

Nebraska's Section 1115 Medicaid Substance Use Disorder Waiver

December 14, 2022

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Agenda

- Brief overview of the NE 1115 SUD Demonstration Waiver and Timeline
- High-level walk-through of Nebraska's 1115 SUD waiver evaluation and implementation status.
- Future work update
- Discussion and questions
- Addendum
- Helpful Links

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NE 1115 SUD Demonstration Waiver

Overview

Quick Facts:

- Waiver Period:
July 1, 2019 – June 30, 2024
- Expenditure authority to cover stays within Institutions for Mental Diseases (IMDs) for adults 21 to 64 years old otherwise not coverable by Medicaid.
- Expansion of SUD services:
 - Opioid Treatment Program (OTP)
 - Medically Monitored Inpatient Withdrawal Management (MMIW)
 - Medication-Assisted Treatment (MAT)

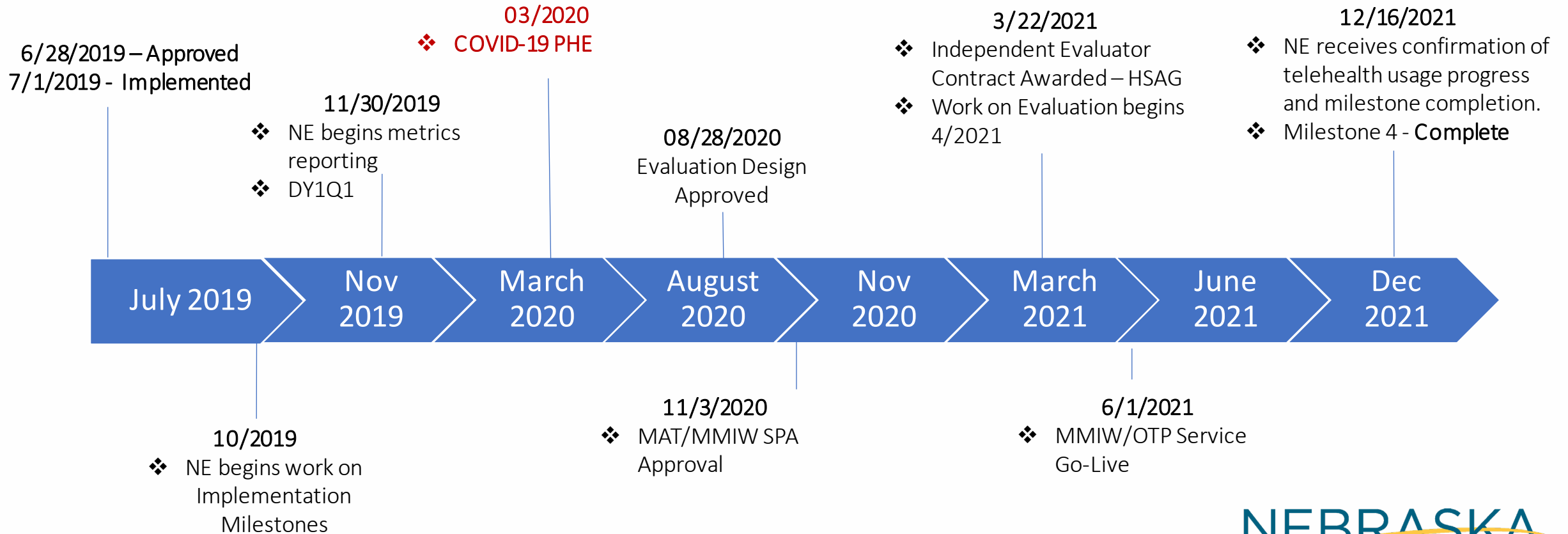
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1115 SUD Waiver Status Update 2019–2021



