

June 18, 2026

Steven Ford, Director of the Virginia Department of Medical Assistance Services  
600 East Broad Street,  
Richmond, VA 23219

Dear Steven Ford:

In accordance with 42 CFR 438.6(c), the Centers for Medicare & Medicaid Services (CMS) has reviewed and is approving Virginia's submission of a proposal for a state directed payment (SDP) under Medicaid managed care plan contract(s). The proposal was received by CMS on March 31, 2026, and a final revised preprint was received on May 29, 2026. The proposal has a control name of VA\_Fee\_AMC.PC.SP2\_Renewal\_20260701-20270630.

CMS has completed our review of the following Medicaid managed care SDP(s):

- Uniform percentage increase for professional services at an academic medical center, primary care services, and specialty physician services related to physicians employed by or contracted by a private acute care type 2 hospital system with at least one level 2 trauma center as of January 2022 located in Lord Fairfax Health District and Northwest Health Planning Region for rating periods covering July 1, 2026 through June 30, 2027, incorporated in the capitation rates through a separate payment term amount of up to \$4,608,437.

This letter satisfies the regulatory requirement in 42 CFR 438.6(c)(2) for SDPs described in 42 CFR 438.6(c)(1). This letter pertains only to the actions identified above and does not apply to other actions currently under CMS's review. This letter does not constitute approval of any specific Medicaid financing mechanism used to support the non-federal share of expenditures associated with these actions. All relevant federal laws and regulations apply. CMS reserves its authority to enforce requirements in the Social Security Act and the applicable implementing regulations.

Based on CMS's preliminary determination, the VA\_Fee\_AMC.PC.SP2\_Renewal\_20250701-20260630 SDP proposal likely qualified for the temporary grandfathering period in section 71116(b) of Public Law 119-21 (hereinafter referred to as "section 71116"). CMS acknowledges that this determination is preliminary in nature and policies will be finalized as part of notice and comment rulemaking. CMS will enforce all federal requirements, including section 71116, and CMS's assessment may be revised if further information is identified that alters the initial assessment.

Until the phase down required by section 71116 begins, the total dollar amount of a grandfathered SDP (as specified in item 4 of the current SDP preprint form) cannot increase and a state cannot increase this total dollar amount under any change or revision to the grandfathered SDP, including an amendment to the SDP, or subsequent renewal of this SDP for a future rating period. For rating periods beginning on or after January 1, 2028, grandfathered SDPs must comply with the specified phase down requirements.

The state is required to submit contract action(s) and related capitation rates that include all SDPs, including those that do not require written prior approval as specified in 42 CFR 438.6(c)(2)(i). Additionally, all SDPs must be addressed in the applicable rate certifications. CMS recommends that states share this letter and the preprint(s) with the certifying actuary. Documentation of all SDPs must be included in the initial rate certification as outlined in Section I, Item 4, Subsection D, of the [Medicaid Managed Care Rate Development Guide](#). The state and its actuary must ensure all documentation outlined in the Medicaid Managed Care Rate Development Guide is included in the initial rate certification. Failure to provide all required documentation in the rate certification will cause delays in CMS review.

Approval of this SDP proposal for the applicable rating period does not preclude CMS from requesting additional materials from the state, revision to the SDP proposal design, or any other modifications to the proposal for this rating period or future rating periods, if CMS determines that such modifications are required for the state to meet relevant federal requirements.

If you have any questions concerning this letter, please contact [StateDirectedPayment@cms.hhs.gov](mailto:StateDirectedPayment@cms.hhs.gov).

Sincerely,

John Giles  
Director, Managed Care Group  
Center for Medicaid and CHIP Services

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## Section 438.6(c) Preprint

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42 C.F.R. § 438.6(c) provides States with the flexibility to implement delivery system and provider payment initiatives under MCO, PIHP, or PAHP Medicaid managed care contracts (i.e., state directed payments). 42 C.F.R. § 438.6(c)(1) describes types of payment arrangements that States may use to direct expenditures under the managed care contract. Under 42 C.F.R. § 438.6(c)(2)(ii), contract arrangements that direct an MCO's, PIHP's, or PAHP's expenditures under paragraphs (c)(1)(i) through (c)(1)(ii) and (c)(1)(iii)(B) through (D) must have written approval from CMS prior to implementation and before approval of the corresponding managed care contract(s) and rate certification(s). This preprint implements the prior approval process and must be completed, submitted, and approved by CMS before implementing any of the specific payment arrangements described in 42 C.F.R. § 438.6(c)(1)(i) through (c)(1)(ii) and (c)(1)(iii)(B) through (D). Please note, per the 2020 Medicaid and CHIP final rule at 42 C.F.R. § 438.6(c)(1)(iii)(A), States no longer need to submit a preprint for prior approval to adopt minimum fee schedules using State plan approved rates as defined in 42 C.F.R. § 438.6(a).

Submit all state directed payment preprints for prior approval to:  
[StateDirectedPayment@cms.hhs.gov](mailto:StateDirectedPayment@cms.hhs.gov).

### SECTION I: DATE AND TIMING INFORMATION

1. Identify the State's managed care contract rating period(s) for which this payment arrangement will apply (for example, July 1, 2020 through June 30, 2021):  
July 1, 2026 - June 30, 2027
2. Identify the State's requested start date for this payment arrangement (for example, January 1, 2021). *Note, this should be the start of the contract rating period unless this payment arrangement will begin during the rating period.* July 1, 2026
3. Identify the managed care program(s) to which this payment arrangement will apply:  
Cardinal Care Managed Care
4. Identify the estimated **total dollar amount** (federal and non-federal dollars) of this state directed payment: \$4,608,437

a. Identify the estimated federal share of this state directed payment: \$3,263,120

b. Identify the estimated non-federal share of this state directed payment: \$1,345,317

*Please note, the estimated total dollar amount and the estimated federal share should be described for the rating period in Question 1. If the State is seeking a multi-year approval (which is only an option for VBP/DSR payment arrangements (42 C.F.R. § 438.6(c)(1)(i)-(ii))), States should provide the estimates per rating period. For amendments, states should include the change from the total and federal share estimated in the previously approved preprint.*

