January 2, 2019

The Honorable Secretary Alex Azar  
U.S. Department of Health & Human Services  
200 Independence Avenue, S.W.  
Washington, D.C. 20201

RE: Section 1115 Substance Use Disorder Demonstration Waiver Application

Dear Secretary Azar:

On behalf of Ohio, I respectfully submit the State’s Section 1115 Substance Use Disorder Demonstration Waiver proposal.

Like most states, Ohio is experiencing an increase in substance use disorders, including a marked increase in individuals with opioid addictions that result in death, prompting the state to focus on how to increase the availability of treatment services and to encourage greater collaboration with our partner health care providers statewide in addressing the crisis. For the past four years the Ohio Department of Medicaid, in conjunction with our sister agency, the Ohio Department of Mental Health and Addiction Services, has worked with the Centers of Medicare and Medicaid Services to redesign the Medicaid behavioral health benefit package of services to better serve the needs of the citizens of our state. The new service package has afforded mental health and addiction treatment agencies the opportunity to increase provider capacity and to strengthen current efforts to integrate behavioral health and physical health care providing wholistic coverage for those individuals at greatest risk for mental illness and substance use disorders. Central to this work has been a commitment to improve the treatment options for those individuals suffering from substance use addictions. To this end, conversations with CMS and our partner state agencies have lead us to take the next step in our journey to improve substance use treatment options for Ohioans by leveraging opportunities that an 1115 waiver demonstration would offer.

The 1115 Substance Use Disorder Demonstration Waiver will establish milestones and goals for the state to standardize substance use treatment under one clinical addiction treatment criteria, to involve the Medicaid Managed Care Organizations in collaboration with state partners and behavioral health stakeholders in a commitment to improve treatment quality and availability, and to support and educate addiction treatment providers towards successful treatment outcomes.

Your consideration of Ohio’s 1115 Waiver application is appreciated and if you have any questions or need additional information as you review, please do not hesitate to ask.

Sincerely,

James G. Tassie, Interim Director  
Ohio Department of Medicaid

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An Equal Opportunity Employer and Service Provider
Section 1115 Demonstration Waiver Proposal

For Substance Use Disorder Treatment

Submitted by the

Ohio Department of Medicaid
OHIO MEDICAID 1115 DEMONSTRATION PROPOSAL FOR SUBSTANCE USE DISORDER TREATMENT

I. SUMMARY
The Ohio Department of Medicaid (ODM) is requesting an 1115 Demonstration Waiver for substance use disorder (SUD) inpatient and residential treatment in managed care and fee-for-service (FFS) for adults and children. Ohio also requests this Demonstration to ensure a complete American Society of Addiction Medicine (ASAM) level of care (LOCs) array is available as part of an essential continuum of care for Medicaid-enrolled individuals with opioid or other SUDs. This Demonstration waiver is requested to be effective immediately upon approval to use in Institutions for Mental Diseases (IMDs) as a Medicaid-covered setting.

Ohio Medicaid covers all ASAM LOCs 0.5 through 4.0. The Demonstration would permit ODM, largely through our contracted Medicaid managed care programs (MCPs), to maintain critical access to medically-necessary SUD treatment services in the most appropriate setting for the member, regardless of length of stay, as part of a comprehensive continuum of SUD treatment services. Recent Medicaid managed care regulations impose new limitations on ODM’s use of IMDs as alternative settings for State plan behavioral health (BH) services. In Ohio, these regulations will impede access to inpatient and residential SUD treatment services at a critical time in Ohio’s efforts to implement Medicaid BH reform, and provide SUD treatment to confront Ohio’s opioid epidemic.

The Demonstration would also permit ODM, through the FFS program, to provide medically-necessary health care, mental health (MH) and SUD services in the most appropriate setting for individuals who are not eligible for enrollment in managed care. This will permit Ohio to divert individuals from repeat, costly BH admissions at general hospitals to more appropriate and cost-effective community-based BH treatment.

II. BACKGROUND AND THE IMPACT OF THE MANAGED CARE RULE

Background
Modernizing Ohio Medicaid’s system of delivering BH services has been an ongoing and sequential process beginning with elevation of the funding of the BH benefits to the State level in 2012, and fully integrating the BH benefit package of services into the MCP on July 1, 2018. In keeping with the goal of modernization, from August 2014 through the end of 2017, ODM, in collaboration with the Ohio Department of Mental Health and Addiction Services (OhioMHAS), developed and implemented a comprehensive redesign of the BH benefit package of services provided by community MH and SUD service providers. The BH Redesign was implemented on January 1, 2018.
The new benefit service package was divided among five separate State plan authorities, and these State Plan Amendments were approved by the Centers for Medicare & Medicaid Services (CMS) for a January 1, 2018 effective date. This comprehensive restructuring of the BH benefit package of services and the transition of the service package to the managed care delivery system created a comprehensive, coordinated system of care for children and adults. Prior to the January 1, 2018 implementation date for BH Redesign, Ohio had not adopted a complete array of SUD services using a national placement criteria (ASAM) or national provider standards, nor had Ohio required providers of BH services to adopt national correct claim coding. Most importantly for individuals in need of SUD treatment, there were limited options for outpatient, community-based SUD services.

Outpatient Hospital Behavioral Health was also implemented in August 2017. Previously, some Ohio Medicaid hospital providers separately obtained certification from OhioMHAS and were enrolled in Ohio Medicaid as a Community MH agency and/or a SUD treatment program in order to provide services in the community under the former BH benefit package. CMS Medicare provider-based regulations prohibit the establishment of separate business entities within a 35-mile perimeter of the main hospital campus. Ohio informed these providers they should relinquish their separate Medicaid enrollment(s) and permitted them to furnish the new BH Redesign services within their outpatient hospital facilities beginning August 1, 2017. Ohio also opened the new BH service package to other outpatient hospitals, both to general hospitals and to psychiatric hospitals, who had not previously been able to furnish outpatient services. Essentially, this allowed the outpatient hospitals to provide the new BH service package on August 1, 2017.

The new BH Redesign benefit package introduced new evidence-based practices, such as Assertive Community Treatment (ACT) for adults and promising practices, such as Intensive Home-Based Treatment (IHBT) for children with MH conditions, while also modernizing the SUD treatment benefit to align with the ASAM LOCs for outpatient and residential treatment. The introduction of ASAM is intended to increase the use of community-based and non-hospital residential programs, and assured that inpatient hospitalizations are primarily utilized for situations in which there is a need for safety, stabilization, or acute detoxification (ASAM LOC 4).

The implementation of the new BH benefit package resulted in integrated BH in capitated managed care for adults and children on July 1, 2018. Since July 1, 2018, the MCPs are responsible for providing all health care (including BH services) for adults and children, targeting the goal of improved models of care focused on supporting individuals in the community and home outside of institutions, increasing outpatient MH rehabilitation services, introducing a continuum of SUD services aligned with the ASAM criteria, and de-emphasizing the role of hospitals and large institutions (IMDs) in the delivery of covered services. Note: the MyCare Duals Demonstration plans have been responsible for all BH services, whether furnished by independent
practitioners in the community or by community BH agencies certified by OhioMHAS, since their inception on May 1, 2014.

The Ohio Medicaid MCP currently contracts with five MCPs: Buckeye Community Health Plan (Buckeye), CareSource, Molina Healthcare (Molina), Paramount Advantage (Paramount), and UnitedHealthcare Community Plan (United). For the MyCare Ohio program, ODM contracts with four of those plans (excludes Paramount), plus Aetna Better Health of Ohio (Aetna).

Today, Ohio requires most Medicaid/Children’s Health Insurance Program (CHIP) beneficiaries to enroll in capitated managed care. There are a few recipients (≈11%) who receive services under the FFS delivery system. Approximately 89% of Ohio Medicaid/CHIP beneficiaries are enrolled in either Ohio Medicaid MCP or MyCare Ohio, a regional MCP for Medicare-Medicaid dual eligibles. This includes 100% of beneficiaries in Ohio’s adult expansion (extension adults) who receive the alternative benefit plan (aligned with the regular State Medicaid plan) and 97% of beneficiaries in Ohio’s CHIP program (Healthy Start), which is a Medicaid expansion program.

**The Impact of the Medicaid Managed Care Final Rule**

As stated previously, ODM has designed the current integrated MCP, including SUD services, with the expectation that Federal Medicaid policy would permit the use of IMDs as cost-effective alternative services. These settings are a crucial part of Ohio’s SUD treatment provider network in order to maintain critical access to SUD residential treatment for Ohio Medicaid enrollees.

On May 6, 2016, CMS published new managed care regulations, which permit states to use Federal Medicaid funds for capitation payments to managed care plans for persons receiving treatment in an IMD “in lieu of” other services covered under the Medicaid State Plan. Under this regulation, Federal payments for IMD services are limited to 15 days per month for individuals ages 21-64. In addition, IMD services must be medically appropriate and cost-effective and enrollees cannot be required to accept IMD services “in lieu of” other services covered under the Medicaid State Plan.

Ohio Medicaid is requesting this Demonstration in order to ensure Federal funding for SUD residential treatment and other health care services for people residing in facilities that meet the IMD definition. Seeking an 1115 Demonstration is the logical next step, following successful redesign implementation and managed care integration to continue to ensure Ohio’s Medicaid beneficiaries have access to the entire continuum of ASAM LOCs. Ohio has a strong foundation for this Demonstration request already in place due to the redesign and managed care integration completed July 1, 2018.

**III. DEMONSTRATION OBJECTIVES**

The objective of this Demonstration is to maintain critical access to cost-effective SUD treatment services for Ohio Medicaid enrollees and continue the delivery system
improvements for these services to provide more coordinated and comprehensive SUD treatment by Medicaid.

This Demonstration seeks to improve outcomes for Medicaid individuals diagnosed with SUDs by maintaining critical access to SUD treatment services, including inpatient and residential SUD treatment in IMDs, as part of a full continuum of ASAM LOCs aligned treatment services. Under BH Redesign, Ohio designed a comprehensive, integrated BH benefit that includes cost-effective alternatives to State Plan residential treatment settings by IMDs. However, recent changes to Medicaid managed care regulations and existing IMD limitations in FFS create barriers to ensuring individuals are able to access SUD treatment at a LOC appropriate to their needs using the ASAM criteria. This Demonstration seeks authority so Federal Medicaid managed care restrictions on IMDs as SUD treatment settings do not disrupt the Medicaid SUD treatment continuum in Ohio by inadvertently reducing critical access to SUD treatment recently expanded through BH Redesign.

Implementing the limitations of the Medicaid managed care final rule has the potential to hinder Ohio’s progress with BH reform by reducing access to community-based residential treatment services, creating a critical access problem in the State for SUD treatment services, and increasing costs to the State and Federal governments. There may not be enough SUD residential treatment programs in Ohio with 16 or fewer treatment beds to address the extent of the opioid epidemic in the State. This is particularly true since the State expanded Medicaid eligibility (effective January 2014) and such services are available to more than 700,000 Expansion-eligible individuals. Restricting Medicaid funding at this juncture would cripple the State’s ability to address the surge of SUD treatment needs for Medicaid enrollees.

The Demonstration will also remove Medicaid payment barriers in FFS for SUD residential treatment for individuals in need of these services. By preserving critical access to residential treatment capacity, Ohio will be able to continue to provide an effective SUD treatment continuum of care with interventions capable of meeting individuals’ changing needs for various ASAM LOCs. As individuals move throughout the continuum in their SUD recovery, they may need to transition to LOCs of greater or lesser intensity.

IV. Comprehensive Description of Strategies for Addressing Goals and Milestones

The State’s initial approach to key system reform milestones will be addressed in the comprehensive Implementation Plan submitted concurrently with this Demonstration request. The Implementation Plan addresses system reforms required in the 2017 State Medicaid Director’s Letter and outlines a path toward an IMD exception using the 1115 Demonstration authority. A brief summary of the State’s current environment for each milestone is listed below.
**Milestone 1: Access to Critical LOCs for Opioid Use Disorder (OUD) and Other SUDs**
Ohio’s OUD and SUD treatment systems includes early intervention, coverage of outpatient, intensive outpatient and partial hospitalization services, MAT (medications, as well as counseling and other services with sufficient provider capacity to meet needs of Medicaid beneficiaries in the State), intensive LOCs in residential and inpatient settings, and medically supervised withdrawal management.

The State ensures sufficient coverage by contractually requiring the MCPs to demonstrate network adequacy for services. If services are unavailable within the specific region, the MCP is required to contract for services with providers outside the defined geographical boundaries.

**Milestone 2: Use of ASAM Placement Criteria**
The State requires all SUD treatment providers to assess and provide services using the ASAM criteria. ODM requires SUD treatment providers enrolled in Medicaid to use multi-dimensional assessments based on the six dimensions of care as outlined in ASAM. In addition, for providers who must be certified by OhioMHAS, the ASAM criteria is required as a condition of certification.

Ohio Administrative Code (OAC) rule 5160-27-09 describes SUD treatment services provided to Medicaid recipients regardless of delivery system. This regulation requires the use of the ASAM treatment criteria for addictive, substance related, and co-occurring conditions for admission, continued stay, discharge, or referral to each LOC.

The current ODM MCP provider agreement requires all plans to follow the prior authorization standards established under BH Redesign for both the FFS and managed care delivery systems. On and after July 1, 2019, SUD services provided in the managed care and FFS delivery systems will comply with the ASAM criteria for all prior authorization and utilization review decisions resulting in continued continuity across the Medicaid delivery systems. The MCP provider agreement will be updated to emphasize the required use of the ASAM criteria for all SUD services regardless of site, provider type, or LOC. MCPs prior authorize SUD residential treatment services for their members while SUD residential treatment for individuals enrolled in the FFS delivery system is prior authorized by ODM or its designee. This will ensure members have access to SUD treatment at the appropriate LOC and interventions are appropriate for each person’s diagnosis and LOC.

**Milestone 3: Use of ASAM Program Standards for Residential Provider Qualifications**
ODM and OhioMHAS require Medicaid participating providers of SUD treatment services to use the ASAM criteria. These requirements apply to SUD residential treatment service providers under both the managed care and FFS delivery systems. OhioMHAS’ certification regulation in OAC rule 5122-29-09 require residential,
withdrawal management, and inpatient SUD treatment services to be provided in accordance with the ASAM LOC 3. ODM’s rule, 5160-27-09, also requires residential services/inpatient services to be provided in accordance with ASAM LOC 3. ASAM’s LOC 3 and associated sub levels are to be provided as appropriate to the needs of the individual being served and as published in The ASAM Criteria, Third Edition, 2013®.

In the future, Medicaid policy manuals will be modified to include more detail about the ASAM residential program requirements including the particular types of practitioner services, hours of clinical care, and credentials of staff for residential treatment. This will include a requirement that residential treatment providers offer MAT on-site or facilitate access off-site with a MAT provider not associated with the residential treatment owner. Medicaid will also implement a process for reviewing residential treatment providers to ensure compliance with these requirements and for IMD determination.

Milestone 4: Provider Capacity of SUD Treatment including MAT
As part of preparing for the inclusion of BH Redesign benefit package in MCP contracts on July 1, 2018, ODM conducted readiness reviews of the MCPs to ensure the panel standards required of plans were met. This included ensuring each MCP had at least a minimum number of comprehensive Alcohol and Drug treatment providers in each region. If a covered Medicaid service is not available in network, the MCP must arrange for that service to be provided out-of-network at no additional charge to the member.

Ohio has 4,135 SUD residential treatment beds across 178 OhioMHAS-certified SUD residential, withdrawal management, and inpatient SUD service programs that might meet the definition of an IMD.

The estimated number of residential days for each residential LOC based on 2014 data was estimated to be:

<table>
<thead>
<tr>
<th>STATE FISCAL YEAR 2014</th>
<th>ADULT DAYS</th>
<th>CHILD DAYS</th>
<th>TOTAL ESTIMATED DAYS</th>
</tr>
</thead>
<tbody>
<tr>
<td>ASAM 3.1</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>ASAM 3.2 Withdrawal Management</td>
<td>371</td>
<td>35</td>
<td>406</td>
</tr>
<tr>
<td>ASAM 3.3 (adults only)</td>
<td>22,061</td>
<td>N/A</td>
<td>22,061</td>
</tr>
<tr>
<td>ASAM 3.5</td>
<td>70,759</td>
<td>39,171</td>
<td>109,930</td>
</tr>
<tr>
<td>ASAM 3.7</td>
<td>5,404</td>
<td>1,868</td>
<td>7,272</td>
</tr>
<tr>
<td>ASAM 3.7 Withdrawal Management</td>
<td>3,947</td>
<td>563</td>
<td>4,510</td>
</tr>
<tr>
<td>Total</td>
<td>102,542</td>
<td>41,637</td>
<td>144,179</td>
</tr>
</tbody>
</table>

The State expects to be able to develop an assessment of the availability of the providers enrolled in Medicaid and the ability to accept new patients in each of the SUD
residential LOCs within 12 months of Demonstration approval. This assessment will indicate whether facilities accept clients funded through managed care by plan, FFS, or both delivery systems.

**Milestone 5: Implementation of OUD Comprehensive Treatment and Prevention Strategies**

**Opioid Prescribing Guidelines and Other Interventions to Prevent Opioid Abuse**

To address the opioid crisis (which is discussed in the next major section below), Ohio has implemented five sets of prescribing guidelines to prevent opioid abuse. Prescribing guidelines addressed the easiest sources of uncoordinated prescription medications through the emergency departments. Tighter guidelines for patients requiring the highest doses of prescription opioids addressed issues for those already taking opioid medications. Additional interventions included:

2. Eliminating the possibility of calling in Schedule II drugs such as hydrocodone (Vicodin®).
3. Reducing the number of patients starting their first opioid.
4. Requiring Medicaid MCPs to put edits in place within their pharmacy programs to support prescribing guidelines.
5. Requiring MCPs to implement Medication Therapy Management for those with problematic polypharmacy and a Coordinated Services Program to provide care management services for members who overuse or misuse services.