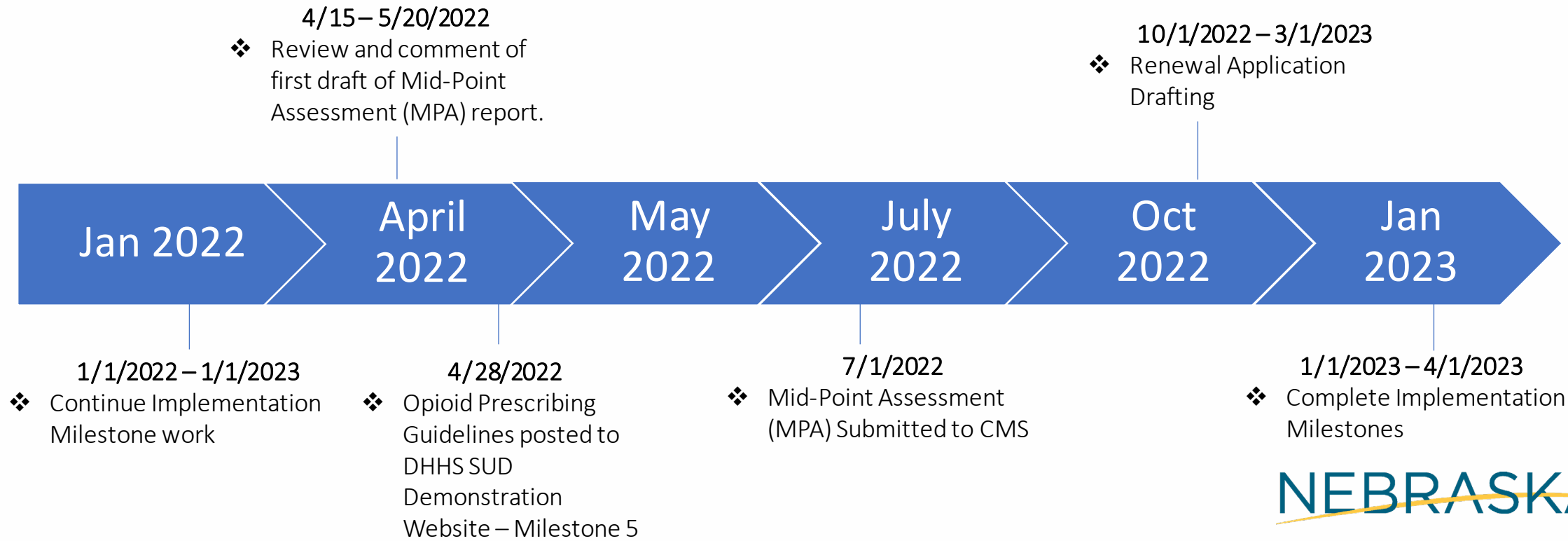
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1115 SUD Waiver Status Update 2022 – 2023



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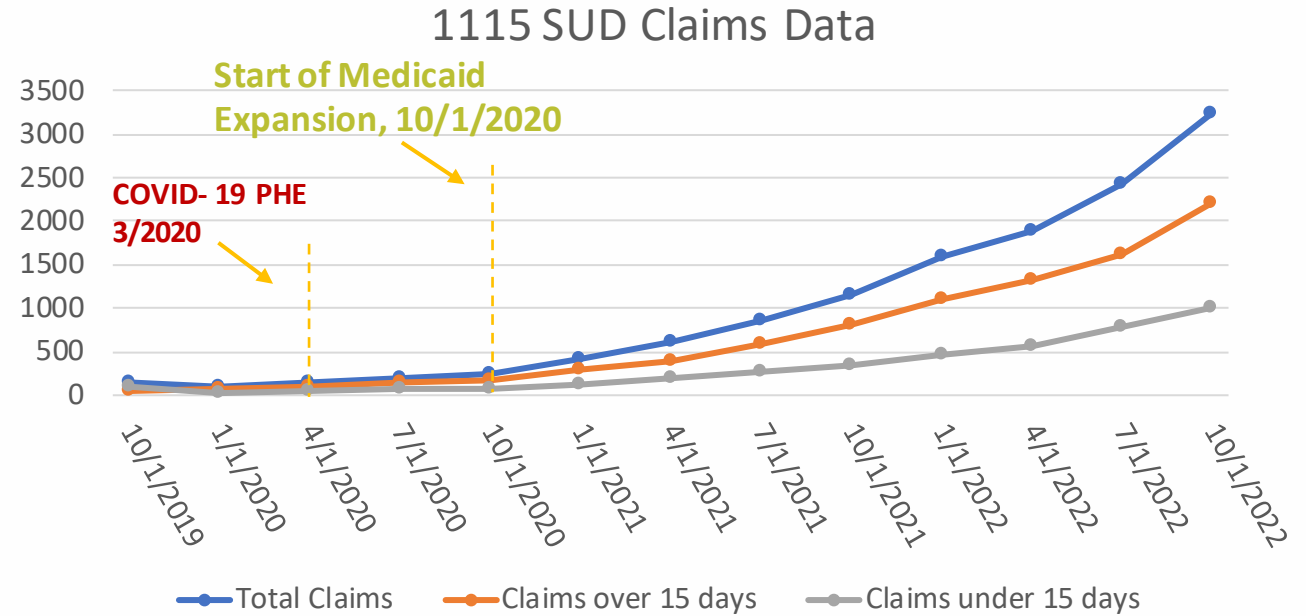
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1115 SUD Waiver – IMD Stays Update

