

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

State	District of Columbia.
Demonstration name	Behavioral Health Transformation
Approval date for demonstration	11/06/2019
Approval period for SUD	01/01/2020 – 12/31/2024
Approval date for SUD, if different from above	Click here to enter text.
Implementation date of SUD, if different from above	Click here to enter text..
SUD (or if broader demonstration, then SUD - related) demonstration goals and objectives	The goal of the demonstration is for the District to maintain and enhance access to opioid use disorder (OUD) and other substance use disorder (SUD) services; and continue delivery system improvements to provide more coordinated and comprehensive treatment for Medicaid beneficiaries with SUD. This demonstration authorizes the District to receive federal financial participation (FFP) for delivering high-quality, clinically appropriate treatment to beneficiaries diagnosed with SUD and receiving treatment while they are short-term residents in settings that qualify as Institutions for Mental Diseases (IMD). This demonstration also complements the District’s efforts to implement models of care that are focused on increasing supports for individuals outside of institutions, in home and community-based settings (HCBS) to improve their access to SUD services at varied levels of intensity, and to combat OUD and other SUDs among District residents.

2. Executive Summary

The District is working toward implementing payments for IMD services for individuals with SUD, along with implementing many of the new community-based behavioral health services in the Demonstration. The District used Rulemakings to establish Medicaid payments for IMDs, repealed the \$1 copay requirement for medication-assisted therapy, and established payment for recovery support services (RSS).

Near the end of Q1, the COVID-19 public health emergency affected waiver implementation. To ensure continued access to behavioral health services, the District issued a rulemaking authorizing home as an eligible originating site for telehealth. For the duration of the public health emergency, DHCF temporarily authorized payment for audio-only telehealth services. Many District IMD providers ceased admissions or decreased patient volume to ensure the safety of their clients near the end of Q1. We believe the COVID-19 public health emergency will continue affecting implementation of the Demonstration going into future quarters.

The District's demonstration has led to improved dialogue and understanding between stakeholders and the District's government. Between the award of the waiver and the end of Q1, the District hosted approximately 21 meetings with stakeholders to explain the Demonstration. The District also led other communications about the Demonstration informally or through email. These communications not only increased stakeholders' awareness of Demonstration services, they led to a greater understanding from all parties about gaps in the District's behavioral health system.

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

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
1.2 Assessment of Need and Qualification for SUD Services			
1.2.1 Metric Trends			
<input type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to assessment of need and qualification for SUD services.			
<input checked="" type="checkbox"/> The state has no metrics trends to report for this reporting topic.			
1.2.2 Implementation Update			
Compared to the demonstration design and operational details, the state expects to make the following changes to: <ul style="list-style-type: none"> <input type="checkbox"/> i) The target population(s) of the demonstration <input type="checkbox"/> ii) The clinical criteria (e.g., SUD diagnoses) that qualify a beneficiary for the demonstration 			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input type="checkbox"/> The state expects to make other program changes that may affect metrics related to assessment of need and qualification for SUD services			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
2.2 Access to Critical Levels of Care for OUD and other SUDs (Milestone 1)			
2.2.1 Metric Trends			
<input type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 1			
<input checked="" type="checkbox"/> The state has no metrics trends to report for this reporting topic.			

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
2.2.2 Implementation Update			
<p>Compared to the demonstration design and operational details, the state expects to make the following changes to:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> i) Planned activities to improve access to SUD treatment services across the continuum of care for Medicaid beneficiaries (e.g. outpatient services, intensive outpatient services, medication assisted treatment, services in intensive residential and inpatient settings, medically supervised withdrawal management) <input type="checkbox"/> ii) SUD benefit coverage under the Medicaid state plan or the Expenditure Authority, particularly for residential treatment, medically supervised withdrawal management, and medication assisted treatment services provided to individuals in IMDs 	<p>i) On February 18, 2020, DBH adopted an emergency rulemaking that requires all treatment providers provide intake and assessment services to ensure clients are able to visit any treatment provider and receive same-day assessment and placement in the appropriate level of care.</p>	<p>i) 01/01/2020 – 03/31/2020</p>	<p>i) N/A</p>
<p><input type="checkbox"/> The state has no implementation update to report for this reporting topic.</p>			
<p><input checked="" type="checkbox"/> The state expects to make other program changes that may affect metrics related to Milestone 1</p>	<p>Due to the COVID-19 public health emergency, utilization of in-person substance use disorder services may decrease. At the same time, utilization of telehealth services related to substance use disorder may increase. DHCF also issued updated regulations regarding Medicaid-reimbursable telehealth services allowing home as an eligible originating site which may also increase utilization of telehealth services related to substance use disorder. Finally, for the duration of the public health emergency, DHCF temporarily authorized payment for audio-only telehealth services which may also increase utilization of telehealth services related to substance use disorder.</p>	<p>01/01/2020 – 03/31/2020</p>	<p>#6, #7, #8, #9, #10, #11, #12</p>
<p><input type="checkbox"/> The state has no implementation update to report for this reporting topic.</p>			

