

**Medicaid Section 1115 Substance Use Disorder & 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 substance use disorder (SUD) and serious mental illness and serious emotional disturbance (SMI/SED) demonstrations or the SUD and SMI/SED components of the broader demonstration

This section collects information on the approval features of the state’s section 1115 demonstration overall, followed by information for the SUD and SMI/SED components. The state completed this title page as part of its SUD and SMI/SED monitoring protocol(s). The state should complete this table using the corresponding information from its CMS-approved monitoring protocol(s) and submit this as the title page of all monitoring reports. The content of this table should stay consistent over time. Definitions for certain rows are below the table.

| Overall section 1115 demonstration | |
|---|----------------------------|
| State | Indiana |
| Demonstration name | Healthy Indiana Plan (HIP) |
| Approval period for section 1115 demonstration | 01/01/2021 – 12/31/2025 |
| Reporting period | 04/01/2024-06/30/2024 |
| SUD demonstration | |
| SUD component start date ^a | 02/01/2018 |
| Implementation date of SUD component, if different from SUD component start date ^b | N/A |

| | |
|---|--|
| SUD-related demonstration goals and objectives | <p>All Medicaid beneficiaries in Indiana will continue to have access to all current mental health and SUD benefits. In addition, all beneficiaries, ages 21 through 64 will have access to expanded covered services provided while residing in an Institution for Mental Diseases (IMD) for SUD short-term residential stays. The SUD program will allow beneficiaries with SUD to access benefits that include SUD residential treatment, crisis stabilization and withdrawal management services provided in IMDs, which would otherwise be excluded from federal reimbursement.</p> <p>Goals include:</p> <ol style="list-style-type: none">1. Increased rates of identification, initiation, and engagement in treatment;2. Increased adherence to and retention in treatment;3. Reductions in overdose deaths, particularly those due to opioids;4. Reduced utilization of emergency departments and inpatient settings for treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services;5. Fewer readmissions to the same or higher level of care where the readmission is preventable or medically inappropriate; and6. Improved access to care for physical health conditions among beneficiaries. |
| SUD demonstration year and quarter | SUD DY7Q2 |

| SMI/SED demonstration | |
|---|--|
| SMI/SED component demonstration start date ^a | 01/01/2020 |
| Implementation date of SMI/SED component, if different from SMI/SED component start date ^b | N/A |
| SMI/SED-related demonstration goals and objectives | <ol style="list-style-type: none"> 1. Reduced utilization and length of stay in emergency departments (EDs) among Medicaid beneficiaries with SMI/SED while awaiting mental health treatment in specialized settings; 2. Reduced preventable readmissions to acute care hospitals and residential settings; 3. Improved availability of crisis stabilization services, including services made available through call centers and mobile crisis units, intensive outpatient services, as well as services provided during acute short-term stays in residential crisis stabilization programs, psychiatric hospitals, and residential treatment settings throughout the state; 4. Improved access to community-based services to address the chronic mental health care needs of beneficiaries with SMI/SED, including through increased integration of primary and behavioral health care; and 5. Improved care coordination, especially continuity of care in the community following episodes of acute care in hospitals and residential treatment facilities. |
| SMI/SED demonstration year and quarter | DY5Q2 |

^a **SUD and SMI/SED demonstration components start dates:** For monitoring purposes, CMS defines the start date of the demonstration as the *effective date* listed in the state's STCs at time of SUD and SMI/SED demonstration component approvals. For example, if the state's STCs at the time of SUD demonstration approval note that the SUD demonstration is effective January 1, 2020 – December 31, 2025, the state should consider January 1, 2020 to be the start date of the SUD demonstration. Note that the effective date is considered to be the first day the state may begin its SUD or SMI/SED demonstration component. 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 December 15, 2020, with an effective date of January 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 SUD and SMI/SED demonstration components:** The date the state began claiming or will begin claiming federal financial participation for services provided to individuals in institutions for mental disease.

2. Executive summary

The executive summary for the SUD and SMI components of the demonstration should be reported below. It is intended for summary-level information only and may be combined for all policies included in the title page. The recommended word count is 500 words or less.

During Q2 2024, the Division of Mental Health and Addiction is continuing to work with providers to designate mobile crisis providers. These mobile crisis units are affiliated with community mental health centers. In March 2024, Indiana Medicaid established a new specialty and type to allow non-community mental health centers to be enrolled as mobile crisis providers. Currently, Indiana has enrolled 20 mobile crisis units. There are several more waiting for designation from DMHA.

