

September 2019 Release of Updated Medicaid Section 1115 Substance Use Disorder (SUD) Demonstration Monitoring Tools: Monitoring Protocol Alignment Form

The Centers for Medicare & Medicaid Services (CMS) September 2019 release of the section 1115 substance use disorder (SUD) demonstration monitoring protocol tools incorporates updated guidance on reporting metrics and narrative information, and other clarifications reflecting the valuable feedback shared by states during review and use of the earlier release of these tools.

States with a monitoring protocol submitted to or approved by CMS as of October 2019 are not required to resubmit the protocol using the updated monitoring protocol tools. Instead, CMS developed this form to support states in providing the key information included in the updated protocol tools, or propose an alternative plan. States should review the monitoring protocol updates detailed in the sections below and select the appropriate checkboxes to complete the Section 1115 SUD Demonstration Monitoring Protocol Alignment Form. States should submit the completed form to the Performance Management Database and Analytics (PMDA) system under the deliverable designated as “SUD Monitoring Protocol,” and upload this with the set of documents that represent the state’s completed monitoring protocol. After reviewing the form, CMS will reach out to the state if there are any additional information needed, and will inform the state when the form is deemed complete and final. If the state has any questions while completing this form, please email the 1115 monitoring and evaluation TA mailbox (1115MonitoringAndEvaluation@cms.hhs.gov) and copy the demonstration’s CMS project officer on the message.

1. Updates to Section 1115 SUD Demonstration Technical Specifications for Monitoring Metrics (Version 2.0)

In the monitoring workbook of the state’s protocol (Part A), CMS asked the state to review the technical specification for each metric and either attest to reporting the metric according to the specification, or propose deviations from the specification for CMS approval. CMS recently released an updated version of the section 1115 SUD demonstration technical specifications manual (Version 2.0, dated August 23, 2019). Relative to the Version 1.0 manual released in October 2018, the Version 2.0 manual contains critical revisions to specifications for the following CMS-constructed metrics:

- Metric #5: Medicaid Beneficiaries Treated in an Institution for Mental Disease (IMD) for SUD
- Metric #6: Any SUD Treatment
- Metric #10: Residential and Inpatient Services
- Metric #25: Readmissions for SUD

- Metric #29: SUD Spending Within IMDs
- Metric #31: Per Capita SUD Spending within IMDs
- Metric #36: Average Length of Stay in IMDs

These changes reflect the valuable feedback shared by states during review and use of the first version of the technical specifications manual, and are critical for ensuring the metrics are calculated consistently across states.

To promote consistent reporting across states and within a state over time, CMS requests that the state review updates to each of these metrics described in the accompanying Summary of Updates to the Section 1115 SUD Demonstrations Technical Specifications for Monitoring Metrics (Version 2.0), and respond below to confirm whether it will require deviations from the specifications (other than those already described in the state's submitted or approved protocol).

The state reviewed the Summary of Updates to the Section 1115 SUD Demonstration Technical Specifications for Monitoring Metrics (Version 2.0) and attests it does not require any deviations from the specifications (other than those already described in the state's submitted or approved protocol).

The state has reviewed the Summary of Updates to the Section 1115 SUD Demonstration Technical Specifications for Monitoring Metrics (Version 2.0) and proposes the following deviations: *Insert narrative description of proposed deviations from the revised specification, indicating to which metric(s) the proposed deviation applies. State should provide justification for any proposed deviation.*

2. Clarifications to baseline reporting periods

Recent updates to the section 1115 SUD metric technical specifications manual and monitoring tools have implications for the baseline reporting periods for certain metrics. The updated technical specifications manual (Version 2.0) and monitoring tools released in September 2019 include updated guidance related to baseline reporting periods for the following metrics:

- **Metric #22 (Continuity of Pharmacotherapy for Opioid Use Disorder)** is an established quality measure that is calculated over a 2-year period. The baseline reporting period for this metric should be the calendar year in which the state's demonstration began, and the year prior. The updated manual contains additional guidance clarifying the baseline reporting period for measures calculated over a 2-year period.
- **Metric #25 (Readmissions among Beneficiaries with SUD)** is now considered to be a CMS-constructed metric. The baseline reporting period for this metric should be aligned with the baseline reporting period for other CMS-constructed metrics.
- **Metric #32 (Access to Preventive/Ambulatory Health Services for Adult Medicaid Beneficiaries with SUD)** is now clearly categorized in the monitoring workbook as an established quality measure. The baseline reporting period for this metric should be aligned with the baseline reporting period for other established quality measures.

CMS requests the state review the baseline reporting period guidance for these metrics and respond below to confirm it will align reporting with the provided guidance, or propose deviations.

The state reviewed the baseline reporting period guidance for Metrics #22, #25, and #32 and will align its baseline reporting with the updated guidance for each metric.

The state has reviewed the baseline reporting period guidance for Metrics #22, #25, and #32 and proposes the following deviations: *The state requests to maintain the agreed upon deviation for Metric #22 (See Attachment A).*