

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

June 5, 2020

Robert Gordon
Director
Michigan Department of Health and Human Services
100 South Capitol Avenue
Lansing, MI 48909

Dear Mr. Gordon:

Thank you to you and your staff for your work on the monitoring protocol for the substance use disorder (SUD) component of the Michigan's section 1115 Behavioral Health Demonstration (Project Number 11-W-00305/5). The SUD monitoring protocol submitted to the Centers for Medicare & Medicaid Services (CMS) on April 9, 2020 has been found to fulfill the requirements set forth in the Special Terms and Conditions (STC), specifically STC 19, and the State Medicaid Director Letter (SMD #17-003), "Strategies to Address the Opioid Epidemic."

The monitoring protocol is approved for the demonstration period through September 30, 2024 and is hereby incorporated into the demonstration STCs as Attachment E (see attached). Per 42 CFR 431.424(c), the approved SUD monitoring protocol should now be posted to your state's Medicaid website.

If you have any questions, please contact your CMS project officer, Mr. Thomas Long. Mr. Long is available to answer any questions concerning your section 1115 demonstration and may be reached either by phone at (410) 786 – 5019 or by email at Thomas.Long@cms.hhs.gov. We look forward to our continued partnership on the Michigan 1115 Behavioral Health demonstration.

Sincerely,

[Redacted Signature]

Andrea J. Casart
Director
Division of Eligibility and Coverage Demonstrations

cc: Keri Toback, State Monitoring Lead, CMS Medicaid and CHIP Operations Group

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

The state should complete this Title Page as part of its SUD 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	<i>Michigan</i>
Demonstration name	<i>Michigan’s 1115 Behavioral Health Demonstration</i>
Approval date for demonstration	<i>04/05/2019</i>
Approval period for SUD	<i>10/01/2019 – 09/30/2024</i>
Approval date for SUD, if different from above	<i>N/A</i>
Implementation date of SUD, if different from above	<i>N/A</i>
SUD (or if broader demonstration, then SUD - related) demonstration goals and objectives	<i>This demonstration will allow Michigan to broaden the crucial component of residential substance disorder services in the state’s existing network of SUD providers and SUD benefits to provide a broader continuum of care for beneficiaries seeking help with a SUD, including withdrawal management services in residential treatment facilities that meet the definition of an IMD. The benefits will continue to be provided through a managed care delivery system. The state and CMS expect that offering a full continuum of SUD treatment and recovery supports based on American Society of Addiction Medicine (ASAM) criteria or other nationally recognized, SUD-specific program standards, will result in improved health outcomes and sustained recovery for this population.</i>

2. Proposed Modifications to SUD Narrative Information on Implementation, by Milestone or Reporting Topic

Summary of proposed modification	Related metric (if any)	Justification for modification
1. Assessment of Need and Qualification for SUD Services		
N/A	3, 4, 5,	<i>Michigan has no modification expectations for this topic.</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)		
N/A	6, 7, 8, 9, 10, 11, 12, 36	<i>Michigan has no modification expectations for Milestone 1.</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)		
N/A		<i>There are no CMS-provided metrics related to Milestone 2.</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)		
N/A		<i>There are no CMS-provided metrics related to Milestone 3.</i>

Summary of proposed modification	Related metric (if any)	Justification for modification
<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)		
N/A	13, 14	<i>Michigan has no modification expectations for Milestone 4.</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)		
N/A	15, 18, 19, 20, 21, 22	<i>Michigan has no modification expectations for Milestone 5.</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)		
N/A	17	<i>Michigan has no modification expectations for Milestone 6.</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).		

Summary of proposed modification	Related metric (if any)	Justification for modification
8. SUD Health Information Technology (Health IT)		
<i>Please see detailed outline in part A</i>	<i>Q1, Q2, Q3</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		
<i>N/A</i>	<i>23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35</i>	<i>Michigan has no modifications for other SUD-related metrics.</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).		
10. Budget Neutrality		
<i>N/A</i>		<i>Michigan has no modifications for the budget neutrality.</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>N/A</i>		<i>Michigan has no modifications for SUD-related demonstration operations and policy.</i>

Summary of proposed modification	Related metric (if any)	Justification for modification
<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		
N/A		<i>Michigan has no modifications for SUD demonstration evaluation.</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		
N/A		<i>Michigan has no modifications for other demonstration reporting.</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		
N/A		
<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. 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).