Indiana Medicaid finished working to update the current per diem bundle, in order incorporate other forms of MAT treatment besides methadone (e.g. buprenorphine, naltrexone) and to include mechanisms for take-home MAT dispensing. In addition, Indiana Medicaid has aligned the OTP per diem rates to a weekly bundle that is currently aligned with current Medicare guidance. This SPA received approval from the Indiana State Budget Committee in July 2022, and OMPP submitted these SPA pages to CMS in Q1 of 2023. CMS approved the amendment pages in June 2023, and it had an effective date set for July 2023. The Office of Medicaid Policy and Planning has been collaborating with the Division of Mental Health and Addiction in answering questions and concerns that the opioid treatment providers have brought forward. Throughout this period (April 2024 to June 2024), Indiana Medicaid and the Division of Mental Health and Addiction continued to assist providers with policy and reimbursement inquiries. In addition, the Division of Mental Health and Addiction are currently looking to expand telehealth services that are being utilized by the OTPs and bringing in more behavioral health services to OTPS.

During Q2 2024, OMPP and DMHA were informed by CMS that they were approved for the 1115 Demonstration Waiver for Certified Community Behavioral Health Clinics (CCBHC). Several current community mental health centers (CMHC) expressed their interest in transitioning to the new CCBHC model. OMPP is currently working with a contractor to create a new provider type and specialty for the CCBHC.

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

A. SUD component

| Prompt | | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|--|---|----------------------------|--|
| 1. Assessment of need and qualification for SUD services | | | | |
| 1.1 Metric trends | | | | |
| 1.1.1 | 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. | X | #3, #4 | |
| 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 | | |
| 1.2.1.a | The target population(s) of the demonstration | | | |
| 1.2.1.b | The clinical criteria (e.g., SUD diagnoses) that qualify a beneficiary for the demonstration | X | | DMHA and OMPP have been collaborating on the roll-out of the new ASAM 4.1 criteria. DMHA will be holding sessions with providers and MCEs to discuss the new criteria and the important revisions to notice from ASAM 3.1 to ASAM 4.1. |
| 1.2.2 | The state expects to make other program changes that may affect metrics related to assessment of need and qualification for SUD services. | X | | |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|--|---|--------------------------------|--|
| 2. Access to Critical Levels of Care for OUD and other SUDs (Milestone 1) | | | |
| 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 1. | | #6, #7, #8, #9, #10, #11, #12, | <p>#7: The number of beneficiaries who used early intervention services (such as procedure codes associated with SBIRT) decreased 6.12% compared to Q1. The average decreased from 32.67 to 30.66.</p> <p>#9: The average monthly utilization for Intensive Outpatient and Partial Hospitalization services for SUD increased 11.37% in Q2 compared to last quarter, Q1.</p> <p>#10: The number of beneficiaries who use residential and/or inpatient services for SUD increased 2.40% in Q2.</p> <p>#11: The number of beneficiaries who use withdrawal management services (such as outpatient, inpatient, or residential) increased 2.61% in Q2.</p> <p>#12: The number of beneficiaries who have a claim for MAT for SUD decreased 3.27% in Q2.</p> |
| 2.2 Implementation update | | | |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|--|---|----------------------------|---|
| <p>2.2.1 Compared to the demonstration design and operational details, the state expects to make the following changes to:</p> <p>2.2.1.a 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)</p> | | | <p>During the period of April 2024 and June 2024, Indiana Medicaid and the Division of Mental Health and Addiction continued to collaborate in answering policy and reimbursement questions around using G reimbursement codes for medication-assisted treatment. In addition, both divisions continue to collaborate with each other in the implementation of the certified community behavioral health centers. DMHA has hosted numerous quarterly summits with managed care entities and providers. DMHA and OMPP are looking into expanding behavioral health services at OTP facilities.</p> |
| <p>2.2.1.b 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 individual IMDs</p> | X | | |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|---|----------------------------|--|
| 2.2.2 The state expects to make other program changes that may affect metrics related to Milestone 1. | | | The Division of Mental Health and Addiction is currently designating different organizations to render mobile crisis services. Mobile crisis unit response coverage has been effective since July 2023. The Office of Medicaid Policy and Planning received approval for the Mobile Crisis State Plan Amendment in September 2023. Indiana Medicaid has since provided clarification on the specific codes and process to become a designated mobile crisis unit. From April 2024 to June 2024, DMHA has designated several new mobile crisis providers. Initially, Indiana allowed CMHCs to provide mobile crisis services. In April, Indiana expanded mobile crisis services by allowing non-CMHCs to be designated as a mobile crisis service provider. |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|--|---|----------------------------|--|
| 3. Use of Evidence-based, SUD-specific Patient Placement Criteria (Milestone 2) | | | |
| 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 2. | X | #5, #36 | |
| 3.2 Implementation update | | | |
| 3.2.1 Compared to the demonstration design and operational details, the state expects to make the following changes to: 3.2.1.a Planned activities to improve providers' use of evidence-based, SUD-specific placement criteria | | | DMHA has investigated how the new revision of the ASAM criteria (ASAM 4.1) will impact provider expectations and quality control. In June 2024, DMHA held informational sessions on the new ASAM criteria. |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|---|----------------------------|---|
| <p>3.2.1.b 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</p> | | | <p>During Q2 of 2024, the Division of Mental Health and Addiction continued discussions relating to 3.7 ASAM level designations for our SUD residential providers.</p> <p>OMPP and DMHA collaborated with Next Level Recovery to launch ATLAS (Addiction Treatment Locator, Assessment, and Standards platform) as the state's addiction treatment locator. This effort will help individuals seeking addiction treatment find high quality care. ATLAS successfully launched in the state in September 2023. Between April-Jun ,6727 users utilized Atlas with 5909 being unique individuals. The top four substance filters are Alcohol, Methamphetamine, Cocaine and Heroin/Fentanyl. The treatment Atlas assessment has been completed by 1796 individuals and 415 individuals saved the results. As part of Atlas, there is an ability to directly link to 988 and 911 with 5 users utilizing 911 and 2 utilizing 988.</p> |
| <p>3.2.2 The state expects to make other program changes that may affect metrics related to Milestone 2.</p> | X | | |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|--|---|----------------------------|---|
| 4. Use of Nationally Recognized SUD-specific Program Standards to Set Provider Qualifications for Residential Treatment Facilities (Milestone 3) | | | |
| 4.1 Metric trends | | | |
| <p>4.1.1 The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 3.</p> <p>Note: There are no CMS-provided metrics related to Milestone 3. If the state did not identify any metrics for reporting this milestone, the state should indicate it has no update to report.</p> | X | | |
| 4.2 Implementation update | | | |
| <p>4.2.1 Compared to the demonstration design and operational details, the state expects to make the following changes to:</p> <p>4.2.1.a Implementation of residential treatment provider qualifications that meet the ASAM Criteria or other nationally recognized, SUD-specific program standards</p> | | | <p>There are no design changes as of Q2 2024.</p> <p>As reported previously, DMHA began providing ASAM designations for the State’s residential providers on March 1, 2018. By the end of this reporting period (June 2024), for ASAM level 3.1 there was a total of 14 providers with 244 beds. For ASAM level 3.5, there was a total of 67 providers with 2933 beds. For combined ASAM 3.1 and 3.5 facilities, there were 4 providers and 155 beds for this reporting period. Not all these settings qualify as residential IMDs, however. To qualify as an IMD, the setting must meet the bed count requirement and be enrolled as an 836 (SUD residential addiction treatment facility) provider with Indiana Medicaid.</p> |
| <p>4.2.1.b Review process for residential treatment providers’ compliance with qualifications.</p> | X | | |

