

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



State Demonstrations Group

October 9, 2025

Christine Osterlund
Medicaid Director
Department of Health and Environment
900 SW Jackson Avenue, Suite 900
Topeka, KS 66612

Dear Director Osterlund:

The Centers for Medicare & Medicaid Services (CMS) has completed its review of the Evaluation Design, which is required by the Special Terms and Conditions (STC) #9.3 of Kansas's section 1115 demonstration, "KanCare" (Project No: 11-W-00283/7). CMS has determined that the evaluation design, which was submitted on August 26, 2024, and revised on July 23, 2025, meets the requirements set forth in the STCs and our evaluation design guidance, and therefore approves the state's evaluation design.

CMS has added the approved evaluation design to the demonstration's Special Terms and Conditions (STC) as Attachment E. A copy of the STCs, which includes the new attachment, is enclosed with this letter. In accordance with 42 CFR 431.424, the approved evaluation design may now be posted to the state's Medicaid website within thirty days. CMS will also post the approved evaluation design as a standalone document, separate from the STCs, on [Medicaid.gov](https://www.Medicaid.gov).

Please note that an interim evaluation report, consistent with the approved evaluation design, is due to CMS one year prior to the expiration of the demonstration, or at the time of the extension application, if the state chooses to extend the demonstration. Likewise, a summative evaluation report, consistent with this approved design, is due to CMS within 18 months of the end of the demonstration period. In accordance with 42 CFR 431.428 and the STCs, we look forward to receiving updates on evaluation activities in the annual monitoring reports.

We look forward to our continued partnership on the Kansas KanCare section 1115 demonstration. If you have any questions, please contact your CMS demonstration team.

Sincerely,

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Danielle Daly
Director
Division of Demonstration
Monitoring and Evaluation

cc: Ashli Clark, State Monitoring Lead, CMS Medicaid and CHIP Operations Group

CENTERS FOR MEDICARE & MEDICAID SERVICES

EXPENDITURE AUTHORITY

NUMBER: 11-W-00283/7
TITLE: KanCare Section 1115(a) Demonstration
AWARDEE: Kansas Department of Health and Environment

Under the authority of section 1115(a)(2)(A) of the Social Security Act (the Act), expenditures made by Kansas for the items identified below, which are not otherwise included as expenditures under section 1903 of the Act shall, be regarded as expenditures under the state's title XIX plan.

The following expenditure authorities may only be implemented consistent with the approved Special Terms and Conditions (STCs) and shall enable Kansas to operate the above-identified section 1115 demonstration.

1. **Expenditures for Additional Services for Individuals with Behavioral Health Needs.** Expenditures for the following services furnished to individuals eligible under the approved state plan, pursuant to the limitations and qualifications provided in STC 5.1 to address behavioral health needs:
 - a. Physician Consultation (Case Conferences); and
 - b. Personal Care Services.
2. **Residential and Inpatient Treatment for Individuals with Substance Use Disorder (SUD).** Expenditures for Medicaid state plan services furnished to otherwise eligible individuals who are primarily receiving treatment and/or withdrawal management services for substance use disorder (SUD) who are short-term residents in facilities that meet the definition of an institution for mental disease diseases (IMD).
3. **Continuous Eligibility Period for Parents and Other Caretaker Relatives.** Expenditures for health care related costs for individuals who have been determined eligible under the mandatory group for parents and other caretaker relatives using Modified Adjusted Gross Income (MAGI) Eligibility, as described in sections 1902(a)(10)(A)(i)(I) and 1931(b) and (d) of the Act, for continued benefits during any periods within a twelve month eligibility period when these individuals would be found ineligible if subject to redetermination, as described in STC 4.3.
4. **Continuous Coverage for Individuals Aging Out of CHIP.** Expenditures through the end of the COVID-19 public health emergency (PHE) unwinding period, or until all redeterminations are conducted during the unwinding period, to provide continued eligibility for CHIP enrollees who turned 19 during the PHE (and therefore lost eligibility for CHIP due to age).

CENTERS FOR MEDICARE & MEDICAID SERVICES

SPECIAL TERMS AND CONDITIONS

NUMBER: 11-W-00283/7
TITLE: KanCare
AWARDEE: Kansas Department of Health and Environment

I. PREFACE

The following are the Special Terms and Conditions (STCs) for the “KanCare” section 1115(a) Medicaid demonstration (hereinafter “demonstration”), to enable the Kansas Department of Health and Environment (hereinafter “state” to operate this demonstration). The Centers for Medicare & Medicaid Services (CMS) has granted waivers of requirements under section 1902(a) of the Social Security Act (Act), and expenditure authorities authorizing federal matching of demonstration costs not otherwise matchable, which are separately enumerated. These STCs set forth conditions and limitations on those waivers and expenditure authorities, and describe in detail the nature, character, and extent of federal involvement in the demonstration and the state’s obligations to CMS related to this demonstration. These STCs neither grant additional waivers or expenditure authorities, nor expand upon those separately granted.

The STCs related to the programs for those populations affected by the demonstration are effective from January 1, 2024, through December 31, 2028.

The STCs have been arranged into the following subject areas:

- I. Preface
- II. Program Description and Objectives
- III. General Program Requirements
- IV. Eligibility
- V. Benefits
- VI. Cost Sharing
- VII. Delivery System
- VIII. Monitoring and Reporting Requirements
- IX. Evaluation of the Demonstration
- X. General Financial Requirements
- XI. Monitoring Budget Neutrality for the Demonstration
- XII. Schedule of State Deliverables

Additional attachments have been included to provide supplementary information and guidance for specific STCs.

- Attachment A: Developing the Evaluation Design
Attachment B: Preparing the Interim and Summative Evaluation Reports
Attachment C: SUD Implementation Plan

Attachment D: Monitoring Protocol
Attachment E: Evaluation Design

II. PROGRAM DESCRIPTION AND OBJECTIVES

The KanCare demonstration was originally approved on December 27, 2012, for a five-year demonstration period effective from January 1, 2013, through December 31, 2017. CMS then approved a one-year temporary extension of this demonstration on October 13, 2017, and a five-year extension on December 18, 2018, for an approval period of January 1, 2019, through December 31, 2023. On December 28, 2022, the State of Kansas submitted a Medicaid section 1115 demonstration five-year renewal application to extend certain features of the demonstration. This KanCare this demonstration will continue four programs that have been authorized under expenditure authority.

This five-year demonstration will:

- Maintain 12-month continuous eligibility for parents and caretakers;
- Maintain continuous eligibility for the duration of the COVID-19 PHE unwinding period for CHIP enrollees who turned 19 during the COVID-19 PHE unwinding period (and therefore lost eligibility for CHIP due to age) and who are otherwise ineligible for Medicaid;
- Continue federal financial participation for services provided in an IMD for Medicaid beneficiaries with SUD and
- Continue federal financial participation for physician consultation and personal care services for individuals with behavioral health needs.

The KanCare demonstration will assist the state in its goals to:

- Provide better access to services and reduce ineffective disenrollment for certain populations:
 - Reduce churn or inefficient disenrollment with continuous eligibility for parents and caretakers; and
 - Reduce churn or inefficient disenrollment with continuous eligibility for CHIP enrollees who turned 19 during the COVID-19 PHE unwinding period.
- Improve access to appropriate SUD services, including:
 - Increase rates of identification, initiation, and engagement in treatment for SUD;
 - Increase adherence to and retention in SUD treatment;
 - Reduce overdose deaths, particularly those due to opioids;
 - Reduce utilization of EDs and inpatient hospital settings for treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services;
 - Fewer readmissions to the same or higher level of care where the readmission is preventable or medically inappropriate; and
 - Improve access to care for physical health conditions among beneficiaries with SUD.

- Improve behavioral health outcomes for serious mental illness (SMI)--diagnosed members, including:
 - Enhance community integration; and
 - Reduce psychiatric hospital admissions.

III. GENERAL PROGRAM REQUIREMENTS

- 3.1. **Compliance with Federal Non-Discrimination Laws.** The state must comply with all applicable federal statutes relating to non-discrimination. These include, but are not limited to, the Americans with Disabilities Act of 1990 (ADA), Title VI of the Civil Rights Act of 1964, section 504 of the Rehabilitation Act of 1973 (Section 504), the Age Discrimination Act of 1975, and section 1557 of the Affordable Care Act (Section 1557).
- 3.2. **Compliance with Medicaid and Children’s Health Insurance Program (CHIP) Law, Regulation, and Policy.** All requirements of the Medicaid and CHIP programs expressed in federal law, regulation, and policy statement, not expressly waived or identified as not applicable in the waiver and expenditure authority documents (of which these terms and conditions are part), apply to the demonstration.
- 3.3. **Changes in Medicaid and CHIP Law, Regulation, and Policy.** The state must, within the timeframes specified in federal law, regulation, or written policy, come into compliance with any changes in law, regulation, or policy affecting the Medicaid or CHIP programs that occur during this demonstration approval period, unless the provision being changed is expressly waived or identified as not applicable. In addition, CMS reserves the right to amend the STCs to reflect such changes and/or changes as needed without requiring the state to submit an amendment to the demonstration under STC 3.7. CMS will notify the state 30 business days in advance of the expected approval date of the amended STCs to allow the state to provide comment. Changes will be considered in force upon issuance of the approval letter by CMS. The state must accept the changes in writing.
- 3.4. **Impact on Demonstration of Changes in Federal Law, Regulation, and Policy.**
 - a. To the extent that a change in federal law, regulation, or policy requires either a reduction or an increase in federal financial participation (FFP) for expenditures made under this demonstration, the state must adopt, subject to CMS approval, a modified budget neutrality agreement for the demonstration as necessary to comply with such change. The trend rates for the budget neutrality agreement are not subject to change under this subparagraph. Further, the state may seek an amendment to the demonstration (as per STC 3.7 of this section) as a result of the change in FFP.
 - b. If mandated changes in the federal law require state legislation, unless otherwise prescribed by the terms of the federal law, the changes must take effect on the earlier of the day such state legislation becomes effective, or on the last day such legislation was required to be in effect under the law, whichever is sooner.
- 3.5. **State Plan Amendments.** The state will not be required to submit title XIX or title XXI state plan amendments (SPA) for changes affecting any populations made eligible solely through the demonstration. If a population eligible through the Medicaid or CHIP state plan is affected by a change to the demonstration, a conforming amendment to the appropriate state plan may be required, except as otherwise noted in these STCs. In all such cases, the Medicaid and CHIP state plans governs.

- 3.6. **Changes Subject to the Amendment Process.** Changes related to eligibility, enrollment, benefits, beneficiary rights, delivery systems, cost sharing, sources of non-federal share of funding, budget neutrality, and other comparable program elements must be submitted to CMS as amendments to the demonstration. All amendment requests are subject to approval at the discretion of the Secretary in accordance with section 1115 of the Act. The state must not implement changes to these elements without prior approval by CMS either through an approved amendment to the Medicaid or CHIP state plan or amendment to the demonstration. Amendments to the demonstration are not retroactive and no FFP of any kind, including for administrative or medical assistance expenditures, will be available under changes to the demonstration that have not been approved through the amendment process set forth in STC 3.7, except as provided in STC 3.3.
- 3.7. **Amendment Process.** Requests to amend the demonstration must be submitted to CMS for approval no later than 120 days prior to the planned date of implementation of the change and may not be implemented until approved. CMS reserves the right to deny or delay approval of a demonstration amendment based on non-compliance with these STCs, including but not limited to failure by the state to submit required elements of a complete amendment request as described in this STC, and failure by the state to submit required reports and other deliverables according to the deadlines specified therein. Amendment requests must include, but are not limited to, the following:
- a. An explanation of the public process used by the state, consistent with the requirements of STC 3.12. Such explanation must include a summary of any public feedback received and identification of how this feedback was addressed by the state in the final amendment request submitted to CMS;
 - b. A detailed description of the amendment including impact on beneficiaries, with sufficient supporting documentation;
 - c. A data analysis which identifies the specific “with waiver” impact of the proposed amendment on the current budget neutrality agreement. Such analysis must include current total computable “with waiver” and “without waiver” status on both a summary and detailed level through the current approval period using the most recent actual expenditures, as well as summary and detail projections of the change in the “with waiver” expenditure total as a result of the proposed amendment, which isolates (by Eligibility Group) the impact of the amendment;
 - d. An up-to-date CHIP allotment neutrality worksheet, if necessary;
 - e. The state must provide updates to existing demonstration reporting and quality and evaluation plans. This includes a description of how the evaluation design and annual progress reports will be modified to incorporate the amendment provisions, as well as the oversight, monitoring and measurement of the provisions.
- 3.8. **Extension of the Demonstration.** States that intend to request an extension of the demonstration must submit an application to CMS from the Governor of the state in accordance with the requirements of 42 CFR §431.412(c). States that do not intend to

request an extension of the demonstration beyond the period authorized in these STCs must submit a phase-out plan consistent with the requirements of STC 3.9.

3.9. Demonstration Phase-Out. The state may only suspend or terminate this demonstration in whole, or in part, consistent with the following requirements:

- a. Notification of Suspension or Termination. The state must promptly notify CMS in writing of the reason(s) for the suspension or termination, together with the effective date and a transition and phase-out plan. The state must submit a notification letter and a draft transition and phase-out plan to CMS no less than six months before the effective date of the demonstration's suspension or termination. Prior to submitting the draft transition and phase-out plan to CMS, the state must publish on its website the draft transition and phase-out plan for a 30-day public comment period. In addition, the state must conduct tribal consultation in accordance with STC 3.12, if applicable. Once the 30-day public comment period has ended, the state must provide a summary of the issues raised by the public during the comment period and how the state considered the comments received when developing the revised transition and phase-out plan.
- b. Transition and Phase-out Plan Requirements. The state must include, at a minimum, in its phase-out plan the process by which it will notify affected beneficiaries, the content of said notices (including information on the beneficiary's appeal rights), the process by which the state will conduct redeterminations of Medicaid or CHIP eligibility prior to the termination of the demonstration for the affected beneficiaries, and ensure ongoing coverage for eligible beneficiaries, as well as any community outreach activities the state will undertake to notify affected beneficiaries, including community resources that are available.
- c. Transition and Phase-out Plan Approval. The state must obtain CMS approval of the transition and phase-out plan prior to the implementation of transition and phase-out activities. Implementation of transition and phase-out activities must be no sooner than 14 calendar days after CMS approval of the transition and phase-out plan.
- d. Transition and Phase-out Procedures. The state must redetermine eligibility for all affected beneficiaries in order to determine if they qualify for Medicaid eligibility under a different eligibility category prior to making a determination of ineligibility as required under 42 CFR 35.916(f)(1). For individuals determined ineligible for Medicaid and CHIP, the state must determine potential eligibility for other insurance affordability programs and comply with the procedures set forth in 42 CFR 435.1200(e). The state must comply with all applicable notice requirements found in 42 CFR, part 431 subpart E, including sections 431.206 through 431.214. In addition, the state must assure all applicable appeal and hearing rights are afforded to beneficiaries in the demonstration as outlined in 42 CFR, part 431 subpart E, including sections 431.220 and 431.221. If a beneficiary in the demonstration requests a hearing before the date of action, the state must maintain benefits as required in 42 CFR §431.230.

- e. Exemption from Public Notice Procedures, 42 CFR Section 431.416(g). CMS may expedite the federal and state public notice requirements under circumstances described in 42 CFR 431.416(g).
 - f. Enrollment Limitation during Demonstration Phase-Out. If the state elects to suspend, terminate, or not extend this demonstration, during the last six months of the demonstration, enrollment of new individuals into the demonstration must be suspended. The limitation of enrollment into the demonstration does not impact the state's obligation to determine Medicaid eligibility in accordance with the approved Medicaid state plan.
 - g. Federal Financial Participation (FFP). If the project is terminated or any relevant waivers are suspended by the state, FFP must be limited to normal closeout costs associated with the termination or expiration of the demonstration including services, continued benefits as a result of beneficiaries' appeals, and administrative costs of disenrolling beneficiaries.
- 3.10. **Withdrawal of Waiver or Expenditure Authority.** CMS reserves the right to withdraw waivers and/or expenditure authorities at any time it determines that continuing the waivers or expenditure authorities would no longer be in the public interest or promote the objectives of title XIX and title XXI. CMS will promptly notify the state in writing of the determination and the reasons for the withdrawal, together with the effective date, and afford the state an opportunity to request a hearing to challenge CMS's determination prior to the effective date. If a waiver or expenditure authority is withdrawn, FFP is limited to normal closeout costs associated with terminating the waiver or expenditure authority, including services, continued benefits as a result of beneficiary appeals, and administrative costs of disenrolling beneficiaries.
- 3.11. **Adequacy of Infrastructure.** The state will ensure the availability of adequate resources for implementation and monitoring of the demonstration, including education, outreach, and enrollment; maintaining eligibility systems; compliance with cost sharing requirements; and reporting on financial and other demonstration components.
- 3.12. **Public Notice, Tribal Consultation, and Consultation with Interested Parties.** The state must comply with the state notice procedures as required in 42 CFR 431.408 prior to submitting an application to extend the demonstration. For applications to amend the demonstration, the state must comply with the state notice procedures set forth in 59 Fed. Reg. 49249 (September 27, 1994) prior to submitting such request. The state must comply with the Public Notice Procedures set forth in 42 CFR 447.205 for changes in statewide methods and standards for setting payment rates.
- 3.13. **Federal Financial Participation (FFP).** No federal matching funds for expenditures for this demonstration, including for administrative and medical assistance expenditures, will be available until the effective date identified in the demonstration approval letter, or if later, as expressly stated within these STCs.

- 3.14. **Administrative Authority.** When there are multiple entities involved in the administration of the demonstration, the Single State Medicaid Agency must maintain authority, accountability, and oversight of the program. The State Medicaid Agency must exercise oversight of all delegated functions to operating agencies, MCOs, and any other contracted entities. The Single State Medicaid Agency is responsible for the content and oversight of the quality strategies for the demonstration.
- 3.15. **Common Rule Exemption.** The state must ensure that the only involvement of human subjects in research activities that may be authorized and/or required by this demonstration is for projects which are conducted by or subject to the approval of CMS, and that are designed to study, evaluate, or otherwise examine the Medicaid or CHIP program – including public benefit or service programs, procedures for obtaining Medicaid or CHIP benefits or services, possible changes in or alternatives to Medicaid or CHIP programs and procedures, or possible changes in methods or levels of payment for Medicaid benefits or services. CMS has determined that this demonstration as represented in these approved STCs meets the requirements for exemption from the human subject research provisions of the Common Rule set forth in 45 CFR 46.101(b)(5).

IV. ELIGIBILITY AND ENROLLMENT

- 4.1. **Individuals Eligible for the OUD/SUD Program Benefit.** Under the demonstration, there is no change to Medicaid eligibility for the SUD benefit Standards for eligibility remain set forth under the state plan. The demonstration will allow Kansas Medicaid recipients to receive substance use disorder treatment services in residential and inpatient treatment settings that qualify as an Institution for Mental Diseases (IMD), which are not otherwise matchable expenditures under section 1903 of the Act.
- 4.2. **Individuals Not Otherwise Eligible under the Medicaid State Plan.** Beneficiary eligibility groups who are made eligible for the demonstration by virtue of the expenditure authorities expressly granted in this demonstration are subject to Medicaid laws and regulations, except for those identified as non-applicable in the expenditure authorities for this document. Eligibility criteria are described in STC 4.3 and STC 4.4. Individuals made eligible under this demonstration by virtue of the expenditure authorities expressly granted include:
- a. Individuals in the Parents and Other Caretaker Relatives Group (described in sections 1902(a)(10)(A)(i)(I) and sections 1932(b) and (d) of the Act, and 42 CFR 435.110) who have continued benefits during any part of a twelve-month eligibility period when these individuals would be found ineligible if subject to redetermination.
 - b. Individuals in the Children’s Health Insurance Program (CHIP) who turned 19 during the COVID-19 PHE (and therefore would have lost eligibility for CHIP due to age).
- 4.3. **Continuous Eligibility Period for Parents and Other Caretaker Relatives.**
- a. Duration. The state is authorized to provide a twelve-month continuous eligibility period to Parents and Other Caretaker Relatives specified in STC 4.2(a) regardless of the delivery system through which they receive Medicaid benefits. The twelve-month period shall begin on the effective date of the individual’s eligibility under § 435.915 or most recent redetermination or renewal of eligibility under § 435.916 and extend for twelve months. For individuals already enrolled when the authority to provide twelve months of continuous eligibility goes into effect, the continuous eligibility period begins for each individual on the date the individual was last determined eligible and extends for twelve months.
 - b. Applicability. For Parents and Other Caretaker Relatives described in STC 4.2(a) an individual’s eligibility may not be terminated during a continuous eligibility period, regardless of any changes in circumstances, unless:
 - i. The individual requests voluntary termination of eligibility;
 - ii. The individual ceases to be a resident of the State;
 - iii. The agency determines that eligibility was erroneously granted at the most recent determination, redetermination or renewal of eligibility because of

agency error or fraud, abuse, or perjury attributed to the individual or the individual's representative;

- iv. The individual dies; or
- v. The individual no longer meets the categorical requirements to be a Parent or Caretaker Relative, per 42 CFR §435.4.

4.4. Continuous Coverage for Individuals Aging Out of CHIP.

- a. The state is authorized to provide continuous eligibility for CHIP enrollees who turned 19 during the COVID-19 PHE (and therefore lost eligibility for CHIP due to age), specified in STC 4.2(b), through the end of the COVID-19 PHE and subsequent unwinding period, or until all redeterminations are conducted during the unwinding period.

V. BENEFITS

5.1. **Additional Services.** KanCare MCOs will provide the following services to certain populations below.

a. Additional services covered by the demonstration:

Table 1. Additional Services Covered by the Demonstration

Service	Populations Eligible
<p>Physician Consultation (Case Conferences): Communication between licensed mental health practitioners (LMHP), advanced registered nurse practitioner (ARNP) or Psychiatrist for a patient consultation that is medically necessary for the medical management of the psychiatric conditions. These services are prior-authorized and limited to scheduled face to face meetings to discuss problems associated with the member’s treatment.</p>	<p>Severely and Persistently Mentally Ill (SPMI) adults and Seriously Emotionally Disturbed (SED) youth.</p>
<p>Personal Care Services: These are services provided a consumer with severe and persistent mental illness or a serious emotional disturbance who would otherwise be placed in a more restrictive setting due to significant functional impairments resulting from an identified mental illness. This service enables the consumer to accomplish tasks or engage in activities that they would normally do themselves if they did not have a mental illness. Assistance is in the form of direct support, supervision and/or cuing so that the consumer performs the task by him/herself. Such assistance most often relates to performance of ADL and IADL and includes assistance with maintaining daily routines and/or engaging in activities critical to residing in their home community. These services are prior-authorized.</p>	<p>SPMI and SED not receiving personal care under the SED waiver.</p>

5.2. **Opioid Use Disorder/Substance Use Disorder (OUD/SUD) Program Benefits.** Under this demonstration component, Kansas Medicaid recipients will continue to have access to high-quality, evidence-based SUD treatment services including services provided in residential and inpatient treatment settings that qualify as an IMD, which are not otherwise matchable expenditures under section 1903 of the Act. The state will continue to be eligible to receive FFP for Medicaid beneficiaries who are short-term residents in IMDs under the terms of this demonstration for coverage of medical assistance, including SUD services that would otherwise be matchable if the beneficiary were not residing in an IMD. The state will continue to aim for a statewide average length of stay of 30 days or less in residential treatment settings, to be monitored pursuant to the Monitoring Protocol as outlined in STC 8.6, to ensure short-term residential treatment stays.

Under this demonstration, beneficiaries will have access to high quality, evidence-based SUD treatment services across a comprehensive continuum of care, ranging from residential and inpatient treatment to ongoing chronic care for these conditions in cost-effective community-based settings.

5.3. **SUD Implementation Plan and Health IT Plan.**

- a. The state's SUD Implementation Plan, initially approved for the period from August 7, 2019 through December 31, 2023, remains in effect for the approval period from January 1, 2024 through December 31, 2028, and is affixed to the STCs as Attachment C. Any future modifications to the approved Implementation Plan will require CMS approval. Failure to progress in meeting the milestone goals agreed upon by the state and CMS will result in a funding deferral. The approved SUD Implementation Plan describes the strategic approach and a detailed project implementation plan, including timetables and programmatic content where applicable, for meeting the following milestones which reflect the key goals and objectives of this SUD demonstration project:

- i. *Access to Critical Levels of Care for OUD and other SUDs.* Coverage of SUD treatment services across a comprehensive continuum of care including: outpatient; intensive outpatient; medication assisted treatment (MAT) (medication as well as counseling and other services with sufficient provider capacity to meet needs of Medicaid beneficiaries in the state; intensive levels of care in residential and inpatient settings; and medically supervised withdrawal management, within 12-24 months of demonstration approval;
- ii. *Use of Evidence-based SUD-specific Patient Placement Criteria.* Establishment of a requirement that providers assess treatment needs based on SUD-specific, multidimensional assessment tools, such as the American Society of Addiction Medicine (ASAM) Criteria or other assessment and placement tools that reflect evidence-based clinical treatment guidelines within 12-24 months of demonstration approval;
- iii. *Patient Placement.* Establishment of a utilization management approach such that beneficiaries have access to SUD services at the appropriate level of care and that the interventions are appropriate for the diagnosis and level of care, including an independent process for reviewing placement in residential treatment settings within 12-24 months of demonstration approval;
- iv. *Use of Nationally Recognized SUD-specific Program Standards to set Provider Qualifications for Residential Treatment Facilities.* Currently, residential treatment service providers must be a licensed organization, pursuant to the residential service provider qualifications described in the Kansas Standards for Licensure/ Certification of Alcohol and/or Other Drug Abuse Programs, rev. 1/1/06. The state must establish residential treatment provider qualifications in licensure, policy or provider manuals, managed care contracts or credentialing, or other requirements or guidance that meet program standards in the ASAM Criteria or other nationally recognized, SUD-specific program standards regarding in particular the types of services, hours of clinical care, and credentials of staff for residential treatment settings within 12-24 months of demonstration approval;
- v. *Standards of Care.* Establishment of a provider review process to ensure that residential treatment providers deliver care consistent with the specifications in the ASAM Criteria or other comparable, nationally recognized SUD program standards based on evidence-based clinical treatment guidelines for types of services, hours of clinical care, and credentials of staff for residential treatment settings within 12-24 months of demonstration approval;
- vi. *Standards of Care.* Establishment of a requirement that residential treatment providers offer MAT on-site or facilitate access to MAT off-site within 12-24 months of demonstration approval;
- vii. *Sufficient Provider Capacity at each Level of Care including Medication Assisted Treatment for OUD.* An assessment of the availability of providers in the critical levels of care throughout the state, or in the regions of the state

participating under this demonstration, including those that offer MAT within 12 months of demonstration approval;

- viii. *Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and OUD.* Implementation of opioid prescribing guidelines along with other interventions to prevent prescription drug abuse and expand coverage of and access to naloxone for overdose reversal as well as implementation of strategies to increase utilization and improve functionality of prescription drug monitoring programs;
 - ix. *Improved Care Coordination and Transition between Levels of Care.* Establishment and implementation of policies to ensure residential and inpatient facilities link beneficiaries with community-based services and supports following stays in these facilities within 24 months of demonstration approval.
 - x. *SUD Health IT Plan.* Implementation of a Substance Use Disorder Health Information Technology Plan which describes technology that will support the aims of the demonstration. Further information which describes milestones and metrics as detailed in STC 5.3(b) and Attachment C; and
- b. SUD Health Information Technology Plan (“Health IT Plan”). The state has provided CMS with an assurance that it has a sufficient health IT infrastructure/ “ecosystem” at every appropriate level (i.e. state, delivery system, and individual provider) to achieve the goals of the demonstration – or it will submit to CMS a plan to develop the infrastructure/capabilities.

This “SUD Health IT Plan,” or assurance, will be included as a section of the state’s “Implementation Plan” (see STC 5.3), which will remain in effect for the approval period from January 1, 2024 through December 31, 2028, and is affixed to the STCs as Attachment C. The SUD Health IT Plan does detail the necessary health IT capabilities in place to support beneficiary health outcomes to address the SUD goals of the demonstration. The plan also is used to identify areas of SUD health IT ecosystem improvement.

- i. The state must include in its Monitoring Protocol (see STC 8.6) an approach to monitoring its SUD Health IT Plan which will include performance metrics to be approved in advance by CMS.
- ii. The state must monitor progress, each demonstration year (DY), on the implementation of its SUD Health IT Plan in relationship to its milestones and timelines—and report on its progress to CMS within its Annual Reports (see STC 8.7).
- iii. As applicable, the state should advance the standards identified in the ‘Interoperability Standards Advisory—Best Available Standards and Implementation Specifications’ (ISA) in developing and implementing the state’s SUD Health IT policies and in all related applicable State

procurements (e.g., including managed care contracts) that are associated with this demonstration.

- iv. Where there are opportunities at the state- and provider-level (up to and including usage in MCO or ACO participation agreements) to leverage federal funds associated with a standard referenced in 45 CFR 170 Subpart B, the state should use the federally-recognized standards.
- v. Where there are opportunities at the state- and provider-level to leverage federal funds associated with a standard not already referenced in 45 CFR 170 but included in the ISA, the state should use the federally-recognized ISA standards.
- vi. Components of the Health IT Plan include:
 1. The Health IT Plan must describe the state’s alignment with Section 5042 of the SUPPORT Act requiring Medicaid providers to query a Qualified Prescription Drug Monitoring Program (PDMP)¹.
 2. The Health IT Plan must address how the state’s Qualified PDMP will enhance ease of use for prescribers and other state and federal stakeholders.² States should favor procurement strategies that incorporate qualified PDMP data into electronic health records as discrete data without added interface costs to Medicaid providers, leveraging existing federal investments in RX Check for Interstate data sharing.
 3. The Health IT Plan will describe how technology will support substance use disorder prevention and treatment outcomes described by the demonstration.
 4. In developing the Health IT Plan, states should use the following resources:
 - States may use federal resources available on Health IT.Gov (<https://www.healthit.gov/topic/behavioral-health>) including but not limited to “Behavioral Health and Physical Health Integration” and “Section 34: Opioid Epidemic and Health IT” (<https://www.healthit.gov/playbook/health-information-exchange/>).
 - States may also use the CMS 1115 Health IT resources available on “Medicaid Program Alignment with State Systems to Advance HIT, HIE and Interoperability” at

¹ Prescription drug monitoring programs (PDMP) are electronic databases that track controlled substance prescriptions in states. PDMPs can provide health authorities timely information about prescribing and patient behaviors that contribute to the “opioid” epidemic and facilitate a nimble and targeted response.

² *Ibid.*

<https://www.medicaid.gov/medicaid/data-and-systems/hie/index.html>. States should review the “1115 Health IT Toolkit” for health IT considerations in conducting an assessment and developing their Health IT Plans.

- States may request from CMS technical assistance to conduct an assessment and develop plans to ensure they have the specific health IT infrastructure with regards to PDMP interoperability, electronic care plan sharing, care coordination, and behavioral health-physical health integration, to meet the goals of the demonstration.
- States should review the Office of the National Coordinator’s Interoperability Standards Advisory (<https://www.healthit.gov/isa/>) for information on appropriate standards which may not be required per 45 CFR part 170, subpart B for enhanced funding, but still should be considered industry standards per 42 CFR §433.112(b)(12).

5.4. **Unallowable Expenditures Under the SUD Expenditure Authority.** In addition to the other unallowable costs and caveats already outlined in these STCs, the state may not receive FFP under any expenditure authority approved under this demonstration for any of the following:

- a. Room and board costs for residential treatment service providers unless they qualify as inpatient facilities under section 1905(a) of the Act.

VI. COST SHARING

- 6.1. **Cost Sharing.** Cost sharing imposed upon individuals enrolled in the demonstration is consistent with the provisions of the approved state plan.

VII. DELIVERY SYSTEM

- 7.1. **Delivery System.** No modifications to the current Kansas Medicaid delivery system are proposed through this demonstration. Kansas Medicaid beneficiaries will continue to receive services through the current delivery system.

VIII. MONITORING AND REPORTING REQUIREMENTS

- 8.1. **Deferral for Failure to Submit Timely Demonstration Deliverables.** CMS may issue deferrals in the amount of \$5,000,000 per deliverable (federal share) when items required by these STCs (e.g., required data elements, analyses, reports, design documents, presentations, and other items specified in these STCs (hereafter singularly or collectively referred to as “deliverable(s)”) are not submitted timely to CMS or found to not be consistent with the requirements approved by CMS. A deferral shall not exceed the value of the federal amount for the demonstration period. The state does not relinquish its rights provided under 42 CFR part 430 subpart C to challenge any CMS finding that the state materially failed to comply with the terms of this agreement.
- a. The following process will be used: 1) 30 calendar days after the deliverable(s) were due if the state has not submitted a written request to CMS for approval of an extension as described in subsection (c) below; or 2) 30 calendar days after CMS has notified the state in writing that the deliverable(s) were not accepted for being inconsistent with the requirements of this agreement and the information needed to bring the deliverable(s) into alignment with CMS requirements. requirements.
 - b. CMS will issue a written notification to the state providing advance notification of a pending deferral for late or non-compliant submissions of required deliverable(s).
 - c. For each deliverable, the state may submit to CMS a written request for an extension to submit the required deliverable that includes a supporting rationale for the cause(s) of the delay, the steps the state has taken to address such issue(s), and the state’s anticipated date of submission. Should CMS agree in writing to the state’s request, a corresponding extension of the deferral process described below can be provided. CMS may agree to a corrective action plan as an interim step before applying the deferral, if the states proposes a corrective action plan in the state’s written extension request.
 - d. If CMS agrees to an interim corrective plan in accordance with subsection (c) above, and the state fails to comply with the corrective action plan or, despite the corrective action plan, still fails to submit the overdue deliverable(s) with all required contents in satisfaction of the terms of this agreement, CMS may proceed with the issuance of a deferral against the next Quarterly Statement of Expenditures reported in Medicaid Budget and Expenditure System/State Children's Health Insurance Program Budget and Expenditure System (MBES/CBES) following a written deferral notification to the state..
 - e. If the CMS deferral process has been initiated for state non-compliance with the terms of this agreement with respect to the required deliverable(s), and the state submits the overdue deliverable(s), and such deliverable(s) are accepted by CMS as meeting the standards outlined in these STCs, the deferral(s) will be released.
 - f. As the purpose of a section 1115 demonstration is to test new methods of operation or service delivery, a state’s failure to submit all required reports, evaluations, and other

deliverables will be considered by CMS in reviewing any application for an extension, amendment, or for a new demonstration.

- 8.2. **Deferral of Federal Financial Participation (FFP) from IMD claiming for Insufficient Progress Toward Milestones.** Up to \$5,000,000 in FFP for services in IMDs may be deferred if the state is not making adequate progress on meeting the milestones and goals as evidenced by reporting on the milestones in the Implementation Plan and the required performance measures in the Monitoring Protocol agreed upon by the state and CMS. Once CMS determines the state has not made adequate progress, up to \$5,000,000 will be deferred in the next calendar quarter and each calendar quarter thereafter until CMS has determined sufficient progress has been made.
- 8.3. **Submission of Post-Approval Deliverables.** The state must submit all deliverables as stipulated by CMS and within the timeframes outlined within these STCs.
- 8.4. **Electronic Submission of Reports.** The state must submit all monitoring and evaluation report deliverables required in these STCs (e.g., quarterly reports, annual reports, evaluation reports) electronically, through CMS' designated electronic system.
- 8.5. **Compliance with Federal Systems Updates.** As federal systems continue to evolve and incorporate additional 1115 waiver reporting and analytics functions, the state will work with CMS to:
 - a. Revise the reporting templates and submission processes to accommodate timely compliance with the requirements of the new systems;
 - b. Ensure all section 1115 demonstration, Transformed Medicaid Statistical Information System (T-MSIS), and other data elements that have been agreed to for reporting and analytics are provided by the state; and
 - c. Submit deliverables to the appropriate system as directed by CMS.
- 8.6. **Monitoring Protocol.** The state must submit to CMS a draft Monitoring Protocol for the demonstration within 150 calendar days after approval of the demonstration extension. The Monitoring Protocol must be developed in cooperation with CMS and is subject to CMS approval. The state must submit a revised Monitoring Protocol within 60 calendar days after receipt of CMS' comments, if any. Once approved, the Monitoring Protocol will be incorporated into the STCs, as Attachment D. Progress on the performance measures identified in the Monitoring Protocol must be reported via the Quarterly and Annual Monitoring Reports. Components of the Monitoring Protocol include:
 - a. An assurance of the state's commitment and ability to report information relevant to each of the program implementation areas listed in Attachment C and information relevant to the state's Health IT Plan described in STC 5.3;
 - b. A description of the methods of data collection and timeframes for reporting on the state's progress on required measures as part of the general monitoring and reporting

requirements described in Section VIII (General Reporting Requirements) of the demonstration; and

- c. A description of baselines and targets to be achieved by the end of the demonstration. Where possible, baselines will be informed by state data, and targets will be benchmarked against performance in best practice settings.

8.7. **Monitoring Reports.** The state must submit three Quarterly Monitoring Reports and one Annual Monitoring Report each demonstration year (DY). The fourth-quarter information that would ordinarily be provided in a separate Quarterly Monitoring Report should be reported as distinct information within the Annual Monitoring Report. The Quarterly Monitoring Reports are due no later than 60 calendar days following the end of each demonstration quarter. The Annual Monitoring Report (including the fourth-quarter information) is due no later than 90 calendar days following the end of the DY. The state must submit a revised Monitoring Report within 60 calendar days after receipt of CMS's comments, if any. The reports will include all required elements as per 42 CFR 431.428 and must not direct readers to links outside the report. Additional links not referenced in the document may be listed in a Reference/Bibliography section. The Quarterly and Annual Monitoring Reports must follow the framework to be provided by CMS, which is subject to change as monitoring systems are developed/evolve and be provided in a structured manner that supports federal tracking and analysis.

- a. **Operational Updates.** Per 42 CFR 431.428, the Monitoring Reports must document any policy or administrative difficulties in operating the demonstration. The reports shall provide sufficient information to document key operational and other challenges, underlying causes of challenges, and how challenges are being addressed. The discussion should also include any issues or complaints identified by beneficiaries; lawsuits or legal actions; unusual or unanticipated trends; updates on the state's financing plan and maintenance of effort described in STC 5.3; legislative updates; and descriptions of any public forums held. In addition, Monitoring Reports should describe key achievements, as well as the conditions and efforts to which these successes can be attributed. The Monitoring Reports should also include a summary of all public comments received through post-award public forums regarding the progress of the demonstration.
- b. **Performance Metrics.** The performance metrics will provide data to demonstrate how the state is progressing toward meeting the goals and milestones – including relative to their projected timelines – of the demonstration's program and policy implementation and infrastructure investments, and transitional non-service expenditures, as applicable and must cover all key policies under this demonstration. Additionally, per 42 CFR 431.428, the Monitoring Reports must document the impact of the demonstration in providing insurance coverage to beneficiaries, as well as on beneficiaries' outcomes of care, quality and cost of care, and access to care. This may also include the results of beneficiary satisfaction or experience of care surveys, if conducted, as well as grievances and appeals.

