**Requested Clarification for Maine’s SIM Operational Plan**

**Date: September 11, 2013**

This document identifies areas that require additional information and clarification regarding Maine’s model test and supporting operational plan. The information is designed to guide our follow-up discussion during which Maine and CMMI will identify priority action items required to initiate model testing.

1. **Accountability Targets**

To set expectations and foster mutual accountability, CMMI aims to articulate both the “test” being undertaken in the Maine SIM and what it aims to accomplish during the SIM testing period. Maine has broad goals for advancing statewide transformation and has provided some details in the Operational Plan of how the component models and support infrastructure will work in complement to achieve program goals. In places, additional information will help to establish accountability targets for this federal-state partnership and clarify for CMMI:

* Does the plan articulate specifically what will be accomplished by the end of SIM?
* Does the state indicate specifically how it will scale implementation to achieve the goal?
* What will the state have implemented and ready to be tested on October 1st?

***Below is a listing of information that CMMI requests the state provide as a supplement to the Operational Plan to*** ***establish accountability targets for the project***.

* The SIM milestone timeline indicates the earliest SIM specific activities will launch is Q1 2014. Please describe what will be tested starting Oct 1 and how many providers/participants will be engaged in each activity. For example,
* On October 1, there will be X number of MaineCare providers that will be able to receive notification that their patients were seen in an emergency department.
* On October 1, Maine has identified X number of behavioral health providers who will receive the EHR incentives. On January 1 – March 1, 2014 X of the behavioral health providers will be provided with the necessary equipment and training to begin to use EHRs. Each quarter Maine will add an additional X providers.
* On October 1, X number of Health home providers will participate in the QC Learning Collaborative. To date, x number of improvement coaches been hired and have been assigned to practice sites.
* On October 1st, Maine will begin to test the CHW pilot curriculum in X number of sites/communities
* On October 1st, Maine will identify X number of participants to be included in the Behavioral Health measures PTE process.
* Please provide a list of specific milestones/metrics for each component of the SIM investment for Test Year 1 ($10, 085,098.19) including quarterly targets for each milestone/metric. (Examples of milestones are provided but should be relevant to the specific activities planned during year 1)
  + Strengthen Primary Care:
    - How many providers/practices will become PCMHs in year 1?
  + Integrate Primary Care and Behavioral Health
    - How many providers/practices will participate in the BH Learning Collaborative?
  + Link to Public Health and Special Populations
    - How many providers/practices will receive training in the National Diabetes Prevention Program
  + Support Development of New Payment Models
    - How many ACCs will be implemented in MaineCare? How many additional commercial ACOs will be implemented?
  + Use Centralized Data and Analysis to Drive Change
    - How many providers/practices/employers will be able to access the practice reports?
  + Increase Patient Engagement
    - How many patients will be able to partake in the patient portal program?

1. **Operational Plan: Questions to be Clarified**

The readiness review assessed the extent to which each State’s operational plan and supporting documentation conveyed the State has essential components are in place to begin the testing phase of its model. The following table lists DRR questions for which CMMI is requesting clarification or additional information, either because supporting evidence was lacking or because readiness to begin testing could not be determined from the information provided.

The questions have been separated into two categories. Accompanying the questions, you will find what specific information or clarification is being requested. CMMI will walk through each item on the state call to confirm what is being requested, the format and timeline for submitting requested information, and discuss strategies for coming into compliance with the requirements of the State Innovation Model Test.

* DRR Questions A: those which are critical to answer before advancing to Test Year 1
* DRR Questions B: those which should be clarified within 30 days of the start of Test Year 1 (Oct 30th, assuming a testing start date of Oct 1st).
* An “X” in the column headed “AT” indicates where submitting the Accountability Targets (above) will satisfy this request.