| Prompt | | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---------|--|---|----------------------------|----------------|
| 4.2.1.c | Availability of medication-assisted treatment at residential treatment facilities, either on-site or through facilitated access to services off site | X | | |
| 4.2.2 | The state expects to make other program changes that may affect metrics related to Milestone 3. | X | | |

| Prompt | | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|--|---|----------------------------|----------------|
| 5. Sufficient Provider Capacity at Critical Levels of Care including for Medication Assisted Treatment for OUD (Milestone 4) | | | | |
| 5.1 Metric trends | | | | |
| 5.1.1 | The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 4. | X | #13, #14 | |
| 5.2 Implementation update | | | | |
| 5.2.1 | Compared to the demonstration design and operational details, the state expects to make the following changes to: Planned activities to assess the availability of providers enrolled in Medicaid and accepting new patients across the continuum of SUD care. | X | | |
| 5.2.2 | The state expects to make other program changes that may affect metrics related to Milestone 4. | X | | |

| Prompt | | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|--|---|----------------------------|----------------|
| 6. Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and OUD (Milestone 5) | | | | |
| 6.1 Metric trends | | | | |
| 6.1.1 | The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 5. | X | #23 #27 | |
| 6.2 Implementation update | | | | |
| 6.2.1 | Compared to the demonstration design and operational details, the state expects to make the following changes to: | X | | |
| 6.2.1.a | Implementation of opioid prescribing guidelines and other interventions related to prevention of OUD | | | |
| 6.2.1.b | Expansion of coverage for and access to naloxone | X | | |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|---|----------------------------|---|
| 6.2.2 The state expects to make other program changes that may affect metrics related to Milestone 5. | | | Indiana has submitted and received approval from CMS for a state plan amendment to CMS to restructure how opioid treatment programs are currently reimbursed by Indiana Medicaid. Indiana Medicaid has completed its transition of the per diem code to the weekly G-code bundle, to incorporate other forms of MAT treatment besides methadone (e.g. buprenorphine, naltrexone) and to include mechanisms for take-home MAT dispensing. This SPA received approval from the Indiana State Budget Committee in July 2022, and OMPP submitted these SPA pages to CMS in Q1 of 2023. CMS approved the state amendment pages in June 2023, and these changes became effective in July 2023. Indiana Medicaid further aligned with Medicare by implementing the OTP G-codes that would allow for more services on a weekly basis including the ability to allow take-home supplies. From April 2024 to June 2024, DMHA and Indiana Medicaid have continued to collaborate with providers, managed care entities, and outside stakeholders to provide informational sessions and bulletins on the updates to various OTP services. |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|--------|---|----------------------------|----------------|
| 7. | Improved Care Coordination and Transitions between Levels of Care (Milestone 6) | | |
| 7.1 | Metric trends | | |