Over the course of the development of these guidelines and rules, the State of Ohio was able to achieve a 28% reduction in solid doses of opioids prescribed from 196 million doses per quarter in Q2 2013 to 136 million in Q2 2017.\(^1\) For acute pain, prescriptions fell from 70 million per quarter to 51 million over that same time frame with a reduction in number of patients with any opioid falling from 1.29 million per quarter to 948,000 per quarter.

These initiatives have resulted in direct impacts on Medicaid prescribing. The Medicaid opioid claims have reached a low of 116,348 claims in December 2017.

\(^1\) OARRS data, Ohio’s Opioid Epidemic, The Medicaid Experience & Progress to Date, Agency Briefing on Opioids October 2017 SPA-5, Mary Applegate, MD, FAAP, FACP, Slide 33.
Ohio is one of the first states to realize a reduction in opioid deaths related to prescription drugs in the midst of escalating overall deaths driven by illicit drug use. Of all unintentional drug overdose deaths, the percentage of prescription opioid-related deaths in Ohio declined for a fifth straight year in 2016, and the number of these deaths declined 15.4% from 667 in 2015 to 564 in 2016 — the fewest since 2009.2

Expanded Coverage of, and Access to, Naloxone for Overdose Reversal
Ohio has taken steps to prevent drug overdose deaths through the expanded availability and use of the opiate overdose reversal drug Naloxone. One of the most effective steps for expanding coverage included permitting pharmacists to dispense Naloxone without a prescription in 2015. To assist pharmacies, the State of Ohio Board of Pharmacy developed a dedicated web page, [www.pharmacy.ohio.gov/naloxone](http://www.pharmacy.ohio.gov/naloxone), which features helpful resources including a guidance document, sample protocol, and a listing of all participating pharmacies. The Pharmacy Board also offers printed, no-cost patient educational materials to any participating pharmacy. By 2017, more than 1,600 Ohio pharmacies in 87 counties offer Naloxone without a prescription.

Additionally, as part of an early adoption of components of the BH Redesign project, beginning January 1, 2017, Ohio’s opioid treatment programs are now able to administer and dispense Naloxone and their physicians to personally furnish Naloxone in accordance with the State of Ohio Board of Pharmacy requirements.

Increasing Utilization and Improving Functionality of Prescription Drug Monitoring Programs
Ohio first mandated use of the Ohio Automated Reporting Rx System (OARRS), the State’s prescription drug monitoring program by prescribers in 2011, with additional provisions added in 2013. OARRS is a tool to track the dispensing and personal furnishing of controlled prescription drugs to patients. OARRS is designed to monitor this information for suspected abuse or diversion (i.e., channeling drugs into illegal use), and can give a prescriber or pharmacist critical information regarding a patient’s controlled substance prescription history. This information can help prescribers and pharmacists identify high-risk patients who would benefit from early interventions.

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2 Mortality data can be found at the following website: [http://publicapps.odh.ohio.gov/EDW/DataBrowser/Browse/Mortality](http://publicapps.odh.ohio.gov/EDW/DataBrowser/Browse/Mortality)
Since the latest mandate in 2013, the use of the OARRS system has grown. In 2017, the OARRS reported a record high of 265,242 requests by prescribers and pharmacists in a single day. By comparison, the single day high in 2016 was 86,129 prescriber and pharmacist requests. In August 2018, OARRS reported an average of more than 599,000 requests per weekday – more than double the previous year’s high.

OARRS has also documented that fewer Ohioans are using multiple prescribers or pharmacies (i.e., doctor shopping). In 2017, data from OARRS found the number of individuals using more than five prescribers for prescription opiates has decreased 88% since 2011. Similarly, the number of Medicaid members with four or more pharmacies has continuously dropped since January 2017.

The State of Ohio plans to leverage opportunities described in SMD Letter 16-003 to help professionals and hospitals eligible for Medicaid Electronic Health Record (EHR) Incentive Payments connect to other Medicaid providers through the integration of OARRS into electronic medical records and pharmacy dispensing systems. All hospitals and pharmacies now have the ability to have OARRS integrated into their EHRs and Pharmacy management systems. Nearly half of physicians now have integrated access to OARRS. This initiative will allow the State to meet the following objectives:

- Further reduce the number of individuals who doctor shop.
- Provide health care providers critical information regarding a patient’s controlled substance prescription history and expand collection of other data sources to support clinical decision-making.
- Support clinician interventions for patients exhibiting high-risk behaviors.

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• Assist providers in achieving the medication reconciliation meaningful use objective and measure.\(^5\)

An additional goal of this integration initiative is to provide as many avenues as possible for an authorized health care provider to access Ohio’s Prescription Drug Monitoring Program, including integrated access through Health Information Exchanges (HIEs). In fact, Ohio’s two largest HIEs, CliniSync and The Health Collaborative (HealthBridge), have already been integrated with OARRS under this initiative.

**Milestone 6: Improved Care Coordination and Transition between LOCs**
Ohio has multiple interventions for coordinating the care of individuals with SUD and transitioning between LOCs, including but not limited to, targeted case management, facility discharge requirements, care coordination in MCP contracts, and the proposed BH Care Coordination Program, also implemented in the managed care delivery system.

**V. Comprehensive Plan to Address Opioid Abuse and Assessment of How the Demonstration Complements and Does Not Supplant Other State Activities**
The Governor’s Cabinet Opiate Action Team (GCOAT) comprises all cabinet-level agencies and is charged with the coordination of all activities addressing Ohio’s escalating opioid crisis. This Demonstration is being coordinated with that larger effort and will complement and not supplant State activities called for or supported by other Federal authorities and funding streams.

Over the last several years, ODM has played a crucial role in the GCOAT. GCOAT’s interventions increased as opioids deaths rose from 1,914 in 2012 to 4,050 in 2016.\(^6\) See Figure 1 for maps outlining the growth in drug-related deaths in Ohio counties between calendar year (CY) 2012 and CY 2017.

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\(^5\) Stage 3 of Meaningful use consolidates Medication reconciliation into the Health Information Exchange Objective. The objective requires the Eligible Professional provides a summary of the care record when transitioning or referring their patient to another setting of care, receives or retrieves a summary of care record upon the receipt of a transition or referral or upon the first patient encounter with a new patient, and incorporates summary of care information from other providers into their EHR using the functions of CEHRT. Providers must attest to all three measures and must meet the threshold for at least two measures to meet the objective.

\(^6\) Mortality data can be found at the following website:  
http://publicapps.odh.ohio.gov/EDW/DataBrowser/Browse/Mortality
Figure 1: Map of the rate of Drug-Related Overdose Deaths per 100,000 people in Ohio counties in 2017.

Number of Unintentional Opioid-Related Overdose Deaths

Quintile

- 0 - 3
- 4 - 6
- 7 - 9
- 10 - 21
- >=22

ODM has been particularly assertive in this work as the Centers for Disease Control and Prevention (CDC) reported Medicaid members were prescribed opioids at more than twice the rate as those with commercial insurance and were at greater risk for opioid abuse and death.8

ODM efforts have primarily focused on the five prongs of the Health and Human Services (HHS) Opioid Strategy (see Figure 2 for a visual of the HHS Opioid strategy) including:

1. Improving access to prevention, treatment, and recovery support services.
2. Targeting distribution of overdose-reversing drugs.
3. Advancing the practice of pain management.

7 “Governor’s Cabinet Opiate Action Team Dashboard” (slide 9)
4. Supporting cutting-edge research.
5. Strengthening timely public health data and reporting.

Figure 2: HHS Opioid strategy

VI. DELIVERY SYSTEM
This Demonstration will not change the current FFS and managed care delivery systems. MCPs and MyCare Ohio Plans will continue to operate as approved in ODM’s Section 1932(a) State Plan authority for managed care and concurrent 1915(b) waivers.

VII. ELIGIBILITY
Medicaid eligibility requirements will not differ from the approved Medicaid State Plan.

VIII. BENEFITS
Benefits will not differ from the approved Medicaid State Plan. With the CMS approval of SPA 17-013, the State began reimbursing a full array of services using the ASAM criteria effective January 1, 2018. Ohio’s Medicaid State Plan and MCP contracts currently cover a full-range of community-based care designed to prevent institutionalization. The benefit package developed over the past several years in close coordination and consultation with CMS and the Substance Abuse and Mental Health Services Administration best practice guidelines includes:

- Outpatient and residential SUD treatment, including withdrawal management, consistent with ASAM LOCs,
- Community-based MH evidence-based practices such as ACT, and
• Promising practices such as IHBT.

The Demonstration will permit Medicaid recipients in Ohio with SUDs to receive high-quality, clinically-appropriate State Plan-approved SUD treatment services in outpatient and community-based settings, as well as in residential and inpatient treatment settings that qualify as an IMD.

IX. COST-SHARING
Cost-sharing requirements under the Demonstration will not differ from the approved State Plan requirements.

X. HYPOTHESIS AND EVALUATION
The Demonstration will test whether Ohio can enhance the effectiveness of the SUD treatment system in Medicaid by maintenance and expansion of SUD residential treatment services as part of a coordinated continuum of care, resulting in increased access and improved health outcomes for individuals with SUD. This approach is particularly relevant given the needs of the Medicaid Expansion population, which has historically been underserved.

Through a contract with an independent contractor, Ohio will conduct an independent evaluation to measure and monitor the outcomes of the SUD Demonstration. The evaluation will focus on the subset of milestones of the Demonstration with performance measures as outlined below. The researchers will assess the impact of providing the full continuum of SUD treatment services, particularly residential treatment, emergency department utilization, inpatient hospital utilization, and readmission rates to the same LOC or higher. It will also assess the impact on the drug overdose death rate. A mid-point evaluation will be completed along with an evaluation at the end of the waiver. The evaluation is designed to demonstrate achievement of the Demonstration’s goals, objectives, and metrics. As required by CMS, the evaluation design will include the following elements:

1. General Background Information
2. Evaluation Questions and Hypotheses
3. Methodology
4. Methodological Limitations
5. Attachments

The details of the evaluation design will be developed in concert with CMS during the Demonstration negotiation process.

Providing services in a less restrictive and more cost-effective setting for the SUD population is critical to the evolution of the State’s BH network. ODM proposes to
evaluate the Demonstration’s success and will include an evaluation of the following milestones, research questions, and hypotheses:

**Milestone 1: Improve access to critical LOCs for OUD and other SUDs for individuals in Medicaid.** Critical LOCs are defined as early intervention, outpatient services, intensive outpatient and partial hospitalization services, residential and inpatient services, withdrawal management and MAT.

**Research Question:** Has access to critical LOCs as defined below improved in Medicaid? Since the development of the 1115 SUD waiver, are more individuals receiving services at critical LOCs when compared to the numbers prior to the waiver onset?

**Hypothesis:** The 1115 SUD Demonstration will increase access to the specified critical LOCs for individuals in Ohio Medicaid compared to prior to the waiver.

**Performance Measures:**
- Number and percentage of individuals enrolled in Medicaid with a SUD diagnosis.
- Number and percentage of individuals enrolled in Medicaid using each of the following critical LOCs: early intervention, outpatient services, intensive outpatient and partial hospitalization services, residential and inpatient services, withdrawal management and MAT.
- Number and percentage of individuals enrolled in Medicaid using any SUD treatment service, facility claim, or pharmacy claim.
- Number and percentage of individuals enrolled in Medicaid treated in an IMD for SUD and the average length of stay in the IMD.

Note: There are no research questions, hypotheses, or performance measures for Milestones 2 and 3.

**Milestone 4: Improve provider capacity at critical LOCs including MAT for OUD in Medicaid.**

**Research Question:** Has the availability of providers in Medicaid and accepting new patients, including MAT, improved under the demonstration?

**Hypothesis:** The 1115 SUD Demonstration will increase provider capacity as defined below for SUD treatment at critical LOCs for individuals in Ohio Medicaid.

**Performance Measures:**
- Number and percentage of providers enrolled in Medicaid and qualified to deliver SUD services.
- Number and percentage of providers enrolled in Medicaid and qualified to deliver SUD services and meet the standards to provide buprenorphine or methadone as part of MAT.
- Number and percentage of providers enrolled in Medicaid and providing each of the following critical LOCs: early intervention, outpatient services, intensive outpatient and partial hospitalization services, residential and inpatient services, withdrawal management and MAT.
### Milestone 5: Improvements in comprehensive treatment and prevention strategies to address opioid abuse and OUD for individuals in Medicaid.

**Research Question:** Will improvements in treatment and prevention strategies in Medicaid improve outcomes of individuals with SUD in Medicaid as demonstrated by: more effective initiation of treatment, decrease use of opioid at high dosages in persons without cancer, reduce use of multiple opioids from multiple providers, reduce concurrent use of opioids and benzodiazepines, improve continuity of pharmacotherapy for OUD, decreased overdose deaths and access to preventive/ambulatory services?

**Hypothesis:** The 1115 SUD Demonstration will improve outcomes for individuals in Ohio Medicaid under the following measures:

- AOD IET.
- Use of opioids at high dosage in persons without cancer.
- Use of opioids from multiple providers in persons without cancer.
- Concurrent use of opioids and benzodiazepines.
- Continuity of pharmacotherapy for opioid use disorder.
- Follow-up after discharge from the emergency department for MH or alcohol or other drug dependence.
- Rate of overdose deaths among adult Medicaid beneficiaries in the State.
- Access to preventive/ambulatory health services for adult Medicaid beneficiaries with SUD.

**Performance Measures:**

- AOD IET [NCQA, NQF #0004, Medicaid Adult Core set].
- Use of opioids at high dosage in persons without cancer [PQA, NQF #2940, Medicaid Adult Care set].
- Use of opioids from multiple providers in persons without cancer [PQA, NQF #2950].
- Concurrent use of opioids and benzodiazepines [PQA].
- Continuity of pharmacotherapy for opioid use disorder [RAND, NQF #3175].
- Follow-up after discharge from the emergency department for MH or alcohol or other drug dependence [NCQA, NQF #2605, Medicaid Adult Core set].
- Rate of overdose deaths among adult Medicaid beneficiaries in the State. Report the cause of death as specifically as possible (e.g., prescription versus illicit opioid).
- Access to preventive/ambulatory health services for adult Medicaid beneficiaries with SUD.

### Milestone 6: Improved care coordination and transition between LOCs for individuals in Medicaid.

**Research Question:** Has the Demonstration impacted access to care for individuals with SUD in Medicaid by linking beneficiaries with community-based services and supports following stays in residential and inpatient facilities and reducing re-admission rates for treatment?

**Hypothesis:** The 1115 SUD Demonstration will improve follow-up after discharge from emergency departments and decrease re-admissions for individuals in Ohio Medicaid with SUD.

**Performance Measures:**

- Follow-up after discharge from the emergency department for mental health or alcohol or other drug dependence [NCQA, NQF #2605, Medicaid Adult Core set].
- Number and percentage of re-admissions among beneficiaries with SUD.
XI. LIST OF WAIVER AND EXPENDITURE AUTHORITIES

Waiver Authority
None. The waivers of freedom of choice and comparability are applied via the approved Section 1915(b) Ohio waivers and approved Section 1932(a) State Plan.

Expenditure Authority
ODM is requesting expenditure authority under Section 1115 to claim as medical assistance.

  • Residential Treatment for Individuals with SUDs.
    Expenditures for otherwise covered services furnished to otherwise eligible individuals who are receiving treatment and withdrawal management services for SUDs in an IMD.

XII. ESTIMATE OF EXPECTED INCREASE/DECREASE IN ANNUAL ENROLLMENT AND ANNUAL AGGREGATE EXPENDITURES

Medicaid expenditures and enrollment under managed care are not expected to change as a result of this Demonstration. This Demonstration would permit Ohio to reimburse SUD treatment services, including services for individuals who receive services in an IMD, which is generally a cost-effective alternative setting.

Medicaid expenditures and enrollment under FFS are also not expected to change as a result of this Demonstration. Utilization of State Plan-covered services for individuals who receive SUD treatment services in an IMD will only be authorized if ODM, or its designee, determines the admission to a residential setting is appropriately consistent with ASAM placement criteria. This will be cost-effective compared to inpatient hospital admissions.

Budget Neutrality
Milliman, Inc. (Milliman) was engaged by the State of Ohio, Department of Medicaid (ODM) to develop the response to the Budget Neutrality Form section for the Section 1115 Medicaid Demonstration Waiver Application (1115 Waiver) for SUD residential services. Budget neutrality is a comparison of without waiver expenditures (WoW) to with waiver expenditures (WW). CMS recommends two potential methodologies of demonstrating budget neutrality:

1. Per Capita Method: Assessment of the per member per month (PMPM) cost of the Demonstration
2. Aggregate Method: Assessment of both the number of members and PMPM cost of the Demonstration

Budget neutrality for the 1115 Waiver will be demonstrated through the use of the per capita method. The budget neutrality projections were developed using CMS budget
neutrality requirements. The SUD residential budget neutrality worksheets prepared by Milliman are attached as Attachment A.

Milliman has relied upon certain data and information provided by ODM in the development of the estimates contained in the Budget Neutrality Worksheet. Milliman has relied upon the ODM for the accuracy of the data and accepted them without audit. To the extent that the data provided are not accurate, the results of this analysis may need to be modified to reflect revised information.

Differences between our projections and actual amounts depend on the extent to which future experience conforms to the assumptions made for this analysis. It is certain that actual experience will not conform exactly to the assumptions used in this analysis. Actual amounts will differ from projected amounts to the extent that actual experience deviates from expected experience. It should be emphasized that the values in the Budget Neutrality Form are a projection of future costs based on a set of assumptions. Results will differ if actual experience is different from the assumptions contained in this analysis.

XII. PUBLIC NOTICE AND TRIBAL CONSULTATION

Public Notice Process
Ohio used the following process to provide notice to the public about the opportunity to comment on the proposed SUD 1115 demonstration waiver.

- **Web posting** – On October 24, 2018, Ohio posted a public notice summary with the draft waiver on ODM’s website at [https://medicaid.ohio.gov/RESOURCES/Public-Notices/Substance-Use-Disorder-Treatment-Waiver-Proposal](https://medicaid.ohio.gov/RESOURCES/Public-Notices/Substance-Use-Disorder-Treatment-Waiver-Proposal). An abbreviated version of the public notice with a link to the full notice was published online in the Register of Ohio and accessible at the same link.

