Medicaid Section 1115 Substance Use Disorder Demonstrations Monitoring Report Template

Note: PRA Disclosure Statement to be added here

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

The title page is a brief form that the state completed as part of its monitoring protocol. The title page will be populated with the information from the state's approved monitoring protocol. The state should complete the remaining two rows. Definitions for certain rows are below the table.

State	Montana
Demonstration name	Healing and Ending Addiction through Recovery and Treatment Demonstration
Approval period for section 1115 demonstration	07/01/2022-06/30/2027
SUD demonstration start date ^a	07/01/2022
Implementation date of SUD demonstration, if different from SUD demonstration start date ^b SUD (or if broader demonstration, then SUD -related) demonstration goals and objectives	 07/01/2022 Increased rates of identification, initiation, and engagement for SUD; Increased adherence to and retention in treatment; Reductions in overdose deaths, particularly those due to Opioids; Reduced utilization of emergency departments 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 readmission is preventable or medically inappropriate; and Improved access to care for physical health conditions among beneficiaries with SUD
SUD demonstration year and quarter	SUD DY1Q1 monitoring report
Reporting period	07/01/2022-9/30/2022

^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. 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. Executive summary

The executive summary should be reported in the fillable box below. It is intended for summarylevel information only. The recommended word count is 500 words or less.

The Healing and Ending Addiction through Recovery and Treatment (HEART) demonstration waiver is a critical component support the expansion of Montana's behavioral health continuum of care. The state is committed to expanding coverage and access to prevention, crisis intervention, treatment, and recovery services through the HEART Initiative. The State did not propose changes to Medicaid eligibility standards with this waiver. The State applied for the waiver to authorize additional health care services to Medicaid beneficiaries, ages 18 to 64 years old with a substance use disorder (SUD) or severe mental illness (SMI).

The approval of the waiver on July 1, 2022, authorized expenditure authority allowing federal reimbursement for Medicaid services provided to short-term residents of Institutions of Mental Disease (IMD) obtaining treatment for SUD. During Demonstration Year 1, quarter 1 Montana has seen two facilities provide treatment under this authority:

- Rimrock is in Billings, MT. Their facility is licensed for 40 residential beds (ASAM 3.5 Clinically Managed High Intensity Residential Services).
- Badlands Treatment Center is in Glendive, MT. This facility is licensed for 32 residential beds (ASAM 3.5 Clinically Managed High Intensity Residential Services).

During the remainder of Demonstration Year 1, DPHHS is seeking to add new Medicaid Services which include:

- Contingency Management;
- Tenancy support services; and
- Targeted re-entry services to be provided to justice-involved individuals from Montana State prisons.

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

Promp	ot	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
1.	Assessment of need and qualification for SUD se	ervices		
1.1	Metric trends			
1.1.1	The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to assessment of need and qualification for SUD services.		Metric #5: Medicaid Beneficiaries Treated in an IMD for SUD	The state saw 86 individuals served in SUD IMDs in DY1, Q1. The state did not have a waiver prior to July 1, 2022, so individuals served in SUD IMDs were private pay or commercial insurance.
1.2	Implementation update	·		
1.2.1	Compared to the demonstration design and operational details, the state expects to make the following changes to: 1.2.1.a The target population(s) of the	Х		*EXAMPLE: The state is expanding the clinical criteria to include # diagnoses
	demonstration1.2.1.bThe clinical criteria (e.g., SUD diagnoses) that qualify a beneficiary for the demonstration	X		*EXAMPLE: The state projects an #% increase in beneficiaries with a SUD diagnosis due to an increase in the FPL limits which will be effective on MM/DD/YYYY.
1.2.2	The state expects to make other program changes that may affect metrics related to assessment of need and qualification for SUD services.	Х		

Promj	pt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
2.	Access to Critical Levels of Care for OUD and	other SUDs (Miles	stone 1)	
2.1	Metric trends			
2.1.1	The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 1.		Metric #13: SUD Provider Availability	The state saw an addition of 32 licensed ASAM 3.5 beds during DY1, Q1. These beds are in an IMD facility that opened in September 2022.
2.2	Implementation update	I		1
2.2.1	Compared to the demonstration design and operational details, the state expects to make the following changes to: 2.2.1.a Planned activities to improve access the SUD treatment services across the continuum of care for Medicaid beneficiaries (e.g., outpatient services, intensive outpatient services, medication-assisted treatment, service in intensive residential and inpatient settings, medically supervised withdrawal management)			The state adopted administrative rules to align licensing regulations with the ASAM Criteria. This included the addition of ASAM 3.2-WM and ASAM 3.3. The state also adopted administrative rules streamlining the state approval process for SUD programs, which is required for Medicaid enrollment. These rules make it easier for Individual Licensed Addictions Counselors to be approved and enroll in Medicaid. The state also adopted administrative rules restructuring our crisis system, which allowed for services mirrored between Medicaid and Non-Medicaid. Part of this change was the addition of Crisis Receiving programs in both Medicaid and Non-Medicaid.
	2.2.1.b SUD benefit coverage under the Medicaid state plan or the Expenditure Authority, particularly for residential treatment, medically supervised withdrawal management, and medication-assisted treatment services provided to individual IMDs			The state submitted an amended state plan to add ASAM 3.1, ASAM 3.2-WM, and ASAM 3.3 to provide MT with all levels of care described in the ASAM Criteria. Reimbursement for ASAM 2.1 - ASAM 3.7 are bundled rates based on staffing and service requirements found in the ASAM Criteria. The state also added Crisis Receiving as a service to the state plan.

