan services are treated, by including them as a “pass through” in both the without-waiver and with-waiver calculations. However, the state will not be allowed to obtain budget neutrality “savings” from these services. If total FFP for hypothetical groups should exceed the federal share of the SMI Budget Neutrality Test Hypotheticals Cap, the difference must be reported as a cost against the budget neutrality limit described in STC 63.

Medicaid Eligibility Group (MEG)	TREND	DY 12 PMPM CY 2017	DY 13 PMPM CY 2018	DY 14 PMPM CY 2019	DY 15 PMPM CY 2020	DY 16 PMPM CY 2021
SMI IMD ABD	3.0%	n/a	n/a	n/a	\$15,587	\$16,054
SMI IMD ABD Duals	3.0%	n/a	n/a	n/a	\$18,896	\$19,633
SMI IMD Non-ABD	3.9%	n/a	n/a	n/a	\$10,056	\$10,448
SMI IMD New Adult	4.4%	n/a	n/a	n/a	\$11,669	\$12,182

68. Composite Federal Share Ratios. The federal share of the budget neutrality expenditure limit is calculated by multiplying the limit times the Composite Federal Share Ratio. The Composite Federal Share is the ratio calculated by dividing the sum total of federal financial

participation (FFP) received by the state on actual demonstration expenditures during the approval period, as reported through the MBES/CBES and summarized on Schedule C with consideration of additional allowable demonstration offsets such as, but not limited to, premium collections and pharmacy rebates, by total computable demonstration expenditures for the same period as reported on the same forms.

- 69. **Enforcement of Budget Neutrality.** CMS shall enforce budget neutrality over the life of the demonstration rather than on an annual basis. The budget neutrality test for the demonstration extension will incorporate net savings from the immediately prior demonstration period of October 1, 2011 through December 31, 2016, but not from any earlier approval period.
- 70. **Exceeding Budget Neutrality.** If the budget neutrality expenditure limit, as defined in STC 63, has been exceeded at the end of this demonstration period, the excess federal funds, must be returned to CMS. If the demonstration is terminated prior to the end of the budget neutrality agreement, an evaluation of this provision shall be based on the time elapsed through the termination date.
- 71. **Expenditure Review and Cumulative Target Calculation.** CMS will enforce budget neutrality over the life of the demonstration, rather than on an annual basis. However, no later than 6 months after the end of each demonstration year, CMS will calculate an annual expenditure target for the completed year. This amount will be compared with the actual FFP claimed by the state under budget neutrality. Using the schedule below as a guide, if the state exceeds the cumulative target, they must submit a corrective action plan (CAP) to CMS for approval within 30 days of notification from CMS. The state will subsequently implement the approved CAP.

<u>Year</u>	<u>Cumulative Target Definition</u>	<u>Percentage</u>
Year 12	Year 12 budget estimate plus	3 percent
Year 13	Years 12 and 13 combined budget estimate plus	3 percent
Year 14	Years 12 through 14 combined budget estimate plus	3 percent
Year 15	Years 12 through 15 combined budget estimate plus	1.5 percent

Year 16	Years 12 through 16 combined budget estimate plus	0 percent
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XII. EVALUATION OF THE DEMONSTRATION

- 72. 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 independent party must sign an agreement to conduct the demonstration evaluation in an independent manner in accord 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.
- 73. Evaluation Budget.** A budget for the evaluation must 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, 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 design is not sufficiently developed, or if the estimates appear to be excessive.
- 74. Draft Evaluation Design.** The state’s Evaluation Design must be amended to incorporate the SMI component. The state must submit, for CMS comment and approval, an updated draft Evaluation Design with implementation timeline no later than 180 days after the approval date of the SMI amendment. Any modifications to an existing approved Evaluation Design will not affect previously established requirements and timelines for report submission for the demonstration, if applicable.
- a. Evaluation Design of PHE flexibilities for Medicaid beneficiaries. The state must submit an evaluation design to CMS within 60 days of the STC 24 (e) amendment approval which allows flexibilities during public health emergencies. CMS will provide guidance on an evaluation design specifically for the flexibilities approved for the public health emergency. The state is required to post its evaluation design to the state’s website within 30 days of CMS approval of the evaluation design, per 42 CFR 431.424(e). The state will test whether and how the approved flexibilities affect the state’s response to the public health emergency. To that end, the state will use research questions that pertain to the approved flexibilities. The evaluation will also assess cost-effectiveness by tracking administrative costs and health services expenditures for demonstration beneficiaries and assessing how these outlays affected the state’s response to the public health emergency.

- 75. Evaluation Design Approval and Updates.** The state must submit a revised draft Evaluation Design within 60 days after receipt of CMS' comments. Upon CMS approval of the draft Evaluation Design, the document 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 30 days of CMS approval. The state must implement the evaluation design and submit a description of the evaluation implementation progress in each of the Monitoring Reports, including any required Rapid Cycle Assessments specified in these STCs. Once CMS approves the evaluation design, if the state wishes to make changes, the state must submit a revised evaluation design to CMS for approval.
- 76. SUD and SMI Evaluation Questions and Hypotheses.** The evaluation documents must include a discussion of the SUD and SMI evaluation questions and hypotheses that the state intends to test. 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).
- 77. Interim Evaluation Report.** The state must submit an Interim Evaluation Report 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 Report 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 how the design was adapted should be included. If the state is not requesting a renewal for a demonstration, an 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 60 calendar days after receiving CMS comments on the draft Interim Evaluation Report and post the document to the state's website.

78. Summative Evaluation Report. The state must submit a draft Summative Evaluation Report for the demonstration's approval period, July 1, 2018 – December 31, 2021, within 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 60 calendar days of receiving comments from CMS on the draft.

The final Summative Evaluation Report must be posted to the state's Medicaid website within 30 calendar days of approval by CMS.

- b. Final Report, PHE flexibilities for Medicaid beneficiaries. The final report will consolidate Monitoring and Evaluation reporting requirements for flexibilities during public health emergencies approved in STC 24(e). The state must submit this final report no later than one year after the end of the public health emergency flexibilities. The final report will capture data on the demonstration implementation, lessons learned, and best practices for similar situations. The state will be required to track separately all expenditures associated with these flexibilities, including but not limited to, administrative costs and program expenditures. CMS will provide additional guidance on the structure and content of the final report.

Should the approval period of this flexibility exceed one year, for each year of the demonstration that the state is required to complete per the annual report required under 42 CFR 431.428(a), the state may submit that information in the Final Report.

79. 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, and/or the summative evaluation.

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

81. Additional Publications and Presentations. For a period of 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 10 business days to review and comment on publications before they are released. CMS may choose to decline to comment 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.

- 82. Cooperation with Federal Evaluators.** As required under 42 CFR 431.420(f), the state shall 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 shall include in its contracts with entities who collect, produce or maintain data and files for the demonstration, that they shall 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 47.

XIII. USE OF DEMONSTRATION FUNDS

- 83. Use of Demonstration Funds.** Since 2005, the state has been able to make expenditures previously referred to as "Managed Care Organization" (MCO) investments. As part of the 2017 extension these expenditures will be referred to as "investments." The demonstration provides authority for expenditures within the annual limits specified in STC 84 below and can include expenditures within the following areas:
- a. Reduce the rate of uninsured and/or underinsured in Vermont;
 - b. Increase the access to quality health care by uninsured, underinsured, and Medicaid beneficiaries;
 - c. Provide public health approaches and other innovative programs to improve the health outcomes, health status and quality of life for uninsured, underinsured and Medicaid-eligible individuals in Vermont; and
 - d. Encourage the formation and maintenance of public-private partnerships in health care, including initiatives to support and improve the health care delivery system and promote transformation to value-based and integrated models of care.
- 84. Phase-Down of Investments.** The state must follow the phase-down schedule below for the following investments. The percentages note what proportion of the SFY 2016 expenditures the state has authority to spend for DY 1 through DY 5 of the extension period, which was approved in 2016.

	DY 1 of the extension CY 2017 DY 12	DY 2 of the extension CY 2018 DY 13	DY 3 of the extension CY 2019 DY 14	DY 4 of the extension CY 2020 DY 15	DY 5 of the extension CY 2021 DY 16
Vermont Psychiatric Care Hospital, Brattleboro Retreat, Valley Vista, Maple Leaf, Serenity House, and Lund Home (IMD)	100%	100%	100%	100%	75% of DY 14 spending (Estimated spending: \$29,987,401)
HIT	100%	50%	0%	0%	0%
Non-state plan Related Education Fund Investments, Room and Board, and Physician Training Program not tied to serving in an underserved area	100%	100%	67%	33%	0%

85. Investment Annual Limits. The table below shows the specific annual limits. These amounts cannot be rolled over from DY to DY.

	DY 1 of the extension	DY 2 of the extension	DY 3 of the extension	DY 4 of the extension	DY 5 of the extension	Total
	CY 2017	CY 2018	CY 2019	CY 2020	CY 2021	
Annual Investment Limit	\$142.5M	\$148.5M	\$138.5M	\$136.5M	\$136.5M	\$702.5M

86. Investment Approval Process. The state may spend up to the amounts listed in the above “Investment Annual Limits” STC 85 on approved investments during each DY. See Attachment H for a list of approved investments. The state must submit an Investment Claiming Protocol for all current and new investments. This protocol will become Attachment M. The annual limits cannot be rolled over to the next DY. If the state chooses to add a new investment, it must meet the criteria specified in STC 83 “Use of Demonstration Funds” and must not supplant other federal involvement (including meeting a maintenance of effort requirement for any federal grant program) and must not include the following, including other activities CMS determines are unallowable:

- a. Construction costs (bricks and mortar);
- b. Room and board;
- c. Animal shelters and vaccines;
- d. Provider or beneficiary debt relief and restructuring;
- e. Sheltered workshops;
- f. Research expenditures;
- g. Rent and/or utility subsidies that are normally funded by the United States Department of Housing and Urban Development;
- h. Prisons, correctional facilities or services for people who are civilly committed and unable to leave an institutional setting;
- i. Services provided to individuals who are not lawfully present in the United States or are undocumented;
- j. Facility closures;
- k. Unspecified projects; and
- l. School based programs for children.

87. Accountable Care Organization (ACO) and Medicaid Community Provider Integration Program (“Medicaid Pathway”) Investments. CMS is making one-time funding available under the above investment structure for the state to assist the Accountable Care Organization (ACO) and Medicaid community providers in one-time, developmental start-up funding. STC 86 establishes that Vermont shall notify CMS of delivery system-related investments that fall within the following categories which requires that the state notify CMS 90 days prior to claiming for any of the proposed new investments. If CMS finds that the proposed investment does not meet the criteria outlined in STC 83 and 87, it must notify Vermont of this finding within 45 days. For investments that do not fall within the categories below, Vermont must follow the notification and CMS review procedures as described in STC 88. The state must not include any costs listed in STC 86 above.

a. Delivery System Related Investment Categories

The goal of the delivery system-related investments is to support implementation of Vermont's All-Payer Accountable Care Organization (ACO) model.

- i. Category #1 projects consist of funding to the Accountable Care Organization(s). Funding under category #1 is limited to development costs only.
 - ii. Category #2 projects consist of funding to providers.
- b. Vermont may select time-limited, start-up delivery system investments in DY one (1) through DY four (4) of the extension period and maintenance investments in DY five (5) of the renewal period. These are time-limited investments that are expected to phase down and out at the end of five (5) years. There may not be start-up investments in DY five (5) of the extension period.
- c. A project plan is required for each project and shall include an explanation of how the project will provide a return on investment over the demonstration extension period and how the project could be sustainably funded or phased out by the completion of the five (5) year demonstration extension period. The state must include metrics for all projects and the metrics are required for all years that the project receives funding. Detailed requirements are listed in Attachment I.
- d. Vermont may include one-time, development start-up funding for its ACO and "Medicaid Pathways" program as an investment as long as the projects meet the criteria in Attachment I. For such projects, Vermont will follow the new investment notification requirements in STC 88 below.

88. New Investment Notification. The state must notify CMS of any new investments. Investments must meet the criteria in STC 83 above and must not include any of the activities listed in STC 86 above. The state must submit information regarding new investments following the template in Attachment J. The state may also choose from a menu of time-limited, start-up, one-time delivery system activities listed in Attachment I and must indicate if the proposed investment is strictly administrative in nature. The state must notify CMS 90 days prior to claiming for any of the proposed new investments. CMS reserves the right to not approve new investments if they do not meet the criteria above or if CMS and the state cannot agree to a phase-down schedule for the Vermont Psychiatric Care Hospital and other IMD costs. If CMS finds that the proposed investment does not meet the criteria above, it must notify Vermont of this finding within 45 days. If CMS notifies the state with concerns, the proposed investment will be considered under review as outlined in STC 89 below.

89. Requirement for Approval of Investments That Do Not Meet Criteria. The state may request to add an investment that does not meet the requirements of STC 87 or the menu of delivery system projects in Attachment I. In this instance, the state must submit a letter to

CMS at least 120 days prior to the proposed implementation explaining the investment and providing justification for the investment, including how the investment advances the goals of the Medicaid program and demonstration. CMS will review the investment and will issue a disapproval or approval within 60 days of receipt of the state's letter.

- 90. IMD Evaluation Requirements.** CMS is continuing time-limited expenditure authority for costs not otherwise matchable, subject to the cap described in STC 85 for costs of care to eligible individuals at a specific group of facilities (listed in STC 84) that are IMDs. Given this unique previously approved authority, CMS is asking the state to perform an extensive evaluation of the IMD expenditure authority (in addition to the evaluation that is required under the SUD program approved in the SUD amendment) on individuals with severe mental illness as well as individuals in need of acute mental health and substance use disorder services in the context of system-wide service, payment, and delivery system reforms. The evaluation will help inform broader policy discussions about Medicaid funding for IMD services.
- 91. Phase-Down Plan for Vermont Psychiatric Care Hospital and IMD Expenditures.** No later than December 31, 2018, the state must submit a phase-down schedule for the Vermont Psychiatric Care Hospital and other IMD expenditures. The state must propose a lower amount for the IMD expenditures for Calendar Year 2021 (DY five (5) of the demonstration extension). The reduced IMD expenditures must start January 1, 2021. IMD expenditures must phase down to \$0 by December 31, 2025. If the state does not submit the phase-down plan by December 31, 2018, the default percentage for DY five (5) of the extension period (DY 16) is 0percent.
- 92. Application Process for Use of Demonstration Funds.** AHS will use a standardized approach to evaluate new investment applications. Documentation of new and proposed investments will be posted on the state's Global Commitment to Health register website. Where specific program statistics for Medicaid, uninsured, or underinsured members are not available, the state will apply a proxy percentage for allowable expenditures based on the most recent reliable and valid state survey information such as the Vermont Household Health Insurance Survey. Monitoring and evaluation of approved investments will be performed and submitted to CMS in the quarterly and annual reports to ensure that expenditures advance the goals of the demonstration and the Medicaid program and do not violate the restrictions listed in STC 86.
- 93. Administrative Investments.** The state may only receive the 50 percent administrative matching rate for investments that are strictly administrative in nature. The following investments have been found to be strictly administrative in nature:

 - a. Green Mountain Care Board;
 - b. Health Research and Statistics;
 - c. Patient Safety Adverse Events; and

d. Area Health Education Centers (AHEC).

XIV. MEASUREMENT OF QUALITY OF CARE AND ACCESS TO CARE

94. **Comprehensive State Quality Strategy (CQS).** The state shall expand upon the managed care quality strategy requirements at 42 CFR 438.340 and adopt and implement a comprehensive, dynamic, and holistic continuous quality improvement strategy that integrates all aspects of quality improvement programs, processes, and requirements across the state's Medicaid program. This comprehensive quality strategy (CQS) must address quality improvement for all components of the state's Medicaid state plan and its section 1115 demonstration. The CQS must meet all the requirements of 42 CFR 438 and must include LTSS and HCBS quality components.

a. *CQS Elements.* The CQS must also address the following elements, as well as those identified in 42 CFR 438.340(b):

- i. Goals. Building on the requirements at 42 CFR 438.340(b)(2), the state's goals for improvement, identified through claims and encounter data, quality metrics, and expenditure data. The goals should align with the three-part aim but should be more specific in identifying pathways for the state to achieve these goals.
- ii. Responsibilities. The CQS must identify Single State Agency and public managed care responsibilities. The Single State Agency retains ultimate authority and accountability for public managed care responsibilities and adherence to the CQS, including monitoring and evaluation of the public managed care model's compliance with requirements specific to the MLTSS assurances identified in STC 93(a)(v)(2) below as well as the health and welfare of enrollees.
- iii. Performance Improvement Projects (PIPs). Building on the requirements at 42 CFR 438.340(b)(3)(ii), the associated interventions for improvement in the goals. All performance improvement project (PIP) topics, tied to specific goals, must be included in the CQS.
- iv. Performance Measures. Building on the requirements at 42 CFR 438.340(b)(3)(i), the specific quality metrics for measuring improvement in the goals. The metrics should be aligned with the CMS Child and Adult Core Measure Sets for Medicaid and CHIP, and should also align with other existing Medicare and Medicaid federal measure sets where possible and appropriate. The metrics should go beyond Healthcare Effectiveness Data and Information Set (HEDIS®) and Consumer Assessment of Healthcare Providers and Systems (CAHPS) data, and should reflect cost of care.

1. Levels of Aggregation. Metrics should be measured at the following levels of aggregation: the state Medicaid agency, specific health care program (such as Choices for Care), if applicable, and potentially at each direct health services provider. The state will work with CMSto further define metrics, as appropriate, for collection.
 2. Benchmarks and Targets. The specific methodology for determining benchmark and target performance on these metrics.
- v. Populations. Specific metrics related to each population covered by the Medicaid program, including children, pregnant women, non-disabled adults (including parents), individuals receiving HCBS services, and individuals receiving LTSS.
1. HCBS performance measures in the areas of: level of care determinations, person-centered service planning process, outcome of person-centered goals, health and welfare, outcomes, quality of life, effectiveness process, community integration, and assuring there are qualified providers and appropriate HCBS settings.
 2. The CQS must include a special focus on MLTSS populations and address the following:
 - a. A self-assessment of MLTSS adherence to state and federal standards of care to include:
 - i. Assessment of existing initiatives designed to improve the delivery of MLTSS, including performance.
 - ii. Examination of processes to identify any potential corrective action steps toward improving the MLTSS system.
 - b. Person-centered planning and integrated care settings
 - c. Comprehensive and integrated service packages
 - d. Qualifications of providers
 - e. Participant protection
- vi. Timeline. The CQS should include a timeline that considers metric development and specification, contract amendments, data submission and review, incentive disbursement (if available), and the re-basing of performance data.

- vii. Monitoring and Evaluation. This should include specific plans for continuous quality improvement, which includes transparency of performance on metrics and structured learning, as well as a rigorous and independent evaluation of the demonstration, as described in STC 77. The evaluation in STC 77 should reflect all the programs covered by the CQS as mentioned above.
 - viii. Performance Improvement Accountability. The state must include in its CQS a determination of how plans for financial incentives, if available, adequately align with the specific goals and performance improvement targets, and whether enhancements to these incentives are necessary (increased or restructured financial incentives, in-kind incentives, contract management, etc.).
- b. *State and Provider Responsibilities*. The CQS must include state Medicaid agency and any contracted service providers' responsibilities, including managed care entities, and providers enrolled in the state's FFS program. The state Medicaid agency must retain ultimate authority and accountability for ensuring the quality of and overseeing the operations of the program. The CQS must include distinctive components for discovery, remediation, and improvement.
- c. *CQS Development, Evaluation, and Revision*. The state must comply with the requirements at 42 CFR 438.340(c) regarding the development, evaluation, and revision of the CQS. This includes the requirements at 42 CFR 438.340(c)(1) regarding public engagement. The state must revise (and submit to CMS for review) the CQS whenever this demonstration is renewed or materially amended, or when significant changes are made to the associated Medicaid programs and thus the content of the CQS. An outline and/or driver diagram for the revised CQS must be submitted to CMS with 90 days of approval of the demonstration extension or material amendment. A draft of the revised CQS must be submitted to CMS for review within 180 days of approval of the demonstration extension or material demonstration amendment.
- i. A material amendment to the demonstration is one that makes changes to the populations that participate in managed care; changes the services included in the managed care program; changes how the managed care program operates; brings an existing program into the demonstration; or otherwise substantially impacts a component of the CQS.
 - ii. Any further revisions must be submitted accordingly:
 - 1. Modifications to the CQS due to changes in the Medicaid operating authorities must be submitted concurrent with the proposed changes to the operating authority (e.g., state plan or waiver amendments or waiver extensions); and/or

2. Changes to an existing CQS due to fundamental changes to the CQS must be submitted for review to CMS no later than 60 days prior to the contractual implementation of such changes. If the changes to the CQS do not impact any provider contracts, the revisions to the CQS may be submitted to CMS no later than 60 days following the changes.
- iii. At a minimum, the CQS must be revised at least once every three (3) years (pursuant to 42 CFR 438.340(c)(2)), but no more often than once per year (inclusive of any revisions per the requirements of STC 50).
- d. *CQS Annual Reports*. Pursuant to STC 50, Annual Report, the state must include information on the implementation and effectiveness of its CQS in its annual demonstration reports, which should include a discussion of the CQS as it impacts the demonstration.
- e. *Availability*. Consistent with 42 CFR 438.340(d), the state must make the CQS available on the Web site required under 42 CFR 438.10(c)(3).

XV. Opioid Use Disorder (OUD)/Substance Use and Disorder (SUD)

- 95. Opioid Use Disorder/Substance Use Disorder Program.** Effective upon CMS' approval of the OUD/SUD Implementation Protocol, as described in STC 96, the demonstration benefit package for Vermont Medicaid recipients will include OUD/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 Vermont Medicaid recipients residing in IMDs under the terms of this demonstration for coverage of medical assistance, including OUD/SUD benefits that would otherwise be matchable if the beneficiary were not residing in an IMD. Vermont will aim for a statewide average length of stay of 30 days in residential treatment settings, to be monitored pursuant to the SUD Monitoring Protocol as outlined in Attachment O below, to ensure short-term residential treatment stays. Under this demonstration component, beneficiaries will have access to high-quality, evidence-based OUD and other SUD treatment services ranging from medically supervised withdrawal management to on-going chronic care for these conditions in cost-effective settings while also improving care coordination and care for comorbid physical and mental health conditions.

The coverage of OUD/SUD inpatient, residential treatment and withdrawal management services in IMDs will expand Vermont's current OUD/SUD benefit package available to all Vermont Medicaid recipients as outlined in Table 1. Room and board costs are not considered allowable costs for residential treatment service providers unless they qualify as inpatient facilities under section 1905(a) of the Act.

Table 1 Vermont OUD/SUD Benefits Coverage with Expenditure Authority

SUD Benefit	Medicaid Authority	Expenditure Authority
Early Intervention (Screening, Brief Intervention and Referral to Treatment)	State plan (Individual services covered)	
Outpatient Services	State plan (Individual services covered)	
Intensive Outpatient Services	State plan (Individual services covered)	
Residential Treatment	State plan (Individual services covered)	Services provided to individuals in IMDs
Medically Supervised Withdrawal Management	State plan	Services provided to individuals in IMDs
Medication-Assisted Treatment (MAT)	State plan	Services provided to individuals in IMDs

The state attests that the services indicated in Table 1, above, as being covered under the Medicaid state plan authority are currently covered in the Vermont Medicaid state plan.

96. SUD Implementation Protocol. The state must submit an SUD Implementation Protocol within 90 calendar days after approval of this demonstration. The state may not claim FFP for services provided in IMDs until CMS has approved the Implementation Protocol. With this amendment, CMS is also approving the SUD Implementation Protocol and it has been incorporated into the STCs, as Attachment N and, may be altered only with CMS approval. After approval of the SUD Implementation Protocol, FFP will be available prospectively, not retrospectively. Failure to submit an SUD Implementation Protocol 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 OUD/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. At a minimum, the OUD/SUD Implementation Protocol 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 of the SUD component of this demonstration program:

- a. **Access to Critical Levels of Care for OUD and other SUDs:** Service delivery for new benefits, including residential treatment and withdrawal management, within 12-24 months of OUD/SUD program demonstration approval;
- b. **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 comparable assessment and placement tools that reflect evidence-based clinical treatment guidelines within 12-24 months of OUD/SUD program demonstration approval;

- c. **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 SUD program demonstration approval;
- d. **Use of Nationally Recognized SUD-specific Program Standards to set Provider Qualifications for Residential Treatment Facilities:** Currently, residential treatment service providers must be a licensed organization, pursuant to the residential service provider qualifications described in the Preferred Provider Substance Use Disorder Treatment Standards of the Vermont Department of Health's Division of Alcohol and Drug Abuse Programs. The state will 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 comparable, 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 OUD/SUD program demonstration approval;
- e. **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 SUD program demonstration approval;
- f. **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 SUD program demonstration approval;
- g. **Sufficient Provider Capacity at each Level of Care including Medication-assisted Treatment for OUD:** An assessment of the availability of providers in the key 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 SUD program demonstration approval;
- h. **Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and OUD:** 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;
- i. **SUD Health IT Plan:** Implementation of the milestones and metrics as detailed in STC 99; and

- j. **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 SUD program demonstration approval.

97. SUD Monitoring Protocol. The state must submit a SUD Monitoring Protocol within 150 calendar days after approval of SUD program under this demonstration. The SUD Monitoring Protocol must be developed in cooperation with CMS and is subject to CMS approval. Once approved, the SUD Monitoring Protocol will be incorporated into the STCs, as Attachment O. At a minimum, the SUD Monitoring Plan Protocol will include reporting relevant to each of the program implementation areas listed in STC 96. The protocol will also describe the data collection, reporting and analytic methodologies for performance measures identified by the state and CMS for inclusion. The SUD Monitoring Protocol will specify 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 STC 50 of the demonstration. In addition, for each performance measure, the SUD Monitoring Protocol will identify a baseline, a target to be achieved by the end of the demonstration and an annual goal for closing the gap between baseline and target expressed as percentage points.

Where possible, baselines will be informed by state data, and targets will be benchmarked against performance in best practice settings. CMS will closely monitor demonstration spending on services in IMDs to ensure adherence to budget neutrality requirements. Progress on the performance measures identified in the Monitoring Protocol will be reported via the quarterly and annual monitoring reports.

98. Mid-Point Assessment. The state must conduct an independent mid-point assessment of the OUD/SUD Program by December 31, 2020. The assessor must collaborate with key stakeholders, including representatives of MCOs, SUD treatment providers, beneficiaries, and other key partners in the design, planning and conducting of the mid-point assessment. The assessment will include an examination of progress toward meeting each milestone and timeframe approved in the SUD Implementation Protocol, and toward closing the gap between baseline and target each year in performance measures as approved in the SUD Monitoring Protocol. The assessment will also include a determination of factors that affected achievement on the milestones and performance measure gap closure percentage points to date, and a determination of selected factors likely to affect future performance in meeting milestones and targets not yet met and about the risk of possibly missing those milestones and performance targets. The mid-point assessment will also provide a status update of budget neutrality requirements. For each milestone or measure target at medium to high risk of not being met, the assessor will provide, for consideration by the state, recommendations for adjustments in the state's implementation plan or to pertinent factors that the state can influence that will support improvement. The assessor will 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. A copy of the report will be provided to CMS. CMS will be briefed on the report.

For milestones and measure targets at medium to high risk of not being achieved, the state will submit to CMS modifications to the SUD Implementation Protocol and SUD Monitoring Protocols for ameliorating these risks subject to CMS approval.

- a. **SUD Evaluation.** The OUD/SUD Evaluation will be subject to the same requirements as the overall demonstration evaluation, as listed in sections IX General Reporting Requirements and XII Evaluation of the Demonstration of the STCs.
- b. **SUD Evaluation Design.** The state must submit, for CMS comment and approval, a revision to the Evaluation Design to include the SUD program with implementation timeline, no later than 180 days after the effective date of these amended STCs. 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 state must use an independent evaluator to develop the draft Evaluation Design.
 - i. **Evaluation Design Approval and Updates.** The state must submit a revised draft Evaluation Design within 60 days after receipt of CMS' comments. Upon CMS approval of the draft Evaluation Design, the document will be included as an attachment to these STCs. Per 42 CFR 431.424(c), the state will publish the approved Evaluation Design within 30 days of CMS approval. The state must implement the evaluation design and submit a description of its evaluation implementation progress in each of the Quarterly and Annual Reports, including any required Rapid Cycle Assessments specified in these STCs. Once CMS approves the evaluation design, if the state wishes to make changes, the state must submit a revised evaluation design to CMS for approval.

99. Evaluation Questions and Hypotheses Specific to OUD/SUD Program. 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).

100. SUD Health Information Technology (Health IT). The state will provide CMS with an assurance that it has a sufficient health IT infrastructure/"ecosystem" at every appropriate level (i.e. state, delivery system, health plan/MCO and individual provider) to achieve the goals of the demonstration—or it will submit to CMS a plan to develop the infrastructure/capabilities. This "SUD Health IT Plan," or assurance will be included as a section of the state's "Implementation Plan" (see STC 96) to be approved by CMS. The

SUD Health IT Plan will 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 SUD health IT ecosystem improvement.

- a. The SUD Health IT section of the Implementation Plan will include implementation milestones and dates for achieving them.
- b. The SUD Health IT Plan must be aligned with the state’s broader State Medicaid Health IT Plan (SMHP) and, if applicable, the state’s Behavioral Health (BH) “Health IT” Plan.
- c. The SUD Health IT Plan will describe the state’s goals, each DY, to enhance the state’s prescription drug monitoring program’s (PDMP).¹
- d. The SUD Health IT Plan will address how the state’s PDMP will enhance ease of use for prescribers and other state and federal stakeholders.² This will also include plans to include PDMP interoperability with a statewide, regional or local Health Information Exchange. Additionally, the SUD Health IT Plan will 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.
- e. The SUD 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 SUD 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.
- f. The SUD Health IT Plan will describe how the activities described in (a) through (e) above will support broader state and federal efforts to diminish the likelihood of long-term opioid use directly correlated to clinician prescribing patterns.³

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.

- g. In developing the Health IT Plan, states should use the following resources:
 - i. States may use resources at Health IT.Gov (<https://www.healthit.gov/playbook/opioid-epidemic-and-health-it/>) in “Section 4: Opioid Epidemic and Health IT.”
 - ii. 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, found at <https://www.healthit.gov/topic/advancing-interoperability-medicaid>.
 - iii. 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 plans and, more generally, to meet the goals of the demonstration
- h. The state will include in its SUD Monitoring Protocol (see STC 97) an approach to monitoring its SUD Health IT Plan which will include performance metrics provided by CMS or State defined metrics to be approved in advance by CMS.
- i. The state will 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 in an addendum to its Annual Reports (see STC 50).
- j. 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.
 - i. Where there are opportunities at the state and provider levels (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.
 - ii. Where there are opportunities at the state and provider levels 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.

101. 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 Protocol and the required performance measures in the Monitoring Protocol 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.

XVI. Serious Mental Illness (SMI) and Serious Mental Disturbance (SED)

102. SMI/SED Program Benefits. Under this demonstration, beneficiaries will have access to high quality, evidence-based SMI/SED treatment services. These services will range in intensity from short-term acute care in inpatient settings for SMI to ongoing chronic care for such conditions in cost-effective community-based settings. The state will work to improve care coordination and care for co-occurring physical and behavioral health conditions. The state must achieve a statewide average length of stay of no more than 30 days in inpatient treatment settings, to be monitored pursuant to the SMI/SED Monitoring Plan as outlined in STCs 103 – 105 below.

Vermont attests that the services indicated in Table 2 are either already covered under the Medicaid state plan authority or being authorized under the terms of this demonstration.

Table 2. SMI/SED Benefits Coverage Authorized with Expenditure Authority			
Benefit	Type	Medicaid Authority	Expenditure Authority
Crisis Stabilization Services	SMI/SED	State plan (Individual services covered)	N/A
Outpatient services	SMI/SED	State plan (Individual services covered)	N/A
Intensive outpatient services	SMI/SED	State plan (Individual services covered)	N/A
Inpatient services	SMI/SED	State plan (Individual services covered)	Services provided to individuals in IMDs
Residential treatment services	SMI	State plan (Individual services covered)	N/A

103. SMI/SED Implementation Plan.

- a. The state must submit the SMI/SED Implementation Plan within 90 calendar days after approval of the demonstration for CMS review and comment. The state must submit the revised SMI/SED Implementation Plan within sixty (60) calendar days after receipt of CMS’s comments. The state may not claim FFP for services provided in IMDs to

beneficiaries with a primary diagnosis of SMI or SED under the SMI IMD expenditure authority until CMS has approved the SMI/SED Implementation Plan and the SMI/SED Financing Plan described in STC 103(e). After approval of the applicable plans required by these STCs, FFP will be available prospectively, not retrospectively.

- b. Once approved, the SMI/SED Implementation Plan will be incorporated into the STCs as Attachment P, and once incorporated, may be altered only with CMS approval. Failure to submit an SMI/SED 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 SMI/SED 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 47.
- c. At a minimum, the SMI/SED 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. Ensuring Quality of Care in Psychiatric Hospitals and Residential Treatment Settings.

- A. Participating hospitals must be licensed or approved as meeting standards for licensing established by the agency of the state or locality responsible for licensing hospitals prior to the state claiming FFP for services provided to beneficiaries residing in a hospital that meets the definition of an IMD. In addition, hospitals must be in compliance with the conditions of participation set forth in 42 CFR Part 482 and be either: a) certified by the state agency as being in compliance with those conditions through a state agency survey, or b) deemed status to participate in Medicare as a hospital through accreditation by a national accrediting organization whose psychiatric hospital accreditation program or acute hospital accreditation program has been approved by CMS.
- B. Participating residential treatment providers must be licensed, or otherwise authorized, by the state to primarily provide treatment for mental illnesses. They must also be accredited by a nationally recognized accreditation entity prior to the state claiming FFP for services provided to beneficiaries residing in a residential facility that meets the definition of an IMD.
- C. Establishment of an oversight and auditing process that includes unannounced visits for ensuring participating psychiatric hospitals and residential treatment settings meet state licensure or certification requirements as well as a national accrediting entity's accreditation requirements;
- D. Use of a utilization review entity (for example, a managed care organization or administrative service organization) to ensure beneficiaries have access to the appropriate levels and types of care and to provide oversight to ensure lengths of stay are limited to what is medically necessary and only those who have a clinical

need to receive treatment in psychiatric hospitals and residential treatment settings are receiving treatment in those facilities;

- E. Establishment of a process for ensuring that participating psychiatric hospitals and residential treatment settings meet federal program integrity requirements and establishment of a state process to conduct risk-based screening of all newly enrolling providers, as well as revalidating existing providers (specifically, under existing regulations, the state must screen all newly enrolling providers and reevaluate existing providers pursuant to the rules in 42 CFR Part 455 Subparts B and E, ensure treatment providers have entered into Medicaid provider agreements pursuant to 42 CFR 431.107, and establish rigorous program integrity protocols to safeguard against fraudulent billing and other compliance issues);
- F. Implementation of a state requirement that participating psychiatric hospitals and residential treatment settings screen enrollees for co-morbid physical health conditions and substance use disorders (SUDs) and demonstrate the capacity to address co-morbid physical health conditions during short-term stays in residential or inpatient treatment settings (e.g., with on-site staff, telemedicine, and/or partnerships with local physical health providers).

ii. Improving Care Coordination and Transitions to Community-Based Care.

- A. Implementation of a process to ensure that psychiatric hospitals and residential treatment facilities provide intensive pre-discharge, care coordination services to help beneficiaries transition out of those settings into appropriate community-based outpatient services, including requirements that community-based providers participate in transition efforts (e.g., by allowing initial services with a community-based provider while a beneficiary is still residing in these settings and/or by hiring peer support specialists to help beneficiaries make connections with available community-based providers, including, where applicable, plans for employment);
- B. Implementation of a process to assess the housing situation of a beneficiary transitioning to the community from psychiatric hospitals and residential treatment settings and to connect beneficiaries who are homeless or who have unsuitable or unstable housing with community providers that coordinate housing services, where available;
- C. Implementation of a requirement that psychiatric hospitals and residential treatment settings have protocols in place to ensure contact is made by the treatment setting with each discharged beneficiary within 72 hours of discharge and to ensure follow-up care is accessed by individuals after leaving those facilities by contacting the individuals directly and by contacting the community-based provider they were referred to;
- D. Implementation of strategies to prevent or decrease the length of stay in emergency departments among beneficiaries with SMI or SED (e.g., through the use of peers and psychiatric consultants in EDs to help with discharge and referral to treatment providers);

- E. Implementation of strategies to develop and enhance interoperability and data sharing between physical, SUD, and mental health providers, with the goal of enhancing coordination so that disparate providers may better share clinical information to improve health outcomes for beneficiaries with SMI or SED.

iii. Increasing Access to Continuum of Care Including Crisis Stabilization Services.

- A. Establishment of a process to annually assess the availability of mental health services throughout the state, particularly crisis stabilization services, and updates on steps taken to increase availability;
- B. Commitment to implementation of the SMI/SED Financing Plan described in STC 103(e);
- C. Implementation of strategies to improve the state's capacity to track the availability of inpatient and crisis stabilization beds to help connect individuals in need with that level of care as soon as possible;
- D. Implementation of a requirement that providers, plans, and utilization review entities use an evidence-based, publicly available patient assessment tool, preferably endorsed by a mental health provider association (e.g., LOCUS or CASII) to determine appropriate level of care and length of stay.

iv. Earlier Identification and Engagement in Treatment Including Through Increased Integration

- A. Implementation of strategies for identifying and engaging individuals, particularly adolescents and young adults, with SMI or SED in treatment sooner, including through supported employment and supported education programs;
 - B. Increasing integration of behavioral health care in non-specialty care settings, including schools and primary care practices, to improve identification of SMI or SED conditions sooner and improve awareness of and linkages to specialty treatment providers;
 - C. Establishment of specialized settings and services, including crisis stabilization services, focused on the needs of young people experiencing SMI or SED.
- d. **SMI/SED Health IT Plan:** Implementation of the milestones and metrics as detailed in Attachment P.
- e. **SMI/SED Financing Plan.** As part of the SMI/SED Implementation Plan referred to in STC 103(c), the state must submit, within 90 calendar days after approval of the demonstration, a financing plan that will be approved by CMS. Once approved, the SMI/SED Financing Plan will be incorporated into the STCs as part of the SMI/SED Implementation Plan in Attachment P and, once incorporated, may only be altered with CMS approval. Failure to submit an SMI/SED Financing 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

SMI/SED program under this demonstration. Components of the financing plan must include:

- i. A plan to increase the availability of non-hospital, non-residential crisis stabilization services, including but not limited to the following: services made available through crisis call centers, mobile crisis units, coordinated community response services that includes law enforcement and other first responders, and observation/assessment centers; and
- ii. A plan to increase availability of ongoing community-based services such as intensive outpatient services, assertive community treatment, and services delivered in integrated care settings;
- iii. A plan to ensure the on-going maintenance of effort (MOE) on funding outpatient community-based services to ensure that resources are not disproportionately drawn into increasing access to treatment in inpatient and residential settings at the expense of community-based services.

104. SMI/SED Monitoring Protocol(s). The state must submit a SMI/SED Monitoring Protocol for the SMI/SED program authorized by this demonstration within 150 calendar days after approval of the SMI/SED Implementation Plan. The SMI/SED Monitoring Protocol Template must be developed in cooperation with CMS and is subject to CMS approval. The state must submit the revised SMI/SED Monitoring Protocol within sixty (60) calendar days after receipt of CMS' comments. Once approved, the SMI/SED Monitoring Protocol will be incorporated into the STCs, as Attachment Q. 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 103(c) and STC 104(c), reporting relevant information to the state's SMI/SED Financing Plan described in Attachment P, and reporting relevant information to the state's Health IT plans described in STC 103(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.

105. Evaluation. The SMI/SED Evaluation will be subject to the same requirements as the overall demonstration evaluation, as described in Sections IX (Monitoring and Reporting Requirements) and XII (Evaluation of the Demonstration) of these STCs.

106. Availability of FFP for the SMI/SED Services under the SMI IMD expenditure authority. FFP is only available for services provided to beneficiaries during short term stays for acute care in IMDs. The state may claim FFP for stays up to 60 days as long as it shows at its mid-point assessment that it is meeting the requirement of a 30 day or less average length of stay (ALOS). Stays in IMDs that exceed 60 days are not eligible for FFP

under this demonstration. If the state cannot show that it is meeting the 30 day or less ALOS requirement within one standard deviation at the mid-point assessment, the state may only claim FFP for stays up to 45 days until such time that the state can demonstrate that it is meeting the 30 day or less ALOS requirement. The state assures that it will provide coverage for stays that exceed 60 days—or 45 days, as relevant—with other sources of funding if it is determined that a longer length of stay is medically necessary for an individual beneficiary.

- 107. SMI/SED Mid-Point Assessment.** The state must conduct an independent mid-point assessment by December 31, 2020. In the design, planning and conducting of the mid-point assessment, the state must require that the independent assessor consult with key stakeholders including, but not limited to: representatives of managed care organizations (MCO), SMI/SED 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 60 days after December 31, 2020. 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 SMI/SED Implementation Plan, the SMI/SED Financing Plan, and the SMI/SED 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 SMI/SED Implementation Plan, the SMI/SED Financing Plan, and toward meeting the targets for performance measures as approved in the SMI/SED 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 SMI/SED Implementation Plan or SMI/SED Financing 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

- 108. Unallowable Expenditures Under the SMI and SUD IMD Expenditure Authority.** 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.
- b. Costs for services provided in a nursing facility as defined in section 1919 of the Act that qualifies as an IMD.
- c. Costs for services provided to individuals who are involuntarily residing in a psychiatric hospital or residential treatment facility by operation of criminal law.
- d. Costs for services provided to beneficiaries under age 21 residing in an IMD unless the IMD meets the requirements for the “inpatient psychiatric services for individuals under age 21” benefit under 42 CFR 440.160, 441 Subpart D, and 483 Subpart G.

XVII. SCHEDULE OF THE STATE DELIVERABLES OF THE DEMONSTRATION PERIOD

Due Date	Deliverable	STC Reference
30 calendar days after approval date ⁴	Written acknowledgement of the award letter and acceptance of the STCs	N/A; <i>see</i> Approval letter
90 calendar days after approval date	SUD Implementation Protocol	STC 96
150 calendar days after SUD program approval date	SUD Monitoring Protocol	STC 97
180 calendar days after the demonstration's implementation and annually thereafter	Post Award Forum	STC 44
180 days after the amendment approval (~June 5, 2020)	Draft Evaluation Design	STC 74
60 calendar days after receipt of CMS comments	Final Evaluation Design	STC 75
30 calendar days after CMS Approval	Approved Evaluation Design published to state's website	STC 75
December 31, 2020	SUD Mid-Point Assessment (not including SMI component)	STC 98
February 28, 2021	SMI/SED Mid-Point Assessment	STC 107
One year prior to current expiration date, December 31, 2020	Draft Interim Evaluation Report	STC 77

⁴ Approval date refers to the date marked on the approval letter for this demonstration.

60 calendar days after receipt of CMS comments	Interim Evaluation Report	STC 77
Within 18 months of the end of the demonstration period	Draft Summative Evaluation Report	STC 78
60 calendar days after receipt of CMS comments	Final Summative Evaluation Report	STC 78
30 calendar days after CMS approval	Approved Final Summative Evaluation Report published to state's website	STC 78
120 days prior to proposed Implementation	Approval of Investments That Do Not Meet Criteria	STC 89
90 days prior to claiming for any of the proposed new investments.	New Investment Notification	STC 88
Within 30 days of CMS written request.	State Data Collection	STC 52
No later than December 31, 2018	Phase-Down Plan for Vermont Psychiatric Care Hospital and IMD Expenditures	STC 91

Recurring Date	Deliverable	STC Reference
Not later than April 1 st	Annual Report	STC 50
Annually (included in annual report submission)	Comprehensive State Quality Strategy	STC 94
Not later than 90 days prior to the effective date	Interagency Agreement and Rate Certification	STC 23
Not later than October 1 of the demonstration year for which the adjustment would take effect.	PMPM limit calculation	STC 63(a)
Quarterly	Quarterly Monitoring Report	STC 50
Quarterly	CMS-64 Expenditure Reports	STCs 53 & 54

ATTACHMENT A: QUARTERLY REPORT CONTENT AND FORMAT

Under section IX, STC 50, the state is required to submit quarterly progress reports to CMS. The purpose of the quarterly report is to inform CMS of significant demonstration activity from the time of approval through completion of the demonstration. The reports are due to CMS 60 days after the end of each quarter.

The following report guidelines are intended as a framework and can be modified when agreed upon by CMS and the state. A complete quarterly progress report must include an updated budget neutrality monitoring workbook. An electronic copy of the report narrative, as well as the Microsoft Excel workbook, is provided.

NARRATIVE REPORT FORMAT:

Title Line One – Vermont Global Commitment to Health

Title Line Two – Section 1115 Quarterly Report

Demonstration/Quarter Reporting Period:

Example:

Demonstration Year: 6 (10/1/2010 – 9/30/2011)

Federal Fiscal Quarter: 1/2010 (10/01/2010 – 12/31/2010)

Introduction

Information describing the goal of the demonstration, what it does, and key dates of approval/operation. (This should be the same for each report.)

Enrollment Information

Please complete the following table that outlines all enrollment activity under the demonstration. The state should indicate “N/A” where appropriate. If there was no activity under a particular enrollment category, the state should indicate that by “0”.

Enrollment Counts

Note: Enrollment counts should be person counts, not member months.

Demonstration Populations

Current Enrollees – Last day of the quarter: xx/xx/xxxx	Previously Reported Enrollees – Last day of quarter: xx/xx/xxxx	Variance
Demonstration Population 1:		
Demonstration Population 2:		
Demonstration Population 3:		
Demonstration Population 4:		
Demonstration Population 5:		
Demonstration Population 6:		
Demonstration Population 7:		
Demonstration Population 8:		

Outreach/Innovative Activities

Summarize outreach activities and/or promising practices for the current quarter.

Operational/Policy Developments/Issues

Identify all significant program developments/issues/problems that have occurred in the current quarter, including but not limited to: approval and contracting with new plans, benefit changes, and legislative activity. The state must also report on whether any of the HCBW-like programs have waiting lists and an update on the progress of enrolling individuals on the waiting list.

Financial/Budget Neutrality Development/Issues

Identify all significant developments/issues/problems with financial accounting, budget neutrality, and CMS-64 reporting for the current quarter. Identify the state’s actions to address these issues.

Member Month Reporting

Enter the member months for each of the EGs for the quarter.

A. For Use in Budget Neutrality Calculations

Eligibility Group	Month 1	Month 2	Month 3	Total for Quarter Ending XX/XX
Population 1:				
Population 2:				
Population 3:				
Population 4:				
Population 5:				
Population 6:				
Population 7:				
Population 8:				

Consumer Issues

A summary of the types of complaints or problems consumers identified about the program in the current quarter. Include any trends discovered, the resolution of complaints, and any actions taken or to be taken to prevent other occurrences. Also discuss feedback received from the other consumer groups

Quality Assurance/Monitoring Activity

Identify any quality assurance/monitoring activity in current quarter.

Demonstration Evaluation

Discuss progress of evaluation design and planning.

Enclosures/Attachments

Identify by title any attachments along with a brief description of what information the document contains.

State Contact(s)

Identify individuals by name, title, phone, fax, and address that CMS may contact should any questions arise.

Date Submitted to CMS

ATTACHMENT B
Summary of Choices for Care Eligibility
Criteria

Choices for Care Eligibility Group	Choices for Care Clinical Eligibility Categories*			
	Need for Assistance with Activities of Daily	Physical Health Needs	Behavioral Health Needs/Needs Due to Impaired Decision Making	Unique Circumstances
Highest	Extensive or total assistance daily with eating, toileting, bed mobility or transfer and limited assistance with any other activity of daily living (ADL).	Skilled nursing care on a daily basis for a specific condition/ treatment or unstable medical condition.	Severe impairment with decision making or moderate impairment with behavioral symptoms (e.g., wandering, aggression, resistance to care) that occur frequently and are not easily altered.	Loss of primary caregiver; loss of living situation; health and welfare at imminent risk without services; health condition would be at imminent risk or worsen if services are not provided or if services are discontinued.

High	Extensive or total assistance daily with bathing, dressing, eating, toileting, and mobility.	Skilled nursing care, assessment and monitoring of care on less than daily basis but require an aggregate of personal care, nursing care, therapies and/or medical treatments on a daily basis; skilled teaching to regain or maintain certain skills/control.	Impaired judgment or loss of decision making that: <ul style="list-style-type: none"> • Requires controlled environment to maintain safety due to behavioral conditions (e.g., wandering, aggression), or • Requires constant or frequent direction to perform certain ADLs. 	Health and welfare at imminent risk without services; health condition would worsen without services.
Moderate	Supervision or assistance 3 or more times in 7 days with one ADL or combination of ADL and IADL's.	Chronic condition that requires monitoring at least monthly.	Impaired judgment or decision making that requires general supervision on a daily basis.	Worsening health condition without services.

*Persons must meet both clinical and financial eligibility requirements detailed in Vermont rule and policy.

ATTACHMENT C
Choices for Care Services by Demonstration Group

All covered services are subject to medical necessity review. A complete description of covered services and limitations is contained in the Vermont approved title XIX State plan, the Choices for Care Operational Protocol, Vermont statutes, regulations, and policies and procedures.

Definitions of each service may be found in Attachment D.

