Medicaid and CHIP State Plan, Waiver, and Program Submissions

PRA Disclosure Statement - This information is being collected to assist the Centers for Medicare & Medicaid Services in program monitoring of Medicaid Section 1115 Substance Use Disorder Demonstrations. This mandatory information collection (42 CFR § 431.428) will be used to support more efficient, timely and accurate review of states' SUD 1115 demonstrations monitoring reports submissions to support consistency of monitoring and evaluation of SUD 1115 Demonstrations, increase in reporting accuracy, and reduce timeframes required for monitoring and evaluation. Under the Privacy Act of 1974 any personally identifying information obtained will be kept private to the extent of the law. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid Office of Management and Budget (OMB) control number. The OMB control number for this project is **0938-1148 (CMS-10398 #57)**." If you have comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to: CMS, 7500 Security Boulevard, Attn: PRA Reports Clearance Officer, Mail Stop C4-26-05, Baltimore, Maryland 21244-1850.

1. Title Page for the State's SUD Demonstration or SUD Components of Broader Demonstration

The state should complete this Transmittal Title Page at the beginning of a demonstration and submit as the title page of all SUD Monitoring Reports. The content of this transmittal table should stay consistent over time.

State	Vermont
Demonstration Name	Global Commitment to Health 1115 Demonstration
Approval Date	June 28, 2022
Approval Period	July 1, 2022, to December 31, 2027
SUD (or if broader demonstration, then SUD Related) Demonstration Goals and Objectives	 Increase rates of identification, initiation, and engagement in treatment. Improve access to care for physical health conditions among beneficiaries. Increase adherence to and retention in treatment. Reduce overdose deaths, particularly those due to opioids. Reduce utilization of emergency department and inpatient hospital settings for treatment where the utilizationis preventable or medically inappropriate through improved access to other continuum of care services. Reduce readmissions to the same or higher level of care where the readmission is preventable or medically inappropriate.

2. Executive Summary

The executive summary should be reported in the fillable box below. This executive summary is intended for summary level information only. The recommended word count is 500 words or less.

The Division of Substance Use Programs (DSU) has identified leads for the new projects authorized by the recently approved waiver, scheduled for January 1, 2025, implementation:

- Expanded eligibility group for people with a SUD diagnosis (i.e., Community Intervention and Treatment or CIT)
- Recovery services provided directly to people will be eligible to be reimbursed by Medicaid
- Services provided in recovery housing will be eligible to be reimbursed by Medicaid
- Services provided in withdrawal management programs will be eligible to be reimbursed by Medicaid

A series of planning sessions have been conducted for the expanded eligibility group that addressed topics such as financial and clinical eligibility, application/enrollment processing, coverage, reimbursement, and outreach. The design document is in the process of being finalized.

All ASAM levels of care, including medications for opioid use disorder (MOUD), were available. Treatment providers continued to provide telemedicine, where appropriate.

DSU's Substance Use Disorder Treatment Standards and corresponding compliance assessment tool were effective January 1, 2020, and continue to be used on site visits.

DSU and the DVHA Payment Reform team are awaiting approval from CMS regarding the incentives for a value-based payment model for residential programs to align with its All-Payer Model Agreement with CMS.

From 1/1/23-3/31/23, VT Helplink, DSU centralized intake and resource center, received 324 calls and 9,535 website visits. During 2022, VT Helplink received a total of 1,181 calls and 29,485 website visits. From 1/1/23-3/31/23, 15 unique treatment providers locations offered over 450 hours of appointment time via VT Helplink. A VT Helplink marketing booster campaign ran 2/20/23-4/2/23. This campaign resulted in over 280,000 clicks, views, and engagements with VT Helplink and 5.8 million impressions. The Substance Misuse Prevention Oversight and Advisory Council (SMPC) was established within the Vermont Department of Health and addresses all substances of misuse. The SMPC has three goals: 1) Increase protective factors and build resilience and feelings of connectedness in Vermont communities, across all ages, cultures, and socioeconomic conditions; 2) Decrease risk factors for substance use in Vermont for individuals of all ages, cultures, and socioeconomic conditions; 3) Increase efficiency and collaboration on prevention that is sustainable, scalable, and equitable. The SMPC submitted their <u>2023 Annual Report</u> to the Vermont Legislature which included both programmatic and policy recommendations focused on substance use prevention. Additional information on the SMPC can be found at: www.healthvermont.gov/SMPC

Vermont launched the Recovery Coaches in the Emergency Department Program on July 1, 2018, and it is now fully implemented in all 14 emergency departments in the state. Reporting for the number of unique Vermonters served through this program for 1/1/23-3/31/23 will be available in the Q2 report.