| | | | |
|---|--|----------------------|---|
| <p>7.1.1 The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 6.</p> | | <p>#15, #17, #25</p> | <p>#15: Initiation and Engagement of Alcohol and Other Drug Dependence Treatment</p> <p>Initiation of AOD Treatment - Alcohol abuse or dependence: increased by 9.73%.</p> <p>Initiation of AOD Treatment - Opioid abuse or dependence: increased by 19.50%.</p> <p>Initiation of AOD Treatment - Other drug abuse or dependence: increased by 16.14%.</p> <p>Initiation of AOD Treatment - Total AOD abuse of dependence: increased by 13.87%.</p> <p>Engagement of AOD Treatment - Alcohol abuse or dependence: increased by 23.50%.</p> <p>Engagement of AOD Treatment - Opioid abuse or dependence: increased by 87.55%.</p> <p>Engagement of AOD Treatment - Other drug abuse or dependence: increased by 51.10%.</p> <p>Engagement of AOD Treatment - Total AOD abuse of dependence: increased by 45.53%.</p> <p>#17(1): For the 30-day rate, there was an 11.07% increase in CY 2023 compared to CY 2022. For the 7-day rate, there was 10.32% increase in CY 2023 compared to CY2022.</p> |
|---|--|----------------------|---|

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|---|----------------------------|---|
| | | | #17(2): For the 30-day rate, there was a 4.61% increase in CY 2023 compared to CY 2022. For the 7-day rate, there was a 3.22% increase in CY 2023 compared to CY 2022. |
| 7.2 Implementation update | | | |
| 7.2.1 Compared to the demonstration design and operational details, the state expects to make the following changes to: Implementation of policies supporting beneficiaries' transition from residential and inpatient facilities to community-based services and supports. | | | <p>The State utilizes a SUD Work Group to identify and address improvement opportunities in the SUD delivery system and continue the State's efforts to engage and support SUD stakeholders representing all areas of the SUD continuum of care. During the SUD DY7Q2 reporting period, key activities include:</p> <ol style="list-style-type: none"> 1. April 2024 to June 2024: <ol style="list-style-type: none"> a. <i>ASAM 4.1:</i> DMHA and OMPP discussed the revisions that were made to the ASAM criteria. DMHA discussed that they are planning on holding provider meetings to discuss the changes that were made in update to the ASAM criteria. b. <i>Urine Drug Screening and Laboratory Services:</i> DMHA and OMPP discuss updating the clinical and reimbursement guidelines for drug screenings that have occurred within in a SUD Residential setting. c. <i>SUD Residential Reimbursement Rate:</i> Discussions around the current reimbursement rate and what is included in the reimbursement bundles. |
| 7.2.2 The state expects to make other program changes that may affect metrics related to Milestone 6. | X | | |

| Prompt | | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|---|---|----------------------------|---|
| 8. SUD health information technology (health IT) | | | | |
| 8.1 Metric trends | | | | |
| 8.1.1 | The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to its SUD health IT metrics. | | S.1, S.2, S.3 | S2 (Q2): The number of patient requests made into INSPECT on a statewide basis increased 2.49% in Q2 2024 compared to Q1 2024. |
| 8.2 Implementation update | | | | |
| 8.2.1 | Compared to the demonstration design and operational details, the state expects to make the following changes to: | X | | |
| 8.2.1.a | How health IT is being used to slow down the rate of growth of individuals identified with SUD | | | |
| 8.2.1.b | How health IT is being used to treat effectively individuals identified with SUD | X | | |
| 8.2.1.c | How health IT is being used to effectively monitor “recovery” supports and services for individuals identified with SUD | X | | |
| 8.2.1.d | 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 | X | | |
| 8.2.1.e | Other aspects of the state’s health IT implementation milestones | X | | |
| 8.2.1.f | The timeline for achieving health IT implementation milestones | X | | |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|--|---|----------------------------|--|
| 8.2.1.g Planned activities to increase use and functionality of the state’s prescription drug monitoring program | X | | |
| 8.2.2 The state expects to make other program changes that may affect SUD metrics related to health IT. | X | | |
| 9. Other SUD-related metrics | | | |
| 9.1 Metric trends | | | |
| 9.1.1 The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to other SUD-related metrics. | | #24 | The average monthly count of inpatient stays for SUD per 1,000 beneficiaries decreased 48.42% in Q2 compared to Q1. Metric #24’s quarterly average decreased from 3.64 (2024 Q1) to 1.87 (2024 Q2). |
| 9.2 Implementation update | | | |
| 9.2.1 The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to other SUD-related metrics. | | #33, #34 | <p>#33. In Q2, only three grievances were filed related to SUD treatment services. This is a 40% decrease compared to the five filed in Q1. The decrease appears significant due to small numbers.</p> <p>#34. The number of appeals filed related to SUD treatment services decreased 27.87%. In 2024 Q2, 132 appeals were filed versus the 183 appeals filed in 2024 Q1.</p> |