- **Electronic Mailing** – Individuals requesting the waiver were emailed a copy of the waiver.

Ohio provided the following methods for the public to provide input on the draft waiver:

- **Email inbox** – Ohio established a dedicated email box named sud1115waiver@medicaid.ohio.gov, which received a total of 6 emails by the November 25, 2018 deadline.
- **Mail** – Ohio provided a US Postal Service address for submission of public comments: Substance Use Disorder Treatment Demonstration Waiver, Bureau of Health Plan Policy, Ohio Department of Medicaid, 50 W. Town Street, Suite 400, Columbus, OH 43215. A total of 19 comments were received via this method by the November 25, 2018 deadline.
- **Courier/Drop Off** – Ohio provided the Department street address for delivery of comments. 0 comments were dropped off at the Ohio Department of Medicaid’s offices by the November 25, 2018 deadline.
- **Fax** – Ohio provided a fax number (614) 995-1301 for the submission of public comments. 0 comments were received through the fax line by the November 25, 2018 deadline.

- **Public Testimony** – Ohio held two public hearings on November 15, 2018 and November 20, 2018. The first hearing was held during a Medical Care Advisory Committee and held at the Department of Medicaid in Columbus, Ohio. The second hearing was held in Maumee, Ohio. In both hearings, the public was invited to provide comments on the draft waiver. Individuals were also able to view the second hearing proceedings via teleconference/webinar for the Columbus hearing.

At the public hearings, a presentation was given by ODM and OhioMHAS leadership which provided an overview of the proposed SUD 1115 demonstration. Approximately 25 individuals attended the first hearing, at which 0 testified. Approximately 2 individuals attended the second hearing, at which 0 testified.

**Summary of Public Comments**
A summary of the feedback from commenters is provided in Attachment B.

**Tribal Consultation**
Ohio does not have any Federally-recognized tribes.
Attachment A: Budget Neutrality

The 1115 Waiver SUD residential services budget neutrality worksheets are below. The rest of this section documents the supporting data and methodology included in the worksheets using guidance provided by CMS in the Budget Neutrality Form.

I. WoW and WW Projections for Historical Medicaid Populations

A. Recent Historical Actual Data
Ohio has provided actual historical data in two separate Medicaid eligibility groups (MEGs) for the managed care eligible population and those enrolled in the FFS program. The historical data includes SUD treatment in residential settings for all Medicaid eligible beneficiaries. We have included member months where a beneficiary received SUD treatment of any length. For each of these member months, we have reflected all (both SUD and non-SUD) of their corresponding Medicaid-eligible service expenditures within the month.

Effective January 1, 2018, ODM submitted a 1932 State Plan Amendment for their BH Redesign, which included a full spectrum of SUD treatment following ASAM criteria. This new BH benefit included SUD treatment in a residential facility under specific procedure codes. Prior to January 1, 2018, SUD treatment in a residential facility was not clearly defined. Instead, SUD residential facilities billed for each specific SUD treatment separately (e.g. assessments, counseling, therapy, etc.). As a result, we have limited our historical experience to the first quarter of CY 2018, as it more appropriately reflects the projected PMPM cost during the five-year Demonstration.

B. Bridge Period
The bridge period is April 1, 2018 to June 30, 2018 (3 months). Demonstration Year (DY) 00 reflects the July 1, 2018 to June 30, 2019 time period, with DY 01 set to begin on July 1, 2019. We have applied 10.5 months of aging to get from the midpoint of the historical data (February 15, 2018) to the midpoint of DY 00 (January 1, 2019).

C. WoW and WW Trend Rates, PMPM Costs, and Member Months
Based on CMS guidance regarding SUD 1115 Waivers, both the WoW and WW scenarios equal one another.

As discussed above, ODM implemented a new SUD service array on January 1, 2018, including SUD treatment at residential facilities. We have projected the SUD facility experience during the five-year Demonstration by applying a trend to both the member months receiving SUD facility treatment and the corresponding total PMPM cost. The projected PMPM cost trend reflects the President’s budget trend (4.5%). Based on discussions with ODM regarding ramp-up in SUD facility treatment under the BH Redesign and new SUD facility providers coming online to
provide SUD treatment, we are assuming a 10% annual caseload trend over the five-year Demonstration.

II. Cost Projections for New Populations
Not applicable.

III. Disproportionate Share Hospital Expenditure Offset
Not applicable.

IV. Summary of Budget Neutrality
Appendix I illustrates the 1115 Waiver budget neutrality spreadsheet, as well as the supplemental SUD budget neutrality spreadsheet, which both include the following applicable tabs:

   i. SUD Historical
   ii. SUD Without-Waiver
   iii. SUD With Waiver
   iv. SUD Summary (of Budget Neutrality)
   v. SUD Caseloads

V. Additional Information to Demonstrate Budget Neutrality
We do not believe there is any other information necessary for CMS to complete its analysis of the budget neutrality submission.
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### SUD Without Waiver Costs

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PB Trend: 4.5%

### SUD Residential Services

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<th>56,482</th>
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<td>4.5%</td>
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<td>$8,760</td>
<td>$9,155</td>
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<td>$9,997</td>
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<td>Total Expenditure</td>
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<td>$391,313,853</td>
<td>$449,815,322</td>
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#### MEG 2

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<td>$7,415</td>
<td>$7,749</td>
<td>$8,098</td>
<td>$8,462</td>
</tr>
<tr>
<td>Total Expenditure</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>$20,702,232</td>
<td>$23,797,210</td>
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## SUD with Waiver Costs

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<th>TOTAL WW</th>
<th>TRENDS</th>
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## SUD Residential Supplemental BN Tests

### Without-Waiver Total Expenditures

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<th>DY 04</th>
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<td>$449,815,322</td>
<td>$517,062,439</td>
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<td>$683,220,136</td>
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<td>$23,797,210</td>
<td>$27,354,888</td>
<td>$31,444,455</td>
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<tr>
<td>TOTAL</td>
<td>$412,016,084</td>
<td>$473,612,532</td>
<td>$544,417,327</td>
<td>$625,807,461</td>
<td>$719,365,540</td>
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### With-Waiver Total Expenditures

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<th>DY 02</th>
<th>DY 03</th>
<th>DY 04</th>
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<td>$719,365,540</td>
<td>$2,775,218,946</td>
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</table>

**Net Overspend**

|               | $0            | $0            | $0            | $0            | $0            | $0                    |

### Trend Rates & PMPMs from Table Below to 'SUD Supplemental Budget Neutrality Test(s)' STC

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<td>$8,760</td>
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<td>3,530</td>
<td>3,883</td>
<td>4,271</td>
</tr>
</tbody>
</table>
Attachment B: Summary of Public Comments

Waiver Support

Comment: We believe granting this waiver will ensure that patients can access care at the most appropriate setting as part of a comprehensive continuum of treatment services. Ohio is facing a critical time in combating the opioid crisis and the implementation of this waiver will be a positive step forward in the state’s efforts to develop creative care solutions.

   Thank you for your comment and support.

Comment: The flexibility under the demonstration will allow many more Ohioans gain access to treatment while holding the state accountable in reporting data, ensuring cost neutrality, and meeting CMS required milestones. Most importantly, the waiver will expand capacity of the system during the demonstration period and will reduce wait times for SUD treatment services as Ohio battles the opioid crisis.

   Thank you for your comment and support.

Prior Authorization

Comment: Will Ohio Medicaid be requiring prior authorization for all levels of care for SUD treatment? Prior Authorization can be untimely and costly.

   Pending CMS approval, under the 1115 Substance Use Disorder waiver, providers will be required to use patient placement criteria and assess treatment needs based upon Substance Use Disorder specific, multi-dimensional assessment tools in accordance with the ASAM levels of care. Providers must use the ASAM criteria for level of care placement for all individuals seeking substance use treatment regardless of setting. In addition, beginning on the implementation date of the waiver, providers will be required to obtain prior authorization for any SUD residential treatment admission using the ASAM LOC criteria. The FFS delivery system and Plans may also require prior authorization for other levels of care where the initial authorization is exceeded or for intensive levels of outpatient care such as partial hospitalization.

Public input/ timeline concerns

Comment: The state should work with stakeholders to address any concerns regarding the implementation plan as needed. Crucial transparency was not provided to stakeholders. Submission should be delayed until 2/15/19.

   The state will continue to work with stakeholders throughout the implementation of the 1115 waiver. A summary of the Implementation Plan was included in the waiver and posted for public comment. The waiver Implementation Plan is scheduled to be submitted to CMS in mid-December 2018. Following submission, stakeholders will have an opportunity to review it via the CMS web site and submit public comments for consideration. The Department seeks to work with stakeholders to ensure a smooth implementation process and assuring access to SUD treatment services among Ohio’s population in need.
Comment: Per SMD # 18—011 from CMS, the 1115 SMI/SED demonstration waiver opportunity is similar to the SUD 1115 waiver option in that it would allow federal participation in paying for services to individuals with mental health diagnoses who receive short-term services in IMDs, including residential services for children with mental health needs. Waiver submission should be delayed to consider interplay with SMI/SED waiver opportunity.

At this time, the Department is concentrating on submitting the 1115 SUD Waiver in December 2018 and implementing it thereafter. The Department is reviewing the State Medicaid Advisory Letter 18-011 and will determine whether to submit a subsequent waiver application related to SMI/SED services and target population. Thank you for your suggestion.

Bed Reporting/Methodology

Comment: For the waiver application, how is the Department counting beds/ IMD beds, and what is assessment methodology? Will there be a special designation for children and adults?

The approval of Ohio’s 1115-SUD waiver requires the department to count beds for reporting purposes only, and is not required until the baseline performance measures are due after waiver approval. ODM is proposing the use of an independent vendor to conduct site visits and collect the needed information regarding SUD residential facilities. Under this waiver, there is no impact of IMD determination as the purpose of this waiver is to assure continued access and federal reimbursement of healthcare services regardless of service setting. There will not be a special designation for children or adults.

Comment: Nursing facilities should either be excluded from providing IMD services or at least be required to forego existing beds intended for consumers of other long-term care services.

The 1115-waiver does not include nursing facilities.

Benefit Package and Delivery System

Comment: Will there be any change to Medicaid benefit plan for these individuals?

ODM and OhioMHAS are not making any changes to the array of services that comprise the behavioral health benefit package, however, certain changes regarding the delivery of substance use disorder services are required under the federal authority of the waiver.

Comment: Will there be a different impact on Children and Adults?
There will be no differing impact on children and adults. The 1115 waiver will include areas of focus on services to youth as well as an accounting of SUD residential services specific to the treatment needs of youth. An independent vendor will be conducting on-site reviews to better understand capacity and assess need. The independent vendor will assist in identifying any possible provider capacity and access issues.

Comment: Will EPSDT requirements for children continue?

Yes

Comment: Please clarify that both the Managed Care Plans and Fee-For-Service Medicaid payment systems will be participating in the waiver.

Yes, both Managed Care and Fee-For-Service delivery systems will be operating under the 1115 waiver.

Assessment Models

Comment: One appropriate care coordinating model for children with complex mental health and substance use disorder needs is high-fidelity wraparound (HFW). Has this model been considered?

This 1115 SUD waiver does not include a proposal to create High-Fidelity Wrap Around services.

Comment: Has the Family First Prevention Services Act (FFPSA) been considered? Can the FFPSA assessment be used as a starting point to determine how the needs of children in Ohio are not being met?

The Family First Prevention Services Act, Public Law (P.L.) 115-123, enacted February 9, 2018, amends Title IV-E of the Social Security Act to provide foster care maintenance payments for children who are placed with a parent who is receiving services in a licensed residential substance use disorder (SUD) treatment program.

Comment: The START trauma program- Sobriety, Treatment, Reducing Trauma-is a model based on SUD peer recovery services. Has the Department considered the START Program when developing the waiver application?

Thank you for your comment. Peer recovery services are already covered as a service under the Medicaid State Plan.

Licensure and Certification
Comment: Will there be clarification from CMS regarding the current OhioMHAS certification process? Is the current certification sufficient to meet the 1115 waiver requirements for licensure, specific to ASAM LOC3?

Medicaid will implement a process for reviewing residential treatment providers enrolled in the Medicaid program to ensure compliance with ASAM. Providers will be held compliant by onsite and administrative reviews, which will include reviews of records and observations and interviews with staff and clients, as appropriate to the process. The Department will provide more specifics once they are available regarding the CMS required site visits to SUD residential treatment facilities providing Medicaid reimbursed services and enrolled in Medicaid.

Outcomes Measurement

Comment: Under Goal 1, we would like to understand the measurement criteria and outcome data ODM intends to include as access measures. What is the baseline measurement period? Will this evaluation consider the impact of the BH Redesign coding and rate changes implemented 1/1/18 on service access? Will this analysis include access to prevention services? How is health and wellness defined?

Details requested by this comment will be addressed in the monitoring plan and evaluation design provided to the State by CMS at a later date. The Department must follow CMS requirements for all performance measurement and outcome criteria. CMS will not give Ohio the official technical specifications until after waiver approval. In general, CMS performance measures under the 1115-SUD waiver only address SUD services including prevention. This section of the draft waiver has been updated to reflect the latest CMS PMs that are publicly available, including the health and wellness measures CMS is requiring for SUD waivers.

Comment: How does ODM intend to define “recovery outcome”? Is this movement to a lower LOC than SUD residential? Is relapse considered a “treatment failure”? How will the lack of a lower level of care in any community be evaluated?

The Department must follow the CMS requirement for recovery outcomes. Definitions of these and other outcome measures will be detailed at a later date as noted above.

Comment: We do not yet see evidence that Ohio’s policies or treatment capacity have begun to reduce the statewide overdose death rates, and as such find this to be an unrealistic goal that would potentially create unnecessary financial penalties. We caution ODM in moving this goal forward and recommend restating the hypothesis to be “decrease the rate at which overdose deaths have been rising annually in Ohio.”

Thank you for your comment, however, ODM is required to follow CMS milestones and outcome measures. The waiver has been modified to reflect the latest information publicly available from CMS.
Budget Comment: The 5-year budget is based on one quarter of historic data. Does this one quarter of data accommodate all the claims problems and shortfall in spending that has occurred with implementation of BH Redesign?

At the time of developing the 1115 waiver budget neutrality, only one quarter of complete data was available following behavioral health redesign (January 1, 2018 through March 31, 2018). Prior to behavioral health redesign, claims data did not include visibility into SUD residential stays. As a result, the budget neutrality provided was based on one quarter of historical data that included this visibility. We reviewed the available data for reasonableness, and determined it was consistent with time periods prior to the implementation of behavioral health redesign.
Section 1115 Substance Use Disorder Demonstration Implementation Plan

Submitted by the

Ohio Department of Medicaid

Version updated 08/26/2019
Ohio SUD 1115 Demonstration Implementation Plan

Ohio Section 1115 Substance Use Disorder (SUD) Demonstration: Implementation Plan

Nationwide, deaths due to opioids continue to increase, are under-reported and have great variability in the specificity of how they are recorded across the country.\(^1\) Contributing factors to the difficulty of verifying these opioid-related deaths are that a specific drug or cause of death may not be identified or reported, multiple drugs may be listed instead of one, or the primary cause of death may be listed with another diagnosis such as anoxic brain injury or congestive heart failure. From 1999 to 2015, the number of overdose deaths involving opioids in the United States has quadrupled.

Section I – Milestone Completion

After taking office in January 2019, one of Governor Mike DeWine’s first actions was to launch the Recovery Ohio initiative which built on the eight year history of former Governor Kasich’s Governor’s Cabinet Opiate Action Team in continuing to fight all substance use disorders and promote recovery. (See Attachment B on page 53 for a summary of the accomplishments of former Governor Kasich’s Cabinet Opiate Action Team (GCOAT).) Recovery Ohio will assist local schools, law enforcement, businesses, and other agencies who face the consequences of this critical public health concern. Through the Recovery Ohio initiative ODM, other state agencies and state and local partners remain dedicated to improving mental health and substance use prevention, treatment, and recovery support efforts that address the state’s substance abuse crisis.

More detailed information about the Recovery Ohio Initiative as well as its initial action recommendations can be found here: https://governor.ohio.gov/wps/portal/gov/governor/media/executive-orders/2019-08d

Ohio has remained especially vigilant in tracking and fighting opioid use disorders and deaths from opioid overdoses. Opioids deaths in Ohio rose from 1,914 in 2012 to 4,050 in 2016.\(^2\) See Figure 1 for maps outlining the growth in number of unintentional opioid drug-related deaths in Ohio counties between calendar year (CY) 2012 and CY 2017.\(^3\)

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Ruhm, CJ. Geographic Variation in Opioid and Heroin Involved Drug Poisoning Mortality Rates. American Journal of Preventive Medicine, Volume 53, Issue 6, 745 - 753

2 Mortality data can be found at the following website: http://publicapps.odh.ohio.gov/EDW/DataBrowser/Browse/Mortality

3 “Governor’s Cabinet Opiate Action Team Dashboard” (slide 9)
Ohio SUD 1115 Demonstration Implementation Plan

Figure 1: Map of the rate of Unintentional Opioid Deaths per 100,000 people in Ohio Counties

Quintile

- 0 - 3
- 4 - 6
- 7 - 9
- 10 - 21
- >=22

ODM has been particularly assertive in this work as the Centers for Disease Control and Prevention (CDC) reported individuals enrolled in Medicaid were prescribed opioids at more than twice the rate as those with commercial insurance and were at greater risk for opioid abuse and death.4

As of August 2018, Ohio averaged about three million individuals enrolled in Medicaid a month. The number of Medicaid individuals with SUD diagnoses continues to grow. The largest increase in the number of Medicaid individuals with SUD occurred between 2014 and 2015 with the implementation of the Medicaid Expansion. The expansion saw a 23 percent increase in the number of Medicaid individuals with a SUD diagnosis. Following expansion, Ohio Medicaid has continued to see increases in SUD each year, with an 8% increase in 2015-2016 and a 4% increase in 2016-2017. Currently 8% of the total population has a primary SUD diagnosis.