Prompt		State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
2.2.2	The state expects to make other program changes that may affect metrics related to Milestone 1.	Х		

Prompt		State has no trends/update to report Related metric(s (place an X) (if any)		State response
3.	Use of Evidence-based, SUD-specific Patient Pla	cement Criteria ((Milestone 2)	
3.1	Metric trends			
3.1.1	The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 2.		Metric Q3: How is information technology being used to effectively monitor "recovery" supports and services for individuals identified with SUD?	The state saw 78 prior authorizations in August and 42 prior authorizations in September 2022 for ASAM 3.1. Prior authorizations were reinstated August 1, 2022 for this SUD level of care. The state saw 491 prior authorizations in August and 467 prior authorizations in September 2022 for ASAM 3.5. this is a 5% decrease in the number of prior authorizations despite the approval of SUD IMD reimbursement.
3.2.	Implementation update			
3.2.1	Compared to the demonstration design and operational details, the state expects to make the following changes to: 3.2.1.a Planned activities to improve providers' use of evidence-based, SUD-specific placement criteria	X		
	3.2.1.b Implementation of a utilization management approach to ensure (a) beneficiaries have access to SUD services at the appropriate level of care, (b) interventions are appropriate for the diagnosis and level of care, or (c) use of independent process for reviewing placement in residential treatment settings			MT reinstated prior authorization requirements for ASAM 3.5 June 1, 2022, which was prior to the approval of the waiver. MT reinstated prior authorization requirements for the following services effective August 1, 2022: Therapeutic Group Homes, behavioral health Group Homes, Program of Assertive Community Treatment, Transcranial Magnetic Stimulation, Crisis Stabilization, and ASAM 3.1. These requirements were suspended during the PHE.

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

Promp	t	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
4.	Use of Nationally Recognized SUD-specific Prog (Milestone 3)	· · · · ·	× • /	-
4.1	Metric trends			
4.1.1	The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 3.	X		
Milesto reportin	There are no CMS-provided metrics related to one 3. If the state did not identify any metrics for ng this milestone, the state should indicate it has no to report.			
4.2	Implementation update			
4.2.1	Compared to the demonstration design and operational details, the state expects to make the following changes to: 4.2.1.a Implementation of residential treatment provider qualifications that meet the ASAM Criteria or other nationally recognized, SUD-specific program standards			The state adopted administrative rules to align licensing regulations with the ASAM Criteria. All SUD residential facilities must be licensed by the Office of Inspector General to be state approved and enrolled in Medicaid.
	4.2.1.b Review process for residential treatment providers' compliance with qualifications	X		The state's OIG oversees licensing for SUD residential facilities.

Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
4.2.1.c Availability of medication-assisted treatment at residential treatment facilities, either on-site or through facilitated access to services off si			The state amended state approval rules that added language requiring state approved SUD programs to ensure clients receiving prescribed medication(s), including medication for opioid use disorder, are not required to discontinue the medication as a condition for receiving services. Access to, and coordination with, qualified medical providers must be made available on- site or through referral.
4.2.2 The state expects to make other program chat that may affect metrics related to Milestone 3	-		

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

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

Promp	ot	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
7.	Improved Care Coordination and Transitions be	etween Levels of	Care (Milestone 6)	
7.1	Metric trends			
7.1.1	The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 6.	Х		
7.2	Implementation update			
7.2.1	Compared to the demonstration design and operational details, the state expects to make the following changes to: Implementation of policies supporting beneficiaries' transition from residential and inpatient facilities to community- based services and supports.			The state's OIG added a rule requiring care management to be available and provided by all licensed SUD facilities. The state added care management as an available service component in all SUD bundled services under Medicaid.
7.2.2	The state expects to make other program changes that may affect metrics related to Milestone 6.	Х		

