

**Medicaid Section 1115 Serious Mental Illness and Serious
Emotional Disturbance Demonstrations
Monitoring Report Template**

Note: PRA Disclosure Statement to be added here

1. Title page for the state’s serious mental illness and serious emotional disturbance (SMI/SED) demonstration or the SMI/SED component of the broader demonstration

The state should complete this title page at the beginning of a demonstration and submit as the title page for all monitoring reports. The content of this table should stay consistent over time. Definitions for certain rows are below the table.

State	<i>Oklahoma</i>
Demonstration name	<i>Institutions for Mental Diseases Waiver for Serious Mental Illness/Substance Use Disorder</i>
Approval period for section 1115 demonstration	<i>12/22/2020-12/31/2025</i>
SMI/SED demonstration start date^a	<i>12/22/2020</i>
Implementation date of SMI/SED demonstration, if different from SMI/SED demonstration start date^b	<i>12/22/2020</i>
SMI/SED (or if broader demonstration, then SMI/SED - related) demonstration goals and objectives	<i>Reduced utilization of emergency departments; Reduced preventable readmissions to acute care hospitals and residential settings; Improved availability of crisis stabilization services; Improved access to community-based services; Improved care coordination</i>
SMI/SED demonstration year and quarter	<i>SMI/SED DY1 Q2</i>
Reporting period	<i>04/01/2021 - 06/30/2021</i>

^a **SMI/SED demonstration start date:** For monitoring purposes, CMS defines the start date of the demonstration as the *effective date* listed in the state’s STCs at time of SMI/SED demonstration approval. For example, if the state’s STCs at the time of SMI/SED demonstration approval note that the SMI/SED demonstration is effective January 1, 2020 – December 31, 2025, the state should consider January 1, 2020 to be the start date of the SMI/SED demonstration. Note that the effective date is considered to be the first day the state may begin its SMI/SED demonstration. In many cases, the effective date is distinct from the approval date of a demonstration; that is, in certain cases, CMS may approve a section 1115 demonstration with an effective date that is in the future. For example, CMS may approve an extension request on 12/15/2020, with an effective date of 1/1/2021 for the new demonstration period. In many cases, the effective date also differs from the date a state begins implementing its demonstration.

^b **Implementation date of SMI/SED demonstration:** The date the state began claiming federal financial participation for services provided to individuals in institutions of mental disease.

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.

The State implemented the SMI portion of the demonstration on the approval date of the waiver, December 22, 2020.

Medicaid expansion will be implemented in the state on July 1, 2021 and is expected to add approximately 175,000 newly eligible adults to the Medicaid program. This change allows newly eligible expansion adults access to Medicaid physical and mental health services and providers previously unavailable to them. Impacts of Medicaid expansion on the waiver will be reported in the applicable future quarters.

The State was anticipating the implementation of managed care on October 1, 2021. However, on June 1, 2021 the State Supreme Court ruled that managed care could not be implemented without additional legislative authority. Implementation continues to remain on hold and is not moving forward as of this reporting period.

The State continues to pursue significant program changes related to behavioral health service delivery models. Changes include: the sunset of Behavioral Health Homes on September 30, 2021 and the expansion of Certified Community Behavioral Health Clinics (CCBHCs) to support improved care coordination, transition planning, and physical-behavioral health integration through the State's network of Community Mental Health Centers (CMHCs). One additional CCBHC was certified this reporting period, bringing the total number of new CMHCs achieving CCBHC status to four since submission of the waiver application. Additionally, the Oklahoma Department of Mental Health and Substance Abuse Services (ODMHSAS) is leading a statewide planning effort to support a comprehensive, statewide crisis response system in coordination with the new national 988 number coming in 2022.

3. Narrative information on implementation, by milestone and reporting topic

Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
1. Ensuring Quality of Care in Psychiatric Hospitals and Residential Settings (Milestone 1)			
1.1. Metric trends			
1.1.1. The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 1.	X		
1.2. Implementation update			
1.2.1. Compared to the demonstration design and operational details, the state expects to make the following changes to: 1.2.1a. The licensure or accreditation processes for participating hospitals and residential settings			<i>National accreditation requirement for IMD crisis units was added to OHCA enrollment provisions.</i>
1.2.1b. The oversight process (including unannounced visits) to ensure participating hospital and residential settings meet state’s licensing or certification and accreditation requirements	X		
1.2.1c. The utilization review process to ensure beneficiaries have access to the appropriate levels and types of care and to provide oversight on lengths of stay			<i>A reporting structure to monitor ALOS on an on-going basis was created by the State.</i>
1.2.1d. The program integrity requirements and compliance assurance process	X		
1.2.1e. The state requirement that psychiatric hospitals and residential settings screen beneficiaries for co-morbid physical health conditions, SUDs, and suicidal ideation, and facilitate access to treatment for those conditions	X		
1.2.1f. Other state requirements/policies to ensure good quality of care in inpatient and residential treatment settings	X		
1.2.2. The state expects to make other program changes that may affect metrics related to Milestone 1.			<i>Medicaid expansion will be implemented on July 1, 2021.</i>

