

**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 DY4 Q4</i>
Reporting period	<i>10/01/2024 – 12/31/2024</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 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 was implemented in the state on July 1, 2021. This change allows newly eligible adults access to Medicaid physical and mental health services and providers previously unavailable to them.

SB 1337 was signed into state law on May 26, 2022. This bill requires implementation of managed care for most Medicaid populations by October 1, 2023, or upon CMS approval. The State implemented managed care on February 1, 2024, for prepaid ambulatory health plans (PAHP) dental program and on April 1, 2024, for managed care organization (MCO) Medical and Children's Specialty programs in partnership with CMS.

The State continues to work with providers and partners to expand access to vital behavioral health services and strengthen and improve coordination of the statewide network. 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 crisis number that was launched in July 2022. During this reporting period, the State experienced a 30-day average call volume of approximately 6,100 calls. Part of this effort also includes expansion of crisis services within Urgent Recovery Clinics (URCs) in strategic areas of the state.

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:	X		
1.2.1a. The licensure or accreditation processes for participating hospitals and residential settings			
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	X		
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.			Medicaid expansion was implemented on July 1, 2021.

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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.		<i>Annual Metric 7, 8, 9, 10</i> <i>Increases greater than 2 percent: Follow-up After Hospitalization for Mental Illness: Age 18 and Older (FUH-AD) - 30 days; 7 days; Follow-up After Emergency Department Visit for Alcohol and Other Drug Abuse or Dependence: Age 18 and Older - 7 days; Follow-Up After Emergency Department Visit for Mental Illness: Age 18 and Older - 30-days; 7 days</i> <i>Annual Metric 7</i> <i>Decreases greater than 2 percent: Follow-up After Hospitalization for Mental Illness: Ages 6 to 17 (FUH-CH) - 30 days</i> <i>The State is encouraged by increases in these measures, with the highest increase seen in annual metric 10. We will continue to monitor annual metric 7.</i>	
2.2. Implementation update			
2.2.1. Compared to the demonstration design and operational details, the state expects to make the following changes to:	X		
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			
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	X		

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Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
2.2.1d. 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		
2.2.2. The state expects to make other program changes that may affect metrics related to Milestone 2.			Medicaid expansion was implemented on July 1, 2021.
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.		<i>Monthly Metric 13, 14, 16, 17</i> <i>Annual Metric 19a, 19b</i> <i>Monthly Metric 15, 18</i>	<i>Increases greater than 2 percent: MH Service Utilization – Inpatient; Intensive Outpatient and Partial Hospitalization; ED; Telehealth</i> <i>Decreases greater than 2 percent: Average length of stay (ALOS) for beneficiaries with SMI discharged from an inpatient or residential stay in an IMD (all rates)</i> <i>Decreases greater than 2 percent: MH Service Utilization – Outpatient; Any Services</i> <i>The State is encouraged by the decrease in ALOS among all rates, with the highest decrease seen in ALOS for long-term stays. Service utilization trends appear to reflect reasonable variations, with the most significant trend related to increased utilization of telehealth services.</i>

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Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
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.			Medicaid expansion was implemented on July 1, 2021.
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.		Annual Metric 29 Monthly Metric 21	Increases greater than 2 percent: Metabolic Monitoring for Children and Adolescents on Antipsychotics (all measures) Decrease greater than 2 percent: Count of Beneficiaries with SMI/SED (monthly) The decrease noted appears to be related to regular churn within the Medicaid program, and the State will continue to monitor.
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.			Medicaid expansion was implemented on July 1, 2021.
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 is implementing an eCQM dashboard, this project is currently in a pilot phase and still projected to be operational Q4 of 2024. Initially, this will be based on claims data only with the future plans to incorporate clinical data from the HIE.</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 was implemented on 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.	X											
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		As of this reporting quarter, this is not an item that is being pursued within private hospitals due to operational challenges.										
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.		SFY 24 <table><tr><th>Medicaid Program</th><th>State Dollars</th></tr><tr><td>Regular TXIX</td><td>\$63,511,967</td></tr><tr><td>CHIP</td><td>\$15,305,612</td></tr><tr><td>CCBHC</td><td>\$63,585,021</td></tr><tr><td>Total</td><td>\$142,402,600</td></tr></table>	Medicaid Program	State Dollars	Regular TXIX	\$63,511,967	CHIP	\$15,305,612	CCBHC	\$63,585,021	Total	\$142,402,600
Medicaid Program	State Dollars											
Regular TXIX	\$63,511,967											
CHIP	\$15,305,612											
CCBHC	\$63,585,021											
Total	\$142,402,600											
8.2. Narrative information												