Type of HCBS Service	Highest Need	High Need	Moderate Need	CRT	Limitations
Adult Day Services	X	X	X	X	Any limitation on this service are defined by Vermont rules and policies.
Assistive Devices and Home Modifications	X	X		X	
Case Management	X	X	X	X	
Companion	X	X		X	Limited in combination with Respite Service.
Homemaker	X	X	X	X	Excluded if participant receives Personal Care services since homemaker activities are included among Personal Care services.
Incidental purchases paid out of cash allotments to participants who are self-directing their services	X	X			Limited to Flexible Choices participants who are self-directing their services.
Nursing Overview	X	X			Limited to participants residing in Enhanced Residential Care.

Type of HCBS Service	Highest Need	High Need	Moderate Need	CRT	Limitations
Personal Care	X	X		X	Includes assistance with ADLs and limited IADLs; laundry, meal preparation; medication management and non-medical transportation.
Personal Emergency Response System	X	X		X	
Respite Care	X	X		X	Limited in combination with Companion Service for individuals residing at home.
Social and Recreational Activities	X	X			Limited to participants residing in Enhanced Residential Care.
Supervision	X	X			Limited to participants residing in Enhanced Residential Care.
Transportation Services	X	X		X	Non-medical transportation. Limited to participants residing in Enhanced Residential Care. Included in Personal Care for individuals residing at home.

ATTACHMENT D
Choices for Care Long-Term Services and Supports Definitions

Long-Term Services and Supports Service Definitions & Waiting List Procedures

Comprehensive descriptions and coverage policies, prior authorization, applicant rules and limitations are defined by the Medicaid State Plan, Vermont statutes and rules and program policies.

Choices for Care
<p>Adult Day Services: Community-based non-residential services that provide a range of professional health, social and therapeutic services delivered in a safe, supportive environment.</p>
<p>Assistive Devices and Home Modifications: An “Assistive Device” is defined as an item which is used to increase, maintain, or improve functional capabilities. Such devices are intended to replace functional abilities lost to the individual because of his or her disability and must be used in performing Activities of Daily Living (ADL) or Instrumental Activities of Daily Living (IADL). A “Home Modification” is defined as a physical adaptation to the home which is necessary to allow safe access to and use of the individual’s primary living space, bathroom, kitchen, or main exit/entrance to the home.</p>
<p>Case Management: Assistance to participants in gaining access to needed long-term care Medicaid services and other state plan and/or medical, social and community services. This includes comprehensive assessment and reassessments, treatment and support planning, obtaining and monitoring the provision of services included in the service care plan and assessing the quality, effectiveness and efficiency of CFC services.</p>
<p>Enhanced Residential Care Home Services: A package of services provided by an approved Level III Residential Care Home (RCH) or an Assisted Living Residence (ALR). In addition to services provided to all RCH/ALR residents, these residential settings also provide a Registered Nurse on-site, personal care services and daily social and recreational activity opportunities.</p>
<p>Adult Family Care: 24-hour care and support option in which participants live in and receive services from an Adult Family Care Home that is contracted by an Authorized Agency.</p>
<p>Companion Care: Non-medical supervision and socialization for participants who are unable to care for themselves.</p>
<p>Homemaker Services: Assistance with activities that help to maintain a safe, healthy environment for individuals residing in their homes. Such services contribute to the prevention, delay, or reduction of risk of harm or hospital, nursing home, or other institutional care.</p>

Personal Care: Assistance with Activities of Daily Living (ADLs) like eating, dressing, walking, transferring, toileting and bathing and Instrumental Activities of Daily Living (IADLs) such as cooking, cleaning and shopping.

Personal Emergency Systems: Electronic devices which enable individuals at high risk to secure help in an emergency.

Respite Care: Alternate caregiving arrangements to facilitate planned short-term and time-limited breaks for unpaid caregivers.

Flexible Choices (Self-Directed Care): Participant- or surrogate-directed home and community-based option, which converts a participant's Home-Based Service Plan into a cash allowance.

Working with a consultant, the participant develops a budget that details expenditure of the allowance and guides the participant's acquisition of services to meet their needs.

Nursing Facility: Health-related services (above the level of room and board) not available in the community, needed regularly due to a mental or physical condition that includes provision of or arranging nursing or related services and specialized rehabilitative services to attain or maintain the highest practicable physical, mental, and psychosocial wellbeing of each resident.

ATTACHMENT E
Global Commitment Specialized Program Service Definitions

Vermont’s specialized programs rely on person-centered planning to develop individualized plans of care. Specialized programs support a continuum of care from short-term crisis or family support to intensive 24/7 home and community-based wraparound services. These programs include both State Plan-recognized and specialized non-State Plan services and providers to support enrollees in home and/or community settings. The state may require: additional provider agreements, certifications or training not found in the State plan; specific assessment tools, level of care or other planning processes; and/or prior authorizations to support these programs. This attachment is for summary purposes only. Complete service definitions, approved provider types, applicant rules, prior authorizations, limitations and exclusions can be found in Vermont statute, rule and policy.

Traumatic Brain Injury Program (TBI) Services
Crisis Support Services: Time-limited services and supports that assist an individual to resolve a severe behavioral, psychological or emotional crisis safely in their community. This includes 24/7 availability, one-to-one support and case management, hospital diversion programs, mobile outreach, community crisis placements and/or intensive in home support.
Psychological and Counseling Supports: Services provided by or under the direction of licensed practitioners that include, but may not be limited to: clinical assessment; medication and psychiatric consultation; individual, family and group therapy; or specialized behavioral or health services.
Case Management: Assistance to enrollees in gaining access to needed waiver, medical, social, educational and other services regardless of the funding source for the services to which access is gained. Case management includes comprehensive assessment; treatment planning and plan of care development; service coordination; monitoring; and collateral contacts with persons involved and/or designated by the enrollee.
Community Supports: Individualized support services that may be provided in a family setting, group home, supervised apartment, other community residential setting or in the individual's own apartment/home. Support may include 24-hour care and supervision as part of authorized treatment plan goals and objectives.
Habilitation: Comprehensive and integrated one-to-one training and support by authorized Life Skills Aides (LSA) to provide training in specific activities of daily living identified in the treatment plan designed to promote independent living and community re-integration.
Respite Care: Alternative caregiving arrangements to facilitate planned short-term and time-limited breaks for caregivers.
Supported Employment: Job coaching, on- and off-site support, and consultation with employers to support competitive employment in integrated community work settings.

Environmental and Assistive Technology: Physical adaptations, devices or technology in the home necessary to ensure health and safety or to enable greater independence. Eligible items may include, but are not limited to: durable medical equipment; safety devices; physical endurance equipment prescribed by a licensed health professional; and accessibility devices and equipment. This may include services/supports, deposits, rentals or other items which are determined to be necessary to improve functional independence.

Self-Directed Care: When an individual, their family or surrogate meets requirements and chooses to manage some or all of their TBI services, the person has the responsibility of hiring his or her own staff and overseeing the administrative responsibilities associated with receiving TBI funding, including contracting for services, developing a service plan, fulfilling the responsibilities of the employer, and planning for back-up support or respite in the case of an emergency.

Services for Children and Youth under 21 Experiencing Severe Emotional Disturbance/ Mental Illness and Their Families
Service Coordination: Case management and assistance to individuals and families in planning, developing, choosing, gaining access to, coordinating and monitoring the provision of medical, social, educational and other services and supports, including discharge planning, advocacy, monitoring and supporting them to make and assess their own decisions.
Community Supports (Individual or Group): Specific, individualized and goal-oriented services that assist individuals in developing skills and social supports necessary to promote growth.
Skilled Therapy Services: Services provided by or under the direction of licensed practitioners that include, but may not be limited to: clinical assessment; medication and psychiatric consultation; individual, family and group therapy; or specialized behavioral and health services.
Residential Treatment: Out-of-home treatment services that include: <ul style="list-style-type: none"> • <u>Transitional Living:</u> Short-term, out-of-home care for adolescents requiring intensive supports in order to transition to independent living. • <u>Therapeutic Foster Care:</u> Short-term, out-of-home care to assist in skill development and remediation of intensive mental health issues to support a return to the family. • <u>Residential Treatment:</u> Intensive out-of-home care for mental health treatment, skill building, family reintegration and/or specialized assessment services to assist recovery and skill building that supports return to the family home.
Flexible Support: <ul style="list-style-type: none"> • <u>Family Education:</u> In-home support and treatment for the purpose of enhancing the family's ability to meet their child's emotional needs. • <u>Specialized Rehabilitation or Treatment Plan Services:</u> Services, supports or devices used to increase, maintain, or improve functional capabilities or health outcomes identified as the result of an approved assessment, treatment plan and/or prior approval.
Counseling: Services directed toward the development and restoration of skills or the elimination of psychosocial barriers that impede the development or modification of skills necessary for independent functioning in the community. Services may include approved peer-supported and recovery services.
Respite: Alternative caregiving arrangements to facilitate planned short-term and time-limited breaks for caregivers.
Supported Employment: Job coaching, on- and off-site support, and consultation with employers to support competitive employment in integrated community work settings.
Crisis Supports: Time-limited services and supports that assist an individual to resolve a severe behavioral, psychological or emotional crisis safely in their community. This includes 24/7 availability, one to one support, and case management, hospital diversion programs, mobile outreach, community crisis placements and/or intensive in home support.

Environmental Safety Devices: Devices or technology necessary to ensure health and safety or to enable independence. This does not include structurally permanent modifications.

Community Rehabilitation and Treatment
<p>Service Coordination: Case management and assistance to individuals and families in planning, developing, choosing, gaining access to, coordinating and monitoring the provision of medical, social, educational and other services and supports, including discharge planning, advocacy, monitoring and supporting them to make and assess their own decisions.</p>
<p>Community Supports: (Individual or Group): Specific, individualized and goal-oriented services which assist individuals in developing skills and social supports necessary to promote growth.</p>
<p>Flexible Support:</p> <ul style="list-style-type: none"> • <u>Day Recovery/Psychoeducation, Including Recovery Education:</u> Group recovery activities in a milieu that promotes wellness, empowerment, a sense of community, personal responsibility, self-esteem and hope. These activities are consumer-centered; they provide socialization, daily skills development, crisis support, and promotion of self-advocacy. • <u>Family Psychoeducation and Support for Families and Significant Others:</u> To support recovery and assist individual in managing their symptoms.
<p>Skilled Therapy Services: Services provided by or under the direction of licensed practitioners that include, but may not be limited to: clinical assessment; individual, group, and family therapy or diagnosis-specific practices; medication evaluation, management and consultation with Primary Care; inpatient behavioral health services; partial hospitalization.</p>
<p>Residential Treatment</p> <ul style="list-style-type: none"> • <u>Residential Treatment:</u> Intensive mental health treatment, skill building, community reintegration and/or specialized assessment services to assist recovery and skillbuilding to support community living, but not provided in institutions for mental disease (IMD). Treatment may include the use of approved peer-supported and peer-run alternatives. • <u>Housing and Home Supports:</u> Mental Health services and supports based on the clinical needs of individuals in and around their residences. This may include support to a person in his or her own home; a family home; sharing a home with others (e.g., in an apartment, group home, shared living arrangement).
<p>Crisis Support: Time-limited services and supports that assist individuals to resolve a severe behavioral, psychological or emotional crisis safely in their community. This includes 24-hour/7-day-a-week availability, one-to-one support, case management, hospital diversion programs, mobile outreach, community crisis placements and/or intensive in home support.</p>

<p>Environmental Safety Devices: Devices or technology necessary to ensure health and safety or to enable independence. This does not include structurally permanent modifications.</p>
<p>Counseling: Services directed toward the development and restoration of skills or the elimination of psychosocial barriers that impede the development or modification of skills necessary for independent functioning in the community. May include approved peer-supported and/or peer-run recovery services.</p>
<p>Respite: Alternative caregiving arrangements to facilitate planned short-term and time-limited breaks for caregivers.</p>
<p>Supported Employment: Job coaching, on- and off-site support, and consultation with employers to support competitive employment in integrated community work settings.</p>

Developmental Disability Services
<p>Service Coordination: Case management and assistance to individuals and families in planning, developing, choosing, gaining access to, coordinating and monitoring the provision of medical, social, educational and other services and supports, including planning, advocacy, monitoring and supporting them to make and assess their own decisions.</p>
<p>Residential Habilitation: Home supports, services and supervision to an individual in and around their residence up to 24 hours a day. This may include support to a person in his or her own home; sharing a home with others (e.g., in an apartment, group home, shared living arrangement); or who lives with his or her family.</p>
<p>Day Habilitation: Community supports that are specific individualized and goal-oriented services which assist individuals in developing skills and social supports necessary to promote positive growth. This may also include support for persons to prevent them from entering more restrictive levels of care such as:</p> <ul style="list-style-type: none"> • <u><i>Flexible Family Funding:</i></u> One-time support to assist a family not receiving other specialized services in maintaining their family member in home and diverting the use of more costly home and community-based services or restrictive levels of care. • <u><i>Specialized Treatment Plan Services:</i></u> Services, supports or devices used to increase, maintain, or improve functional capabilities or health outcomes identified as the result of an approved assessment, plan of care and/or prior approval.
<p>Supported Employment: Job coaching, on- and off-site support, and consultation with employers to support competitive employment in integrated community work settings.</p>
<p>Crisis Services: Time-limited intensive services and supports that assist individuals to resolve a severe behavioral, psychological or emotional crisis safely in their community. This includes 24/7 availability, case management, hospital diversion programs, mobile outreach, community crisis placements and/or intensive in home support.</p>
<p>Clinical Interventions: Assessment, therapeutic, medication or medical services provided by clinical or medical staff.</p>
<p>Respite: Alternative caregiving arrangements to facilitate planned short-term and time-limited breaks for caregivers.</p>
<p>Self-Directed Care: When an individual, their family or surrogate meets requirements and chooses to manage some or all of their developmental services, the person has the responsibility of hiring his or her own staff and overseeing the administrative responsibilities associated with receiving developmental services funding, including contracting for services, developing a service plan, fulfilling the responsibilities of the employer, and planning for back-up support or respite in the case of an emergency.</p>

ATTACHMENT F
Choices for Care Wait List Procedure Description

Choices for Care - Waiting List Procedures High Needs

Active participants who meet the “High Needs” clinical criteria at reassessment will not be terminated from services as long as they continue to meet all other CFC eligibility criteria.

New CFC applicants who meet the “High Needs” clinical criteria may be placed on a waiting list if state funds are not available at the time of referral, using the following procedures:

1. If funds are not available at time of application, Department of Disabilities, Aging and Independent Living (DAIL) staff will complete a High Needs Wait List Score Sheet.
2. A score will be generated based on the individual's Activities of Daily Living (ADL), Cognition, Behavior, Medical Conditions/Treatments and Risk Factors.
3. DAIL staff will then place the individual on a waiting list in order of score.
4. DAIL staff will notify the individual in writing that they have been found clinically eligible for the High Needs Group and have been placed on a wait list. The Case Management (CM) agency that the applicant chose on the application will be in contact with them. Appeal rights will also be included in the notice.
5. DAIL staff will forward a copy of the CFC program application and Wait List Score Sheet to the CM agency indicated on the application. The application will not be sent if the CM agency assisted in completing the application.
6. The case manager/agency will make contact with individuals on the “High Needs” wait list on a monthly basis to monitor if they have had a change in their health or functional needs and complete the High Needs Waiting List Monthly Follow-up Sheet. The initial contact will occur no later than 14 days after receiving the referral.
7. If the individual has had a significant health or functional status change the case manager will contact DAIL staff. DAIL staff shall reassess for clinical eligibility determination and/or rescore for wait list. Agencies are encouraged to use the Triggers for High Needs Wait List Referral for Clinical Review as a guide to determine if another clinical assessment is warranted.
8. DAIL staff and providers will review the wait list with the CFC waiver team at monthly meetings. Each case management agency designee (determined by the CM agency) will ensure that a copy of the follow-up sheet for all applicants on the High Needs wait list monitored by their agency and send to DAIL Waterbury by the 5th of each month. DAIL staff will follow up with the CM agency if any High Needs Waiting List Monthly Follow-up Sheets are missing.
9. Applicants on a waiting list shall be admitted to the Choices for Care waiver as funds become available, according to procedures established by the Department and

implemented by regional Choices for Care waiver teams. The Choices for Care waiver teams shall use professional judgment in managing admissions to the Choices for Care waiver, admitting individuals with the most pressing needs. The teams shall consider the following factors:

- a. Unmet needs for ADL assistance;
- b. Unmet needs for IADL assistance;
- c. Behavioral symptoms;
- d. Cognitive functioning;
- e. Formal support services;
- f. Informal supports;
- g. Date of application;
- h. Need for admission to or continued stay in a nursing facility;
- i. Other risk factors, including evidence of emergency need; and
- j. Priority score.

10. When funding is allocated to an individual, DAIL staff will notify the individual and continue the CFC application process.

Choices for Care Moderate Needs Waiting List

Moderate Needs applicants may be placed on a waiting list if funds are not available or capacity at Adult Day is not available at the time of application, using the following procedures:

1. If funding, or capacity at Adult Day, is not available at time of application, the case manager (CM) will notify the individual in writing and will send a copy of the notice and application to the requested Service Providers.
2. A priority score will be generated by the case manager based on the applicant's
 - a. Current Medicaid eligibility status;
 - b. Unmet needs for IADL assistance;
 - c. Behavioral Symptoms;
 - d. Cognitive functioning;
 - e. Formal support services;
 - f. Informal supports;
 - g. Current status on the Moderate Needs Program (participants adding a new service that has a wait list.
3. The Homemaker Agency or Adult Day provider will place the individual on their waiting list according to the applicant's priority score.
4. Applicants on Community Medicaid are considered first priority,
5. Participants who are already active on Moderate Needs and wish to add a second service will be put on the wait list according to their priority score.

6. The wait list should contain only those people who are still waiting for funding on the last day of the reporting month.
7. The wait list shall not contain the names of people who have an active Moderate Needs service authorization and are waiting for staffing or additional hours.
8. The Moderate Needs Providers must forward a copy of the wait list to DAIL by the 15th of the month following the reporting month. *For example, the January report is due at DAIL by February 15th and must contain everyone waiting for funding as of January 31st.*
9. Providers who have no wait list must either send a blank wait list or send an email to DAIL by the 15th of the month stating they have no wait list.
10. When funding is allocated to an applicant the Moderate Needs Providers will indicate such date on the wait list and notify the Moderate Needs case manager.
11. The CM will notify the applicant when funding becomes available and continue the eligibility process. The CM shall put the date the applicant came off the wait list on the Moderate Needs application.
12. If the individual is already receiving other Moderate Needs services, the CM will complete a Moderate Needs Group Change Form and send to the Moderate Needs Coordinator. The Moderate Needs Coordinator will complete and send a new Service Authorization to the individual, case manager and provider(s).
13. The effective date of the service will be the date the individual was taken off the wait list or a later date as requested by the CM.
14. The DAIL Moderate Needs Coordinator will review the provider's wait list upon receiving a new Moderate Needs application to ensure that Medicaid applicants are served before non-Medicaid applicants.
15. Providers must assure that all people listed on their wait list are still waiting for funding to be served. This is accomplished contacting people on the wait list at least once every six months.

**ATTACHMENT G
Premiums and Co-Payments for Demonstration Populations**

Premiums for children age 0 through age 18 in Population 1 are charged according to the following chart:

Group	Premiums
Children with income > 195% percent through 237% of the FPL	\$15/month/family
Underinsured Children with income > 237% through 312% FPL	\$20/month/family
Uninsured Children with income > 237% through 312% of the FPL	\$60/month/family

Population	Premiums	Co-Payments	State Program Name
Demonstration Population 7: Medicare beneficiaries with income at or below 150 percent of the FPL, who may be enrolled in the Medicare Savings Program (MSP) but are not otherwise categorically eligible for full benefits.	Premiums not to exceed the following: 0-150% FPL: \$15/month/person	Not to exceed the nominal co-payments specified in the Medicaid State plan.	VPharm1
Demonstration Population 8: Medicare beneficiaries with income above 150 percent and up to and including 225 percent of the FPL, who may be enrolled in the Medicare Savings Program (MSP), but are not otherwise categorically eligible.	Premiums not to exceed the following: 151-175% FPL: \$20/month/person 176-225% FPL: \$50/month/person	Not to exceed the nominal co-payments specified in the Medicaid State plan.	VPharm2 or VPharm3

ATTACHMENT H
List of Approved Investments

No.	Investment Name
1.	Residential Care for Youth/Substitute Care
2.	Lund Home: IMD
3.	Institution for Mental Disease Services: DMH
4.	Return House
5.	Northern Lights
6.	Pathways to Housing
7.	Institution for Mental Disease Services: DVHA
8.	Vermont Information Technology Leaders HIT/HIE/HCR
9.	Addison Helping Overcome Poverty's Effects (HOPE) (Challenges for Change)
10.	Vermont Physician Training
11.	Non-state plan Related Education Fund Investments
12.	Mental Health Children's Community Services
13.	Acute Psychiatric Inpatient Services
14.	St. Albans and United Counseling Service Transitional Housing (Challenges for Change)
15.	Northeast Kingdom Community Action
16.	Mental Health CRT Community Support Services
17.	Recovery Centers
18.	Patient Safety Net Services
19.	Emergency Medical Services
20.	Vermont Veterans Home
21.	Area Health Education Centers (AHEC)
22.	Emergency Support Fund
23.	Public Inebriate Program (Challenges for Change)
24.	CHIP Vaccines
25.	Physician/Dentist Loan Repayment Program
26.	Strengthening Families
27.	Flexible Family/Respite Funding
28.	Special Payments for Treatment Plan Services
29.	Emergency Mental Health for Children and Adults
30.	Substance Use Disorder Treatment
31.	Health Laboratory
32.	Health Professional Training
33.	Prevent Child Abuse Vermont: Shaken Baby
34.	Prevent Child Abuse Vermont: Nurturing Parent
35.	Building Bright Futures
36.	Agriculture Public Health Initiatives
37.	WIC Coverage
38.	Fluoride Treatment
39.	Health Research and Statistics

No.	Investment Name
40.	Epidemiology
41.	United Ways 2-1-1
42.	Quality Review of Home Health Agencies
43.	Support and Services at Home (SASH)
44.	Vermont Blueprint for Health
45.	Green Mountain Care Board
46.	Immunization
47.	Patient Safety - Adverse Events
48.	Poison Control
49.	Healthy Homes and Lead Poisoning Prevention Program
50.	Tobacco Cessation: Community Coalitions
51.	Vermont Blueprint for Health
52.	Buy-In
53.	HIV Drug Coverage
54.	Designated Agency Underinsured Services
55.	Medical Services
56.	Aid to the Aged, Blind and Disabled CCL Level III
57.	Aid to the Aged, Blind and Disabled Res Care Level III
58.	Aid to the Aged, Blind and Disabled Res Care Level IV
59.	Essential Person Program
60.	GA Medical Expenses
61.	Therapeutic Child Care
62.	Lamoille Valley Community Justice Project
63.	Mobility Training/Other Services-Elderly Visually Impaired
64.	DS Special Payments for Medical Services
65.	Seriously Functionally Impaired: DAIL
66.	MH Outpatient Services for Adults
67.	Respite Services for Youth with SED and their Families
68.	Seriously Functionally Impaired: DMH
69.	Intensive Substance Abuse Program (ISAP)
70.	Intensive Domestic Violence Program
71.	Community Rehabilitative Care
72.	Family Supports
73.	Renal Disease
74.	TB Medical Services
75.	Family Planning
76.	Statewide Tobacco Cessation
77.	Home Sharing
78.	Self-Neglect Initiative
79.	Mental Health Consumer Support Programs
80.	Intensive Sexual Abuse Prevention Program

No.	Investment Name
81.	OneCare Vermont Accountable Care Organization (ACO) Quality and Health Management Measurement Improvement Investment
82.	OneCare Vermont ACO Advanced Community Care Coordination
83.	One Care Accountable Care Organization Primary Prevention Development Investment
84.	OneCare Vermont Accountable Care Organization Expanded Advanced Community Care Coordination
85.	OneCare Vermont Accountable Care Organization Mental Health Investment
86.	OneCare Vermont Accountable Care Organization Quality and Health Management Measurement Improvement Initiative
87.	Vermont Achievement Center – Mandala and Sanctuary Houses
88.	OneCare Vermont Accountable Care Organization Expanded Advanced Community Care Coordination Team Training, Technical Assistance, and Expansion of the Developmental Understanding and Legal Collaboration for Everyone (DULCE) Model

ATTACHMENT I

Menu of Approvable Delivery System Investments

As described in STC 82, Vermont has a unique investment authority under the Global Commitment to Health demonstration to spend up to annual limits on expenditures for the following purposes:

- a) Reduce the rate of uninsured and/or underinsured in Vermont;
- b) Increase the access to quality health care by uninsured, underinsured, and Medicaid beneficiaries;
- c) Provide public health approaches and other innovative programs to improve the health outcomes, health status and quality of life for uninsured, underinsured and Medicaid-eligible individuals in Vermont; and
- d) Encourage the formation and maintenance of public-private partnerships in health care, including initiatives to support and improve the health care delivery system.

CMS is making funding available under the above investment structure for the state to assist the Accountable Care Organization (ACO) and providers in one-time, developmental start-up funding, as defined in STC 86. STC 87 establishes that Vermont shall notify CMS of delivery system-related investments that fall within the following categories. For investments that do not fall within the categories below, Vermont must follow the notification and CMS review procedures as described in STC 88.

Delivery System-related Investment Categories

The goal of the delivery system-related investments is to support implementation of Vermont's All-Payer Accountable Care Organization (ACO) model.

- Category #1 projects consists of funding to Accountable Care Organization(s). Funding under category #1 is limited to development costs only.
- Category #2 projects consist of funding to providers.

Vermont may select time-limited, start-up delivery system investments in demonstration year (DY) 1 through 4 of the extension period and maintenance investments in DY 5 of the extension period. These are time-limited investments that are expected to phase down and be completed at the end of five years. There may not be start-up investments in DY 5 of the extension period.

A project plan is required for each project and shall include an explanation of how the project will provide a return on investment over the demonstration extension period and how the project could be sustainably funded through the ACO over the five-year demonstration. The state must include metrics for all projects and the metrics are required for all years that the project receives funding.

Category #1: Accountable Care Organization (ACO) Infrastructure Improvement Program

Project funding under category #1 is limited to development costs only. Category #1 projects are only allowed from demonstration year 1 through demonstration year 4 of the extension period.

The state must submit a project plan to CMS at the time the state notifies CMS of the proposed project that includes a phasedown of demonstration funding no later than DY 5 of the extension period.

Eligibility: To be eligible to receive any funding under category #1, the ACO must meet the following criteria:

- Once the Green Mountain Care Board full certification and budget review process is implemented (expected by January 1, 2018), meet the state certification standards set by the Green Mountain Care Board under Vermont Act 113 (2016);
- Sign an agreement with the state consistent with the state's All-Payer Model Accountable Care Organization agreement with the Centers for Medicare & Medicaid Services; and
- Sign an agreement with at least one other payer consistent with the state's All-Payer Model Accountable Care Organization agreement.

Objectives: The ACO must submit a project plan to the state that describes how the funding would help the ACO achieve one or more of the following objectives:

- Develop governance, skills, and capacity to perform under a Medicaid risk-based contract designed to be an integrated part of an all-payer approach;
- Manage enrollees' care across Medicaid providers in a manner consistent with unified processes across payers; and
- Successfully operate without decreased access or quality under population-level spending targets set to prospectively provide affordable per-person spending to the payers, programs and employers covering Vermont residents.

Metrics: Project metrics may include, but are not limited to:

- ACO quality measures included in the contract between DVHA and the ACO;
- Improvement in the ACO quality measures included in the contract between DVHA and the ACO; and
- Increase in the number of community providers participating in the ACO network and level of access to Medicaid enrollees.

Eligible Project Categories: Projects may fall under one or more of the categories of projects identified below in category #1(a) through category #1(b)(4).

Category #1(a): Quality and Health Management Measurement Improvement Projects The purpose of these projects is to provide funding for quality and health improvement information development and dissemination for participating providers of the ACO. Projects under this category must include one or more of the following:

- Learning collaboratives for provider communities to share best practices for using data to support health improvement for Medicaid beneficiaries;
- Technical assistance to providers in setting quality improvement targets for their specific panel of Medicaid patients in order to meet the ACO quality measures or to support the measures in the APM agreement; and

- Technical assistance in testing payment models which reward communities (and their providers across the continuum of care and services) who demonstrate high quality and/or improvement by working together.

Project metrics may include, but are not limited to:

- Yearly participation targets for learning collaboratives which demonstrate greater participation by number or type of provider quality improvement in one or more of the ACO quality measures (<http://dvha.vermont.gov/administration/vermont-medicaid-shared-savings-program-vmssp>); and
- Number of ACO communities who achieve high overall results across a full measure scorecard, or targets identified in the state's Quality Improvement Plan (<http://dvha.vermont.gov/global-commitment-to-health/1vt-gc-cqs-september-15-2015-cms-submission.pdf>).

Category #1(b): Community-Based Population Health Projects The goal of this category of projects is to improve the integration of care for Medicaid beneficiaries by improving relationships between Medicaid's community providers and local hospitals. Projects must be designed, at the local/regional level, to promote integration across all types of care and service providers and targeted to the overall goals, including measures agreed to by the state in the All-Payer ACO Model Agreement or in the state's Quality Improvement Plan. The APM measures include:

- Reducing deaths of Vermont residents related to drug overdose;
- Reducing the number of deaths due to suicide;
- Not increasing the prevalence of COPD, diabetes and hypertension for Vermont residents;
- Increasing the level and consistency in screening, access, and follow-up for mental health and substance abuse issues; and
- Ensuring most Vermonters have a usual primary care physician.

Projects must include one or more of the types of projects described in category #1(b)(1) through #1(b)(4).

Category #1(b)(1) Primary and Secondary Prevention Development projects, including:

- Expanding disease-specific programs to slow or reverse existing disease state and related co-morbidities at the community or local level;
- Building a statewide, community-focused health and wellness program; and
- Tailoring existing prevention programs to specific characteristics of Medicaid beneficiaries, the uninsured or the underinsured.

Metrics may include, but are not limited to: 1) disease-specific improvement targets, 2) an increase of prevention activities in a specific community, and/or 3) number of participants engaged.

Category #1(b)(2) Community-Based Provider Capacity projects to build integration between essential community providers, such as those who provide mental health, substance use disorder,

developmental services, and long-term services and supports, and ACO, to ensure community-based providers have the capacity to participate in quality improvement and health management projects with the ACO, and to ensure that Medicaid community providers are able to participate in the other ACO projects funded by investments.

Metrics include, but are not limited to: 1) an increase in the number of participating community-based providers in the ACO's network or in specific ACO projects.

Category #1(b)(3) Socio-Economic Risk and Mitigation projects to develop a screening profile for socio-economic, environmental, and behavior risks for low-income Vermonters that builds on the Screening, Brief Intervention Referral to Treatment (SBIRT) program. These projects will ensure that individuals' unique needs and challenges are incorporated in care planning and that coordination is expanded beyond medical providers and Medicaid community providers. The purpose is to develop projects promoting a whole-person approach to care that takes into consideration the socio-economic needs of specific individuals.

Metrics may include, but are not limited to: 1) the number of individuals with unique care plans that include addressing socio-economic needs or 2) the number of providers who have integrated the tool into their work flow or electronic medical record.

Category #1(b)(4) Advanced Community Care Coordination projects would organize and expand upon current care management programs to create an efficient and effective approach, eliminating duplication in this arena. The project would include development of capacity to identify individuals needing supplemental coordination and management through risk scoring and other methods. This will involve codifying more standardized levels of care coordination, and developing programs and plans to best deliver the services based on existing capacity and community approaches. For example, projects would develop formats for shared care plans for complex (high risk scoring) patients and enhancement of existing community-based care management programs where necessary to meet the population health measures.

Metrics include, but are not limited to: 1) patients under active management, 2) percentage of patients engaged out of those who meet the criteria, and 3) the utilization and quality outcomes for patients under the more coordinated and advanced coordinated care management system.

Category #2: Medicaid Community Provider Integration Program ("Medicaid Pathway")

Goal: The goal of these projects is to assist Vermont's Medicaid community-based service providers to be able to manage population health for Medicaid beneficiaries and be able to participate in the All-Payer model, including being able to accept value-based and risk-based payments.

Target: The following providers will propose projects under this category: Medicaid community-based providers, including designated mental health, disability support, substance use disorder providers and long-term services and support providers.

Metrics include, but are not limited to: 1) targets identified in the Agency's comprehensive quality strategy, 2) the ACO measures included in the Medicaid contract, or 3) the APM measures included in the APM agreement with CMS.

ATTACHMENT J
Investment Application Template

During the extension negotiations, CMS reviewed the current 80 investments. For each new investment, the state must submit the following information to CMS as described in STC 87.

Date	
Investment Title	
Estimated Amount	
Time Period	
Department	
Category	
Project Objective (Must be time-limited)	
Project Description, including Phase-down Strategy	
Project Outcomes	
Project Specific Measurements (include measures and targets for each measure)	
How does the state ensure there is no duplication of federal funding?	
Source of non-federal share	
How does the project provide a return on investment?	
How does the state ensure that the investment does not include any activities listed in STC #85 (Investment Approval Process)?	
Performance Monitoring Plan	
The state assures that in reporting cost, the state and providers must adhere to 45 CFR §75 Uniform Administration Requirements, Cost Principles, and Audit Requirements for Health and Human Services (HHS) Awards and 42 CFR §413 Principles of Reasonable Cost Reimbursement. Pursuant to 45 CFR §75.302(a) the state must have proper fiscal control and accounting procedures in place to permit the tracing of funds to a level of expenditures adequate to establish that such funds have not been used in violation of applicable statutes. Costs must be supported by adequate source documentation.	

ATTACHMENT K
Evaluation Design

State of Vermont
Agency of Human Services



Global Commitment to Health
Section 1115 Medicaid Demonstration
11-W-00194/1

Final Evaluation Design
Extension Period January 1, 2017 – December 31, 2021
Amended June 6, 2018, Effective July 1, 2018 (SUD IMD)
Amended December 5, 2019, Effective January 1, 2020
(SMI IMD)

Revised Design Submitted to CMS June 1, 2020
Final Design Submitted to CMS December 4, 2020

TABLE OF CONTENTS

I.	GENERAL BACKGROUND INFORMATION.....	2
A.	Demonstration Goals.....	4
B.	Public Managed Care Delivery System, Investments and All-Payer Model.....	5
C.	Eligibility, Benefits and Cost Sharing.....	8
D.	Specialized Programs.....	10
E.	Institutions for Mental Diseases (IMD) Treatment.....	11
II.	EVALUATION QUESTIONS, HYPOTHESES AND MEASURES.....	16
A.	Comprehensive Quality Strategy, Rapid Cycle Assessment, SUD and SMI Monitoring Protocols.....	16
B.	Demonstration Driver Diagrams and SMI IMD Amendment Logic Model.....	17
C.	Hypothesis.....	27
D.	Data Collection and Assurances.....	40
E.	Performance Measures, Data Source, Frequency and Sampling Methods.....	42
III.	EVALUATION DESIGN AND METHODS.....	44
A.	Design.....	44
B.	Target and Comparison Population.....	49
C.	Data Analysis.....	50
D.	Data Collection and Validation.....	53
IV.	METHODOLOGICAL LIMITATIONS.....	56
A.	Data Limitations.....	56
B.	Design Limitations.....	57
	ATTACHMENTS.....	59
1.	Procurement Strategy and Evaluator Qualifications.....	60
2.	Evaluation Timeline.....	61
3.	AHS Proposed Evaluation Budget.....	64

I. GENERAL BACKGROUND INFORMATION

The Vermont Global Commitment to Health Medicaid Section 1115(a) demonstration (11-W-00194/1) was originally approved on September 27, 2005 and implemented on October 1, 2005. The Global Commitment to Health Section 1115(a) demonstration is designed to use a multi-disciplinary approach to comprehensive Medicaid reform, including the basic principles of public health, the fundamentals of effective administration of a Medicaid managed care delivery system, public-private partnership, and program flexibility.

This evaluation design supports the Global Commitment to Health extension period January 1, 2017 – December 31, 2021, including a June 6, 2018 amendment (effective July 1, 2018) for Substance Use Disorder (SUD) treatment and recovery services; and a December 5, 2019 amendment, effective January 1, 2020 for inpatient psychiatric care services for adults with a serious mental illness (SMI). Both of these amendments authorize short term stays in treatment facilities classified as Institutions for Mental Diseases (IMD).

As of January 1, 2017, Vermont and CMS extended the Global Commitment to Health demonstration through 2021, to further promote delivery system and payment reform to meet the mutual goals of the State, Center for Medicaid and CHIP Services, and the Center for Medicare and Medicaid Innovation (CMMI). Consistent with Medicare's payment reform efforts the demonstrations allow for alignment across public payers. Specifically, Vermont expects to demonstrate its ability to achieve universal access to health care, cost containment, and improved quality of care.

Since 2005, the Global Commitment to Health demonstration has reduced Vermont's uninsured rate from 11.4 percent in 2005 to approximately 2.7 percent in 2015 through expansion of eligibility and other Accountable Care Act reforms. The demonstration also has enabled Vermont to address and eliminate bias toward institutional care and offer cost-effective, community-based services. For example, the proportion of Choices for Care participants served in the community has passed fifty percent and continues to increase. In addition, Vermont no longer has a waiting list for individuals in the Highest and High Need Groups under the Choices for Care component of the demonstration.

Due to the expansion of eligibility under the Vermont State Plan, pursuant to the Affordable Care Act, expansion of eligibility is no longer the primary focus of the demonstration. However, the demonstration continues to promote delivery system reform and cost-effective community-based services as an alternative to institutional care. The Global Commitment demonstration seeks to improve the health status of all Vermonters by:

- Promoting delivery system reform through value-based payment models and alignment across public payers;
- Increasing access to affordable and high-quality health care by assisting lower-income individuals who can qualify for private insurance through the Marketplace;
- Improving access to primary care;
- Improving the health care delivery for individuals with chronic care needs; and
- Allowing beneficiaries, a choice in long-term services and supports and providing an array of home and community based (HCBS) alternatives recognized to be more cost-effective than institutional based supports.

The State employs four major elements in achieving the above goals:

1. **Program Flexibility:** Vermont has the flexibility to invest in certain specified alternative services and programs designed to achieve the demonstration's objectives (including the Marketplace subsidy program).
2. **Managed Care Delivery System:** Under the demonstration the Agency for Human Services (AHS) executes an annual agreement with the Department of Vermont Health Access (DVHA), which delivers services through a managed care-like model, subject to the requirements that would be applicable to a non-risk pre-paid inpatient health plan (PIHP) as defined by the Special Terms and Conditions (STCs).
3. **Removal of Institutional Bias:** Under the demonstration, Vermont provides a choice of settings for delivery of services and supports to older adults, people with serious and persistent mental illness, people with physical disabilities, people with developmental disabilities, and people with traumatic brain injuries who meet program eligibility and level of care requirements.
4. **Delivery System Reform:** Under the demonstration, Vermont supports systemic delivery reform efforts using the payment flexibility provided through the demonstration to create alignment across public and private payers.

The initial Global Commitment to Health and Choices for Care demonstrations were approved in September of 2005 and became effective October 1, 2005. The Global Commitment to Health demonstration was extended for three years, effective January 1, 2011, and again for three (3) years, effective October 2, 2013. The Choices for Care demonstration was extended for five (5) years effective October 1, 2010 and became part of the Global Commitment to Health demonstration in January 2015. The following amendments have been made to the Global Commitment to Health demonstration:

- 2007: A component of the Catamount Health program was added, enabling the State to provide a premium subsidy to Vermonters who had been without health insurance coverage for a year or more, have incomes at or below 200 percent of the Federal Poverty Level (FPL), and who do not have access to cost-effective employer-sponsored insurance, as determined by the State.
- 2009: The State extended Catamount Health coverage to Vermonters at or below 300 percent of the FPL.
- 2011: The State included a palliative care program for children who are at or below 300 percent of the FPL and have been diagnosed with life limiting illness that would preclude them from reaching adulthood. This program allows children to receive curative and palliative care services such as expressive therapy, care coordination, family training and respite for caregivers.
- 2012: CMS provided authority for the State to eliminate the \$75 inpatient admission co-pay and to implement nominal co-payments for the Vermont Health Access Plan (VHAP) as articulated in the Medicaid state plan.
- 2013: CMS approved the extension of the Global Commitment to Health demonstration

which included sun-setting the authorities for most of the Expansion Populations, including Catamount Health coverage, because these populations would be eligible for Marketplace coverage beginning January 1, 2014. The extension also added the New Adult Group under the State Plan to the population affected by the demonstration effective January 1, 2014. Finally, the extension also included premium subsidies for individuals enrolled in a qualified health plan whose income is at or below 300 percent of the FPL.

- 2015: In January 2015, the Global Commitment to Health demonstration was amended to include authority for the former Choices for Care demonstration. In addition, the State received Section 1115 authority to provide full Medicaid State Plan benefits to pregnant women who are determined presumptively eligible.
- 2018: Effective July 1, 2018 the demonstration was amended to allow for otherwise covered 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).
- 2019: Effective January 1, 2020 the demonstration was amended to allow for otherwise covered services furnished to otherwise eligible individuals who are receiving short-term psychiatric treatment in facilities that meet the definition of an IMD.

A. Demonstration Goals

The State's high-level goal for all health reforms is to create an integrated health system able to achieve the Institute of Medicine's "Triple Aim" goals of improving patient experience of care, improving the health of populations, and reducing per-capita cost.¹ This is supported in the Global Commitment to Health demonstration through supporting innovative delivery system reforms, including Medicaid Accountable Care Organizations (ACO) and the development of progressive in-home and community-based services and supports that are cost-effective and support persons who have long-term care service and support needs, complex medical, mental health and/or substance use disorder treatment needs. Overarching demonstration goals are described below:

- **To increase access to care:** All enrollees must have access to comprehensive care, including financial, geographic, physical, and communicative access. This means having health insurance, appropriate providers, timely access to services, culturally sensitive services, and the opportunity for second opinions as needed.
- **To contain health care cost:** Cost-effectiveness takes into consideration all costs associated with providing programs, services, and interventions. It is measurable at the category-of-service, individual enrollee, aid category, and aggregate program levels.
- **To improve the quality of care:** Quality refers to the degree to which programs/services and

¹ Crossing the Quality Chasm: A New Health System for the 21st Century. Washington DC: National Academy Press, Institute of Medicine; 2001.

activities increase the likelihood of desired outcomes. The six domains necessary for assuring quality health care identified by the Institute of Medicine (IOM, 2001) are:

- *Effectiveness*: Effective health care provides evidence-based services to all who can benefit, refraining from providing services that are not of benefit;
 - *Efficiency*: Efficient health care focuses on avoiding waste, including waste of equipment, supplies, ideas, and energy;
 - *Equity*: Equal health care provides care without variation in quality due to gender, ethnicity, geographic location, or socioeconomic status;
 - *Patient Centeredness*: Patient-centered care emphasizes a partnership between provider and consumer;
 - *Safety*: Safe health care avoids injuries to consumers from care that is intended to help; and
 - *Timeliness*: Timely health care involves obtaining needed care and minimizing unnecessary delays in receiving care.
- **To eliminate institutional bias**: By allowing specialized program participants choices in where they receive long-term services and supports and by offering a cost-effective array of in-home and community services for older adults, people with serious and persistent mental illness, people with developmental disabilities and people with traumatic brain injuries who meet program eligibility and level of care requirements.

B. Public Managed Care Delivery System, Investments and All-Payer Model

Vermont operates the demonstration using a managed care-like model that complies with federal regulations at 42 CFR part 438 that would be applicable to a non-risk PIHP, including beneficiary rights and protections such as independent beneficiary support systems and formal grievance and appeal procedures.

In addition to the demonstration, the State also has implemented the Vermont All-Payer Accountable Care Organization Model Agreement (All-Payer Model), Section 1115A Medicare demonstration through the Center for Medicare and Medicaid Innovation (CMMI). The All-Payer Model Medicare demonstration and the Global Commitment to Health Medicaid demonstration are expected to complement each other to support systemic delivery reform efforts. Using the payment flexibility provided through both demonstrations, alignment across public and private payers is expected. A brief description of the Medicaid public managed care-like model and current reform efforts is provided below.

Public Managed Care-Like Model

The Agency of Human Services (AHS), as Vermont's Single State Medicaid Agency, is responsible for oversight of the managed care-like Medicaid delivery system. The Department of Vermont Health Access (DVHA) operates the Medicaid program as if it were a non-risk PIHP in accordance with federal managed care regulations. Program requirements and responsibilities are delineated in an inter-governmental agreement (IGA) between AHS and DVHA. DVHA also has sub-agreements with the other State entities that provide specialty care for Global Commitment enrollees (e.g., mental health services, developmental disability services, and specialized child and family services).

As such, since the inception of the Global Commitment demonstration, DVHA and its IGA partners have modified operations to meet Medicaid managed care requirements, including requirements related to network adequacy, access to care, beneficiary information, grievances, quality assurance, and quality improvement. Per the External Quality Review Organization's annual findings, DVHA and its IGA partners have achieved exemplary compliance rates in meeting Medicaid managed care requirements.

Departments of Vermont State government that participate in the provision of covered services to enrollees under the demonstration are outlined, in brief, below.

Department of Vermont Health Access (DVHA): DVHA, which operates the Medicaid program as if it were a non-risk PHIP under the Global Commitment demonstration, has a three-fold mission:

- To assist beneficiaries in accessing clinically appropriate health services;
- To administer Vermont's public health insurance system efficiently and effectively; and
- To collaborate with other health care system entities in bringing evidence-based practices to Vermont Medicaid beneficiaries.

Department of Mental Health (DMH): The mission of DMH is to promote and improve the mental health of Vermonters and to provide Vermonters with access to effective prevention, early intervention, and mental health treatment and supports as needed to live, work, learn, and participate fully in their communities. DMH consists of two programmatic divisions: Adult Mental Health Services Division and the Child, Adolescent, and Family Mental Health Services Division. DMH has primary responsibility for overseeing the quality of psychiatric and mental health care provided for two of Vermont's Special Health Needs populations defined under the Global Commitment demonstration, including persons with a severe and persistent mental illness and children who are experiencing a severe emotional disturbance.

Department of Disabilities, Aging, and Independent Living (DAIL): DAIL assists older Vermonters and people with disabilities to live as independently as possible. It provides support to families of children with disabilities to help maintain them in their home. It helps adults with disabilities find and maintain meaningful employment, and it ensures quality of care and life for individuals receiving health care and/or long-term care services from licensed or certified health care providers. DAIL also protects vulnerable adults from abuse, neglect, and exploitation and provides public guardianship to elders and people with developmental disabilities. DAIL operates programs for three of Vermont's five Special Health Needs populations under the demonstration including, Choices for Care, Developmental Disability Services and Traumatic Brain Injury Services.

Vermont Department of Health (VDH): VDH's goal is to have the nation's premier system of public health, enabling Vermonters to lead healthy lives in healthy communities. VDH leads the state and communities in the development of systematic approaches to health promotion, safety, and disease prevention. VDH continuously assesses, vigorously pursues, and documents measurable improvements to the health and safety of Vermont's population. VDH will succeed through excellence in individual achievement, organizational competence, and teamwork within and outside of VDH. VDH's Division of Alcohol and Drug Abuse Programs supports the innovated Medicaid Health Home program for Medication Assisted Opioid Treatment in partnerships and the 2018 SUD amendment with DVHA, as well as extensive outpatient and residential treatment and recovery support for alcohol and other drugs use disorders.

Department for Children and Families (DCF): DCF promotes the social, emotional, physical, and economic well-being of Vermont's children and families. It achieves this mission by providing Vermonters with protective, developmental, therapeutic, probation, economic, and other support services. DCF works in

statewide partnership with families, schools, businesses, community leaders, and service providers. DCF offers specialized Medicaid services to children and families at risk of or experiencing trauma and early childhood intervention for families with children birth to age six with developmental needs.

Agency of Education (AOE): The AOE is responsible for overseeing coverage and reimbursement under the School-Based Health Services program. The Medicaid School-Based Health Services Program is used by the State to support health-related services provided to special education students who are enrolled in Medicaid and receive eligible services in accordance with their Individualized Education Plans (IEPs). The AOE is established as an “Organized Delivery System” under Medicaid and is responsible for the program adherence to all State and Federal Medicaid and Education laws and regulations.

Delivery System Investments

Under the public managed care-like model, the demonstration provides the State with flexibility to invest in health care innovations that:

- a. Reduce the rate of uninsured and/or underinsured in Vermont;
- b. Increase the access to quality health care by uninsured, underinsured, and Medicaid beneficiaries;
- c. Provide public health approaches and other innovative programs to improve the health outcomes, health status and quality of life for uninsured, underinsured and Medicaid-eligible individuals in Vermont; and
- d. Encourage the formation and maintenance of public-private partnerships in health care, including initiatives to support and improve the health care delivery system and promote transformation to value-based and integrated models of care.

In addition, CMS has provided the State with one-time spending authority to support Accountable Care Organizations and Medicaid community providers in delivery system reform through activities such as, but not limited to:

- Infrastructure improvement;
- Quality and health improvement information development and dissemination;
- Community related population health projects;
- Socio-economic risk assessment and mitigation; and
- Provider integration to build integration across physical health, mental health substance use disorder treatment and long-term services and supports.

Investment awards are expected to give preference to activities that promote collaboration, build capacity across the care continuum, consider social determinates of health, and promote an integrated health care system consistent with the framework set forth in the Vermont All-Payer Model Agreement and the Global Commitment demonstration. Specifically, the State would like to encourage ACO-based provider led reform that features (a) collaboration between providers, (b) reimbursement models that move away from Fee-For-Service payment, and (c) rigorous quality measurement that aligns with the All-Payer Model quality framework.

