

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

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

State	<i>Nebraska</i>
Demonstration name	<i>Nebraska Substance Use Disorder Demonstration</i>
Approval date for demonstration	<i>06/28/2019</i>
Approval period for SUD	<i>07/01/2019 – 6/30/2024</i>
Approval date for SUD, if different from above	<i>06/28/2019</i>
Implementation date of SUD, if different from above	<i>07/01/2019</i>
SUD (or if broader demonstration, then SUD - related) demonstration goals and objectives	<p><i>During the demonstration period, the state seeks to achieve the following goals:</i></p> <ol style="list-style-type: none"> <i>1. Increased rates of identification, initiation, and engagement in treatment for SUD;</i> <i>2. Increased adherence to and retention in treatment;</i> <i>3. Reductions in overdose deaths, particularly those due to opioids;</i> <i>4. Reduced utilization of emergency departments and inpatient hospital settings for treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services;</i> <i>5. Fewer readmissions to the same or higher level of care where the readmission is preventable or medically inappropriate; and,</i> <i>6. Improved access to care for physical health conditions among beneficiaries with SUD</i>

2. Executive Summary

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

Key Achievements & Highlights:

During DY2Q3 (January 1, 2021 – March 31, 2021), the state focused on two implementation areas: 1) evaluation design and 2) new Medicaid-covered services.

On March 17, 2021, the state awarded the contract for the independent contractor for the evaluation design and as of this submission date have began regular meetings with the contractor.

Risks:

In DY2Q3, work on the SUD demonstration continued to be impacted by the need to allocate state Medicaid resources towards addressing COVID-19 as well as Medicaid Expansion which was implemented on October 1, 2020. This reprioritization did impact multiple demonstration implementation milestones.

Unexpected Changes: The state recorded significant metric trends during DY2Q3 reporting quarter. These metric trends were almost exclusively due to this being the first quarter fully reflecting the addition of Medicaid Expansion population.

Issues: None

Key Changes: None

3. Narrative Information on Implementation, by Milestone and Reporting Topic

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
1.2 Assessment of Need and Qualification for SUD Services			
1.2.1 Metric Trends			
<input checked="" type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to assessment of need and qualification for SUD services.	<i>The state recorded significant metric increases during DY2Q3 reporting quarter. These metric trends were almost exclusively due to this being the first quarter fully reflecting the addition of the Medicaid Expansion population.</i> *Metric 3 – Medicaid Beneficiaries with SUD Diagnosis (monthly) : 30.59%	10/01/2020-12/31/2020	Metric 3
<input type="checkbox"/> The state has no metrics trends to report for this reporting topic.			
1.2.2 Implementation Update			
Compared to the demonstration design and operational details, the state expects to make the following changes to: <ul style="list-style-type: none"> <input type="checkbox"/> i) The target population(s) of the demonstration <input type="checkbox"/> ii) The clinical criteria (e.g., SUD diagnoses) that qualify a beneficiary for the demonstration 	<i>For implementation updates, insert annual or quarterly report in which the updated was first reported.</i> EXAMPLE: ii) The state is expanding the clinical criteria to include X diagnoses.	Insert the measurement period in which the update was first reported. EXAMPLE: ii) 01/01/2018-03/31/2018	Insert the metric related to the reported update (if any) or write "N/A". EXAMPLE: ii) N/A
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input type="checkbox"/> The state expects to make other program changes that may affect metrics related to assessment of need and qualification for SUD services	EXAMPLE: The state projects an x% increase in beneficiaries with an SUD diagnosis due to an increase in the FPL limits which will be effective on X date.	EXAMPLE: 01/01/2019-03/31/2019	EXAMPLE: #6 and 7: Medicaid beneficiaries with SUD diagnosis (monthly)
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			

