

State Demonstrations Group

November 18, 2024

Stephen Smith Director of TennCare Tennessee Department of Finance and Administration 310 Great Circle Road Nashville, TN 37243

Dear Director Smith:

The Centers for Medicare & Medicaid Services (CMS) completed its review of the Interim Evaluation Report, which is required by the Special Terms and Conditions (STCs), specifically STC #93 "Interim Evaluation Reports" of Tennessee's section 1115 demonstration, "TennCare III" (Project No: 11- W-00369/4 and 21-W-00075/9), effective through December 31, 2030. This Interim Evaluation Report covers the period from January 2021 through December 2022. CMS determined that the Evaluation Report, submitted on February 23, 2024 and revised on September 22, 2024, is in alignment with the CMS-approved Evaluation Design and the requirements set forth in the STCs, and therefore, approves the state's Interim Evaluation Report.

Overall, the evaluation findings were mixed. Some utilization measures decreased during the implementation period of TennCare III (January 2021 – December 2022), likely in part due to the public health emergency (PHE), while other measures had no observable change, which could be explained by the long-standing nature of the demonstration. However, there were also some strong positive and statistically significant findings related to the demonstration, including improved health outcomes of the I/DD population, increases in the proportion of TennCare enrollees receiving care through the patient-centered medical home (PCMH) model, increases in the proportion of behavioral health and I/DD providers, and increases in access to HCBS services for the CHOICES and I/DD populations. CMS looks forward to receiving the following Interim Evaluation Reports and Summative Evaluation Reports over the next years of the demonstration to see how the demonstration improves healthcare access, quality of care, and health outcomes.

In accordance with STC #97 "Public Access", the approved Interim Evaluation Report may now be posted to the state's Medicaid website within 30 days. CMS will also post the Interim Evaluation Report on Medicaid.gov.

We look forward to our continued partnership on the TennCare III section 1115 demonstration. If you have any questions, please contact your CMS demonstration team.

Page 2 – Stephen Smith

Sincerely,



Danielle Daly Director Division of Demonstration Monitoring and Evaluation

cc: Tandra Hodges, State Monitoring Lead, CMS Medicaid and CHIP Operations Group



Tennessee's Section 1115 TennCare III Demonstration Evaluation

Interim Evaluation Report

Project No. 11-W-00369/4

Prepared by Guidehouse

Updated August 1, 2024

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A. Executive Summary

The Centers for Medicare & Medicaid Services (CMS) approved Tennessee's Section 1115 demonstration project, TennCare III, for ten years, beginning on January 8, 2021. TennCare provides coverage to over 1.7 million Tennesseans through its managed care system. TennCare III built on many of the policies established in previous iterations of the demonstration and incorporated additional policies. The managed care system, CHOICES program, Employment and Community First (ECF) CHOICES program, Katie Beckett/Medicaid Diversion program, and retroactive eligibility waiver all continued from TennCare II to TennCare III. New policies included Designated State Investment Programs (DSIPs), Fraud Penalties, and Integration of Services for Individuals with Intellectual Disabilities. Tennessee selected Guidehouse to conduct an independent evaluation of the TennCare III demonstration. This document serves as the first interim evaluation report for the ten-year demonstration period. The independent evaluator examined data from January 2017 through December 2020 (pre-implementation of TennCare III) and January 2021 through December 2022 (post-implementation of TennCare III).

1. Summary of the Goals of the Demonstration

Tennessee outlined five primary goals for the TennCare III demonstration, as follows:

- 1. Provide high-quality care to enrollees that will improve health outcomes,
- 2. Ensure enrollee access to health care, including safety net providers,
- 3. Ensure enrollees' satisfaction with services,
- 4. Provide enrollees with appropriate and cost-effective Home and Community-Based Services (HCBS) within acceptable budgetary parameters, and
- 5. Manage expenditures at a stable and predictable level, and at a cost that does not exceed what would have been spent in a Medicaid fee-for-service program.

2. Summary of Evaluation Methodology

The independent evaluator used a mixed-methods approach to track the quality of care, health outcomes, access to care, enrollee satisfaction, and cost-effectiveness of the TennCare program. The target population for this analysis is all beneficiaries covered by TennCare, or where applicable, the TennCare member subgroup specific to the research question, such as CHOICES, Programs for Individuals with an Intellectual or Developmental Disability (I/DD), and Katie Beckett/Medicaid Diversion. The evaluation included a wide range of data sources, such as national surveys and national claims databases, Tennessee-specific surveys, and Tennessee claims, administrative, and enrollment data. The independent evaluator also crafted and distributed online surveys, as well as facilitated key-informant interviews. The independent evaluator applied these data sources using multiple analytic methods, including difference-in-differences, interrupted time series, comparison of means, pretest-posttest, and descriptive and qualitative analysis.

Beginning in March 2020, the COVID-19 Public Health Emergency spurred significant changes in health care service delivery and utilization, as well as prevented standard data collection for measures such as the National Core Indicators, among others. To account for gaps in data due to the COVID-19 Public Health

Emergency, the independent evaluator removed CYs 2020 and 2021 from the baseline and intervention evaluation periods when it was inappropriate or impossible to account for the effects of the COVID-19 pandemic. Some research questions were excluded from this interim evaluation report entirely due to a lack of data but will be addressed in future reports.

3. Interim Evaluation Observations

Figure 1 below lists the five goals of the TennCare III demonstration, summarizing overall conclusions and highlighting specific findings of note.

Goal	Observations
1. Provide high-quality	Key Finding: TennCare III maintained the delivery of high-quality physical and mental health
care to enrollees that	care as established in previous iterations of the program. There were no statistically
will improve health	significant results for any research questions related to Goal 1.
outcomes	
	Since the implementation of TennCare III, TennCare enrollees had better controlled blood
	pressure and HbA1c levels compared to national averages during the demonstration
	period, and CHOICES enrollees also reported better management of chronic conditions.
	Utilization of EPSDT services, management of behavioral health conditions, and access to
	medication-assisted treatment through the BESMART Program all maintained or improved
	since the implementation of TennCare III.
	The independent evaluator could not draw conclusions related to utilization of preventive
	services or impact on Neonatal Abstinence Syndrome live birth rates. Opioid-use rates and
	opioid-use disorder rates decreased before and after the implementation of TennCare III, but the lack of comparison data does not allow the independent evaluator to conclude that
	TennCare III caused this result.
2. Ensure enrollee	Key Finding: The implementation of TennCare III did not have a significant impact on levels
access to health care,	of utilization for preventive services and mental health care established prior to the
including safety net	demonstration. There was a statistically significant increase in number of enrollees in
providers	Patient Centered Medical Homes (PCMHs) and in population to behavioral health provider
P	ratio.
	Since the implementation of TennCare III, Tennessee has made several policy changes
	intended to increase access to care through the TennCare demonstration. These include
	expanding the scope of Medicaid coverage for pregnant and postpartum women in
	Tennessee, implementing an adult dental benefit, and increasing enrollment in HCBS.
	Since the implementation of TennCare III, the proportion of TennCare enrollees receiving
	care through the PCMH model increased significantly, as did the number of behavioral
	health and I/DD providers relative to the population. Managed Care Organizations (MCOs)
	played a key role in ensuring enrollee access to health care and services for non-medical
	needs; the MCOs developed relationships with Community-Based Organizations (CBOs) to
	implement structured screening processes in provider offices, foster connections to

Figure 1: Interim Evaluation Observations by Goal

 resources in communities, and follow up with enrollees about whether their needs w met. Adult enrollee utilization of preventive services, inpatient visits, and mental health vi and children and adolescent utilization of dental services all maintained rates similar those prior to the implementation of TennCare III, indicating consistent access. Additionally, TennCare III generally did not significantly impact engagement in prenat care. However, the independent evaluator did observe an increase in the percentage births associated with a postpartum visit. Dental care for pregnant TennCare enrollee added as a benefit in April 2022, and subsequently for all adults in January 2023, and evaluated further in later evaluation reports. Ensure enrollees' satisfaction with services Both overall beneficiary satisfaction and satisfaction among CHOICES enrollees (surve the National Core Indicators – Aging and Disabilities survey) have remained similar be and during the demonstration period. Provide enrollees with appropriate and cost-effective Home and Community-Based Services (HCBS) within 	sits, to al of es was will be
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Services (HCBS) within increased.	
acceptable budgetary	
parameters The number and percent of CHOICES enrollees actively receiving HCBS and the ratio of	of
HCBS to nursing facility cost per CHOICES enrollee both remained consistent since the	
implementation of TennCare III. The percentage of enrollees who met a nursing facili	
level care and accessed HCBS for 90+ days increased significantly post-implementation	
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From a budgetary perspective, the average long-term services and supports costs per	
CHOICES enrollee and per individual with I/DD increased since the implementation or	
TennCare III. This may in part be a reflection of activities undertaken by the State to	
enhance, expand, and strengthen HCBS under Section 9817 of the American Rescue I	'lan
Act during the period covered by the demonstration.	
5. Manage Key Finding: TennCare maintained an expenditure growth rate that is slower than the	2
expenditures at a average national Medicaid expenditure growth rate between FY 2020-FY2022. Expen	
stable and predictable on TennCare III were highest in FY2020 (\$11.5B), but similar to FY2021 (\$11.1B) and I	
level, and at a cost that 2022 (\$11.3B).	
does not exceed what	
would have been spent	
in a Medicaid fee-for-	
service program	

B. General Background Information

This is the Independent Evaluation Interim Report for Tennessee's Section 1115 demonstration project, TennCare III (Project Number 11-W-00369/4), approved by CMS on January 8, 2021. This Independent Evaluation Interim Report examines demonstration activities from January 8, 2021, through December 31, 2022, with qualitative data collection (i.e., interviews with managed care organizations and Enrollee Surveys) occurring in 2023. The purpose of the demonstration is to test and evaluate innovative solutions to improve health outcomes through high-quality and accessible care while maintaining expenditures at a predictable level. This also includes ensuring enrollees' access to care, including safety net providers, and satisfaction with services.

TennCare, which began in January of 1994, is one of the longest-running Medicaid demonstrations in the nation. The original TennCare demonstration created the first Medicaid managed care program in Tennessee. The original TennCare demonstration employed managed care organizations (MCOs) and extended coverage to many previously uninsured individuals.

TennCare II, which revised the existing TennCare demonstration and divided program populations into "TennCare Medicaid" (for enrollees who are Medicaid-eligible under Tennessee's Title XIX State Plan) and "TennCare Standard" (for enrollees who are Medicaid-eligible through the demonstration's expenditure authorities), was first implemented in July 2002. Over time, the TennCare demonstration has been revised to integrate more components of the Medicaid program into managed care.

The current TennCare III demonstration, which began on January 8, 2021, subsumes TennCare II and continues many of the existing TennCare II authorities, as well as new flexibilities. TennCare provides Medicaid health insurance coverage to approximately 1.7 million Tennesseans, equivalent to about 23% of the State's population. The majority of TennCare III demonstration policies pre-date its approval and are a continuation of TennCare II components. The managed care system, CHOICES program, Employment and Community First (ECF) CHOICES program, Katie Beckett/Medicaid Diversion program, and retroactive eligibility waiver were all implemented in prior demonstration periods and continue under TennCare III.

To comply with CMS requirements, TennCare selected Guidehouse to conduct an independent evaluation of the TennCare III demonstration. The evaluation uses quasi-experimental study designs to assess how TennCare met its programmatic goals.

Limitations

The information contained in this document, including any attachments and appendices, has been prepared by Guidehouse Inc. for the sole use and benefit of, and pursuant to a client relationship exclusively with the Division of TennCare. It is our understanding that the information contained in this document may be utilized in a public document. To the extent that the information contained in the document is provided to third parties, the document should be distributed in its entirety. Any user of this report must possess a certain level of familiarity with Medicaid programs in general and TennCare, specifically, to avoid misinterpretations of the report's contents. Accordingly, Guidehouse disclaims any contractual or other responsibility to others based

on their access to or use of the deliverable. The work presented in this deliverable represents Guidehouse's professional judgment based on the information available at the time this report was prepared.

1. Demonstration Goals

The TennCare III demonstration, like prior iterations of the TennCare demonstration, seeks to address the issue of providing enrollees with high-quality, accessible care while balancing cost-effectiveness and managing expenditures at a sustainable and predictable level. Further, TennCare III also aims to address the administrative barriers that can be associated with implementing changes in a Medicaid program in a timely manner. With the new demonstration, Tennessee was granted greater autonomy over the TennCare program, including increasing coverage and benefits without additional CMS approval, which allows for more timely updates to the program. TennCare's primary goals remain consistent with past demonstrations and are as follows:

- 1. Provide high-quality care to enrollees that will improve health outcomes,
- 2. Ensure enrollee access to health care, including safety net providers,
- 3. Ensure enrollees' satisfaction with services,
- 4. Provide enrollees with appropriate and cost-effective Home and Community-Based Services (HCBS) within acceptable budgetary parameters, and
- 5. Manage expenditures at a stable and predictable level, and at a cost that does not exceed what would have been spent in a Medicaid fee-for-service program.

Demonstration goals address objectives of the Section 1115(a) demonstrations, including health care accessibility, improved health outcomes, and cost-effectiveness.

2. Description of the Demonstration and Implementation Plan

TennCare, which began in January of 1994, is one of the longest-running Medicaid demonstrations in the nation. The original TennCare demonstration created the first Medicaid managed care program in Tennessee. The original TennCare demonstration employed managed care organizations (MCOs) and extended coverage to many previously uninsured individuals.

TennCare II, which revised the existing TennCare demonstration and divided program populations into "TennCare Medicaid" (for enrollees who are Medicaid-eligible under Tennessee's Title XIX State Plan) and "TennCare Standard" (for enrollees who are Medicaid-eligible through the demonstration's expenditure authorities), was first implemented in July 2002. Over time, the TennCare demonstration has been revised to integrate more components of the Medicaid program into managed care.

The current TennCare III demonstration, which began on January 8, 2021, subsumes TennCare II and continues many of the existing TennCare II authorities, as well as new flexibilities. Because in many cases, TennCare III represents a continuation of policies that were already in effect prior to January 2021, rather than new interventions, the TennCare III evaluation design largely focuses on whether the current TennCare III demonstration has maintained or continued progress on key indicators. Where new policies have begun

under TennCare III, the evaluation design seeks to assess the impact of those discrete policy changes to the extent possible.

Continuing Policies

The majority of TennCare III demonstration policies pre-date its approval and are a continuation of TennCare II components. The managed care system, CHOICES program, Employment and Community First (ECF) CHOICES program, Katie Beckett/Medicaid Diversion program, and retroactive eligibility waiver were all implemented in prior demonstration periods and will continue under TennCare III. This subsection further describes select key, continuing policies continuing under TennCare III.

CHOICES Program

The CHOICES managed long-term services and supports (MLTSS) program was first implemented in 2010 to provide older adults and adults with physical disabilities an integrated benefits package of long-term services and supports (LTSS), which includes both home and community-based services (HCBS) and nursing facility (NF) services. Under TennCare III, the State continues the CHOICES program for eligible individuals and, in doing so, maintains or expands access to HCBS for TennCare enrollees who are elderly or physically disabled.

ECF CHOICES Program

The ECF CHOICES program, implemented in 2016, expanded the use of managed care to provide HCBS to individuals who have an intellectual or developmental disability (I/DD). This program provides an integrated HCBS benefits package that includes integrated employment supports. The ECF CHOICES program continues under TennCare III, and the State prioritizes reducing the ECF CHOICES waitlist, increasing enrollee independence, and continuing to achieve individual employment goals for the I/DD population.

Katie Beckett/Medicaid Diversion Program

In November 2020, the State began implementing a Katie Beckett/Medicaid Diversion program for children with disabilities or complex needs whose parents' income or assets render the child ineligible for traditional Medicaid coverage. The State's program consists of two parts: Part A and Part B.

The Katie Beckett component of the program (Part A) targets children with the most severe needs, and provides a pathway to traditional Medicaid coverage, supplemented by a package of essential supportive services. The Medicaid Diversion component of the program (Part B) provides a targeted package of services and supports designed to prevent or delay the need for traditional Medicaid supports. Children in Katie Beckett (Part A) are subject to premiums, which are set on a sliding scale.

Retroactive Eligibility Waiver

TennCare's retroactive eligibility waiver enables the State not to extend eligibility to an enrollee prior to the date that an application for assistance is made. This waiver was first authorized by CMS in 1994 and continues under TennCare III; however, the waiver no longer applies to pregnant women and children who enroll in TennCare. Under TennCare III, these pregnant women and children receive retroactive coverage for medical costs incurred up to three months before the month of application.

Uncompensated Care Pools

TennCare authorizes the State to make uncompensated care payments to hospitals and other safety net providers. The demonstration includes two funds from which uncompensated care payments may be made, the "Virtual DSH" fund and the Uncompensated Care Fund for Charity Care. TennCare III gives the State certain flexibility to adjust the distribution methodology for uncompensated care payments.

New Policies Under TennCare III

Multiple policies and flexibilities were approved by CMS as part of the TennCare III demonstration. As a means of advancing the programmatic goals outlined in section 1 CMS has authorized the following:

- **Designated State Investment Programs (DSIPs).** Provides Tennessee with an opportunity to obtain shared savings.
- **Fraud Penalties.** Allows TennCare to temporarily suspend Medicaid eligibility for enrollees convicted of Medicaid fraud.
- Integration of Services for Individuals with Intellectual Disabilities. Integrates 1915(c) HCBS waiver services for individuals with intellectual disabilities and ICF/IID services into the larger managed care program.

Designated State Investment Programs (DSIPs)

The TennCare III demonstration gives Tennessee the opportunity to share in savings each year if the State underspends the budget neutrality cap specified in the demonstration's special terms and conditions. The shared savings component of the demonstration creates potential opportunities for the State to make key investments in the Medicaid program and the health of Medicaid beneficiaries.

Fraud Penalties

TennCare has the authority to suspend, for up to 12 months, Medicaid eligibility for individuals who have been convicted of Medicaid fraud. At this time, Tennessee has not implemented any new policies relative to suspending individuals convicted of fraud.

Integration of Services for Individuals with Intellectual Disabilities

Prior to the implementation of ECF CHOICES in 2016, the State provided HCBS to individuals with intellectual disabilities through a set of 1915(c) HCBS waivers. Individuals who were enrolled in one of these 1915(c) waivers prior to 2016 may elect to continue to receive their HCBS through these 1915(c) waivers rather than ECF CHOICES. While ECF CHOICES is fully integrated into the demonstration's larger managed care program, HCBS delivered through the 1915(c) waivers currently sit outside the managed care program. The State plans to integrate all Medicaid services for individuals with intellectual disabilities into the TennCare managed care program. Although this policy was not part of the TennCare III demonstration as approved in January 2021, the State subsequently submitted a demonstration amendment to CMS to make this policy change. In anticipation that this demonstration amendment would be approved, the policy is addressed in the evaluation design submitted by the State to CMS. However, at this time, the State is still awaiting CMS action on this demonstration amendment.

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3. Impacts of COVID-19 Public Health Emergency

Beginning in March 2020, the COVID-19 Public Health Emergency spurred significant changes in health care service delivery and utilization. The public health emergency altered Medicaid enrollment levels, program expenditures, enrollee satisfaction, service utilization, and access to care. The COVID-19 pandemic also prevented standard data collection for multiple measures, including the National Core Indicators (NCI) and the National Core Indicators – Aging and Disabilities (NCI-AD) Surveys, which involve in-person interviews. Since in-person interviews were infeasible in CY 2020-2021, NCI and NCI-AD data were not collected for this time period.

To account for gaps in data due to the COVID-19 Public Health Emergency, the independent evaluator removed CYs 2020 and 2021 from the baseline and intervention evaluation periods when it was inappropriate or impossible to account for the effects of the COVID-19 pandemic. The independent evaluator carefully analyzed any data from CYs 2020 and 2022 and supplemented with data from additional pre-COVID-19 or post-COVID-19 years. Utilization data from these years was particularly scrutinized and/or avoided due to COVID-19 pandemic-related impacts. In cases calling for interrupted time series analysis, the independent evaluator used a multiple-intervention technique to capture effects of both the COVID-19 pandemic and TennCare III. For difference-in-differences analyses with more than two observations available, year-fixed effects were added to capture time-varying effects, including the COVID-19 pandemic. For most pretest-posttest cases, the independent evaluator excluded 2020 and 2021 data from both the baseline and intervention groups.

As this evaluation focused on the impact of the demonstration on total computable costs (i.e., both federal and state share of expenses) overall, as well as total PMPM expenditures, the enhanced Federal Medical Assistance Percentages (FMAP) available through the Families First Coronavirus Response Act (FFCRA) and the American Rescue Plan (ARP) were out of the scope of the evaluation. The enhanced FMAP available through FFCRA did not directly impact total expenditures, merely the share to be assumed by the state and federal budgets. The enhanced FMAP available under Section 9817 of the ARP allowed for additional funding to enhance, expand, or strengthen Medicaid HCBS, although the specific investments undertaken by Tennessee under Section 9817 were not the focus of this evaluation.

4. Population Groups Impacted by the Demonstration

The target population for this analysis was all beneficiaries covered by TennCare, or where applicable, the TennCare member subgroup specific to the research question, such as Katie Beckett Program enrollees and enrollees in CHOICES or ECF CHOICES. Target populations are further outlined in **Section D.5**.

TennCare Enrollment Over Time

The independent evaluator used preexisting data to determine enrollment numbers from 2018-2022. Enrollment was defined as the total number of unique enrollees who appeared in TennCare's claims data during a given year. **Figure 2** below shows enrollment trends from 2018-2022.

Figure 2: Total Enrollment Over Time

Enrollment Year					
	2018	2019	2020	2021	2022
Total Enrollees	1,723,682	1,644,796	1,682,442	1,762,925	1,846,965
Percent Change	-	-4.58%	+2.29%	+4.78%	+4.77%

TennCare Enrollee Sociodemographic

Demographics: Sex

Figure 3 shows the proportion of females and males across all TennCare, TennCare CHOICES, TennCare ECF CHOICES, and TennCare Non-CHOICES enrollees from 2018-2022. Women make up a majority of all TennCare enrollees as well as non-CHOICES TennCare enrollees, consistently around 58% across all years for both categories. Females make up 66% of CHOICES Only enrollees across all years. ECF CHOICES enrollees are predominantly male, around 62% across all years.

Figure 3: Sex Demographics¹

	Enrollment Year						
	2018 (n= 1,723,682)	2019 (n= 1,644,796)	2020 (n= 1,682,442)	2021 (n= 1,762,925)	2022 (n= 1,846,965)		
All TennCare	58% Female						
TennCare Excluding	58% Female						
CHOICES							
CHOICES Only	67% Female	66% Female	66% Female	65% Female	65% Female		
ECF CHOICES Only	38% Female						

Demographics: Age

Figure 4, **Figure 5**, **Figure 6**, and **Figure 7** display the breakdown of TennCare enrollees by age for All of TennCare, TennCare excluding CHOICES, CHOICES Only, and ECF Choices Only. Over two-thirds of TennCare enrollees fall either within the 0-13 or 21-44 age bracket. Roughly 40% of TennCare enrollees are ages 0-13, while only 5% of TennCare enrollees are over 65+. However, for CHOICES, an average of 71% of enrollees fell in the 65+ age group between 2018-2022.

Figure 4: Age, All TennCare²

			Enrollment Year		
	2018	2019	2020	2021	2022
	(n=1,723,682)	(n=1,644,796)	(n=1,682,442)	(n=1,762,925)	(n=1,846,965)
Age 0-13	41%	42%	41%	41%	40%
Age 14-20	15%	15%	15%	16%	16%

¹ Guidehouse analysis of TennCare Claims and Encounter Data

² Guidehouse analysis of TennCare Claims and Encounter Data

	Enrollment Year						
	2018 2019 2020 2021 2022						
	(n=1,723,682)	(n=1,644,796)	(n=1,682,442)	(n=1,762,925)	(n=1,846,965)		
Age 21-44	25%	24%	24%	25%	26%		
Age 45-64	11%	11%	11%	11%	11%		
Age 65+	5%	5%	5%	5%	5%		

Note: Rounding and minor age coding discrepancies cause some columns not to add up to 100%.

Figure 5: Age, TennCare Excluding CHOICES³

		Enrollment Year					
	2018 2019 2020 2021						
	(n=1,688,883)	(n=1,610,194)	(n=1,648,788)	(n=1,730,944)	(n=1,815,912)		
Age 0-13	42%	43%	42%	42%	40%		
Age 14-20	15%	15%	16%	16%	17%		
Age 21-44	25%	24%	25%	25%	26%		
Age 45-64	11%	11%	11%	11%	11%		
Age 65+	3%	3%	3%	3%	4%		

Note: Rounding and minor age coding discrepancies cause some columns not to add up to 100%.

Figure 6: Age, CHOICES Only⁴

	Enrollment Year						
	2018	2019	2020	2021	2022		
	(n=34,799)	(n=34,602)	(n=33,654)	(n=31,981)	(n=31,053)		
Age 0-13	0%	<1%	<1%	0%	0%		
Age 14-20	<1%	<1%	<1%	<1%	<1%		
Age 21-44	5%	6%	6%	7%	7%		
Age 45-64	22%	22%	22%	23%	24%		
Age 65+	73%	72%	72%	70%	69%		

Note: Rounding and minor age coding discrepancies cause some columns not to add up to 100%.

³ Guidehouse analysis of TennCare Claims and Encounter Data

⁴ Guidehouse analysis of TennCare Claims and Encounter Data

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Figure 7: Age, ECF CHOICES Only⁵

	Enrollment Year					
	2018 (n=2,544)	2019 (n=2,917)	2020 (n=3,391)	2021 (n=3,760)	2022 (n=5,039)	
Age 0-13	2%	2%	1%	2%	2%	
Age 14-20	26%	20%	18%	14%	16%	
Age 21-44	61%	65%	67%	70%	69%	
Age 45-64	10%	11%	12%	12%	11%	
Age 65+	1%	2%	2%	2%	2%	

Note: Rounding and minor age coding discrepancies cause some columns not to add up to 100%.

Demographics: Race

Figure 8, Figure 9, Figure 10, and Figure 11 display the breakdown of TennCare enrollees by race for All of TennCare, TennCare excluding CHOICES, CHOICES Only, and ECF Choices Only. Roughly 50% of TennCare enrollees are White Non-Hispanic, making up a majority of enrollees in both CHOICES and TennCare broadly. For CHOICES, the percentage of White Non-Hispanic is closer to two-thirds. About one in five TennCare enrollees is Black, and this proportion is consistent across TennCare, TennCare CHOICES, and TennCare Non-CHOICES.

Figure 8: Race, All TennCare⁶

		Enrollment Year						
	2018 (n=1,723,682)	2019 (n=1,644,796)	2020 (n=1,682,442)	2021 (n=1,762,925)	2022 (n=1,846,965)			
American Indian or Alaskan Native	<1%	<1%	<1%	<1%	<1%			
Asian or Pacific Islander	<1%	1%	1%	1%	1%			
Black	20%	22%	22%	21%	21%			
Hispanic	<1%	<1%	<1%	<1%	<1%			
Native Hawaiian	<1%	<1%	<1%	<1%	<1%			
White (Non- Hispanic)	45%	50%	50%	49%	49%			
Other	10%	11%	10%	9%	9%			
Not Provided	23%	15%	16%	18%	19%			

⁶ Guidehouse analysis of TennCare Claims and Encounter Data

⁵ Guidehouse analysis of TennCare Claims and Encounter Data

Figure 9: Race, TennCare Excluding CHOICES⁷

	Enrollment Year					
	2018	2019	2020	2021	2022	
	(n=1,688,883)	(n=1,610,194)	(n=1,648,788)	(n=1,730,944)	(n=1,815,912)	
American Indian or	<1%	<1%	<1%	<1%	<1%	
Alaskan Native	170	170	170	170	170	
Asian or Pacific	<1%	1%	1%	1%	1%	
Islander	~170	170	170	170	170	
Black	20%	22%	22%	21%	21%	
Hispanic	<1%	<1%	<1%	<1%	<1%	
Native Hawaiian	<1%	<1%	<1%	<1%	<1%	
White (Non-	45%	50%	50%	49%	49%	
Hispanic)	45%	50%	50%	49%	4970	
Other	10%	11%	10%	10%	9%	
Not Provided	24%	15%	17%	18%	19%	

Figure 10: Race, CHOICES Only⁸

	Enrollment Year				
	2018	2019	2020	2021	2022
	(n=34,799)	(n=34,602)	(n=33,654)	(n=31,981)	(n=31 <i>,</i> 053)
American Indian or	<1%	<1%	<1%	<1%	<1%
Alaskan Native	<170	<170	<170	<170	<170
Asian or Pacific	<1%	<1%	<1%	<1%	<1%
Islander	<170	<1%	<170	<1/0	<1/6
Black	21%	21%	21%	21%	22%
Hispanic	<1%	<1%	<1%	0%	0%
Native Hawaiian	0%	0%	<1%	0%	<1%
White (Non-	72%	69%	67%	66%	65%
Hispanic)	1270	0976	0778	00%	0576
Other	5%	6%	6%	6%	6%
Not Provided	2%	3%	6%	6%	7%

Figure 11: Race, ECF CHOICES Only⁹

	Enrollment Year					
	2018 2019 2020 2021 2					
	(n=2,544)	(n=2,917)	(n=3,391)	(n=3,760)	(n=5,039)	
American Indian or	<1%	<1%	<1%	<1%	<1%	
Alaskan Native	<170	~176	<170	~170	<170	

⁷ Guidehouse analysis of TennCare Claims and Encounter Data

⁸ Guidehouse analysis of TennCare Claims and Encounter Data

⁹ Guidehouse analysis of TennCare Claims and Encounter Data

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	Enrollment Year				
	2018 (n=2,544)	2019 (n=2,917)	2020 (n=3,391)	2021 (n=3,760)	2022 (n=5,039)
Asian or Pacific Islander	<1%	<1%	<1%	<1%	<1%
Black	9%	12%	13%	13%	13%
Hispanic	<1%	<1%	0%	0%	0%
Native Hawaiian	0%	0%	0%	0%	0%
White (Non- Hispanic)	42%	42%	41%	41%	41%
Other	42%	40%	38%	36%	33%
Not Provided	3%	4%	7%	9%	11%

Demographics: Geographic Residence

Figure 12 displays geographic residence data among TennCare enrollees between 2018-2022. Geographic residence remained consistent across all TennCare, CHOICES, and non-CHOICES populations throughout 2018-2022. Among all TennCare enrollees and non-CHOICES enrollees, 64% live in rural areas as of 2022. Seventy percent of CHOICES Only enrollees live in rural areas, compared to 63% of ECF CHOICES enrollees.