All-Payer Model Alignment

The All-Payer Model agreement between the State and the Federal government was approved by the Green Mountain Care Board (GMCB) on October 26, 2016 and signed by the Governor and the U.S. Secretary of Health and Human Services on October 27, 2016. The agreement includes a target for a sustainable rate of growth for health care spending in Vermont across Medicaid, Medicare, and commercial payers, and builds on past programs like Vermont's Medicaid and commercial Shared Savings programs. This model focuses on a set of health care services roughly equivalent to Medicare Parts A and B (hospital and physician services). The agreement includes quality and performance measurement and Next Generation's value-based payment models, such as capitation or global budgets. The State must provide a plan in 2020 for integrating any institutional long-term services and supports in the total cost of care in the next demonstration period.

The All-Payer Model Agreement and Global Commitment Medicaid demonstration are complementary frameworks that support Vermont's health care reform efforts. Each agreement provides federal support to further Vermont's strategic goal of creating an integrated health care system, including increased alignment across payers and providers.

C. Eligibility, Benefits and Cost Sharing

Eligibility under the demonstration includes the following Medicaid and demonstration groups:

Population 1: Mandatory State Plan populations (except for the new adult group). This group receives benefits as described in the Medicaid State Plan and may receive HCBS benefits described in the STCs if they meet additional program eligibility standards.

Population 2: Optional State Plan populations. This group receives benefits as described in the Medicaid State Plan and may receive HCBS benefits described in the STCs if they meet additional program eligibility standards.

Population 3: Affordable Care Act new adult group. This group receives benefits as described in the Medicaid State Plan and may receive HCBS benefits described in the STCs if they meet additional program eligibility standards.

Population 4: Individuals receiving home and community based waiver (HCBW)-like services who meet the clinical standard in the Choices for Care program for the Highest Need Group. This group receives benefits as described in the Medicaid State Plan and Choices for Care program benefits as described in the STCs.

Population 5: Individuals receiving HCBW-like services who met the clinical standard in the Choices for Care program for the High Need Group. This group receives benefits as described in the Medicaid State Plan and Choices for Care program benefits as described in the STCs.

Population 6: Individuals who are not otherwise eligible under the Medicaid State Plan and who would not have been eligible had the state elected eligibility under 42 CFR 435.217, but are at risk for institutionalization and need home and community-based services. This group receives a limited HCBW-

like service benefit including Adult Day Services, Case Management, and Homemaker services in the Choices for Care program as outlined in the (STCs).

Population 7: Medicare beneficiaries who are 65 years or older or have a disability with income at or below 150 percent of the FPL, who may be enrolled in the Medicare Savings Program (MSP) but are not otherwise eligible for full benefits. This group receives a limited pharmacy benefit including Medicaid Prescriptions, eyeglasses and related eye exams; MSP beneficiaries also receive benefits as described in the Title XIX state plan.

Population 8: Medicare beneficiaries who are 65 years or older or have a disability with income above 150 percent and up to and including 225 percent of the FPL, who may be enrolled in the MSP, but are not otherwise eligible for full benefits. This group receives a limited pharmacy benefit including maintenance Drugs; MSP beneficiaries also receive benefits as described in the Title XIX state plan.

All covered services may be subject to review and prior approval by DVHA and/or its partner departments in the Agency of Human Services, based on medical appropriateness. A complete listing of covered services and limitations are contained in the Vermont approved Title XIX State Plan, Vermont statutes, regulations, and policies and procedures.

Premiums and cost-sharing for populations 1, 2, and 3, must follow Medicaid requirements that are set forth in statute, regulation and policy. Standard Medicaid exemptions from cost-sharing set forth in 42 CFR 447(b) apply to the demonstration. The state must not apply co-payment requirements to excluded populations (children under age 21, pregnant women or individuals in long-term care facilities) or for excluded services/supplies (e.g., family planning).

Vermont charges premiums for children through age 18 in families with income above 195 percent of the FPL through 312 percent of the FPL. Premium populations are outlined in Exhibit 1-1 below.

Exhibit 1-1: Vermont Premium Populations

Population	Premiums	Co-Payments	State Program Name
Children with income > 195% percent through 237% of the FPL	\$15/month/family	N/A	Dr. Dynasaur
Underinsured Children with income > 237% through 312% FPL	\$20/month/family	N/A	Dr. Dynasaur
Uninsured Children with income > 237% through 312% of the FPL	\$60/month/family	N/A	Dr. Dynasaur
Medicare beneficiaries with income at or below 150 percent of the FPL, who may be enrolled in the Medicare Savings Program but are not otherwise categorically eligible for full benefits (Demonstration Population 7).	0-150% FPL: \$15/month/person	Not to exceed the nominal co-payments specified in the Medicaid State plan.	VPharm1
Medicare beneficiaries with income above 150 percent and up to and including 225 percent of the FPL, who may be enrolled in the Medicare Savings Program, but are not otherwise categorically eligible (Demonstration Population 8).	151-175% FPL: \$20/month/person 176-225% FPL: \$50/month/person	Not to exceed the nominal co-payments specified in the Medicaid State plan.	VPharm2; VPharm3

D. Specialized Programs

Under the Global Commitment demonstration, Vermont is authorized to provide an array of cost-effective in-home and community services. Providers of these services must meet designation, certification and/or additional licensing requirements to be approved by the State to serve the most vulnerable of Vermont's citizens. These specialized programs are designed to support a unique group of beneficiaries, each is outlined below.

- *Choices for Care*: long-term services and supports for persons with disabilities and older Vermonters. The demonstration authorizes HCBS waiver-like and institutional services such as: nursing facility; enhanced residential care; personal care; homemaker services; companion care; case management; adult day services; and adult family care.
- *Developmental Disability Services*: provides long-term services and supports for persons with intellectual disabilities. The demonstration authorizes HCBS waiver-like services, including service coordination, residential habilitation, day habilitation, supported employment, crisis services, clinical intervention, respite and self-directed care.
- *Traumatic Brain Injury Services*: provides recovery oriented and long-term services and supports for persons with a traumatic brain injury. The demonstration authorizes HCBS waiver-like services including crisis/support services, psychological and counseling supports, case management, community supports, habilitation, respite care, supported employment, environmental and assistive technology and self-directed care.
- *Intensive Home and Community Based Services (formerly Enhanced Family Treatment)*: provides intensive in-home and community treatment services for children who are experiencing a severe emotional disturbance and their families. The demonstration authorizes HCBS waiver-like services including service coordination, flexible support, skilled therapy services, environmental safety devices, counseling, residential treatment, respite, supported employment, crisis and community supports.
- *Community Rehabilitation and Treatment Program*: provides recovery oriented, in-home and community treatment services for adults who have a severe and persistent mental illness. The demonstration authorizes HCBS waiver-like services including service coordination, flexible support, skilled therapy services, environmental safety devices, counseling, residential treatment, respite, supported employment, crisis and community supports.

Through a special provision as a Designated State Health Program, Community Rehabilitation and Treatment benefits can be extended to individuals with severe and persistent mental illness with incomes between 133 and 150 percent of the federal poverty level, under the demonstration.

In addition, the demonstration authorizes the following initiatives:

- *Children's Palliative Care Program*: provides care coordination, respite care, expressive therapies, family training, and bereavement counseling, for children under the age of 21 years in populations 1, 2, and 3 who have been diagnosed with a life-limiting illness that is expected

to be terminal before adulthood.

- Adult Hospice Program: allows for hospice services to be delivered concurrently with curative therapy to adults in populations 1, 2, and 3.

Lastly, as a Designated State Health Program, the demonstration allows:

- Marketplace Subsidies: The State offer subsidies for premiums for individuals with incomes at or below 300 percent of the federal poverty level who are purchasing health care coverage from a Qualified Health Plan in Marketplace. The program is known as Vermont Premium Assistance (VPA) as part of the state-based health benefits exchange.

E. Institutions for Mental Diseases (IMD) Treatment

Since its inception, Vermont's demonstration has included payment flexibilities to support cost-effective alternatives to traditional Medicaid State Plan benefits. As part of its original 1115 demonstration for the Vermont Health Access Plan (VHAP) Medicaid Expansion, Vermont received a waiver of the IMD exclusion. This waiver, effective January 1, 1996, permitted Vermont to reimburse IMDs for individuals enrolled under the 1115 demonstration. The rationale behind this waiver was to permit the use of IMDs as alternatives to potentially more costly, general acute hospital services.

In 2004, CMS elected to no longer grant IMD waivers under its 1115 demonstration authority; states with existing IMD waivers (including Vermont) were given a schedule to phase out available Medicaid reimbursement. Under the phase-out terms Vermont was permitted to continue Medicaid reimbursement of IMD services through Calendar Year 2004; and reimbursement was limited to 50% of allowable expenditures in Calendar Year 2005.

The Global Commitment to Health demonstration, approved in 2005, historically enabled Vermont to operate under a statewide, public managed care model. The Global Commitment demonstration provided the State with additional flexibility regarding health care service financing, including the purchase of healthcare services that are not traditionally covered by Medicaid. Vermont used this authority previously to purchase alternative services, provided that such services:

- Are determined to be medically appropriate;
- Are delivered by a licensed (and not Medicare de-certified) healthcare provider; and
- Achieve program objectives related to cost, quality and/or access to care in the least restrictive, clinically appropriate setting possible.

Since 2005 Vermont has used its public managed care model authority under Global Commitment to purchase in-state residential SUD treatment in lieu of more costly hospital-based care.

In 2011, the former State psychiatric hospital was shut down by Tropical Storm Irene. As part of the planning process for building a new 25-bed State psychiatric hospital, post- Tropical Storm Irene, Vermont sought clarification from CMS in 2012 regarding its authority to access Medicaid funding, once certified, to support the new facility. In response to this request, CMS indicated that costs of psychiatric inpatient services for individuals between the ages of 21 and 65 residing in an IMD could not be included in the calculating the annual Medicaid managed care PMPM limits. However, Vermont was assured by

CMS that it had authority under the demonstration to fund IMD services by using its “managed care savings.” Vermont planned the construction of the Vermont Psychiatric Care Hospital and entered into a new agreement with the Brattleboro Retreat, a free-standing psychiatric and addictions treatment center, to operate a new, specialized 14-bed unit for individuals with the highest level of acuity.

In 2017, the demonstration’s operating model was modified to that of a non-risk Prepaid Inpatient Health Plan (PIHP). CMS and Vermont collaborated over several years to move FFP for these vital psychiatric treatment services from the former ‘service in lieu of’ and ‘investment’ expenditure categories to the IMD demonstration authority. The final SMI amendment preserves important access to inpatient care for Vermont Medicaid beneficiaries.

SUBSTANCE USE DISORDER IMD TREATMENT

In 2018, Vermont was granted approval to amend the demonstration to include SUD IMD authority to sustain the continuum of treatment programs, including inpatient treatment, detoxification and residential treatment for SUD, in IMD settings, for Members whose needs align with the American Society of Addiction Medicine (ASAM) placement criteria and treatment guidelines.

In addition to the overall demonstration goals presented in Section I.(A) above, the goals for the continuation and enhancement of SUD programs in Vermont include:

1. Increased rates of identification initiation, and engagement in treatment;
2. Increase adherence to and retention in treatment;
3. Reductions in overdose deaths, particularly those due to opioids;
4. Reduced utilization of emergency department and inpatient hospital settings for treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services;
5. Fewer readmissions to the same or higher level of care where the readmission is preventable or medically inappropriate; and
6. Improved access to care for physical health conditions among beneficiaries.

These SUD amendment goals align with overall goals of the overall Global Commitment demonstration as illustrated in Exhibit 1-2.

Exhibit 1-2: SUD Amendment Goal Alignment

Global Commitment to Health Goals	SUD Amendment Goals
To increase access to care	Increase rates of identification, initiation, and engagement in treatment (Goal #1)
	Improve access to care for physical health conditions among beneficiaries (Goal #6)
To improve the quality of care	Increase adherence to and retention in treatment (Goal #2)
	Reduce overdose deaths, particularly those due to opioids (Goals #3)
	Reduce utilization of emergency departments and inpatient hospital settings for treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services (Goal #4)
To eliminate institutional bias	Reduce readmissions to the same or higher level of care where the readmission is preventable or medically inappropriate (Goal #5)

SUD residential treatment facilities that are considered IMD’s as of November 2018 are described in Exhibit 1-3.

Exhibit 1-3: Type and Size of SUD IMD Facilities as of November 2018

Facility	Type and Target Group(s)	# of beds
Lund Home	Residential treatment for pregnant and parenting women w/children under 5 years old. Both mothers and children live on-site. Pregnant women may enroll in the program for the length of their pregnancy and through a post-partum period based on their individual needs	26
Valley Vista - Bradford	Residential treatment for women, men, and adolescents	80
Valley Vista - Vergennes	Residential treatment for women	19
Serenity House	Residential treatment adults	24
Brattleboro Retreat: SUD Program	Inpatient detoxification and treatment for adults	30

PSYCHIATRIC IMD TREATMENT

In December of 2019, CMS approved federal financial participation (FFP) for IMD services, provided to adult enrollees with a serious mental illness (SMI), under a demonstration amendment. The amendment, effective January 1, 2020, transitions authority for these services from the Global Commitment Investments to the IMD waiver authority granted under the amendment. Parameters of the agreement exclude stays for forensic purposes and clinically necessary stays over 60 days. CMS concurrently approved the State's SMI Implementation Plan. The SMI Implementation Plan outlines Vermont's alignment with CMS-defined milestones for the mental health system and psychiatric IMD treatment. IMD facilities included in the demonstration are free standing psychiatric care hospitals (see Exhibit 1-4). Vermont's delivery system does not currently include residential (non-hospital based) psychiatric IMD facilities.

Exhibit 1-4: Psychiatric IMD Facilities

Facility	Type and Target Group(s)	# of beds*
Vermont Psychiatric Care Hospital	Inpatient hospital services for adults	25
Brattleboro Retreat: Psychiatric Treatment Program	Inpatient hospital services for adults	53

* Number of adult bed capacity as of Sept 2020; the Brattleboro Retreat is discussing the potential for an additional 12 psychiatric care beds with the State.

Over the past 30 years, Vermont has accomplished a virtually complete deinstitutionalization of its programs for individuals with mental illness. Following the closure of 54 beds at the former Vermont State Hospital due to flooding in 2011, the State replaced the aging facility with a 25-bed State Psychiatric Care Hospital which opened in July of 2014. The Vermont mental health system is reliant on a network of private non-profit community mental health centers, hospitals and specialized treatment providers to support persons with mental health challenges, including those with a serious and persistent mental illness, in their homes and communities. The State's emergency mental health response includes mobile crisis services, mental health staff embedded with local police, psychiatric stabilization services, including community crisis beds in apartment-like settings. Hospital diversion and step-down facilities are also available for individuals who may need intensive recovery services on a short-term or intermittent basis.

The Commissioner of the Department of Mental Health (DMH) is responsible for supervising the operations of hospitals that provide inpatient care for individuals with mental illness (18 V.S.A. § 7401). To compliment Vermont's long-standing commitment to individualized integrated mental health care in home and community-based settings, the State has developed a decentralized system of adult inpatient care using a Designated Hospital system. Persons in need of psychiatric hospitalization are provided

treatment at either a state-run inpatient facility, Vermont Psychiatric Care Hospital (VPHC) or one of five hospitals throughout the state.

In addition to CMS and national accreditation, each of the Designated Hospitals is reviewed and re-designated every two years against psychiatric care standards established and maintained by DMH. Designated Hospitals provide treatment to both voluntary and involuntary patients. The Vermont system recognizes three acuity levels for adults:

- Level 1 Involuntary— involuntary hospitalization stays paid at-cost to contracted and state providers for people who are the most acutely distressed who require additional clinical resources to support their treatment while hospitalized;
- Non-Level 1 Involuntary – involuntary hospitalization stays for individuals who do not require additional clinical resources to support their treatment while hospitalized; and
- Voluntary – Voluntary hospitalization stays for individuals who do not require additional clinical resources to support their treatment while hospitalized.

Level 1 Involuntary care is provided in three hospitals for a total of 45 beds. These beds require admission and concurrent review by the DMH utilization review care managers. Two of these facilities are classified as an IMD. The VPCH is the only facility dedicated to high acuity Level 1 designees and persons who cannot be admitted to other settings due to their overall patient mix and the patient's level of acuity at the time of admission.

At CMS's request, the State completed an in-depth study of these services for the period 2013-2016. That study was included in Interim Evaluation Report #1, issued April 1, 2018. Results concluded IMD services were of high quality, promoted successful transition to the community and played a vital role supporting the full continuum of community-based mental health and psychiatric care.

Vermont's amendment allows the State to maintain and enhance access to mental health services and continue delivery system improvements to provide coordinated and comprehensive treatment for Medicaid beneficiaries with a SMI. CMS goals for the SMI amendment include:

1. Reduced utilization and lengths of stay in Emergency Departments (EDs) among Medicaid beneficiaries with SMI or SED while awaiting mental health treatment in specialized settings;
2. Reduced preventable readmissions to acute care hospitals and residential settings;
3. Improved availability of crisis stabilization services including services made available through call centers and mobile crisis units, intensive outpatient services, as well as services provided during acute short-term stays in residential crisis stabilization programs and psychiatric hospitals and residential treatment settings throughout the state;
4. Improved access to community-based services to address the chronic mental health care needs of beneficiaries with SMI or Serious Emotional Disturbance (SED) including through increased integration of primary and behavioral health care; and
5. Improved care coordination, especially continuity of care in the community following episodes of acute care in hospitals and residential treatment facilities.

The State's current demonstration and approach are fully aligned to realize these goals, as illustrated in Exhibit 1-5 below.

Exhibit 1-5: SMI IMD Goals and Alignment

Global Commitment to Health Goals	SMI Amendment Goals
To increase access to care	Improved access to community-based services to address the chronic mental health care needs of beneficiaries with SMI or SED including through increased integration of primary and behavioral health care. (Goal #4)
	Improved availability of crisis stabilization services including services made available through call centers and mobile crisis units, intensive outpatient services, as well as services provided during acute short-term stays in residential crisis stabilization programs and psychiatric hospitals and residential treatment settings throughout the state. (Goal #3)
	Reduced utilization and lengths of stay in EDs among Medicaid beneficiaries with SMI or SED while awaiting mental health treatment in specialized settings. (Goal #1)
To improve the quality of care	Improved care coordination, especially continuity of care in the community following episodes of acute care in hospitals and residential treatment facilities. (Goal #5)
	Reduced preventable readmissions to acute care hospitals and residential settings. (Goal #2)
To contain health care costs	Reduced utilization and lengths of stay in EDs among Medicaid beneficiaries with SMI or SED while awaiting mental health treatment in specialized settings. (Goal #1)
	Reduced preventable readmissions to acute care hospitals and residential settings. (Goal #2)
To eliminate institutional bias	Improved access to community-based services to address the chronic mental health care needs of beneficiaries with SMI or SED including through increased integration of primary and behavioral health care. (Goal #4)

II. EVALUATION QUESTIONS, HYPOTHESES AND MEASURES

This evaluation will examine evidence that the demonstration supports its overarching goals: increased access to care; improved quality of care; cost containment; and stable in-home and community alternatives to institutional care. These overall demonstration goals extend to Vermont's service delivery model as described in the SUD amendment (effective July 1, 2018) and the amendment for adults with a SMI (effective January 1, 2020).

The plan utilizes both performance measurement results (providing more real-time data focused on whether a program is achieving measurable objectives) and more rigorous program evaluation findings that analyzes findings against national benchmarks, changes over time and attempts to isolate key variables influencing outcomes. Where appropriate measures will be examined for impact specific to SUD enrollees and other sub-groups.

To ensure that the new aspects of the demonstration and its SUD and SMI amendments are implemented as intended and achieve the related goals/objectives and desired outcomes, this evaluation plan includes strategic alignment with the State's Comprehensive Quality Strategy, SUD and SMI Monitoring Protocols.

A. Comprehensive Quality Strategy, Rapid Cycle Assessment, SUD and SMI Monitoring Protocols

Vermont has a Comprehensive Quality Strategy (CQS) that integrates all aspects of quality improvement programs, processes, and requirements across the State's Medicaid program. The CQS is intended to serve as a blueprint or road map for Vermont and its Medicaid managed care-like operations in assessing the quality of care that beneficiaries receive, as well as for setting forth measurable goals and targets for improvement.

As approved by CMS, the CQS is the vehicle for demonstrating Vermont's compliance with the new HCBS regulations (comparable to 'transition plans' in other states). The CQS meets all requirements of 42 CFR 438 and includes Long Term Services and Supports (LTSS) and HCBS quality components. Key elements addressed in the CQS include: goals; responsibilities; performance improvement projects; performance measures; populations; timelines; monitoring and evaluation; and performance improvement accountability.

The demonstration's evaluation will align with the goals, measures and monitoring activities outlined in the AHS CQS. AHS will regularly monitor the demonstration on the key outcome measures and performance targets and make changes as appropriate (obtaining CMS or legislative approval where needed). The CQS is reviewed and updated as needed, but no less than once every three years.

The State may also routinely evaluate policy changes and new initiatives to rapidly assess effectiveness, promote continuous improvement and to identify success and barriers without delay. The State will retain responsibility and discretion for conducting rapid cycle assessments for new payment and service delivery and/or payment reforms implemented or supported by the demonstration (e.g., Next Generation Medicaid ACO, Dental Incentives, Blueprint to Health) as well as any new Delivery System Reform Investments.

Documenting the development of new initiatives and their operational impact provides an understanding of the reasons for successful or unsuccessful performance, provides direction in shaping program modifications and improvement, and provides information about whether assessment findings can be generalized.

This rapid analysis will be based on grantee reporting, key informant information from the AHS, as well as community leaders, administrators, physician leaders, and others directly responsible for, or knowledgeable about, the new initiative or investment. As appropriate, fiscal analysis will be conducted to analyze expenditure information. Reports will be used to provide program staff with specific details for the month, quarter, or year, and/or provide direction in shaping modifications that may be required to support more effective investments.

This type of rapid cycle approach blurs some of the classic differentiation between formative and summative evaluation approaches. The selection of similar evaluation methods for different purposes will allow the State and providers to focus on adjusting the process aspects of an innovation – while at the same time improving the impact of the innovation overall. It is important to note that the rigor of the evaluation should not be sacrificed for the sake of speed. To do so, advanced statistical methods to measure effectiveness should be used, including the appropriate selection of comparison groups whenever possible.

The State has added a SUD Monitoring Protocol (SUD MP), SUD Mid-Point Assessment, SMI Monitoring Protocol and SMI Mid-Point Assessment to its quality improvement activities. The Monitoring Protocols for both populations include: monthly, quarterly and annual descriptive detail (e.g., number of enrollees and service delivered); annual outcome and quality metrics (e.g., HEDIS® measures); and milestone specific process measures (e.g., use of IT strategies to improve SUD and psychiatric treatment services).

The MPs for both amendments identify a baseline, a target to be achieved by the end of the demonstration and an annual goal for closing the gap between baseline and target expressed as percentage points. Key elements addressed in the SUD and SMI MPs will also be used in the design of this evaluation. In addition, the revised design will include a mid-point assessment of progress specific to the effectiveness of each demonstration amendment (SUD and SMI).

This alignment of performance oversight will create a feedback loop across quality activities, Mid-Point Assessments, quarterly assessment reports, rapid cycle projects and summative evaluation findings. The State's process of regularly measuring, monitoring, and making changes should result in continuous improvement in terms of achieving its performance targets and intended outcomes.

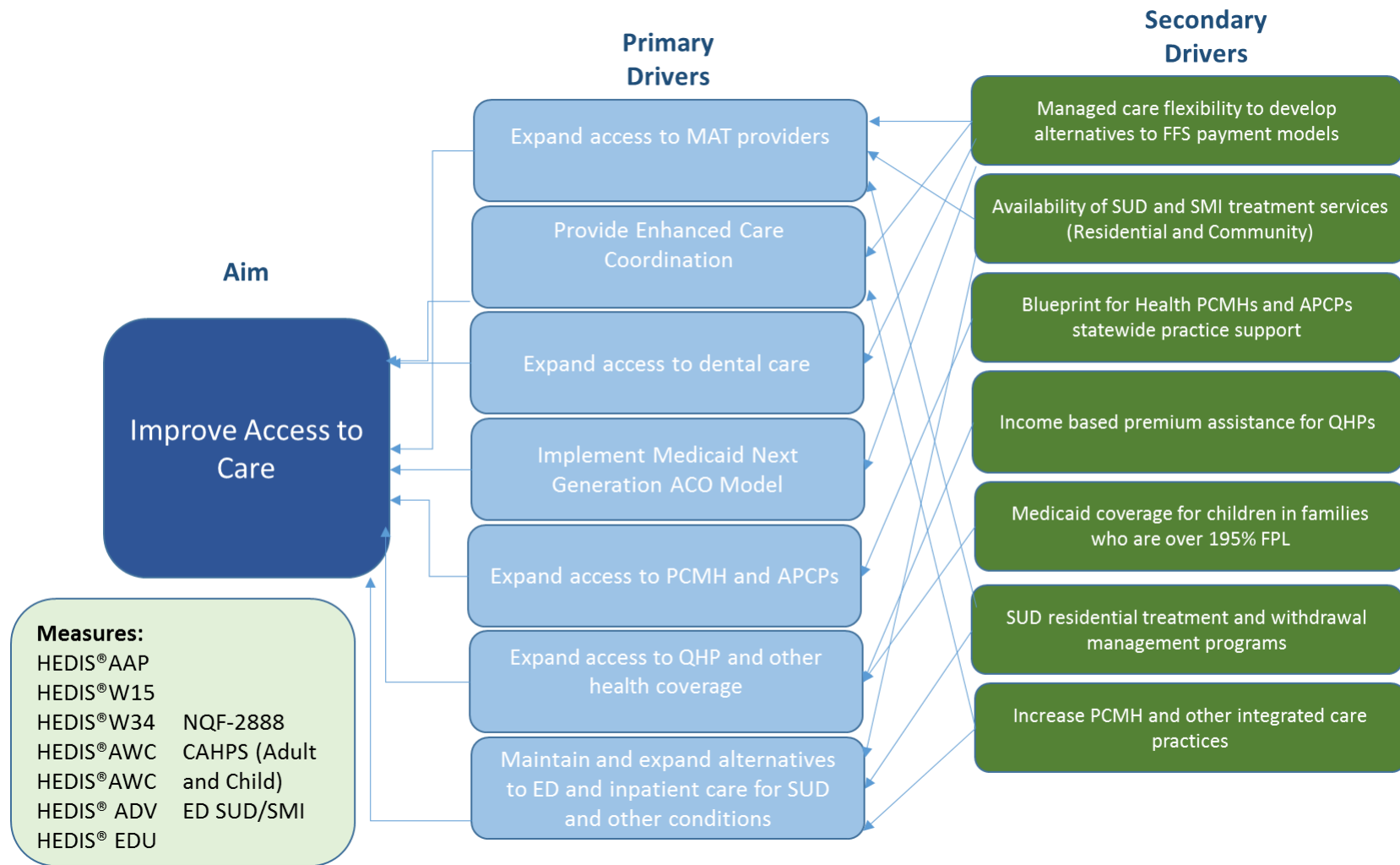
B. Demonstration Driver Diagrams and SMI IMD Amendment Logic Model

The Global Commitment to Health has been in operation for over 14 years. It offers a comprehensive statewide demonstration designed to use public health and managed care techniques for the design and delivery of behavioral and physical health services; and through its investments, address social determinants of health. The demonstration also equalizes the entitlement for long term care services in the home and community for Medicaid enrollees with developmental and other disabilities and elders.

Over the past 14 years the State has successfully improved access, supported quality and community integration and contained costs. Tools and techniques from managed care, such as alternatives to fee

for service and enhanced care coordination payment models (e.g., Blueprint for Health), value-based contracting (e.g., Vermont Medicaid Next Generation Model (VMNG) and ACO), and comprehensive quality monitoring. Public Health approaches include promoting health education and awareness, improving access to primary and preventative care (e.g., immunization clinics, expanded health coverage) and addressing social determinants of health. In achieving its outcomes, the demonstration offers multiple interrelated drivers of success. Driver diagrams in support of demonstration goals are provided in Figures 1-4.

Attachment K
 Figure 1: Access to Care Driver Diagram



Attachment K
 Figure 2: Quality of Care Driver Diagram

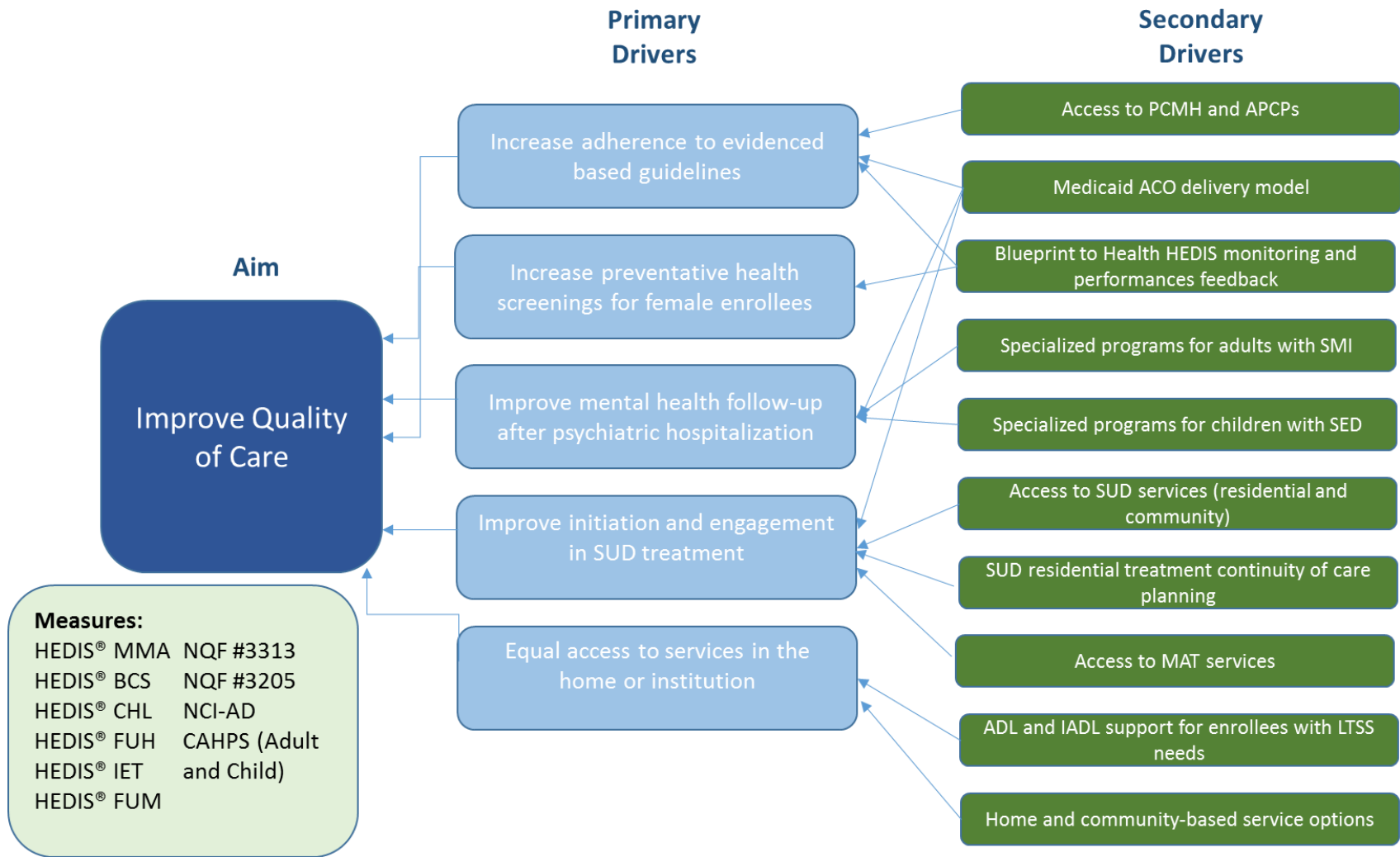


Figure 3: Community Integration Driver Diagram

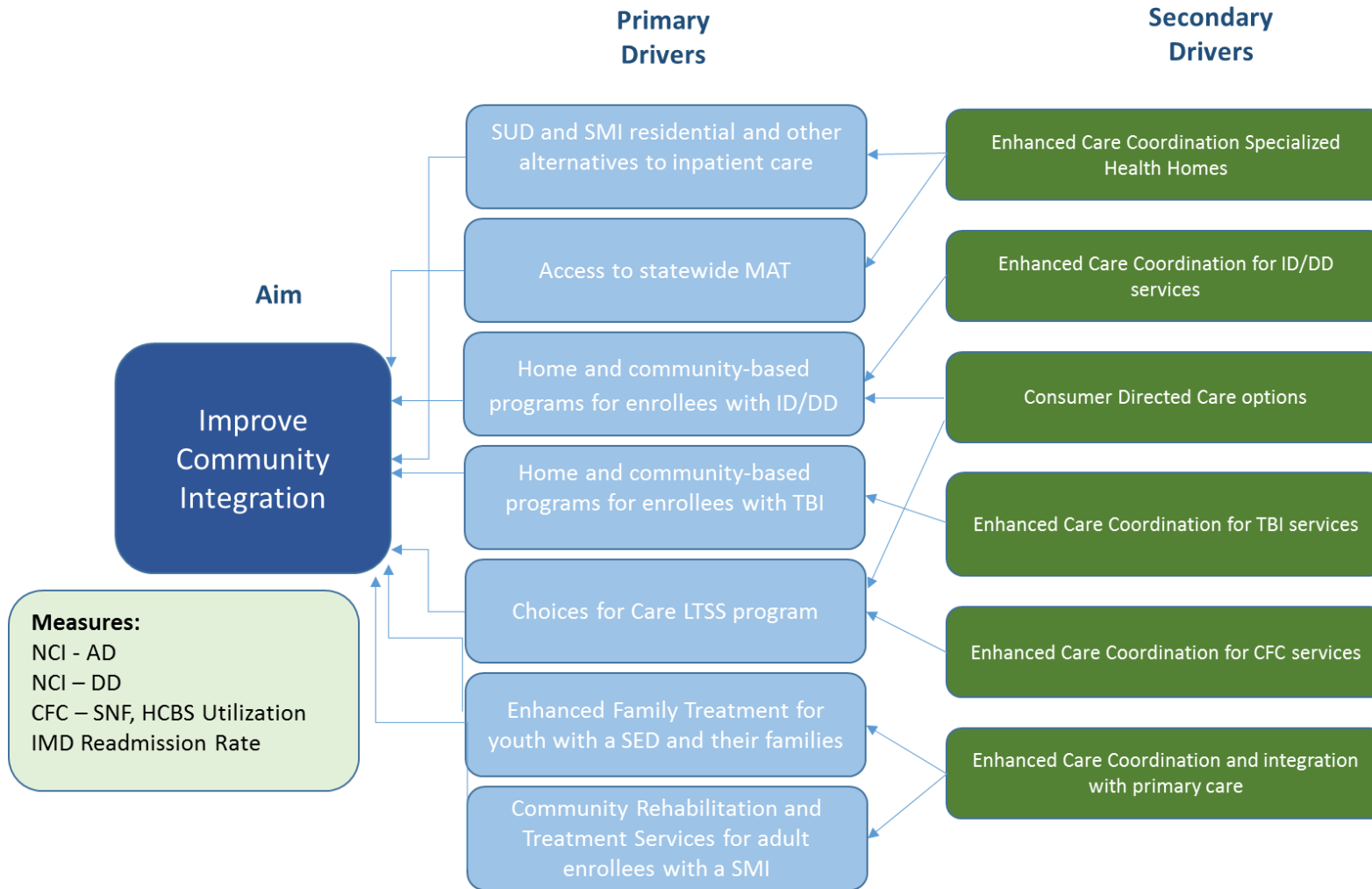
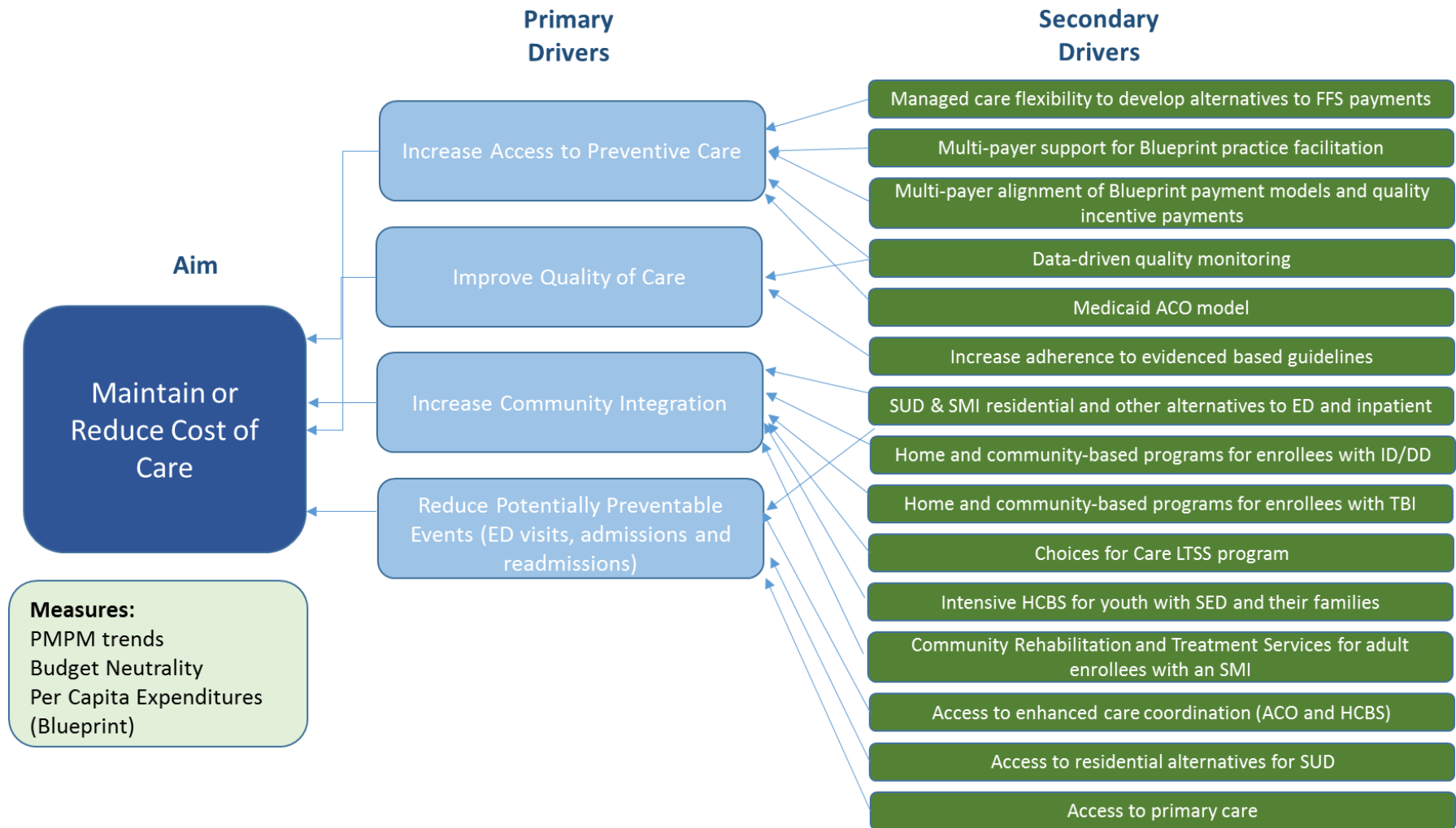


Figure 4: Maintain or Reduce Cost Driver Diagram



SMI IMD AMENDMENT LOGIC MODEL

As part of the SMI-IMD Amendment, the State also received CMS approval for its SMI Implementation Plan. The Implementation Plan outlines milestones established by CMS for all Section 1115 SMI IMD Demonstrations and how Vermont meets or will achieve those milestones. Vermont has had a decades long commitment to community based mental health and psychiatric care. This has resulted in a comprehensive continuum of care, including crisis stabilization and mobile crisis outreach services, as well as recognition that high quality inpatient psychiatric care is an essential element of the treatment continuum. Vermont's delivery system includes extensive investment in community based mental health services, including peer run alternatives and early detection and intervention for mental health challenges.

Due to the comprehensiveness of the Global Commitment to Health demonstration (e.g., encompassing the full Medicaid program) and Vermont's existing mental health delivery system, the current evaluation design already includes metrics related to mental health services and related hypotheses. Exhibit 2-1 below, offers an overview of Vermont's evaluation elements, specific to mental health and psychiatric care, already included in the approved evaluation design. Full detail relative to research questions, data sources and analytics for these hypotheses/measures can be found in the Exhibit 2-3 through 2-6 in Subsection C.

Exhibit 2-1: Existing Design Elements for Mental Health and Psychiatric Care (pre-SMI IMD Amendment)

Goal Area	Hypotheses	Measure	Population
Access to Care	Hypothesis 4: The demonstration will reduce the percent of potentially preventable events (PPEs)	Rate of ED visits per 1,000-member months for Children's Mental Health program enrollees	Children's Mental Health program enrollees
	Hypothesis 8: The Medicaid ACO will improve access to mental health and substance use disorder treatment	Percent of enrollees who received follow-up after discharge from ED for mental health (30-days)	Medicaid ACO enrollees
		Percent of enrollees discharged who had follow-up at after hospitalization for mental illness (7 and 30-days)	
Quality of Care	Hypothesis 1: The demonstration will improve quality of care	Percent of enrollees screened for clinical depression and who have a follow-up plan	
	Hypothesis 4: The demonstration will improve mental health follow-up after psychiatric hospitalization	Percent of enrollees discharged who had follow-up after hospitalization for mental illness (7 and 30-days)	All Medicaid enrollees
Community Integration	Hypothesis 5: The demonstration will increase integrated employment options for persons with psychiatric needs	CRT Program Enrollees who are employed	CRT program enrollees

At the outset of the SMI-IMD demonstration Amendment, Vermont's Implementation Plan indicates that the majority of CMS Milestones and requirements have been met, with the exception of Milestone #2c. Milestone #2 relates to "Improving Care Coordination and Transition to Community-Based Care." Milestone #2c requires states to ensure IMD facilities contact members and their community-based Providers, through the most effective means possible, e.g., email, text or phone, within 72-hours of discharge. While extensive discharge planning is an element in Vermont's system, a 72-hour post-discharge contact is not currently a state requirement.

The State has identified several areas for enhancement in its Health Information Technology (HIT) Plan related to behavioral health services. These enhancements include IT support for:

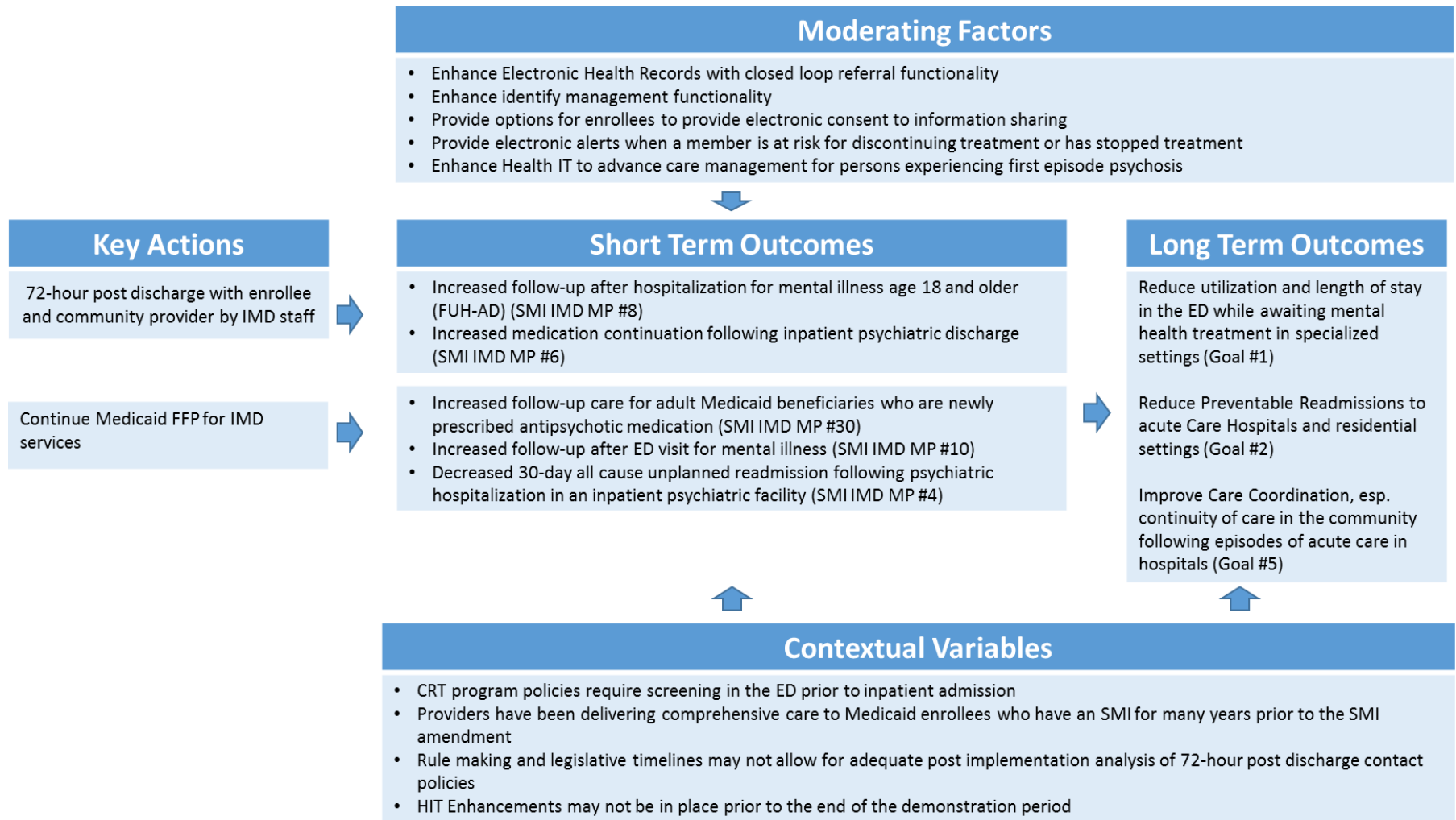
- Closed loop referrals (e.g., between physicians and BH providers; institutions to providers; and providers to community service supports);
- Electronic transmission of records between providers and during transitions of care;
- Electronic consent;
- Alerting analytics; and
- Identity management.

The State has committed to planning for these enhancements in the next 12-18 months.

Implementation of each element will occur within the context and timeline of the State's HIT Roadmap as new IT components come online across the system of care.

Figure 5 offers a logic model for the SMI IMD enhancements outlined in Vermont's CMS approved SMI Implementation Plan.

Figure 5: SMI Logic Model and Goals: Milestone #2



To assess the impact of enhancing post discharge contact requirements and evaluate Vermont's continued investment in mental health and psychiatric care, the evaluation will examine additional measures outlined in Exhibit 2-2 below and detailed in Exhibits 2.3 through 2.6 in Subsection C.

Exhibit 2-2. Additional and Revised SMI-Specific Hypotheses and Metrics

Goal Area	Hypotheses	Measure	Population
Access to Care	Hypothesis 4: The demonstration will reduce the percent of potentially preventable events (PPEs)	Rate of ED visits for MH per 1,000 member months for SMI enrollees (adapted from SMI MP #16)	SMI-IMD Study Group
Quality of Care	Hypothesis 1: The demonstration will improve quality of care	Follow-up care for adult Medicaid beneficiaries who are newly prescribed an antipsychotic medication (SMI MP #30) Follow-up after ED visit for mental illness (SMI MP #10)	SMI-IMD Study Group
	Hypothesis 4: The demonstration will improve mental health follow-up after psychiatric hospitalization	Percent of enrollees discharged who had follow-up after hospitalization for mental illness (at 7 and 30 days) (SMI MP #8) Medication continuation following inpatient psychiatric discharge (SMI MP #6)	SMI-IMD Study Group
Community integration	Hypothesis 6: IMD service recipients will maintain community living as evidenced by low rates of inpatient readmission	The rate of 30-day all-cause unplanned readmissions following psychiatric hospitalization in an inpatient facility (SMI MP #4)	SMI-IMD Study Group
Cost	Hypothesis 1: the demonstration will maintain or reduce spending in comparison to what would have been spent absent the demonstration	The SMI IMD PMPM trend rates and per capita cost estimates for each eligibility group defined in STC 67 for each year of the demonstration	SMI-IMD Study Group
	Exploratory (not associated with a hypothesis)	Total cost associated with MH services (non-inpatient), with breakouts for federal and state expenditures (SMI MP #32)	SMI-IMD Study Group
		Total costs associated with MH inpatient services, with breakouts for IMD (SMI MP #33)	SMI-IMD Study Group
		Total annual cost of care with breakouts for outpatient (non-ED), pharmacy, outpatient-ED, inpatient physical health and IMD services	SMI-IMD Study Group

C. Hypothesis

The State has identified the following overarching research questions for the demonstration.

1. Will the demonstration result in improved access to care?
2. Will value-based payment models increase access to care?
3. Will the demonstration result in improved quality of care?
4. Will improved access to primary care result in improved health outcomes?
5. Will the demonstration result in increased community integration?
6. Will the demonstration maintain or reduce spending in comparison to what would have been spent absent the demonstration?
7. Will improved access to preventive care result in lower overall costs for the healthcare delivery system?

An overview of each goal, primary drivers, hypothesis, and measures is outlined in Exhibit 2-3 through 2-6, on the following pages and further defined in Section III.

Exhibit 2-3 – 2-6 notes:

Where standardized measures for HEDIS®, National Quality Forum (NQF), Consumer Assessment of Healthcare Providers and Systems (CAHPS) Survey, and the National Core Indicators Project (NCI-AD, NCI-DD) Survey are used, the numerator and denominator will align with standard specifications for Medicaid populations unless otherwise noted. Baseline Periods are indicated as Calendar Year (CY) or State Fiscal Year (SFY) in each Exhibit.