Vermont has assembled a Part 2 Data Governance Group and begun assessing the requirements needed to allow SUD data to be incorporated into the Vermont Health Information Exchange (VHIE).

3. Narrative Information on Implementation, by Reporting Topic

	Demonstration						
	year (DY) and	Related metric	Summary				
Prompts	quarter first	(if any)	Summary				
	reported	(II any)					
1.2 Assessment of Need and Oual	1.2 Assessment of Need and Qualification for SUD Services						
1.2.1 Metric Trends							
Discuss any relevant trends that	DY1 Q1						
the data shows related to							
assessment of need and							
qualification for SUD services. At							
a minimum, changes (+ or -)							
greater than two percent should							
be described.							
		5 Medicaid	5 This is the result of increases in SUD residential care, likely due to				
		Beneficiaries Treated	removal of Covid census limitations.				
		in an IMD for SUD					
		(+13.2%)					
[Add rows as needed]							
\Box The state has no metrics trends t	o report for this rep	orting topic.					
1.2.2 Implementation Update	1	1					
Compared to the demonstration							
design details outlined in the							
STCs and implementation plan,							
have there been any changes or							
does the state expect to make any							
changes to: A) the target							
population(s) of the							
demonstration? B) the clinical							
criteria (e.g., SUD diagnoses) that							

qualify a beneficiary for the demonstration?			
demonstration?		1	
Are there any other anticipated			
program changes that may impact			
metrics related to assessment			
of need and qualification for			
SUD services? If so, please			
describe these changes.			
\boxtimes The state has no implementation	update to report for	r this reporting topic.	
2.2 Access to Critical Levels of Ca	re for OUD and o	ther SUDs (Milestone 1)	
2.2.1 Metric Trends			
Discuss any relevant trends that the data shows related to assessment of need and qualification for SUD services. At a minimum, changes (+ or -) greater than two percent should be described.	DY1 Q1	6 Any SUD Treatment (-3.9%)	All healthcare services in Vermont have been impacted by the pre-COVID workforce shortage across licensed professionals (nursing, clinicians) and allied staff, which was exacerbated during the pandemic. Additionally, during COVID, Vermonters were not accessing healthcare services as robustly as they had been pre-pandemic and it may take a while for people to resume their pre-pandemic healthcare access patterns.
	DY1 Q1	7 Early Intervention (- 50.0%)	Services coded as early intervention have been consistently low (averaging one beneficiary per month) as most intervention services are provided through other mechanisms or funding.
[Add rows as needed]	DY1 Q1	8 Outpatient Service (+2.9%)	Vermonters may be beginning to seek out healthcare services again post- pandemic and individuals who may have had lapses/relapses/increases in problematic substance use during the pandemic may be starting to seek services.
	DY1 Q1	10 Residential	Individuals may be in need of higher levels of care due to not seeking care
	-	and Inpatient Services (+7.7%)	during the pandemic.
	DY1 Q1	11 Withdrawal	This may be the result of a change in the billing practice of a large
	~	Management (+7.0%)	provider.

	DV1 01	10.) (1: .:	
	DY1 Q1	12 Medication	This may be the result of a large provider billing issue.
		Assisted Treatment (-	
		5.7%)	
	DY1 Q1	23 Emergency	As Vermonters begin to access more appropriate levels of SUD treatment
		Department Usage (-	care after a reduction in access across the board of healthcare services
		12.7%)	during the COVID pandemic, this may be resulting in a reduction in the
			utilization of higher, less appropriate levels of care.
	DY1 Q1	24 Inpatient Stays (-	As Vermonters begin to access more appropriate levels of SUD treatment
		9.2%)	care after a reduction in access across the board of healthcare services
			during the COVID pandemic, this may be resulting in a reduction in the
			utilization of higher, less appropriate levels of care.
	DY1 Q1	25 Readmissions	The increase in readmission rates may be reflective of the level of illness
		(+7.8%)	of the individuals seeking care at this time. Vermonters increased in their
			problematic use during the pandemic while simultaneously seeming to
			seek healthcare less. As we come out f the pandemic and people begin to
			seek care for their use, we may see more individuals needing additional
			treatment episodes to achieve remission in their SUD.
	DY1 Q1	36 Average LOS	Vermonters increased in their problematic use during the pandemic while
		(+3.7%)	simultaneously seeming to seek healthcare less. This, coupled with the co-
			occurring mental health acuity may result in a higher disease burden in the
			population, necessitating longer stays to achieve stability sufficient to
			move to a lower level of care.
\Box The state has no metrics trends to	o report for this rep	orting topic.	
2.2.2 Implementation Update			
Compared to the demonstration			The Division of Substance Use Programs (DSU) has identified leads for
design and operational details			the new projects authorized by the recently approved waiver, scheduled for
outlined the implementation plan,			January 1, 2025, implementation:
have there been any changes or			
does the state expect to make any			• Expanded eligibility group for people with a SUD diagnosis (i.e., Community Intervention and Treatment or CIT)
changes to:			 Recovery coaching services provided directly to people will be
a. Planned activities to improve			• Recovery coaching services provided directly to people will be eligible be reimbursed by Medicaid
access to SUD treatment			