According to Medicaid claims, one tenth (9.8%) of Medicaid individuals enrolled in Group VIII received a primary SUD diagnosis and 7.9% enrolled in Group VIII received

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an opioid use disorder (OUD) primary diagnosis in 2017.\textsuperscript{5} Among those with a primary diagnosis of OUD in 2017, 64.1% received pharmacy-dispensed or office-administered Medication Assisted Treatment (MAT), 85.8% received psychosocial treatment, 95.6% received at least one treatment, and 56.2% received both MAT and psychosocial treatment (Figure 2). This reflects an increase in the utilization of treatment from 2015, during which only 47.5% of individuals with an OUD primary diagnosis received both MAT and psychosocial treatment.

\textbf{Figure 2: Percentage of Medicaid individuals enrolled in Group VIII with a Primary OUD Diagnosis Receiving Treatment, 2015–2017}

![Figure 2: Percentage of Medicaid individuals enrolled in Group VIII with a Primary OUD Diagnosis Receiving Treatment, 2015–2017](image)

Source: Medicaid Administrative Data

Billing codes used to define MAT and psychosocial treatment are in the Methodological Report

The type of SUD diagnosis for the Medicaid population varies widely and includes alcohol, opiates and combinations of those drugs and other drugs. Since 2014, as the number of individuals with SUD diagnoses has increased, the proportion of individuals with any given diagnosis has changed over time. Specifically, individuals in Medicaid with an OUD diagnosis have increased as a proportion of the population. See tables below.

\textsuperscript{5} This finding is based on diagnosed opioid use disorder, which is likely to be an underestimate of the actual prevalence of opioid use disorder.
Tables: The type of SUD diagnosis for the Medicaid population

**2014 Medicaid SUD Diagnoses**

- **AUD** (30%)
- **AUD, OUD** (24%)
- **AUD, SUD** (12%)
- **AUD, OUD, SUD** (4%)
- **OUD** (1%)
- **OUD, SUD** (2%)
- **SUD** (28%)

**2017 Medicaid SUD Diagnoses**

- **AUD** (23%)
- **AUD, OUD** (20%)
- **AUD, SUD** (11%)
- **AUD, OUD, SUD** (3%)
- **OUD** (3%)
- **OUD, SUD** (3%)
- **SUD** (38%)

AUD – Alcohol Use Disorder
OUD – Opioid Use Disorder
SUD – Substance Use Disorder
ODM efforts have primarily focused on the five prongs of the Health and Human Services (HHS) Opioid Strategy (see Figure 3 for a visual of the HHS Opioid strategy) including:

1. Improving access to prevention, treatment and recovery support services.
2. Targeting distribution of overdose-reversing drugs.
3. Advancing the practice of pain management.
4. Supporting cutting-edge research.
5. Strengthening timely public health data and reporting.

A summary of how Ohio already meets each milestone and actions needed is included in the 1115 waiver application.

**Table: Summary of Actions Needed**

<table>
<thead>
<tr>
<th>Summary of Actions Needed</th>
<th>Milestone</th>
<th>Timeline Post Waiver Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td>Milestone 1</td>
<td></td>
</tr>
<tr>
<td>Review plan policies for utilization review and prior authorization for compliance.</td>
<td>Milestone 2</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Review plan delivery for program compliance (e.g., treatment plan, provider qualifications, etc.).</td>
<td>Milestone 2</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Collect, review, and analyze utilization Management information for CY2018.</td>
<td>Milestone 2</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Based upon review and analysis, develop changes to the utilization management approach that reflects analysis and ensure compliance with ASAM and MHPAEA.</td>
<td>Milestone 2</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Develop necessary guidance to plans and providers regarding the new UM process.</td>
<td>Milestone 2</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Update the State requirements to reflect residential requirements for the types of services, hours of clinical care, and credentials of staff for each ASAM residential LOC.</td>
<td>Milestone 3</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Summary of Actions Needed</td>
<td>Milestone</td>
<td>Timeline Post Waiver Approval</td>
</tr>
<tr>
<td>------------------------------------------------------------------------------------------</td>
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<td>-------------------------------</td>
</tr>
<tr>
<td>Require the plans to comply with updated ASAM residential requirements.</td>
<td>Milestone 3</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Implement a standardized State on-site review process of residential provider qualifications against State requirements for ASAM including the types of services, hours of clinical care and credentials of staff for each ASAM residential LOC.</td>
<td>Milestone 3</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Implement a single statewide vendor to survey Ohio SUD residential providers to assure they meet certain standards and manage provider enrollment on an on-going basis.</td>
<td>Milestone 3</td>
<td>24 months</td>
</tr>
<tr>
<td>Require the plans to comply with State processes for credentialing SUD residential providers.</td>
<td>Milestone 3</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Educate abstinence-based residential providers on benefits of MAT accessibility and begin cultural shift toward acceptance of MAT as a complementary treatment.</td>
<td>Milestone 3</td>
<td>24 months</td>
</tr>
<tr>
<td>Require SUD treatment providers to offer access and to facilitate patient access to MAT while in residential settings.</td>
<td>Milestone 3</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Require the FFS delivery system and the plans to monitor access to MAT in residential settings including access to MAT counseling.</td>
<td>Milestone 3</td>
<td>24 months</td>
</tr>
<tr>
<td>Create a comprehensive access assessment baseline of all SUD providers and all SUD LOC including MAT capacity.</td>
<td>Milestone 4</td>
<td>12 months</td>
</tr>
<tr>
<td>ODM will create access standards for SUD LOC.</td>
<td>Milestone 4</td>
<td>12 months</td>
</tr>
<tr>
<td>Require MCPs to update their SUD network development and management plan to specifically focus on SUD provider capacity by LOC, including MAT.</td>
<td>Milestone 4</td>
<td>12-18 months</td>
</tr>
</tbody>
</table>
### Summary of Actions Needed

<table>
<thead>
<tr>
<th>Action</th>
<th>Milestone</th>
<th>Timeline Post Waiver Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Add an indicator for providers accepting new patients to the plan quarterly network adequacy reports.</td>
<td>Milestone 4</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Require the plans to adopt access requirements to all ASAM LOC.</td>
<td>Milestone 4</td>
<td>12 months</td>
</tr>
<tr>
<td>Continue to onboard new electronic health record (EHR) and pharmacy dispensing system vendors.</td>
<td>Milestone 5</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Explore the possibility of analysis to correlate long-term opioid use directly to clinician prescribing patterns in conjunction with the ODM (Action item for the Board of Pharmacy).</td>
<td>Milestone 5</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Implement enhanced information within the Ohio Automated Rx Reporting System (OARRS) including: OARRS flags for individuals who are participating in one of Ohio’s drug court programs; non-fatal overdose deaths, and naltrexone identification to identify individuals treated for SUD.</td>
<td>Milestone 5</td>
<td>Over the duration of the waiver</td>
</tr>
<tr>
<td>Implement an enforcement plan to minimize the risk of inappropriate overprescribing consistent with prescribing guidelines.</td>
<td>Milestone 5</td>
<td>Over the duration of the waiver</td>
</tr>
<tr>
<td>Review data and conduct analysis of individuals with SUD</td>
<td>Milestone 6</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Based upon data analysis develop care coordination model(s) specific to identified populations</td>
<td>Milestone 6</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Implement care coordination for identified populations</td>
<td>Milestone 6</td>
<td>12 to 24 months</td>
</tr>
</tbody>
</table>

### Milestone 1: Access to Critical LOC for OUD and Other SUDs

**CMS Specifications:**
Coverage of: (a) outpatient services, (b) intensive outpatient services, (c) MAT (medications as well as counseling and other services with sufficient provider capacity
to meet the needs of individuals enrolled in Medicaid in the state), (d) intensive LOC in residential and inpatient settings and (e) medically supervised withdrawal management.

**Current and Future State:**
Ohio currently covers all the critical LOC identified in Milestone 1. Ohio administers its Medicaid SUD treatment services based on the ASAM Patient Placement Criteria. No additional actions are needed to meet Milestone 1. The below table identifies the ASAM level-brief descriptions of services currently offered, and associated state plan authorities.

<table>
<thead>
<tr>
<th>Existing ASAM LOC Coverage</th>
<th>Description</th>
<th>Adult/Adolescent Specific Criteria</th>
<th>State Plan Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>ASAM Level 0.5</td>
<td>Early Intervention</td>
<td>Both</td>
<td>State Plan Authority items 13 c and 13 d.</td>
</tr>
<tr>
<td>ASAM Level 1</td>
<td>Outpatient Services</td>
<td>Both</td>
<td>Rehabilitation Authority Item 13-d-2 Page 2 of 9</td>
</tr>
<tr>
<td>ASAM Level 1 Opioid Treatment Services</td>
<td>Opioid Treatment Programs (OTPs)</td>
<td>Both</td>
<td>Rehabilitation Authority Item 13-d-2 Page 2 of 9</td>
</tr>
<tr>
<td>ASAM Level 1 Opioid Treatment Services</td>
<td>Medically Managed Opioid Treatment</td>
<td>Both</td>
<td>Physician Authority Item 5-a</td>
</tr>
<tr>
<td>ASAM Level 2.1</td>
<td>Intensive Outpatient</td>
<td>Both</td>
<td>Rehabilitation Authority Item 13-d-2 Page 2 of 9</td>
</tr>
<tr>
<td>ASAM Level 2.5</td>
<td>Partial Hospitalization</td>
<td>Both</td>
<td>Rehabilitation Authority Item 13-d-2 Page 2 of 9</td>
</tr>
<tr>
<td>ASAM Level 2-WM</td>
<td>Ambulatory Withdrawal Management with Extended Onsite Monitoring</td>
<td>Single set of criteria</td>
<td>Rehabilitation Authority Item 13-d-2 Page 2 of 9</td>
</tr>
<tr>
<td>ASAM Level 3.1</td>
<td>Clinically Managed Low-Intensity Residential Treatment</td>
<td>Single set of criteria</td>
<td>Rehabilitation Authority Item 13-d-2 Page 4 of 9</td>
</tr>
<tr>
<td>ASAM Level 3.2-WM</td>
<td>Clinically Managed Residential</td>
<td>Single set of criteria</td>
<td>Rehabilitation Authority</td>
</tr>
</tbody>
</table>

6 The MCP provider agreement, July 1, 2018, (Appendix G.1.u) requires managed care plans to provide behavioral health services in accordance with state regulations (OAC 5160-27). State regulations (OAC 5160-27-09) requires SUD treatment services to be defined by and provided according to ASAM treatment criteria for addictive, substance related and co-occurring conditions for admission, continued stay, discharge, or referral to each level of care.
<table>
<thead>
<tr>
<th>Existing ASAM LOC Coverage</th>
<th>Description</th>
<th>Adult/Adolescent Specific Criteria</th>
<th>State Plan Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>ASAM Level 3.3</td>
<td>Withdral Management</td>
<td>Single set of criteria</td>
<td>Item 13-d-2 Page 4 of 9</td>
</tr>
<tr>
<td></td>
<td>Clinically Managed Population-Specific High Intensity Residential Treatment</td>
<td>Single set of criteria</td>
<td>Rehabilitation Authority Item 13-d-2 Page 5 of 9</td>
</tr>
<tr>
<td>ASAM Level 3.5</td>
<td>Clinically Managed High Intensity (adults) Residential Treatment and Medium Intensity (adolescents)</td>
<td>Single set of criteria</td>
<td>Rehabilitation Authority Item 13-d-2 Page 5 of 9</td>
</tr>
<tr>
<td>ASAM 3.7</td>
<td>Medically Monitored Intensive Inpatient Treatment (Adults)/ Medically Monitored High Intensity Inpatient Treatment Services (Adolescent)</td>
<td>Both</td>
<td>Rehabilitation Authority Item 13-d-2 Page 5 of 9</td>
</tr>
<tr>
<td>ASAM 3.7-WM</td>
<td>Medically Monitored Inpatient Withdrawal Management.</td>
<td>Single set of criteria</td>
<td>Rehabilitation Authority Item 13-d-2 Page 5 of 9</td>
</tr>
<tr>
<td>ASAM 4 and ASAM-4-WM</td>
<td>Medically Managed Intensive Inpatient Treatment</td>
<td>Single set of criteria</td>
<td>Hospital Authority Item 1</td>
</tr>
</tbody>
</table>

Approximately 90% of all individuals in Ohio Medicaid are enrolled in managed care. MyCare Ohio is Ohio’s dual-eligible demonstration waiver covering individuals in certain counties. Ohio’s plans, both MCOPs and MCPs, currently include all the above LOCs in their contracts. SUD residential LOC in large facilities may be covered under the “in lieu of” authority under managed care rate setting rules.

The Ohio Medicaid covered opioid pharmaceutical therapies are listed below.\(^7\)

Beginning January 1, 2019, the State, in partnership with MCPs, eliminated prior authorization in most instances for MAT for opioid use disorder. All MCPs and FFS will have the same coverage and limitations for these prescribed drugs. Medicare covers prescription drugs for individuals enrolled in MCOPs, so this does not apply to those plans.

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\(^7\)Ohio Medicaid prescription fee schedule and authorization: https://druglookup.ohgov.changehealthcare.com/DrugSearch
The Ohio MAT preferred drug list includes:
- Bunavail® buccal film (buprenorphine/naloxone)
- Buprenorphine SL tablets (generic of Subutex®)
- Buprenorphine/Naloxone SL tablets
- Suboxone® SL film (buprenorphine/naloxone)
- Zubsolv® SL tablets (buprenorphine/naloxone)

The current Medicaid prescription coverage includes:
- Buprenorphine
- Buprenorphine-Naloxone [Suboxone]
- Buprenorphine-Naloxone [Bunavail]
- Buprenorphine-Naloxone [Zubsolv]
- Buprenorphine Implant [Probuphine]
- Sublingual Suboxone
- Naloxone Injectable
- Naloxone Nasal Spray [Narcan]
- Oral Naltrexone Tab
- Naltrexone ER Injectable [Vivitrol]

As part of MAT, individuals prescribed one of the opioid pharmaceutical therapies listed above, and/or are accessing Methadone through OTPs, have access to counseling and other behavioral health (BH) therapies through the ASAM levels covered under the Medicaid State Plan according to the level of counseling that the individual requires.

Beginning January 1, 2020, ODM will implement a unified preferred drug list that will be required of both FFS and the managed care plans.

<table>
<thead>
<tr>
<th>Summary of Actions Needed</th>
<th>Milestone</th>
<th>Timeline Post Waiver Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td>Milestone 1</td>
<td></td>
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</tbody>
</table>

Milestone 2: Use of Evidence-based, SUD-specific Patient Placement Criteria

CMS Specifications:
Implementation of evidence-based, SUD-specific patient placement criteria is identified as a critical milestone that states are to address as part of the demonstration. To meet this milestone, states must ensure that the following criteria are met:

1. 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; and
2. Utilization management (UM) approaches are implemented to ensure that (a) individuals enrolled in Medicaid have access to SUD services at the appropriate LOC, (b) interventions are appropriate for the diagnosis and LOC and (c) there is an independent process for reviewing placement in residential treatment settings.
Implementation of requirement that providers assess treatment needs based on SUD-specific, multi-dimensional assessment tools that reflect evidence-based clinical treatment guidelines

Current State:
The State requires all SUD treatment providers to assess and provide services using ASAM criteria. Ohio Department of Mental Health and Addiction Services (OhioMHAS) requires all certified SUD treatment providers to use multi-dimensional assessments based on the six dimensions of care as outlined in ASAM.

Implementation of a UM approach such that (a) individuals enrolled in Medicaid have access to SUD services at the appropriate LOC

Current State:
Ohio Administrative Code (OAC) 5160-27-09 describes SUD treatment services provided to all individuals in Medicaid. This regulation requires the use of the ASAM treatment criteria for addictive, substance related and co-occurring conditions for admission, continued stay, discharge or referral to each LOC. All plans are required to follow OAC 5160-27-09 in providing BH services under the plan provider agreement. ODM requires FFS providers and plans to provide the current SUD service array using ASAM requirements for assessments, admission and discharge criteria for each SUD outpatient and residential LOC.

The Medicaid Behavioral Health Provider manual, which also applies to plan service decisions, does not describe the responsibilities for screening, assessment and treatment plan review, including the requirements to substantiate appropriate patient placement at each LOC.

Future State:
For each ASAM level, the Medicaid Behavioral Health Provider Manual, managed care provider agreement, and/or OAC will be modified to describe the responsibilities for screening, assessment and treatment plan review, including the requirements to substantiate appropriate patient placement using the ASAM dimensions in assessments, admission and discharge criteria for each SUD outpatient and residential LOC.

<table>
<thead>
<tr>
<th>Summary of Actions Needed</th>
<th>Milestone</th>
<th>Timeline Post Waiver Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Currently meeting</td>
<td>Milestone 2</td>
<td></td>
</tr>
</tbody>
</table>

Implementation of a UM approach such that (b) interventions are appropriate for the diagnosis and LOC

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8 Appendix G.1.u
Current State:

As of July 1, 2019, SUD treatment services provided in the managed care and the FFS delivery systems are required to comply with ASAM criteria for all prior authorization and utilization review decisions resulting in continuity across the Medicaid delivery systems.

Plans are responsible for implementing a UM approach consistent with Milestone #2. The plans perform UM for all LOCs. Services may be subject to outlier review, practice management or other UM strategies. Plans are required to implement “clearly defined structures and processes” on UM programs in accordance with OAC 5160-26-03.1.⁹ OAC 5160-26-03.1 requires a plan’s UM program to ensure care decisions are based on medical necessity. The State requirement also outlines additional standards for the UM program policies and procedures, including the following:¹⁰

- The information sources used to make determinations of medical necessity.
- The criteria, based on sound clinical evidence, to make UM decisions and the specific procedures for appropriately applying the criteria.
- A specification that written UM criteria will be made available to both contracting and non-contracting providers.
- A description of how the plan will monitor the impact of the UM program to detect and correct potential under- and over-utilization.