- Nebraska Medicaid Section 1115 SUD Demonstration waiver has covered:

IMD Stays (claims) 7/01/2019 – 9/30/2022	
Total Stays	3246
Stays Under 15 Days	1014
Stays Over 15 Days	2202
Incomplete Stays	30



❖ **Stays over 15 days account for 68% of IMD Stays**

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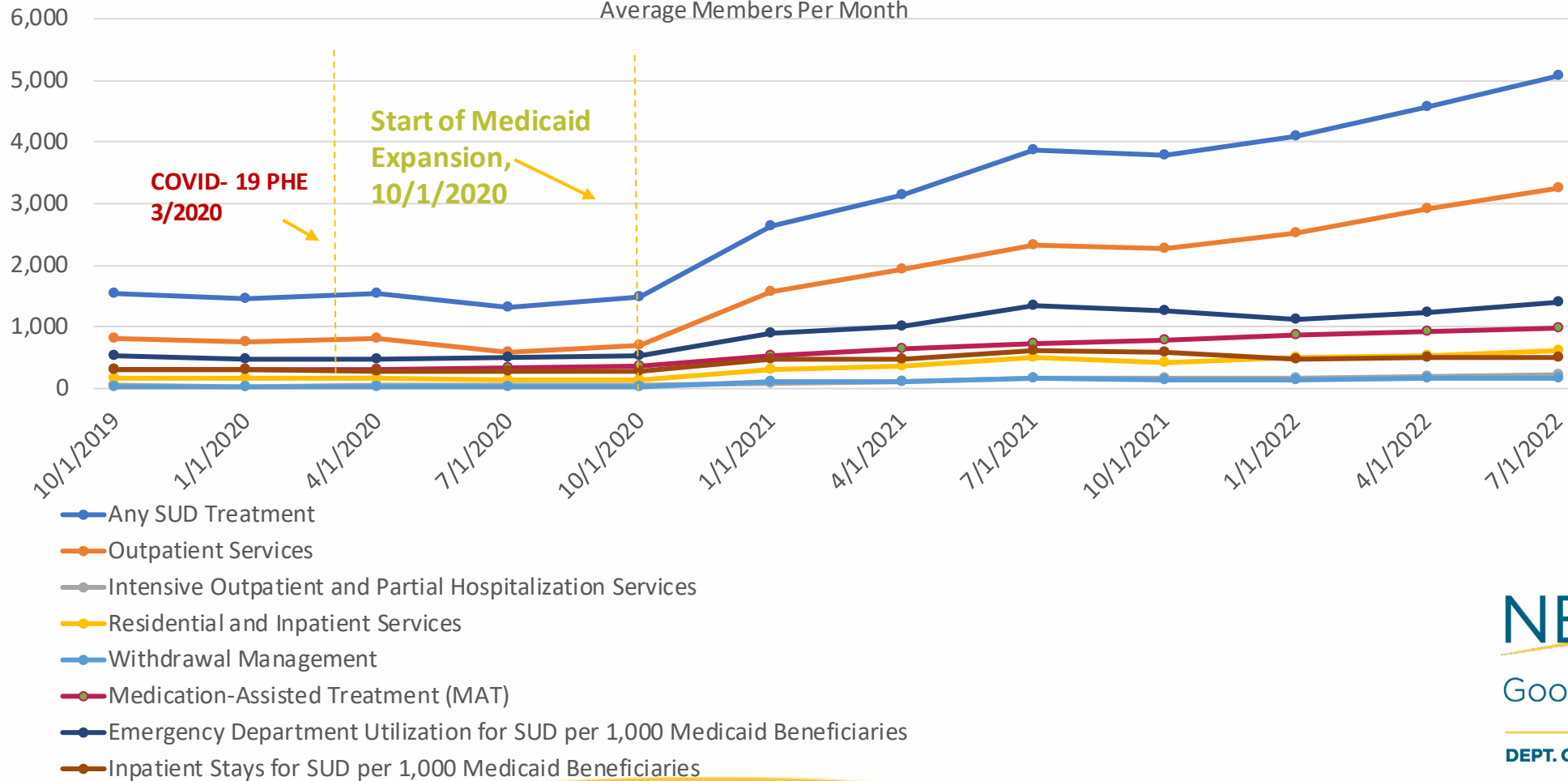
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1115 SUD Waiver – Metric Trends