treatment, services in intensive residential and inpatient settings, medically supervised withdrawal management)? b. SUD benefit coverage under the Medicaid state plan or the Expenditure Authority, particularly for residential treatment, medically supervised withdrawal management, and medication assisted treatment services provided to individuals in IMDs?	eligibility, application/enrollment processing, coverage, reimbursement and outreach. The design document is in the process of being finalized. Vermont is working to secure project management resources for the next phase of the projects.			
Are there any other anticipated program changes that may impact metrics related to access to critical levels of care for OUD and other SUDs? If so, please describe these changes.	 The Division of Substance Use Programs (DSU) has identified leads for the new projects authorized by the recently approved waiver, scheduled for January 1, 2025 implementation: Expanded eligibility group for people with a SUD diagnosis Recovery coaching services provided directly to people will be eligible to be reimbursed by Medicaid Services provided in recovery housing will be eligible to be reimbursed by Medicaid Services provided in withdrawal management programs will be eligible to be reimbursed by Medicaid 			
[Add rows as needed]				
 The state has no implementation updates to report for this reporting topic. 3.2 Use of Evidence-based, SUD-specific Patient Placement Criteria (Milestone 2) 				

3.2.1 Metric Trends		
Discuss any relevant trends that		
the data shows related to		
assessment of need and		
qualification for SUD services.		
Changes (+ or -) greater than two		
percent should be described.		
[Add rows as needed]		
☐ The state is reporting metrics related	ed to Milestone 2, but has no metrics tren	nds to report for this reporting topic.
\boxtimes The state is not reporting any metric	cs related to this reporting topic.	
3.2.2 Implementation Update		
Compared to the demonstration		The Substance Use Disorder Treatment Standards, effective January 1,
design and operational details		2020, is being used to certify Preferred Providers and is available at:
outlined the implementation plan,		https://www.healthvermont.gov/alcohol-
have there been any changes or		drugs/professionals/treatment-provider-certification
does the state expect to make any		
changes to:		The Compliance Assessment Tool (CAT) is used during site visits to
a. Planned activities to improve		determine a Preferred Provider's level of certification compliance by
providers' use of evidence-		providing transparency about the Preferred Provider's status; highlighting
based, SUD-specific		areas that require action or emphasis; and evaluating the level and type of
placement criteria?		technical assistance need. The CAT has been used four times this quarter
b. Implementation of a		at treatment provider locations.
utilization management		
approach to ensure:		
i. Beneficiaries have		
access to SUD services		
at the appropriate level		
of care?		
ii. Interventions are		
appropriate for the		
diagnosis and level of		
care?		

iii Use of independent			
iii. Use of independent			
process for reviewing			
placement in residential			
treatment settings?			
Are there any other anticipated			
program changes that may impact			
metrics related to the use of			
evidence-based, SUD-specific			
patient placement criteria (if the			
state is reporting such metrics)? If			
so, please describe these changes.			
\Box The state has no implementation	updates to report for	or this reporting topic.	
4.2 Use of Nationally Recognized	SUD-specific Prog	ram Standards to Set Pi	rovider Qualifications for Residential Treatment Facilities (Milestone 3)
4.2.1 Metric Trends			
Discuss any relevant trends that			
the data shows related to			
assessment of need and			
qualification for SUD services.			
Changes (+ or -) greater than two			
percent should be described.			
[Add rows as needed]			
☐ The state is reporting metrics rela	ated to Milestone 3	but has no metrics trends	to report for this reporting topic.
\boxtimes The state is not reporting any me			
4.2.2 Implementation Update			
Compared to the demonstration			The Substance Use Disorder Treatment Standards, effective January 1,
design and operational details			2020, is being used to certify Preferred Providers and is available at:
outlined the implementation plan,			https://www.healthvermont.gov/alcohol-
have there been any changes or			drugs/professionals/treatment-provider-certification
does the state expect to make any			
changes to:			The Compliance Assessment Tool (CAT) is used during site visits to
			determine a Preferred Provider's level of certification compliance by