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Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
2. Improving Care Coordination and Transitions to Community-Based Care (Milestone 2)			
2.1. Metric trends			
2.1.1. The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 2.	X		
2.2. Implementation update			
2.2.1. Compared to the demonstration design and operational details, the state expects to make the following changes to: 2.2.1a. Actions to ensure that psychiatric hospitals and residential treatment settings carry out intensive pre-discharge planning, and include community-based providers in care transitions	X		
2.2.1b. Actions to ensure psychiatric hospitals and residential settings assess beneficiaries' housing situations and coordinate with housing services providers	X		
2.2.1c. State requirement to ensure psychiatric hospitals and residential settings contact beneficiaries and community-based providers within 72 hours post discharge			<p><i>ODMHSAS proposed a requirement in administrative rules that requires CMHCs to provide follow-up within 72 hours instead of one week after inpatient discharge. Agency rules were approved by the legislature and Governor on June 11, 2021. The rules will become effective on September 15, 2021.</i></p> <p><i>One additional CCBHC was certified this quarter, bringing the total number of new CMHCs achieving CCBHC status to four since submission of the waiver application.</i></p>
2.2.1d. Strategies to prevent or decrease the lengths of stay in EDs among beneficiaries with SMI or SED (e.g., through the use of peers and psychiatric consultants in EDs to help with discharge and referral to treatment providers)	X		
2.2.1e. Other State requirements/policies to improve care coordination and connections to community-based care	X		

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Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
2.2.2. The state expects to make other program changes that may affect metrics related to Milestone 2.			<i>Medicaid expansion was implemented July 1, 2021.</i>
3. Access to Continuum of Care, Including Crisis Stabilization (Milestone 3)			
3.1. Metric trends			
3.1.1. The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 3.	X		
3.2. Implementation update			
3.2.1. Compared to the demonstration design and operational details, the state expects to make the following changes to: 3.2.1a. State requirement that providers use an evidenced-based, publicly-available patient assessment tool to determine appropriate level of care and length of stay	X		
3.2.1b. Other state requirements/policies to improve access to a full continuum of care including crisis stabilization	X		
3.2.2. The state expects to make other program changes that may affect metrics related to Milestone 3.			<i>Medicaid expansion will be implemented July 1, 2021.</i>
4. Earlier Identification and Engagement in Treatment, Including Through Increased Integration (Milestone 4)			
4.1. Metric trends			
4.1.1. The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 4.	X		
4.2. Implementation update			
4.2.1. Compared to the demonstration design and operational details, the state expects to make the following changes to: 4.2.1a. Strategies for identifying and engaging beneficiaries in treatment sooner (e.g., with supported education and employment)	X		

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Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
4.2.1b. Plan for increasing integration of behavioral health care in non-specialty settings to improve early identification of SED/SMI and linkages to treatment	X		
4.2.1c. Establishment of specialized settings and services, including crisis stabilization services, focused on the needs of young people experiencing SMI or SED	X		
4.2.1d. Other state strategies to increase earlier identification/engagement, integration, and specialized programs for young people	X		
4.2.2. The state expects to make other program changes that may affect metrics related to Milestone 4.			<i>Medicaid expansion will be implemented July 1, 2021.</i>
5. SMI/SED health information technology (health IT)			
5.1. Metric trends			
5.1.1. The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to its health IT metrics.	X		
5.2. Implementation update			
5.2.1. Compared to the demonstration design and operational details, the state expects to make the following changes to: 5.2.1a. The three statements of assurance made in the state's health IT plan	X		
5.2.1b. Closed loop referrals and e-referrals from physician/mental health provider to physician/mental health provider and/or physician/mental health provider to community-based supports	X		
5.2.1c. Electronic care plans and medical records	X		
5.2.1d. Individual consent being electronically captured and made accessible to patients and all members of the care team	X		