Figure 12: Geographic Residence Demographics¹⁰

		Enrollment Year					
	2018 (n= 1,723,682)						
All TennCare	65% Rural	64% Rural	64% Rural	64% Rural	64% Rural		
TennCare Excluding CHOICES	65% Rural	64% Rural	64% Rural	64% Rural	64% Rural		
CHOICES Only	70% Rural	70% Rural	70% Rural	70% Rural	70% Rural		
ECF CHOICES Only	62% Rural	61% Rural	62% Rural	63% Rural	63% Rural		

5. Evaluation Questions and Hypotheses

Figure 13 - **Figure 17** outline the hypotheses and research questions (RQs) related to each of the five demonstration goals. In addition, this section includes the TennCare III Driver Diagram and related Logic Models.

Note: Some of the research questions included in the Evaluation Design were omitted from this interim evaluation report, due to data access or because the questions were intended for future evaluation reports. *Figure 18* outlines the omitted research questions.

¹⁰ Guidehouse analysis of TennCare Claims and Encounter Data

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Goal 1: Provide high-quality care to enrollees that will improve health outcomes

Hypotheses	Research Questions	Applicable Figures
Hypothesis 1.1 –	Primary RQ 1.1.a: Has the implementation of TennCare III maintained	Figure 35-Figure 43
Following	or improved physical health outcomes for TennCare enrollees?	
implementation of	Drimony DO 1.1 by Use the implementation of TennCare III maintained	
the TennCare III demonstration,	Primary RQ 1.1.b: Has the implementation of TennCare III maintained or increased the utilization rates of preventive or wellness services for	
quality of care and	TennCare enrollees?	
health outcomes for		
TennCare enrollees	Primary RQ 1.1.c: Has the implementation of TennCare III maintained or	
will maintain or	increased the utilization rates of EPSDT services for TennCare enrollees?	
improve.		
improve.	Primary RQ 1.1.d: Has the implementation of TennCare III maintained	
	or improved the management of behavioral health (BH) conditions for	
	TennCare enrollees?	
Hypothesis 1.2 –	Primary RQ 1.2.a: Has the implementation of TennCare III maintained	Figure 44-Figure 47
Following	or decreased opioid misuse among TennCare enrollees (i.e., first-time,	
implementation of	acute, and chronic opioid users)?	
the TennCare III		
demonstration,	Primary RQ 1.2.b: Has the implementation of TennCare III maintained	
opioid misuse will	or decreased the number of Neonatal Abstinence Syndrome live births?	
maintain or		
decrease among	Primary RQ 1.2.c: Has the implementation of TennCare III maintained or	
TennCare enrollees,	improved the rate of opioid use disorder (OUD) treatment for TennCare	
access to	enrollees?	
medication-assisted		
treatment (MAT)	Primary RQ 1.2.d: Has the implementation of TennCare III maintained	
will maintain or	or improved access to MAT?	
increase, and health		
outcomes		
associated with		
opioid misuse will		
maintain or		
improve.		
Hypothesis 1.3 –	Primary RQ 1.3.a: Has the implementation of TennCare III maintained	Figure 48-Figure 60
Following	or improved quality outcomes for CHOICES enrollees?	
implementation of	Primary RQ 1.3.c: Has the implementation of TennCare III maintained or	
the TennCare III	improved quality outcomes for individuals with I/DD?	
demonstration,		
quality outcomes	Primary RQ 1.3.d: Has the implementation of TennCare III maintained	
and quality of life	or improved quality of life for individuals with I/DD?	

Figure 13: Goal 1 – Hypotheses and Research Questions

Hypotheses	Research Questions	Applicable Figures
for TennCare		
CHOICES enrollees		
and individuals with		
I/DD will maintain or		
improve.		

Goal 2: Ensure enrollee access to health care, including safety net providers

Hypotheses	Research Questions	Exhibits
Hypothesis 2.1 –	Primary RQ 2.1.a: Has the implementation of TennCare III maintained or	Figure 61-Figure 65
Following	improved enrollee utilization of services? ¹¹	
implementation of	Primary care visits	
the TennCare III	Inpatient visits	
demonstration,	BH visits	
enrollee utilization	Prescription drugs	
of services will		
maintain or	Subsidiary RQ 2.1.a.i: Has the implementation of TennCare III	
improve.	maintained or improved utilization of primary care?	
	Subsidiary RQ 2.1.a.ii: Has the implementation of TennCare III	
	maintained or improved utilization of inpatient care?	
	Subsidiary RQ 2.1.a.iii: Has the implementation of TennCare III	
	maintained or improved utilization of BH treatment?	
	Subsidiary RQ 2.1.a.iv: Has the implementation of TennCare III	
	maintained or improved utilization of outpatient prescription drugs?	
Hypothesis 2.2 –	Primary RQ 2.2.a: Has the implementation of TennCare III maintained or	Figure 66
Following	increased the number and proportion of TennCare enrollees cared for	
implementation of	through the PCMH model?	
the TennCare III		
demonstration,		
access to		
comprehensive		
primary care will		

Figure 14: Goal 2 – Hypotheses and Research Questions

¹¹ The independent evaluator will examine whether observed changes in service utilization measures suggest that the volume and mix of services utilized is shifting in the direction of lower cost types of care, when clinically appropriate (e.g., if increased primary care visits are observed, if there is an association between primary care visit rates and emergency department visit and inpatient visit rates). The independent evaluator will interpret the service utilization measures in the context of other measures in the Evaluation (e.g., health outcome measures).

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Hypotheses	Research Questions	Exhibits
maintain or		
increase.		
Hypothesis 2.3 –	Primary RQ 2.3.a: Has the implementation of TennCare III maintained or	Figure 67-Figure 71
Following	increased member engagement in prenatal care?	
implementation of		
the TennCare III	Primary RQ 2.3.b: Has the implementation of TennCare III maintained	
demonstration,	or increased member engagement in postpartum care?	
member		
engagement in		
prenatal and		
postpartum care		
will maintain or		
increase.		
Hypothesis 2.4 –	Primary RQ 2.4.a: What strategies did the MCOs implement to address	Figure 72-Figure 73
Following	non-medical needs affecting enrollees' health?	
implementation of		
the TennCare III		
demonstration,		
MCOs will		
encourage and/or		
facilitate the		
identification of		
non-medical needs		
affecting enrollees'		
health and the		
referral of enrollees		
to resources.		
Hypothesis 2.5 –	Primary RQ 2.5.a: Has participant engagement in dental services for	Figure 74-Figure 77
Following	TennCare children and adolescents maintained or increased following	
implementation of	implementation of TennCare III?	
the TennCare III		
demonstration,	Primary RQ 2.5.b: Has participant engagement in dental services for	
participant	pregnant TennCare enrollees maintained or increased following	
engagement in	implementation of TennCare III?	
dental services for		
eligible TennCare III		
enrollees will		
maintain or		
increase.		
Hypothesis 2.6 –	Primary RQ 2.6.a: What benefits did TennCare enrollees receive that	N/A
Under TennCare III,	were in excess of the benefits authorized under the Medicaid State Plan	
enrollees will	following implementation of TennCare III?	
receive Medicaid		

Hypotheses	Research Questions	Exhibits
benefits in excess of		
those available		
under the Medicaid		
State Plan.		
Hypothesis 2.7 –	Primary RQ 2.7.b: Do Tennesseans have access to BH and I/DD provider	Figure 78-Figure 79
DSIPs will continue	and service delivery networks?	
to provide		
important services		
to Tennesseans.		
Hypothesis 2.9 –	Primary RQ 2.9.a: Do Medicaid eligible individuals in Tennessee subject	Figure 80-Figure 89
The retroactive	to the retroactive eligibility waiver enroll in Medicaid at the same rates	
eligibility waiver will	as eligible individuals in other states who have access to retroactive	
not significantly	eligibility?	
impact likelihood of		
enrollment, health	Primary RQ 2.9.c: Do the health outcomes of enrollees subject to the	
status of enrollees,	retroactive eligibility waiver differ from those of enrollees in other	
or have an adverse	states who have access to retroactive eligibility?	
financial impact.		
	Primary RQ 2.9.d: What are common barriers to timely renewal for	
	enrollees subject to the retroactive eligibility waiver?	

Goal 3: Ensure enrollees' satisfaction with services

Figure 15: Goal 3 – Hypotheses and Research Questions

Hypotheses	Research Questions	Exhibits
Hypothesis 3.1 –	Primary RQ 3.1.a: Has the implementation of TennCare III maintained	Figure 90-Figure 91
Following	or improved TennCare enrollee satisfaction with overall health care?	
implementation of		
the TennCare III	Primary RQ 3.1.b: Has the implementation of TennCare III maintained	
demonstration,	or improved CHOICES enrollee satisfaction?	
TennCare enrollee		
satisfaction with		
health care services		
will maintain or		
improve.		

Goal 4: Provide enrollees with appropriate and cost-effective Home and Community-Based Services (HCBS) within acceptable budgetary parameters

Hypotheses	Research Questions	Exhibits
Hypothesis 4.1 –	Primary RQ 4.1.a: Has the implementation of TennCare III maintained	Figure 92-Figure 97
Following	or increased the number and percentage of CHOICES enrollees actively	
implementation of	receiving HCBS?	
the TennCare III demonstration, the	Primary RQ 4.1.b: Has the implementation of TennCare III maintained	
proportion of	or increased the ratio of HCBS to NF service costs for CHOICES	
individuals who	enrollees?	
receive HCBS rather		
than NF care will	Primary RQ 4.1.c: Has the implementation of TennCare III maintained or	
maintain or	decreased the average LTSS costs per CHOICES enrollee? ¹²	
increase.		
	Primary RQ 4.1.d: Has the implementation of TennCare III maintained	
	or increased the number and percentage of individuals with I/DD	
	actively receiving HCBS?	
	Primary RQ 4.1.e: Has the implementation of TennCare III maintained or increased the ratio of HCBS to ICF/IID service costs for individuals	
	with I/DD?	
	Primary RQ 4.1.f: Has implementation of the TennCare III	
	demonstration maintained or decreased the average LTSS costs per	
	individual with I/DD?	
	Primary RQ 4.1.g: Has the implementation of TennCare III maintained or	
	increased the level of institutional transition and diversion for CHOICES	
	enrollees?	
Hypothesis 4.2 –	Primary RQ 4.2.a: Has the implementation of TennCare III maintained	Figure 98
Following	or increased the number of individuals with I/DD that participate in	
implementation of	integrated employment and earn at or above the minimum wage?	
the TennCare III		
demonstration,		
participation levels		
in integrated employment for		
individuals with		
I/DD will maintain		
, <u></u>		

Figure 16: Goal 4 – Hypotheses and Research Questions

¹² The independent evaluator will consider impacts of the COVID-19 pandemic, including potential increases in NF payments.

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Hypotheses	Research Questions	Exhibits
or increase.		
Hypothesis 4.5 –	Primary RQ 4.5.d: What is the health insurance status and reported	N/A
Following	change in health status among Katie Beckett Part A enrollees that were:	
implementation of	 Suspended from the program due to non-payment of 	
the TennCare III	premiums; or	
demonstration,	 Voluntarily separated from the program? 	
premium		
requirements for	Primary RQ 4.5.d.i: What is the health insurance status and reported	
participants in Part	change in health status among Katie Beckett Part A enrollees that were	
A of the Katie	suspended from the program due to non-payment of premiums?	
Beckett program		
will not reduce the	Primary RQ 4.5.d.ii: What is the health insurance status and reported	
likelihood of	change in health status among Katie Beckett Part A enrollees that	
enrollment or	voluntarily separated from the program?	
enrollment		
continuity among		
participants.		

Goal 5: Manage expenditures at a stable and predictable level, and at a cost that does not exceed what would have been spent in a Medicaid fee-for-service program

Hypotheses	Research Questions	Exhibits
Hypothesis 5.1 –	Primary RQ 5.1.a: Has TennCare maintained an expenditure growth	Figure 99-Figure 101
Following	rate that is slower than the average national Medicaid expenditure	
implementation of	growth rate? ¹³	
the TennCare III		
demonstration,	Primary RQ 5.1.b: What is the difference between TennCare III's	
TennCare	aggregated costs and the budget neutrality cap, and how does this	
expenditures will	change over the duration of the demonstration period?	
grow at a slower		
and more	Primary RQ 5.1.c: What are the administrative operational costs of the	
sustainable rate	demonstration?	
than the average		
national Medicaid		
expenditures.		

¹³ The independent evaluator will consider impacts of the American Rescue Plan, including enhanced Federal Medical Assistance Percentages (FMAP) funds.

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6. Research Questions Not Included in the Interim Report

Figure 18 outlines the research questions that were omitted from the interim report and the reason for exclusion for each.

Research Questions	Reason for Exclusion
Drimony PO 1.2 by Hos the implementation of TeanCase III maintained as impressed sustitu	Data upavailable
Primary RQ 1.3.b: Has the implementation of TennCare III maintained or improved quality of life for CHOICES enrollees?	Data unavailable – outcome measures no
of the for Choices enrollees?	
	longer in NCI-AD survey;
	updated evaluation
	design with alternative
	measures for future
	evaluation reports
Primary RQ 1.4.a: Has enrollment in the Katie Beckett program maintained or improved quality of life for eligible children?	Applies to future reports
Primary RQ 1.4.b: Has enrollment in the Katie Beckett program maintained or improved health and family outcomes for eligible children?	Applies to future reports
Primary RQ 2.4.b: Has the percentage of enrollees screened for non-medical needs	Applies to future reports
affecting enrollees' health increased following the implementation of TennCare III?	
Primary RQ 2.4.c: Has the percentage of enrollees referred to resources to address non-	Applies to future reports
medical needs affecting enrollees' health increased following the implementation of TennCare III?	
Primary RQ 2.7.a: How many individuals receive services through each DSIP?	Data unavailable –
	Tennessee has not
	historically tracked data
	in this manner.
	Tennessee is replacing
	this RQ with new RQs
	that better evaluate the
	impact of the intent of
	the DSIP program.
Primary RQ 2.8.a: Have TennCare's UC pools maintained or increased access to care for	Data unavailable –
TennCare enrollees served by eligible safety net providers?	Tennessee has not
, , , , , , , , , , , , , , , , , , , ,	historically tracked data
	in this manner and is
	developing the
	infrastructure to report
	this data in future

Figure 18: Research Questions Excluded from Interim Report

Research Questions	Reason for Exclusion
	evaluation reports
Primary RQ 2.8.b: How has the implementation of TennCare III impacted UC costs?	Applies to future reports
Primary RQ 2.9.b: Does the retroactive eligibility waiver significantly impact likelihood of enrollment continuity for enrollees?	Applies to future reports
Primary RQ 2.10.a : Has the implementation of TennCare III (and resulting extension of TennCare coverage to children adopted from state custody) increased the number and percentage of children adopted from state custody?	N/A ¹⁴
Primary RQ 3.1.c: Has the implementation of TennCare III maintained or improved satisfaction of individuals with I/DD?	Data unavailable – NCI- IDD surveys not conducted since start of TennCare III due to the public health emergency
Primary RQ 3.1.d: Are parents of children enrolled in the Katie Beckett program satisfied with the services received from TennCare?	Applies to future reports
Primary RQ 4.3.a: Has the integration of existing HCBS waivers into managed care maintained or improved independence for individuals with intellectual disabilities?	Applies to future reports
Primary RQ 4.3.b: Has the integration of existing HCBS waivers into managed care maintained or improved coordination of services for individuals with intellectual disabilities?	Applies to future reports
Primary RQ 4.4.a: Has enrollment in the Katie Beckett program maintained or improved access to care for eligible children?	Applies to future reports
Primary RQ 4.5.a: How many and what percentage of children approved for Part A of the Katie Beckett program do not enroll due to non-payment of the premium?	Data unavailable – counts too small to report; will be assessed for future evaluation years using eligibility and enrollment data
Primary RQ 4.5.b: How many and what percentage of Katie Beckett Part A program enrollees are suspended from the program due to non-payment of premiums?	Data unavailable – counts too small to report; will be assessed for future evaluation years using

¹⁴ This research question was included in the evaluation design to address the impact of a proposed demonstration amendment that CMS has not yet approved.

Research Questions	Reason for Exclusion
	eligibility and enrollment data
Primary RQ 4.5.c: How many and what percentage of Katie Beckett Part A program enrollees voluntarily separate from the program?	Data unavailable – counts too small to report; will be assessed for future evaluation years using eligibility and enrollment data
Subsidiary RQ 4.5.c.i: Among Katie Beckett Part A program enrollees who voluntarily separate from the program, to what extent is this voluntary separation associated with the premium requirements?	Data unavailable – sample sizes too small to report; will be assessed for future evaluation years using focus groups
Primary RQ 4.6.a: Has the implementation of Part B of the Katie Beckett program delayed and/or diverted eligible children from enrolling in TennCare?	Data unavailable – counts too small to report; will be assessed for future evaluation years using eligibility and enrollment data
Primary RQ 5.2.a: Has the implementation of TennCare's authority to suspend Medicaid eligibility for individuals convicted of Medicaid fraud maintained or decreased the number of enrollees who have been convicted of Medicaid fraud in State or Local courts?	N/A. At this time, Tennessee has not implemented this authority.
Primary RQ 5.2.b: What is the reported health insurance status among individuals who are suspended from TennCare due to a Medicaid fraud conviction?	N/A. At this time, Tennessee has not implemented this authority.

7. TennCare III Driver Diagram

The TennCare III Driver Diagram, illustrated in **Figure 19**, establishes a visual relationship between TennCare's five programmatic goals (aims), the primary drivers that advance those goals, and the secondary drivers fundamental to support the primary drivers.

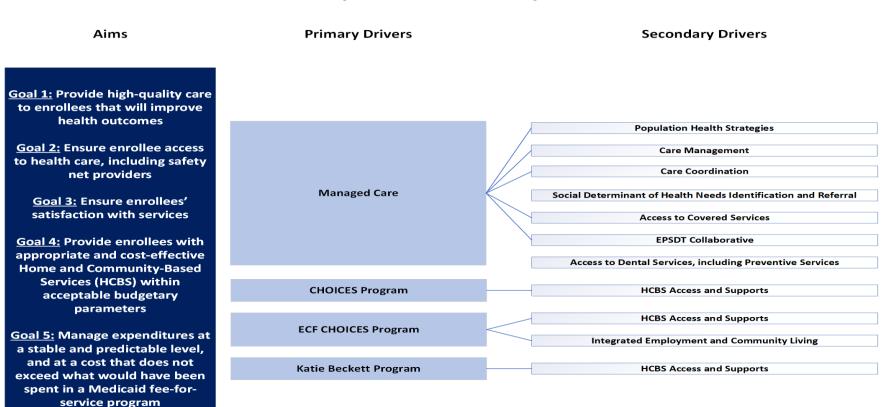


Figure 19: TennCare III Driver Diagram

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8. TennCare III Logic Models

TennCare III Logic Models, included in **Figure 20** and **Figure 21**, focus on the new, key policies and flexibilities approved as part of the TennCare III demonstration: DSIP savings opportunities, and suspension of eligibility for State or Local Medicaid fraud conviction.

Logic Models are not provided for policies that have been in effect since before the approval of TennCare III (e.g., broader managed care programs, CHOICES program, I/DD programs, Katie Beckett/Medicaid Diversion Program).

For each Logic Model, research questions associated with the outcomes, moderating factors, and/or confounding factors are included in parentheses.

The Logic Model in Figure 20 illustrates the expected short-term, intermediate, and long-term outcomes for implementation of the DSIP savings opportunities.

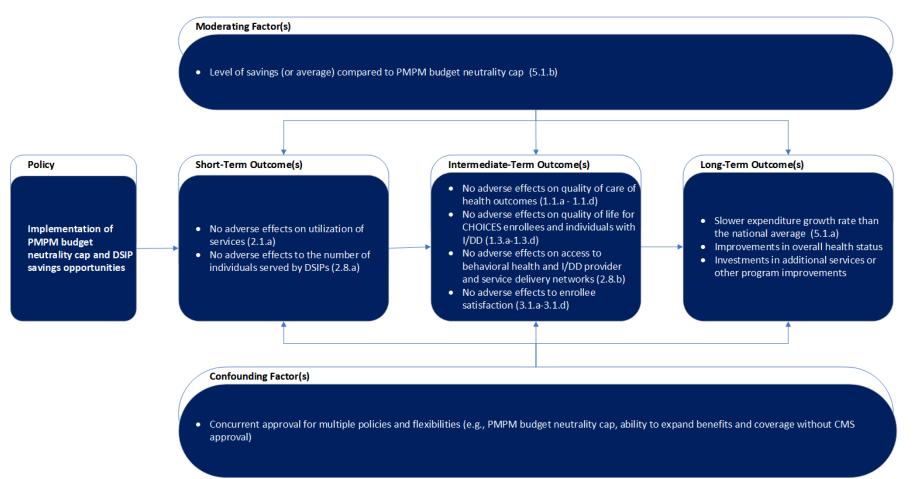


Figure 20: Logic Model – Implementation of DSIP Savings Opportunities

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The Logic Model in **Figure 21** illustrates the expected short-term, intermediate, and long-term outcomes for the suspension of eligibility for State or Local Medicaid fraud convictions.

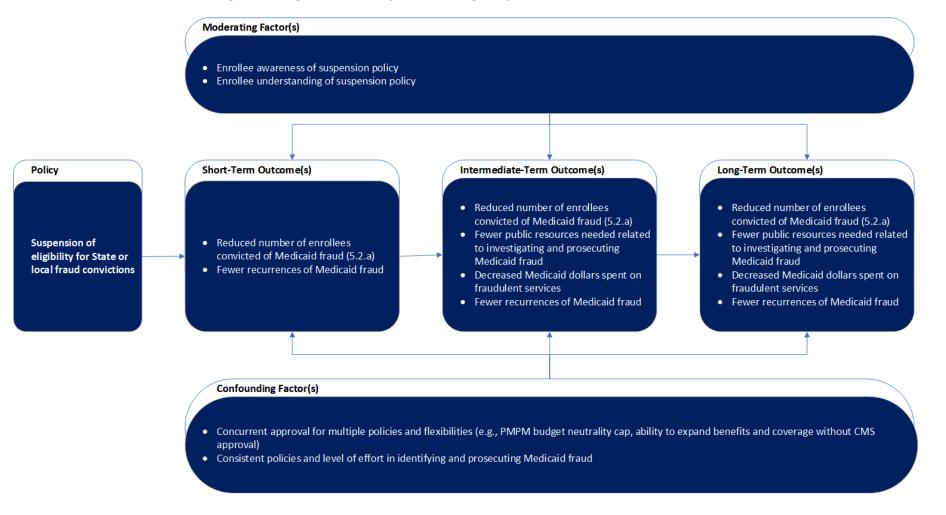


Figure 21: Logic Model – Suspension of Eligibility for State or Local Medicaid Fraud Convictions

C. Methodology

The TennCare III Evaluation Design, submitted to CMS on September 9, 2022¹⁵, describes the analytic approach for the Interim and Summative Evaluation Reports. The Independent Evaluation Interim Report used a mixed-methods approach for qualitative and quantitative analysis to track the quality of care, health outcomes, access to care, enrollee satisfaction, and cost-effectiveness of the TennCare program.

Per the Evaluation Design, the independent evaluator planned to use T-MSIS data to address several of the research questions; however, due to a number of administrative challenges, the independent evaluator was unable to obtain access to T-MSIS data in the timeframe leading up to this report. As a result, many difference-in-differences analyses were not feasible, and the independent evaluator used interrupted time series and pretest-posttest analyses instead. The independent evaluator will re-assess the potential use of T-MSIS data in future evaluation cycles.

1. Data Sources

The independent evaluator compiled data for the independent evaluation interim report from a range of quantitative and qualitative data sources including national surveys, Tennessee-specific surveys, national claims databases, and State-level claims, administrative, and enrollment data. These data sources are described in further detail below.

Figure 22 outlines the data sources used to evaluate each demonstration goal. The "X" indicates the relevant data sources corresponding to each goal. A strikethrough indicates the independent evaluator planned to but did not use the data source in the evaluation, either because the data was not available or because it is intended to be used in future reports.

Data Source External Data Sources		Goal 1: Quality of Care and Health Outcomes	Goal 2: Access	Goal 3: Satisfaction	Goal 4: HCBS	Goal 5: Expenditures
1.	National Committee for Quality Assurance (NCQA) Healthcare Effectiveness Data and Information Set (HEDIS [®])	x	х			
2.	Transformed Medicaid Statistical Information System (T-MSIS) Data	×	×		¥	×

Figure 22: Data Sources by Demonstration Goal

¹⁵ In accordance with the special terms and conditions of the TennCare III demonstration, Tennessee submitted its proposed evaluation design for the demonstration to CMS on July 7, 2021. After receiving feedback from CMS, Tennessee submitted a revised evaluation design to CMS on September 9, 2022. The evaluation methodology used for this interim report reflects the revised evaluation design submitted in September 2022.

		Goal 1: Quality of Care and Health	Goal 2:	Goal 3:	Goal 4:	Goal 5:
	ta Source	Outcomes	Access	Satisfaction	HCBS	Expenditures
3.	National Core Indicators - Aging and Disability™ (NCI- AD) Survey	Х		Х		
4.	National Core Indicators (NCI) Survey	х		х	х	
5.	NCI Child Family Survey	Х		Х	Х	
6.	Integrated Public Use Microdata Series (IPUMS) American Community Surveys (ACS)		х			
7.	Behavioral Risk Factor Surveillance System (BRFSS)		Х			
8.	Medicaid Budget and Expenditure System (MBES)					х
Int	ernal Data Sources					
1.	Early and Periodic Screening, Diagnostic and Treatment (EPSDT) Data	Х				
2.	TennCare Claims and Encounter Data	х	х		х	х
3.	Pharmacy Claims Data	Х	Х			Х
4.	TennCare Dental Benefit Manager (DBM) Claims Data		х			
5.	CHOICES and I/DD Program Claims and Encounter Data				Х	
6.	Tennessee Department of Health Vital Statistics Records (2017-2030)	Х				
7.	TennCare Provider Enrollment Data	Х				
8.	State Administrative Data		Х			
9.	TennCare MCO Population Health Data		×			
10.	Tennessee Department of Health Safety Net Reports		х			
11.	Tennessee Uncompensated Care Data		Х			

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Data Source	Goal 1: Quality of Care and Health Outcomes	Goal 2: Access	Goal 3: Satisfaction	Goal 4: HCBS	Goal 5: Expenditures
12. TennCare Eligibility and Enrollment Data		х		х	
13. Beneficiary Satisfaction Survey of TennCare Recipients			х		
 TennCare Individual Employment Data Survey (EDS) 				х	
15. TennCare Expenditure Data					Х
16. State and Local Law Enforcement Agency Data					×
17. MCO Interviews		Х			
18. TennCare Enrollee Surveys and/or Focus Groups		х		х	
19. TennCare Medicaid Rules		Х			
20. TennCare Benefit Packages		х			

2. External Data Source Descriptions

For each of the national surveys, the independent evaluator consulted the survey's technical documentation to ensure effective use of the survey data, displayed in **Figure 23**.