SUD Metrics 7/1/2019 – 6/30/2022

Average Members Per Month



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1115 SUD Waiver – Evaluation

Upon approval of the demonstration and as part of the Evaluation Design, Nebraska is required to arrange with an independent party to conduct an evaluation of the demonstration to ensure that the necessary data is collected at the level of detail needed to research the approved hypotheses. This Evaluation Design includes the Interim Evaluation Report (IR), and the Summative Evaluation Reports. An independent party is also required to complete the Mid-Point Assessment (MPA).

- Evaluator: Health Services Advisory Group (HSAG)
 - Contract Awarded: 03/22/2021

Evaluation Deliverable	Component
Mid-Point Assessment Submitted: 07/01/2022	<ul style="list-style-type: none">• Qualitative Interviews• Analysis of Monitoring Metrics• Implementation Milestone Progress
Interim Evaluation Report Anticipated Submission: 06/30/2023	<ul style="list-style-type: none">• Assessment of Data Sources• Methodological Considerations for COVID-19 PHE• Qualitative Interviews• Performance Measure Calculation

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1115 SUD Waiver – Implementation Plan

Program Milestones

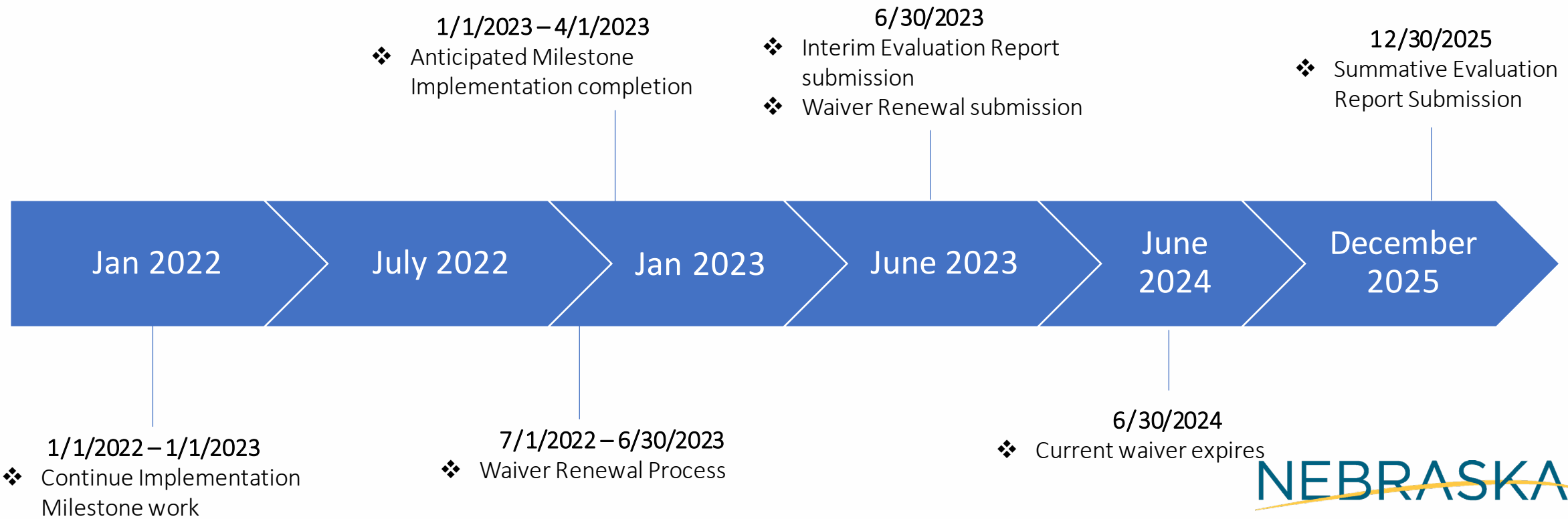
Milestone	Proposed Timeframe	Implementation Activity
<p>Milestone 1: Access to Critical Levels of Care for OUD and other SUDs</p>	<p>Within 12 to 24 months of demonstration approval</p>	<ul style="list-style-type: none"> • Submit a State Plan Amendment (SPA) • Update Regulations and Licensing requirements, including changes to process and application as applicable • Develop billing guidelines including any service limitations • Update MCO contracts • Conduct provider outreach and education on new regulations, licensing, and billing guidelines
<p>Milestone 2: Use of Evidence-based, SUD- specific Patient Placement Criteria</p>	<p>Within 12 to 24 months of demonstration approval</p>	<ul style="list-style-type: none"> • Development of new guidelines and incorporate into the Behavioral Health Services and Utilization Guidelines • Conduct provider education/training
<p>Milestone 3: Use of Nationally Recognized SUD-specific Program Standards to Set Provider Qualifications for Residential Treatment Facilities</p>	<p>Within 12 to 24 months of demonstration approval</p>	<ul style="list-style-type: none"> • Update Regulations and Licensing requirements, including changes to process and application as applicable • Update MCO contracts • Conduct provider outreach and education on new regulations, licensing, and billing guidelines • Develop certification process • Update Regulations and Licensing requirements, including changes to process and application as applicable • Update MCO contract language to require provider education regarding the requirements to facilitate MAT onsite or off site, and on benefits of MAT accessibility, to begin a shift in perspective toward acceptance of MAT as a complementary treatment • Update service descriptions to require access to MAT