The UM program must ensure and document the following:

- An annual review and update of the UM program.
- The involvement of a designated senior physician in the UM program.
- The use of appropriate qualified licensed health professionals to assess the clinical information used to support UM decisions.
- The use of board-certified consultants to assist in making medical necessity determinations, as necessary.
- That UM decisions are consistent with clinical practice guidelines as specified in rule 5160-26-05.1 of the Ohio Administrative Code. A plan may not impose conditions around the coverage of a medically necessary Medicaid-covered service unless they are supported by such clinical practice guidelines.
- The reason for each denial of a service, based on sound clinical evidence.
- That compensation by the plan to individuals or entities that conduct UM activities does not offer incentives to deny limit or discontinue medically necessary services to any member.

The State Plan establishes coverage using the ASAM LOC. The State also requires, through OAC 5160-27-09, that SUD treatment services are defined by and provided according to ASAM treatment criteria for addictive, substance related co-occurring conditions for admission, continued stay, discharge or referral to each LOC. Plans are

¹⁰ http://codes.ohio.gov/oac/5160-26-03.1
required to comply with this requirement through the provider agreement, and as such, service authorization criteria must meet this same standard in each plan’s policies and procedures. However, the ASAM criteria for admission, continued stay, discharge or referral to each LOC are not defined in the plan contract or OAC rules with specific instructions to plans. Additionally, the plans are required to take steps to ensure adoption of the clinical practice guidelines by specialized BH care providers, and to measure compliance with the Provider Agreement, OAC and other ODM guidelines. The plans are contractually encouraged to employ substantive provider motivational incentive strategies, such as financial and non-financial incentives, to improve compliance. Additionally, the plans are required to perform record reviews.

Plans are required to have a Behavioral Health (BH) Clinical Director as part of its key staff. The BH Clinical Director, a dedicated part-time staff member, must currently be practicing within the scope of his/her license as either a clinical psychologist or board-certified psychiatrist with a minimum of three years of experience in a clinical setting. Each plan must have at least one board certified psychiatrist who is a prescriber and performs BH Clinical Director functions like monitoring overall safety of patients with a BH diagnosis with a special focus on safe prescribing. The BH Clinical Director duties also include: 11

- BH coverage determination for UM to ensure individuals receive appropriate and medically necessary care in the most cost-effective setting.
- Oversight and quality improvement activities associated with care management activities.
- Providing guidance to BH orientation and network development/ recruitment in conjunction with provider relations, value-based contracting, support of episodes of care and full integration of BH services.
- Assisting in the review of utilization data to identify variances in patterns and providing feedback and education to plan staff and providers as appropriate.
- Representing the plan as the primary clinical liaison to individuals, providers and ODM.

Future State:
The state continually seeks to improve its review and monitoring of its MCOs relative to UM. In keeping with the State’s commitment to improve the use of the ASAM criteria by both providers and plans, ODM will conduct reviews of provider and plan utilization management processes and make necessary adjustments to the UM program as the waiver demonstration evolves.

<table>
<thead>
<tr>
<th>Summary of Actions Needed</th>
<th>Milestone</th>
<th>Timeline Post Waiver Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Review plan policies for utilization review and prior authorization for compliance.</td>
<td>Milestone 2</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Review plan delivery for program compliance (e.g., treatment plan, provider qualifications, etc.).</td>
<td>Milestone 2</td>
<td>12 to 24 months</td>
</tr>
</tbody>
</table>

11 Appendix C.8.d
Implementation of a UM approach such that (c) there is an independent process for reviewing placement in residential treatment settings

Current State:
As of July 1, 2019, plans and FFS were required to utilize ASAM and have an independent process for reviewing all placements in residential treatment settings. Currently the provider agreement requires all plans to follow the prior authorization standards established under BH Redesign for both the FFS and managed care delivery systems. Consistent with 5160-27-09, the FFS delivery system and all MCPs use ASAM for continued stay criteria for residential treatment after 30 days and/or to prior authorize three or more admissions to a residential treatment facility. The provider agreement requires plans to authorize a stay in a SUD residential treatment facility as expeditiously as the member’s health condition requires, but no later than 48 hours after receipt of the prior authorization request. Magellan Clinical Guidelines and InterQual guidelines are utilized by some MCPs in addition to ASAM.

Future State:
The State will maintain the current prior authorization process as described above, and, within 24 months of the approval of the 1115 SUD Waiver Demonstration, will collect, review, and analyze the data regarding residential utilization management from the implementation of the redesign of the behavioral health benefit package on January 1, 2018. Based upon the analysis of the current residential treatment authorization processes, the state will develop appropriate authorization approaches that ensure compliance with ASAM and MHPAEA.

<table>
<thead>
<tr>
<th>Summary of Actions Needed</th>
<th>Milestone</th>
<th>Timeline Post Waiver Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Collect, review, and analyze utilization management information for CY2018.</td>
<td>Milestone 2</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Based upon review and analysis, develop changes to the utilization management approach that reflect analysis and ensure compliance with ASAM and MHPAEA.</td>
<td>Milestone 2</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Develop necessary guidance to plans and providers regarding the new UM process.</td>
<td>Milestone 2</td>
<td>12 to 24 months</td>
</tr>
</tbody>
</table>

Milestone 3: Use of Nationally Recognized SUD-specific Program Standards to Set Provider Qualifications for Residential Treatment Facilities
CMS Specifications:

12 Appendix C.66.c
Implementation of residential treatment provider qualifications (in licensure requirements, provider manuals, managed care contracts or other guidance) that meet the ASAM criteria or other nationally recognized, SUD-specific program standards regarding the types of services, hours of clinical care and credentials of staff for residential treatment settings.

Implementation of a state process for reviewing residential treatment providers to ensure compliance with these standards.

Implementation of a requirement that residential treatment facilities offer MAT on-site or facilitate access off site.

**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, SUD-specific program standards regarding, in particular, the types of services, hours of clinical care and credentials of staff for residential treatment settings**

**Current State:**
OAC 5122-29-09 describes OhioMHAS provider certification requirements. OhioMHAS certification requirements define specific LOCs. These requirements apply to facilities providing residential services under both the managed care and FFS delivery systems.\(^{13}\)

OAC 5122-29-09 requires residential, withdrawal management and inpatient SUD treatment services to be provided in accordance with ASAM Level 3, ASAM Level 3-WM, and associated sub-levels as appropriate to the needs of the individual being served, as published in the ASAM criteria, third edition, 2013. However, the licensing regulations, Ohio Medicaid regulations and the publicly available published Medicaid provider manuals do not detail the service definitions, program requirements, eligibility criteria and detailed provider requirements/qualifications for each level. Providers must purchase the ASAM criteria and interpret the particular types of services, hours of clinical care and credentials of staff for each of the ASAM residential treatment settings and LOC.

**Future State:**
Ohio will strengthen the Medicaid provider qualification requirements, based on ASAM criteria, for SUD residential treatment providers through Medicaid provider manuals, OAC and managed care provider manuals. Ohio will align all service definitions, the Medicaid program requirements, eligibility criteria, and detailed provider requirements/qualifications for each level with ASAM in the published Medicaid provider manual. The Medicaid provider manuals will include more detail about the ASAM residential program standards including the particular types of services, hours of clinical care, and credentials of staff for residential treatment settings.

\(^{13}\) http://codes.ohio.gov/oac/5122-29-09v1
### Summary of Actions Needed

<table>
<thead>
<tr>
<th>Summary of Actions Needed</th>
<th>Milestone</th>
<th>Timeline Post Waiver Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Update the State requirements to reflect residential requirements for the types of services, hours of clinical care and credentials of staff for each ASAM residential LOC.</td>
<td>Milestone 3</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Require the plans to comply with updated ASAM residential requirements.</td>
<td>Milestone 3</td>
<td>12 to 24 months</td>
</tr>
</tbody>
</table>

**Implementation of a state process for reviewing residential treatment providers to ensure compliance with these standards**

**Current State:**
There is currently no standardized state process for the review of residential provider qualifications against state requirements for ASAM Level 3, ASAM Level 3-WM and associated sub-levels. Current standards are not enforced through consistent onsite reviews of residential facilities.

**Future State:**
Medicaid will implement a process for reviewing residential treatment providers to ensure compliance with these standards. Providers will be held compliant by onsite and administrative reviews, which will include reviews of records and observations and interviews with staff and clients, as appropriate to the process. All visits, except for the initial review, will be unannounced. To ensure compliance, reviews will be conducted during application, renewal, complaints, onsite and administrative reviews such as desk reviews.

Residential providers contracting to provide Medicaid services as part of the plan networks will be held to certain standards in their plan contracts and will be required to be credentialed by the plans prior to participating in the network. The plans also will ensure compliance with program standards outlined in the ODM provider manuals by monitoring their provider networks via credentialing, monitoring complaints and during the provider re-credentialing cycle.

In addition, ODM intends to procure a single, statewide vendor to perform SUD treatment provider management including a qualification and verification function to assure statewide standards are met. It is intended that this will achieve a single, reliable provider registry. This new provider enrollment and qualification system is anticipated to be activated during CY2020. Plans will then be limited to credentialing providers from the state’s single source for provider enrollment, allowing ODM to appropriately identify SUD treatment providers in encounter data.
Summary of Actions Needed

<table>
<thead>
<tr>
<th>Milestone</th>
<th>Timeline Post Waiver Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Milestone 3</td>
<td>12 to 24 months</td>
</tr>
</tbody>
</table>

Implement a standardized State on-site review process of residential provider qualifications against State requirements for ASAM including the types of services, hours of clinical care and credentials of staff for each ASAM residential LOC.

Implement a single statewide vendor to survey Ohio SUD residential providers to assure they meet certain standards and manage provider enrollment on an on-going basis.

Require the plans to comply with State processes for credentialing SUD residential providers.

Implementation of requirement that residential treatment facilities offer MAT on-site or facilitate access off-site

Current State:
Finally, there are no requirements for residential providers to arrange for or provide MAT to their residents. Currently, many residential providers utilize abstinence-based care models and do not provide MAT onsite or facilitate offsite access to MAT. However, by the first half of CY 2018, 29% of individuals received MAT during their SUD residential stay.

Because medication in MAT can remain effective for up to 15 days, Ohio also tracks the number of Medicaid individuals who received MAT within 15 days of a residential stay. The number of Medicaid residential stays where the individual was prescribed MAT within 15 days of a residential stay increased to 42% by the first half of CY 2018.
Future State:
The updated Medicaid provider standards will include a requirement that residential treatment facilities offer MAT on-site or facilitate access off-site.

OhioMHAS will modify the OAC section 5122-40-15 governing OTPs to add certified SUD residential/withdrawal management providers to the types of permitted providers under this section.

Over the next 24 months, Ohio will seek to change the culture and attitudes among SUD residential treatment providers to accept and integrate MAT for their residents who choose MAT as a part of their treatment plan. Individuals will continue to have a choice in treatment, but all residential providers will be required to offer MAT on site or facilitate access to MAT off-site. ODM and OhioMHAS will work together to provide outreach and education to abstinence-based programs about the importance of adding MAT as a treatment option.

<table>
<thead>
<tr>
<th>Summary of Actions Needed</th>
<th>Milestone</th>
<th>Timeline Post Waiver Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Educate abstinence-based residential providers on benefits of MAT accessibility and begin cultural shift toward acceptance of MAT as a complementary treatment.</td>
<td>Milestone 3</td>
<td>24 months</td>
</tr>
<tr>
<td>Require SUD treatment providers to offer access and to facilitate patient access to MAT while in residential settings.</td>
<td>Milestone 3</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Require the FFS delivery system and the plans to monitor access to MAT in residential settings including access to MAT counseling.</td>
<td>Milestone 3</td>
<td>12 to 24 months</td>
</tr>
</tbody>
</table>
**Milestone 4: Sufficient Provider Capacity at Critical LOC including for MAT for OUD**

**CMS Specifications:**
- To meet this milestone, states must complete an assessment of the availability of providers enrolled in Medicaid and accepting new patients in the critical LOC listed in Milestone 1. This assessment must determine availability of treatment for individuals enrolled in Medicaid in each of these LOCs, as well as availability of MAT and medically supervised withdrawal management, throughout the state. This assessment should help to identify gaps in availability of services for individuals in the critical LOCs.

*Completion of assessment of the availability of providers enrolled in Medicaid and accepting new patients in the following critical LOC throughout the state (or at least in participating regions of the state) including those that offer MAT: Outpatient Services, Intensive Outpatient Services, MAT (medications as well as counseling and other services), Intensive Care in Residential and Inpatient Settings, Medically Supervised Withdrawal Management.*

**Current State:**
Ohio has 4,135 SUD residential treatment beds in 178 SUD treatment facilities that might meet the definition of an Institute for Mental Disease (IMD). The number of residential days for each residential LOC based on 2014 data can be seen in the Table below:

<table>
<thead>
<tr>
<th>State Fiscal Year 2014</th>
<th>Adult Days</th>
<th>Child Days</th>
<th>Total Estimated Days</th>
</tr>
</thead>
<tbody>
<tr>
<td>ASAM 3.1 (H2034)</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>ASAM 3.2 WM (H0010)</td>
<td>371</td>
<td>35</td>
<td>406</td>
</tr>
<tr>
<td>ASAM 3.3 (H2036 HI)</td>
<td>22,061</td>
<td>0</td>
<td>22,061</td>
</tr>
<tr>
<td>ASAM 3.5 (H2036)</td>
<td>70,759</td>
<td>39,171</td>
<td>109,930</td>
</tr>
<tr>
<td>ASAM 3.7(H2036 TG)</td>
<td>5,404</td>
<td>1,868</td>
<td>7,272</td>
</tr>
<tr>
<td>ASAM 3.7 WM(H0011)</td>
<td>3,947</td>
<td>563</td>
<td>4,510</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>102,542</strong></td>
<td><strong>41,637</strong></td>
<td><strong>144,179</strong></td>
</tr>
</tbody>
</table>

As described in the Milestone #1 section, MCPs are required to contract with a minimum number of certified SUD treatment providers for each designated Ohio MCP region and must maintain provider panel capacity so that enrolled individuals have access to comprehensive SUD treatment services. Ohio monitors compliance with these provider sufficiency requirements through MCP reporting. The network access monitoring reports for SUD treatment providers are still being developed because SUD treatment was first included in the MCP network on July 1, 2018. As noted above, the State will be developing access standards for each ASAM LOC.
When preparing for the inclusion of BH in the MCP benefit package on July 1, 2018, ODM conducted readiness reviews of the MCPs to ensure the panel requirements were met. This included ensuring each MCP had at least a minimum number of comprehensive alcohol and drug treatment providers in each region (see table below). If a covered Medicaid service is not available in network, the MCP must arrange for that service to be provided out-of-network at no additional charge to the member.

The State ensures sufficient coverage by contractually requiring the MCPs to meet network adequacy standards for services. MCPs are required to contract with any willing opioid treatment provider who is appropriately licensed and certified. This includes Methadone providers licensed by OhioMHAS and Buprenorphine-based medications providers certified by Substance Abuse and Mental Health Services Administration (SAMHSA) and/or possessing a Federal DEA waiver. MCPs must also contract with a minimum number of SUD treatment providers determined at the county level (described in table below). MCPs must maintain provider panel capacity so that enrolled individuals have access to the following services with reasonable and timely access:\textsuperscript{14}

- Alcohol/drug screening analysis/lab urinalysis
- Ambulatory detoxification
- Assessment
- Case management
- Crisis intervention
- Individual counseling
- Group counseling
- Induction of buprenorphine
- Injection of naltrexone (for addiction treatment)
- Intensive outpatient (for addiction treatment) and
- Medical somatic services