a. Implementation of residential			providing transparency about the Preferred Provider's status; highlighting
treatment provider			areas that require action or emphasis; and evaluating the level and type of
qualifications that meet the			technical assistance need. The CAT has been used four times this quarter
ASAM Criteria or other			at treatment provider locations.
nationally recognized, SUD-			
specific program standards?			
b. State review process for			
residential treatment			
providers' compliance with			
qualifications standards?			
c. Availability of medication			
assisted treatment at			
residential treatment			
facilities, either on-site or			
through facilitated access to			
services off site?			
Are there any other anticipated			
program changes that may impact			
metrics related to the use of			
nationally recognized SUD-			
specific program standards to set			
provider qualifications for			
residential treatment facilities (if			
the state is reporting such			
metrics)? If so, please describe			
these changes.			
[Add rows as needed]			
\Box The state has no implementation	updates to report for	or this reporting topic.	
	t Critical Levels o	f Care including for Me	dication Assisted Treatment for OUD (Milestone 4)
5.2.1 Metric Trends			
Discuss any relevant trends that		13 SUD Provider	13 More SUD providers enrolled, likely driven by the increase in
the data shows related to		Availability (+12.8%)	MOUD providers possibly as a result of the removal of the X-waiver
		- · · · · · · · · · · · · · · · · · · ·	

assessment of need and qualification for SUD services. At a minimum, changes (+ or -) greater than two percent should			requirement.	
be described.				
		14 SUD MAT providers (+37.5%)	14 More SUD MOUD providers enrolled possibly as a result of the removal of the X-waiver requirement.	
[Add rows as needed]				
\Box The state has no metrics trends to r	report for this repo	orting topic.		
5.2.2 Implementation Update			-	
Compared to the demonstration				
design and operational details				
outlined the implementation plan,				
have there been any changes or				
does the state expect to make any				
changes to planned activities to				
assess the availability of				
providers enrolled in Medicaid				
and accepting new patients in				
across the continuum of SUD				
care?				
Are there any other anticipated				
program changes that may impact				
metrics related to provider				
capacity at critical levels of care,				
including for medication assisted				
treatment (MAT) for OUD? If so,				
please describe these changes.				
[Add rows as needed]				
\boxtimes The state has no implementation up	pdates to report for	or this reporting topic.		
6.2 Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and OUD (Milestone 5)				

6.2.1 Metric Trends			
Discuss any relevant trends that	DY1 Q1		
the data shows related to			
assessment of need and			
qualification for SUD services. At			
a minimum, changes (+ or -)			
greater than two percent should			
be described.			
[Add rows as needed]			
\boxtimes The state has no metrics trends t	o report for this rep	orting topic.	
6.2.2 Implementation Update			
Compared to the demonstration			There are no planned changes to the prescribing guidelines and other
design and operational details			interventions.
outlined the implementation plan,			
have there been any changes or			
does the state expect to make any			
changes to:			
a. Implementation of opioid			
prescribing guidelines and			
other interventions related to			
prevention of OUD?			
b. Expansion of coverage for			
and access to naloxone?			
Are there any other anticipated			
program changes that may impact			
metrics related to the			
implementation of comprehensive			
treatment and prevention			
strategies to address opioid abuse			
and OUD? If so, please describe			
these changes.			
[Add rows as needed]			

\boxtimes The state has no implementation	updates to report for	or this reporting topic.			
7.2 Improved Care Coordination and Transitions between Levels of Care (Milestone 6)					
7.2.1 Metric Trends			· ·		
Discuss any relevant trends that					
the data shows related to					
assessment of need and					
qualification for SUD services. At					
a minimum, changes (+ or -)					
greater than two percent should					
be described.					
[Add rows as needed]					
\boxtimes The state has no metrics trends to	report for this repo	orting topic.			
7.2.2 Implementation Update					
Compared to the demonstration					
design and operational details					
outlined the implementation plan,					
have there been any changes or					
does the state expect to make any					
changes to implementation of					
policies supporting beneficiaries'					
transition from residential and					
inpatient facilities to community-					
based services and supports?					
Are there any other anticipated					
program changes that may impact					
metrics related to care					
coordination and transitions					
between levels of care? If so,					
please describe these changes.					
[Add rows as needed]					
\boxtimes The state has no implementation	updates to report for	or this reporting topic.			