Prompt			State has no trends/update to reportRelated metric((place an X)		State response
8.	SUD hea	alth information technology (health IT)			
8.1	Metric t	rends			
8.1.1	including	e reports the following metric trends, g all changes (+ or -) greater than 2 elated to its health IT metrics.	X		
8.2	Impleme	entation update			
8.2.1	operation	ed to the demonstration design and nal details, the state expects to make the g changes to: How health IT is being used to slow down the rate of growth of individuals identified with SUD	X		
	8.2.1.b	How health IT is being used to treat effectively individuals identified with SUD	X		
	8.2.1.c	How health IT is being used to effectively monitor "recovery" supports and services for individuals identified with SUD	X		
	8.2.1.d	Other aspects of the state's plan to develop the health IT infrastructure/capabilities at the state, delivery system, health plan/MCO, and individual provider levels	X		MT reinstated prior authorization requirements for ASAM 3.5 June 1, 2022, which was prior to the approval of the waiver. MT reinstated prior authorization requirements for the following services effective August 1, 2022: Therapeutic Group Homes, behavioral health Group Homes, Program of Assertive Community Treatment, Transcranial Magnetic Stimulation, Crisis Stabilization, and ASAM 3.1. These requirements were suspended during the PHE.

Promp	pt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
	8.2.1.e Other aspects of the state's health IT implementation milestones	Х		
	8.2.1.f The timeline for achieving health IT implementation milestones			
	8.2.1.g Planned activities to increase use and functionality of the state's prescription drug monitoring program	X		
8.2.2	The state expects to make other program changes that may affect metrics related to health IT.	Х		
9.	Other SUD-related metrics			
9.1	Metric trends			
9.1.1	The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to other SUD-related metrics.	X		
9.2	Implementation update			
9.2.1	The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to other SUD-related metrics.	X		

4. Narrative information on other reporting topics

Promp	ts	State has no update to report (place an X)	State response
10.	Budget neutrality		
10.1	Current status and analysis		
10.1.1	If the SUD component is part of a broader demonstration, the state should provide an analysis of the SUD-related budget neutrality and an analysis of budget neutrality as a whole. Describe the current status of budget neutrality and an analysis of the budget neutrality to date.	Х	The state has submitted a revised budget neutrality for SUD IMD. The state is waiting for guidance from CMS on additional revisions to the BN regarding pending components (contingency management, tenancy support, CJ involved populations) of the waiver.
10.2	Implementation update		
10.2.1	The state expects to make other program changes that may affect budget neutrality.	Х	The state is expecting approval of additional components of the waiver in subsequent quarters of DY1.

R		State has no update to report	
Promp		(place an X)	State response
11.	SUD-related demonstration operations and policy		
11.1	Considerations	1	1
11.1.1	The state should highlight significant SUD (or if broader demonstration, then SUD-related) demonstration operations or policy considerations that could positively or negatively affect beneficiary enrollment, access to services, timely provision of services, budget neutrality, or any other provision that has potential for beneficiary impacts. Also note any activity that may accelerate or create delays or impediments in achieving the SUD demonstration's approved goals or objectives, if not already reported elsewhere in this document. See Monitoring Report Instructions for more detail.	X	
11.2	Implementation update		
11.2.1	Compared to the demonstration design and operational details, the state expects to make the following changes to: 11.2.1.a How the delivery system operates under the demonstration (e.g., through the managed care system or fee for service)	X	
	11.2.1.b Delivery models affecting demonstration participants (e.g., Accountable Care Organizations, Patient Centered Medical Homes)	Х	
	11.2.1.c Partners involved in service delivery	Х	

Prompts		State has no update to report (place an X)	State response
11.2.2	The state experienced challenges in partnering with entities contracted to help implement the demonstration (e.g., health plans, credentialing vendors, private sector providers) and/or noted any performance issues with contracted entities.	Х	
11.2.3	The state is working on other initiatives related to SUD or OUD.	Х	
11.2.4	The initiatives described above are related to the SUD or OUD demonstration (The state should note similarities and differences from the SUD demonstration).	Х	

Promp	ts	State has no update to report (place an X)	State response
12.	SUD demonstration evaluation update		
12.1	Narrative information		
12.1.1	Provide updates on SUD evaluation work and timeline. The appropriate content will depend on when this monitoring report is due to CMS and the timing for the demonstration. There are specific requirements per 42 Code of Federal Regulations (CFR) § 431.428a(10) for annual [monitoring] reports. See Monitoring Report Instructions for more details.		The state is currently developing the SUD evaluation plan and that deliverable is due 12/28/22.
12.1.2	Provide status updates on deliverables related to the demonstration evaluation and indicate whether the expected timelines are being met and/or if there are any real or anticipated barriers in achieving the goals and timeframes agreed to in the STCs.	Х	
12.1.3	List anticipated evaluation-related deliverables related to this demonstration and their due dates.		The state is expected to provide the SUD evaluation plan as required in the STCs.