\textsuperscript{14} MCP provider agreement, July 1, 2018, Appendix H 4.c.ix. Behavioral Healthcare Providers
<table>
<thead>
<tr>
<th>Region</th>
<th>County</th>
<th>SUD</th>
<th>Region</th>
<th>County</th>
<th>SUD</th>
<th>Region</th>
<th>County</th>
<th>SUD</th>
</tr>
</thead>
<tbody>
<tr>
<td>W</td>
<td>ADAMS</td>
<td>-</td>
<td>W</td>
<td>GREENE</td>
<td>1</td>
<td>CEN/SE</td>
<td>NOBLE</td>
<td>1</td>
</tr>
<tr>
<td>W</td>
<td>ALLEN</td>
<td>2</td>
<td>CEN/SE</td>
<td>GUERNSEY</td>
<td>1</td>
<td>W</td>
<td>PAULDING</td>
<td>-</td>
</tr>
<tr>
<td>NE</td>
<td>ASHTABULA</td>
<td>3</td>
<td>W</td>
<td>HAMILTON</td>
<td>15</td>
<td>CEN/SE</td>
<td>PERRY</td>
<td>1</td>
</tr>
<tr>
<td>CEN/SE</td>
<td>ATHENS</td>
<td>2</td>
<td>W</td>
<td>HANCOCK</td>
<td>1</td>
<td>CEN/SE</td>
<td>PICKAWAY</td>
<td>1</td>
</tr>
<tr>
<td>W</td>
<td>AUGLAIZE</td>
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<td>CEN/SE</td>
<td>HARDIN</td>
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<td>CEN/SE</td>
<td>PIKE</td>
<td>1</td>
</tr>
<tr>
<td>CEN/SE</td>
<td>BELMONT</td>
<td>1</td>
<td>W</td>
<td>HENRY</td>
<td>1</td>
<td>NE</td>
<td>PORTAGE</td>
<td>3</td>
</tr>
<tr>
<td>W</td>
<td>BROWN</td>
<td></td>
<td>W</td>
<td>HIGHLAND</td>
<td>1</td>
<td>W</td>
<td>PREBLE</td>
<td>1</td>
</tr>
<tr>
<td>W</td>
<td>BUTLER</td>
<td>4</td>
<td>NE</td>
<td>HURON</td>
<td></td>
<td>W</td>
<td>PUTNAM</td>
<td>1</td>
</tr>
<tr>
<td>W</td>
<td>CHAMPAIGN</td>
<td></td>
<td>NE</td>
<td>RICHLAND</td>
<td>10</td>
<td>NE</td>
<td>RICHLAND</td>
<td>10</td>
</tr>
<tr>
<td>W</td>
<td>CLARK</td>
<td>2</td>
<td>CEN/SE</td>
<td>JEFFERSON</td>
<td>1</td>
<td>CEN/SE</td>
<td>ROSS</td>
<td>3</td>
</tr>
<tr>
<td>W</td>
<td>CLERMONT</td>
<td>2</td>
<td>CEN/SE</td>
<td>JEFFERSON</td>
<td>1</td>
<td>W</td>
<td>SANDUSKY</td>
<td>1</td>
</tr>
<tr>
<td>W</td>
<td>CLINTON</td>
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<td>CEN/SE</td>
<td>KNOX</td>
<td>1</td>
<td>CEN/SE</td>
<td>SCIOTO</td>
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<tr>
<td>NE</td>
<td>COLUMBIANA</td>
<td>1</td>
<td>W</td>
<td>LAKE</td>
<td>5</td>
<td>W</td>
<td>SENECA</td>
<td>-</td>
</tr>
<tr>
<td>CEN/SE</td>
<td>COSHOCTON</td>
<td>1</td>
<td>CEN/SE</td>
<td>LAWRENCE</td>
<td>4</td>
<td>W</td>
<td>SHELBY</td>
<td>1</td>
</tr>
<tr>
<td>CEN/SE</td>
<td>CRAWFORD</td>
<td>1</td>
<td>CEN/SE</td>
<td>LICKING</td>
<td>1</td>
<td>NE</td>
<td>STARK</td>
<td>6</td>
</tr>
<tr>
<td>NE</td>
<td>CUYAHOGA</td>
<td>29</td>
<td>CEN/SE</td>
<td>LOGAN</td>
<td>1</td>
<td>NE</td>
<td>SUMMIT</td>
<td>9</td>
</tr>
<tr>
<td>W</td>
<td>DARKE</td>
<td>1</td>
<td>NE</td>
<td>LORAIN</td>
<td>4</td>
<td>NE</td>
<td>TRUMBULL</td>
<td>1</td>
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<tr>
<td>W</td>
<td>DEFIANCE</td>
<td>1</td>
<td>CEN/SE</td>
<td>LUCAS</td>
<td>11</td>
<td>NE</td>
<td>TUSCARAWAS</td>
<td>1</td>
</tr>
<tr>
<td>CEN/SE</td>
<td>DELAWARE</td>
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<td>CEN/SE</td>
<td>MADISON</td>
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<td>CEN/SE</td>
<td>UNION</td>
<td>-</td>
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<td>NE</td>
<td>ERIE</td>
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<td>CEN/SE</td>
<td>MAHONING</td>
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<td>W</td>
<td>VANWERT</td>
<td>1</td>
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<td>CEN/SE</td>
<td>FAIRFIELD</td>
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<td>CEN/SE</td>
<td>MARION</td>
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<td>W</td>
<td>WARREN</td>
<td>1</td>
</tr>
<tr>
<td>CEN/SE</td>
<td>FAYETTE</td>
<td></td>
<td>NE</td>
<td>MEDINA</td>
<td>3</td>
<td>CEN/SE</td>
<td>WASHINGTON</td>
<td>1</td>
</tr>
<tr>
<td>CEN/SE</td>
<td>FRANKLIN</td>
<td>19</td>
<td>W</td>
<td>MERCER</td>
<td>1</td>
<td>NE</td>
<td>WAYNE</td>
<td>4</td>
</tr>
<tr>
<td>W</td>
<td>FULTON</td>
<td></td>
<td>W</td>
<td>MIAMI</td>
<td>1</td>
<td>W</td>
<td>WILLIAMS</td>
<td>-</td>
</tr>
<tr>
<td>CEN/SE</td>
<td>GALLIA</td>
<td>5</td>
<td>W</td>
<td>MONTGOMERY</td>
<td>10</td>
<td>W</td>
<td>WOOD</td>
<td>1</td>
</tr>
<tr>
<td>NE</td>
<td>GEauga</td>
<td>3</td>
<td>CEN/SE</td>
<td>MORGAN</td>
<td>1</td>
<td>CEN/SE</td>
<td>MUSKINGUM</td>
<td>1</td>
</tr>
</tbody>
</table>

Table: Managed Care Plan Contract Standards for OhioMHAS-certified SUD treatment Providers in Each County

Minimum SUD Provider Agencies for MCPS to Contract by County
The readiness reviews found that the MCPs had differing levels of access compared to the standard. See table below:

**Table: MCP capacity analysis as of September 10, 2018**

<table>
<thead>
<tr>
<th>MCP</th>
<th>Number of Counties Meeting Network Standard for SUD</th>
<th>Percent of Counties* Meeting Network Standard for SUD</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buckeye Health Plan</td>
<td>81</td>
<td>92%</td>
</tr>
<tr>
<td>CareSource</td>
<td>88</td>
<td>100%</td>
</tr>
<tr>
<td>Molina</td>
<td>88</td>
<td>100%</td>
</tr>
<tr>
<td>Paramount</td>
<td>86</td>
<td>98%</td>
</tr>
<tr>
<td>United Healthcare</td>
<td>88</td>
<td>100%</td>
</tr>
</tbody>
</table>

*Percent of 88 counties

The MCPs are tasked with monitoring provider capacity of their networks. Each MCP develops and maintains a provider Network Development and Management Plan, which ensures the provision of core benefits, and services will occur. It includes the MCP’s process to develop, maintain and monitor an appropriate provider network that is supported by written agreements and is sufficient to provide adequate access of all required services. The plan demonstrates access to BH services, identifies gaps in network and describes the process to ensure services are delivered. The plan provides geo-mapping of providers to geographically demonstrate network capacity. The plan has policies detailing how it will provide or arrange for medically necessary covered services should the network become temporarily insufficient and will monitor the adequacy, accessibility and availability of its provider network to meet the needs of enrolled individuals. MCP Network Development and Management Plans are updated at least annually or more often as needed to reflect material changes in network status.

The MyCare Ohio contracts (both the Provider Agreement and the three-way contract) do not define specific SUD network requirements like those described above. However, MCOPs are held to the same standard of “assuring access to all-Medicaid covered BH services.” The MCOPs are also required to demonstrate an adequate provider network “sufficient in number, mix, and geographic distribution” to ensure access to BH services. MCOPs as described in the Provider Agreement are required to evaluate each region’s network capacity of BH services using the minimum capacity standards located in the table below:

**Table: MyCare Ohio Contract Standards for OhioMHAS-certified SUD treatment Providers in each region**

<table>
<thead>
<tr>
<th>Region</th>
<th>OMHAS SUD Provider Agencies</th>
</tr>
</thead>
<tbody>
<tr>
<td>Central</td>
<td>8</td>
</tr>
<tr>
<td>East Central</td>
<td>8</td>
</tr>
<tr>
<td>Northeast</td>
<td>8</td>
</tr>
<tr>
<td>Northeast Central</td>
<td>6</td>
</tr>
</tbody>
</table>

15 Section 2.7.10 of the three-way contract
16 Section 2.6.1.1 of the three-way contract
The number of individuals receiving SUD treatment continues to grow. Ohio has tracked the increased capacity in the system through the increased number of individuals in treatment and the improved treatment rates of this population (i.e., increase SUD services penetration rate). See table below:

<table>
<thead>
<tr>
<th>Year</th>
<th>Any Primary SUD Diagnosis</th>
<th>Any SUD Diagnosis</th>
<th>General SUD Treatment</th>
<th>Appropriate MAT Usage</th>
<th>Population with any SUD diagnoses receiving SUD services (Penetration Rate)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>103,144</td>
<td>183,598</td>
<td>107,300</td>
<td>27,559</td>
<td>58%</td>
</tr>
<tr>
<td>2015</td>
<td>129,767</td>
<td>225,684</td>
<td>134,075</td>
<td>37,653</td>
<td>59%</td>
</tr>
<tr>
<td>2016</td>
<td>147,519</td>
<td>244,384</td>
<td>151,572</td>
<td>48,531</td>
<td>62%</td>
</tr>
<tr>
<td>2017</td>
<td>161,034</td>
<td>254,925</td>
<td>165,642</td>
<td>56,982</td>
<td>65%</td>
</tr>
</tbody>
</table>

The State also monitors MAT providers. The State trends the number of providers with Drug Enforcement Agency (DEA) waivers as well as the capacity of those providers. Monitoring also includes the number of providers prescribing Vivitrol. See figures below:

Data Source: Ohio Department of Mental Health & Addiction
Per the current MCP contract, MCPs are allowed to provide mental health services to members ages 21 through 64 for up to 15 days per calendar month while receiving inpatient treatment in designated IMDs. Medicaid does not compensate the MCP for the provision of such services beyond 15 days per calendar month either through direct payment or considering any associated costs in Medicaid rate setting. The MCPs are required to report quarterly on stays in designated IMDs that exceed 15 days per calendar month per ODM’s specifications. Future MCP contracts will outline requirements for provision of services to individuals with SUD receiving services in residential settings or facilities as described in the Summary of Actions outlined in Milestones 2, 3, and 4.

**Future State:**
Ohio will create an assessment of the availability of SUD treatment providers enrolled in Medicaid that are accepting new patients in the critical LOCs\(^1\) throughout the state including those that offer MAT. The State expects to be able to develop the assessment within 12 months of demonstration approval. This assessment will include:

- Whether facilities accept clients funded through the managed care, FFS or both delivery systems.

\(^1\) ASAM 1: Outpatient Services; ASAM 2.1/2.5: Intensive Outpatient Services/Partial Hospitalization; ASAM 1-WM/2-WM: Medication Assisted Treatment (medications as well as counseling and other services); ASAM 3.1/3.3/3.5/3.7/4: Intensive Care in Residential and Inpatient Settings; ASAM 3.2-WM/3.7-WM: Medically Supervised Withdrawal Management
• Anticipated penetration rate and geographic distributions of providers at each LOC.
• Plans for enhancement of capacity based on assessments of provider availability.

ODM will establish updated access standards for the new array of BH State Plan services including all SUD ASAM LOC. MCPs will be required to meet the new access standards and to report on their SUD treatment provider network development and management plans, specifically focusing on SUD treatment provider capacity, including MAT. Geo-mapping will also be expanded to monitor access to MAT inclusive of a reporting mechanism to monitor the number and location of providers accepting new patients.

MCPs will submit network adequacy reports to ODM on a quarterly basis inclusive of counts of available network providers by LOC and by provider type. The quarterly network report package will include GeoAccess mapping for all SUD network providers by ASAM LOC capacity. Should gaps in access or adequacy be identified, the MCPs are required to submit gap analyses and ad hoc network development plans with their quarterly report package.

The MCOP contract currently specifies that each MCP must have 6–8 SUD providers in each region’s network. Future plan contracts will outline geographic access requirements for maximum travel time and/or distance requirements for each ASAM LOC.

As an additional treatment strategy, physicians, advanced practice registered nurses and physician assistants will be encouraged to become certified dispensers. According to the Drug Addiction Treatment Act of 2000 (DATA 2000), which expands the clinical context of medication-assisted treatment for persons with OUD, certified practitioners (including MDs, DOs, Advanced Practice Nurses and Physician Assistants) are permitted to dispense or prescribe specifically approved Schedule III, IV and V narcotic medications such as buprenorphine, Suboxone, and Subutex in settings other than an OTP. DATA 2000 reduces the regulatory burden on physicians who choose to practice OUD treatment by permitting qualified physicians to apply for and receive waivers of the special registration requirements defined in the Controlled Substances Act.

<table>
<thead>
<tr>
<th>Summary of Actions Needed</th>
<th>Milestone</th>
<th>Timeline Post Waiver Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Create a comprehensive access assessment baseline of all SUD providers and all SUD LOC, including MAT capacity.</td>
<td>Milestone 4</td>
<td>12 months</td>
</tr>
<tr>
<td>ODM will create access standards for SUD LOC.</td>
<td>Milestone 4</td>
<td>12 months</td>
</tr>
<tr>
<td>Require MCPs to update their SUD network development and management plan to specifically focus on SUD provider capacity by LOC, including MAT.</td>
<td>Milestone 4</td>
<td>12 to 18 months</td>
</tr>
</tbody>
</table>
Add an indicator for providers accepting new patients to the plan quarterly network adequacy reports. | Milestone 4 | 12 to 24 months

Require the plans to adopt access requirements for all ASAM LOC. | Milestone 4 | 12 months

**Milestone 5: Implementation of Comprehensive Treatment and Prevention Strategies to Address Opioid Abuse and OUD**

**CMS Specifications:**
- Implementation of opioid prescribing guidelines, along with other interventions to prevent opioid abuse.
- Expanded coverage and access to, naloxone for overdose reversal.
- Implementation of strategies to increase utilization and improve functionality of prescription drug monitoring programs (PDMPs).

*Implementation of opioid prescribing guidelines, along with other interventions to prevent opioid abuse*

**Current and Future State:**

**Opioid Prescribing Guidelines**

Since 2012, Ohio has implemented five sets of opiate prescribing guidelines as part of GCOAT. This multi-pronged approach has advanced Ohio’s fight against the opioid epidemic. (See Attachment B) Changes in prescribing guidelines addressed the easiest sources of uncoordinated prescription medications including prescriptions obtained via hospital emergency departments. The State also included guidelines for patients already taking opioid medications and safeguards for the highest doses of prescription opioids. The updated guidelines include:

- The first Emergency and Acute Care Facility Opioid and Other Controlled Substances Prescribing Guideline was released in April 2012 for hospital emergency departments and acute care facilities to address the large proportion of opioids prescribed from these settings, disconnected from routine sources of care for chronic pain conditions.
- In October 2013, GCOAT introduced Opioids Prescribing Guidelines for Treatment of Chronic, Non-terminal Pain for Ohio’s opiate prescribers as the risk for overdose became increasingly apparent across the country.
- In January 2016, GCOAT launches Guidelines for the Management of Acute Pain Outside of Emergency Departments and acute care facilities. These guidelines addressed “new starts” and to further encourage non-opioid therapies and pain medications for the management of acute pain expected to resolve within 12 weeks.
- In August 2017, Ohio implemented prescribing limits for acute pain (seven days for adults and five days for minors). In order to be able to monitor adherence to these requirements, in December 29, 2017 prescribers were required to include
the first four alphanumeric characters of the diagnosis code or full procedure code on opioid prescriptions. The inclusion of a diagnosis/procedure code (CDT) was required for all other controlled substance prescriptions on June 1, 2018. The final requirement was a days’ supply limit on all controlled substance and gabapentin prescriptions.

- A final unifying guideline was rolled out in 2018, emphasizing the need for vigilance and persistence in ensuring safety and screening for misuse and abuse. Documentation recommendations were delineated, with a “press pause” at the lower threshold of 50 Morphine Equivalency Dosage (MED) instead of the 80 MED described in prior chronic pain guidelines.

### Progressive Opioid Prescribing Guidelines for a Safer Ohio

<table>
<thead>
<tr>
<th></th>
<th>Emergency Department &amp; Acute Care Facilities</th>
<th>For Chronic, Non-Terminal Pain</th>
<th>For Acute Pain Outside of Emergency Department</th>
<th>Prescribing Limits For Acute Pain</th>
<th>For Subacute Pain</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Effective Date</strong></td>
<td>April 2012</td>
<td>October 2013</td>
<td>January 2016</td>
<td>August 2017</td>
<td>October 2018</td>
</tr>
<tr>
<td><strong>Specific Goals</strong></td>
<td>Stop inappropriate prescribing from ED &amp; Urgent Care Centers</td>
<td>Ensure long-term patient safety</td>
<td>Limit first use of opioids and decrease availability of unused opioid medications</td>
<td>Limit type &amp; amount of opioids for acute pain</td>
<td>Establish a continuum of safe prescribing with express informed consent</td>
</tr>
</tbody>
</table>
| **Prescribing Limitations** | - No more than 3 day supply for chronic conditions  
- No recurrent refills for chronic conditions  
- No long-acting opioids  
- Connect to usual source of chronic care | - At ≥ 80 mg MED “press pause”  
- Caution with co-prescribing of benzodiazepines  
- Mandatory written agreement  
- Prescribe Naloxone  
- Mandatory OARIS checks and monitoring | - Discuss pain management expectations  
- First consider non-pharmacologic and non-opioid therapies  
- Limit pills per script  
- No Long-acting opioids  
- 2 week check point | - 7 day supply for adults  
- 5 day supply for youth  
- 30 MED average | - At ≥ 50 MED, “press pause”  
- Informed consent  
- Screen for OUD  
- At ≥80 MED, subspecialty consultation  
- At ≥120MED, pain medicine specialist |

MCPs implemented state-standardized claim edits requiring prior authorization for short-acting opioid prescriptions as well as prior authorization for all long-acting opioids. These claim edits were designed to help “enforce” the board’s guidelines.

### Other Statewide Interventions

Additional interventions included:

2. Eliminated the authority of physicians to telephone in prescriptions for Schedule II drugs such as hydrocodone (Vicodin®).
3. Reduced the number of patients starting their first opioid.
4. Required Medicaid MCPs put edits in place within their pharmacy programs to support prescribing guidelines.
5. Required MCPs to implement Medication Therapy Management (MTM) for those with problematic polypharmacy and a Coordinated Services Program (CSP) to provide care management services for members who overuse or misuse services (described in greater detail below).

7. Created a youth drug prevention program called, Start Talking, which was launched in January 2014.

8. Required MCPs to implement a CSP as described in OAC rule 5160-20-01. Currently the Medicaid MCPs have approximately 3,400 members in the CSP. The OAC rule establishing CSP has been amended to specify additional lock-in criteria effective January 1, 2019. The changes are expected to increase the number of individuals enrolled in CSP.

Over the course of these guidelines and rules, the State of Ohio was able to realize a 28% reduction in solid doses of opioids prescribed from 196 million doses per quarter in Q2 2013 to 136 million Q2 2017.\(^\text{18}\) For acute pain, prescriptions fell from 70 million per quarter to 51 million over that same time frame with a reduction in number of patients with any opioid falling from 1.29 million per quarter to 948,000 per quarter.

These initiatives have resulted in direct impacts on Medicaid prescribing. The Medicaid opioid claims have reached a low point of 116,348 claims in December 2017.