5. Is this the initial submission the State is seeking approval under 42 C.F.R. § 438.6(c) for this state directed payment arrangement? ☐ Yes ☒ No

6. If this is not the initial submission for this state directed payment, please indicate if:
- a. ☐ The State is seeking approval of an amendment to an already approved state directed payment.
  - b. ☒ The State is seeking approval for a renewal of a state directed payment for a new rating period.
    - i. If the State is seeking approval of a renewal, please indicate the rating periods for which previous approvals have been granted:  
**7/1/24-6/30/26**
  - c. Please identify the types of changes in this state directed payment that differ from what was previously approved.
    - ☐ Payment Type Change
    - ☐ Provider Type Change
    - ☒ Quality Metric(s) / Benchmark(s) Change
    - ☐ Other; please describe:
    - ☐ No changes from previously approved preprint other than rating period(s).
7. ☒ Please use the checkbox to provide an assurance that, in accordance with 42 C.F.R. § 438.6(c)(2)(ii)(F), the payment arrangement is not renewed automatically.

## SECTION II: TYPE OF STATE DIRECTED PAYMENT

8. In accordance with 42 C.F.R. § 438.6(c)(2)(ii)(A), describe in detail how the payment arrangement is based on the utilization and delivery of services for enrollees covered under the contract. The State should specifically discuss what must occur in order for the provider to receive the payment (e.g., utilization of services by managed care enrollees, meet or exceed a performance benchmark on provider quality metrics).

Consistent with 42 CFR §438.6(c)(1)(iii)(C), the contracted Cardinal Care Medicaid health plan will provide a uniform percentage increase to the base health plan payments made to physician practices that are a component of the qualifying private health system. The uniform percentage will be determined once per year by the state based on an upper payment limit (UPL) calculated using the Average Commercial Rate (ACR) calculation methodology. Consistent with CMS requirements applicable for fee-for-service UPL calculations, commercial rates will be collected and service-level Average Commercial Rates will be calculated once every three years. The most recent twelve months of valid Medicaid health plan encounters received and available will be used to link payments to utilization by physician in each group. Medicaid health plans are required to submit encounter data to the Virginia Department of Medical Assistance Services in accordance with formatting and timeliness standards set forth in their contracts with the State. The difference between payments calculated through the ACR and managed care encounter claim payments will equal the maximum possible annual payment increase by MCO and physician group.

The maximum possible supplemental payment for the health system may be adjusted downward at the start of the state fiscal year based on available funds for the non-federal share. Shortly after the end of each quarter, DMAS will issue a Directed Payment to each Medicaid health plan for payment to physician practices that are a component of the qualifying private health system.

Two classes of providers are defined in this preprint. Class I includes all providers meeting the criteria documented in preprint Item 20b. Class II providers are those that meet the enhanced eligibility criteria of reporting information for the SBIRT quality measure and meeting quality targets for the other three quality measures documented in this preprint. Two uniform increase percentages are documented in preprint Item 19b, one for Class I providers and a second for providers who also qualify for Class II.

- a. ☒ Please use the checkbox to provide an assurance that CMS has approved the federal authority for the Medicaid services linked to the services associated with the SDP (i.e., Medicaid State plan, 1115(a) demonstration, 1915(c) waiver, etc.).
- b. Please also provide a link to, or submit a copy of, the authority document(s) with initial submissions and at any time the authority document(s) has been renewed/revised/updated.

Physician services are authorized under the Medicaid State Plan for the Categorically Needy in Attachment 3.1-A (Number 5). See <https://www.dmas.virginia.gov/media/4537/31a-amount-duration-and-scope-categorically-needy.pdf>.

9. Please select the general type of state directed payment arrangement the State is seeking prior approval to implement. (Check all that apply and address the underlying questions for each category selected.)

- a. ☐ **VALUE-BASED PAYMENTS / DELIVERY SYSTEM REFORM:** In accordance with 42 C.F.R. § 438.6(c)(1)(i) and (ii), the State is requiring the MCO, PIHP, or PAHP to implement value-based purchasing models for provider reimbursement, such as alternative payment models (APMs), pay for performance arrangements, bundled payments, or other service payment models intended to recognize value or outcomes over volume of services; or the State is requiring the MCO, PIHP, or PAHP to participate in a multi-payer or Medicaid-specific delivery system reform or performance improvement initiative.

*If checked, please answer all questions in Subsection IIA.*

- b. ☒ **FEE SCHEDULE REQUIREMENTS:** In accordance with 42 C.F.R. § 438.6(c)(1)(iii)(B) through (D), the State is requiring the MCO, PIHP, or PAHP to adopt a minimum or maximum fee schedule for network providers that provide a particular service under the contract; or the State is requiring the MCO, PIHP, or PAHP to provide a uniform dollar or percentage increase for network providers that provide a particular service under the contract. **[Please note, per the 2020 Medicaid and CHIP final rule at 42 C.F.R. § 438.6(c)(1)(iii)(A), States no longer need to submit a preprint for prior approval to adopt minimum fee schedules using State plan approved rates as defined in 42 C.F.R. § 438.6(a).]**

*If checked, please answer all questions in Subsection IIB.*

#### **SUBSECTION IIA: VALUE-BASED PAYMENTS (VBP) / DELIVERY SYSTEM REFORM (DSR):**

*This section must be completed for all state directed payments that are VBP or DSR. This section does not need to be completed for state directed payments that are fee schedule requirements.*

10. Please check the type of VBP/DSR State directed payment the State is seeking prior approval for. *Check all that apply; if none are checked, proceed to Section III.*

- ☐ Quality Payment/Pay for Performance (Category 2 APM, or similar)
- ☐ Bundled Payment/Episode-Based Payment (Category 3 APM, or similar)
- ☐ Population-Based Payment/Accountable Care Organization (Category 4 APM, or similar)
- ☐ Multi-Payer Delivery System Reform
- ☐ Medicaid-Specific Delivery System Reform
- ☐ Performance Improvement Initiative
- ☐ Other Value-Based Purchasing Model

**11.** Provide a brief summary or description of the required payment arrangement selected above and describe how the payment arrangement intends to recognize value or outcomes over volume of services. If “other” was checked above, identify the payment model. The State should specifically discuss what must occur in order for the provider to receive the payment (e.g., meet or exceed a performance benchmark on provider quality metrics).