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Prompt	State has no trends/update to report (place an X)	State response
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.		<i>The total amount for SFY 24 represents an increase to SFY 23 due in part to CCBHC expansion.</i>
9. SMI/SED financing plan		
9.1. Implementation update		
9.1.1. Compared to the demonstration design and operational details, the state expects to make the following changes to: 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		<i>With the launch of the national 988 crisis number, the ODMHSAS is serving as the central organizing body for the comprehensive, statewide crisis response system in Oklahoma. The system integrates the national 988 number with the statewide crisis call center system, which provides triage and referral for all callers. Mobile crisis teams are also available across the state to address callers' needs when appropriate. The system also assists law enforcement to appropriately refer and manage crisis situations.</i>
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	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. State staff continue to support the independent evaluator to ensure necessary data is included for the upcoming budget neutrality quarterly report. The budget neutrality design for this 1115 waiver demonstration was submitted on March 27th, 2025, for the upcoming budget neutrality quarterly report.</i> <i>Additionally, the State requested technical assistance from CMS on November 7, 2024, to clarify whether SoonerSelect 1915b enrollees who receive IMD services should be included in the 1115 IMD Demonstration population for purposes of budget neutrality reporting. If so, how should these costs be reported?</i> <i>We have identified three options for review with CMS, the first of which seems most appropriate, as it represents actual State expenditures:</i> <i>1. State MCE capitation payments in the months when a SoonerSelect member received treatment in an IMD);</i> <i>2. The portion of MCE capitation payments specific to IMD services, multiplied by all SoonerSelect member months; or</i> <i>3. Actual MCE expenditures, as derived from encounter data (which may be incomplete and subject to later revision).</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>

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Prompt	State has no trends/update to report (place an X)	State response
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.	X	
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	
11.2.2. The state is working on other initiatives related to SMI/SED.		<i>With the launch of the national 988 crisis number, the ODMHSAS is serving as the central organizing body for the comprehensive, statewide crisis response system in Oklahoma. The system integrates the national 988 number with the statewide crisis call center system, which provides triage and referral for all callers. Mobile crisis teams are also available across the state to address callers' needs when appropriate. The system also assists 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 supports efforts to meet Milestone 1 & 3. The expanded crisis call line supports the State's efforts to meet Milestone 3.</i>

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Prompt	State has no trends/update to report (place an X)	State response
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)	X	
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.		<i>During this reporting period, the State's independent evaluator, Pacific Health Policy Group (PHPG, completed the mid-point assessment. The State submitted the mid-point assessment to CMS on December 18, 2024.</i>
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>During this reporting period, the State's independent evaluator, Pacific Health Policy Group (PHPG, completed the mid-point assessment. The State submitted the mid-point assessment to CMS on December 18, 2024.</i>
12.1.3. List anticipated evaluation-related deliverables related to this demonstration and their due dates.		<i>The interim evaluation report was due on December 31, 2024, or with the renewal application due June 30, 2025. The summative evaluation report is due on June 30, 2027.</i>

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Prompt	State has no trends/update to report (place an X)	State response
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	
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.	X	

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Prompt	State has no trends/update to report (place an X)	State response
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.”