Where measures are generated based on specifications in the SUD or SMI Monitoring Protocol (MP), the CMS Technical Specification Manual metric number is included, along with the NQF or HEDIS® reference, as applicable. The evaluation will rely on the most recent technical manual version published by CMS at the time of production and Vermont’s final approved SMI Monitoring Protocol.

Cost measures associated with the SUD and SMI demonstration amendments will be explored using specifications outlined in the final approved SMI Monitoring Protocol and CMS guidance for SMI/SUD Evaluation Design (Appendix C) issued in March of 2019 and [Found Here](#).

The use of analytic methods used in the following Exhibits are described below (see Section III-C for additional detail):

- Logistic Regression: Year over year change will be measured with the Logistic Regression – across all years, comparing differences in the means (i.e. the rates of a certain health outcome measure) between a baseline year and each year of the demonstration for measures where indicated;
- Propensity Score Matching with T-test: Where indicated, this analytic method will be used to control for potential variances in demographic and delivery system characteristics between samples;
- Descriptive Statistics: For all measures statistics such as frequency, average, percent change, and comparison to national results, where applicable, will be employed. When descriptive statistics are the primary method of analysis, the metrics are exploratory or qualitative in nature or rely on composite score data, combined and weighted over several survey questions. Deconstruction of the specific survey data is not practical given state resources and proprietary nature of some survey contracts.

Demonstration Goal: Improve Access to Care								
Primary Driver	Measure	State Steward	Target Population	Numerator	Denominator	Data Source	Baseline Year	Analytic Approach
Research Question 1: Will the demonstration result in improved access to care?								
Hypothesis 1: The demonstration will result in improved access to community based medical care								
Expand Access to PCMH and ACPs	Percent of adult enrollees who had an ambulatory or preventive care visit	DVHA	Medicaid Enrollees	HEDIS® AAP (Total Score)		MMIS	CY2016	Logistic Regression; Descriptive Statistics
	Percent of enrollees with Well-child visits first 15 months of life, 6 or more visits	DVHA	Medicaid Enrollees	HEDIS® W15		MMIS	CY2016	
	Percent of enrollees with Well-child visits 3rd, 4th, 5th, & 6th year of life	DVHA	Medicaid Enrollees	HEDIS® W34		MMIS	CY2016	
	Percent of adolescents ages 12 to 21 who receive one or more well-care visits with a PCP during the year	DVHA	Medicaid Enrollees	HEDIS® AWC		MMIS	CY2016	
	Percent of respondents indicating they received necessary care	DVHA	Medicaid Enrollees (Child Survey)	CAHPS-CPC Representative Sample		CAHPS Survey	CY2016	Descriptive Statistics
			Medicaid Enrollees (Adult Survey)	CAHPS-CPA Representative Sample			CY2017	
	Percent of respondents who rate their ability to get desired appointment or information as always	Blueprint	Blueprint Program Enrollees	CAHPS-PCMH Representative Sample		CAHPS Survey	CY2016	
	Percent of respondents who rate how well their physician explains things, listens to their concerns, shows respect and spends enough time with them as always	Blueprint	Blueprint Program Enrollees	CAHPS-PCMH Representative Sample		CAHPS Survey	CY2016	
	Percent of respondents who rate how well their physician explains things, listens to their concerns, shows respect and spends enough time with them as usually or always	DVHA	Medicaid Enrollees (Child Survey)	CAHPS-CPC Representative Sample		CAHPS Survey	CY2016	
			Medicaid Enrollees (Adult Survey)	CAHPS-CPA Representative Sample			CY2017	

Demonstration Goal: Improve Access to Care

Primary Driver	Measure	State Steward	Target Population	Numerator	Denominator	Data Source	Baseline Year	Analytic Approach
Hypothesis 2: The demonstration will result in improved access to Medication Assisted Treatment (MAT) for OUD								
Expand Access to MAT	Number of people receiving MAT per 10,000 Vermonters age 18-64	VDH	Vermont Residents	The number of hub and spoke recipients in a month	Number of Vermonters aged 18-64 divided by 10,000	MMIS; VPMS;	CY2016	Logistic Regression; Descriptive Statistics
	Percent of enrollees with continuity of pharmacotherapy for Opioid Use Disorder	DVHA	Medicaid Enrollees	SUD MP #22 (NQF #3175)		MMIS	CY2018	Logistic Regression; Descriptive Statistics
	Number of Vermont resident deaths related to drug overdose	VDH	Vermont Residents	N/A	N/A	Vital Statistics	CY2016	Descriptive Statistics
	Number of Vermont Medicaid enrollee deaths related to drug overdose	DVHA	Medicaid Enrollees	N/A	N/A	Vital Statistics; MMIS	CY2018	
Hypothesis 3: The demonstration will result in improved access to dental care								
Expand Access to Dental Care	Percent of children age 2-20 years with at least one dental visit	DVHA	Medicaid Enrollees	HEDIS® ADV (Total Score)		MMIS	CY2016	Logistic Regression; Descriptive Statistics
Hypothesis 4: The demonstration will reduce the percent of potentially preventable events (PPEs)								
Provide Enhanced Care Coordination	Percent of Potentially Avoidable ED Utilization	DVHA	Medicaid Enrollees	Potentially avoidable ED visits	Total number of ED visits	MMIS	CY2016	Logistic Regression; Descriptive Statistics
	Percent of all cause unplanned admissions for patients with multiple chronic conditions	DVHA	Medicaid ACO Enrollees	NQF-2888		MMIS	CY2017	
	Rate of ED visits per 1,000-member months	DVHA	Medicaid Enrollees	HEDIS® AMB-ED (All Age Groups)		MMIS	CY2016	
	Rate of ED visits per 1,000-member months for CFC enrollees	DVHA	CFC Program Enrollees	Number of CFC Program Enrollee visits to ED	CFC program enrollee member months divided by 1,000	MMIS	CY2016	
	Rate of ED visits per 1,000-member months for DDS enrollees	DVHA	DDS Program Enrollees	Number of DDS Program Enrollee visits to ED	DDS program enrollee member months divided by 1,000	MMIS	CY2016	
	Rate of ED visits per 1,000-member months for TBI program enrollees	DVHA	TBI Program Enrollees	Number of TBI Program Enrollee visits to ED	TBI program enrollee member months divided by 1,000	MMIS	CY2016	
	Rate of ED visits per 1,000-member months for SED program enrollees	DVHA	Children's Mental Health Program Enrollees	Number of Children's MH Program	Children's Mental Health program enrollee member	MMIS	CY2016	

Demonstration Goal: Improve Access to Care

Primary Driver	Measure	State Steward	Target Population	Numerator	Denominator	Data Source	Baseline Year	Analytic Approach	
Maintain and expand alternatives to ED	Rate of ED visits for mental health per 1,000 member months for enrollees with an SMI	DVHA	SMI Study Group	Enrollee visits to ED Total number of ED visit meeting specifications for SMI MP #16	months divided by 1,000 SMI MP #16 The total number of member months divided by 1,000	MMIS	CY2019	Logistic Regression; Descriptive Statistics	
	Hypothesis 5: The demonstration will reduce ED use for SUD per 1,000 enrollees								
	Rate of ED use for SUD per 1,000 enrollees	DVHA	Medicaid Enrollees	Enrollees meeting specifications for SUD MP #23		MMIS	CY2018	Logistic Regression; Descriptive Statistics	
	Hypothesis 6: Premium requirements for eligible families above 195% FPL will not impede access to enrollment								
	Percent of children found eligible for Dr. Dynasaur with premium whose families paid the premium necessary to effectuate coverage	DVHA	Medicaid Enrollees	Number of children whose families paid the premium necessary to effectuate coverage	Number of children found eligible for Dr. Dynasaur premium plans	Medicaid Eligibility Files	CY2016	Logistic Regression; Descriptive Statistics	
Expand Access to CHIP and Other Health Coverage	Hypothesis 7: The VPA Qualified Health Plans subsidy program will result in continued access to health care coverage								
	Percent of members with VPA who had coverage from the month they signed up through the end of the year, without any gaps in coverage or VPA	DVHA	VPA Program Enrollees	Number of individuals with no gap in coverage from the month VPA was applied through December of the measurement year	Number of individuals who had VPA applied for any month of measurement year	VPA Eligibility Files	CY2016	Logistic Regression; Descriptive Statistics	
	Percent of uninsured Vermonters	VDH	Vermont Residents	Representative Sample of Vermonters for the Household Health Insurance Survey (assessed every 3 years)		VDH Survey	CY2014	Descriptive Data	
Research Question 2: Will value based payment models increase access to care?									
Implement Medicaid Next Generation ACO Model	Hypothesis 1: The Medicaid ACO will improve access to mental health and substance use disorder treatment								
	Percent of enrollees who received 30-day follow-up after discharge from ED for mental health	DVHA	Medicaid ACO Enrollees	HEDIS® FUM		MMIS	CY2017	Propensity Score Matching with T-test; Descriptive Statistics	
	Percent of enrollees who received 30-day follow-up after discharge	DVHA	Medicaid ACO Enrollees	HEDIS® FUA		MMIS	CY2017		

Demonstration Goal: Improve Access to Care

Primary Driver	Measure	State Steward	Target Population	Numerator	Denominator	Data Source	Baseline Year	Analytic Approach	
	from ED for alcohol or other drug dependence								
	Percent of enrollees discharged who had follow-up at 30 days after hospitalization for mental illness	DVHA	Medicaid ACO Enrollees	HEDIS® FUH		MMIS	CY2017		
	Hypothesis 2: The Medicaid ACO will improve access to adolescent well-care								
	Percent of adolescents ages 12 to 21 who receive one or more well-care visits with PCP	DVHA	Medicaid ACO Enrollees	HEDIS® AWC		MMIS	CY2017	Propensity Score Matching with T-test; Descriptive Statistics	
	Hypothesis 3: The Medicaid ACO will increase engagement with eligible enrollees								
	Percent Total Medicaid Enrollees aligned with ACO	DVHA	Medicaid Enrollees	Number of enrollees aligned with the ACO	Number of enrollees	Enrollment Files (PCP Selection); and MMIS	CY2017	Logistic Regression; Descriptive Statistics	
	Percent ACO Eligible Enrollees aligned with ACO	DVHA	Medicaid ACO Enrollees	Number of eligible enrollees aligned with the ACO	Number of enrollees eligible to receive ACO services	Enrollment Files (PCP Selection); and MMIS	CY2017		

Demonstration Goal: Improve Quality of Care									
Primary Driver	Measure	State Steward	Target Population	Numerator	Denominator	Data Source	Baseline Year	Analytic Approach	
Research Question 3: Will the demonstration result in improved quality of care?									
Increased Adherence to Evidenced Based Guidelines	Hypothesis 1: The demonstration will improve quality of care								
	Percent of enrollees receiving appropriate asthma medication management 50% Compliance	DVHA	Medicaid Enrollees	HEDIS® MMA (Total Score)		MMIS	CY2016	Logistic Regression; Descriptive Statistics	
	Percent of enrollees receiving appropriate asthma medication management 75% Compliance	DVHA	Medicaid Enrollees	HEDIS® MMA (Total Score)		MMIS	CY2016		
	Percent of enrollees screened for clinical depression and who have a follow-up plan	DVHA	Medicaid ACO Enrollees	HEDIS® DSF		MMIS; ACO Records	CY2017		
	Percent of enrollees who received Developmental Screening in the first 3 years of life	DVHA	Medicaid ACO Enrollees	NQF-1448		MMIS	CY2017		
	Percent of adult enrollees who are newly prescribed antipsychotic medication and received follow-up care within 28 days	DVHA	SMI Study Group	The number of new antipsychotic medication prescriptions with a qualifying outpatient visits within 28 days (4 weeks) of the prescription fill date as per SMI MP #30 (NQF# 3313)	Total new antipsychotic prescriptions between January 1 and November 30 of the measurement year as per SMI MP#30 (NQF#3313)		MMIS	CY2019	Logistic Regression; Descriptive Statistics
	Percent of adult enrollees who receive follow-up within 7-days after ED visit for mental illness	DVHA	SMI Study Group	Follow-up visit within 7-days after the ED visit as per SMI MP #10 (HEDIS® FUM-AD)	ED visits with a principal diagnosis of mental illness or intentional self-harm between January 1 and December 1 of the measurement year as per SMI MP #10 (HEDIS® FUM-AD)		MMIS	CY2019	Logistic Regression; Descriptive Statistics
	Percent of adult enrollees who receive follow-up within 30-days after ED visit for mental illness	DVHA	SMI Study Group	Follow-up visit within 30-days after the ED visit as per SMI MP #10 (HEDIS® FUM-AD)	ED visits with a principal diagnosis of mental illness or intentional self-harm between January 1 and December 1 of the measurement year as per SMI MP #10 (HEDIS® FUM-AD)		MMIS	CY2019	Logistic Regression; Descriptive Statistics
	Hypothesis 2: ACO enrollees will show improved diabetes and hypertension control								
	Percent of patients 18-75 years of age with diabetes (type 1 and type 2) whose most recent HbA1c level during the measurement year was greater than 9.0% (poor control) or was missing a result, or if an HbA1c	DVHA	Medicaid ACO Enrollees	NQF-0059		MMIS; ACO Medical Records	CY2017	Descriptive Statistics	

Demonstration Goal: Improve Quality of Care

Primary Driver	Measure	State Steward	Target Population	Numerator	Denominator	Data Source	Baseline Year	Analytic Approach
Increase Preventive Health Screenings for Female Enrollees	test was not done during the measurement year							
	Percent of adults 18–85 years of age with a diagnosis of hypertension and whose blood pressure was adequately controlled	DVHA	Medicaid ACO Enrollees		HEDIS® CBP	MMIS; ACO Medical Records	CY2017	
	Hypothesis 3: The demonstration will increase preventive health screenings for female enrollees							
	Percent of female enrollees age 50 to 74 who receive breast cancer screening appropriate intervals	DVHA	Medicaid Enrollees		HEDIS® BCS	MMIS	CY2016	Logistic Regression; Descriptive Statistics
	Percent of female enrollees screened for Chlamydia	DVHA	Medicaid Enrollees		HEDIS® CHL (Total Score)	MMIS	CY2016	
	Hypothesis 4: The demonstration will improve mental health follow-up after psychiatric hospitalization							
	Percent of enrollees discharged who had follow-up at 7 days after hospitalization for mental illness	DVHA	Medicaid Enrollees		HEDIS® FUH ²	MMIS	CY2016	Logistic Regression; Descriptive Statistics
	Percent of enrollees discharged who had follow-up at 30 days after hospitalization for mental illness	DVHA	Medicaid Enrollees		HEDIS® FUH ³	MMIS	CY2016	
Improve Mental Health Follow-up after psychiatric hospitalization	Percent of enrollees discharged who had follow-up at 7 days after hospitalization for mental illness	DVHA	SMI Study Group	A follow-up MH visit within 7-days after discharge as per SMI MP #8 (HEDIS® FUH-AD)	Members discharged from IMD as per SMI MP #8 (HEDIS® FUH-AD)	MMIS; VPCH	CY2019	Logistic Regression; Descriptive Statistics
	Percent of enrollees discharged who had follow-up at 30 days after hospitalization for mental illness	DVHA	SMI Study Group	A follow-up MH visit within 30-days after discharge as per SMI MP #8 (HEDIS® FUH-AD)	Members discharged from IMD as per SMI MP #8 (HEDIS® FUH-AD)	MMIS; VPCH	CY2019	Logistic Regression; Descriptive Statistics
	Medication continuation following inpatient psychiatric discharge	DVHA	SMI Study Group	Discharges with an evidence-based medication dispensed within 2 days prior to discharge through 30 days post-discharge as per SMI MP #6 (NQF #3205)	Discharges from IMD with a principal diagnosis of major depressive disorder, schizophrenia, or bipolar disorder per SMI MP #6 (NQF #3205)	MMIS; VPCH	CY2019	Logistic Regression; Descriptive Statistics

² Vermont's measure is aligned with HEDIS FUH, however, it has been modified to include codes for follow-up received through Designated and Specialized Agencies for individuals with mental health needs, including integrated primary care

³ Ibid

Demonstration Goal: Improve Quality of Care

Primary Driver	Measure	State Steward	Target Population	Numerator	Denominator	Data Source	Baseline Year	Analytic Approach
Improve Initiation and Engagement in SUD treatment	Hypothesis 5: The demonstration will improve Initiation and engagement in SUD treatment							
	Percent of enrollees using substances who initiate in treatment	DVHA	Medicaid Enrollees	HEDIS® IET ⁴ (Total Score)		MMIS	CY2016	Logistic Regression; Descriptive Statistics
	Percent of enrollees using substances who engage in treatment	DVHA	Medicaid Enrollees	HEDIS® IET ⁵ (Total Score)		MMIS	CY2016	
	Percent of enrollees using substances who initiate in treatment	DVHA	SUD IMD Service Recipients	HEDIS® IET (Total Score) ⁶		MMIS	CY2018	
	Percent of enrollees using substances who engage in treatment	DVHA	SUD IMD Service Recipients	HEDIS® IET (Total Score) ⁷		MMIS	CY2018	
	Percent of enrollees using substances who initiate in treatment	DVHA	Medicaid ACO Enrollees	HEDIS® IET (Total Score)		MMIS	CY2017	
	Percent of enrollees using substances who engage in treatment	DVHA	Medicaid ACO Enrollees	HEDIS® IET (Total Score)		MMIS	CY2017	
Hypothesis 6: The demonstration will improve enrollee experience of care and rating of the health plan.								
Maintain equal access to services in the home or institution	Percent of respondents who rate the health plan as a 7, 8, 9 or 10 on a scale of 0-10 where 0 is the worst and 10 is the best	DVHA	Medicaid (Child Survey)	CAHPS-CPC Representative Sample		CAHPS Survey	CY2016	Descriptive Statistics
			Medicaid (Adult Survey)	CAHPS-CPA Representative Sample			CY2017	
	Percent of respondents who rate their ability to get care quickly as usually or always	DVHA	Medicaid (Child Survey)	CAHPS-CPC Representative Sample		CAHPS Survey	CY2016	
			Medicaid (Adult Survey)	CAHPS-CPA Representative Sample			CY2017	
	Percent of respondents who rate the care they received as a 7, 8, 9 or 10 on a scale of 0-10 where 0 is the worst and 10 is the best	DVHA	Medicaid (Child Survey)	CAHPS-CPC Representative Sample		CAHPS Survey	CY2016	
			Medicaid (Adult Survey)	CAHPS-CPA Representative Sample			CY2017	
	Percent of respondents who rate customer service as a 7, 8, 9 or 10 on a scale of 0-10 where 0 is the worst and 10 is the best	DVHA	Medicaid (Child Survey)	CAHPS-CPC Representative Sample		CAHPS Survey	CY2016	
			Medicaid (Adult Survey)	CAHPS-CPA Representative Sample			CY2017	

⁴ Vermont's IET measure is aligned with NCQA NQF measure 0004 (HEDIS IET), however, it has been modified to incorporate billing practices unique to Vermont's Specialized Health Home model and includes enrollees whose treatment was received through a specialized health home provider

⁵ Ibid

⁶ Ibid

⁷ Ibid

Demonstration Goal: Improve Quality of Care

Primary Driver	Measure	State Steward	Target Population	Numerator	Denominator	Data Source	Baseline Year	Analytic Approach	
Primary Driver	Proportion of participants needing assistance who always get enough assistance with everyday activities when needed	DAIL	CFC Program Enrollees	NCI-AD for Representative Sample of CFC program enrollees		NCI-AD Survey	CY2018	Descriptive Statistics	
	Proportion of participants needing assistance who always get enough assistance with everyday activities when needed	DAIL	TBI Program Enrollees	NCI-AD for Representative Sample of TBI program enrollees		NCI-AD Survey	CY2018		
	Hypothesis 7: The demonstration will improve enrollee self-report of health status for enrollees with LTSS needs								
	The proportion of people who describe their overall health as poor	DAIL	CFC Program Enrollees	NCI-AD for Representative Sample of CFC program enrollees		NCI-AD Survey	CY2018		
	The proportion of people who describe their overall health as poor	DAIL	TBI Program Enrollees	NCI-AD for Representative Sample of TBI program enrollees		NCI-AD Survey	CY2018		
	The proportion of people who were reported to be in poor health	DAIL	DDS Program Enrollees	NCI-AD for Representative Sample of DDS program enrollees		NCI-DD Survey	CY2016		
Research Question 4: Will improved access to primary care result in improved health outcomes?									
Expand Access to PCMH and APCPs	Hypothesis 1: The Blueprint for Health will improve diabetes control for members age 18-75.								
	Number of continuously enrolled Medicaid members, ages 18-75 whose Diabetes HbA1c was in control compared to those with poor control (HbA1c <9%) ⁸	Blueprint	Blueprint Medicaid Enrollees	N/A	N/A	VCHURES; Medical Records	CY2016	Descriptive Statistics	
	Inpatient hospitalizations per 1,000 members for continuously enrolled Medicaid members, ages 18-75 whose Diabetes HbA1c was in control compared to those with poor control ⁹	Blueprint	Blueprint Medicaid Enrollees	N/A	N/A	VCHURES; Medical Records	CY2016		

⁸ Blueprint enrolled Medicaid members with diabetes who have one or more inpatient visits, one or more outpatient emergency department visits, or two or more non-hospital outpatient visits with ICD-9 diagnosis codes of 250, 357.2, 362.0, 366.41, and 648.0 or ICD-10 diagnosis codes of E10, E11, E13, and O24 or who were dispensed insulin oral hypoglycemics/antihyperglycemics during the measurement year or the year prior to the measurement year. Additionally, members must be linked to the Blueprint Clinical Registry database and have at least one valid HbA1c measurement.

⁹ *ibid*

Demonstration Goal: Improve Community Integration

Primary Driver	Measure	State Steward	Target Population	Numerator	Denominator	Data Source	Baseline Year	Analytic Approach	
Research Question 5: Will the demonstration result in increased community integration?									
Hypothesis 1: The demonstration will increase community living for Choices for Care enrollees									
Home and Community Based Programs (TBI, DDS and CFC)	Average number of CFC enrollees served per month in a nursing facility	DAIL	CFC Program Enrollees	Number of CFC enrollees living in a nursing facility per month	Number of CFC enrollees, excluding the Moderate Needs Group	MMIS	CY2016	Logistic Regression; Descriptive Statistics	
	Average number of CFC enrollees served per month in a home setting	DAIL	CFC Program Enrollees	Number of CFC enrollees living in a home setting per month	Number of CFC enrollees, excluding the Moderate Needs Group	MMIS	CY2016		
	Average number of CFC enrollees served per month in a licensed residential facility	DAIL	CFC Program Enrollees	Number of CFC enrollees living in a licensed residential facility per each month	Number of CFC enrollees, excluding the Moderate Needs Group	MMIS	CY2016		
	Hypothesis 2: The demonstration will increase community integration for persons needing LTSS								
	Proportion of people who do things they enjoy outside of their home when and with whom they want to	DAIL	CFC Program Enrollees	NCI-AD for Representative Sample of CFC program enrollees		NCI-AD Survey	CY2018	Descriptive Statistics	
	Proportion of people who do things they enjoy outside of their home when and with whom they want to	DAIL	TBI Program Enrollees	NCI-AD for Representative Sample of TBI program enrollees		NCI-AD Survey	CY2018		
	Proportion of people who regularly participate in integrated activities in their communities	DAIL	DDS Program Enrollees	NCI-DD for Representative Sample of DDS program enrollees		NCI-DD Survey	CY2016		
	Hypothesis 3: The demonstration will increase choice and autonomy for persons needing LTSS								
	Proportion of people who can choose or change what kind of services they get and determine how often and when they get them	DAIL	CFC Program Enrollees	NCI-AD for Representative Sample of CFC program enrollees		NCI-AD	CY2018	Descriptive Statistics	
	Proportion of people who can choose or change what kind of services they get and determine how often and when they get them	DAIL	TBI Program Enrollees	NCI-AD for Representative Sample of TBI program enrollees		NCI-AD	CY2018		
The proportion of people who make choices about their everyday lives	DAIL	DDS Program Enrollees	NCI-DD for Representative Sample of DDS program enrollees		NCI-DD	CY2016			

Demonstration Goal: Improve Community Integration

Primary Driver	Measure	State Steward	Target Population	Numerator	Denominator	Data Source	Baseline Year	Analytic Approach
Hypothesis 4: The demonstration will increase integrated employment options for persons needing LTSS.								
Primary Driver	Proportion of people who have a paying job in the community, either full-time or part-time	DAIL	CFC Program Enrollees	NCI-AD for Representative Sample of CFC program enrollees		NCI-AD	CY2018	Descriptive Statistics
	Proportion of people who have a paying job in the community, either full-time or part-time	DAIL	TBI Program Enrollees	NCI-AD for Representative Sample of TBI program enrollees		NCI-AD	CY2018	
	Proportion of people who would like a job (if not currently employed)	DAIL	CFC Program Enrollees	NCI-AD for Representative Sample of CFC program enrollees		NCI-AD	CY2018	
	Proportion of people who would like a job (if not currently employed)	DAIL	TBI Program Enrollees	NCI-AD for Representative Sample of TBI program enrollees		NCI-AD	CY2018	
	The proportion of people who do not have a job in the community but would like to have one	DAIL	DDS Program Enrollees	NCI-DD for Representative Sample of DDS program enrollees		NCI-DD	CY2016	
	Employment rate of people of working age receiving DDS services	DAIL	DDS Program Enrollees	DDS Program Enrollees who are employed	DDS Program Enrollees who are eligible for employment	VT DOL; DVR	SFY2016	Logistic Regression; Descriptive Statistics
	Employment rate of people of working age receiving TBI rehabilitation services	DAIL	TBI Program Enrollees	TBI Program Enrollees who are employed	TBI Program Enrollees who are eligible for employment	VT DOL; DVR	SFY2016	
Hypothesis 5: The demonstration will increase integrated employment options for persons with psychiatric needs								
CRT Services for Adult Enrollees with a SPMI	Employment rate of people of working age receiving CRT services	DMH	CRT Program Enrollees	CRT Program Enrollees who are employed	CRT Program Enrollees who are eligible for employment	VT DOL; MSR	SFY2016	Logistic Regression; Descriptive Statistics
Hypothesis 6: IMD service recipients maintain community living as evidenced by low rates of inpatient readmission								
Treatment and other Alternatives to Inpatient Care	The percent of SUD IMD stays during the measurement period followed by a SUD IMD readmission for SUD within 30 days.	DVHA	SUD IMD Service Recipients	Number of readmissions to any SUD IMD that occurred within 30-days of discharge from a SUD IMD	Total number of SUD IMD admissions	MMIS	CY2018	Logistic Regression; Descriptive Statistics
	The rate of 30-day all-cause unplanned readmissions following psychiatric hospitalization in an inpatient facility	DVHA	SMI Study Group	Number of unplanned readmissions to any SMI IMD that occurred within 30-days of discharge from a SMI IMD	Total number of SMI IMD admissions as per SMI MP #4 (NQF #2860)	MMIS	CY2019	Logistic Regression; Descriptive Statistics

Exhibit 2-6: Evaluation Hypothesis, Measures, Cohorts and Analytic Approach: MAINTAIN OR REDUCE COSTS

Demonstration Goal: To Maintain or Reduce Cost of Care								
Primary Driver	Measure	State Steward	Target Population	Numerator	Denominator	Data Source	Baseline Year	Analytic Approach
Research Question 6: Will the demonstration maintain or reduce spending in comparison to what would have been spent absent the demonstration?								
Hypothesis 1: The demonstration will maintain or reduce spending in comparison to what would have been spent absent the demonstration								
Increase Community Integration	Actual aggregate expenditures versus budget neutrality limit	AHS/CO	Total Medicaid	N/A	N/A	MMIS	CY2017	Descriptive Statistics
	The SUD IMD PMPM trend rates and per capita cost estimates for each eligibility group defined in STC 66 for each year of the demonstration	AHS/CO	SUD IMD Service Recipients	N/A	N/A	MMIS	CY2018	
	The SMI IMD PMPM trend rates and per capita cost estimates for each eligibility group defined in STC 67 for each year of the demonstration	AHS/CO	SMI Study Group	N/A	N/A	MMIS	CY2019	
Research Question 7: Will improved access to primary care result in lower overall cost?								
Hypothesis 1: The Blueprint for Health initiative will contain or reduce per capita expenditures for Medicaid enrollees whose diabetes is in control								
Improve Quality of Care	Expenditures per capita for continuously enrolled Medicaid members, ages 18-75 whose Diabetes HbA1c was in control compared to those with poor control ¹⁰	DVHA	Blueprint Medicaid Enrollees	N/A	N/A	VCHURES; Medical Records; MMIS	CY2016	Descriptive Statistics
Hypothesis 2: The Blueprint for Health initiative will contain or reduce total per capita expenditures for Medicaid enrollees ages 1-64 years								
Increase Access to Preventive Care	Total risk adjusted expenditures per capita, excluding specialized program services, for Medicaid enrollees ages 1-64 years ¹¹	DVHA	Blueprint Medicaid Enrollees	N/A	N/A	VCHURES; Medical Records; MMIS	CY2016	Descriptive Statistics
	Specialized program risk adjusted expenditures per capita, for Medicaid enrollees ages 1-64 years ¹²	DVHA	Blueprint Medicaid Enrollees	N/A	N/A	VCHURES; Medical Records; MMIS	CY2016	

¹⁰ Total Expenditures are measured based on the allowed amount on claims, which included both the plan payments and the member's out-of-pocket payments (i.e., deductible, coinsurance, and copayments).

¹¹ Ibid

¹² Ibid

Demonstration Goal: To Maintain or Reduce Cost of Care

Primary Driver	Measure	State Steward	Target Population	Numerator	Denominator	Data Source	Baseline Year	Analytic Approach
<p>Patterns and Trends in Medicaid Costs associated with IMD service recipients will be examined. These measures capture all costs for the measurement year and are not associated with a demonstration hypothesis or SUD and SMI demonstration amendment budget neutrality reporting.</p>								
Exploratory	Per member per month (PMPM) Medicaid cost for individuals who received an IMD service in the measurement year	DVHA	SUD IMD Service Recipients	Total Cost of Care, with breakouts for federal and state expenditures and Non-SUD related cost	Total member months during measurement year	MMIS	CY2018	Descriptive Statistics
			SUD IMD Service Recipients	Total SUD-related cost, with breakouts for SUD-IMD, SUD-other treatment		MMIS	CY2018	Descriptive Statistics
			SUD IMD Service Recipients	Total annual cost of with breakouts for outpatient (non-ED), pharmacy, outpatient-ED, inpatient and Long-Term Care services.		MMIS	CY2018	
	Per member per month (PMPM) Medicaid cost for individuals who received an IMD service in the measurement year	DVHA	SMI Study Group	Total cost associated with MH services (non-inpatient) with breakouts for federal and state expenditures (SMI MP #32)	Total member months during measurement year	MMIS	CY2020	Descriptive Statistics
			SMI Study Group	Total cost associated with MH inpatient services, with breakouts for IMD (SMI MP #33)				
			SMI Study Group	Total annual cost of care with breakouts for outpatient (non-ED), pharmacy, outpatient-ED, inpatient and Long-Term Care services.				

In addition, AHS will undertake a formative evaluation of its one-time delivery system reform investments to support Accountable Care Organizations (ACO) and Medicaid community providers in delivery system reforms. Specifically, the State expects to encourage ACO-based provider led reform that features (a) collaboration between providers, (b) reimbursement models that move away from Fee-For-Service payment, and (c) rigorous quality measurement that aligns with the APM quality framework. CMS approved two new investments, during November of 2017, in the ACO delivery system reform category. These Investments and their expected outcomes are outlined in Exhibit 2-7.

Exhibit 2-8: 2018 Delivery System Reform Investments

ACO Delivery System Reform Investments	
Investment Initiative	Expected Outcome
<p><i>OneCare Vermont ACO Quality Health Management Measurement Improvement investment. This project is designed to assist the ACO in providing technical assistance to network providers in setting quality improvement targets and using a suite of new and enhanced information dissemination tools and reports</i></p>	<ul style="list-style-type: none"> OneCare’s analytics platform will be enhanced to meet the needs of OneCare’s multi-payer risk bearing ACO participants and the State’s All Payer ACO model.
	<ul style="list-style-type: none"> Care Navigator functionality will be improved to address the needs of care coordinators and patients with complex care coordination needs.
	<ul style="list-style-type: none"> OneCare’s information dissemination tools to support population health care coordination, and financial performance initiatives will show increased adoption and demonstrate value to OneCare providers.
<p><i>OneCare Vermont ACO Advanced Community Care Coordination investment. This project is designed to support an integrated care delivery system that is person-centered, efficient and equitable through the implementation of a community-based care coordination model.</i></p>	<ul style="list-style-type: none"> OneCare will support the development of a standardized team-based care model that integrates PCMHs with the continuum of care provider network.
	<ul style="list-style-type: none"> OneCare’s care coordination model for complex needs populations will expand to additional communities served in 2018 with several core components in place, bringing stability, scalability, and consistency to the care model.
	<ul style="list-style-type: none"> OneCare’s expanded investments in team-based care coordination will provide the resource necessary to build upon and strengthen existing partnerships between PCMHs and community-based providers; thus, enabling more individuals with complex needs to have access to care coordination services.
	<ul style="list-style-type: none"> OneCare will have a actionable framework, sustainable care coordination payment model and corresponding outcome (savings) model to effectively evaluate the long-term return on investment.

D. Data Collection and Assurances

Vermont’s public managed care-like model is managed by AHS through delegation to DVHA. Encounter, claims and cost data are available through the MMIS and will be made available to the evaluator as needed for purpose of evaluation. Existing agreements require that all IGA partners, ACOs and SUD programs included under the demonstration make data available to support evaluations and performance monitoring efforts. AHS does not anticipate problems with data collection and reporting.

AHS will use a variety of sources and methods to test the above hypotheses, including beneficiary surveys and provider claims data. AHS staff and independent evaluators will also analyze data from third-party sources, such as the U.S. Census Bureau and, if available through the All-Payer Model, Medicare claims data. Vermont data sources used to evaluate performance against demonstration goals will include:

Exhibit 2-9: Global Commitment to Health Data Sources

Global Commitment to Health Evaluation Data Sources		
Data Lead	Data Source	Brief Description
DAIL	Social Assistance Management System (SAMS)	Encounter data submitted to the State by providers used to identify residential settings used by enrollees in the Choices for Care program
	National Core Indicators Project (NCI)	Point in time survey data collected on LTSS and HCBS program participants used to assess community integration, choice and control for enrollees in Choices for Care, Developmental Disabilities and Traumatic Brain Injury programs
DMH	Monthly Service Reports (MSR)	Encounter data submitted to the State by providers used to identify consumers receiving specialized mental health services and to support the development of employment statistics for persons with a SPMI
DOL	Employment database	Wage and employment information submitted by employers to the State Department of Labor used to support the development of employment statistics for specialized populations
DVHA	Medicaid Management Information System (MMIS)	Claims data submitted to the State by providers used to support HEDIS® and HEDIS®-like performance, Medication Assisted Treatment, service utilization and cost metrics for all enrollees
	State Medicaid Eligibility and Enrollment files, including VT Health Connect Premium Assistance (VPA) files	Eligibility and enrollment detail for Medicaid beneficiaries used to determine enrollee aid category and stratify data into sub-groups, when applicable, including measures of health coverage for persons who received marketplace subsidies to purchase a QHP
	Consumer Assessment of Healthcare Providers and Systems (CAHPS)	Point in time survey data collected on Medicaid beneficiaries used to assess enrollee experience of care
VDH	Vital Statistics System	Public health birth, death and other vital records used to track overdose deaths attributed to Vermont residents
	Substance Abuse Treatment Information System (SATIS)	Provider, enrollee and encounter data used to assess rates of Medication Assisted Treatment and successful completion of residential treatment
	Household Health Insurance Survey	Point in time survey data collected on Vermonters used to determine rates of uninsured Vermonters
	Vermont Prescription Monitoring System (VPMS)	VPMS collects, monitors, and analyzes electronically transmitted data on all dispensed Schedule II, III, and IV controlled substances. Data on each prescription includes the prescribed drug, the recipient, the health care provider who wrote the prescription, and pharmacy that dispensed the prescription
GMCB	Vermont Health Care Uniform Reporting and Evaluation System (VHCURES)	Claims data submitted by all health plans in the State of Vermont used to assess outcomes for Blueprint to Health enrollees
ACO	Provider Encounter Data and Outcome Reports	Provider medical record and HEDIS® outcomes reported to the State and used to assess outcomes for ACO attributed enrollees

To limit administrative burden on providers, consumers, and staff and to eliminate duplicative evaluation efforts, the demonstration evaluation will coordinate and compile existing measures aimed at studying the impact of various health care initiatives under the demonstration. These include the:

- Global Commitment to Health Comprehensive Quality Strategy, including HEDIS® metrics;
- Global Commitment to Health SUD Monitoring Plan, including HEDIS® metrics;
- AHS Results Based Accountability Scorecards;
- National Core Indicators Project, (Developmental Disability and Aging and Other Disability Program Surveys) for Choices for Care, Developmental Disabilities and Traumatic Brain Injury program enrollees;
- Medicaid Quality Measures for enrollees attributed to an ACO; and
- Blueprint for Health Multi-Payer Delivery Reform Initiative for enrollees attributed to a Patient Centered Medical Home (PCMH) or Advanced Primary Care Practice.

E. Performance Measures, Data Source, Frequency and Sampling Methods

This evaluation incorporates the use of performance measures based on the following criteria: 1) evidenced based; 2) potential for improvement; 3) prevalence or incidence; 4) substantial impact on health status and/or health outcomes; 5) alignment with national measures; and 6) to the extent possible, adaptable measures across various practice settings.

The demonstration uses HEDIS® and AHS Results Based Accountability Scorecards for most of the targeted performance measures. Additionally, the evaluation will align measures and priorities with those collected as part of the All-Payer Model Medicare demonstration Agreement Appendix 1 [Found Here](#) on page 36, which includes alignment with the development of the Global Commitment to Health Medicaid ACO.

Using the measures identified in Exhibit 2-1 – 2-4 (above), AHS will determine whether efforts to improve access (e.g., primary care visits, ED visits, and providers accepting Medicaid), enhance quality (e.g., follow-up after hospitalization, medication management for those with asthma, and patient experience of care), contain costs (e.g., budget neutrality, and SUD IMD) and improve community integration were achieved. Performance measures specific to specialized programs and in-home and community services will also be included, such as ability of participants to live longer in their communities and experience an improved quality of life, choice and control.

Reported HEDIS rates will be benchmarked to NCQA Medicaid HEDIS means and percentiles as appropriate. Current performance targets and national benchmarks are identified in the States Comprehensive Quality Strategy [Found Here](#) and SUD Monitoring Protocol [Found Here](#)

One other important source of information to initiate and guide improvement efforts is the beneficiary. The most widely used instrument for collecting reports and ratings of health care services from the beneficiary's perspective is the CAHPS. CAHPS survey data allows entities to: 1) analyze performance compared to benchmarks; 2) identify changes or trends in performance; and/or 3) consider other indicators of performance. Vermont will combine CAHPS data with information collected through periodic surveys of targeted groups of demonstration enrollees.

Two hypotheses (listed below) will be measured through evaluation efforts associated with the Blueprint for Health Multi-Payer Advance Primary Care Practice initiative:

- Improved access to primary care will result in positive health outcomes;
- Improved access to primary care will result in overall lower cost for the healthcare delivery system.

The Blueprint for Health is a state-led, multi-payer program dedicated to achieving well-coordinated and seamless health services, with an emphasis on prevention and wellness. As such, the Blueprint employs several different approaches to incentivizing delivery system reform and increased quality and performance through payment reform. The foundation of the Blueprint model is a Multi-Payer Advanced Primary Care Practice (MAPCP) program. Participation is optional for providers, but mandatory for Vermont's commercial payers (with the exception of self-insured plans) and Medicaid.

Current participating payers in the Blueprint for Health include Medicaid, Medicare, Blue Cross Blue Shield of Vermont, MPV and CIGNA. As such, some measures reflect population health outcomes across payers and are not specifically stratified for Medicaid enrollees. As feasible within available resources, Blueprint performance and evaluation findings may include sub-analysis relative to Medicaid only participants.

III. EVALUATION DESIGN AND METHODS

In updating its existing Medicaid demonstration evaluation strategy as reflected in this document, the State has refined overarching demonstration hypotheses and identified study populations and levels of stratification for specialized programs, including SUD programs. The design identifies data sources, reviews general methods, data analytics and defines annual reporting requirements for the term of the demonstration. However, final techniques, technical specifications and study groups will be determined following a review of available data for integrity and completeness by the evaluator.

A. DESIGN

The evaluation will rely on quasi-experimental design to measure change over time and differential statistics to describe the population and findings. Results will be compared to statewide or national benchmarks, as applicable; and be assessed relative to a baseline to test the associated hypotheses. Evaluators may employ secondary analysis to reexamine existing data to address demonstration hypothesis or isolate Medicaid enrollees from the general population.

Both qualitative and quantitative methods will be used to address the hypotheses and research questions. Qualitative methods will include evaluation of CAHPS and NCI survey findings. Quantitative methods will be used to better understand the impact of demonstration implementation (i.e., the relationship that demonstration participation has on: access to care; quality of care; cost containment; and stable in-home and community alternatives to institutional care) and will include the use of descriptive/inferential statistics, and deductive analysis to generate relationships between variables that can be generalized to the broader Medicaid population.

The evaluation will rely predominately on a longitudinal design with logistic regression. Each demonstration year is measured against performance during the year prior to the demonstration, changes will be studied using a Logistic Regression. Propensity score matching methods will be used to characterize differences between Medicaid enrollees aligned with the ACO and Medicaid enrollees who are not aligned with the ACO. Propensity score matching will be used to control for potential variances in demographic and delivery system characteristics between the ACO-aligned and non-ACO groups (See subsection B below for a description of the ACO group and subsection C for a description of the statistical models).

Evaluation of change over time will be used for measures associated with aggregate demonstration and specialty program populations (including SUD IMD and those impacted by premium payments and subsidies). When using these methods, the evaluator is expected to consider and address various issues that might compromise the results, such as unexpected changes in program operations, enrollment or implementation of new program initiatives. If necessary, alternative methods might be required.

SMI -IMD AMENDMENT DESIGN

Upon amendment approval, Vermont showed that its current service array and delivery system meets all milestone requirements delineated in the CMS SMI Implementation Plan, with the exception of one sub-section. The State will be implementing a policy change that requires inpatient facilities to contact the member and their community provider within 72-hours post discharge. While the DMH Care Management Team follow up on discharges, the State does not have an explicit requirement for

discharging facilities to do the same. Vermont's SMI Information Technology Plan requires the State to engage in design and development activities for several EHR and information sharing enhancements to support CMS IT requirements. The demonstration allows for the continuation of FFP for these important services established prior to effective date of the amendment (See Section IE).

These considerations rule out the use of difference in difference, interrupted time series, repeated measures, and other similar designs. The SMI-IMD design will be longitudinal in nature with regression as described in Subsection C below. The study group will include all members who receive SMI-IMD services. If the SMI-IMD sample falls below 100% of eligible members, Vermont will conduct sensitivity analysis, when feasible, based on budget and data constraints.

Design approaches for each research question and hypothesis are presented in Exhibit 3-1.

Exhibit 3-1: Amended Evaluation Research Questions, Hypotheses and Design

Amended Evaluation Research Questions, Hypotheses and Design		
Research Question	Hypothesis	Design
Will the demonstration result in improved access to care?	The demonstration will result in improved access to community based medical care	Longitudinal w/Regression
	The demonstration will result in improved access to Medication Assisted Treatment for Opioid Use Disorder (OUD)	
	The demonstration will result in improved access to dental care	
	The demonstration will reduce the percentage of potentially preventable events*	
	The demonstration will reduce ED use for SUD per 1,000 enrollees	
	Premium requirements for eligible families above 195% FPL will not impede access to enrollment	
	The VPA Qualified Health Plan subsidy program will result in continued access to health care coverage	
Will value-based payment models increase access to care?	The Medicaid ACO will improve access to mental health care and SUD treatment	Propensity Score Matching
	The Medicaid ACO will improve access to adolescent well-care	Longitudinal w/Regression
	The Medicaid ACO will increase engagement of eligible members overtime	
Will the demonstration result in improved quality of care?	The demonstration will improve quality of care*	Longitudinal w/Regression
	ACO enrollees will show improved diabetes and hypertension control	
	The demonstration will increase preventive health screenings for female enrollees	
	The demonstration will improve mental health follow-up after psychiatric hospitalization*	
	The demonstration will improve initiation and engagement in SUD treatment.	
	The demonstration will improve enrollee experience of care and rating of the health plan	
	The demonstration will improve self-report of health status for enrollees with LTSS needs	
Will improved access to primary care result in improved health outcomes?	The Blueprint for Health will improve diabetes control for Medicaid members age 18-75	Longitudinal
Will the demonstration result in increased community integration?	The demonstration will increase community living for Choices for Care program enrollees	Longitudinal
	The demonstration will increase community integration for persons needing LTSS	
	The demonstration will increase choice and autonomy for persons needing LTSS.	
	The demonstration will increase integrated employment options for persons needing LTSS	Longitudinal w/Regression
	The demonstration will increase integrated employment options for persons with psychiatric needs	
	SUD and SMI IMD service recipients maintain community living as evidenced by low rates of IMD readmission*	
Will the demonstration maintain or reduce spending in comparison to what would have been spent absent the demonstration?	The demonstration will contain or reduce overall Medicaid spending	Pre/Post
	The demonstration will contain or reduce SUD and SMI IMD spending*	
Will improved access to preventive care result in lower overall costs for the healthcare delivery system?	The Blueprint for Health initiative will contain or reduce per capita risk-adjusted expenditures for enrollees whose diabetes is in control	Longitudinal
	The Blueprint for Health initiative will contain or reduce total per capita risk-adjusted expenditures for enrollees ages 1-64 years	

* Hypotheses with SMI related metrics and population cohorts

Delivery System Reform Investments

AHS will conduct an internal assessment of Vermont's ACO delivery system reform investments, implemented in 2018. The assessment will be based on grantee reporting, key informant information from AHS program staff, as well as community leaders, administrators, physician leaders, and others directly responsible for, or knowledgeable about, the new initiative or investment. As appropriate, fiscal analysis will be conducted to analyze expenditure information. Reports will be used to provide program staff and provide direction in shaping modifications that may be required to support more effective investments. Findings from the AHS assessment of these onetime awards will be included in state's second Interim Evaluation Report due December 31, 2020.

SUD IMD Mid-Point Assessment

The Global Commitment Evaluation will include a mid-point assessment of the SUD amendment submitted to CMS by December 31, 2020. The evaluator will collaborate with key stakeholders, including representatives of AHS, SUD treatment providers, beneficiaries, and other key partners in the design, planning and conducting of the mid-point assessment. The assessment will include an examination of progress toward meeting each milestone and timeframe approved in the SUD Implementation Protocol, and toward closing the gap between baseline and target each year in performance measures as approved in the SUD MP. The assessment will also include a determination of factors that affected achievement on the milestones and performance measure gap closure percentage points to date, and a determination of selected factors likely to affect future performance in meeting milestones and targets not yet met and about the risk of possibly missing those milestones and performance targets. The mid-point assessment will also provide a status update of budget neutrality requirements. For each milestone or measure target at medium to high risk of not being met, the evaluator will provide, for consideration by the state, recommendations for adjustments in the state's implementation plan or to pertinent factors that the state can influence that will support improvement. The evaluator will 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 timing of the Mid-Point Assessment, methodology used, and report produced by the independent evaluator are separate and distinct from the ongoing evaluation of the demonstration hypotheses and its performance over five years.

SMI IMD Mid-Point Assessment

The Global Commitment Evaluation will include a Mid-Point Assessment of the SMI amendment submitted to CMS by February 28, 2021. The assessment will include an examination of progress toward meeting each milestone in the approved SMI Implementation Protocol, and toward closing the gap in performance on the SMI metrics as approved in the SMI MP. The assessment will also include a determination of factors that affected achievement on the milestones and gap closure, and a determination of selected factors likely to affect future performance in meeting milestones and targets not yet met and about the risk of possibly missing those milestones and performance targets. The assessment will also provide a status update of budget neutrality requirements. For each milestone or measure target at medium to high risk of not being met, the evaluator will provide, for consideration by the state, recommendations for adjustments in the state's implementation plan or to pertinent factors

that the state can influence that will support improvement. The evaluator will 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 timing of the Mid-Point Assessment, methodology used, and report produced by the independent evaluator are separate and distinct from the ongoing evaluation of the demonstration hypotheses and performance over five years.

Evaluation Period and Reporting

The Global Commitment demonstration is an all-inclusive program designed to align efforts in primary care, behavioral health and LTSS. The 2017 demonstration extension was designed to align Medicaid’s Next Generation ACO model with Vermont’s All Payer Model Medicare demonstration. In July 1, 2018 the demonstration was amended to continue SUD residential services delivered in IMD settings. In December of 2019, the demonstration was amended to continue FFP for psychiatric services in IMD settings. To capture changes overtime, the evaluation design includes several baseline measurement periods including: an overall baseline period of 2016 for most population measures; a 2017 baseline for ACO attributed Medicaid enrollees; a 2018 baseline for LTSS NCI measures of integration, choice and control for Choices for Care enrollees and Medicaid enrollees who have a TBI; a 2018 baseline for certain measures of SUD program change, and a 2019 baseline for certain measures related to the SMI amendment.

The resulting evaluation includes multiple study periods across Calendar Years 2016 and 2021, with an extensive IMD study previously conducted for Calendar Years 2013 through 2016, submitted to CMS on April 1, 2018. The evaluation period is depicted in Exhibit 3-2.