**12.** In Table 1 below, identify the measure(s), baseline statistics, and targets that the State will tie to provider performance under this payment arrangement (provider performance measures). Please complete all boxes in the row. To the extent practicable, CMS encourages states to utilize existing, validated, and outcomes-based performance measures to evaluate the payment arrangement, and recommends States use the [CMS Adult and Child Core Set Measures](#) when applicable. If the state needs more space, please use Addendum Table 1.A and check this box: ☐

**TABLE 1: Payment Arrangement Provider Performance Measures**

| Measure Name and NQF # (if applicable)                                          | Measure Steward/ Developer <sup>1</sup> | Baseline <sup>2</sup> Year | Baseline <sup>2</sup> Statistic | Performance Measurement Period <sup>3</sup> | Performance Target | Notes <sup>4</sup>   |
|---------------------------------------------------------------------------------|-----------------------------------------|----------------------------|---------------------------------|---------------------------------------------|--------------------|----------------------|
| <i>Example: Percent of High-Risk Residents with Pressure Ulcers – Long Stay</i> | <i>CMS</i>                              | <i>CY 2018</i>             | <i>9.23%</i>                    | <i>Year 2</i>                               | <i>8%</i>          | <i>Example notes</i> |
| <b>a.</b>                                                                       |                                         |                            |                                 |                                             |                    |                      |
| <b>b.</b>                                                                       |                                         |                            |                                 |                                             |                    |                      |
| <b>c.</b>                                                                       |                                         |                            |                                 |                                             |                    |                      |
| <b>d.</b>                                                                       |                                         |                            |                                 |                                             |                    |                      |
| <b>e.</b>                                                                       |                                         |                            |                                 |                                             |                    |                      |

1. Baseline data must be added after the first year of the payment arrangement

2. If state-developed, list State name for Steward/Developer.

3. If this is planned to be a multi-year payment arrangement, indicate which year(s) of the payment arrangement that performance on the measure will trigger payment.

4. If the State is using an established measure and will deviate from the measure steward’s measure specifications, please describe here. Additionally, if a state-specific measure will be used, please define the numerator and denominator here.

a. Please describe the methodology used to set the performance targets for each measure.

**b.** If multiple provider performance measures are involved in the payment arrangement, discuss if the provider must meet the performance target on each measure to receive payment or can providers receive a portion of the payment if they meet the performance target on some but not all measures?

c. For state-developed measures, please briefly describe how the measure was developed?

**14. Is the State seeking a multi-year approval of the state directed payment arrangement?**

☐ Yes ☒ No

- a. If this payment arrangement is designed to be a multi-year effort, denote the State's managed care contract rating period(s) the State is seeking approval for.
- b. If this payment arrangement is designed to be a multi-year effort and the State is **NOT** requesting a multi-year approval, describe how this application's payment arrangement fits into the larger multi-year effort and identify which year of the effort is addressed in this application.

**15. Use the checkboxes below to make the following assurances:**

- a. ☐ In accordance with 42 C.F.R. § 438.6(c)(2)(iii)(A), the state directed payment arrangement makes participation in the value-based purchasing initiative, delivery system reform, or performance improvement initiative available, using the same terms of performance, to the class or classes of providers (identified below) providing services under the contract related to the reform or improvement initiative.
- b. ☐ In accordance with 42 C.F.R. § 438.6(c)(2)(iii)(B), the payment arrangement makes use of a common set of performance measures across all of the payers and providers.
- c. ☐ In accordance with 42 C.F.R. § 438.6(c)(2)(iii)(C), the payment arrangement does not set the amount or frequency of the expenditures.
- d. ☐ In accordance with 42 C.F.R. § 438.6(c)(2)(iii)(D), the payment arrangement does not allow the State to recoup any unspent funds allocated for these arrangements from the MCO, PIHP, or PAHP.

**SUBSECTION IIB: STATE DIRECTED FEE SCHEDULES:**

*This section must be completed for all state directed payments that are fee schedule requirements. This section does not need to be completed for state directed payments that are VBP or DSR.*

**16. Please check the type of state directed payment for which the State is seeking prior approval. Check all that apply; if none are checked, proceed to Section III.**

- a. ☐ Minimum Fee Schedule for providers that provide a particular service under the contract *using rates other than State plan approved rates*<sup>1</sup> (42 C.F.R. § 438.6(c)(1)(iii)(B))
- b. ☐ Maximum Fee Schedule (42 C.F.R. § 438.6(c)(1)(iii)(D))
- c. ☒ Uniform Dollar or Percentage Increase (42 C.F.R. § 438.6(c)(1)(iii)(C))

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<sup>1</sup> Please note, per the 2020 Medicaid and CHIP final rule at 42 C.F.R. § 438.6(c)(1)(iii)(A), States no longer need to submit a preprint for prior approval to adopt minimum fee schedules that use State plan approved rates as defined in 42 C.F.R. § 438.6(a).

**17. If the State is seeking prior approval of a fee schedule (options a or b in Question 16):**

- a.** Check the basis for the fee schedule selected above.
  - i.** ☐ The State is proposing to use a fee schedule based on the **State-plan approved rates** as defined in 42 C.F.R. § 438.6(a). <sup>2</sup>
  - ii.** ☐ The State is proposing to use a fee schedule based on the **Medicare or Medicare-equivalent rate**.
  - iii.** ☐ The State is proposing to use a fee schedule based on an **alternative fee schedule established by the State**.
    - 1.** If the State is proposing an alternative fee schedule, please describe the alternative fee schedule (e.g., 80% of Medicaid State-plan approved rate)
- b.** Explain how the state determined this fee schedule requirement to be reasonable and appropriate.