The state and CMS will work collaboratively to finalize the list of metrics to be reported on in demonstration Monitoring Reports. The demonstration's metrics reporting must cover categories including, but not limited to: enrollment and renewal, including the percent of renewals completed ex-parte (administratively), access to providers, utilization of services, and quality of care and health outcomes. The state must undertake robust reporting of quality of care and health outcomes metrics aligned with the demonstration's policies and objectives to be reported for all demonstration populations. Such reporting must also be stratified by key demographic subpopulations of interest (e.g., by sex, age, race/ethnicity, primary language, disability status, and geography) and by demonstration component, to the extent feasible. Subpopulation reporting will support identifying any existing shortcomings or disparities in quality of care and health outcomes and help track whether the demonstration's initiatives help improve outcomes for the state's Medicaid population, including the narrowing of any identified disparities. To that end, CMS underscores the importance of the state's reporting of quality of care and health outcomes metrics known to be important for closing key equity gaps in Medicaid/CHIP (e.g., NQF "disparities-sensitive" measures) and prioritizing key outcome measures and their clinical and non-clinical (i.e., social) drivers of health. In coordination with CMS, the state is expected to select such measures for reporting in alignment with a critical set of equity-focused measures CMS is finalizing as part of its upcoming guidance on the Health Equity Measure Slate, as applicable to the demonstration initiatives and populations. If needed, the state may submit an amendment to its monitoring plan no more than 150 days after receiving the final Health Equity Measure Slate from CMS to incorporate these measures.

- i. For the SUD component, the state's monitoring must align with the CMS approved SUD Monitoring Protocol (see STC 8.6), and will cover metrics in alignment with assessment of need and qualification for SUD treatment services and the demonstration's six milestones as outlined in the State Medicaid Director Letter (SMDL) dated November 1, 2017 (SMDL #17- 003).³

In addition, if the state, health plans, or health care providers will contract or partner with organizations to implement the demonstration, the state must use monitoring metrics that track the number and characteristics of contracted or participating organizations and corresponding payment-related metrics.

The required monitoring and performance metrics must be included in the Monitoring Reports and will follow the framework provided by CMS to support federal tracking and analysis.

- c. **Budget Neutrality and Financial Reporting Requirements.** Per 42 CFR 431.428, the Monitoring Reports must document the financial performance of the

³ SMDL #17-003, Strategies to Address the Opioid Epidemic. Available at: <https://www.medicaid.gov/federal-policy-guidance/downloads/smd17003.pdf>

demonstration. The state must provide an updated budget neutrality workbook with every Monitoring Report that meets all the reporting requirements for monitoring budget neutrality set forth in the General Financial Requirements section of these STCs, including the submission of corrected budget neutrality data upon request. In addition, the state must report quarterly, and annual expenditures associated with the populations affected by this demonstration on the Form CMS-64. Administrative costs for this demonstration should be reported separately on the Form CMS-64.

- d. **Evaluation Activities and Interim Findings.** Per 42 CFR 431.428, the Monitoring Reports must document any results of the demonstration to date per the evaluation hypotheses. Additionally, the state shall include a summary of the progress of evaluation activities, including key milestones accomplished, as well as challenges encountered and how they were addressed.
- e. **SUD Health IT.** The state will include a summary of progress made in regards to SUD Health IT requirements outlined in STC 5.3(b).

8.8. **SUD Mid-Point Assessment.** The state must contract with an independent entity to conduct an independent Mid-Point Assessment by December 31, 2026. This timeline will allow for the Mid-Point Assessment Report to capture approximately the first two-and-a-half years of demonstration program data, accounting for data run-out and data completeness. In addition, if applicable, the state should use the prior approval period experiences as context and conduct the Mid-Point Assessment in light of the data from any such prior approval period(s). In the design, planning and conduct of the Mid- Point Assessment, the state must require that the independent assessor consult with key stakeholders including, but not limited to: representatives of MCOs, health care providers (including SUD treatment providers), beneficiaries, community groups, and other key partners.

- a. The state must require that the assessor provide a Mid-Point Assessment Report to the state that includes the methodologies used for examining progress and assessing risk, the limitations of the methodologies, its determinations and any recommendations. The state must provide a copy of the report to CMS no later than 60 calendar days after December 31, 2026. If requested, the state must brief CMS on the report. The state must submit a revised Mid-Point Assessment Report within 60 calendar days after receipt of CMS's comments, if any.
- b. For milestones and measure targets at medium to high risk of not being achieved, the state must submit to CMS modifications to the SUD Implementation Plan and SUD Monitoring Protocol for ameliorating these risks. Modifications to the Implementation, Financing Plan, and Monitoring Protocol are subject to CMS approval.
- c. Elements of the Mid-Point Assessment must include:
 - i. An examination of progress toward meeting each milestone and timeframe approved in the SUD Implementation Plans and toward meeting the targets for performance measures as approved in the SUD Monitoring Protocol;

- ii. A determination of factors that affected achievement on the milestones and performance measure gap closure percentage points to date;
- iii. A determination of selected factors likely to affect future performance in meeting milestones and targets not yet met and information about the risk of possibly missing those milestones and performance targets;
- iv. For milestones or targets at medium to high risk of not being met, recommendations for adjustments in the state's SUD Implementation Plan, or to pertinent factors that the State can influence that will support improvement, and
- v. An assessment of whether the state is on track to meet the SUD budget neutrality requirements in these STCs.

8.9. **Corrective Action Plan Related to Monitoring.** If monitoring indicates that demonstration features are not likely to assist in promoting the objectives of Medicaid, CMS reserves the right to require the state to submit a corrective action plan to CMS for approval. A corrective action plan could include a temporary suspension of implementation of demonstration programs in circumstances where monitoring data indicate substantial and sustained directional change inconsistent with demonstration goals, such as substantial and sustained trends indicating increased difficulty accessing services. A corrective action plan may be an interim step to withdrawing waivers or expenditure authorities, as outlined in STC 3.10. CMS will withdraw an authority, as described in STC 3.10, when metrics indicate substantial and sustained directional change inconsistent with the state's demonstration goals, and the state has not implemented corrective action. CMS further has the ability to suspend implementation of the demonstration should corrective actions not effectively resolve these concerns in a timely manner.

8.10. **Close-out Report.** Within 120 days after the expiration of the demonstration, the state must submit a draft Close Out Report to CMS for comments.

- a. The Close-Out Report must comply with the most current guidance from CMS.
- b. In consultation with CMS, and per guidance from CMS, the state will include an evaluation of the demonstration (or demonstration components) that are to phase out or expire without extension along with the Close-Out Report. Depending on the timeline of the phase-out during the demonstration approval period, in agreement with CMS, the evaluation requirement may be satisfied through the Interim and/or Summative Evaluation Reports stipulated in STCs 9.7 and 9.8, respectively.
- c. The state will present to and participate in a discussion with CMS on the Close-Out report.
- d. The state must take into consideration CMS' comments for incorporation into the final Close-Out Report.
- e. A revised Close-Out Report is due to CMS no later than 30 calendar days after receipt of CMS's comments.

- f. A delay in submitting the draft or final version of the Close-Out Report may subject the state to penalties described in STC 8.1.

8.11. **Monitoring Calls.** CMS will convene periodic conference calls with the state.

- a. The purpose of these calls is to discuss ongoing demonstration operation, including (but not limited to) any significant actual or anticipated developments affecting the demonstration. Examples include implementation activities, trends in reported data on metrics and associated mid-course adjustments, budget neutrality, enrollment and access and progress on evaluation activities. activities.
- b. CMS will provide updates on any pending actions, as well as federal policies and issues that may affect any aspect of the demonstration.
- c. The state and CMS will jointly develop the agenda for the calls.

8.12. **Post Award Forum.** Pursuant to 42 CFR 431.420(c), within six months of the demonstration's implementation, and annually thereafter, the state must afford the public with an opportunity to provide meaningful comment on the progress of the demonstration. At least 30 calendar days prior to the date of the planned public forum, the state must publish the date, time and location of the forum in a prominent location on its Medicaid website. The state must also post the most recent Annual Monitoring Report on its Medicaid website with the public forum announcement. Pursuant to 42 CFR 431.420(c), the state must include a summary of the public comments in the Annual Monitoring Report associated with the year in which the forum was held.

IX. EVALUATION OF THE DEMONSTRATION

- 9.1. **Cooperation with Federal Evaluators and Learning Collaborative.** As required under 42 CFR 431.420(f), the state must cooperate fully and timely with CMS and its contractors in any federal evaluation of the demonstration or any component of the demonstration. This includes, but is not limited to, commenting on design and other federal evaluation documents and providing data and analytic files to CMS, including entering into a data use agreement that explains how the data and data files will be exchanged, and providing a technical point of contact to support specification of the data and files to be disclosed, as well as relevant data dictionaries and record layouts. The state must include in its contracts with entities who collect, produce, or maintain data and files for the demonstration, that they must make such data available for the federal evaluation as is required under 42 CFR 431.420(f) to support federal evaluation. This may also include the state’s participation – including representation from the state’s contractors, independent evaluators, and organizations associated with the demonstration operations, as applicable – in a federal learning collaborative aimed at cross-state technical assistance, and identification of lessons learned and best practices for demonstration measurement, data development, implementation, monitoring and evaluation. The state may claim administrative match for these activities. Failure to comply with this STC may result in a deferral being issued as outlined in STC 8.1.
- 9.2. **Independent Evaluator.** The state must use an independent party to conduct an evaluation of the demonstration to ensure that the necessary data is collected at the level of detail needed to research the approved hypotheses. The independent party must sign an agreement to conduct the demonstration evaluation in an independent manner in accordance with the CMS-approved draft Evaluation Design. When conducting analyses and developing the evaluation reports, every effort should be made to follow the approved methodology. However, the state may request, and CMS may agree to, changes in the methodology in appropriate circumstances.
- 9.3. **Draft Evaluation Design.** The state must submit, for CMS comment and approval, a draft Evaluation Design no later than 180 calendar days after the approval of the demonstration. The Evaluation Design must be drafted in accordance with:
- a. Attachment A (Developing the Evaluation Design) of these STCs,
 - b. CMS’s evaluation design guidance for SUD demonstrations, including guidance about SUD and overall demonstration sustainability, and
 - c. Any applicable CMS evaluation guidance and technical assistance for the demonstration’s other policy components.

The draft Evaluation Design must also be developed in alignment with CMS guidance on applying robust evaluation approaches, such as quasi-experimental methods like difference-in-differences and interrupted time series, as well as establishing valid comparison groups and assuring causal inferences in demonstration evaluations. In addition to these requirements, if determined culturally appropriate for the communities impacted by the demonstration, the state is encouraged to consider implementation approaches involving randomized control trials and staged rollout (for example, across geographic areas, by service setting, or by beneficiary

characteristic), as these implementation strategies help create strong comparison groups and facilitate robust evaluation. The state is strongly encouraged to use the expertise of the independent party in the development of the draft Evaluation Design. The draft Evaluation Design also must include a timeline for key evaluation activities, including the deliverables outlined in STCs 9.7 and 9.8.

For any amendment to the demonstration, the state will be required to update the approved Evaluation Design or submit a new Evaluation Design to accommodate the amendment component. The amended Evaluation Design must be submitted to CMS for review no later than 180 calendar days after CMS's approval of the demonstration amendment. Depending on the scope and timing of the amendment, in consultation with CMS, the state may provide the details on necessary modifications to the approved Evaluation Design via the monitoring reports. The amendment Evaluation Design must also be reflected in the state's Interim and Summative Evaluation Reports, described below.

- 9.4. **Evaluation Budget.** A budget for the evaluation must be provided with the draft Evaluation Design. It will include the total estimated cost, as well as a breakdown of estimated staff, administrative and other costs for all aspects of the evaluation such as any survey and measurement development, quantitative and qualitative data collection and cleaning, analyses, and report generation. A justification of the costs may be required by CMS if the estimates provided do not appear to sufficiently cover the costs of the design or if CMS finds that the design is not sufficiently developed, or if the estimates appear to be excessive.
- 9.5. **Evaluation Design Approval and Updates.** The state must submit to CMS a revised draft Evaluation Design within 60 calendar days after receipt of CMS' comments, if any. Upon CMS approval of the draft Evaluation Design, the document will be included as an attachment to these STCs. Per 42 CFR 431.424(c), the state will publish the approved Evaluation Design within 30 calendar days of CMS approval. The state must implement the evaluation design and submit a description of its evaluation progress in each of the Quarterly and Annual Monitoring Reports. Once CMS approves the evaluation design, if the state wishes to make changes, the state must submit a revised evaluation design to CMS for approval if the changes are substantial in scope; otherwise, in consultation with CMS, the state may include updates to the Evaluation Design in Monitoring Reports.
- 9.6. **Evaluation Questions and Hypotheses.** Consistent with Attachments A and B (Developing the Evaluation Design and Preparing the Interim and Summative Evaluation Reports) of these STCs, the evaluation deliverables must include a discussion of the evaluation questions and hypotheses that the state intends to test. In alignment with applicable CMS evaluation guidance and technical assistance, the evaluation must outline and address well-crafted hypotheses and research questions for all key demonstration policy components that support understanding the demonstration's impact and its effectiveness in achieving the goals.

The hypothesis testing should include, where possible, assessment of both process and outcome measures. The evaluation must study outcomes, such as likelihood of enrollment and enrollment continuity, and various measures of access, utilization, and health outcomes, as appropriate and in alignment with applicable CMS evaluation guidance and technical assistance, for the demonstration policy components. Proposed measures should be selected

from nationally recognized sources and national measures sets, where possible. Measures sets could include CMS's Core Set of Children's Health Care Quality Measures for Medicaid and CHIP (Child Core Set) and the Core Set of Adult Health Care Quality Measures for Medicaid (Adult Core Set), collectively referred to as the CMS Child and Adult Core Measure Sets for Medicaid and CHIP; Consumer Assessment of Health Care Providers and Systems (CAHPS); the Behavioral Risk Factor Surveillance System (BRFSS) survey; and/or measures endorsed by National Quality Forum (NQF). CMS underscores the importance of the state undertaking a well-designed beneficiary survey and/or interviews to assess, for instance, beneficiary understanding of and experience with the various demonstration policy components, including but not limited to the continuous eligibility and coverage, and beneficiary experiences with access to and quality of care.

Specifically, evaluation hypotheses for the SUD component of the demonstration must support an assessment of the demonstration's success in achieving the core goals of the program through addressing, among other outcomes, initiation and compliance with treatment, utilization of health services in appropriate care settings, and reductions in key outcomes such as deaths due to overdose. The state must evaluate how the continuous eligibility policy affects coverage, enrollment, churn (i.e., temporary loss of coverage in which beneficiaries are disenrolled but then re-enroll within 12 months) as well as population-specific appropriate measures of service utilization and health outcomes. In addition, the state may conduct a comprehensive qualitative assessment involving beneficiary focus groups and interviews with key stakeholders to assess the merits of such policies.

As part of its evaluation efforts, the state must also conduct a demonstration cost assessment to include, but not be limited to, administrative costs of demonstration implementation and operation and Medicaid health services expenditures.. In addition, the state must use findings from hypothesis tests aligned with other demonstration goals and cost analyses to assess the demonstration's effects on the fiscal sustainability of the state's Medicaid program.

Finally, the state must accommodate data collection and analyses stratified by key subpopulations of interest (e.g., by sex, age, race/ethnicity, English language proficiency, primary language, disability status, and geography). Such stratified data analyses will provide a fuller understanding of existing disparities in access to and quality of care and health outcomes and help inform how the demonstration's various policies might support reducing such disparities.

- 9.7. **Interim Evaluation Report.** The state must submit an Interim Evaluation Report for the completed years of the demonstration, and for each subsequent renewal or extension of the demonstration, as outlined in 42 CFR 431.412(c)(2)(vi). When submitting an application for renewal, the Evaluation Report should be posted to the state's website with the application for public comment.
- a. The Interim Evaluation Report will discuss evaluation progress and present findings to date as per the approved evaluation design.
 - b. For demonstration authority or any components within the demonstration that expire prior to the overall demonstration's expiration date, and depending on the timeline of

expiration/phase-out, the Interim Evaluation Report must include an evaluation of the authority, to be collaboratively determined by CMS and the state.

- c. If the state is seeking to extend the demonstration, the draft Interim Evaluation Report is due when the application for the extension is submitted, or one year prior to the end of the demonstration, whichever is sooner. If the state made changes to the demonstration in its application for extension, the research questions and hypotheses and a description of how the design was adapted should be included. If the state is not requesting an extension for a demonstration, an Interim Evaluation Report is due one year prior to the end of the demonstration. For demonstration phase-outs prior to the expiration of the approval period, the draft Interim Evaluation Report is due to CMS on the date that will be specified in the notice of termination or suspension.
- d. The state must submit the revised Interim Evaluation Report 60 calendar days after receiving CMS's comments on the draft Interim Evaluation Report, if any.
- e. Once approved by CMS, the state must post the final Interim Evaluation Report to the state's Medicaid website within 30 calendar days.
- f. The Interim Evaluation Report must comply with Attachment B (Preparing the Evaluation Report) of these STCs.

9.8. **Summative Evaluation Report.** The state must draft Summative Evaluation Report for the demonstration's current approval period within eighteen (18) months of the end of the approval period represented by these STCs. The draft Summative Evaluation Report must be developed in accordance with Attachment B (Preparing the Interim and Summative Evaluation Reports) of these STCs, and in alignment with the approved Evaluation Design.

- a. Unless otherwise agreed upon in writing by CMS, the state must submit the revised Summative Evaluation Report within 60 calendar days of receiving comments from CMS on the draft, if any.
- b. Once approved by CMS, the state must post the final Summative Evaluation Report to the state's Medicaid website within 30 calendar days.

9.9. **Corrective Action Plan Related to Evaluation.** If evaluation findings indicate that demonstration features are not likely to assist in promoting the objectives of Medicaid, CMS reserves the right to require the state to submit a corrective action plan to CMS for approval. These discussions may also occur as part of an extension process when associated with the state's Interim Evaluation Report, or as part of the review of the Summative Evaluation Report. A corrective action plan could include a temporary suspension of implementation of demonstration programs, in circumstances where evaluation findings indicate substantial and sustained directional change inconsistent with demonstration goals, such as substantial and sustained trends indicating increased difficulty accessing services. A corrective action plan may be an interim step to withdrawing waivers or expenditure authorities, as outlined in STC 3.10. CMS further has the ability to suspend implementation of the demonstration should corrective actions not effectively resolve these concerns in a timely manner.

- 9.10. **State Presentations for CMS.** CMS reserves the right to request that the state present and participate in a discussion with CMS on the Evaluation Design, the Interim Evaluation, and/or the Summative Evaluation Report.
- 9.11. **Public Access.** The state shall post the final documents (e.g., Implementation Plan, Monitoring Protocol, Monitoring Reports, Mid-Point Assessment, Close Out Report, approved Evaluation Design, Interim Evaluation Report, and Summative Evaluation Report) on the state’s Medicaid website within 30 calendar days of approval by CMS.
- 9.12. **Additional Publications and Presentations.** For a period of 12 months following CMS approval of the final reports, CMS will be notified prior to presentation of these reports or their findings, including in related publications (including, for example, journal articles), by the state, contractor, or any other third party directly connected to the demonstration over which the state has control. Prior to release of these reports, articles or other publications, CMS will be provided a copy including any associated press materials. CMS will be given 30 calendar days to review and comment on publications before they are released. CMS may choose to decline to comment or review some or all of these notifications and reviews. This requirement does not apply to the release or presentation of these materials to state or local government officials.

X. GENERAL FINANCIAL REQUIREMENTS

- 10.1. **Allowable Expenditures.** This demonstration project is approved for authorized demonstration expenditures applicable to services rendered and for costs incurred during the demonstration approval period designated by CMS. CMS will provide FFP for allowable demonstration expenditures only so long as they do not exceed the pre-defined limits as specified in these STCs.
- 10.2. **Standard Medicaid Funding Process.** The standard Medicaid funding process will be used for this demonstration. The state will provide quarterly expenditure reports through the Medicaid and CHIP Budget and Expenditure System (MBES/CBES) to report total expenditures under this Medicaid section 1115 demonstration following routine CMS-37 and CMS-64 reporting instructions as outlined in section 2500 of the State Medicaid Manual. The state will estimate matchable demonstration expenditures (total computable and federal share) subject to the budget neutrality expenditure limit and separately report these expenditures by quarter for each federal fiscal year on the form CMS-37 for both the medical assistance payments (MAP) and state and local administration costs (ADM). CMS shall make federal funds available based upon the state's estimate, as approved by CMS. Within thirty (30) days after the end of each quarter, the state shall submit form CMS-64 Quarterly Medicaid Expenditure Report, showing Medicaid expenditures made in the quarter just ended. If applicable, subject to the payment deferral process, CMS shall reconcile expenditures reported on form CMS-64 with federal funding previously made available to the state, and include the reconciling adjustment in the finalization of the grant award to the state.
- 10.3. **Sources of Non-Federal Share.** As a condition of demonstration approval, the state certifies that its funds that make up the non-federal share are obtained from permissible state and/or local funds that, unless permitted by law, are not other federal funds. The state further certifies that federal funds provided under this section 1115 demonstration must not be used as the non-federal share required under any other federal grant or contract, except as permitted by law. CMS approval of this demonstration does not constitute direct or indirect approval of any underlying source of non-federal share or associated funding mechanisms and all sources of non-federal funding must be compliant with section 1903(w) of the Act and applicable implementing regulations. CMS reserves the right to deny FFP in expenditures for which it determines that the sources of non-federal share are impermissible.

- a. If requested, the state must submit for CMS review and approval documentation of any sources of non-federal share that would be used to support payments under the demonstration.
- b. If CMS determines that any funding sources are not consistent with applicable federal statutes or regulations, the state must address CMS's concerns within the time frames allotted by CMS.
- c. Without limitation, CMS may request information about the non-federal share sources for any amendments that CMS determines may financially impact the demonstration.

10.4. **State Certification of Funding Conditions.** As a condition of demonstration approval, the state certifies that the following conditions for non-federal share financing of demonstration expenditures have been met:

- a. If units of state or local government, including health care providers that are units of state or local government, supply any funds used as non-federal share for expenditures under the demonstration, the state must certify that state or local monies have been expended as the non-federal share of funds under the demonstration in accordance with section 1903(w) of the Act and applicable implementing regulations.
- b. To the extent the state utilizes certified public expenditures (CPE) as the funding mechanism for the non-federal share of expenditures under the demonstration, the state must obtain CMS approval for a cost reimbursement methodology. This methodology must include a detailed explanation of the process, including any necessary cost reporting protocols, by which the state identifies those costs eligible for purposes of certifying public expenditures. The certifying unit of government that incurs costs authorized under the demonstration must certify to the state the amount of public funds allowable under 42 CFR 433.51 it has expended. The federal financial participation paid to match CPEs may not be used as the non-federal share to obtain additional federal funds, except as authorized by federal law, consistent with 42 CFR 433.51(c).
- c. The state may use intergovernmental transfers (IGT) to the extent that the transferred funds are public funds within the meaning of 42 CFR 433.51 and are transferred by units of government within the state. Any transfers from units of government to support the non-federal share of expenditures under the demonstration must be made in an amount not to exceed the non-federal share of the expenditures under the demonstration.
- d. Under all circumstances, health care providers must retain 100 percent of their payments for or in connection with furnishing covered services to beneficiaries. Moreover, no pre-arranged agreements (contractual, voluntary, or otherwise) may exist between health care providers and state and/or local governments, or third parties to return and/or redirect to the state any portion of the Medicaid payments in a manner inconsistent with the requirements in section 1903(w) of the Act and its

implementing regulations. This confirmation of Medicaid payment retention is made with the understanding that payments that are the normal operating expenses of conducting business, such as payments related to taxes, including health care provider-related taxes, fees, business relationships with governments that are unrelated to Medicaid and in which there is no connection to Medicaid payments, are not considered returning and/or redirecting a Medicaid payment.

- e. The State Medicaid Director or his/her designee certifies that all state and/or local funds used as the state's share of the allowable expenditures reported on the CMS-64 for this demonstration were in accordance with all applicable federal requirements and did not lead to the duplication of any other federal funds.

10.5. Financial Integrity for Managed Care Delivery Systems. As a condition of demonstration approval, the state attests to the following, as applicable:

- a. All risk-based managed care organization, prepaid inpatient health plan (PIHP), and prepaid ambulatory health plan (PAHP) payments, comply with the requirements on payments in 42 CFR 438.6(b)(2), 438.6(c), 438.6(d), 438.60, and 438.74.

10.6. Requirements for Health Care-Related Taxes and Provider Donations. As a condition of demonstration approval, the state attests to the following, as applicable:

- a. Except as provided in paragraph (c) of this STC, all health care-related taxes as defined by Section 1903(w)(3)(A) of the Act and 42 CFR 433.55 are broad-based as defined by Section 1903(w)(3)(B) of the Act and 42 CFR 433.68(c).
- b. Except as provided in paragraph (c) of this STC, all health care-related taxes are uniform as defined by Section 1903(w)(3)(C) of the Act and 42 CFR 433.68(d).
- c. If the health care-related tax is either not broad-based or not uniform, the state has applied for and received a waiver of the broad-based and/or uniformity requirements as specified by 1903(w)(3)(E)(i) of the Act and 42 CFR 433.72.
- d. The tax does not contain a hold harmless arrangement as described by Section 1903(w)(4) of the Act and 42 CFR 433.68(f).
- e. All provider-related donations as defined by 42 CFR 433.52 are bona fide as defined by Section 1903(w)(2)(B) of the Social Security Act, 42 CFR 433.66, and 42 CFR 433.54.

10.7. State Monitoring of Non-federal Share. If any payments under the demonstration are funded in whole or in part by a locality tax, then the state must provide a report to CMS regarding payments under the demonstration no later than sixty (60) days after demonstration approval. This deliverable is subject to the deferral as described in STC 8.1. This report must include:

- a. A detailed description of and a copy of (as applicable) any agreement, written or otherwise agreed upon, regarding any arrangement among the providers including

those with counties, the state, or other entities relating to each locality tax or payments received that are funded by the locality tax;

- b. Number of providers in each locality of the taxing entities for each locality tax;
- c. Whether or not all providers in the locality will be paying the assessment for each locality tax;
- d. The assessment rate that the providers will be paying for each locality tax;
- e. Whether any providers that pay the assessment will not be receiving payments funded by the assessment;
- f. Number of providers that receive at least the total assessment back in the form of Medicaid payments for each locality tax;
- g. The monitoring plan for the taxing arrangement to ensure that the tax complies with section 1903(w)(4) of the Act and 42 CFR 433.68(f); and
- h. Information on whether the state will be reporting the assessment on the CMS form 64.11A as required under section 1903(w) of the Act.

10.8. **Extent of Federal Financial Participation for the Demonstration.** Subject to CMS approval of the source(s) of the non-federal share of funding, CMS will provide FFP at the applicable federal matching rate for the following demonstration expenditures, subject to the budget neutrality expenditure limits described in the STCs in section XI:

- a. Administrative costs, including those associated with the administration of the demonstration;
- b. Net expenditures and prior period adjustments of the Medicaid program that are paid in accordance with the approved Medicaid state plan; and
- c. Medical assistance expenditures and prior period adjustments made under section 1115 demonstration authority with dates of service during the demonstration extension period; including those made in conjunction with the demonstration, net of enrollment fees, cost sharing, pharmacy rebates, and all other types of third-party liability.

10.9. **Program Integrity.** The state must have processes in place to ensure there is no duplication of federal funding for any aspect of the demonstration. The state must also ensure that the state and any of its contractors follow standard program integrity principles and practices including retention of data. All data, financial reporting, and sources of non-federal share are subject to audit.

10.10. **Medicaid Expenditure Groups.** Medicaid Expenditure Groups (MEG) are defined for the purpose of identifying categories of Medicaid or demonstration expenditures subject to budget neutrality, components of budget neutrality expenditure limit calculations, and other purposes

related to monitoring and tracking expenditures under the demonstration. The Master MEG Chart table provides a master list of MEGs defined for this demonstration.

Table 2: Master MEG Chart					
MEG	Which BN Test Applies?	WOW Per Capita	WOW Aggregate	WW	Brief Description
Personal Care Services/ Physician Consultation	Hypo 1	X		X	All expenditures for providing additional services for individuals with behavioral health needs as described in Expenditure Authority #1
SUD IMD Services	Hypo 2	X		X	All expenditures for services provided to an individual while they are a patient in an IMD for SUD treatment described as described in Expenditure Authority #2
Caretaker Continuous Eligibility	Hypo 3	X		X	All expenditures for providing continuous eligibility for parents and other caretaker relatives as described in Expenditure Authority #3

10.11. **Reporting Expenditures and Member Months.** The state must report all demonstration expenditures claimed under the authority of title XIX of the Act and subject to budget neutrality each quarter on separate forms CMS-64.9 WAIVER and/or 64.9P WAIVER, identified by the demonstration project number assigned by CMS (11-W-00283/7). Separate reports must be submitted by MEG (identified by Waiver Name) and Demonstration Year (identified by the two-digit project number extension). Unless specified otherwise, expenditures must be reported by DY according to the dates of service associated with the expenditure. All MEGs identified in the Master MEG Chart as WW must be reported for expenditures, as further detailed in the MEG Detail for Expenditure and Member Month Reporting table below. To enable calculation of the budget neutrality expenditure limits, the state also must report member months of eligibility for specified MEGs.

- a. **Cost Settlements.** The state will report any cost settlements attributable to the demonstration on the appropriate prior period adjustment schedules (form CMS-64.9P WAIVER) for the summary sheet line 10b (in lieu of lines 9 or 10c), or line 7. For any cost settlement not attributable to this demonstration, the adjustments should be reported as otherwise instructed in the State Medicaid Manual. Cost settlements must be reported by DY consistent with how the original expenditures were reported.

- b. **Premiums and Cost Sharing Collected by the State.** The state will report any premium contributions collected by the state from demonstration enrollees quarterly on the form CMS-64 Summary Sheet line 9D, columns A and B. In order to assure that these collections are properly credited to the demonstration, quarterly premium collections (both total computable and federal share) should also be reported separately by demonstration year on form CMS-64 Narrative, and on the Total Adjustments tab in the Budget Neutrality Monitoring Tool. In the annual calculation of expenditures subject to the budget neutrality expenditure limit, premiums collected in the demonstration year will be offset against expenditures incurred in the demonstration year for determination of the state's compliance with the budget neutrality limits.
- c. **Pharmacy Rebates.** Because pharmacy rebates are not included in the base expenditures used to determine the budget neutrality expenditure limit, pharmacy rebates are not included for calculating net expenditures subject to budget neutrality. The state will report pharmacy rebates on form CMS-64.9 BASE, and not allocate them to any form 64.9 or 64.9P WAIVER.
- d. **Administrative Costs.** The state will separately track and report additional administrative costs that are directly attributable to the demonstration. All administrative costs must be identified on the forms CMS-64.10 WAIVER and/or 64.10P WAIVER. Unless indicated otherwise on the MEG Charts and in the STCs in section XI, administrative costs are not counted in the budget neutrality tests; however, these costs are subject to monitoring by CMS.
- e. **Member Months.** As part of the Quarterly and Annual Monitoring Reports described in section VIII, the state must report the actual number of “eligible member months” for all demonstration enrollees for all MEGs identified as WOW Per Capita in the Master MEG Chart table above, and as also indicated in the MEG Detail for Expenditure and Member Month Reporting table below. The term “eligible member months” refers to the number of months in which persons enrolled in the demonstration are eligible to receive services. For example, a person who is eligible for three months contributes three eligible member months to the total. Two individuals who are eligible for two months each contribute two eligible member months per person, for a total of four eligible member months. The state must submit a statement accompanying the annual report certifying the accuracy of this information.
- f. **Budget Neutrality Specifications Manual.** The state will create and maintain a Budget Neutrality Specifications Manual that describes in detail how the state will compile data on actual expenditures related to budget neutrality, including methods used to extract and compile data from the state’s Medicaid Management Information System, eligibility system, and accounting systems for reporting on the CMS-64, consistent with the terms of the demonstration. The Budget Neutrality Specifications Manual will also describe how the state compiles counts of Medicaid member months. The Budget Neutrality Specifications Manual must be made available to CMS on request.

Table 3: MEG Detail for Expenditure and Member Month Reporting

MEG (Waiver Name)	Detailed Description	Exclusions	CMS-64.9 or 64.10 Line(s) To Use	How Expend. Are Assigned to DY	MAP or ADM	Report Member Months (Y/N)	MEG Start Date	MEG End Date
Personal Care Services/ Physician Consultation	All expenditures for providing additional services for individuals with behavioral health needs as described in Expenditure Authority #1		Follow standard CMS-64.9 Category of Service Definitions	Date of service	MAP	Y	1/1/24	12/31/28
SUD IMD Services	All expenditures for services provided to an individual while they are a patient in an IMD for SUD treatment described as described in Expenditure Authority #2		Follow standard CMS-64.9 Category of Service Definitions	Date of service	MAP	Y	1/1/19	12/31/28
Caretaker Continuous Eligibility	All expenditures for providing continuous eligibility for parents and other caretaker relatives as described in Expenditure Authority #3		Follow standard CMS-64.9 Category of Service Definitions	Date of service	MAP	Y	9/29/22	12/31/28
ADM	All additional administrative costs that are directly attributable to the demonstration and not described elsewhere and are not subject to budget neutrality.		Follow standard CMS-64.10 Category of Service Definitions	Date of payment	ADM	N	1/1/19	12/31/28

10.12. **Demonstration Years.** Demonstration Years (DY) for this demonstration are defined in the table below.

Table 4: Demonstration Years		
Demonstration Year 12	January 1, 2024 to December 31, 2024	12 months
Demonstration Year 13	January 1, 2025 to December 31, 2025	12 months

Demonstration Year 14	January 1, 2026 to December 31, 2026	12 months
Demonstration Year 15	January 1, 2027 to December 31, 2027	12 months
Demonstration Year 16	January 1, 2028 to December 31, 2028	12 months

- 10.13. **Budget Neutrality Monitoring Tool.** The state must provide CMS with quarterly budget neutrality status updates, including established baseline and member months data, using the Budget Neutrality Monitoring Tool provided through the performance metrics database and analytics (PMDA) system. The tool incorporates the “Schedule C Report” for comparing the demonstration’s actual expenditures to the budget neutrality expenditure limits described in section XI. CMS will provide technical assistance, upon request.⁴
- 10.14. **Claiming Period.** The state will report all claims for expenditures subject to the budget neutrality agreement (including any cost settlements) within two years after the calendar quarter in which the state made the expenditures. All claims for services during the demonstration period (including any cost settlements) must be made within two years after the conclusion or termination of the demonstration. During the latter two-year period, the state will continue to identify separately net expenditures related to dates of service during the operation of the demonstration on the CMS-64 waiver forms in order to properly account for these expenditures in determining budget neutrality.
- 10.15. **Future Adjustments to Budget Neutrality.** CMS reserves the right to adjust the budget neutrality expenditure limit:
- a. To be consistent with enforcement of laws and policy statements, including regulations and guidance, regarding impermissible provider payments, health care related taxes, or other payments. CMS reserves the right to make adjustments to the budget neutrality limit if any health care related tax that was in effect during the base year, or provider-related donation that occurred during the base year, is determined by CMS to be in violation of the provider donation and health care related tax provisions of section 1903(w) of the Act. Adjustments to annual budget targets will reflect the phase out of impermissible provider payments by law or regulation, where applicable.
 - b. To the extent that a change in federal law, regulation, or policy requires either a reduction or an increase in FFP for expenditures made under this demonstration. In this circumstance, the state must adopt, subject to CMS approval, a modified budget

⁴ Per 42 CFR 431.420(a)(2), states must comply with the terms and conditions of the agreement between the Secretary (or designee) and the state to implement a demonstration project, and 431.420(b)(1) states that the terms and conditions will provide that the state will perform periodic reviews of the implementation of the demonstration. CMS’s current approach is to include language in STCs requiring, as a condition of demonstration approval, that states provide, as part of their periodic reviews, regular reports of the actual costs which are subject to the budget neutrality limit. CMS has obtained Office of Management and Budget (OMB) approval of the monitoring tool under the Paperwork Reduction Act (OMB Control No. 0938 – 1148) and states agree to use the tool as a condition of demonstration approval.

neutrality agreement as necessary to comply with such change. The modified agreement will be effective upon the implementation of the change. The trend rates for the budget neutrality agreement are not subject to change under this STC. The state agrees that if mandated changes in the federal law require state legislation, the changes shall take effect on the day such state legislation becomes effective, or on the last day such legislation was required to be in effect under the federal law.

The state certifies that the data it provided to establish the budget neutrality expenditure limit are accurate based on the state's accounting of recorded historical expenditures or the next best available data, that the data are allowable in accordance with applicable federal, state, and local statutes, regulations, and policies, and that the data are correct to the best of the state's knowledge and belief. The data supplied by the state to set the budget neutrality expenditure limit are subject to review and audit, and if found to be inaccurate, will result in a modified budget neutrality expenditure limit.

10.16. Budget Neutrality Mid-Course Correction Adjustment Request. No more than once per demonstration year, the state may request that CMS make an adjustment to its budget neutrality agreement based on changes to the state's Medicaid expenditures that are unrelated to the demonstration and/or outside the state's control, and/or that result from a new expenditure that is not a new demonstration-covered service or population and that is likely to further strengthen access to care.

- a. **Contents of Request and Process.** In its request, the state must provide a description of the expenditure changes that led to the request, together with applicable expenditure data demonstrating that due to these expenditures, the state's actual costs have exceeded the budget neutrality cost limits established at demonstration approval. The state must also submit the budget neutrality update described in STC 10.16.c. If approved, an adjustment could be applied retrospectively to when the state began incurring the relevant expenditures, if appropriate. Within 120 days of acknowledging receipt of the request, CMS will determine whether the state needs to submit an amendment pursuant to STC 3.7. CMS will evaluate each request based on its merit and will approve requests when the state establishes that an adjustment to its budget neutrality agreement is necessary due to changes to the state's Medicaid expenditures that are unrelated to the demonstration and/or outside of the state's control, and/or that result from a new expenditure that is not a new demonstration-covered service or population and that is likely to further strengthen access to care.
- b. **Types of Allowable Changes.** Adjustments will be made only for actual costs as reported in expenditure data. CMS will not approve mid-demonstration adjustments for anticipated factors not yet reflected in such expenditure data. Examples of the types of mid-course adjustments that CMS might approve include the following:
 - i. Provider rate increases that are anticipated to further strengthen access to care;
 - ii. CMS or State technical errors in the original budget neutrality formulation applied retrospectively, including, but not limited to the following:

mathematical errors, such as not aging data correctly; or unintended omission of certain applicable costs of services for individual MEGs;

- iii. Changes in federal statute or regulations, not directly associated with Medicaid, which impact expenditures;
- iv. State legislated or regulatory change to Medicaid that significantly affects the costs of medical assistance;
- v. When not already accounted for under Emergency Medicaid 1115 demonstrations, cost impacts from public health emergencies;
- vi. High-cost innovative medical treatments that states are required to cover; or,
- vii. Corrections to coverage/service estimates where there is no prior state experience (e.g., SUD) or small populations where expenditures may vary widely.

c. **Budget Neutrality Update.** The state must submit an updated budget neutrality analysis with its adjustment request, which includes the following elements:

- i. Projected without waiver and with waiver expenditures, estimated member months, and annual limits for each DY through the end of the approval period; and,
- ii. Description of the rationale for the mid-course correction, including an explanation of why the request is based on changes to the state's Medicaid expenditures that are unrelated to the demonstration and/or outside the state's control, and/or is due to a new expenditure that is not a new demonstration-covered service or population and that is likely to further strengthen access to care.