4. 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 SUD 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 SUD demonstration.

In the monitoring report submission containing retrospective metrics data, the state should also provide a general assessment of metrics trends from the start of 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 number of medication assisted treatment (MAT) providers (Metric #14) 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 4) by briefly summarizing the trend and providing context that during this period, the state implemented a grant that supported training for new MAT providers throughout the state.

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 protocol approval.

The state proposes an alternative plan to report retrospectively for any quarters prior to monitoring protocol approval: *Based upon MI's Covid-19 Declaration of Emergency we are requesting an alternative reporting plan for retrospectively to accomplish the response to help the epidemic. We are requesting to report all first-year data by 12/30/2020. The following reports will be reported together in 12/30/2020:* Narrative information for SUD DY1 Q1; Narrative information for SUD DY1 Q2; Other monthly and quarterly metrics for SUD DY1 Q1; Narrative information for SUD DY1 Q3; Other monthly and quarterly metrics for SUD DY1 Q2; Narrative and information for SUD DY1 Q4; Other monthly and quarterly metrics for SUD DY1 Q3.

5. Reporting SUD Demonstration Metrics and Narrative Information

The state should review the guidance in Appendix A of the instructions document in order to attest it will follow CMS's guidance on reporting metrics and narrative information, or propose any deviations. The state should complete Table A below to reflect its proposed reporting schedule for the duration of its SUD demonstration approval period.

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 according as described.

The state has reviewed Appendix A of the instructions document and completed the table below with the following deviations: *Michigan seeks CMS approval to submit all annual metrics in the first quarter of the subsequent demonstration year (e.g., for DY1, the annual metrics will be reported in DY2Q1). Michigan seeks this deviation to comport with its data run schedule for annual metrics calculated on a fiscal year measurement period. This aligns with Michigan's overarching performance monitoring reporting and defined data calculation schedules. Michigan also seeks to report the last demonstration year's annual metrics on February 28, 2025.*

Table A. Michigan’s reporting in quarterly and annual monitoring reports

Dates of reporting quarter	Broader 1115 DY (if applicable) *	SUD DY	Report due (per STCs schedule)	Measurement period associated with SUD information in report, by reporting category
October 1, 2019- December 31, 2019	N/A	DY1 Q1	12/31/2020	<ul style="list-style-type: none"> • Narrative information for SUD DY1 Q1
January 1, 2020- March 31, 2020	N/A	DY1 Q2	12/31/2020	<ul style="list-style-type: none"> • Narrative information for SUD DY1 Q2 • Other monthly and quarterly metrics for SUD DY1 Q1
April 1, 2020- June 30, 2020	N/A	DY1 Q3	12/31/2020	<ul style="list-style-type: none"> • Narrative information for SUD DY1 Q3 • Other monthly and quarterly metrics for SUD DY1 Q2
July 1, 2020- September 30, 2020	N/A	DY1 Q4	12/31/2020	<ul style="list-style-type: none"> • Narrative information for SUD DY1 Q4 • Other monthly and quarterly metrics for SUD DY1 Q3
October 1, 2020- December 31, 2020	N/A	DY2 Q1	2/28/2021	<ul style="list-style-type: none"> • Narrative information for SUD DY2 Q1 • Other monthly and quarterly metrics for SUD DY1 Q4 • Annual metrics that are established quality measures for CY 2019 • Other annual metrics for SUD DY1
January 1, 2021- March 31, 2021	N/A	DY2 Q2	5/30/2021	<ul style="list-style-type: none"> • Narrative information for SUD DY2 Q2 • Other monthly and quarterly metrics for SUD DY2 Q1

