Medicaid Section 1115 Serious Mental Illness and Serious Emotional Disturbance Demonstrations Monitoring Report Template

Note: PRA Disclosure Statement to be added here

1. Title page for the state's serious mental illness and serious emotional disturbance (SMI/SED) demonstration or the SMI/SED component of the broader demonstration

The state should complete this title page at the beginning of a demonstration and submit as the title page for all monitoring reports. The content of this table should stay consistent over time. Definitions for certain rows are below the table.

	Iltah
State	Utah
Demonstration name	Utah's Medicaid Reform 1115 Demonstration
Approval period for section 1115 demonstration	07/01/2022 - 06/30/2027
SMI/SED demonstration start date ^a	12/16/2020
Implementation date of SMI/SED demonstration, if different from SMI/SED demonstration start date ^b	01/01/2021
SMI/SED (or if broader demonstration, then SMI/SED - related) demonstration goals and objectives	The goal of this approval is for the state to maintain and enhance access to mental health services, opioid use disorder (OUD) and other substance use disorder (SUD) services and continue delivery system improvements for these services to provide more coordinated and comprehensive treatment to Medicaid beneficiaries with serious mental illness (SMI) and/or SUD. This demonstration will provide the state with authority to provide high quality, clinically appropriate treatment to beneficiaries with SMI while they are short-term residents in residential and inpatient treatment settings that qualify as an IMD. It will also support state efforts to enhance provider capacity, improve the availability of Medication Assisted Treatment (MAT) and improve access to a continuum of SMI evidence-based services at varied levels of intensity, including withdrawal management services.
SMI/SED demonstration year and quarter	SMI/SED DY4Q4
Reporting period	04/01/2024 - 6/30/2024

^a **SMI/SED demonstration start date:** For monitoring purposes, CMS defines the start date of the demonstration as the *effective date* listed in the state's STCs at time of SMI/SED demonstration approval. For example, if the state's STCs at the time of SMI/SED demonstration approval note that the SMI/SED demonstration is effective January 1, 2020 – December 31, 2025, the state should consider January 1, 2020 to be the start date of the SMI/SED demonstration. Note that the effective date is considered to be the first day the state may begin its SMI/SED demonstration. In many cases, the effective date is distinct from the approval date of a demonstration; that is, in certain cases, CMS may approve a section 1115 demonstration with an effective date that is in the future. For example, CMS may approve an extension request on 12/15/2020, with an effective date of 1/1/2021 for the new demonstration period. In many cases, the effective date also differs from the date a state begins implementing its demonstration.

^b **Implementation date of SMI/SED demonstration:** The date the state began claiming federal financial participation for services provided to individuals in institutions of mental disease.

2. Executive summary

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

During this quarter, the State Medicaid system continued to see the impact of the unwinding efforts due to the end of the public health emergency declaration and the resulting maintenance of effort which had led to continued increased growth in Medicaid enrollment. Several metrics decreased likely due to the decrease in enrollment numbers. Utah will continue to monitor metrics to distinguish the effects of the public health emergency unwinding on the system versus the effects the waiver is having on the system. Utah also continues to address data issues due to the new PRISM system.

3. Narrative information on implementation, by milestone and reporting topic

Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
1. Ensuring Quality of Care in Psychiatric Hospitals	and Residential Se		
1.1. Metric trends			
1.1.1. The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 1.	Х		
1.2. Implementation update			
 1.2.1. Compared to the demonstration design and operational details, the state expects to make the following changes to: 1.2.1a. The licensure or accreditation processes for participating hospitals and residential settings 	Х		
1.2.1b. The oversight process (including unannounced visits) to ensure participating hospital and residential settings meet state's licensing or certification and accreditation requirements	Х		
1.2.1c. The utilization review process to ensure beneficiaries have access to the appropriate levels and types of care and to provide oversight on lengths of stay	Х		
1.2.1d. The program integrity requirements and compliance assurance process	Х		
1.2.1e. The state requirement that psychiatric hospitals and residential settings screen beneficiaries for co-morbid physical health conditions, SUDs, and suicidal ideation, and facilitate access to treatment for those conditions	Х		
1.2.1f. Other state requirements/policies to ensure good quality of care in inpatient and residential treatment settings	Х		
1.2.2. The state expects to make other program changes that may affect metrics related to Milestone 1.	Х		

Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
2. Improving Care Coordination and Transitions to	Community-Based	Care (Milestone 2)	
2.1. Metric trends			

2.1.1. The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 2.	#6d,e: Medication Continuation Following Inpatient Psychiatric Discharge	#6d,e Schizophrenia: The number of beneficiaries with with schizophrenia who filled a prescription for evidence-based medication within 2 days prior to discharge and 30 days post- discharge increased by 2.4% due to unknown reasons. The state will continue to monitor this metric.
	#7-30: Follow-up After Hospitalization for Mental Illness: Ages 6-17 (FUH- CH)	#7-30: The percentage of discharges for children ages 6 to 17 who were hospitalized for treatment of selected mental illness or intentional self-harm diagnoses and who had a follow-up visit with a mental health practitioner within 30 days decreased by 10.9% due to unknown reasons. FUH is primarily a duty of the managed care plans. The state will follow up with them.
	#7-7: Follow-up After Hospitalization for Mental Illness: Ages 6-17 (FUH- CH)	#7-7: The percentage of discharges for children ages 6 to 17 who were hospitalized for treatment of selected mental illness or intentional self-harm diagnoses and who had a follow-up visit with a mental health practitioner within 7 days decreased by 8.2% due to unknown reasons. FUH is primarily a duty of the managed care plans. The state will follow up with them.
	#9-30: Percentage of emergency department (ED) visits for beneficiaries age 18 and older with a primary diagnosis of alcohol or other drug (AOD) abuse dependence who had a follow-up visit for AOD abuse or dependence.	#9-30: The percentage of emergency department (ED) visits for beneficiaries age 18 and older with a primary diagnosis of alcohol or other drug (AOD) abuse dependence who had a follow-up visit for AOD abuse or dependence within 30 days decreased by 3.1% due to unknown reasons. The state will continue to monitor this metric.
	#9-7: Percentage of emergency	#9-7: The percentage of emergency department (ED) visits for beneficiaries age 18 and older with a primary diagnosis of alcohol or

department (ED) visits for beneficiaries age 18 and older with a primary diagnosis of alcohol or other drug (AOD) abuse dependence who had a follow-up visit for AOD abuse or dependence.	other drug (AOD) abuse dependence who had a follow-up visit for AOD abuse or dependence within 7 days decreased by 2.3% due to unknown reasons. The state will continue to monitor this metric.
#10-30: Percentage of emergency department (ED) visits for beneficiaries age 18 and older with a primary diagnosis of mental illness or intentional self- harm and who had a follow-up visit for mental illness within 30 days.	#10-30: The percentage of emergency department (ED) visits for beneficiaries age 18 and older with a primary diagnosis of mental illness or intentional self-harm and who had a follow-up visit for mental illness within 30 days increased by 2.7% due to unknown reasons. The state will continue to monitor this metric.
#10-7: Percentage of emergency department (ED) visits for beneficiaries age 18 and older with a primary diagnosis of mental illness or intentional self-	#10-7: The percentage of emergency department (ED) visits for beneficiaries age 18 and older with a primary diagnosis of mental illness or intentional self-harm and who had a follow-up visit for mental illness within 7 days increased by 2.7% due to unknown reasons. The state will continue to monitor this metric.

Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
		harm and who had a follow-up visit for mental illness within 7 days.	
2.2. Implementation update			
 2.2.1. Compared to the demonstration design and operational details, the state expects to make the following changes to: 2.2.1a. Actions to ensure that psychiatric hospitals and residential treatment settings carry out intensive pre-discharge planning, and include community-based providers in care transitions 	Х		
2.2.1b. Actions to ensure psychiatric hospitals and residential settings assess beneficiaries' housing situations and coordinate with housing services providers	Х		
2.2.1c. State requirement to ensure psychiatric hospitals and residential settings contact beneficiaries and community-based providers within 72 hours post discharge	Х		
2.2.1d. Strategies to prevent or decrease the lengths of stay in EDs among beneficiaries with SMI or SED (e.g., through the use of peers and psychiatric consultants in EDs to help with discharge and referral to treatment providers)	Х		
2.2.1e. Other State requirements/policies to improve care coordination and connections to community-based care	Х		
2.2.2. The state expects to make other program changes that may affect metrics related to Milestone 2.	Х		

Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
3. Access to Continuum of Care, Including Crisis St	,	· · · ·	*
3.1. Metric trends			
3.1.1. The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 3.		#13: Mental Health Services Utilization – Inpatient	#13: The number of beneficiaries in the demonstration population who use inpatient services related to mental health decreased by 8.9% most likely due to the unwinding efforts.
		#14: Mental Health Services Utilization – Intensive Outpatient and Partial Hospitalization	#14: The number of beneficiaries in the demonstration population who used intensive outpatient and/or partial hospitalization services related to mental health decreased by 5.6% most likely due to the state's unwinding efforts.
		#15: Mental Health Services Utilization – Outpatient	#15: The number of beneficiaries in the demonstration population who used outpatient services related to mental health increased by 4.3% despite Medicaid numbers decreasing due to unwinding activities. This was probably due to PRISM issues with encounter data.
		#16: Mental Health Services Utilization – ED	#16: The number of beneficiaries in the demonstration population who use emergency department services for mental health decreased by 11.4%. Large percentage changes are normal for this metric due to the small amount of beneficiaries in this metric. The total change was ~2 members. This metric has had large percentage swings in previous reporting periods as well.
		#18: Mental Health Services Utilization – Any Services	#18: The number of beneficiaries in the demonstration population who used any services related to mental health increased by 2.1% despite Medicaid numbers decreasing due to unwinding activities. This was probably due to PRISM issues with encounter data.

Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
3.2. Implementation update			
 3.2.1. Compared to the demonstration design and operational details, the state expects to make the following changes to: 3.2.1a. State requirement that providers use an evidenced-based, publicly-available patient assessment tool to determine appropriate level of care and length of stay 	Х		
3.2.1b. Other state requirements/policies to improve access to a full continuum of care including crisis stabilization	Х		
3.2.2. The state expects to make other program changes that may affect metrics related to Milestone 3.	Х		

Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
4. Earlier Identification and Engagement in Treatm 4.1. Metric trends	ent, Including Thro	ough Increased Integ	gration (Milestone 4)
4.1.1. The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to Milestone 4.		#23: Percentage of beneficiaries ages 18 to 75 with a serious mental illness and diabetes (type 1 and type 2) whose most recent Hemoglobin A1c (HbA1c) level during the measurement year is >9.0%.	#23: The percentage of beneficiaries ages 18 to 75 with a serious mental illness and diabetes (type 1 and type 2) whose most recent Hemoglobin A1c (HbA1c) level during the measurement year is >9.0% increased by 5.6% due to unknown causes. The state will continue to monitor this metric.
		#30: Percentage of Medicaid beneficiaries age 18 years and older with new antipsychotic prescriptions who have completed a follow-up visit with a provider with prescribing authority within four weeks (28 days) of prescription of an antipsychotic medication.	#30: The percentage of Medicaid beneficiaries age 18 years and older with new antipsychotic prescriptions who have completed a follow-up visit with a provider with prescribing authority within four weeks (28 days) of prescription of an antipsychotic medication decreased by 72.1% due to unknown reasons. The state will continue to monitor this metric.

Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
4.2. Implementation update			
 4.2.1. Compared to the demonstration design and operational details, the state expects to make the following changes to: 4.2.1a. Strategies for identifying and engaging beneficiaries in treatment sooner (e.g., with supported education and employment) 	Х		
4.2.1b. Plan for increasing integration of behavioral health care in non-specialty settings to improve early identification of SED/SMI and linkages to treatment	Х		
4.2.1c. Establishment of specialized settings and services, including crisis stabilization services, focused on the needs of young people experiencing SMI or SED	Х		
4.2.1d. Other state strategies to increase earlier identification/engagement, integration, and specialized programs for young people	Х		
4.2.2. The state expects to make other program changes that may affect metrics related to Milestone 4.	Х		

Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
5. SMI/SED health information technology (health 5.1. Metric trends	IT)		
5.1.1 The state reports the following metric trends, including all changes (+ or -) greater than 2 percent related to its health IT metrics.		Q2: Number of providers managed in provider directory Q3: Number of raquests for	Q2: The number of providers managed in the Utah Medicaid provider directory increased by 14% due to more providers enrolling.Q3: The number of requests for community based resources fulfilled using statewide resources a directory during the time period was
		requests for community based resources fulfilled using statewide resource e- directory. Requests for resources are submitted via phone calls and online requests through the 211 website. Call centers provide aggregated data about the calls to 2-1-1 Counts, which systematically tracks and summarizes callers' needs. Data can be accessed on the 211 website.	using statewide resource e-directory during the time period was 73,697. The metric for the previous report has changed due to updates to the 211 data system. The previous report's number is 72,182.

Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
5.2. Implementation update			
5.2.1. Compared to the demonstration design and operational details, the state expects to make the following changes to:5.2.1a. The three statements of assurance made in the state's health IT plan	Х		
5.2.1b. Closed loop referrals and e-referrals from physician/mental health provider to physician/mental health provider and/or physician/mental health provider to community-based supports	Х		
5.2.1c. Electronic care plans and medical records	Х		
5.2.1d. Individual consent being electronically captured and made accessible to patients and all members of the care team	Х		
5.2.1e. Intake, assessment and screening tools being part of a structured data capture process so that this information is interoperable with the rest of the health IT ecosystem	Х		
5.2.1f. Telehealth technologies supporting collaborative care by facilitating broader availability of integrated mental health care and primary care	Х		
5.2.1g. Alerting/analytics	Х		
5.2.1h. Identity management	Х		
5.2.2. The state expects to make other program changes that may affect metrics related to health IT.	Х		

Prompt	State has no trends/update to report (place an X)	Related metric(s) (if any)	State response
6. Other SMI/SED-related metrics			
6.1. Metric trends			
6.1.1. The state reports the following metric trends, including all changes (+ or -) greater than two 2 percent related to other SMI/SED-related metrics.		#36: Grievances #37: Appeals #38: Critical Incidents	#36- Grievances showed an increase of more than 2%. The state will monitor future quarters to determine if this trend continues #37- Appeals showed an increase of more than 2%. The state will monitor future quarters to determine if this trend continues. #38- Critical incidents showed an increase of more than 2%. The state will monitor future quarters to determine if this trend continues.
6.2. Implementation update			
6.2.1. The state expects to make the following program changes that may affect other SMI/SED-related metrics.	Х		

4. Narrative information on other reporting topics

Prompt	State has no trends/update to report (place an X)	State response
7. Annual Assessment of the Availability of Mental Health Services (Annual Availability Assessment)		
7.1. Description of changes to baseline conditions and practices		
7.1.1. Describe and explain any changes in the mental health service needs (for example, prevalence and distribution of SMI/SED) of Medicaid beneficiaries with SMI/SED compared to those described in the Initial Assessment of the Availability of Mental Health Services. Recommended word count is 500 words or less.	Х	

Prompt	State has no trends/update to report (place an X)	State response
7.1.2. Describe and explain any changes to the organization of the state's Medicaid behavioral health service delivery system compared to those described in the Initial Assessment of the Availability of Mental Health Services. Recommended word count is 500 words or less.	Х	
7.1.3. Describe and explain any changes in the availability of mental health services for Medicaid beneficiaries with SMI/SED in the state compared to those described in the Initial Assessment of the Availability of Mental Health Services. At minimum, explain any changes across the state in the availability of the following services: inpatient mental health services; outpatient and community-based services; crisis behavioral health services; and care coordination and care transition planning. Recommended word count is 500 words or less.	Х	
7.1.4. Describe and explain any changes in gaps the state identified in the availability of mental health services or service capacity while completing the Annual Availability Assessment compared to those described in the Initial Assessment of the Availability of Mental Health Services. Recommended word count is 500 words or less.	Х	
7.1.5. Describe and explain whether any changes in the availability of mental health services have impacted the state's maintenance of effort (MOE) on funding outpatient community-based mental health services. Recommended word count is 500 words or less.	Х	

