

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard, Mail Stop S2-25-26  
Baltimore, Maryland 21244-1850



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## State Demonstrations Group

September 9, 2020

Allison Taylor  
Medicaid Director  
Indiana Family and Social Services Administration  
402W. Washington Street, Room W461, MS25  
Indianapolis, IN 46204

Dear Ms. Taylor:

Thank you to you and your staff for your work on the monitoring protocol for the substance use disorder (SUD) component of Indiana's section 1115(a) Medicaid demonstration entitled, "Healthy Indiana Plan (HIP)," (Project No. 11-W-00296/5). The SUD monitoring protocol submitted to the Centers for Medicare & Medicaid Services (CMS) on September 8, 2020 has been found to fulfill the requirements set forth in the Special Terms and Conditions (STC), specifically Section X STC 4, and the State Medicaid Director Letter (SMD #17-003), "Strategies to Address the Opioid Epidemic."

The monitoring protocol is approved for the demonstration period through December 31, 2020 and is hereby incorporated into the demonstration STCs as Attachment E (see attached). In accordance with STC XVI.9 (Public Access), the approved SUD monitoring protocol may now be posted to your state's Medicaid website.

If you have any questions, please contact your CMS project officer, Ms. Rachel Nichols. Ms. Nichols is available to answer any questions concerning your section 1115 demonstration and may be reached by email at [Rachel.Nichols@cms.hhs.gov](mailto:Rachel.Nichols@cms.hhs.gov).

We look forward to our continued partnership on Indiana's Healthy Indiana Plan section 1115 Medicaid demonstration.

Sincerely,

A solid black rectangular box redacting the signature of Andrea J. Casart.

Andrea J. Casart  
Director  
Division of Eligibility and Coverage Demonstrations

cc: Mai Le-Yuen, State Monitoring Lead, CMS Medicaid and CHIP Operations Group

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

<b>State</b>	Indiana
<b>Demonstration name</b>	Healthy Indiana Plan
<b>Approval date for demonstration</b>	02/01/2018
<b>Approval period for SUD</b>	02/01/2018 – 12/31/2020
<b>Approval date for SUD, if different from above</b>	
<b>Implementation date of SUD, if different from above</b>	
<b>SUD (or if broader demonstration, then SUD - related) demonstration goals and objectives</b>	<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"> <li>1. Increased rates of identification, initiation, and engagement in treatment;</li> <li>2. Increased adherence to and retention in treatment;</li> <li>3. Reductions in overdose deaths, particularly those due to opioids;</li> <li>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;</li> <li>5. Fewer readmissions to the same or higher level of care where the readmission is preventable or medically inappropriate; and</li> <li>6. Improved access to care for physical health conditions among beneficiaries</li> </ol>

## 2. Proposed Modifications to SUD Narrative Information on Implementation, by Milestone or Reporting Topic

Summary of proposed modification	Related metric (if any)	Justification for modification
<b>1. Assessment of Need and Qualification for SUD Services</b>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
<b>2. Access to Critical Levels of Care for OUD and other SUDs (Milestone 1)</b>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
<b>3. Use of Evidence-based, SUD-specific Patient Placement Criteria (Milestone 2)</b>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
<b>4. Use of Nationally Recognized SUD-specific Program Standards to Set Provider Qualifications for Residential Treatment Facilities (Milestone 3)</b>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
<b>5. Sufficient Provider Capacity at Critical Levels of Care including for Medication Assisted Treatment for OUD (Milestone 4)</b>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		

Summary of proposed modification	Related metric (if any)	Justification for modification
<b>6. Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and OUD (Milestone 5)</b>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
<b>7. Improved Care Coordination and Transitions between Levels of Care (Milestone 6)</b>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
<b>8. SUD Health Information Technology (Health IT)</b>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
<b>9. Other SUD-related Metrics</b>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
<b>10. Budget Neutrality</b>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
<b>11. SUD-Related Demonstration Operations and Policy</b>		

Summary of proposed modification	Related metric (if any)	Justification for modification
		<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.
		<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).
<b>12. SUD Demonstration Evaluation Update</b>		
		<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.
		<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).
<b>13. Other Demonstration Reporting</b>		
		<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.
		<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).
<b>14. Notable State Achievements and/or Innovations</b>		
		<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.
		<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).

### **3. Acknowledgement of Budget Neutrality Reporting-**

The state has reviewed the Budget Neutrality workbook provided by the project officer and understands the expectations for quarterly and annual monitoring reports. The state will provide the requested budget neutrality information (no modifications).

### **4. Retrospective reporting**

If a state's monitoring protocol is approved after its first quarterly monitoring report submission date, the state should report data to CMS retrospectively for any prior quarters of SUD demonstration implementation. States are expected to submit retrospective metrics data in the state's second monitoring report submission after monitoring protocol approval, or propose an alternative plan for reporting retrospectively on its SUD 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 the state's demonstration through the end of the current reporting period. The state should report this information in Part B of its report submission (Table 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 (for example, unlike other monitoring report submissions, the state is not required to describe all metrics changes (+ or - greater than 2 percent). Rather, the assessment is an opportunity for states to provide context for its retrospective metrics data, to support CMS's review and interpretation. For example, consider a state that submits data showing an increase in the number of medication assisted treatment (MAT) providers (Metric #14) over the course of the retrospective reporting period. The state may decide to highlight this trend to CMS in Part B of its report (under Milestone 4) by briefly summarizing the trend and providing context that during this period, the state implemented a grant that supported training for new MAT providers throughout the state.

