

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

November 16, 2020

Jeremey Brunssen
Interim Director
Division of Medicaid and Long-Term Care
Department of Health and Human Services
301 Centennial Mall South, 3rd Floor
P.O. Box 95026
Lincoln, NE 68509-5026

Dear Mr. Brunssen:

The Centers for Medicare & Medicaid Services (CMS) has completed its review of the substance use disorder (SUD) Monitoring Protocol, which is required by the Special Terms and Conditions (STC) of Nebraska's section 1115 demonstration, "Substance Use Disorder (SUD) Program" (Project No. 11-W-10025/7). CMS has determined that the monitoring protocol, which was submitted on October 26, 2020, meets the requirements set forth in the STCs, and thereby approves Nebraska's SUD monitoring protocol.

The monitoring protocol is approved for the demonstration period through June 30, 2024 and is hereby incorporated into the demonstration STCs as Attachment D. In accordance with STC 42 (Public Access), the approved SUD monitoring protocol may now be posted to your state's Medicaid website.

If you have any questions, please contact your CMS project officer, Ms. Juliana Sharp. Ms. Sharp is available to answer any questions concerning your section 1115 demonstration and may be reached by email at Juliana.Sharp@cms.hhs.gov.

We look forward to our continued partnership on Nebraska’s Substance Use Disorder (SUD) Program section 1115 Medicaid demonstration.

Sincerely,

**Danielle
Daly -S** Digitally signed by
Danielle Daly -S
Date: 2020.11.16
12:30:02 -05'00'

Danielle Daly
Director
Division of Demonstration
Monitoring and Evaluation

**Angela D.
Garner -S** Digitally signed by
Angela D. Garner -S
Date: 2020.11.16
17:22:24 -05'00'

Angela D. Garner
Director
Division of System Reform
Demonstrations

cc: Ashtan Mitchell, State Monitoring Lead, CMS Medicaid and CHIP Operations Group

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

The state should complete this Title Page as part of its SUD Monitoring Protocol. This form should be submitted as the title page for all Monitoring Reports. The content of this table should stay consistent over time.

State	<i>Nebraska</i>
Demonstration name	<i>Nebraska Substance Use Disorder Program</i>
Approval date for demonstration	<i>June 28, 2019</i>
Approval period for SUD	<i>July 1, 2019 – June 30, 2024</i> <input type="checkbox"/>
Approval date for SUD, if different from above	
Implementation date of SUD, if different from above	<i>July 1, 2019</i>
SUD (or if broader demonstration, then SUD - related) demonstration goals and objectives	<p><i>During the demonstration period, the state seeks to achieve the following goals:</i></p> <ol style="list-style-type: none"> <i>1. Increased rates of identification, initiation, and engagement in treatment for SUD;</i> <i>2. Increased adherence to and retention in treatment;</i> <i>3. Reductions in overdose deaths, particularly those due to opioids;</i> <i>4. 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;</i> <i>5. Fewer readmissions to the same or higher level of care where the readmission is preventable or medically inappropriate; and,</i> <i>6. Improved access to care for physical health conditions among beneficiaries with SUD.</i> <input type="checkbox"/>

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

Summary of proposed modification	Related metric (if any)	Justification for modification
1. Assessment of Need and Qualification for SUD Services		
<p><i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i></p> <p><i>EXAMPLE</i> <i>Additional topic of interest</i></p>		<p><i>Summarize how the proposed modification will alter reporting relative to the SUD Monitoring Report Template and provide reasoning why this modification is needed</i></p> <p><i>EXAMPLE</i> <i>In addition to reporting on the requested information, the state plans to report on progress on X implementation activity not currently listed in the report template. The state will add this activity as a new row to the “Narrative Information on Implementation” table in Part A of its Monitoring Reports.</i></p>
[Add rows as needed]		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
2. Access to Critical Levels of Care for OUD and other SUDs (Milestone 1)		
<p><i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i></p>		
[Add rows as needed]		

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<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
3. Use of Evidence-based, SUD-specific Patient Placement Criteria (Milestone 2)		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
4. Use of Nationally Recognized SUD-specific Program Standards to Set Provider Qualifications for Residential Treatment Facilities (Milestone 3)		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		
<i>[Add rows as needed]</i>		

