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	Automatically populated with the state name.
Demonstration name	Automatically populated with the demonstration name.
Approval period for section 1115 demonstration	Automatically populated with the current approval period for the section 1115 demonstration as listed in the current special terms and conditions (STC), including the start date and end date (MM/DD/YYYY – MM/DD/YYYY).
SUD demonstration start date ^a	Automatically populated with the start date for the section 1115 SUD demonstration or SUD component if part of a broader demonstration (MM/DD/YYYY).
Implementation date of SUD demonstration, if different from SUD demonstration start date ^b	Automatically populated with the SUD demonstration implementation date (MM/DD/YYYY).
SUD (or if broader demonstration, then SUD -related) demonstration goals and objectives	Automatically populated with the summary of the SUD (or if broader demonstration, then SUD-related) demonstration goals and objectives.
SUD demonstration year and quarter	SUD Demonstration Year 8 Quarter 4 – DY8 Q4
Reporting period	01/01/2025 - 03/31/2025

^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. Executive summary

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

DMAS staff continued to provide subject matter expertise, training, technical support, and other assistance to support Preferred Office-Based Addiction Treatment (OBAT) providers. DMAS continued its review of quality assurance activities performed by managed care organizations (MCOs) as required by the Managed Care contract to identify successes and opportunities for growth. During this reporting period, DMAS moved forward with the awarding of new contracts for the Cardinal Care Managed Care program. This has allowed DMAS to begin discussions about transitioning the OBAT attestation process to the Managed Care providers. Preliminary conversations have been productive and DMAS continues to work to develop a process to make this transition as seamless as possible. Activities supporting access to medications for opioid use disorder (MOUD) also included DMAS completing five Preferred OBAT application reviews during this reporting period, approving six applications. There were a total of 222 approved OBAT providers at the end of this reporting period.

DMAS continues to work with Managed Care Organizations and providers to address issues that arose because of the transition of the Behavioral Health Services Administrator contract. DMAS now has primary responsibility for reviewing operations issues relative to ARTS-related claims.

DMAS continued its preparations to transition to the fourth edition of the American Society of Addiction Medicine (ASAM) Criteria. The ASAM model provides the foundation for the ARTS benefit, as it utilizes the multidimensional assessment and levels of care as defined by ASAM to determine the best care for members with substance use disorders. Transition planning included collaboration with the Department of Behavioral Health and Developmental Services, who licenses behavioral health providers in the Commonwealth, to ensure that the transition is as seamless as possible. DMAS tentatively plans to "go live" with these changes on or about July 1, 2026. This date is subject to change based on the operationalization of the changes to existing services as well as the addition of new levels of service in the continuum of care.

Lastly, DMAS began in earnest the first phase of the Discharge Bridge program. This multi-year project is designed to proceed in two phases. Phase One includes funding of \$150,000 to DMAS to create and facilitate a training/technical assistance program for hospitals to launch emergency department bridge programs for patients with opioid use disorders. Training and technical assistance events, led by Carilion Clinic, have been well attended with providers showing interest in implementing the project in their settings. During this reporting period, DMAS drafted its proposal to the Opioid Abatement Authority for Phase Two funds to incentivize hospitals and health systems to implement bridge models by providing resources to offset the administrative costs of model implementation. Bridge programs are expected to become self-sustaining with medical reimbursements and will support the Governor's Right Help Right Now plan.

There are no deliverables outstanding as of the writing of this summary.

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	services		
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.	X		No metric trends fall outside of the benchmark levels agreed upon by DMAS and CMS.
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 demonstration	X		
	1.2.1.b The clinical criteria (e.g., SUD diagnoses) that qualify a beneficiary for the demonstration	X		
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.	X		

Prom	ot	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	l other SUDs (Mi	ilestone 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 7 – Early Intervention	The quarterly difference for this metric fell outside the a greed upon benchmark of 25 units of service per quarter. This decrease represents a seasonal variation in data that DMAS has observed in past years and does not believe it to be especially unusual given the low utilization levels of this service.
2.2	Implementation update			
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 to SUD treatment services across the continuum of care for Medicaid beneficiaries (e.g., outpatient services, intensive outpatient services, medication-assisted treatment, services in intensive residential and inpatient settings, medically supervised withdrawal management)	X		
	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	X		

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

Promp	ot	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
3.	Use of Evidence-based, SUD-specific Patient P	Placement Criter	ia (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.	X		No metric trends fall outside of the benchmark levels agreed upon by DMAS and CMS.
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	X		
3.2.2	The state expects to make other program changes that may affect metrics related to Milestone 2.	X		

Promj	pt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
4.	Use of Nationally Recognized SUD-specific F (Milestone 3)	rogram Standar	ds to Set Provider (Qualifications for Residential Treatment Facilities
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		No update to report.
Milesto reporti	There are no CMS-provided metrics related to one 3. If the state did not identify any metrics for any this milestone, the state should indicate it has no e 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:	X		
	4.2.1.a Implementation of residential treatment provider qualifications that meet the ASAM Criteria or other nationally recognized, SUD-specific program standards			
	4.2.1.b Review process for residential treatment providers' compliance with qualifications	X		
	4.2.1.c Availability of medication-assisted treatment at residential treatment facilities, either on-site or through facilitated access to services off site	X		
4.2.2	The state expects to make other program changes that may affect metrics related to Milestone 3.			