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Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
2.2 Access to Critical Levels of Care for OUD and other SUDs (Milestone 1)			
2.2.1 Metric Trends			
<input checked="" type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 1	<p><i>The state recorded significant metric increases during DY2Q3 reporting quarter. These metric trends were almost exclusively due to this being the first quarter fully reflecting the addition of the Medicaid Expansion population.</i></p> <p><i>*Metric 6 – Any SUD Treatment : 79.60%</i> <i>*Metric 8 – Outpatient Services: 128.60%</i> <i>*Metric 9 – Intensive Outpatient and Partial Hospitalization Services: 66.67%</i> <i>*Metric 10 – Residential and Inpatient Services: 125.54%</i> <i>*Metric 11 – Withdrawal Management: 219.79%</i> <i>*Metric 12 – Medication-Assisted Treatment (MAT): 39.10%</i></p>	<p>10/01/2020-12/31/2020</p>	<p>Metric 6, 8, 9, 10, 11, and 12</p>
<input type="checkbox"/> The state has no metrics trends to report for this reporting topic.			

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2.2.2 Implementation Update			
<p>Compared to the demonstration design and operational details, the state expects to make the following changes to:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> i) Planned activities to improve access to SUD treatment services across the continuum of care for Medicaid beneficiaries (e.g. outpatient services, intensive outpatient services, medication assisted treatment, services in intensive residential and inpatient settings, medically supervised withdrawal management) <input checked="" type="checkbox"/> ii) 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 	<p><i>On March 31, 2020, the state submitted state plan amendments (SPAs) to add Medically-monitored Inpatient Withdrawal Management (MMIW) and Opioid Treatment Program (OTP) as Medicaid-covered state plan services. The state recieved SPA approval for the MMIW and OTP services on November 3, 2020.</i></p> <p><i>The state completed the development of training materials for providers that was released in the current reporting quarter (DY2Q4). The state is also continuing work necessary to facilitate provider Medicaid enrollment and reimbursement for the new services. Anticipated service start date of June 1, 2021.</i></p> <p><i>Progress on this milestone was impacted for several reporting quarters including DY2Q3 due to the reallocation of resources to address COVID-19 as well as Medicaid expansion which was implemented on October 1, 2020.</i></p>		
<input type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input type="checkbox"/> The state expects to make other program changes that may affect metrics related to Milestone 1			
<input type="checkbox"/> The state has no implementation update to report for this reporting topic.			
3.2 Use of Evidence-based, SUD-specific Patient Placement Criteria (Milestone 2)			
3.2.1 Metric Trends			
<input type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 2			
<input checked="" type="checkbox"/> The state has no trends to report for this reporting topic.			
<input checked="" type="checkbox"/> The state is not reporting metrics related to Milestone 2.			

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3.2.2 Implementation Update			
<p>Compared to the demonstration design and operational details, the state expects to make the following changes to:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> i) Planned activities to improve providers’ use of evidence-based, SUD-specific placement criteria <input type="checkbox"/> ii) Implementation of a utilization management approach to ensure (a) beneficiaries have access to SUD services at the appropriate level of care, (b) interventions are appropriate for the diagnosis and level of care, or (c) use of independent process for reviewing placement in residential treatment settings 	<p><i>For DY2Q3, MLTC will continue its work with NE DHHS sister divisions and contracted health plans to develop additional managed care contract language specifying utilization management requirements and level of care assessments for SUD treatment.</i></p> <p><i>Progress on this milestone was impacted for several reporting quarters including DY2Q3 due to the reallocation of resources to address COVID-19 as well as Medicaid expansion which was implemented on October 1, 2020</i></p>		
<input type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input type="checkbox"/> The state expects to make other program changes that may affect metrics related to Milestone 2			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input checked="" type="checkbox"/> The state is not reporting metrics related to Milestone 2.			
4.2 Use of Nationally Recognized SUD-specific Program Standards to Set Provider Qualifications for Residential Treatment Facilities (Milestone 3)			
4.2.1 Metric Trends			
<input type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 3			
<input checked="" type="checkbox"/> The state has no trends to report for this reporting topic.			
<input checked="" type="checkbox"/> The state is not reporting metrics related to Milestone 3.			