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
3.2 Use of Evidence-based, SUD-specific Patient Placement Criteria (Milestone 2)			
3.2.1 Metric Trends			
<input type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 2			
<input type="checkbox"/> The state has no trends to report for this reporting topic.			
<input checked="" type="checkbox"/> The state is not reporting metrics related to Milestone 2.			
3.2.2 Implementation Update			
<p>Compared to the demonstration design and operational details, the state expects to make the following changes to:</p> <input type="checkbox"/> i) Planned activities to improve providers' use of evidence-based, SUD-specific placement criteria			
<input type="checkbox"/> ii) Implementation of a utilization management approach to ensure (a) beneficiaries have access to SUD services at the appropriate level of care, (b) interventions are appropriate for the diagnosis and level of care, or (c) use of independent process for reviewing placement in residential treatment settings			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input type="checkbox"/> The state expects to make other program changes that may affect metrics related to Milestone 2			
<input type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input checked="" type="checkbox"/> The state is not reporting metrics related to Milestone 2.			

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
4.2 Use of Nationally Recognized SUD-specific Program Standards to Set Provider Qualifications for Residential Treatment Facilities (Milestone 3)			
4.2.1 Metric Trends			
<input type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 3			
<input type="checkbox"/> The state has no trends to report for this reporting topic.			
<input checked="" type="checkbox"/> The state is not reporting metrics related to Milestone 3.			
4.2.2 Implementation Update			
Compared to the demonstration design and operational details, the state expects to make the following changes to: <ul style="list-style-type: none"> <input type="checkbox"/> i) Implementation of residential treatment provider qualifications that meet the ASAM Criteria or other nationally recognized, SUD-specific program standards <input type="checkbox"/> ii) State review process for residential treatment providers' compliance with qualifications standards <input checked="" type="checkbox"/> iii) Availability of medication assisted treatment at residential treatment facilities, either on-site or through facilitated access to services off site 	iii) On February 18, 2020, DBH adopted an emergency rulemaking that requires all residential treatment facilities to provide on-site or facilitate access to all Food and Drug Administration approved medication used in medication assisted treatment.	iii) 01/01/2020 – 03/31/2020	iii) N/A
<input type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input type="checkbox"/> The state expects to make other program changes that may affect metrics related to Milestone 3			
<input type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input checked="" type="checkbox"/> The state is not reporting metrics related to Milestone 3.			

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
5.2 Sufficient Provider Capacity at Critical Levels of Care including for Medication Assisted Treatment for OUD (Milestone 4)			
5.2.1 Metric Trends			
<input type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 4			
<input checked="" type="checkbox"/> The state has no trends to report for this reporting topic.			
5.2.2 Implementation Update			
Compared to the demonstration design and operational details, the state expects to make the following changes to: <input type="checkbox"/> Planned activities to assess the availability of providers enrolled in Medicaid and accepting new patients in across the continuum of SUD care			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input type="checkbox"/> The state expects to make other program changes that may affect metrics related to Milestone 4			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
6.2 Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and OUD (Milestone 5)			
6.2.1 Metric Trends			
<input type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 5			
<input checked="" type="checkbox"/> The state has no trends to report for this reporting topic.			

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
6.2.2 Implementation Update			
Compared to the demonstration design and operational details, the state expects to make the following changes to: <input checked="" type="checkbox"/> i) Implementation of opioid prescribing guidelines and other interventions related to prevention of OUD <input checked="" type="checkbox"/> ii) Expansion of coverage for and access to naloxone	i) DC Health and DBH conducted an extensive public awareness campaign regarding prescription-related opioid use, which resulted in more than 2.25 million impressions, or unique views. ii) Various outreach teams distribute naloxone kits as they connect with individuals in the community. In addition, 28 private pharmacies and 3 methadone clinics are receiving free naloxone kits to distribute to the public. Three naloxone trainings and one community conversation were conducted and an online training institute offers a naloxone education course.	i) 01/01/2020 – 03/31/2020 ii) 01/01/2020 – 03/31/2020	i) N/A ii) N/A
<input type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input type="checkbox"/> The state expects to make other program changes that may affect metrics related to Milestone 5			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
7.2 Improved Care Coordination and Transitions between Levels of Care (Milestone 6)			
7.2.1 Metric Trends			
<input type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 6			
<input checked="" type="checkbox"/> The state has no trends to report for this reporting topic.			
7.2.2 Implementation Update			
Compared to the demonstration design and operational details, the state expects to make the following changes to: <input type="checkbox"/> Implementation of policies supporting beneficiaries' transition from residential and inpatient facilities to community-based services and supports			

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input type="checkbox"/> The state expects to make other program changes that may affect metrics related to Milestone 6			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
8.2 SUD Health Information Technology (Health IT)			
8.2.1 Metric Trends			
<input type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to its Health IT metrics			
<input checked="" type="checkbox"/> The state has no trends to report for this reporting topic.			