Figure 23: External Data Sources

Data Type	Description			
National Committee for Quality	National data set that measures the quality of care received by Medicaid enrolle	ee.		
Assurance (NCQA) Healthcare	Provides annual national and regional standards that states can use to benchma	ark		
Effectiveness Data and	their performance on quality and health outcomes through its Quality Compass			
Information Set (HEDIS [®])	publication.			
National Core Indicators - Aging	Survey jointly administered by Advancing States, Human Services Research Instit	tute		
and Disability™ (NCI-AD) Survey	(HSRI), and participating states.			
	Tracks the performance of State Medicaid, aging, and disability agencies.			
National Core Indicators™ (NCI)	Survey collaboratively administered by the National Association of State Directo	ors		
Survey	of Developmental Disabilities Services (NASDDDS), HSRI, and participating states	s.		
	Tracks service planning, employment, community inclusion, and safety, but inste	ead		
	targets individuals with I/DD.			
National Core Indicators™ (NCI)	National Survey tool conducted by the same entities as NCI and NCI-AD, for the			
Child Family Survey	Katie Beckett program.			

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Data Type	Description
Integrated Public Use Microdata Series (IPUMS) American Community Surveys (ACS)	 National annual survey that provides key demographic, insurance, and other socioeconomic variables on the total U.S. population.
Behavioral Risk Factor Surveillance System (BRFSS)	 Nationwide annual survey that gathers large samples of data on health status, health risk behaviors, access to health care, and utilization of preventive health services.
Medicaid Budget and Expenditure System (MBES)	• Report generated every fiscal year by CMS that tracks budgeted and actual State expenditures for each fiscal period and actual expenditures for each quarter.

3. Internal Data Source Descriptions - Quantitative

The independent evaluator leveraged several internal data sources for quantitative analysis, displayed in Figure 24.

Data Type	Description
Early and Periodic Screening,	Database for child health screening services, corrective treatment referrals, and dental
Diagnostic and Treatment	services for TennCare enrollees.
(EPSDT) Data	
TennCare Claims and Encounter	Database of claims and encounter data for health care utilization patterns of TennCare
Data	enrollees.
Pharmacy Claims Data	Database of pharmacy claims data developed by OptumRx and TennCare.
Dental Benefit Manager (DBM)	Database developed in collaboration with DentaQuest, TennCare's DBM, for dental
Claims Data	claims data.
CHOICES and I/DD Program	Data hub for information on access to LTSS for CHOICES enrollees and individuals with
Claims and Encounter Data	I/DD, diversion rates from institutional to HCBS care, service costs associated with LTSS,
	and other measures.
Tennessee Department of Health	Database of vital statistics, including resident live births.
Vital Statistics Records	
TennCare Provider Enrollment	Data on Buprenorphine Enhanced Supportive Medication-Assisted Recovery and
Data	Treatment (BESMART) providers enrolled in MCO networks.
State Administrative Data	Data on individuals served by each DSIP, BH and I/DD provider to population ratios, and
	the number and percentage of children adopted from state custody.
Tennessee Department of Health	Annual report to the Tennessee General Assembly that includes data relating to access
Safety Net Reports	to care through safety net service providers.
TennCare Eligibility and	Data collected by TennCare on enrollees' access to care.
Enrollment Data	
Primary Care Medical Home	Data collected by TennCare on enrollees' access to comprehensive primary care
(PCMH) Data	services.

Figure 24: Internal Data Sources

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Data Type	Description
Beneficiary Satisfaction Survey	Surveys Tennessee residents to measure their insurance status, medical service
	utilization, and level of satisfaction with the TennCare program.
TennCare Individual	Annual survey on employment status for TennCare enrollees who receive LTSS.
Employment Data Survey (EDS)	

4. Internal Data Source Descriptions - Qualitative

Enrollee surveys and MCO interviews were conducted to gather qualitative data. This provided useful context for the quantitative analyses and enabled the independent evaluator to explore certain trends and outliers in the data, as well as bolster analysis for smaller populations that were not suitable for quantitative analysis (e.g., Katie Beckett Program participants).

MCO Interviews

The independent evaluator conducted three separate interviews (one with each MCO) between October 30 and November 10, 2023, to evaluate MCO efforts to address non-medical needs affecting enrollees' health. Tennessee provided the independent evaluator with the necessary contact information for each MCO, and the independent evaluator reached out to each MCO via email to request their participation. The independent evaluator prefaced that the calls were part of the evaluation to better understand how MCOs address non-medical needs among TennCare enrollees. All three MCOs agreed to participate and were given a summarized list of agenda topics ahead of the interview.

Interviews were 45 minutes long and conducted virtually using Microsoft Teams video calls. The interviews were limited to the MCO participants and the independent evaluator; no representatives from TennCare participated.

During these interviews, the independent evaluator asked questions about strategies to address enrollee access to transportation, housing, food, and other resources that may impact enrollee health. See the Attachments section for the MCO Interview Guide.

TennCare Retroactive Eligibility Surveys

In November 2023, the independent evaluator worked with TennCare and a third-party mailing company to distribute retroactive eligibility surveys (sent to enrollees as "Enrollment Experience Surveys") to 32,942 individuals that were subject to the retroactive eligibility waiver in calendar year 2021. The survey can be found in the Attachments Section. Participants received a QR code and an access code; the QR code allowed for participants to complete the survey on mobile phones or tablets and the access code allowed the independent evaluator to link survey responses non-Personal Identifiable Information (PII) data, such as geographic residence. Materials were distributed on November 3, 2023, and responses were collected from November 9, 2023, through November 30, 2023.

Survey Eligibility

TennCare and the independent evaluator worked together to generate an estimate of how many enrollees were subject to the retroactive eligibility waiver in 2021 and could participate in the survey. The following groups are exempt from the retroactive eligibility waiver and were removed during the estimate-generating process:

- Children (i.e., MAGI children, Katie Beckett, Foster Care, and Deemed Newborns),
- Pregnant women,
- Enrollees receiving HCBS,
- Medicare Savings Program-only enrollees,
- Enrollees with presumptive eligibility, and
- Enrollees eligible for Emergency Medical Services only.

Figure 25 outlines the approach for the retroactive eligibility enrollee surveys.

Area	TennCare Enrollee Surveys – Retroactive Eligibility
Individuals Surveyed	TennCare enrollees subject to the retroactive eligibility waiver; excludes
	Children (i.e., MAGI children, Katie Beckett, Foster Care, and Deemed
	Newborns), pregnant women, enrollees receiving HCBS, Medicare Savings
	Program-only enrollees, enrollees with presumptive eligibility, and enrollees
	eligible for Emergency Medical Services only
Timeframe	November 3-30, 2023
Topics	Barriers to timely enrollment
	Health insurance status
	Change in health status
Mode of Administration	Mobile Phone-Compatible Online Survey, available via QR code on a mailed
	document
Sampling Strategy	Entire universe – 32,942
Number of completed surveys	252
Statistical power assumptions	Response rate allowed for estimating population metrics with a 95%
	confidence level and a margin of error of 6.2%.

Figure 25: Summary of TennCare Enrollee Surveys – Retroactive Eligibility

TennCare Katie Beckett Program Surveys

In November 2023, the independent evaluator distributed surveys to individuals or guardians of individuals that disenrolled from the Katie Beckett program in calendar years 2021 and/or 2022, with emphasis on the extent to which premiums were a factor in those disenrollments. The survey can be found in the Attachments Section. The independent evaluator followed the same QR code design and distribution as outlined for the enrollment experience surveys for the Katie Beckett Program surveys.

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Due to the smaller size of the Katie Beckett program, the independent evaluator opted to survey the entire population of Katie Beckett program enrollees that disenrolled from Part A in 2021 or 2022. The surveys were distributed on November 1, 2023, and responses were collected through November 30, 2023.

Figure 26 outlines the approach for the Katie Beckett and retroactive eligibility enrollee surveys.

-	
Area	TennCare Enrollee Surveys – Katie Beckett
Individuals Surveyed	Beneficiaries in the Katie Beckett (Part A) Program that were separated from the
	program in 2021 or 2022
Timeframe	November 1-30, 2023
Topics	Reasons for disenrollment
	Health insurance status
	Change in health status
Mode of	Mobile Phone-Compatible Online Survey, available via QR code on a mailed
Administration	document
Sampling Strategy	Entire universe
Number of	5
completed surveys	
Statistical power	Due to the small universe of monthly Katie Beckett enrollees (approximately
assumptions	150/month), the independent evaluator was limited in their ability to draw statistical
	conclusions applicable to the broader population. However, the survey will aim to
	inform rationales and areas for descriptive analysis exploration in future evaluations.

Figure 26: Summary of TennCare Enrollee Surveys – Katie Beckett

5. Target and Comparison Populations

The target population for the independent evaluation is all beneficiaries covered by TennCare, or where applicable, the TennCare member subgroup specific to the RQ, such as:

- **CHOICES**. The CHOICES program covers older adults and adults with physical disabilities. To qualify for CHOICES, beneficiaries must need the level of care provided in a NF, or be determined by the state to be at risk of needing institutional care without additional supports, and qualify for Medicaid LTSS.
- Programs for Individuals with I/DD. Programs for individuals with I/DD include ECF CHOICES, 1915(c) waivers, and ICF/IID services. Beneficiaries must meet the definition of intellectual disability or developmental disability.
- Katie Beckett/Medicaid Diversion. The Katie Beckett program covers children with disabilities or complex needs through age 18 with disabilities and/or complex medical needs who are not otherwise Medicaid eligible due to their parents' income or assets.

Comparison Populations

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Comparison populations are used in program evaluation and impact assessment to serve as a counterfactual group from the intervention group where the intervention is not applied. The use of a counterfactual group supports a quasi-experimental study in circumstances where an experimental design (e.g., randomized control trial) would be unethical or infeasible.

The independent evaluator considered both in-state and out-of-state comparison groups. There are several aspects of the demonstration that rendered in-state comparison groups infeasible for the independent evaluation:

- Many of the demonstration components impact the entire TennCare enrollee population. In these cases, all in-state enrollee populations must be considered part of the intervention group.
- For the components that target specific subgroup, such as the Katie Beckett program, the unique characteristics of the target population limit the availability of appropriate in-state comparison groups.
- None of the new demonstration components involve random assignment or staggered implementation.
- Tennessee does not actively maintain an all-payer claims database from which to identify a comparable instate, low-income, and non-Medicaid population.

As a result, when identifying comparison groups for quasi-experimental analyses, the independent evaluator used either beneficiaries with similar characteristics from other states or national/regional benchmarks, depending on the RQ.

Out-of-State Comparison Groups

To select the out-of-state comparison groups, the independent evaluator focused on selecting states similar to Tennessee based on relevant characteristics, such as overall demographics and Medicaid policies. The independent evaluator used data sources such as ACS and BRFSS to find states similar to Tennessee on key state characteristics, such as unemployment rate, Medicaid eligibility Federal Poverty Level cut-off points, percent uninsured, demographic composition, percentage of Medicaid enrollees covered by MCOs, and health status on key indicators. The covariates included cover differences in policy, demographics, and general health outcomes between states. To identify the most similar states, the independent evaluator computed a similarity score that is the inverse of the Euclidean distance between Tennessee and the potential comparison states. The independent evaluator selected the 10 comparison states with the lowest distance metrics relative to Tennessee.¹⁶

Comparison states and selection criteria may differ depending on the RQ (e.g., for RQs regarding the retroactive eligibility waiver, comparison states will provide retroactive coverage to serve as an appropriate counterfactual).

As part of the Interim Evaluation Report, the independent evaluator followed this methodology to determine the appropriate states to use as comparisons, using the data sources and variables in **Figure 27**.

¹⁶ See Stuart, E. A. (2010). Matching methods for causal inference: A review and a look forward. Statistical science: a review journal of the Institute of Mathematical Statistics, 25(1), 1.

Figure 27: Summary of State Characteristics and Variables for Euclidian Matching Model to Select Comparison States

Characteristic	Data Source	Variable Name
Population Estimate	ACS	Population Estimate, July 1, 2021
Medicaid expansion status	KFF	N/A
Percent FPL Limit (Parents, as of January 1,	KFF	N/A
2022)		
Min Wage	DOL	N/A
Percent Urban Population	BRFSS	_URBSTAT
Percent Medicaid Coverage	BRFSS	HLTHCVR1
Marketplace Type	KFF	N/A
Demographics	ACS	S2502_C01_002E through S2502_C01_010E
Unemployment Rate	BRFSS	EMPLOY1
Uninsured Pct of Population	ACS	DP03_0097PE, DP03_0098PE, DP03_0099PE
Percent with cash public assistance income	ACS	DP03_0073PE
Percent of Enrollees with Disabilities	KFF	N/A
MLTSS in place	KFF	N/A
Percent of enrollees in MLTSS	KFF	N/A
Percent using cigarettes	BRFSS	SMOKDAY2
Percent obese	BRFSS	_BMI5CAT
Percent under 100% FPL	KFF	N/A

The independent evaluator originally intended to use propensity score matching to improve difference-indifferences analyses, which depended on T-MSIS data. Because T-MSIS data was unavailable for this evaluation, the independent evaluator did not use propensity score matching in the reported difference-in-differences models. Most remaining difference-in-differences models utilize a benchmark comparison for HEDIS measures. For other analyses using survey datasets like IPUMS ACS and BRFSS, the independent evaluator used the comparison state list from the Euclidian matching model to inform comparison group creation, but not propensity score matching. In lieu of propensity score matching, the independent evaluator utilized the weights that are included in each ACS and BRFSS data extract to achieve more representative samples.

National/Regional Benchmarks

For data sets where beneficiary-level data are not available, the independent evaluator used state-level aggregate measures or national/regional benchmarks for comparison. The independent evaluator used the method described under Out-of-State Comparison Groups above to select appropriate states or regions to serve as comparison benchmarks. When aggregate measures or national/regional benchmarks were used, the independent evaluator identified the necessary covariates to include in the model to control for differences between Tennessee and the selected comparison benchmarks.

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6. Analytic Methods

The independent evaluator used a mixed-methods approach to answer the RQs in this Evaluation.

- Quasi-Experimental Quantitative Methodology. Used to assess program impact:
 - o Difference-in-Differences
 - o Interrupted Time Series
 - One Group Pretest-Posttest
 - Comparison of Means
 - o Descriptive Analyses and One Group Posttest
- Qualitative Analysis. Used to assess stakeholders' perspectives and experiences:
 - o Enrollee Surveys
 - o Key Informant Interviews
 - The following analytic methods were used for this Evaluation.

Difference-in-Differences

The independent evaluator used a quasi-experimental, quantitative design to estimate the causal impact of the TennCare III implementation and policy changes wherever possible. Specifically, for RQs where there are preintervention data and a valid comparison group identified, the independent evaluator used Difference-in-Differences (DiD). DiD is a regression technique that measures the impact of an intervention by comparing changes in outcomes for the target population to changes in outcomes for a comparison group. Using DiD, the impact of TennCare III was isolated as the pre-post difference in an outcome for the intervention group minus the pre-post difference for the comparison group (see methodology described above for comparison group selection). As noted in Section E – Methodological Limitations, the use of DiD was limited due to the lack of available comparison data from T-MSIS.

The identifying assumption for DiD requires "parallel trends," which specifies that the change in the intervention group would have been the same as the change in the comparison group if the intervention (i.e., TennCare III) had not been applied. Violations of this assumption (e.g., the outcome of interest in the comparison state is affected by a separate policy that changes the trend from baseline) will limit the validity of any causal inference from a DiD methodology. Out-of-state comparison groups were selected with the "parallel trends" criterion in mind, and the independent evaluator conducted visual trend analysis and other statistical testing to ensure the assumption holds during the baseline period for the selected comparison states.

The independent evaluator used standard power calculations to assess the appropriate sample size for model specifications. Because T-MSIS data was unavailable for this evaluation, there were not appropriate opportunities for DiD regression models to include beneficiary and geographic-level covariates to control for underlying differences. DiD models either focused on HEDIS measures to compare Tennessee to national benchmarks or used

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survey data. In cases using HEDIS measures, covariates were inappropriate because of the low statistical power and lack of beneficiary-level information. The independent evaluator applied sampling weights and weighting techniques to any survey sample data sources used like BRFSS and ACS. Unless otherwise specified, the DiD analysis used a baseline period of 2017-2020 and an intervention period of 2021 forward. For RQs relying on HEDIS measures, which constitute single observations (i.e., not individual-level) of annual metrics, statistical power is relatively low. In spite of this, the independent evaluator identified some significant results for these RQs. Additionally, with the short baseline period, parallel trends were often difficult to satisfy. Cases where parallel trends may not hold are noted in the results section.

For hypotheses and research questions for policy components that remain unchanged between TennCare II and TennCare III (e.g., CHOICES), it is less likely that a significant change in utilization or other outcomes will be observed between the two demonstrations. In these scenarios, the independent evaluator used pre-period data to address questions about impacts or changes; however, for policies that have been longstanding features of the TennCare demonstration, the ability to use or access pre-period data is limited or infeasible. In those cases, the independent evaluator used DiD (or pre-test/post-test), and the results were interpreted as the change between TennCare II and TennCare III.

Interrupted Time Series

Where valid in-state and out-of-state comparison groups were unavailable due to data limitations but extended pre-intervention data were available, the independent evaluator used an interrupted time series (ITS) design. ITS estimates the impact of an intervention based on the pre-intervention and post-intervention period, using a longitudinal measure of the outcome of interest. ITS requires observations on the target population taken at equal intervals over a time period during which the intervention is implemented (the "interruption"). By repeatedly observing the measure before and after the intervention, the independent evaluator can assess whether the level or trend of the outcome has shifted. If there are sufficient pre-intervention observations and adequate statistical power, ITS may support causal interpretation.

Due to the long intervention period expected for the demonstration (i.e., 10 years) and the balanced observation requirement, utilizing a formal ITS design was not feasible for many RQs. Many measures in available data sets may not have been collected for the entire pre-intervention period, or certain outcome measures may be affected by other events (e.g., separate policy change or recession), rendering any conclusions invalid. The RQs that were most suitable for ITS analysis were ones that focused on metrics that could be converted to a monthly (rather than annual) frequency to increase statistical power. Like DiD, it is necessary to conduct visual trend analysis on the pre-intervention period to ensure linearity of the trends and the absence of seasonal effects. Additionally, using regression analysis with relevant covariates can strengthen the ITS design by controlling for other potential confounding external factors; the covariates should include demographic characteristics, health status, regional and location data, and other variables as relevant and available.

One-Group Pretest-Posttest

In many cases, there are insufficient data points before the implementation of TennCare III to support an ITS design, which requires balanced data points surrounding the intervention period. For these questions, the independent TennCare III Demonstration – 2023 Interim Evaluation Report Page | 40 Independent Evaluator: Guidehouse Inc.

evaluator compared rates/measures calculated before and after the implementation of TennCare III to assess changes in a one-group pretest-posttest design. This design did not permit a causal interpretation; however, the independent evaluator used this analysis to estimate trends in the outcome of interest following the implementation of the intervention. Where applicable, the evaluator used regression techniques to control for changes in enrollee characteristics over time to improve the estimation of the trend in the measured outcome.

Comparison of Means

In instances where a comparison group or national/regional benchmark are available for the selected measure, but pre-intervention data are limited or unavailable, the independent evaluator used a comparison of means (i.e., post-test only with non-equivalent comparison group). This method estimated changes in the outcome of interest for the intervention group against the comparison group over time. Where applicable, the independent evaluator incorporated regression techniques to control for observable characteristics and potential confounding variables to support an improved comparison. Additionally, the independent evaluator leveraged statistical tests to test for the significance of findings (e.g., Chi-squared tests). However, because this analysis did not control for pre-intervention trends that could continue during the intervention period, the conclusions did not support causal inference and were be limited to observational trends regarding the outcomes of interest.

Descriptive Analyses and One-Group Posttest-Only

For measures without pre-intervention data, the interim evaluation was limited to summary statistics and observational (non-causal) inference on trends from the baseline period. For RQs assessing beneficiary characteristics, service utilization, or other descriptive variables, the independent evaluator calculated standard summary statistics (e.g., total, median, mean, etc.) to report findings. Where appropriate, the independent evaluator used statistical tests (e.g., Chi-Squared test) to assess the statistical significance of findings and differences between subgroups.

The independent evaluator used a one-group posttest-only design to analyze measures without pre-intervention data or a comparison group over time. This analysis describes change in the outcome of interest for the target population from baseline over time, but the assessment is limited by the lack of pre-intervention data. Where appropriate, the evaluator used regression techniques to control for changes in enrollee characteristics over time to improve the estimation of the trend in the measured outcome.

Qualitative Analysis

The independent evaluator collected qualitative data from TennCare enrollees through mobile phone-compatible online surveys. The qualitative data was categorized and coded systematically using a standard qualitative methodology or software. The independent evaluator used thematic analysis, which is a systematic and iterative data coding and analysis process that allowed the independent evaluator to identify themes or patterns within the responses. The independent evaluator also conducted key informant interviews with Tennessee Managed Care Organizations (MCOs).

7. Analytic Tables

Figure 28, Figure 29, Figure 30, Figure 31, and Figure 32 outline the hypotheses, RQs, outcome measures, related data specifications, data sources and timeframes, comparison groups, analytic approaches, and exhibits for each demonstration goal.

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
Hypothesis 1.1 – Following im	plementation of the TennCare III	demonstration, quality of care and health outcome	s for TennCare enrollees	will maintain or improve.		
Primary RQ 1.1.a: Has the	- Controlling High Blood	- Numerator: number of enrollees 18-85	- NCQA HEDIS®	- National / regional	- Difference-in-	- Figure 35-Figure 36
implementation of TennCare	Pressure	years of age who had a diagnosis of	(2017-2030)	benchmarks	differences	
III maintained or improved		hypertension and had adequately controlled			- Descriptive analysis	
physical health outcomes for		blood pressure (<140/90 mm Hg)				
TennCare enrollees?		- Denominator: the eligible population				
	- Comprehensive Diabetes	- Numerator: number of enrollees 18–75				
	Care: HbA1c Poor	years of age with diabetes (type 1 and type				
	Control (>9.0%)	2) who had HbA1c poor control (>9.0%)				
		- Denominator: the eligible population				
Primary RQ 1.1.b: Has the	- Cervical Cancer	- Numerator: number of female enrollees 21–	- NCQA HEDIS®	- National / regional	- Difference-in-	- Figure 37-Figure 39
implementation of TennCare	Screening	64 years of age who were screened for	(2017-2030)	benchmarks	differences	
III maintained or increased		cervical cancer using any of the following			- Descriptive analysis	
the utilization rates of		criteria:				
preventive or wellness		- Female enrollees 21–64 years of				
services for TennCare		age who had cervical cytology				
enrollees?		performed within the last 3 years				
		- Female enrollees 30–64 years of				
		age who had cervical high-risk				
		human papillomavirus (hrHPV)				
		testing performed within the last 5				
		years				
		- Female enrollees 30–64 years of				
		age who had cervical cytology/high-				
		risk human papillomavirus (hrHPV)				

Figure 28: Analytic Table – Goal 1: Provide high-quality care to enrollees that will improve health outcomes

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
		cotesting within the last 5 years				
		- Denominator: the eligible female population				
	- Well-Child Visits in the	Rate 1 – Well-Child Visits in the First 15 Months				
	First 30 Months of Life,	- Numerator: number of enrollees with six or				
	First 15 Months ¹⁷	more well-child visits with a PCP on different				
		dates of service on or before the 15-month				
		birthday				
		- Denominator: The Rate 1-eligible population				
		Rate 2 - Well-Child Visits for Age 15 Months-30				
		Months				
		- Numerator: number of enrollees with two or				
		more well-child visits with a PCP on different				
		dates of service between the child's 15-				
		month birthday plus 1 day and the 30-				
		month birthday				
		- Denominator: The Rate 2-eligible population				
	- Child and Adolescent	- Numerator: number of enrollees ages 3-21				
	Well-Care Visits	with one or more well-care visits during the				
		MY				
		- Denominator: the eligible population				
	- Childhood Immunization	- Numerators: number of enrollees 2 years of				
	Status, Combo 10	age who had four diphtheria, tetanus, and				
		acellular pertussis (DTaP); three polio (IPV);				
		one measles, mumps, and rubella (MMR);				
		three haemophilus influenza type B (HiB);				

 $^{\rm 17}$ As of 2020, Well-Child Visits in the First 30 Months of Life contains two rates.

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
		 three hepatitis B (HepB), one chicken pox (VZV); four pneumococcal conjugate (PCV); one hepatitis A (HepA); two or three rotavirus (RV); and two influenza (flu) vaccines by their second birthday Denominator: the eligible population 				
Primary RQ 1.1.c: Has the implementation of TennCare III maintained or increased the utilization rates of EPSDT services for TennCare enrollees?	 EPSDT Screening ratio EPSDT Participant ratio 	 Numerator: total EPSDT screenings received by eligible enrollees, by age group Denominator: total expected number of screenings, by age group Numerator: total eligible enrollees receiving at least one initial or periodic screening Denominator: total eligible enrollees who should receive at least one initial or periodic screening 	 EPSDT Data (2017-2030) Annual National EPSDT Data (2017 – 2030) 	 National / regional benchmarks 	 Difference-in- differences Descriptive analysis 	- Figure 40-Figure 42
Primary RQ 1.1.d: Has the implementation of TennCare III maintained or improved the management of BH conditions for TennCare enrollees?	 Follow-Up after Hospitalization for Mental Illness (Adults) Follow-up after Hospitalization for Mental Illness (Children) 	 Numerator: number of enrollees 18 years and older who were hospitalized for treatment of selected mental illness or intentional self-harm diagnoses and who had a follow-up visit with a MH provider within 30 days after discharge Denominator: the eligible population Numerator: number of enrollees ages 6 to 18 years who were hospitalized for treatment of selected mental illness or intentional self-harm diagnoses and who had a follow-up visit with a MH provider within 30 days after discharge Denominator: the eligible population 	- NCQA HEDIS® (2017-2030)	 National / regional benchmarks 	 Difference-in- differences Descriptive analysis 	- Figure 43

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
Hypothesis 1.2 – Following im	plementation of the TennCare II	demonstration, opioid misuse will maintain or dec	rease among TennCare ei	nrollees, access to MAT will	maintain or increase, and h	ealth outcomes associated with
opioid misuse will maintain or	improve.					
Primary RQ 1.2.a: Has the implementation of TennCare III maintained or decreased	 Number of Opioid Users – First Time 	 Number of unique enrollees receiving an opioid prescription for the first time, annually 	- Pharmacy Claims Data (2017-2030)	- Not applicable	- One-group pretest- posttest	- Figure 44
opioid use among TennCare enrollees (i.e., first-time, acute, and chronic opioid users)?	 Number of Opioid Users Acute 	 Number of unique enrollees that have received less than a 90-day quantity of prescribed opioids in the 180 days period immediately preceding the opioid's prescription day, annually 				
	- Number of Opioid Users - Chronic	 Number of unique enrollees that have received more than a 90-day quantity of prescribed opioids in the 180 days period immediately preceding the opioid's prescription day, annually 				
	 Number of Opioid Prescriptions per 1,000 Members 	 Numerator: total number of opioids prescriptions in a MY x 1,000 Denominator: total number of unique enrollees in the same year 				
	 Days' Supply of Opioid Prescriptions 	 Average days' supply of opioid prescriptions to enrollees annually 				
Primary RQ 1.2.b: Has the implementation of TennCare III maintained or decreased the number of Neonatal Abstinence Syndrome live births?	 Neonatal Abstinence Syndrome Live Births 	 Total annual number of live births associated with neonatal abstinence syndrome 	 TennCare Claims and Encounter Data (2017-2030) Tennessee Department of Health Vital Statistics Records (2017-2030) 	- Not applicable	- Interrupted time series	- Figure 45

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Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
Primary RQ 1.2.c: Has the	- Use of Pharmacotherapy	- Numerator: number of enrollees ages 18 to	- NCQA HEDIS®	- National/regional	- Difference-in-	- Figure 46
implementation of TennCare	for OUD	64 with an OUD who filled a prescription for	(2022-2030)	benchmarks	differences	
III maintained or improved		or were administered or dispensed an FDA-			- Descriptive analysis	
the rate of OUD treatment		approved medication for the disorder during				
for TennCare enrollees?		the MY				
		- Denominator: number of enrollees with at				
		least one encounter with a diagnosis of				
		opioid abuse, dependence, or remission				
		(primary or other) at any time during the MY				
Primary RQ 1.2.d: Has the	- Total number of unique	- Total number of unique providers in	- TennCare	- Not applicable	- One-group pretest-	- Figure 47
implementation of TennCare	providers in BESMART	BESMART program across all MCOs	Provider		posttest	
III maintained or improved	program		Enrollment Data			
access to MAT?	- Total number of unique	- Total number of unique TennCare enrollees	(2019-2030)			
	TennCare enrollees	served in BESMART program	- TennCare Claims			
	served in BESMART		and Encounter			
	program		Data (2019-2030)			
Hypothesis 1.3 – Following im	plementation of the TennCare III	demonstration, quality outcomes and quality of life	e for TennCare CHOICES a	nd individuals with I/DD wi	ll maintain or improve.	·
Primary RQ 1.3.a: Has the	- Percentage of people	- Numerator: number of people who reported	- NCI-AD Survey	- Not applicable	- One-group pretest-	- Figure 48
implementation of TennCare	who know how to	they know how to manage their chronic	(MY 2016-2030)		posttest	
III maintained or improved	manage their chronic	conditions (Response Options: Yes, In-				
quality outcomes for	conditions	Between/Some Conditions, No, Don't Know,				
CHOICES enrollees?		Unclear/Refused/No Response)				
		- Denominator: total number of respondents				
	- Percentage of people	- Numerator: number of people whose health				
	whose health was	was described as having gotten better				
	described as having	compared to 12 months ago (Response				
	gotten better compared	Options: Much Worse, Somewhat Worse,				
	to 12 months ago	About the Same, Somewhat Better, Much				
		Better, Don't Know, Unclear/Refused/No				