XI. MONITORING BUDGET NEUTRALITY FOR THE DEMONSTRATION

- 11.1. **Limit on Title XIX Funding.** The state will be subject to limits on the amount of federal Medicaid funding the state may receive over the course of the demonstration approval. The budget neutrality expenditure limits are based on projections of the amount of FFP that the state would likely have received in the absence of the demonstration. The limit consists of two Hypothetical Budget Neutrality Tests as described below. CMS’s assessment of the state’s compliance with these tests will be based on the Schedule C CMS-64 Waiver Expenditure Report, which summarizes the expenditures reported by the state on the CMS-64 that pertain to the demonstration.
- 11.2. **Risk.** The budget neutrality expenditure limits are determined on either a per capita or aggregate basis as described in Table 2, Master MEG Chart and Table 3, MEG Detail for Expenditure and Member Month Reporting. If a per capita method is used, the state is at risk for the per capita cost of state plan and hypothetical populations, but not for the number of participants in the demonstration population. By providing FFP without regard to enrollment in the demonstration for all demonstration populations, CMS will not place the state at risk for changing economic conditions, however, by placing the state at risk for the per capita costs of the demonstration populations, CMS assures that the demonstration expenditures do not exceed the levels that would have been realized had there been no demonstration. If an aggregate method is used, the state accepts risk for both enrollment and per capita costs.
- 11.3. **Calculation of the Budget Neutrality Limits and How They Are Applied.** To calculate the budget neutrality limits for the demonstration, separate annual budget limits are determined for each DY on a total computable basis. Each annual budget limit is the sum of one or more components: per capita components, which are calculated as a projected without-waiver PMPM cost times the corresponding actual number of member months, and aggregate components, which project fixed total computable dollar expenditure amounts. The annual limits for all DYs are then added together to obtain a budget neutrality limit for the entire demonstration period. The federal share of this limit will represent the maximum amount of FFP that the state may receive during the demonstration period for the types of demonstration expenditures described below. The federal share will be calculated by multiplying the total computable budget neutrality expenditure limit by the appropriate Composite Federal Share.
- 11.4. **Hypothetical Budget Neutrality.** When expenditure authority is provided for coverage of populations or services that the state could have otherwise provided through its Medicaid state plan or other title XIX authority (such as a waiver under section 1915 of the Act), or when a WOW spending baseline for certain WW expenditures is difficult to estimate due to variable and volatile cost data resulting in anomalous trend rates, CMS considers these expenditures to be “hypothetical,” such that the expenditures are treated as if the state could have received FFP for them absent the demonstration. For these hypothetical expenditures, CMS makes adjustments to the budget neutrality test which effectively treats these expenditures as if they were for approved Medicaid state plan services. Hypothetical expenditures, therefore, do not necessitate savings to offset the expenditures on those services. When evaluating budget neutrality, however, CMS does not offset non-hypothetical expenditures with projected or accrued savings from hypothetical expenditures; that is, savings are not generated from a hypothetical population or service. To allow for hypothetical expenditures, while preventing

them from resulting in savings, CMS currently applies separate, independent Hypothetical Budget Neutrality Tests, which subject hypothetical expenditures to pre-determined limits to which the state and CMS agree, and that CMS approves, as a part of this demonstration approval. If the state’s WW hypothetical spending exceeds the Hypothetical Budget Neutrality Test’s expenditure limit, the state agrees (as a condition of CMS approval) to offset that excess spending through savings elsewhere in the demonstration or to refund the FFP to CMS.

- 11.5. **Hypothetical Budget Neutrality Test 1: Personal Care Services/Physician Consultation (Expenditure Authority #1).** The table below identifies the MEGs that are used for Hypothetical Budget Neutrality Test 1. MEGs that are designated “WOW Only” or “Both” are the components used to calculate the budget neutrality expenditure limit. The Composite Federal Share for the Hypothetical Budget Neutrality Test is calculated based on all MEGs indicated as “WW Only” or “Both.” MEGs that are indicated as “WW Only” or “Both” are counted as expenditures against this budget neutrality expenditure limit. Any expenditures in excess of the limit from Hypothetical Budget Neutrality Test 1 are counted as WW expenditures under the Main Budget Neutrality Test.

Table 5: Hypothetical Budget Neutrality Test 1								
MEG	PC or Ag g	WOW Only, WW Only, or Both	Trend Rate	DY 12	DY 13	DY 14	DY 15	DY 16
Personal Care Services/ Physician Consultation	PC	Both	5.1%	\$1.46	\$1.53	\$1.61	\$1.69	\$1.78

- 11.6. **Hypothetical Budget Neutrality Test 1: SUD (Expenditure Authority #2).** The table below identifies the MEGs that are used for Hypothetical Budget Neutrality Test 2. MEGs that are designated “WOW Only” or “Both” are the components used to calculate the budget neutrality expenditure limit. The Composite Federal Share for the Hypothetical Budget Neutrality Test is calculated based on all MEGs indicated as “WW Only” or “Both.” MEGs that are indicated as “WW Only” or “Both” are counted as expenditures against this budget neutrality expenditure limit. Any expenditures in excess of the limit from Hypothetical Budget Neutrality Test 2 are counted as WW expenditures under the Main Budget Neutrality Test.

Table 6: Hypothetical Budget Neutrality Test 2								
MEG	PC or Agg	WOW Only, WW Only, or Both	Trend Rate	DY 12	DY 13	DY 14	DY 15	DY 16
SUD IMD Services	PC	Both	4.8%	\$1209.55	\$1267.61	\$1328.46	\$1392.23	\$1459.06

11.7. **Hypothetical Budget Neutrality Test 3: Continuous Eligibility (Expenditure Authority #3).** The table below identifies the MEGs that are used for Hypothetical Budget Neutrality Test 3. MEGs that are designated “WOW Only” or “Both” are the components used to calculate the budget neutrality expenditure limit. The Composite Federal Share for the Hypothetical Budget Neutrality Test is calculated based on all MEGs indicated as “WW Only” or “Both.” MEGs that are indicated as “WW Only” or “Both” are counted as expenditures against this budget neutrality expenditure limit. Any expenditures in excess of the limit from Hypothetical Budget Neutrality Test 3 are counted as WW expenditures under the Main Budget Neutrality Test.

Table 7: Hypothetical Budget Neutrality Test 3								
MEG	PC or Agg	WOW Only, WW Only, or Both	Trend Rate	DY 12	DY 13	DY 14	DY 15	DY 16
Caretaker Continuous Eligibility	PC	Both	4.8%	\$726.30	\$761.16	\$797.69	\$835.98	\$876.11

11.8. **Composite Federal Share.** The Composite Federal Share is the ratio that will be used to convert the total computable budget neutrality limit to federal share. The Composite Federal Share is the ratio calculated by dividing the sum total of FFP received by the state on actual demonstration expenditures during the approval period by total computable demonstration expenditures for the same period, as reported through MBES/CBES and summarized on Schedule C. Since the actual final Composite Federal Share will not be known until the end of the demonstration’s approval period, for the purpose of interim monitoring of budget neutrality, a reasonable estimate of Composite Federal Share may be developed and used through the same process or through an alternative mutually agreed to method. Each Budget Neutrality Test has its own Composite Federal Share, as defined in the paragraph pertaining to each particular test.

- 11.9. **Exceeding Budget Neutrality.** CMS will enforce the budget neutrality agreement over the demonstration period, which extends from 1/1/2024 to 12/31/2028. The Main Budget Neutrality Test for this demonstration period may incorporate carry-forward savings, that is, net savings from up to 10 years of the immediately prior demonstration approval period(s) (1/1/2013 to 12/31/2023). If at the end of the demonstration approval period the Main Budget Neutrality Test or a Capped Hypothetical Budget Neutrality Test has been exceeded, the excess federal funds will be returned to CMS. If the Demonstration is terminated prior to the end of the budget neutrality agreement, the budget neutrality test shall be based on the time elapsed through the termination date.
- 11.10. **Budget Neutrality Savings Cap.** The amount of savings available for use by the state during this demonstration period will be limited to the lower of these two amounts: 1) the savings amount the state has available in the current demonstration period, including carry-forward savings as described in STC 11.8, or 2) 15 percent of the state’s projected total Medicaid expenditures in aggregate for this demonstration period. This projection will be determined by taking the state’s total Medicaid spending amount in its most recent year with completed data and trending it forward by the President’s Budget trend rate for this demonstration period. Fifteen percent of the state’s total projected Medicaid expenditures for this demonstration period is \$688,400,929.
- 11.11. **Corrective Action Plan.** If at any time during the demonstration approval period CMS determines that the demonstration is on course to exceed its budget neutrality expenditure limit, CMS will require the state to submit a corrective action plan for CMS review and approval. CMS will use the threshold levels in the tables below as a guide for determining when corrective action is required.

Table 8: Budget Neutrality Test Corrective Action Plan Calculation		
Demonstration Year	Cumulative Target Definition	Percentage
DY 12	Cumulative budget neutrality limit plus:	2.0 percent
DY 12 through DY 13	Cumulative budget neutrality limit plus:	1.5 percent
DY 12 through DY 14	Cumulative budget neutrality limit plus:	1.0 percent
DY 12 through DY 15	Cumulative budget neutrality limit plus:	0.5 percent
DY 12 through DY 16	Cumulative budget neutrality limit plus:	0.0 percent

XII. SCHEDULE OF STATE DELIVERABLES FOR THE DEMONSTRATION APPROVAL PERIOD

The state is held to all reporting requirements as outlined in the STCs; this schedule of deliverables should serve only as a tool for informational purposes only.

Table 9. Schedule of Deliverables

Date - Specific	Deliverable	STC Reference
Within 120 days of expiration	Submit a Draft Close-Out Report	STC 8.10
Within 30 days of receipt of CMS comments	Submit Final Close-Out Report	STC 8.10
30 days after extension approval date	State acceptance of demonstration Waivers, STCs, and Expenditure Authorities	Approval letter
150 days after approval date	Monitoring Protocol	STC 8.6
180 days after approval date	Draft Evaluation Design	STC 9.3
60 days after receipt of CMS comments	Revised Draft Evaluation Design	STC 9.5
30 days after CMS Approval	Approved Evaluation Design published to state's website	STC 9.5
One year prior to the end of the demonstration, or with renewal application	Draft Interim Evaluation Report	STC 9.7
60 days after receipt of CMS comments	Revised Interim Evaluation Report	STC 9.7
18 months of the end of the demonstration	Draft Summative Evaluation Report	STC 9.8
60 calendar days after receipt of CMS comments	Revised Summative Evaluation Report	STC 9.8
90 days after middle of DY10	Draft SUD Mid-point Assessment	STC 8.8
60 calendar days after receipt of CMS comments	Revised SUD Mid-point assessment	STC 8.8

Date - Specific	Deliverable	STC Reference
30 calendar days of CMS approval	Approved Final Summative Evaluation Report published to state’s website	STC 9.8

Table 10. Schedule of Annual/Quarterly Deliverables

	Deliverable	STC Reference
Annually	Annual Monitoring Report	STC 8.7
Quarterly	Quarterly Monitoring Report	STC 8.7
	Budget Neutrality Report	STC 10.13

ATTACHMENT A

Developing the Evaluation Design

Introduction

For states that are testing new approaches and flexibilities in their Medicaid programs through section 1115 demonstrations, evaluations are crucial to understand and disseminate what is or is not working and why. The evaluations of new initiatives seek to produce new knowledge and direction for programs and inform Medicaid policy for the future. While a narrative about what happened during a demonstration provides important information, the principal focus of the evaluation of a section 1115 demonstration should be obtaining and analyzing data on the process (e.g., whether the demonstration is being implemented as intended), outcomes (e.g., whether the demonstration is having the intended effects on the target population), and impacts of the demonstration (e.g., whether the outcomes observed in the targeted population differ from outcomes in similar populations not affected by the demonstration). Both state and federal governments need rigorous quantitative and qualitative evidence to inform policy decisions.

The evaluation design is the state's plan for how it will accomplish the evaluation. In most cases, states must arrange with an independent evaluator to conduct the evaluation. The state, per the Special Terms and Conditions (STC), is required to submit an evaluation design to CMS for CMS approval after the demonstration is approved. The evaluation design needs to specify the state's hypotheses, evaluation questions, associated measures and analytic methods. To support the development of the evaluation design in accordance with CMS priorities and expectations, CMS is providing the following outline for the evaluation design. It is recommended that states and independent evaluators use this outline to develop the evaluation design for submission to CMS.

The sections in this outline include background, evaluation questions and hypotheses, methodology, methodological limitations, and attachments. It is important to include as much detail as possible when completing this outline, to provide CMS with the best information with which to review the evaluation design.

CMS expects evaluation designs to be rigorous, incorporate baseline and comparison group assessments, as well as statistical significance testing. If the state needs technical assistance using this outline or developing the evaluation design, the state should contact its project officer.

Developing the Evaluation Design Recommended Outline

Expectations for Evaluation Designs

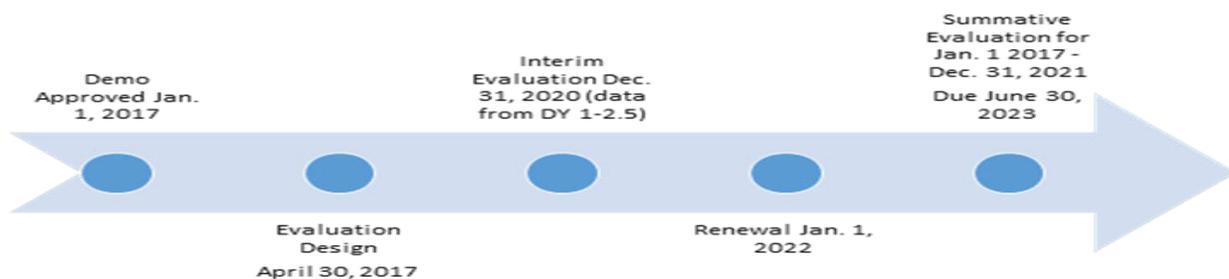
All states with Medicaid section 1115 demonstrations are required to conduct an evaluation, and the Evaluation Design is the roadmap for conducting the evaluation. The roadmap begins with the stated goals for the demonstration followed by the measurable evaluation questions and quantifiable hypotheses, all to support a determination of the extent to which the demonstration has achieved its goals. When conducting analyses and developing the evaluation reports, every effort should be made to follow the approved methodology. However, the state may request, and CMS may agree to, changes in the methodology in appropriate circumstances.

The format for the Evaluation Design is as follows:

- A. General Background Information;
- B. Evaluation Questions and Hypotheses;
- C. Methodology;
- D. Methodological Limitations;
- E. Attachments.

Submission Timelines

There is a specified timeline for the state's submission of Evaluation Design and Reports. (The graphic below depicts an example of this timeline). In addition, the state should be aware that section 1115 evaluation documents are public records. The state is required to publish the Evaluation Design to the state's website within 30 days of CMS approval, as per 42 CFR 431.424(e). CMS will also publish a copy to the Medicaid.gov website.



Required Core Components of All Evaluation Designs

The Evaluation Design sets the stage for the Interim and Summative Evaluation Reports. It is important that the Evaluation Design explain the goals and objectives of the demonstration, the hypotheses related to the demonstration, and the methodology (and limitations) for the evaluation. A copy of the state's Driver Diagram (described in more detail in paragraph B2 below) should be included with an explanation of the depicted information.

A. General Background Information – In this section, the state should include basic information about the demonstration, such as:

- 1) The issue/s that the state is trying to address with its section 1115 demonstration and/or expenditure authorities, the potential magnitude of the issue/s, and why the state selected this course of action to address the issue/s (e.g., a narrative on why the state submitted an 1115 demonstration proposal).
- 2) The name of the demonstration, approval date of the demonstration, and period of time covered by the evaluation;
- 3) A brief description of the demonstration and history of the implementation, and whether the draft Evaluation Design applies to an amendment, extension, renewal, or expansion of, the demonstration;
- 4) For renewals, amendments, and major operational changes: A description of any changes to the demonstration during the approval period; the primary reason or reasons for the change; and how the Evaluation Design was altered or augmented to address these changes.
- 5) Describe the population groups impacted by the demonstration.

B. Evaluation Questions and Hypotheses – In this section, the state should:

- 1) Describe how the state’s demonstration goals are translated into quantifiable targets for improvement, so that the performance of the demonstration in achieving these targets could be measured.
- 2) Include a Driver Diagram to visually aid readers in understanding the rationale behind the cause and effect of the variants behind the demonstration features and intended outcomes. A driver diagram is a particularly effective modeling tool when working to improve health and health care through specific interventions. The diagram includes information about the goal of the demonstration, and the features of the demonstration. A driver diagram depicts the relationship between the aim, the primary drivers that contribute directly to achieving the aim, and the secondary drivers that are necessary to achieve the primary drivers for the demonstration. For an example and more information on driver diagrams:
<https://innovation.cms.gov/files/x/hciatwoaimsdrvrs.pdf>
- 3) Identify the state’s hypotheses about the outcomes of the demonstration:
 - a. Discuss how the evaluation questions align with the hypotheses and the goals of the demonstration;
 - b. Address how the research questions / hypotheses of this demonstration promote the objectives of Titles XIX and/or XXI.

C. Methodology – In this section, the state is to describe in detail the proposed research methodology. The focus is on showing that the evaluation meets the prevailing standards of scientific and academic rigor, and the results are statistically valid and reliable, and that where appropriate it builds upon other published research (use references).

This section provides the evidence that the demonstration evaluation will use the best available data; reports on, controls for, and makes appropriate adjustments for the limitations of the data and their effects on results; and discusses the generalizability of results. This section should provide enough transparency to explain what will be measured and how. Specifically, this section establishes:

- 1) *Evaluation Design* – Provide information on how the evaluation will be designed. For example, will the evaluation utilize a pre/post comparison? A post-only assessment? Will a comparison group be included?
- 2) *Target and Comparison Populations* – Describe the characteristics of the target and comparison populations, to include the inclusion and exclusion criteria. Include information about the level of analysis (beneficiary, provider, or program level), and if populations will be stratified into subgroups. Additionally discuss the sampling methodology for the populations, as well as support that a statistically reliable sample size is available.
- 3) *Evaluation Period* – Describe the time periods for which data will be included.
- 4) *Evaluation Measures* – List all measures that will be calculated to evaluate the demonstration. Include the measure stewards (i.e., the organization(s) responsible for the evaluation data elements/sets by “owning”, defining, validating; securing; and submitting for endorsement, etc.) Include numerator and denominator information. Additional items to ensure:
 - a. The measures contain assessments of both process and outcomes to evaluate the effects of the demonstration during the period of approval.
 - b. Qualitative analysis methods may be used, and must be described in detail.
 - c. Benchmarking and comparisons to national and state standards, should be used, where appropriate.
 - d. Proposed health measures could include CMS’s Core Set of Health Care Quality Measures for Children in Medicaid and CHIP, Consumer Assessment of Health Care Providers and Systems (CAHPS), the Initial Core Set of Health Care Quality Measures for Medicaid-Eligible Adults and/or measures endorsed by National Quality Forum (NQF).
 - e. Proposed performance metrics can be selected from nationally recognized metrics, for example from sets developed by the Center for Medicare and Medicaid Innovation or for meaningful use under Health Information Technology (HIT).
 - f. Among considerations in selecting the metrics shall be opportunities identified by the state for improving quality of care and health outcomes, and controlling cost of care.

- 5) *Data Sources* – Explain where the data will be obtained, and efforts to validate and clean the data. Discuss the quality and limitations of the data sources.

If primary data (data collected specifically for the evaluation) – The methods by which the data will be collected, the source of the proposed question/responses, the frequency and timing of data collection, and the method of data collection. (Copies of any proposed surveys must be reviewed with CMS for approval before implementation).

- 6) *Analytic Methods* – This section includes the details of the selected quantitative and/or qualitative measures to adequately assess the effectiveness of the demonstration. This section should:
 - a. Identify the specific statistical testing which will be undertaken for each measure (e.g., t-tests, chi-square, odds ratio, ANOVA, regression). Table A is an example of how the state might want to articulate the analytic methods for each research question and measure.
 - b. Explain how the state will isolate the effects of the demonstration (from other initiatives occurring in the state at the same time) through the use of comparison groups.
 - c. A discussion of how propensity score matching and difference in differences design may be used to adjust for differences in comparison populations over time (if applicable).
 - d. The application of sensitivity analyses, as appropriate, should be considered.
- 7) *Other Additions* – The state may provide any other information pertinent to the Evaluation Design of the demonstration.

D. Methodological Limitations – This section provides detailed information on the limitations of the evaluation. This could include the design, the data sources or collection process, or analytic methods. The state should also identify any efforts to minimize the limitations. Additionally, this section should include any information about features of the demonstration that effectively present methodological constraints that the state would like CMS to take into consideration in its review.

E. Special Methodological Considerations- CMS recognizes that there may be certain instances where a state cannot meet the rigor of an evaluation as expected by CMS. In these instances, the state should document for CMS why it is not able to incorporate key components of a rigorous evaluation, including comparison groups and baseline data analyses. Examples of considerations include:

- 1) When the state demonstration is:
 - a. Long-standing, non-complex, unchanged, or
 - b. Has previously been rigorously evaluated and found to be successful, or
 - c. Could now be considered standard Medicaid policy (CMS published regulations or guidance)

- 2) When the demonstration is also considered successful without issues or concerns that would require more regular reporting, such as:
 - a. Operating smoothly without administrative changes; and
 - b. No or minimal appeals and grievances; and
 - c. No state issues with CMS 64 reporting or budget neutrality; and
 - d. No Corrective Action Plans (CAP) for the demonstration.

Table A. Example Design Table for the Evaluation of the Demonstration

Research Question	Outcome measures used to address the research question	Sample or population subgroups to be compared	Data Sources	Analytic Methods
Hypothesis 1				
Research question 1a	-Measure 1 -Measure 2 -Measure 3	-Sample e.g. All attributed Medicaid beneficiaries -Beneficiaries with diabetes diagnosis	-Medicaid fee-for-service and encounter claims records	-Interrupted time series
Research question 1b	-Measure 1 -Measure 2 -Measure 3 -Measure 4	-sample, e.g., PPS patients who meet survey selection requirements (used services within the last 6 months)	-Patient survey	Descriptive statistics
Hypothesis 2				
Research question 2a	-Measure 1 -Measure 2	-Sample, e.g., PPS administrators	-Key informants	Qualitative analysis of interview material

F. Attachments

- 1) **Independent Evaluator.** This includes a discussion of the state’s process for obtaining an independent entity to conduct the evaluation, including a description of the qualifications that the selected entity must possess, and how the state will assure no conflict of interest. Explain how the state will assure that the Independent Evaluator will conduct a fair and impartial evaluation, prepare an objective Evaluation Report, and that there would be no conflict of interest. The evaluation design should include “No Conflict of Interest” signed by the independent evaluator.
- 2) **Evaluation Budget.** A budget for implementing the evaluation shall be provided with the draft Evaluation Design. It will include the total estimated cost, as well as a breakdown of estimated staff, administrative, and other costs for all aspects of the evaluation. Examples include, but are not limited to: the development of all survey and measurement instruments; quantitative and qualitative data collection; data cleaning and analyses; and reports generation. A justification of the costs may be

required by CMS if the estimates provided do not appear to sufficiently cover the costs of the draft Evaluation Design or if CMS finds that the draft Evaluation Design is not sufficiently developed.

- 3) Timeline and Major Milestones.** Describe the timeline for conducting the various evaluation activities, including dates for evaluation-related milestones, including those related to procurement of an outside contractor, if applicable, and deliverables. The Final Evaluation Design shall incorporate an Interim and Summative Evaluation. Pursuant to 42 CFR 431.424(c)(v), this timeline should also include the date by which the Final Summative Evaluation report is due.

ATTACHMENT B

Preparing the Evaluation Report

Introduction

For states that are testing new approaches and flexibilities in their Medicaid programs through section 1115 demonstrations, evaluations are crucial to understand and disseminate what is or is not working and why. The evaluations of new initiatives seek to produce new knowledge and direction for programs and inform Medicaid policy for the future. While a narrative about what happened during a demonstration provides important information, the principal focus of the evaluation of a section 1115 demonstration should be obtaining and analyzing data on the process (e.g., whether the demonstration is being implemented as intended), outcomes (e.g., whether the demonstration is having the intended effects on the target population), and impacts of the demonstration (e.g., whether the outcomes observed in the targeted population differ from outcomes in similar populations not affected by the demonstration). Both state and federal governments need rigorous quantitative and qualitative evidence to inform policy decisions.

The evaluation report provides the analysis and summary of the hypotheses tested in the evaluation. The hypotheses, evaluation questions, and measures should align with those identified in the CMS approved evaluation design. The state, per the Special Terms and Conditions (STC), is required to submit to CMS an interim evaluation report and a summative evaluation report. To support the development of the interim and summative evaluation reports, CMS is providing the following outline for the evaluation reports. It is recommended that states and independent evaluators use this outline to develop the evaluation reports for submission to CMS.

The sections in this outline include an executive summary, background information, evaluation questions and hypotheses, methodology, methodological limitations, results, conclusions, interpretations, lessons learned and recommendations, and attachments. It is important to provide as much detail as possible when completing this outline, to provide CMS with the best information with which to review the evaluation reports.

If the state needs technical assistance using this outline or preparing the evaluation reports, the state should contact its project officer.

Preparing the Evaluation Report Recommended Outline

Expectations for Evaluation Reports

Medicaid section 1115 demonstrations are required to conduct an evaluation that is valid (the extent to which the evaluation measures what it is intended to measure), and reliable (the extent to which the evaluation could produce the same results when used repeatedly). To this end, the already approved Evaluation Design is a map that begins with the demonstration goals, then transitions to the evaluation questions, and to the specific hypotheses, which will be used to investigate whether the demonstration has achieved its goals. States should have a well-structured analysis plan for their evaluation. With the following kind of information, states and CMS are best poised to inform and shape Medicaid policy in order to improve the health and welfare of Medicaid beneficiaries for decades to come. When conducting analyses and developing the evaluation reports, every effort should be made to follow the approved methodology. However, the state may request, and CMS may agree to, changes in the methodology in appropriate circumstances. When submitting an application for renewal, the interim evaluation report should be posted on the state's website with the application for public comment. Additionally, the interim evaluation report must be included in its entirety with the application submitted to CMS.

Intent of this Attachment

Title XIX of the Social Security Act (the Act) requires an evaluation of every section 1115 demonstration. In order to fulfill this requirement, the state's submission must provide a comprehensive written presentation of all key components of the demonstration, and include all required elements specified in the approved Evaluation Design. This Attachment is intended to assist states with organizing the required information in a standardized format and understanding the criteria that CMS will use in reviewing the submitted Interim and Summative Evaluation Reports.

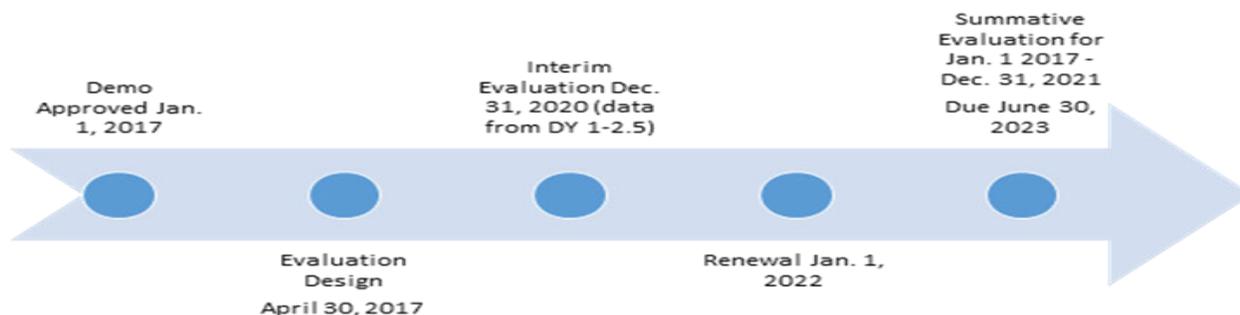
The format for the Interim and Summative Evaluation reports are as follows:

- A. Executive Summary;
- B. General Background Information;
- C. Evaluation Questions and Hypotheses;
- D. Methodology;
- E. Methodological Limitations;
- F. Results;
- G. Conclusions;
- H. Interpretations, and Policy Implications and Interactions with Other State Initiatives;
- I. Lessons Learned and Recommendations; and
- J. Attachment(s).

Submission Timelines

There is a specified timeline for the state's submission of Evaluation Designs and Evaluation Reports. These dates are specified in the demonstration Special Terms and Conditions (STCs). (The graphic below depicts an example of this timeline). In addition, the state should be aware that section 1115 evaluation documents are public records. In order to assure the dissemination

of the evaluation findings, lessons learned, and recommendations, the state is required to publish the evaluation design and reports to the state’s website within 30 days of CMS approval, as per 42 CFR 431.424(d). CMS will also publish a copy to the Medicaid.gov website.



Required Core Components of Interim and Summative Evaluation Reports

The section 1115 Evaluation Report presents the research about the section 1115 Demonstration. It is important that the report incorporate a discussion about the structure of the Evaluation Design to explain the goals and objectives of the demonstration, the hypotheses related to the demonstration, and the methodology for the evaluation. A copy of the state’s Driver Diagram (described in the Evaluation Design Attachment) must be included with an explanation of the depicted information. The Evaluation Report should present the relevant data and an interpretation of the findings; assess the outcomes (what worked and what did not work); explain the limitations of the design, data, and analyses; offer recommendations regarding what (in hindsight) the state would further advance, or do differently, and why; and discuss the implications on future Medicaid policy. Therefore, the state’s submission must include:

- A. Executive Summary** – A summary of the demonstration, the principal results, interpretations, and recommendations of the evaluation.
- B. General Background Information about the Demonstration** – In this section, the state should include basic information about the demonstration, such as:
 - 1) The issues that the state is trying to address with its section 1115 demonstration and/or expenditure authorities, how the state became aware of the issue, the potential magnitude of the issue, and why the state selected this course of action to address the issues.
 - 2) The name of the demonstration, approval date of the demonstration, and period of time covered by the evaluation;
 - 3) A brief description of the demonstration and history of the implementation, and if the evaluation is for an amendment, extension, renewal, or expansion of, the demonstration;
 - 4) For renewals, amendments, and major operational changes: A description of any changes to the demonstration during the approval period; whether the motivation for change was due to political, economic, and fiscal factors at the state and/or federal

- level; whether the programmatic changes were implemented to improve beneficiary health, provider/health plan performance, or administrative efficiency; and how the Evaluation Design was altered or augmented to address these changes.
- 5) Describe the population groups impacted by the demonstration.

C. Evaluation Questions and Hypotheses – In this section, the state should:

- 1) Describe how the state’s demonstration goals were translated into quantifiable targets for improvement, so that the performance of the demonstration in achieving these targets could be measured. The inclusion of a Driver Diagram in the Evaluation Report is highly encouraged, as the visual can aid readers in understanding the rationale behind the demonstration features and intended outcomes.
- 2) Identify the state’s hypotheses about the outcomes of the demonstration;
 - a. Discuss how the goals of the demonstration align with the evaluation questions and hypotheses;
 - b. Explain how this Evaluation Report builds upon and expands earlier demonstration evaluation findings (if applicable); and
 - c. Address how the research questions / hypotheses of this demonstration promote the objectives of Titles XIX and XXI.

D. Methodology – In this section, the state is to provide an overview of the research that was conducted to evaluate the section 1115 demonstration consistent with the approved Evaluation Design. The evaluation Design should also be included as an attachment to the report. The focus is on showing that the evaluation builds upon other published research (use references), and meets the prevailing standards of scientific and academic rigor, and the results are statistically valid and reliable.

An interim report should provide any available data to date, including both quantitative and qualitative assessments. The Evaluation Design should assure there is appropriate data development and collection in a timely manner to support developing an interim evaluation.

This section provides the evidence that the demonstration evaluation used the best available data and describes why potential alternative data sources were not used; reported on, controlled for, and made appropriate adjustments for the limitations of the data and their effects on results; and discusses the generalizability of results. This section should provide enough transparency to explain what was measured and how. Specifically, this section establishes that the approved Evaluation Design was followed by describing:

- 1) *Evaluation Design*—Will the evaluation be an assessment of: pre/post, post-only, with or without comparison groups, etc?
- 2) *Target and Comparison Populations*—Describe the target and comparison populations; include inclusion and exclusion criteria.
- 3) *Evaluation Period*—Describe the time periods for which data will be collected
- 4) *Evaluation Measures*—What measures are used to evaluate the demonstration, and who are the measure stewards?

- 5) *Data Sources*—Explain where the data will be obtained, and efforts to validate and clean the data.
- 6) *Analytic methods*—Identify specific statistical testing which will be undertaken for each measure (t-tests, chi-square, odds ratio, ANOVA, regression, etc.).
- 7) *Other Additions* – The state may provide any other information pertinent to the evaluation of the demonstration.

E. Methodological Limitations

This section provides sufficient information for discerning the strengths and weaknesses of the study design, data sources/collection, and analyses.

F. Results – In this section, the state presents and uses the quantitative and qualitative data to show to whether and to what degree the evaluation questions and hypotheses of the demonstration were achieved. The findings should visually depict the demonstration results (tables, charts, graphs). This section should include information on the statistical tests conducted.

G. Conclusions – In this section, the state will present the conclusions about the evaluation results.

- 1) In general, did the results show that the demonstration was/was not effective in achieving the goals and objectives established at the beginning of the demonstration?
- 2) Based on the findings, discuss the outcomes and impacts of the demonstration and identify the opportunities for improvements. Specifically:
 - a. If the state did not fully achieve its intended goals, why not? What could be done in the future that would better enable such an effort to more fully achieve those purposes, aims, objectives, and goals?

H. Interpretations, Policy Implications and Interactions with Other State Initiatives – In this section, the state will discuss the section 1115 demonstration within an overall Medicaid context and long range planning. This should include interrelations of the demonstration with other aspects of the state’s Medicaid program, interactions with other Medicaid demonstrations, and other federal awards affecting service delivery, health outcomes and the cost of care under Medicaid. This section provides the state with an opportunity to provide interpretation of the data using evaluative reasoning to make judgments about the demonstration. This section should also include a discussion of the implications of the findings at both the state and national levels.

I. Lessons Learned and Recommendations – This section of the Evaluation Report involves the transfer of knowledge. Specifically, the “opportunities” for future or revised demonstrations to inform Medicaid policymakers, advocates, and stakeholders is just as significant as identifying current successful strategies. Based on the evaluation results:

- 1) What lessons were learned as a result of the demonstration?
- 2) What would you recommend to other states which may be interested in implementing a similar approach?

J. Attachment

- 1) Evaluation Design: Provide the CMS-approved Evaluation Design

Attachment C
SUD Implementation Plan and Financing Plan

Section 1115 Substance Use Disorder (SUD) Demonstration: Implementation Plan

Introduction:

Although Kansas is still below the national average rate for drug overdose mortality, Opioid overdose deaths in Kansas have risen significantly in recent years, and the State is acting strategically to address the crisis as reported in the Kansas State Opioid Response Grant to Substance Abuse and Mental Health Services Administration (SAMSHA) (TI-18-015. P. 1) based on Kansas vital statistics data for age adjusted drug poisoning mortality rates, 2012-2016. Based on this vital statistics data, some key facts include:

- The age adjusted drug poisoning mortality rate was 10.9 deaths per 100,000 Kansans.
- From 2012 to 2016, there were a total of 1,583 drug poisoning deaths in Kansas. From 1999 to 2014, drug poisoning death rates have tripled-placing deaths from poisoning the leading cause of injury related deaths in Kansas.
- Drugs, including prescription, over the counter and illicit drugs, account for more than 80% of all poisoning deaths.
- Seventy-five percent of the drug poisoning deaths in 2014 were unintentional, 17% were due to suicide and 7% were of an undetermined intent.
- Kansans aged 45 years old had the highest rate of drug poisoning deaths involved a prescription pain reliever such as hydrocodone or oxycodone.
- Almost 85% (84.3%) of those deaths involved either a pharmaceutical opioid (e.g., Oxycodone, Hydrocodone), a Methamphetamine/Amphetamine drug (e.g., illicit meth or Adderall), or a Benzodiazepine (e.g. Xanax, Valium). It is of note that, individuals born between 1955 and 1970 experienced a disproportionately higher drug poisoning mortality rate as compared to younger generations.

In addition to prescription opioid death, Kansas has also seen an increase in heroin related and synthetic opioid deaths since 2010. Specifically:

- In 2014, there were 56 drug deaths involving either heroin or a synthetic opioid, such as fentanyl, (age adjusted rate 2.0 deaths per 1000,000 population) representing about 34% of all drug deaths involving an opioid—a 200% increase since 2010 (age adjusted rate: 1.1 deaths per 100,000 population). These rates are likely under estimates of the drug deaths caused by narcotic agents since there are a number of drug deaths where the deaths do not mention a drug specifically.
- Along with an increase in heroin and synthetic opioid deaths is an estimated increase in the number of Kansans 26 years and older who have misused a prescription opioid pain reliever in the past year from 2010 (3.26% to 2014(3.49%).

This Substance Use Disorders (SUD) Demonstration Implementation Plan outlines the State's strategy to provide a full continuum of services for SUD treatment to KanCare members. This waiver request is consistent with Kansas' current strategy to combat the epidemic and builds off

its system of care in Medicaid to provide more complete services, particularly in areas of limited coverage and service gaps such as higher levels of care. The KanCare Section 1115 Waiver Demonstration Renewal Application, submitted to Center for Medicare and Medicaid Services (CMS) on December 20, 2017 (*Attachment #1, KanCare 2.0 Section 1115 Waiver Demonstration Renewal Application, Final Submission, Dec 2017, page 25*) includes this waiver request.

Kansas' SUD Crisis

National studies suggest that patients with a higher dose of opioids, multiple prescribers and several pharmacies are more likely to die from an opioid overdose.¹ Experts have attributed the rise in opioid use disorders (OUD) and the overdose crisis to the increased rate of prescription opioids dispensed since the 1990s.² According to the Centers for Disease Control (CDC), the number of prescription opioids dispensed in the U.S. has nearly quadrupled in the past decade. Concurrently, the rate of opioid-related deaths has more than doubled in the United States since 2005. Opioid overdoses accounted for a considerable number of Kansas's drug poisoning deaths from 2012 to 2016. Though the rate of overdose deaths in Kansas remains below the national average, 2016 Kansas vital statistics data indicates that the age-adjusted drug poisoning mortality rate was 10.9 deaths per 100,000 Kansans. From 2012 to 2016, there were a total of 1,583 drug poisoning deaths in Kansas. Almost eighty-five percent (84.3%) of those deaths involved either a pharmaceutical opioid (e.g., Oxycodone, Hydrocodone), a Methamphetamine/Amphetamine drug (e.g., illicit meth or Adderall), or a Benzodiazepine (e.g. Xanax, Valium).