**18. If using a maximum fee schedule (option b in Question 16), please answer the following additional questions:**

- a.** ☐ Use the checkbox to provide the following assurance: In accordance with 42 C.F.R. § 438.6(c)(1)(iii)(C), the State has determined that the MCO, PIHP, or PAHP has retained the ability to reasonably manage risk and has discretion in accomplishing the goals of the contract.
- b.** Describe the process for plans and providers to request an exemption if they are under contract obligations that result in the need to pay more than the maximum fee schedule.
- c.** Indicate the number of exemptions to the requirement:
  - i.** Expected in this contract rating period (estimate)
  - ii.** Granted in past years of this payment arrangement
- d.** Describe how such exemptions will be considered in rate development.

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<sup>2</sup> Please note, per the 2020 Medicaid and CHIP final rule at 42 C.F.R. § 438.6(c)(1)(iii)(A), States no longer need to submit a preprint for prior approval to adopt minimum fee schedules that use State plan approved rates as defined in 42 C.F.R. § 438.6(a).

**19.** If the State is seeking prior approval for a uniform dollar or percentage increase (option c in Question 16), please address the following questions:

- a. Will the state require plans to pay a ☐ uniform dollar amount **or** a ☒ uniform percentage increase? (*Please select only one.*)
- b. What is the magnitude of the increase (e.g., \$4 per claim or 3% increase per claim?)

The maximum possible annual supplemental payment is determined prior to the start of each state fiscal year using the methodology described in Item 8. Based on the historical baseline data used to determine the maximum possible supplemental p

- c. Describe how will the uniform increase be paid out by plans (e.g., upon processing the initial claim, a retroactive adjustment done one month after the end of quarter for those claims incurred during that quarter).

MCO encounter data will be used to link payments to utilization by physician in each group. Medicaid MCOs are required to submit encounter data to the Virginia Department of Medical Assistance Services in accordance with formatting and timeliness standards set forth in their contracts with the State. Upon completion of a quarter, DMAS will retroactively calculate each physician's payment increase by MCO using valid encounters received during the previous quarter and sum those payments by physician group. DMAS will then issue a supplemental payment to each MCO based on the increase calculated for the MCO's enrollees. Due to the uniform percentage increase being calculated after the encounter has been received, the directed payments will occur retroactively.

- d. Describe how the increase was developed, including why the increase is reasonable and appropriate for network providers that provide a particular service under the contract

The uniform percentage is determined annually such that total annual directed payments to physicians that are a component of the qualifying private health system will be less than the ACR.

### SECTION III: PROVIDER CLASS AND ASSESSMENT OF REASONABLENESS

**20.** In accordance with 42 C.F.R. § 438.6(c)(2)(ii)(B), identify the class or classes of providers that will participate in this payment arrangement by answering the following questions:

- a. Please indicate which general class of providers would be affected by the state directed payment (check all that apply):

- ☐ inpatient hospital service
- ☐ outpatient hospital service
- ☒ professional services at an academic medical center
- ☒ primary care services
- ☒ specialty physician services
- ☐ nursing facility services
- ☐ HCBS/personal care services
- ☐ behavioral health inpatient services
- ☐ behavioral health outpatient services
- ☐ dental services
- ☐ Other:

- b. Please define the provider class(es) (if further narrowed from the general classes indicated above).

Physicians employed by or contracted by a private acute care type 2 hospital system with at least one level 2 trauma center as of January 2022 located in Lord Fairfax Health District and Northwest Health Planning Region.

- c. Provide a justification for the provider class defined in Question 20b (e.g., the provider class is defined in the State Plan.) If the provider class is defined in the State Plan, please provide a link to or attach the applicable State Plan pages to the preprint submission. Provider classes cannot be defined to only include providers that provide intergovernmental transfers.

The provider class defined in this preprint is defined in a State Plan Amendment that DMAS will submit to CMS for this supplemental payment program.

21. In accordance with 42 C.F.R. § 438.6(c)(2)(ii)(B), describe how the payment arrangement directs expenditures equally, using the same terms of performance, for the class or classes of providers (identified above) providing the service under the contract.

Under this payment arrangement, all physicians in the class providing services to Medicaid managed care enrollees will receive a uniform percentage increase for physician services. Health plan encounter data will be used to link payments to utilization of physician services for plan enrollees using the same methodology across the class.

22. For the services where payment is affected by the state directed payment, how will the state directed payment interact with the negotiated rate(s) between the plan and the provider? Will the state directed payment:

- a. ☐ Replace the negotiated rate(s) between the plan(s) and provider(s).  
b. ☐ Limit but not replace the negotiated rate(s) between the plans(s) and provider(s).  
c. ☒ Require a payment be made in addition to the negotiated rate(s) between the plan(s) and provider(s).

23. For payment arrangements that are intended to require plans to make a payment in addition to the negotiated rates (as noted in option c in Question 22), please provide an analysis in Table 2 showing the impact of the state directed payment on payment levels for each provider class. This provider payment analysis should be completed distinctly for each service type (e.g., inpatient hospital services, outpatient hospital services, etc.).

This should include an estimate of the base reimbursement rate the managed care plans pay to these providers as a percent of Medicare, or some other standardized measure, and the effect the increase from the state directed payment will have on total payment. *Ex: The average base payment level from plans to providers is 80% of Medicare and this SDP is expected to increase the total payment level from 80% to 100% of Medicare.*

If the state needs more space, please use Addendum 2.A and check this box: ☐

**TABLE 2: Provider Payment Analysis**

| Provider Class(es)                           | Average Base Payment Level from Plans to Providers (absent the SDP) | Effect on Total Payment Level of State Directed Payment (SDP) | Effect on Total Payment Level of Other SDPs | Effect on Total Payment Level of Pass-Through Payments (PTPs) | Total Payment Level (after accounting for all SDPs and PTPs) |
|----------------------------------------------|---------------------------------------------------------------------|---------------------------------------------------------------|---------------------------------------------|---------------------------------------------------------------|--------------------------------------------------------------|
| <i>Ex: Rural Inpatient Hospital Services</i> | 80%                                                                 | 20%                                                           | N/A                                         | N/A                                                           | 100%                                                         |
| a. Professional Services                     | 58.6%                                                               | 41.4%                                                         |                                             |                                                               | 100%                                                         |
| b.                                           |                                                                     |                                                               |                                             |                                                               |                                                              |
| c.                                           |                                                                     |                                                               |                                             |                                                               |                                                              |
| d.                                           |                                                                     |                                                               |                                             |                                                               |                                                              |
| e.                                           |                                                                     |                                                               |                                             |                                                               |                                                              |
| f.                                           |                                                                     |                                                               |                                             |                                                               |                                                              |
| g.                                           |                                                                     |                                                               |                                             |                                                               |                                                              |