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
Research Question Primary RQ 1.3.c: Has the implementation of TennCare III maintained or improved quality outcomes for individuals with I/DD?	 Outcome Measure(s) Percentage of people who reported they always have a way to get places when they need to go somewhere The percentage of people who report regularly participating in everyday integrated activities in their communities The percentage of people who report being able to see and/or communicate with their families and friends when they want The percentage of people who report that 	SpecificationsResponse)Denominator: total number of respondentsNumerator: number of people who reported they always have a way to get places when they need to go somewhere (Response Options: No, Almost Never, Sometimes, Almost Always, Yes)Denominator: total number of respondentsNumerator: number of people who reported regularly participating in everyday integrated activities in their communities (Response Options: Zero times, Once or Twice, Three to Four Times, More than Five Times)Denominator: total number of respondentsNumerator: number of people who reported heing able to see and/or communicate with their families and friends when they want (Response Options: Yes, No, Chooses Not to See Family)Denominator: total number of respondentsNumerator: number of people who reported being able to see and/or communicate with their families and friends when they want (Response Options: Yes, No, Chooses Not to See Family)Denominator: total number of respondentsNumerator: number of people who reported that staff treat them with respect (Response	- NCI Survey (MY 2019-2030)	Comparison Group - Respondents to NCI Survey in other states	Analytic Approach - Difference-in- differences	Applicable Figures - Figure 49-Figure 60
Primary RQ 1.3.d: Has the implementation of TennCare	 staff treat them with respect Percentage of people who reported they chose 	 Options: No, Yes, Sometimes or Some Staff) Denominator: total number of respondents Numerator: number of people who reported they chose or had some input in choosing 				

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
III maintained or improved	or had some input in	their residence (Response Options:				
quality of life for individuals	choosing their residence	Someone Else Chose, Person Made the				
with I/DD?		Choice, Person Had Some Input)				
	- Percentage of people	 Denominator: total number of respondents Numerator: number of people who reported 	-			
	who reported they chose	they chose or had some input in choosing				
	or had some input in	their work (Response Options: Someone Else				
	choosing their work	Chose, Person Made the Choice, Person Had				
		Some Input)				
		- Denominator: total number of respondents				
	- Percentage of people	- Numerator: number of people who reported				
	who reported they chose	they chose or had some input in choosing				
	or had some input in	their day activity (Response Options:				
	choosing their day	Someone Else Chose, Person Made the				
	activity	Choice, Person Had Some Input)				
		- Denominator: total number of respondents				
	- Percentage of people	- Numerator: number of people who reported				
	who reported they chose	they chose or had some input in choosing				
	or had some input in	their staff (Response Options: Someone Else				
	choosing their staff	Chose, Person Made the Choice, Person Had				
		Some Input)				
		- Denominator: total number of respondents				
	- Percentage of people	- Numerator: number of people who reported				
	who reported they chose	they chose or had some input in choosing				
	or had some input in	their roommates (Response Options:				
	choosing their	Someone Else Chose, Person Made the				
	roommates					

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
		Choice, Person Had Some Input)				
		- Denominator: total number of respondents				
	- Percentage of people	 Numerator: number of people who reported 				
	who reported they	they decided or had help deciding their daily				
	decided or had help	schedule (Response Options: Someone Else				
	deciding their daily	Chose, Person Made the Choice, Person Had				
	schedule	Some Input)				
		- Denominator: total number of respondents				
	- Percentage of people	- Numerator: number of people who reported				
	who reported they	they decided or had help deciding how to				
	decided or had help	spend money (Response Options: Someone				
	deciding how to spend	Else Chose, Person Made the Choice, Person				
	money	Had Some Input)				
		- Denominator: total number of respondents				
	- Percentage of people	- Numerator: number of people who reported				
	who reported they	they decided or had help deciding how to				
	decided or had help	spend free time (Response Options:				
	deciding how to spend	Someone Else Chose, Person Made the				
	free time	Choice, Person Had Some Input)				
		- Denominator: total number of respondents				
	- Percentage of people	- Numerator: number of people who reported	1			
	who reported they	they always have a way to get places when				
	always have a way to get	they need to go somewhere (Response				
	places when they need	Options: No, Almost Never, Sometimes,				
	to go somewhere	Almost Always, Yes)				
		- Denominator: total number of respondents				

Figure 29: Analytic Table – Goal 2: Ensure enrollee access to health care, including safety net providers

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
Hypothesis 2.1 – Following im	plementation of the TennCare III	demonstration, enrollee utilization of services will	maintain or improve.			
Primary RQ 2.1.a: Has the	See subsidiary questions	See subsidiary questions below.	See subsidiary	See subsidiary questions	See subsidiary questions	See subsidiary questions
implementation of TennCare	below.		questions below.	below.	below.	below.
III maintained or improved						
enrollee utilization of						
services? ¹⁸						
• Primary care visits						
 Inpatient visits 						
BH visits						
 Prescription drugs 						
Subsidiary RQ 2.1.a.i: Has	- Adults' Access to	- Numerator: number of members 20 years	- NCQA HEDIS®	- National/regional	- Difference-in-	- Figure 61
the implementation of	Preventive / Ambulatory	and older who had one or more ambulatory	(2017-2030)	benchmarks	differences	
TennCare III maintained or	Health Services	or preventive care visit during the			- Descriptive analysis	
improved utilization of		measurement year				
primary care?		- Denominator: the eligible population				
Subsidiary RQ 2.1.a.ii: Has	- Total Inpatient –	- Numerator: number of acute inpatient	- NCQA HEDIS®	- National/regional	- One group pretest-	- Figure 62
the implementation of	Inpatient Discharges per	discharges during the measurement year x	(2017-2030)	benchmarks	posttest	
TennCare III maintained or	1,000 Member Months	1,000			- Descriptive analysis	
improved utilization of		- Denominator: total number of unique				
inpatient care?		enrollees in the same year				
Subsidiary RQ 2.1.a.iii: Has	- Mental Health Utilization	- Numerator: number of members receiving	- NCQA HEDIS®	- National/regional	- One group pretest-	- Figure 63
the implementation of	– Services per 1,000	any mental health service (including	(2017-2030)	benchmarks	posttest	
TennCare III maintained or	Member Months	inpatient, intensive outpatient or partial			- Descriptive analysis	

¹⁸ The independent evaluator will examine whether observed changes in service utilization measures suggest that the volume and mix of services utilized is shifting in the direction of lower cost types of care, when clinically appropriate (e.g., if increased primary care visits are observed, if there is an association between primary care visit rates and emergency department visit and inpatient visit rates). The independent evaluator will interpret the service utilization measures in the context of other measures in the Evaluation (e.g., health outcome measures).

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Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
improved utilization of BH treatment?		 hospitalization, outpatient, and emergency department) during the measurement year x 1,000 Denominator: total number of unique enrollees in the same year 				
Subsidiary RQ 2.1.a.iv: Has the implementation of TennCare III maintained or improved utilization of outpatient prescription	 Per member per month number of outpatient prescriptions for members utilizing prescription services 	 Numerator: Total number of outpatient prescriptions for members utilizing prescription services Denominator: Member months 	- Pharmacy Claims Data (2017-2030)	- Not applicable	- Interrupted time series	- Figure 64-Figure 65
drugs?	 Per member per month number of outpatient prescriptions filled per month 	 Numerator: Total number of outpatient prescriptions filled per month Denominator: Member months 				
Hypothesis 2.2 – Following im	plementation of the TennCare III	demonstration, access to comprehensive primary c	are will maintain or incre	ase.	·	•
Primary RQ 2.2.a: Has the implementation of TennCare III maintained or increased	 Total number of unique TennCare enrollees in PCMHs 	 Total number of unique TennCare enrollees in PCMHs 	- TennCare PCMH Enrollment Data (2017-2030)	- Not applicable	 One-group pretest- posttest 	- Figure 66
the number and proportion of TennCare enrollees cared for through the PCMH model?	 Proportion of TennCare enrollees in a PCMH 	 Numerator: number of unique enrollees receiving PCMH care Denominator: total number of enrollees 				
Hypothesis 2.3 – Following im	plementation of the TennCare III	demonstration, member engagement in prenatal a	and postpartum care will	maintain or increase.		
Primary RQ 2.3.a: Has the implementation of TennCare III maintained or increased member engagement in	- Timeliness of Prenatal Care	 The percentage of deliveries that received a prenatal care visit in the first trimester, on or before the enrollment start date or within 42 days of enrollment in the organization.¹⁹ 	- NCQA HEDIS® (2017-2030)	 National / regional benchmarks 	 Difference-in- differences Descriptive analysis 	- Figure 67

 $^{^{19}}$ The independent evaluator will adhere to the detailed ${\rm HEDIS}^{\oplus}$ specifications for this measure.

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Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
prenatal care?						
Primary RQ 2.3.b: Has the	- Postpartum Care	- The percentage of deliveries that had a	- TennCare	- Not applicable	- One-group pretest-	- Figure 68-Figure 71
implementation of TennCare		postpartum visit on or between 7 and 84	Enrollee Data		posttest	
III maintained or increased		days after delivery. ²⁰	(2017-2030)			
member engagement in	- Contraceptive Care	Rate 1	- TennCare Claims			
postpartum care?	Postpartum: Women	- Numerator: number of women ages 15-20	Data (2017-2030)			
	Ages 15-20	who had a live birth and were provided a				
		most effective or moderately effective				
		method of contraception within 3 and 60				
		days of delivery				
		- Denominator: number of women ages 15-20				
		who had a live birth in the measurement				
		year				
		Rate 2				
		- Numerator: number of women ages 15-20				
		who had a live birth and were provided a				
		long-acting reversible method of				
		contraception (LARC) within 3 and 60 days				
		of delivery				
	- Contraceptive Care	Rate 1]			
	Postpartum: Women	- Numerator: number of women ages 21-44				
	Ages 21-44	who had a live birth and were provided a				
		most effective or moderately effective				
		method of contraception within 3 and 60				
		days of delivery				
		- Denominator: number of women ages 21-44				

 $^{^{\}rm 20}$ The independent evaluator will adhere to the detailed HEDIS* specifications for this measure.

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Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
Research Question	 Outcome Measure(s) Screening for Postpartum Depression and Follow- Up Plan: Ages 18 years and older 	 Specifications who had a live birth in the measurement year Rate 2 Numerator: number of women ages 21-44 who had a live birth and were provided a long-acting reversible method of contraception (LARC) within 3 and 60 days of delivery Numerator: Number of enrollees, ages 18 years and older, screened for postpartum depression on the date of the encounter or up to 14 days prior to the date of the encounter using an age-appropriate standardized tool AND if positive, a follow up plan is documented on the date of the eligible encounter Denominator: number of enrollees aged 18 years and older at the beginning of the measurement period with at least one eligible encounter during the measurement 	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
		period				
Hypothesis 2.4 – Following im resources.	plementation of the TennCare III	demonstration, MCOs will encourage and/or facilit	ate the identification of r	non-medical needs affecting	enrollees' health and the re	eferral of enrollees to
Primary RQ 2.4.a: What strategies did the MCOs	 MCOs' strategies related to non-medical needs 	- Not applicable	- MCO Interviews (2023)	- Not applicable	- Qualitative Analysis	- Figure 72-Figure 73

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
implement to address non-	affecting enrollees'					
medical needs affecting	health, such as:					
enrollees' health?	- Food insecurity					
	- Transportation					
	- Housing instability					
	- Other domains of non-					
	medical needs affecting					
	enrollees' health					
Hypothesis 2.5 – Following im	plementation of the TennCare III	demonstration, participant engagement in dental	services for eligible Tenn	Care III enrollees will mainta	in or increase.	•
Primary RQ 2.5.a: Has	- Partial Enrollment	- Numerator: sum of the full-time equivalent	- DBM Claims Data	- Not applicable	- Interrupted time	- Figure 74-Figure 75
participant engagement in	Adjusted Ratio (PEAR)	(FTE) for qualifying eligibles with 1 or more	(2017-2030)		series	
dental services for TennCare		qualifying services in the MY				
children and adolescents		- Denominator: sum of FTE for all qualifying				
maintained or increased		eligible				
following implementation of		- FTE equals the number of days				
TennCare III?		eligible divided by 365.25				
	- DBM dental sealant rate	- Numerator: number of unduplicated	- DBM Claims Data	- Not applicable	- Interrupted time	- Figure 76
		enrollees receiving qualifying dental sealant	(2017-2030)		series	
		service in the MY on at least one of the				
		following teeth: 2, 3, 14, 15, 18, 19, 30, 31				
		- Denominator: number of unduplicated				
		sealant-eligible population				
	- DBM silver diamine	- Numerator: number of unduplicated	- DBM Claims Data	- Not applicable	- Interrupted time	- Figure 77
	fluoride (SDF) rate	enrollees receiving qualifying SDF service in	(2017-2030)		series	
		the MY on a primary or permanent tooth				
		- Denominator: number of unduplicated				
		eligible population				
Primary RQ 2.5.b: Has	- Number of pregnant	- Number of pregnant TennCare enrollees	- DBM Claims Data	- Not applicable	- One-group posttest-	- N/A
participant engagement in	TennCare enrollees over	over 21 utilizing dental services during the	(2022-2030)		only	

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
dental services for pregnant	21 utilizing dental	perinatal period				
TennCare enrollees	services during the					
maintained or increased	perinatal period					
following implementation of						
TennCare III?						
Hypothesis 2.6 – Under Tenn(Care III, enrollees will receive Mea	licaid benefits in excess of those available under the	e Medicaid State Plan.			
Primary RQ 2.6.a: What	- Description of benefits	- Not applicable	- TennCare	- Not applicable	- Qualitative analysis	- N/A
benefits did TennCare	and coverage in excess of		Medicaid Rules			
enrollees receive that were	benefits under Medicaid		(2022-2030)			
in excess of the benefits	State Plan		- TennCare Benefit			
authorized under the			Packages (2022-			
Medicaid State Plan			2030)			
following implementation of						
TennCare III?						
Hypothesis 2.7 – DSIPs will co	ntinue to provide important servi	ces to Tennesseans.				
Primary RQ 2.7.b: Do	- Population to BH	- Numerator: number of Tennessee residents	- Tennessee	- Not applicable	- Descriptive analysis	- Figure 78
Tennesseans have access to	provider ratio	per county	Department of			
BH and I/DD provider and		- Denominator: number of BH providers per	Health Safety Net			
service delivery networks?		county	Reports (2011-			
			2030)			
			- State			
			Administrative			
			Data (2017-2030)			
	- Population to I/DD	- Numerator: number of Tennessee residents	- State	- Not applicable	- One-group pretest-	- Figure 79
	provider ratio	per county	Administrative		posttest	
		- Denominator: number of I/DD providers per	Data (2017-2030)			
		county				

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
Hypothesis 2.9 – The retroacti	ve eligibility waiver will not sign	ificantly impact the likelihood of enrollment, health	status of enrollees, or h	ave an adverse financial impo	act.	
Primary RQ 2.9.a: Do	- Percentage of Medicaid	- Numerator: total number of Medicaid	- TennCare	- Similar adults in	- Difference-in-	- Figure 80-Figure 81
Medicaid-eligible individuals	enrollees by eligibility	enrollees subject to the retroactive eligibility	Eligibility and	other states that	differences	
in Tennessee subject to the	group out of estimated	waiver	Enrollment Data	provide retroactive		
retroactive eligibility waiver	eligible Medicaid	- Denominator: estimated number of	(2017-2030)	coverage		
enroll in Medicaid at the	recipients	Medicaid-eligible individuals that would be	- Integrated Public			
same rates as eligible		subject to the retroactive eligibility waiver	Use Microdata			
individuals in other states			Series (IPUMS)			
who have access to			American			
retroactive eligibility?			Community			
			Surveys (ACS)			
			(2017-2030)			
Primary RQ 2.9.c: Do the	- Reported excellent or	- BRFSS variables:	- Behavioral Risk	- Similar adults in	- Difference-in-	- Figure 82-Figure 85
health outcomes of enrollees	very good health status;	GENHLTH, MENTHLTH, PHYSHLT, POORHLTH	Factor	other states that	differences	
subject to the retroactive	healthy days		Surveillance	provide retroactive		
eligibility waiver differ from			System (BRFSS)	coverage		
those of enrollees in other			(2017-2030)			
states who have access to						
retroactive eligibility?						
Primary RQ 2.9.d: What are	- Reported barriers to	- Not applicable	- TennCare	- Not applicable	- Descriptive analysis	- Figure 86-Figure 89
common barriers to timely	timely renewal		Enrollee Survey			
renewal for enrollees subject						
to the retroactive eligibility						
waiver?						

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
Hypothesis 3.1 – Following im	plementation of the TennCare III	demonstration, TennCare enrollee satisfaction with	h health care services wil	ll maintain or improve.		
Primary RQ 3.1.a: Has the implementation of TennCare III maintained or improved TennCare enrollee satisfaction with overall health care?	 Percent of Respondents Indicating Satisfaction with TennCare 	 Numerator: number of respondents indicating they are "very satisfied" or "somewhat satisfied" with the TennCare program Denominator: total number of survey respondents 	- Beneficiary Satisfaction Survey (2011- 2030)	- Not applicable	- Interrupted time series	- Figure 90
Primary RQ 3.1.b: Has the implementation of TennCare III maintained or improved CHOICES enrollee satisfaction?	 Percentage of people whose paid support staff do things the way they want them done Percentage of people whose long-term care services meet all their current needs and goals The percentage of people who report satisfaction 	 Numerator: number of respondents who reported paid support staff do things the way they want them done (Response Options: No/Never/Rarely, Some/Usually, Yes/Always/Almost Always, Don't Know, Unclear/Refused/No Response) Denominator: total number of respondents Numerator: number of respondents who reported long-term care services meet all their current needs and goals (Response Options: No/Not at All, Some Needs and Goals, Yes/Completely/All Needs and Goals, Don't Know, Unclear/Refused/No Response) Denominator: total number of respondents 	- NCI-AD Survey (MY 2016-2030)	- Not applicable	- One-group pretest- posttest	- Figure 91

Figure 30: Analytic Table – Goal 3: Ensure enrollees' satisfaction with services

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
	participation in various	activities (Response Options: No, Yes, In				
	community activities	Between)				
		- Denominator: total number of respondents				

Figure 31: Analytic Table – Goal 4: Provide enrollees with appropriate and cost-effective HCBS within acceptable budgetary parameters

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
Hypothesis 4.1 – Following imp	plementation of the TennCare III	demonstration, the proportion of individuals who	receive HCBS rather than l	NF care will maintain or in	ncrease.	
Primary RQ 4.1.a: Has the	- Number and percentage	- Numerator: number of CHOICES enrollees	- TennCare Claims	 Not applicable 	- One group pretest-	- Figure 92
implementation of TennCare	of CHOICES enrollees	actively receiving HCBS at the end of each	and Encounter		posttest	
III maintained or increased	actively receiving HCBS at	demonstration year	Data (2017-2030)			
the number and percentage	a point-in-time, by	- Denominator: total number of CHOICES				
of CHOICES enrollees actively	benefit group	enrollees at the end of each demonstration				
receiving HCBS?		year				
	- Aggregate number and	- Numerator: unduplicated number of				
	percentage of CHOICES	CHOICES enrollees receiving HCBS over a				
	enrollees actively	12-month period				
	receiving HCBS, by	- Denominator: unduplicated number of				
	benefit group	CHOICES enrollees over the same 12-				
		month period				
	- Number and percentage	- Numerator: number of CHOICES enrollees				
	of CHOICES enrollees	actively receiving NF at the end of each				
	actively receiving NF	demonstration year				
	services at a point-in-	- Denominator: total number of CHOICES				
	time, by benefit group	enrollees at the end of each demonstration				
		year				
	- Aggregate number and	- Numerator: unduplicated number of	1			
	percentage of CHOICES	CHOICES enrollees receiving NF over a 12-				

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
	enrollees actively receiving NF services, by benefit group	month period - Denominator: unduplicated number of CHOICES enrollees over the same 12- month period				
Primary RQ 4.1.b: Has the implementation of TennCare III maintained or increased the ratio of HCBS to NF service costs for CHOICES enrollees?	 Annual HCBS service costs for CHOICES enrollees HCBS service costs for CHOICES enrollees as a percentage of total long- term care service costs 	 Based on encounters and not cap payments Numerator: total annual HCBS service costs for CHOICES enrollees Denominator: total annual LTSS service costs (HCBS and NF) for CHOICES enrollees 	- TennCare Claims and Encounter Data (2017-2030)	- Not applicable	- One group pretest- posttest	- Figure 93
	 Annual NF service costs for CHOICES enrollees NF service costs for CHOICES enrollees as a percentage of total long- term care service costs 	 Based on encounters and not cap payments Numerator: total annual NF service costs for CHOICES enrollees Denominator: total annual LTSS service costs (HCBS and NF) for CHOICES enrollees 				
Primary RQ 4.1.c: Has the implementation of TennCare III maintained or decreased the average LTSS costs per CHOICES enrollee?	 Average annual HCBS service costs per CHOICES enrollee Average annual NF service costs per CHOICES enrollee 	 Based on encounters and not cap payments Based on encounters and not cap payments 	- TennCare Claims and Encounter Data (2017-2030)	- Not applicable	- Descriptive analysis	- Figure 94
Primary RQ 4.1.d: Has the implementation of TennCare III maintained or increased the number and percentage of individuals with I/DD actively receiving HCBS?	 Number and percentage of individuals with I/DD actively receiving HCBS at a point-in-time, by benefit group 	 Numerator: number of individuals with I/DD actively receiving HCBS at the end of each demonstration year Denominator: total number of individuals with I/DD at the end of each demonstration year 	- TennCare Claims and Encounter Data (2017-2030)	- Not applicable	- One group pretest- posttest	- Figure 95

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
Primary RQ 4.1.e: Has the	 Aggregate number and percentage of individuals with I/DD actively receiving HCBS, by benefit group Annual HCBS service 	 Numerator: unduplicated number of individuals with I/DD receiving HCBS over a 12-month period Denominator: unduplicated number of individuals with I/DD over the same 12- month period Based on encounters and fee-for-service 	- TennCare Claims	- Not applicable	- Descriptive analysis	- Figure 96
implementation of TennCare III maintained or increased	costs for individuals with I/DD	expenditures, not capitation payments	and Encounter Data (2017-2030)			
the ratio of HCBS to ICF/IID service costs for individuals with I/DD?	 HCBS service costs for individuals with I/DD as a percentage of total long- term care service costs Annual ICF/IID service costs 	 Numerator: total HCBS service costs for individuals with I/DD annually Denominator: total LTSS service costs (HCBS and ICF/IID) for individuals with I/DD annually Based on encounters and fee-for-service expenditures, not capitation payments Based on encounters and fee-for-service expenditures, not capitation payments 				
	 ICF/IID service costs as percentage of total LTSS service costs for individuals with I/DD 	 Numerator: total ICF/IID service costs for individuals with I/DD annually Denominator: total LTSS service costs (HCBS and ICF/IID) for individuals with I/DD annually Based on encounters and fee-for-service expenditures, not capitation payments 				
Primary RQ 4.1.f: Has implementation of the TennCare III demonstration	 Average HCBS service costs per individual with I/DD 	- Based on encounters and fee-for-service expenditures, not capitation payments	- TennCare Claims and Encounter Data (2017-2030)	- Not applicable	- Descriptive analysis	- Figure 96

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
maintained or decreased the	- Average ICF/IID service	- Based on encounters and fee-for-service				
average LTSS costs per	costs per individual with	expenditures, not capitation payments				
individual with I/DD?	I/DD					
Primary RQ 4.1.g: Has the	- Institutional diversion –	- Numerator: Number of CHOICES enrollees	- TennCare Claims	- Not applicable	- One group pretest-	- Figure 97
implementation of TennCare	CHOICES enrollees who	annually who meet level of care for NF but	and Encounter		posttest	
III maintained or increased	meet NF level of care but	access HCBS for a minimum of 90 days	Data (2017-2030)			
the level of institutional	access HCBS as an	- Denominator: total number of unique				
transition and diversion for	alternative	CHOICES enrollees annually				
CHOICES enrollees?	- Institutional transition –	- Number of CHOICES enrollees who use				
	number of CHOICES	transition services to move from NFs to				
	enrollees who transition	HCBS annually				
	from NFs to HCBS					
	annually					
	- Diversion – NF diversion	- Numerator: number of individuals applying	- TennCare Claims	- Not applicable	- One-group pretest-	
	rate	for NF care but diverted to HCBS annually	and Encounter		posttest	
		- Denominator: total number of individuals	Data (2012030)			
		applying to NF care annually				
	- Diversion – average	- Numerator: total length of stay in HCBS for	- TennCare Claims	- Not applicable	- One group pretest-	
	CHOICES enrollee length	all unique CHOICES enrollees annually	and Encounter		posttest	
	of stay in HCBS yearly	- Denominator: total number of unique	Data (2012030)			
		CHOICES enrollees annually				
	- Diversion – percent of	- Numerator: number of new LTSS recipients				
	new LTSS recipients	in CHOICES admitted to NFs annually				
	admitted to NFs yearly	- Denominator: number of new LTSS				
		recipients in CHOICES				
Hypothesis 4.2 – Following imp	lementation of the TennCare III	demonstration, participation levels in integrated e	mployment for individual	s with I/DD will maintain or	increase.	
Primary RQ 4.2.a: Has the	 Number of working age 	 Number of working age adults with I/DD 	- TennCare	- Not applicable	- One-group pretest-	- Figure 98
implementation of TennCare	adults with I/DD enrolled	enrolled in HCBS programs who are	Individual		posttest	
III maintained or increased	in HCBS programs who	employed in an integrated setting earning	Employment Data			

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
the number of individuals with I/DD that participate in	are employed in an integrated setting	at or above the minimum wage	Survey (2017- 2030)			
integrated employment and	earning at or above the		,			
earn at or above the	minimum wage					
minimum wage?	 Percentage of working age adults with I/DD enrolled in HCBS programs who are employed in an integrated setting earning at or above the minimum wage 	 Numerator: number of individuals (22-62) with I/DD enrolled in HCBS programs who are employed in an integrated setting earning at or above the minimum wage as reported in the Individual EDS annually Denominator: Total number of individuals with I/DD enrolled in HCBS programs annually 				
Hypothesis 4.5 – Following imp among participants. Primary RQ 4.5.d: What is the health insurance status and	lementation of the TennCare III of - See subsidiary questions below.	demonstration, premium requirements for particip - See subsidiary questions below.	ants in Part A of the Katie See subsidiary questions below.	Beckett program will not re - See subsidiary questions below.	duce the likelihood of enro - See subsidiary questions below.	ollment or enrollment continuity
reported change in health						
status among Katie Beckett						
Part A enrollees that were:						
 Suspended from the program due to non-payment of premiums; or Voluntarily separated from the program? 						