An important factor associated with the increase in drug poisoning deaths in Kansas is the supply of prescription opioids. Kansas's Prescription Drug Monitoring Program, K-TRACS, tracks and monitors Schedule II through IV controlled substances, such as prescription opioids, and other drugs of concern dispensed in Kansas. K-TRACS provides public health and public safety professionals with dispensation data of these drugs statewide. In 2017, there were at least 2,579,058 opioid prescriptions and 189,525,054 opioid units (i.e., pills, patches, films, or vials) dispensed to Kansas patients. This corresponds to a rate of 88.5 prescriptions per 100 Kansans and 65.1 opioid units per Kansan. This is equivalent to dispensing an approximate 14-day supply of an opioid prescription to 8 out of 10 Kansas residents in 2017. Experts estimate that about 100,000 Kansans, or 3 out of every 10, have misused prescription pain medication in a way other than as directed by a doctor or more than the prescribed amount. There was an approximate 9 percent decrease in opioid dispensing statewide from 2016 to 2017 in Kansas, or approximately 249,942 fewer opioid prescriptions. This reduction is consistent with national trends. However, the use of opioids among young adults is a major concern. The Kansas Communities that Care Student Survey (KCTC) assesses prescription drug misuse among Kansas youth in addition to other health risk and protective factors. According to 2017 KCTC data, 3.7 percent of Kansas youth in grades 6, 8, 10 and 12 report using prescription medications not prescribed to them. Of those, more than 75 percent reported that they received, bought or stole them from a friend or relative. The Kansas

¹ CDC Wonder Online Database, released December 2016. Sourced from: https://www.kmap-state-ks.us/Documents/Content/Bulletins/18027%20-%20General%20-%20Opioid_2.pdf.

² National Institute on Drug Abuse, revised January 2019. Available at: <https://www.drugabuse.gov/drugs-abuse/opioids/opioid-overdose-crisis>.

Young Adult Survey also measures prescription and illicit drug use among Kansas young adults ages 18 to 25. In 2017, 6.8 percent of young adults reported using prescription pain medication at least once in the past 30 days, 40 percent did not have a prescription for it. Of the people that report the misuse of prescription pain medications, more than 91 percent reported that they received, purchased or stole them from a friend or relative.

Kansas' Strategic Response to the Opioid Overdose Crisis

Kansas Department for Aging and Disability Services (KDADS) serves as both the State Mental Health Authority (SMHA) and Single State Agency (SSA) for Substance Abuse in Kansas. The Strategic Opioid Response set forth by the SSA with SAMSHA in the State Opioid Response Grant (SOR TI-18-015) will utilize a statewide strategic plan developed through a multidisciplinary statewide process. The strategic plan builds upon existing opioid efforts and tools to combat the opioid epidemic, including the SAMHSA funded State Targeted Response to the Opioid Crisis (STR) Grant, focused on OUD treatment, prevention, and recovery. Kansas was also a recipient of a Partnership For Success 2015 Grant to strategically address prescription drug misuse and abuse in four sites across the State. The Kansas Department of Health and Environment (KDHE) was the recipient of Prescription Drug Overdose (PDO): Data-Driven Prevention Initiative (DDPI) Grant from the Centers for Disease Control (CDC). The Kansas Foundation for Medical Care (KFMC) is the recipient of funds from CMS to coordinate a pain management project at multiple locations across the State. The Statewide Prescription Drug Workgroup serves as a means of coordination and collaboration for these multiple initiatives and will continue to function in this capacity for the SOR grant as well. As part of these federally funded efforts, Kansas will expand access to medication-assisted treatment (MAT) by using a regional approach. The State will require regional grantees to promote primary care provider enrollment in buprenorphine or buprenorphine/ naloxone combination medication prescribing accompanied by education on evidence-based best practices for prescribing opioids and the importance of behavioral health treatment with MAT. The Opioid SOR Grant Access to Care Project Coordinator in each region will be responsible for the development and expansion of MAT services in partnership with clinics, providers, and hospitals. Regional grantees will identify gaps in care specific to their regions and populations with strategies to address these gaps.

In September 2018, the Governor's Task Force on Substance Abuse set strategic priorities to combat the opioid epidemic. These strategies include expanding access to treatment and recovery support, as well as increasing the use of data and health information technology, particularly in reducing opioid prescribing and opioid dependence. These strategies are consistent with this SUD Demonstration request.

The Current Delivery System

KanCare currently integrates medical, behavioral, and long-term care health delivery systems and covers mandatory and optional services under the approved Medicaid State Plan. KanCare provides access to all critical levels of care for opioid use disorder (OUD) and SUD. KanCare contracts with three MCOs statewide to provide access to the American Society of Addiction Medicine (ASAM) levels. The KanCare criteria for treatment is a fidelity-based adaptation of the ASAM Patient Placement Criteria. The Kansas Department for Aging and Disability

Services (KDADS) provide required licenses to KanCare-enrolled SUD treatment providers. Currently State law also requires licenses for any provider who delivers SUD treatment services in a facility setting.

KanCare delivers the outpatient benefits described below pursuant to the service requirements in the Kansas Medicaid State Plan - Attachment 3.1-A, 13.d. The State Plan requires the provision of inpatient and detoxification (withdrawal management) services in State certified facilities. The Kansas Medical Assistance Program Substance Use Disorder Services Provider Manual (KMAP-SUD-PM) details eligibility and service requirements for all KanCare OUD and SUD services by ASAM level. The Manual (*Attachment #2, KMAP-SUD-PM*) provides eligible Medicaid recipients who need SUD or OUD treatment with the full spectrum of care, including outpatient treatment, peer recovery support, intensive outpatient services, medication assisted treatment (MAT), intensive inpatient services, withdrawal management, and residential treatment. MCO network providers include specialty providers such as Women's Treatment Centers for woman and children, which offers prenatal services and services to meet the developmental needs of children. KanCare requires the provision of Person-Centered Case Management as a one-on-one goal-directed service for individuals with a SUD, to assist individuals in obtaining access to needed family, legal, medical, employment, educational, psychiatric, and other services. For individuals served by an MCO, this service must be a part of the treatment plan developed and determined medically necessary by the MCO.

Access to treatment varies by region; western Kansas, a rural, frontier area has very little access to opioid use disorder treatment, including MAT (methadone clinics and buprenorphine prescribers). There are currently nine Methadone Maintenance Treatment clinics in Kansas located primarily in the largest urban areas of the State. These clinics provide non-residential services of long-term methadone maintenance and other medication assistance to support and sustain recovery. Most patients who access these services pay out of pocket for methadone maintenance treatment. Since KanCare does not pay for methadone as a MAT (it covers methadone only for use in pain management), there is currently only one methadone dispensing provider who is in the KanCare network. KanCare will revisit the issue of covering methadone for MAT and make a recommendation of policy within the first half of 2019. This policy will consider the requirement that all inpatient residential treatment centers (including all those currently excluded as IMDs) provide access to MAT through direct provision of the KanCare approved MAT formularies or by coordinated referral and treatment initiation to a KanCare MAT provider.

SUD Demonstration Goals

Kansas will use this 1115 demonstration authority to pursue the following goals:

1. *Increased rates of identification, initiation, and engagement in treatment for OUD and other SUDs*: Kansas receives federal funds through SAMSHA, including State Opioid Response and Strategic Targeted Response grants, to run awareness campaigns on the availability of treatment. Kansas continues to support expanding screening, brief intervention, and referral to treatment (SBIRT) as a SUD mitigation practice. Increasing outreach and community education efforts will, in turn, increase need for provider capacity for SUD services, particularly for residential treatment services. Kansas will need to engage facilities of 16 beds

or more (IMDs) to have the appropriate capacity for services at the residential and inpatient level.

2. Reductions in overdose deaths, particularly those due to opioids: Kansas continues its efforts toward reduction of opioid overdose deaths, and the addition of services under this IMD waiver exclusion is a crucial step in assuring access to treatment at all needed levels of care for Medicaid beneficiaries. KDADS currently provides ongoing certification training to SUD providers for Persons Centered Case Management based on the principals and practices of Strength Based Case Management as developed at the University of Kansas. KanCare delivers this service at all levels of care in SUD programs, and training outcomes reflect increased engagement and retention in services. Beginning in 2019, KanCare plans to require inpatient residential treatment facilities to:

- Offer and initiate MAT to all patients who would be clinical candidates for MAT; and
- Improve care coordination and transition of care to the community.

MCOs will report readmission rates and the State will work with KanCare MCOs to develop incentives and/or financial measures to hold residential treatment providers accountable for demonstrating effective engagement of all patients in long term recovery services and reducing readmissions.

3. Reduce utilization of emergency departments and inpatient hospital settings for OUD and other SUD treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services: KDADS contracts with three existing Community Crisis Centers (CCCs) that support and stabilize individuals and engage them in community-based treatment. Services include assessment, sobering, withdrawal management and referral to treatment. Medicaid pays CCCs for crisis intervention and counseling services (but not sobering or withdrawal management) for its beneficiaries. Early data show CCCs have been successful in diverting clients served from incarceration as well as admission to emergency rooms and hospitals. Continued expansion of MAT services, peer supported recovery services, and increased care coordination between community and hospital providers are outlined in the tables below as future actions to be taken in this waiver implementation.
4. Fewer readmissions to the same or higher level of care where readmissions are preventable or medically inappropriate for OUD and other SUDs: The KanCare program has taken measures to promote appropriate admissions for OUD and SUD treatment based on ASAM guidelines (see milestone tables below for more information). Beginning in 2019, KanCare MCOs will have to meet additional care coordination requirements for SUD, OUD and behavioral health conditions that specifically require MCOs to coordinate care with an aim toward reducing readmissions (see table 6 below).
5. Improved access to care for physical health conditions among beneficiaries with OUD or other SUDs: KanCare has made the integration of physical healthcare and behavioral healthcare a focus for the new contracts in effect in 2019. These provisions will improve care coordination and the physical health of beneficiaries with OUD. The State will require MCOs

to work with inpatient and residential facilities to facilitate care transitions and care coordination. The State is also encouraging new payment models to encourage better health outcomes through integration. (*Attachment, #1, KanCare 2.0 Section 1115 Waiver Demonstration Renewal Application, Final Submission, Dec 2017*).

Milestone 1: Access to Critical Levels of Care for OUD and Other SUDs- The spectrum of care required in Milestone 1 is summarized in the Table below.

Milestone Criteria	Current State	Future State	Summary of Actions Needed
Criteria for completion of milestone	Provide an overview of current SUD treatment services covered by the state in each level of care. For services currently covered in the state plan, list the benefit category and page location; for services currently covered in a demonstration, include the program name and Special Term and Condition number.	Provide an overview of planned SUD treatment services to be covered by the state in each level of care: indicate whether planned services will be added to the state plan or authorized through the 1115.	Provide a list of action items needed to be completed to meet milestone requirements, if any. Include persons or entities responsible for completion of each action item. Include timeframe for completion of each action item.
Coverage of outpatient services	The State covers outpatient non-residential treatment consisting of group, individual, and/or family counseling, community psychiatric support, crisis intervention, and peer support. The State requires an individualized treatment plan, based on ASAM criteria, to be completed within 30 days of admission, updated every 90 days (<i>Kansas Medicaid State Plan 3.1-A, 13.d. Page I</i>).	No changes.	None

Milestone Criteria	Current State	Future State	Summary of Actions Needed
Coverage of intensive outpatient services	Covered based on individualized plan and assessment tool that is based on ASAM criteria. Services delivered in regularly scheduled sessions of structured therapeutic activities that may include SUD educational didactic groups, group counseling, and individual counseling. <i>(Kansas Medicaid State Plan 3.1-A, 13.d. Page 1)</i>	No changes.	None
Coverage of medication assisted treatment (medications as well as counseling and other services with sufficient provider capacity to meet needs of Medicaid beneficiaries in the state)	Coverage includes Buprenorphine products and combo products with naloxone. The State restricts Methadone coverage to pain management. MAT counseling is provided. <i>(Kansas Medicaid State Plan 3.1-A, 13.d. Page 1)</i>	<p>KanCare will require inpatient and residential providers to offer or facilitate MAT initialization and treatment for all who meet the need criteria and choose treatment.</p> <p>KDADS will provide training and work with MCOs to build network capacity for MAT over the course of 2019.</p> <p>KanCare will study the issue of covering methadone for MAT use by September 30, 2019. The State is currently organizing those discussions currently with new agency leadership and will advise CMS as they progress.</p> <p>If the State decides to cover methadone for MAT use, it will issue a draft policy and begin related</p>	<p>Revision of KanCare MCO contracts and/or payment policies to require MAT care/coordination in residential/inpatient settings and education of the provider network.</p> <p>MCO credentialing of plans into the network and Payment live by 12-month mark.</p>

Milestone Criteria	Current State	Future State	Summary of Actions Needed
		State Plan amendment process by the end of calendar year 2019.	
Coverage of intensive levels of care in residential and inpatient settings	<p>Coverage of 24-hour medically directed evaluation and treatment services for SUD, with the availability of support services for co-occurring medical and mental disorders. (<i>Attachment #2, KMAP-SUD-PM</i>)</p> <p>The State currently covers ASAM levels 1, 2, 3.1, 3.3, 3.5, and 3.7 per the State Plan.</p>	<p>Coverage of SUD treatment includes IMDs with 16 or more beds that: (1) meet KDADS' licensing and certification requirements and (2) participate in MCO provider networks and meet appropriate credentialing requirements.</p> <p>Authorization for services will remain the same as MCOs' current procedure for residential SUD treatment (see Table 2 below).</p>	<p>Revision of Medicaid payment policies, and managed care contracts.</p> <p>Licensing and credentialing of IMDs as SUD residential providers by 12-month mark.</p> <p>Payment live by 12-month mark due to the time needed to license and credential IMDs as SUD providers.</p>
Coverage of medically supervised withdrawal management	<p>Per the Medicaid State Plan, covered for individuals whose withdrawal signs and symptoms are sufficiently severe to require primary medical and nursing care services. Includes 24-hour observation, monitoring, and counseling. (<i>Attachment #2 KMAP-SUD-PM</i>)</p>	No changes.	None

2. Use of Evidence-based, SUD-specific Patient Placement Criteria

Milestone Criteria	Current State	Future State	Summary of Actions Needed
Criteria for completion of milestone	Provide an overview of current state use of evidence-based, SUD-specific patient placement criteria and utilization management approach to ensure placement in appropriate level of care and receipt of services recommended for that level of care.	Provide an overview of planned state implementation of requirement that providers use an evidence-based, SUD-specific patient placement criteria and use of utilization management to ensure placement in appropriate level of care and receipt of services recommended for that level of care.	Specify a list of action items needed to be completed to meet milestone requirements. Include persons or entities responsible for completion of each action item. Include timeframe for completion of each action item.
Implementation of requirement that providers assess treatment needs based on SUD-specific, multi-dimensional assessment tools that reflect evidence-based clinical treatment guidelines	<p>The KanCare criteria for treatment is a fidelity-based adaptation of the ASAM Patient Placement Criteria.</p> <p>Contracted KanCare MCOs require their network providers to use ASAM criteria to assess patient treatment needs. Providers submit a common form to the KanCare MCOs to request authorization for residential treatment services. Each MCO uses its own criteria based on ASAM to make a determination to authorize treatment.</p>	KDADS will work with MCOs and providers to develop one standardized placement criteria that has fidelity to the ASAM placement criteria and uses a multi-dimensional assessment by 2021.	Revise the current Kansas State Approved Placement Criteria (currently not in use at the MCOs) with a new KDADS approved criteria, available online to both MCOs and all providers by 2021. All MCOs and providers will be required to use the revised assessment tool.

Milestone Criteria	Current State	Future State	Summary of Actions Needed
Implementation of a utilization management approach such that (a) beneficiaries have access to SUD services at the appropriate level of care	<p>KanCare MCO contracts require the implementation of a utilization management approach that ensures timely access to necessary services at the appropriate level of care. KanCare requires assessment, individual treatment plans and documentation of services. State monitoring of compliance is regular and ongoing.</p> <p><i>(Attachment #3-Current KanCare Contract EVT 0001028, Sections 2.2.40- 2.2.40.14)</i></p>	No changes.	None
Implementation of a utilization management approach such that (b) interventions are appropriate for the diagnosis and level of care	<p>MCOs must have in place and follow, written policies, procedures, and practice guidelines for processing requests for prior authorization and authorization for requests for continuing services. The policies, procedures, and practice guidelines shall include requirements for use of the Kansas medical necessity definition and the ASAM criteria.</p> <p><i>(Attachment #3-Current KanCare Contract EVT 0001028, Sections 2.2.40- 2.2.40.16)</i></p>	No changes.	None
Implementation of a utilization management approach such that (c) there is an	<p>MCOs are responsible for the development of utilization management for residential treatment. The State reviews and</p>	No changes.	None

Milestone Criteria	Current State	Future State	Summary of Actions Needed
independent process for reviewing placement in residential treatment settings	<p>approves MCO utilization management policies. The State also monitors grievances and appeals.</p> <p>The decision or request shall be made by a health care professional who has appropriate clinical expertise in treating the Member's condition or disease.</p> <p><i>(Attachment #3-Current KanCare Contract EVT 0001028, Sections 2.2.40- 2.2.40.16)</i></p>		

3. Use of Nationally Recognized SUD-specific Program Standards to Set Provider Qualifications for Residential Treatment Facilities

Milestone Criteria	Current State	Future State	Summary of Actions Needed
Criteria for completion of milestone	Provide an overview of current provider qualifications for residential treatment facilities and how these compare to nationally recognized SUD-specific program standards, e.g., the ASAM Criteria	Provide an overview of planned use of nationally recognized SUD-specific program standards in improving provider qualifications for residential treatment facilities.	Specify a list of action items needed to be completed to meet milestone requirements. Include persons or entities responsible for completion of each action item. Include timeframe for completion of each action item
Implementation of residential treatment provider qualifications in licensure requirements, policy manuals,	KDADS licenses all provider organizations delivering SUD services, including all residential treatment facilities (IMD and others). Licensing regulations include standards for program	KanCare contracts effective in on 1/1/19 and in subsequent years will specify ASAM program compliant (or other national standards i.e. CARF) as the credentialing	<p>Implementation of KanCare contracts effective on January 1, 2019.</p> <p>Development and use of ASAM program criteria compliant</p>

Milestone Criteria	Current State	Future State	Summary of Actions Needed
<p>managed care contracts, or other guidance. Qualification should meet program standards in the ASAM Criteria or other nationally recognized, SUD-specific program standards regarding, in particular, the types of services, hours of clinical care, and credentials of staff for residential treatment settings</p>	<p>management, clinical hours, clinical and supportive services, staffing ratios, staff qualifications, facility regulations, medication control, treatment planning, record keeping, client rights, confidentiality, and quality improvement. (<i>Attachment #4 Standards for Licensure/ Certification of Alcohol and/or Other Drug Abuse Programs, rev. 1/1/06</i>). The standards need to be reviewed and revised to meet ASAM program criteria and other national standards (i.e. CARF). See Future State for goals regarding revision.</p> <p>The Kansas Behavioral Sciences Regulatory Board (KSBSRB) licenses individual (non-agency) Addiction Counselors as Licensed Addiction Counselors or Licensed Masters Addiction Counselors. Standards and procedures are set forth in KAS 65-6607-6620 and KSBSRB regulations 102-7-1:12. (<i>see https://ksbsrb.ks.gov</i>)</p> <p>Under KanCare contracts, MCOs are responsible for assuring</p>	<p>standards for MCO provider agreements (<i>Attachment #5, Kansas Medicaid Managed Care (KanCare 2019) RFP EVT0005464 p.66-67</i>).</p> <p>The State will revise licensing standards within 12-24 months. To complete this step, the State will review MCO contract requirements for credentialing and is in the process of comparing current state licensing regulations to ASAM criteria to identify the extent of changes that will be required.</p> <p>Subsequently, the State will need to draft regulations for public comment and follow relevant state requirements before they are effective.</p>	<p>credentialing standards for residential care by all MCOs within 12 months.</p> <p>Revision (as needed) of licensing standards for residential care to comply with ASAM program criteria and other national standards within 12-24 months.</p>

Milestone Criteria	Current State	Future State	Summary of Actions Needed
	<p>the licensure and qualifications of providers according to the above established State licensure standards and Medicaid credentialing policies. (<i>Attachment #6 KanCare 2.0 RFP EVT 0005464- Attachment C- 3.0-SUD Services p. 11-13 and section 4.3.1.1.2-SUD Treatment and MAT p.14</i>)</p>		
<p>Implementation of a state process for reviewing residential treatment providers to ensure compliance with these standards</p>	<p>KDADS completes initial and periodic licensing surveys every 1-3 years, depending on compliance. (<i>Attachment #4 Standards for Licensure/ Certification of Alcohol and/or Other Drug Abuse Programs, rev. 1/1/06 and Attachment #7 KDADS Licensing Surveyor Tool</i>)</p>	<p>KDADS reviews and licenses IMDs in accordance with the Current State column of this row. By the 12-month mark, MCOs will credential them in their networks according to credentialing policies that conform to ASAM program criteria or other national standards for staffing, hours, access, training, and other relevant standards.</p>	<p>Development and use of ASAM program criteria compliant credentialing standards for residential care by all MCOs within 12 months.</p> <p>Update of licensing survey tool to examine provider compliance with any new program standards (e.g., types of services offered, hours of clinical care, staff credentials) within 12-18 months.</p>
<p>Implementation of requirement that residential treatment facilities offer MAT on-site or facilitate access off site</p>	<p>There is currently no requirement that residential treatment facilities offer MAT on-site. The State requires them to assess and refer as appropriate.</p>	<p>KanCare will require residential treatment providers to assess clients and initiate MAT onsite for willing clients.</p> <p>To complete this step, the State will review MCO contract requirements for</p>	<p>The State will update the licensing requirements within 12-24 months to require residential treatment providers to assess clients and initiate MAT onsite for willing clients.</p>

Milestone Criteria	Current State	Future State	Summary of Actions Needed
		<p>credentialing and is in the process of comparing current state licensing regulations to ASAM criteria to identify the extent of changes that will be required.</p> <p>Subsequently, the State will need to draft regulations for public comment and follow relevant state requirements before they are effective.</p>	MCOs will implement provision by 18-month mark.

4. Sufficient Provider Capacity at Critical Levels of Care including for Medication Assisted Treatment for OUD

Milestone Criteria	Current State	Future State	Summary of Actions Needed
Criteria for completion of milestone	Provide an overview of current provider capacities throughout the State to provide SUD treatment at each of the critical levels of care listed in Milestone 1.	Provide an overview of planned improvements to provider availability and capacity intended to improve Medicaid beneficiary access to treatment throughout the State at each of the critical levels of care listed in Milestone 1.	Specify a list of action items needed to be completed to meet milestone requirements. Include persons or entities responsible for completion of each action item. Include timeframe for completion of

Milestone Criteria	Current State	Future State	Summary of Actions Needed
			each action item.
<p>Completion of assessment of the availability of providers enrolled in Medicaid and accepting new patients in the following critical levels of care throughout the state (or at least in participating regions of the state) including those that offer MAT:</p> <p>Outpatient Services;</p> <p>Intensive Outpatient Services;</p> <p>Medication Assisted Treatment (medications as well as counseling and other services);</p> <p>Intensive Care in Residential and Inpatient Settings;</p> <p>Medically Supervised Withdrawal Management.</p>	<p>The MCOs submit Geo Mapping reports to the State each quarter. The reports include sub-reports by specialty (including SUD providers), provider access and availability reports, including distance to nearest provider, urgent access standards, county breakdowns, and trended access data. KDHE has established processes to monitor and manage the Reports. Provider network access standards require the MCOs to meet requirements for licensed outpatient, inpatient, intensive outpatient, residential treatment, and withdrawal management. <i>(Attachment #8 KanCare Network Adequacy Standards revised 8/6/18, p.9)</i></p> <p>If the State identifies a provider network deficiency, the State will work with the MCO to develop a plan of action to meet the standards and/or if an exception is necessary. The State may also issue a corrective action plan or liquidated damages, as appropriate.</p> <p>KDADS has assessed the needs and gaps in access to treatment, particularly MAT.</p>	<p>The State will require MCOs to expand the existing infrastructure of MAT providers to improve member access to MAT, particularly in rural areas. The State will use Geo Mapping reports to monitor compliance. MCO will provide semi-annual reports outlining the network adequacy of each MCO for all levels of SUD service, by geographic region. These semi-annual reports will also include the number of providers accepting new patients for each level of care. Where Geo mapping does not provide this level of granularity, MCOs will be required to gather data for credentialing and provider network databases and report it to the State.</p>	<p>The State will revise the provider network standards to include MAT by the 12-month mark.</p> <p>KDADS will implement MAT access assessment, training, and network development according to the SOR State plan submitted to SAMSHA for the 2019 project period.</p>

Milestone Criteria	Current State	Future State	Summary of Actions Needed
	Gaps vary by region and are most severe in rural and frontier regions of the State.	<p><i>(Attachment #5 Kansas Medicaid Managed Care (KanCare 2019) RFP EVT0005464 section 5.5.7 and section 5.8.3.2)</i></p> <p>The KDADS SOR coordinator will work closely with KDHE and its contracted MCOs to address MAT service gaps in rural and western regions of the State using its assessment summary for each region. KDADS will provide training to providers for increasing MAT capacity.</p>	

5. Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and OUD

Milestone Criteria	Current State	Future State	Summary of Actions Needed
Criteria for completion of milestone	Provide an overview of current treatment and prevention strategies to reduce opioid abuse and OUD in the State.	Provide an overview of planned strategies to prevent and treat opioid abuse and OUD.	Specify a list of action items needed to be completed to meet milestone requirements as detailed above. Include persons or entities responsible for

Milestone Criteria	Current State	Future State	Summary of Actions Needed
			completion of each action item. Include timeframe for completion of each action item.
Implementation of opioid prescribing guidelines along with other interventions to prevent opioid abuse	KDHE issued KMAP General Bulletin 18101- effective June 1, 2018, to amend its prescribing guidelines for Opioid Products Indicated for Pain Management to require prior authorization for all patients covered under Kansas Medicaid for any prescription of long acting opioids and any prescription of short acting opioids exceeding a 7-day supply, with exceptions. <i>(Attachment #9 KMAP General Map Bulletin 18101)</i>	Though the Governor’s SUD task force recommends requiring use of the prescription drug monitoring program (PDMP) K-TRACS by all clinicians authorized to prescribe medications subject to abuse and recommends all pharmacists register with K-TRACS, use is currently voluntary. Mandatory Registration with K-TRACS is currently under review by the KS AG as an administrative regulation. Once approved, the Board will implement the regulation. K-TRACS is integrating with the EHRs of large group providers, hospitals and pharmacies (Walmart and Sam’s pharmacies are currently linked). K-TRACS is working to have 100% of all pharmacies in the system.	Final review of mandatory K-TRACS registration (currently before the AG) by 06/19. Implementation of regulation by 12/19.
Expanded coverage of, and access to, naloxone for overdose reversal	Medicaid covers Naloxone in certain forms without prior authorization and it is available at pharmacies without a prescription <i>(K.A.R. 68-7-23)</i>	No changes.	None

Milestone Criteria	Current State	Future State	Summary of Actions Needed
Implementation of strategies to increase utilization and improve functionality of prescription drug monitoring programs	<p>Kansas remains a national leader for PDMPs. The Board created and hosted the first PDMP Administrators Roundtable in August 2017. K-TRACS includes all retail and outpatient dispensing records for any controlled substance or drug of concern dispensed in Kansas or to a Kansas resident, regardless of whether the pharmacy is in Kansas. The only exception is for quantities dispensed in the emergency room for 48 hours or less. The software accommodates large chains, independent and small pharmacies, and works seamlessly with the NABP PMP Interconnect® at no charge by NABP. PMPi facilitates the transfer and availability of PDMP data to all 41 participating states. Kansas is currently sharing data with 30 states. Prescriber E-Recap (PERx) is a convenient way for the PDMP to provide prescribers with a snapshot of their prescribing practices regarding controlled substances.</p>	<p>K-TRACS is expanding capabilities to provide interoperability services for all prescribers and pharmacists in Kansas to access K-TRACS through the PDMP Gateway®. This Statewide integration increases availability, ease of access, and use of a patient’s controlled substance prescription history for making critical and informed prescribing and dispensing decisions. This integration creates one-stop-shop making K-TRACS data directly available in the patient’s electronic record.</p> <p>Increase utilization of K-TRACS for surveillance and intervention.</p>	None

6. Improved Care Coordination and Transitions between Levels of Care

Milestone Criteria	Current State	Future State	Summary of Actions Needed
Criteria for completion of milestone	Provide an overview of current care coordination services and transition services across levels of care.	Provide an overview of planned improvements to care coordination services and transition services across levels of care.	Specify a list of action items needed to be completed to meet milestone requirements. Include persons or entities responsible for completion of each action item. Include timeframe for completion of each action item.
Implementation of policies to ensure residential and inpatient facilities link beneficiaries with community-based services and supports following stays in these facilities.	The State Opioid Response Grant includes activities of a State Opioid Coordinator to work with providers on care coordination and transition services across levels of care. MCOs are responsible to link beneficiaries with community-based services and providers that will coordinate transitions of care.	The current 1115 waiver expands the responsibilities of MCOs to ensure individualized care coordination and links with community-based recovery support for beneficiaries. <i>(Attachment #1 KanCare 2.0 Section 1115 Waiver Demonstration Renewal Application, Final Submission, Dec 2017)</i>	KDHE and KDADS will implement at coordinated approach to increasing service coordination across the spectrum of care, according to activities outlined in the State Opioid Response Grant and the KanCare 1115 waiver. These activities will be completed in a 12-month timeframe.

Milestone Criteria	Current State	Future State	Summary of Actions Needed
Additional policies to ensure coordination of care for co-occurring physical and mental health conditions	KanCare requires the provision of Person-Centered Case Management as a one-on-one goal-directed service for individuals with a SUD, to assist individual in obtaining access to needed family, legal, medical, employment, educational, psychiatric, and other services. For individuals served by an MCO, this service must be a part of the treatment plan developed and determined medically necessary by the MCO or by the contracted ASO for all others.	The current 1115 waiver under review at CMS (<i>Attachment #1 KanCare 2.0 Section 1115 Waiver Demonstration Renewal Application, Final Submission, Dec 2017</i>) increases support for individuals with behavioral health needs (including SUD) and expands MCO service coordination to assist individuals with accessing housing, food, employment, and other social needs. MCOs will also manage transitions of care between hospital and emergency room admissions to reduce readmission and adverse outcomes. (<i>Attachment #5 Kansas Medicaid Managed Care (KanCare 2019) RFP EVT0005464 p.11,31-35,56, 59-63</i>)	KDHE will implement Future State activities in accordance with the 1115 waiver implementation timetable within 12 months of waiver approval.

Section II – Implementation Administration

Please provide the contact information for the state’s point of contact for the Implementation Plan.

Name and Title Andy Brown, Commissioner of Behavioral Health Services
 Telephone Number: 785-291-3359
 Email Address: Andrew.Brown@ks.gov

Section III – Relevant Documents

Please provide any additional documentation or information that the state deems relevant to successful execution of the implementation plan.

Included under a separate cover are the following attached documents, referenced throughout this text:

1. KanCare Section 2.0 1115 Waiver Demonstration Renewal Application, Final Submission, Dec 2017
2. The Kansas Medical Assistance Program Substance Use Disorder Services Provider Manual (KMAP-SUD-PM)
3. Current KanCare MCO Contract EVT 0001028
4. Standards for Licensure/Certification of Alcohol and/or Other Drug Abuse Programs, rev. 1/1/06
5. Kansas Medicaid Managed Care (KanCare 2019) RFP EVT0005464
6. KanCare 2.0 RFP EVT 0005464 - Attachment C- 3.0-SUD Services
7. KDADS Licensing Surveyor Tool
8. KanCare Network Adequacy Standards revised 8/6/18
9. KMAP General Map Bulletin 18101

Attachment A –SUD Health Information Technology (IT) Plan

The Kansas State Board of Pharmacy is responsible for administration of the Kansas Prescription Drug Monitoring Program (PDMP), known as K-TRACS, which tracks and monitors Schedule II through IV controlled substances and other drugs of concern in Kansas. The goal of the PDMP is to prevent the misuse, abuse, and diversion of controlled substances and drugs of concern, while ensuring continued availability of these medications for legitimate medical use. The Board requires each dispenser (pharmacy) to electronically submit information to the central data collection system for each controlled substance prescription or drug of concern dispensed in an outpatient setting. Prescribers and pharmacists may register for K-TRACS through the Board prior to utilizing the system. K-TRACS is a real-time, web-based system, and users can obtain patient information instantly from any location at any time with the proper login credentials.³

The Board employs a Director and a program manager to oversee and administer the PDMP and an epidemiologist in a grant-funded position through August 2019 to analyze K-TRACS data and provide necessary reporting under the federal grants. Additional administrative support is provided by Board of Pharmacy licensing staff.

The Board contracts directly with Appriss for the K-TRACS software. Appriss is the PDMP vendor for 44 other states and provides a strong PDMP solution. The software accommodates large chains, independent and small pharmacies, and works seamlessly with the National Association of Boards of Pharmacy (NABP) - PMP Interconnect® (PMPi) which facilitates the transfer of PDMP data to the 47 participating states. Kansas is currently sharing data with 31 states, including Colorado, Oklahoma, and Texas and recently began sharing with the St. Louis, Missouri PDMP which covers 71 participating jurisdictions. Together these include 84% of the population of Missouri and 85% of the pharmacies.

The Board received a grant in 2012 from the Substance Abuse and Mental Health Services Administration (SAMSHA) through the U.S. Department of Health and Human Services which funded integration of K-TRACS data into the Lewis and Clark Information Exchange (LACIE) and Via Christi Health Systems, enabling a single sign-on for access to a patient's medical record and K-TRACS history. The Board, in conjunction with KDHE, is now expanding that project to provide interoperability services for all prescribers and pharmacists in Kansas to access K-TRACS through the PDMP Gateway®. The project is funded by a grant from the Centers for Disease Control awarded to KDHE. INTEGRx.8 makes K-TRACS data directly available in the patient's electronic record. As of January 2019, 33 hospital corporations (with multiple sites statewide) 130 pharmacy chains and independent pharmacies (with multiple locations statewide) and 11 physicians' offices are integrated with K-TRACS in Kansas.

NarxCare is the newest upgrade to the K-TRACS system beginning January 2019. NarxCare provides patient and clinical decision support beyond the state produced patient's prescription

³January 2018 Report to Legislature: https://pharmacy.ks.gov/docs/default-source/ktracs/reports/2018-pdmp-legislative-report---final.pdf?sfvrsn=d9caa501_2

history by: 1) Compiling multiple state reports into one cohesive profile; 2) Analyzing data to provide reports, use scores, predictive scores, red flags, visualizations, and K TRACS data including narcotics, sedatives, and stimulants; 3) Including Medication Assisted Treatment (MAT) locators and CDC printable educational handouts; and finally 4) The Care Team Communications, a powerful tool within NarxCare for the prevention and treatment of substance use disorder provides coordination of care.

K-TRACS was implemented and operated using federal grant funds through June 30, 2016. The Board has now exhausted available grant funding to sustain the program, and the only remaining grant funding is for program enhancements. While the Board continues to pursue grant opportunities, funding presents the largest obstacle to maintaining a PDMP in Kansas. A permanent funding solution will be required prior to July 1, 2019 to ensure program continuation.

Table 1. State Health IT / PDMP Assessment & Plan

Milestone Criteria	Current State	Future State	Summary of Actions Needed
<p><i>Implementation of comprehensive treatment and prevention strategies to address Opioid Abuse and OUD, that is:</i></p> <ul style="list-style-type: none"> <i>--Enhance the state’s health IT functionality to support its PDMP;</i> <i>and</i> <i>--Enhance and/or support clinicians in their usage of the state’s PDMP.</i> 	<p><i>Provide an overview of current PDMP capabilities, health IT functionalities to support the PDMP, and supports to enhance clinicians’ use of the state’s health IT functionality to achieve the goals of the PDMP.</i></p>	<p><i>Provide an overview of plans for enhancing the state’s PDMP, related enhancements to its health IT functionalities, and related enhancements to support clinicians’ use of the health IT functionality to achieve the goals of the PDMP.</i></p>	<p><i>Specify a list of action items needed to be completed to meet the HIT/PDMP milestones identified in the first column. Include persons or entities responsible for completion of each action item. Include timeframe for completion of each action item.</i></p>
Prescription Drug Monitoring Program (PDMP) Functionalities			
<p>Enhanced interstate data sharing to better track patient specific prescription data.</p>	<p>K-TRACS accommodates large chains, independent and small pharmacies, and works seamlessly with the NABP PMP Interconnect® (PMPi), provided by the National Association of Boards of Pharmacy at no charge. PMPi is a system which facilitates the transfer and availability of</p>	<p>Since Missouri has not been able to pass statewide legislation establishing a PDMP, Kansas is actively working connect St. Louis county and the other counties that have established a PDMP. St. Louis</p>	<p>Staff at the State Board of Pharmacy is responsible for K-TRACS coordinating with neighboring states. It is in the process of establishing PMPi links with PDMP active counties in</p>

Milestone Criteria	Current State	Future State	Summary of Actions Needed
	<p>PDMP data to all participating states (48 available). Kansas is currently sharing data with 32 states.</p>	<p>County launched its PDMP in April 2017. Fourteen other jurisdictions participate, and more are joining. Currently 84% of Missouri’s population live in county participating the PDMP program. Kansas will be sharing data with those PDMPs by October 2019.</p>	<p>Missouri and will go live with data exchange by October 2019. Kansas will continue to support efforts with the Nebraska legislature to share PDMP data, but no timeframe for completion can be established yet.</p>
<p>Enhanced “ease of use” for prescribers and other state and federal stakeholders.</p>	<p>K-TRACS disseminates materials, created under CDC guidelines, to healthcare providers and students as well as NGOs and academic instructors. MAT and pain management trainings also includes K-TRACS materials. An enhancement generates a “pop-up” in K-TRACS when a prescriber or pharmacist queries a threshold patient. Threshold patients are individuals who received at least five controlled substance prescriptions from prescribers and visited at least five pharmacies to fill those prescriptions in a 90-day period. The Board also maintains a website for K-TRACS at www.ktracs.ks.gov, with updated forms, frequently asked questions/answers, and other helpful resources for healthcare workers and the public. In addition, the Board publishes articles on best practices and</p>	<p>K-TRACS is in the process of implementing ease of use functionality for specialists. Specialists will be able to see prescribing patterns for other specialists in the same field, which will provide them with decision support on prescribing. and this enhanced feature is going live soon, funded by KDHE.</p> <p>NarxCare went live in January 2019, and provides patient and clinical decision support through reports, use scores, predictive scores, red flags and visualizations and</p>	<p>The Board of Pharmacy staff is responsible for adding functionality to the K-TRACS system, working with the State’s vendor(s). The enhanced features for specialists will be live by August 31, 2019.</p>

Milestone Criteria	Current State	Future State	Summary of Actions Needed
	reminders in a quarterly newsletter available on the Board website.	care coordination tools. It also includes MAT locators and CDC handouts.	
Enhanced connectivity between the state’s PDMP and any statewide, regional, or local health information exchange.	In 2012, K-TRACS integrated with the Lewis and Clark Information Exchange (LACIE) and Via Christi Health Systems, enabling a single sign-on for access to a patient’s medical record and K-TRACS history. The project, known as INTEGRx8, has expanded to provide interoperability services for all prescribers and pharmacists in Kansas to access K-TRACS through the PDMP Gateway®. The Kansas Health Information Network is actively pursuing a K-TRACS connection through the PDMP Gateway®.	K-TRACS is currently integrated with 33 hospital corporations (which have multiple additional locations statewide) 130 pharmacies and pharmacy chains (with multiple additional locations statewide), and 11 physician offices. K-TRACS will continue to work on integrating with more pharmacies (including CVS, which is not currently integrated) and more outpatient practices (including dentists and specialists).	The Board of Pharmacy staff is responsible for adding any new functionality to the K-TRACS system, working with the State’s vendor(s).
Enhanced identification of long-term opioid use directly correlated to clinician prescribing patterns ⁴ (see also “Use of PDMP” #2 below).	In December 2017, the Board announce the first Prescriber E-Recap (PERx). PERx is a quick, convenient way for K-TRACS to provide prescribers with a snapshot of their prescribing practices regarding controlled substances. The PERx covers the previous six-month period and includes: (1) How many patients the prescriber has	The Board recently received additional CDC grant funding through KDHE to add advanced clinical alerts to the K-TRACS system. The system provides clinical alerts directly to K-TRACS users and use indicators	The Board of Pharmacy staff will continue to pursue future funding opportunities with the Federal agencies (in conjunction with KDADS and KDHE as appropriate), but Kansas’ efforts have been limited by

⁴ Shah A, Hayes CJ, Martin BC. Characteristics of Initial Prescription Episodes and Likelihood of Long-Term Opioid Use — United States, 2006–2015. MMWR Morb Mortal Wkly Rep 2017;66:265–269. DOI: <http://dx.doi.org/10.15585/mmwr.mm6610a1>.