Exhibit 3-2 Evaluation Study and Reporting Period

Evaluation Study Period 2016 -2021						
	Year 1	Year 2	Year 3	Year 4	Year 5	
CY2016	CY2017	CY2018	CY2019	CY2020	CY2021	CY2022
Extension Baseline	ACO Baseline	NCI-AD Baseline (LTSS) SUD Baseline				
		Interim Findings and IMD Report April 1 2018	SUD Amendment July 1, 2018	Interim Report SUD Mid-Point Assessment		Final Evaluation Report
			SMI Baseline	SMI Amendment and Revised Design	SMI Mid-Point Assessment	

In addition to the five evaluation report deliverables listed below, the State will compile data and summarize demonstration performance to-date for CMS in quarterly and annual reports and SUD Monitoring report. An independent evaluator will support all demonstration evaluation reporting requirements.

- Interim Evaluation Report and IMD Study (Draft April 1, 2018, final due 60-days post CMS feedback);
- Interim Evaluation Report (Draft December 31, 2020, final due 60-days post CMS feedback);
- SUD Mid-Point Assessment (December 31, 2020);
- SMI Mid-Point Assessment (February 28, 2021); and

- Summative Evaluation Report (Draft within 18 months of the end of the approval period, December 21, 2021, final due 60-days post CMS feedback).

The independent evaluator will support the State of Vermont, as needed, in its efforts to complete rapid cycle assessments for new payment and service delivery reform models including but not limited to ACO model enhancements, efforts to support integration across providers and new delivery system investments.

B. TARGET AND COMPARISON POPULATION

In Vermont's demonstration, Medicaid eligibility is synonymous with enrollment in the public managed care-like model making general comparison and/or control groups difficult. However, two health care initiatives were identified where data for Medicaid comparison groups may be available over time, the Blueprint for Health and the Vermont Medicaid Next Generation ACO. Whenever possible matched samples for participants in these reforms and those not receiving programs services will be used to explore differences.

The evaluation will study the impact of the demonstration on all enrollees e.g., total Medicaid population (enrollees participating in specialized programs (e.g., ID/DD, CFC, CRT, TBI, ACO Attributed), enrollees participating in non-specialized programs) as well as examine hypothesis as they relate to specialized programs and for enrollees with SUD treatment needs.

The SUD and psychiatric treatment continuums in Vermont represent statewide models. IMD treatment facilities serve residents from across the state. Thus, regional comparison groups for enrollees with SUD and SMI are not available. In addition, residential placement decisions for SUD are made based on nationally recognized ASAM level of care guidelines; thus, individuals admitted to a residential SUD program have a clinically different profile and level of care need than those who are not admitted. These clinical differences eliminate the possibility of defining a matched sample of enrollees who receive services versus those who did not. Screening for admission to psychiatric care facilities also includes standardized level of care assessments to determine clinical need. Lastly, all Medicaid beneficiaries are enrolled in the demonstration. Those who meet SUD or SMI criteria are eligible for services under each amendment. Given this statewide public managed care model, no comparison groups are anticipated for enrollees with a SUD or SMI diagnosis.

ACO STUDY GROUP

To establish a method for comparison, Propensity Score Matching will be used to select demographically comparable control and treatment groups from the larger population of ACO eligible members to minimize the variance between outcomes in the groups attributable to demographic factors. Two groups will be identified:

1. ACO aligned: This group represented Medicaid members who were attributed to the Medicaid ACO and who met the criteria for the measure being studied, e.g., the treatment group.
2. ACO eligible but not aligned: This group represented Medicaid members who were eligible for Medicaid ACO program, but who were not attributed to the ACO and who met the criteria for the measure being studied, e.g., the comparison group.

Medicaid ACO eligibility currently excludes members who are receiving CFC LTSS or specialized support through the CRT, TBI, DDS or IHCBS programs described in Section I of this document.

SMI STUDY GROUP

For purposes of assessing the IMD demonstration authorities adult Medicaid members between the ages of 21 and 64 who received IMD services during the measurement period) will serve as the study population.

C. Data Analysis

The evaluation data analysis will consist of both exploratory and descriptive strategies and incorporate univariate, bi-variate, and multi-variate techniques. Analysis will be performed to systematically apply statistical and/or logical techniques to describe, summarize, and compare data within the state and across time, and to prepare data, wherever possible in a manner that permits comparison to results from other states applying the same methodology (e.g., HEDIS reports).

Descriptive statistics will be used to describe the basic features of the data and what they depict, and to provide simple summaries about the sample and the measures. Together with simple graphics analysis, the descriptive statistics form the basis of quantitative analysis of data. They are also used to provide simple summaries about the participants and their outcomes. An exploratory data analysis is used to compare many variables in the search for organized patterns. Data will be analyzed as rates, proportions, frequencies, measures of central tendency (e.g., mean, median, mode), and/or qualitatively analyzed for themes.

As appropriate, analysis methods include Logistic Regression, ANOVA, and Propensity Score Matching with T-test. These tests are used for comparing sample and population means against each other; this can be the same population across time or within the same time but receive different treatments, or one group does not treatment while others do. T-tests and ANOVA are appropriate when granular data (patient level) is not available but population level means and standard deviations are, the outcome variable is continuous and the objective is to determine whether the mean of a certain outcome variable of interest is significantly different between two or more groups. T-tests allow for comparison of means between two groups whereas ANOVA allows this to be done for more than two groups.

The traditionally accepted risk of error ($p \leq 0.05$) will be used for all comparisons.

Logistic Regression Model

A longitudinal design with regression will be used to examine the statewide impact of the demonstration on evaluation measures. The outcome of interest in the majority of measures are binary, in that the member either received/engaged in the outcome of interest or did not (yes or 1 /no or 0) as denoted. The probability of 'yes' is 'p' and the probability of 'no' is thus '1-p'. ' $\ln = \log(p/1-p)$ ' is the log odds (or logit) which we estimate with year where the base year is typically 2016 (effect is captured in the intercept) and the years following 2016 are interpreted as incremental effects compared to base year 2016. The design examines whether the incremental years are statistically

significant on the log-odds of saying yes vs no to the measures of interest. If they are statistically significant, the interpretation is that the year in question (e.g., each year of the demonstration extension) shows a marked difference compared to the base year. This combined with a comparison of the rates ($p = \# \text{ saying yes} / \text{total } \# \text{ of that year}$) show that there was a statistically significant increase (or decrease) in the rate of yes to a measure from base year 2016 to a future year. Outcomes (which are always binary in these cases) will be calculated annually for each of the five demonstration years and a baseline period.

$$l = \ln \frac{p}{1-p} = \beta_0 + \beta_1(\text{year}) + \varepsilon$$

which is solved algebraically for p:

$$p = \frac{1}{1 + e^{-(\beta_0 + \beta_1(\text{year}) + \varepsilon)}}$$

Propensity Score Matching

Propensity Score Matching with T-test will be used for evaluating ACO and non-ACO comparison groups. Propensity Score Matching is intended to reduce confounding variables associated with the observational data. Variables examined for the ACO analysis will include age, geography (recipient county of residence), aid category code and gender. Geography is characterized as “North” and “South” with Vermont counties classified as illustrated in Exhibit 3-3.

Exhibit 3-3: Propensity Score Matching Geographical Categories

PSM Geographic Category	Vermont County (Recipient Place of Residence)
North	Franklin, Grand Ilse, Chittenden, Orleans, Caledonia, Essex, Lamoille, Washington, Addison
South	Bennington, Rutland, Windham, Windsor, Orange

The analysis will account for these variables by selecting similar looking control and treatment groups from the larger population such that the groups look comparable across the demographic factors. A logit regression will be used to estimate propensity scores and matching using the propensity score. After the matching, sample means will be compared between the treatment and control groups to verify that they are indeed comparable before regressing the outcome of interest. This allows for an estimate of the effect of the treatment on the outcome.

The evaluator will use propensity score matching in alignment with Rosenbaum and Rubin (1983) where the propensity score is the probability of treatment assignment conditional on observed baseline covariates (the demographic factors: gender, age, year, geo, and the various GCMEG values enumerated below):

$$P(Z_i | \text{gender, age, year, geo, one-hot encoded GCMEG variables}) = \frac{e^{-(\beta_0 + \beta_1(\text{year}) + \beta_2(\text{gender}) + \beta_3(\text{age}) + \beta_4(\text{geo}) + \beta_5(\text{GCMEG}_{\text{newadultnochild}}) + \beta_6(\text{GCMEG}_{\text{ABD}}) + \beta_7(\text{GCMEG}_{\text{newadultwithchild}}) + \beta_8(\text{GCMEG}_{\text{SCHIP}}) + \beta_9(\text{GCMEG}_{\text{underinsured}}))}}{(1 + e^{\beta_7(\text{GCMEG}_{\text{newadultwithchild}}) + \beta_8(\text{GCMEG}_{\text{SCHIP}}) + \beta_9(\text{GCMEG}_{\text{underinsured}})})}$$

The GCMEG field which determines how a member qualified for Medicaid will be one-hot encoded to become the following binary variables: GCMEG newadultnochild, GCMEG ABD, GCMEG newadultwithchild, GCMEG SCHIP, and GCMEG underinsured; p denotes the probability of the outcome measure being true/yes/fulfilled, i.e. $Y = 1$ and e is the natural log base.

The propensity score provides balancing such that conditional on a propensity score, the distribution of the demographic variables enumerated above is not statistically significantly different. After deriving the propensity scores, the control and treatment groups are matched using nearest neighbor search. Then the design will verify that covariates above are all balanced in the post-matching groups and then compare the results using a t-test.

Sensitivity Analysis

In addition to the analysis described above, the design will include a linear probability model where appropriate to examine the robustness of results derived the logistic regression model. Findings will report any occurrence where the results of statistical probability at the 0.05 level conflict between methods.

SUD IMD Analysis

SUD evaluation measures associated with each goal and hypothesis are outlined in Exhibits 2-1 through 2-4. In addition to hypothesis testing, the evaluation will monitor the impact of IMD stays on total Medicaid expenditures for SUD IMD recipients. Cost of care measures for SUD IMD recipients, not associated with a hypothesis will be examined for year over year change and utilization trends. Cost will be examined relative to drivers such as ED utilization, inpatient hospitalization and pharmacy services. For example, access to IMD services may result in improved engagement in MAT treatment, and subsequently increase expenditures; while a decline in SUD related ED use and hospitalizations may result in corresponding decreases in expenditures. The evaluation will include an exploratory examination of utilization and cost patterns and trends, for SUD IMD recipients, by categories of service. The evaluation may engage further analysis and impact assessments depending on staff and budget, data availability, administrative burden and value to program managers and policy makers.

SUD hypothesis will be examined, where indicated in Exhibits 2-3 through 2-6, using the Logistic Regression for year over year change throughout the evaluation period. Descriptive statistics such as frequency, average, percent change, and comparison to national results, where applicable, will be employed for all SUD measures.

SMI IMD Analysis

Mental health evaluation measures associated with each goal and hypothesis are outlined in Exhibits 2-3 through 2-6. Hypotheses will be examined, where indicated in Exhibits 2-3 through 2-6, using a Logistic Regression for year over year change throughout the evaluation period. In examining the impact of changes in ED utilization, the evaluation will consider potentially confounding policy in the

CRT program. CRT program enrollees who may require inpatient care to stabilize acute exacerbation of their condition, must be screened by a designated mental health professional prior to admission. This screening typically occurs in the ED. This policy will impact SMI demonstration Goal Area #1 (Reduced utilization and lengths of stay in EDs among Medicaid beneficiaries with SMI or SED while awaiting mental health treatment in specialized settings).

Descriptive statistics such as frequency, average, percent change, and comparison to national results, where applicable, will be employed for all SMI IMD measures. The evaluation will include an exploratory examination of utilization and cost patterns and trends, for SMI IMD recipients, by categories of service. Cost trends will be explored in alignment with CMS guidance for SMI-IMD Evaluation Design Appendix C [Found Here](#). The evaluation may engage further analysis and impact assessments depending on staff and budget, data availability, administrative burden and value to program managers and policy makers.

Adjustments for Alternative Payment Models

Vermont has been engaged in health care and payment reform since the inception of the demonstration in 2005. In many cases, specialized programs no longer employ fee-for-service claiming and encounter data may be stored in multiple Medicaid legacy systems across AHS. In cases where programs have moved away from fee-for-service payment models, modified HEDIS® protocols will be used to assure data is complete and accurately adjusted. Specifically, modifications will be made to the following HEDIS® measures to account for alternative payment models: follow-up after hospitalization for mental illness (7 and 30-days); and initiation and engagement in treatment for alcohol and other drug dependence. Any additional modifications will be determined by the evaluators and AHS and catalogued in each evaluation report.

Blueprint for Health Population Adjustments

Blueprint for Health is a multi-payer reform effort and, as such data is typically aggregated for the entire population irrespective of payer. Through its analytics vendor, Onpoint Health Data, Blueprint to Health links provider reported clinical data to de-identified VHCURES claims data. Onpoint de-identifies the clinical data using the same algorithms to hash the identifiers as were used by insurers for the VHCURES data. Using this method the vendor is able to link records between the two de-identified datasets using the hashed, or encrypted, identifiers. Blueprint to Health diabetes measures will be analyzed by its vendor and a stratified for the Medicaid population.

Annually, the Blueprint to Health examines total expenditures and specialized program expenditures for Medicaid patients attributed to Blueprint practices. However, prior to examining findings, the vendor first risk-adjusts the expenditure values. To do so, extreme values are capped, and a regression-based adjustment procedure is used to create an individual-level risk-adjusted expenditure value. The average of this risk-adjusted value is reported.

D. DATA COLLECTION AND VALIDATION

Data cleaning and validation for each measure type is described below:

HEDIS® and HEDIS®-Like measures: Vermont’s HEDIS® contractor provides the State access to online applications and software that enable the state to complete HEDIS® and other measure reporting. Vermont staff input MMIS data into the system based on predefined specifications for the vendor system. In the event the State is unable to access the system, DVHA sends the state-formatted data to the contractor for analysis and processing. Once analyzed, if the state-formatted input data is determined to be incorrectly formatted, the vendor creates a translation process and inputs the data. If data that is required for the system was omitted from state formatted file, the State will modify the data as requested by the vendor. The vendor then performs a data audit processes to identify problems and inconsistencies with input data. The vendor works with the State to answer questions and provide feedback to resolve discrepancies in HEDIS output results.

HEDIS® results are independently validated each year by the State’s External Quality Review Organization.

Medical Record Retrieval: Upon receipt of a “request file” from the State the vendor conducts a data quality assurance on the request file to correctly identify provider information (verifying the provider contact data, organizing requests by group ID versus individual provider ID as appropriate for larger practices). The vendor contacts each medical provider telephonically, by mail, or by fax (as appropriate) to request Medical Records for the appropriate dates of service and sending via fax or mail the medical record request confirmation letter and member pull list. If a Provider indicates it is unwilling to mail, fax, or upload the requested Medical Records to the Contractor, the Contractor will notify the State, and the State will engage its provider relations group to contact the provider and encourage remote retrieval participation. If the Provider is still unwilling to participate in remote retrieval efforts following the State’s provider relations engagement, the files will not be included in the sample. The vendor verifies that any scanned or imaged records meet quality standards related to clarity, and that the record is associated with the correct member. All imaged records are available for download or through electronic delivery via secure File Transfer Protocol (FTP).

Nationally Recognized Surveys: The Global Commitment evaluation relies on several standard, nationally recognized Surveys for data (e.g., CAHPS, NCI) as described in Section II. Information for each survey is collected by vendors certified in the administration of the national survey, according to standards of fidelity created by national organizations.

The Global Commitment evaluation team schedules ad hoc meetings with state subject matter experts if anomalies are found in the data. For example, results or sample size that represent a significant departure from the prior year without clear explanation will prompt individual meetings with data and program experts. In addition, the evaluation team inventories changes in the measure specifications, if any, and any changes in program operations or policy that may have occurred since the last yearly data submission.

Historical Data

Vermont’s baseline data refers to historical data points available for review, trend analysis and longitudinal examination. The most recent findings for overall Global Commitment efforts, including a focused study of Vermont IMD authorities can be found in the Interim Evaluation Report #1 submitted April 1, 2018 to CMS [Found Here](#). On-going performance monitoring and existing evaluation efforts

generated in addition to the formal evaluation reports identified in the STCs can be found online as outlined below.

Blueprint for Health [Found Here](#)

Medicaid HEDIS Measures [Found Here](#)

Medicaid CAHPS Survey Results [Found Here](#)

Medicaid ACO Shared Savings [Found Here](#)

Developmental Disability Services National Core Indicators Results [Found Here](#)

AHS Results Based Scorecards [Found Here](#)

IV. METHODOLOGICAL LIMITATIONS

Vermont's Global Commitment to Health Section 1115 demonstration, is a long-standing project initiated in 2005, which incorporated a Medicaid expansion project that began in 1999. The demonstration served individuals and families up to 300% of the FPL prior to the more recent Affordable Care Act (ACA) eligibility and expansion. In 2013, Vermont transitioned to the ACA and the State's LTSS program also was incorporated under the overarching umbrella of the Global Commitment to Health demonstration.

Under the demonstration, Medicaid eligibility is synonymous with enrollment in the public managed care-like model. This makes traditional time series, comparison and/or control groups not attributed to the demonstration difficult. Vermont's decade long commitment to health care reform and the comprehensive nature of the demonstration offer several additional challenges for evaluation design and data use, as outlined in the remainder of this section.

A. DATA LIMITATIONS

Dual Eligible Members

Many participants in Vermont's specialized programs are dually eligible for Medicare and Medicaid. The absence of Medicare claims data presents challenges for certain metrics such as total cost of care, rates of preventive screens, follow-up after hospitalization. The stratification of measures for sub-population of enrollees who receive specialized services is impractical in most circumstances. As Medicare reforms mature, the AHS will seek access to Medicare data as part of its involvement in the All-Payer Model Medicare demonstration.

Existing Payment Reforms

As reported earlier, Vermont has been engaged in health care and payment reform since the inception of the demonstration in 2005. In many cases, specialized programs no longer employ fee-for-service claiming and encounter data may be stored in multiple legacy systems across AHS. In cases where programs have moved away from fee-for-service payment models, modified HEDIS® protocols, noted above, will be used to assure data is complete and accurately adjusted when stratified for specialized populations.

Use of Administrative Data

Data used in this analysis includes multiple administrative data sets. Limitations include: inconsistent data collection across sub-populations; inclusion of other payers; inconsistent data entry across provider or service types; lack of available data for all study years due to changes in IT systems or data storage methods. These inconsistencies will be reviewed to limit the impact on design rigor.

The VHCURES data warehouse provides valuable information on claims over time, however information is de-identified. Through its analytics vendor Onpoint Health Data Blueprint to Health links clinical data to de-identified VHCURES claims data. Onpoint de-identifies the clinical data using the same algorithms to hash the identifiers as was used by insurers for the VHCURES data. Using this method, the vendor is able to link records between the two de-identified datasets using the hashed, or encrypted, identifiers.

The SUD aspects of the evaluation may be limited by its reliance on claims and diagnostic codes to identify the beneficiary population with SUD. These codes may not capture all participants especially if the impact or severity of the SUD is not evident on initial assessment. For example, an ED visit for a broken arm due to inebriation may not be coded as SUD related, if the member does not present as inebriated, the ED provider has not ascertained causation, or the member fails to disclose the cause.

B. DESIGN LIMITATIONS

Isolation from Other Initiatives

In general, external factors are not expected to significantly affect the assessment of hypotheses presented in this evaluation plan. Over the past several years the State sought to align its health care reforms across all populations and payers. The final Medicaid demonstration extension and Medicare All-Payer Model were designed to create a seamless system. However, where market conditions and other contextual factors (e.g., provider or geographical differences) could have an impact, AHS and its evaluators will develop approaches to quantify and/or isolate the impact of such factors.

Based on staff, budget and data considerations, the State will explore the feasibility of comparing outcomes for members who may be attributed to a specific initiative with those who are not involved in the initiative.

Lack of True Experimental Comparison Groups

IMD facilities serve residents from across the state. Thus, regional comparison groups are not available. In addition, residential placement decisions are made based on nationally recognized ASAM level of care guidelines; thus, individuals admitted to a residential SUD program have a clinically different profile and level of care need than those who are not admitted. These clinical differences eliminate the possibility of matched sample of enrollees who receive services versus those who did not. Lastly, all Medicaid enrollees who meet SUD and SMI criteria are eligible for the demonstration.

Due to the short duration of the SMI amendment (effective January 1, 2020, 2021), interrupted time series is not a suitable method. Minimally, seven to eight pre and post intervention data points are needed to perform statistically meaningful measurements with this design. HEDIS, CAHPS and HEDIS-like measures are produced yearly. The State does not have staff or fiscal resources to produce more frequent results. Due to the modest change year to year, annual reporting is the most cost-effective options for tracking these results. The yearly production of results limits the use of an Interrupted Time Series design. In addition, individuals receive care as clinically needed, ruling out a repeated measures design.

Continuity of Medicaid FFP and Services

The Global Commitment demonstration is a long-standing demonstration and collaboration with CMS has allowed vital inpatient care to be funded for many years. In addition, all SUD and SMI IMD treatment facilities are existing statewide providers who have been delivering care to Medicaid enrollees prior to the implementation of the SUD demonstration amendment on July 1, 2018 and the SMI IMD amendment on January 1, 2020. The SUD and SMI amendments allow the state to continue services that have been in place since the inception of the demonstration, the amendments do not offer new independent variables expected to result in change over the course of the demonstration.

Persons with a SMI have been receiving inpatient care as part of a continuum of care including designated hospitals and community-based designated agencies. Medicaid FFP was authorized initially through an IMD waiver and as part of Pre-paid Inpatient Health Plan for individuals in the CRT program (1999-2010), as part of a Medicaid Managed Care savings/investment model (2011-2019), and most recently as part of the IMD demonstration (2020-2021). Subsequently, the use of an Interrupted Time Series and other similar designs are not appropriate.

Medicaid Enrollment/Disenrollment

Medicaid enrollment changes on an annual basis related to eligibility. For example, someone may be attributed to a study cohort in year one, disenroll in year two and reenroll in year three. In addition, as innovations such as the Medicaid ACO or Blueprint for Health expand in membership or focus overtime, membership in any potential comparison group decreases overtime.

ATTACHMENTS

1. PROCUREMENT STRATEGY AND EVALUATOR QUALIFICATIONS

Procurement for an evaluation contractor to assist the State in executing its demonstration evaluation plan was pursuant to the State of Vermont Agency of Administration Bulletin 3.5 processes [found here](#).

The State retains responsibility for rapid cycle assessment reports, monitoring delivery system and other investments and overall demonstration performance monitoring, including the SUD Monitoring Plan. Global Commitment to Health HEDIS® measures are independently validated by the State's External Quality Review Organization (EQRO). To mitigate any potential conflict of interest, the evaluation contractor is responsible for secondary analysis of the State's findings, benchmarking performance to national standards, evaluating changes over time, isolating key variables and interpreting results. As part of the focused IMD evaluation, the evaluator was responsible for final measure selection, identifying, if viable, other State systems that may serve as comparisons, conducting all data analysis, and measuring change overtime to address study questions.

The State issued one procurement for all evaluation activities and the production of required CMS reports. Bidders were given the option of working with a subcontractor on the IMD and/or other components of the design. The successful bidder demonstrated, at a minimum, the following qualifications:

- The extent to which the evaluator can meet State RFP minimum requirements;
- The extent to which the evaluator has sufficient capacity to conduct the proposed evaluation, in terms of technical experience and the size/scale of the evaluation;
- The evaluator's prior experience with similar evaluations;
- Past references; and
- Value, e.g., the assessment of an evaluator's capacity to conduct the proposed evaluation with their cost proposal, with consideration given to those that offer higher quality at a lower cost.

2. EVALUATION TIMELINE

The State's evaluation budget and timelines are tentative pending data sharing schedules established with the evaluation contractor and annual legislative budget approvals. The timeline and budget may be modified if terms of the current demonstration agreement are amended during the project period. AHS will report on progress and any known challenges to the evaluation budget, timelines and implementation in its quarterly and annual demonstration reports to CMS. Attachment 3 provides an overview of the AHS proposed evaluation budget. Outlined below and on the following pages are the expected timelines and major evaluation related milestones.

Demo Year 12: (1/1/2017-12/31/2017)

Activity/Milestone	Extension Year 1 (2017)											
	Month											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Draft Evaluation Design	X	X										
CMS Review			X									
Incorporate CMS Revisions				X								
Final Evaluation Design									X			
Publish Evaluation Design									X			
Procure Independent Evaluator				X	X	X	X	X				
Finalize Research Methods									X	X		
Finalize Performance Measures									X	X	X	
Collect, Analyze, Interpret Data											X	X
Disseminate AHS Rapid Cycle Assessment Findings for Feedback				X			X			X		

Demo Year 13: (1/1/2018-12/31/2018)

Activity/Milestone	Extension Year 2 (2018)											
	Month											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Collect, Analyze, Interpret Data	X	X	X	X	X	X	X	X	X	X	X	X
Create Draft Interim Evaluation Report #1	X	X										
Disseminate Preliminary Findings for Feedback		X										
Submit Draft Interim Evaluation Report #1 to CMS (including IMD study)				X								
Develop SUD Monitoring Protocol							X	X	X	X	X	
Revised Evaluation Design for SUD Amendment									X	X	X	X
Disseminate AHS Rapid Cycle Assessment Findings for Feedback				X			X			X		

Demo Year 14: (1/1/2019-12/31/2019)

Activity/Milestone	Extension Year 3 (2019)											
	Month											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Collect, Analyze, Interpret Data	X	X	X	X	X	X	X	X	X	X	X	X
Incorporate CMS Comments in Revised Evaluation Design		X	X	X								
Submit and Final Evaluation Design			X	X	X							
Disseminate AHS Rapid Cycle Assessment Findings for Feedback				X			X			X		

Demo Year 15: (1/1/2020 – 12/31/2020)

Activity/Milestone	Extension- Year 4 (2020)											
	Month											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Collect, Analyze, Interpret Data	X	X	X	X	X	X	X	X	X	X	X	X
Data Cleaning and Validation for Prior Year	X	X	X									
Calculation of Results			X	X	X							
Independent Validation of HEDIS®						X	X					
Statistical Analysis							X	X	X			
Conduct SUD Mid-Point Assessment							X	X	X	X	X	X
Conduct SMI Mid-Point Assessment									X	X	X	
Create Draft Interim Evaluation Report, including SUD Mid-Point Assessment									X	X		
Disseminate Interim Evaluation Report Findings and SUD Mid-Point Assessment for Feedback									X	X		
Finalize Draft Interim Evaluation Report and SUD Mid-Point Assessment											X	X
Submit Interim Evaluation Report and SUD Mid-Point Assessment to CMS												X
Create and Disseminate SMI Mid-Point Assessment Report												X
Disseminate AHS Rapid Cycle Assessment Findings for Feedback				X			X			X		

Demo Year 16: (1/1/2021-12/31/2021)

Activity/Milestone	Extension Year 5 (2021)											
	Month											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Collect, Analyze, Interpret Data	X	X	X	X	X	X	X	X	X	X	X	X
Data Cleaning and Validation for Prior Year	X	X	X									
Calculation of Results			X	X	X							
Independent Validation of HEDIS®						X	X	X				
Statistical Analysis							X	X	X			
Finalize Draft SMI Mid-Point Assessment Report	X											
Submit SMI Mid-Point Assessment Report to CMS		X										
Incorporate CMS Comments on Draft Interim Evaluation Report		X	X									
Submit Final Interim Evaluation Report and SUD Mid-Point Assessment			X	X								
Incorporate CMS Comments on SMI Mid-Point Assessment Report					X							
Submit Final SMI Mid-Point Assessment						X						
Publish Final Interim Evaluation Report and SUD Mid-Point Assessment							X					
Publish Final SMI Mid-Point Assessment							X					
Disseminate AHS Rapid Cycle Assessment Findings for Feedback				X			X			X		

Post Demo: (1/1/2022-9/30/2022)

Activity/Milestone	Post Extension (2022)											
	Month											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Data Cleaning and Validation for Prior Year	X	X	X									
Calculation of Results			X	X								
Statistical Analysis			X	X								
Create Summative Evaluation Report	X	X	X	X								
Disseminate Draft Summative Evaluation Report Findings for Feedback			X	X								
Submit Draft Summative Evaluation Report to CMS						X						
Incorporate CMS Comment							X					
Submit Final Summative Evaluation Report to CMS							X					
Publish Final Summative Evaluation Report								X				

3. AHS PROPOSED EVALUATION BUDGET

The Vermont Global Commitment to Health Section 1115 demonstration evaluation includes state administrative staff and an independent evaluator. Assuming no further changes to the Evaluation Design, independent evaluator costs are expected to be \$844,520 for the evaluation period 2017-2022. The estimated budget amount will cover independent evaluation expenses, including salary, fringe, administrative costs, other direct costs such as travel for data collection, conference calls, etc., as well as, all costs related to quantitative and qualitative data collection and analysis, and report development.

Vermont AHS will also incur costs for state staff to efficiently and effectively support the independent evaluator. State costs are expected to be similar to the level needed by the independent evaluator. That is, state data, analytic, and research staff will have to undertake data gathering, prepping, and submitting information to the evaluator in line with the research goals and objectives.

State researchers will provide technical assistance, will create intermediate data products, will share their in-depth knowledge of existing state programs; state populations; Medicaid operations; and will leverage existing relationships with partner organizations. They will also provide information on state IT, local and provider information technology systems as well as; data structures, collections, definitions; and compliance with state policies such as privacy and security.

A description of external evaluator costs by deliverable area is provided in Exhibit A-1 below.

Exhibit A-1 Independent Evaluation Budget

Evaluation Budget: Global Commitment to Health Section 1115 Demonstration (w/SMI Amendment Effective Jan. 1, 2020)							
Project Task Area	Year 1 (2017)	Year 2 (2018)	Year 3 (2019)	Year 4 (2020)	Year 5 (2021)	Year 6 (2022)	Total by Task Area
Project Initiation & Final Evaluation Design	\$21,720						\$21,720
Initiate IMD Sub-evaluation	\$46,800	\$31,200					\$78,000
Periodic Rapid Cycle Assessment Reports and Innovative Changes	\$5,680	\$8,240	\$7,680	\$7,680	\$7,680		\$36,960
Interim Evaluation Report #1	\$38,960	\$114,600	\$10,240				\$163,800
Interim Evaluation Report #2			\$30,600	\$101,320	\$10,240		\$142,160
SUD Mid-Point Assessment			\$41,960	\$61,800			\$103,760
Summative Evaluation Report #2					\$66,800	\$66,800	\$133,600
Other Project Activities	\$7,360	\$7,360	\$7,360	\$7,360	\$7,360		\$36,800
Revised GC Evaluation Design w/SMI amendment				\$41,200	\$14,480		\$55,680
SMI/SED Mid-Point Assessment				\$61,800	\$10,240		\$72,040
Annual Total	\$113,160	\$161,400	\$97,840	\$281,160	\$116,800	\$74,160	\$844,520

ATTACHMENT L
DSHP Claiming Protocol [RESERVED]

ATTACHMENT M
Investment Claiming Protocol [RESERVED]

ATTACHMENT N SUD Implementation Protocol

Introduction

The overall goal of this amendment request is to maintain and enhance the flexibility and availability of opioid use disorder (OUD), substance use disorder (SUD), and mental health treatment supports under the Global Commitment to Health Demonstration, and to promote a comprehensive and integrated continuum of mental and physical health, OUD/SUD treatment, and long-term services and supports for all Vermonters receiving Medicaid services.

Vermont recognizes that a continuum of services and evidence-based practices include attention to co-occurring mental health disorders and to the physical health impacts of OUD/SUD for persons seeking treatment and recovery services. Vermont intends to build a fully integrated physical health, mental health, OUD/SUD and recovery support continuum. To support this goal, Vermont seeks continued flexible federal funding for residential treatment programs, and in how the American Society of Addiction Medicine (ASAM) and other evidence-based criteria are applied to triage plans of care for persons struggling with addictions and co-occurring mental health and physical health conditions. This triage includes identifying the settings best suited to serve those enrollees with OUD/SUD and co-occurring conditions. For example, in some cases immediate access and treatment in a residential setting is the best course of treatment, while for others immediate stabilization of a psychiatric crisis or medically managed withdrawal, in a general hospital or specialized inpatient facility, followed by intensive addiction treatment may be clinically warranted. Under the SUD demonstration opportunity, only stays in IMDs for which SUD treatment is the primary purpose of treatment are allowed.

The goals of Vermont's section 1115 demonstration are fully aligned with CMS OUD/SUD demonstration goals, as illustrated in Exhibit A below.

Exhibit A – Shared Demonstration Goals

Global Commitment to Health Goals	OUD/SUD Amendment Goals
To increase access to care	<ul style="list-style-type: none"> • Increase rates of identification, initiation, and engagement in treatment
	<ul style="list-style-type: none"> • Improve access to care for physical health conditions among beneficiaries
To improve the quality of care	<ul style="list-style-type: none"> • Increase adherence to and retention in treatment
	<ul style="list-style-type: none"> • Reduce overdose deaths, particularly those due to opioids
To contain health care cost	<ul style="list-style-type: none"> • Reduce utilization of emergency departments and inpatient hospital settings for treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services
To eliminate institutional bias	<ul style="list-style-type: none"> • Reduce readmissions to the same or higher level of care where the readmission is preventable or medically inappropriate

Milestones

Vermont has initiated programs or met many of the milestones identified by CMS through innovation under the Medicaid State Plan and the Global Commitment to Health Demonstration, however, the State intends to enhance its efforts to include new initiatives and delivery system reforms. Specifically, new initiatives under development include:

- Implementation of value-based purchasing in alignment with the All-Payer Model Agreement to support access.
- Development of a centralized triage, intake, and call center for persons seeking OUD/SUD services.
- Improvement of discharge planning and transitions between care settings.

1. Access to Critical Levels of Care for OUD and Other SUDs

Vermont's OUD/SUD system follows the ASAM Level of Care guidelines and consists of the full spectrum of services, as outlined in Exhibit B beginning below. All OUD/SUD providers must be licensed and enrolled Medicaid Providers, including meeting additional State certification standards for OUD/SUD treatment.

Exhibit B – ASAM Treatment Levels, Providers and Medicaid Availability

ASAM Level of Care	Brief Description	Provider	Existing Medicaid Service (Y/N)
0.5 Early Intervention	<ul style="list-style-type: none"> • Screening, Brief Intervention and Referral for Treatment (SBIRT) 	ER, PCP, Health Clinics, Student Health Center	Y
1 Outpatient Services	<ul style="list-style-type: none"> • Adult: Less than 9 hours of services per week • Youth: Less than 6 hours of services per week • Individual, Family, and Group Counseling Case Management 	Outpatient Clinics	Y
2.1 Intensive Outpatient Services	<ul style="list-style-type: none"> • Adult: 9 or more hours of services per week • Youth: 6 or more hours of services per week to treat multi-dimensional instability • Bundled rate includes case management 	Outpatient Clinics	Y
2.5 Partial Hospitalization Day Treatment Psychosocial Rehabilitation Services	<ul style="list-style-type: none"> • 20 hours or more per week • Clinically intensive programming • Direct access to psychiatric, medical and lab services 	Outpatient Clinics	Y (co-occurring only, MH diagnosis)

ASAM Level of Care	Brief Description	Provider	Existing Medicaid Service (Y/N)
3.1 Clinically Managed Low- Intensity Residential Services	<ul style="list-style-type: none"> • 24-hour structure, at least 5 hours of clinical service/week 	Residential Providers	Y
3.3 Clinically Managed Population- Specific, High- Intensity Residential Services	<ul style="list-style-type: none"> • 24-hour structure, high-intensity clinical services • Less intense milieu • Group treatment for those with cognitive or other impairments 	Residential Providers (IMD)	Pending Continued 1115 Authority
3.5 Clinically Managed High- Intensity Residential Services	<ul style="list-style-type: none"> • 24-hour care, high-intensity services for persons who cannot be treated in less intensive levels • To stabilize multi-dimensional needs and/or safety issues 	Residential Providers (IMD)	Pending Continued 1115 Authority
3.7 Medically Monitored Intensive Inpatient Services	<ul style="list-style-type: none"> • 24-hour nursing care with physician availability for significant problems in Dimensions 1, 2 or 3 • 16 hour/day counselor availability 	Residential Providers (IMD)	Y
4 Medically Managed Intensive Inpatient	<ul style="list-style-type: none"> • 24-hour nursing care and daily physician care for severe unstable problems in Dimensions 1, 2 or 3 • Counseling available to engage patient in treatment (detox only) 	Psychiatric Hospital (IMD)	Pending Continued 1115 Authority
Opioid Treatment Program	<ul style="list-style-type: none"> • Daily or several times weekly opioid agonist medication and counseling to maintain multidimensional stability for those with severe opioid use 	Specialized Health Homes (Hub & Spoke)	Y
Withdrawal Management (WM)	<ul style="list-style-type: none"> • Levels 1 – 4 	Specialized Health Homes (Hub & Spoke), Hospitals, Residential providers (IMD)	Y, Pending Continued 1115 Authority for Higher Levels

Level of Care: 0.5 Early Intervention

Current State :

Screening Brief Intervention and Referral for Treatment: Vermont is in year five of a SAMHSA grant to promulgate Screening, Brief Intervention and Referral for Treatment (SBIRT) throughout Vermont. SBIRT services are intended to identify individuals with risky alcohol and drug behavior and provide a brief intervention or a referral to treatment, if necessary. Throughout the life of the grant, SBIRT has provided services to emergency rooms, free health clinics, primary care offices and a student health clinic across the State. ADAP is working with providers and other State partners to sustain and expand the availability of SBIRT services under the Global Commitment to Health Demonstration.

Public Inebriate/Crisis Intervention: The Public Inebriate (PI) Program is a crisis intervention program for individuals under the influence. The Vermont Public Inebriate Program screens and determines appropriate placement for individuals meeting criteria for incapacitation, due to either intoxication or withdrawal from alcohol or other drugs. Presently there is screening capacity in all counties with one provider covering two counties. In addition to this screening capacity, there are 19-20 “diversion” beds located in several areas across the state designed as alternatives to confined placements. ADAP continues to work to assure a safe and effective response to address the need for additional community inebriate services and coordinated community-level collaborations between public inebriate programs, emergency departments, law enforcement and the Department of Corrections.

Future State:

No changes are expected at this ASAM level of care.

Summary of Actions Needed:

- None

Level of Care: 1.0 Outpatient Services

Current State :

Outpatient Treatment: Medicaid-enrolled providers currently provide outpatient services to Vermonters throughout each region of the State. Outpatient programs include individual, group and family counseling and provide services specific to elders, adolescents, youth, men and women.

Future State:

No changes are expected at this ASAM level of care.

Summary of Actions Needed:

- None

Level of Care: 2.1 Intensive Outpatient Services

Current State :

Attachment N

Intensive Outpatient Treatment: ADAP-Certified, Medicaid-enrolled providers offer intensive outpatient (IOP) services to Vermonters throughout each region the State. IOP programs offer nine to 19 hours of treatment activities per week. These activities consist of a combination of case management, individual, group, and/or family therapy sessions.

Future State:

No changes are expected at this ASAM level of care.

Summary of Actions Needed:

- None

Level of Care: 2.5 Partial Hospitalization

Current State:

Partial Hospitalization: Partial hospitalization is provided to individuals with co-occurring mental health and substance use disorder diagnoses, with the primary diagnosis being mental health.

Future State:

No changes are expected at this ASAM level of care.

Summary of Actions Needed:

- None

Level of Care: 3.1 Clinically Managed Low-Intensity Residential Services

Current State:

Clinically Managed Low-Intensity Residential Care: Vermont funds a 10-bed, low-intensity 3.1 ASAM level residential program in the central part of the state. This program is a step down from a 3.5 ASAM-level program in the same county. Individuals with higher needs can attend the treatment programming and receive MAT at the 3.5-level program. Transportation is provided to individuals between the two facilities.

Future State:

No changes are expected at this ASAM level of care.

Summary of Actions Needed:

- None

Level of Care: 3.3 Clinically Managed, Population-Specific High-Intensity Residential Services

Level of Care: 3.5 Clinically Managed, High-Intensity Residential Services

Current State :

Clinically Managed, High-Intensity Residential Care: Vermont supports several residential programs to provide clinically managed, high-intensity residential services as well as withdrawal management services. This includes women-only, co-ed and specialized programs for adolescents and one for pregnant women and mothers with children under the age of five. These programs have access to psychiatric and mental health professionals for consultation and can provide care for individuals with co-occurring needs. All of Vermont's residential programs are required to provide access to medication-assisted treatment (MAT) services as clinically necessary.

Future State :

No changes are expected at this ASAM level of care.

Summary of Actions Needed:

- None

Level of Care: 3.7 Medically Monitored Intensive Inpatient Services

Current State :

Medically Monitored Intensive Inpatient Care: Vermont offers residential programming for adults that provides medically monitored intensive inpatient services. This program has on-site psychiatric services and provides care to individuals with a wide range of co-occurring conditions, including MAT.

Future State :

No changes are expected at this ASAM level of care.

Summary of Actions Needed:

- None

Level of Care: 4.0 Medically Managed Intensive Inpatient

Current State :

Medically Managed Intensive Inpatient Care: Vermont funds inpatient services at a specialized psychiatric facility for detoxification. This program is also available to treat persons with co-occurring mental health and psychiatric conditions. Once an individual has completed the detoxification they are transferred to an appropriate level of care, typically a community residential program or Specialized Health Home (Hub).

Future State :

Attachment N

No changes are expected at this ASAM level of care.

Summary of Actions Needed:

- None

Level of Care: Opiate Treatment Program

Current State :

Opioid Treatment (Hub and Spoke Program): Vermont developed the first-in-the-nation Specialized Health Home focused on expanding evidence-based MAT for OUD, known as the Hub and Spoke Program. Vermont’s Hub and Spoke Program has garnered national attention for its effective, responsive, and comprehensive approach to providing MAT. Vermont accomplishes this through the integration of opioid treatment programs (OTPs), providing higher levels of care (Hubs) with primary care, obstetrics-gynecology, outpatient addiction treatment, and pain management practices (spokes) providing office-based opioid treatment (OBOTs). Regional Hubs offer medication, counseling, case management and health home services to complex patients. Spokes provide care to individuals who have less complex needs and they provide medication, counseling, case management and health home services.

Hubs offer medication, counseling, case management, and health home services to complex patients. Spokes provide care to individuals who have either been stabilized at a Regional Hub or whose needs do not require the intensity of services offered by the Regional Hubs. Spoke staff, supported by enhanced care coordination through the Blueprint for Health Community Health Teams and local Recovery Support services, assure essential clinical and counseling support services are provided.

Vermont uses a 21-item checklist (Treatment Needs Questionnaire) to help determine whether a Hub or Spoke setting would be most appropriate for new beneficiaries seeking MAT. In order to determine the need for additional hub and/or spoke services, ADAP, in partnership with the Department of Vermont Health Access (DVHA), monitors the regional utilization of Hub services of Medicaid eligible individuals utilizing the Medicaid transportation benefit as well as capacity and wait time reports from Hubs.

Future State :

No changes are expected at this ASAM level of care.

Summary of Actions Needed

- None

Level of Care: Withdrawal Management

Current State :

Withdrawal Management: Withdrawal management is available at several settings throughout Vermont

Attachment N

depending on the medical needs of the individual. ADAP certifies two residential programs in three locations and a social detoxification program to provide higher-intensity withdrawal management services. In addition, hospitals throughout Vermont provide withdrawal management services for individuals who need the full services of a hospital. For individuals whose needs are less intense, withdrawal management services are available through the Hub and Spoke system, which includes health home services.

Future State:

No changes are expected at this ASAM level of care.

Summary of Actions Needed:

- None

Recovery Support Services

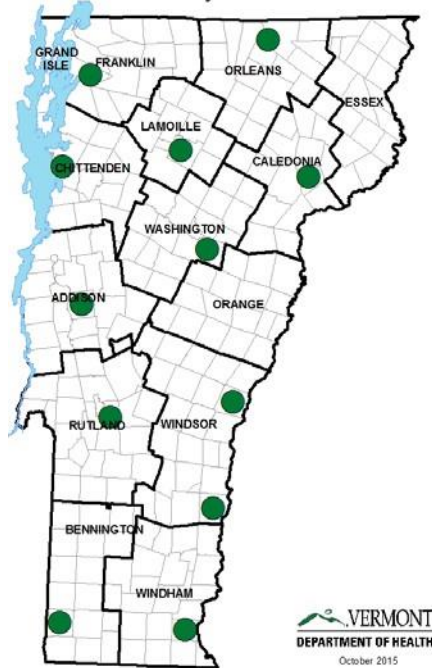
Recovery Support services in Vermont focus on the following: helping people find, maintain, and enhance their recovery experience through peer support, sober recreation, and educational opportunities. This includes both 12 Recovery Centers located throughout Vermont and the centralized Vermont Recovery Network.

Recovery Centers provide non-clinical services that assist with establishing community connections that lead to employment, housing, and other social supports in a safe, drug- and alcohol-free environment. Recovery Centers are committed to supporting a person's efforts in preventing relapse and, should relapse occur, in quickly returning to recovery. Individual services revolve around the support from the Peer Recovery Coach, an individual in active recovery from substance use disorder who has received Peer Recovery Coach training. The Recovery Centers also offer several groups to support recovery, such as:

- Evidence-Based Practice (EBP) groups
 - Making Recovery Easier
 - Seeking Safety
 - Wellness Recovery Action Planning (WRAP)
- Community Groups
 - Yoga, Meditation, Acupuncture
 - Age-specific recovery groups
 - Ongoing 12 Step meetings

Exhibit C – Recovery Center Locations (2015)

Attachment N



Recovery Housing

Recovery Housing is provided to Vermonters through several transitional housing providers, some connected to a Recovery Center and some independent organizations. ADAP has recently begun a new partnership with the Vermont Foundations of Recovery to add new sober transitional housing beds. These programs offer supports to connect individuals to appropriate community social services and ongoing treatment and recovery resources such as individualized planning and general case management.

2. Use of Evidence-Based SUD-Specific Patient Placement Criteria

Patient Assessment

Current State :

Vermont relies on evidence-based practices and clinical practice guidelines for all aspects of provider development, treatment authorization and recovery. The need for treatment often starts with a screening at one of the specialized providers, community partners, or primary care practices. Vermont promotes integrated screening for co-occurring substance use disorders and for co-occurring mental health issues.

All of Vermont's certified OUD/SUD providers (Preferred Providers) are required to use evidence-based screening tools, perform a comprehensive assessment which includes elements specified by the State, and utilize ASAM criteria to determine level of care. All State requirements are outlined in *Vermont's Preferred Provider Substance Use Disorder Treatment Standards*. All Preferred Providers have grant agreements with the State outlining their expectations including compliance with the *Preferred Provider Substance Use Disorder Treatment Standards* (Standards). Assessments include age appropriate elements, such as, but not limited to: mental health status; OUD/SUD history; physical health status; medications; allergies; living arrangements; family and interpersonal history; social

Attachment N

support needs; criminal justice involvement; school history; cultural and spiritual preferences; trauma history; participant strengths, goals and priorities; caregiver status; education; and employment. The Standards require that the assessment process results in a written and dated document that includes diagnosis, co-occurring disorders, treatment recommendations, and the risk ratings across the ASAM Criteria.

For Preferred Providers to maintain specialty OUD/SUD provider certification in Vermont, they must pass compliance and quality audits conducted by ADAP. These audits are performed every one to three years on all Preferred Providers and are focused on compliance with standardized screening tools, comprehensive assessments, ASAM Levels of Care and evidence-based treatment standards which are verified through client record reviews and agency documentation. The period between audits is determined by the audit results.

Vermont inpatient detoxification and residential levels of care are designated as short-term acute care for the purpose of stabilizing an individual, so they can successfully transition to clinically appropriate lower levels of care.

ADAP has organized its oversight and management of the Preferred Providers into regions of the State where an individual on the Clinical Services Team is responsible for oversight of all of the Preferred Providers, including residential levels of care, in each region. These individuals, known as Regional Managers, participate in the provider certification process with the compliance team and are included in the compliance and quality audits.

The Regional Managers also provide oversight and technical assistance throughout each certification period, between audits, with at least yearly on-site visits and ongoing communication regarding the areas of opportunity identified by audits as well as Statewide and regionally identified areas for performance or practice improvement.

Future State:

ADAP has developed a new scoring tool to determine a Preferred Provider’s compliance and certification status. The Compliance Assessment Tool (Tool) is a weighted scoring tool to align with the Preferred Provider Standards. The Tool includes separate sections according to the program’s ASAM Level of Care and is currently being piloted, with one provider audit completed using the Tool. Accompanying this Tool will be a compliance guide which will outline the scoring of the Tool. The score will determine the provider’s compliance status (“full” or “provisional”) and will help inform the length of the time before the subsequent review. The implementation of this Tool is more transparent and objective than the auditing process used in the past, which was subject to error and bias, and was not flexible to address the ASAM Levels of Care.

Summary of Actions Needed:

The Standards are under internal review and will be finalized by the ADAP Quality Unit for implementation by May 1, 2018. ADAP’s Clinical Unit and Quality Unit will certify four residential providers using the Compliance Assessment Tool through January 2019.