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4.2.2 Implementation Update			
<p>Compared to the demonstration design and operational details, the state expects to make the following changes to:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> i) Implementation of residential treatment provider qualifications that meet the ASAM Criteria or other nationally recognized, SUD-specific program standards <input checked="" type="checkbox"/> ii) State review process for residential treatment providers' compliance with qualifications standards <input checked="" type="checkbox"/> iii) Availability of medication assisted treatment at residential treatment facilities, either on-site or through facilitated access to services off site 	<p><i>For DY2Q3, MLTC will continue its work with NE DHHS sister divisions and contracted health plans to develop additional managed care contract language to require provider education regarding the requirements to facilitate onsite or offsite access to MAT.</i></p> <p><i>For DY2Q3, MLTC will continue its work with the NE DHHS sister divisions and contracted health plans to develop additional managed care contract language to require reviews of residential treatment providers to assure the types of services, hours of clinical care, and credentials of staff for residential treatment settings are performed according to ASAM Criteria, or other nationally recognized, evidence-based SUD-specific program standards.</i></p> <p><i>In response to SUPPORT ACT requirements, MLTC submitted the MAT SPA on March 31, 2021.</i></p> <p><i>Progress on this milestone was impacted for several reporting quarters including DY2Q3 due to the reallocation of resources to address COVID-19 as well as Medicaid expansion which was implemented on October 1, 2020</i></p>		
<input type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input type="checkbox"/> The state expects to make other program changes that may affect metrics related to Milestone 3			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input checked="" type="checkbox"/> The state is not reporting metrics related to Milestone 3.			

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5.2 Sufficient Provider Capacity at Critical Levels of Care including for Medication Assisted Treatment for OUD (Milestone 4)			
5.2.1 Metric Trends			
<input type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 4			
<input checked="" type="checkbox"/> The state has no trends to report for this reporting topic.			
5.2.2 Implementation Update			
Compared to the demonstration design and operational details, the state expects to make the following changes to: <input checked="" type="checkbox"/> Planned activities to assess the availability of providers enrolled in Medicaid and accepting new patients in across the continuum of SUD care	<i>In DY2Q3, the state updated MCO reporting templates to incorporate reporting capacity for all ASAM levels of care. Heritage Health MCOs will report capacity beginning DY2Q4.</i> <i>Progress on this milestone was impacted for several reporting quarters including DY2Q3 due to the reallocation of resources to address COVID-19 as well as Medicaid expansion which was implemented on October 1, 2020.</i>		
<input type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input type="checkbox"/> The state expects to make other program changes that may affect metrics related to Milestone 4			
<input checked="" type="checkbox"/> The state has no implementation update to report for 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			
<input checked="" type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 5	<i>The state recorded significant metric increases during DY2Q3 reporting quarter. These metric trends were almost exclusively due to this being the first quarter fully reflecting the addition of the Medicaid Expansion population.</i> <i>*Metric 23 – Emergency Department Utilization fro SUD per 1,000:11.89%</i>	10/01/2020-12/31/2020	Metric 23
<input type="checkbox"/> The state has no trends to report for this reporting topic.			

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6.2.2 Implementation Update			
Compared to the demonstration design and operational details, the state expects to make the following changes to: <input type="checkbox"/> i) Implementation of opioid prescribing guidelines and other interventions related to prevention of OUD <input type="checkbox"/> ii) Expansion of coverage for and access to naloxone			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input type="checkbox"/> The state expects to make other program changes that may affect metrics related to Milestone 5			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
7.2 Improved Care Coordination and Transitions between Levels of Care (Milestone 6)			
7.2.1 Metric Trends			
<input type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 6			
<input checked="" type="checkbox"/> The state has no trends to report for this reporting topic.			
7.2.2 Implementation Update			
Compared to the demonstration design and operational details, the state expects to make the following changes to: <input checked="" type="checkbox"/> Implementation of policies supporting beneficiaries' transition from residential and inpatient facilities to community-based services and supports	<i>For DY2Q3, MLTC will continue its work with contracted health plans to update contract language to reflect specific requirements for Care Management follow up after SUD treatment discharge.</i> <i>Progress on this milestone was impacted for several reporting quarters including DY2Q3 due to the reallocation of resources to address COVID-19 as well as Medicaid expansion which was implemented on October 1, 2020</i>		

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<input type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input type="checkbox"/> The state expects to make other program changes that may affect metrics related to Milestone 6			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
8.2 SUD Health Information Technology (Health IT)			
8.2.1 Metric Trends			
<input checked="" type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to its Health IT metrics	<p><i>The state saw an 32.41% increase in telehealth utilization during DY2Q3 compared to the previous reporting quarter due to the COVID public health emergency.</i></p> <p><i>The state feels they have definitely demonstrated its ability to provide services through the telehealth modality and feels this metric trend is no longer relevant for the demonstration. The state believes a verbal discussion of reporting requirements is necessary.</i></p>	10/01/2020-12/31/2020	<i>Metric Q3</i>
<input type="checkbox"/> The state has no trends to report for this reporting topic.			