Milestone Criteria	Current State	Future State	Summary of Actions Needed
	<p>prescribed opioids to, as well as a comparison to other prescribers within the prescriber’s specialty; (2) Morphine Milligram Equivalent (MME) information is broken out so the prescriber can readily see where their opioid prescribing falls within multiple MME ranges; (3) Opioid treatment duration shows the percentage of their patients who have been prescribed opioids for fewer than 7 days, 7 to 28 days, 29 to 90 days, or more than 90 days; (4) K-TRACS usage shows how much the prescriber and their delegate(s) are using K-TRACS; (5) Multiple Provider Episodes (MPE) provide a look at the number of the prescriber’s patients who have met or exceeded the K-TRACS threshold – five prescribers and five pharmacies within 90 days; and (6) Dangerous Combination Therapy provides the prescriber with details of their patients’ combination therapies that may increase a patient’s risk for overdose.⁵</p>	<p>that a patient may have multiple provider episodes, previous overdose history, prescriptions for dangerous drug combinations, or high prescription milligram morphine equivalents. INTEGRx8 delivers a more efficient and patient-oriented program, saves users 4.22 minutes per patient on average, and increases the utilization of K-TRACS by a factor of seven. A supplemental FY2019 CDC grant award will allow the Board to deploy the NARxCARE® enhancement, which provides additional metrics, tools, and risk scores for patients prescribed controlled substances and drugs of concern.</p>	<p>recent requirements of several federal agencies to use RX Check (the Federal PDMP data hub being used by BJA, CDC and other Federal Agencies). The terms and conditions for RX Check are in conflict with Kansas’ data use policy. Until such issues are resolved, (i.e. RX Check conforms its data disclosure policy with law enforcement to conform with the more restrictive policies in most states), Kansas will not seek federal funds for new grant initiatives that require use of RX Check.</p>
<p>Current and Future PDMP Query Capabilities</p>			

⁵ January 2018 Report to Legislature: https://pharmacy.ks.gov/docs/default-source/ktracs/reports/2018-pdmp-legislative-report---final.pdf?sfvrsn=d9caa501_2

Milestone Criteria	Current State	Future State	Summary of Actions Needed
<p>Facilitate the state’s ability to properly match patients receiving opioid prescriptions with patients in the PDMP (i.e. the state’s master patient index (MPI) strategy regarding the PDMP query).</p>	<p>The use of K-TRACS is not mandatory in Kansas. As the Board launches statewide integration of K-TRACS data into hospital and pharmacy electronic health records systems, use of the Gateway is expected to increase queries substantially. These systems can check a patient’s controlled substance prescription history more than one time per second and counts may represent multiple checks per patient.</p>	<p>The K-TRACS staff will continue to work closely with State partners from other agencies and providers to increase utilization of the system. The Board envisions that expansion of the Gateway is the best way to increase use and allow providers to properly match opioid prescriptions for their patients in the PDMP.</p> <p>The State will explore feasibility and options of developing a shared Master Patient Index.</p>	<p>The Board of Pharmacy staff is responsible for adding any new functionality to the K-TRACS system, working with the State’s vendor(s).</p>
<p>Use of PDMP – Supporting Clinicians with Changing Office Workflows / Business Processes</p>			
<p>Develop enhanced provider workflow/ business processes to better support clinicians in accessing the PDMP prior to prescribing an opioid or other controlled substance to address the issues which follow.</p>	<p>The integration of K-TRACS, LACIE, and Via Christi Health Systems enabling a single sign-on for patient medical record access in conjunction with the PDMP Gateway® gives Kansas an opportunity to deliver a more efficient and patient-oriented program. This integration allows prescribers and pharmacists to log into one program instead of separate system to query patient data which takes valuable time away from patient care and interaction. This integration simplifies the process by</p>	<p>INTEGRx.8 makes K-TRACS data directly available in the patient's electronic record. As of January 2019, 33 hospital corporations (with multiple sites statewide) 130 pharmacy chains and independent pharmacies (with multiple locations statewide) and 11 physicians' offices are integrated with K-TRACS in Kansas.</p>	<p>The Board of Pharmacy staff is responsible for adding any new functionality to the K-TRACS system, working with the State’s vendor(s).</p>

Milestone Criteria	Current State	Future State	Summary of Actions Needed
	<p>creating a one-stop-shop making K-TRACS data directly available in the patient's electronic record and saving 4.22 minutes per patient, on average and up to 10 minutes per patient in rural areas.</p>		
<p>Develop enhanced supports for clinician review of the patients' history of controlled substance prescriptions provided through the PDMP—prior to the issuance of an opioid prescription.</p>	<p>In December 2017, the Board announce the first Prescriber E-Recap (PERx). PERx is a quick, convenient way for the PDMP to provide prescribers with a snapshot of their prescribing practices regarding controlled substances. The PERx covers the previous six-month period and includes: (1) How many patients the prescriber has prescribed opioids to, as well as a comparison to other prescribers within the prescriber's specialty. (2) The system provides Morphine Milligram Equivalent (MME) information broken out so the prescriber can readily see where their opioid prescribing falls within multiple MME ranges. (3) Opioid treatment duration shows prescribers the percentage of their patients prescribed opioids for fewer than 7 days, 7 to 28 days, 29 to 90 days, or more than 90 days. (4) K-TRACS usage, which shows how much the prescriber and their delegate(s) are using K-TRACS. (5) Multiple Provider Episodes (MPE) provide a look at the number of the prescriber's patients who</p>	<p>The Board will continue to expand the use of PERx with clinicians using the PDMP and will establish daily MME guidelines and compliance with those guidelines to providers using the PDMP.</p> <p>INTEGRx.8 makes K-TRACS data directly available in the patient's electronic record. As of January 2019, 33 hospital corporations (with multiple sites statewide) 130 pharmacy chains and independent pharmacies (with multiple locations statewide) and 11 physicians' offices are integrated with K-TRACS in Kansas.</p>	<p>The Board of Pharmacy staff will be responsible for adding functionality to the K-TRACS system, working with the State's vendor(s).</p>

Milestone Criteria	Current State	Future State	Summary of Actions Needed
	<p>have met or exceeded the K-TRACS threshold of 5/5/90 – five prescribers and five pharmacies within 90 days. (6) Dangerous Combination Therapy provides the prescriber with details of their patients’ combination therapies that may increase a patient’s risk for overdose.⁶</p>		
Master Patient Index / Identity Management			
<p>Enhance the master patient index (or master data management service, etc.) in support of SUD care delivery.</p>	<p>The Kansas Eligibility Enforcement System (KEES) system includes a master person index (MPI) for each person that applies for Medicaid. The MPI serves as the system of record for all person-based information throughout KEES. The MPI issues a “client ID number” that identifies a person throughout KEES.</p> <p>The State recognizes limitations in currently supported patient matching in the PDMP and intends to find ways to link this issue to improve data linkage and identity mapping.</p>	<p>The State will explore feasibility and options of developing a shared Master Patient Index.</p>	<p>The Board of Pharmacy staff will be responsible for adding this functionality to the K-TRACS system, working with the State’s vendor(s). The Board will identify: (1) facilitators and barriers, and (2) options to link Patient Identifiers and across different systems.</p>
Overall Objective for Enhancing PDMP Functionality & Interoperability			

⁶ January 2018 Report to Legislature: https://pharmacy.ks.gov/docs/default-source/ktracs/reports/2018-pdmp-legislative-report--final.pdf?sfvrsn=d9caa501_2

Milestone Criteria	Current State	Future State	Summary of Actions Needed
Leverage the above functionalities / capabilities / supports (in concert with any other state health IT, TA, or workflow effort) to implement effective controls to minimize the risk of inappropriate opioid overprescribing—and to ensure that Medicaid does not inappropriately pay for opioids.	Through the integration described in milestone objectives above, K-TRACS providers, including those treating Medicaid beneficiaries are using the tools and methods supported in the PDMP to minimize inappropriate opioid prescribing.	Continuation of all initiatives stated in the milestones above.	. The Board of Pharmacy staff will continue to pursue future funding opportunities with the Federal agencies (in conjunction with KDADS and KDHE as appropriate), but Kansas’ efforts have been limited by recent requirements of several federal agencies to use RX Check (the Federal PDMP data hub being used by BJA, CDC and other Federal Agencies).

Attachment A, Section II – Implementation Administration

Please provide the contact information for the state’s point of contact for the SUD Health IT Plan.

Name and Title: Lori K. Haskett, Assistant Director, K-TRACS
 Telephone Number: 785-296-4040
 Email Address: lori.k.haskett@ks.gov

Attachment A, Section III – Relevant Documents

Please provide any additional documentation or information that the state deems relevant to successful execution of the implementation plan.

1. January 2018 Report to Legislature: https://pharmacy.ks.gov/docs/default-source/ktracs/reports/2018-pdmp-legislative-report---final.pdf?sfvrsn=d9caa501_2
2. Presentation by Board of Pharmacy in December 2017 (contains great background on the PDMP): https://qioprogram.org/sites/default/files/editors/141/KS_PDMP_Recording_508.pdf
3. Presentation by Board of Pharmacy in March 2017: https://www.deadiversion.usdoj.gov/mtgs/pharm_awareness/conf_2017/march_2017/wic_hita/kenton.pdf

4. 2nd Quarter 2018 K-TRACS Quarterly Review: https://pharmacy.ks.gov/docs/default-source/ktracs/reports/july-20-2018.pdf?sfvrsn=ecba501_2

Table: Substance Use Disorder Demonstration Planned Metrics

Planned Metric

¹There are no CMS-mandated metrics related to substance 1.
²See also 4 in the substance 1 planned metrics for substance 1. 10% rates calculated for the remainder per the column 2.
³The rates should use column 2 for specific calculation methods for specific metrics as explained in Version 4.0 of the Medical Devices 1115 Substance Use Disorder Demonstration Monitoring Protocol Worksheet.
⁴Rules 1 and 2 reported for Metric #171 (corresponds to rates 1 and 2 for Metric #17 from Version 1.1 of the Medical Devices 1115 Substance Use Disorder Demonstration Technical Specifications for Monitoring Metrics.
⁵Rules 1 and 2 reported for Metric #172 (corresponds to rates 1 and 2 for Metric #17 from Version 1.1 of the Medical Devices 1115 Substance Use Disorder Demonstration Technical Specifications for Monitoring Metrics.
⁶While governance and appeals metrics are recommended for reporting, the rates in required per 42 CFR 411.426(a)(5), to provide updates on the results of health plan resolution services of completed during the reporting year, including updates on governance and appeals from beneficiaries, as in the annual OIG monitoring report.

Medicaid Section 1115 SUD Demonstrations Protocol (Part A) - Planned Subpopulations (Version)
 State: Kansas
 Demonstration Name: KanCare

Table: Substance Use Disorder Demonstration Planned Subpopulations

Planned subpopulation reporting							Alignment with CMS-provided technical specifications manual			
Subpopulation category	Subpopulations	Reporting priority	Relevant metrics	Subpopulation type	State will report (Y/N)	Subpopulations		Relevant metrics		
						Attest that planned subpopulation reporting within each category matches the description in the CMS-provided technical specifications manual (Y/N)	If the planned reporting of subpopulations does not match (i.e., column G = "N"), list the subpopulations state plans to report (Format comma separated) ^{a,c}	Attest that metrics reporting for subpopulation category matches CMS-provided technical specifications manual (Y/N)	If the planned reporting of relevant metrics does not match (i.e., column I = "N"), list the metrics for which state plans to report for each subpopulation category (Format metric number, comma separated)	
EXAMPLE: Age group <i>(Do not delete or edit this row)</i>	EXAMPLE: Children <18, adults 18-64, and older adults 65+	EXAMPLE: Required	EXAMPLE: Metrics #1-3, 6-12, 23, 24, 26, 27	EXAMPLE: CMS-provided	EXAMPLE: Y	EXAMPLE: N	EXAMPLE: Children/Young adults 12-21, Adults 21-65	EXAMPLE: N	EXAMPLE: 1, 2, 3	
Age group	Children <18, adults 18-64, and older adults 65+	Required	Metrics #1-3, 6-12, 23, 24, 26, 27	CMS-provided	Y	Y		Y		
Dual-eligible status	Dual-eligible (Medicare-Medicaid eligible), Medicaid only	Required	Metrics #1-3, 6-12	CMS-provided	Y	Y	Dual-eligible status is determined through a field in our data warehouse "Dual Ind"	Y		
Pregnancy status	Pregnant, Not pregnant	Required	Metrics #1-3, 6-12	CMS-provided	Y	Y	Pregnancy Status is determined through a field in our data warehouse "Pregnancy Ind"	Y		
Criminal justice status	Criminally involved, Not criminally involved	Required	Metrics #1-3, 6-12	CMS-provided	Y	N	State currently doesn't have reliable method to flag Medicaid claims with criminal association, but is continuing to look for a solution.	Y		
OUD population	Opioid diagnosis	Recommended	Metrics #2-12, 23, 24, 26, 27, 36	CMS-provided	Y	Y	OUD status is determined by whether an individual has claim meeting the metric's specifications with an OUD diagnosis code as listed in the SUD HEDIS VSD V3	Y		
<i>(Insert rows for any state-specific subpopulation(s))</i>										

Table: Substance Use Disorder Demonstration Planned Subpopulations

Planned subpopulation reporting

^a If the state is not reporting a required subpopulation category (i.e., column F = "N"), enter explanation in corresponding row in column H.
^b If the state is reporting on the Dual-eligible status, Pregnancy status, Criminal justice status, and OUD population subpopulation categories, the state should use column H to outline its subpopulation identification approach as explained in Version 4.0 of the Medicaid Section 1115 Substance Use Disorder Demonstrations Monitoring Protocol Instructions.
^c If the state is planning to phase in the reporting of any of the subpopulation categories, the state should (1) select N in column G and (2) provide an explanation and the

Medicaid Section 1115 Substance Use Disorder Demonstrations Monitoring Protocol Template

PRA Disclosure Statement - This information is being collected to assist the Centers for Medicare & Medicaid Services in program monitoring of Medicaid Section 1115 Substance Use Disorder Demonstrations. This mandatory information collection (42 CFR § 431.428) will be used to support more efficient, timely and accurate review of states' SUD 1115 demonstrations monitoring reports submissions to support consistency of monitoring and evaluation of SUD 1115 Demonstrations, increase in reporting accuracy, and reduce timeframes required for monitoring and evaluation. Under the Privacy Act of 1974 any personally identifying information obtained will be kept private to the extent of the law. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid Office of Management and Budget (OMB) control number. The OMB control number for this project is **0938-1148 (CMS-10398 #57)**." If you have comments concerning the accuracy of the time estimate(s) or suggestions for improving this form, please write to: CMS, 7500 Security Boulevard, Attn: PRA Reports Clearance Officer, Mail Stop C4-26-05, Baltimore, Maryland 21244-1850.

1. Title page for the state’s substance use disorder (SUD) demonstration or the SUD component of the broader demonstration

The state should complete this title page as part of its SUD monitoring protocol. Definitions for certain rows are provided below the table. The Performance Metrics Database and Analytics (PMDA) system will populate some rows of the table. The state should complete the rest of the table. The state can revise the demonstration goals and objectives if needed. PMDA will use this information to populate part of the title page of the state’s monitoring reports.

State	<i>Kansas</i>
Demonstration name	<i>KanCare</i>
Approval period for section 1115 demonstration	<i>01/01/2024 – 12/31/2028</i>
SUD demonstration start date^a	<i>01/01/2024</i>
Implementation date of SUD demonstration, if different from SUD demonstration start date^b	<i>01/01/2024</i>
SUD (or if broader demonstration, then SUD-related) demonstration goals and objectives	<i>Under this SUD Demonstration, KanCare beneficiaries will have access to high quality, evidence-based OUD and other SUD treatment services ranging from medically supervised withdrawal management to on-going chronic care for these conditions in cost-effective settings while also improving care coordination and care for comorbid physical and mental health conditions.</i>

^a **SUD demonstration start date:** For monitoring purposes, CMS defines the start date of the demonstration as the *effective date* listed in the state’s STCs at time of SUD demonstration approval. 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 demonstration. In many cases, the effective date is distinct from the approval date of a demonstration; that is, in certain cases, CMS may approve a section 1115 demonstration with an effective date that is in the future. For example, CMS may approve an extension request on 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 demonstration:** The date the state began claiming or will begin claiming federal financial participation for services provided to individuals in institutions for mental disease.

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. Acknowledgement of budget neutrality reporting requirements

- The state has reviewed the Budget Neutrality Workbook (which can be accessed via PMDA – see Monitoring Protocol Instructions for more details) and understands the expectations for quarterly and annual monitoring reports. The state will provide the requested budget neutrality information (with no modifications).

4. 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 (Qs) of the section 1115 SUD 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 monitoring report for a state with a first SUD demonstration year (DY) of less than 12 months, should include data for any baseline period Qs preceding the demonstration, as described in Part A of the state’s monitoring protocols. (See Appendix B of the Monitoring Protocol Instructions for further instructions on determining baseline periods for first SUD 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 section 1115 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 its demonstration through the end of the current reporting period. The state should report this information in Part B of its monitoring 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 the metrics data. Unlike other monitoring report submissions, for instance, the state is not required to describe all metric changes (+ or - greater than 2 percent). Rather, the assessment is an opportunity for a state to provide context on its retrospective metrics

data and to support CMS's review and interpretation of these data. 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. This state may decide to highlight this trend for CMS in Part B of its monitoring report (under Milestone 4) by briefly summarizing the trend and explaining that during this period, a grant supporting training for new MAT providers throughout its state was implemented.

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

- The state will report retrospectively for any Qs 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 Qs prior to monitoring protocol approval: *Insert narrative description of proposed alternative plan for retrospective reporting. Regardless of the proposed plan, retrospective reporting should include retrospective metrics data and a general assessment of metric trends for the period. The state should provide justification for its proposed alternative plan.*

***KanCare Section
1115(a)
Demonstration
Evaluation
Design***

Revised per CMS feedback

July 23, 2025

A. General Background Information	1
B. Evaluation Design – Parents and Other Caretaker Relatives Component	3
Demonstration Goal	3
Evaluation Hypothesis.....	3
Parents and Other Caretaker Relatives Change Theory.....	3
Evaluation Questions	4
C. Evaluation Methodology – Parents and Other Caretaker Relatives	7
Quantitative Evaluation Methodology	7
Qualitative Evaluation Methodology	10
D. Methodological Limitations – Parents and Other Caretaker Relatives	12
Evaluation Design Limitations.....	12
E. Evaluation Design – Substance Use Disorder Component	14
Demonstration Hypothesis and Goals	14
Substance Use Disorder Driver Diagram.....	14
Evaluation Questions and Hypotheses.....	15
Quantitative Evaluation.....	16
Qualitative Evaluation.....	28
F. Evaluation Methodology – Substance Use Disorder	30
Quantitative Evaluation Methodology	30
Qualitative Evaluation Methodology	44
Cost Evaluation Methodology	46
G. Methodological Limitations – Substance Use Disorder	50
Evaluation Design Limitations.....	50
H. Attachment	
Independent Evaluator.....	52
Timeline and Major Milestones	53
I. References	54

List of Tables and Figures

Tables:

Parents and Other Caretaker Relatives Component Evaluation Tables

Table 1. Quantitative Evaluation Questions and Measures – Parents and Caretaker Relatives.....	5
Table 2. Qualitative Evaluation Questions – Parents and Caretaker Relatives	6

Table 3.	Demographic Stratifications of Parents and Other Caretaker Relatives – January 1, 2024	7
Table 4.	Performance Measures Details – Parents and Other Caretaker Relatives	8
Table 5.	Detailed Discussion of Data Sources – Parents and Caretaker Relatives	12

Substance Use Disorder Component Evaluation Tables

Table 6.	Goals, Evaluation Questions, and Hypotheses – Substance Use Disorder.....	16
Table 7.	Summary of Measures and Analytic Approach for Primary Driver 1 (Outcome Evaluation).....	17
Table 8.	Summary of Measures and Analytic Approach for Primary Driver 2 (Outcome Evaluation)	18
Table 9.	Summary of Measures and Analytic Approach for Primary Driver 3 (Outcome Evaluation)	19
Table 10.	Summary of Measures and Analytic Approach for Primary Driver 4 (Outcome Evaluation)	20
Table 11.	Summary of Measures and Analytic Approach for Primary Driver 5 (Outcome Evaluation)	21
Table 12.	Summary of Measures and Analytic Approach for Secondary Driver 1 (Process Evaluation).....	22
Table 13.	Summary of Measures and Analytic Approach for Secondary Driver 2 (Process Evaluation).....	22
Table 14.	Summary of Measures and Analytic Approach for Secondary Driver 3 (Process Evaluation).....	24
Table 15.	Summary of Measures and Analytic Approach for Secondary Driver 4 (Process Evaluation).....	25
Table 16.	Summary of Measures and Analytic Approach for Secondary Driver 5 (Process Evaluation).....	26
Table 17.	Summary of Measures and Analytic Approach for Secondary Driver 6 (Process Evaluation).....	27
Table 18.	Examples of the Survey Questions for the Qualitative Evaluation – Substance Use Disorder.....	29
Table 19.	Data Sources for Quantitative Evaluation – Substance Use Disorder.....	30
Table 20.	Demographic Stratifications of SUD Study Population – 2023 (estimated).....	33
Table 21.	Drivers and Associated Performance Measures for Substance Use Disorder Goal 1.....	35
Table 22.	Drivers and Associated Performance Measures for Substance Use Disorder Goal 2.....	37

Table 23. Drivers and Associated Performance Measures for Substance Use Disorder Goal 3.....	40
Table 24. Drivers and Associated Performance Measures for Substance Use Disorder Goal 4.....	42
Table 25. Drivers and Associated Performance Measures for Substance Use Disorder Goal 5.....	44
Table 26. Data Sources for the Qualitative Evaluation – Substance Use Disorder.....	45
Table 27. Type-of-Care Cost Drivers	48
Table 28. Diagnosis and Treatment Cost Drivers.....	49

Attachment H Tables

Table 29. Timeline and Major Milestones – Parents and Other Caretaker Relatives	53
Table 30. Timeline and Major Milestones – Substance Use Disorder	53

Figures:

Parents and Other Caretaker Relatives Component Evaluation Tables

Figure 1. Parents and Other Caretaker Relatives Driver Diagram.....	3
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Substance Use Disorder Component Evaluation Tables

Figure 2. Substance Use Disorder Driver Diagram.....	15
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A. General Background Information

The KanCare demonstration was originally approved on December 27, 2012, for a five-year demonstration period effective from January 1, 2013, through December 31, 2017. The Centers for Medicare & Medicaid Services (CMS) then approved a one-year temporary extension of this demonstration on October 13, 2017. A five-year extension approved on December 18, 2018, extended the KanCare program from January 1, 2019, through December 31, 2023, under two concurrent Section 1115 demonstrations—the KanCare 2.0 demonstration and the Substance Use Disorder (SUD) demonstration. On December 28, 2022, the State of Kansas submitted a Medicaid section 1115 demonstration five-year renewal application to extend certain features of the demonstrations. Other aspects of the KanCare program were transferred to other spending authorities.¹

This KanCare Section 1115(a) demonstration will continue four programs that have been authorized under expenditure authority.¹

- From the KanCare 2.0 demonstration, this five-year demonstration will
 - Maintain 12-month continuous eligibility for parents and other caretaker relatives,
 - Maintain continuous eligibility for the duration of the COVID-19 Public Health Emergency (PHE) unwinding period for Children’s Health Insurance Program (CHIP) enrollees who turned 19 during the COVID-19 PHE unwinding period (and therefore lost eligibility for CHIP due to age) and who are otherwise ineligible for Medicaid, and
 - Continue federal financial participation for services provided in Institutions for Mental Diseases (IMDs) for Medicaid beneficiaries with Substance Use Disorder (SUD).
- From the SUD demonstration, this five-year demonstration will
 - Continue federal financial participation for physician consultation and personal care services for individuals with behavioral health needs.

With this extension of the KanCare demonstration, CMS required the State to submit an Evaluation Design with two components—one evaluating the program that maintains 12-month continuous eligibility for parents and other caretaker relatives and a second component evaluating the two programs related to SUD.¹ The evaluation designs with these two components are described in this document. A separate evaluation design was required for program maintaining continuous enrollment for CHIP enrollees. As per CMS guidance provided in the Special Terms and Conditions (STCs) for the KanCare demonstration, this evaluation design document was drafted in accordance with the STCs’ Attachment A (Developing the Evaluation Design).¹

The State has noted in its KanCare Section 1115(a) demonstration renewal application that the demonstration will maintain the critical goal of ensuring people still have access to the care and services through providing continuous eligibility for eligible adults and access to SUD services that cannot be authorized elsewhere.²

The State’s justification for providing the twelve-month continuous eligibility for parents and other caretaker relatives included the following points.³

- As studies have shown, Kansas can minimize insurance gaps and guarantee better access to care for an extended period with the twelve-month continuous eligibility policy for parents and other caretakers.⁴
- Having consistent access to needed preventive health care services improves health outcomes and reduces long-term health care costs.

- Continuous eligibility has been crucial during the coronavirus pandemic to prevent gaps in coverage.
- This policy implementation will decrease Medicaid administrative costs by allowing Kansas to enroll beneficiaries for twelve months, regardless of changes in income that occur during that period.

Through its KanCare section 1115 waiver, the State covered the services provided to Medicaid-eligible individuals aged 21 through 64 who are enrolled in an MCO and who are receiving services in a publicly-owned or non-public institution for mental diseases (IMD).²

The State noted the KanCare 2.0 and SUD demonstrations, implemented during 2019 through 2023, better addressed opioid use disorder (OUD) and other SUDs and to improved access to high-quality addiction services.² The KanCare SUD program provided access to high quality, evidence-based OUD and other SUD treatment services ranging from medically supervised withdrawal management to on-going chronic care for these conditions in cost-effective settings while also improving care coordination and care for comorbid physical and mental health conditions.² In its renewal application, the State also summarized the key results of the SUD demonstration interim evaluation conducted to examine the demonstration's progress towards achieving its five goals. The State noted the primary drivers for Goals 1 through 4 showed improvements or mixed results, whereas the primary drivers for Goal 5 did not provide evidence of improvements specific to the SUD demonstration, but did experience improvements to some of the outcomes overall. Four of the five secondary drivers showed evidence they contributed to improvements to Goals 2 through 5.² To build upon the successes and the areas of improvement of the KanCare SUD demonstration, the State's SUD Demonstration Implementation Plan, initially approved for the period from August 7, 2019, through December 31, 2023, remains in effect for the current demonstration period.⁵ The implementation plan is in alignment with the goals and objectives of the State's mandatory Medicaid managed care program. The implementation plan outlines the State's strategy to provide a full continuum of services for SUD treatment to KanCare members encompassing the five goals of the demonstration. The continuation of the strategies in the implementation plan allows the State to estimate the effects of the demonstration over a longer period, thus providing valuable insights into developing strategies and policies for further improving the members' access to and quality of the SUD services.

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B. Evaluation Design – Parents and Other Caretaker Relatives Component

Demonstration Goal

Goal: The KanCare demonstration, as it applies to 12-month continuous eligibility for parents and other caretaker relatives, will assist the state in its goal to “provide better access to services and reduce ineffective disenrollment for certain populations.”¹

Evaluation Hypotheses

Per CMS instructions, this evaluation is to focus on how the continuous eligibility policy affects coverage, enrollment, and churn (i.e., temporary loss of coverage in which beneficiaries are disenrolled but then reenroll within 12 months), as well as population-specific appropriate measures of service utilization and health outcomes. In addition, the eligible parents and other caretaker relatives, MCO, and State perceptions and experiences regarding the policy merits will be assessed.⁶

The following evaluation hypotheses will be examined through quantitative and qualitative components.

Hypothesis 1: The continuous eligibility policy will decrease temporary losses of coverage in which parents and other caretaker relatives are disenrolled but then reenrolled within 12 months.

Hypothesis 2: The continuous eligibility policy will provide continued access to preventive, acute, and chronic health care to parents and other caretaker relatives.

Parents and Other Caretaker Relatives Change Theory

The following driver diagram for the Parent and Other Caretaker Relatives amendment (Figure 1) shows the relationship between the amendment’s purpose, the primary driver that contributes directly to achieve the purpose, and the secondary driver necessary to achieve the primary driver.

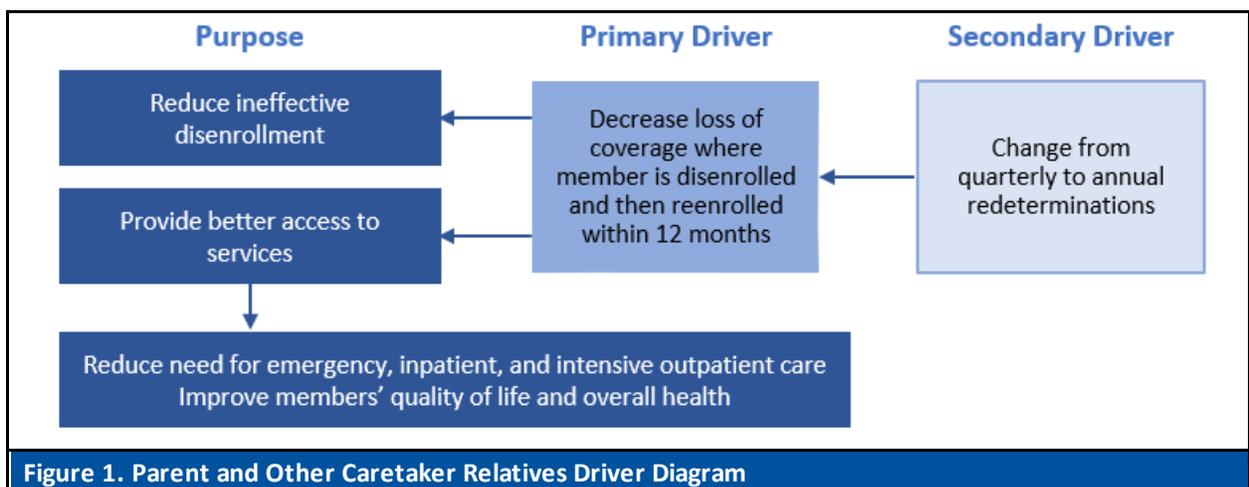


Figure 1. Parent and Other Caretaker Relatives Driver Diagram

As the diagram illustrates, changing the State’s enrollment processes from quarterly to annual redeterminations for parents and other caretaker relatives is expected to lead to a decrease in loss of coverage where the member is disenrolled and then reenrolled within 12 months. That in turn is expected to enable the State to realize its stated goals of reducing ineffective disenrollment and providing better access to services.

Better access to services should lead to secondary benefits, although not explicitly stated as goals for the amendment, that are in line with the CMS quality mission, “To achieve optimal health and well-being for all individuals.”² Secondary benefits include reducing the need for emergency, inpatient, and intensive outpatient care, and improving members’ quality of life and overall health. These benefits are obtained through increased use of preventive care, continuity of care for chronic conditions, and treatment of acute conditions before they exacerbate into requiring emergency, inpatient, or extensive outpatient care.

The change theory does not hypothesize that implementation of the amendment will yield annual increases in service utilization rates or increases or decreases in disparities between racial, ethnic, regional, or other types of subpopulations. The theory assumes that services received by individuals during periods of enrollment gained through the amendment (i.e., periods that they would not have been eligible under quarterly redetermination) would be typical of services received during periods in which they would have been eligible under quarterly redetermination. Changes in utilization rates from year to year or within subpopulations are assumed to be due to outside factors (e.g., the severity of new strains of infectious diseases, regional changes in provider networks, or educational campaigns regarding racial or ethnic disparities).

Evaluation Questions

Quantitative Evaluation Questions

The first quantitative evaluation question relates to disenrollment from and reenrollment into KanCare by parents and other caretaker relatives. The question is, “Did the continuous eligibility policy decrease temporary losses of coverage?”

The second quantitative question asks, “What was the eligible members’ service utilization during the measurement period?” Ideally, analyses of enrollment and claims data could identify services members received during periods when they would not have been enrolled had the amendment not been implemented. However, this cannot be done for two reasons. Claims data are not available for periods in which members are disenrolled (a limitation to baseline rates), and members who would have lost enrollment under quarterly redetermination cannot be identified with annual redeterminations. Given these data limitations, the evaluation assumes the services received directly as a result of the amendment would be typical of services received by parent and other caretaker relatives at large.

The third quantitative evaluation question, “What preventive, chronic, and acute care services were received during the measurement period?” explores the benefits of continuous enrollment on preventive, chronic, and acute care. As with the second question, the data available only allows for an indirect assessment. By looking at rates for the full parent and other caretaker relatives population, the probabilities that a member’s preventive, chronic, and acute care may have benefited from the amendment is obtained. However, the amounts the amendment may have changed the outcome measures related to this question cannot be determined.

The evaluation questions and corresponding measures used to answer the evaluation questions are presented in Table 1.

Table 1. Quantitative Evaluation Questions and Measures – Parents and Other Caretaker Relatives	
Evaluation Question	Measures
Question 1: Did the continuous eligibility policy decrease temporary losses of coverage?	
1.a. Did fewer members experience temporary loss of coverage?	Percent of members experiencing temporary loss of coverage
1.b. How many additional months of coverage did the policy provide?	Months of temporarily lost coverage per 100 members Additional months per 100 members = (baseline rate – current rate)
Question 2: What was the eligible members' service utilization during the measurement period?	
2.a. What types of services did eligible members access during the measurement period?	Summary of encounters by type of service: <ul style="list-style-type: none"> • Professional Visits • Outpatient Visits <ul style="list-style-type: none"> ○ Emergency Department Visits • Pharmacy Fills • Inpatient Stays • Dental Visits • Vision Visits • NEMT Trips
2.b. What diagnoses were associated with services received by eligible members during the measurement period?	Summary of diagnosis prevalence: <ul style="list-style-type: none"> • Primary diagnoses by ICD-10-CM chapter • Primary diagnoses by ICD-10-CM block or category Summary of inpatient stays by diagnosis: <ul style="list-style-type: none"> • CMS Major Diagnostic Category (MDC) • Medicare Severity Diagnosis Related Group (MS-DRG)
2.c. Did eligible members receive new diagnoses during the measurement period? If so, what diagnoses?	Summary of diagnosis incidence: <ul style="list-style-type: none"> • Diagnoses by ICD-10-CM chapter • Diagnoses by ICD-10-CM block or category
Question 3: What preventive, chronic, and acute care services were received during the measurement period?	
3.a. Did treatment for chronic conditions, including behavioral health issues, received in the prior measurement period continue during current measurement period?	Service utilization by chronic condition: <ul style="list-style-type: none"> • Asthma • Diabetes • Behavioral Health • Others to be determined based on prevalent diagnoses (question 2.b) Prescription (pre-existing prescriptions) prevalence rates by therapeutic class Percent of members with a prescription filled in 4 consecutive quarters
3.b. What were the patterns of preventive and acute health care during the measurement period?	Prescription (new prescriptions) incidence rates by therapeutic class ED visits, observation stays, or inpatient admissions for selected conditions: <ul style="list-style-type: none"> • Acute respiratory infections • Acute severe asthma • Diabetic Ketoacidosis/ Hyperglycemia • SUD • Mental health issues • External Causes of Morbidity Outpatient or professional claims for selected acute conditions: <ul style="list-style-type: none"> • Respiratory infections • Others to be determined based on prevalent diagnoses (question 2.b) Percent of members receiving selected preventive care: <ul style="list-style-type: none"> • Annual physical exam • Annual dental visit • Annual eye exam HEDIS measures: <ul style="list-style-type: none"> • Adults' Access to Preventive/Ambulatory Health Services (AAP) • Ambulatory Care (AMB) • Inpatient Utilization (IPU) – General Hospitalization/Acute Care • Other HEDIS measures to be determined based on prevalent diagnoses

Qualitative Evaluation Questions

The qualitative evaluation question will focus on the experiences of the parents and other caretaker relatives during periods of temporary loss of coverage from KanCare. This question will be asked of members, State staff, and MCO staff.

Table 2 lists the primary question and a draft of auxiliary questions (used to answer the primary question). Final versions of auxiliary questions will be designed by a KFMC committee of subject matter experts. The questionnaire development will include an input and approval from the State.

Table 2. Qualitative Evaluation Questions – Parents and Other Caretaker Relatives	
Primary and Auxiliary Questions	
1. What are the experiences of the parents and other caretaker relatives during periods of temporary loss of coverage from KanCare?	
Draft Questions for Member Survey	
1.a	What were the reasons for a temporary loss of coverage from KanCare?
1.b	During the period of temporary loss of coverage from KanCare, did you have other insurance coverage?
1.c	During this period of temporary loss of coverage from KanCare, were you able to maintain treatment for existing conditions?
1.d	During this period of temporary loss of coverage from KanCare, did you delay or not get care for any new conditions?
1.e	During this period of temporary loss of coverage from KanCare, did you delay or not get any prescriptions filled?
1.f	During this period of temporary loss of coverage from KanCare, did you delay or not get preventive care, such as annual physicals, dental checkups or cleanings, vision care, flu shots, or cancer screening?
1.g	How this period of temporary loss of coverage from KanCare affected you and your family's life?
Draft Questions for State and MCO Staff	
1.h	What were the reasons for members to have a temporary loss of coverage from KanCare?
1.i	During the period of temporary loss of their coverage from KanCare, did these members have other insurance coverage?
1.j	During this period of temporary loss of their coverage from KanCare, were these members able to maintain treatment for existing conditions?
1.k	During this period of temporary loss of their coverage from KanCare, did these members delay or not get care for any new conditions?
1.l	During this period of temporary loss of their coverage from KanCare, did these members delay or not get prescriptions filled?
1.m	During this period of temporary loss of their coverage from KanCare, did these members delay or not get preventive care, such as annual physicals, dental checkups or cleanings, vision care, flu shots, or cancer screenings?
1.n	What were the effects of a period of temporary loss of coverage from KanCare on members and their families?