Action	Date	Responsible
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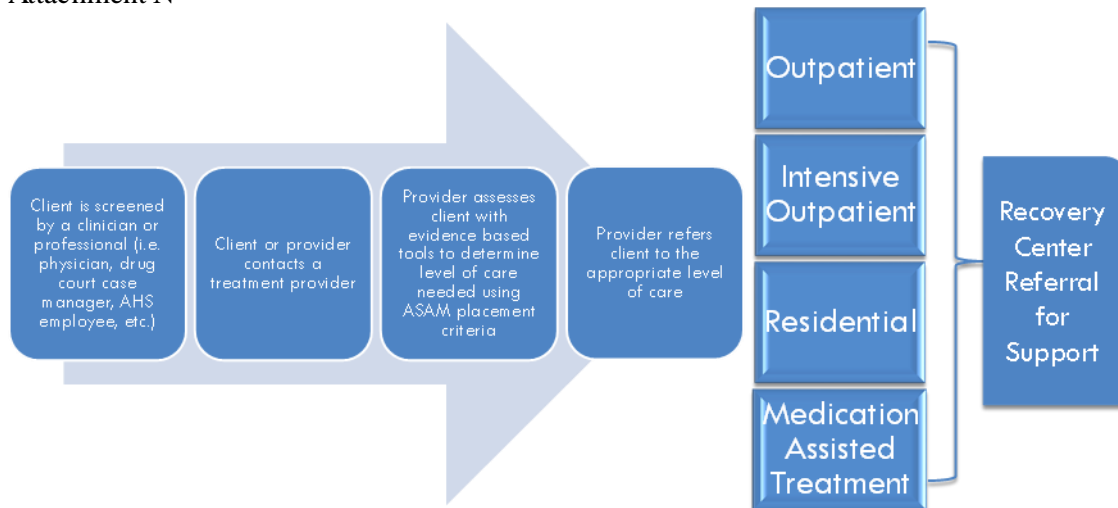
Attachment N

Finalize Substance Use Disorder Treatment Standards	May 1, 2018	Director of Quality Management and Compliance
Update Compliance Assessment Tool with Revised Substance Use Disorder Treatment Standards and all Residential ASAM Criteria	May 15, 2018	Director of Quality Management and Compliance
Use the Compliance Assessment Tool to Certify ASAM Level 3.5 Level of Care Provider (Valley Vista Vergennes)	June 30, 2018	Director of Clinical Services; Director of Quality Management and Compliance
Use the Compliance Assessment Tool to Certify ASAM Level 3.5 Level of Care Provider (Valley Vista Bradford)	September 30, 2018	Director of Clinical Services; Director of Quality Management and Compliance
Implement the Compliance Assessment Tool with Seven Providers	Monthly - December 2018	Director of Clinical Services; Director of Quality Management and Compliance
Use of the Compliance Assessment Tool to Certify ASAM Level 3.3 Level of Care Provider (Recovery House)	December 2018	Director of Clinical Services; Director of Quality Management and Compliance
Use of the Compliance Assessment Tool to Certify ASAM Level 3.2-WM Level of Care Provider (Act 1/Bridge)	January 31, 2019	Director of Clinical Services; Director of Quality Management and Compliance

Utilization Management

Current State :

Vermont currently ensures that individuals are appropriately placed in residential programs and inpatient detoxification through the process of concurrent review and prior authorization. Residential programs are required to screen and assess appropriateness of admission. All programs utilize the Addiction Severity Index (ASI) multi-dimensional assessment tool. Within 24 hours or next business day of admission the Medicaid Utilization Management (UM) unit is notified. By the end of the fifth day the residential programs send the ASI results and other clinical information to the UM team for concurrent review and authorization. The UM team use the nationally recognized McKesson Interqual® decision support tool to determine continued authorization. Exhibit II-8 provides an overview of Vermont’s process for accessing treatment services.



Future State:

Vermont is developing a value-based payment model for residential programs to align with its All-Payer Model Agreement with CMS. The goal of this value-based design is to incentivize successful transitions of care, improve outcomes, and reduce costs. The value-based payment and enhanced support model is targeted for implementation in 2018.

The value-based payment model Vermont is pursuing is a case rate-like payment methodology. This methodology will reimburse residential care providers a specific per-admission rate for an individual’s care for the entire length of the residential stay, as opposed to a per-day rate, as in the current fee for service per diem, per-person payment model. Paying a per-admission case-like rate instead of a per-day rate will disincentivize residential providers from keeping individuals longer than is clinically appropriate as there is no additional reimbursement based on the increase in number of days the individual is in care.

The new case rate-like methodology will result in a differential case rate such that admissions for individuals with more complex care needs will be reimbursed at a higher rate than an admission for an individual with less complex care needs. The methodology considers a number of clinical and social determinates of health (such as withdrawal potential, medical and mental health co-morbidities) that incentivize providers to admit individuals who most closely match the dimensional criteria for admission to the residential level of care based on the ASAM Criteria (i.e. those with higher care needs). The methodology further disincentivizes the admission of individuals who are less aligned with the dimensional criteria for admission to residential level of care (i.e. those with lesser care needs), thereby helping to ensure only those individuals who clinically need access to residential care are served there.

The methodology will complement the already existing expectations that residential providers utilize the ASAM criteria to determine level of care needs and recommended treatment placement by aligning the reimbursement methodology’s inherent (dis)incentives with the dimensional assessment of ASAM. The providers’ compliance with the utilization of ASAM criteria will be monitored through the compliance and quality audits as well as the ADAP Regional Management Approach described in the next paragraph.

ADAP has organized their oversight and management of the Preferred Providers into regions of the

Attachment N

State where an individual on the Clinical Services Team is responsible for oversight of all the Preferred Providers, including residential levels of care, in each region. These individuals, known as Regional Managers, participate in the provider certification process with the compliance team and are included in the compliance and quality audits and, as a part of this process, complete chart reviews.

Regional Managers also provide oversight and technical assistance throughout each certification period, between audits, with at least yearly on-site visits and ongoing communication regarding the areas of opportunity identified by audits as well as Statewide and regionally identified areas for performance or practice improvement. These Regional Managers will perform periodic chart reviews, outside the audit cycles, to review for and provide any needed technical assistance regarding the clinically appropriate utilization of residential level of care. To further ensure the appropriate utilization of residential care services, the State will explore performance measures such as readmission rates to the same or higher levels of care, initiation and engagement in treatment, and treatment length of stay. These performance metrics will be shared with the providers by the Regional Managers and technical assistance will be provided if indicated.

Summary of Actions Needed:

Vermont is currently working collaboratively with the Payment Reform Team at the Department of Vermont Health Access to develop the case rate-like methodology.

Action	Date	Responsible
Develop the criteria for the differential case rate	Completed April 2018	ADAP Director of Clinical Services
Model the methodology using the identified criteria for the Vermont team to review	April 25, 2018	Payment Reform Team
Work with financial colleagues to finalize budget and rate decisions for the model	May 9, 2018	Payment Reform Team, ADAP Director of Clinical Services, VDH Business Office
Residential providers to provide feedback	May 16, 2018	ADAP Director of Clinical Services
Work with the Medicaid fiscal agent to identify and complete the necessary systems changes required for the Medicaid billing system	October 1, 2018	ADAP Director of Clinical Services, Payment Reform Team, DXC (Fiscal Agent)
Work with the residential providers to provide technical assistance and education around the necessary billing changes	October 1, 2018	ADAP Clinical Team
Regional Managers will partner with the compliance and quality team to determine the appropriate frequency with which the Regional Managers will perform the between audit chart reviews	October 1, 2018	ADAP Clinical Team and ADAP Quality Team

3. Use of Nationally Recognized SUD-specific Program Standards to Set Provider Qualifications for Residential Treatment Facilities

Current State:

Vermont’s new certification process, as indicated above, also includes the certification of residential programs to be designated at an ASAM level of care. Residential providers can receive reimbursement from Vermont Medicaid through grant agreements with the Vermont Department of Health’s Division of Alcohol and Drug Abuse Programs (ADAP). These grant agreements outline the expectations including compliance with the *Preferred Provider Substance Use Disorder Treatment Standards* (Standards). The Standards outline the specific requirements for a provider to receive certification at an ASAM level 3.1, 3.3, 3.5 or 3.7. These requirements include performance expectations, operations (including hours of operations), staffing, human resources, quality improvement, policies and procedures, intensity of services, discharge planning and billing.

Each provider is audited by the State on a regular schedule to ensure compliance with these requirements. The State utilizes an audit tool with a score for each element along with weighted elements. Final scores determine a full certification or limited certification with corrective action plan. The amount of time between audits is determined by the final score.

Future State:

ADAP has developed a new scoring tool to determine a Preferred Provider’s compliance and certification status. The Compliance Assessment Tool (Tool) is a weighted scoring tool to align with the Standards. The Tool includes separate sections according to the program’s ASAM Level of Care and is currently being piloted, with one provider audit completed using the Tool. Accompanying this Tool will be a compliance guide which will outline the scoring of the Tool. The score will determine the provider’s compliance status (“full” or “provisional”) and will help inform the length of the time before the subsequent review. The implementation of this Tool is more transparent and objective than the auditing process used in the past, which was subject to error and bias, and was not flexible to address the ASAM Levels of Care. (Note tabs at bottom of spreadsheet) The Tool will include separate sections according to the program’s ASAM Level of Care.

All of Vermont’s residential programs at ASAM level 3.3 or higher offer medication-assisted treatment (MAT) on site. The current grant agreements, expiring June 30, 2018 do not specifically require the residential programs to offer MAT. The new grant agreements beginning July 1, 2018 will clearly require the residential programs to offer MAT in order to receive certification as a Preferred Provider thus allowing them to be reimbursed by Vermont Medicaid.

Summary of Actions Needed:

The *Preferred Provider Substance Use Disorder Treatment Standards* are under internal review and will be finalized by the ADAP Quality Unit for implementation by May 1, 2018. ADAP’s Clinical Unit and Quality Unit will certify four residential providers using the Compliance Assessment Tool through January 2019.

Action	Date	Responsible
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Attachment N

Finalize Substance Use Disorder Treatment Standards	May 1, 2018	Director of Quality Management and Compliance
Update Compliance Assessment Tool with revised Substance Use Disorder Treatment Standards and all residential ASAM criteria	May 15, 2018	Director of Quality Management and Compliance
Use the Compliance Assessment Tool to certify ASAM Level 3.5 Level of Care provider (Valley Vista Vergennes)	June 30, 2018	Director of Clinical Services; Director of Quality Management and Compliance
Use the Compliance Assessment Tool to certify ASAM Level 3.5 Level of Care provider (Valley Vista Bradford)	September 30, 2018	Director of Clinical Services; Director of Quality Management and Compliance
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Use of the Compliance Assessment Tool to certify ASAM Level 3.2-WM Level of Care Provider (Act 1/Bridge)	January 31, 2019	Director of Clinical Services; Director of Quality Management and Compliance

4. Sufficient Provider Capacity at Critical Levels of Care including for Medication-Assisted Treatment for OUD

Current State :

Vermont adheres to all Medicaid Manage Care requirements regarding network adequacy and access standards. ADAP collaborates with DVHA to use Medicaid utilization data and non-Medicaid services provider encounter data to explore the patterns of utilization for residential care and care at Specialized Health Homes throughout the State.

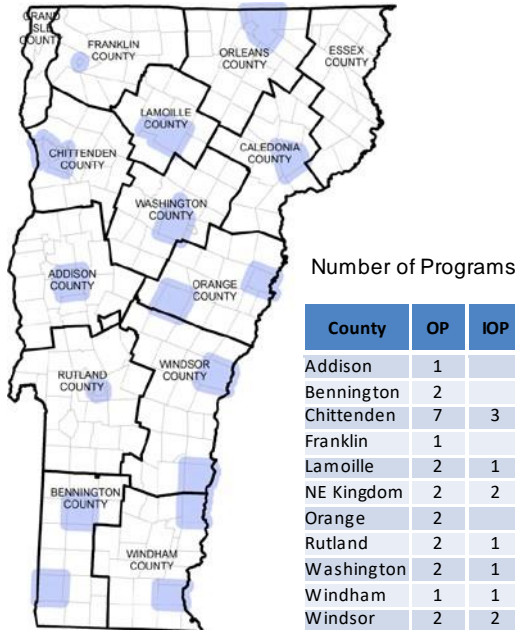
ADAP has several reporting requirements as a part of the granting process with the Preferred Providers in order to monitor and ensure that the State has sufficient provider capacity for critical levels of care, including access to MAT. Specialized Health Homes “Hubs” are required to report within seven days of reaching 90 percent capacity for serving individuals who are intravenous drug users, and provide immediate notice if a pregnant woman is unable to be served. In addition, “Hubs” are required to submit monthly summaries of wait times for service and service requests, and census reports with numbers of individuals at each phase of treatment (induction, stabilization, maintenance) and numbers of individuals who have been transferred to office-based “Spokes”. ADAP collaborates with DVHA on Medicaid medical transportation utilization data (e.g., distance to services) to monitor the need for MAT providers statewide.

Attachment N

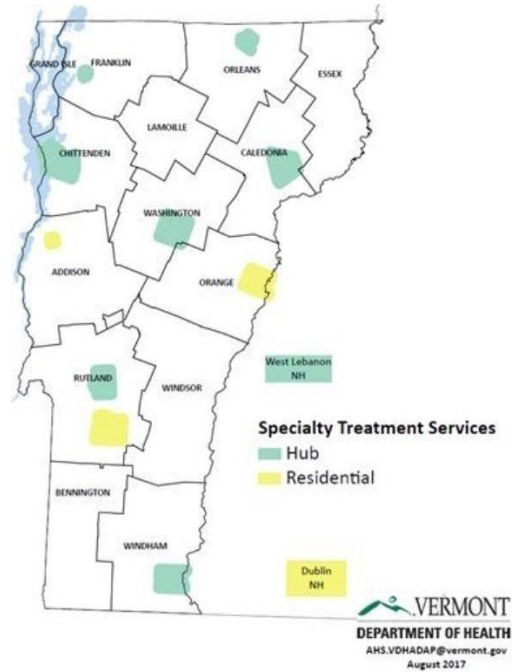
Residential programs are also required to submit monthly summaries of wait times for services and daily information to an electronic bed-board, which tracks utilization of and availability of beds across residential programs statewide.

Occupancy in Vermont’s OUD/SUD residential programs remains under 100 percent, suggesting capacity is at adequate levels. With the addition of a new Specialized Health Home “Hub” in 2017, wait time reports from across the Specialized Health Home “Hubs” demonstrate timely access across the State.

Exhibit J – Maps of Treatment Locations
Outpatient/Intensive Outpatient Facilities



Hub and Residential Facilities



Because all specialty SUD programs are certified by ADAP, Vermont is able to maintain an inventory of the number of providers at all levels of care. To determine adequacy of access, ADAP reviews the monthly wait list reports to identify areas of increasing or sustained long waiting lists. The State team assesses data points on the wait list such as place of residence, distance of travel, length of time on the wait list and any special needs. By using these data points, in the past year Vermont identified the need for an additional Hub in the northern part of the state and successfully opened a new Hub in 2018 resulting in elimination of the wait list for Hub services.

Future State:

Vermont will be enhancing its access and evidence-based placement process in 2018 and beyond. To improve timely access to care and placement at the appropriate level of care, the State is in the process of developing a Centralized Intake and Call Center (Center) for all Vermonters. The Center is under development and start-up is funded through the Opioid State’s Targeted Response (STR) SAMHSA grant. The Center will perform an initial screening of individuals to determine the most appropriate referral. The Center will have current information on provider availability and be able to schedule appointment times, across all levels of care, for comprehensive assessments. Individuals having longer

Attachment N

wait times will receive regular calls from the center to maintain engagement and facilitate initiation into treatment.

The Center will maintain data on access to care and manage wait lists for services. The Center will determine availability of treatment at each level of care as well as availability of MAT and medically supervised withdrawal management throughout the state. The Center will provide monthly reports to the State with data elements that will allow the State to monitor access to care and to identify the largest areas of need. The Center will be self-collecting the data within their own system.

Summary of Actions Needed:

The below activities are the responsibility of the ADAP Division within the Department of Health.

Action	Date
CALL CENTER RFP ISSUE DATE	March 30, 2018
BIDDERS CONFERENCE	April 9, 2018– 1:00PM EST – 2:00PM EST
QUESTIONS DUE	April 13, 2018 – 3:00PM EST
RFP RESPONSES DUE BY	April 30, 2018 – 3:00PM EST
FINALIST DEMONSTRATIONS	Week of May 21, 2018
SELECTION NOTIFICATION	On or before June 15, 2018
INDEPENDENT REVIEW Following the selection of a proposal for contract award, the selected proposal will be the subject of an independent review before a contract can be completed. The time required for this process is approximately ten weeks.	To be completed on or before August 24, 2018
ANTICIPATED PROJECT START DATE	October 1, 2018
Anticipated Go-Live	On or before 4/1/2019

The State is in the process of hiring an IT Project Manager and Substance Abuse Program Manager who will be the primary managers of the program and the contract(s).

5. Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and OUD

Current State:

Through the Medicaid State Plan and the Global Commitment to Health Demonstration, Vermont has developed a continuum of services and supports that provide the foundation to successfully address opioid and other substance use disorders in Vermont.

Vermont’s efforts to expand treatment for Vermonters with OUD are broad-based and benefit enormously from the commitment of community leaders, partners, and members to support and speak about the importance of this issue. The dedication and commitment of these individuals has resulted in increased treatment capacity in critically needed areas, increased coordination amongst community partners, and focus on treating the factors that contribute to the complexity of OUD.

- Opioid Prescribing Guidelines

Vermont implemented “Rules Governing the Prescribing of Opioids for Pain” effective July 1, 2017 (see Opioid Prescribing Rule). This rule provides legal requirements for the appropriate use of opioids in treating pain to minimize opportunities for misuse, abuse, and diversion, and optimize prevention of addiction and overdose and is consistent with CDC guidelines.

- Expanded Coverage of, and Access to, Naloxone for Overdose Reversal

Vermont began distribution of Naloxone with a pilot in 2013 and has since expanded Statewide. Naloxone is provided free of charge at 27 distribution sites including syringe services programs, substance use treatment providers, recovery centers, and medical facilities. Naloxone is available to persons taking opioids, family members, and other community members who may come in contact with people at risk for overdose. In 2016, pursuant to legislation, all Vermont EMS agencies receive naloxone at no charge. Emergency use kits also are offered to individuals being released from a correctional facility who have identified previous opioid use or dependency.

In August 2016, the Commissioner of Health issued a standing order for naloxone, allowing any pharmacy to dispense the lifesaving drug and bill medical insurance, if available. New prescribing rules effective July 1, 2017 require an accompanying naloxone prescription for opioid prescriptions >90 MME, as well as when there are concurrent benzodiazepines prescriptions.

- Implementation of Strategies to Increase Utilization and Improve Functionality of Prescription Drug Monitoring Programs

The rules implemented July 1, 2017 require that prescribers query the Vermont Prescription Drug Monitoring System (VPMS) prior to the first prescription of an extended release hydrocodone or oxycodone that is not an Abuse-deterrent Opioid; no less frequently than once every 120 days for any patient prescribed 40 mg or greater of hydrocodone or 30 mg or greater of oxycodone per day of an extended release hydrocodone or oxycodone that is not an Abuse-deterrent Opioid as long as the patient possesses a valid prescription for that amount; and no less frequently than as described in the Vermont Prescription Monitoring System rule (see VPMS rule).

All prescribers and pharmacists dispensing Schedule II-IV drugs must register and use the VPMS. Vermont also has been improving functionality of the VPMS through the development of Prescriber Insight Reports, which compare a prescriber’s opioid prescribing patterns to similar prescribers and Clinical Alerts to notify prescribers when patients’ prescription history may be of concern. There has been extensive outreach, technical assistance, and training for prescribers on opioid prescribing and the use of the VPMS.

Vermont Medicaid has several strategies to address the opioid epidemic through the clinical management of opioids and drugs used to treat substance use disorder. DVHA employs prior authorization, quantity limits, days’ supply limits, and maximum dosages to reduce inappropriate use of these drugs.

Management of Short-Acting Opiates

Vermont Medicaid has implemented prescription limits for opiates used in treating acute pain to align

Attachment N

with rule changes made by the Vermont Department of Health effective July 5, 2017. Initial prescriptions for opioids for patients 18 years of age and older are limited to 50 Morphine Milligram Equivalents (MME) per day and a maximum of 7 days' supply. Patients 17 years of age and younger are limited to 24 MME per day and a maximum of 3 days' supply. The prescription limits apply only to the first prescription filled in an outpatient setting for a given course of treatment and do not apply to renewals or refills. The limits do not apply to long-acting opioids, as they are not indicated for acute pain. Supply limits can be exceeded with prior authorization. Limits are enforced at point of sale. If no prior opiate prescription is found in the member profile within the past 45 days, the claim will reject if MME or days' supply is exceeded.

Management of Long-Acting (LA) Opioids

Vermont Medicaid requires prior authorization for most long-acting (LA) opioids. Prescribers are notified on Medicaid's Preferred Drug List (PDL) of precautions around prescribing LA opioids. The following statements appear in Medicaid's PDL: *“Long-acting opioid dosage forms are intended for use in opioid-tolerant patients only. These tablet/capsule/topical medications may cause fatal respiratory depression when administered to patients not previously exposed to opioids. LA opioids should be prescribed for patients with a diagnosis or condition that requires a continuous, around-the-clock analgesic. LA opioids should be reserved for use in patients for whom alternative treatment options (such as non-opioid analgesics or immediate-release opioids) are ineffective, not tolerated, or would be otherwise inadequate to provide sufficient management of pain. LA opioids are NOT intended for use as 'prn' analgesic. LA opioids are NOT indicated for pain in the immediate post-operative period (the first 12-24 hours following surgery) or if the pain is mild, or not expected to persist for an extended period. LA opioids are not intended to be used in a dosage frequency other than FDA approved regimens. Patients should not be using other extended release opioids prescribed by another physician. Prescribers must consult the VPMS (Vermont Prescription Monitoring System) to review a patient's Schedule II - IV medication use before prescribing long-acting opioids.”*

Drug-specific criteria is applied to prior authorization requests. In addition, DVHA has applied system edits for quantity limits and maximum dosages.

Abuse-Deterrent Formulations (ADF)

Medicaid covers one long-acting, abuse-deterrent opiate formulation on its PDL without prior authorization. Currently, this formulation is Embeda (morphine sulfate/naltrexone) and is limited to two tablets per day. DVHA continues to monitor the clinical and cost benefits of covering additional ADFs.

Management of Drugs used to Treat Substance Use Disorder (SUD)

Medicaid covers all buprenorphine-containing drugs and naltrexone to treat opiate dependency. Vermont Medicaid manages outpatient Suboxone and buprenorphine utilization to ensure these highly utilized, high-cost medications are used appropriately. All buprenorphine and Suboxone products require prior authorization and have quantity and dose limits. All patients receiving buprenorphine and Suboxone products must have one “pharmacy home” for all prescriptions. Oral naltrexone is available without restriction, and injectable naltrexone is available with a diagnosis of SUD and if oral tolerability of naltrexone has been established. In addition to methadone, Medicaid also covers buprenorphine products for use in our OTP programs.

Retrospective Drug Utilization Review

Medicaid routinely performs retrospective DUR regarding controlled-substance topics such as methadone use, Long-Acting Stimulant Use, etc. In these initiatives, both medical and pharmacy data is used to identify trends. An upcoming initiative will analyze buprenorphine use with benzodiazepines and/or opiates.

Overdose Prevention

Medicaid has developed a statewide opioid antagonist pilot program that emphasizes access to opioid antagonists to and for the benefit of individuals with a history of opioid use. Along with the pilot program, a policy was generated for “Standing Order for Distribution of Naloxone Prescription for Overdose Prevention” which allows Naloxone Hydrochloride (Narcan®) to be covered without a prescription. This policy can be found at:

<http://www.vtpharmacists.com/resources/RESPNaloxonestandingorder.pdf>

This policy is in accordance to Standing Order issued pursuant to 18 V.S.A. § 4240 (c) (1) and ensures that residents of the State of Vermont who are at risk of opioid-related overdose, along with other persons such as family members and friends, can obtain Naloxone without a prescription. The statute can be found at: <http://legislature.vermont.gov/statutes/section/18/084/04240>.

In support of this program and the standing order, Medicaid has available two Naloxone products preferred on the Preferred Drug List (PDL) without any prior authorization requirement:

- Narcan® (naloxone HCL) Nasal Spray with a quantity limit of 4 single-use sprays every 28 days.
- Naloxone HCL Prefilled luer-locked needled syringe plus intranasal mucosal atomizing device

Future State:

Vermont currently has two provider and stakeholder groups through which the Vermont Department of Health (VDH) receives feedback and recommendations. These groups are the Controlled Substances and Pain Management Advisory Council and the Prescription Drug Overdose Prevention Stakeholder Workgroup. VDH utilizes these groups to receive feedback on the Prescribing Rules and identify any changes that may be needed. Vermont is currently in process of finalizing updates to the Rule based on feedback from stakeholders. The ADAP Policy Director’s responsibility is to keep current on changes at the national level related to the field of SUD. The Policy Director will identify areas that may impact the prescribing rules and work with the VDH Senior Policy and Legal Advisor to make changes to Vermont’s rules when necessary.

On January 5, 2017 Vermont’s Governor Phil Scott created the position of Director of Drug Prevention Policy and the Vermont Opioid Coordination Council in his second Executive Order. In the executive order, Governor Scott charged the Council “to lead and strengthen Vermont’s response to the opiate crisis by ensuring full interagency and intra-agency coordination between state and local governments in the areas of prevention, treatment, recovery and law enforcement activities.” The Council’s first meeting was on May 8, 2017.

The Council’s first report to Governor Scott includes 22 recommendations for next steps to continue

Attachment N

Vermont's progress in addressing the opioid crisis. These recommendations are designed to empower local communities, align the delivery of services within state government, and between government and private services, to ensure effective results in:

- **Prevention:** Addressing the drivers of demand for opioids, including prescribing practices, education at all levels, and social and community engagement.
- **Treatment:** Ensuring timely, affordable and effective treatment is available to all in need.
- **Recovery:** Making recovery from addiction sustainable through support systems, with emphasis on employment, housing, social supports, and engagement.
- **Law Enforcement:** Reducing supply through investigation and prosecution; policy changes to address the rising presence of fentanyl, and continued work against the diversion of prescription opioids.

The following list includes all recommendations:

- A. Implement a statewide comprehensive system to deliver school-based primary prevention programs.
- B. Expand health care education, monitoring and screening for providers and patients, including provider participation in the *Vermont Prescription Monitoring System (VPMS)*; *provider training, and patient education*, in alternatives to opioids for pain management including *non-pharmacological options*; and expansion of *Screening, Brief Intervention and Referral to Treatment (SBIRT)* in primary care, emergency departments, corrections and schools.
- C. Build, replicate and support strong community-based models through multi-sector partnerships, innovation, and research resulting in outcomes that exceed previous, less collaborative efforts.
- D. Create a comprehensive drug prevention messaging campaign designed to raise public awareness, reduce stigma, provide hope for families, and strengthen resilience in Vermont's communities.

Intervention

- E. Expand Vermont's syringe exchange programs and services to increase geographic reach and hours of operation. Support access to increased case management services for all participants.
- F. Supply naloxone and provide training to all Vermont law enforcement, emergency medical services (EMS) and people likely to be near a person who may overdose.

Harm Reduction

- G. Expand drug disposal options and events, and increase public participation across the state.
- H. Improve sharps collection and disposal with a statewide strategy and community toolkit.

Treatment: These strategies build on Vermont's nationally recognized treatment system and call for assessment and new strategies to make treatment and recovery possible for more Vermonters.

- A. Support, evaluate and improve Vermont's Hub and Spoke system for opioid treatment to sustain, and expand where needed, Hub and Spoke treatment services across the state.
- B. Expand access to medication-assisted treatment (MAT) in all Vermont correctional facilities.
- C. Maximize the use of non-pharmacological approaches (integrative health care professions) for pain management, and for addiction treatment and recovery.

Attachment N

- D. Support the Vermont Judiciary’s plan to explore expanded access to treatment docket techniques.
- E. Support efforts to expand Medicare and Medicaid coverage for opioid treatment.

Recovery: Vermont’s investment in delivering treatment must be reinforced with strong recovery strategies that help Vermonters sustain their recovery. Housing, employment, health care and social supports are essential.

- A. Ensure Vermont has a strong statewide network of recovery centers, recovery coaches, and supports.
- B. Expand the availability of and equal access to recovery housing; explore expansion of the Department for Children and Families’ (DCF) Family Supportive Housing Program to ensure individuals and families throughout Vermont have access to a stable home environment.
- C. Expand Employment in Recovery. (See “Overarching/Systemic.”)

Enforcement: Enforcement strategies focus on keeping Vermont’s roadways safe, interrupting drug trafficking, and ensuring Vermont’s law enforcement and first responders have training they need.

- A. Support research and development of an accurate, cost-effective roadside drugged driving test.
- B. Increase Vermont’s resources for drug trafficking investigations.
- C. Provide drug recognition training for law enforcement and first responders and increase the number of drug recognition experts (DREs).

6. Improved Care Coordination and Transitions between Levels of Care

Current State :

ADAP continues to improve coordination between the Hub and Spoke providers and specialty substance use disorder treatment providers (residential) through referral protocols, care coordination, covered benefits, information sharing, etc. These and other collaborations are contributing to stronger relationships between primary care practices and specialty substance use disorder service providers, leading to more effective recovery management of physical and behavioral health services.

Through Vermont’s health reform initiatives, physicians are educated and trained on enhancing their own screening and referral services, so that more clients are screened and directed to OUD/SUD specialists from primary care practices.

Vermont’s *Preferred Provider Substance Use Disorder Treatment Standards* (Standards) include discharge planning expectations for all levels of care. Aftercare planning starts as early as possible in the person-centered treatment planning and service delivery process. The aftercare plan is to ensure a seamless transition when a person served is transferred to another level of care or prepares for a planned discharge to recovery support.

The aftercare plan identifies the person’s need for a recovery support system or other types of service that will assist in continuing the recovery and community integration. The plan also includes referral information made for additional services such as appointment dates, times, contact name, telephone number, and location. The referring provider must provide the receiving provider with the most recent assessment upon receipt of a signed release of information. Upon discharge, the provider, when

Attachment N

prescribing medications, will document coordination of care with the primary care provider and/or external prescribing professional regarding, at a minimum, what medications are being prescribed and for what diagnoses. These standards are audited during the annual site review through the medical record audit. Should any provider be out of compliance with these standards, a corrective action plan will be required. State staff also are available to provide technical assistance to the provider on improving in this area. With the development of the Centralized Intake and Call Center in 2018, providers will have enhanced support for ensuring continuity of care during transitions.

Future State:

Recovery Coach in the Emergency Department (ED)

Utilizing funding through the Opioid State’s Targeted Response (STR) SAMHSA grant to cover start-up costs, Vermont is implementing a Recovery Coach in the Emergency Department (ED) program modeled after Rhode Island’s Anchor ED program. This program is currently being implemented in three counties and expanding to two additional counties in 2018.

Vermont’s Recovery Coach in the Emergency Department (ED) initiative connects individuals presenting in the ED or other parts of the hospital with peer-to-peer support provided by Recovery Coaches. Recovery Coaches are on-call to the ED 24 hours a day, 7 days a week. The purpose of the interaction is for the Recovery Coaches to offer support, guidance and information on topics such as overdose, treatment and recovery, to both the individual and their family/support system. The Recovery Coach will assist in connecting the individual to treatment and other community resources, in securing transportation and other supports in order for the individual to engage in SUD treatment as well as necessary medical appointments, and to assist in navigating the system of care. The connection initiated in the ED is supplemented by extensive post-ED follow-up by Recovery Coaches such as in-person meetings and phone calls.

Centralized Intake and Call Center

Vermont will be enhancing its access and evidence-based placement process in 2018 and beyond. To improve timely access to care (including transitions of care), and placement at the appropriate level of care, the State is in the process of developing a Centralized Intake and Call Center for all Vermonters. The Center is under development and start-up is funded through the Opioid State’s Targeted Response (STR) SAMHSA grant. The Center will perform an initial screening of individuals to determine the most appropriate referral. The Center will have current information on provider availability and be able to schedule appointments times, across all levels of care, for comprehensive assessments. Individuals having longer wait times will receive regular calls from the center to maintain engagement and facilitate initiation into treatment. The Center will also be the mechanism for providers to access appointments for individuals transitioning between levels of care. The Center staff will contact individuals who have discharged to remind them of their follow-up appointments and make regular contact with individuals who are waiting for services. The Center staff will ensure individuals have information on community supports and other resources such as recovery centers and will assist individuals in making those contacts.

Summary of Actions Needed:

Recovery Coach in the Emergency Department (ED)

Action	Date	Responsible
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Attachment N

Executed memorandums of understanding (MOUs) with each of the recovery centers defining roles and responsibilities are in place.	Completed	Project Manager
Recovery centers are in the process of developing MOUs with the hospitals to define roles and responsibilities.	June 1, 2018	Recovery Center, Hospitals, Project Manager
Once the MOUs are executed with the hospitals, recovery coaches will begin formal deployment.	June 1, 2018	Recovery Centers
All three recovery centers are staffed and initial training has been conducted, including the first phase of ED-specific training.	June 1, 2018	Recovery Centers and Project Manager

Centralized Intake and Call Center

The below activities are the responsibility of the ADAP Division within the Department of Health.

Action	Date
CALL CENTER RFP ISSUE DATE	March 30, 2018
BIDDERS CONFERENCE	April 9, 2018 – 1:00PM EST – 2:00PM EST
QUESTIONS DUE	April 13, 2018 – 3:00PM EST
RFP RESPONSES DUE BY	April 30, 2018 – 3:00PM EST
FINALIST DEMONSTRATIONS	Week of May 21, 2018
SELECTION NOTIFICATION	On or before June 15, 2018
INDEPENDENT REVIEW Following the selection of a proposal for contract award, the selected proposal will be the subject of an independent review before a contract can be completed. The time required for this process is approximately ten weeks.	To be completed on or before August 24, 2018
ANTICIPATED PROJECT START DATE	October 1, 2018
Anticipated Go-Live	On or before 4/1/2019

Section II – Implementation Administration

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Section III – Relevant Documents

1. Preferred Providers: Substance Use Disorder Treatment Standards

2. Preferred Providers Compliance Assessment Tool

Attachment A – Template for SUD Health Information Technology (IT) Plan

Vermont's PDMP, known as the Vermont Prescription Monitoring System (VPMS), was implemented as a result of legislation passed in 2006 with data collection beginning in 2009. Vermont uses the VPMS as a clinical tool to address the epidemic of prescription drug misuse and dependence by tracking the dispensing of controlled substances that are most likely to lead to misuse, addiction, or patient harm. Law enforcement do not have access to this system.

The VPMS is overseen by the Vermont Department of Health (VDH) Division of Alcohol and Drug Abuse Programs (ADAP). There is a dedicated program manager and in-house analytic capacity. It is administered through a contract and has changed platforms twice in the past two years, first as a result of a routine State bid process followed by a second change a year later when the chosen vendor was purchased, and all clients were moved to a newly developed platform. Due to these changes, many of Vermont's in-state resources were engaged in planning, transition, and user acceptance testing activities to ensure that the data in the system is accurate and usable by prescribers and pharmacists.

All Vermont-licensed pharmacies, including mail-order pharmacies, are required to provide prescription information on all Schedule II–IV drugs dispensed within 24 hours or one business day of dispensing. In 2017, the upload frequency increased from weekly to daily and the Vermont overall pharmacy upload compliance rate is over 95%.

In 2014, Vermont-licensed prescribers of controlled substances were mandated to register for VPMS and query the system under specific circumstances. In 2017, new Administrative Rules were implemented which increased the circumstances under which prescribers were required to query VPMS and added requirements for querying by pharmacists. Prescribers and pharmacists may appoint delegates to query the system on their behalf.

http://www.healthvermont.gov/sites/default/files/documents/pdf/REG_vpms-20170701.pdf

Through the use of VPMS, prescriber education programs, Rule changes, and messaging, Vermont has seen a 26 percent decrease in total MME opioid analgesics prescribed in Vermont between 2015 and 2017.

Please note that the PDMP measures that Vermont currently uses to monitor the dispensing of Schedule II-IV drugs are as follows:

1. Average daily morphine milligram equivalents (MME) per opioid analgesic prescription
2. Average days supply per opioid analgesic prescription
3. Portion of opioid analgesic prescriptions:
 - a. < 50 MME
 - b. 50-90 MME
 - c. >90 MME
4. Total MME dispensed
5. Percent of the Vermont population receiving at least one prescription for:
 - a. Opioid analgesics
 - b. Medication-Assisted Treatment drug
 - c. Benzodiazepine
 - d. Stimulants

Attachment N

6. Pharmacy uploading compliance rates
7. Prescribers registered with PDMP
8. Pharmacists registered with PDMP
9. Number of PDMP linkages to other states/health systems
10. Number of system queries
11. Multiple provider episodes for prescription opioids (five or more prescribers and five or more pharmacies in a six-month period) per 100,000 residents
12. Patients prescribed long-acting/extended-release (LA/ER) opioids who were opioid-naive (i.e., patients who have not taken opioid analgesics in 30 days).
13. Patient prescription days with overlapping opioid prescriptions (percentage)
14. Patient prescription days with overlapping opioid and benzodiazepine prescriptions (percentage)

Prescription Drug Monitoring (PDMP) Functionalities

Current State:

- Vermont currently shares prescription data with CT, MA, ME, NH, NJ, NY, and RI.
- Prescriber and pharmacy delegates are allowed. Delegates are linked to their providers account and can query on their behalf. This helps to streamline use of VPMS in busy medical settings.
- Quarterly and annual reports showing state- and county-level prescribing patterns are available on our website for needs assessment and monitoring purposes:
<http://www.healthvermont.gov/alcohol-drugs/reports/data-and-reports>
- Vermont has evaluated integrating PDMP data into electronic medical records and the health information technology platform and has determined that it may be feasible through the currently available tool through PMP Gateway. This has not yet been tested by the State for compliance to state security and audit requirements and there is a cost to the end user that some VT health systems may not be willing to pay.
- Prescriber Insight Reports, which allow prescribers to compare their prescribing to similar prescriber types and specialties, were implemented March 28, 2018. ADAP, through a grant from the Centers for Disease Control and Prevention, has capacity to provide quality improvement activities to prescribers and as part of the dissemination Prescriber Insight Report process, has highlighted the availability of these services.

Future State:

- Under the guidance of a recently established Health Information Exchange (HIE) Steering Committee, the Department of Vermont Health Access is currently working to develop a statewide Health Information Exchange/Health-IT strategic plan. The plan will address the state's health-IT network and needs, which includes SUD efforts overall, including VPMS. By November 2018, the Steering Committee will produce a final plan for submission to the Green Mountain Care Board, the State's health system regulatory body. The Board is statutorily obligated to review the plan for approval.
- Vermont's current contract with the PDMP provider includes funding to build connectivity between the VMPS and the RxCheck hub. This hub is a state PDMP-owned and governed solution to data sharing between states or health systems. RxCheck is building the capacity for audit trails of PDMP use, which will address concerns which are preventing current

Attachment N

connectivity. Vermont is ready to pursue this, however the VPMS vendor is still working on meeting Vermont's contract-required system functionality. This is the top VPMS priority after the project is fully implemented. The program manager participates in the RxCheck governing group.

- PMP Gateway claims to be able to fulfill all safety and security audits for connectivity to health systems/EHRs although there are several outstanding concerns.
 - When querying within the VPMS, close matches of patient names are returned as a “pick list” to the provider to ensure the most complete and accurate prescription histories. This functionality does not exist within a Gateway connection, as results for only exact matches of records are populated into the connected health system. This increases the possibility that incorrect prescription records could be populated into the report or that incomplete prescription histories would be returned.
 - Registration within VPMS is required to access the system and is only allowed for certain specific roles and provider types. Gateway must be able to validate that no unregistered users are able to access VPMS system data through their health system and be able to respond immediately to deactivate or discontinue any access that a deactivated VPMS user may have.
 - The ability to obtain VPMS records through court order is a separate process from that required to obtain medical records. Gateway must validate that no record of the VPMS data will be stored within the connected health system.
 - Audit trails from the system must include records of patients queried, by whom, what results were returned, and when. Currently, the accuracy of the records of which patient data was viewed has yet to be validated.
 - This system also comes at a cost to the health care systems. VT statute requires there be a no-cost option to prescribers, thus the interest in RxCheck hub. Ideally, both options will be available.
- Connectivity with other states is based on the likelihood of people traveling to or from those states. As a tourist destination, Vermont pulls tourists primarily from the New England area, so these areas were connected first. The next priority is Florida, due to Vermonters who live there in the winter. After that, states with highest rates of opioid prescribing, closest proximity, and the result of Vermont's assessment of the sharing states' data controls will be prioritized. Timing is based largely on availability of internal resources.

Summary of Actions Needed:

- ADAP to negotiate data sharing with FL after July 1, 2018 when FL statute allows for sharing. By year end, connect a total of at least three new states.
- ADAP to work with vendor to complete contract deliverables and develop the linkage to RxCheck hub by October 31, 2018.
- VDH to test PMP Gateway connectivity for compliance with VT safety and security audits by December 31, 2018.

Current and Future PDMP Query Capabilities

Current State :

Attachment N

- Vermont contracts for the PDMP and because of this, use the vendor's algorithm for patient grouping. The vendor has an automated matching algorithm. However, some groupings are tagged for manual review, which is done routinely by VPMS program staff. System users also notify the program when they find improperly matched records, and these are also manually corrected.
- Interstate data sharing queries require an exact or a manually grouped match to pull records. This increases the possibility that incorrect prescription records could be populated into the interstate reports or that incomplete prescription histories could be returned.
- There is a master patient index developed by the State for patient grouping for analytical and reporting purposes.

Future State:

- In an ideal future state, it would be possible to integrate the VT master patient index with the vendor system.

Summary of Actions Needed:

- VDH will explore feasibility of integrating the VT MPI with the vendor system through discussions with the vendor. If deemed possible, determine timing, cost, and process. Discussions to begin by December 31, 2018.
- As discussions continue around EHR integration, interstate data sharing, RxCheck and PMP Gateway, be cognizant of the need for an MPI.

Use of PDMP – Supporting Clinicians with Changing Office Workflows/Business Processes

Current State:

- VT statute and rule dictates limits on prescribing that are consistent with CDC prescribing guidelines and went into effect July 1, 2017.
http://www.healthvermont.gov/sites/default/files/documents/pdf/REG_opioids-prescribing-for-pain.pdf
- VT has a prescribing toolkit and has provided associated training on workflow. The toolkit has been updated to reflect VT rules and the CDC prescribing guidelines.
https://www.med.uvm.edu/ahec/workforceresearchdevelopment/toolkits-and-workbooks/opioid_prescribing
- The PDMP allows querying by delegates as well as batch processing of queries to increase the efficiency of use of the system.
- VT has held learning collaboratives with prescribers around prescribing practices and on alternatives to opioids in treating chronic pain.
- Technical assistance in office workflow and best prescribing practice is available to any prescriber.

Attachment N

- VDH has provided prescribers with tools and materials to assist them in working with pain patients. <http://www.healthvermont.gov/alcohol-drugs/professionals/resources-patients-and-providers>
- Focus groups and interviews have been conducted to determine the best ways of communicating with prescribers.

Future State :

- See integration into EHR discussion above.
- Beginning in April 2018, VDH is implementing Project ECHO which is a mechanism to build pain management expertise among primary care physicians through mentorship with experts in the field. Due to high demand, additional sessions will be added.
- Additional learning collaboratives are scheduled in 2018.
- VDH is revamping the website to make all prescriber and patient resources easier to find.
- Ongoing technical assistance is available.
- Clinical Alerts will be implemented in the system. These alerts provide proactive reporting within VPMS to prescribers to highlight prescribing patterns or concerns of which to be aware. Alerts are available for multiple situations that may indicate an increased risk of overdose, dependence, or misuse.

Summary of Actions Needed:

- VDH is promoting the availability of technical assistance at the prescriber level. Promotion has been integrated into the March 2018 implementation of prescriber insight reports listed above and the impact of implementation of the insight reports is being evaluated.
- VDH is conducting an impact evaluation of the July 1, 2017 pain prescribing rule change. Planned completion is expected by December 31, 2018.
- VDH began user acceptance testing of the clinical alerts February 2018 and has a target implementation date of July 1, 2018.

Master Patient Index / Identity Management

Current State :

- See discussion of Master Patient index above as it pertains to the PDMP.
- Improved patient grouping in VPMS allows more accurate identification of patients meeting multiple prescriber episodes. Prescribers are notified of patients with potentially risky opioid use (through a letter or within the system) with instructions to review with patients and refer to external SUD treatment, if needed.
- The State of Vermont has an established health IT infrastructure that supports the provision of care and measurement of the health care system and reform initiatives. The State's health-IT infrastructure includes, but is not limited to, a PDMP, public health registries (immunization, births/deaths, and cancer), a statewide health information exchange with supporting data extraction capabilities, behavioral health registry, an All-Payer Claims Database, and a clinical

Attachment N

registry within the Medicaid Agency that is operated by the Blueprint for Health program. Additionally, a care coordination platform supports providers participating in Vermont's All-Payer Model and all of Vermont's hospitals and a considerable number of eligible providers have taken advantage of the Meaningful Use program to adopt electronic health record systems. Incorporation of substance use treatment information will require compliance with 42 CFR Part 2.

- Some systems are integrated, others are not. There are a variety of mechanisms for addressing identity management.

Future State:

- Greater interoperability between existing systems, with appropriate identity management.
- Increased use of existing and updated systems.
- VPMS threshold letters will be system generated.

Summary of Actions Needed:

- Under the guidance of a recently established Health Information Exchange (HIE) Steering Committee, the Department of Vermont Health Access is currently working to develop a statewide Health Information Exchange/Health-IT strategic plan. The Plan will address the state's health-IT network and needs, including SUD efforts. By November 2018, the Steering Committee will produce a final plan for submission to the Green Mountain Care Board, the State's health system regulatory body. The Board is statutorily obligated to review the plan for approval. Actions, responsibilities, and timelines will be guided by the strategic plan.
- VDH is currently working with the VPMS vendor on threshold reporting. This is a contract deliverable and should be available by 12/31/18.

Overall Objective for Enhancing PDMP Functionality & Interoperability

Current State:

- VT rules require use of the PDMP by prescribers and pharmacists to prevent overprescribing and identify potentially risky opioid use. VT is also providing training to prescribers and pharmacists on both appropriate prescribing and use of the PDMP.
- Pharmacists are required to query the PDMP if an individual presents a prescription and does not pay for it with the insurance on file.
- VT Medicaid has a pharmacy lock in program for Medicaid recipients who may be doctor or pharmacy shopping.
- Prescriber Insight Reports, listed above, were implemented March 2018.

Future State:

- Vermont has a fully integrated VPMS with proactive reporting to prescribers and pharmacists to decrease initiation and misuse of prescription drugs.

Attachment N

- Those Vermonters with opioid use disorders, identified through this and other avenues, are referred to and receive treatment.

Summary of Actions Needed:

- Implement actions outlined in the “future” sections throughout Attachment A.

ATTACHMENT O

SUD Monitoring Protocol

Medicaid Section 1115 SUD Demonstration Monitoring
 Protocol Vermont Global Commitment to Health
 Demonstration Resubmitted on 6/18/18

1. Transmittal Title Page for Vermont’s SUD Components of Broader Demonstration

State	Vermont
Demonstration Name	Global Commitment to Health
Approval Date	SUD: June 6, 2018
Approval Period	SUD: July 1, 2018 – December 31, 2021
SUD (or if broader demonstration, then SUD Related) Demonstration Goals and Objectives	<p>Over the demonstration period, Vermont, in addition to the overall demonstration goals, includes the following six new goals to support the substance use disorder (SUD) program.</p> <ol style="list-style-type: none"> 1. Increased rates of identification initiation, and engagement in treatment; 2. Increase adherence to and retention in treatment; 3. Reductions in overdose deaths, particularly those due to opioids; 4. Reduced utilization of emergency department and inpatient hospital settings for treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services; 5. Fewer readmissions to the same or higher level of care where the readmission is preventable or medically inappropriate; and 6. Improved access to care for physical health conditions among beneficiaries.

2. SUD Reporting Topics

Vermont plans to report the narrative information requested in the SUD Monitoring Report Template as part of the comprehensive Global Commitment to Health 1115 demonstration quarterly and annual progress reports. Specifically, the following information will be reported under the heading “Opioid Use Disorder/Substance Use Disorder Program” under Section III. Operational/Policy Developments/Issues in the Table of Contents:

- Executive Summary,
- Assessment of Need and Qualification for SUD Services,
- Milestones 1 – 7,
- Health IT,
- Narrative for SUD related metrics,
- SUD-related Demonstration Operations and Policy, and
- Notable State Achievements and/or Innovations.

SUD Demonstration Evaluation Update and Budget Neutrality will be incorporated into existing report sections titled “Demonstration Evaluation” and “Financial/Budget Neutrality Development/Issues” respectively. The SUD-related metrics workbook will be submitted along with the corresponding quarterly and annual progress reports, but as a separate file.