B. SMI/SED component

| 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 Metric trends | | | | |
| 1.1.1 | The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 1. | | #2 | #2: The percentage of children and adolescents ages 1 to 17 who had a new prescription for an antipsychotic medication and had documentation of psychosocial care as first-line treatment decreased 3.72% in CY2023. |
| 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 | | |
| 1.2.1.a | The licensure or accreditation processes for participating hospitals and residential settings | | | |
| 1.2.1.b | The oversight process (including unannounced visits) to ensure participating hospital and residential settings meet state's licensing or certification and accreditation requirements | X | | |
| 1.2.1.c | 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 | | |
| 1.2.1.d | The program integrity requirements and compliance assurance process | X | | |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|---|----------------------------|----------------|
| 1.2.1.e 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 | | |
| 1.2.1.f 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. | X | | |

| 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 | | | |
| <p>2.1.1 The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 2.</p> | | <p>#3, #4, #6, #7, #8, #9, #10</p> | <p>#4: For Q2 reporting, Indiana referenced the technical specifications and found that the guidance requests that Indiana use the discharge date to identify inpatient stays. Previously, Indiana was using end date of service to identify the claims. To align with the technical specifications, the logic for this metric was modified. For an accurate comparison, the rate for CY 2022 was reran using the new logic. The denominator for CY 2022 was 4934 and the numerator was 2218. The CY 2022 rate is 0.4495. As a result, in CY 2023, the metric increased 6.48%.</p> <p>#7: For the 7-day rate decreased 1.02 % in CY 2023. The 30-day rate decreased 9.60% in CY2023.</p> <p>#8: For the 30-day rate, there was a 9.37% decrease in CY 2023. For the 7-day rate, there was a 16.79% decrease in CY 2023.</p> <p>#9: For the 30-day rate, there was a 17.93% decrease in CY 2023. For the 7-day rate, there was a 21.78% decrease in CY 2023.</p> <p>#10: For the 30-day rate, there was a 9.42% decrease in CY2023. For the 7-day rate, there was a 15.58% decrease in CY2023.</p> |
| 2.2 Implementation update | | | |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|---|----------------------------|----------------|
| <p>2.2.1 Compared to the demonstration design and operational details, the state expects to make the following changes to:</p> <p>2.2.1.a Actions to ensure that psychiatric hospitals and residential treatment settings carry out intensive pre-discharge planning, and include community-based providers in care transitions</p> | X | | |
| <p>2.2.1.b Actions to ensure psychiatric hospitals and residential settings assess beneficiaries' housing situations and coordinate with housing services providers</p> | X | | |
| <p>2.2.1.c State requirement to ensure psychiatric hospitals and residential settings contact beneficiaries and community-based providers within 72 hours post discharge</p> | X | | |
| <p>2.2.1.d 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)</p> | X | | |
| <p>2.2.1.e Other state requirements/policies to improve care coordination and connections to community-based care)</p> | X | | |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|---|----------------------------|----------------|
| 2.2.2 The state expects to make other program changes that may affect metrics related to Milestone 2. | X | | |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|--|---|------------------------------|--|
| 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. | | #13, #14, #15, #16, #17, #18 | <p>#13: The number of beneficiaries who used inpatient services related to mental health decreased 2.86 % in Q2 2024 compared to Q1.</p> <p>#14: The number of beneficiaries in the demonstration population who used intensive outpatient and/or partial hospitalization services related to mental health increased 7.63% in Q2 2024 compared to Q1.</p> <p>#15: The number of beneficiaries in the demonstration population who used outpatient services related to mental health during the measurement period increased 6.75% in Q2 2024 compared to Q1.</p> <p>#16: The number of beneficiaries who use ED services for mental health decreased by 2.15% in Q2 2024 compared to Q1.</p> <p>#17: The number of beneficiaries who used telehealth services for mental health increased by 7.80% in Q2 2024 compared to Q1.</p> <p>#18: The number of beneficiaries in the demonstration population who used any services related to mental health during the measurement period increased 5.97% in Q2 2024 compared to Q1.</p> |
| 3.2 Implementation update | | | |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|---|----------------------------|--|
| <p>3.2.1 Compared to the demonstration design and operational details, the state expects to make the following changes to:</p> <p>3.2.1.a State requirement that providers use an evidenced-based, publicly available patient assessment tool to determine appropriate level of care and length of stay</p> | X | | |
| <p>3.2.1.b Other state requirements/policies to improve access to a full continuum of care including crisis stabilization</p> | X | | |