8.2 SUD Health Information Technology (Health IT)			
8.2.1 Metric Trends	mology (meanin 1)	1)	
Discuss any relevant trends that the data shows related to assessment of need and qualification for SUD services. Changes (+ or -) greater than two percent should be described.	2021 vs 2022	Q1 Number of PDMP checks (+11.0%)	Q1 PDMP checks may be up as people are increasingly accessing medical care post Covid. Checking the PDMP is required by the VT pain rules.
	2021 vs 2022	Q2 Number of PDMP linkages (+62.5%)	Q2 VT continues to work to increase PDMP connectivity and this is also the result of small numbers.
[Add rows as needed]			
□ The state has no metrics trends t	o report for this rep	orting topic.	
8.2.2 Implementation Update			
Compared to the demonstration design and operational details outlined in STCs and implementation plan, have there been any changes or does the state expect to make any changes to: a. How health IT is being used to slow down the rate of growth of individuals identified with SUD? b. How health IT is being used to treat effectively individuals identified with SUD?			 VPMS moved from DSU to the Division of Health Statistics and Informatics, where the other health registries, such as the Immunization Registry, Cancer Registry and Infectious Disease Reporting system, are located. This allows for closer collaboration with other health IT systems who are at similar stages of integration and program development. The closer connections to other health IT systems allow for greater access to the same healthcare partners and increase the reach of the prescription monitoring program. The Vermont Prescription Monitoring System (VPMS) has approved two integrations with electronic health records. Testing is in the final stages, with go-live dates identified in Q2. Once these projects are fully implemented, VPMS reports will be integrated into the health record workflow.
c. How health IT is being used to effectively monitor "recovery" supports and			A prioritization list for the next healthcare entities to be granted access has been developed, and once the pilot projects have been successfully implemented, additional electronic health records and providers will also

services for individuals	he allowed access Encourantly asked questions and implementation
	be allowed access. Frequently asked questions and implementation
identified with SUD?	guidance will be drafted with the lessons learned from the pilot projects
d. Other aspects of the state's	and will be widely available.
plan to develop the health IT	
infrastructure/capabilities at	Vermont has assembled a Part 2 Data Governance Group and begun
the state, delivery system,	assessing the requirements needed to allow SUD data to be incorporated
health plan/MCO, and	into the Vermont Health Information Exchange (VHIE).
individual provider levels?	Short-term goals include use of the VHIE for Medicaid payment and
e. Other aspects of the state's	operations activities consistent with established payment and quality
health IT implementation	models, aligned with activities acknowledged by Part 2 rules, e.g.:
milestones?	• Quality assessment, improvement initiatives, utilization review
f. The timeline for achieving	Business management activities related to compliance
health IT implementation	• Other payment activities (e.g. determine need for adjustments to payment
milestones?	policies to enhance care) See 42 CFR § 2.33 (b)
g. Planned activities to increase	
use and functionality of the	Long-term goals are currently centered on effective care coordination for
state's prescription drug	individuals with SUD
monitoring program?	• Detailed long-term goals will be dependent upon ongoing rulemaking
momoring program.	Moving towards care coordination goals will require the right individual-
	level data, at the right time, delivered to the right stakeholders that can
	impact the care and outcomes people with SUD
	This long term goal is to include healthcare providers involved in
	treatment of patients for care coordination.
	Next steps:
	Data Governance
	Align Part 2 domain goals with overall HIE Data Governance Council
	goals
	• Conduct high-level overview training for Part 2 data
	• Establish Part 2 Domain Group roles, responsibilities, and objectives
	- Establish 1 att 2 Domain Group fores, responsibilities, and objectives