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<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
5. Sufficient Provider Capacity at Critical Levels of Care including for Medication Assisted Treatment for OUD (Milestone 4)		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
6. Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and OUD (Milestone 5)		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		
<i>[Add rows as needed]</i>		

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7. Improved Care Coordination and Transitions between Levels of Care (Milestone 6)		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
8. SUD Health Information Technology (Health IT)		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		
<i>[Add rows as needed]</i>		

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<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
9. Other SUD-related Metrics		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		
<i>[Add rows as needed]</i>		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
10. Budget Neutrality		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		
<i>[Add rows as needed]</i>		

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11. SUD-Related Demonstration Operations and Policy		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		
[Add rows as needed]		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
12. SUD Demonstration Evaluation Update		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		
[Add rows as needed]		

Summary of proposed modification	Related metric (if any)	Justification for modification
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<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
13. Other Demonstration Reporting		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		
[Add rows as needed]		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		
14. Notable State Achievements and/or Innovations		
<i>Provide a brief description of any changes or modifications the state expects to make in its narrative reporting, relative to the expectations described in the SUD Monitoring Report Template (Narrative Information on Implementation)</i>		
[Add rows as needed]		

Summary of proposed modification	Related metric (if any)	Justification for modification
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		

3. Acknowledgement of Budget Neutrality Reporting-

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

4. Retrospective reporting

If a state's monitoring protocol is approved after its first quarterly monitoring report submission date, the state should report data to CMS retrospectively for any prior quarters of SUD demonstration implementation. States are expected to submit retrospective metrics data in the state's second monitoring report submission after monitoring protocol approval, or propose an alternative plan for reporting retrospectively on its SUD demonstration.

In the monitoring report submission containing retrospective metrics data, the state should also provide a general assessment of metrics trends from the start of the state's demonstration through the end of the current reporting period. The state should report this information in Part B of its report submission (Table 3: Narrative Information on Implementation, by Milestone and Reporting Topic). This general assessment is not intended to be a comprehensive description of every trend observed in metrics data (for example, unlike other monitoring report submissions, the state is not required to describe all metrics changes (+ or - greater than 2 percent). Rather, the assessment is an opportunity for states to provide context for its retrospective metrics data, to support CMS's review and interpretation. For example, consider a state that submits data showing an increase in the number of medication assisted treatment (MAT) providers (Metric #14) over the course of the retrospective reporting period. The state may decide to highlight this trend to CMS in Part B of its report (under Milestone 4) by briefly summarizing the trend and providing context that during this period, the state implemented a grant that supported training for new MAT providers throughout the state.

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

The state proposes an alternative plan to report retrospectively for any quarters prior to monitoring protocol approval: *Insert narrative description of proposed alternative plan for retrospective reporting. State should provide justification for its proposed alternative plan.*

5. Reporting SUD Demonstration Metrics and Narrative Information

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

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

The state has reviewed Appendix A of the instructions document and completed the table below with the following deviations: *Insert narrative description of proposed changes to reporting. State should provide justification for any proposed deviation.*

Table A.1. Suggested reporting schedule for Nebraska metrics and narrative information

Dates of reporting quarter	SUD DY	Report due (per STC schedule)	Measurement period associated with SUD information in report, by reporting category
7/1/2019 – 9/30/2019	DY1Q1	11/29/2019	<i>Protocol in development</i>
10/1/2019 – 12/31/2019	DY1Q2	2/29/2020	<i>Protocol in development</i>
1/1/2020 – 3/31/2020	DY1Q3	5/30/2020	<i>Protocol in development</i>
4/1/2020 – 6/30/2020	DY1Q4 (Annual)	9/28/2020	<ul style="list-style-type: none"> • Narrative information for SUD DY1Q4 • Other monthly and quarterly metrics for SUD DY1Q3
7/1/2020 – 9/30/2020	DY2Q1	11/29/2020	<ul style="list-style-type: none"> • Narrative information for SUD DY2Q1 • Other monthly and quarterly metrics for SUD DY1Q4 • Other annual metrics for SUD DY1 • Annual metrics that are established quality measures for CY 2019*
10/1/2020 – 12/31/2020	DY2Q2	3/1/2021	<ul style="list-style-type: none"> • Narrative information for SUD DY2Q2 • Other monthly and quarterly metrics for SUD DY2Q1
1/1/2021 – 3/31/2021	DY2Q3	5/30/2021	<ul style="list-style-type: none"> • Narrative information for SUD DY2Q3 • Other monthly and quarterly metrics for SUD DY2Q2
4/1/2021 – 6/30/2021	DY2Q4 (Annual)	9/28/2021	<ul style="list-style-type: none"> • Narrative information for SUD DY2Q4 • Other monthly and quarterly metrics for SUD DY2Q3 • Annual metrics that are established quality measures for CY 2020
7/1/2021 – 9/30/2021	DY3Q1	11/29/2021	<ul style="list-style-type: none"> • Narrative information for SUD DY3Q1 • Other monthly and quarterly metrics for SUD DY2Q4