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
Subsidiary RQ 4.5.d.i: What is	- Insurance status for Katie	- Not applicable	TennCare Enrollee	- Not applicable	- Descriptive analysis	- N/A
the health insurance status	Beckett Part A enrollees		Survey or Focus			
and reported change in health	who were suspended		Groups (2023,			
status among Katie Beckett			2026, 2029)			
Part A enrollees that were	- Reported health status		TennCare Enrollee	- Enrollees who	- Comparison of	- N/A
suspended from the program	for Katie Beckett Part A		Survey (2023,	remain in	means	
due to non-payment of	enrollees who were		2026, 2029)	Tennessee's Katie		
premiums?	suspended			Beckett program		
			.			
Subsidiary RQ 4.5.d.ii: What	 Insurance status for Katie 	- Not applicable	TennCare Enrollee	- Not applicable	- Descriptive analysis	- N/A
is the health insurance status	Beckett Part A enrollees		Survey or Focus			
and reported change in health	who voluntarily		Groups (2023,			
status among Katie Beckett	separated		2026, 2029)			
Part A enrollees that	- Reported health status		TennCare Enrollee	- Enrollees who	- Comparison of	- N/A
voluntarily separated from	for Katie Beckett Part A		Survey (2023,	remain in	means	
the program?	enrollees who voluntarily		2026, 2029)	Tennessee's Katie		
	separated			Beckett program		

Figure 32: Analytic Table – Goal 5: Manage expenditures at a stable and predictable level, and at a cost that does not exceed what would have been spent in a Medicaid fee-for-service program

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
Hypothesis 5.1 – Following imp	elementation of the TennCare III	demonstration, TennCare expenditures will grow a	at a slower and more sustai	nable rate than the average	national Medicaid expen	ditures.
Primary RQ 5.1.a: Has	- Total TennCare	- Numerator: TennCare expenditures from	- TennCare	- National	- Difference-in-	- Figure 99
TennCare maintained an	expenditure growth rate	the previous year subtracted from	Expenditure Data	benchmarks	differences	
expenditure growth rate that		TennCare expenditures in the current year	(2017-2030)			
is slower than the average		- Denominator: TennCare expenditures from	 Medicaid Budget 			
national Medicaid		the previous year	and Expenditure			
			System (MBES)			
			(2017-2030)			

Research Question	Outcome Measure(s)	Specifications	Data Source(s)	Comparison Group	Analytic Approach	Applicable Figures
expenditure growth rate? ²¹						
Primary RQ 5.1.b: What is the difference between TennCare III's aggregated costs and the PMPM budget neutrality cap, and how does this change over the duration of the demonstration period?	 Total TennCare expenditures vs. PMPM budget neutrality cap 	 Total annual TennCare expenditures subtracted from annual PMPM budget neutrality cap 	- TennCare Expenditure Data (2021-2030)	- Not applicable	- Descriptive analysis	- Figure 100
Primary RQ 5.1.c: What are the administrative operational costs of the demonstration?	 Administrative cost of ongoing demonstration operation 	 Administrative cost of ongoing demonstration operation 	- TennCare Expenditure Data (2021-2030)	- Not applicable	- Descriptive analysis	- Figure 101

²¹ The independent evaluator will consider impacts of the American Rescue Plan, including enhanced Federal Medical Assistance Percentages (FMAP) funds.

D. Methodological Limitations

The following section details the methodological limitations of the TennCare III Evaluation, how said limitations limit causal inferences about the impact of TennCare III program components, and what approaches were taken by the independent evaluator to minimize these limitations. Additionally, the section details roadblocks encountered by the independent evaluator that impacted the execution of the evaluation.

Figure 33 details overarching limitations that impact all demonstration goals, including data limitations encountered during the development of the evaluation report. **Figure 34** provides a detailed breakdown of methodological limitations specific to demonstration goals.

Limitation	Description of Limitation	Approaches to Minimizing Limitation
COVID-19 impact	• Beginning in March 2020, the COVID-19	CYs 2020 and 2021 were removed
	public health emergency spurred significant	from the analytic method baseline
	changes in health care service delivery and	and intervention evaluation periods
	utilization. The public health emergency	when it was inappropriate or
	altered Medicaid enrollment levels, program	impossible to account for the effects
	expenditures, service utilization, and access	of the COVID-19 public health
	to care.	emergency.
	The COVID-19 public health emergency	• The inclusion of any data from CYs
	prevented standard data collection for	2020 and 2021 was carefully
	multiple measures, including the NCI and	analyzed by the independent
	NCI-AD Surveys, which involve in-person	evaluator and supplemented by data
	interviews. Since in-person interviews were	from additional pre-COVID-19 or
	infeasible in MY 2020-2021, NCI and NCI-AD	post-COVID-19 years. Utilization data
	data were not collected for this time period.	from these years was particularly
		scrutinized or avoided due to COVID-
		19-related impacts.
		In cases calling for interrupted time
		series analysis, the independent
		evaluator used a multiple-
		intervention technique to capture
		the effects of the COVID-19 public
		health emergency and TennCare III.
		For difference-in-differences
		analyses with more than two
		observations available, year-fixed
		effects were added to capture time-
		varying effects, like the COVID-19
		public health emergency.
		For some pretest-posttest cases with

Figure 33: Methodological Limitations – Overall

TennCare III Demonstration – 2023 Interim Evaluation Report Independent Evaluator: Guidehouse Inc.

Limitation	Description of Limitation	Approaches to Minimizing Limitation
Limitation Limited number of in-state comparison groups	 In-state comparison groups were infeasible since many of the TennCare III demonstration components impact the entire Medicaid enrollee population. For demonstration components that target specific subgroups, such as the Katie Beckett program population, the unique characteristics of the target population (e.g., children under the age of 18 with complex medical needs or disabilities) also limited the availability of appropriate in-state comparison groups. Certain outcomes were rendered partly attributable to extraneous factors outside of the demonstration due to the inability to identify in-state comparison groups. 	 Approaches to Minimizing Limitation sufficient data, the independent evaluator excluded 2020 and 2021 data from both the baseline and intervention periods. In other cases, only 2020 data was excluded to improve statistical power. Many pretest-posttest analyses will be more robust in future evaluation years. The independent evaluator included out-of-state comparison groups wherever possible. Out-of-state comparison groups were selected for similarity to the TennCare intervention population. However, the use of out-of-state comparison groups was limited (see T-MSIS data limitation described below). The independent evaluator included comparisons to national and regional benchmarks, which provided a valid
Unable to access T- MSIS Data	• The independent evaluator had to change the analytic approach for many RQs due to the lack of access to T-MSIS data.	 regions. For RQs relying on T-MSIS data, the independent evaluator changed the analytic approach from difference-in-differences analysis to interrupted time series, one group pretest-posttest, and descriptive analyses where appropriate. If available, the independent evaluator will re-consider the use of T-MSIS data for future evaluation reports.

Limitation	Description of Limitation	Approaches to Minimizing Limitation
Unable to access certain internal data sources Limited ability to	 Some TennCare data sources were not available in time for the first interim evaluation, while others had to be exported in aggregate (i.e., not at the individual level) for the independent evaluator. Medicaid population demographics and 	 The independent evaluator did not assess certain RQs as a result of the lack of data, as outlined in Section 7. These will be assessed in future evaluation reports. The independent evaluator selected
control for differences in Medicaid populations in other states	other characteristics varied among states. As a result, when using data sources like BRFSS and ACS for out-of-state comparison groups, the independent evaluator had limited ability to control for different characteristics.	out-of-state comparison groups from states with similar Medicaid eligibility requirements, geographic landscapes, and income levels.
Limitations of ITS and one-group pretest- posttest analyses	 The independent evaluator could not access T-MSIS data and leveraged ITS and one-group pretest-posttest analyses in its place. ITS required data for the same time period length before and after the implementation of treatment. This disqualified certain data sources that do not provide a sufficient volume of historical data from being included in the later Interim and Summative Evaluations, given the 10-year length of the TennCare III demonstration. When using longitudinal analytic methods such as ITS and pretest-posttest, the independent evaluator was unable to control for certain changes over time, including economic changes and characteristics of the intervention 	 The independent evaluator interpreted findings as correlations and not causal. The independent evaluator observed population differences over time. In cases where population differences were significant over time, the independent evaluator used regression to address the differences.
Confounding factor: changes in population composition over time	 population. The TennCare population will change and fluctuate in terms of eligibility, enrollee demographics, service utilization, medical needs, and other demographic characteristics throughout the 10-year demonstration period. 	 The independent evaluator reported on appropriate caveats, context, and discussion of data limitations related to the TennCare enrollee population. The independent evaluator assessed demographic changes for the relevant years for the interim report and will continue to monitor in future evaluation reports.
Limitations Retroactive Eligibility	 The number of eligible participants and response rate for surveys targeting 	• The independent evaluator designed the surveys so that it could be

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Limitation	Description of Limitation	Approaches to Minimizing Limitation
and Katie Beckett	individuals not actively enrolled in the Katie	completed in a reasonable amount of
Surveys	Beckett program was low.	time. On average, the surveys took
	• Use of online surveys with access codes	less than 10 minutes to complete.
	negatively impacted the representativeness	• Despite technology literacy concerns,
	and generalizability of the survey data due	online surveys reduced
	to limitations in technology literacy among	administrative burden on enrollees
	the Medicaid population.	and created real-time responses.
	• Using a third-party mailer to distribute	• Appropriate caveats, context, and
	surveys resulted in inconsistencies in access	discussion of data limitations on
	codes, which impacted the independent	response rate and sample size were
	evaluator's ability to analyze the data.	included in the report.
	• Delays in distributing surveys resulted in a	• The independent evaluator analyzed
	shorted timeframe to collect responses and	the data on an aggregate level.
	lowered the response rate.	• The surveys contained retrospective
	• A lower response rate also negatively	questions about enrollee outcomes
	impacted the representativeness and	and perspectives of the
	generalizability of the survey data.	demonstration implementation and
		the years leading up to
		implementation, where applicable.
Limitations in	The independent evaluator could not	The independent evaluator used
isolating the effects	establish a causal relationship between a	regression analysis to control for
of overlapping	singular demonstration component and a	confounding factors where
demonstration	demonstration outcome. Since many	appropriate.
components	TennCare III program components impact	Qualitative analysis and
	the entire TennCare population, multiple	interpretation of quantitative results
	components contributed to a certain	provided context for any potential
	outcome in the intervention population.	overlap in outcomes.
Limitation of DiD	Multiple difference-in-differences analyses	• Comparison to benchmarks offered a
analysis	use national or regional benchmarks (e.g.,	higher level of rigor than if there was
	HEDIS [®] measures). This limited the statistical	no comparison group whatsoever.
	power of the DiD approach and out-of-state	• The independent evaluator
	comparison because the benchmarks were	supplemented comparisons to
	set at an aggregate level (program- or plan-	benchmarks with descriptive
	wide).	analysis, comparison to historical
	• DiD analyses that planned to use T-MSIS	data, and additional context where
	were switched to methods that do not	possible.
	require comparison groups, but also carry	• The independent evaluator used
	weaker interpretations.	techniques such as visual trend
	• DiD analyses using survey data from ACS and	analysis to confirm that the "parallel
	BRFSS contain limited beneficiary-level	trend" assumption is met with the
	,	· · · · · · · · · · · · · · · · · · ·

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Limitation	Description of Limitation	Approaches to Minimizing Limitation
	information, so propensity score matching is impossible.	 selected out-of-state comparison group or national benchmark. In lieu of propensity score matching, the independent evaluator used sampling weights when provided by survey data sources.
Limitation of availability of pre- period data	 For hypotheses and research questions related to policy components that remain unchanged between TennCare II and TennCare III (e.g., CHOICES), the independent evaluator hypothesized that there would not be a significant change in utilization or other outcomes between the two demonstrations. Therefore, the independent evaluator planned to use pre- period data (e.g., prior to TennCare I implementation) to address questions about impacts or changes but had limited access to such data. 	 The independent evaluator interpreted results for research questions related to policy components that remain unchanged between TennCare II and TennCare III as the change in observed trends between TennCare II and TennCare III, as opposed to interpreting as the effect of the original policy implementation.

Figure 34: Methodological Limitations – Goal-Specific

Limitation	Description of Limitation	Approaches to Minimizing Limitation				
Goal 2: Ensure enrolle	Goal 2: Ensure enrollee access to health care, including safety net providers					
Limited ability to isolate the impact of TennCare III on the longstanding retroactive eligibility waiver	 Since the retroactive eligibility waiver has been in place since 1994, the independent evaluator could not isolate the effect of the waiver specifically under TennCare III. When comparing to other states, the independent evaluator could not isolate differences in outcomes due to the impact of the retroactive eligibility waiver since Medicaid programs vary widely in policies and implementation. 	 The independent evaluator included appropriate context regarding retroactive eligibility limitations. The independent evaluator compared Tennessee to similar Medicaid programs using the aforementioned comparison state selection approach. 				
Goal 4: Provide enrolle	ees with appropriate and cost-effective HCBS within	acceptable budgetary parameters				
Limited ability to isolate the impact of TennCare III on the longstanding CHOICES program and I/DD programs	 Since the CHOICES program has existed since 2010, ECF CHOICES since 2016, and 1915c waiver programs since 1987, the independent evaluator could not isolate the effect of TennCare III on each MLTSS program. 	 The independent evaluator included appropriate caveats, context, and discussion of data limitations. 				

TennCare III Demonstration – 2023 Interim Evaluation Report Independent Evaluator: Guidehouse Inc.

E. Results

This section provides observations organized by the five TennCare III demonstration goals and related evaluation hypotheses and research questions.

1. Goal 1: Provide high-quality care to enrollees that will improve health outcomes

The evaluation tested four hypotheses to evaluate whether TennCare III policies have impacted health outcomes. The findings are organized by hypothesis and associated research question.

outcomes for TennCare enrollees will maintain or improve. Primary RQ 1.1.a Has the implementation of TennCare III maintained or improved physical health outcomes for TennCare enrollees? Summary From 2020 to 2021, Tennessee saw a slight increase in the percentage of enrollees who had hypertension and adequately controlled blood pressure and a slight decrease in enrollees who had diabetes and poor HbA1c control. Both of these are positive results, and both metrics moved similarly to the national benchmarks. Analytic Approach The independent evaluator assessed this RQ using two HEDIS measures - Controlling High Blood Pressure and Comprehensive Diabetes Control: HbA1c Poor Control (>9%) - to compare Tennessee to a national benchmark. Results Figure 35 displays the percentage of enrollees 18-85 years old who had a diagnosis of hypertension and had adequately controlled blood pressure. The difference-in-differences estimate, which measures how the metric changed in Tennessee post-TennCare III versus the rest of the country, was 0.925% (p-value = .91). This result indicates that TennCare III was estimated to raise the metric by 0.925% more than the national benchmark in 2021; the effect of TennCare III was estimated to be slightly positive, but the result was statistically nonsignificant. The use of aggregated HEDIS measures and the lack of 2022 HEDIS numbers reduced the statistical power. Additionally, the parallel trends assumption is likely not satisfied. Figure 36 displays the percentage of enrollees 18-75 years old with diabetes who had poor HbA1c control (>9.0%) from 2017 through 2021. Compared to the national average, TennCare enrollees with diabetes have had better HbA1c control over the entire observed period. However, the effect o		wing the implementation of the TennCare III demonstration, quality of care and health
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TennCare III Demonstration – 2023 Interim Evaluation Report Independent Evaluator: Guidehouse Inc.

Figure 35: Controlling High Blood Pressure – Percentage of enrollees 18-85 years old who had a diagnosis of hypertension and had adequately controlled blood pressure, 2017-2021²²

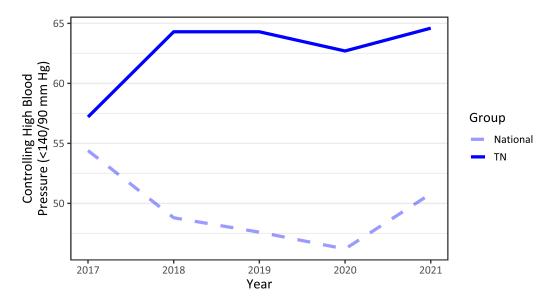
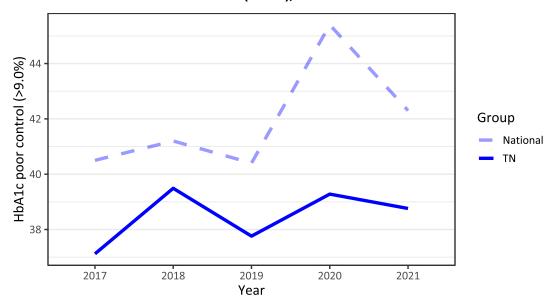


Figure 36: HbA1c Poor Control – Percentage of enrollees 18-75 years old with diabetes who had poor HbA1c control (>9.0%), 2017-2021²³



 $^{\rm 22}$ Guidehouse analysis of NCQA HEDIS measures, 2017-2021

²³ Guidehouse analysis of NCQA HEDIS measures, 2017-2021

TennCare III Demonstration – 2023 Interim Evaluation Report Independent Evaluator: Guidehouse Inc.

Hypothesis 1.1 – Following the implementation of the TennCare III demonstration, quality of care and health outcomes for TennCare enrollees will maintain or improve.

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Primary RQ 1.1.b	Has the implementation of TennCare III maintained or increased the utilization rates of			
	preventive or wellness services for TennCare enrollees?			
Summary	TennCare III has mostly maintained utilization rates of preventive and wellness services for			
	its enrollees. Rates of cervical cancer screening in female enrollees fell while the benchmark			
	rose. Well-child visit rates were stronger than the benchmark in the first 15 months but			
	were weaker (and decreased from 2020 to 2021) in the first 30 months. Child and			
	adolescent well-care visits were stronger than the benchmark but fell from 2020 to 2021.			
	Childhood immunization status has fallen from 2020 to 2021 by half a percentage point			
	while the benchmark fell by about 3 percentage points.			
Analytic Approach	The independent evaluator assessed this RQ by comparing Tennessee to a national			
	benchmark for multiple HEDIS measures including Cervical Cancer Screening (CCS), Well-			
	Care Visit (WCV), and Child Immunization rates (CIS) The independent evaluator reported			
	both a descriptive analysis and the results of a simple difference-in-differences analysis.			
Results	Figure 37 displays the percentage of female enrollees, 21-64 years old, that were screened			
	for cervical cancer between 2017-2021. Compared to the national benchmark, TennCare			
	enrollees are screened less frequently, with a difference-in-differences estimate of -3.37%			
	(p-value = .0083). The difference-in-differences estimate was negative and statistically			
	significant. There is no policy change that suggests that TennCare III's implementation			
	caused a drop in the rate of cervical cancer screening, but this analysis does find that			
	Tennessee's CCS rate fell from 2020 to 2021 while the national benchmark's CCS rate rose.			
	Figure 38 shows the percentages of children who received Well-Child Visits in the First 15			
	Months, Well-Child Visits in the First 30 Months, and Child and Adolescent Well Care Visits			
	(WCVs) in 2020 and 2021. Since data prior to 2020 was unavailable for this evaluation, the			
	independent evaluator was not able to establish parallel trends or assign p-values to			
	difference-in-differences estimates. Tennessee's rate of WCVs in the First 15 Months			
	improved by 7.1 percentage points, compared to 1.2 percentage points for the national			
	benchmark. Tennessee and the benchmark both showed a lower rate of WCVs in the First 30			
	Months – Tennessee's percentage decreased 2.68 percentage points versus the benchmark's			
	5.1 percentage points. Tennessee's percentage for Child and Adolescent WCVs stayed nearly			
	flat with 51.18% and 50.99%, while the national benchmark rose by 3.4 percentage points,			
	indicating greater improvement than Tennessee.			
	Figure 39 displays the trends in child immunization status from 2019 through 2021. Both			
	Tennessee and national benchmark child immunization rates decreased during this time.			
	Tennessee child immunization rates decreased less in 2021 than the national benchmark's,			
	with a difference-in-differences estimate of 1.80% (p-value = .458), though this result does			
	not carry statistical significance or a causal interpretation. In this case, the parallel trends			
	assumption is likely not satisfied. For this and other difference-in-differences analyses, the			
	analysis is strongest when the measure for the benchmark and the group of interest have			

TennCare III Demonstration – 2023 Interim Evaluation Report Independent Evaluator: Guidehouse Inc.

Hypothesis 1.1 – Following the implementation of the TennCare III demonstration, quality of care and health outcomes for TennCare enrollees will maintain or improve.

mostly moved together over time – i.e., their trends are parallel before the intervention
happened. Breaking this assumption of difference-in-differences analysis limits the causal
interpretation of the results.

Figure 37: Cervical Cancer Screening – Percentage of female enrollees 21-64 years old that were screened for cervical cancer, 2017-2021²⁴

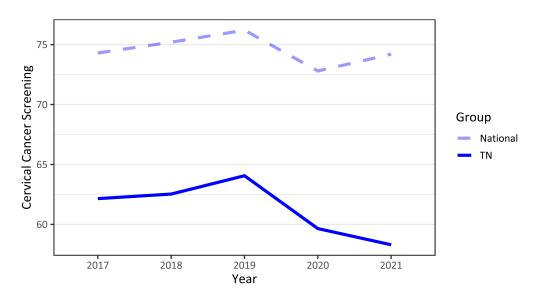


Figure 38: Well-Child and Well-Care Vi	/isit Measures, 2017-2021 ²⁵
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Year	% Well-Child Visits in First 15 Months (vs. Benchmark)	% Well-Child Visits in First 30 Months (vs. Benchmark)	% Child and Adolescent Well-Care Visits (vs. Benchmark)
2020	53.55% (52.90%)	67.69% (71.00%)	51.18% (46.10%)
2021	60.65% (54.10%)	65.01% (65.90%)	50.99% (49.50%)

²⁴ Guidehouse analysis of NCQA HEDIS measures, 2017-2021
 ²⁵ Guidehouse analysis of NCQA HEDIS measures, 2020-2021

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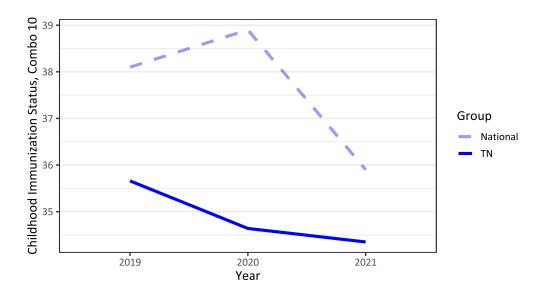


Figure 39: Childhood Immunization Status, Combo 10²⁶, 2017-2021²⁷

Hypothesis 1.1 – Follow	Hypothesis 1.1 – Following the implementation of the TennCare III demonstration, quality of care and health				
outcomes for TennCare	outcomes for TennCare enrollees will maintain or improve.				
Primary RQ 1.1.c	Has the implementation of TennCare III maintained or increased the utilization rates of				
	EPSDT services for TennCare enrollees?				
Summary	TennCare III has mostly maintained utilization rates of EPSDT services for TennCare				
	enrollees. EPSDT participant ratios stayed flat between 2020 and 2021. EPSDT screening				
	ratios fell for some age groups and rose for others, but overall stayed close to national				
	benchmarks.				
Analytic Approach	The independent evaluator assessed this RQ using EPSDT data, reported by Medicaid at				
	state and national levels.				
Results	Figure 40 displays the percentage of eligible enrollees receiving at least one initial or				
	periodic screening from 2017 through 2021. Tennessee performed similarly to the national				
	benchmark, with a difference-in-differences estimate of 0.01% (p-value = .74). The parallel				
	trends assumption was only partially satisfied for this dataset. The independent evaluato				
	specified the difference-in-differences model with and without 2017 data in the dataset to				
	verify if violating the parallel trends assumption affected results but found that omitting				
	2017 data still yielded an insignificant difference-in-differences.				
	Figure 41 and Figure 42 provide a breakdown of the expected versus total number of				
	screenings received for both Tennessee and the national average for each age group. No				
	difference-in-differences estimators returned significant p-values. In general, trends were				

²⁶ Combo 10 definition - number of enrollees 2 years of age who had four diphtheria, tetanus, and acellular pertussis (DTaP); three polio (IPV); one measles, mumps, and rubella (MMR); three haemophilus influenza type B (HiB); three hepatitis B (HepB), one chicken pox (VZV); four pneumococcal conjugate (PCV); one hepatitis A (HepA); two or three rotavirus (RV); and two influenza (flu) vaccines by their second birthday.

²⁷ Guidehouse analysis of NCQA HEDIS measures, 2017-2021

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Hypothesis 1.1 – Following the implementation of the TennCare III demonstration, quality of care and health outcomes for TennCare enrollees will maintain or improve.

	relatively parallel, indicating that Tennessee mostly mirrored national benchmarks.
	Additionally, EPSDT screening ratios indicate that older children have consistently been less
	likely to receive screenings. This finding occurred in Tennessee and the national benchmark.

Figure 40: EPSDT Participant Ratio – Percentage of eligible enrollees receiving at least one initial or periodic screening, 2017-2021²⁸

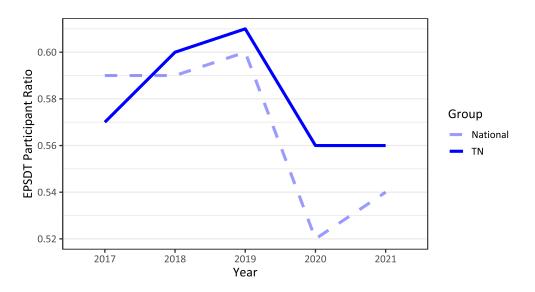


Figure 41: Tennessee EPSDT Screening Ratio – Expected vs. total EPSDT screenings received by eligible enrollees, by age group, 2017-2021²⁹

Year	< 1	1 to 2	3 to 5	6 to 9	10 to 14	15 to 18	19 to 20
2017	1.00	0.91	0.85	0.61	0.61	0.47	0.31
2018	0.98	0.96	0.9	0.65	0.67	0.51	0.34
2019	1.00	0.94	0.93	0.67	0.68	0.53	0.36
2020	0.93	0.85	0.81	0.58	0.58	0.46	0.28
2021	0.97	0.86	0.81	0.56	0.58	0.46	0.26

 $^{^{\}rm 28}$ Guidehouse analysis of state and national EPSDT data, 2017-2021

 $^{^{\}rm 29}$ Guidehouse analysis of state and national EPSDT data, 2017-2021

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Figure 42: National Benchmark EPSDT Screening Ratio – Expected vs. total EPSDT screenings received by eligible enrollees, by age group³⁰

Year	< 1	1 to 2	3 to 5	6 to 9	10 to 14	15 to 18	19 to 20
2017	0.97	0.99	0.8	0.63	0.61	0.51	0.25
2018	0.98	0.96	0.9	0.65	0.67	0.51	0.34
2019	1.00	1.00	0.89	0.65	0.67	0.57	0.31
2020	0.96	0.92	0.75	0.53	0.54	0.47	0.25
2021	0.96	0.89	0.79	0.58	0.59	0.5	0.25

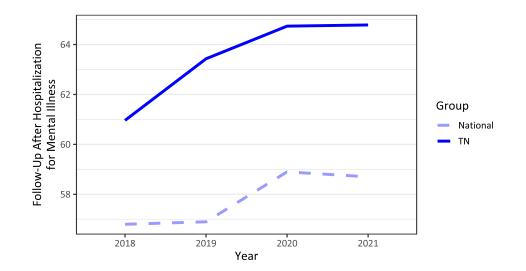
Hypothesis 1.1 – Following the implementation of the TennCare III demonstration, quality of care and health outcomes for TennCare enrollees will maintain or improve.

Primary RQ 1.1.d	Has the implementation of TennCare III maintained or improved the management of BH			
	conditions for TennCare enrollees?			
Summary	TennCare III has maintained the management of BH conditions for its enrollees. The rate of			
	follow-up after hospitalization for mental illness stayed flat from 2020 to 2021 and was still			
	over 5 percentage points higher than the national benchmark.			
Analytic Approach	The evaluator originally intended to evaluate this RQ using two separate measures – Follow-			
	Up After Hospitalization for Mental Illness for Adults and Follow-Up After Hospitalization for			
	Mental Illness for Children. Since NCQA reports these measures as a combined measure, the			
	independent evaluator used a member month weighted average to create a matching single			
	measure.			
Results	Figure 43 displays the trends in percentage of enrollees 6 years and older who had a follow-			
	up visit with a mental health provider within 30 days of hospital discharge for mental illness			
	treatment from 2018 through 2021. Visual inspection indicates that Tennessee has been			
	consistently higher than the national benchmark – on average, Tennessee's measure was			
	5.65 percentage points higher than the national benchmark. The estimated difference-in-			
	differences of 0.57 percentage points (p-value = .722) indicates that the difference between			
	Tennessee and the national benchmark did not change significantly in 2021. Additionally, the			
	parallel trends assumption is likely not satisfied.			

 $^{^{\}rm 30}$ Guidehouse analysis of state and national EPSDT data, 2017-2021

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Figure 43: Follow-Up After Hospitalization for Mental Illness - percentage of enrollees 6 years and older 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 provider within 30 days of discharge, 2017-2021³¹



Hypothesis 1.2 – Following implementation of the TennCare III demonstration, opioid misuse will maintain or
decrease among TennCare enrollees, access to MAT will maintain or increase, and health outcomes associated with
opioid misuse will maintain or improve.