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C. Evaluation Methodology – Parents and Other Caretaker Relatives

The focus of the evaluation is to examine the achievement of the amendment’s goal to provide continued Medicaid coverage to eligible parents and other caretaker relatives to help them achieve improved health outcomes and to reduce long-term health care costs. The evaluation will be completed through quantitative and qualitative analysis.

Quantitative Evaluation Methodology

The quantitative evaluation will focus on describing patterns in health and health care among eligible parents and other caretaker relatives during the amendment period.

Evaluation Period

September 1, 2022 – December 31, 2028

Study Population

The study population will be KanCare members identified as parents and other caretaker relatives by aid category description “Caretaker Medical – Parent or Caretaker.”

As of January 1, 2024, there were 45,700 KanCare members identified as parents and other caretaker relatives. Table 3 shows the distribution of these members across several demographic variables. Note, the study population does not include members eligible for KanCare by the aid category “Caretaker Medical – Pregnant Women.”

Table 3. Demographic Stratifications of Parents and Other Caretaker Relatives – January 1, 2024					
Stratum	Count	Percent	Stratum	Count	Percent
Total (denominator)	45,665	100%			
Gender:			Primary Language Spoken:		
Male	7,673	16.8%	English	42,960	94.1%
Female	37,992	83.2%	Not English	2,705	5.9%
Age:			Ethnicity:		
0 to 17 years	47	0.1%	Hispanic or Latino	7,025	15.4%
18 to 24 years	6,765	14.8%	Not Hispanic or Latino	31,112	68.1%
25 to 34 years	18,890	41.4%	Ethnicity Unknown	7,528	16.5%
35 to 44 years	14,223	31.1%	Race:		
45 or older	5,740	12.6%	White, alone	31,154	68.2%
Region:			Black/African American (AA), alone	5,955	13.0%
Urban	24,569	53.8%	Race other than White or Black/AA	1,522	3.3%
Semi-Urban	6,361	13.9%	White or Black/AA, not alone	3,897	8.5%
Densely-settled Rural	9,313	20.4%	Unknown, alone or with a race	3,137	6.9%
Rural	4,281	9.4%			
Frontier	1,141	2.5%			

Data Sources

All quantitative analysis will use the Kansas Modular Medicaid System (KMMS) databases for encounter, demographic, eligibility, and enrollment information. The managed care organizations’ member-level HEDIS data files may also be accessed for HEDIS measures. See Section D for detailed discussion of data sources.

Analytic Methods

Performance measures for identifying patterns in health and health care are detailed in Table 4. Where possible, measures are developed according to technical specifications for recognized measures from sources such as: *Adult Core Set* measures, including *Healthcare Effectiveness Data and Information Set*[®] (HEDIS) measures, stewarded by the National Committee for Quality Assurance (NCQA) and endorsed by the National Quality Forum (NQF). Descriptive statistics will be used for the evaluation, with comparisons across the consecutive years. The following analytical methods will be used to assess the evaluation questions:

- Data obtained from various sources will be reviewed for missing values, inconsistent patterns, and outliers to ensure quality and appropriateness for analyses required by the evaluation design.
- Descriptive statistics will examine demographic characteristics of the study population.
- The descriptive statistics (e.g., numbers and percentages or rates) of selected evaluation measures will be stratified by demographic characteristics including age range, race, ethnicity, and MCO. If needed, race and ethnicity categories with few members will be combined.
- Statistical tests such as Fisher’s exact, Pearson chi-square, or Mantel-Haenszel chi-square tests, with p less than 0.05 indicating significance, will be used to compare percentages or rates between strata as appropriate to the data.
- The first two measures listed in Table 4 will be examined for the pre-demonstration and demonstration periods to assess any change over time. Other measures will be examined over the demonstration period.

Table 4. Performance Measure Details – Parents and Other Caretaker Relatives			
Performance Measure	Denominator	Numerator	Unit of Measure
Measures of coverage calculated from enrollment data			
Percent of members experiencing temporary losses in coverage	Members in the study population at any point in the measurement year	Members in the denominator disenrolled from KanCare and reenrolled within 12 months	Percentage
Months of temporarily lost coverage per 1,000 members	Enrollment of study population in member-months	Number of months between disenrollment and subsequent reenrollment	Months per 1,000 members
NCQA HEDIS measures calculated from MCO data			
Adults’ Access to Preventive/Ambulatory Health Services (AAP)	Study Population	Members in denominator who had one or more ambulatory or preventive care visits during the measurement year	Percentage
Ambulatory Care (AMB) Summary of outpatient and ED visits	Enrollment of study population in member-months	Visits	Visits per 1,000 member-months
Inpatient Utilization (IPU) Stratified by maternity, surgical, and medical stays	Enrollment of study population in member-months	Number of acute inpatient discharges during the measurement period	Days per 1,000 member-months
Measures calculated from KMMS claim and encounter data			
Summary of Encounters by Type of Service: <ul style="list-style-type: none"> • Inpatient Stays • Outpatient Visits <ul style="list-style-type: none"> ○ Emergency Department • Professional Visits • Pharmacy Fills • Dental Visits • Vision Visits • NEMT Trips 	Enrollment of study population in member-months	Services	Services per 1,200 member-months

Table 4. Performance Measure Details – Parents and Caretaker Relatives (Continued)			
Performance Measure	Denominator	Numerator	Unit of Measure
Summary of diagnosis prevalence Diagnoses by ICD-10-CM chapter, block, or category	Encounter records – duplicated to count diagnosis category codes once per member per date of service	Deduplicated encounter records in stratum	Percentage
Summary of inpatient stays by diagnosis <ul style="list-style-type: none"> • CMS Major Diagnostic Category (MDC) Medicare Severity Diagnosis Related Group (MS-DRG) 	Inpatient stays	Inpatient stays in stratum	Percentage
Summary of diagnosis incidence Diagnoses by ICD-10-CM chapter, block, or category	Study Population	Members having at least one diagnosis code in the specified chapter or category from claims with dates of service in the measurement period and not having any diagnosis codes in that code’s category from claims with dates in the prior measurement period	Percentage
Service utilization by chronic condition <ul style="list-style-type: none"> • Asthma • Diabetes • Behavioral Health • Others to be determined 	Study Population	Members with an inpatient, outpatient, or professional encounter having a primary or secondary diagnosis for the given condition during the measurement period	Percentage
Prescription (pre-existing prescriptions) prevalence rates by therapeutic class	Members who had a pharmacy claim with the given therapeutic class during the prior measurement period	Members in the denominator who had a pharmacy claim with the given therapeutic class during the measurement period	Percentage
Percent of members with a prescription filled in 4 consecutive quarters	Study Population	Members in denominator with a prescription filled in 4 consecutive quarters of the measurement year	Percentage
Prescription (new prescriptions) incidence rates by therapeutic class	Study Population	Members who had a prescription with the given therapeutic class filled during the measurement period but did not a prescription with the same therapeutic class filled within the prior measurement period	Percentage
ED visits, observation stays, or inpatient admissions for selected conditions: <ul style="list-style-type: none"> • Acute respiratory infections • Acute severe asthma • Diabetic Ketoacidosis/ Hyperglycemia • SUD • Mental health issues • External Causes of Morbidity 	Enrollment of study population in member-months	Days of service	Days per 1,200 member-months

Table 4. Performance Measure Details – Parents and Caretaker Relatives (Continued)

Performance Measure	Denominator	Numerator	Unit of Measure
Outpatient or professional claims for selected acute conditions: <ul style="list-style-type: none"> Respiratory infections Others to be determined based on prevalent diagnoses 	Enrollment of study population in member-months	Days of service	Days per 1,200 member-months
Percent of members receiving selected preventive care: <ul style="list-style-type: none"> Annual physical exam Annual dental visit Annual eye exam 	Study Population	Members in denominator who received the selected service during the measurement year	Percentage

Qualitative Evaluation Methodology

The focus of the qualitative evaluation will be to describe the experiences of the parents and other caretaker relatives during periods of temporary loss of coverage from KanCare. The qualitative analysis is designed to complement the quantitative evaluation. Whereas the quantitative analysis looks at benefits the members may be obtaining through continuous enrolment, the qualitative analysis is designed to estimate the extent to which members were not able to obtain services during times of temporary disenrollment. Questions will be asked of members, State staff, and MCO staff.

Evaluation Period

September 1, 2022 – December 31, 2028

Study Population

The study population will be KanCare members identified as parents and other caretaker relatives by aid category description “Caretaker Medical – Parent or Caretaker” who had a temporary disenrollment between two twelve-month continuous KanCare coverage periods. Preliminary analysis estimates there will be 1,800 to 2,000 members in the study population per year.

Also, MCO and State staff involved in member enrollment or case management will be asked to provide anecdotal information related to the experiences of these members.

Data Sources

Online Member Surveys: An online member survey will be conducted using appropriate software (such as Microsoft Forms). Letters with a link and QR code for web-based completion of the survey will be mailed to these members. The survey data will be collected on a quarterly basis during 2026, 2027, and 2028. All members with temporary loss of coverage identified from the KMMS eligibility and enrollment tables (i.e., the study population) will be eligible to participate. Surveys will be sent in the quarter in which eligible members regained coverage.

Preliminary analysis indicates approximately 6,000 members are expected to formulate the study population in this three-year period. Based on a survey recently conducted using similar methods, between 150 and 180 responses are expected, which would yield margins of error between 7% and 8% on a 95% confidence interval for questions with 50% response distributions. These intervals will be sufficient to identify the types of services not obtained during periods of temporary loss of coverage and categorize them as not obtained by a few members, by some members, by many members, or by most

members. The survey will include open- and close-ended questions. The overarching patterns and themes related to the member experiences will be described from open-ended questions. Please note, probabilistic-statistical generalizability to the study population will not be the main focus of the survey.

MCO and State Questionnaires: The State and MCO questionnaires will be designed by a KFMC committee of subject matter experts. The questionnaire development will include an input and approval from the State. The questionnaires will be emailed to primary contacts at the State and three MCOs with directions to compile the questionnaire responses with input from the subject matter experts within their organizations. Questions will parallel those of the member survey and focus on determining types of services not obtained during periods of temporary loss of coverage and categorize them as not obtained by a few members, by some members, by many members, or by most members. The State and MCOs will also be asked for anecdotal information regarding members' experiences throughout the demonstration period. The primary contacts will be asked to return the completed questionnaires to KFMC through email. The State and MCO responses to the questionnaire will be collected in 2026, 2027, and 2028.

Analytic Methods

Qualitative data analysis techniques will be used to analyze data collected from the stakeholders. The steps for qualitative data analysis will include

- Getting familiar with the data by looking for common observations and patterns;
- Developing a coding framework to identify broad ideas, concepts, behaviors, or phrases;
- Assigning codes for structuring and labeling data;
- Identifying themes, patterns, and connections to answer research questions; and
- Summarizing the qualitative information to add to the overall evaluation results.

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D. Methodological Limitations – Parents and Other Caretaker Relatives

Evaluation Design Limitations

Limitations to the methodology that are inherent to the source data are presented in Table 5, which also describes the data, efforts for cleaning and validation, and data quality. Three additional limitations are noteworthy:

- While administrative data might be able to identify key cases and statistical trends, these are usually limited in providing detailed health and health behavior information, thus making it difficult to obtain information on possible covariates.
- Due to the use of population-level data, the effect sizes of measured differences represent true differences; however, these may or may not correspond to meaningful changes.
- As the evaluation is based on multiple years, the definitions and specifications of the evaluation measures, policies for data collection, and infrastructure of the data sources may change during the evaluation period, thus leading to unavailability of appropriate data for the analysis.

Table 5. Detailed Discussion of Data Sources – Parents and Caretaker Relatives	
Data Source	Kansas Modular Medicaid System (KMMS) claim and encounter tables
Type	Claims and encounters
Description	Encounter/claims data submitted to the State by MCOs used to support HEDIS® and other performance, service utilization, and cost metrics for all enrollees
Efforts for Cleaning and Validation	<ul style="list-style-type: none"> • KMMS claims and encounter data obtained from KMMS will be reviewed for missing values, duplicate values, inconsistent patterns, and outliers to ensure quality and appropriateness of data for analyses of performance measures required by the evaluation design. • Encounter data related pay-for-performance metrics are validated annually by KFMC as a part of their validation of all pay-for-performance metrics. • For applying statistical procedures for analysis of performance measures, a final dataset with all required variables will be created by merging data variables obtained from the KMMS encounter database with other source data.
Quality and Limitations	<ul style="list-style-type: none"> • Encounters submitted to the State by MCOs are records of the billed claims MCOs receive from providers for service payment. Administrative claims and encounter data are routinely used in HEDIS and other performance measurement. These data sources will be used in the evaluation to determine changes in access to services, quality of care, and health outcomes. Most of the measures selected for assessment of the evaluation questions are validated and widely used for this purpose. • Data are generally considered complete if one quarter is allowed for claims processing and encounter submission. • There is known inconsistency in the population of the MCO claim status field for zero-dollar paid claims. • Payment amounts by Medicare and commercial payors are incomplete.
Data Source	Kansas Modular Medicaid System eligibility and enrollment tables
Type	Medicaid eligibility, enrollment, and MCO assignments
Description	Eligibility and enrollment detail for Medicaid members used to determine enrollee aid category and stratify data into subgroups
Efforts for Cleaning and Validation	<ul style="list-style-type: none"> • Data variables obtained from the KMMS eligibility and enrollment database will be merged with data from other data sources to create a final database for applying statistical procedures for analysis of performance measures.
Quality and Limitations	<ul style="list-style-type: none"> • Quality is high. • Enrollment records include beginning and end dates for eligibility periods. • MCOs receive updated KMMS eligibility and enrollment data daily.

Table 5. Detailed Discussion of Data Sources – Parents and Other Caretaker Relatives (Continued)

Data Source	Kansas Modular Medicaid System member tables
Type	Medicaid member and demographic data
Description	The tables contain data on current and past members. Demographic data includes member’s name, contact information, date of birth, date of death, gender, race, and ethnicity.
Efforts for Cleaning and Validation	<ul style="list-style-type: none"> Data variables obtained from KMMS demographics database will be merged with data from other data sources to create a final database for applying statistical procedures for analysis of performance measures. Contact information will be reviewed for missing and invalid entries prior to conducting member surveys.
Quality and Limitations	<ul style="list-style-type: none"> Contact information is frequently not up to date. Email addresses are not available. Other demographics are considered high quality. MCOs receive updated KMMS member data daily. The coding of race and ethnicity changed in 2022, which limits comparisons to prior years’ stratified rates.
Data Source	HEDIS data from MCOs
Type	Data for HEDIS performance measures
Description	Member-level detail tables for HEDIS measures submitted by the MCOs that provide numerator and denominator values for stratified HEDIS results.
Efforts for Cleaning and Validation	<ul style="list-style-type: none"> Comparison of numerator and denominator counts to NCQA-certified compliance audit results. The MCOs subcontract with HEDIS Certified Auditors to validate their HEDIS data for NCQA submission. KFMC subcontracts with a different HEDIS Certified Auditor to conduct validation of MCO HEDIS data following CMS EQR protocols.
Quality and Limitations	<ul style="list-style-type: none"> Data Quality is closely monitored by the MCOs and EQRO. MCOs use NCQA Certified HEDIS software to calculate HEDIS measures and submit data to NCQA as part of their NCQA accreditation requirement. Data become available seven months after the measurement year. This can affect the availability of data for conducting the evaluation for the entire five-year period of the demonstration.
Data Source	Online Member Survey
Type	Qualitative survey data
Description	An online survey will collect qualitative information from parents and other caretaker relatives who had a temporary disenrollment between two twelve-month continuous KanCare coverage periods. The survey data will be collected on quarterly basis during 2026, 2027 and 2028.
Efforts for Cleaning and Validation	<ul style="list-style-type: none"> Information from the online survey will be reviewed for completeness and clarity. Themes will be identified to understand the members’ experiences during the gap in their continued KanCare coverage. Stratified response rates will be reviewed.
Quality and Limitations	<ul style="list-style-type: none"> Few members may participate in the survey. Results may not be generalizable to the study population due to low response rates. Open-ended responses may not clearly communicate the respondent’s intended message.
Data Source	State and MCO Questionnaire
Type	Qualitative data
Description	The questionnaire will be emailed to the State and MCO staff asking them to provide information related to the experiences of the parents and other caretaker relatives who had a gap in their KanCare enrollment between their two twelve-month continuous coverage periods. The questionnaire will be emailed to State and MCO staff in 2016, 2017 and 2018 to capture the information regarding members’ experiences throughout the demonstration period.
Efforts for Cleaning and Validation	<ul style="list-style-type: none"> State and MCO staff responses to the questionnaire will be reviewed for completeness and clarity. Themes will be identified to understand the members’ experiences during temporary gaps in KanCare coverage.
Quality and Limitations	<ul style="list-style-type: none"> Open-ended responses may not clearly communicate the respondent’s intended message.

E. Evaluation Design – Substance Use Disorder Component

The State’s SUD Demonstration Implementation Plan, initially approved for the period from August 7, 2019, through December 31, 2023, remains in effect for the approval period from January 1, 2024, through December 31, 2028. The SUD Demonstration Implementation Plan is in alignment with the goals and objectives of the state’s mandatory Medicaid managed care program.¹ The implementation plan outlines the State’s strategy to provide a full continuum of services for SUD treatment to KanCare members.⁵ This evaluation design builds upon and maintains most of the features included in the evaluation design for the 2019–2023 demonstration period.⁸

Demonstration Hypothesis and Goals

Hypothesis: The demonstration will improve access to appropriate SUD services for members with SUD.

Goals: Kansas will use the 1115(a) demonstration authority to pursue the following goals to improve access to appropriate SUD services for members with SUD:

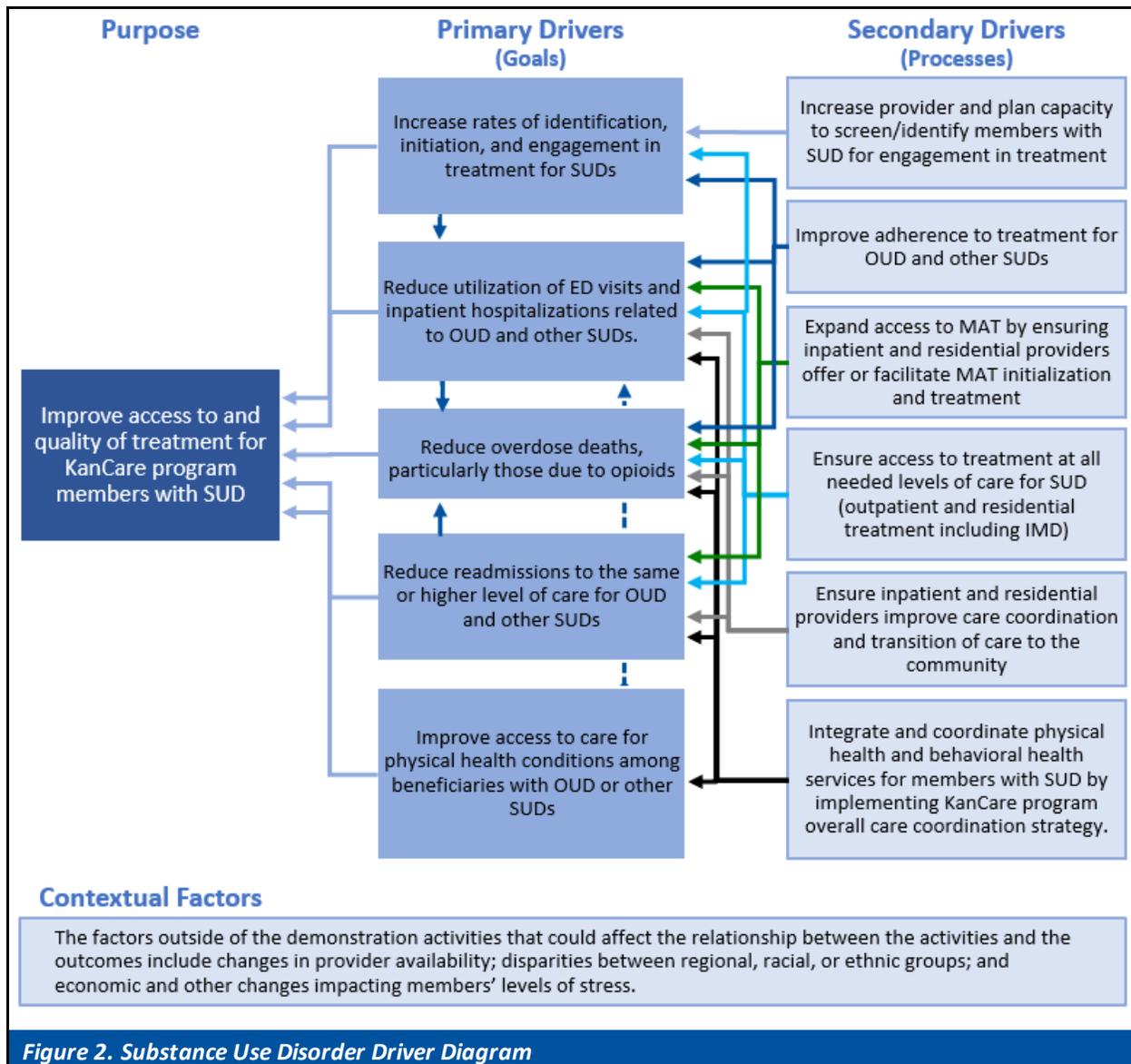
1. Increased rates of identification, initiation, and engagement in treatment for opioid use disorder (OUD) and other SUDs
2. Reduced utilization of emergency department (ED) and inpatient hospital settings for OUD and other SUD treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services
3. Reduction in overdose deaths, particularly those due to opioids
4. Fewer readmissions to the same or higher level of care where readmissions are preventable or medically inappropriate for OUD and other SUDs
5. Improved access to care for physical health conditions among members with OUD or other SUDs

Substance Use Disorder Driver Diagram

The following driver diagram for the SUD component (Figure 2) shows the relationship between the demonstration’s purpose, the primary drivers that contribute directly to achieve the purpose, and the secondary drivers necessary to achieve the primary drivers. The primary drivers are the demonstration’s stated goals and are later referred to as outcomes in this evaluation design. The secondary drivers are later referred to as processes.

The demonstration will continue federal financial participation for services provided in Institutions for Mental Diseases (IMDs) for KanCare members with SUD by removing payment barriers for the services provided in IMDs. This strategy is related to the Secondary Driver 4, and in turn primarily contributes to Goal 1 and indirectly contributes to Goals 2, 3, and 4.

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Evaluation Questions and Hypotheses

Per CMS instructions, this evaluation will assess the demonstration's impact during the extension period, and includes quantitative, qualitative, and cross-cutting cost components.⁶

The evaluation questions and hypothesis used to assess the demonstration's goals for the SUD component are described in Table 6. The five primary drivers and six secondary drivers, as shown in the driver diagram for the overall SUD demonstration (Figure 2, above), support the hypotheses for the five evaluation questions to assess the performance of the SUD demonstration. The SUD component's goals in Table 6 are the primary drivers shown in Figure 2.

Table 6. Goals, Evaluation Questions, and Evaluation Hypotheses – Substance Use Disorder		
Goals	Evaluation Questions	Evaluation Hypotheses
1. Increased rates of identification, initiation, and engagement in treatment for OUD and other SUDs.	1. Does the demonstration increase access to and utilization of SUD treatment services?	1. The demonstration will increase the percentage of members who are referred and engaged in treatment for SUDs.
2. Reduced utilization of emergency departments and inpatient hospital settings for OUD and other SUD treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services.	2. Does the demonstration decrease the rate of emergency department visits and inpatient hospitalizations related to SUD within the member population?	2. The demonstration will decrease the rate of emergency department visits and inpatient hospitalizations related to SUD within the member population.
3. Reductions in overdose deaths, particularly those due to opioids.	3. Does the demonstration decrease opioid-related overdose deaths?	3. The demonstration will decrease the rate of overdose deaths due to opioids.
4. Fewer readmissions to the same or higher level of care where readmissions are preventable or medically inappropriate for OUD and other SUDs.	4. Do enrollees receiving SUD services experience reduction in readmissions to the same or higher level of care for OUD and other SUDs?	4. Among members receiving care for SUD, the demonstration will reduce readmissions to SUD treatment.
5. Improved access to care for physical health conditions among members with OUD or other SUDs.	5. Do enrollees receiving SUD services experience improved access to care for physical health conditions?	5. The demonstration will increase the percentage of members with SUD who access care for physical health conditions.
Related to Goals 1 through 4.	6. Does removing payment barriers for services provided in IMDs for KanCare members improve member access to SUD treatment services?	6. The demonstration will increase the KanCare members' access to SUD treatment services in IMDs by removing payment barriers for services provided in IMDs.

Quantitative Evaluation

The evaluation hypotheses for the six demonstration evaluation questions will be assessed. The demonstration evaluation questions and hypotheses are matched to their respective drivers and measure details within the following tables:

- Tables 7 to 11 provide information on the outcome evaluation according to the five primary drivers (primary analytic method is noted for each measure).
- Tables 12 to 17 provide information on the process evaluation according to the six secondary drivers (primary analytic method is noted for each measure).

Where applicable, measures were developed according to recognized measures from sources, such as,

- 1115 Substance Use Disorder Demonstrations: Technical Specifications for Monitoring Metrics (“CMS Metrics”);
- Adult Core Set measures including those endorsed by the National Quality Forum (NQF) and stewarded by the National Committee for Quality Assurance (NCQA), and the Pharmacy Quality Alliance (PQA); and
- Healthcare Effectiveness Data and Information Set® (HEDIS) measures.

Outcome Evaluation – Primary Drivers

Table 7. Summary of Measures and Analytic Approach for Primary Driver 1 (Outcome Evaluation)					
Demonstration Goal 1: Increased rates of identification, initiation, and engagement in treatment for OUD and other SUDs.					
Evaluation Question 1: Does the demonstration increase access to and utilization of SUD treatment services?					
Evaluation Hypothesis 1: The demonstration will increase the percentage of members who are referred and engaged in treatment for SUDs.					
Measure Description	Steward	Denominator	Numerator	Data Source	Analytic Approach
Initiation and Engagement of Alcohol and Other Drug Dependence Treatment (IET)	NQF #0004 NCQA	Initiation: Members who were diagnosed with a new episode of alcohol or drug dependency during the first 10½ months of the measurement year	Initiation: Number of members who began initiation of treatment through an inpatient admission, residential, outpatient visits, intensive outpatient encounter, or partial hospitalization within 14 days of the index episode start date	HEDIS data from MCOs	Descriptive statistics; Comparison of rates between the years (Fisher’s exact or Pearson’s chi-square tests); Trend analysis (Mantel-Haenszel χ^2); Comparison of baseline rate (2017–2018) with rates for 2022–2023 and 2024–2028 (Fisher’s exact or Pearson’s chi-square tests)*
Initiation and Engagement of Alcohol and Other Drug Dependence Treatment (IET)	NQF #0004 NCQA	Engagement: Members who were diagnosed with a new episode of alcohol or drug dependency during the first 10½ months of the measurement year	Engagement: Initiation of treatment and two or more engagement events (inpatient admissions, residential, outpatient visits, intensive outpatient encounters or partial hospitalizations) with any alcohol or drug diagnosis within 34 days after the initiation event	HEDIS data from MCOs	Descriptive statistics; Comparison of percentages between the years; Trend analysis; Comparison of baseline rates (2017–2018) with the rates for 2022–2023 and 2024–2028*
Evaluation Question 6: Does removing payment barriers for services provided in IMDs for KanCare members improve member access to SUD treatment services?					
Evaluation Hypothesis 6: The demonstration will increase the KanCare members’ access to SUD treatment services in IMDs by removing payment barriers for services provided in IMDs.					
Measure Description	Steward	Data Source		Analytic Approach	
Number of IMDs providing SUD services	None	Provider Network reports, Provider licensing data, MCO utilization reports		Descriptive statistics (count)*	
Number of geographic locations by region for SUD treatment in IMDs [^]	None	Network reports, licensing data, utilization reports		Descriptive statistics (count)*	
Number of admissions with SUD treatment services in IMDs	None	KMMS encounter data		Descriptive statistics (count)*	
Average length of stay for SUD treatment services within IMDs	None	KMMS encounter data		Descriptive statistics (average)*	
*Primary analytic method.					
[^] Kansas Department for Children and Families (DCF) regions for SUD treatment in IMDs					

Table 8. Summary of Measures and Analytic Approach for Primary Driver 2 (Outcome Evaluation)

Demonstration Goal 2: *Reduced utilization of emergency departments and inpatient hospital settings for OUD and other SUD treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services.*

Evaluation Question 2: *Does the demonstration decrease the rate of emergency department visits and inpatient hospitalizations related to SUD within the member population?*

Evaluation Hypothesis 2: *The demonstration will decrease the rate of emergency department visits and inpatient hospitalizations related to SUD within the member population.*

Measure Description	Steward	Denominator	Numerator	Data Source	Analytic Approach
ED utilization for SUD per 1,000 Medicaid beneficiaries (CMS Metric #23)	None	Beneficiaries enrolled in Medicaid for at least one month (30 consecutive days) during the measurement period divided by 1,000.	Number of ED visits for SUD during the measurement period	KMMS Encounter data from MCOs; State Medicaid Eligibility and Enrollment data	Descriptive statistics; Comparison of percentages between the years (Fisher’s exact or Pearson’s chi-square tests); Trend analysis (Mantel-Haenszel χ^2); Stratified demographic analysis as per data availability; Comparison of baseline year (2017) with final year (2028) using Pearson’s chi-square tests*
ED utilization for OUD per 1,000 Medicaid beneficiaries (CMS Metric #23, OUD stratum)	None	Beneficiaries enrolled in Medicaid for at least one month (30 consecutive days) during the measurement period divided by 1,000.	Number of ED visits for OUD during the measurement period.	Encounter, eligibility, and enrollment data	Descriptive statistics; Comparison of percentages between the years; Trend analysis; Stratified demographic analysis as per data availability; Comparison of baseline year (2017) with final year (2028)*
Inpatient stays for SUD per 1,000 Medicaid beneficiaries (CMS Metric #24)	None	Beneficiaries enrolled in Medicaid for at least one month (30 consecutive days) during the measurement period divided by 1,000.	Number of inpatient discharges related to a SUD stay during the measurement period.	Encounter, eligibility, and enrollment data	Descriptive statistics; Comparison of percentages between the years; Trend analysis; Stratified demographic analysis as per data availability; Comparison of baseline year (2017) with final year (2028)*
Inpatient stays for OUD per 1,000 Medicaid beneficiaries (CMS Metric #24, OUD stratum)	None	Beneficiaries enrolled in Medicaid for at least one month (30 consecutive days) during the measurement period divided by 1,000.	Number of inpatient discharges related to an OUD stay during the measurement period.	Encounter, eligibility, and enrollment data	Descriptive statistics; Comparison of percentages between the years; Trend analysis; Stratified demographic analysis as per data availability; Comparison of baseline year (2017) with final year (2028)*

*Primary analytic method.

Table 9. Summary of Measures and Analytic Approach for Primary Driver 3 (Outcome Evaluation)

Demonstration Goal 3: Reduction in overdose deaths, particularly those due to opioids.

Evaluation Question 3: Does the demonstration decrease opioid-related overdose deaths?

Evaluation Hypothesis 3: The demonstration will decrease the rate of overdose deaths due to opioids.

Measure Description	Steward	Denominator	Numerator	Data Source	Analytic Approach
Opioid Drug Overdose Deaths. (CMS Metric #27, OUD Stratum)	None	Number of adult beneficiaries enrolled in Medicaid for at least one month (30 consecutive days) during the measurement period.	Number of overdose deaths due to Opioids among eligible beneficiaries	Mortality data (Vital Statistics); KMMS Medicaid Eligibility and Enrollment data	Descriptive statistics; Comparison of percentages between the years; (Fisher's exact or Pearson's chi-square tests); Trend analysis (Mantel-Haenszel χ^2); Comparison of baseline year (2019) rate with demonstration's final year rate (2027) using Fisher's exact or Pearson's chi-square tests*
Use of Opioids at High Dosage in Persons without Cancer per 1,000 Medicaid beneficiaries. (CMS Metric #18)	NQF #29 40 (Adult Core Set) PQA NCQA	Number of adult beneficiaries without cancer divided by 1,000. Note: Hospice patients will be excluded.	Number of beneficiaries with opioid prescription claims with daily dosage greater than 120 morphine milligram equivalents for 90 consecutive days or longer.	KMMS Encounter data from MCOs; HEDIS data from MCOs	Descriptive statistics; Comparison of percentages between the years; Comparison of baseline year (2019) measurement with demonstration's final year measurement (2028)*
Concurrent use of opioids and benzodiazepines per 1,000 Medicaid beneficiaries. (CMS Metric #21)	PQA (Adult Core Set)	Number of adult beneficiaries without cancer divided by 1,000. Note: Excludes patients in hospice care and those with cancer.	Number of beneficiaries with concurrent use of prescription opioids and benzodiazepines for at least 30 days	KMMS Encounter data from MCOs	Descriptive statistics; Trend analysis (Mantel-Haenszel χ^2); Stratified demographic analysis as per data availability; Comparison of baseline year (2020) measurement with demonstration's final year measurement (2028)*

*Primary analytic method.

Table 10. Summary of Measures and Analytic Approach for Primary Driver 4 (Outcome Evaluation)

Demonstration Goal 4: Fewer readmissions to the same or higher level of care where readmissions are preventable or medically inappropriate for OUD and other SUDs.

Evaluation Question 4: Do enrollees receiving SUD services experience reduction in readmissions to the same or higher level of care for OUD and other SUDs?

Evaluation Hypothesis 4: Among members receiving care for SUD, the demonstration will reduce readmissions to the same or higher level of care where readmissions are preventable or medically inappropriate for OUD and other SUDs.

Measure Description	Steward	Denominator	Numerator	Data Source	Analytic Approach
30-Day Readmission for SUD treatment	None	Number of discharges from a residential or inpatient facility for SUD treatment.	Number of discharges with a subsequent admission to a residential or inpatient facility for SUD treatment at the same or higher level of care within 30 days (i.e., inpatient-to-inpatient, inpatient-to-residential, and residential-to-residential)	KMMS Encounter data from MCOs	Descriptive statistics; Comparison of percentages between the years (Fisher’s exact or Pearson’s chi-square tests); Trend analysis (Mantel-Haenszel X^2); Comparison of baseline year (2017) measurement with demonstration’s final year measurement (2028) using Fisher’s exact or Pearson’s chi-square tests*
30-Day Readmission for SUD treatment (among discharges from a residential or inpatient facility for OUD treatment)	None	Number of discharges from a residential or inpatient facility for OUD treatment.	Number of discharges with a subsequent admission to a residential or inpatient facility for SUD treatment at the same or higher level of care within 30 days (i.e., inpatient-to-inpatient, inpatient-to-residential, and residential-to-residential)	KMMS Encounter data from MCOs	Descriptive statistics; Comparison of percentages between the years; Trend analysis; Interrupted Time Series (ITS) design (pre- and post-intervention period comparison) will be done of data as per availability of data*

*Primary analytic method.

Table 11. Summary of Measures and Analytic Approach for Primary Driver 5 (Outcome Evaluation)

Demonstration Goal 5: Improved access to care for physical health conditions among members with OUD or other SUDs.

Evaluation Hypothesis 5: The demonstration will increase the percentage of members with SUD who access care for physical health conditions.

Evaluation Question: Do enrollees receiving SUD services experience improved access to care for physical health conditions?

Measure Description	Steward	Denominator	Numerator	Data Source	Analytic Approach
Annual Dental Visits (ADV) (SUD stratum).	NCQA	Eligible beneficiaries 2–20 years of age with SUD diagnosis enrolled in Medicaid	Number of members 2–20 years of age who had one or more dental visits with a dental practitioner during the measurement year.	HEDIS data from MCOs, KMMS encounter data	Descriptive statistics; Differences between rates tested using Pearson’s chi-square; Trend analysis; Test for equality of relative improvement (a variant of Difference-in-Difference design) using reduction in the failure rate (RFR) between the Intervention Group (members with SUD diagnosis and Comparison Group (members without SUD diagnosis)*
Child and Adolescent Well-Care Visits (WCV) (SUD stratum).	NCQA	Eligible beneficiaries 12–21 years of age with SUD diagnosis enrolled in Medicaid	Number of members 12–21 years of age who had at least one comprehensive well-care visit with a PCP or an OB/GYN practitioner during the measurement year.	HEDIS data from MCOs	Descriptive statistics; Differences between rates tested using Pearson’s chi-square; Trend analysis; ITS design or Test for equality of relative improvement (whichever is appropriate)*
Prenatal and Postpartum Care (PPC) – Timeliness of Prenatal Care (SUD stratum).	NCQA	Number of deliveries with live births for eligible members with SUD diagnosis	Number of deliveries that received a prenatal care visit in first trimester, on or before enrollment start date, or within 42 days of enrollment in the organization.	HEDIS data from MCOs	Descriptive statistics; Differences between rates tested using Pearson’s chi-square; Trend analysis; ITS design or Test for equality of relative improvement (whichever is appropriate)*
Prenatal and Postpartum Care (PPC) – Postpartum Care (SUD stratum).	NCQA	Number of deliveries with live births for eligible members with SUD diagnosis	Number of deliveries that had a postpartum visit on or between 7 & 84 days after delivery.	HEDIS data from MCOs	Descriptive statistics; Differences between rates shown tested using Pearson’s chi-square; Trend analysis; ITS design or Test for equality of relative improvement (whichever is appropriate)*

*Primary analytic method.

Process Evaluation – Secondary Drivers

Table 12. Summary of Measures and Analytic Approach for Secondary Driver 1 (Process Evaluation)					
Secondary Driver 1 (Related to Goal 1): Increase provider and plan capacity to screen/ identify members with SUD for engagement in treatment					
Measure Description	Steward	Denominator	Numerator	Data Source	Analytic Approach
Number of distinct performing providers) using KMAP ID) who billed for Screening, Brief Intervention, and Referral to Treatment (SBIRT) services.	None	NA	Number of distinct performing providers) using KMAP ID) who billed for SBIRT services	KMMS Encounter data from MCOs	Descriptive statistics; Trend analysis (Mantel-Haenszel χ^2); Comparison of baseline year (2019) with final year (2028) using Fisher's exact or Pearson's chi-square tests*
Receipt of care for SUD after SBIRT service – Percentage of beneficiaries who received SBIRT services with evidence of SUD service within 60 days after SBIRT service.	None	Number of beneficiaries who received SBIRT services. (CMS Metric #1)	Number of beneficiaries who received SBIRT services with evidence of SUD service within 60 days after SBIRT service.	KMMS Encounter data from MCOs	Descriptive statistics; Comparison of percentages between the years (Fisher's exact or Pearson's chi-square tests); Trend analysis; ITS design as per availability of data*

*Primary analytic method.