24. Please indicate if the data provided in Table 2 above is in terms of a percentage of:

- a. ☐ Medicare payment/cost
- b. ☐ State-plan approved rates as defined in 42 C.F.R. § 438.6(a) (*Please note, this rate cannot include supplemental payments.*)
- c. ☒ Other; Please define: **Average Commercial Rate**

25. Does the State also require plans to pay any other state directed payments for providers eligible for the provider class described in Question 20b? ☐ Yes ☒ No

*If yes, please provide information requested under the column "Other State Directed Payments" in Table 2.*

- 26.** Does the State also require plans to pay pass-through payments as defined in 42 C.F.R. § 438.6(a) to any of the providers eligible for any of the provider class(es) described in Question 20b? ☐ Yes ☒ No

*If yes, please provide information requested under the column “Pass-Through Payments” in Table 2.*

- 27.** Please describe the data sources and methodology used for the analysis provided in response to Question 23.

Historical managed care encounters used for the values provided in the response to Question 23 have a date of service in state fiscal year 2023 and were billed by physicians employed by or affiliated with the qualifying private health system. Medicare Crossover claims were excluded.

Commercial payment amounts were calculated using a Medicare Equivalent of the Average Commercial Rate methodology as described in the response to Question 8.

- 28.** Please describe the State's process for determining how the proposed state directed payment was appropriate and reasonable.

The uniform percentage is determined annually such that total directed payments to physicians employed by or affiliated with the qualifying private health system will remain below the Medicaid ceiling calculated as described in the response to Question 8.

#### **SECTION IV: INCORPORATION INTO MANAGED CARE CONTRACTS**

- 29.** States must adequately describe the contractual obligation for the state directed payment in the state's contract with the managed care plan(s) in accordance with 42 C.F.R. § 438.6(c). Has the state already submitted all contract action(s) to implement this state directed payment? ☒ Yes ☐ No

**a.** If yes:

- i.** What is/are the state-assigned identifier(s) of the contract actions provided to CMS?

MCR-VA-CCMC-20240701-20250630-CERTIFICATION-20240703 and MCR-VA-0002-CCMC

- ii.** Please indicate where (page or section) the state directed payment is captured in the contract action(s).

The State Directed Payment language can be found in Section 12.1.6 of the FY25 CCMC contract

- b.** If no, please estimate when the state will be submitting the contract actions for review.

## SECTION V: INCORPORATION INTO THE ACTUARIAL RATE CERTIFICATION

*Note: Provide responses to the questions below for the first rating period if seeking approval for multi-year approval.*

**30.** Has/Have the actuarial rate certification(s) for the rating period for which this state directed payment applies been submitted to CMS? ☒ Yes ☐ No

**a.** If no, please estimate when the state will be submitting the actuarial rate certification(s) for review.

**b.** If yes, provide the following information in the table below for each of the actuarial rate certification review(s) that will include this state directed payment.

**Table 3: Actuarial Rate Certification(s)**

| Control Name Provided by CMS<br>(List each actuarial rate certification separately) | Date Submitted to CMS | Does the certification incorporate the SDP? | If so, indicate where the state directed payment is captured in the certification (page or section) |
|-------------------------------------------------------------------------------------|-----------------------|---------------------------------------------|-----------------------------------------------------------------------------------------------------|
| i. MCR-VA-CCMC-20240701-20250630-CERTIFICATION-20240703                             | 08/02/2024            | No                                          |                                                                                                     |
| ii.                                                                                 |                       |                                             |                                                                                                     |
| iii.                                                                                |                       |                                             |                                                                                                     |
| iv.                                                                                 |                       |                                             |                                                                                                     |
| v.                                                                                  |                       |                                             |                                                                                                     |

*Please note, states and actuaries should consult the most recent [Medicaid Managed Care Rate Development Guide](#) for how to document state directed payments in actuarial rate certification(s). The actuary's certification must contain all of the information outlined; if all required documentation is not included, review of the certification will likely be delayed.)*

**c.** If not currently captured in the State's actuarial certification submitted to CMS, note that the regulations at 42 C.F.R. § 438.7(b)(6) requires that all state directed payments are documented in the State's actuarial rate certification(s). CMS will not be able to approve the related contract action(s) until the rate certification(s) has/have been amended to account for all state directed payments. Please provide an estimate of when the State plans to submit an amendment to capture this information.

**31.** Describe how the State will/has incorporated this state directed payment arrangement in the applicable actuarial rate certification(s) (please select one of the options below):

- a. ☐ An adjustment applied in the development of the monthly base capitation rates paid to plans.
- b. ☒ Separate payment term(s) which are captured in the applicable rate certification(s) but paid separately to the plans from the monthly base capitation rates paid to plans.
- c. ☐ Other, please describe:

**32.** States should incorporate state directed payment arrangements into actuarial rate certification(s) as an adjustment applied in the development of the monthly base capitation rates paid to plans as this approach is consistent with the rate development requirements described in 42 C.F.R. § 438.5 and consistent with the nature of risk-based managed care. For state directed payments that are incorporated in another manner, particularly through separate payment terms, provide additional justification as to why this is necessary and what precludes the state from incorporating as an adjustment applied in the development of the monthly base capitation rates paid to managed care plans.

The reimbursement levels for physician services rendered by the provider class reflects the importance of these providers to Virginia's Medicaid program and such reimbursement levels may exceed negotiated rates between the health plans and other physicians. Maintaining the separate payment term approach mitigates concerns that health plans will divert utilization to other physician practices and supports network participation of these critical physician practices. If the value of the directed payment was incorporated in base capitation rates, there is the concern that utilization patterns for physician services will be negatively impacted and jeopardize the network status of the provider class.