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

The state proposes an alternative plan to report retrospectively for any quarters prior to monitoring protocol approval: The state will incorporate CMS feedback dated February 27, 2020 beginning in the DY2 Q4 report. Reporting prior to DY2 Q4 will also be updated but provided as part of the Summative Evaluation submission in the CMS provided templates.

### **5. Reporting SUD Demonstration Metrics and Narrative Information**

The state should review the guidance in Appendix A of the instructions document in order to attest it will follow CMS's guidance on reporting metrics and narrative information, or propose any deviations. The state should complete Table A below to reflect its proposed reporting schedule for the duration of its SUD demonstration approval period.

The state has completed the table below according to the guidance in Appendix A of the instructions document and attests to reporting metrics and narrative information in its quarterly and annual reports according as described.

The state has reviewed Appendix A of the instructions document and completed the table below with the following deviations: Delayed dates of submission of DY2 Q4 report and DY3 Q1 report to accommodate approval of the protocol and incorporation of new CMS specifications included in the last

round of feedback on the protocol. Reporting prior to DY2 Q4 will also be updated but provided as part of the Summative Evaluation submission in the CMS provided templates.

**Table A. IN reporting in quarterly and annual monitoring reports**

<b>Dates of reporting quarter</b>	<b>Broader 1115 DY (if applicable)</b>	<b>SUD DY*</b>	<b>Report due (per STCs schedule)</b>	<b>Measurement period associated with SUD information in report, by reporting category</b>
1/1/2018 - 3/31/2018	DY4 Q1	DY1 Q1	5/30/2018	<ul style="list-style-type: none"> <li>• Protocol in development</li> <li>• Originally submitted 05/31/2018</li> <li>• Update to be submitted with Summative Evaluation</li> </ul>
4/1/2018 – 6/30/2018	DY4 Q2	DY1 Q2	8/29/2018	<ul style="list-style-type: none"> <li>• Protocol in development</li> <li>• Originally submitted 08/31/2018</li> <li>• Update to be submitted with Summative Evaluation</li> </ul>
7/1/2018 – 9/30/2018	DY4 Q3	DY1 Q3	11/29/2018	<ul style="list-style-type: none"> <li>• Protocol in development</li> <li>• Originally submitted 11/31/2018</li> <li>• Update to be submitted with Summative Evaluation</li> </ul>
10/1/2018 – 12/31/2018	DY4 Q4	DY1 Q4	3/31/2019	<ul style="list-style-type: none"> <li>• Protocol in development</li> <li>• Originally submitted on revised submission date of 08/30/2019 at request of CMS</li> <li>• Update to be submitted with Summative Evaluation</li> </ul>
1/1/2019 - 3/31/2019	DY5 Q1	DY2 Q1	5/30/2019	<ul style="list-style-type: none"> <li>• Protocol in development</li> <li>• Originally submitted on revised submission date of 08/30/2019 at request of CMS</li> <li>• Update to be submitted with Summative Evaluation</li> </ul>
4/1/2019 – 6/30/2019	DY5 Q2	DY2 Q2	8/29/2019	<ul style="list-style-type: none"> <li>• Protocol in development</li> <li>• Originally submitted on revised submission date of 12/02/2019 at request of CMS</li> <li>• Update to be submitted with Summative Evaluation</li> </ul>
7/1/2019 – 9/30/2019	DY5 Q3	DY2 Q3	11/29/2019	<ul style="list-style-type: none"> <li>• Protocol in development</li> <li>• Originally submitted on revised submission date of 12/09/2019 at request of CMS</li> <li>• Update to be submitted with Summative Evaluation</li> </ul>
10/1/2019 – 12/31/2019	DY5 Q4	DY2 Q4	3/31/2020	<ul style="list-style-type: none"> <li>• Originally submitted on 3/30/2020</li> <li>• Narrative information for SUD DY2 Q4</li> <li>• Grievances and appeals for SUD DY2 Q4</li> <li>• Monthly and quarterly metrics for SUD DY2 Q3</li> </ul>
1/1/2020 - 3/31/2020	DY6 Q1	DY3 Q1	6/30/2020	<ul style="list-style-type: none"> <li>• Originally submitted on 5/31/2020</li> <li>• Narrative information for SUD DY3 Q1</li> <li>• Grievances and appeals for SUD DY3 Q1</li> <li>• Monthly and quarterly metrics for SUD DY2 Q4</li> <li>• Annual CMS-constructed and state-identified metrics (calculated for SUD DY2)</li> </ul>
4/1/2020 – 6/30/2020	DY6 Q2	DY3 Q2	8/29/2020	<ul style="list-style-type: none"> <li>• Originally submitted on 08/26/2020</li> <li>• Narrative information for SUD DY3 Q2</li> <li>• Grievances and appeals for SUD DY3 Q2</li> <li>• Monthly and quarterly metrics for SUD DY3 Q1</li> </ul>