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Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
5.2.1e. Intake, assessment and screening tools being part of a structured data capture process so that this information is interoperable with the rest of the health IT ecosystem	X		
5.2.1f. Telehealth technologies supporting collaborative care by facilitating broader availability of integrated mental health care and primary care	X		
5.2.1g. Alerting/analytics	X		
5.2.1h. Identity management	X		
5.2.2. The state expects to make other program changes that may affect metrics related to health IT.			<i>The State HIE, OKSHINE, will implement an eCQM tool module and dashboard. The implementation will include training documents and a companion guide. This module is projected to be operational in September of 2022. Operations include continual parsing and analysis of CCD data, performance reporting, and eCQM support.</i>
6. Other SMI/SED-related metrics			
6.1. Metric trends			
6.1.1. The state reports the following metric trends, including all changes (+ or -) greater than two percent related to other SMI/SED-related metrics.	X		
6.2. Implementation update			
6.2.1. The state expects to make the following program changes that may affect other SMI/SED-related metrics.			<i>Medicaid expansion will be implemented July 1, 2021.</i>

4. Narrative information on other reporting topics

Prompt	State has no trends/update to report (place an X)	State response
7. Annual Assessment of the Availability of Mental Health Services (Annual Availability Assessment)		
7.1. Description of changes to baseline conditions and practices		
7.1.1. Describe and explain any changes in the mental health service needs (for example, prevalence and distribution of SMI/SED) of Medicaid beneficiaries with SMI/SED compared to those described in the Initial Assessment of the Availability of Mental Health Services. Recommended word count is 500 words or less.	X	
7.1.2. Describe and explain any changes to the organization of the state’s Medicaid behavioral health service delivery system compared to those described in the Initial Assessment of the Availability of Mental Health Services. Recommended word count is 500 words or less.	X	
7.1.3. Describe and explain any changes in the availability of mental health services for Medicaid beneficiaries with SMI/SED in the state compared to those described in the Initial Assessment of the Availability of Mental Health Services. At minimum, explain any changes across the state in the availability of the following services: inpatient mental health services; outpatient and community-based services; crisis behavioral health services; and care coordination and care transition planning. Recommended word count is 500 words or less.	X	
7.1.4. Describe and explain any changes in gaps the state identified in the availability of mental health services or service capacity while completing the Annual Availability Assessment compared to those described in the Initial Assessment of the Availability of Mental Health Services. Recommended word count is 500 words or less.	X	

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Prompt	State has no trends/update to report (place an X)	State response												
7.1.5. Describe and explain whether any changes in the availability of mental health services have impacted the state’s maintenance of effort (MOE) on funding outpatient community-based mental health services. Recommended word count is 500 words or less.		<i>Provider participation in the behavioral health home program has decreased due to attrition over the past several years and the anticipated sunset of the program in September 2021. The State is in the process of transitioning most health homes to more cost-effective Certified Community Behavioral Health Clinics.</i>												
7.2. Implementation update														
7.2.1. Compared to the demonstration design and operational details, the state expects to make the following changes to: 7.2.1a. The state’s strategy to conduct annual assessments of the availability of mental health services across the state and updates on steps taken to increase availability	X													
7.2.1b. Strategies to improve state tracking of availability of inpatient and crisis stabilization beds		<i>Due to staffing changes at ODMHSAS, the agency is re-evaluating the timeline for expansion of bed availability tracking.</i>												
8. Maintenance of effort (MOE) on funding outpatient community-based mental health services														
8.1. MOE dollar amount														
8.1.1. Provide as a dollar amount the level of state appropriations and local funding for outpatient community-based mental health services for the most recently completed state fiscal year.		<p><i>SFY 20</i></p> <table border="1" data-bbox="989 1057 1283 1219"> <thead> <tr> <th>Medicaid Program</th> <th>State Dollars</th> </tr> </thead> <tbody> <tr> <td>Regular TXIX</td> <td>54,898,648.34</td> </tr> <tr> <td>CHIP</td> <td>2,608,734.45</td> </tr> <tr> <td>Health Homes</td> <td>6,614,171.91</td> </tr> <tr> <td>CCBHC</td> <td>17,505,607.03</td> </tr> <tr> <td></td> <td>81,627,161.73</td> </tr> </tbody> </table>	Medicaid Program	State Dollars	Regular TXIX	54,898,648.34	CHIP	2,608,734.45	Health Homes	6,614,171.91	CCBHC	17,505,607.03		81,627,161.73
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Prompt	State has no trends/update to report (place an X)	State response
<p>8.2.1. Describe and explain any reductions in the MOE dollar amount below the amount provided in the state’s application materials. The state should confirm that it did not move resources to increase access to treatment in inpatient or residential settings at the expense of community-based services.</p>		<p><i>The reductions in the dollar amount above from SFY 19 are not a result of moving resources from community to inpatient/residential services. The reduction represents:</i></p> <p><i>1) an increase in FMAP and resulting decrease in state match needed for the same community-based services from SFY 19 to SFY 20. This is due to a FFY 20 increase to the State’s FMAP, plus the enhanced COVID-19 FMAP, the state match decreased from 33.98% for most of SFY 19 to 25.81% for most of SFY 20; and</i></p> <p><i>2) behavioral health home program attrition due to current trends and the anticipated sunseting of the program in September 2021, as well as efforts to transition these programs to more cost-effective Certified Community Behavioral Health Clinics.</i></p> <p><i>The State also notes that both SFY 19 and SFY 20 are before the approval/effective date of the demonstration and thus MOE changes are not representative of any impact related to the demonstration implementation.</i></p>
<p>9. SMI/SED financing plan 9.1. Implementation update</p>		
<p>9.1.1. Compared to the demonstration design and operational details, the state expects to make the following changes to:</p> <p>9.1.1a. Increase availability of non-hospital, non-residential crisis stabilization services, including services made available through crisis call centers, mobile crisis units, and observation/assessment centers, with a coordinated community crisis response that involves law enforcement and other first responders</p>		<p><i>With the approaching conversion to the national 988 crisis number, the ODMHSAS is serving as the central organizing body for planning and readiness toward a comprehensive, statewide crisis response system in Oklahoma. The goal of the project is to integrate the national 988 number with the statewide crisis call center system to allow for triage and referral for all adult callers. Another goal of this system is to assist law enforcement to appropriately refer and manage crisis situations.</i></p>
<p>9.1.1b. Increase availability of on-going community-based services, e.g., outpatient, community mental health centers, partial hospitalization/day treatment, assertive community treatment, and services in integrated care settings such as the Certified Community Behavioral Health Clinic model</p>	X	