	· · · · · · · · · · · · · · · · · · ·
Primary RQ 1.2.a	Has the implementation of TennCare III maintained or decreased opioid use among
	TennCare enrollees (i.e., first-time, acute, and chronic opioid users)?
Summary	Since the implementation of TennCare III, nearly all metrics related to opioid use and
	prescriptions have maintained or fallen. First-time opioid users has risen slightly, though
	2020 being the last year before implementation likely means that COVID-19 affected the
	baseline number.
Analytic Approach	The independent evaluator assessed this RQ using one-group pretest-posttest analyses. The
	independent evaluator reports the relevant metrics in Figure 44, followed by hypothesis
	testing results, p-values, and effect sizes.
Results	Figure 44 displays metrics related to opioid use from 2017 through 2022, such as first-time
	opioid users, acute opioid users, and chronic opioid users.
	First-time Opioid Users – The number of first-time opioid users decreased from 2017-2020
	but stayed between 38,000 and 42,000 in 2021 and 2022. A chi-square test using 2017-2019
	as the baseline and 2021-2022 as the TennCare III demonstration period returned a near
	zero p-value, supporting the hypothesis that first-time opioid use would decrease during the

³¹ Guidehouse analysis of NCQA HEDIS measures, 2017-2021

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Hypothesis 1.2 – Following implementation of the TennCare III demonstration, opioid misuse will maintain or decrease among TennCare enrollees, access to MAT will maintain or increase, and health outcomes associated with				
opioid misuse will maintain or improve.				
	TennCare III demonstration. The baseline period showed 34.1 first time users per 1,000 enrollees, and the demonstration period showed 22.8 per 1,000 enrollees.			
	Acute Opioid Users –The number of acute opioid users has also decreased from 2017-2020, and then leveled off in 2021 and 2022. A chi-square test using 2017-2019 as the baseline and 2021-2022 as the demonstration period returned a near zero p-value, supporting the hypothesis that acute opioid use would decline during the TennCare III demonstration. The baseline period showed 96.1 acute users per 1,000 enrollees, and the demonstration period showed 64.2 per 1,000 enrollees.			
	Chronic Opioid Users – Unlike the previous metrics, the number of chronic opioid users decreased every year from 2017-2022. A chi-square test using 2017-2019 as the baseline and 2021-2022 as the demonstration period returned a near zero p-value, supporting the hypothesis that chronic opioid use would decline during the demonstration. The baseline period showed 14.98 chronic users per 1,000 enrollees, and the demonstration period showed 5.27 per 1,000.			
	Opioid prescriptions per 1,000 Enrollees – The number of prescriptions per 1,000 enrollees has continued to fall through the demonstration period. A chi-square test using 2017-2019 as the baseline and 2021-2022 as the demonstration period returned a near zero p-value, supporting the hypothesis that this number would fall during the demonstration. The baseline period showed 285 prescriptions per 1,000 enrollees, and the demonstration period showed 124 per 1,000 enrollees.			
	Days' Supply per Prescription – The average days' supply per prescription has fallen slightly over time. A chi-square test using 2017-2019 as the baseline and 2021-2022 as the demonstration period returned a near zero p-value, supporting the hypothesis that this number would fall during the demonstration. The baseline period showed an average of 17.5 days' supply per prescription, and the demonstration period showed an average of 15.1.			

TennCare III Demonstration – 2023 Interim Evaluation Report Independent Evaluator: Guidehouse Inc.

Year	Total Enrollees	First- time Opioid Users	Acute Opioid Users	Chronic Opioid Users	Total Opioid Prescriptions	Days' Supply per Prescription	Opioid Prescriptions per 1,000 Enrollees	Enrollees Receiving an Opioid Prescription
2017	1,712,028	75,855	213,247	31,612	733,443	16.53	428.41	244,859
2018	1,723,682	51,342	144,398	27,239	404,668	19.23	234.77	171,637
2019	1,644,796	46,242	130,999	17,268	309,477	17.53	188.16	148,267
2020	1,682,442	38,134	115,841	12,388	277,732	16.98	165.08	128,229
2021	1,762,925	41,525	117,857	10,606	237,571	15.70	134.76	128,463
2022	1,846,965	40,828	114,053	8,441	210,309	14.52	113.87	122,494

Figure 44: Tennessee Opioid Use Measures (2017 – 2022)³²

Hypothesis 1.2 – Following implementation of the TennCare III demonstration, opioid misuse will maintain or decrease among TennCare enrollees, access to MAT will maintain or increase, and health outcomes associated with opioid misuse will maintain or improve.

The ITS analysis used a linear model and a two-intervention design – one to represent the start of COVID-19 and one to represent the start of TennCare III. The independent evaluator calculated the number of NAS live births per month rather than per year in order to achieve stronger statistical power.ResultsFigure 45 shows the number of NAS live births each month in Tennessee along with a line of best fit from the interrupted time series model. The effects of the COVID-19 parameter are shown clearly where the consistent downward trend temporarily turns upward in early 2020. The coefficient that represents a sudden, one-time shift at the onset of COVID-19 was not significant but is shown as a small drop in March 2020. The difference in slope associated with COVID-19 was estimated at +6.32 (p-value = .0027), which reflects the upward shift in births associated with neonatal abstinence syndrome (NAS). When the TennCare III demonstration begins in January 2021, the trend reverses again – the difference in slope is estimated at -5.99 (p-value .00539), though the one-time shift is insignificant at	opioid misuse will main			
SummarySince TennCare III's implementation, the rate of NAS live births has resumed a negative trend after rising during 2020. The post-implementation trend is very similar to the trend from 2017-2019.Analytic ApproachSince T-MSIS data was unavailable, this RQ was evaluated using TennCare claims and encounter data with an interrupted time series analysis rather than difference-in-difference. The ITS analysis used a linear model and a two-intervention design – one to represent the start of COVID-19 and one to represent the start of TennCare III. The independent evaluator calculated the number of NAS live births per month rather than per year in order to achieve stronger statistical power.ResultsFigure 45 shows the number of NAS live births each month in Tennessee along with a line of best fit from the interrupted time series model. The effects of the COVID-19 parameter are shown clearly where the consistent downward trend temporarily turns upward in early 2020. The coefficient that represents a sudden, one-time shift at the onset of COVID-19 was not significant but is shown as a small drop in March 2020. The difference in slope associated with COVID-19 was estimated at +6.32 (p-value = .0027), which reflects the upward shift in births associated with neonatal abstinence syndrome (NAS). When the TennCare III demonstration begins in January 2021, the trend reverses again – the difference in slope is estimated at -5.99 (p-value .00539), though the one-time shift is insignificant at	Primary RQ 1.2.b	Has the implementation of TennCare III maintained or decreased the number of Neonatal		
trend after rising during 2020. The post-implementation trend is very similar to the trend from 2017-2019.Analytic ApproachSince T-MSIS data was unavailable, this RQ was evaluated using TennCare claims and encounter data with an interrupted time series analysis rather than difference-in-difference. The ITS analysis used a linear model and a two-intervention design – one to represent the start of COVID-19 and one to represent the start of TennCare III. The independent evaluator calculated the number of NAS live births per month rather than per year in order to achieve stronger statistical power.ResultsFigure 45 shows the number of NAS live births each month in Tennessee along with a line of best fit from the interrupted time series model. The effects of the COVID-19 parameter are shown clearly where the consistent downward trend temporarily turns upward in early 2020. The coefficient that represents a sudden, one-time shift at the onset of COVID-19 was not significant but is shown as a small drop in March 2020. The difference in slope associated with COVID-19 was estimated at +6.32 (p-value = .0027), which reflects the upward shift in births associated with neonatal abstinence syndrome (NAS). When the TennCare III demonstration begins in January 2021, the trend reverses again – the difference in slope is estimated at -5.99 (p-value .00539), though the one-time shift is insignificant at		Abstinence Syndrome live births?		
from 2017-2019.Analytic ApproachSince T-MSIS data was unavailable, this RQ was evaluated using TennCare claims and encounter data with an interrupted time series analysis rather than difference-in-difference. The ITS analysis used a linear model and a two-intervention design – one to represent the start of COVID-19 and one to represent the start of TennCare III. The independent evaluator calculated the number of NAS live births per month rather than per year in order to achieve stronger statistical power.ResultsFigure 45 shows the number of NAS live births each month in Tennessee along with a line of best fit from the interrupted time series model. The effects of the COVID-19 parameter are shown clearly where the consistent downward trend temporarily turns upward in early 2020. The coefficient that represents a sudden, one-time shift at the onset of COVID-19 was not significant but is shown as a small drop in March 2020. The difference in slope associated with COVID-19 was estimated at +6.32 (p-value = .0027), which reflects the upward shift in births associated with neonatal abstinence syndrome (NAS). When the TennCare III demonstration begins in January 2021, the trend reverses again – the difference in slope is estimated at -5.99 (p-value .00539), though the one-time shift is insignificant at	Summary	Since TennCare III's implementation, the rate of NAS live births has resumed a negative		
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shown clearly where the consistent downward trend temporarily turns upward in early 2020. The coefficient that represents a sudden, one-time shift at the onset of COVID-19 was not significant but is shown as a small drop in March 2020. The difference in slope associated with COVID-19 was estimated at +6.32 (p-value = .0027), which reflects the upward shift in births associated with neonatal abstinence syndrome (NAS). When the TennCare III demonstration begins in January 2021, the trend reverses again – the difference in slope is estimated at -5.99 (p-value .00539), though the one-time shift is insignificant at	Results	Figure 45 shows the number of NAS live births each month in Tennessee along with a line of		
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		TennCare III demonstration begins in January 2021, the trend reverses again – the difference		
		in slope is estimated at -5.99 (p-value .00539), though the one-time shift is insignificant at		
4.48 (p-value .76). The fact that the COVID-19 and TennCare III parameters nearly mirror		4.48 (p-value .76). The fact that the COVID-19 and TennCare III parameters nearly mirror		
each other means that the post-TennCare III trend is very close to the pre-COVID trend. The		each other means that the post-TennCare III trend is very close to the pre-COVID trend. The		

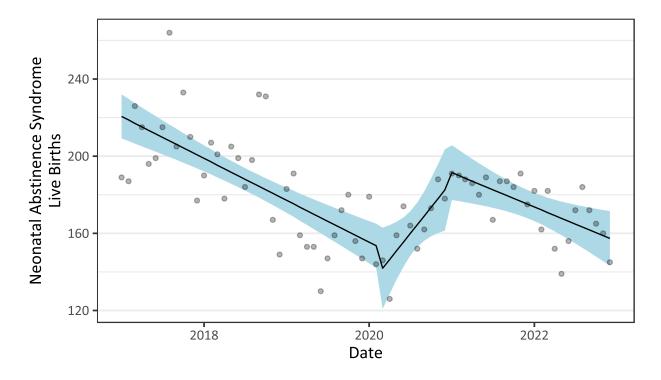
³² Guidehouse analysis of Tennessee Claims and Encounter data, 2017-2022

TennCare III Demonstration – 2023 Interim Evaluation Report Independent Evaluator: Guidehouse Inc.

Hypothesis 1.2 – Following implementation of the TennCare III demonstration, opioid misuse will maintain or
decrease among TennCare enrollees, access to MAT will maintain or increase, and health outcomes associated with
opioid misuse will maintain or improve.

interpretation here is that TennCare III's demonstration was likely not the sole cause of the
trend's reversal. It is unclear exactly how much COVID-19 and the TennCare III
implementation each affected the rate of births associated with NAS, but the data indicates
that the NAS measure is back to maintaining a negative trend.

Figure 45: Interrupted time series model of NAS Live Births in Tennessee each month, 2017-2022³³



Hypothesis 1.2 – Follow	Aypothesis 1.2 – Following implementation of the TennCare III demonstration, opioid misuse will maintain or		
decrease among TennC	TennCare enrollees, access to MAT will maintain or increase, and health outcomes associated with		
opioid misuse will main	opioid misuse will maintain or improve.		
Primary RQ 1.2.c	Has the implementation of TennCare III maintained or improved the rate of OUD treatment		
	for TennCare enrollees?		

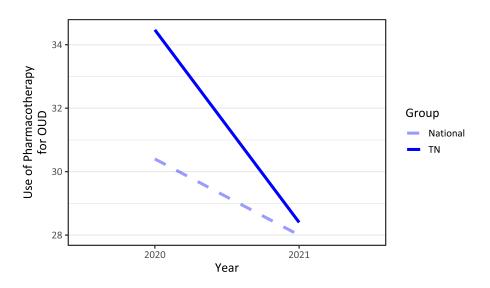
³³ Guidehouse analysis of Tennessee Claims and Encounter Data, 2017-2022

TennCare III Demonstration – 2023 Interim Evaluation Report Independent Evaluator: Guidehouse Inc.

Hypothesis 1.2 – Following implementation of the TennCare III demonstration, opioid misuse will maintain or decrease among TennCare enrollees, access to MAT will maintain or increase, and health outcomes associated with opioid misuse will maintain or improve.

Summary	This item is inconclusive because of a lack of data over time. However, the rate of OUD		
	treatment for enrollees fell sharply from 2020 to 2021. Future evaluation reports will be able		
	to revisit this more effectively.		
Analytic Approach	The independent evaluator assessed this RQ with a difference-in-differences analysis		
	between Tennessee and the national HEDIS benchmark.		
Results	Figure 46 displays the change in use of pharmacotherapy for opioid use disorder from 2020		
	to 2021 for both Tennessee and the national average.		
	Difference-in-differences was -3.67%. Due to the lack of earlier data, it is impossible to verify parallel trends or assign a p-value to estimates. From 2020-2021, Tennessee's rate of use of		
	pharmacotherapy for OUD decreased from 34.47% to 28.4% while the national rate		
	decreased from 30.4% to 28%.		

Figure 46: Use of Pharmacotherapy for OUD – Percentage of enrollees ages 18 to 64 with an OUD who filled a prescription for or were administered or dispensed an FDA-approved medication for the disorder during the MY, 2017-2021³⁴



Hypothesis 1.2 – Following implementation of the TennCare III demonstration, opioid misuse will maintain or decrease among TennCare enrollees, access to MAT will maintain or increase, and health outcomes associated with opioid misuse will maintain or improve.

Primary RQ 1.2.d Has the implementation of TennCare III maintained or improved access to MAT?

³⁴ Guidehouse analysis of NCQA HEDIS measures, 2017-2021

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Hypothesis 1.2 – Following implementation of the TennCare III demonstration, opioid misuse will maintain or decrease among TennCare enrollees, access to MAT will maintain or increase, and health outcomes associated with opioid misuse will maintain or improve.

Summary	Since the implementation of TennCare III, access to MAT has increased.	
Analytic Approach	The independent evaluator analyzed this RQ with a one group pretest-posttest method.	
	Because BESMART started in May 2019, the chi-square test of proportions used 2020 as the	
	pre-intervention period and 2021-2022 as the post-intervention period. 2023 was omitted	
	from testing because the data includes only records up to June 30, 2023.	
Results	BESMART Metrics are shown in Figure 47 . With the mentioned pre- and post-intervention	
	periods, the difference in the proportion of TennCare enrollees who received care through	
	MAT/BESMART before (0.066%) and after (0.08%) TennCare III was significant, with a p-	
	value near 0.	

Figure 47: BESMART Metrics, 2019-2023³⁵

Year	Number of Unique Enrollees who Received Care through MAT/BESMART Program	Number of Unique Providers in The BESMART Program
2019 ³⁶	6,372	Not available
2020	11,056	267
2021	13,643	356
2022	15,296	446
2023 ³⁷	14,658	497

Hypothesis 1.3 – Follow	Hypothesis 1.3 – Following implementation of the TennCare III demonstration, quality outcomes and quality of life		
for TennCare CHOICES a	nd individuals with I/DD will maintain or improve.		
Primary RQ 1.3.a	Has the implementation of TennCare III maintained or improved quality outcomes for		
	CHOICES enrollees?		
Summary	NCI-AD data is incomplete, so comparisons are made between 2017-2018 and 2021.		
	Significantly more enrollees know how to manage their chronic conditions. The percentage		
	whose health was described as having gotten better did not change significantly.		
Analytic Approach	The independent evaluator evaluated this RQ using one-group pretest-posttest methods.		
	The independent evaluator reported results using a table, test statistics, p-values, and effect		
	sizes. Data for these items came from NCI-AD surveys. Because survey data was unavailable		
	for 2019 and 2020, the baseline period is 2017 and 2018, and the demonstration period is		
	2021.		
Results	Figure 48 displays trends for percentage of enrollees who know how to manage their		
	chronic conditions as well as health status improvement for 2017, 2018, and 2021.		

³⁵ Guidehouse analysis of TennCare Provider Enrollment Data, 2019-2023

³⁶ BESMART was instituted in May 2019 as the Enhanced Medication Assisted Treatment (MAT) program and rebranded to BESMART in March 2020. The number of providers in the program in 2019 was unavailable.

³⁷ 2023 BESMART data covers January 1, 2023 – June 30, 2023 due to a 3-month lag for the claims data.

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Hypothesis 1.3 – Following implementation of the TennCare III demonstration, quality outcomes and quality of life for TennCare CHOICES and individuals with I/DD will maintain or improve.

Percentage who know how to manage their chronic conditions – The independent
evaluator conducted a chi-square test with a p-value of .011, so the percentage of
respondents who know how to manage their chronic conditions has improved significantly.
Percentage whose health was described as having gotten better compared to 12 months
ago – The independent evaluator conducted a chi-square test with a p-value of .634, so the
data does not indicate a significant change in this metric.

Figure 48: Selected NCI-AD metrics, 2017, 2018, 2021³⁸

	% Who Know How to Manage Their	% Whose Health was Described as Having
Year	Chronic Conditions (n)	Gotten Better Compared to 12 Months Ago (n)
2017	60% (701)	15% (831)
2018	65% (738)	19% (788)
2021	70% (354)	16% (626)

Hypothesis 1.3 – Following implementation of the TennCare III demonstration, quality outcomes and quality of life		
for TennCare CHOICES a	or TennCare CHOICES and individuals with I/DD will maintain or improve.	
Primary RQ 1.3.c	Has the implementation of TennCare III maintained or improved quality outcomes for	
	individuals with I/DD?	
Summary	Results for this RQ come with significant caveats because of data issues. The items assessed	
	were:	
	Percentage of people who report regularly participating in everyday integrated	
	activities in their communities	
	Percentage of people who report being able to see and/or communicate with their	
	families and friends when they want	
	 Percentage of people who report that staff treat them with respect 	
	Tennessee has generally showed higher quality outcomes for individuals with I/DD than the	
	NCI average, which gives a representative mean of all respondents. The percentage of people	
	reporting regularly participating in everyday activities in their communities and the	
	percentage of people reporting their staff treats them with respect both fell after	
	implementation of TennCare III, but the unusually small dataset for 2022 figures means that	
	more data is needed to make a robust conclusion around quality of care for individuals with	
	I/DD.	
Analytic Approach	Where possible, the independent evaluator assessed this RQ with a difference-in-differences	
	analysis between Tennessee and the NCI weighted average for each item. The NCI-IDD in-	

³⁸ Guidehouse analysis of NCI-AD data, 2017, 2018, 2021

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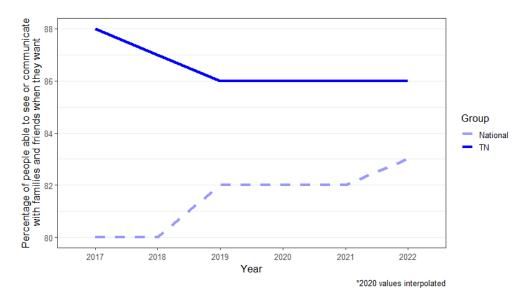
Hypothesis 1.3 – Following implementation of the TennCare III demonstration, quality outcomes and quality of life	
for TennCare CHOICES a	and individuals with I/DD will maintain or improve.
	person survey was interrupted in 2020 due to the COVID-19 public health emergency, so
	2020 values are missing for every item.
	Plots in Figure 50 and Figure 51 use an interpolated value for 2020, but difference-in-
	differences models omitted data for 2020. With a missing year of data just before
	implementation of TennCare III, difference-in-differences estimates are not as reliable and
	should be interpreted with caution. The first item – the percentage of people who report
	regularly participating in everyday integrated activities in their communities – was not
	presented in the 2021-2022 NCI-IDD National Report, so a descriptive analysis is not
	presented and the 2022 NCI average is reported as NA. Additionally, all 2022 survey results
	for Tennessee are derived from raw survey data. Tennessee did collect some data for the
	2021-2022 survey, but NCI determined it was not statistically significant due to sample size
	and response rate. Because of these factors, the 2021-2022 results carry a higher margin of
	error than the results for 2017-2019 and may be less reliable.
Results	Figure 49 shows the values over time for the Community Inclusion Scale included in the NCI-
	IDD survey results. Since 2020, both Tennessee and the NCI average have fallen. This
	measure was likely affected by the COVID-19 public health emergency, and Tennessee's value
	was less affected than the NCI average. More data from future years will be key in obtaining
	more conclusive results.
	Figure 50 shows values over time for an NCI-IDD item concerning what percentage of people
	can contact family and friends when they want. Tennessee consistently showed higher values
	for this survey question than the NCI average. Because Tennessee's and the national
	benchmark's figures were not trending the same direction before TennCare III's
	implementation, the parallel trend assumption did not hold for this metric. The difference-in-
	differences (-2.83 percentage points) was not significant and likely is unreliable because of
	the broken parallel trend assumption. Visual inspection shows that Tennessee's performance
	has remained at 86% since 2019, well above the 2022 NCI average of 83%. Figure 51 below
	shows values over time for an NCI-IDD item concerning what percentage of reported that
	their staff treat them with respect. From 2017-2021, Tennessee showed higher values for this
	survey question than the NCI average. In 2022, which used the smaller sample, Tennessee's
	percentage dropped from 97% to 91%, which was lower than the NCI average for the first
	time in the study period. Because Tennessee's and the national benchmark's figures were not
	trending the same direction before TennCare III's implementation, the parallel trend
	assumption did not hold for this metric and the difference-in-differences estimate (-4.5
	percentage points) is not reliable.

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Figure 49: Percentage of people who report regularly participating in everyday integrated activities in their communities, 2017-2019 and 2021-2022³⁹

Year	Tennessee	NCI Weighted Average
2017	90%	85%
2018	85%	84%
2019	82%	85%
2020	NA	NA
2021	76%	59%
2022	75%	NA

Figure 50: Percentage of people who report being able to see and/or communicate with their families and friends when they want, 2017-2022⁴⁰



 ³⁹ Guidehouse analysis of NCI survey data, 2017-2022
 ⁴⁰ Guidehouse analysis of NCI survey data, 2017-2022

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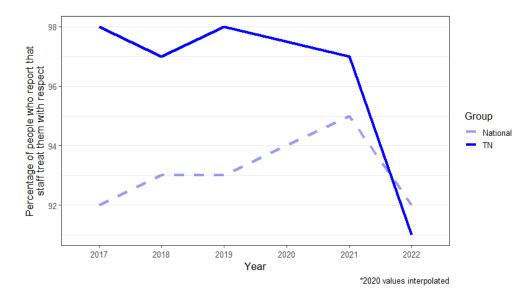


Figure 51: Percentage of people who report that staff treat them with respect, 2017-2022⁴¹

Hypothesis 1.3 – Following implementation of the TennCare III demonstration, quality outcomes and quality of life for TennCare CHOICES and individuals with I/DD will maintain or improve.		
Primary RQ 1.3.d	Has the implementation of TennCare III maintained or improved quality of life for individuals with I/DD?	
Summary	 Most survey items related to personal choice and quality of life stayed flat or declined from 2017-2022. The items assessed were: Percentage of people who report that they chose or had some input in choosing their residence Percentage of people who report that they chose or had some input in choosing their work, Percentage of people who report that they chose or had some input in choosing their day activity Percentage of people who report that they chose or had some input in choosing their staff, Percentage of people who report that they chose or had some input in choosing their room/housemates Percentage of people who report that they chose or had some input in choosing their room/housemates Percentage of people who report that they decided or had help deciding their daily schedule Percentage of people who report that they decided or had help deciding how to spend money Percentage of people who report that they decided or had help deciding how to spend free time 	

⁴¹ Guidehouse analysis of NCI survey data, 2017-2022

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Hypothesis 1.3 – Follow	ing implementation of the TennCare III demonstration, quality outcomes and quality of life	
for TennCare CHOICES and individuals with I/DD will maintain or improve.		
Percentage of people who report that they always have a way to get places when		
	they need to go somewhere	
	Because of the lack of 2020 data, other potential effects of the COVID-19 public health	
	emergency, and the smaller survey sample used by Tennessee in 2022, the data limitations	
	are significant enough that further NCI survey data is required before this RQ can be	
	confidently answered.	
Analytic Approach	Similarly to RQ 1.3.c, the independent evaluator assessed this RQ with a difference-in-	
	differences analysis between Tennessee and the NCI weighted average for each item.	
	Because of lacking data availability, 2020 is missing for every item. Plots in Figures 51-59 use	
	an interpolated value for 2020, but difference-in-differences models omitted data for 2020.	
	With a missing year of data just before implementation of TennCare III, difference-in-	
	differences estimates are not as reliable and should be interpreted with caution.	
	Additionally, all 2022 numbers for Tennessee are derived from raw survey data. Tennessee's	
	2021-2022 survey was not deemed statistically significant and featured smaller samples than	
	usual, so the 2021-2022 results carry a higher margin of error and are less reliable than the	
	results for 2017-2019.	
Desulte		
Results	Figure 52 shows the percentage of surveyed enrollees who reported they helped choose	
	where they live. For 2017-2022, enrollees with I/DD in Tennessee reported having more	
	choice of residence to enrollees with I/DD compared to the NCI average. The percentage of	
	people who report they chose or had some input in choosing their residence has fallen	
	slightly in recent years but has remained around 5 percentage points higher than the	
	national rate. The difference-in-differences (-3.67 percentage points) was not significant and	
	the parallel trends assumption was not met, so the independent evaluator does not find that	
	the implementation of TennCare III significantly impacted this measure.	
	Figure 53 shows results for the survey item asking respondents if they had input in choosing	
	their work. The national benchmark was volatile from 2017-2022, so the parallel trend	
	assumption is broken. Tennessee's rate has slowly decreased from 91% to 86%, but this	
	change started well before the implementation of TennCare III in 2021. More post-	
	implementation data will provide a stronger comparison, though the parallel trends	
	assumption is not met in the baseline data.	
	Figure 54 displays the percentage of respondents who had input in their day activity, which	
	captures choice in activities other than employment or day programs. The difference-in-	
	differences (-8.17 percentage points) was not significant and the parallel trends assumption	
	was not met. Future data will likely make analysis of this item stronger, especially with the	
	sudden observed drop in 2022, when the smaller dataset was used. Although Tennessee's	
	rate has decreased since 2017, Tennessee has maintained a rate higher than the national	
	benchmark other than in 2022.	

TennCare III Demonstration – 2023 Interim Evaluation Report Independent Evaluator: Guidehouse Inc.

 Following implementation of the TennCare III demonstration, quality outcomes and quality of life HOICES and individuals with I/DD will maintain or improve.
Figure 55 shows the percentage of respondents who had input in choosing their staff.
Tennessee has remained higher than the national benchmark but has also seen its rate drop every year since 2017. This trend began before TennCare III, and further data is needed to
assess if the negative trend continues. The difference-in-differences was significant at -14.83
percentage points and a p-value of .025. However, the parallel trends assumption was
broken – Tennessee's figure has fallen every year, while the NCI average has risen and fallen
each year and stayed flat overall. Because of the violated assumption, the difference-in-
differences estimate is not reliable.
Figure 56 shows the percentage of respondents who had input in choosing their
room/housemates over time. The difference-in-differences (-2.17 percentage points) was
not significant, as both the national and Tennessee rates have stayed mostly flat from 2019
on.
Figure 57 shows the percentage of respondents reporting they decided (or had help
deciding) their daily schedule. The parallel trend assumption is broken for this item.
Tennessee saw a significant increase from 2018 to 2019 but the rate began decreasing after
2019. In 2021 and 2022, Tennessee's rate fell below the national benchmark.
Figure 58 displays the percentage of respondents who decided or had help deciding how to
spend money. Again, the parallel trends assumption is broken, so this item is interpreted
descriptively. Similarly to the previous item addressing decisions around daily schedules,
Tennessee's rate increased from 2017 to 2019 before decreasing. In 2022, Tennessee's rate tied with the national benchmark at 90%.
Figure 59 displays results from the survey item asking respondents about how they decide
how to spend free time. The parallel trend assumption is broken so difference-in-differences
analysis is omitted. Tennessee's rate remained at 96% from 2017 to 2019. Tennessee's rate
fell to 91% in 2021, then to 87% in 2022 with the smaller survey sample. The national
benchmark slowly improved over the same time period, with a rate of 95% in 2022.
Figure 60 displays the percentage of respondents who reported they always have a way to
get where they need to go. Between 2017-2021, Tennessee's rate stayed at 97% or 98% and
the national benchmark stayed at 93%. Tennessee's rate dropped to 92% in 2022, which
may be an artifact of the smaller sample used for 2022. Further data is needed to confirm a
post-implementation trend.