| <p>3.2.2 The state expects to make other program changes that may affect metrics related to Milestone 3.</p> | | | <p>Indiana’s Division of Mental Health and Addiction (DMHA) is working to establish updates to intake assessments, particularly by replacing/updating CANS/ANSA criteria that are required for certain packages under Indiana Health Coverage Programs (e.g. the Medicaid Rehabilitation Option). These discussions are ongoing, and no decision has been made yet on how to proceed with the project. During this quarter, these discussions have been occurring on an ongoing basis. With the current pursuit of the certified community behavioral health center demonstration, DMHA is looking how MRO, and its assessments would be implemented into this project. This discussion is ongoing, and OMPP has been involved in these conversations.</p> |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|---|-------------------------------------|---|
| 4. Earlier Identification and Engagement in Treatment, Including Through Increased Integration (Milestone 4) | | | |
| 4.1 Metric trends | | | |
| <p>4.1.1 The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 4.</p> | | <p>#21, #22, #23, #26, #29, #30</p> | <p><u>#21</u>: The number of beneficiaries with SMI/SED increased by 4.82% in Q2 2024 to compared to Q1.</p> <p><u>#23</u>: Diabetes care for patients with serious mental illness decreased 17.65% in CY2023.</p> <p><u>#26</u>: The percentage of Medicaid beneficiaries aged 18 years or older with SMI who had an ambulatory or preventive care visit during the measurement period decreased 0.12% in CY2023.</p> <p><u>#29</u>: The percentage of children and adolescents on antipsychotics who received blood glucose testing increased by 4.83% in CY2023.</p> <p>The percentage of children and adolescents on antipsychotics who received cholesterol testing increased by 10.13% in CY2023.</p> <p>The Percentage of children and adolescents on antipsychotics who received blood glucose and cholesterol testing increased by 11.16% in CY2023.</p> <p><u>#30</u>: The number of beneficiaries receiving follow-up care for adult Medicaid beneficiaries who are newly prescribed an antipsychotic medication increased by 0.84% in CY2023.</p> |
| 4.2 Implementation update | | | |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|---|----------------------------|--|
| <p>4.2.1 Compared to the demonstration design and operational details, the state expects to make the following changes to:</p> <p>4.2.1.a Strategies for identifying and engaging beneficiaries in treatment sooner (e.g., with supported education and employment)</p> | X | | |
| <p>4.2.1.b Plan for increasing integration of behavioral health care in non-specialty settings to improve early identification of SED/SMI and linkages to treatment</p> | X | | |
| <p>4.2.1.c Establishment of specialized settings and services, including crisis stabilization services, focused on the needs of young people experiencing SMI or SED</p> | | | <p>OMPP and DMHA are currently designating mobile crisis providers across the state. As for June 2024, there are 20 mobile crisis providers. More providers have submitted their applications to be designated by DMHA to render these services. DMHA has started a Crisis Stabilization Services pilot program.</p> |
| <p>4.2.1.d Other state strategies to increase earlier identification/engagement, integration, and specialized programs for young people</p> | | | <p>OMPP submitted a state plan amendment to expand school-based services by allowing school psychologists to provide testing services. This SPA was approved in 2023. OMPP is currently having discussions with the Department of Education on defining the scope of practice for an independent practice school psychologist.</p> |
| <p>4.2.2 The state expects to make other program changes that may affect metrics related to Milestone 4.</p> | X | | |

| Prompt | | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|---|---|----------------------------|---|
| 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 SMI/SED health IT metrics. | | Q1, Q1, Q3 | <p>Q1: The number of Indiana DOC facilities connected to HIE is unchanged from last quarter.</p> <p>Q2: The count of Behavioral Health providers enrolled in Medicaid increased 9.98%.</p> <p>Q3: The percentage of CMHCs accessing client outcome reports increased 133.33% in Q2 2024 from three in Q1 to seven in Q2.</p> |
| 5.2 Implementation update | | | | |
| 5.2.1 | Compared to the demonstration design and operational details, the state expects to make the following changes to: | X | | |
| 5.2.1.a | The three statements of assurance made in the state's health IT plan | | | |
| 5.2.1.b | 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 | | |
| 5.2.1.c | Electronic care plans and medical records | X | | |
| 5.2.1.d | Individual consent being electronically captured and made accessible to patients and all members of the care team | X | | |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|---|----------------------------|----------------|
| 5.2.1.e 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 | | |
| 5.2.1.f Telehealth technologies supporting collaborative care by facilitating broader availability of integrated mental health care and primary care | X | | |
| 5.2.1.g Alerting/analytics | X | | |
| 5.2.1.h Identity management | X | | |
| 5.2.2 The state expects to make other program changes that may affect SMI/SED metrics related to health IT. | X | | |