**Figure: Medicaid Opioid – Total Claims**

Ohio is one of the first states to realize a reduction in opioid deaths related to prescription drugs amid escalating overall deaths driven by illicit drug use. Of all unintentional drug overdose deaths, the percentage of prescription opioid-related deaths in Ohio declined for a fifth straight year in 2016 and the number of these deaths declined 15.4% from 667 in 2015 to 564 in 2016 — the fewest since 2009.\(^\text{19}\) See figure below.

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\(^{18}\) OARRS data, Ohio's Opioid Epidemic, The Medicaid Experience & Progress to Date, Agency Briefing on Opioids October 2017 SPA-5, Mary Applegate, MD, FAAP, FACP, Slide 33.

\(^{19}\) Mortality data can be found at the following website: http://publicapps.odh.ohio.gov/EDW/DataBrowser/Browse/Mortality
Medicaid Managed Care Interventions
To implement these prescribing guidelines in the Medicaid program, the Ohio Association of Health Plans convened a series of meetings to develop a comprehensive plan to address the opioid epidemic in Ohio. The most well received suggestion (or action strategy, etc.) was the high Morphine Equivalent Dosing (MED) intervention shared by one of the MCPs. MED determines a patient’s cumulative intake of any drugs in an opioid class in a 24-hour period. This involved identification of members receiving ultra-high MEDs and approaching the prescriber. The intervention included escalating letters and phone calls to the provider insisting on evidence-based practice and weaning when appropriate. There were provider consequences for non-compliance. The program has had well-documented success with a significant impact on total number of opioids prescribed.

In 2016, ODM challenged the MCP pharmacy directors to consider options specific to inappropriate opioid prescribing, aligning with internal plan efforts on the provider side of their programs. ODM FFS and the MCPs limited the number of opioid claims paid in a rolling 30 days to five, so that the sixth claim would reject for prior authorization. Both programs also tightened the allowable “early refill provisions, setting thresholds at 90%, which equated to no refills being allowed before day 27 in a 30-day month, for example.
As the MCPs agreed on these sorts of standards, there were operational considerations at the Pharmacy Benefit Manager (PBM) levels in terms of implementation. PBMs could allow the claim to pay but send a message to the pharmacy. They could deny the claim but allow the pharmacist to override after reviewing the message (and, one would hope, the patient’s history and the PDMP, and maybe call one or more prescribers). Alternatively, they could deny the claim and require prior authorization. The MCP PBMs did not achieve standardization to this degree of operational detail, but they were aligned. The PBMs for all of the MCPs and FFS utilized many other options to contain unsafe prescribing practices including using a preferred drug list, point of sale edits, step therapy, prior authorization, dispensing limits, age restrictions, prospective drug utilization review (DUR) edits like early refills, therapeutic drug duplication and drug interactions.

In 2012, ODM began coverage for MAT. While preferred MAT drugs varied by plan, as attention shifted to special populations such as the incarcerated who chose court-ordered treatment in lieu of incarceration, all of the MCPs worked together to remove barriers. As Vivitrol was the form of MAT preferred most by the judicial system, all MCPs removed prior authorization for Vivitrol, as did FFS, simplifying yet another aspect of the pharmacy program.

Ohio’s BH benefit was integrated into managed care July 1, 2018, prompting significant efforts to further remove administrative barriers to MAT utilization, ensuring the provision of MAT for individuals as well as concomitant psychosocial care. After considering the option of “gold-carding” providers, the MCPs agreed to remove all prior authorization requirements for all oral forms of short-acting buprenorphine and build a robust standardized retrospective DUR program on the back end. Some edits related to very young ages or pregnancy status may apply as the MCPs are still held to standards of patient safety. Long-acting or injectable forms of MAT (other than Vivitrol) are still subject to documentation requirements.

The MCPs also made sequential changes as the landscape of prescribing guidelines and limits evolved. In October 2017, FFS and all MCPs agreed to require prior authorization for all long-acting opioids prescribed for acute pain, supporting the state guidelines. In July 2018, all MCPs and FFS agreed to place a limit on days’ supply and MED for short-acting opioids in new start patients, again stepping up to support evolving state prescribing limits by January 2018.

In 2017, alternative pain management strategies were evaluated to ensure that ODM was fully supporting strategies to minimize inappropriate prescribing of opioids. As FFS began to cover acupuncture for headache and low back pain, initially by physicians, extending to chiropractors and acupuncturists, the MCPs followed suit.

The MCPs have been active participants in many programs targeting special populations challenged with OUD consequences. The recently incarcerated were already mentioned. A Pre-Release program was developed allowing inmates to choose a Medicaid MCP in the 90 days before release, allowing for a video case conference and connectivity to needed community health services such as continuation of OUD treatment. Pregnant women are particularly affected by OUD as their infants may be
born with Neonatal Abstinence Syndrome, associated with long Neonatal Intensive Care Unit stays and child protective services (CPS) involvement. ODM has partnered with the Ohio Perinatal Quality Collaborative to develop models of care such as those described in the Maternal Opiate Medical Support program, in which the MCPs participate actively. Addressing associated social determinants of health has been particularly challenging as these are prominent issues for those with OUD, but Ohio continues to advance the field of ideal care with the support of our MCPs.

<table>
<thead>
<tr>
<th>Summary of Actions Needed</th>
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<tbody>
<tr>
<td>None</td>
<td>Milestone 5</td>
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**Expanded Coverage of, and Access to, Naloxone for Overdose Reversal**

**Current and Future State:**
Ohio has taken steps to prevent drug overdose deaths through the expanded availability and use of the opiate overdose reversal drug Naloxone. One of the most effective steps for expanding coverage included permitting pharmacists to dispense Naloxone without a prescription in 2015. To assist pharmacies, the State of Ohio Board of Pharmacy developed a dedicated web page, [www.pharmacy.ohio.gov/naloxone](http://www.pharmacy.ohio.gov/naloxone), which features helpful resources including a guidance document, sample protocol, and a listing of all participating pharmacies. The Pharmacy Board also offers printed, no-cost patient educational materials to any participating pharmacy. By 2017, more than 1,600 Ohio pharmacies in 87 counties offer naloxone without a prescription.

Other steps taken by the state to expand access to Naloxone include:

- Created and implemented a naloxone education and distribution program called Project DAWN (Deaths Avoided with Naloxone).
- Established an online training course for law enforcement and an educational video for the public regarding the administration of naloxone.
- Negotiated rebates with naloxone manufacturer Amphastar Pharmaceuticals, Inc., regarding rebates for public entities that purchase Amphastar naloxone.
- Funded local health department distribution to purchase naloxone for law enforcement.
- Passed a law in 2016 with a “good Samaritan” provision that provides immunity from prosecution to those who seek emergency help for the victim of an overdose.
- Issued guidance to hospitals on providing naloxone to patients upon discharge and to Emergency Medical Service organizations on providing naloxone to individuals treated for an opiate overdose.
- Passed a 2017 law allowing facilities that interact with high-risk individuals to have on-site access to naloxone including homeless shelters, halfway houses, schools and treatment centers.
**Summary of Actions Needed**

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<thead>
<tr>
<th>Milestone</th>
<th>Timeline Post Waiver Approval</th>
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<tbody>
<tr>
<td>None</td>
<td>Milestone 5</td>
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**Increasing Utilization and Improving Functionality of Prescription Drug Monitoring Programs**

**Current State:**
Ohio first mandated use of the OARRS, the State’s PDMP by prescribers in 2011, with additional provisions added in 2013. OARRS is a tool to track the dispensing and personal furnishing of controlled prescription drugs to patients. OARRS is designed to monitor this information for suspected abuse or diversion (i.e., channeling drugs into illegal use), and can give a prescriber or pharmacist critical information regarding a patient’s controlled substance prescription history. This information can help prescribers and pharmacists identify high-risk patients who would benefit from early interventions.

Since the latest mandate in 2013, the use of the OARRS has grown. In 2017, the OARRS reported a record high of 265,242 requests by prescribers and pharmacists in a single day. By comparison, the single day high in 2016 was 86,129 prescriber and pharmacist requests. In August 2018, OARRS reported an average of more than 599,000 requests per weekday — more than double the previous year’s high. Notably, OARRS integration with EHRs statewide includes the following as of August 31, 2018:

- Nineteen major health systems and outpatient clinics, such as: Promedica, Mount Carmel, Mercy Health, MetroHealth, The Ohio State University Wexner Medical Center, Cleveland Clinic, Avita Health, Southwest General, University Hospital (Cleveland), Aultman, Adena, Genesis Healthcare, Kettering Health Network, Premier Health, Magruder Health, Nationwide Children’s, Christ Hospital Health, Toledo Clinic Health and Licking Memorial.
- Two hundred and six independent Ohio pharmacies.
- Nine chain pharmacies, including: Discount Drug Mart (seventy-three stores), Kroger (two hundred and one stores), Giant Eagle (five stores), Costco (fourteen stores), Fruth (eleven stores), Ritzman (twenty-five stores), Acme (seventeen stores), Meijer (forty-one stores) and Walmart (174 stores).
- One hundred and forty-four physician offices.
- Fourteen hospitals.
For an overall picture of the percentage of prescribers and pharmacies integrated with OARRS, see the figure below.

Figure: Percent of Prescribers and Pharmacies integrated with OARRS

OARRS has also documented that fewer Ohioans are using multiple prescribers or pharmacies (i.e., doctor shopping). In 2017, data from OARRS found the number of individuals using more than five prescribers for prescription opiates has decreased 88% since 2011. Similarly, the number of Medicaid members with four or more pharmacies has continuously dropped since January 2017 (see figure).

Figure: Medicaid Member with four or more Pharmacies

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The State of Ohio has leveraged opportunities described in Severely Mentally Disabled Letter 16-003 to help professionals and hospitals eligible for Medicaid EHR Incentive Payments connect to other Medicaid providers through the integration of OARRS into electronic medical records and pharmacy dispensing systems. All hospitals and pharmacies now have ability to have OARRS integrated into their EHRs and Pharmacy management systems. Nearly half of physicians now have integrated access to OARRS.\textsuperscript{21} This initiative allows the State to meet the following objectives:

- Further reduce the number of individuals who doctor shop.
- Provide health care providers critical information regarding a patient’s controlled substance prescription history and expand collection of other data sources to support clinical decision-making.
- Support clinician interventions for patients exhibiting high-risk behaviors.
- Assist providers in achieving the medication reconciliation meaningful use objective and measure.\textsuperscript{22}
- An additional goal of this integration initiative is to provide as many avenues as possible for an authorized health care provider to access Ohio’s PDMP, including integrated access through Health Information Exchanges (HIEs). In fact, Ohio’s two largest HIEs — CliniSync and The Health Collaborative (HealthBridge) — have already been integrated with OARRS under this initiative. As both of the state’s HIEs are integrated, there are no future plans for enhanced connectivity at this time.

**Prescription Drug Monitoring Program Functionalities**

Ohio’s Board of Pharmacy and OARRs system participate in the PMP Interconnect. The system allows a user to search PDMPs in 20 other states, including all of Ohio’s Border States. Ohio will continue to grant access to PDMP users from other states via the Project Manager Professional (PMP) Interconnect platform. This will depend on each State’s ability to share data.

Ohio is the first state in the country to pay all costs for the integration of PDMP data into EHRs and pharmacy dispensing systems. This allows for instant access to PDMP data as part of the healthcare providers workflow. County-based integration statistics are included as an attachment to this document.

Currently, there are no activities within OARRS to correlate long-term opioid use directly to clinician prescribing patterns.


\textsuperscript{22} Stage 3 of Meaningful use consolidates Medication reconciliation into the Health Information Exchange Objective. The objective requires that the Eligible Professional provides a summary of the care record when transitioning or referring their patient to another setting of care, receives or retrieves a summary of care record upon the receipt of a transition or referral or upon the first patient encounter with a new patient, and incorporates summary of care information from other providers into their EHR using the functions of CEHRT. Providers must attest to all three measures and must meet the threshold for at least two measures to meet the objective.
Ohio has adopted Appriss Health’s NarxCare program as its PDMP platform. NarxCare is a comprehensive platform that aggregates and analyzes prescription information from providers and pharmacies and presents visual, interactive information, as well as advanced analytic insights, complex risk scores and more to help physicians, pharmacists and care teams to provide better patient care and safety. Furthermore, NarxCare provides tools and resources that support patients’ needs and connects them to treatment, if necessary. This information, insight and functionality is all accessed in clinical workflow via EHRs and pharmacy management systems, as well as through the PDMP website.

Ohio recently transitioned from the original AWARxE patient matching algorithm, to Axis, Appriss’ new master patient index. Axis uses not only PDMP data, but also a number of external data sources (USPS change of address, credit headers, etc.) to inform the system as to which similar entries may be the same patient, versus which are actually two different individuals.

Unlike the previous generation of patient matching software, Axis is capable of improving its matching capabilities over time. As Board of Pharmacy staff identify instances where the matching was incorrect, Axis is able to use that information to make better matching decisions in the future.

Ohio recently implemented rules limiting the provision of initial prescriptions of opioids to treat acute pain. With limited exceptions, a prescriber is not permitted to prescribe more than a five-day supply for a minor or a seven-day supply for an adult. Additionally, the prescriptions cannot exceed 30 morphine equivalent daily dose. The rules went into effect in August 2017. The Board of Pharmacy is currently developing an enforcement plan with the State Medical Board, Nursing Board and Dental Board. In order to account of the exemptions, Ohio regulations require the inclusion of a diagnosis code on all prescriptions for controlled substances.

**Future State:**
The Board of Pharmacy will continue to onboard new EHR and pharmacy dispensing system vendors with the goal of achieving a 90% integration rate of all providers (prescribers and pharmacies). Contacting vendors and coordinating the completion of legal agreements and testing is the responsibility of OARRS Integration Project Manager in collaboration with the PDMP vendor, Appriss Health.

The Board of Pharmacy will explore the possibility of analysis to correlate long-term opioid use directly to clinician prescribing patterns in conjunction with the ODM.

NarxCare allows the Board to collect additional non-PDMP based data for inclusion in the PDMP report. The first non-PDMP data to be included will be flags in the system for those who are participating in one of Ohio’s drug court programs. There are plans to include other data sources such as death after a non-fatal overdose. The Board is also working on the inclusion of naltrexone to be reported to the PDMP to identify individuals who have been treated for substance use disorder. The PDMP Administrator along with the PDMP Vendor, Appriss Health, are responsible for the development of processes
and system testing for the inclusion of additional patient data. The Ohio Supreme Court is working to compile regular data sets of drug court participants.

The Board of Pharmacy will implement an enforcement plan to minimize the risk of inappropriate overprescribing consistent with prescribing guidelines. The PDMP Administrator will be responsible for the development of a referral report to the appropriate prescriber regulatory boards. Ohio’s prescriber regulatory boards will implement education and enforcement actions against prescribers who are in violation of the rules.

### Summary of Actions Needed

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<tr>
<th>Summary of Actions Needed</th>
<th>Milestone</th>
<th>Timeline Post Waiver Approval</th>
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<tbody>
<tr>
<td>Continue to onboard new EHR and pharmacy dispensing system vendors.</td>
<td>Milestone 5</td>
<td>Over the course of the waiver</td>
</tr>
<tr>
<td>Explore the possibility of analysis to correlate long-term opioid use directly to clinician prescribing patterns in conjunction with the ODM (action item for the Board of Pharmacy).</td>
<td>Milestone 5</td>
<td>Over the course of the waiver</td>
</tr>
<tr>
<td>Implement enhanced information in the OARRS including: OARRS flags for individuals who are participating in one of Ohio’s drug court programs; non-fatal overdose deaths, and naltrexone identification to identify individuals treated for SUD.</td>
<td>Milestone 5</td>
<td>Over the course of the waiver</td>
</tr>
<tr>
<td>Implement an enforcement plan to minimize the risk of inappropriate overprescribing consistent with prescribing guidelines.</td>
<td>Milestone 5</td>
<td>Over the course of the waiver</td>
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### Milestone 6: Improved Care Coordination and Transitions between LOCs

**CMS Specifications:**
- Implementation of policies to ensure residential and inpatient facilities link individuals, especially those with OUD, with community-based services and supports following stays in these facilities.
- Additional policies to ensure coordination of care for co-occurring physical and mental health conditions.

**Current State:**
ODM approaches care coordination by promoting a population health management approach as well as other reforms to create an improved system to better care for all individuals in Medicaid including those with SUD diagnoses. Specifically, ODM identifies and monitors individual patients in high risk categories, such as individuals with a BH diagnosis. Data are used to risk stratify and group individuals into population streams, one of which is BH. Strategies specific to risk levels and population streams are then
developed by ODM and contracted managed care plan partners to improve patient outcomes and quality of care. Value-based purchasing strategies further enhance the promotion of evidence-based and comprehensive care for patients with SUD.

Ohio has undertaken multiple interventions and strategies to improve coordination of care and the transition between LOCs along the continuum of care including, but not limited to, facility discharge requirements in OhioMHAS certification standards, Ohio’s Comprehensive Primary Care (CPC) program, care management and transition of care requirements in MCP contracts, and targeted case management.

**Facility discharge requirements in OhioMHAS certification standards**
OhioMHAS certification requirements at OAC 5122-29-09 require that each residential, inpatient and withdrawal management provider have an affiliation agreement with at least one provider for referral to less intensive LOC. Each provider is also required to have written policies and procedures to ensure its referral process is appropriately implemented and managed and includes:

- Referral decisions made to the appropriate LOC as determined utilizing the American Society of Addiction Medicine criteria protocols for LOC.
- Discharge plan stipulating specific recommendations and referrals for alcohol and drug addiction treatment.
- Documentation of referral and discharge must appear in the client record.

**Comprehensive Primary Care Program**
CPC is a patient-centered medical home program, which is a team-based care delivery model led by a primary care practice (PCP) that comprehensively manages a patient’s health needs. The goal is to empower practices to deliver the best care possible to their patients, both improving quality of care and lowering costs. There is an expectation that all Medicaid individuals seen by CPC practitioners will benefit from the CPC practice transformation that includes the integration of behavioral healthcare into physical health sites. Most medical costs occur outside of a PCP, but primary care practitioners can guide many decisions that impact those broader costs, improving cost efficiency and care quality.