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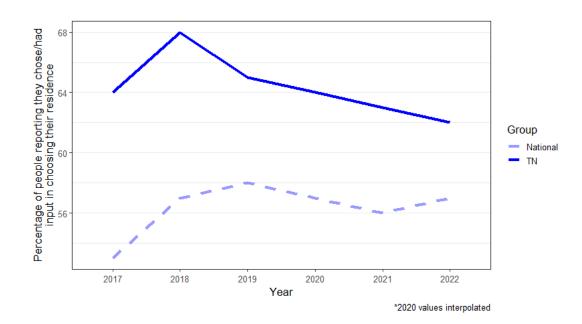
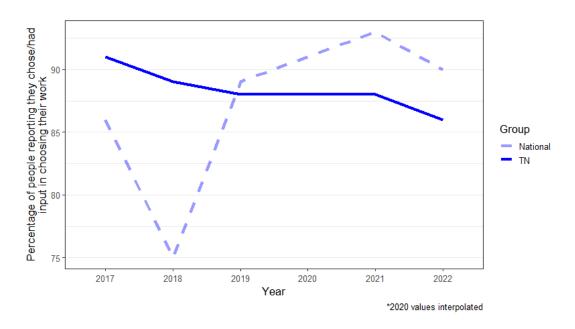


Figure 52: Percentage of people who report that they chose or had some input in choosing their residence, 2017-2022⁴²

Figure 53: Percentage of people who report that they chose or had some input in choosing their work, 2017-2022⁴³



⁴² Guidehouse analysis of NCI survey data, 2017-2022
 ⁴³ Guidehouse analysis of NCI survey data, 2017-2022

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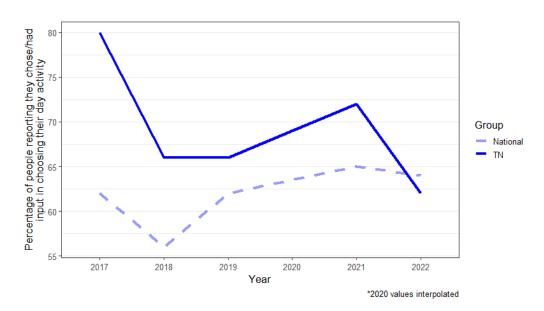
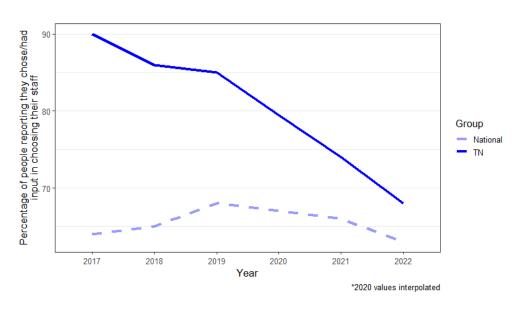


Figure 54: Percentage of people who report that they chose or had some input in choosing their day activity, 2017-2022⁴⁴

Figure 55: Percentage of people who report that they chose or had some input in choosing their staff, 2017-2022⁴⁵

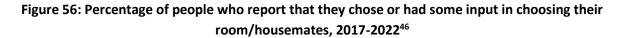


⁴⁴ Guidehouse analysis of NCI survey data, 2017-2022
 ⁴⁵ Guidehouse analysis of NCI survey data, 2017-2022

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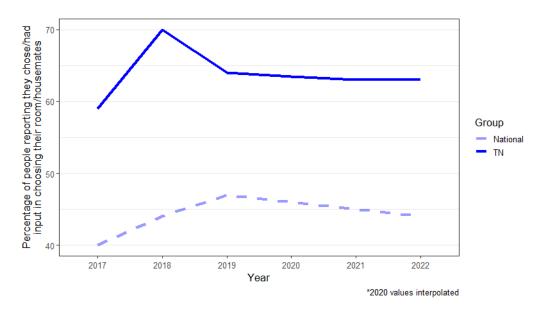
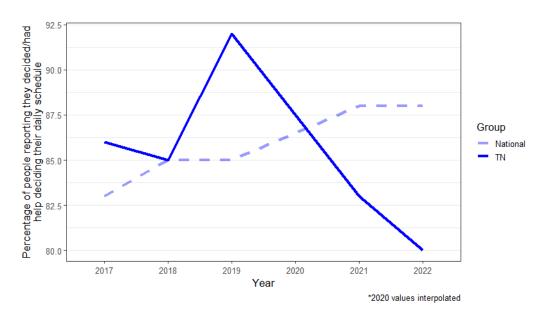
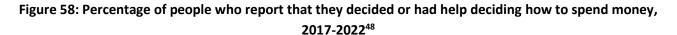


Figure 57: Percentage of people who report that they decided or had help deciding their daily schedule, 2017-2022⁴⁷



 $^{\rm 46}$ Guidehouse analysis of NCI survey data, 2017-2022 $^{\rm 47}$ Guidehouse analysis of NCI survey data, 2017-2022

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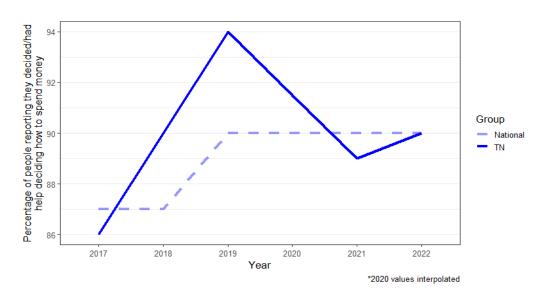
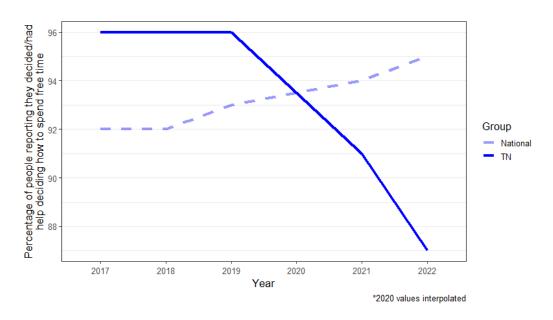


Figure 59: Percentage of people who report that they decided or had help deciding how to spend free time, 2017-2022⁴⁹



⁴⁸ Guidehouse analysis of NCI survey data, 2017-2022
 ⁴⁹ Guidehouse analysis of NCI survey data, 2017-2022

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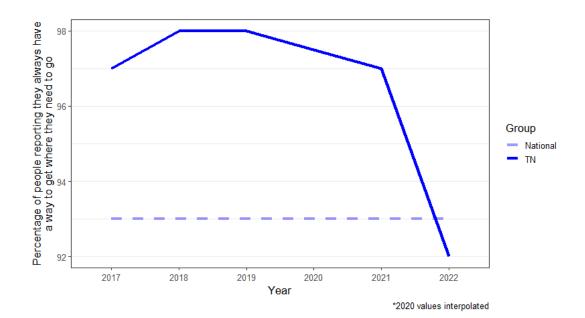


Figure 60: Percentage of people who report that they always have a way to get places when they need to go somewhere, 2017-2022⁵⁰

2. Goal 2: Ensure enrollee access to health care, including safety new providers

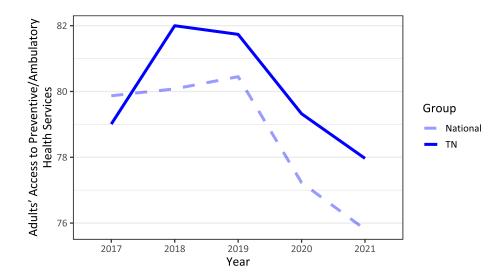
The evaluation tested ten hypotheses to evaluate whether TennCare III policies have impacted enrollees' access to health care. Outlined below are each hypothesis, subsequent research questions, and the analysis for each.

Hypothesis 2.1 – Following implementation of the TennCare III demonstration, enrollee utilization of services will		
maintain or improve.	naintain or improve.	
Primary RQ 2.1.a	Has the implementation of TennCare III maintained or improved enrollee utilization of	
	services?	
Subsidiary RQ 2.1.a.i	Has the implementation of TennCare III maintained or improved utilization of primary care?	
Summary	From 2020 to 2021, access to preventive/ambulatory health services decreased in	
	Tennessee. This decrease was roughly parallel with the national benchmark's decrease.	
Analytic Approach	The independent evaluator assessed this RQ with a difference-in-differences analysis	
	between Tennessee and the NCQA HEDIS national benchmark.	
Results	Figure 61 shows the trend in adult use of primary care from 2017 through 2021. Difference-	
	in-differences was 1.05 percentage points (p-value = .54), though estimates may be biased	
	by the lack of parallel trends. Visual inspection indicates that Tennessee has featured higher	
	utilization of preventive/ambulatory services than the national benchmark every year after	
	2017, and the TennCare III demonstration has likely not impacted that.	

⁵⁰ Source: Guidehouse analysis of NCI survey data, 2017-2022

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Figure 61: Adults' Access to Preventive / Ambulatory Health Services – Percentage of enrollees 20 years and older who had one or more ambulatory or preventive care visit during the measurement year, 2017-2021⁵¹



Hypothesis 2.1 – Following implementation of the TennCare III demonstration, enrollee utilization of services will maintain or improve.		
Primary RQ 2.1.a	Has the implementation of TennCare III maintained or improved enrollee utilization of	
	services?	
Subsidiary RQ 2.1.a.ii	Has the implementation of TennCare III maintained or improved utilization of inpatient	
	care?	
Summary	Utilization of inpatient care, measured as discharges per 1,000 member months, has	
	maintained between 6.21 and 6.56 from 2017 to 2021.	
Analytic Approach	The independent evaluator originally intended to evaluate this RQ using a difference-in-	
	differences analysis, but the HEDIS measure titled "Inpatient Discharges per 1,000 Member	
	Months" had been discontinued. Instead, the independent evaluator used a one-group	
	pretest-posttest method since TennCare had the same metric available in reports from	
	2017-2021.	
Results	Figure 62 shows inpatient discharges per 1,000 member months between 2017 through	
	2021. Since this data was reported separately for each MCO, the independent evaluator	
	computed a member month weighted average. 2017-2019 was the baseline period, and	
	2021 was the demonstration period. The chi-square test does return a low p-value (near 0),	
	but the large number of total member months and low effect size (Cramer's V = .0017)	
	indicate that the chi-square test was likely overpowered. This metric has been mostly stable	
	in the last several years, always staying between 6.56 and 6.21 inpatient discharges per	
	1,000 member months.	

⁵¹ Guidehouse analysis of NCQA HEDIS measures, 2017-2021

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Figure 62: Total Inpatien	t – Inpatient Discharges per 1,000 Member Months, 2017-2021 ⁵²

	Inpatient Discharges per
Year	1,000 Member Months
2017	6.54877
2018	6.352736
2019	6.564154
2020	6.211424
2021	6.287437

Hypothesis 2.1 – Following implementation of the TennCare III demonstration, enrollee utilization of services	
	maintain or improve.

	•	
Primary RQ 2.1.a	Has the implementation of TennCare III maintained or improved enrollee utilization of	
	services?	
Subsidiary RQ 2.1.a.iii	Has the implementation of TennCare III maintained or improved utilization of BH treatment?	
Summary More data from later years will create a stronger result, but this evaluation		
	utilization of BH treatment has mostly maintained since the implementation of TennCare III.	
Analytic Approach	The evaluator originally intended to assess this RQ with a difference-in-differences analysis,	
	but the HEDIS measure titled "Mental Health Utilization – Services per 1,000 Member	
	Months" has since been discontinued. Instead, the independent evaluator used a one-group	
	pretest-posttest method since TennCare had the metric available in reports covering 2017-	
	2021. Since this data was reported separately for each MCO, the independent evaluator	
	computed a member month weighted average. 2017-2019 was the baseline period, and	
	2021 was the demonstration period.	
Results	Figure 63 shows mental health utilization between 2017 through 2021. The chi-square test	
	does return a low p-value (near 0), but the large number of total member months and very	
	low effect size (.0058) indicate that this is not a significant result. This metric has been fairly	
	stable in the last several years.	

Figure 63: Mental Health Utilization - Services per 1,000 Member Months, 2017-2021⁵³

Year	Services per 1,000 Member Months
2017	12.29875
2018	12.56058
2019	11.89358
2020	12.44609
2021	11.97365

⁵² Guidehouse analysis of NCQA HEDIS measures, 2017-2021
 ⁵³ Guidehouse analysis of NCQA HEDIS measures, 2017-2021

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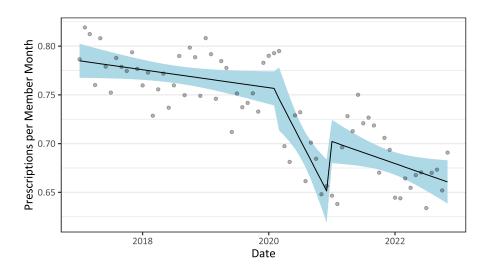
Hypothesis 2.1 – Following implementation of the TennCare III demonstration, enrollee utilization of services will		
maintain or improve.		
Primary RQ 2.1.a	Has the implementation of TennCare III maintained or improved enrollee utilization of	
	services?	
Subsidiary RQ 2.1.a.iv	Has the implementation of TennCare III maintained or improved utilization of outpatient	
	prescription drugs?	
Summary	Utilization of outpatient prescriptions has been slowly declining since 2017, and this trend	
	continued after TennCare III's implementation. Prescriptions per member month utilizing	
	prescription services stayed flat from 2017-2019 but have continued on a downward trend	
	since COVID. Having further post-implementation data will make this a stronger result.	
	Overall, it does not appear that TennCare III's implementation has maintained utilization of	
	prescriptions.	
Analytic Approach	The evaluator originally intended to address this RQ with a difference-in-differences	
	analysis, but since T-MSIS data was unavailable, the independent evaluator proceeded with	
	an interrupted time series analysis. Both metrics - prescriptions per overall member month	
	and prescriptions per member utilizing prescription services – showed seasonality, meaning	
	that there was a recurring pattern each year. Both metrics were adjusted for this seasonality	
	using a classical moving average decomposition before modeling.	
Results	Figure 64 shows prescriptions per month between 2018 through 2022. The effects of the	
	COVID-19 parameter are shown clearly where the original downward trend becomes	
	significantly steeper in early 2020. The level shift component of the COVID-19 intervention	
	term was not significant. The difference in slope associated with COVID-19 was estimat	
	-0.0097 (p-value = .0027), which reflects the downward turn in prescriptions per MM in	
	2020. When the TennCare III demonstration begins in January 2021, the trend changes again	
	– the difference in slope is estimated at +0.0086 (p-value .0093), and the difference in level	
	is significant at .061 (p-value .0076). Like the previous interrupted time series showed, the	
	beginning of 2021 saw a return to a trend that was more like the pre-COVID trend than the	
	2020 trend. The interpretation here is that TennCare III's demonstration was likely not the	
	sole cause of the trend's shifting back. Two effects in 2021 may have helped the trend	
	revert: recovery from the initial shock of COVID-19 and the implementation of TennCare III.	
	Overall, the data indicates that prescriptions per member month have been on a slight	
	negative trend that accelerated during the height of COVID and decreased after 2020.	
	negative trend that accelerated during the neight of COVID and decreased arter 2020.	
	Figure 65 shows the trend in prescriptions per member month utilizing prescription services	
	between 2018 and 2022. The effects of the COVID-19 parameter are shown clearly where	
	the slight upward trend becomes negative in early 2020. The level shift component of the	
	COVID-19 intervention term was significant at .087 (p-value = .0013). The difference in slope	
	associated with COVID-19 was estimated at -0.023 (p-value near 0), which reflects the	
	downward turn the series takes. When the TennCare III demonstration begins in January	
	2021, the trend changes slightly – the difference in slope is estimated at +0.009 (p-value	
	.0399), and the difference in level is not significant at -0.027 (p-value .366). Interpreting this	
	analysis as prescriptions per person that used prescriptions in a given month, we see that	
	anarysis as prescriptions per person that used prescriptions in a given month, we see that	

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Hypothesis 2.1 – Following implementation of the TennCare III demonstration, enrollee utilization of services will		
maintain or improve.		
	this number was trending very slightly upward and has dropped quickly since COVID-19	
	began. The beginning of TennCare III had a slight positive effect on the trend, but it is still	
	downward from 2021-2022. Now, we see that for the average person receiving a	
	prescription, they are receiving slightly above 2.4 prescriptions by the end of 2022,	
	compared to more than 2.8 in 2017, 2018, and 2019.	

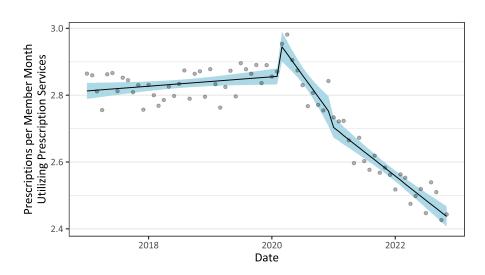
Figure 64: Interrupted Time Series Model – Prescriptions per Member Month, 2017-2022⁵⁴



⁵⁴ Guidehouse analysis of Tennessee Prescription Claims, 2017-2022

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Figure 65: Interrupted Time Series Model – Prescriptions per Member Month Utilizing Prescription Services⁵⁵



Hypothesis 2.2 – Following implementation of the TennCare III demonstration, access to comprehensive primary		
care will maintain or increase.		
Primary RQ 2.2.a	Has the implementation of TennCare III maintained or increased the number and proportion	
	of TennCare enrollees cared for through the PCMH model?	
Summary	The number and proportions of TennCare enrollees cared for through the PCMH model has	
	increased since TennCare III's implementation.	
Analytic Approach	Figure 66 shows the number and overall percentage of TennCare enrollees that received	
	care from PCMHs each year. The independent evaluator conducted a chi-square test using	
	2017-2019 as the baseline and 2021-2022 as the intervention.	
Results	A chi-square test using 2017-2019 as the baseline and 2021-2022 as the intervention period	
	indicated that the percentage of enrollees cared for through PCMHS has increased	
	significantly. The overall proportion from 2017-2019 was 23.9%, and the proportion since	
	2021 is 42.6%. The p-value for the chi-square test was near 0, and the effect size was 0.26,	
	indicating a significant difference.	

Figure 66: Number and proportion of TennCare enrollees in PCMHs⁵⁶

Year	Number of Enrollees in PCMHs	Percentage of Enrollees in PCMHs
2017	194,912	11.38%
2018	213,625	12.39%
2019	542,389	32.98%
2020	631,973	37.56%

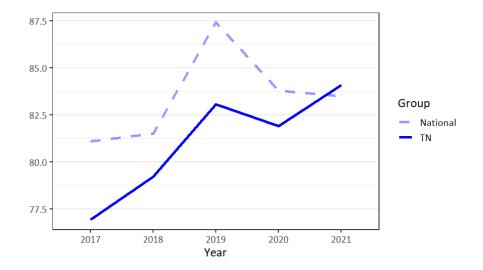
⁵⁵ Guidehouse analysis of Tennessee Prescription Claims, 2017-2022
 ⁵⁶ Guidehouse analysis of TennCare PCMH Enrollment Data, 2017-2022

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Year	Number of Enrollees in PCMHs	Percentage of Enrollees in PCMHs
2021	732,627	41.56%
2022	806,725	43.68%

Hypothesis 2.3 – Following implementation of the TennCare III demonstration, member engagement in prenatal		
and postpartum care will maintain or increase.		
Primary RQ 2.3.a	Has the implementation of TennCare III maintained or increased member engagement in	
	prenatal care?	
Summary	Has the implementation of TennCare III maintained or increased member engagement in	
	prenatal care?	
Analytic Approach	The independent evaluator assessed this RQ with a difference-in-differences analysis	
	between Tennessee and the NCQA HEDIS national benchmark.	
Results	Figure 67 shows Tennessee and the national benchmark's percentage of deliveries with	
	qualifying prenatal care visits each year. The difference-in-differences estimate was 3.74	
	percentage points (p-value = .078), meaning that from 2020-2021, TennCare's percentage of	
	deliveries receiving timely prenatal care rose by 3.74 percentage points relative to the	
	national benchmark. Visual inspection indicates that Tennessee has generally had a lower	
	percentage of deliveries with a prenatal care visit than the national benchmark since 2017,	
	but that Tennessee significantly improved relative to the national benchmark in 2021. The	
	result for this report is nonsignificant, but trends in this metric will be worth watching in	
	future evaluation years.	

Figure 67: Timeliness of Prenatal Care – Percentage of deliveries that received a prenatal care visit in the first trimester, on or before the enrollment start date or within 42 days of enrollment in the organization.⁵⁷



Hypothesis 2.3 – Follo	Hypothesis 2.3 – Following implementation of the TennCare III demonstration, member engagement in prenatal		
and postpartum care will maintain or increase.			
Primary RQ 2.3.a	Has the implementation of TennCare III maintained or increased member engagement in		
	postpartum care?		
Summary	The overall percentage of deliveries with a postpartum visit has increased since		
	implementation. The percentage of women that received long-acting reversible		
	contraception or most/moderately effective contraception dropped for women aged 15-20		
	and stayed flat for women aged 21-44. Postpartum depression screenings were down in		
	2021 and 2022 compared to past years.		
Analytic Approach	The independent evaluator assessed this RQ with several one group pretest-posttest		
	analyses. Included areas of analysis are Postpartum Care, Contraceptive Care Postpartum,		
	and Screening for Postpartum Depression. For all metrics, baseline period is 2017-2019 and		
	demonstration period is 2021-2022.		
Results	Figure 68 shows the percentage of deliveries with a post-partum visit from 2017-2021. The		
	chi-square test returns a low p-value (near 0). The percentage of deliveries with postpartum		
	visits has risen slowly over time from 22.52% in 2017 to 24.92% in 2019 and accelerated in		
	2021 and 2022, rising from 28.45% to 33.59% in one year. The analysis structure does not		
	allow for a causal interpretation but does find a significant difference pre- and post-		
	implementation of TennCare III.		

⁵⁷ Guidehouse analysis of NCQA HEDIS measure, 2017-2021

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Hypothesis 2.3 – Following implementation of the TennCare III demonstration, member engagement in prenatal		
and postpartum care will maintain or increase.		
	Figure 69 shows the contraceptive care postpartum for women 15-20 and 21-44 receiving long-acting revisable method of contraception, from 2017 through 2022. Percentage receiving LARCs, ages 15-20: A chi-square test indicated that this percentage has fallen significantly (p-value near 0) from previous year. 2021 presents as a major outlier, which likely affected this result for this test. Future evaluations with more data after the implementation of TennCare III will likely be more robust to the effects of single years.	
	Percentage receiving LARCs, ages 21-44: A chi-square test indicated that this percentage has not changed significantly between baseline and demonstration periods. The p-value was estimated at nearly 1.	
	Figure 70 shows the percentage of women 15-20 and 21-44 receiving an effective method of contraception within 3 and 60 days of delivery, from 2017 through 2022.	
	Percentage receiving MoMs, ages 15-20: A chi-square test indicated that this percentage has fallen significantly (p-value near 0) from previous years, though the effect size is small at .044. Similarly to the LARC metric, 2021 presents as an outlier from other years and was the lowest of all observed years at 13.2%.	
	Percentage receiving MoMs, ages 21-44: A chi-square test indicated that this percentage has not changed significantly (p = .32) between baseline and demonstration periods.	
	Figure 71 shows percentage of enrollees 18 years and older screened for postpartum depression between 2017 and 2022. A chi-square test shows that the percentage screened for postpartum depression fell significantly from the demonstration period with a p-value near 0. The trend for this metric was unusual and should be watched in future evaluations – it may recover toward its 2019 peak in future years, so more data will give a better sense of its trend since the implementation of TennCare III.	

Figure 68: Postpartum Care - Percentage of deliveries that had a postpartum visit on or between 7 and 84 days after delivery⁵⁸

	Percentage of Deliveries with	
Year	Postpartum Visit	
2017	22.52%	
2018	22.30%	
2019	24.92%	

 $^{\rm 58}$ Guidehouse analysis of Tennessee Claims and Encounter Data, 2017-2022

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	Percentage of Deliveries with	
Year	Postpartum Visit	
2020	25.74%	
2021	28.45%	
2022	33.59%	

Figure 69: Contraceptive Care Postpartum – Percentage of women who had a live birth and were provided a long-acting reversible method of contraception (LARC) within 3 and 60 days of delivery⁵⁹

Year	Percentage Receiving LARC – ages 15-20	Percentage Receiving LARC – ages 21-44
2017	10.75	7.43
2018	10.20	6.86
2019	9.97	7.88
2020	9.32	7.78
2021	7.35	7.15
2022	8.61	7.66

Figure 70: Contraceptive Care Postpartum – Percentage of women who had a live birth and were provided a most effective or moderately effective method of contraception within 3 and 60 days of delivery⁶⁰

Year	Percentage Receiving MoM – ages 15-20	Percentage Receiving MoM – ages 21-44
2017	17.57%	13.21%
2018	16.63%	12.51%
2019	16.67%	13.64%
2020	15.94%	13.38%
2021	13.20%	12.73%
2022	14.27%	13.20%

Figure 71: Screening for Postpartum Depression – Percentage of enrollees, ages 18 years and older, screened for postpartum depression on the date of the encounter or up to 14 days prior to the date of the encounter using an age-appropriate standardized tool⁶¹

Year	Percentage Screened	
2017	6.88%	
2018	8.68%	
2019	10.60%	
2020	8.98%	
2021	7.29%	

⁵⁹ Guidehouse analysis of Tennessee Claims and Encounter Data, 2017-2022

⁶⁰ Guidehouse analysis of Tennessee Claims and Encounter Data, 2017-2022

 $^{\rm 61}$ Guidehouse analysis of Tennessee Claims and Encounter Data, 2017-2022

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Year	Percentage Screened	
2022	7.22%	

Note: This measure was intended to only count encounters that also included a follow-up plan if positive. Due to data availability, the independent evaluator was not able to include this aspect of the measure, so the percentages reported here are likely slightly higher than the intended measure would show.

Hypothesis 2.4 – Following implementation of the TennCare III demonstration, MCOs will encourage and/or		
facilitate the identification of non-medical needs affecting enrollees' health and the referral of enrollees to		
resources.		
Primary RQ 2.4.a	What strategies did the MCOs implement to address non-medical needs affecting enrollees'	
	health?	
Summary	TennCare and its MCO partner through its Health Starts program to address enrollees' non-	
	medical needs. MCOs leverage Community-Based Organizations (CBOs) to support screening	
	and follow-up efforts with enrollees.	
Analytic Approach	Key informant interviews with representatives from TennCare MCOs.	
Results	See below for details.	

Soon after the launch of TennCare III in early 2021, TennCare coordinated with its three MCOs to establish the Health Starts program in April 2021. The program is designed to screen TennCare enrollees for social determinants of health (SDOH) to identify needs and connect enrollees to community resources. As part of this evaluation and in an effort to answer research question 2.4a, the independent evaluator spoke with representatives from each MCO, BlueCare, Amerigroup, and UnitedHealthcare to better understand their roles in identifying and addressing non-medical needs among enrollees. The observations from the interviews are summarized in **Figure 72**.

Managed Care	Date of		
Organization	Conversation	Topics Discussed	Key Takeaways
BlueCare	10/31/2023	Health Starts Program	Non-medical needs must be
Amerigroup	11/6/2023	Screening Process	addressed at each stage of the
UnitedHealthcare	11/10/2023	 Technology/Data 	care continuum, including
		Community-Based	screening, resource allocation,
		Organizations	and closing the loop
		Funding Challenges	 Screening is an important yet
		Role of Providers	imperfect process; many tools
			are burdensome to providers or
			do not adequately capture
			current needs
			Community-Based Organizations
			play a critical role in building
			trust and identify and address

Figure 72: MCO Interviews Summary Table

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Managed Care Organization	Date of Conversation	Topics Discussed	Key Takeaways
organization			 non-medical needs, but are often limited by financial restraints Some non-medical needs are easier to solve than others; some providers avoid screening for housing needs knowing there is not much that can be done to help Providers need motivating factors to continue to do the work (e.g., provider payment reform)

Addressing SDOH throughout the Care Continuum

Through the Health Starts program, MCOs identify and address non-medical needs at each stage of the care continuum, including screening for SDOH, providing resources and connections to community partners to address SDOH deficiencies, and closing the loop with enrollees and following up to determine whether the need was met. This is outlined in **Figure 73**.

Figure 73: Process Flow for Addressing Non-Medical Needs



Screening Process

There are a number of tools that providers and community partners leverage to identify SDOH needs among enrollees, with the most common being the PREPARE tool. MCOs try to 'meet their providers and community partners where they are at' and do not require a single tool to be utilized, recognizing there is no one perfect tool. Some common issues with screening tools included:

- Many tools are long or may result in dual entry by providers, which can reduce utilization.
- The PREPARE tool is not well-designed for screening needs among the pediatric population.
- Screening tools with questions regarding "the last 12 months", can often be misleading as things can change drastically in that timeframe and it does not provide a clear picture as to whether the need is immediate or already resolved.