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Prompt	State has no trends/update to report (place an X)	State response
10. Budget neutrality		
10.1. Current status and analysis		
10.1.1. Describe the current status of budget neutrality and an analysis of the budget neutrality to date. If the SMI/SED component is part of a broader demonstration, the state should provide an analysis of the SMI/SED-related budget neutrality and an analysis of budget neutrality as a whole.		<i>State staff worked with its third-party/independent evaluator (PHPG) on the budget neutrality design for the separate 1115 SMI/SUD waiver. The budget neutrality design for this 1115 waiver demonstration has been submitted and State staff continue to support the independent evaluator to ensure necessary data is included for the upcoming budget neutrality quarterly report.</i>
10.2. Implementation update		
10.2.1. The state expects to make the following program changes that may affect budget neutrality.		<i>Budget neutrality calculations will include Medicaid expansion estimated impacts within later quarters and/or demonstration year calculations.</i>
11. SMI/SED-related demonstration operations and policy		
11.1. Considerations		
11.1.1. The state should highlight significant SMI/SED (or if broader demonstration, then SMI/SED-related) demonstration operations or policy considerations that could positively or negatively impact 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 SMI/SED demonstration’s approved goals or objectives, if not already reported elsewhere in this document. See Monitoring Report Instructions for more detail.		<i>Oklahoma's Medicaid program will undergo significant changes in SFY 2022. Beginning July 1, 2021, the State will implement Medicaid expansion, bringing approximately 175,000 newly eligible adults into the Medicaid program during this reporting period.</i> <i>The State also plans to sunset the Behavioral Health Home (BHH) program on September 30, 2021. Members will continue to receive services through expanded access to CCBHCs and continued services and care coordination offered by behavioral health providers.</i>
11.2. Implementation update		
11.2.1. 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.	X	