1115 SUD Waiver – Implementation Plan, Con't

Program Milestones

Milestone	Proposed Timeframe	Implementation Activity
Milestone 4: Sufficient Provider Capacity at Critical Levels of Care including Medication Assisted Treatment for OUD	Within 12 to 24 months of demonstration approval	<ul style="list-style-type: none"> • Conduct an assessment of current infrastructure and capacity • Add SUD specific provider capacity reporting requirements (to MCO contracts) which include the number of participating providers accepting new patients by level of care and those that offer MAT • Telehealth reporting requirement
Milestone 5: Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and OUD	Within 12 to 24 months of demonstration approval	<ul style="list-style-type: none"> • Development of opioid prescribing guidelines • Development of interventions to prevent opioid abuse • Update and/or development of guidelines for use of naloxone for overdose reversal • Development and implementation of strategies to increase utilization and improve functionality, of prescription drug monitoring programs • Conduct provider training/educations
Milestone 6: Improved Care Coordination and Transitions between Levels of Care	Within 12 to 24 months of demonstration approval	<ul style="list-style-type: none"> • Development of new policy guidelines and incorporate into the Behavioral Health Services and Utilization Guidelines • Update MCO contracts • Conduct provider education/training

1115 SUD Waiver – Future Work



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Discussion & Questions

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Addendum – 1115 SUD Waiver – Implementation Plan

Program Milestones

Milestone	Specifications	Proposed Timeframe	Status: Complete
Milestone 1: Access to Critical Levels of Care for OUD and other SUDs	Coverage of a) outpatient, b) intensive outpatient services, c) medication assisted treatment (medications as well as counseling and other services with sufficient provider capacity to meet needs of Medicaid beneficiaries in the state), d) intensive levels of care in residential and inpatient settings, and e) medically supervised withdrawal management	Within 12 to 24 months of demonstration approval	<ol style="list-style-type: none">1. Submit a State Plan Amendment (SPA)2. Update Regulations and Licensing requirements, including changes to process and application as applicable3. Develop billing guidelines including any service limitations4. Update MCO contracts5. Conduct provider outreach and education on new regulations, licensing, and billing guidelines