**33.** ☒ In accordance with 42 C.F.R. § 438.6(c)(2)(i), the State assures that all expenditures for this payment arrangement under this section are developed in accordance with 42 C.F.R. § 438.4, the standards specified in 42 C.F.R. § 438.5, and generally accepted actuarial principles and practices.

## SECTION VI: FUNDING FOR THE NON-FEDERAL SHARE

**34.** Describe the source of the non-federal share of the payment arrangement. Check all that apply:

- a. ☐ State general revenue
- b. ☒ Intergovernmental transfers (IGTs) from a State or local government entity
- c. ☐ Health Care-Related Provider tax(es) / assessment(s)
- d. ☐ Provider donation(s)
- e. ☐ Other, specify:

**35.** For any payment funded by **IGTs (option b in Question 34)**,

- a. Provide the following (respond to each column for all entities transferring funds). If the state needs more space, please use Addendum Table 4.A and check this box: ☐

**Table 4: IGT Transferring Entities**

| <b>Name of Entities transferring funds (enter each on a separate line)</b> | <b>Operational nature of the Transferring Entity (State, County, City, Other)</b> | <b>Total Amounts Transferred by This Entity</b> | <b>Does the Transferring Entity have General Taxing Authority? (Yes or No)</b> | <b>Did the Transferring Entity receive appropriations? If not, put N/A. If yes, identify the level of appropriations</b> | <b>Is the Transferring Entity eligible for payment under this state directed payment? (Yes or No)</b> |
|----------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------|--------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
| <b>i.</b> Town of Woodstock                                                | Town                                                                              | \$ 461,124.00                                   | Yes                                                                            | N/A                                                                                                                      | No                                                                                                    |
| <b>ii.</b> City of Winchester                                              | City                                                                              | \$ 1,106,698.00                                 | Yes                                                                            | N/A                                                                                                                      | No                                                                                                    |
| <b>iii.</b>                                                                |                                                                                   |                                                 |                                                                                |                                                                                                                          |                                                                                                       |
| <b>iv.</b>                                                                 |                                                                                   |                                                 |                                                                                |                                                                                                                          |                                                                                                       |
| <b>v.</b>                                                                  |                                                                                   |                                                 |                                                                                |                                                                                                                          |                                                                                                       |
| <b>vi.</b>                                                                 |                                                                                   |                                                 |                                                                                |                                                                                                                          |                                                                                                       |
| <b>vii.</b>                                                                |                                                                                   |                                                 |                                                                                |                                                                                                                          |                                                                                                       |
| <b>viii.</b>                                                               |                                                                                   |                                                 |                                                                                |                                                                                                                          |                                                                                                       |
| <b>ix.</b>                                                                 |                                                                                   |                                                 |                                                                                |                                                                                                                          |                                                                                                       |
| <b>x.</b>                                                                  |                                                                                   |                                                 |                                                                                |                                                                                                                          |                                                                                                       |

- b.** ☒ Use the checkbox to provide an assurance that no state directed payments made under this payment arrangement funded by IGTs are dependent on any agreement or arrangement for providers or related entities to donate money or services to a governmental entity.
- c.** Provide information or documentation regarding any written agreements that exist between the State and healthcare providers or amongst healthcare providers and/or related entities relating to the non-federal share of the payment arrangement. This should include any written agreements that may exist with healthcare providers to support and finance the non-federal share of the payment arrangement. Submit a copy of any written agreements described above.

DMAS will require an IAG with each entity prior to implementation.

**36. For any state directed payments funded by provider taxes/assessments (option c in Question 34),**

- a.** Provide the following (respond to each column for all entries). If there are more entries than space in the table, please provide an attachment with the information requested in the table.

**Table 5: Health Care-Related Provider Tax/Assessment(s)**

| <b>Name of the Health Care-Related Provider Tax / Assessment (enter each on a separate line)</b> | <b>Identify the permissible class for this tax / assessment</b> | <b>Is the tax / assessment broad-based?</b> | <b>Is the tax / assessment uniform?</b> | <b>Is the tax / assessment under the 6% indirect hold harmless limit?</b> | <b>If not under the 6% indirect hold harmless limit, does it pass the “75/75” test?</b> | <b>Does it contain a hold harmless arrangement that guarantees to return all or any portion of the tax payment to the tax payer?</b> |
|--------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|---------------------------------------------|-----------------------------------------|---------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| <b>i.</b>                                                                                        |                                                                 |                                             |                                         |                                                                           |                                                                                         |                                                                                                                                      |
| <b>ii.</b>                                                                                       |                                                                 |                                             |                                         |                                                                           |                                                                                         |                                                                                                                                      |
| <b>iii.</b>                                                                                      |                                                                 |                                             |                                         |                                                                           |                                                                                         |                                                                                                                                      |
| <b>iv.</b>                                                                                       |                                                                 |                                             |                                         |                                                                           |                                                                                         |                                                                                                                                      |
| <b>v.</b>                                                                                        |                                                                 |                                             |                                         |                                                                           |                                                                                         |                                                                                                                                      |

- b.** If the state has any waiver(s) of the broad-based and/or uniform requirements for any of the health care-related provider taxes/assessments, list the waiver(s) and its current status:

**Table 6: Health Care-Related Provider Tax/Assessment Waivers**

| <b>Name of the Health Care-Related Provider Tax/Assessment Waiver<br/>(enter each on a separate line)</b> | <b>Submission Date</b> | <b>Current Status<br/>(Under Review, Approved)</b> | <b>Approval Date</b> |
|-----------------------------------------------------------------------------------------------------------|------------------------|----------------------------------------------------|----------------------|
| <b>i.</b>                                                                                                 |                        |                                                    |                      |
| <b>ii.</b>                                                                                                |                        |                                                    |                      |
| <b>iii.</b>                                                                                               |                        |                                                    |                      |
| <b>iv.</b>                                                                                                |                        |                                                    |                      |
| <b>v.</b>                                                                                                 |                        |                                                    |                      |

**37.** For any state directed payments funded by **provider donations (option d in Question 34)**, please answer the following questions:

- a.** Is the donation bona-fide? ☐ Yes ☐ No
- b.** Does it contain a hold harmless arrangement to return all or any part of the donation to the donating entity, a related entity, or other provider furnishing the same health care items or services as the donating entity within the class?  
☐ Yes ☐ No

**38.** ☒ **For all state directed payment arrangements**, use the checkbox to provide an assurance that in accordance with 42 C.F.R. § 438.6(c)(2)(ii)(E), the payment arrangement does not condition network provider participation on the network provider entering into or adhering to intergovernmental transfer agreements.

