State Demonstrations Group

November 17, 2021

Juliet Charron
State Medicaid Director
Division of Medicaid
Idaho Department of Health and Welfare
PO Box 83720
Boise, Idaho 83720

Dear Ms. Charron:

The Centers for Medicare & Medicaid Services (CMS) completed its review of the Substance Use Disorder (SUD) and Serious Mental Illness (SMI) or serious emotional disturbance (SED) Monitoring Protocols, which is required by the Special Terms and Conditions (STCs), specifically STCs #20, of Idaho’s section 1115 demonstration, “Idaho Behavioral Health Transformation” (Project No: 11-W-00339/10), effective through March 31, 2025. CMS determined that the Monitoring Protocols, which were submitted on October 26, 2020 and revised on October 29, 2021, meets the requirements set forth in the STCs, and thereby approves the state’s SUD and SMI/SED Monitoring Protocols.

The Monitoring Protocols are approved for the demonstration period through March 31, 2025 and are hereby incorporated into the demonstration STCs as Attachment E (see attached). In accordance with STC #45 (Public Access), the approved SUD and SMI/SED Monitoring Protocols may now be posted to your state’s Medicaid website.

We look forward to our continued partnership on the Idaho Behavioral Health Transformation demonstration. If you have any questions, please contact your CMS demonstration team.

Sincerely,

Danielle Daly
Director
Division of Demonstration Monitoring and Evaluation

cc: Laura D’Angelo, State Monitoring Lead, CMS Medicaid and CHIP Operations Group
Medicaid Section 1115 Serious Mental Illness and Serious Emotional Disturbance Demonstrations Monitoring Protocol 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 as part of its SMI/SED monitoring protocol. This form should be submitted 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.

<table>
<thead>
<tr>
<th>State</th>
<th>Idaho</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demonstration name</td>
<td>Behavioral Health Transformation</td>
</tr>
<tr>
<td>Approval period for section 1115 demonstration</td>
<td>04/17/2020 – 03/31/2025</td>
</tr>
<tr>
<td>SMI/SED demonstration start date</td>
<td>04/17/2020</td>
</tr>
<tr>
<td>Implementation date of SMI/SED demonstration, if different from SMI/SED demonstration start date</td>
<td></td>
</tr>
<tr>
<td>SMI/SED (or if broader demonstration, then SMI/SED-related) demonstration goals and objectives</td>
<td>This demonstration will provide the state with authority to provide high-quality, clinically appropriate treatment to beneficiaries with serious mental illness (SMI) or serious emotional disturbance (SED) and/or substance use disorder (SUD) while they are short-term residents in residential and inpatient treatment settings that qualify as Institutions for Mental Diseases (IMDs). It will also support state efforts to implement models of care focused on increasing support for individuals in the community and home, outside of institutions, and improve access to a continuum of SMI/SED and/or SUD evidence-based services at varied levels of intensity. This continuum of care shall be based on the American Society of Addiction Medicine (ASAM) criteria and/or other nationally recognized assessment and placement tools that reflect evidence-based clinical treatment guidelines.</td>
</tr>
</tbody>
</table>
2. Acknowledgement of narrative reporting requirements

☒ The state has reviewed the narrative questions in the Monitoring Report Template provided by CMS and understands the expectations for quarterly and annual monitoring reports. The state will provide the requested narrative information (with no modifications).

3. Annual Assessment of the Availability of Mental Health Services reporting

☒ The state will use data as of the following month and day of each calendar year to conduct its Annual Assessment of the Availability of Mental Health Services: April 1

4. Acknowledgement of budget neutrality reporting requirements

☒ The state has reviewed the Budget Neutrality Workbook provided by the CMS demonstration team and understands the expectations for quarterly and annual monitoring reports. The state will provide the requested budget neutrality information (with no modifications).

5. Retrospective reporting

The state is not expected to submit metrics data until after monitoring protocol approval, to ensure that data reflects the monitoring plans agreed upon by CMS and the state. Prior to monitoring protocol approval, the state should submit quarterly and annual monitoring reports with narrative updates on implementation progress and other information that may be applicable, according to the requirements in its STCs.

For a state that has monitoring protocols approved after one or more initial quarterly monitoring report submissions, it should report metrics data to CMS retrospectively for any prior quarters of the section 1115 SMI/SED demonstration that precede the monitoring protocol approval date. A state is expected to submit retrospective metrics data—provided there is adequate time for preparation of these data—in its second monitoring report submission that contains metrics. The retrospective report for a state with a first SMI/SED DY of less than 12 months should include data for any baseline period quarters preceding the demonstration, as described in Part A of the state’s monitoring protocol (see Appendix B of the instructions for further guidance determining baseline periods for first SMI/SED DYs that are less than 12 months). If a state needs additional time for preparation of these data, it should propose an alternative plan (i.e., specify the monitoring report that would capture the data) for reporting retrospectively on its SMI/SED demonstration.

In the monitoring report submission containing retrospective metrics data, the state should also provide a general assessment of metrics trends from the start of its demonstration through the end of the current reporting period. The state should report this information in Part B of its report submission (Section 3. Narrative information on implementation, by milestone and reporting topic). This general assessment is not intended to be a comprehensive description of every trend observed in metrics data. Unlike other monitoring report submissions, for instance, the state is not required to describe all metrics changes (+ or - greater than 2 percent). Rather, the assessment is an opportunity for the state to provide context for its
retrospective metrics data, to support CMS’s review and interpretation of these data. For example, consider a state that submits data showing an increase in the utilization of telehealth services for mental health (Metric #15) over the course of the retrospective reporting period. The state may decide to highlight this trend to CMS in Part B of its monitoring report (under Milestone 3) by briefly summarizing the trend and providing context that during this period, the state implemented a grant to improve access to mental health treatment in rural areas through the use of telemedicine.

For further information on how to compile and submit a retrospective report, the state should review Section B of the Monitoring Report Instructions document.

☒ The state will report retrospectively for any quarters prior to monitoring protocol approval as described above, in the state’s second monitoring report submission that contains metrics after monitoring protocol approval.

☐ The state proposes an alternative plan to report retrospectively for any quarters prior to monitoring protocol approval