Proposed Modifications to SUD Narrative Information on Implementation, by Reporting Topic

Summary of proposed modification	Related metric (if any)	Justification for modification
1. Assessment of Need and Qualification for SUD Services		
		<i>No modifications are planned.</i>
<i>[Add rows as needed]</i>		

<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
2. Access to Critical Levels of Care for OUD and other SUDs (Milestone 1)		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		<i>No modifications are planned</i>
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
3. Use of Evidence-based, SUD-specific Patient Placement Criteria (Milestone 2)		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		<i>No modifications are planned</i>

<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
4. Use of Nationally Recognized SUD-specific Program Standards to Set Provider Qualifications for Residential Treatment Facilities (Milestone 3)		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		<i>No modifications planned</i>
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
5. Sufficient Provider Capacity at Critical Levels of Care including for Medication Assisted Treatment for OUD (Milestone 4)		

Medicaid Section 1115 SUD Demonstration Monitoring Protocol
 Vermont Global Commitment to Health Demonstration
 Resubmitted on 6/18/18

<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		<i>No modifications planned</i>
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
6. Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and OUD (Milestone 5)		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		<i>No modifications planned</i>
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		

<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
7. Improved Care Coordination and Transitions between Levels of Care (Milestone 6)		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		<i>No modifications planned</i>
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
8. SUD Health Information Technology (Health IT)		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		<i>No modifications planned</i>
<i>[Add rows as needed]</i>		

<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
9. Other SUD-Related Metrics		
Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)		<i>No modifications planned</i>
[Add rows as needed]		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
10. Budget Neutrality		
Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)		<i>No modifications planned</i>

<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
11. SUD-Related Demonstration Operations and Policy		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		<i>No modifications planned</i>
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
12. SUD Demonstration Evaluation Update		

Medicaid Section 1115 SUD Demonstration Monitoring Protocol
 Vermont Global Commitment to Health Demonstration
 Resubmitted on 6/18/18

<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		<i>No modifications planned</i>
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
13. Other Demonstration Reporting		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		<i>No modifications planned</i>
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		

<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
14. Notable State Achievements and/or Innovations		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template</i>		<i>No modifications planned</i>
<i>(Narrative Information on Implementation)</i>		
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		

3. SUD Metrics Workbook

Vermont plans to report all twenty-four CMS required metrics as well as three state-identified Health IT metrics. The name, description, and detail for all Vermont SUD metrics can be found in the Monitoring Tab of the accompanying [SUD Metrics Workbook](#) which is posted on the Department of Vermont Health Access website.

4. Budget Neutrality

Acknowledgement of Budget Neutrality Reporting-

The state has reviewed the Budget Neutrality workbook provided by the project officer and understands the expectations for quarterly and annual monitoring reports. The state will provide the requested budget neutrality information (no modifications).

5. SUD Demonstration Monitoring Reporting Schedule

SUD Demonstration monitoring reporting schedule will follow the Broader Global Commitment to Health Demonstration monitoring schedule which is listed in the table below:

Demonstration Year, Reporting Quarter	Annual or Quarterly Report	Report Submission Date
DY2, Q3: 2018	Quarterly	November 29, 2018
DY2, Q4: 2018	Annual	April 1, 2019
DY3, Q1: 2019	Quarterly	May 30, 2019
DY3, Q2: 2019	Quarterly	August 29, 2019
DY3, Q3: 2019	Quarterly	November 29, 2019
DY3, Q4: 2019	Annual	April 1, 2020
DY4, Q1: 2020	Quarterly	May 30, 2020
DY4, Q2: 2020	Quarterly	August 29, 2020
DY4, Q3: 2020	Quarterly	November 29, 2020
DY4, Q4: 2020	Annual	April 1, 2021
DY5, Q1: 2021	Quarterly	May 30, 2021
DY5, Q2: 2021	Quarterly	August 29, 2021
DY5, Q3: 2021	Quarterly	November 29, 2021
DY5, Q4: 2021	Annual	April 1, 2022

Medicaid Section 1115 SUD Demonstration Monitoring Protocol
 Vermont Global Commitment to Health Demonstration
 Resubmitted on 6/18/18

Vermont will begin reporting on SUD metrics in its Q2: 2019 report (to be submitted on August 29, 2019). The reporting schedule for Vermont metrics for second SUD demonstration year (DY) is contained in the table below.

Dates of reporting quarter	VT's broader 1115 DY	VT's SUD DY	Report due (per STCs schedule)	SUD metrics included in report
January 1, 2019 – March 31, 2019	DY3 Q1	DY2 Q1	5/30/2019*	<ul style="list-style-type: none"> Narrative information for SUD DY2 Q1 Metrics based on non-claims administrative data for SUD DY2 Q1 Monthly and quarterly metrics for SUD DY2 Q4 Annual CMS-constructed and state-identified metrics (calculated for CY 2018) Annual metrics that are established quality measures (calculated for CY 2018)
April 1, 2019 – June 30, 2019	DY3 Q2	DY2 Q2	8/29/2019	<ul style="list-style-type: none"> Narrative information for SUD DY2 Q2
				<ul style="list-style-type: none"> Metrics based on non-claims administrative data for SUD DY2 Q2 Monthly and quarterly metrics for SUD DY2 Q1
July 1, 2019 – September 30, 2019	DY3 Q3	DY2 Q3	11/29/2019	<ul style="list-style-type: none"> Narrative information for SUD DY2 Q3 Metrics based on non-claims administrative data for SUD DY2 Q3 Monthly and quarterly metrics for SUD DY2 Q2
October 1, 2019 – December 31, 2019	DY3 Q4	DY2 Q4	4/1/2020	<ul style="list-style-type: none"> Narrative information for SUD DY2 Q4 Metrics based on non-claims administrative data for SUD DY2 Q4 Monthly and quarterly metrics for SUD DY2 Q3
January 1, 2020 – March 31, 2020	DY4 Q1	DY3 Q1	5/30/2020	<ul style="list-style-type: none"> Narrative information for DY3 Q1 Metrics based on non-claims administrative data for DY3 Q1 Monthly and quarterly metrics for SUD DY2 Q4 Annual CMS-constructed and state-identified metrics (calculated for SUD DY 2) Annual metrics that are established quality measures (calculated for CY 2019)

Note: This table assumes that the first SUD “demonstration year” ran from July 1, 2018 – December 31, 2019, to align with the state’s broader 1115 reporting schedule.

Medicaid Section 1115 SUD Demonstration Monitoring Protocol
Vermont Global Commitment to Health Demonstration
Resubmitted on 6/18/18

*Per recommendation in Table 1, the state does not plan to begin reporting SUD metrics until its August 29, 2019 report. In that submission, the state should plan to include all metrics listed for the May 30, 2019 submission, as well as those listed here for August 29, 2019.

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Section 1115 SMI/SED Demonstration Implementation Plan

Overview: The implementation plan documents the state’s approach to implementing SMI/SED demonstrations. It also helps establish what **information** the state will report in its quarterly and annual monitoring reports. The implementation plan does not usurp or replace standard CMS approval processes, such as advance planning documents, verification plans, or state plan amendments.

This template only covers SMI/SED demonstrations. The template has three sections. Section 1 is the uniform title page. Section 2 contains implementation questions that states should answer. The questions are organized around six SMI/SED reporting topics:

1. Milestone 1: Ensuring Quality of Care in Psychiatric Hospitals and Residential Settings
2. Milestone 2: Improving Care Coordination and Transitioning to Community-Based Care
3. Milestone 3: Increasing Access to Continuum of Care, Including Crisis Stabilization Services
4. Milestone 4: Earlier Identification and Engagement in Treatment, Including Through Increased Integration
5. Financing Plan
6. Health IT Plan

State may submit additional supporting documents in Section 3.

Implementation Plan Instructions: This implementation plan should contain information detailing state strategies for meeting the specific expectations for each of the milestones included in the State Medicaid Director Letter (SMDL) on “Opportunities to Design Innovative Service Delivery Systems for Adults with [SMI] or Children with [SED]” over the course of the demonstration. Specifically, this implementation plan should:

1. Include summaries of how the state already meets any expectation/specific activities related to each milestone and any actions needed to be completed by the state to meet all of the expectations for each milestone, including the persons or entities responsible for completing these actions; and
2. Describe the timelines and activities the state will undertake to achieve the milestones.

The tables below are intended to help states organize the information needed to demonstrate they are addressing the milestones described in the SMDL. States are encouraged to consider the evidence-based models of care and best practice activities described in the first part of the SMDL in developing their demonstrations.

The state may not claim FFP for services provided to Medicaid beneficiaries residing in IMDs, including residential treatment facilities, until CMS has approved a state’s implementation plan.

Memorandum of Understanding:

The Vermont State Mental Health Authority, the Vermont Department of Mental Health (DMH),

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

is a department under the Vermont Agency of Human Services (AHS). AHS serves as Vermont's Single State Medicaid Agency, of which DMH is a part. Therefore, no formal agreement is needed to delineate how these organizations will work together to design, deliver, and monitor services for beneficiaries with SMI or SED.

State Point of Contact:

Name and Title: Ashley Berliner, Director of Medicaid Policy

Telephone Number: 802-578-9305

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Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

1. Title page for the state's SMI/SED demonstration or SMI/SED components of the broader demonstration

The state should complete this transmittal title page as a cover page when submitting its implementation plan.

STATE	Vermont
DEMONSTRATION NAME	Global Commitment to Health 11-W-00194/1
APPROVAL DATE	<i>December 5, 2019</i>
APPROVAL PERIOD	<i>January 1, 2017 – December 31, 2021</i>
IMPLEMENTATION DATE	<i>January 1, 2020</i>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

2. Required implementation information, by SMI/SED milestone

Answer the following questions about implementation of the state’s SMI/SED demonstration. States should respond to each prompt listed in the tables. Note any actions that involve coordination or input from other organizations (government or non-government entities). Place “NA” in the summary cell if a prompt does not pertain to the state’s demonstration. Answers are meant to provide details beyond the information provided in the state’s special terms and conditions. Answers should be concise, but provide enough information to fully answer the question.

This template only includes SMI/SED policies.

Prompts	Summary
SMI/SED. Topic_1. Milestone 1: Ensuring Quality of Care in Psychiatric Hospitals and Residential Settings	
<p><i>To ensure that beneficiaries receive high quality care in hospitals and residential settings, it is important to establish and maintain appropriate standards for these treatment settings through licensure and accreditation, monitoring and oversight processes, and program integrity requirements and processes. Individuals with SMI often have co-morbid physical health conditions and substance use disorders (SUDs) and should be screened and receive treatment for commonly co-occurring conditions particularly while residing in a treatment setting. Commonly co-occurring conditions can be very serious, including hypertension, diabetes, and substance use disorders, and can also interfere with effective treatment for their mental health condition. They should also be screened for suicidal risk.</i></p> <p><i>To meet this milestone, state Medicaid programs should take the following actions to ensure good quality of care in psychiatric hospitals and residential treatment settings.</i></p>	
Ensuring Quality of Care in Psychiatric Hospitals and Residential Treatment Settings	

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
<p>Assurance that participating hospitals and residential settings are licensed or otherwise authorized by the state primarily to provide mental health treatment; and that residential treatment facilities are accredited by a nationally recognized accreditation entity prior to participating in Medicaid</p>	<p>Current Status: Milestone achieved.</p> <p>Participating IMD facilities are licensed by the State and are accredited by the Joint Commission.</p> <p>The Vermont Department of Health’s Hospital Licensing Rule requires that, “No organization or individual may establish, conduct, or maintain operation of a Hospital in Vermont without being granted a license by the State Licensing Agency.” Additionally, this rule requires that hospitals comply with all CMS Conditions of Participation, and incorporates 42 CFR 482.60-482.66 specific to psychiatric hospitals and units:</p> <p><i>5.1 Compliance with CMS Conditions of Participation</i></p> <p><i>5.1.1 To be licensed and retain licensure in Vermont, each Hospital shall comply with all applicable CMS Conditions of Participation referenced in Section 3.4 of this rule or be operating under a Plan of Correction as described in Section 7.0 of this rule.</i></p> <p><i>5.1.2 To demonstrate compliance with CoPs, each Vermont Hospital shall make themselves available for a comprehensive, on-site and unannounced survey by the State Survey Agency:</i></p> <p><i>5.1.2.1 Occurring on average once every three years or at a frequency determined by CMS.</i></p> <p><i>5.1.2.2 Whenever CMS requires a Validation Survey for an accredited Hospital with Deemed Status.</i></p> <p><i>5.1.2.3 Whenever the Department or its designee determines that a survey is required as referenced in Section 5.3 of this rule.</i></p> <p><i>5.1.3 As part of the annual Hospital licensing process, each Hospital shall provide to the Department any documents necessary to verify that the applicant Hospital has met the requirements of the CoPs.</i></p> <p><i>5.1.4 A Hospital license is not transferable or assignable and shall be issued only for the premises and persons named in the application. A licensed Hospital contemplating a change of ownership or the elimination or significant reduction of clinical services shall provide at least ninety (90) days advance notice to the Licensing Agency.</i></p> <p><i>5.1.5 The Hospital license shall be posted in a conspicuous place on the licensed facility’s premises.</i></p>
	<p>Future Status: No changes are expected.</p>
	<p>Summary of Actions Needed: None.</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
<p>Oversight process (including unannounced visits) to ensure participating hospital and residential settings meet state’s licensing or certification and accreditation requirements</p>	<p>Current Status: Milestone achieved.</p> <p>The Vermont Department of Health’s Hospital Licensing Rule requires that hospitals comply with all CMS Conditions of Participation, including:</p> <p><i>5.1 Compliance with CMS Conditions of Participation 5.1.1. To be licensed and retain licensure in Vermont, each Hospital shall comply with all applicable CMS Conditions of Participation referenced in Section 3.4 of this rule or be operating under a Plan of Correction as described in Section 7.0 of this rule.</i></p> <p><i>5.1.2 To demonstrate compliance with CoPs, each Vermont Hospital shall make themselves available for a comprehensive, on-site and unannounced survey by the State Survey Agency:</i></p> <p><i>5.1.2.1 Occurring on average once every three years or at a frequency determined by CMS.</i></p> <p><i>5.1.2.2 Whenever CMS requires a Validation Survey for an accredited Hospital with Deemed Status.</i></p> <p><i>5.1.2.3 Whenever the Department or its designee determines that a survey is required as referenced in Section 5.3 of this rule.</i></p> <p><i>5.1.3 As part of the annual Hospital licensing process, each Hospital shall provide to the Department any documents necessary to verify that the applicant Hospital has met the requirements of the CoPs.</i></p> <p>The Vermont Division of Licensing and Protection performs the survey and certification hospital oversight functions on behalf of CMS. These functions include unannounced visits to ensure that the participating IMD facilities are meeting licensure and accreditation requirements.</p> <p>Future Status: No changes are expected.</p> <p>Summary of Actions Needed: None.</p>
<p>Utilization review process to ensure beneficiaries have access to the appropriate levels and types of care and to provide oversight on lengths of stay</p>	<p>Current Status: Milestone achieved.</p> <p>The Vermont Department of Health’s Hospital Licensing Rule adopts the federal standards in 42 C.F.R. 482.30, which details requirements for utilization review.</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<p>The Department of Vermont Health Access (DVHA) conducts numerous utilization management and review activities to ensure that quality services, those which increase the likelihood of desired health outcomes and are consistent with prevailing professionally recognized standards of medical practice, are provided to members and that providers are using the program appropriately, effectively and efficiently. DVHA and DMH staff utilize clinical criteria for making utilization review decisions that are objective and based on sound medical evidence.</p> <p>In 2012, DMH and DVHA collaborated to create a unified, consistent utilization management system for all Vermont Medicaid-funded inpatient psychiatric and detoxification services. In addition to the joint DMH/DVHA Utilization Review Team, DMH formed an expanded Care Management Unit to actively support the system of care in Vermont and facilitate flow throughout the highest levels of care.</p> <p>Additionally, Medicaid holds utilization review calls weekly with the Brattleboro Retreat, the only inpatient mental health facility for children and adolescents in Vermont, to help coordinate inpatient care.</p> <p>The goals for the utilization management system are as follows:</p> <ul style="list-style-type: none">• Inpatient care is provided only as long as necessary for safety and/or other acute needs;• There are standardized criteria for admission, continued stay, and discharge throughout the system of care;• Care is continuous between the ongoing community treatment teams and episodes of inpatient care. The hospital or residential facility and community teams develop and share a common treatment plan developed in partnership with the individual and his/her family, beginning within 24 hours of admission;• Resources of the public system are effectively and efficiently used; and• The care management system will ensure access to effective, appropriate, recovery-based services that promote health, wellness, resiliency, and successful integration into the community.
	<p>Future Status: No changes are expected.</p>
	<p>Summary of Actions Needed: None.</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
<p>Compliance with program integrity requirements and state compliance assurance process</p>	<p>Current Status: Milestone achieved.</p> <p>All Medicaid-enrolled providers, including the participating IMD facilities, are required to comply with all applicable state and federal laws. The terms of the Medicaid Provider Contract state:</p> <p><i>5.1 The parties to this Agreement acknowledge and expect that over the term of this Agreement laws may change. Specifically, the parties acknowledge and expect (i) federal Medicaid statutes and regulations, (ii) state Medicaid statutes and rules, (iii) state statutes and rules governing practice of health care professions, and (iv) any other laws cited in the Agreement may change. The parties shall be mutually bound by such changes.</i></p> <p>Additionally, Article VI. Audit Inspection of the Medicaid Provider Contract outlines Medicaid program integrity requirements, which incorporates applicable federal program integrity regulation.</p> <p>The participating IMD facilities are signatories to the Medicaid Provider Contract and are in compliance with its terms.</p> <p>Future Status: No changes are expected.</p> <p>Summary of Actions Needed: None.</p>
<p>State requirement that psychiatric hospitals and residential settings screen beneficiaries for co-morbid physical health conditions, SUDs, and suicidal ideation, and facilitate access to treatment for those conditions</p>	<p>Current Status: Milestone achieved.</p> <p>The Vermont Department of Health’s Hospital Licensing Rule requires that hospitals comply with all CMS Conditions of Participation, including 42 CFR 482.60-482.66 specific to psychiatric hospitals and units.</p> <p>The following Federal Conditions of Participation required for State Hospital licensure are related to this milestone:</p> <p><u>§482.61 Condition of participation: Special medical record requirements for psychiatric hospitals.</u> <u>The medical records maintained by a psychiatric hospital must permit determination of the degree and intensity of the treatment provided to individuals who are furnished services in the institution.</u></p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<p><i>(a) Standard: Development of assessment/diagnostic data. Medical records must stress the psychiatric components of the record, including history of findings and treatment provided for the psychiatric condition for which the patient is hospitalized.</i></p> <p><i>(1) The identification data must include the patient's legal status.</i></p> <p><i>(2) A provisional or admitting diagnosis must be made on every patient at the time of admission, and must include the diagnoses of intercurrent diseases as well as the psychiatric diagnoses.</i></p> <p>§482.62 Condition of participation: Special staff requirements for psychiatric hospitals. The hospital must have adequate numbers of qualified professional and supportive staff to evaluate patients, formulate written, individualized comprehensive treatment plans, provide active treatment measures, and engage in discharge planning.</p> <p><i>(a) Standard: Personnel. The hospital must employ or undertake to provide adequate numbers of qualified professional, technical, and consultative personnel to:</i></p> <p><i>(1) Evaluate patients;</i></p> <p><i>(2) Formulate written individualized, comprehensive treatment plans;</i></p> <p><i>(3) Provide active treatment measures; and</i></p> <p><i>(4) Engage in discharge planning.</i></p> <p><i>(b) Standard: Director of inpatient psychiatric services; medical staff. Inpatient psychiatric services must be under the supervision of a clinical director, service chief, or equivalent who is qualified to provide the leadership required for an intensive treatment program. The number and qualifications of doctors of medicine and osteopathy must be adequate to provide essential psychiatric services.</i></p> <p><i>(1) The clinical director, service chief, or equivalent must meet the training and experience requirements for examination by the American Board of Psychiatry and Neurology or the American Osteopathic Board of Neurology and Psychiatry.</i></p> <p><i>(2) The director must monitor and evaluate the quality and appropriateness of services and treatment provided by the medical staff.</i></p> <p><i>(c) Standard: Availability of medical personnel. Doctors of medicine or osteopathy and other appropriate professional personnel must be available to provide necessary medical and surgical diagnostic and treatment services. If medical and surgical diagnostic and treatment services are not available within the institution, the institution must have an agreement with an outside source of these services to ensure that they are immediately available or a satisfactory agreement must be established for transferring patients to a general hospital that participates in the Medicare program.</i></p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<p>All participating IMD facilities are currently engaged in these activities.</p> <p>Future Status: No changes are expected.</p> <p>Summary of Actions Needed: None.</p>
<p>Other state requirements/policies to ensure good quality of care in inpatient and residential treatment settings.</p>	<p>Current Status: DMH uses the Results Based Accountability (RBA) framework to evaluate the performance of programs and initiatives. RBA is a framework that helps programs improve the lives of children, families, and communities and their performance.</p> <p>Hospital Inpatient Units:</p> <ul style="list-style-type: none"> • As discussed above, for a hospital to be licensed to operate in Vermont it must abide by the Vermont Hospital Licensing Rule. This rule requires a hospital to meet CMS regulations, which are tied to Joint Commission requirements. • DMH also must designate hospital inpatient psychiatric units in order for involuntary patients to be treated there. This is governed by DMH’s Designated Hospitals Manual and Standards. <ul style="list-style-type: none"> ○ It is the Designated Hospital’s responsibility to provide DMH with copies of specific documentation demonstrating compliance with each requirement. The Commissioner requires re-designation of Designated Hospitals every two years. To enable adequate oversight by the Department, Departmental staff arrange for a visit in advance of the designation expiration date. This visit includes interviews with key staff, a review of outcomes, and a review of policies and procedures. A written decision letter and feedback is provided to the Designated Hospital following the visit. The review may require the Designated Hospital to address any missing information or provide a corrective action plan. <p>Residential Treatment Settings:</p> <ul style="list-style-type: none"> • Adult residential treatment centers must be licensed by the Vermont Department of Aging and Independent Living (DAIL) (https://dail.vermont.gov/resources/regulations).

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<ul style="list-style-type: none"> Child residential treatment centers must be licensed by the Vermont Department for Children and Families (DCF) (https://dcf.vermont.gov/sites/dcf/files/FSD/pubs/RTP-Regs.pdf) <p>Future Status: No changes are expected.</p> <p>Summary of Actions Needed: None.</p>
<p>SMI/SED. Topic_2. Milestone 2: Improving Care Coordination and Transitioning to Community-Based Care</p>	
<p><i>Understanding the services needed to transition to and be successful in community-based mental health care requires partnerships between hospitals, residential providers, and community-based care providers. To meet this milestone, state Medicaid programs, must focus on improving care coordination and transitions to community-based care by taking the following actions.</i></p>	
<p>Improving Care Coordination and Transitions to Community-based Care</p>	
<p>Actions to ensure psychiatric hospitals and residential settings carry out intensive pre-discharge planning, and include community-based providers in care transitions.</p>	<p>Current Status: Milestone achieved.</p> <p>The Vermont Department of Health’s Hospital Licensing Rule requires that hospitals comply with all CMS Conditions of Participation and adopts 42 CFR 482.43, which details discharge planning requirements that align with this milestone.</p> <p>Additionally, DMH contracts with Community Mental Health Clinic providers, called Designated Agencies, to participate in transition efforts and discharge planning. Designated Agencies are private, non-profit service providers that are responsible for ensuring needed services are available through program delivery, local planning, service coordination, and monitoring outcomes within their region. Requirements for Designated Agencies are specified in the Mental Health Provider Manual:</p> <p><i>Transition planning is critical for the support of the individual’s ongoing treatment, recovery or wellbeing. If for any reason a transition or discharge plan cannot be developed in the timelines below, the circumstances prohibiting the planning will be documented.</i></p> <p><i>A transition plan must be developed for any individual who requires treatment intervention and/or family support who is transitioning to other services or providers outside the local network or moving to another region including but not limited to a transition from one level of care to another or a transition from one</i></p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<p><i>programming area to another. A transition plan must be developed with the individual and/or family/guardian prior to transition date.</i></p> <p><i>A discharge plan must be developed anytime an individual or child and family have completed services, chosen to discontinue services, or for whom services have been terminated. A discharge plan must be developed with the individual and/or family/guardian prior to discharge date for all individuals where the discharge is planned.</i></p> <p><i>Plans should include the following components and be developed with the individual and other appropriate participants, such as the family, whenever possible:</i></p> <ul style="list-style-type: none"><i>• progress towards goals during program participation,</i><i>• reason for discharge or transition,</i><i>• condition at last contact, and</i><i>• referrals made, if clinically indicated.</i> <p><i>For a child or adult who is in an out-of-home treatment setting, the local team supports the facility or out of home treatment provider for discharge planning.</i></p> <p><i>This includes settings such as</i></p> <ul style="list-style-type: none"><i>• out-of-home community home provider placements,</i><i>• private non-medical institutions/residential programs (in and out of state),</i><i>• hospital diversion/emergency beds,</i><i>• inpatient psychiatric hospitalization, and</i><i>• arrangements with other providers.</i> <p>All participating IMD facilities are currently engaged in intensive discharge planning and care coordination services.</p>
	<p>Future Status:</p> <p>Maintain and enhance current discharge planning and care coordination with improved strategies for connection with local community-based services.</p> <p>DMH is working on the following strategies to improve connection with local community-based services:</p> <ul style="list-style-type: none">• Collaborative Network Approach - Vermont’s version of “Open Dialogue” practice, to better inform transition to community with the patients’ and their families’ direct involvement;

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<ul style="list-style-type: none"> • Increase awareness of available community work supports for staff and individuals in psychiatric hospital care (e.g. offer short training on Evidence Based Practices for Supported Employment (EBP SE), Specialized Service Agency (SSA) work incentive; • Host employment-related in-house groups based on individuals’ lead (employing a Recovery-Orientated Cognitive Therapy approach); and • Develop ways for the local community employment specialist or Vocational Rehabilitation counselor to meet with patients and staff prior to discharge, whenever possible. <p>Summary of Actions Needed: None.</p>
<p>2.b Actions to ensure psychiatric hospitals and residential settings assess beneficiaries’ housing situations and coordinate with housing services providers when needed and available.</p>	<p>Current Status: Participating IMD Facilities Current Practice:</p> <ul style="list-style-type: none"> • Assessment of the beneficiaries housing situation and community supports and clinical needs begins at the time of the referral, continues in assessment and evaluation and on units with Treatment Planning. • Active discharge planning takes place with Social Work staff working with each of the state’s Designated Agencies to coordinate after care planning, which includes housing and residential step-down services. <p>DMH has a housing coordinator that works with Vermont landlords to aid in securing and financing stable housing for those who are homeless or have unsuitable or unstable housing.</p> <p>Future Status: Establish State policy to maintain current efforts around housing coordination and services that ensure alignment across participating IMD facilities. This policy effort will require changes to the Vermont Department of Health (VDH) hospital licensing rule and anticipate this will take 18 months.</p> <p>Summary of Actions Needed: None.</p>
<p>2.c State requirement to ensure psychiatric hospitals and residential settings contact beneficiaries and community-based providers through most effective means possible, e.g., email, text, or phone call within 72 hours post discharge</p>	<p>Current Status: Vermont does not currently meet these requirements.</p> <p>Future Status: Promulgate administrative rule that requires facilities to develop protocol for meeting this expectation. The VDH licenses IMDs through their Hospital Licensing Rule. VDH will begin rulemaking in 2020 to assure psychiatric hospitals and residential settings contact beneficiaries and community-based providers through most effective means possible. Vermont administrative rulemaking requires a robust process, likely to take up to 12 months to go into effect. The State will establish a process to ensure facilities adhere to the requirements of the future administrative rule.</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<p>Summary of Actions Needed: Establish state policy to ensure that facilities are providing high quality follow-up care that aligns with this milestone.</p>
<p>2.d Strategies to prevent or decrease lengths of stay in EDs among beneficiaries with SMI or SED prior to admission</p>	<p>Current Status: Strategies include:</p> <ul style="list-style-type: none"> • Analyze and adjust (if warranted) bed capacity: <ul style="list-style-type: none"> ○ Vermont is in the process of adding additional inpatient and residential capacity to better meet the growth in numbers of people in need of inpatient services. • Telepsychiatry: <ul style="list-style-type: none"> ○ Using telepsychiatry, Vermont Medicaid is able to fund consultation to Emergency Department (ED) staff regarding medication needs for patients to help facilitate them moving to the next appropriate level of care. In addition, telepsychiatry helps to determine the level of care that is needed for an individual in the ED. Telepsychiatry is also being increasingly used to reach people in the more remote areas of the state. With this capability, Vermont is better able to provide psychiatric supports for individuals who have traditionally only reached these supports by presenting at an ED. • Peer-to-peer support services: <ul style="list-style-type: none"> ○ Peer supports in EDs help provide a safe and stabilizing environment for the patient, which has an impact on the current psychiatric crisis and can help a patient access the appropriate level of care from the ED. Vermont already has one peer run crisis stabilization facility and a peer run intensive residential program. Vermont is considering the expansion of peer run crisis and stabilization units to help further prevent unnecessary ED visits. • SBINS - Screening, Brief Intervention, and Navigation to Services: <ul style="list-style-type: none"> ○ SBINS is an approach that helps health care providers identify risks to their patients' health and wellbeing, from a wide range of sources including drug and alcohol use, housing and food insecurity, inter-partner violence, and more. When risks are present, trained counselors offer patients support and help them access the services they need to address risk factors and maintain or improve their health. Through this process, risk factors can be addressed prior to rising to the level that requires an ED visit. SBINS is not a statewide strategy at this time, but the program is active in some EDs. • Vermont Psychiatric Survivors (VPS) peers in EDs: <ul style="list-style-type: none"> ○ VPS has a 1.0 FTE peer support staff as part of the Rutland County Community Links Program; of which one of the roles of the position is to provide support for people in crisis in emergency rooms or other places

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<p>where it may be needed. Vermont anticipates additional discussion regarding a more comprehensive peer-outreach program statewide. VPS peers in EDs help provide a safe and stabilizing environment which often results in patients stabilizing and being safely discharged from the ED with supports from the VPS peer.</p> <p>Future Status:</p> <ul style="list-style-type: none"> • Maintain and enhance efforts to prevent and decrease lengths of ED stays by continuing to pursue the strategies outlined above. In addition: <ul style="list-style-type: none"> ○ DMH is currently drafting a report to review and analyze residential capacity across the system of care, identifying the priority areas as well as the geographic areas that are in need of additional capacity. This report will be provided to the legislature in January of 2020. There is a current proposal to expand intensive residential capacity in Rutland County, Vermont; ○ DMH is currently issuing a Request for Proposal (RFP) for peer workforce development that includes review of other state workforce certification standards and funding methodologies to inform strategies for expansion of peer supports; and ○ DMH is concluding a major stakeholder engagement effort this CY19, resulting in the creation of a 10-year plan for a holistic and integrated system of care (2020-2030). This plan will include action areas for the system of care that will be supported by short, mid and long-term strategies. The plan will be provided to the legislature in January of 2020 and used to inform future policy and financial priorities of the system. <p>Summary of Actions Needed: DMH will work within required processes for the state’s executive branch and must defer to the state’s legislative process for any future decisions on investments that may be possible.</p>
<p>2.e Other State requirements/policies to improve care coordination and connections to community-based care</p>	<p>Current Status: Milestone achieved.</p> <p>Vermont currently has technical assistance grants through the National Governor’s Association and Actionable Intelligence for Social Policy. The State’s goals are to develop and enhance interoperability and data sharing on a variety of different issues, including physical health, SUD, and mental health providers.</p> <p>Vermont is also investing in care coordination through the All-Payer Accountable Care Organization (ACO) Model. OneCare Vermont makes payments to community providers for complex care coordination.</p> <p>This care coordination includes:</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<ul style="list-style-type: none"> • Outreach to engage/maintain patients in care coordination, • Provide care coordination services for patient panels, • Create shared care plans and community among care team members, • Participate in shared care planning and care conferences to facilitate the patient’s goals of care, • Support effective transitions of care (e.g. ED follow-up calls, post hospital discharge visits), • Partner with continuum of care and human services organizations, and • Attend care coordination skills trainings. <p>Complex care coordination payments to primary care, Home Health Agencies, Designated Mental Health Agencies, and Area Agencies on Aging were approximately \$ 9.1M in CY18.</p> <p>Children Specific:</p> <p>Medicaid holds utilization review calls weekly with the Brattleboro Retreat, the only inpatient mental health facility for children and adolescents in Vermont, to help coordinate inpatient care. In addition, the Vermont Department of Mental Health’s Provider Manual and Minimum Standards Guidelines for children’s mental health requires coordination of designated agencies (local providers of community mental health care) with inpatient and residential providers to transition children/youth to community-based care.</p> <p>Future Status: Maintain and enhance current efforts around care coordination.</p> <p>Summary of Actions Needed: None.</p>
<p>SMI/SED. Topic 3. Milestone 3: Increasing Access to Continuum of Care, Including Crisis Stabilization Services</p>	
<p><i>Adults with SMI and children with SED need access to a continuum of care as these conditions are often episodic and the severity of symptoms can vary over time. Increased availability of crisis stabilization programs can help to divert Medicaid beneficiaries from unnecessary visits to EDs and admissions to inpatient facilities as well as criminal justice involvement. On-going treatment in outpatient settings can help address less acute symptoms and help beneficiaries with SMI or SED thrive in their communities. Strategies are also needed to help connect individuals who need inpatient or residential treatment with that level of care as soon as possible. To meet this milestone, state Medicaid programs should focus on improving access to a continuum of care by taking the following actions.</i></p>	
<p>Access to Continuum of Care Including Crisis Stabilization</p>	

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
<p>3.a The state’s strategy to conduct annual assessments of the availability of mental health providers including psychiatrists, other practitioners, outpatient, community mental health centers, intensive outpatient/partial hospitalization, residential, inpatient, crisis stabilization services, and FQHCs offering mental health services across the state, updating the initial assessment of the availability of mental health services submitted with the state’s demonstration application. The content of annual assessments should be reported in the state’s annual demonstration monitoring reports.</p>	<p>Current Status: Milestone achieved.</p> <p>DMH provides this information in the form of an annual report to the Vermont State Legislature, pursuant to Vermont Act 79, An act relating to reforming Vermont’s mental health system.</p> <p>Future Status: Continue to conduct an annual assessment of mental health services throughout Vermont. The state will include the contents of this assessment in its annual demonstration report to CMS.</p> <p>Summary of Actions Needed: None.</p>
<p>3.b Financing plan</p>	<p>Current Status: Vermont funds a peer-run warm line that operates 18 hours per day/seven days a week. Vermont recently received a grant from the National Suicide Prevention Lifeline (NSPL) to support training and accreditation in suicide risk assessment and intervention for the warm line program. This grant has not yet been approved by Vermont’s Joint Fiscal Office (JFO) but is in process.</p> <p>Two additional crisis call centers are also slated to be recipients of the NSPL grant pending JFO approval in Vermont, which would expand coverage to 22 hours a day for in-state call response to the Lifeline. A decision on approval is expected by January 2020 and if approved, full expansion of the Lifeline call response is planned for the end of FY21.</p> <p>All ten Designated Agencies have 24-hour crisis call centers and mobile crisis units, and many Designated Agencies have embedded mental health professionals within local and state law enforcement.</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<p>DMH continues to sponsor the Team Two training that is building working relationships between local law enforcement and local mental health crisis teams.</p> <p>Future Status: Continue to explore strategy to enhance availability of community-based SMI services in Vermont through the following approaches:</p> <ul style="list-style-type: none"> • Continued annual reporting to the legislature required by Act 79 (2012) on the current status of community-based and facility-based care and the balance between these programming areas including recommendations for change; • Payment reform caseload and rate analysis. Payment reform efforts implemented in 2019 seek to provide Vermont with new tools for analyzing needs, strengths, volume and caseloads in community-based mental health programs. DMH will be phasing in use of these tools from CY2020 through CY2023; and • 10-Year Plan for a holistic and integrated system of care. DMH is concluding a major stakeholder engagement effort this CY2019, resulting in the creation of a 10-year plan for the system of care (2020-2030). This plan will include action areas for the system of care that will be supported by short, mid and long-term strategies. The plan will be provided to the legislature and used to inform future policy and financial priorities of the system. <p>Summary of Actions Needed: None.</p>
<p>3.c Strategies to improve state tracking of availability of inpatient and crisis stabilization beds</p>	<p>Current Status: Milestone achieved.</p> <p>Medicaid maintains a bed board of all hospitals and residential placements funded by Medicaid.</p> <p>Future Status: Enhancements are planned to update the bed board data to include SUD placements.</p> <p>Summary of Actions Needed: None.</p>
<p>3.d State requirement that providers use a widely recognized, publicly available patient assessment tool to</p>	<p>Current Status: All participating IMD facilities currently use InterQual/McKesson to help determine appropriate level of care and length of stay.</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
determine appropriate level of care and length of stay	<p>Future Status: The state will establish a policy to require the use of evidence-based, publicly-available patient assessment tool(s) in order to achieve this milestone. The implementation of this policy will need to go through the rulemaking process in Vermont and it is anticipated that this will take 18 months.</p> <p>Summary of Actions Needed: Establish state policy to require the use of evidence-based, publicly-available patient assessment tool(s) in order to achieve this milestone.</p>
Other state requirements/policies to improve access to a full continuum of care including crisis stabilization	<p>Current Status: Vermont has an array of community-based systems of supports:</p> <ul style="list-style-type: none"> • There are local crisis bed alternative programs in all Designated Agency catchment areas, as well as regional Intensive Residential Recovery Programs, to provide transitional treatment and recovery-oriented support environments. Peer supported crisis bed and medication-alternative residential programs exist around the state. Additionally, Middlesex Therapeutic Community Residential Program also supports step-down opportunities for individuals from more restrictive hospital-based care. • Emergency Services are provided by Designated Agencies and include mobile crisis teams to respond to needs in the community, as well as phone support and prevention services. <ul style="list-style-type: none"> ○ When needed, clients are referred to crisis beds, which are part of a community-based hospital diversion program that offers emergency, short-term, 24-hour residential supports in a setting other than the person’s home. They are operated by the Designated Agencies and Specialized Services Agencies. ○ DMH supports a peer-run crisis bed program, called Alyssum. ○ The total crisis bed count in Vermont is 38 for adult mental health and 18 for children and youth. <p>For children and youth:</p> <ul style="list-style-type: none"> • Expansion of Hospital Diversion Program <ul style="list-style-type: none"> ○ An additional six new beds have been created in the southern part of VT. • Utilization Review of continued stay requests in children’s crisis programs (including community-based hospital diversion and crisis stabilization programs) <p>Future Status: Mobile Response and Stabilization Services (MRSS): Vermont is evaluating the possibility of adding more resources for MRSS, which is a face-to-face response provided during a family-defined crisis to provide support and intervention for a child/youth and their family before emotional and behavioral difficulties escalate. MRSS has been shown in other states to be responsive to child, youth and family needs, clinically and cost effective in “averting unnecessary” higher levels of care in settings such as EDs, inpatient</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<p>psychiatric care, residential treatment or other placement disruptions, and is often the first point of contact with families (NASMHPD 2018). MRSS takes a “just go” approach to responding to a family-defined crisis. These situations may not rise to the level of warranting screening for inpatient admission like danger to self or others, but nonetheless are a crisis situation for the family. Without stabilization, these situations could escalate to a more significant crisis over time.</p> <p>Other states have shown positive outcomes for children and families following successful implementation of MRSS, including reductions in the use (utilization and lengths of stay) of higher levels of care such as EDs, inpatient psychiatric care, and residential treatment, as well as reduced foster placement disruptions.</p> <p>Evaluation efforts related to implementing the MRSS model in Vermont have included:</p> <ul style="list-style-type: none"> • The creation of a cross-agency and stakeholder learning community; • Learning opportunities both in-person and by webinar to learn from other states’ models of implementation; • Publication of a white paper that explores the model and implementation in Vermont; and • Review of baseline needs and utilization data which could be tracked over time to evaluate the impact of MRSS. <p>Summary of Actions Needed: DMH will work within required processes for the state’s executive branch and must defer to the state’s legislative process for any future decisions on investments that may be possible.</p>
<p>SMI/SED. Topic_4. Milestone 4: Earlier Identification and Engagement in Treatment, Including Through Increased Integration</p>	
<p><i>Critical strategies for improving care for individuals with SMI or SED include earlier identification of serious mental health conditions and focused efforts to engage individuals with these conditions in treatment sooner. To meet this milestone, state Medicaid programs must focus on improving mental health care by taking the following actions.</i></p>	
<p>Earlier Identification and Engagement in Treatment</p>	
<p>4.a Strategies for identifying and engaging beneficiaries with or at risk of SMI or SED in treatment sooner, e.g., with supported education and employment</p>	<p>Current Status: Milestone achieved.</p> <p>The State continues to employ a number of strategies to better identify and engage individuals in treatment earlier including:</p> <ul style="list-style-type: none"> • Developing strategies to expand Intentional Peer Support (IPS) services to all Designated Agencies for young adults (16-22 yrs) with SED and adults with serious and persistent mental illness (SPMI); • Implementing Collaborative Network Approach (CNA) as a tool for better engaging transition-age young adults (early episode psychosis for adults) and SPMI adults;

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<ul style="list-style-type: none"> • Regularly conducting training on Dialectical Behavior Therapy (DBT) specifically for transition age youth and adults and sustaining availability of adult DBT consultation team to DAs; • Funding Jump On Board for Success (JOBS) programs in every Vermont region, with the objective of young adults with SED or SMI developing employment/education goals; • Impacting employment by maintaining funding support for Supported Employment for adults with SPMI and, within Designated Agency capacity, the adult population with mental health needs; • Funding Mental Health First Aid, an 8-hour public education program which introduces participants to the unique risk factors and warning signs of mental health conditions in youth or adults, builds understanding of the importance of early intervention, and teaches individuals how to help when a person is in crisis or experiencing a mental health challenge; and • Funding of peer-run Community Centers to engage young adults experiencing mental health issues and adults with SPMI, who may be reluctant to engage traditional mental health services in a variety of ways and offering IPS supported employment and educational supports. <p>Future Status: Maintain and build upon existing strategies for identifying and engaging beneficiaries with or at risk of SMI or SED in treatment sooner.</p> <p>Summary of Actions Needed: None.</p>
<p>4.b Plan for increasing integration of behavioral health care in non-specialty settings to improve early identification of SED/SMI and linkages to treatment</p>	<p>Current Status: Milestone achieved.</p> <p>Vermont Medicaid supports a number of programs, initiatives, and practices that support the goal of increased integration. These include, but are not limited to:</p> <ul style="list-style-type: none"> • Advancing Wellness and Resilience in Education (AWARE): Medicaid has partnered with the Vermont Agency of Education in a five-year SAMHSA grant to promote on-going collaboration at the state and local level regarding best practices to increase awareness of mental health issues, enhance wellness and resiliency skills for school age youth, and support system improvements for school-based mental health services; • Children’s Health Integration Linkage and Detection (CHILD): Five-year SAMHSA-funded grant to promote the integration and collaboration in clinical practice between primary and behavioral healthcare with the goal to improve the health and wellness of children with, or at-risk for, SED and their families;

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<ul style="list-style-type: none"> • DULCE (Developmental Understanding and Legal Collaboration for Everyone): DULCE’s purpose is to ensure that newborns and their families receive quality medical care as well as all the social services and community support they need during the first six months of the newborn’s life. A social worker is embedded in a pediatrician’s office as a way to increase access and support to new parents; • Early Childhood and Family Mental Health (ECFMH): The Early Childhood and Family Mental Health system of care for children under the age of six and their families in Vermont provides a comprehensive cross-system, cross-agency infrastructure that sustains services and supports; • Psychiatric consult for primary care: DMH contracts with child psychiatrists to provide psychiatric consultation to pediatric and family medicine primary care providers to support their management of psychiatric needs in children. This consultation supports the PCP’s mental health assessments, intervention planning and implementation; • School Mental Health: Success Beyond Six supports the provision of mental health services by a Designated Agency in a school to address the mental health needs of identified students and provide mental health consultation for the school’s multi-tiered systems of supports; • Vermont’s Screening Treatment, & Access for Mothers and Perinatal Partners (STAMPP) Grant: Five-year cooperative agreement with HRSA that works to improve the mental health and well-being of pregnant and postpartum women and their children and families by developing and sustaining a coordinated system of mental health supports (screening, referral, access to treatment and community supports) for pregnant and postpartum women; and • JOBS programs: Community and school-based program focused on keeping youth in school who are at risk of dropping out, or re-engaging youth who have stopped attending. <p>Future Status: Maintain and build upon existing strategies for increasing integration of behavioral health care in non-specialty care settings.</p> <p>Summary of Actions Needed: None.</p>
<p>4.c Establishment of specialized settings and services, including crisis stabilization, for young people experiencing SED/SMI</p>	<p>Current Status: Milestone achieved.</p> <p>Vermont Medicaid continues to foster specialized settings and services for youth with SED or SMI, including through:</p> <ul style="list-style-type: none"> • Crisis respite services for youth,

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<ul style="list-style-type: none"> • The Early Episode Psychosis Initiative to improve access and early interventions to individuals first experiencing symptoms of serious mental illness, and • Intensive residential programs specializing in working with youth SED/SMI populations. <p>Future Status: Maintain and expand Vermont’s capacity and access for specialized settings and services for young people experiencing SED or SMI.</p> <p>Summary of Actions Needed: None.</p>
<p>4.d Other state strategies to increase earlier identification/engagement, integration, and specialized programs for young people</p>	<p>Current Status: <u>Vermont Act 264 of 1989</u> requires that Human Services and Public Education work together, involve parents and coordinate services for better outcomes for children and families. The Act developed a coordinated system of care so that children and adolescents with emotional issues and their families receive appropriate educational, mental health, child welfare, juvenile justice, residential, and other treatment and support services in accordance with an individual plan.</p> <p>The Vermont Children’s Health Improvement Program (VCHIP) administered through the University of Vermont: DMH partners with the Vermont Department of Health Maternal Child Health and <u>VCHIP</u> to improve screening for child developmental and mental health, as well as perinatal mood disorders during well-child visits. VCHIP also leads an annual quality improvement project with specific Pediatric and Family Practices, called Child Health Advances Measured in Practice (<u>CHAMP</u>), in which DMH partners in the planning and year-long project as it relates to mental health and behavioral topics.</p> <p>Payment Reform expanded the use of the Child and Adolescent Needs and Strengths (CANS) nationally recognized tool for standardized measurement of child and caregiver needs and strengths.</p> <p>Future Status: Maintain and expand Vermont’s strategies to increase earlier identification/engagement, integration, and specialized programs for young people.</p> <p>Work with Agency of Education (AOE), AHS staff and stakeholders to provide technical assistance in using the coordination mechanisms supported by Act 264 (Coordinated Services Plans, Local and State Interagency Teams) to improve community collaboration on a case basis and system basis. This work is underway and will continue over the next year.</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<p>Focus on pivotal transition points in the System of Care for children, youth and families such as moving from Early Care and Learning to school-based services and youth transitioning to the adult system of care. This work is underway and will continue over the next year, facilitated by the Director of Interagency Coordination that works with DMH, DCF and DAIL.</p> <p>Summary of Actions Needed: None.</p>
<p>SMI/SED.Topic_5. Financing Plan</p>	
<p><i>te Medicaid programs should detail plans to support improved availability of non-hospital, non-residential mental health services including crisis stabilization and on-going community-based care. The financing plan should describe state efforts to increase access to community-based mental health providers for Medicaid beneficiaries throughout the state, including through changes to reimbursement and financing policies that address gaps in access to community-based providers identified in the state’s assessment of current availability of mental health services included in the state’s application.</i></p>	
<p>5.a Increase availability of non-hospital, non-residential crisis stabilization services, including services made available through crisis call centers, mobile crisis units, observation/assessment centers, with a coordinated community crisis response that involves collaboration with trained law enforcement and other first responders.</p>	<p>Current Status: In CY19, Vermont Medicaid implemented payment reform for community mental health services. Mental Health Payment Reform represents a large operational and cultural shift towards focusing on how well Vermont is doing rather than simply how much it is doing. The shift gives communities more flexibility with funding to meet the needs of the children, youth, adults, and families they serve. By simplifying the baseline payment structures and adding Value-Based payments that reward outcomes and incentivize best practice, the state aims to make it easier for Medicaid providers to meet the goal of providing efficient and effective care for Vermonters with mental health needs. DMH and the Department of Public Safety continue to support Team Two Training around the state that brings together mental health providers, law enforcement and emergency responders in a learning collaborative to produce more effective mental health response tools to community crises. DMH funding and local community funding has provided for the expansion of mobile outreach in its most urban area that now encompasses six communities. Some Designated Agencies have also dedicated funding to support local police and mental health services coordination initiatives to deter escalation of incidents that can be addressed through treatment response rather than law enforcement intervention.</p> <p>In addition to the above,</p> <ul style="list-style-type: none"> • Vermont already has one peer run crisis stabilization facility and a peer run intensive residential program; Vermont is looking to expand peer run crisis and stabilization units to help further prevent unnecessary ED visits;

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<ul style="list-style-type: none"> • Vermont is evaluating the possibility of adding more resources for Mobile Response and Stabilization Services (MRSS), which is a face-to-face response provided to a family-defined crisis to provide support and intervention for a child/youth and their family before emotional and behavioral difficulties escalate; and • Vermont is establishing state policy to maintain and enhance current efforts around housing coordination and services that ensure alignment across participating IMD facilities. <p>Future Status: Payment reform efforts aim to streamline payment structures and break down silos that can sometimes be barriers to individuals and families receiving services. The first phase of payment reform, which started in CY19, combined many different funding streams into a single funding stream in order to meet this aim. However, additional siloed funding streams continue to exist that were not included in this first phase (Alcohol and Drug Abuse Programs, Elder care, etc). Future efforts will examine the potential for incorporating more programs and services into the case rate bundle, and aligning quality and outcome goals. Process steps include:</p> <ul style="list-style-type: none"> • CY19 (first year of implementation): A workgroup was created to explore the potential addition of two funding streams through DCF; • CY20: AHS is required to submit a plan for the potential inclusion of behavioral health services into the financial target services of the All-Payer Model Agreement by the end of CY20. This opportunity will help to solidify the existing alignment between the State’s payment reform models and will build off of that alignment for future possible enhancements through the ACO-based payment reform model. • CY19-CY23: The state has a multi-year phase-in plan for measures and targets for the newly implemented mental health alternative payment model for community-based mental health services that were carved out of the All-Payer Model Agreement. By CY23, the state expects to have fully implemented all value-based payment measures and will be able to more fully evaluate progress on the state’s primary goal of improving access to care in the community. <p>Summary of Actions Needed: Continue to implement required elements of current payment reform models as documented for and approved by CMS.</p>
6.b Increase availability of on-going community-based services, e.g., outpatient, community mental health centers, partial hospitalization/day treatment, assertive community treatment,	<p>Current Status: Mental Health Payment Reform represents a large operational and cultural shift towards focusing on quality over quantity. The shift gives communities more flexibility with funding to meet the needs of the children, youth, adults, and families they serve. By simplifying the baseline payment structures and adding value-based payments that reward outcomes and incentivize best practice, Medicaid aims to make it easier for providers to meet the goal of efficient and effective care for Vermonter with mental health needs.</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
<p>and services in integrated care settings such as the Certified Community Behavioral Health Clinic model.</p>	<p>Future Status: Payment reform efforts aim to streamline payment structures and break down silos that can sometimes be barriers to individuals and families receiving services. The first phase of payment reform combined many different funding streams into a single funding stream in order to meet this aim. However, additional siloed funding streams continue to exist that were not included in this first phase (Alcohol and Drug Abuse Programs, Elder care, etc). Future efforts will examine the potential for incorporating more programs and services into the case rate bundle, and aligning quality and outcome goals. Process steps include:</p> <ul style="list-style-type: none">• CY19 (first year of implementation): A workgroup was created to explore the potential addition of two funding streams through DCF.• CY20: AHS is required to submit a plan for the potential inclusion of behavioral health services into the financial target services of the All-Payer Model Agreement by the end of CY20. This opportunity will help to solidify the existing alignment between the state’s payment reform models and will build off of that alignment for future possible enhancements through the ACO-based payment reform model.• CY19-CY23: The state has a multi-year phase-in plan for measures and targets of the newly implemented mental health alternative payment model for community-based mental health services that were carved out of the All-Payer Model Agreement. By CY23, the state expects to have fully implemented all value-based payment measures and will be able to more fully evaluate progress on the state’s primary goal of improving access to care in the community. <p>Summary of Actions Needed: Continue to implement required elements of current payment reform models as documented for and approved by CMS.</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
SMI/SED. Topic_6. Health IT Plan	
<p><i>outlined in State Medicaid Director Letter (SMDL) #18-011, “[s]tates seeking approval of an SMI/SED demonstration ... will be expected to submit a Health IT Plan (“HIT Plan”) that describes the state’s ability to leverage health IT, advance health information exchange(s), and ensure health IT interoperability in support of the demonstration’s goals.”²¹ The HIT Plan should also describe, among other items, the:</i></p> <ul style="list-style-type: none"> • <i>Role of providers in cultivating referral networks and engaging with patients, families and caregivers as early as possible in treatment; and</i> • <i>Coordination of services among treatment team members, clinical supervision, medication and medication management, psychotherapy, case management, coordination with primary care, family/caregiver support and education, and supported employment and supported education.</i> <p><i>ase complete all Statements of Assurance below—and the sections of the Health IT Planning Template that are relevant to your state’s demonstration proposal.</i></p>	
Statements of Assurance	
<p>Statement 1: Please provide an assurance that the state has a sufficient health IT infrastructure/ecosystem at every appropriate level (i.e. state, delivery system, health plan/MCO and individual provider) to achieve the goals of the demonstration. If this is not yet the case, please describe how this will be achieved and over what time period</p>	<p>The State of Vermont has an established health IT infrastructure that supports the provision of care and measurement of the health care system and reform initiatives. The state’s health-IT infrastructure includes, but is not limited to, a PDMP, public health registries (immunization, births/deaths, and cancer), a state-wide health information exchange with supporting data extraction capabilities, behavioral health registry, and an All-Payer Claims Database. A care coordination platform supports providers participating in Vermont’s All-Payer Model and all of Vermont’s hospitals and a considerable number of eligible providers have taken advantage of the Meaningful Use program to adopt electronic health record systems. Additionally, the state legislature has decided to support the purchase and roll-out of integrated Electronic Health Record systems for the state’s Designated Agencies and Specialized Service Agencies which is a move to further electronically integrate otherwise outlying sectors of the health care system.</p>
<p>Statement 2: Please confirm that your state’s SUD Health IT Plan is aligned with the state’s broader State Medicaid Health IT Plan and, if applicable, the state’s Behavioral Health IT</p>	<p>Vermont’s SUD Health IT efforts are aligned with the state’s broader Health IT Plan.</p> <p>In 2017, DVHA convened the Health Information Exchange Steering Committee, which is now statutorily obligated to support DVHA in the annual development of a statewide health-IT/exchange strategic plan. This plan is referred to as the HIE Plan. The purpose of the plan is to provide a strategy for the implementation of an integrated electronic health information infrastructure for the sharing of electronic health information among health care facilities, health care</p>

²¹ See SMDL #18-011, “Opportunities to Design Innovative Service Delivery Systems for Adults with a Serious Mental Illness or Children with a Serious Emotional Disturbance.” Available at <https://www.medicaid.gov/federal-policy-guidance/downloads/smd18011.pdf>.

