

**Attachment GG**  
**WPC Reporting and Evaluation**

- a. **Progress Reports.** Each WPC Pilot Lead Entity (“Lead Entity”) shall submit mid-year and annual reports for the duration of the WPC Pilot according to the requirements in this Attachment. The State shall specify the manner and format in which WPC Pilots shall submit data for the mid-year and annual reports.
- b. **Mid-Year Reports.** Lead Entities of WPC Pilots shall submit a mid-year report to the State.
  - i. Reporting requirements shall be specified in guidance set forth by the State, and shall include:
    1. A minimum standard required data set for all WPC Pilots. The minimum required data shall include data points from the following categories at a minimum:
      - a. Participant characteristics
      - b. Number of participants
      - c. Type and volume of medical and non-medical services utilized
      - d. Type and volume of emergency department and inpatient services utilized
      - e. Total amount of overall funds spent
    2. Additional data and information as specified in Attachment MM WPC Requirements and Metrics and the approved WPC Pilot application.
    3. Additional data and information to support measurement of the purpose of the WPC evaluation as set forth in STC 123 including:
      - a. Improve coordination across participating entities including data and information sharing;
      - b. Improve beneficiary health outcomes;
      - c. Reduce avoidable utilization of emergency and inpatient services (ED, hospital and psychiatric inpatient);
      - d. Increase access to social services;
      - e. Improve care coordination across participating entities; and
      - f. Improve housing stability, if applicable.
    4. A list of participating entity and/or stakeholder meetings, as applicable, held during the period, including agendas, and a narrative description of program activities during the period including identified barriers, challenges, and successes.
    5. Data and other documentation as described in the WPC Pilot application demonstrating progress in the approved activities.
    6. The data described in the approved WPC Pilot application demonstrating the progress toward WPC Pilot goals in relation to the infrastructure, services, and other strategies as described in the

approved WPC Pilot application and WPC Pilot Special Terms and Conditions.

- ii. The mid-year report including data and information through June 30 shall be due to the State no later than 60 days after June 30 each year.
  - iii. For Program Year 1, no mid-year report shall be submitted.
  - iv. Upon submission of a complete (as determined by the State) mid-year report, the State will determine whether progress toward the WPC Pilot requirements approved in the WPC Application has been made. To the extent that progress has been made in a manner approved in the Application, notification of such and an interim payment in an amount proportional to the progress toward achievement of the WPC Pilot goals based on the approved annual total computable funding agreed to in the approved WPC Pilot application shall be paid to the WPC Pilot Lead Entity. If the state determines that less than 50% of the annual payment is due, the WPC Pilot will be given 14 days to respond and revise reports as appropriate. At the discretion of the State, a proportional amount of interim funding will be adjusted and paid.
  - v. Within 30 days of the determination of the interim payment due based on the mid-year report, the State will issue requests to the WPC Pilot for the necessary intergovernmental transfer amounts. The WPC Pilot entities will make intergovernmental transfer of funds to the State in the amount specified within 7 days of receiving the State's request. If the intergovernmental transfers are made within the requested timeframe, the payment will be paid within 14 days after the transfers are made.
- c. **Annual Reports.** On an annual basis, Lead Entities shall submit an annual report to the State for the purpose of demonstrating that the WPC Pilot is conducted in compliance with the requirements of the WPC Pilot as set forth in the STCs and attachments, the WPC Pilot approved application, any agreement between the State and the WPC Pilot Lead Entity, and/or policy letters and guidance set forth by the State. Lead Entities will submit their reports using the structured report template provided for this purpose by the State. The annual report will also be used to determine if the interventions were performed in the manner agreed upon in the WPC Pilot approved application and to report on the impact of the WPC Pilot interventions, as applicable and as described in the approved WPC Pilot application.
- i. Annual reporting requirements shall be specified in guidance put forth for WPC Pilot applications by the State and shall include at a minimum:
    - 1. The same data elements included in the minimum standard required data set from the mid-year report.
    - 2. The same additional data elements set forth in Attachment MM WPC Reporting and Requirements and as agreed to in the approved WPC Pilot application.
    - 3. A narrative describing the activities and interventions the WPC Pilot performed during the year for each component as described in the application including barriers, challenges, and successes.