Dates of reporting quarter	Broader 1115 DY (if applicable) *	SUD DY	Report due (per STCs schedule)	Measurement period associated with SUD information in report, by reporting category
April 1, 2021- June 30, 2021	N/A	DY2 Q3	8/31/2021	<ul style="list-style-type: none"> • Narrative information for SUD DY2 Q3 • Other monthly and quarterly metrics for SUD DY2 Q2
July 1, 2021- September 30, 2021	N/A	DY2 Q4	12/31/2021	<ul style="list-style-type: none"> • Narrative information for SUD DY2 Q4 • Other monthly and quarterly metrics for SUD DY2 Q3
October 1, 2021- December 31, 2021	N/A	DY3 Q1	2/28/2022	<ul style="list-style-type: none"> • Narrative information for SUD DY3 Q1 • Other monthly and quarterly metrics for SUD DY2 Q4 • Annual metrics that are established quality measures for CY 2020 • Other annual metrics for SUD DY2
January 1, 2022- March 31, 2022	N/A	DY3 Q2	5/30/2022	<ul style="list-style-type: none"> • Narrative information for SUD DY3 Q2 • Other monthly and quarterly metrics for SUD DY3 Q1
April 1, 2022- June 30, 2022	N/A	DY3 Q3	8/31/2022	<ul style="list-style-type: none"> • Narrative information for SUD DY3 Q3 • Other monthly and quarterly metrics for SUD DY3 Q2
July 1, 2022- September 30, 2022	N/A	DY3 Q4	12/31/2022	<ul style="list-style-type: none"> • Narrative information for SUD DY3 Q4 • Other monthly and quarterly metrics for SUD DY3 Q3

Dates of reporting quarter	Broader 1115 DY (if applicable) *	SUD DY	Report due (per STCs schedule)	Measurement period associated with SUD information in report, by reporting category
October 1, 2022- December 31, 2022	N/A	DY4 Q1	2/28/2023	<ul style="list-style-type: none"> • Narrative information for SUD DY4 Q1 • Other monthly and quarterly metrics for SUD DY3 Q4 • Annual metrics that are established quality measures for CY 2021 • Other annual metrics for SUD DY3
January 1, 2023- March 31, 2023	N/A	DY4 Q2	5/30/2023	<ul style="list-style-type: none"> • Narrative information for SUD DY4 Q2 • Other monthly and quarterly metrics for SUD DY4 Q1
April 1, 2023- June 30, 2023	N/A	DY4 Q3	8/31/2023	<ul style="list-style-type: none"> • Narrative information for SUD DY4 Q3 • Other monthly and quarterly metrics for SUD DY4 Q2
July 1, 2023- September 30, 2023	N/A	DY4 Q4	12/31/2023	<ul style="list-style-type: none"> • Narrative information for SUD DY4 Q4 • Other monthly and quarterly metrics for SUD DY4 Q3
October 1, 2023- December 31, 2023	N/A	DY5 Q1	2/28/2024	<ul style="list-style-type: none"> • Narrative information for SUD DY5 Q1 • Other monthly and quarterly metrics for SUD DY4 Q4 • Annual metrics that are established quality measures for CY 2022 • Other annual metrics for SUD DY4
January 1, 2024- March 31, 2024	N/A	DY5 Q2	5/30/2024	<ul style="list-style-type: none"> • Narrative information for SUD DY5 Q2 • Other monthly and quarterly metrics for SUD DY5 Q1

Dates of reporting quarter	Broader 1115 DY (if applicable) *	SUD DY	Report due (per STCs schedule)	Measurement period associated with SUD information in report, by reporting category
April 1, 2024- June 30, 2024	N/A	DY5 Q3	8/31/2024	<ul style="list-style-type: none"> • Narrative information for SUD DY5 Q3 • Other monthly and quarterly metrics for SUD DY5 Q2
July 1, 2024- September 30, 2024	N/A	DY5 Q4	12/31/2024	<ul style="list-style-type: none"> • Narrative information for SUD DY5 Q4 • Other monthly and quarterly metrics for SUD DY5 Q3
July 1, 2024- September 30, 2024	N/A	N/A	2/28/2025	<ul style="list-style-type: none"> • Annual metrics that are established quality measures for CY 2022 • Other annual metrics for SUD DY4

*In this example, the state’s SUD demonstration was added to its broader 1115 demonstration by amendment at the start of the broader 1115 demonstration’s third demonstration year. States that do not have a broader 1115 demonstration (i.e., that have a SUD demonstration only) should delete this column.

**In this example, the state 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. States with demonstration years that end January 31 or February 28 should instead report established quality measures in the first quarterly report following the annual report. All other states should report established quality measures in the annual report.