

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

July 28, 2020

Ben Shaffer
Deputy Secretary and Acting Medicaid Director
Rhode Island Executive Office of Health and Human Services
3 West Rd, Virks Building
Cranston, RI 02920

Dear Mr. Shaffer:

Thank you to you and your staff for your work on the monitoring protocol for the substance use disorder (SUD) component of the state's section 1115 demonstration, "Rhode Island Comprehensive Demonstration" (Project No: 11-W-00242/1). The SUD monitoring protocol submitted to the Centers for Medicare & Medicaid Services (CMS) on July 8, 2020 has been found to fulfill the requirements set forth in the Special Terms and Conditions (STC), specifically STC 89(b), and the State Medicaid Director Letter (SMD #17-003), "Strategies to Address the Opioid Epidemic."

The monitoring protocol is approved for the demonstration period through December 31, 2023 and is hereby incorporated into the demonstration STCs as Attachment AA (see attached). Per 42 CFR 431.424(c), 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. Kathleen O'Malley. Ms. O'Malley is available to answer any questions concerning your section 1115 demonstration and may be reached either by phone at 410-786-8987 or by email at Kathleen.OMalley@cms.hhs.gov.

We look forward to our continued partnership on the section 1115 Rhode Island Comprehensive Demonstration.

Sincerely,

Angela D.
Garner -S

Digitally signed by Angela
D. Garner -S
Date: 2020.07.30
09:25:15 -04'00'

Angela D. Garner
Director
Division of System Reform
Demonstrations

cc: Joyce Butterworth, 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	Rhode Island
Demonstration name	Rhode Island Comprehensive Demonstration: Opioid Use Disorder/Substance Use Disorder Program
Approval date for demonstration	December 21, 2018
Approval period for SUD	January 1, 2019 through December 31, 2023
Approval date for SUD, if different from above	December 21, 2018
Implementation date of SUD, if different from above	July 1, 2019
SUD (or if broader demonstration, then SUD - related) demonstration goals and objectives	<p>Effective upon CMS’ approval of the OUD/SUD Implementation Plan Protocol, the demonstration benefit package for Rhode Island Medicaid recipients will include OUD/SUD treatment services, including short term residential services provided 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. The state will be eligible to receive FFP for Rhode Island Medicaid recipients who are short-term residents in IMDs under the terms of this demonstration for coverage of medical assistance, including OUD/SUD benefits that would otherwise be matchable if the beneficiary were not residing in an IMD. Rhode Island must aim for a statewide average length of stay of 30 days in residential treatment settings, to be monitored pursuant to the SUD Monitoring Plan as outlined below, to ensure short-term residential treatment stays. Under this demonstration, 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.</p> <p>The coverage of OUD/SUD treatment services and withdrawal management during short term residential and inpatient stays in IMDs will expand Rhode Island’s current SUD benefit package available to all Rhode Island Medicaid recipients, including peer support services authorized under 1115 demonstration authority as described in STC 99. Room and board costs are not considered allowable costs for residential treatment service providers unless they qualify as inpatient facilities under section 1905(a) of the Act.</p>

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		
<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)		
<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)		
<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)		
<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).		
5. Sufficient Provider Capacity at Critical Levels of Care including for Medication Assisted Treatment for OUD (Milestone 4)		
<input type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information with the modifications described above.		
<input checked="" type="checkbox"/> The state has reviewed the corresponding prompts for narrative information in the SUD Monitoring Report Template and confirms that it will report the narrative information as requested (no modifications).		

Summary of proposed modification	Related metric (if any)	Justification for modification
6. Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and OUD (Milestone 5)		
<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).		
7. Improved Care Coordination and Transitions between Levels of Care (Milestone 6)		
<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)		
<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).		
9. Other SUD-related Metrics		
<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		
<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).		
11. SUD-Related Demonstration Operations and Policy		

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).		
12. SUD Demonstration Evaluation Update		
Use NORC's separate evaluation updates for this section. The state will not provide additional information.		Rhode Island's evaluation is being conducted by an external vendor, NORC. They will be providing the appropriate updates through their evaluation plan.
<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 with the modifications described above.		
<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 as requested (no modifications).		
13. Other Demonstration Reporting		
<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		
<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. Rhode Island reporting in quarterly and annual monitoring reports