Table 13. Summary of Measures and Analytic Approach for Secondary Driver 2 (Process Evaluation)					
Secondary Driver 2 (Related to Goal 1, Goal 2 and Goal 3): Improve adherence to treatment for OUD and other SUDs					
Measure Description	Steward	Denominator	Numerator	Data Source	Analytic Approach
Continuity of Pharmacotherapy for OUD (POD) – (CMS Metric #22).	NCQA	Number of beneficiaries age 18 to 64 with an OUD diagnosis (excluding adults initiating pharmacotherapy after 6/30/20 and those deliberately phased out of MAT prior to the 180 days).	Number of beneficiaries with at least 180 days of continuous pharmacotherapy with a medication prescribed for OUD without a gap of more than seven days.	KMMS Encounter data from MCOs; HEDIS data from MCOs	Descriptive statistics; Comparison between the years (Fisher's exact or Pearson's chi-square tests); Trend analysis Trend analysis (Mantel-Haenszel χ^2); Interrupted Time Series (ITS) design (pre- & post-intervention period comparison) as per availability of data*
Follow-Up After ED Visit for Alcohol and Other Drug Abuse or Dependence (FUA).	NCQA	ED visits for members ages 13 or older with a principal diagnosis of alcohol or other drug abuse (AOD) or dependence in the measurement year.	A follow-up visit with any practitioner after a principal diagnosis of AOD within 7/30 days of the ED visit.	HEDIS data from MCOs	Descriptive statistics; Comparison between the years; Trend analysis; Comparison of 2017-2018 rates with rates for 2020-2022 and 2024-2028 (Fisher's exact or Pearson's chi-square tests)*

Service Type Strata: *early intervention*, e.g., SBIRT (CMS Metric #7); *outpatient services* (CMS Metric #8); *intensive outpatient and partial hospitalization* (CMS Metric #9); *residential and inpatient services* (CMS Metric #10); *withdrawal management* (CMS Metric #11); *medication-assisted treatment (MAT)* (CMS Metric #12)

*Primary analytic method.

Table 13. Summary of Measures and Analytic Approach for Secondary Driver 2 (Process Evaluation) (Continued)

Secondary Driver 2 (Related to Goal 1, Goal 2 and Goal 3): Improve adherence to treatment for OUD and other SUDs

Measure Description	Steward	Denominator	Numerator	Data Source	Analytic Approach
Percentage of beneficiaries with SUD who used SUD treatment services during the monthly measurement period, stratified by service type.	None	Number of enrollees with a SUD diagnosis (CMS Metric #3).	Number of beneficiaries with a SUD diagnosis who receive any SUD treatment service (CMS Metric #6). Stratified by service type	KMMS Encounter data from MCOs	Descriptive statistics; Comparison of percentages between the years; Trend analysis; ITS design as per availability of data*
Percentage of beneficiaries with OUD diagnosis who used SUD treatment services during the monthly measurement period, stratified by service type.	None	Number of enrollees with an OUD diagnosis (CMS Metric #3, OUD stratum).	Number of beneficiaries with an OUD diagnosis who receive any SUD treatment service (CMS Metric #6; OUD stratum). Stratified by service type	KMMS Encounter data from MCOs	Descriptive statistics; Comparison of percentages between the years; Trend analysis; ITS design as per availability of data*
Percentage of beneficiaries with SUD diagnosis who received peer support services during the monthly measurement period	None	Number of enrollees with a SUD diagnosis (CMS Metric #3).	Number of beneficiaries with a SUD diagnosis who receive peer support service (HCPCTS Codes: H0038, H0038 HQ)	KMMS Encounter data from MCOs	Descriptive statistics; Comparison of percentages between the years; Trend analysis; ITS design as per availability of data*

Service Type Strata: *early intervention*, e.g., SBIRT (CMS Metric #7); *outpatient services* (CMS Metric #8); *intensive outpatient and partial hospitalization* (CMS Metric #9); *residential and inpatient services* (CMS Metric #10); *withdrawal management* (CMS Metric #11); *medication-assisted treatment (MAT)* (CMS Metric #12)

*Primary analytic method.

Table 14. Summary of Measures and Analytic Approach for Secondary Driver 3 (Process Evaluation)

Secondary Driver 3 (Related to Goal 2, Goal 3, and Goal 4): Expand access to medication-assisted treatment (MAT) by ensuring inpatient and residential providers offer or facilitate MAT initialization and treatment.

Measure Description	Steward	Denominator	Numerator	Data Source	Analytic Approach
Residential and Inpatient OUD	None	Number of residential and inpatient discharges for SUD treatment for OUD diagnosis	Number of denominator discharges with MAT claim during the stay or within 15 days of discharge.	MCO Encounter data from MCOs	Descriptive statistics; Comparison of percentages between the years (Fisher's exact or Pearson's chi-square tests); Trend analysis Trend analysis (Mantel-Haenszel χ^2); Comparison of baseline year (2019) with final year (2028) using Fisher's exact or Pearson's chi-square tests*
Percentage of members with OUD diagnosis who have a MAT claim for OUD.	None	Number of members with OUD diagnosis (CMS Metric #3, OUD stratum).	Number of members with a claim for MAT for OUD (CMS Metric #12, OUD stratum).	KMMS Encounter data from MCOs	Descriptive statistics; Comparison of percentages between the years; Trend analysis; ITS design as per availability of data*

*Primary analytic method.

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Table 15. Summary of Measures and Analytic Approach for Secondary Driver 4 (Process Evaluation)

Secondary Driver 4 (Related to Goal 2, Goal 3, and Goal 4): Ensure access to treatment at all needed levels of care for SUD (outpatient and residential treatment including IMD).

Measure Description	Steward	Denominator	Numerator	Data Source	Analytic Approach
Percentage of Medicaid beneficiaries with SUD diagnosis who were treated in an IMD for SUD during the measurement year.	None	Number of beneficiaries with a SUD diagnosis and a SUD-related service during the measurement period and/or in the 12 months before the measurement period (CMS Metric #4).	Number of beneficiaries with a claim for residential treatment in an IMD (CMS Metric #5).	KMMS Encounter data from MCOs	Descriptive statistics; Comparison of percentages between the years (Fisher’s exact or Pearson’s chi-square tests); Trend analysis (Mantel-Haenszel χ^2); Comparison of baseline year (2019) with final year (2028) using Fisher’s exact or Pearson’s chi-square tests*
Average length of stay for SUD treatment services within IMDs (CMS Metric #36).	None	Total number of discharges from an IMD for beneficiaries with a residential treatment stay for SUD.	Total number of days in an IMD for all beneficiaries with an identified SUD.	KMMS Encounter data from MCOs	Descriptive statistics; Comparison of baseline year (2017) with final year (2028)*
Number of beneficiaries in residential and inpatient treatment for SUD per 1,000 members with SUD diagnosis	None	Number of beneficiaries with SUD diagnosis divided by 1,000. (CMS Metric #3)	Total number of beneficiaries in residential and inpatient treatment (refer to CMS Metric #10).	KMMS Encounter data from MCOs	Descriptive statistics; Comparison of percentages between the years; Trend analysis; ITS design as per availability of data*
Number of beneficiaries in outpatient, intensive outpatient, & partial hospitalization SUD treatment per 1,000 members with SUD diagnosis.	None	Number of beneficiaries with SUD diagnosis divided by 1,000. (CMS Metric #3)	Total number of members in outpatient, intensive outpatient or partial hospitalization treatment (refer to CMS Metrics #8 & #9). Note: Partial hospitalization in KS has same service code as inpatient.	KMMS Encounter data from MCOs	Descriptive statistics; Comparison of percentages between the years; Trend analysis; ITS design as per availability of data*

*Primary analytic method.

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Table 16. Summary of Measures and Analytic Approach for Secondary Driver 5 (Process Evaluation)

Secondary Driver 5 (Related to Goal 2, Goal 3, and Goal 4): Ensure inpatient & residential providers improve care coordination & transition of care to the community.

Measure Description	Steward	Denominator	Numerator	Data Source	Analytic Approach
30-Day Readmission for SUD treatment	None	Number of discharges from a residential or inpatient facility for SUD treatment.	Number of discharges with a subsequent admission to a residential or inpatient facility for SUD treatment at the same or higher level of care within 30 days.	KMMS Encounter data from MCOs	Descriptive statistics; Comparison of percentages between the years (Pearson's chi-square tests); Trend analysis Trend analysis (Mantel-Haenszel χ^2); Comparison of baseline year (2017) with final year (2028) using Pearson's chi-square tests*
ED utilization for SUD per 1,000 beneficiaries (CMS Metric #23)	None	Beneficiaries enrolled for at least one month (30 consecutive days) during the measurement period divided by 1,000.	Number of ED visits for SUD during the measurement period	KMMS Encounter data from MCOs	Descriptive statistics; Comparison of percentages between the year; Trend analysis; Comparison of baseline year (2017) with final year (2028)*
ED utilization for OUD per 1,000 beneficiaries (CMS Metric #23, OUD stratum)	None	Beneficiaries enrolled in Medicaid for at least one month (30 consecutive days) during the measurement period divided by 1,000.	Number of ED visits for OUD during the measurement period.	KMMS Encounter data from MCOs	Descriptive statistics; Comparison of percentages between the year; Trend analysis; Comparison of baseline year (2017) with final year (2028)*
Inpatient stays for SUD per 1,000 beneficiaries (CMS Metric #24)	None	Beneficiaries enrolled in Medicaid for at least one month (30 consecutive days) during the measurement period divided by 1,000.	Number of inpatient discharges related to a SUD stay during the measurement period.	KMMS Encounter data from MCOs	Descriptive statistics; Comparison of percentages between the year; Trend analysis; Comparison of baseline year (2017) with final year (2028)*
Inpatient stays for OUD per 1,000 beneficiaries (CMS Metric #24, OUD stratum)	None	Beneficiaries enrolled in Medicaid for at least one month (30 consecutive days) during the measurement period divided by 1,000.	Number of inpatient discharges related to an OUD stay during the measurement period.	KMMS Encounter data from MCOs	Descriptive statistics; Comparison of percentages between the year; Trend analysis; Comparison of baseline year (2017) with final year (2028)*
Follow-Up After ED Visit for Alcohol and Other Drug Abuse/ Dependence (FUA).	NCQA	ED visits for members 13 years or older with a principal diagnosis of alcohol or other drug abuse (AOD) or dependence in the measurement year.	A follow-up visit with any practitioner after a principal diagnosis of AOD within 7/30 days of the ED visit.	HEDIS data from MCOs	Descriptive statistics; Comparison between the years; Trend analysis; Comparison of rate for 2017-2018 with rates for 2020-2022 and 2024-2028 (Fisher's exact or Pearson's chi-square tests)*

*Primary analytic method.

Table 16. Summary of Measures and Analytic Approach for Secondary Driver 5 (Process Evaluation) (Continued)

Secondary Driver 5 (Related to Goal 2, Goal 3, and Goal 4): Ensure inpatient & residential providers improve care coordination & transition of care to the community

Measure Description	Steward	Denominator	Numerator	Data Source	Analytic Approach
Follow-Up After High-Intensity Care for SUD (FUI)	NCQA	Number of inpatient hospitalizations, residential treatment or detoxification visits for a SUD diagnosis among members ages 13 or older	Number of visits or discharges that result in a follow-up visit or service for SUD within 7/30 days	HEDIS data from MCOs	Descriptive statistics; Comparison between the years; Trend analysis; Comparison of baseline rate for the 2019 with the rates for 2020-2022 and 2024-2028*
Initiation & Engagement of Alcohol & Other Drug Dependence Treatment (IET)	NQF #0004 NCQA	Initiation: See above Table B-3 – Primary Driver, Goal 1. Engagement: See Table B-3 – Primary Driver, Goal 1	Initiation: See Table B-3 – Primary Driver 1. Engagement: See Table B-3 – Primary Driver 1.	HEDIS data from MCOs	Descriptive statistics; Comparison between the years; Trend analysis; Comparison of baseline rate for the 2017-2018 with the rates for 2020-2022 and 2024-2028*

*Primary analytic method.

Table 17. Summary of Measures and Analytic Approach for Secondary Driver 6 (Process Evaluation)

Secondary Driver 6 (Related to Goal 2, Goal 3, Goal 4, and Goal 5): Integrate and coordinate physical health and behavioral health services for members with SUD by implementing KanCare program overall care coordination strategy.

Measure Description	Steward	Denominator	Numerator	Data Source	Analytic Approach
Percentage of Medicaid beneficiaries with SUD diagnosis who have an assigned MCO Care Manager	None	Number of Medicaid beneficiaries with SUD diagnosis	Number of Medicaid beneficiaries with SUD diagnosis who have an assigned MCO Care Manager	MCO case management data (available for 2019 onwards)	Descriptive statistics; Comparison between the years (Pearson's chi-square); Trend analysis Trend analysis (Mantel-Haenszel χ^2); One-group Pretest–Posttest Design*
Percentage of Medicaid beneficiaries with SUD diagnosis who have an assigned MCO Care Manager and have service/treatment plan or person-centered service plan (PCSP)	None	Number of Medicaid beneficiaries with SUD diagnosis.	Number of Medicaid Beneficiaries with SUD diagnosis who have an assigned MCO Care Manager and service/treatment plan or PCSP	MCO case management data (available for 2019 onwards)	Descriptive statistics; Comparison between the years; Trend Analysis; One-group Pretest–Posttest Design*

*Primary analytic method.

Qualitative Evaluation

The qualitative evaluation component will focus on qualitative elements related to the goals and hypothesis of the demonstration. These may include examining the experiences of members and providers related to different aspects of care provided through the demonstration, including access to and quality of care.

The qualitative evaluation is designed to complement the quantitative evaluation. While the quantitative data analysis looks at benefits the members may be obtaining from the demonstration strategies and policies directed towards improving their access to appropriate SUD services, the qualitative data analysis is designed to get insights into the impact of the demonstration from members' and providers' perspectives.

The qualitative assessment of the members' perspective will be based on the results obtained from the annual SUD member surveys conducted by MCOs during the demonstration period. The results for applicable survey questions will be reviewed to identify patterns/themes. The information obtained from these patterns/themes will be summarized to provide information regarding the demonstration's impact from the members' perspective. Table 18 lists a few examples of the SUD member survey questions that may be used to assess member feedback.

The qualitative analysis of Kancare provider perspectives regarding the SUD services will be based on the results of online surveys conducted twice during the demonstration period. The survey will include open-ended questions to gather provider feedback on how the demonstration is doing with regard to providing different SUD services. A few examples of draft provider survey questions are listed in Table 18. Final versions of survey questions will be designed by a KFMC committee of subject matter experts. The questionnaire development will include input and approval from the State. Similar to the member surveys, the provider surveys will provide the valuable insights to quantitative evaluation results.

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Table 18. Examples of the Survey Questions for the Qualitative Evaluation – Substance Use Disorder

SUD Member Survey	
Evaluation Topic	Survey Questions (Examples)
Access to care for OUD and other SUDs	• Is the distance you travel to your counselor a problem or not a problem?
	• In the last year, did you need to see your counselor right away for an urgent problem?
	• If you were placed on a waiting list, how long was the wait?
	• How satisfied are you with the time it took you to see someone?
Satisfaction with the SUD treatment services	• Were you seen within 24 hours, 24 to 48 hours, or did you have to wait longer than 48 hours?
	• How satisfied are you with the number of treatment sessions with your counselor?
	• Were you told how many days you were going to stay in this particular treatment facility program?
Medication-Assisted Treatment (MAT)	• How satisfied are you with your discharge plan?
	• Was Medication-Assisted Treatment (MAT) discussed with you at the treatment facility? Medications discussed may have included buprenorphine, methadone, and naltrexone.
Coordination between physical health care and behavioral health care	• If yes, did you then receive Medication-Assisted Treatment (MAT) at the treatment facility or from a provider they referred you to?
	• Thinking about the coordination of all your health care, do you have a primary care provider or medical doctor?
	• Has your counselor asked you to sign a “release of information” form to allow him/her to discuss your treatment with your primary care provider or medical doctor?
SUD Provider Survey	
Evaluation Topic	Survey Questions (Examples)
Type of provider’s service	• How are you involved in providing Substance Use Disorder (SUD) services to KanCare members?
Access to critical levels of care for Opioid Use Disorder (OUD) and other SUDs	• What challenges or barriers did you encounter within the last year in getting KanCare members who are identified as having an OUD or other SUD into the right level of care?
Transitions between levels of care	• Has the use of the SUD-specific Patient Placement Criteria (American Society of Addiction Medicine (ASAM) levels of care Criteria) improved the process of placing members with an SUD in the appropriate level of care?
Medication Assisted Treatment (MAT)	• What are the challenges in meeting licensure and contract requirements for providers of Medication-Assisted Treatments?
	• What challenges you encounter in offering Medication-Assisted Treatment?
	• What challenges you encounter in referring KanCare members with an OUD to a MAT provider?
Coordination between physical health care and behavioral health care	• What has been the impact of case management by MCO staff on coordination of care for physical health or mental health co-morbidities among your KanCare patients with an SUD?
	• In the last 12 months, what successes have you had with coordinating care between physical and behavioral health for your KanCare patients with an SUD?
	• In the last 12 months, what barriers have you had with coordinating care between physical and behavioral health for your KanCare patients with an SUD?
Access to SUD treatment services in IMDs	• What are the challenges in meeting new licensure and contract requirements for providers of SUD services in Institutes of Mental Disorders (IMDs)

F. Evaluation Methodology – Substance Use Disorder

The evaluation design methodologies are designed to meet the standards of scientific rigor that will assist in obtaining statistically valid and reliable evaluation results. The focus of the evaluation is to examine the effectiveness of demonstration strategies and policies on achievement of the overall goal of improving access to appropriate SUD services for KanCare members with SUD.

This section presents the methods and rationale for the demonstration evaluation (quantitative, qualitative, and cross-cutting cost evaluation components). It also describes evaluation questions, evaluation hypotheses, and strategies for each goal of the demonstration. Please note, the measurement years specified here for analyses may change as per data availability at the time of performing interim and final evaluations.

Quantitative Evaluation Methodology

Evaluation Period

January 1, 2024 – December 31, 2028

Study Population

The primary participants (“study population”) for the SUD evaluation is the subset of KanCare members with an SUD diagnosis. In certain cases, members without an SUD diagnosis may access services (e.g., SBIRT or assessment) and will be included within the target population for certain measures or hypotheses.

Data Sources

The following data sources will be utilized for the evaluation (see Table 19). The majority of data will be provided by the KanCare MCOs with additional administrative data from the State of Kansas. Specific datasets and elements for evaluation are discussed with each metric within Sections E and F.

Data Source	Owner/Steward	Brief Description
Healthcare Effectiveness Data and Information Set (HEDIS)	KanCare MCOs	Member-level detail tables for HEDIS measures submitted by the MCOs.
Managed care case management data	KanCare MCOs	Member-level data maintained by MCOs within their specific case management data systems.
Kansas Modular Medicaid System (KMMS) encounter data	KanCare MCOs	Encounter/claims data submitted to the State by MCOs used to support HEDIS and HEDIS-like performance, Medication-Assisted Treatment, service utilization, and cost metrics for all enrollees.
Medicaid eligibility and enrollment files (“834 files”)	State of Kansas	Eligibility and enrollment detail for KanCare members used to determine enrollee aid category and stratify data into subgroups.
Mortality data	State of Kansas	Public health birth, death and other vital records used to track overdose deaths attributed to Kansas residents.
Tennessee HEDIS/CAHPS reports	State of Tennessee	Comparative analysis of audited results from TennCare MCOs.

Source data will be cleaned as appropriate with steps to include reviewing data for missing values, inconsistent patterns, and identification of outliers to ensure quality and appropriateness of data for analyses required by the evaluation design.

Analytic Methods

Due to state-wide implementation of the demonstration, the evaluation of overall strategies and hypotheses is hindered by the lack of true comparison groups, as all KanCare members will be eligible for the same benefits. The **Interrupted Time Series (ITS)** as per availability of data, and **One-Group Pretest-Posttest (OGPP)** evaluation designs will be used throughout the majority of the evaluation. A few performance measures will be assessed by applying **Test for Equality of Relative Improvement** using reduction in the failure rate (RFR) between the Intervention Group, comprised of members with an SUD diagnosis, and the Comparison Group, comprised of members without an SUD diagnosis. The evaluation of the demonstration's strategy of increasing availability of IMD facilities providing SUD services by removal of the Kansas Medicaid IMD Exclusion is limited by data availability; due to changes in data systems, pre-demonstration data will not be available. Therefore, non-experimental methods (descriptive statistics) will be used for conducting the evaluation of this strategy. Specific to cost analyses, the Kansas Medicaid managed care model hinders the ability to investigate costs with the same precision that would be possible in fee-for-service models due to capitation arrangements. Thus, performance measures for the cost analyses will be assessed by examining descriptive statistics, conducting trend analyses, and comparing data for the baseline period with that for the demonstration period.

The primary analytic method for each performance measure is noted in Tables 7–17. These tables also included additional analytic methods that may serve as contingencies should the main analytic method not be feasible. Additional methods may also be considered if there are concerns about the primary approach (these methods cannot be determined until concerns are identified during data review and analysis).

Interrupted Time Series Evaluation Design

The quasi-experimental ITS evaluation design is performed as a continuous series of measurements on a population based on the variable of interest within a treatment or intervention to determine trends "interrupted" by application of the treatment or intervention at those times.^{9,10,11} Depending on the availability of data, ITS evaluation design will be applied for assessing some of the performance measures. As per availability of the data for these measures, the pre-intervention period measurements will be comprised of either six-month data points from 2017 to 2019 and 2022 to 2023 or quarterly data points from 2022 and 2023. The intervention period measurements will be comprised of either quarterly or six-month data points for years 2024–2028.

We will estimate ITS models using the segmented linear regression equation

$$Y_t = \beta_0 + \beta_1 T + \beta_2 X_t + \beta_3 T X_t,$$

where Y_t is the outcome at time t , T represents the time elapsed since the start of the program, β_0 represents the baseline (where $T=0$), X_t is a dummy variable indicating the pre-intervention period, β_1 represents the increment change per time unit before intervention (i.e., baseline trend), β_2 is the level change following the intervention, and β_3 indicates the slope change following the program.¹¹

One Group Pretest-Posttest Evaluation Design

If only one or a few observations are available, but a suitable comparison group is not available, the OGPP non-experimental evaluation design may be used. The OGPP is performed for a single population based on the variable of interest within a treatment or intervention with initial (pre-) and subsequent (post-) measurements.^{9,10} Where possible, the quasi-experimental OGPP with non-equivalent comparison groups will be applied with an appropriate pre- and post-intervention data

for assessing some of the performance measures. The pretest measurement will be taken from 2017–2018 or 2019 and the five-year posttest period will span 2024–2028.

Fisher’s exact and chi-square tests will be used with this design.

Test for Equality of Relative Improvement

When data for both pre- and post-intervention periods for Intervention and Comparison groups are available, then a “*Test for Equality of Relative Improvement*” using reduction in the failure rate (RFR) may be applied. RFR is the amount of improvement relative to the amount of potential improvement. The formula is

$$\text{RFR} = (\text{Remeasurement Rate minus Initial Rate})/(\text{Goal minus Initial Rate}).$$

The Test for Equality of Relative Improvement is a chi-square test that is conceptually similar to the difference-in-differences method that tests for equality of absolute improvement between two groups. The two methods are equivalent when the initial rates are equal. Statistical significance will be indicated by p less than 0.05.

To ensure the intervention and comparison groups are comparable over time, the test for Equality of Relative Improvement will be accompanied by monitoring for changes in the composition of these two groups. The Test for Equality of Relative Improvement may also be used to compare improvements between demographic groups.

Descriptive statistics

Descriptive statistics will be used to describe demographic characteristics of the study population, intervention groups, comparison groups, and any subgroups. Stratified analysis will be performed to evaluate the impact of the demonstration on subpopulations if evidence suggests significant differences may exist. The analyses of various performance measures may include comparison of percentages/rates between the years using Fisher’s exact or Pearson’s chi-square tests; trend analysis using Mantel-Haenszel chi-square; and comparison of baseline measurements with the final year measurements using Fisher’s exact or Pearson’s chi-square tests. These statistical tests’ results will be interpreted with p less than 0.05 indicating statistical significance. As per availability of the data for various performance measures, stratified analyses by demographic groups (e.g., age, sex, race/ethnicity, primary language) will be conducted.

Internal Comparison Population Groups

Potential internal comparison groups can be comprised of key subpopulations based on demographics groups (e.g., age, sex, race/ethnicity, primary language). The comparison of performance measures between different groups of these subpopulations will help in assessing any existing disparities in quality of care and access to SUD treatment services.¹ Estimated counts of the SUD study population, stratified by demographic characteristics, are provided in Table 20. The table shows some strata with counts that may be too low to provide meaningful results—comparisons by race may be limited to White versus Black/African American or White versus non-White, and comparisons by primary language will not be done.

Other potential internal comparison populations for the demonstration may fall along the Kansas population density spectrum (frontier-to-urban) or location of services as availability, and access will likely differ by location in Kansas. For example, methadone treatment requires daily (or near daily)

clinic visits, but methadone clinics may not be accessible in regions of lower population density.¹ Kansas counties are designated to different population density peer groups according to their population relative to their size in persons per square mile (ppsm): Frontier (less than 6.0 ppsm), Rural (6.0–19.9 ppsm), Densely-settled Rural (20.0–39.9 ppsm), Semi-Urban (40.0–149.9 ppsm), and Urban (150.0 ppsm or more).¹² Another potential comparison could be comparing services or providers in different geographic locations, such as comparison between different urban areas offering methadone clinics and likelihood of accepting Medicaid. Non-urban regions will be investigated for their potential to serve as comparison groups to urban regions for select MAT measures.

Table 20. Demographic Stratifications of SUD Study Population – 2023 (estimated)					
Stratum	Count	Percent	Stratum	Count	Percent
Total (denominator)	26,782	100%			
Gender:			Primary Language Spoken:		
Male	15,709	58.7%	English	26,469	98.8%
Female	11,073	41.3%	Not English	313	1.2%
Age:			Ethnicity:		
0 to 17 years	2,609	9.7%	Hispanic or Latino	2,773	10.4%
18 to 24 years	4,774	17.8%	Not Hispanic or Latino	20,140	75.2%
25 to 34 years	5,040	18.8%	Ethnicity Unknown	3,869	14.4%
35 to 44 years	4,784	17.9%	Race:		
45 or older	9,575	35.8%	White, alone	18,735	70.0%
Region:			Black/African American (AA), alone	3,953	14.8%
Urban	14,751	55.1%	Race other than White or Black/AA	490	1.8%
Semi-Urban	4,192	15.7%	White or Black/AA, not alone	2,642	9.9%
Densely settled Rural	5,030	18.8%	Unknown, alone or with a race	962	3.6%
Rural	2,262	8.4%	Members may select multiple races. The strata shown are disjoint.		
Frontier	547	2.0%			

The denominator is the number of KanCare members enrolled in 2023 who had a claim for a service in 2022 or 2023 with a diagnosis in the HEDIS MY 2023 values set Alcohol Abuse and Dependence, Opioid Abuse and Dependence, or Other Drug Abuse and Dependence.

External Comparison Population Groups

Initial analysis to identify potential external (non-Kansas) comparison populations was conducted. To represent what would have happened to members in the intervention group if they had never been exposed to an SUD demonstration, the external comparison group must consist of non-Kansas individuals who are similar to the intervention group in their observable characteristics, not be exposed to the interventions, and be exposed to the same policy environment.² One state without an SUD demonstration, Tennessee, met the criteria used for identifying states with similar Medicaid program characteristics: no Medicaid expansion, similar MCO penetration rates, similar percents of Medicaid beneficiaries with SUD treatment.

Kansas and Tennessee HEDIS rates for selected measures related to behavioral health measures will be trended (from 2017 through 2028, as data allow). If trending graphs show differences that can be attributed to the demonstration with reasonable confidence, then the results will be reported. For this analytic approach to provide meaningful results, Kansas and Tennessee will need to maintain the same policy environments over the years trended. Also, the external comparison group should not be exposed to interventions or conditions impacting the HEDIS rates that are not also applied to the intervention group.

Detailed Description of Quantitative Evaluation Methods

Detailed quantitative methods for evaluating the demonstration's goals and hypothesis are described below.

a. Evaluation Methodology for Substance Use Disorder Goal 1

Goal 1

Increased rates of identification, initiation, and engagement in treatment for OUD and other SUDs.

Evaluation Questions for Goal 1

- Does the demonstration increase access to and utilization of SUD treatment services?
- Does removing payment barriers for services provided in IMDs for KanCare members improve member access to SUD treatment services?

Evaluation Hypotheses for Goal 1

- The demonstration will increase the percentage of members who are referred and engaged in treatment for SUDs.
- The demonstration will increase the KanCare members' access to SUD treatment services in IMDs by removing payment barriers for services provided in IMDs.

Strategies for Goal 1

The strategies contributing to the primary and secondary drivers for Goal 1 will be implemented over the demonstration period:

- Support the expansion of Screening, Brief Intervention, and Referral to Treatment (SBIRT) among physical health and behavioral health service providers to identify members at different risk levels for OUD or other SUDs and provide the appropriate level of referral to SUD providers. This support will be provided by
 - Increasing training opportunities for the physical health and behavioral health service providers to become credentialed to bill for SBIRT services,
 - Working with the MCOs to expand their network of SBIRT-credentialed providers,
 - Working with the MCOs to increase the utilization of SBIRT, and
 - Running a statewide media campaign to increase member and general population awareness of primary prevention and availability of treatment (utilizing funding from the federal State Opioid Response grant).
- Remove the Kansas Medicaid IMD Exclusion, thus allowing IMDs to bill for SUD treatment services, with the expectation that access to SUD services will increase for members with behavioral health conditions.

The strategies described here will contribute to the following three secondary drivers, which in turn will increase the rates of identification, initiation, and engagement in treatment for OUD and other SUDs (Primary Driver 1 for Goal 1):

- Increase provider and plan capacity to screen/identify members with SUD for engagement in treatment (Secondary Driver 1).
- Improve adherence to treatment for OUD and other SUDs (Secondary Driver 2).
- Ensure access to treatment at all needed levels of care for SUD (outpatient and residential treatment including IMD) (Secondary Driver 4).

Drivers and Performance Measures for Goal 1

The evaluation of this goal involves assessment of 12 performance measures for its primary and secondary drivers. The primary and secondary drivers for Goal 1 and their associated performance measures are shown in Table 21.

Table 21. Drivers and Associated Performance Measures for Substance Use Disorder Goal 1	
Primary Driver	Performance Measure
Increase rates of identification, initiation, and engagement in treatment for SUDs	<ul style="list-style-type: none"> Initiation and Engagement of Alcohol and Other Drug Dependence Treatment (IET). (2017–2028)
Secondary Drivers	Performance Measures
Increase provider and plan capacity to screen/identify members with SUD for engagement in treatment [Secondary Driver 1].	<ul style="list-style-type: none"> Number of distinct performing providers (using KMAP ID) who billed for SBIRT services (2019–2028)[†] Receipt of care for SUD and/or OUD after SBIRT service. (2019–2028)*
Improve adherence to treatment for OUD and other SUDs [Secondary Driver 2].	<ul style="list-style-type: none"> Continuity of Pharmacotherapy for OUD (POD). (CMS Metric #22). (2017–2028)* Follow-Up After ED Visit for Alcohol and Other Drug Abuse or Dependence (FUA). (2017–2028) Percentage of beneficiaries with OUD diagnosis who used SUD treatment services during the monthly measurement period, stratified by service type. (2017–2028)*[^] Percentage of beneficiaries with SUD who used SUD treatment services during the monthly measurement period, stratified by service type. (2017–2028).*[^] Percentage of beneficiaries with SUD diagnosis who used SUD peer support services during the monthly measurement period (2017–2028).*
Ensure access to treatment at all needed levels of care for SUD (outpatient and residential treatment including IMD) [Secondary Driver 4].	<ul style="list-style-type: none"> Number of IMDs providing SUD services (2024–2028).[‡] Number of geographic locations of IMDs providing SUD services (by region/county) (2024–2028).[‡] Number of admissions with SUD treatment services in IMDs (2024–2028).[‡] Average length of stay for SUD treatment services within IMDs (2024–2028).[‡]
<p>*As per data availability, Interrupted Time Series Design will be used for the assessment of the performance measure. [^]Service Type Strata: <i>early intervention</i>, e.g., SBIRT (CMS Metric #7); <i>outpatient services</i> (CMS Metric #8); <i>intensive outpatient and partial hospitalization</i> (CMS Metric #9); <i>residential and inpatient services</i> (CMS Metric #10); <i>withdrawal management</i> (CMS Metric #11); <i>medication-assisted treatment (MAT)</i> (CMS Metric #12) [†]Comparison of baseline year measurement with demonstration’s final year measurement will be used for the assessment of the performance measure. [‡]Descriptive data will be used for the assessment of performance measure.</p>	

The comparison of percentages/rates between the years (using Fisher’s exact or Pearson’s chi-square tests) will be conducted for seven performance measures. The trend analysis (using Mantel-Haenszel chi-square) will be done for eight performance measures. As per data availability, stratified analyses by demographic groups will be conducted. Depending on the availability of data, five performance measures will be examined using the interrupted time series design. The post-intervention observation period for all five performance measures will be 2024 through 2028. One process measure will be examined by comparing baseline year measurement for 2017 with demonstration’s final year (2028)

measurement using Fisher's exact or Pearson's chi-square tests. The two HEDIS measures (IET and FUA) will be analyzed in two steps. The first analysis step will include comparison of 2017–2018 rate (baseline) with the 2020–2022 rate; and second step will include comparison of 2023 rate (baseline) with the 2024–2028 rate (please note, there is a break in trending between 2022 and 2023). Non-experimental methods (descriptive statistics) will be used for assessing the four performance measures related to IMDs (listed for the Secondary Driver 4) as pre-demonstration data are not available due to changes in data systems.

b. Evaluation Methodology for Substance Use Disorder Goal 2:

Goal 2

Reduced utilization of emergency departments and inpatient hospital settings for OUD and other SUD treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services.

Evaluation Question for Goal 2

Does the demonstration decrease the rate of emergency department visits and inpatient hospitalizations related to SUD within the member population?

Evaluation Hypothesis for Goal 2

The demonstration will decrease the rate of emergency department visits and inpatient hospitalizations related to SUD within the member population.

Strategies for Goal 2

Four strategies contributing to the Primary and Secondary Drivers for Goal 2 will be implemented over the demonstration period:

- The five Community Crisis Centers (CCCs) across the state became operational in 2019 and provide support and stabilization services for Kansans in crisis and engage with them in community-based services. Early indicators show the Crisis Centers to be effective in diverting members from admission to hospitals and emergency rooms. Groundbreaking on a sixth CCC occurred in late 2019 and it is expected that more CCCs will become operational.
- Expand use of medication-assisted treatment (MAT). This includes
 - Changing licensing requirements for all residential providers, and
 - Coverage of methadone maintenance by Medicaid.
- Expand of the use of peer-supported rehabilitation and recovery services (“peer support services”). This includes
 - Increasing the number of peer mentors credentialed, and
 - Increasing utilization of peer support services.
- Improve transitions between levels of care related to SUD treatment.

The four strategies described here will contribute to the following five secondary drivers, which in turn will reduce the utilization of preventable or medically inappropriate emergency department visits and inpatient hospital admissions related OUD and other SUD (Primary Driver 2 for Goal 2):

- Improve adherence to treatment for OUD and other SUDs (Secondary Driver 2).
- Expand access to MAT by ensuring inpatient and residential providers offer or facilitate MAT initialization and treatment for those who meet the need criteria and choose treatment (Secondary Driver 3).
- Ensure access to services at all needed levels of care for SUD, including outpatient treatment

(group, individual, and/or family counseling, community psychiatric support, crisis intervention), residential treatment (including coverage of SUD treatment in IMDs), and peer support services (Secondary Driver 4).

- Ensure inpatient and residential providers improve care coordination and transition of care to the community (Secondary Driver 5).
- Integrate and coordinate physical health and behavioral health services for members with SUD by implementing KanCare program overall care coordination strategy (Secondary Driver 6).

Drivers and Performance Measures for Goal 2

The evaluation of this goal involves assessment of twenty performance measures for its primary and secondary drivers. The primary and secondary drivers for Goal 2 and their associated performance measures are shown in Table 22. Please note, five measures for assessment of the Goal 2 listed in Table 19 are common between the multiple drivers—four are common across the primary driver and Secondary Driver 5, and one measure is common across Secondary Drivers 2 and 5.