Dates of reporting quarter	Broader 1115 DY (if applicable)	SUD DY*	Report due (per STCs schedule)	Measurement period associated with SUD information in report, by reporting category
				<ul style="list-style-type: none"> <li>Annual metrics that are established quality measures (calculated for CY 2019)</li> </ul>
7/1/2020 – 9/30/2020	DY6 Q3	DY3 Q3	11/29/2020	<ul style="list-style-type: none"> <li>Narrative information for SUD DY3 Q3</li> <li>Grievances and appeals for SUD DY3 Q3</li> <li>Monthly and quarterly metrics for SUD DY3 Q2</li> <li>Annual metrics that are established quality measures (calculated for CY 2019)</li> <li>Metrics resubmitted from SUD DY2 Q4 through DY3 Q2: <ul style="list-style-type: none"> <li>Annual CMS-constructed and state-identified metrics (calculated for SUD DY2)</li> <li>Monthly and quarterly metrics for SUD DY2 Q3</li> <li>Monthly and quarterly metrics for SUD DY2 Q4</li> <li>Monthly and quarterly metrics for SUD DY3 Q1</li> </ul> </li> </ul>
10/1/2020 – 12/31/2020	DY6 Q4	DY3 Q4	3/31/2021	<ul style="list-style-type: none"> <li>Narrative information for SUD DY3 Q4</li> <li>Grievances and appeals for SUD DY3 Q4</li> <li>Monthly and quarterly metrics for SUD DY3 Q3</li> </ul>
1/1/2021 - 3/31/2021	DY7 Q1	DY4 Q1	5/30/2021	<ul style="list-style-type: none"> <li>Narrative information for SUD DY4 Q1</li> <li>Grievances and appeals for SUD DY4 Q1</li> <li>Monthly and quarterly metrics for SUD DY3 Q4</li> <li>Annual CMS-constructed and state-identified metrics (calculated for SUD DY3)</li> </ul>
4/1/2021 – 6/30/2021	DY7 Q2	DY4 Q2	8/29/2021	<ul style="list-style-type: none"> <li>Narrative information for SUD DY4 Q2</li> <li>Grievances and appeals for SUD DY4 Q2</li> <li>Monthly and quarterly metrics for SUD DY4 Q1</li> <li>Annual metrics that are established quality measures (calculated for CY 2020)</li> </ul>
7/1/2021 – 9/30/2021	DY7 Q3	DY4 Q3	11/29/2021	<ul style="list-style-type: none"> <li>Narrative information for SUD DY4 Q3</li> <li>Grievances and appeals for SUD DY4 Q3</li> <li>Monthly and quarterly metrics for SUD DY4 Q2</li> </ul>
10/1/2021 – 12/31/2021	DY7 Q4	DY4 Q4	3/31/2022	<ul style="list-style-type: none"> <li>Narrative information for SUD DY4 Q4</li> <li>Grievances and appeals for SUD DY4 Q4</li> <li>Monthly and quarterly metrics for SUD DY4 Q3</li> </ul>
1/1/2022 - 3/31/2022	DY8 Q1	DY5 Q1	5/30/2022	<ul style="list-style-type: none"> <li>Narrative information for SUD DY5 Q1</li> <li>Grievances and appeals for SUD DY5 Q1</li> <li>Monthly and quarterly metrics for SUD DY4 Q4</li> <li>Annual CMS-constructed and state-identified metrics (calculated for SUD DY4)</li> </ul>
4/1/2022 – 6/30/2022	DY8 Q2	DY5 Q2	8/29/2022	<ul style="list-style-type: none"> <li>Narrative information for SUD DY5 Q2</li> <li>Grievances and appeals for SUD DY5 Q2</li> <li>Monthly and quarterly metrics for SUD DY5 Q1</li> <li>Annual metrics that are established quality measures (calculated for CY 2021)</li> </ul>

<b>Dates of reporting quarter</b>	<b>Broader 1115 DY (if applicable)</b>	<b>SUD DY*</b>	<b>Report due (per STCs schedule)</b>	<b>Measurement period associated with SUD information in report, by reporting category</b>
7/1/2022 – 9/30/2022	DY8 Q3	DY5 Q3	11/29/2022	<ul style="list-style-type: none"> <li>• Narrative information for SUD DY5 Q3</li> <li>• Grievances and appeals for SUD DY5 Q3</li> <li>• Monthly and quarterly metrics for SUD DY5 Q2</li> </ul>
10/1/2022 – 12/31/2022	DY8 Q4	DY5 Q4	3/31/2023	<ul style="list-style-type: none"> <li>• Narrative information for SUD DY5 Q4</li> <li>• Grievances and appeals for SUD DY5 Q4</li> <li>• Monthly and quarterly metrics for SUD DY5 Q3</li> </ul>