Dates of reporting quarter	Broader 1115 DY (if applicable)*	SUD DY**	Report due (per STCs schedule)	Measurement period associated with SUD information in report, by reporting category
July 1, 2019 – September 30, 2019	DY11 Q3	DY1 Q3	11/29/2019	<ul style="list-style-type: none"> Narrative information for SUD DY1 Q3
October 1, 2019 – December 31, 2019	DY11 Q4	DY1 Q4	3/30/2020	<ul style="list-style-type: none"> Narrative information for SUD DY1 Q4 Monthly and quarterly metrics for SUD DY1 Q3
January 1, 2020 – March 31, 2020	DY12 Q1	DY2 Q1	5/30/2020	<ul style="list-style-type: none"> Narrative information for SUD DY2 Q1 Monthly and quarterly metrics for SUD DY1 Q4 Annual CMS-constructed and state-identified metrics (calculated for SUD DY1), except for Metrics #26 and 27
April 1, 2020 – June 30, 2020	DY12 Q2	DY2 Q2	8/29/2020	<ul style="list-style-type: none"> Narrative information for SUD DY2 Q2 Monthly and quarterly metrics for SUD DY2 Q1 Metrics #26 and 27, calculated for SUD DY1 Annual metrics that are established quality measures (calculated for CY 2019)
July 1, 2020 – September 30, 2020	DY12 Q3	DY2 Q3	11/29/2020	<ul style="list-style-type: none"> Narrative information for SUD DY2 Q3 Monthly and quarterly metrics for SUD DY2 Q2
October 1, 2020 – December 31, 2020	DY12 Q4	DY2 Q4	3/31/2021	<ul style="list-style-type: none"> Narrative information for SUD DY2 Q4 Monthly and quarterly metrics for SUD DY2 Q3
January 1, 2021 – March 31, 2021	DY13 Q1	DY3 Q1	5/30/2021	<ul style="list-style-type: none"> Narrative information for SUD DY3 Q1 Monthly and quarterly metrics for SUD DY2 Q4 Annual CMS-constructed and state-identified metrics (calculated for SUD DY2)
April 1, 2021 – June 30, 2021	DY13 Q2	DY3 Q2	8/29/2021	<ul style="list-style-type: none"> Narrative information for SUD DY3 Q2 Monthly and quarterly metrics for SUD DY3 Q1 Annual metrics that are established quality measures (calculated for CY 2020)
July 1, 2021 – September 30, 2021	DY13 Q3	DY3 Q3	11/29/2021	<ul style="list-style-type: none"> Narrative information for SUD DY3 Q3 Monthly and quarterly metrics for SUD DY3 Q2

Dates of reporting quarter	Broader 1115 DY (if applicable)*	SUD DY**	Report due (per STCs schedule)	Measurement period associated with SUD information in report, by reporting category
October 1, 2021 – December 31, 2021	DY13 Q4	DY3 Q4	3/31/2022	<ul style="list-style-type: none"> Narrative information for SUD DY3 Q4 Monthly and quarterly metrics for SUD DY3 Q3
January 1, 2022 – March 31, 2022	DY14 Q1	DY4 Q1	5/30/2022	<ul style="list-style-type: none"> Narrative information for SUD DY4 Q1 Monthly and quarterly metrics for SUD DY3 Q4 Annual CMS-constructed and state-identified metrics (calculated for SUD DY3)
April 1, 2022 – June 30, 2022	DY14 Q2	DY4 Q2	8/29/2022	<ul style="list-style-type: none"> Narrative information for SUD DY4 Q2 Monthly and quarterly metrics for SUD DY4 Q1 Annual metrics that are established quality measures (calculated for CY 2021)
July 1, 2022 – September 30, 2022	DY14 Q3	DY4 Q3	11/29/2022	<ul style="list-style-type: none"> Narrative information for SUD DY4 Q3 Monthly and quarterly metrics for SUD DY4 Q2
October 1, 2022 – December 31, 2022	DY14 Q4	DY4 Q4	3/31/2023	<ul style="list-style-type: none"> Narrative information for SUD DY4 Q4 Monthly and quarterly metrics for SUD DY4 Q3
January 1, 2023 – March 31, 2023	DY15 Q1	DY5 Q1	5/30/2023	<ul style="list-style-type: none"> Narrative information for SUD DY5 Q1 Monthly and quarterly metrics for SUD DY4 Q4 Annual CMS-constructed and state-identified metrics (calculated for SUD DY4)
April 1, 2023 – June 30, 2023	DY15 Q2	DY5 Q2	8/29/2023	<ul style="list-style-type: none"> Narrative information for SUD DY5 Q2 Monthly and quarterly metrics for SUD DY5 Q1 Annual metrics that are established quality measures (calculated for CY 2022)
July 1, 2023 – September 30, 2023	DY15 Q3	DY5 Q3	11/29/2023	<ul style="list-style-type: none"> Narrative information for SUD DY5 Q3 Monthly and quarterly metrics for SUD DY5 Q2
October 1, 2023 – December 31, 2023	DY15 Q4	DY5 Q4	3/30/2024	<ul style="list-style-type: none"> Narrative information for SUD DY5 Q4 Monthly and quarterly metrics for SUD DY5 Q3

*The “broader 1115 DY” column identifies the DY as originally defined in the STCs, for reference. The approval period for the current demonstration period ends December 31, 2023.

**Because RI began SUD demonstration implementation on July 1, 2019, the state’s SUD DY1 is considered to include two quarters (DY1 Q3 and DY1 Q4) spanning July 1, 2019 – December 31, 2019. For purposes of baseline reporting for SUD monitoring metrics, the state will report data on calendar year 2019 (i.e., January 1 – December

31, 2019). The state should include data on its full baseline period when it reports retrospectively as described in Section 4 (Retrospective Reporting) of Part B.