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
<p>Plan. If this is not yet the case, please describe how this will be achieved and over what time period.</p>	<p>professionals, public and private payers, and patients. Per state statute, the plan must be approved by the Green Mountain Care Board annually. The latest HIE Plan is available here: https://healthdata.vermont.gov/sites/healthdata/files/HIE%20Strategic%20Plan.pdf. Full membership details and meeting information is available here: https://healthdata.vermont.gov/HIESteeringCommittee.</p> <p>The 2019 Health Information Exchange Steering Committee is heavily focused on the development of a 3-5 year health-IT/exchange investment strategy. An essential component of this strategy is bolstering public health and general data infrastructure to enable clinical decision support across the continuum, including treatment of SUD. The investment strategy will envelope work currently being done (CMS-funded via HITECH) to develop an informatics strategy at VDH. Additionally, the Vermont General Assembly appropriated \$1.5M to the State’s Designated Agency network to offset the cost of purchasing electronic medical records for the behavioral health system. As part of this appropriation, the Vermont Care Partners, the contracted not-for-profit agency that connects the Designated and Specialized Service Agencies that function on behalf of AHS, was asked to demonstrate how the implementation of these new systems would work to further the HIT goals set forth in the state-wide strategic plan and how they are to advance the state’s “Connectivity Criteria” (specific standards to guarantee quality data transmissions across the network) with a targeted look at the exchange of SUD and mental health data. The state’s recently approved HIT Implementation Advanced Planning Document (IAPD) includes funding to assess and plan the integration of the Prescription Drug Monitoring Program (PDMP) into the HIE (See a more detailed description in statement 3 below). The State Medicaid HIT Plan (SMHP) is currently being updated and the state is ensuring that there is alignment among the HIE Plan, the SMHP, and this waiver application. The State Medicaid Health IT Plan was submitted 12/18/2019.</p>
<p>Statement 3: Please confirm that the state intends to assess the applicability of standards referenced in the Interoperability Standards Advisory (ISA)²² and 45 CFR 170 Subpart B and, based on that assessment, intends to include them as appropriate in</p>	<p>All of Vermont’s interoperability efforts adhere to and/or are in direct alignment with federal guidance. As illustrated in the state-wide strategic HIE Plan, Vermont continues to demonstrate success in implementing the federal Promoting Interoperability Program and has based all strategic planning on architecture and standards set forth by CMS and the Office of the National Coordinator.</p> <p>Vermont has received approved HITECH funds to support an assessment to determine the best, most cost-effective strategy to integrate the PDMP and Health Information Exchange data. It is anticipated that a vendor would help the</p>

²² Available at <https://www.healthit.gov/isa/>.

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
subsequent iterations of the state’s Medicaid Managed Care contracts. The ISA outlines relevant standards including but not limited to the following areas: referrals, care plans, consent, privacy and security, data transport and encryption, notification, analytics and identity management.	state to understand steps required to develop Vermont's PDMP into a “qualified PDMP” ²³ ; assess how best to connect the HIE and the PDMP; determine the best strategy to facilitate integration through a PDMP hub; identify use cases and roles-based access requirements as it relates to PDMP data access; develop an auditing process that meets the needs of the PMDP manager (VDH), state law, federal law, and aligns with processes at the HIE; and support implementation of strategic design to achieve PDMP integration and interoperability. The HIE Plan, currently being updated, sustains a commitment to standards and tracks current activity at the federal level including recent advancement of the Trusted Exchange Framework and Common Agreement (TEFCA) and the ongoing advancement of the Fast Healthcare Interoperability Resource (FHIR) standard.
<i>To assist states in their health IT efforts, CMS released <u>SMDL #16-003</u> which outlines enhanced federal funding opportunities available to states “for state expenditures on activities to promote health information exchange (HIE) and encourage the adoption of certified Electronic Health Record (EHR) technology by certain Medicaid providers.” For more on the availability of this “HITECH funding,” please contact your CMS Regional Operations Group contact. ²⁴</i> <i>Enhanced administrative match may also be available under MITA 3.0 to help states establish crisis call centers to connect beneficiaries with mental health treatment and to develop technologies to link mobile crisis units to beneficiaries coping with serious mental health conditions. States may also coordinate access to outreach, referral, and assessment services—for behavioral health care--through an established “No Wrong Door System.”²⁵</i>	
Closed Loop Referrals and e-Referrals (Section 1)	

²³ Under section 1944 of the Social Security Act, beginning October 1, 2021, states must have a qualified PDMP and must require that certain Medicaid providers check information about certain Medicaid beneficiaries’ prescription drug history in the qualified PDMP before prescribing controlled substances to the beneficiary.

²⁴ See SMDL #16-003, “Availability of HITECH Administrative Matching Funds to Help Professionals and Hospitals Eligible for Medicaid EHR Incentive Payments Connect to Other Medicaid Providers.” Available at <https://www.medicaid.gov/federal-policy-guidance/downloads/smd16003.pdf>.

²⁵ Guidance for Administrative Claiming through the “No Wrong Door System” is available at <https://www.medicaid.gov/medicaid/finance/admin-claiming/no-wrong-door/index.html>.

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
<p>1.1 Closed loop referrals and e-referrals from physician/mental health provider to physician/mental health provider</p>	<p>Current State: Closed loop referrals are not currently supported. However, there are current initiatives underway which relate to closed loop referrals and which will support such referrals when additional work (see “Summary of Actions Needed” below) is completed, including:</p> <ul style="list-style-type: none"> • Implementation of a care navigation tool to support care coordination for patients in the OneCare Vermont ACO (see discussion in 2.1 below). All entities involved in a patient’s care will have access to this tool which will serve as the mechanism for documenting referrals and the subsequent encounters from those referrals. In addition, near term tactics identified in a draft HIE Strategic Plan update include determining care coordination requirements, assessing current tools, and expanding adoption of the care coordination platform. Near term is considered to be the next 12-18 months; • Vermont has a new opt-out consent policy for the sharing of electronic health information in the Vermont HIE (VHIE). Implementation planning for that policy is underway and the policy will become effective on March 1, 2020. Vermont anticipates that the percentage of people with records in the VHIE whose information can be shared with their providers will increase to approximately 95% once the consent policy is in place. Although e-referrals are not currently supported in the VHIE (see next bullet), having the data in the VHIE for most Vermonters will improve the effectiveness of e-referral functionality when it becomes available. <p>Vermont Care Partners is a statewide network of 16 State-designated, community-based agencies providing a comprehensive array of services and supports to people living with mental health conditions, substance use disorders, and intellectual and developmental disabilities. The network has approximately 32,000 clients and serves nearly 50,000 Vermonters. Nine agencies are in the process of undergoing a very robust process to implement electronic medical record (EMR)/care coordination platforms that will enable data driven practices and empower full participation in an integrated health care delivery system.</p> <p>Future State: Expand existing Vermont HIT road map to include closed loop referrals and e-referral functionality.</p> <p>Summary of Actions Needed: An update to the Vermont HIE Strategic Plan includes a technology roadmap. The roadmap identifies care coordination and support for e-referrals as a near term tactic. Near term is considered the next 12-18 months.</p> <p>Closed loop referrals are components that will eventually be covered as part of the Collaborative Services project which encompasses Master Patient Index, Terminology Services, and a data integration engine designed to support sensitive data management to further establish the functionality of closed loop referrals. The work of collaborative services is</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<p>represented in the technology roadmap for completion in the 3-5 year timeframe, though some components will be available in January 2021.</p> <p>Additional information: The HIT Roadmap (section 3.2.1.6, Care Coordination Tools) recommends tactical plan steps for the near term (12 -18 months). The State’s HIE Steering Committee will utilize a sub-committee or task force to assess, and potentially execute the following:</p> <ul style="list-style-type: none"> • Define care coordination tool requirements, • Assess current tools in use against the requirements, and • Expand the adoption of care coordination tools.
<p>1.2 Closed loop referrals and e-referrals from institution/hospital/clinic to physician/mental health provider</p>	<p>Current State: Vermont does not currently have closed loop referrals or e-referrals occurring between hospitals/clinics/intuitions and physician and mental health providers.</p>
	<p>Future State: Expand existing Vermont HIT roadmap to include closed loop referrals and e-referral functionality.</p>
	<p>Summary of Actions Needed: See responses to 1.1 above. Within the OneCare Vermont ACO, providers and hospitals have access to the CareNavigator tool (see discussion in 2.1 below). The adoption of new EHR technology by Designated Agencies (as described above) will facilitate their participation in the Care Coordination platform. Completion dates for new EHR systems in the Designated Agencies are tentatively scheduled for August 2020.</p> <p>The foundational elements necessary for closed loop referrals are part of the State’s Collaborative Services project which includes the deployment of a centralized Master Patient Index, Terminology Services, and a data integration engine, designed to support sensitive data management. These elements coupled with the Designated Agency EMR project will further establish the technical functionalities necessary for closed loop referrals. The work of collaborative services is represented in the technical roadmap for 3-5 year investment.</p> <p>See the Summary of Actions needed in section 1.1 above for a description of the tactical plan steps that will be undertaken by the HIE Steering Committee in the near term (12-18 month) period.</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
<p>1.3 Closed loop referrals and e-referrals from physician/mental health provider to community based supports</p>	<p>Current State: Vermont does not currently have closed loop referrals or e-referrals occurring between and physician and mental health providers to community-based supports.</p> <p>Future State: Expand existing Vermont HIT road map to include closed loop referrals and e-referral functionality.</p> <p>Summary of Actions Needed: See responses to 1.1 and 1.2 above. In addition, the HIE Technology Roadmap portion of the HIE Strategic Plan update identifies the importance of social determinants of health (SDOH), which are typically in the domain of community-based supports. A key objective in the roadmap is to develop tools and methods to collect, aggregate, and share SDOH data. Workflows associated with such tools and methods would involve community-based organizations and achieving this key objective would be the basis for supporting closed loop referrals to community-based supports. The Roadmap identifies SDOH-related tactics to be pursued in the near term, with a time frame of 12-18 months.</p>
<p>Electronic Care Plans and Medical Records (Section 2)</p>	
<p>2.1 The state and its providers can create and use an electronic care plan</p>	<p>Current State: To achieve the vision of a Complex Care Coordination model, in 2017-2018, OneCare Vermont deployed Care Navigator as a tool for organizations implementing community-based care coordination. The tool acts as a collaboration, communication, and engagement solution designed to deliver scalable care coordination recognizing ACO attribution, geography, and accessibility. A major component of Care Navigator is an electronic shared care plan which is used to facilitate communication among cross-organizational multi-disciplinary care teams for high and very high risk individuals.</p> <p>In addition, Care Navigator and WorkBench One work in concert to support clinical care and enable patient engagement and care coordination. For example, care coordination data, such as goals and barriers to care, are fed from OneCare’s Care Navigator software tool into WorkBenchOne where the data are combined with utilization, cost, and quality data to create a comprehensive view of the impact of the complex care coordination program across care-settings. These outputs are then used to identify care gaps, drive clinical insights, and identify variations in engagement and care across organizations and communities. The advanced analytics tools can be accessed by care team members, providers, and clinical governance committees to drive reform efforts, including refinements to advance the ACO’s clinical model, quality foci, and payment models designed to drive clinical improvements (e.g. complex care coordination payment model).</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<p>Under HITECH IAPD version 3.3, approved February 21, 2019, funding was distributed to OneCare Vermont to support the development and use of the care coordination tool for Medicaid providers participating in Vermont’s All-Payer Model. As originally planned, the development and implementation of these tools continued in CY19.</p> <p>Future State: In the current annual IAPD update submitted to CMS, DVHA is seeking continued and expanded HITECH funding to support Vermont Medicaid Next Generation ACO-participating providers in exchanging health information, coordinating care, and utilizing trusted data sources to support clinical decision making related to priority health areas. The developments of OneCare’s systems are also aimed at engaging patients in their care</p> <p>Summary of Actions Needed: Work to expand support to Vermont Medicaid Next Generation ACO -participating providers in exchanging health information, coordinating care, and utilizing trusted data sources to support clinical decision making related to priority health areas. The state’s contracts with the ACO run on a calendar year and there is an anticipated funding need for HIT activities in CY20 and CY21.</p> <p>Additional information: In the HIT Roadmap, leveraging SDOH Data is a key objective with the intent to develop tools and methods to collect, aggregate, and share SDOH data. To accomplish this, the exchange service of data extraction and aggregation must be further developed. Eight planning tactical steps, responsible entities and timelines have been identified:</p> <ul style="list-style-type: none"> • Review state data on SDOH: Review state data repositories (from AHS, AOE, others) to determine potential reuse as SDOH data. <ul style="list-style-type: none"> ○ HIE Steering Committee ○ Agency of Digital Services ○ Agency of Human Services ○ Near term (12-18 months) • Review VHIE SDOH data: Review and identify where SDOH information is captured in the VHIE today. <ul style="list-style-type: none"> ○ HIE Steering Committee ○ VITL(Vermont Information Technology Leaders) ○ Near term (12-18 months) • Align VHIE SDOH with national standards: Assess the alignment of VHIE SDOH information with emerging standards including an HL7 FHIR SDOH implementation guide and the ICD-10 Z-codes. <ul style="list-style-type: none"> ○ HIE Steering Committee

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<ul style="list-style-type: none">○ VITL○ Near term (12-18 months)● Map and align state agency data to data standards: Explore mapping state agency data to healthcare standards and promoting alignment where mapping is problematic.<ul style="list-style-type: none">○ HIE Steering Committee○ Agency of Digital Services○ Agency of Human Services○ Mid-term (18-36 months)● Monitor standards for capture of SDOH at point of care: Stay current with studies/pilots on capture of SDOH at point of care.<ul style="list-style-type: none">○ VITL○ Near term (12-18 months)● Pilot integration of AHS data into VHIE and Care Management Tools: Design pilot to study the impact of integration of state repository data into ACO Care Management Tools.<ul style="list-style-type: none">○ VITL○ VHIE Participants○ Agency of Digital Services○ Agency of Human Services○ Mid-term (18-36 months)● Explore document management services: Explore options and value propositions for increasing access to provider-generated notes, including existing capabilities to share, store and reference documents.<ul style="list-style-type: none">○ HIE Steering Committee○ VITL○ VHIE Stakeholders○ Near term (12-18 months)● Develop RFP for statewide clinical repository: Work with engaged repository stakeholders to develop an RFP targeting statewide repository solutions.<ul style="list-style-type: none">○ HIE Steering Committee○ Department of Vermont Health Access○ Agency of Digital Services○ VITL○ Near term (12-18 months)

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
<p>2.2 E-plans of care are interoperable and accessible by all relevant members of the care team, including mental health providers</p>	<p>Current State:</p> <p>Participating IMD facility treatment plans are interoperable and accessible by all relevant members of the care team because they are accessed and contributed to by multiple clinical staff members while in draft form in the shared drive. Plans are then refined, printed, signed and scanned into the patient’s electronic medical record. Hard copies remain on the units. Care plans in the patient’s electronic medical record can be shared with other providers outside the IMD via fax or Direct Secure Messaging.</p>
	<p>Future State:</p> <p>See responses to item 1 topics above for additional background. The HIT Roadmap provides an analysis of current functionality and future needs across multiple provider types, including mental health providers. Multiple tactics for achieving interoperability and the sharing of health information, including care plans, are identified across Vermont’s three-tier architecture of foundational services, exchange services, and end-user services. Sharing care plans is considered an end-user service supported by foundational services such as identity management and provider directory and exchange services such as interoperability. The HIT Roadmap includes a commitment to standards that support interoperability and alignment with federal initiatives such as TEFCA and the expansion of the FHIR data exchange standard. Enabling this architecture through standards supporting interoperability will ultimately expand the capacity to share care plans across disparate systems.</p> <p>Additionally, the new opt-out consent policy (see response to section 1.1 above) will support the sharing of care plan information in the VHIE. Vermont anticipates that once the opt-out policy is implemented in March of 2020 that 95% of Vermonters’ health information will be available for treating providers to access via Vermont’s HIE.</p>
	<p>Summary of Actions Needed:</p> <ul style="list-style-type: none"> • Implement the new opt-out consent policy March 1, 2020 (Owner: HIE Steering Committee and Consent Implementation Team) • Continue consent planning for sensitive information and information related to 42CFR Part 2 providers – near term 12-18 months (Owner: HIE Steering Committee and Consent Implementation Team)
<p>2.3 Medical records transition from youth-oriented systems of care to the adult behavioral health system through electronic communications</p>	<p>Current State:</p> <p>Vermont does not currently meet this HIT milestone.</p>
	<p>Future State:</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<p>Expand existing Vermont HIT Roadmap to include functionality that provides for medical records to transition from youth-oriented systems of care to the adult behavioral health system through electronic communications.</p> <p>Summary of Actions Needed: Medical records transition from one setting to another can be accommodated through the VHIE if the two settings have such a connection. Alternatively, Direct Secure Messaging can be employed, but Direct Secure Messaging may not satisfy a need to transition structured data into the target medical record system. It is important to note that Vermont’s HIE strategies are focused on connecting the entire system of care and ensuring that appropriate, treating providers have access to a patient’s health data to support the provision of high-quality care. While the state is dedicated to addressing specific data exchange issues, such as sharing of SUD and mental health data, it also understands that sharing across the health care system is essential as patients are people with changing lives and needs, who are not necessarily defined by the type of care or the institution that serves them at one point in time.</p> <p>Additional information: Several elements of the HIT Roadmap address different aspects of the solution called for in 2.3, including notification services, EHR integration, care coordination tools (see discussion in 1.1 above), data extraction and aggregation, interoperability, identity management, and consent management. The HIE Steering Committee has overall responsibility for the planning work associated with each of these topics, with other entities sharing responsibility in different combinations depending on the topic. In all instances the planning work is near term (12-18 months).</p>
<p>2.4 Electronic care plans transition from youth-oriented systems of care to the adult behavioral health system through electronic communications</p>	<p>Current State: Vermont does not currently meet this HIT milestone.</p> <p>Future State: Expand existing Vermont HIT Roadmap to include functionality that provides for the transitioning of electronic care plans from youth-oriented systems of care to the adult behavioral health system through electronic communications.</p> <p>Summary of Actions Needed: See summary of action needed in item 2.5 below. These comments also apply to planning for the transitioning of electronic care plans from youth-oriented systems of care to the adult behavioral health system through electronic communication.</p>
	<p>Current State:</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
<p>2.5 Transitions of care and other community supports are accessed and supported through electronic communications</p>	<p>For electronic communications for transitions of care to community providers, Medical records departments scan and fax clinical information to community providers. Direct access to the electronic medical record is restricted almost exclusively to internal employees at each facilities. Prescribers have the ability to prescribe electronically to remote pharmacies during the patient discharge process.</p> <p>Future State: Expand HIT Roadmap to ensure alignment across facilities. The HIE Technical Roadmap supports further development of notifications, and the utilization of notification services throughout the HIE network in Vermont. The HIE received IAPD funds to support this work through 2021.</p> <p>Summary of Actions Needed: The HIE Technical Roadmap includes planning for improvements in notification services. In particular, transitions of care can be supported by ADT (Admit, Discharge, Transfer) notifications and care summaries and medication lists can be made available in the VITL Access portal. There are financial barriers to accessing the provider portal and this may be a burden to community support organizations. Vermont’s HIE has traditionally offered services through Patient Ping, an event notification system. Planning to expand technical solutions for notifications is a near term (12-18 month) activity in the roadmap.</p> <p>Additional information: See the additional comments in the Summary of Actions Needed in item 2.3 above, including comments on responsibility and time frames. Those comments apply to item 2.5 as well.</p>
<p>Consent - E-Consent (42 CFR Part 2/HIPAA) (Section 3)</p>	
<p>3.1 Individual consent is electronically captured and accessible to patients and all members of the care team, as applicable, to ensure seamless sharing of sensitive health care information to all relevant parties consistent with applicable law and regulations (e.g., HIPAA, 42 CFR part 2 and state laws)</p>	<p>Current State: The VHIE currently captures health information regulated under HIPAA. Several existing workflows provided by VITL for HIPAA covered health care data are:</p> <ul style="list-style-type: none"> • NVRH HL7 Consent Process, • UVMMC HL7 Consent Process, • All HL7 General Consent Setting Process, • All VHIE for patient search, including “breaking the glass”, • Meditech Expanse – External Application, • VCCI Query Process, • Setting VITLAccess Consent Process, and • Changing Existing VITLAccess Consent Process.

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<p>VITL currently cannot segregate 42 CFR Part 2 data and thus restricts data flow so that it does not include 42 CFR Part 2 provider data into the VHIE. VITL does not currently receive information or collect consent from designated 42 CFR Part 2 programs. Note: the Collaborative Services Project is on track to put in place the foundational tools necessary to segregate SUD data from the broader health care data set in 2020.</p> <p>Further, the current consent policy in Vermont is opt-in, but will change on March 1, 2020 to opt-out. The understanding is that 42 CFR Part 2 consent will remain opt-in and granular consent will be necessary. In CY20, VITL will develop procedures, use cases and workflows to protect and allow access to this sensitive data. See additional comments in the “Summary of Actions Needed” section below.</p> <p>Pilot projects conducted under the ONC’s Data Segmentation for Privacy Initiative (DS4P) have illustrated ways that the 42 CFR Part 2 prohibition on re-disclosure notice can be transmitted, along with health information, when a patient has consented to its disclosure. For an example, an individual may view a 5-minute video Web Site Disclaimers or 14-minute video Web Site Disclaimers of the U.S. Department of Veterans Affairs (VA)/Substance Abuse and Mental Health Services Administration (SAMHSA) demonstration project.</p> <p>Future State: Utilize above workflows to inform the future state process. Additional activities include:</p> <ul style="list-style-type: none"> • Aggregating steps in HL7 ALL and facility specific HL7 diagrams, • Utilizing and restructuring the VHIE internal process after policy options are made; and • Utilizing Vermont Chronic Care Initiative (VCCI)²⁶ diagrams to create a template that will inform other parties of a patient’s consent choice. <p>Summary of Actions Needed: Begin to build future state use case/workflow diagrams based on process options. Also consider developing and providing guidance materials to providers/health care facilities on best practice workflows. Additional activities include:</p> <ul style="list-style-type: none"> • A new opt-out consent policy goes into effect in March 2020 and there will be mechanisms established in the VHIE to ensure that a patient’s consent to share information in the VHIE is known and maintained. When a query is made

²⁶ VCCI is an integrated model of case management supports and services provided by a staff of nurses, licensed and unlicensed social workers and substance abuse professionals with clinical, mental health, and substance abuse experience and education. A major objective of the case managers is to help a member stabilize.

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<p>for sensitive data, and the provider has a treating relationship with the patient, consent will still be verified before any information is shared.</p> <ul style="list-style-type: none"> • The opt-out consent policy will initially be implemented as an all-in or all-out choice. The HIE Technology Roadmap identifies an activity to determine how to manage sensitive information, including information associated with 42 CFR Part 2 providers, so that selective consent choices can be made for sensitive information. This is a near term planning activity with a 12-18 month timeline. • The HIE Steering Committee and the Consent Implementation Team are responsible for planning and implementing the consent policy in the time frames identified here.
<p>Interoperability in Assessment Data (Section 4)</p>	
<p>4.1 Intake, assessment and screening tools are part of a structured data capture process so that this information is interoperable with the rest of the HIT ecosystem</p>	<p>Current State: Intake: The Electronic Health Record (EHR) software application “Evident” or “Thrive” by CPSI includes a registration module where patient intake information is input by admissions staff. Any information known about the patient, such as name, personal information, address, condition, family, and insurance is entered into the system.</p> <p>Intake/assessment: The admitting doctor fills out an admissions template in the physicians’ side of the EHR software (“Thrive UX”). The medical director requests changes to the admissions template as needed, such as compliance with Joint Commission requirements. Point of care (POC, nursing) also has their own documentation for an initial assessment via a flowsheet.</p> <p>All clinical staff have ways to continue documenting their patient assessments in the EHR during the patients’ stays and upon discharge. Doctors and social workers have a selection of templates to guide their input into patient care issues in the Thrive UX application. This can include progress notes, medical consults, certificates of need for involuntary procedures, discharge, etc. Nursing staff, dietary staff, and recovery staff may document in the Thrive POC application via flowsheets (nursing) and e-forms (nursing, dietary, recovery). However, while doctors/social workers in Thrive UX may view Thrive POC documentation and nursing/dietary/recovery staff in Thrive POC may view the Thrive UX documentation, there is no cross-platform interactivity.</p> <p>Future State: Integrate tools into part of a structured data capture process so that this information is interoperable with the rest of the HIT ecosystem.</p> <p>Summary of Actions Needed: This is currently under assessment. Implementation would follow based on the assessment study and analysis.</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
Electronic Office Visits – Telehealth (Section 5)	
<p>5.1 Telehealth technologies support collaborative care by facilitating broader availability of integrated mental health care and primary care</p>	<p>Current State: The mental health care system in Vermont is a public-private collaboration between DMH and regional Designated Agencies. A unified electronic health record or case/care management system between state and private partners has not been established. Each entity of the system of care uses proprietary applications to coordinate and manage a client/patient’s care.</p> <p>The EHR for DMH has telehealth capability. Therapeutic and counselling services for individuals in the custody of DMH are provided on-site. Psychiatric specialists (DMH and Designated Agencies) also interview and assess their patients on-site. If a patient is to be discharged and referred to a Designated Agency, coordination and transition is done by telephone. Telehealth services are used through an independent application to consult non-psychiatric specialists (internal medicine, neurology, endocrinology, podiatry, etc.) and interact with the legal/justice system.</p> <p>Future State: Broader use of telehealth technologies leading to improved statewide mental health and primary care access.</p> <p>Summary of Actions Needed: VITL provides HIE services to the State. Those services include data extraction and access to/from providers for continuity of care, and data aggregation for population health and analytics. Currently, no sensitive data (including mental health data) is part of VITL’s scope of work due to technical limitations. However, the state & VITL are currently planning to expand VT HIE services to include 42 CFR part 2 data that will cover mental health data exchange and aggregation allowing care coordination and collaboration. Planning and policy creation for this effort will start in 2020.</p> <p>A new identity management solution currently in development will ensure the correct association of sensitive data to a patient, and will help to ensure the proper patient match when a patient’s provider seeks to access the information – part of services being implemented in January 2021.</p> <p>A new opt-out consent policy goes into effect in March 2020 and there will be mechanisms established in the VHIE to ensure that a patient’s consent to share information in the VHIE is known and maintained. When a query is made for sensitive data, and the provider has a treating relationship with the patient, consent will still be verified before any information is shared. The opt-out consent policy will initially be implemented as an all-in or all-out choice. The HIE</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<p>Technology Roadmap identifies an activity to determine how to manage sensitive information, including information associated with 42 CFR Part 2 providers, so that selective consent choices can be made for sensitive information.</p> <p>The consent policy implementation is the responsibility of the HIE Steering Committee and the consent policy implementation team. The identity management solution is being implemented by VITL.</p>
Alerting/Analytics (Section 6)	
<p>6.1 The state can identify patients that are at risk for discontinuing engagement in their treatment, or have stopped engagement in their treatment, and can notify their care teams in order to ensure treatment continues or resumes (Note: research shows that 50% of patients stop engaging after 6 months of treatment²⁷)</p>	<p>Current State: Vermont does not currently meet this HIT milestone.</p>
	<p>Future State: Expand existing Vermont HIT Roadmap to include functionality that identifies patients that are at risk for discontinuing engagement in their treatment, or have stopped engagement in their treatment, and can notify their care teams in order to ensure treatment continues or resumes. OneCare Vermont is working with AHS to obtain SDOH data to inform risk stratification for patients identified as potentially at-risk. SDOH data will inform care teams of related risk factors..</p>
	<p>Summary of Actions Needed: A key objective in the HIT Roadmap is to share appropriate information with a patient’s care team to support care management and care coordination. Related to this objective is a near term activity of identifying and evaluating care coordination tools. Functionality described here in section 6.1 requires analysis of data in care coordination tools to determine when to generate a notification of a patient at risk, based on rules that may have to be added to the tools. For Designated Agencies who may be acquiring new EHRs or adding functions to existing EHRs there may be an opportunity to include a notification solution as indicated here in section 6.1. VCCI, a component of Vermont Medicaid, has recently launched a new initiative whereby staff reach out to new Medicaid beneficiaries to ensure they understand their benefits and link them with a primary care home.</p>

²⁷ Interdepartmental Serious Mental Illness Coordinating Committee. (2017). *The Way Forward: Federal Action for a System That Works for All People Living With SMI and SED and Their Families and Caregivers*. Retrieved from https://www.samhsa.gov/sites/default/files/programs_campaigns/ismicc_2017_report_to_congress.pdf

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	<p>In summary, the possible steps described here are planning considerations to be determined in the near-term timeframe of 12-18 months.</p> <p>The HIE Steering Committee is responsible for ensuring near term planning activities.</p>
<p>6.2 Health IT is being used to advance the care coordination workflow for patients experiencing their first episode of psychosis</p>	<p>Current State: Vermont does not currently meet this HIT milestone.</p> <p>Future State: Expand existing Vermont HIT Roadmap to ensure that Health IT is being used to advance the care coordination workflow for patients experiencing their first episode of psychosis. The primary barrier to be addressed is access to necessary health information to ensure timely and appropriate care coordination actions. Access to the information requires a technical solution to query and view the necessary information and obtaining consent to view the information across all providers involved in the patient’s care.</p> <p>Summary of Actions Needed: See response to item 6.1 above. The same planning activities that will consider care coordination in the context of notifications can include planning for advancing care coordination workflow for patients experiencing their first episode of psychosis. This is an identified near term, 12-18-month, activity.</p>
<p>Identity Management (Section 7)</p>	
<p>7.1 As appropriate and needed, the care team has the ability to tag or link a child’s electronic medical records with their respective parent/caretaker medical records</p>	<p>Current State: Vermont does not currently meet this HIT milestone.</p> <p>Future State: Expand existing Vermont HIT Roadmap to include functionality for the care team to tag or link a child’s electronic medical records with their respective parent/caretaker medical records.</p> <p>Summary of Actions Needed: The VHIE has an active project to implement a new identity management system which will establish a universal identity key for each person with records in the VHIE. That functionality will be active in January 2021. However, relating one individual’s universal identity key with another’s introduces another level of complexity, which is not currently anticipated. Records can be tagged by adding parental or caretaker relationship information as demographic data in the health record, which can then be queried by field name. In addition to implementing new identity</p>

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-22-2019

Prompts	Summary
	management tools, the state will determine the feasibility of using existing fields in EHR records to tag relationships. This can be incorporated into current planning activities for identity management (including a patient relationship directory) in the roadmap’s tactical plan, as a near term action (12-18 months).
7.2 Electronic medical records capture all episodes of care, and are linked to the correct patient	Current State: All participating SMI IMD facilities maintain electronic records that capture all episodes of care at their facilities and are linked to the correct patient. Other providers who have seen or will see the patient capture episodes of care in their own systems. EHR systems have functionality to identify the patients with records in individual EHR systems.
	Future State: Maintain current EMR functionality as described in the current state. As new identity management tools become available through the VHIE, match patients to ensure that patient records in different EHR systems are correctly associated with the same individual. Until such time as sensitive data is captured in a repository and consent to share sensitive information is resolved by both policy and technology, the sharing of information will occur through requests from facility to facility. Information requests can be satisfied through fax or attachments to Direct Secure Messages.
	Summary of Actions Needed: Participate in requirements and planning for the new identity management solution. Begin utilizing the new identity management functionality to match patients when the tools are available in January 2021.

Attachment P

Medicaid Section 1115 SMI/SED Demonstration Implementation Plan

Vermont 11-W-00194/1

December 5, 2019

Submitted on 11-21-2019

Section 3: Relevant documents

Please provide any additional documentation or information that the state deems relevant to successful execution of the implementation plan. This information is not meant as a substitute for the information provided in response to the prompts outlined in Section 2. Instead, material submitted as attachments should support those responses.

1. Title Page for the State’s SMI/SED Demonstration or SMI/SED Components of Broader Demonstration

The state should complete this Title Page as part of its SMI/SED 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.

State	Vermont
Demonstration name	Global Commitment to Health
Approval date for demonstration	January 1, 2017
Approval period for SMI/SED	January 1, 2020 – December 31, 2021
Approval date for SMI/SED, if different from above	December 5, 2019
Implementation date of SMI/SED, if different from above	January 1, 2020
SMI/SED (or if broader demonstration, then SMI/SED -related) demonstration goals and objectives	<p>During the demonstration period, the state seeks to achieve the following SMI/SED goals:</p> <ol style="list-style-type: none"> 1. Reduced utilization and lengths of stay in EDs among Medicaid beneficiaries with SMI or SED while awaiting mental health treatment in specialized settings; 2. Reduced preventable readmissions to acute care hospitals and residential settings; 3. Improved availability of crisis stabilization services including services made available through call centers and mobile crisis units, intensive outpatient services, as well as services provided during acute short-term stays in residential crisis stabilization programs and psychiatric hospitals and residential treatment settings throughout the state; 4. Improved access to community-based services to address the chronic mental health care needs of beneficiaries with SMI or SED including through increased integration of primary and behavioral health care; and 5. Improved care coordination, especially continuity of care in the community following episodes of acute care in hospitals and residential treatment facilities.

2. Proposed Modifications to SMI/SED Narrative Information on Implementation, by Milestone or Reporting Topic

Summary of proposed modification	Related metric (if any)	Justification for modification
1. Ensuring Quality of Care in Psychiatric Hospitals and Residential Settings (Milestone 1)		
<p><i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SMI/SED Monitoring Report Template (Narrative Information on Implementation)</i></p> <p><i>EXAMPLE</i> Additional topic of interest</p>		<p><i>Summarize how the proposed modification will alter reporting relative to the SMI/SED Monitoring Report Template and why this modification is needed.</i></p> <p><i>EXAMPLE</i> In addition to reporting on the requested information, the state plans to report on progress on X implementation activity not currently listed in the report template. The state will add this activity as a new row to the “Narrative Information on Implementation” table in Part A of its Monitoring Reports.</p>
[Add rows as needed]		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
2. Improving Care Coordination and Transitions to Community-Based Care (Milestone 2)		
<p><i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SMI/SED Monitoring Report Template (Narrative Information on Implementation)</i></p>		
[Add rows as needed]		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		

Summary of proposed modification	Related metric (if any)	Justification for modification
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
3. Increasing Access to Continuum of Care, Including Crisis Stabilization Services (Milestone 3)		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SMI/SED Monitoring Report Template (Narrative Information on Implementation)</i>		
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
4. Earlier Identification and Engagement in Treatment, Including Through Increased Integration (Milestone 4)		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SMI/SED Monitoring Report Template (Narrative Information on Implementation)</i>		
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		

Summary of proposed modification	Related metric (if any)	Justification for modification
5. SMI/SED Health Information Technology (Health IT)		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SMI/SED Monitoring Report Template (Narrative Information on Implementation)</i>		
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
6. Other SMI/SED-related Metrics		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SMI/SED Monitoring Report Template (Narrative Information on Implementation)</i>		
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		

Summary of proposed modification	Related metric (if any)	Justification for modification
7. Annual Assessment of the Availability of Mental Health Providers		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SMI/SED Monitoring Report Template (Narrative Information on Implementation)</i>		
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
8. SMI/SED Financing Plan		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SMI/SED Monitoring Report Template (Narrative Information on Implementation)</i>		
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		

Summary of proposed modification	Related metric (if any)	Justification for modification
9. Budget Neutrality		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SMI/SED Monitoring Report Template (Narrative Information on Implementation)</i>		Budget Neutrality is reported in Section V of the GC Quarterly/Annual Report.
<i>[Add rows as needed]</i>		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
10. SMI/SED-Related Demonstration Operations and Policy		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SMI/SED Monitoring Report Template (Narrative Information on Implementation)</i>		
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		

Summary of proposed modification	Related metric (if any)	Justification for modification
11. SMI/SED Demonstration Evaluation Update		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SMI/SED Monitoring Report Template (Narrative Information on Implementation)</i>		SMI/SED Demonstration Evaluation Update is reported in Section IX of the GC Quarterly/Annual Report.
[Add rows as needed]		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
12. Other Demonstration Reporting		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SMI/SED Monitoring Report Template (Narrative Information on Implementation)</i>		
[Add rows as needed]		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		

Summary of proposed modification	Related metric (if any)	Justification for modification
13. Notable State Achievements and/or Innovations		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SMI/SED Monitoring Report Template (Narrative Information on Implementation)</i>		Notable State Achievements and/or Innovations is reported in Section III of the GC Quarterly/Annual Report.
[Add rows as needed]		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SMI/SED Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		

3. Annual Assessment of the Availability of Mental Health Providers Reporting

The state will use the following time period for reporting of its Annual Assessment of the Availability of Mental Health Providers:

The state will use data as of December 1 to conduct its Annual Assessment of Availability of Mental Health Providers.

4. Acknowledgement of Budget Neutrality Reporting

The state has reviewed the Budget Neutrality workbook provided by the project officer and understands the expectations for quarterly and annual monitoring reports. The state will provide the requested budget neutrality information (no modifications).

5. Retrospective reporting

If a state's monitoring protocol is approved after its first quarterly monitoring report submission date, the state should report data to CMS retrospectively for any prior quarters of SMI/SED demonstration implementation. States are expected to submit retrospective metrics data in the state's second monitoring report submission after monitoring protocol approval or propose an alternative plan for reporting retrospectively on its SMI/SED 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 the state's demonstration through the end of the current reporting period. The state should report this information in Part B of its report submission (Table 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 metrics data (for example, unlike other monitoring report submissions, the state is not required to describe all metrics changes (+ or) greater than 2 percent). Rather, the assessment is an opportunity for states to provide context for its retrospective metrics data, to support CMS's review and interpretation. For example, consider a state that submits data showing an increase in the utilization of telehealth services for mental health (metric #15) over the course of the retrospective reporting period. The state may decide to highlight this trend to CMS in Part B of its report (under Milestone 3) by briefly summarizing the trend and providing context that during this period, the state implemented a grant to improve access to mental health treatment in rural areas through the use of telemedicine.

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

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

6. Reporting SMI Demonstration Metrics and Narrative Information

The state has completed the table below according to the guidance in Appendix A of the instructions document and attests to reporting metrics and narrative information in its quarterly and annual reports as described.

The state has reviewed Appendix A of the instructions document and completed the table below with the following deviations: *Insert narrative description of proposed changes to reporting. State should provide justification for any proposed deviation.*

Table A.1 below outlines how Vermont can report its SMI/SED metrics and narrative information to align with CMS guidance.

Table A.1. Reporting schedule for Vermont metrics and narrative information

Dates of reporting quarter	Broader 1115 DY (if applicable) *	SMI/SED DY	Report due (per STCs schedule)	Measurement period associated with SMI/SED information in report, by reporting category
January 1, 2020 – March 31, 2020	DY4Q1	DY1Q1	5/30/2020	<ul style="list-style-type: none"> Narrative information: SMI/SED DY1Q1 Grievances and appeals: SMI/SED DY1Q1 Other monthly and quarterly metrics: None Annual metrics that are established quality measures: None Other annual metrics: None
April 1, 2020 – June 30, 2020	DY4Q2	DY1Q2	8/29/2020	<ul style="list-style-type: none"> Narrative information: SMI/SED DY1Q2 Grievances and appeals: SMI/SED DY1Q2 Other monthly and quarterly metrics: SMI/SED DY1Q1 Annual metrics that are established quality measures: None Other annual metrics: None
July 1, 2020 – September 30, 2020	DY4Q3	DY1Q3	11/29/2020	<ul style="list-style-type: none"> Narrative information: SMI/SED DY1Q3 Grievances and appeals: SMI/SED DY1Q3 Other monthly and quarterly metrics: SMI/SED DY1Q2 Annual metrics that are established quality measures: None Other annual metrics: None
October 1, 2020 – December 31, 2020	DY4Q4	DY1Q4	04/1/2021	<ul style="list-style-type: none"> Narrative information: SMI/SED DY1Q4 Grievances and appeals: SMI/SED DY1Q4 Other monthly and quarterly metrics: SMI/SED DY1Q3 Annual metrics that are established quality measures: None** Other annual metrics: None
January 1, 2021 – March 31, 2021	DY5Q1	DY2Q1	05/30/2021	<ul style="list-style-type: none"> Narrative information: SMI/SED DY2Q1 Grievances and appeals: SMI/SED DY2Q1 Other monthly and quarterly metrics: SMI/SED DY1Q4

Medicaid Section 1115 SMI/SED Demonstration Monitoring Protocol – Part B
 Vermont Global Commitment to Health
 Resubmitted on October 5, 2020

Dates of reporting quarter	Broader 1115 DY (if applicable) *	SMI/SED DY	Report due (per STCs schedule)	Measurement period associated with SMI/SED information in report, by reporting category
				<ul style="list-style-type: none"> Annual metrics that are established quality measures: None Other annual metrics: SMI/SED DY1 (calculated for DY1)
April 1, 2021 – June 30, 2021	DY5Q2	DY2Q2	08/29/2021	<ul style="list-style-type: none"> Narrative information: SMI/SED DY2Q2 Grievances and appeals: SMI/SED DY2Q2 Other monthly and quarterly metrics: SMI/SED DY2Q1 Annual metrics that are established quality measures: SMI/SED DY1 (calculated for CY2020) Other annual metrics: None
July 1, 2021 – September 30, 2021	DY5Q3	DY2Q3	11/29/2021	<ul style="list-style-type: none"> Narrative information: SMI/SED DY2Q3 Grievances and appeals: SMI/SED DY2Q3 Other monthly and quarterly metrics: SMI/SED DY2Q2 Annual metrics that are established quality measures: None Other annual metrics: None
October 1, 2021 – December 31, 2021	DY5Q4	DY2Q4	04/1/2022	<ul style="list-style-type: none"> Narrative information: SMI/SED DY2Q4 Grievances and appeals: SMI/SED DY2Q4 Other monthly and quarterly metrics: SMI/SED DY2Q3 Annual metrics that are established quality measures: None** Other annual metrics: None

*Vermont’s SMI/SED demonstration was added to its broader 1115 demonstration by amendment at the start of the broader 1115 demonstration’s fourth demonstration year.

**Vermont reports its established quality measures in the second quarterly report following the annual report because its demonstration year ends on 12/31; this lag allows adequate time for claims runout and other data completeness issues, as well as time to incorporate annual measure steward updates to specifications.

Attachment Q

What follows in this attachment are the SM/SED Definition Tabs and the Planned Metric tabs of the Monitoring Protocol (Part A) workbook. This workbook is also available in full spreadsheet form on Medicaid.gov

Medicaid Section 1115 SM/SED Demonstration Protocol - SMI & SED definitions

State Vermont

Demonstration Name Global Commitment to Health

Demonstration Year (DY)

Calendar Dates for DY

Reporting Period [Enter Reporting Period] (Format: Q1, Q2, Q3, Q4)

Calendar Dates for Reporting Period [Enter Calendar Dates for Reporting Period (Format: MM/DD/YYYY - MM/DD/YYYY)

Submitted on [Enter Date] (Format: MM/DD/YYYY)

Narrative description of the SM/SED demonstration population

Adults age 21 or older with serious mental illness or children under the age of 21 with a serious emotional disturbance living within the state.

	Serious Mental Illness (SMI)	Serious Emotional Disturbance (SED)
Narrative description of how the state defines the population for purposes of monitoring (including included ages, diagnosis groups and associated service use requirements)	<i>Individuals over 21 years of age with at least one acute inpatient claim/encounter at the Brattleboro Retreat or Vermont Psychiatric Care Hospital (VPCH) regardless of diagnosis during the measurement period or 11 months prior.</i>	<i>Individuals under the age of 21 years of age with at least one acute inpatient claim/encounter at the Brattleboro Retreat or Vermont Psychiatric Care Hospital (VPCH) regardless of diagnosis during the measurement period or 11 months prior.</i>
Codes used to identify population^b	<i>State-specified codes: The state plans to use provider billing codes for Brattleboro Retreat and Vermont Psychiatric Care Hospital to identify the population</i>	<i>State-specified codes: The state plans to use provider billing codes for Brattleboro Retreat and Vermont Psychiatric Care Hospital to identify the population</i>
<i>States may use ICD-10 diagnosis codes or state-specific treatment, diagnosis, or other types of codes to identify the population. When applicable, states should supplement ICD-10 codes with state-specific codes.</i>		
Procedure (e.g., CPT, HCPCS) or revenue codes used to identify/define service requirements^b	<i>State-specified codes: The state plans to use DRG assignment and the type of bill to identify inpatient psychiatric care</i>	<i>State-specified codes: The state plans to use DRG assignment and the type of bill to identify inpatient psychiatric care</i>
<i>If the state is not using procedure or revenue codes, the state should include the data source(s) (e.g., state-specific codes) used to identify/define service requirements.</i>		