Prompt	State has no trends/update to report (place an X)	State response	
7.2. Implementation update			
 7.2.1. Compared to the demonstration design and operational details, the state expects to make the following changes to: 7.2.1a. The state's strategy to conduct annual assessments of the availability of mental health services across the state and updates on steps taken to increase availability 	Х		
7.2.1b. Strategies to improve state tracking of availability of inpatient and crisis stabilization beds	Х		
8. Maintenance of effort (MOE) on funding outpatie	ent community-base	ed mental health services	
8.1. MOE dollar amount			
8.1.1. Provide as a dollar amount the level of state appropriations and local funding for outpatient community-based mental health services for the most recently completed state fiscal year.		SFY22 Outpatient Community-Based Mental Health Services Sum of Federal Funds: \$331,410,227.12 Sum of State General Funds: \$27,277,357.14 Sum of State County Funds: \$57,285,320.73 Sum of Total Funds \$415,972,905.00	
8.2. Narrative information			
8.2.1. Describe and explain any reductions in the MOE dollar amount below the amount provided in the state's application materials. The state should confirm that it did not move resources to increase access to treatment in inpatient or residential settings at the expense of community-based services.		The state has not reduced the MOE dollar amount below what was provided in the state's application materials. The state has increased funding for community-based services.	

	State has no trends/update to report (place	GL 4	
Prompt	an X)	State response	
9. SMI/SED financing plan			
9.1. Implementation update			
 9.1.1. Compared to the demonstration design and operational details, the state expects to make the following changes to: 9.1.1a. Increase availability of non-hospital, non-residential crisis stabilization services, including services made available through crisis call centers, mobile crisis units, and observation/assessment centers, with a coordinated community crisis response that involves law enforcement and other first responders 	Х		
9.1.1b. Increase availability of on-going community-based services, e.g., outpatient, community mental health centers, partial hospitalization/day treatment, assertive community treatment, and services in integrated care settings such as the Certified Community Behavioral Health Clinic model	Х		
10. Budget neutrality			
10.1. Current status and analysis			
10.1.1. Describe the current status of budget neutrality and an analysis of the budget neutrality to date. If the SMI/SED component is part of a broader demonstration, the state should provide an analysis of the SMI/SED-related budget neutrality and an analysis of budget neutrality as a whole.		For the current 1115 Waiver, the state estimates the SMI eligibility group will be budget neutral.	
10.2. Implementation update			
10.2.1. The state expects to make the following program changes that may affect budget neutrality.	Х		

	State has no trends/update
Prompt	to report (place an X)
11. SMI/SED-related demonstration operations and 11.1. Considerations	policy
11.1. Considerations 11.1. Considerations 11.1.1. The state should highlight significant SMI/SED (or if broader demonstration, then SMI/SED-related) demonstration operations or policy considerations that could positively or negatively impact beneficiary enrollment, access to services, timely provision of services, budget neutrality, or any other provision that has potential for beneficiary impacts. Also note any activity that may accelerate or create delays or impediments in achieving the SMI/SED demonstration's approved goals or objectives, if not already reported elsewhere in this document. See Monitoring Report Instructions for more detail.	Х
1.2. Implementation update	
11.2.1. The state experienced challenges in partnering with entities contracted to help implement the demonstration (e.g., health plans, credentialing vendors, private sector providers) and/or noted any performance issues with contracted entities.	Х
11.2.2. The state is working on other initiatives related to SMI/SED.	Х
11.2.3. The initiatives described above are related to the SMI/SED demonstration as described (The state should note similarities and differences from the SMI/SED demonstration).	Х
11.2.4. Compared to the demonstration design and operational details, the state expects to make the following changes to:11.2.4a. How the delivery system operates under the demonstration (e.g. through the managed care system or fee for service)	Х