Dates of reporting quarter	SUD DY	Report due (per STC schedule)	Measurement period associated with SUD information in report, by reporting category
			<ul style="list-style-type: none"> Other annual metrics for SUD DY2
10/1/2021 – 12/31/2021	DY3Q2	3/1/2022	<ul style="list-style-type: none"> Narrative information for SUD DY3Q2 Other monthly and quarterly metrics for SUD DY3Q1
1/1/2022 – 3/31/2022	DY3Q3	5/30/2022	<ul style="list-style-type: none"> Narrative information for SUD DY3Q3 Other monthly and quarterly metrics for SUD DY3Q2
4/1/2022 – 6/30/2022	DY3Q4 (Annual)	9/28/2022	<ul style="list-style-type: none"> Narrative information for SUD DY3Q4 Other monthly and quarterly metrics for SUD DY3Q3 Annual metrics that are established quality measures for CY 2021
7/1/2022 – 9/30/2022	DY4Q1	11/29/2022	<ul style="list-style-type: none"> Narrative information for SUD DY4Q1 Other monthly and quarterly metrics for SUD DY3Q4 Other annual metrics for SUD DY3
10/1/2022 – 12/31/2022	DY4Q2	3/1/2023	<ul style="list-style-type: none"> Narrative information for SUD DY4Q2 Other monthly and quarterly metrics for SUD DY4Q1
1/1/2023 – 3/31/2023	DY4Q3	5/30/2023	<ul style="list-style-type: none"> Narrative information for SUD DY4Q3 Other monthly and quarterly metrics for SUD DY4Q2
4/1/2023 – 6/30/2023	DY4Q4 (Annual)	9/28/2023	<ul style="list-style-type: none"> Narrative information for SUD DY4Q4 Other monthly and quarterly metrics for SUD DY4Q3 Annual metrics that are established quality measures for CY 2022
7/1/2023 – 9/30/2023	DY5Q1	11/29/2023	<ul style="list-style-type: none"> Narrative information for SUD DY5Q1 Other monthly and quarterly metrics for SUD DY4Q4

Dates of reporting quarter	SUD DY	Report due (per STC schedule)	Measurement period associated with SUD information in report, by reporting category
			<ul style="list-style-type: none"> • Other annual metrics for SUD DY4
10/1/2023 – 12/31/2023	DY5Q2	2/29/2024	<ul style="list-style-type: none"> • Narrative information for SUD DY5Q2 • Other monthly and quarterly metrics for SUD DY5Q1
1/1/2024 – 3/31/2024	DY5Q3	5/30/2024	<ul style="list-style-type: none"> • Narrative information for SUD DY5Q3 • Other monthly and quarterly metrics for SUD DY5Q2
4/1/2024 – 6/30/2024	DY5Q4 (Annual)	9/28/2024	<ul style="list-style-type: none"> • Narrative information for SUD DY5Q4 • Other monthly and quarterly metrics for SUD DY5Q3 • Annual metrics that are established quality measures for CY 2023

*The state will delay reporting on established quality measures for CY2019 until the state’s DY2Q1 report, to allow time for the state to transition to using Version 3.0 of the technical specifications manual.

*In this example, the state’s SUD demonstration was added to its broader 1115 demonstration by amendment at the start of the broader 1115 demonstration’s third demonstration year. States that do not have a broader 1115 demonstration (i.e., that have a SUD demonstration only) should delete this column.

**In this example, the state reports its established quality measures in the second quarterly report following the annual report because its demonstration year ends on 12/31; this lag allows adequate time for claims runout and other data completeness issues, as well as time to incorporate annual measure steward updates to specifications. States with demonstration years that end January 31 or February 28 should instead report established quality measures in the first quarterly report following the annual report. All other states should report established quality measures in the annual report.