Are there any other anticipated			 Work with Data Domain group to establish the appropriate Part 2 data governance policies and procedures Part 2 Data Sharing with AHS Short term scope: Develop an implementation plan for Part 2 programs that have both Part 2 and non-Part 2 records to be connected to AHS via HIE
program changes that may impact metrics related to SUD Health IT			
(if the state is reporting such			
metrics)? If so, please describe			
these changes.			
[Add rows as needed]	1		
The state has no implementation	updates to report for	or this reporting topic.	
9.2 Other SUD-Related Metrics 9.2.1 Metric Trends			
Discuss any relevant trends that	DY1 Q1	26 Overdose Deaths	Overdose deaths are variable but have increased over the past
the data shows related to assessment of need and qualification for SUD services. At a minimum, changes (+ or -) greater than two percent should be described.		(count) (+26.6%) 27 Overdose Deaths (rate) (+21.0%)	three years. Vermont has seen a significant increase over the past three years. Vermont has seen a significant increase in fentanyl involvement in opioid overdose fatalities and the adulterant xylazine has been introduced into the drug supply in Vermont. Fentanyl is 50-100 times stronger than heroin and the amount in the drug supply often isn't known to users until it is used. Fentanyl is currently the most prevalent substance involved in opioid-related deaths. Of note, deaths involving fentanyl can include prescription and/or illicit fentanyl and fentanyl analogs. DSU is <u>increasingly seeing xylazine and</u> <u>gabapentin involvement</u> which is concerning because they exacerbate opioid-related decreases in respiration and is not responsive to naloxone.
[Add rows as needed]			

\Box The state has no metrics trends to report for this reporting	g topic.
9.2.2 Implementation Update	
Are there any anticipated program changes that may impact the other SUD-related metrics? If so, please describe these changes.	 The DSU continues taking the following actions to address the increase in drug overdoses: Naloxone – provide naloxone and training through collaborations with community-based organizations, including getting naloxone to the motels where the state is housing people experiencing homelessness. VT Helplink is a free and confidential referral service available to connect people to resources and treatment (802-565-LINK or www.VTHelplink.org) Recovery Centers are conductingoutreach to reduce relapse and prevent overdoses (e.g. Harm Reduction Pack distribution, peer support specialists, Recovery Coaching referrals, etc.) Providers are increasing outreach to patients and are continually re-evaluating patients' stability to triage for in-person supports, decreased take-homes, etc. Regular calls with Preferred Providers. Receives critical incidents of overdoses from the Preferred Providers for people currently in treatment. Disseminate of key harm reduction messaging on the increased risks associated with overdose and using alone.
[Add rows as needed]	
\Box The state has no implementation updates to report for th	is reporting topic.
10.2 Budget Neutrality	
10.2.1 Current status and analysis	
Discuss the current status of budget neutrality and provide an analysis of the budget neutrality to date. If the SUD component is part of a comprehensive	Updates on Budget Neutrality can be found in Section V. <i>Financial/Budget Neutrality Development/Issues</i> of the Broad Demonstration Monitoring Report.

demonstration, the state should provide an analysis of the SUD- related budget neutrality and an analysis of budget neutrality as a whole. [Add rows as needed] □ The state has no metrics trends to report for this report	orting topic.
10.2.2 Implementation Update	
Are there any anticipated program changes that may impact budget neutrality? If so, please describe these changes. [Add rows as needed]	
\boxtimes The state has no implementation updates to report	or this reporting topic.
11.1 SUD-Related Demonstration Operations and	olicy
11.1.1 Considerations	
Highlight significant SUD (or if broader demonstration, then SUD-related) demonstration operations or policy considerations that could positively or negatively impact beneficiary enrollment, access to services, timely provision of services, budget neutrality, or any other provision that has potential for beneficiary impacts. Also note any activity that may accelerate or create delays or impediments in achieving the SUD demonstration's approved goals or objectives, if not already	 The Division of Substance Use Programs (DSU) has identified the leads for the new projects authorized by the recently approved waiver, scheduled for January 1, 2025, implementation: Expanded eligibility group for people with a SUD diagnosis (i.e., Community Intervention and Treatment or CIT) Recovery coaching services provided directly to people will be eligible be reimbursed by Medicaid Services provided in recovery housing will be eligible to be reimbursed by Medicaid Services provided in withdrawal management programs will be eligible to be reimbursed by Medicaid A series of planning sessions have been conducted for the expanded eligibility group that addressed topics such as financial and clinical eligibility, application/enrollment processing, coverage, reimbursement and outreach. The design document is in the process of being finalized.