Prompt	State has no trends/update to report (place an X)	State response
11.2.4b. Delivery models affecting demonstration participants (e.g. Accountable Care Organizations, Patient Centered Medical Homes)	Х	
11.2.4c. Partners involved in service delivery	Х	
11.2.4d. The state Medicaid agency's Memorandum of Understanding (MOU) or other agreement with its mental health services agency	Х	
12. SMI/SED demonstration evaluation update		
 12.1. Narrative information 12.1.1. Provide updates on SMI/SED evaluation work and timeline. The appropriate content will depend on when this report is due to CMS and the timing for the demonstration. There are specific requirements per the Code of Federal Regulations (CFR) for annual reports. See Monitoring Report Instructions for more details. 12.1.2. Provide status updates on deliverables related to the demonstration evaluation and indicate whether 		The state submitted PCG's (independent evaluator) revised evaluation design to CMS in early February 2024. CMS approved the design on February 27, 2024. The final July 2017 through June, 2022 Summative Evaluation was submitted to CMS on March 29, 2024.
the expected timelines are being met and/or if there are any real or anticipated barriers in achieving the goals and timeframes agreed to in the STCs.12.1.3. List anticipated evaluation-related		The SUD and SMI/SED Mid-Point Assessment will be submitted to CMS by June 30,
deliverables related to this demonstration and their due dates.		2025.
13. Other demonstration reporting		
13.1. General reporting requirements 13.1.1. The state reports changes in its implementation of the demonstration that might necessitate a change to approved STCs, implementation plan, or monitoring protocol.	Х	

Prompt	State has no trends/update to report (place an X)	State response	
13.1.2. The state anticipates the need to make future changes to the STCs, implementation plan, or monitoring protocol, based on expected or upcoming implementation changes.	Х		
13.1.3. The state identified real or anticipated issues submitting timely post-approval demonstration deliverables, including a plan for remediation.	Х		
 13.1.4. Compared to the demonstration design and operational details, the state expects to make the following changes to: 13.1.4a. The schedule for completing and submitting monitoring reports 	Х		
13.1.4b. The content or completeness of submitted monitoring reports and/or future monitoring reports	Х		
13.2. Post-award public forum			
13.2.1. If applicable within the timing of the demonstration, provide a summary of the annual post-award public forum held pursuant to 42 CFR § 431.420(c) indicating any resulting action items or issues. A summary of the post-award public forum must be included here for the period during which the forum was held and in the annual monitoring report.		The annual public forum was held on January 18, 2024, during the Medical Care Advisory Committee (MCAC) meeting. An overview of the 1115 demonstration populations was provided. No issues or concerns were raised.	

Prompt	State has no trends/update to report (place an X)	State response
14. Notable state achievements and/or innovations		
14.1. Narrative information		
14.1.1. Provide any relevant summary of	X	
achievements and/or innovations in demonstration		
enrollment, benefits, operations, and policies pursuant		
to the hypotheses of the SMI/SED (or if broader		
demonstration, then SMI/SED related) demonstration		
or that served to provide better care for individuals,		
better health for populations, and/or reduce per capita		
cost. Achievements should focus on significant		
impacts to beneficiary outcomes. Whenever possible,		
the summary should describe the achievement or		
innovation in quantifiable terms, e.g., number of		
impacted beneficiaries.		

*The state should remove all example text from the table prior to submission.

Note: Licensee and state must prominently display the following notice on any display of Measure rates:

The MPT, FUH-CH, FUH-AD, FUA-AD, FUM-AD, AAP, and APM measures (#13, 14, 15, 16, 17, 18, 7, 8, 9, 10, 26, 29) are Healthcare Effectiveness Data and Information Set (HEDIS®) measures that are owned and copyrighted by the National Committee for Quality Assurance (NCQA). HEDIS measures and specifications are not clinical guidelines, do not establish a standard of medical care and have not been tested for all potential applications. The measures and specifications are provided "as is" without warranty of any kind. NCQA makes no representations, warranties or endorsements about the quality of any product, test or protocol identified as numerator compliant or otherwise identified as meeting the requirements of a HEDIS measure or specification. NCQA makes no representations, warranties, or endorsement about the quality of any organization or clinician who uses or reports performance measures and NCQA has no liability to anyone who relies on HEDIS measures or specifications or data reflective of performance under such measures and specifications.

The measure specification methodology used by CMS is different from NCQA's methodology. NCQA has not validated the adjusted measure specifications but has granted CMS permission to adjust. A calculated measure result (a "rate") from a HEDIS measure that has not been certified via NCQA's Measure Certification Program, and is based on adjusted HEDIS specifications, may not be called a "HEDIS rate" until it is audited and designated reportable by an NCQA-Certified HEDIS Compliance Auditor. Until such time, such measure rates shall be designated or referred to as "Adjusted, Uncertified, Unaudited HEDIS rates."