Each CPC practice works with BH partners to coordinate care for individuals with co-occurring BH and physical health (PH) conditions. This includes coordination on SUD treatment. Joining the CPC program gives practices access to data and reports that provide actionable, timely information needed to make better decisions about outreach, care and referrals.

Each CPC practice is required to create a care plan for all high-risk patients as identified by the practice’s risk stratification system. The practices must ensure follow-up after hospital discharges. To do this the CPC practice establishes relationships with all emergency departments (EDs) and hospitals from which they frequently get referrals and consistently obtains patient discharge summaries and conducts appropriate follow-up care.
The MCP plays a key role in supporting the CPC practice’s with achieving optimal population-level health outcomes. MCPs have a relationship with each CPC practice and provide support as requested by the CPC practice (e.g., cross system collaboration, information sharing, addressing social determinants of health, transition of care, etc. MCPs may also choose to care manage members who are not identified by the CPC practice’s high-risk stratification algorithm as further described below.

**Care Coordination in Plans**

MCOPs are required to provide care management to all enrolled members. MCPs must assure care management services and supports are available to individuals when needed. Expectations for both care management programs are similar and are outlined below. The plans’ care management programs incorporate: person and family centeredness; timely, proactive planned communication and action; the promotion self-care and independence; emphasis on cross continuum and system collaboration (e.g., BH) and the comprehensive consideration of physical, behavioral and social determinants of health.

In order to determine the level of care management services and supports, the plans conduct assessments of members’ physical and behavioral health, social and safety needs including identification of co-occurring conditions. Based on the needs assessment, a person-centered care plan with goals, interventions and outcomes is developed in conjunction with, and support of, the managing clinician and the member. The plan’s care manager and team then work to identify, address and remove barriers to care, secure resources, coordinate with providers across systems and facilitate transitions.

The plans also manage transitions of care between both PH and BH settings in order to prevent unplanned or unnecessary readmissions, emergency department visits, and/or adverse outcomes. The plans provide transition support to members attributed to CPC practices upon request. The plans are required to have a process for the following:

- Identify members who require assistance transitioning between settings.
- Develop a method for evaluating risk of readmission in order to determine the intensity of follow up required for the member after the date of discharge.
- Designate plan staff who will communicate with the discharging facility and inform the facility of the plan’s designated contacts.
- Ensure timely notification and receipt of admission dates, discharge dates and clinical information is communicated between plan departments, care settings and with the primary care provider, as appropriate.
- Participate in discharge planning activity with the facility including arranging for safe discharge placement and facilitating clinical hand-offs between the discharging facility and the plan.
- Obtain a copy of the discharge/transition plan.
- Arrange for services specified in the discharge/transition plan.
- Conduct timely follow up with the member and the member’s primary provider to ensure post discharge services have been provided.
When a plan is contacted by an inpatient facility with a request to participate in discharge planning, plans ensure a safe discharge placement and services are arranged for the member.

**Targeted Case Management**

Ohio has historically offered SUD targeted case management to individuals in Medicaid receiving alcohol or SUD treatment services from a certified or licensed treatment program. SUD case management includes four components: assessment/reassessment, development and revision of an individualized care plan, referral and monitoring and follow up activities. The goal of SUD case management is to determine the need for any medical, educational, social or other services as the individual transitions to the community and to address those needs on an on-going basis to ensure the success of the individual in the community.

**Future State:**

To develop a coordinated statewide strategy to address the opioid epidemic, other substance use disorders, and serious mental illness, the state has been facilitating regular stakeholder meetings with behavioral health providers for well over a year. These efforts have culminated in the development of possible care coordination models that are designed to improve care through intensive care coordination for individuals with substance use disorders (SUD) or serious mental illness (SMI). Initial efforts focused upon individuals with SUD/OUD/SPMI with any of the following conditions:

- a primary psychiatric diagnosis, or
- a primary or secondary diagnosis of OUD/SUD, including individuals who had received Medication Assisted Treatment for any substance use disorder; or
- individuals admitted to residential or inpatient facilities for diagnoses that included SUD or SMI.

With the recent change in administration at the state level, and Ohio’s subsequent request for approval of an 1115 Substance Use Disorder Waiver Demonstration, ODM and OhioMHAS have decided to use the flexibility extended to state agencies within the context of the 1115 Waiver Demonstration to re-evaluate care coordination strategies and develop tailored care coordination model(s) specifically for individuals with substance use disorders, including Opioid Use Disorder.

Accordingly, in order to make improvements to the current policies that support this milestone, the state will conduct a review of SUD service utilization pre and post the 01/01/2018 implementation of the redesign of Ohio’s behavioral health benefit package of services provided by agencies certified by OhioMHAS and hospital outpatient facilities that also furnish these behavioral health services. This analysis will provide an inventory of SUD treatment services provided, patterns of treatment including retention in care, and the current system capacity available at all ASAM levels of care including variations in treatment available in urban and rural locations. Most importantly the inventory will identify specific populations accessing treatment, including children, adults, and those with co-morbid conditions. Using this inventory, the state will develop care coordination models to address deficits and challenges in providing consistent treatment.
SUD/OUD treatment for the identified populations.

<table>
<thead>
<tr>
<th>Summary of Actions Needed</th>
<th>Milestone</th>
<th>Timeline Post Waiver Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>Review data and conduct analysis of individuals with SUD</td>
<td>Milestone 6</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Based upon data analysis develop care coordination model(s) specific to identified populations</td>
<td>Milestone 6</td>
<td>12 to 24 months</td>
</tr>
<tr>
<td>Implement care coordination for identified populations</td>
<td>Milestone 6</td>
<td>12 to 24 months</td>
</tr>
</tbody>
</table>

**Section II. Implementation Administration**
Contact information for Implementation Plan Point of Contact:

**Behavioral Health Policy**
Name and Title: Peggy Smith, Section Chief, Office of Behavioral Health
Telephone number: 614-752-5041
Email Address: peggy.smith@medicaid.ohio.gov

**Managed Care Policy**
Name and Title: Roxanne Richardson, Deputy Director, Managed Care
Telephone Number: 614-752-0503
Email Address: Roxanne.Richardson@medicaid.ohio.gov
Section III. Relevant Documents
Attachment A. SUD Health Information Technology Plan

SUD Demonstration Milestone 5.0, Specification 3: Implementation of Strategies to Increase Utilization and Improve Functionality of PDMP

The specific milestones to be achieved by developing and implementing an SUD Health Information Technology (IT) Plan include:

- Enhancing the health IT functionality to support PDMP interoperability.
- Enhancing and/or supporting clinicians in their usage of the state’s PDMP.

The state should provide CMS with an analysis of the current status of its health IT infrastructure/"ecosystem" to assess its readiness to support PDMP interoperability. Once completed, the analysis will serve as the basis for the health IT functionalities to be addressed over the course of the demonstration — or the assurance described above.

The SUD Health IT Plan should detail the current and planned future state for each functionality/capability/support — and specific actions and a timeline to be completed over the course of the demonstration — to address needed enhancements. In addition to completing the summary table below, the state may provide additional information for each Health IT/PDMP milestone criteria to further describe its plan.
### Table: State Health IT/PDMP Assessment and Plan

<table>
<thead>
<tr>
<th>Milestone Criteria</th>
<th>Current State</th>
<th>Future State</th>
<th>Summary of Actions Needed</th>
</tr>
</thead>
</table>
| Implementation of comprehensive treatment and prevention strategies to address Opioid Abuse and OUD, that is:  
  • Enhance the state’s health IT functionality to support its PDMP.  
  • Enhance and/or support clinicians in their usage of the state’s PDMP. | Provide an overview of current PDMP capabilities, health IT functionalities to support the PDMP, and supports to enhance clinicians’ use of the state’s health IT functionality to achieve the goals of the PDMP. | Provide an overview of plans for enhancing the state’s PDMP, related enhancements to its health IT functionalities, and related enhancements to support clinicians’ use of the health IT functionality to achieve the goals of the PDMP. | Specify a list of action items needed to be completed to meet the HIT/PDMP milestones identified in the first column. Include persons or entities responsible for completion of each action item. Include timeframe for completion of each action item. |

### PDMP Functionalities

**PDMP Functionalities**

<table>
<thead>
<tr>
<th>PDMP Functionalities</th>
<th>Current State</th>
<th>Future State</th>
<th>Summary of Actions Needed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enhanced interstate data sharing in order to better track patient specific prescription data.</td>
<td>Ohio’s PDMP participates in PMP Interconnect. The system allows a user to search PDMPs in 20 other states, including all of Ohio’s border states.</td>
<td>Ohio will continue to grant access to PDMP users from other states via the PMP Interconnect platform. This will depend on each state’s ability to share data.</td>
<td>As data sharing is dependent on other states (including necessary changes to state law), there are no milestones that can be listed.</td>
</tr>
</tbody>
</table>
| Enhanced “ease of use” for prescribers, other state and federal stakeholders. | Ohio is the first state in the country to pay all costs for the integration of PDMP data into EHRs and pharmacy dispensing systems. This allows for instant access to PDMP data as part of the healthcare providers workflow. County-based integration statistics are included as an attachment to this document. | The Board of Pharmacy will continue to onboard new EHR and pharmacy dispensing system vendors with the goal of achieving a 90% integration rate of all providers (prescribers and pharmacies). | Contacting vendors and coordinating the completion of legal agreements and testing is the responsibility of OARRS Integration Project Manager in collaboration with the PDMP vendor, Appriss Health. As of June 17, 2019, 56.5% of pharmacies have completed integration  
  As of June 17, 2019, 86.8% of prescribers have completed integration.  
  (See Attachment C: Integration Maps for Pharmacies and Prescribers) |
<table>
<thead>
<tr>
<th>Milestone Criteria</th>
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<th>Future State</th>
<th>Summary of Actions Needed</th>
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</thead>
<tbody>
<tr>
<td>Enhanced connectivity between the state’s PDMP and any statewide, regional or local HIE.</td>
<td>Ohio’s two HIEs are now fully integrated with the state’s PDMP.</td>
<td>As both of the state’s HIEs are integrated, there are no future plans for enhanced connectivity at this time.</td>
<td>N/A</td>
</tr>
<tr>
<td>Enhanced identification of long-term opioid use directly correlated to clinician prescribing patterns (see also “Use of PDMP” #2 below).</td>
<td>Currently, there are no activities to correlate long-term opioid use directly to clinician prescribing patterns.</td>
<td>The Board of Pharmacy will explore the possibility of engaging in this type of analysis in conjunction with the ODM through the hiring of a data analyst.</td>
<td>ODM hired a data analyst in January of 2019. For this milestone criteria two tasks have been developed. A description of the tasks and progress made to date on them can be found in Attachment D.</td>
</tr>
</tbody>
</table>

**Current and Future PDMP Query Capabilities**

Facilitate the state’s ability to properly match patients receiving opioid prescriptions with patients in the PDMP (i.e., the state’s master patient index strategy with regard to PDMP query).

Ohio’s PDMP vendor, Appriss Health, recently deployed an enhanced patient record matching solution, known as ApprissID. ApprissID incorporates advanced machine learning and consolidated algorithms to create a smart system capable of providing unmatched patient record matching results. The new solution is dynamic, allowing new IDs to be connected, deleted and evolve in real-time. More information regarding ApprissID can be found here: [https://hitconsultant.net/2019/05/15/appriss-machine-learning-powered-patient-matching-solution/#.XNwxNExFyUm](https://hitconsultant.net/2019/05/15/appriss-machine-learning-powered-patient-matching-solution/#.XNwxNExFyUm).

Ohio’s PDMP director will provide regular feedback on patient matching to Appriss Health to improve the overall functionality of the system.

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<table>
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</thead>
<tbody>
<tr>
<td>Use of PDMP – Supporting Clinicians with Changing Office Workflows/Business Processes</td>
<td>Ohio is the first state in the country to pay all costs for the integration of PDMP data into EHRs and pharmacy dispensing systems. This allows for instant access to PDMP data as part of the healthcare providers workflow. County-based integration statistics are included as an attachment to this document.</td>
<td>The Board of Pharmacy will continue to onboard new EHR and pharmacy dispensing system vendors with the goal of achieving a 90% integration rate of all providers (prescribers and pharmacies).</td>
<td>Contacting vendors and coordinating the completion of legal agreements and testing is the responsibility of OARRS Integration Project Manager in collaboration with the PDMP vendor, Appriss Health. See Attachment C for percentage of the integration rate for prescribers and pharmacies.</td>
</tr>
<tr>
<td>Develop enhanced provider workflow/business processes to better support clinicians in accessing the PDMP prior to prescribing an opioid or other controlled substance to address the issues, which follow.</td>
<td>Ohio has adopted Appriss Health’s NarxCare program as its PDMP platform. NarxCare is a comprehensive platform that aggregates and analyzes prescription information from providers and pharmacies and presents visual, interactive information, as well as advanced analytic insights, complex risk scores and more to help physicians, pharmacists and care teams to provide better patient care and safety. Furthermore, NarxCare provides tools and resources that support patients’ needs and connects them to treatment, if necessary. This information, insight and functionality is all accessed in clinical workflow via EHRs and pharmacy management systems, as well as through the PDMP website.</td>
<td>NarxCare allows the Board to collect additional non-PDMP based data for inclusion in the PDMP report. The first non-PDMP data to be included will be flags in the system for those who are participating in one of Ohio’s drug court programs. There are plans to include other data sources such as non-fatal overdose deaths. The Board is also working on the inclusion of naltrexone to be reported to the PDMP to identify individuals who have been treated for SUD.</td>
<td>The PDMP Administrator along with the PDMP Vendor, Appriss Health, are responsible for the development of processes and system testing for the inclusion of additional patient data. The Ohio Supreme Court is working to compile regular data sets of drug court participants.</td>
</tr>
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</table>
### Master Patient Index/Identity Management

<table>
<thead>
<tr>
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<th>Future State</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Enhance the master patient index (or master data management service, etc.) in support of SUD care delivery.</td>
<td>Ohio recently transitioned from the original AWARxE patient matching algorithm, to Axis, Appriss' new master patient index. Axis uses not only PDMP data, but also a number of external data sources (USPS change of address, credit headers, etc.) to inform the system as to which similar entries may be the same patient, versus which are actual two different individuals.</td>
<td>Unlike the previous generation of patient matching software, Axis is capable of improving its matching capabilities over time. As Board of Pharmacy staff identify instances where the matching was incorrect, Axis is able to use that information to make better matching decisions in the future.</td>
<td>The Board of Pharmacy PDMP staff will continue to monitor the Axis system to ensure that appropriate matches are being made. As incorrect matches are identified, they will be corrected so that the system can continue to improve on its abilities to accurately match patients.</td>
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</table>

### Overall Objective for Enhancing PDMP Functionality and Interoperability

<table>
<thead>
<tr>
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<th>Future State</th>
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</thead>
<tbody>
<tr>
<td>Leverage the above functionalities/capabilities/supports (in concert with any other state health IT, TA or workflow effort) to implement effective controls to minimize the risk of inappropriate opioid overprescribing — and to ensure that Medicaid does not inappropriately pay for opioids.</td>
<td>Ohio recently implemented rules limiting the provision of initial prescriptions of opioids to treat acute pain. With limited exceptions, a prescriber is not permitted to prescribe more than a five-day supply for a minor or a seven-day supply for an adult. Additionally, the prescriptions cannot exceed 30 morphine equivalent daily dose. The rules went into effect in August 2017. The Board of Pharmacy is currently developing an enforcement plan with the State Medical Board, Nursing Board and Dental Board. In order to account of the exemptions, Ohio regulations require the inclusion of a diagnosis code on all prescriptions for controlled substances.</td>
<td>The Board of Pharmacy will implement an enforcement plan to minimize the risk of inappropriate overprescribing.</td>
<td>The PDMP Administrator will be responsible for the development of a referral report to the appropriate prescriber regulatory boards. Ohio’s prescriber regulatory boards will implement education and enforcement actions against prescribers who are in violation of the rules.</td>
</tr>
</tbody>
</table>
Ohio’s point of contact for the SUD Health IT Plan.

Name and Title: Matthew Williams, Data Systems Administrator
Telephone Number: 614-752-2411
Email Address: Matthew.Williams@medicaid.ohio.gov
Attachment C: Integration Maps
Pharmacies and Prescribers

<table>
<thead>
<tr>
<th>Total No. of Pharmacies</th>
<th>Total No. of Pharmacies Integrated</th>
<th>Percent Integrated</th>
</tr>
</thead>
<tbody>
<tr>
<td>2551</td>
<td>1441</td>
<td>56.487</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Total No. of Prescribers</th>
<th>Total No. of Prescribers Integrated</th>
<th>Percent Integrated</th>
</tr>
</thead>
<tbody>
<tr>
<td>51,467*</td>
<td>44,668</td>
<td>86.789</td>
</tr>
</tbody>
</table>
Attachment D: Development of the Opioid-related measures

The GRC analyst started in January 2019 and the work is still on-going. The major milestone has been: Development of the Opioid-related measure methodologies and baseline rates for the CICIP program as of June 2019 (Task 1). Task two work has not yet started. A description of each task is below.

1. Assisting with the development, coding and analysis of quality metrics for the Care Innovation and Community Improvement Program (CICIP). CICIP was developed to increase alignment of quality improvement strategies and goals between the State, Managed Care Organizations (MCO), and both public and nonprofit hospital agencies. The four agencies are large Medicaid safety-net and academic medical centers. The CICIP goal aligns with the Ohio Department of Medicaid (ODM) goal: Improve healthcare for Medicaid beneficiaries at risk of or with an opioid or other substance abuse disorder. The CICIP payment arrangement creates incentives for participating agencies to perform quality improvement program tasks, optimize care, and improve prescribing practices, resulting in less illicit drug use, more opioid addiction prevention, timely access to treatment and recovery support, and appropriate responses to crisis situations.

2. Working with staff at the Board of Pharmacy and the Ohio Department of Medicaid to develop predictive models related to opioid use disorder, including but not limited to CICIP quality metrics, health care utilization such as emergency department (ED) visits, and overdose events. One of the goals will be to develop a modeling framework for identifying high-risk individuals for possible interventions prior to adverse events.