

# 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](mailto:1115MonitoringAndEvaluation@cms.hhs.gov)) and copy the state’s CMS demonstration team on the message.

## 1. Retrospective reporting

If a state’s monitoring protocol is approved after its initial quarterly monitoring report submission due date(s), the state should report data to CMS retrospectively for any prior quarters of section 1115 SUD demonstration implementation. States are expected to submit retrospective metrics data—provided there is adequate time for preparation of these data—in their second monitoring report submission after monitoring protocol approval. Otherwise, if the state needs additional time, the state should propose an alternative plan (i.e., specify the monitoring report that would capture the data) for reporting retrospectively on its section 1115 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 the metrics data. Unlike other monitoring report submissions, for instance, the state is not required to describe all metric changes (+ or - greater than 2 percent).

Rather, the assessment is an opportunity for states to provide context on their retrospective metrics data and to support CMS's review and interpretation of these data. 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 for CMS in Part B of its report (under Milestone 4) by briefly summarizing the trend and explaining 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:

*Kentucky already submits monitoring reports based on its initial protocol and will continue to report according to the schedule set forth in Appendix A of this document.*

## 2. 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.*

### 3. Reporting schedule

CMS has provided an updated monitoring reporting schedule for the SUD component of Kentucky's section 1115 demonstration in Appendix A. This reporting schedule aligns with CMS's understanding that the first year of Kentucky's SUD demonstration will run from July 1, 2019 to June 30, 2020 to align with its broader section 1115 demonstration.<sup>1</sup> This schedule also incorporates the additional 90-day delay in metrics reporting proposed by the state to accommodate claims run-out. The state should review the table in Appendix A and respond below to confirm it will report according to this schedule or revise and propose any deviations from this guidance.

The state attests it will report according to the reporting schedule in Appendix A.

The state reviewed the reporting schedule in Appendix A and has attached its revised demonstration reporting schedule to this form with the following deviations: *Insert narrative description of proposed changes to reporting. State should provide justification for any proposed changes to the reporting schedule that deviate from current guidance.*

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<sup>1</sup> According to Kentucky's STCs, the first year of the state's broader 1115 demonstration (DY1) ran from January 12, 2018 (the start date of the demonstration's approval period) through June 30, 2019; its subsequent broader section 1115 DYs 2 through 5 each run from July 1 to June 30; and the final year of its approval period (DY 6) runs from July 1, 2022 through September 30, 2023.

## Appendix A – Updated schedule for section 1115 SUD demonstration monitoring reporting

**Table A.1 Suggested reporting schedule for KY's section 1115 SUD demonstration**

Dates of reporting quarter	KY's Broader Section 1115 DY	KY's SUD DY	Report due (per STCs schedule)	SUD metrics included in report
7/1/2019 – 9/30/2019	DY3Q1	DY1Q1	11/30/2019	<ul style="list-style-type: none"> <li>Narrative information for SUD DY1Q1</li> </ul>
10/1/2019 – 12/31/2019	DY3Q2	DY1Q2	2/29/2020	<ul style="list-style-type: none"> <li>Narrative information for SUD DY1Q2</li> </ul>
1/1/2020 – 3/31/2020	DY3Q3	DY1Q3	5/30/2020	<ul style="list-style-type: none"> <li>Narrative information for SUD DY1Q3</li> </ul>
4/1/2020 – 6/30/2020	DY3Q4	DY1Q4	9/30/2020	<ul style="list-style-type: none"> <li>Narrative information for SUD DY1Q4</li> <li>Other monthly and quarterly metrics for SUD DY1Q1 and DY1Q2</li> <li>Annual metrics that are established quality measures (calculated for CY 2019)</li> </ul>
7/1/2020 – 9/30/2020	DY4Q1	DY2Q1	11/29/2020	<ul style="list-style-type: none"> <li>Narrative information for SUD DY2Q1</li> <li>Other monthly and quarterly metrics for SUD DY1Q3</li> </ul>
10/1/2020 – 12/31/2020	DY4Q2	DY2Q2	2/28/2021	<ul style="list-style-type: none"> <li>Narrative information for SUD DY2Q2</li> <li>Other monthly and quarterly metrics for SUD DY1Q4</li> <li>Other annual metrics (calculated for SUD DY1)</li> </ul>
1/1/2021 – 3/31/2021	DY4Q3	DY2Q3	5/30/2021	<ul style="list-style-type: none"> <li>Narrative information for SUD DY2Q3</li> <li>Other monthly and quarterly metrics for SUD DY2Q1</li> </ul>
4/1/2021 – 6/30/2021	DY4Q4	DY2Q4	9/28/2021	<ul style="list-style-type: none"> <li>Narrative information for SUD DY2Q4</li> <li>Other monthly and quarterly metrics for SUD DY2Q2</li> </ul>

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				<ul style="list-style-type: none"> <li>Annual metrics that are established quality measures (calculated for CY 2020)</li> </ul>
7/1/2021 – 9/30/2021	DY5Q1	DY3Q1	11/29/2021	<ul style="list-style-type: none"> <li>Narrative information for SUD DY3Q1</li> <li>Other monthly and quarterly metrics for SUD DY2Q3</li> </ul>
10/1/2021 – 12/31/2021	DY5Q2	DY3Q2	2/29/2022	<ul style="list-style-type: none"> <li>Narrative information for SUD DY3Q2</li> <li>Other monthly and quarterly metrics for SUD DY2Q4</li> <li>Other annual metrics (calculated for SUD DY2)</li> </ul>
1/1/2022 – 3/31/2022	DY5Q3	DY3Q3	5/30/2022	<ul style="list-style-type: none"> <li>Narrative information for SUD DY3Q3</li> <li>Other monthly and quarterly metrics for SUD DY3Q1</li> </ul>
4/1/2022 – 6/30/2022	DY5Q4	DY3Q4	9/28/2022	<ul style="list-style-type: none"> <li>Narrative information for SUD DY3Q4</li> <li>Other monthly and quarterly metrics for SUD DY3Q2</li> <li>Annual metrics that are established quality measures (calculated for CY 2021)</li> </ul>
7/1/2022 – 9/30/2022	DY6Q1	DY4Q1	11/29/2022	<ul style="list-style-type: none"> <li>Narrative information for SUD DY4Q1</li> <li>Other monthly and quarterly metrics for SUD DY3Q3</li> </ul>
10/1/2022 – 12/31/2022	DY6Q2	DY4Q2	2/29/2023	<ul style="list-style-type: none"> <li>Narrative information for SUD DY4Q2</li> <li>Other monthly and quarterly metrics for SUD DY3Q4</li> <li>Other annual metrics (calculated for SUD DY3)</li> </ul>
1/1/2023 – 3/31/2023	DY6Q3	DY4Q3	5/30/2023	<ul style="list-style-type: none"> <li>Narrative information for SUD DY4Q3</li> <li>Other monthly and quarterly metrics for SUD DY4Q1</li> </ul>
4/1/2023 – 9/30/2023	DY6Q4	DY4Q4	12/29/2023	<ul style="list-style-type: none"> <li>Narrative information for SUD DY4Q4</li> <li>Other monthly and quarterly metrics for SUD DY4Q2</li> <li>Annual metrics that are established quality measures (calculated for CY 2022)</li> </ul>

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CY = calendar year; DY = demonstration year; Q = quarter; STCs = special terms and conditions

According to the state's STCs, DY3 for the state's broader 1115 demonstration spans 7/1/2019 – 6/30/2020. The STCs also describe the final DY of the state's broader 1115 demonstration as spanning 15 months: 7/1/2022 – 9/30/2023. This additional period has been added to the final DY4Q4.