Table 22. Drivers and Associated Performance Measures for Substance Use Disorder Goal 2	
Primary Driver	Performance Measures
Reduce utilization of ED visits and inpatient hospitalizations related to OUD and other SUDs.	<ul style="list-style-type: none"> • ED utilization for SUD per 1,000 Medicaid beneficiaries. (CMS Metric #23; 2017–2028)[†] • ED utilization for OUD per 1,000 Medicaid beneficiaries. (CMS Metric #23, OUD stratum; 2017–2028)[†] • Inpatient stays for SUD per 1,000 Medicaid beneficiaries. (CMS Metric #24; 2017–2028)[†] • Inpatient stays for OUD per 1,000 Medicaid beneficiaries. (CMS Metric #24, OUD stratum; 2017–2028)[†]
Secondary Drivers	Performance Measures
Improve adherence to treatment for OUD and other SUDs [Secondary Driver 2].	<ul style="list-style-type: none"> • Continuity of Pharmacotherapy for OUD (POD). (CMS Metric #22; 2017–2028)* • Follow-Up After ED Visit for Alcohol and Other Drug Abuse or Dependence (FUA). (2017–2028) • Percentage of beneficiaries with OUD diagnosis who used SUD treatment services during the monthly measurement period, stratified by service type. (2017–2028)*^ • Percentage of beneficiaries with SUD who used SUD treatment services during the monthly measurement period, stratified by service type. (2017–2028)*^ • Percentage of beneficiaries with SUD diagnosis who used SUD peer support services during the monthly measurement period. (2017–2028)*
Expand access to medication-assisted treatment (MAT) by ensuring inpatient and residential providers offer or facilitate MAT initialization and Treatment [Secondary Driver 3].	<ul style="list-style-type: none"> • Residential and Inpatient OUD discharges with MAT claim. (2017–2028)[†] • Percentage of members with OUD diagnosis who have a MAT claim for OUD during the measurement period. (2017–2028)*
<p>*Interrupted Time Series Design will be used for the assessment of the performance measure.</p> <p>^Service Type Strata: <i>early intervention</i>, e.g., SBIRT (CMS Metric #7); <i>outpatient services</i> (CMS Metric #8); <i>intensive outpatient and partial hospitalization</i> (CMS Metric #9); <i>residential and inpatient services</i> (CMS Metric #10); <i>withdrawal management</i> (CMS Metric #11); <i>medication-assisted treatment (MAT)</i> (CMS Metric #12).</p> <p>†Comparison of baseline year measurement with demonstration’s final year measurement will be used for the assessment of the performance measure.</p>	

Table 22. Drivers and Associated Performance Measures for Substance Use Disorder Goal 2 (Continued)	
Secondary Driver	Performance Measures
Ensure access to treatment at all needed levels of care for SUD (outpatient and residential treatment including IMD) [Secondary Driver 4].	<ul style="list-style-type: none"> Percentage of Medicaid beneficiaries with SUD diagnosis who were treated in an IMD for SUD during the measurement year. (2019–2028)[†] Average length of stay for SUD treatment services within IMDs. (CMS Metric #36; 2017–2028)[†] Number of beneficiaries in residential and inpatient treatment for SUD per 1,000 members with SUD diagnosis. (2017–2028)* Number of outpatient, intensive outpatient, and partial hospitalization days of SUD treatment per 1,000 members with SUD diagnosis. (2017–2028)* <p>Note: Partial hospitalization in KS has same service code as inpatient.</p>
Ensure inpatient and residential providers improve care coordination and transition of care to the community [Secondary Driver 5].	<ul style="list-style-type: none"> 30-Day Readmission for SUD treatment. (2017–2028)[†] ED utilization for SUD per 1,000 beneficiaries. (CMS Metric #23; 2017–2028)[†] ED utilization for OUD per 1,000 beneficiaries. (CMS Metric #23, OUD stratum; 2017–2028)[†] Inpatient stays for SUD per 1,000 beneficiaries. (CMS Metric #24; 2017–2028)[†] Inpatient stays for OUD per 1,000 beneficiaries. (CMS Metric #24, OUD stratum; 2017–2028)[†] Follow-Up After ED Visit for Alcohol and Other Drug Abuse/Dependence (FUA). (2017–2028) Initiation & Engagement of Alcohol & Other Drug Dependence Treatment (IET). (2017–2028) Follow-Up After High-Intensity Care for SUD (FUI). (2019–2028)
Integrate and coordinate physical health and behavioral health services for members with SUD by implementing KanCare program overall care coordination strategy [Secondary Driver 6].	<ul style="list-style-type: none"> Percentage of Medicaid beneficiaries with SUD diagnosis who have an assigned MCO Care Manager (2019–2028)‡ Percentage of Medicaid beneficiaries with SUD diagnosis who have an assigned MCO Care Manager and have a service/treatment plan or person-centered service plan (PCSP). (2019–2028)‡
<p>*Interrupted Time Series Design will be used for the assessment of the performance measure.</p> <p>[^]Service Type Strata: <i>early intervention</i>, e.g., SBIRT (CMS Metric #7); <i>outpatient services</i> (CMS Metric #8); <i>intensive outpatient and partial hospitalization</i> (CMS Metric #9); <i>residential and inpatient services</i> (CMS Metric #10); <i>withdrawal management</i> (CMS Metric #11); <i>medication-assisted treatment (MAT)</i> (CMS Metric #12).</p> <p>[†]Comparison of baseline year measurement with demonstration’s final year measurement will be used for the assessment of the performance measure.</p> <p>[‡]One-group Pretest-Posttest Design will be used for the assessment of the performance measure.</p>	

The comparison of percentages/rates between the years (using Fisher’s exact or Pearson’s chi-square tests) and trend analysis (using Mantel-Haenszel chi-square) will be conducted for nineteen performance measures. The stratified analyses by demographic groups will be conducted for the performance measures as per data availability. The demonstration’s baseline measurement will be compared with its final year measurement using Fisher’s exact or Pearson’s chi-square tests for eight outcome and process measures. Interrupted time series evaluation design will be used to evaluate seven process measures related to the secondary drivers as per availability of data. The post-intervention observation period for performance measures will be 2024 through 2028. Two process measures will be examined using the One group pretest-posttest design. The post-intervention

observation period for this performance measure will be 2024–2028 (using Fisher’s exact or Pearson’s chi-square tests). Three HEDIS measures (IET, FUA, and FUI) will be analyzed in two steps. For two HEDIS measures (IET and FUA), the first analysis step will include comparison of 2017–2018 rate (baseline) with the 2020–2022; the second step will include comparison of 2023 rate (baseline) with the 2024–2028 (please note, there is a break in trending between 2022 and 2023). For the third HEDIS measure (FUI), the first analysis step will include comparison of 2019 rate (baseline) with the 2020–2022; and second step will include comparison of 2019 rate (baseline) with 2024–2028.

c. Evaluation Methodology for Substance Use Disorder Goal 3:

Goal 3

Reduction in overdose deaths, particularly those due to opioids.

Evaluation Question for Goal 3

Does the demonstration decrease opioid-related overdose deaths?

Evaluation Hypothesis for Goal 3

The demonstration will decrease the rate of overdose deaths due to opioids.

Strategies for Goal 3

Two strategies contributing to the primary and secondary drivers for Goal 3 will be implemented over the demonstration:

- Expansion of medication-assisted treatment (MAT). This includes
 - Changing licensing requirements for all residential providers; and
 - Coverage of methadone maintenance by Medicaid.
- Care coordination requirements by the MCOs to improve transitions to the community and participation in community-based recovery services.

These two strategies will contribute to the following three secondary drivers, which in turn will lead to the reduction in overdose deaths, particularly those due to opioids (Primary Driver 3 for Goal 3):

- Improve adherence to treatment for OUD and other SUDs (Secondary Driver 2).
- Expand access to MAT by ensuring inpatient and residential providers offer or facilitate MAT initialization and treatment for those who meet the need criteria and choose treatment (Secondary Driver 3).
- Ensure inpatient and residential providers improve care coordination and transition of care to the community (Secondary Driver 5).

In addition to the above-mentioned secondary drivers and strategies, the following secondary drivers and their related strategies (described for Goal 2) will also contribute to achieving the Goal 3:

- Ensure access to services at all needed levels of care for SUD, including outpatient treatment (group, individual, and/or family counseling, community psychiatric support, crisis intervention), residential treatment (including coverage of SUD treatment in IMDs), and peer support services (Secondary Driver 3).
- Integrate and coordinate physical health and behavioral health services for members with SUD by implementing KanCare program overall care coordination strategy (Secondary Driver 5).

Drivers and Performance Measures for Goal 3

The evaluation of this goal involves assessment of seventeen performance measures for its primary and secondary drivers. The primary and secondary drivers for Goal 3 and their associated performance measures are shown in Table 20. Please note, one measure for assessment of the Goal 3 listed in Table 23 is common between two secondary drivers (Secondary Drivers 2 and 5).

Table 23. Drivers and Associated Performance Measures for Substance Use Disorder Goal 3	
Primary Driver	Performance Measures
Reduce overdose deaths, especially those due to opioids.	<ul style="list-style-type: none"> • Opioid Drug Overdose Deaths. (CMS Metric #27, OUD Stratum; 2019–2027)[†] • Use of Opioids at High Dosage in Persons without Cancer. (CMS Metric #18; 2019–2028)[†] • Concurrent Use of Opioids and Benzodiazepines. (CMS Metric #21; 2020–2028)[†]
Secondary Drivers	Performance Measures
Improve adherence to treatment for OUD and other SUDs [Secondary Driver 2].	<ul style="list-style-type: none"> • Continuity of Pharmacotherapy for OUD (POD). (CMS Metric #22; 2017–2028)* • Follow-Up After ED Visit for Alcohol and Other Drug Abuse or Dependence (FUA). (2017–2028) • Percentage of beneficiaries with OUD diagnosis who used SUD treatment services during the monthly measurement period, stratified by service type. (2017–2028)*[^] • Percentage of beneficiaries with SUD who used SUD treatment services during the monthly measurement period, stratified by service type. (2017–2028) *[^] • Percentage of beneficiaries with SUD diagnosis who used SUD peer support services during the monthly measurement period. (2017–2028)*
Expand access to medication- assisted treatment (MAT) by ensuring inpatient and residential providers offer or facilitate MAT initialization and Treatment [Secondary Driver 3].	<ul style="list-style-type: none"> • Residential and Inpatient OUD discharges with MAT claim. (2017–2028)[†] • Percentage of members with OUD diagnosis who have a MAT claim for OUD during the measurement period. (2017–2028)*
Ensure inpatient and residential providers improve care coordination and transition of care to the community [Secondary Driver 5].	<ul style="list-style-type: none"> • 30-Day Readmission for SUD treatment. (2017–2028)[†] • ED utilization for SUD per 1,000 beneficiaries (CMS Metric #23). (2017– 2028)[†] • ED utilization for OUD per 1,000 beneficiaries (CMS Metric #23, OUD stratum; 2017–2028)[†] • Inpatient stays for SUD per 1,000 beneficiaries (CMS Metric #24; 2017– 2028)[†] • Inpatient stays for OUD per 1,000 beneficiaries (CMS Metric #24, OUD stratum; 2017–2028)[†] • Follow-Up After ED Visit for Alcohol and Other Drug Abuse or Dependence (FUA). (2017–2028) • Initiation & Engagement of Alcohol & Other Drug Dependence Treatment (IET). (2017–2028) • Follow-Up After High-Intensity Care for SUD (FUI). (2019–2028)
<p>*Interrupted time series design will be used for the assessment of the performance measure. [^]Service Type Strata: <i>early intervention</i>, e.g., SBIRT (CMS Metric #7); <i>outpatient services</i> (CMS Metric #8); <i>intensive outpatient and partial hospitalization</i> (CMS Metric #9); <i>residential and inpatient services</i> (CMS Metric #10); <i>withdrawal management</i> (CMS Metric #11); <i>medication-assisted treatment (MAT)</i> (CMS Metric #12). [†]Assessment will compare the baseline year measurement with demonstration’s final year measurement.</p>	

The comparison of percentages/rates between the years (using Fisher's exact or Pearson's chi-square tests) will be conducted for seventeen performance measures. The trend analysis (using Mantel-Haenszel chi-square) will be done for sixteen performance measures. The stratified analyses by demographic groups will be conducted for the performance measures as per data availability. Interrupted time series evaluation design will be used to evaluate five process measures related to the secondary drivers as per availability of data. The post-intervention observation period for six performance measures will be 2024 through 2028. The baseline measurement will be compared with the demonstration's final year measurement using Fisher's exact or Pearson's chi-square tests for assessment of nine outcome and process measures. Three HEDIS measures (IET, FUA, and FUJ) will be analyzed as described above (see Goal 2).

d. Evaluation Methodology for Substance Use Disorder Goal 4

Goal 4

Fewer readmissions to the same or higher level of care where readmissions are preventable or medically inappropriate for OUD and other SUDs.

Evaluation Question for Goal 4

Do enrollees receiving SUD services experience reduction in readmissions to the same or higher level of care for OUD and other SUDs?

Evaluation Hypothesis for Goal 4

Among members receiving care for SUD, the demonstration will reduce readmissions to the same or higher level of care where readmissions are preventable or medically inappropriate for OUD and other SUDs.

Strategies for Goal 4

Two strategies contributing to the primary and secondary drivers for Goal 4 will be implemented over the demonstration period. The strategies include:

- To ensure admission of members with SUD to the appropriate level of care, documentation of an assessment which follows ASAM criteria will be required.
 - Licensing standards for all providers across the network will be aligned with the ASAM criteria.
- Care coordination requirements will aim to decrease readmission to the same or higher level of care where readmissions are preventable or medically inappropriate for OUD and other SUDs.

The two strategies described here will contribute to the following two secondary drivers, which in turn will lead to the reduced readmissions to the same or higher level of care for OUD and other SUDs (primary driver for Goal 4):

- Ensure access to services at all needed levels of care for SUD, including outpatient treatment (group, individual, and/or family counseling, community psychiatric support, crisis intervention), residential treatment (including coverage of SUD treatment in IMDs), and peer support services;
- Ensure inpatient and residential providers improve care coordination and transition of care to the community;

In addition to the above-mentioned secondary drivers and strategies, the following secondary drivers and their related strategies (described for Goal 2) will also contribute to achieving Goal 4.

- Expand access to MAT by ensuring inpatient and residential providers offer or facilitate MAT initialization and treatment for those who meet the need criteria and choose treatment.

- Integrate and coordinate physical health and behavioral health services for members with SUD by implementing KanCare program overall care coordination strategy.

Drivers and Performance Measures for Goal 4

The evaluation of this goal involves assessment of 13 performance measures for its primary and secondary drivers. The primary and secondary drivers for Goal 4 and their associated performance measures are shown in Table 21. Please note, one measure for assessment of the Goal 4 listed in Table 24 is common between primary and one of the secondary drivers (Secondary Driver 5).

Table 24. Drivers and Associated Performance Measures for Substance Use Disorder Goal 4	
Primary Driver	Performance Measure
Reduce readmissions to the same or higher level of care for OUD and other SUDs.	<ul style="list-style-type: none"> • 30-Day Readmission for SUD treatment. (2017–2028)^ • 30-Day Readmission for SUD treatment (among discharges from a residential or inpatient facility for OUD treatment). (2017–2028)*
Secondary Drivers	Performance Measures
Ensure access to treatment at all needed levels of care for SUD (outpatient and residential treatment including IMD) [Secondary Driver 4].	<ul style="list-style-type: none"> • Percentage of Medicaid beneficiaries with SUD diagnosis who were treated in an IMD for SUD during the measurement year (2019–2028)^ • Average length of stay for SUD treatment services within IMDs (CMS Metric #36; 2017–2028)^ • Number of beneficiaries in residential and inpatient treatment for SUD per 1,000 members with SUD diagnosis. (2017–2028)* • Number of outpatient, intensive outpatient, & partial hospitalization days of SUD treatment per 1,000 members with SUD diagnosis. (2017–2028)* <p>Note: Partial hospitalization in KS has same service code as inpatient.</p>
Ensure inpatient and residential providers improve care coordination and transition of care to the community [Secondary Driver 5].	<ul style="list-style-type: none"> • 30-Day Readmission for SUD treatment. (2017–2028)^ • ED utilization for SUD per 1,000 beneficiaries. (CMS Metric #23; 2017–2028)^ • ED utilization for OUD per 1,000 beneficiaries (CMS Metric #23, OUD stratum; 2017–2028)^ • Inpatient stays for SUD per 1,000 beneficiaries (CMS Metric #24; 2017–2028)^ • Inpatient stays for OUD per 1,000 beneficiaries (CMS Metric #24, OUD stratum; 2017–2028)^ • Follow-Up After ED Visit for Alcohol and Other Drug Abuse/Dependence (FUA). (2017–2028) • Initiation & Engagement of Alcohol & Other Drug Dependence Treatment (IET). (2017–2028) • Follow-Up After High-Intensity Care for SUD (FUI). (2019–2028)
<p>*Interrupted Time Series Design will be used for the assessment of the performance measure. ^Comparison of baseline year measurement with demonstration’s final year measurement will be used for the assessment of the performance measure.</p>	

The comparison of percentages/rates between the years (using Fisher's exact or Pearson's chi-square tests) will be conducted for twelve performance measures. The trend analysis (using Mantel-Haenszel chi-square) will be done for twelve performance measures. The stratified analyses by demographic groups will be conducted for the performance measures as per data availability. Interrupted time series evaluation design will be used to evaluate three outcome and process measures related to the secondary drivers as per availability of data. The post-intervention observation period for three performance measures will be 2024 through 2028. The baseline measurement will be compared with the demonstration's final year measurement using Fisher's exact or Pearson's chi-square tests for the assessment of seven outcome and process measures. Three HEDIS measures (IET, FUA, and FUJ) will be analyzed as described above (see Goal 2).

[e. Evaluation Methodology for Substance Use Disorder Goal 5](#)

Goal 5

Improved access to care for physical health conditions among beneficiaries with OUD or other SUDs.

Evaluation Question for Goal 5

Do enrollees receiving SUD services experience improved access to care for physical health conditions?

Evaluation Hypothesis for Goal 5

The demonstration will increase the percentage of beneficiaries with SUD who access care for physical health conditions.

Strategy for Goal 5

One strategy contributing to the primary and secondary drivers for Goal 5 will be implemented over the demonstration period:

- KanCare contracts with MCOs will focus on the integration of behavioral health and physical health among members with SUDs.
 - Care coordination includes health screening, health risk assessment, needs assessment, and development and implementation of service/treatment plan or person-centered service plan (PCSP).

The strategy described here will contribute to the following secondary driver, which in turn will lead to improved access to care for physical health conditions among members with OUD or other SUDs (primary driver for Goal 5):

- Integrate and coordinate physical health and behavioral health services for members with SUD by implementing KanCare program overall care coordination strategy.

[Drivers and Performance Measures for Goal 5](#)

The evaluation of this goal involves assessment of five performance measures for its primary and secondary drivers. The primary and secondary drivers for Goal 5 and their associated performance measures are shown in Table 25.

Table 25. Drivers and Associated Performance Measures for Substance Use Disorder Goal 5	
Primary Driver	Performance Measures
Improve access to care for physical health conditions among members with OUD or other SUDs.	<ul style="list-style-type: none"> • Annual Dental Visits (ADV). (SUD stratum; 2016–2028)* • Child and Adolescent Well-Care Visits (WCV). (SUD stratum; 2019–2028)^ • Prenatal and Postpartum Care (PPC). (SUD stratum; 2019–2028)^
Secondary Driver	Performance Measure
Integrate and coordinate physical health and behavioral health services for members with SUD by implementing KanCare program overall care coordination strategy [Secondary Driver 6].	<ul style="list-style-type: none"> • Percentage of Medicaid beneficiaries with SUD diagnosis who have an assigned MCO Care Manager (2019–2028)† • Percentage of Medicaid beneficiaries with SUD diagnosis who have an assigned MCO Care Manager and have Service/Treatment plan or PCSP. (2019–2028)†
<p>*Test for Equality of Relative Improvement using reduction in the failure rate (RFR) will be used</p> <p>^Interrupted Time Series Design or Test for Equality of Relative Improvement will be applied as appropriate for the data available for the performance measure.</p> <p>†One-group Pretest-Posttest Design will be used for the assessment of the performance measure.</p> <p>Note: Care Coordination Includes: <i>health screening, health risk assessment, needs assessment and development and implementation of service/treatment plan or person-centered service plan (PCSP)</i></p>	

The comparison of percentages/rates between the years (using Fisher’s exact or Pearson’s chi-square tests) and the trend analysis (using Mantel-Haenszel chi-square) will be done for all five performance measures. The stratified analyses by demographic groups will be conducted for the performance measures as per data availability. For four HEDIS measures (ADV, WCV, PPC – Timeliness of Prenatal Care (SUD stratum), and PPC – Postpartum Care (SUD stratum), the differences between rates, shown as percentage points (pp), will be tested for statistical significance using Pearson’s chi-square. For ADV, a test for equality of relative improvement will be applied using reduction in the failure rate (RFR) between the Intervention Group comprised of members with SUD diagnosis and a Comparison Group comprised of member without SUD diagnosis. To ensure the intervention and comparison groups are comparable over time, the Test for Equality of Relative Improvement will be accompanied by monitoring for changes in the composition of these two groups. For other three HEDIS measures, either Test for Equality of Relative Improvement or Interrupted time series design will be applied as appropriate for the available data. Two measures related the secondary driver will be examined using the one-group pretest-posttest design. The post-intervention observation period for the analysis of both measures will be 2024–2028.

Qualitative Evaluation Methodology

Qualitative data will be obtained from SUD member and provider surveys. The main focus of both qualitative surveys is to gather the information on member and provider experiences related to different aspects of care provided through the demonstration, including access to and quality of care. It should be noted that like most qualitative studies, the statistical-probabilistic generalizability of the findings to the study populations is not an expected feature of SUD member and provider surveys. [13,14](#)

Evaluation Period

January 1, 2024 – December 31, 2028

Study Population

The study population for the member surveys will be KanCare members with SUD diagnosis receiving SUD services. The study population for the provider surveys will be the providers delivering treatment services to members with SUD diagnosis.

Data Sources

Table 26. Data Sources for Qualitative Evaluation – Substance Use Disorder		
Data Source	Owner/Steward	Brief Description
Member survey data	KanCare MCOs	Member responses to questions within MCO-fielded SUD surveys.
Provider Survey data	KFMC	KanCare provider responses resulting from Provider Surveys. Survey questions to be developed by KFMC with State feedback and approval.

SUD Member Survey

The SUD Member Survey has historically been fielded by the MCOs on an annual basis. MCOs will continue to conduct this survey from 2024 to 2028. The data for the survey questions contributing to the assessment of the demonstration’s impact during its five-year implementation period will be analyzed using qualitative data analysis techniques.

The convenience survey methodology applied by the MCOs includes anonymously surveying KanCare members who accessed substance use disorder treatment about their overall satisfaction with their SUD treatment. The surveys are completed at time of service. The package with the instructions on how to administer and return the surveys, as well as printed surveys and prepaid postage envelopes are mailed by the MCOs to the provider groups. The number of mailed surveys in each packet are based on facility volume. The MCOs apply their own process for deciding the number of surveys to be sent to provider groups, but the same letter template is used across the MCOs. Completed surveys are mailed by the provider group to the respective MCO, and survey responses are shared between MCOs for the compilation of the survey results. As mentioned above, the survey results for questions presented that contribute to the assessment of the demonstration’s impact will be reviewed and the patterns/themes will be derived. The information obtained from these patterns/themes will be summarized to provide insights regarding the demonstration’s impact from the members’ perspective.

SUD Provider Survey

KanCare provider feedback and experiences related to SUD services will be gathered through online surveys conducted twice during the demonstration period. The first survey will be conducted in 2026, and the second survey will be conducted in 2028. All KanCare SUD providers that served KanCare members in the respective survey years (identified from KMMS claims files) will be invited to participate in the surveys. These providers will be requested to complete the survey to give feedback on how well the demonstration is doing in providing different SUD treatment services, such as access to needed levels of care, medication assisted treatment, helping with transitions between levels of care, and coordination between physical health care and behavioral health care. The survey will include open-ended questions. Please note, probabilistic-statistical generalizability to the study population will not be the main focus of the survey. Based on the historical experiences from implementing such surveys, it is expected that by inviting all providers in the identified study population, the recurring experiences,

ideas, or opinions expressed by those completing the open-ended survey questions allows the identification of patterns and themes for deeper insights beyond numerical data.

The surveys will be conducted using appropriate software (such as Microsoft Forms). Letters and emails containing a link and QR code will be sent to the providers for online completion of the survey. A follow-up reminder postcard/email will also be sent. The number of completed surveys will be tracked during survey implementation using the software system's tracking tools. After survey closing dates, data will be retrieved from the software system, reviewed, and the patterns/themes will be derived. The information obtained from these patterns/themes will be summarized to provide insights regarding the demonstration's impact from the providers' perspective.

Analytic Methods

Qualitative data analysis techniques will be used to analyze data collected through the member and provider surveys. Data from member and provider surveys will be analyzed through theming and descriptive statistics, where appropriate. Research and professional ethics (informed consent, risk minimization, confidentiality, etc.) will be adhered to for all qualitative research.

The steps for qualitative data analysis will include

- Getting familiar with the data by looking for common observations and patterns;
- Developing a coding framework to identify broad ideas, concepts, behaviors, or phrases;
- Assigning codes for structuring and labeling data;
- Identifying themes, patterns, and connections to answer research questions; and
- Summarizing the qualitative information to add to the overall evaluation results.

Cost Evaluation Methodology

The investigation of costs is a separate but cross-cutting element of the SUD component of the demonstration evaluation. Cost studies investigate both granular (i.e., specific treatment costs) and macro aspects of the KanCare unique to the demonstration. The demonstration is designed to maintain budget neutrality while improving the effectiveness of services delivered to the Medicaid population. The intent of cost studies is not to identify statistically significant increases or decreases in program costs but to understand how spending within different categories may contribute to enhanced program effectiveness. This is, in large part, due to how Medicaid managed care capitation payments obscure true administrative spending versus a fee-for-service paradigm.

Cost Evaluation Goal, Question, and Hypothesis

Goal for Cost Evaluation

Improved impact of the KanCare program via provision of a full continuum of services for SUD treatment to members.

Cost Evaluation Question

Does the demonstration maintain or decrease total KanCare SUD expenditures?

Cost Evaluation Hypothesis

The demonstration will maintain or decrease total KanCare SUD expenditures.

Demonstration Strategies' Relationship to the Cost Evaluation

Each of the strategies within the Evaluation Methodology – Substance Use Disorder section that support

the primary and secondary drivers are also utilized in the investigation of program costs. The outcomes of these strategies are anticipated to contribute to enhanced program efficiency and effectiveness. Enhancements to efficiency may include reductions to admissions (or readmissions) and other burdens related to treatment of preventable or medically inappropriate encounters as well as any other outcomes which reduce unnecessary utilization or duplication of efforts. This may also shift costs associated with the transition from formal treatment to community recovery services.

Study Population

The study population for the cost measures will include KanCare members with a SUD diagnosis and a SUD treatment during the measurement period or in the 12 months before the measurement period (based on paid claims).

Evaluation Period

2017–2028 will be the evaluation period.

Analytic Plan

Cost measures will be trended across three time periods: 2017–2019 baseline, 2022–2023 post COVID–19, and 2024–2028 demonstration years. The slopes of trendlines will be calculated. Costs may be adjusted for inflation using national inflation rates or by recalculating costs based on the Kansas Medicaid fee schedule for a fixed year.

Cost Evaluation Measures

The cost evaluation measures are stratified in two interrelated categories of cost drivers, both expressed in terms of dollars per member per month (\$PMPM):

- Type-of-Care Cost Drivers (Table 27) – treatment costs for members with SUD diagnosis, stratified by types of care using claims data
- Diagnosis and Treatment Cost Drivers (Table 28) – treatment costs for members, stratified by services rendered within or not within IMDs, and other SUD-related costs for members with and without SUD diagnoses

Note, the State tracks administrative costs for the entire Kansas Medicaid program but does not allocate costs specific to the 1115 demonstration. Similarly, managed care administrative expenses are not tracked specifically to the 1115 demonstration within KanCare. Thus, due to unavailability of data, the category Total KanCare SUD Costs (treatment costs from the cost drivers listed above as well as administrative costs associated with the demonstration) will not be studied.

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Table 27. Type-of-Care Cost Drivers

Measure Description	Numerator and Denominator Specification
ED Outpatient SUD spending during the measurement period. Expressed in dollars per member per month (\$PMPM).	<p>Numerator: Spending on SUD treatment services in emergency department (ED) outpatient settings during the measurement period. (CMS Metric #28, outpatient ED stratum)</p> <p>Denominator: Number of beneficiaries with a SUD diagnosis and a SUD treatment during the measurement period and/or in the 12 months before the measurement period. (CMS Metric #4, paid claims only)</p>
Non-ED Outpatient SUD spending during the measurement period. (\$PMPM)	<p>Numerator: Spending on SUD treatment services and peer support in non-ED outpatient settings during the measurement period. (CMS Metric #28, non-ED outpatient stratum)</p> <p>Denominator: Number of beneficiaries with a SUD diagnosis and a SUD treatment during the measurement period and/or in the 12 months before the measurement period. (CMS Metric #4, paid claims only)</p>
Inpatient and residential SUD spending during the measurement period. (\$PMPM)	<p>Numerator: Spending on SUD treatment services in inpatient and residential settings during the measurement period. (CMS Metric #28, inpatient stratum)</p> <p>Denominator: Number of beneficiaries with a SUD diagnosis and a SUD treatment during the measurement period and/or in the 12 months before the measurement period. (CMS Metric #4, paid claims only)</p>
Pharmacy SUD spending during the measurement period. (\$PMPM)	<p>Numerator: Spending on SUD pharmaceuticals during the measurement period. (CMS Metric #28, pharmaceutical stratum)</p> <p>Denominator: Number of beneficiaries with a SUD diagnosis and a SUD treatment during the measurement period and/or in the 12 months before the measurement period. (CMS Metric #4, paid claims only)</p>
Total KanCare SUD treatment spending on beneficiaries with SUD diagnosis during the measurement period. (\$PMPM)	<p>Numerator: The sum of all Medicaid spending on SUD treatment and peer support services during the measurement period. (CMS Metric #28)</p> <p>Denominator: Number of beneficiaries with a SUD diagnosis and a SUD treatment during the measurement period and/or in the 12 months before the measurement period. (CMS Metric #4, paid claims only)</p>

Table 28. Diagnosis and Treatment Cost Drivers	
Measure Description	Numerator and Denominator Specification
SUD spending on inpatient/residential services and pharmaceuticals within IMDs during the measurement period. Expressed in dollars per member per month (\$PMPM). [CMS Metric #31]	Numerator: Spending on treatment or peer support for SUD within IMDs during the measurement period. (CMS Metric #29, exclude room and board)
	Denominator: Number of beneficiaries with a claim for treatment or peer support for SUD in an IMD during the reporting year. (CMS Metric #5, paid service or pharmacy claims only)
SUD spending on services other than within IMDs during the measurement period. (\$PMPM) [CMS Metric #30]	Numerator: Spending on SUD treatment or peer support services <i>not within IMDs</i> during the measurement period. (CMS Metric #28, non-IMD stratum)
	Denominator: Number of beneficiaries with a SUD diagnosis and a SUD treatment or peer support during the measurement period and/or in the 12 months before the measurement period. (CMS Metric #4, paid claims only, non-IMD stratum)
SUD spending on SBIRT services for beneficiaries without SUD diagnosis during the measurement period. (\$PMPM)	Numerator: Spending on SUD <i>Screening, Brief Intervention, and Referral to Treatment</i> (SBIRT) for beneficiaries <i>without a SUD diagnosis and not within IMDs</i> during the measurement period. (CMS Metric #28, non-IMD and non-SUD diagnosis strata)
	Denominator: Number of beneficiaries without SUD diagnosis but with a SUD treatment during the measurement period and/or in the 12 months before the measurement period. (CMS Metric #4, paid claims only, non-IMD stratum)
SUD spending on assessment services for beneficiaries without SUD diagnosis during the measurement period. (\$PMPM)	Numerator: Spending on SUD assessment for beneficiaries <i>without a SUD diagnosis and not within IMDs</i> during the measurement period. (CMS Metric #28, non-IMD and non-SUD diagnosis strata)
	Denominator: Number of beneficiaries without SUD diagnosis but with a SUD treatment during the measurement period and/or in the 12 months before the measurement period. (CMS Metric #4, paid claims only, non-IMD stratum)
Total KanCare SUD treatment spending during the measurement period. (\$PMPM)	Numerator: The sum of all Medicaid spending on SUD treatment, SBIRT, assessment, and peer support services during the measurement period. (CMS Metric #28, includes non-SUD diagnosis stratum)
	Denominator: Number of beneficiaries who received SUD treatment, SBIRT, assessment, or peer support services during the measurement period and/or in the 12 months before the measurement period. (CMS Metric #4, paid claims only, includes non-SUD diagnosis stratum)

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G. Methodological Limitations – Substance Use Disorder

Evaluation Design Limitations

The demonstration evaluation has a strong reliance upon quasi-experimental ITS, and the Test for Equality of Relative Improvement, as well as non-experimental OGPP designs. Therefore, the resultant pre- and post-test evaluation design or comparisons to baselines may not imply causality due to a specific intervention. Further, the reliance upon non-experimental methods for the SUD component's demonstration hypothesis will inhibit interpretations and conclusions from investigation in changes to Kansas' IMDs. Lastly, the Kansas Medicaid managed care model hinders the ability to investigate costs with the same precision that would be possible in fee-for-service models due to capitation arrangements. Every attempt to ensure quality data and analysis will be made for observed limitations to the evaluation design.

Study Population Limitations

As noted previously, the lack of true comparison groups due to state-wide implementation is a major limitation in evaluating the demonstration in the SUD component. Potential internal comparison groups are also limited in their ability to generalize to the study population. Choices of external comparison groups are limited to states without SUD 1115 Demonstrations that have similar beneficiary characteristics and Medicaid programs as Kansas (e.g., non-Medicaid expansion, similar MCO penetration rates, SUPPORT Act and other opioid disaster response interventions, SUD provider availability). Changes to the beneficiary characteristics or Medicaid programs of the comparison state during the demonstration period will further affect comparability.

When available, subgrouping of members within a strategy's target population will be performed. Therefore, there is a possibility of encountering methodological issues that will require application of appropriate techniques. Methodological issues may include selection bias (e.g., differences between those who may opt-in versus those who may not); spillover effects; multiple treatment threats due to other interventions; effect of confounding variables; inadequate statistical power; and other issues inherent within experimental comparisons and inferences. Appropriate techniques will be applied to address these issues as much as possible.

Over the five-year period, eligibility for receiving Medicaid services may change for some members and they may not be part of intervention or comparison groups. Additionally, the SUD diagnosis status of members may change over time, and certain members may receive SBIRT or assessments even without diagnosis. These issues will be monitored and addressed accordingly by applying appropriate techniques (intent-to-treat analysis; exclusion from analysis, etc.).

Data Source Limitations

The use of administrative claims and encounters data sources for performance measures can be a limitation when used to determine changes in access to services, quality of care, and health outcomes. However, many of the performance measures are validated and stewarded by nationally recognized bodies such as NCQA and widely used for these purposes. While administrative data may identify key cases and statistical trends in performance, these are usually limited in providing detailed health and health behavior information, thus making it difficult to obtain information on possible covariates influencing performance.

Data lag for some data sources (e.g., mortality rates) also causes a challenge in measuring and reporting change in a timely manner. This can affect the availability of data for conducting the evaluation for the entire evaluation period of the demonstration.

As the evaluation is based on a 12-year period (2017–2028), the definitions and specifications of the evaluation measures, policies for data collection, and infrastructure of the data sources may change during the evaluation period following administrative rule or other policy changes, thus leading to unavailability of appropriate data for the analysis of multiple pre- and post- intervention evaluation points needed for comparative interrupted time series and one-group pretest-posttest designs.

An additional challenge specific to cost data is inflation. General rising healthcare costs will impact trending of claim payments. Adjusting costs rates using national inflation rates may be possible. Calculating expenditures based on the Medicaid fee schedule for a specific year may also mitigate this challenge.

From a qualitative perspective, limitations may exist in the collection and coding of open-ended questions and comments. These include limitations to the accuracy and precision of data obtained through primary data collection as well as the extent to which interpretations and conclusions may be made. As the SUD member satisfaction surveys are administered independently by each MCO using a convenience survey methodology, the results are not generalizable to the study population. Also, the analysis across the KanCare program may not be feasible if survey designs, or fielding, differ significantly between one or more of the MCOs. The results of the SUD provider surveys may not be generalizable to the study population due to low response rates. Also, the open-ended responses may not clearly communicate the respondent's intended message.

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H. Attachment – Independent Evaluator

KDHE has arranged to contract with the Kansas External Quality Review Organization (EQRO), KFMC Health Improvement Partners (KFMC), to conduct the evaluation of the KanCare Section 1115(a) Demonstration's components—the maintenance of 12-month continuous eligibility for parents and caretakers and the Substance Use Disorder demonstration. They have agreed to conduct the demonstration components' evaluation in an independent manner. KFMC has over 52 years of demonstrated success in carrying out both Federal and State healthcare quality related contracts. They have provided healthcare quality improvement, program evaluation, review, and other related services including the following:

- Kansas Medicaid Managed Care EQRO since 1995 (29 years).
- CMS quality improvement organization (QIO) or QIO-Like entity since 1982 (42 years).
- Utilization Review/Independent Review Organization for the Kansas Insurance Department since 2000 (24 years) and for seven other states.

KFMC is accredited as an Independent Review Organization (IRO) through URAC (formerly known as the Utilization Review Accreditation Commission). The URAC Accreditation process is a rigorous, independent evaluation, ensuring that organizations performing IRO services are free from conflicts of interest and have established qualifications for reviewers. KFMC considers ethics and compliance an integral part of all their business decisions and the services they provide. The KFMC Corporate Compliance Program supports the commitment of KFMC to conduct its business with integrity and to comply with all applicable Federal and State regulations, including those related to organizational and personal conflicts of interest. The KFMC compliance program ensures potential, apparent, and actual organizational and personal conflicts of interest (PCI) will be identified, resolved, avoided, neutralized, and/or mitigated.

Prior to entering into any contract, KFMC evaluates whether the identified entity or the work presents an actual, potential, or apparent organizational conflict of interest (OCI) with existing KFMC contracts. KFMC will not enter into contracts that are an OCI. If it is undetermined whether the new work could be a conflict of interest with their EQRO and independent evaluation responsibilities, KFMC will discuss the opportunity with KDHE, to determine whether a conflict would exist. In some cases, an approved mitigation strategy may be appropriate.

All Board members, managers, employees, consultants, and subcontractors receive education regarding conflicts of interest and complete a CMS developed PCI Disclosure Form. Disclosures include the following:

- Relationships with insurance organizations or subcontractor of insurance organizations
- Relationships with providers or suppliers furnishing health services under Medicare
- Financial interests in health care related entities
- Investments in medical companies, healthcare, or medical sector funds
- Governing body positions

H. Attachment (Continued) – Timeline and Major Milestones

Timeline for Evaluation and Major Milestones for the KanCare Section 1115(a) Demonstration

The timelines and major milestones for the two evaluation components of the KanCare Section 1115(a) Demonstration are described in Table 29 and Table 30.

Evaluation Activity and Major Milestone	Due Date
Finalize technical specifications for study population and performance measures.	December 2025
Provide updates during routine quarterly EQRO/State/MCO meetings to review and discuss data sources, reports, and findings as applicable.	Quarterly (already in progress)
Qualitative Member Survey, and MCOs and State Staff Questionnaire: <ul style="list-style-type: none"> Member Surveys: Conduct online survey and analyze data. MCOs and State Staff Questionnaire: Collect and analyze data. 	<ul style="list-style-type: none"> Data collection on quarterly basis during 2026, 2027 and 2028; Data analysis in 2029. Data collection during 2026, 2027 and 2028; Data analysis in 2029.
Draft Interim Evaluation Report in accordance with Attachment B (Preparing the Evaluation Report) of the Demonstration’s STCs; Report will present and discuss evaluation findings to date.	December 2027 (one year prior to the end of the demonstration, or with renewal application)
Revised Interim Evaluation Report	60 days after receipt of CMS comments
Draft Summative Evaluation Report in accordance with Attachment B of the Demonstration’s STCs.	June 2030 (18 months from the end of the demonstration)
Revised Summative Evaluation Report.	60 calendar days after receipt of CMS comments

Evaluation Activity and Major Milestone	Due Date
Finalize technical specifications for study population and performance measures.	December 2025
Provide updates during routine quarterly EQRO/State/MCO meetings to review and discuss data sources, reports, and findings as applicable.	Quarterly (already in progress)
Qualitative surveys: <ul style="list-style-type: none"> Provider Surveys: Conduct online surveys and analyze data SUD Member Satisfaction Surveys (conducted by MCOs): Analyze data from annual surveys 	<ul style="list-style-type: none"> Provider Surveys: June 2026 (for Interim evaluation); and September 2028 (for Summative evaluation) Member Surveys: After receipt of the survey reports from MCOs.
Draft SUD Mid-point Assessment Report to the State	December 31, 2026
SUD Mid-point Assessment Report to CMS	March 1, 2027 (No later than 60 calendar days after December 31, 2026.)
Revised SUD Mid-point Assessment	60 days after receipt of CMS comments
Draft Interim Evaluation Report in accordance with Attachment B (Preparing the Evaluation Report) of the Demonstration’s STCs; will present and discuss evaluation findings to date.	December 2027 (one year prior to the end of the demonstration, or with renewal application)
Revised Interim Evaluation Report	60 days after receipt of CMS comments
Draft Summative Evaluation Report in accordance with Attachment B of the Demonstration’s STCs.	June 2030 (18 months from the end of the demonstration)
Revised Summative Evaluation Report.	60 calendar days after receipt of CMS comments

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