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
8.2.2 Implementation Update			
<p>Compared to the demonstration design and operational details, the state expects to make the following changes to:</p> <ul style="list-style-type: none"> <input type="checkbox"/> i) How health IT is being used to slow down the rate of growth of individuals identified with SUD <input type="checkbox"/> ii) How health IT is being used to treat effectively individuals identified with SUD <input type="checkbox"/> iii) How health IT is being used to effectively monitor “recovery” supports and services for individuals identified with SUD <input type="checkbox"/> iv) Other aspects of the state’s plan to develop the health IT infrastructure/capabilities at the state, delivery system, health plan/MCO, and individual provider levels <input type="checkbox"/> v) Other aspects of the state’s health IT implementation milestones <input type="checkbox"/> vi) The timeline for achieving health IT implementation milestones <input type="checkbox"/> vii) Planned activities to increase use and functionality of the state’s prescription drug monitoring program 			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input type="checkbox"/> The state expects to make other program changes that may affect metrics related to Health IT			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			

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9.2 Other SUD-Related Metrics			
9.2.1 Metric Trends			
<input checked="" type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to other SUD-related metrics	<i>The state recorded significant metric increases during DY2Q3 reporting quarter. These metric trends were almost exclusively due to this being the first quarter fully reflecting the addition of the Medicaid Expansion population. *Metric 24 – Inpatient Stays for SUD per 1,000 Medicaid Beneficiaries: 11.89%</i>	10/01/2020-12/31/2020	Metric 24
<input type="checkbox"/> The state has no trends to report for this reporting topic.			
9.2.2 Implementation Update			
<input type="checkbox"/> The state expects to make other program changes that may affect metrics related to other SUD-related metrics			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
10.2 Budget Neutrality			
10.2.1 Current status and analysis			
<input checked="" type="checkbox"/> If the SUD component is part of a broader demonstration, the state should provide an analysis of the SUD-related budget neutrality and an analysis of budget neutrality as a whole. Describe the current status of budget neutrality and an analysis of the budget neutrality to date.	<i>Nebraska reported expenditures for DY2Q3 in accordance with STC 46.</i>	01/01/2021-03/31/2021	
10.2.2 Implementation Update			
<input type="checkbox"/> The state expects to make other program changes that may affect budget neutrality			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
11.1 SUD-Related Demonstration Operations and Policy			
11.1.1 Considerations			
<input type="checkbox"/> States should highlight significant SUD (or if broader demonstration, then SUD-related) demonstration operations or policy considerations that could positively or negatively affect 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 reported elsewhere in this document. See report template instructions for more detail.			
<input checked="" type="checkbox"/> The state has no related considerations to report for this reporting topic.			
11.1.2 Implementation Update			
Compared to the demonstration design and operational details, the state expects to make the following changes to: <ul style="list-style-type: none"> <input type="checkbox"/> i) How the delivery system operates under the demonstration (e.g. through the managed care system or fee for service) <input type="checkbox"/> ii) Delivery models affecting demonstration participants (e.g. Accountable Care Organizations, Patient Centered Medical Homes) <input type="checkbox"/> iii) Partners involved in service delivery 			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			

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<input type="checkbox"/> The state experienced challenges in partnering with entities contracted to help implement the demonstration (e.g., health plans, credentialing vendors, private sector providers) and/or noted any performance issues with contracted entities			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input type="checkbox"/> The state is working on other initiatives related to SUD or OUD			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input type="checkbox"/> The initiatives described above are related to the SUD or OUD demonstration (States should note similarities and differences from the SUD demonstration)			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
12. SUD Demonstration Evaluation Update			
12.1. Narrative Information			
<input checked="" type="checkbox"/> Provide updates on SUD evaluation work and timeline. The appropriate content will depend on when this report is due to CMS and the timing for the demonstration. See report template instructions for more details.	<i>The state awarded the contract with Health Services Advisory Group (HSAG) as the demonstration evaluator on March 17, 2021 and began meeting with the contractor on April 6, 2021. These meetings are ongoing and the state is working with the contractor to develop the key informant interview protocol and needed data extracts.</i>	<i>01/01/20201 – 03/31/2021</i>	
<input type="checkbox"/> The state has no SUD demonstration evaluation update to report for this reporting topic.			