		State has no update to report	
Promp	ts	(place an X)	State response
13.	Other SUD demonstration reporting		
13.1	General reporting requirements		
13.1.1	The state reports changes in its implementation of the demonstration that might necessitate a change to approved STCs, implementation plan, or monitoring protocol.	Х	
13.1.2	The state anticipates the need to make future changes to the STCs, implementation plan, or monitoring protocol, based on expected or upcoming implementation changes.	Х	
13.1.3	Compared to the demonstration design and operational details, the state expects to make the following changes to: 13.1.3.a The schedule for completing and	Х	
	submitting monitoring reports		
	13.1.3.b The content or completeness of submitted monitoring reports and/or future monitoring reports	Х	
13.1.4	The state identified real or anticipated issues submitting timely post-approval demonstration deliverables, including a plan for remediation.	Х	
13.1.5	Provide updates on the results of beneficiary satisfaction surveys, if conducted during the reporting year, including updates on grievances and appeals from beneficiaries, per 42 CFR § 431.428(a)5.		The satisfaction survey is included in the 2022 URS tables, which is still in the process of being completed. MT does not yet have the final tables that would show client satisfaction.

Promp	ts	State has no update to report (place an X)	State response
13.2	Post-award public forum		
13.2.2	If applicable within the timing of the demonstration, provide a summary of the annual post-award public forum held pursuant to 42 CFR § 431.420(c) indicating any resulting action items or issues. A summary of the post-award public forum must be included here for the period during which the forum was held and in the annual monitoring report.		The post award forum was announced October 17, 2022 and it was held November 29, 2022. It was available in a hybrid format. MT gave an overview of the demonstration and indicated that the first piece (SUD IMD reimbursement) was approved July 1, 2022. It was conveyed that the remaining three components (contingency management, tenancy support, and targeted services to CJ involved individual in MT prisons) are still being negotiated with CMS.

Medicaid Section 1115 SUD Demonstrations Monitoring Report – Part B Version 5.0

[Montana] [Healing and Ending Addiction through Recovery and Treatment Demonstration]

Prompts		State has no update to report (place an X)	State response
14.	Notable state achievements and/or innovations		
14.1	Narrative information		
14.1.1	Provide any relevant summary of achievements and/or innovations in demonstration enrollment, benefits, operations, and policies pursuant to the hypotheses of the SUD (or if broader demonstration, then SUD related) demonstration or that served to provide better care for individuals, better health for populations, and/or reduce per capita cost. Achievements should focus on significant impacts to beneficiary outcomes. Whenever possible, the summary should describe the achievement or innovation in quantifiable terms, e.g., number of impacted beneficiaries.		The state's administrative rules (licensing and Medicaid services) for SUD levels of care were updated to align with the current version of The ASAM Criteria effective October 1, 2022. There are 15 ASAM 3.1 facilities, 22 ASAM 3.5 facilities, and 4 ASAM 3.7 facilities that will now be held to standards described in The ASAM Criteria. The state streamlined the SUD state approval process to streamline the process for individual Licensed Addictions Counselors wishing to be state approved and enroll in Medicaid. This was effective October 1, 2022. There has only been one individual LAC apply in DY1, Q1.

*The state should remove all example text from the table prior to submission.

Note: Licensee and states must prominently display the following notice on any display of Measure rates: *Measures IET-AD, FUA-AD, FUM-AD, and AAP [Metrics #15, 17(1), 17(2), and 32] are Healthcare Effectiveness Data and Information Set (HEDIS®) measures that are owned and copyrighted by the National Committee for Quality Assurance (NCQA). HEDIS measures and specifications are not clinical guidelines, do not establish a standard of medical care and have not been tested for all potential applications. The measures and specifications are provided "as is" without warranty of any kind. NCQA makes no representations, warranties or endorsements about the quality of any product, test or protocol identified as numerator compliant or otherwise identified as meeting the requirements of a HEDIS measure or specification. NCQA makes no representations, warranties, or endorsement about the quality of any organization or clinician who uses or reports performance measures and NCQA has no liability to anyone who relies on HEDIS measures or specifications or data reflective of performance under such measures and specifications.*

The measure specification methodology used by CMS is different from NCQA's methodology. NCQA has not validated the adjusted measure specifications but has granted CMS permission to adjust. A calculated measure result (a "rate") from a HEDIS measure that has not been certified via NCQA's Measure Certification Program, and is based on adjusted HEDIS specifications, may not be called a "HEDIS rate" until it is audited and designated reportable by an NCQA-Certified HEDIS Compliance Auditor. Until such time, such measure rates shall be designated or referred to as "Adjusted, Uncertified, Unaudited HEDIS rates."