reported elsewhere in this	Vermont is pursuing project management resources for the next phase of
document. See report template	work on the projects.
instructions for more detail.	
[Add rows as needed]	
□ The state has no related considerations t	report for this reporting topic.
11.1.2 Implementation Update	
Compared to the demonstration	
design and operational details	
outlined in STCs and the	
implementation plan, have there	
been any changes or does the	
state expect to make any changes	
to:	
a. How the delivery system	
operates under the	
demonstration (e.g. through	
the managed care system or	
fee for service)?	
b. Delivery models affecting	
demonstration participants	
(e.g. Accountable Care	
Organizations, Patient	
Centered Medical Homes)?	
c. Partners involved in service	
delivery?	
Has the state experienced any	
significant challenges in	
partnering with entities contracted	
to help implement the	
demonstration (e.g., health plans,	
credentialing vendors, private	
sector providers)? Has the state	

noted any performance issues		
with contracted entities?		
What other initiatives is the state		
working on related to SUD or		
OUD? How do these initiatives		
relate to the SUD demonstration?		
How are they similar to or		
different from the SUD		
demonstration?		
[Add rows as needed]		
\boxtimes The state has no implementation updates to re-	port for this reporting topic.	
12.1 SUD Demonstration Evaluation Update		
12.1.1 Narrative Information		
Provide updates on SUD		Updates on the SUD evaluation work, deliverables and timeline can be
evaluation work and timeline.		found in Sections VIII. Quality Improvement and IX. Demonstration
The appropriate content will		Evaluation of the Broad Demonstration Monitoring Report.
depend on when this report is due		
to CMS and the timing for the		
demonstration. See report		
template instructions for more		
details.		
Provide status updates on		
deliverables related to the		
demonstration evaluation and		
indicate whether the expected		
timelines are being met and/or if		
there are any real or anticipated		
barriers in achieving the goals and		
timeframes agreed to in the STCs.		
List anticipated evaluation-related		
deliverables related to this		

demonstration and their due			
dates.			
[Add rows as needed]			
The state has no SUD demonstra	tion evaluation upo	late to report for this report	rting topic.
13.1 Other Demonstration Report	ting		
13.1.1 General Reporting Require	ements		
Have there been any changes in			
the state's implementation of the			
demonstration that might			
necessitate a change to approved			
STCs, implementation plan, or			
monitoring protocol?			
Does the state foresee the need to			
make future changes to the STCs,			
implementation plan, or			
monitoring protocol, based on			
expected or upcoming			
implementation changes?			
Compared to the details outlined			Updates on the Monitoring Protocol work, deliverables, and timeline can
in the STCs and the monitoring			be found in Section X. Compliance of the Broad Demonstration
protocol, has the state formally			Monitoring Report.
requested any changes or does the			
state expect to formally request			
any changes to:			
a. The schedule for completing			
and submitting monitoring			
reports?			
b. The content or completeness			
of submitted reports? Future			
reports?			
Has the state identified any real or			
anticipated issues submitting			

time alter manet annumental			
timely post-approval			
demonstration deliverables,			
including a plan for remediation?			
[Add rows as needed]			
The state has no updates on generation	ral reporting requir	ements to report for this r	eporting topic.
13.1.2 Post Award Public Forum			
If applicable within the timing of			
the demonstration, provide a			
summary of the annual post-			
award public forum held pursuant			
to 42 CFR § 431.420(c)			
indicating any resulting action			
items or issues. A summary of the			
post-award public forum must be			
included here for the period			
during which the forum was held			
and in the annual report.			
[Add rows as needed]			
\square There was not a post-award public	ic forum held durin	g this reporting period an	d this is not an annual report, so the state has no post award public forum
update to report for this reporting to	pic.		
14.1 Notable State Achievements a	and/or Innovation	5	
14.1 Narrative Information			
Provide any relevant summary of			
achievements and/or innovations			
in demonstration enrollment,			
benefits, operations, and policies			
pursuant to the hypotheses of the			
SUD (or if broader			
demonstration, then SUD related)			
demonstration or that served to			
provide better care for			
individuals, better health for			

populations, and/or reduce per capita cost. Achievements should focus on significant impacts to beneficiary outcomes. Whenever possible, the summary should describe the achievement or innovation in quantifiable terms, e.g., number of impacted			
e.g., number of impacted beneficiaries.			
[Add rows as needed]			
☑ The state has no notable achievements or innovations to report for this reporting topic.			