Promp	ot	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
5.	Sufficient Provider Capacity at Critical Leve	ls of Care includ	ling for Medication	Assisted 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		No update to report.
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 a cross the continuum of SUD care.	X		
5.2.2	The state expects to make other program changes that may affect metrics related to Milestone 4.	X		

Promj	pt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
6.	Implementation of Comprehensive Treatment	t and Prevention	Strategies to Addr	ess 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.	X		No metric trends fall outside of the benchmark levels agreed upon by DMAS and CMS.
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	X		
6.2.2	The state expects to make other program changes that may affect metrics related to Milestone 5.	X		

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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	between 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.	X		No update to report.
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.	X		
7.2.2	The state expects to make other program changes that may affect metrics related to Milestone 6.	X		

Promp	ot	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
8.	SUD health information technology (health IT	<u> </u>		
8.1	Metric trends			
8.1.1	The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to its health IT metrics.		Q2, Q3	Q1 related to justice-involved members saw relatively no change Q2 (use of telehealth modifier) and Q3 (count of Peer Recovery Specialists) both increased during this reporting period. These trends were expected by DMAS and indicate an encouraging trend for the continued development and utilization of Peer Recovery Services (Q3).
8.2	Implementation update			
8.2.1	Compared to the demonstration design and operational details, the state expects to make the following changes to: 8.2.1.a 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		

Promp	pt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
	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		
	8.2.1.e Other a spects of the state's health IT implementation milestones	X		
	8.2.1.f The timeline for achieving health IT implementation milestones	X		
	8.2.1.g Planned activities to increase use and functionality of the state's prescription drug monitoring program			
8.2.2	The state expects to make other program changes that may affect metrics related to health IT.	S X		
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.		Grievances and Appeals	There was an increase in both grievances and appeals during this reporting period. Per CMS guidance, DMAS continues to monitor these figures for trends and anomalies.
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	ots	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.		DMAS is up to date with budget neutrality reports and has consistently shown a neutral budget.
10.2	Implementation update		
10.2.1	The state expects to make other program changes that may affect budget neutrality.	X	

Promp	ots	State has no update to report (place an X)	State response
11.	SUD-related demonstration operations and polic	y	
11.1	Considerations		
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.		DMAS continues to track the impact of enrollment unwinding that took place after the conclusion of the COVID-19 PHE on Members with SUD.
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)		DMAS is continuing the process of awarding contracts to administer a statewide, coordinated delivery system for Medicaid managed care members enrolled in Cardinal Care.
	11.2.1.b Delivery models a ffecting demonstration participants (e.g., Accountable Care Organizations, Patient Centered Medical Homes)	X	
	11.2.1.c Partners involved in service delivery	X	

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.		Virginia is experiencing a behavioral health workforce shortage, not only for substance use disorders but also mental health. The administration is collaborating efforts to address this for the Commonwealth through the "Right Help. Right Now." behavioral health transformation plan. During this reporting period, DMAS continued to work with providers to make sure they are navigating the provider enrollment process efficiently and following up on any issues with our provider enrollment unit.
11.2.3	The state is working on other initiatives related to SUD or OUD.		DMAS continues to make progress on the Discharge Bridge Program. Training and technical assistance is being provided to hospitals and health groups, and DMAS intends to apply for funding to incentivize hospitals and health groups for Discharge Bridge Program implementation. If a warded, a Request for Proposals will be released in late CY 2025.
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).	X	

Promp	ots	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.		DMAS has contracted with Virginia Commonwealth University (VCU) for the independent evaluation of the demonstration waiver and is on target with all deliverables.
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 a chieving the goals and timeframes a greed to in the STCs.		There are no anticipated barriers to meet the reporting deadlines approved by CMS.
12.1.3	List anticipated evaluation-related deliverables related to this demonstration and their due dates.		DMAS is current on all submissions and responses to comments from CMS for all deliverables.

Promp	ots	State has no update to report (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.	X	
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.	X	
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 submitting monitoring reports	X	
	13.1.3.b The content or completeness of submitted monitoring reports and/or future monitoring reports	X	
13.1.4	The state identified real or anticipated issues submitting timely post-approval demonstration deliverables, including a plan for remediation.	X	
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.	X	

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Prompts		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.	X	

Promp	ots	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.	X	

^{*}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:

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