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

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
9.2 Other SUD-Related Metrics			
9.2.1 Metric Trends			
<input type="checkbox"/> The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to other SUD-related metrics			
<input checked="" type="checkbox"/> The state has no trends to report for this reporting topic.			
9.2.2 Implementation Update			
<input type="checkbox"/> The state expects to make other program changes that may affect metrics related to other SUD-related metrics			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
10.2 Budget Neutrality			
10.2.1 Current status and analysis			
<input checked="" type="checkbox"/> If the SUD component is part of a broader demonstration, the state should provide an analysis of the SUD-related budget neutrality and an analysis of budget neutrality as a whole. Describe the current status of budget neutrality and an analysis of the budget neutrality to date.	The SUD component of the District’s budget neutrality demonstration is broken into two Medicaid Eligibility Groups (MCO and FFS populations). The FFS MEG is higher than the current PMPM limit by 69% due to detox utilization being significantly higher than estimated. The MCO MEG was significantly lower than PMPM cap.		
10.2.2 Implementation Update			
<input type="checkbox"/> The state expects to make other program changes that may affect budget neutrality			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
11.1 SUD-Related Demonstration Operations and Policy			
11.1.1 Considerations			
<input type="checkbox"/> States should highlight significant SUD (or if broader demonstration, then SUD-related) demonstration operations or policy considerations that could positively or negatively affect beneficiary enrollment, access to services, timely provision of services, budget neutrality, or any other provision that has potential for beneficiary impacts. Also note any activity that may accelerate or create delays or impediments in achieving the SUD demonstration’s approved goals or objectives, if not already reported elsewhere in this document. See report template instructions for more detail.			
<input checked="" type="checkbox"/> The state has no related considerations to report for this reporting topic.			
11.1.2 Implementation Update			
Compared to the demonstration design and operational details, the state expects to make the following changes to: <ul style="list-style-type: none"> <input type="checkbox"/> i) How the delivery system operates under the demonstration (e.g. through the managed care system or fee for service) <input type="checkbox"/> ii) Delivery models affecting demonstration participants (e.g. Accountable Care Organizations, Patient Centered Medical Homes) <input type="checkbox"/> iii) Partners involved in service delivery 			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
<input type="checkbox"/> The state experienced challenges in partnering with entities contracted to help implement the demonstration (e.g., health plans, credentialing vendors, private sector providers) and/or noted any performance issues with contracted entities			
<input checked="" type="checkbox"/> The state has no implementation update to report for this reporting topic.			
<input checked="" type="checkbox"/> The state is working on other initiatives related to SUD or OUD	<p>The District received a SUPPORT Section 1003 planning grant to increase the treatment capacity of Medicaid providers to deliver substance use disorder treatment and recovery services.</p> <p>Through support from the first State Opioid Response (SOR) grant, the District increased access to MAT and expanded the array of SUD treatment and recovery support services. The District will apply for a second SOR grant to continue many of these initiatives.</p>	01/01/2020 – 03/31/2020	N/A
<input type="checkbox"/> The state has no implementation update to report for this reporting topic.			

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
<input checked="" type="checkbox"/> The initiatives described above are related to the SUD or OUD demonstration (States should note similarities and differences from the SUD demonstration)	<p>The SUPPORT Section 1003 planning grant complements the 1115 SUD demonstration. The funding allows the District to support behavioral health transformation in several ways:</p> <ul style="list-style-type: none"> • Conduct a comprehensive needs assessment of Medicaid provider capacity to diagnose and treat SUD • Provide education and technical assistance among Medicaid providers to build provider capacity to treat individuals with SUD in community settings • Build critical infrastructure to support appropriate, privacy-preserving information exchange <p>The SOR 2 grant would complement the 1115 SUD demonstration. The funding would allow the District to support behavioral health transformation in several ways:</p> <ul style="list-style-type: none"> • Increase entry points into the system of care (e.g., mobile screening and MAT in high need communities) • Coordinate care as individuals move through the system by supporting the development of a care management entity and care managers at the DC Jail • Provide training, technical assistance, coaching, and consultation to SUD providers/health care professionals to increase their ability to address client needs • Implement a coordinated approach at the community level by facilitating key stakeholders in each ward to work collaboratively around prevention, community outreach, and education initiatives 	01/01/2020 – 03/31/2020	N/A
<input type="checkbox"/> The state has no implementation update to report for this reporting topic.			