## SECTION VII: QUALITY CRITERIA AND FRAMEWORK FOR ALL PAYMENT ARRANGEMENTS

39. ☒ Use the checkbox below to make the following assurance, “In accordance with 42 C.F.R. § 438.6(c)(2)(ii)(C), the State expects this payment arrangement to advance at least one of the goals and objectives in the quality strategy required per 42 C.F.R. § 438.340.”
40. Consistent with 42 C.F.R. § 438.340(d), States must post the final quality strategy online beginning July 1, 2018. Please provide:
- a. A hyperlink to State’s most recent quality strategy: <https://www.dmas.virginia.gov/media/yzdaqzgr/2026-2028-quality-strategy.pdf>
  - b. The effective date of quality strategy. October 3, 2025
41. If the State is currently updating the quality strategy, please submit a draft version, and provide:
- a. A target date for submission of the revised quality strategy (month and year):
  - b. Note any potential changes that might be made to the goals and objectives.

*Note: The State should submit the final version to CMS as soon as it is finalized. To be in compliance with 42 C.F.R. § 438.340(c)(2) the quality strategy must be updated no less than once every 3-years.*

- 42.** To obtain written approval of this payment arrangement, a State must demonstrate that each state directed payment arrangement expects to advance at least one of the goals and objectives in the quality strategy. In the Table 7 below, identify the goal(s) and objective(s), as they appear in the Quality Strategy (include page numbers), this payment arrangement is expected to advance. If additional rows are required, please attach.

**Table 7: Payment Arrangement Quality Strategy Goals and Objectives**

| Goal(s)                                                                                   | Objective(s)                                                                                                                                                                                                   | Quality strategy page |
|-------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| <i>Example: Improve care coordination for enrollees with behavioral health conditions</i> | <i>Example: Increase the number of managed care patients receiving follow-up behavior health counseling by 15%</i>                                                                                             | 5                     |
| a. Goal 2: Promote Access to Safe, Gold-Standard Patient Care.                            | Quality Strategy Objective 2.1: Ensure Access to Care<br><br>Directed Payment Objective: Monitor chronic condition hospitalizations (based on AHRQ PQI-90)                                                     | 14                    |
| b. Goal 3: Support Efficient and Value-Driven Care.                                       | Quality Strategy Objective 3.2: Promote Efficient Use of Program Funds<br><br>Directed Payment Objective: Increase the percent of nurses retained by the health system year after year                         | 14                    |
| c. Goal 4: Strengthen the Health of Families and Communities.                             | Quality Strategy Objective 4.2: Improve Outcomes for Maternal and Infant Members<br><br>Directed Payment Objective: Increase access to OB-trained providers on nights and weekends                             | 14                    |
| d. Goal 5: Providing Whole-Person Care for Vulnerable Populations                         | Quality Strategy Objective 5.4: Improve Behavioral Health Development Services of Members<br><br>Directed Payment Objective: Increase appropriate screening and intervention according to SBIRT specifications | 14                    |

- 43.** Describe how this payment arrangement is expected to advance the goal(s) and objective(s) identified in Table 7. If this is part of a multi-year effort, describe this both in terms of this year's payment arrangement and in terms of that of the multi-year payment arrangement.

This payment arrangement is to encourage continued participation of these physicians in serving the healthcare needs of Medicaid recipients by ensuring adequate resources are available to support the provision of quality care, including the effective management of those with chronic conditions. DMAS will evaluate the effectiveness of this plan at least annually to determine if any changes need to be taken by the participating health systems.

**44.** Please complete the following questions regarding having an evaluation plan to measure the degree to which the payment arrangement advances at least one of the goals and objectives of the State's quality strategy. To the extent practicable, CMS encourages States to utilize existing, validated, and outcomes-based performance measures to evaluate the payment arrangement, and recommends States use the [CMS Adult and Child Core Set Measures](#), when applicable.

- a.** ☒ In accordance with 42 C.F.R. § 438.6(c)(2)(ii)(D), use the checkbox to assure the State has an evaluation plan which measures the degree to which the payment arrangement advances at least one of the goals and objectives in the quality strategy required per 42 C.F.R. § 438.340, and that the evaluation conducted will be *specific* to this payment arrangement. *Note:* States have flexibility in how the evaluation is conducted and may leverage existing resources, such as their 1115 demonstration evaluation if this payment arrangement is tied to an 1115 demonstration or their External Quality Review validation activities, as long as those evaluation or validation activities are *specific* to this payment arrangement and its impacts on health care quality and outcomes.

- b. Describe how and when the State will review progress on the advancement of the State's goal(s) and objective(s) in the quality strategy identified in Question 42. For each measure the State intends to use in the evaluation of this payment arrangement, provide in Table 8 below: 1) the baseline year, 2) the baseline statistics, and 3) the performance targets the State will use to track the impact of this payment arrangement on the State's goals and objectives. Please attach the State's evaluation plan for this payment arrangement.