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Prompt	State has no trends/update to report (place an X)	State response
11.2.2. The state is working on other initiatives related to SMI/SED.		<i>With the approaching conversion to the national 988 crisis number, the ODMHSAS is serving as the central organizing body for planning and readiness toward a comprehensive, statewide crisis response system in Oklahoma. The goal of the project is to integrate the national 988 number with the statewide crisis call center system, which will allow for triage and referral for all adult callers. Another goal of this system is to assist law enforcement to appropriately refer and manage crisis situations.</i>
11.2.3. The initiatives described above are related to the SMI/SED demonstration as described (The state should note similarities and differences from the SMI/SED demonstration).		<i>Medicaid expansion will support efforts to meet Milestone 1 & 3. The expanded crisis call line supports the State's efforts to meet Milestone 3.</i>
11.2.4. Compared to the demonstration design and operational details, the state expects to make the following changes to: 11.2.4a. How the delivery system operates under the demonstration (e.g. through the managed care system or fee for service)	X	
11.2.4b. Delivery models affecting demonstration participants (e.g. Accountable Care Organizations, Patient Centered Medical Homes)		<i>The State plans to sunset the Behavioral Health Home (BHH) program on September 30, 2021. Members will continue to receive services through expanded access to CCBHCs and continued services and care coordination offered by Behavioral Health providers.</i>
11.2.4c. Partners involved in service delivery	X	
11.2.4d. The state Medicaid agency's Memorandum of Understanding (MOU) or other agreement with its mental health services agency	X	
12. SMI/SED demonstration evaluation update		
12.1. Narrative information		
12.1.1. Provide updates on SMI/SED evaluation work and timeline. The appropriate content will depend on when this report is due to CMS and the timing for the demonstration. There are specific requirements per the Code of Federal Regulations (CFR) for annual reports. See Monitoring Report Instructions for more details.	X	<i>The State submitted the evaluation design on June 18, 2021 and continues to negotiate terms with CMS.</i>

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Prompt	State has no trends/update to report (place an X)	State response
12.1.2. 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 submitted the evaluation design on June 18, 2021 and continues to negotiate terms with CMS.</i>
12.1.3. List anticipated evaluation-related deliverables related to this demonstration and their due dates.		<i>The evaluation design is was due on June 20, 2021. The mid-point assessment is due on August 15, 2023. The interim evaluation report is due on June 30, 2024 or with renewal application. The summative evaluation report is due on December 31, 2026.</i>
13. Other demonstration reporting		
13.1. General reporting requirements		
13.1.1. The state reports changes in its implementation of the demonstration that might necessitate a change to approved STCs, implementation plan, or monitoring protocol.	X	
13.1.2. The state anticipates the need to make future changes to the STCs, implementation plan, or monitoring protocol, based on expected or upcoming implementation changes.	X	
13.1.3. The state identified real or anticipated issues submitting timely post-approval demonstration deliverables, including a plan for remediation.	X	
13.1.4. Compared to the demonstration design and operational details, the state expects to make the following changes to: 13.1.4a. The schedule for completing and submitting monitoring reports	X	
13.1.4b. The content or completeness of submitted monitoring reports and/or future monitoring reports	X	

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Prompt	State has no trends/update to report (place an X)	State response
13.2. Post-award public forum		
13.2.1. 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 monitoring report.		<i>The first post-award forum was held on May 14, 2021. The forum provided an update and overview of waiver implementation and goals. No comments were received.</i>
14. Notable state achievements and/or innovations		
14.1. Narrative information		
14.1.1. Provide any relevant summary of achievements and/or innovations in demonstration enrollment, benefits, operations, and policies pursuant to the hypotheses of the SMI/SED (or if broader demonstration, then SMI/SED 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.	X	

*The state should remove all example text from the table prior to submission.

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

The MPT, FUH-CH, FUH-AD, FUA-AD, FUM-AD, AAP, and APM measures (#13, 14, 15, 16, 17, 18, 7, 8, 9, 10, 26, 29) are Healthcare Effectiveness Data and Information Set (HEDIS®) measures that are owned and copyrighted by the National Committee for Quality Assurance (NCQA). HEDIS measures and specifications are not clinical guidelines, do not establish a standard of medical care and have not been tested for all potential applications. The measures and specifications are provided “as is” without warranty of any kind. NCQA makes no representations, warranties or endorsements about the quality of any product, test or protocol identified as numerator compliant or otherwise identified as meeting the requirements of a HEDIS measure or specification. NCQA makes no representations, warranties, or endorsement about the quality of any organization or clinician who uses or reports performance measures and NCQA has no liability to anyone who relies on HEDIS measures or specifications or data reflective of performance under such measures and 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. A calculated measure result (a “rate”) from a HEDIS measure that has not been certified via NCQA’s Measure

Certification Program, and is based on adjusted HEDIS specifications, may not be called a “HEDIS rate” until it is audited and designated reportable by an NCQA-Certified HEDIS Compliance Auditor. Until such time, such measure rates shall be designated or referred to as “Adjusted, Uncertified, Unaudited HEDIS rates.”