| Prompt | | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|--|--|---|----------------------------|--|
| 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 2 percent related to other SMI/SED-related metrics. | | #36, #37, #38 | <p>#36: There was a -33.33% decrease in the number of SMI grievances in Q2 2024 (n=2) compared to Q1 2024 (n=3). The decrease appears significant due to the small numbers.</p> <p>#37: There was a 17.43% increase in the number of SMI appeals filed in Q2 2024 (n=128) compared to Q1 2024 (n=109).</p> <p>#38: There was a -25.19% decrease in critical incidents in Q2 2024 (n=606) compared to Q1 2024 (n=810).</p> |
| 6.2 Implementation update | | | | |
| 6.2.1 | The state expects to make the following program changes that may affect other SMI/SED-related metrics. | X | | |
| 7. Annual Assessment of 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 of Medicaid beneficiaries with SMI/SED compared to those described in the Initial Assessment of the Availability of Mental Health Services (for example, prevalence and distribution of SMI/SED). Recommended word count is 500 words or less. | X | | |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|---|----------------------------|--|
| 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. | | | In July 2023, the mobile crisis units became effective. In September 2023, CMS approved the SPA for the mobile crisis units. Also, there is current cross-collaboration between the Division of Mental Health and Addiction and OMPP to designate these mobile crisis units. As of June 2024, there are 20 mobile crisis providers through various community mental health providers with more providers submitting applications to DMHA. As of March 2024, 13 of the 20 community mental health centers have received their designation, but the remainder are still offering services to Medicaid beneficiaries. In addition, DMHA and OMPP are collaborating on the upcoming implementation of the certified community behavioral health centers. |
| 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 | | |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | 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: 7.2.1.a 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 | | Throughout the assessments, that state has continued to improve data collection. As a result, the data sources for a few settings have changed between the assessments. Given that the Division of Mental Health and Addiction is the licensing authority for multiple settings in the assessment, OMPP has continued to update processes as needed to collaborate with DMHA more closely. |
| 7.2.1.b Strategies to improve state tracking of availability of inpatient and crisis stabilization beds | X | | |

| Prompt | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|---|---|----------------------------|----------------|
| 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. | X | | |
| 8.2 Narrative information | | | |
| 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. | X | | |

| Prompt | | State has no trends/update to report (place an X) | Related metric(s) (if any) | State response |
|----------------------------------|---|---|----------------------------|--|
| 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: | | | OMPP established a provider type/specialty for mobile crisis units to able them to receive direct reimbursement by Indiana Medicaid. Mobile crisis services have been effective in Indiana since July 2023. CMS approved the Mobile Crisis Unit State Plan Amendment in September 2023. DMHA is continuing the process of designating mobile crisis unit providers. OMPP has established a provider specialty and type that allows non-CMHCs to render mobile crisis units. |
| 9.1.1.a | 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 | | | |
| 9.1.1.b | 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 | | | Currently, Indiana uses the community mental health center (CMHC) to deliver accessible behavioral health care to the residents of Indiana. DMHA has started the planning stages of implementing the designation process of certified community behavioral health center (CCBHC). In Q4 2023, DMHA and OMPP worked collaboratively on the financial/reimbursement aspects of the CCBHC project. Furthermore, the certification standards for the CCBHCs are in the final stages. In March 2024, DMHA successfully applied for the CMS 1115 Demonstration for CCBHC. In June 2024, CMS awarded Indiana the 1115 Demonstration Waiver for CCBHC. |

4. Narrative information on other reporting topics applicable to both SUD and SMI/SED components

| Prompts | State has no 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 SUD and SMI/SED components are part of a broader demonstration, the state should provide an analysis of the SUD- and SMI/SED-related budget neutrality and an analysis of budget neutrality as a whole. | | <p>The budget neutrality for Q2 2024 has been updated to include actual experience for January 1, 2021, through June 30, 2024. The “Total Adjustments” tab reflects adjustments made to Schedule C expenditures that weren’t previously reported from January 2021-June 2024. This adjustment is necessary as Schedule C reporting has a lag of six months. Enrollment for SUD and the two SMI MEGs is assumed to grow at 5% for DY 11. The state anticipates that institutions of mental disease (IMD) and residential treatment utilization may continue to grow as the program continues to serve members with SMI and additional providers are identified.</p> <p>To address additional information requested by CMS, OMPP’s actuaries are submitting figures to the actual enrollment and projected enrollment sections of the report. Recipients are those that receive IMD or residential SUD treatment and not those with SUD/SMI diagnosis receiving outpatient services</p> |
| 10.2 Implementation update | | |
| 10.2.1 The state expects to make other program changes that may affect budget neutrality. | X | |