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
12. SUD Demonstration Evaluation Update			
12.1. Narrative Information			
<input checked="" type="checkbox"/> Provide updates on SUD evaluation work and timeline. The appropriate content will depend on when this report is due to CMS and the timing for the demonstration. See report template instructions for more details.	The evaluation contract was not awarded in Q1. The District anticipated this would delay the submission of the evaluation design and worked with CMS to update the date of submission.	01/01/2020 – 03/31/2020	N/A
<input type="checkbox"/> The state has no SUD demonstration evaluation update to report for this reporting topic.			
<input checked="" type="checkbox"/> Provide status updates on deliverables related to the demonstration evaluation and indicate whether the expected timelines are being met and/or if there are any real or anticipated barriers in achieving the goals and timeframes agreed to in the STCs.	The evaluation design was originally due May 4, 2020. The COVID-19 public health emergency caused contracting delays and CMS has granted an extension to September 4, 2020 to submit the evaluation design.	01/01/2020 – 03/31/2020	N/A
<input type="checkbox"/> The state has no SUD demonstration evaluation update to report for this reporting topic.			
<input checked="" type="checkbox"/> List anticipated evaluation-related deliverables related to this demonstration and their due dates.	The evaluation design was originally due May 4, 2020. The COVID-19 public health emergency caused contracting delays and CMS has granted an extension to September 4, 2020 to submit the evaluation design.	01/01/2020 – 03/31/2020	N/A
<input type="checkbox"/> The state has no SUD demonstration evaluation update to report for this reporting topic.			
13.1 Other Demonstration Reporting			
13.1.1 General Reporting Requirements			
<input checked="" type="checkbox"/> The state reports changes in its implementation of the demonstration that might necessitate a change to approved STCs, implementation plan, or monitoring protocol	Due to the COVID-19 public health emergency and limitations on the size of public gatherings, the District requested an extension to conduct the post award forum to 60 days after the end of the declared public health emergency.	01/01/2020 – 03/31/2020	N/A
<input type="checkbox"/> The state has no updates on general requirements to report for this reporting topic.			

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
<input checked="" type="checkbox"/> The state anticipates the need to make future changes to the STCs, implementation plan, or monitoring protocol, based on expected or upcoming implementation changes	Due to the COVID-19 public health emergency and the dedication of staff resources elsewhere, the District requests a six-month extension to submit the SPAs for non-IMD services.	01/01/2020 – 03/31/2020	N/A
<input type="checkbox"/> The state has no updates on general requirements to report for this reporting topic.			
Compared to the demonstration design and operational details, the state expects to make the following changes to: <ul style="list-style-type: none"> <input checked="" type="checkbox"/> i) The schedule for completing and submitting monitoring reports <input type="checkbox"/> ii) The content or completeness of submitted reports and/or future reports 	i) Due to the COVID-19 public health emergency, the District requested a due date extension for the Q1 qualitative reporting. On 04/24/2020 CMS granted an extension to 07/30/2020.	i) 01/01/2020 – 03/31/2020	i) N/A
<input type="checkbox"/> The state has no updates on general requirements to report for this reporting topic.			
<input checked="" type="checkbox"/> The state identified real or anticipated issues submitting timely post-approval demonstration deliverables, including a plan for remediation	Due to the COVID-19 public health emergency, the District requested due date extensions for the evaluation design and monitoring protocol. CMS granted extensions and the new due dates for the deliverables are as follows: <ul style="list-style-type: none"> • Monitoring protocol: 07/17/2020 • Evaluation design: 09/04/2020 	01/01/2020 – 03/31/2020	N/A
<input type="checkbox"/> The state has no updates on general requirements to report for this reporting topic.			
13.1.2 Post-Award Public Forum			
<input type="checkbox"/> If applicable within the timing of the demonstration, provide a summary of the annual post-award public forum held pursuant to 42 CFR § 431.420(c) indicating any resulting action items or issues. A summary of the post-award public forum must be included here for the period during which the forum was held and in the annual report.			

Prompt	State response	Measurement period first reported (MM/DD/YYYY - MM/DD/YYYY)	Related metric (if any)
<input checked="" type="checkbox"/> No post-award public forum was held during this reporting period and this is not an annual report, so the state has no post-award public forum update to report for this topic.			
14.1 Notable State Achievements and/or Innovations			
14.1 Narrative Information			
<input type="checkbox"/> Provide any relevant summary of achievements and/or innovations in demonstration enrollment, benefits, operations, and policies pursuant to the hypotheses of the SUD (or if broader demonstration, then SUD related) demonstration or that served to provide better care for individuals, better health for populations, and/or reduce per capita cost. Achievements should focus on significant impacts to beneficiary outcomes. Whenever possible, the summary should describe the achievement or innovation in quantifiable terms, e.g., number of impacted beneficiaries.			
<input checked="" type="checkbox"/> The state has no notable achievements or innovations to report for this reporting topic.			

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

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