1115 SUD Waiver – Implementation Plan, Con't

Program Milestones

Milestone	Specifications	Proposed Timeframe	Status: Complete
Milestone 2: Use of Evidence-based, SUD- specific Patient Placement Criteria	Implementation of requirement that providers assess treatment needs based on SUD-specific, multi-dimensional assessment tools, e.g., the ASAM Criteria, or other patient placement assessment tools that reflect evidence-based clinical treatment guidelines	Within 12 to 24 months of demonstration approval	<ol style="list-style-type: none">1. Development of new guidelines and incorporate into the Behavioral Health Services and Utilization Guidelines2. Conduct provider education/training

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Program Milestones

Milestone	Specifications	Proposed Timeframe	Status: Complete
Milestone 3: Use of Nationally Recognized SUD-specific Program Standards to Set Provider Qualifications for Residential Treatment Facilities	Implementation of residential treatment provider qualifications in licensure requirements, policy manuals, managed care contracts, or other guidance. Qualification should meet program standards in the ASAM Criteria, or other nationally recognized, evidence-based SUD-specific program standards regarding in particular the types of services, hours of clinical care, and credentials of staff for residential treatment settings	Within 12 to 24 months of demonstration approval	<ol style="list-style-type: none"> 1. Update Regulations and Licensing requirements, including changes to process and application as applicable 2. Update MCO contracts 3. Conduct provider outreach and education on new regulations, licensing, and billing guidelines
	Implementation of state process for reviewing residential treatment providers to assure compliance with these standards	Within 24 months of demonstration approval	<ol style="list-style-type: none"> 1. Develop certification process
	Requirement that residential treatment facilities offer MAT on site or facilitate access off site	Within 12 to 24 months of demonstration approval	<ol style="list-style-type: none"> 1. Update Regulations and Licensing requirements, including changes to process and application as applicable 2. Update MCO contract language to require provider education regarding the requirements to facilitate MAT onsite or off site, and on benefits of MAT accessibility, to begin a shift in perspective toward acceptance of MAT as a complementary treatment 3. Update service descriptions to require access to MAT

1115 SUD Waiver – Implementation Plan, Con't

Program Milestones

Milestone	Specifications	Proposed Timeframe	Status: Complete
<p>Milestone 4: Sufficient Provider Capacity at Critical Levels of Care including Medication Assisted Treatment for OUD</p>	<p>Completion of assessment of the availability of providers enrolled in Medicaid and accepting new patients in the critical levels of care throughout the state (or at least in participating regions of the state) including those that offer MAT.</p>	<p>Within 12 months of demonstration approval</p>	<ol style="list-style-type: none"> 1. Conduct an assessment of current infrastructure and capacity 2. Add SUD specific provider capacity reporting requirements (to MCO contracts) which include the number of participating providers accepting new patients by level of care and those that offer MAT 3. Telehealth reporting requirement

1115 SUD Waiver – Implementation Plan

Program Milestones

Milestone	Specifications	Proposed Timeframe	Status: Complete
Milestone 5: Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and OUD	Implementation of opioid prescribing guidelines along with other interventions to prevent opioid abuse	Over the course of the demonstration	<ol style="list-style-type: none"> 1. Development of opioid prescribing guidelines 2. Development of interventions to prevent opioid abuse 3. Update and/or development of guidelines for use of naloxone for overdose reversal 4. Development and implementation of strategies to increase utilization and improve functionality, of prescription drug monitoring programs 5. Conduct provider training/educations
	Expanded coverage of, and access to, naloxone for overdose reversal		
	Implementation of strategies to increase utilization and improve functionality, of prescription drug monitoring programs		

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1115 SUD Waiver – Implementation Plan

Program Milestones

Milestone	Specifications	Proposed Timeframe	Status: Complete
Milestone 6: Improved Care Coordination and Transitions between Levels of Care	Implementation of policies to ensure residential and inpatient facilities link beneficiaries, especially those with OUD, with community-based services and supports following stays in these facilities	Within 12 to 24 months of demonstration approval	<ol style="list-style-type: none">1. Development of new policy guidelines and incorporate into the Behavioral Health Services and Utilization Guidelines2. Update MCO contracts3. Conduct provider education/training

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Links

NE Substance Use Disorder Demonstration site

- <https://dhhs.ne.gov/Pages/Substance-Use-Disorder-Demonstration.aspx>

Centers for Medicare and Medicaid Services – NE 1115 SUD Demonstration site

- <https://www.medicaid.gov/medicaid/section-1115-demo/demonstration-and-waiver-list/82481>

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