

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



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## State Demonstrations Group

Al Gobeille  
Secretary  
Vermont Agency of Human Services  
280 State Drive  
Waterbury, VT 05671

SEP 17 2019

Dear Secretary Gobeille:

Thank you to you and your staff for your work on the substance use disorder (SUD) monitoring protocol, which is a component of the state's section 1115(a), titled "Vermont Global Commitment to Health" (Project No. 11-W-00194/1). The draft SUD monitoring protocol submitted to Centers for Medicare & Medicaid Services (CMS) August 9, 2019 has been found to fulfill the requirements set forth in the Special Term and Conditions (STC), section IX-and State Medicaid Director Letter SMD # 17-003, "Strategies to Address the Opioid Epidemic."

The SUD monitoring protocol is approved for the period starting with the date of this approval letter through December 31, 2021 – and is hereby incorporated into the demonstration STCs as Attachment O (see attached). Per 42 CFR 431.424(c), the approved SUD monitoring protocol may now be posted to your state's Medicaid website.

If you have any questions, please contact your CMS project officer, Mr. Eli Greenfield. Mr. Greenfield is available to answer any questions concerning your section 1115(a) demonstration and his contact information is as follows:

Centers for Medicare & Medicaid Services Center for Medicaid & CHIP Services  
Mail Stop: S2-25-26  
7500 Security Boulevard  
Baltimore, MD 21244-1850  
Telephone: 410-786-6157  
E-mail: [eli.greenfield@cms.hhs.gov](mailto:eli.greenfield@cms.hhs.gov)

Official communication regarding official matters should be simultaneously sent to Mr. Greenfield and Mr. Francis McCullough, Director, Division of Medicaid Field Operations East. Mr. McCullough's contact information is as follows:

Mr. Francis McCullough  
Director, Division of Medicaid Field Operations East Centers for Medicare & Medicaid  
Services  
80 I Market Street, Suite 9400  
Philadelphia, PA 19107-3134  
Telephone: (215) 861-4157  
E-mail: [Francis.McCullough@cms.hhs.gov](mailto:Francis.McCullough@cms.hhs.gov)

We look forward to our continued partnership on the Vermont Global Commitment to Health  
section 1115(a) demonstration.

Sincerely,



Angela D. Garner  
Director  
Division of System Reform Demonstrations

Enclosure

cc: Francis McCullough, Director, Division of Medicaid Field Operations East  
Gilson DaSilva, CMS State Lead, Regional Operations Group

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

<b>State</b>	Vermont
<b>Demonstration Name</b>	Global Commitment to Health
<b>Approval Date</b>	SUD: June 6, 2018
<b>Approval Period</b>	SUD: July 1, 2018 – December 31, 2021
<b>SUD (or if broader demonstration, then SUD Related) Demonstration Goals and Objectives</b>	<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"> <li>1. Increased rates of identification initiation, and engagement in treatment;</li> <li>2. Increase adherence to and retention in treatment;</li> <li>3. Reductions in overdose deaths, particularly those due to opioids;</li> <li>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;</li> <li>5. Fewer readmissions to the same or higher level of care where the readmission is preventable or medically inappropriate; and</li> <li>6. Improved access to care for physical health conditions among beneficiaries.</li> </ol>

## 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
<b>1. Assessment of Need and Qualification for SUD Services</b>		
		<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).		
<b>2. Access to Critical Levels of Care for OUD and other SUDs (Milestone 1)</b>		
<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>		
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<b>3. Use of Evidence-based, SUD-specific Patient Placement Criteria (Milestone 2)</b>		
<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>
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<b>4. Use of Nationally Recognized SUD-specific Program Standards to Set Provider Qualifications for Residential Treatment Facilities (Milestone 3)</b>		
<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>		
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<b>5. Sufficient Provider Capacity at Critical Levels of Care including for Medication Assisted Treatment for OUD (Milestone 4)</b>		
<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>
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<b>6. Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and OUD (Milestone 5)</b>		
<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>
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<b>7. Improved Care Coordination and Transitions between Levels of Care (Milestone 6)</b>		
<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>
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<b>8. SUD Health Information Technology (Health IT)</b>		

<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>
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<b>9. Other SUD-Related Metrics</b>		
<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>
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<b>10. Budget Neutrality</b>		
<i>Provide a brief description of any changes or modifications the state</i>		<i>No modifications planned</i>



<i>expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		
<i>[Add rows as needed]</i>		
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<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).		
<b>11. SUD-Related Demonstration Operations and Policy</b>		
<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>		
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<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).		
<b>12. SUD Demonstration Evaluation Update</b>		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the</i>		<i>No modifications planned</i>

<i>expectations described in the SUD 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 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).		
<b>13. Other Demonstration Reporting</b>		
<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).		
<b>14. Notable State Achievements and/or Innovations</b>		
<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

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"> <li>Narrative information for SUD DY2 Q1</li> <li>Metrics based on non-claims administrative data for SUD DY2 Q1</li> <li>Monthly and quarterly metrics for SUD DY2 Q4</li> <li>Annual CMS-constructed and state-identified metrics (calculated for CY 2018)</li> <li>Annual metrics that are established quality measures (calculated for CY 2018)</li> </ul>
April 1, 2019 – June 30, 2019	DY3 Q2	DY2 Q2	8/29/2019	<ul style="list-style-type: none"> <li>Narrative information for SUD DY2 Q2</li> </ul>

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

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				<ul style="list-style-type: none"> <li>• Metrics based on non-claims administrative data for SUD DY2 Q2</li> <li>• Monthly and quarterly metrics for SUD DY2 Q1</li> </ul>
July 1, 2019 – September 30, 2019	DY3 Q3	DY2 Q3	11/29/2019	<ul style="list-style-type: none"> <li>• Narrative information for SUD DY2 Q3</li> <li>• Metrics based on non-claims administrative data for SUD DY2 Q3</li> <li>• Monthly and quarterly metrics for SUD DY2 Q2</li> </ul>
October 1, 2019 – December 31, 2019	DY3 Q4	DY2 Q4	4/1/2020	<ul style="list-style-type: none"> <li>• Narrative information for SUD DY2 Q4</li> <li>• Metrics based on non-claims administrative data for SUD DY2 Q4</li> <li>• Monthly and quarterly metrics for SUD DY2 Q3</li> </ul>
January 1, 2020 – March 31, 2020	DY4 Q1	DY3 Q1	5/30/2020	<ul style="list-style-type: none"> <li>• Narrative information for DY3 Q1</li> <li>• Metrics based on non-claims administrative data for DY3 Q1</li> <li>• Monthly and quarterly metrics for SUD DY2 Q4</li> <li>• Annual CMS-constructed and state-identified metrics (calculated for SUD DY 2)</li> <li>• Annual metrics that are established quality measures (calculated for CY 2019)</li> </ul>

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.

\*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.