4. A narrative of how the WPC Pilot is making progress toward accomplishing the objectives described in STC 123 (Mid-Point and Final Evaluations) and STC 112 (WPC Strategies)
  5. Progress achieved in the activities and interventions in the approved WPC Pilot application.
  6. For Program Year 1, the annual report shall consist of baseline data and information as set forth in this Attachment and Attachment MM, WPC Requirements and Metrics.
- ii. The annual report shall be due no later than 60 calendar days after the end of the program year unless otherwise specified by the State.
  - iii. Upon submission of a complete (as determined by the State) annual report, the State will determine whether the WPC Pilot requirements approved in the WPC Application have been met. If the requirements for a deliverable have been fully met, the State will notify the WPC Pilot and provide funding in an amount equal to the amount agreed to in the WPC Pilot Application for that deliverable, less any amount already received from the mid-year report. If the required deliverables have been partially met, notification of such partial completion will be sent to the WPC Pilot entity, and the WPC Pilot entity will be given 14 days to respond and revise reports as appropriate. At the discretion of the State, an adjusted amount of proportional funding will be determined. The amount of such proportional payments shall reflect the activities or progress performed as documented in the annual report, less any amounts already received from the mid-year report.
  - iv. Within 30 days of the determination of the end of year payment due based on the annual report, the State will issue requests to the WPC Pilot for the necessary intergovernmental transfer amounts. The WPC Pilot entities will make intergovernmental transfer of funds to the State in the amount specified within 7 days of receiving the State's request. If the intergovernmental transfers are made within the requested timeframe, the payment will be paid within 14 days after the transfers are made.
  - v. The State may impose sanctions, including the recoupment of funds from the WPC Pilot, should it be determined that the WPC Pilot is out of compliance with its requirements as set for in the STCs and attachments, the agreement between the WPC Pilot and the State, and/or policy letters or guidance set forth by the State. In addition to the requirements accompanying recoupment described above, any recoupment imposed as a sanction shall only occur after technical assistance has been provided by the State and failure to comply with corrective action occurs by the WPC site. Prior to initiating any recoupment of WPC Pilot funds, the State shall provide the Lead Entity notice and an opportunity to comment regarding the identified area of non-compliance and the expected amount of recoupment, as appropriate. In the event of such recoupments, the State must return the associated IGT funds to the transferring entities within 14 calendar days of funds being recouped.

- vi. The State shall make the annual reports available to the public on its website.

## **II. WPC Evaluation**

The state will identify an independent entity to conduct a mid-point and final evaluation. The independent entity shall work with the State to draft an evaluation proposal for approval by CMS. The draft will be shared with WPC Pilot sites and the public for comment. The mid-point and final evaluations will meet standards of leading academic institutions and academic peer review, including standards for the evaluation design, conduct, interpretation, and reporting of findings. The purpose of the evaluations will be to understand the extent to which the WPC Pilot interventions:

- i. Improve coordination across participating entities including data and information sharing;
  - ii. Improve beneficiary health outcomes;
  - iii. Reduce avoidable utilization of emergency and inpatient services (ED, hospital and psychiatric inpatient);
  - iv. Increase access to social services;
  - v. Improve care coordination across participating entities; and
  - vi. Improve housing stability, if applicable.
- a. The mid-point evaluation will be due one year prior to the expiration of the demonstration and will include data from program years 1 (as applicable), 2, and (to the extent possible) 3. The final evaluation will be completed no later than six months following the expiration of the demonstration.
    - i. Using the data reported in the annual reports pursuant to Section I(b)(i) above, and other data requested from the WPC Pilot sites as specified by the State, the evaluations shall evaluate the extent to which the WPC Pilots individually and collectively accomplished the objectives described in STC 123 (Mid-Point and Final Evaluations) and STC 112 (WPC Strategies).
    - ii. Evaluators shall interview state staff, each WPC Pilot and participating entities (as appropriate), and other stakeholders, for purposes of conducting the evaluations.
  - b. Data collected for purposes of the evaluation shall not be used by the independent entity for purposes other than the evaluation of the objectives described in STC 123 (Mid-Point and Final Evaluations) and STC 112 (WPC Strategies).
  - c. The mid-point and final evaluations shall be made available to the public on the State's website.