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<input checked="" type="checkbox"/> 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.	<i>The state received approval of its final Evaluation Design on August 28, 2020. The design and the approval have been posted to the MLTC SUD Demonstration website: http://dhhs.ne.gov/Pages/Substance-Use-Disorder-Demonstration.aspx</i>		
<input type="checkbox"/> The state has no SUD demonstration evaluation update to report for this reporting topic.			
<input type="checkbox"/> List anticipated evaluation-related deliverables related to this demonstration and their due dates.			
<input checked="" type="checkbox"/> The state has no SUD demonstration evaluation update to report for this reporting topic.			
13.1 Other Demonstration Reporting			
13.1.1 General Reporting Requirements			
<input type="checkbox"/> The state reports changes in its implementation of the demonstration that might necessitate a change to approved STCs, implementation plan, or monitoring protocol			
<input checked="" type="checkbox"/> The state has no updates on general requirements to report for this reporting topic.			
<input type="checkbox"/> The state anticipates the need to make future changes to the STCs, implementation plan, or monitoring protocol, based on expected or upcoming implementation changes			
<input checked="" type="checkbox"/> The state has no updates on general requirements to report for this reporting topic.			

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Compared to the demonstration design and operational details, the state expects to make the following changes to: <input type="checkbox"/> i) The schedule for completing and submitting monitoring reports <input checked="" type="checkbox"/> ii) The content or completeness of submitted reports and/or future reports	<i>In DY2Q3, MLTC received CMS comments to the submitted monitoring reports for DY2Q2 and provided both responses and uploaded updated reports.</i>		
<input type="checkbox"/> The state has no updates on general requirements to report for this reporting topic.			
<input type="checkbox"/> The state identified real or anticipated issues submitting timely post-approval demonstration deliverables, including a plan for remediation			
<input checked="" type="checkbox"/> The state has no updates on general requirements to report for this reporting topic.			
13.1.2 Post-Award Public Forum			
<input type="checkbox"/> 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.			
<input checked="" type="checkbox"/> No post-award public forum was held during this reporting period and this is not an annual report, so the state has no post-award public forum update to report for this topic.			

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
14.1 Notable State Achievements and/or Innovations			
14.1 Narrative Information			
<input type="checkbox"/> 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 beneficiaries.			
<input checked="" type="checkbox"/> The state has no notable achievements or innovations to report for this reporting topic.			

Note: Licensee and states must prominently display the following notice on any display of Measure rates:

The IET-AD, FUA-AD, FUM-AD, and AAP measures (metrics #15, 17 (1), and 17 (2), and 32) are Healthcare Effectiveness Data and Information Set (“HEDIS®”) measures that are owned and copyrighted by the National Committee for Quality Assurance (“NCQA”). NCQA makes no representations, warranties, or endorsement about the quality of any organization or physician that uses or reports performance measures and NCQA has no liability to anyone who relies on such measures or specifications.

The measure specification methodology used by CMS is different from NCQA’s methodology. NCQA has not validated the adjusted measure specifications but has granted CMS permission to adjust. Calculated measure results, based on the adjusted HEDIS specifications, may be called only “Uncertified, Unaudited HEDIS rates.”

Certain non-NCQA measures in the CMS 1115 Substance Use Disorder Demonstration contain HEDIS Value Sets (VS) developed by and included with the permission of the NCQA. Proprietary coding is contained in the VS. Users of the proprietary code sets should obtain all necessary licenses from the owners of these code sets. NCQA disclaims all liability for use or accuracy of the VS with the non-NCQA measures and any coding contained in the VS.