| DRR Questions A – Critical to answer before advancing to Test Year 1 | Specific information or clarification requested for review by CMMI | AT |
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| A1. Is the project governed by a board with the necessary governance and management structure, decision making authority, broad base of stakeholder representation and contractual and/or regulatory arrangements to be accountable for implementation of the proposed innovation model, including having authority over participants required for the project’s success? | Provide contractual or regulatory arrangements to formally govern project accountability and oversight |  |
| A3. Has the State specified and begun executing on specific mechanisms to coordinate private and public efforts around key test model elements and accountability necessary for implementing the proposed innovation model? | It is necessary to see more breadth across the executive branch in terms of leveraging other agencies (i.e. transportation, national resources, education, and economic development) within the state. |  |
| B7. For Track 1, Ready-to-Go States, has the State fully integrated or aligned its planned transformation with existing State Plan Amendment and waiver authorities? | If the SPAs for Stage B HH and ACCs are not issued in accordance with the timeline, how will this impact the test? |  |
| C9. Has the State designed, planned and begun implementing an outreach and recruitment program (per its Stakeholder Engagement Plan) consistent with the features of their innovation model? | Provide numbers of providers/participants that will be included in models, particularly in commercial plans and private organizations.  More explanation/documentation would be helpful as to how SIM will build on previous efforts and/or depart from them as necessary, particularly regarding LTSS | X |
| H22. Are participating payers required to implement key features of the proposed model under contract or are they otherwise committed to participating for the duration of the model testing period? | What is the rate of the payer participation in the models? What are the specific SIM-related requirements to which the payers are subject and/or the terms of their commitment? | X |
| H23. Are participating providers required to implement key features of the proposed model under contract or are they otherwise committed to participating for the duration of the model testing period? | What is the rate of provider participation in the models? What are the specific SIM-related requirements to which the providers are subject and/or the terms of their commitment? | X |
| K30. Has the state recruited new/additional staff and/or contractors (as budgeted in SIM application) to adequately support SIM activities? | Please provide a status update regarding hiring activities and timelines, and status update of the contracts required to carry out the operational plan. |  |

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| N35. Has the State developed an evidence-based financial model for sustaining new payment and service delivery model(s) after the testing phase is complete, based on leveraging a comprehensive set of funding sources? | Given that the partners/contractors are designing and executing most of the projects, how will the state ensure that the programs that are shown to be successful will continue after SIM funding has been expended? Who/what entity in the state will oversee that these innovations are embedded into the state’s policies and processes for improving care, improving health and decreasing costs? |  |
| P37. Has the State developed a project plan for completing Model Testing and implementing the proposed innovation model that is actionable by the project team (with assignments of responsibility) and provides detailed project tracking and reporting by the project oversight entity and CMS? | A project plan that includes the targets as described above, including the responsibilities for tracking the milestones is necessary. | X |
| P38. Are project activities specified / planned / structured appropriately in terms of sequencing and conducting activities in parallel to achieve results? | More of an explanation of how the sequence of model implementation and model support activities on the timeline will directly (or indirectly) impact future results.  The project plan would be enhanced by links to who's responsible for each phase/milestone | X |
| R43. Has the state arranged for internal resources or contracted with an entity for managing data collection and reporting processes (self-evaluation, reporting to CMMI, and financial data for multi-payer systems)? | Please include a status update regarding contractual support for data collection and reporting (draft RFP, timing, etc.). |  |
| T49. Has the State planned and implemented a process for managing and mitigating risks over the course of the proposed transformation project? | Documentation showing evidence of more specific processes or plans for mitigating risks, such as contractual information related to conducting a study of risks and mitigation strategies or announcements, committee action, executive orders, task force formation, pending legislation, etc. related to studying risk associated with the transformation program. |  |

| DRR Questions B – Provide clarification within 30 days of the start of Test Year 1 | Specific information or clarification requested for review by CMMI | AT |
| --- | --- | --- |
| G15. Has the state conducted a thorough analysis to identify and assess the state policy and regulatory levers available to accelerate the implementation of the proposed innovation model? | The state documents multiple legislative activities designed to bring its ongoing and newly implemented initiatives into better alignment with the SIM vision.  The State should provide more-specific documentation of the processes and analyses used to gauge the need for amendments/new legislation. |  |
| I24. Has the state defined a common set of performance measures, consistent with endorsed measures (e.g. NQF, Meaningful Use, CDC recommended population health measures , CMMI Core measure set), including quality, patient satisfaction, financial and health outcomes, aligned with existing quality initiatives and relevant to the specific innovation model proposed? | It would be helpful to see more discussion and emphasis on the measures to be used to track financial outcomes/savings, and the calculations involving the total cost of care. |  |
| M34. Has the state initiated training of practice transformation and care process redesign supports that leverage existing statewide learning and action networks (e.g., PCMH, Health Home, regional extension centers) and other communication vehicles to engage providers? | It would be helpful to see a plan for when and how QI support for BHH organizations will be implemented |  |