

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

March 29, 2021

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

Dear Secretary Smith,

The Centers for Medicare & Medicaid Services (CMS) has completed its review of the COVID-19 Public Health Emergency (PHE) Evaluation Design, submitted in accordance with the Special Terms and Conditions (STCs) of the Vermont Global Commitment to Health Section 1115 demonstration (Project No: 11-W-00194/1), specifically STC 71(a). CMS has determined that the evaluation design, which was submitted on February 12, 2021, meets the requirements set forth in the STCs and our COVID-19 PHE evaluation design technical assistance, and therefore approves the state's COVID-19 PHE evaluation design.

The approved evaluation design may now be posted to the state's Medicaid website within 30 days, per 42 CFR 431.424. CMS will also post the approved evaluation design on Medicaid.gov.

Please note that, in accordance with STC 78(b), a final report, consistent with the approved evaluation design, is due to CMS one year after the end of the COVID-19 section 1115 demonstration authority.

We appreciate our continued partnership with Vermont on the Global Commitment to Health section 1115 demonstration. If you have any questions, please contact your CMS demonstration team.

Sincerely,

Danielle Daly
-S

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Danielle Daly -S
Date: 2021.03.29
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Danielle Daly
Director
Division of Demonstration
Monitoring and Evaluation

**Angela D.
Garner -S**

Digitally signed by Angela
D. Garner -S
Date: 2021.03.29
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Angela D. Garner
Director
Division of System Reform
Demonstrations

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

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> <i>Additional topic of interest</i></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> <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.</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.		
<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>		
[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).		
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>		
[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
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).		

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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.
[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).		
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>		
[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).		

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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.
<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).		
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>		
<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).		

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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.
<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).		

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

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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.