**TABLE 8: Evaluation Measures, Baseline and Performance Targets**

| Measure Name and NQF #<br>(if applicable)                                                    | Baseline Year       | Baseline Statistic                                                           | Performance Target                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Notes <sup>1</sup>   |
|----------------------------------------------------------------------------------------------|---------------------|------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
| <i>Example: Flu Vaccinations for Adults Ages 19 to 64 (FVA-AD); NQF # 0039</i>               | <i>CY 2019</i>      | <i>34%</i>                                                                   | <i>Increase the percentage of adults 18–64 years of age who report receiving an influenza vaccination by 1 percentage point per year</i>                                                                                                                                                                                                                                                                                                                                                                                                  | <i>Example notes</i> |
| i. Chronic Health Condition Management (Based on AHRQ PQI 90)                                | FY 2023             | 13.4% (451 discharges with chronic conditions out of 3,356 total discharges) | Performance payment based on period over period improvement until a specific threshold is met. Once the threshold is met the health system needs to maintain to receive 100% payment. Threshold will be established after additional reporting periods.<br><br>25%: If decrease by .25<br>50%: If decrease by .50<br>75%: If decrease by .75<br>100%: If decrease by 1.00                                                                                                                                                                 |                      |
| ii. Nursing Retention and Turnover                                                           | CY 2024             | 87.87% (1,166 of 1,327)<br><br>9.26% (20 of 216)                             | Performance payment based on period over period improvement until a specific threshold is met. Once the threshold is met the health system needs to maintain to receive 100% payment. Threshold will be established after additional reporting periods.<br><br>Turnover Rate<br>100%: Lower than 10.5%<br>75%: 13.0% to greater than 10.5%<br>50%: 15.7% to greater than 13.0%<br>25%: 18.7% to greater than 15.7%<br><br>Retention Rate<br>25%: increase by 1%<br>50%: increase by 1.5%<br>75%: increase by 2%<br>100%: increase by 2.5% |                      |
| iii. Maternity After-Hours Access (Pre- and Postnatal)                                       | CY 2024             | 0% (No service locations reported any service time slot)                     | Performance payment achieved based on reported after-hours availability in the current measurement period. Numerator (number of after-hours time frames with staffing) and denominator (total number of after-hours time frames possible). Full payment will be earned upon achieving 60% of the time slots available.                                                                                                                                                                                                                    |                      |
| iv. Substance Use Disorder - Screening, Brief Intervention and Referral to Treatment (SBIRT) | 1st half of FY 2026 | 0%                                                                           | Incremental year-over-year improvement (5% increase annually) until full implementation across the eligible population is achieved. Full payment will be earned upon achieving the 5% increase.                                                                                                                                                                                                                                                                                                                                           |                      |

1. If the State will deviate from the measure specification, please describe here. If a State-specific measure will be used, please define the numerator and denominator here. Additionally, describe any planned data or measure stratifications (for example, age, race, or ethnicity) that will be used to evaluate the payment arrangement.

- c. If this is any year other than year 1 of a multi-year effort, describe (or attach) prior year(s) evaluation findings and the payment arrangement's impact on the goal(s) and objective(s) in the State's quality strategy. Evaluation findings must include 1) historical data; 2) prior year(s) results data; 3) a description of the evaluation methodology; and 4) baseline and performance target information from the prior year(s) preprint(s) where applicable. If full evaluation findings from prior year(s) are not available, provide partial year(s) findings and an anticipated date for when CMS may expect to receive the full evaluation findings.

1. Historical Data

There is no historical data other than the prior year's data (below).

2. Prior Year(s) (first half of SFY '26) Results Data

- PQI 90 Rate: 13.9% (462 discharges with chronic conditions out of 3,320 total discharges)

- Retention and turnover:

o Retention Rate: 89.20% (966 out of 1,083 personnel)

o Turnover Rate: 0% (0 out of 170 hires)

o Additionally, eligible systems attested to developing, implementing, or maintaining hospital-wide nursing outreach and retention strategies as required by the measure.

- SBIRT

o Completion Rate: 0.00%

o 79.48% staff trained (51/268)

- Maternity After-Hours Access: 0% (No service locations reported any service time slot)

3. Description of the Evaluation Methodology

Evaluation of each measure is based on self-reported quantitative and qualitative data submitted by eligible systems for the for the 12-month reporting year. Each performance area includes specific numerator and denominator definitions and, where relevant, calculation methodologies for rates.

- Chronic Health Condition Management: The PQI 90 rate is calculated as the number of Medicaid inpatient discharges with evidence of one or more of the included chronic conditions (numerator) divided by the total number of Medicaid inpatient discharges within the health system (denominator), multiplied by 100.

- Nursing Retention and Turnover: Nursing Retention and Turnover: The nursing retention rate is calculated as the number of registered nurse (RN) employees who remained employed at the end of the calculation period ( " stayers " ) divided by the number of RN employees who were employed at the beginning of the period, multiplied by 100. This includes only RNs providing direct patient care in a hospital setting and excludes planned retirements, travel nurses, and military-related relocations.

The nursing turnover rate is calculated as the number of newly hired RN employees who voluntarily left the organization ( " leavers " ) during the calculation period divided by the total number of RN hires during the same period, multiplied by 100. This metric similarly excludes planned retirements, travel nurses, and military relocations.

- Maternity After-Hours Access (Pre-and Postpartum): The evaluation is based on attesting to service availability at three time slots: weekend hours and two weekday evening time windows.

- Substance Use Disorder - SBIRT (Screening, Brief Intervention, and Referral to Treatment): This evaluation is based on reporting the number of eligible staff who completed SBIRT training relative to the number of personnel eligible for training. The SBIRT Completion Rate is calculated as the sum of staff trained during the measurement period, divided by the total number of eligible personnel, and multiplied by 100.

4. Baseline and Performance Target Information from Prior Year(s)

Baseline data was collected in Year 1 for both the Chronic Conditions Management, Nursing Retention and Turnover, and Maternity After-Hours Access measures.

- Chronic Condition Management (Year 1): 13.4% (451 discharges with chronic conditions out of 3,356 total discharges)

- Nursing Retention Rate (Year 1): 87.87% (1,166 of 1,327)

- Nursing Turnover Rate (Year 1): 9.26% (20 of 216)

- Maternity After-Hours Access (Year 1): 0% (No service locations reported any service time slot)

For the SBIRT Completion Rate, no baseline data exists for Year 1. The data reported in Year 2 will serve as the initial benchmark for future tracking and goal setting. SBIRT training Completion Rate: 73.99%