| Prompts | State has no update to report (place an X) | State response |
|--|--|---|
| 11. SUD- and SMI/SED-related demonstration operations and policy | | |
| 11.1 Considerations | | |
| 11.1.1 The state should highlight significant SUD and SMI/SED (or if broader demonstration, then SUD- and SMI/SED-related) demonstration components' 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 and SMI/SED demonstration components approved goals or objectives, if not already reported elsewhere in this document. See Monitoring Report Instructions for more detail. | X | Indiana Medicaid has finalized a telehealth code set that was effective July 2022. This code set includes expanded services available via telehealth service delivery, such as expanded behavioral health treatment, and substance use disorder treatment services (e.g., counseling, psychotherapy, MAT adherence/management services, intensive outpatient therapy, etc.). In addition, Indiana Medicaid will also continue to cover audio-only telehealth options in the delivery of behavioral health treatment. In coordination with the Indiana Division of Mental and Health Addiction, the Office of Medicaid Policy and Planning has allowed coverage for skills training and development through telehealth certain criteria have been met. The updated code set for telehealth services will remain in place in 2022 and 2023. At the end of 2023, Indiana Medicaid will reevaluate these codes. Currently, there are discussions being held among OMPP and FSSA leadership to discuss the re-evaluation of the telehealth codes. Indiana Medicaid has utilized a collaboration with local research universities to determine the feasibility of allowing intensive outpatient treatments to be rendered through the telehealth modality. Throughout this quarter (April to June 2024), these conversations continued to take place. |
| 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 SUD, OUD and/or SMI/SED. | X | |

| Prompts | State has no update to report (place an X) | State response |
|--|--|----------------|
| 11.2.3 The initiatives described above are related to the SUD and/or SMI/SED demonstration components. (The state should note similarities and differences from the SUD and SMI/SED demonstration components). | X | |
| 11.2.4 Compared to the demonstration design and operational details, the state expects to make the following changes to: 11.2.4.a How the delivery system operates under the demonstration (e.g., through the managed care system or fee for service) | X | |
| 11.2.4.b Delivery models affecting demonstration participants (e.g., Accountable Care Organizations, Patient Centered Medical Homes) | X | |
| 11.2.4.c Partners involved in service delivery | X | |
| 11.2.4.d SMI/SED-specific: The state Medicaid agency's Memorandum of Understanding (MOU) or other agreement with its mental health services agency | X | |

| Prompts | State has no update to report (place an X) | State response |
|---|--|---|
| 12. SUD and SMI/SED demonstration evaluation update | | |
| 12.1 Narrative information | | |
| 12.1.1 Provide updates on SUD and SMI/SED evaluation work and timeline. The appropriate content will depend on when this monitoring report is due to CMS and the timing for the demonstration. There are specific requirements per 42 Code of Federal Regulations (CFR) § 431.428a(10) for annual reports. See Monitoring Report Instructions for more details. | | Throughout Q2, the SMI and SUD independent evaluators continued their evaluation of the 2021-2023 measurement period. In late 2024, the state will post the evaluations for public comment to begin the SUD/SMI waiver renewal process. There are no barriers or issues with the timeline currently. Both evaluations will be submitted to CMS no later than December 31, 2024. |
| 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. | X | |
| 12.1.3 List anticipated evaluation-related deliverables related to this demonstration and their due dates. | X | |

| Prompts | State has no 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 Compared to the demonstration design and operational details, the state expects to make the following changes to: 13.1.3.a The schedule for completing and submitting monitoring reports | X | |
| 13.1.3.b The content or completeness of submitted monitoring reports and/or future monitoring reports | X | Indiana found that the state's data to address the original Q3 health IT metric in the currently approved protocol was poor in quality. Due to this, in agreement with CMS, Indiana re-worked the Q3 metric and will replace the Q3 metric in the monitoring reports with a new metric moving forward. Reporting on the new Q3 metric began in Q2 2023. |
| 13.1.4 The state identified current or anticipated issues submitting timely post-approval demonstration deliverables, including a plan for remediation. | X | |
| 13.1.5 Provide updates on the results of beneficiary satisfaction surveys, if conducted during the reporting year, including updates on grievances and appeals from beneficiaries, per 42 CFR § 431.428(a)5. | X | |

| Prompts | State has no update to report (place an X) | State response |
|---|--|----------------|
| 13.2 Post-award public forum | | |
| 13.2.2 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 | |

| Prompts | State has no 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 SUD and SMI/SED (or if broader demonstration, then SUD- or SMI/SED-related) demonstration components 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 states must prominently display the following notice on any display of Measure rates:

SUD measures IET-AD, FUA-AD, FUM-AD, and AAP [Metrics #15, 17(1), 17(2), and 32] and SMI/SED measures 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.

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