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Key Takeaway: MCOs defer to screening tools preferred by their providers and community partners, recognizing there is no one perfect screening tool

Technology and Data Collection

Many screening tools rely on technology to streamline the screening process, and MCOs have worked with community partners and providers to ensure that baseline technology needs are met. This includes providing tablets to provider offices and community partners to perform screenings with enrollees. Leveraging technology in the screening process is vital for creating a constant flow of data on enrollees' needs to be able to connect them with resources as soon as possible. However, while recognizing the role and benefit of technology, MCOs also emphasize how it can impede the interpersonal connectedness that is vital in health care. MCOs noted that enrollees may be hesitant to share certain non-medical needs, especially as it relates to fears of children's needs not being met and potential repercussions from human services.

Key Takeaway: MCOs all emphasized the importance of the trust building process with enrollees, especially during screening, to promote accurate and complete data collection.

Community-Based Organizations (CBOs)

Each MCO relies on community partners (referred to as Community-Based Organizations or CBOs) to facilitate screenings, connecting enrollees to resource, and closing the loop. CBOs work in provider offices, patient-centered medical homes, and other settings to reach enrollees for SDOH screenings. When needs are identified, the CBOs link enrollees to resources to help address those needs, and then later follow up regarding whether the need had been met. CBOs are an essential part of the Health Starts program as they help reach a wider range of enrollees than what the MCOs would be able to reach itself. Additionally, CBOs play a pivotal role in developing trusting relationships with enrollees, which each MCO cited as essential for gathering honest and accurate data during screening and answering calls during the loop-closing process. Despite the essential role of CBOs, one of the key challenges reported during the interviews was financial constraints. Many CBOs run out of funding, as many of the programs operate on grant money rather than a reliable and consistent source of funding. This creates challenges to provide resources and meet enrollees' needs on a consistent basis. MCOs emphasized the importance of reliable funding sources for CBOs to meet the goals of the Health Starts Program.

Key Takeaway: CBOs are vital in helping MCOs reach more enrollees, develop trust, and connect enrollees to local resources to meet their non-medical needs. However, a more consistent stream of funding is critical to meet enrollees' needs on an ongoing basis.

Address Non-Medical Needs

MCOs cited how some non-medical needs are easier to solve for than others, such as connecting enrollees to local food banks after screening positive for food insecurity. One of the more challenging SDOH to solve for

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has been housing, with one MCO reporting that its providers did not want to even screen for it knowing that they have no solution to the issue. This reflected an overall theme around the importance of stratifying needs as part of the screening process, notably as to whether things are immediate needs or if they are needs that the member wants solved. For example, a member might screen for housing instability, but might be content living with family enrollees and therefore not want a housing resource. This gets back at the overall takeaway that the screening process cannot tell the full picture and reinforces the need for those interpersonal connections to get at the details otherwise not captured in a standard screening tool.

During the interviews, MCOs also spoke to the future state and the changes needed to continuously improve the effort to address non-medical needs. MCOs noted the benefits of integrating SDOH needs into claims data and clinical coding so that MCOs and providers could differentiate whether a member was referred to a food bank versus signed up for SNAP benefits to meet their food needs. Further, MCOs recognized the effort on the provider side that goes into screening and addressing non-medical needs, and noted the importance of incentives to stay involved, specifically provider payment reform.

Overall, each MCO spoke extremely highly of TennCare and its commitment to serve its enrollees with the highest possible level of care. MCOs also recognized the unique opportunity to work alongside one another, otherwise competitors, to achieve common goals in supporting enrollees' needs.

Hypothesis 2.5 – Follo	wing implementation of the TennCare III demonstration, participant engagement in dental
	nnCare III enrollees will maintain or increase.
Primary RQ 2.5.a	Has participant engagement in dental services for TennCare children and adolescents
	maintained or increased following implementation of TennCare III?
Summary	The Partial Enrollment Adjusted Ratio has dipped several points below the 2017-2019 rates
	but could recover in later evaluation years. The DBM dental sealant rate has also fallen
	slightly. The silver diamine fluoride rate has consistently increased every year since 2017.
Analytic Approach	The independent evaluator assessed this RQ using interrupted time series (ITS) analysis of 3
	metrics – Partial Enrollment Adjusted Ratio, DBM Dental sealant rate, and DBM silver
	diamine fluoride rate. The independent evaluator reports each metric on an annual basis in
	Figure 74 as well as monthly in interrupted time series plots. When these metrics are
	transformed to monthly numbers, figures are significantly lower. For each interrupted time
	series analysis, the independent evaluator seasonally adjusted the metrics using classical
	moving average decomposition.
Results	Figure 75 shows the partial enrollment adjusted ratio from 2017 through 2022. The one-
	time shift associated with the onset of COVID-19 was significant at045 (p-value near 0).
	After the sharp drop at the onset of COVID-19, the difference in slope associated with
	COVID-19 was estimated at +0.0045 (p-value near 0), which reflects the Partial Enrollment
	Adjustment Ratio (PEAR) coming back toward previous levels after the initial shock. When

Key Takeaway: Housing is one of the most common non-medical need, yet it is also the most difficult for which to provide support. MCOs see potential in better integration of non-medical needs into claims data and clinical coding to better support TennCare enrollees.

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 Hypothesis 2.5 – Following implementation of the TennCare III demonstration, participant engagement in dental services for eligible TennCare III enrollees will maintain or increase.		
the TennCare III demonstration begins in January 2021, the trend changes again – the difference in slope is estimated at -0.0047 (p-value near 0), and the one-time shift when TennCare III begins is not significant at -0.01 (p-value .14). The PEAR overall has not recovered to pre-COVID-19 levels, and it does not appear to be trending upward since the beginning of TennCare III. As for all other dental utilization metrics, revisiting this in the next evaluation report will yield more information because TennCare has expanded dental coverage to more adults in 2023.		
Figure 76 shows the DBM dental sealant rate from 2018 through 2022. The one-time shift associated with the onset of COVID-19 was significant at279% (p-value near 0). After the sharp drop at the onset of COVID-19, the difference in slope associated with COVID-19 was estimated at +0.026 (p-value near 0), which reflects the level coming back after the initial shock. When the TennCare III demonstration begins in January 2021, the trend changes again – the difference in slope is estimated at -0.028 (p-value near 0), and the difference in level is not significant at -0.07 (p-value .06). The two changes in slope indicate that the overall sealant rate trend is returning mostly to its pre-COVID trend, though it is still lower. As mentioned in the PEAR analysis, revisiting this in future years will be more informative with recent eligibility changes.		
Figure 77 shows the DBM silver diamine fluoride rate from 2018 through 2022. The one-time change component of the COVID-19 intervention term was significant at033% (p-value = .0001). After the sharp drop at the onset of COVID-19, the difference in slope associated with COVID-19 was estimated at +0.0044 (p-value = .0015), which reflects the SDF rate coming back after the initial shock. The TennCare III demonstration beginning in January 2021 sees the trend change again – the difference in slope is estimated at -0.0054 (p-value = .0002), and the one-time change in January 2021 is not significant at +0.0047% (p-value .62). The SDF rate overall has continued rising even through COVID-19. The current trend is slightly lower than the pre-COVID trend, but still positive. A causal interpretation of this model is not appropriate in this situation because of the significant effects COVID-19 showed on the sealant rate. Future evaluation reports with more post-implementation data will be more robust.		

Figure 74: Selected Dental Metrics – 2017-2022 ⁶²	
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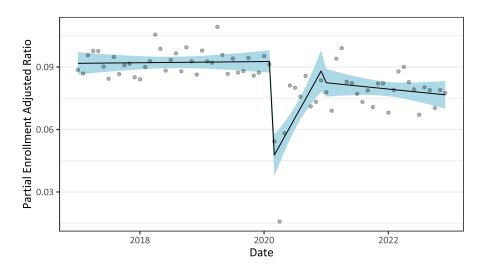
			DBM Silver Diamine
Year	PEAR	DBM Dental Sealant Rate	Fluoride Rate
2017	0.53	4.40	0.099
2018	0.54	4.48	0.244

⁶² Guidehouse analysis of Tennessee DBM Claims Data, 2017-2022

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Year	PEAR	DBM Dental Sealant Rate	DBM Silver Diamine Fluoride Rate
2019	0.55	4.97	0.479
2020	0.46	3.84	0.634
2021	0.48	4.36	0.984
2022	0.48	4.21	1.12

Figure 75: Partial Enrollment Adjusted Ratio (PEAR) – Sum of the FTE for qualifying eligibles with 1 or more qualifying services in the MY divided by sum of FTE for all qualifying eligible, 2017-2022⁶³



⁶³ Guidehouse analysis of Tennessee DBM Claims Data, 2017-2022

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Figure 76: DBM Dental Sealant Rate – Percentage of unduplicated enrollees receiving qualifying dental sealant service in the MY on at least one of the following teeth: 2, 3, 14, 15, 18, 19, 30, 31, 2017-2022⁶⁴

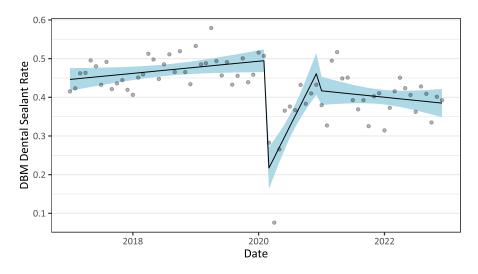
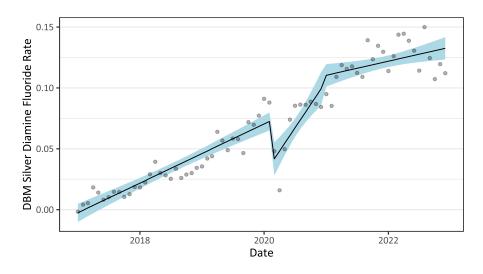


Figure 77: DBM Silver Diamine Fluoride Rate – Percentage of unduplicated enrollees receiving qualifying SDF service in the MY on a primary or permanent tooth, 2017-2022⁶⁵



Hypothesis 2.5 – Following implementation of the TennCare III demonstration, participant engagement in dental		
services for eligible TennCare III enrollees will maintain or increase.		
Primary RQ 2.5.b	Has participant engagement in dental services for pregnant TennCare enrollees maintained	
	or increased following implementation of TennCare III?	

 ⁶⁴ Guidehouse analysis of Tennessee DBM Claims Data, 2017-2022
 ⁶⁵ Guidehouse analysis of Tennessee DBM Claims Data, 2017-2022

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Hypothesis 2.5 – Following implementation of the TennCare III demonstration, participant engagement in dental services for eligible TennCare III enrollees will maintain or increase.

Summary	The independent evaluator will analyze this RQ for a trend in later evaluation years. Since	
	dental coverage was rolled out for pregnant enrollees in April 2022, there is no way to	
	compare engagement before and after implementation of TennCare III.	
Analytic Approach	N/A	
Results	The independent evaluator reports that an estimated 1,484 pregnant enrollees utilized	
	dental benefits during the perinatal period in 2022.	

Hypothesis 2.6 – Under Medicaid State Plan.	TennCare III, enrollees will receive Medicaid benefits in excess of those available under the
Primary RQ 2.6.a	What benefits did TennCare enrollees receive that were in excess of the benefits authorized
	under the Medicaid State Plan following implementation of TennCare III?
Summary	Benefits available to TennCare enrollees expanded since the implementation of TennCare III
	compared to benefits authorized under the Medicaid State Plan.
Analytic Approach	Descriptive analysis of TennCare Notices of Amendments since TennCare III implementation.
Results	Expanded benefits included:
	• Effective January 1, 2022, expanded benefits for chiropractic services; previously,
	chiropractic services were covered as medically necessary only for children under 21 but are now covered as medically necessary for adult TennCare enrollees. ⁶⁶
	• Effective April 1, 2022, expanded Medicaid postpartum coverage for mothers from 60 days to 12 months.
	• Effective April 1, 2022, extended dental benefits to pregnant and postpartum enrollees. ⁶⁷ Previously, dental benefits were covered only for children under age 21 and for adults in certain LTSS programs.
	• Effective January 1, 2023, extended dental benefits for all adult enrollees.
	 Effective October 1, 2022, expanded access to the CHOICES program to individuals that were not otherwise eligible for Medicaid. Specifically, TennCare re-opened enrollment for the CHOICES Group 3 which increased the number of adults able to receive TennCare benefits.⁶⁸
	 Added 2,000 slots to ECF CHOICES to work toward the goal of eliminating all waitlists for HCBS programs. Effective June 1, 2023, implemented coverage of lactation support services as a
	 preventive service for pregnant women, nursing mothers, and their children. Effective June 18, 2023, implemented 12 months of continuous eligibility for children.
	 Effective January 1, 2024, enhanced coverage of low-income pregnant women from 195% FPL to 250% FPL.

⁶⁶ TennCare Notice of Amendment. https://www.tn.gov/content/dam/tn/tenncare/documents2/ChiropracticSPAPublicNotice.pdf

⁶⁷ TennCare Notice of Amendment. https://www.tn.gov/content/dam/tn/tenncare/documents2/Amendment4ComprehensiveNotice.pdf

⁶⁸TennCare Notice of Amendment. <u>https://www.tn.gov/content/dam/tn/tenncare/documents2/CHOICESGroup3ComprehensiveNotice.pdf</u>

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Hypothesis 2.7 – DSIPs	will continue to provide important safety net services to Tennesseans.	
Primary RQ 2.7.b	Do Tennesseans have access to BH and I/DD provider and service delivery networks?	
Summary	Access to BH and I/DD providers has improved since the implementation of TennCare III.	
Analytic Approach	The independent evaluator assessed this RQ with descriptive and one group pretest-posttest	
	analyses.	
Results	Figure 78 shows the behavioral health provider ratio for 2019 through 2021. The ratio	
	decreased from 3,668:1 in 2019 to 3,083:1 in 2021, indicating that on average, access to	
	behavioral health provider and service delivery networks is improving.	
	Figure 79 shows the I/DD provider ratio for 2017 through 2022. There is a downward trend	
	from 49,329:1 to 23,272:1, indicating that access to I/DD provider and service delivery	
	networks is improving. A chi-square test returns a p-value near 0, confirming that the	
	difference between the baseline (2017-2019) and evaluation (2021-2022) periods is	
	significant.	

Figure 78: Mean population to BH provider ratio, all counties, 2019-2021⁶⁹

Year	Population: BH Providers
2019	3,668:1
2020	3,562:1
2021	3,083:1

Figure 79: Mean population to I/DD provider ratio, all counties, 2017-2022⁷⁰

Year	Population: I/DD Providers
2017	49,329:1
2018	38,043:1
2019	24,924:1
2020	24,507:1
2021	23,228:1
2022	23,272:1

⁶⁹ Guidehouse analysis of Tennessee DOH Safety Net Reports data, 2019-2021

⁷⁰ Guidehouse analysis of TennCare data extract, 2017-2022

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Hypothesis 2.9 – The retroactive eligibility waiver will not significantly impact the likelihood of enrollment or health status of enrollees subject to the retroactive eligibility waiver.

status of emolecs subje	ect to the retroactive eligibility waiver.
Primary RQ 2.9.a	Do Medicaid-eligible individuals in Tennessee subject to the retroactive eligibility waiver
	enroll in Medicaid at the same rates as eligible individuals in other states who have access to
	retroactive eligibility?
Summary	Tennessee has maintained a higher level of enrollment compared to other similar states.
Analytic Approach	The independent evaluator addressed this RQ with a difference-in-differences analysis of
	Tennessee compared to 10 comparison states selected using the Euclidean similarity score
	method outlined in Section C. States were also selected only if they have maintained 90-day
	retroactive eligibility. The independent evaluator compared the proportion of Medicaid-
	eligible individuals in Tennessee subject to the retroactive eligibility waiver who enrolled in
	Medicaid to eligible individuals in other states who have access to retroactive eligibility.
	The difference-in-differences analysis utilized IPUMS ACS data from 2017-2021 ACS samples.
	Due to the limitations of ACS data, this analysis focused solely on Medicaid-eligible
	individuals who were eligible due to their income levels. ACS data did not provide Medicaid
	eligibility variables to address other categorical reasons for eligibility.
	This difference-in-differences analysis also did not satisfy the parallel trends assumption. The
	independent evaluator inspected trends using individual comparison states as well as the
	calculated comparison group overall, but there were no groupings that provided a parallel
	trend. The independent evaluator also conducted the analysis using a more limited group of
	states – Kentucky, Ohio, Wisconsin, Iowa, and Indiana – that had more similar income
	eligibility limits to Tennessee, but the parallel trend assumption was never satisfied. Given
	these caveats, the independent evaluator determined a descriptive analysis rather than a
	difference-in-differences analysis was appropriate.
Results	Figure 80 shows each state's proportion of income-eligible individuals enrolled each year.
	Figure 81 shows the same data, aggregating the comparison group into one series.
	Tennessee has hovered at just over 50% of its income-eligible individuals enrolled each year,
	with a spike occurring during 2020. It has also generally remained at a higher level than most
	comparison states, though the proportion enrolled fell in 2021 from 56.4% to 51.6%. Due to
	the lack of available 2022 data, the lack of Medicaid eligibility information mentioned above,
	and the failed parallel trend assumption, difference-in-difference analysis of the proportion
	of individuals subject to the retroactive eligibility who enroll in Medicaid will be more
	informative when revisited in future reports. The independent evaluator may also
	recommend that this item be analyzed using T-MSIS data for a more complete picture of
	retroactive eligibility analysis in the future.

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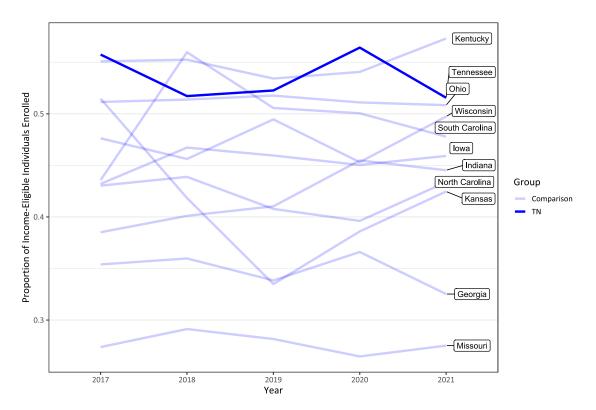


Figure 80: Proportion of Income-Eligible Individuals Enrolled, 2017-2021⁷¹

⁷¹ Guidehouse analysis of IPUMS ACS data extracts, 2017-2021

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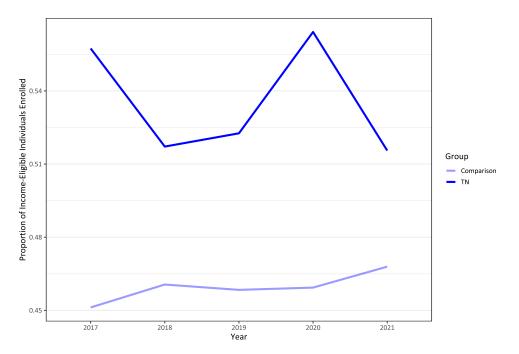


Figure 81: Proportion of Income-Eligible Individuals Enrolled, Aggregated, 2017-2021⁷²

••	retroactive eligibility waiver will not significantly impact the likelihood of enrollment or health bject to the retroactive eligibility waiver.
Primary RQ 2.9.c	Do the health outcomes of enrollees subject to the retroactive eligibility waiver differ from those of enrollees in other states who have access to retroactive eligibility?
Summary	Data quality/quantity limitations mean this analysis does not carry a causal interpretation. Tennessee generally saw slightly worse health outcomes in this group of enrollees when compared to similar states.
Analytic Approach	The independent evaluator also addressed this RQ with a difference-in-differences analysis. The analysis focused on four different metrics, enumerated in result figures below. A separate model was fit for each metric. The independent evaluator conducted a difference-in-difference analysis utilizing BRFSS data. Due to the format of BRFSS data, some of the criteria to be subject to the retroactive eligibility waiver, such as being over 21 years of age, had to be approximated with the age
	categories provided. In this case, 21 years of age was respecified to be 18, so the actual values for each survey metric will be slightly different than reflected here. Additionally, the 2017 and 2020 versions of the BRFSS dataset did not contain any respondents from Tennessee, so all plots will show an imputed value for 2020. The evaluator did not include any imputed values in the models – instead, Tennessee's dataset was left without a value for 2020. Due to this limitation, the parallel trends assumption cannot be fully satisfied.

 $^{^{\}rm 72}$ Guidehouse analysis of IPUMS ACS data extracts, 2017-2021

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Hypothesis 2.9 – The retroactive eligibility waiver will not significantly impact the likelihood of enrollment or health status of enrollees subject to the retroactive eligibility waiver.							
status of enrollees	Difference-in-differences results will be reported, but because of the broken parallel trends						
	assumption, the analysis should not be interpreted as a causal analysis. The comparison						
	group is the same as used for RQ 2.9.b previously.						
Results	Figure 82 depicts the results of the analysis of the variable GENHLTH, which was aggregated						
	to reflect the percentage of enrollees who answered with a 1 or 2, indicating very good or						
	excellent health. Trends for this item were similar, but not completely parallel, requiring a						
	limited interpretation of the difference-in-differences result. The difference-in-differences						
	estimate came to016, indicating that Tennessee's proportion in good health declined						
	slightly more than the comparison group's proportion, but the result (p = 0.56) was not significant.						
	Figure 83 depicts the results of the evaluator's analysis of MENTHLTH, which asks						
	respondents how many days in the last month they were in poor mental health. The parallel						
	trend assumption is failed for MENTHLTH, so the difference-in-differences estimate is less						
	likely to reflect the actual effect of TennCare III in this case. The estimate came to 1.6 (p =						
	.018), so the model indicates that Tennessee's average number of days in poor mental						
	health increased significantly more from pre-implementation years to post-implementation						
	years than the comparison group. However, because of violated assumptions and missing						
	2020 data, causal conclusions cannot be drawn from this analysis.						
	Figure 84 shows the results of the analysis completed for PHYSHLTH, which asks						
	respondents how many days in the last month they were in poor physical health. Again, the						
	parallel trend assumption is likely not satisfied. The difference-in-differences for this item						
	was estimated at .09 with a p-value of 0.89, so the result is not significant and agrees with						
	visual analysis – Tennessee has stayed mostly on trend with the comparison group.						
	Figure 85 shows results of the analysis on POORHLTH, which asks respondents how many						
	days in the last month their poor health interfered with their usual activities. Again, the						
	parallel trend assumption may not be satisfied. The difference-in-differences estimate came						
	to .82 (p = .29) and was not significant. Tennessee's average days with interfering poor						
	health was consistently slightly lower than the comparison group, but because of the						
	mentioned data limitations, this analysis will likely be more informative when there is more						
	post-implementation data.						

Hypothesis 2.9 – The retroactive eligibility waiver will not significantly impact the likelihood of enrollment or health

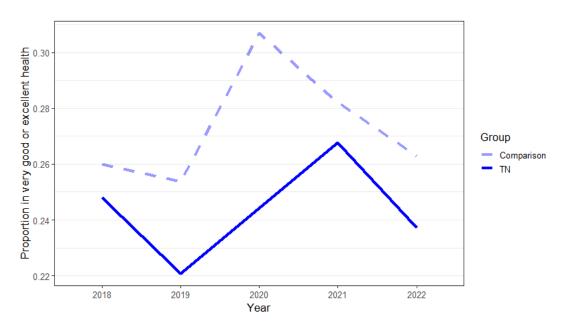
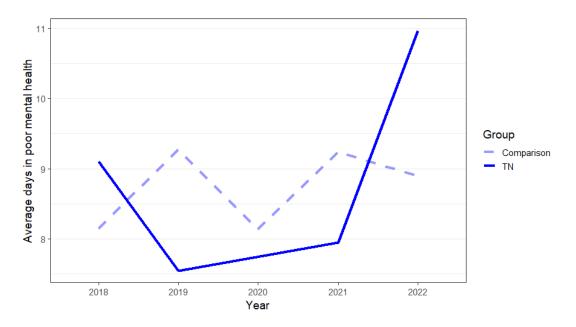


Figure 82: Proportion of enrollees reporting they are in very good or excellent health⁷³

Figure 83: Average number of days in poor mental health⁷⁴



⁷³ Guidehouse analysis of BRFSS data extracts, 2018-2022

⁷⁴ Guidehouse analysis of BRFSS data extracts, 2018-2022

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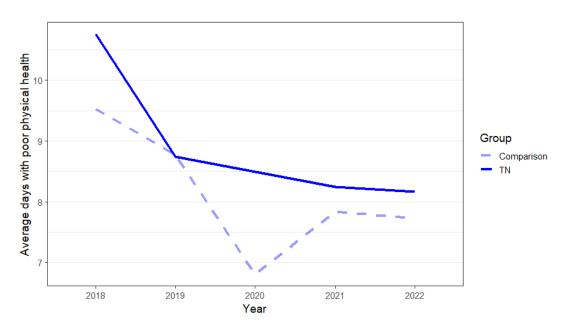
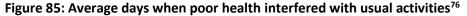
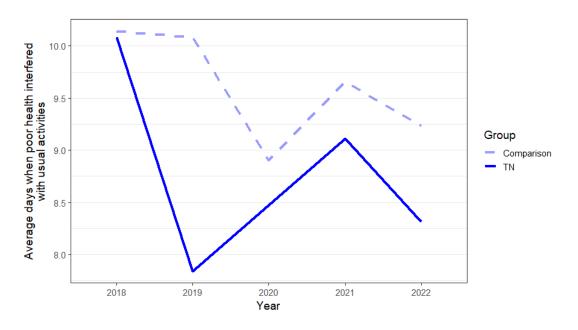


Figure 84: Average number of days in poor physical health⁷⁵





⁷⁵ Guidehouse analysis of BRFSS data extracts, 2018-2022

⁷⁶ Guidehouse analysis of BRFSS data extracts, 2018-2022

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Hypothesis 2.9 – The retroactive eligibility waiver will not significantly impact the likelihood of enrollment or health status of enrollees subject to the retroactive eligibility waiver.

Primary RQ 2.9.d	What are the common barriers to timely renewal for enrollees subject to the retroactive eligibility waiver?						
Summary	The independent evaluator developed and distributed qualitative surveys to 32,942						
	enrollees subject to the retroactive eligibility waiver in 2021.						
Analytic Approach	Of the 32,942 individuals surveyed, 244 responded, and 44 entered the eight-digit access						
	code provided. Due to the challenges with the access code, demographic-specific analyses						
	could not be performed and were excluded from this report.						
	The survey focused on accessing care, health insurance, and health status. In future reports,						
	the independent evaluator will incorporate additional survey questions as well as hosts						
	focus groups to better assess any barriers that may be related to timely enrollment						
	associated with the retroactive eligibility waiver.						
Results	Figure 86 displays the total responses when asked about accessing care while waiting for						
	TennCare application approval. Of those subject to the retroactive eligibility waiver, a						
	majority reported that their care was not impacted due to the waiver. Of the 70 that did						
	delay care while waiting for their TennCare application to process, a majority reported some						
	or significant impact on their health, shown in Figure 87 .						
	The survey asked about changes in health three months prior to enrolling in TennCare and						
	after enrolling, and the results are shown in Figure 88 . A majority reported no change or						
	improved health after enrolling in TennCare. Less than 10% of participants reported their						
	health declined since enrolling. The survey also asked to describe their health, and Figure 89						
	displays the responses. Most survey respondents reporting having Good or Excellent Health.						

Figure 86: Impact of Waiver on Accessing Care

Impact of the Retroactive Eligibility Waiver on Care Access	Responses
Did not require health care services while awaiting application approval	28% (69)
Required and received health care services while awaiting application approval	43% (107)
Required and delayed health care services while awaiting application approval	29% (70)

Figure 87: Impact on Health while Awaiting Care

Impact on Health of Those that Delayed Care	Responses
No Impact	13% (9)
Some Impact	59% (41)
Significant Impact	28% (20)

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Figure 88: Change in Health After Enrolling in TennCare

Change in Health After Enrollment	Responses
No Change	41% (101)
Health Improved	51% (125)
Health Declined	8% (20)

Figure 89: Health Status After TennCare Enrollment

Health After Enrollment	Responses
Excellent	16% (40)
Good	40% (98)
Fair	35% (86)
Poor	9% (22)

3. Goal 3: Ensure enrollees' satisfaction with services

Hypothesis 3.1 – Following implementation of the TennCare III demonstration, TennCare enrollee satisfaction with
health care services will maintain or improve.

Primary RQ 3.1.a	Has the implementation of TennCare III maintained or improved TennCare enrollee					
	satisfaction with overall health care?					
Summary	Overall enrollee satisfaction has stayed at consistent high levels since 2009.					
Analytic Approach	Enrollee satisfaction may be analyzed with an interrupted time series design in the future,					
	but with only 2 post-implementation observations available, the independent evaluator					
	analyzed enrollee satisfaction descriptively in this report.					
Results	Figure 90 shows yearly enrollee satisfaction percentages. In the entire period that the					
	Beneficiary Satisfaction Survey has reported results (2009-2022), the percentage of enrollees					
	who are satisfied with their care has always hovered between 92% and 95%. This has not					
	changed since the implementation of TennCare III, with a 2021 measure of 92% and a 2022					
	measure of 95%.					

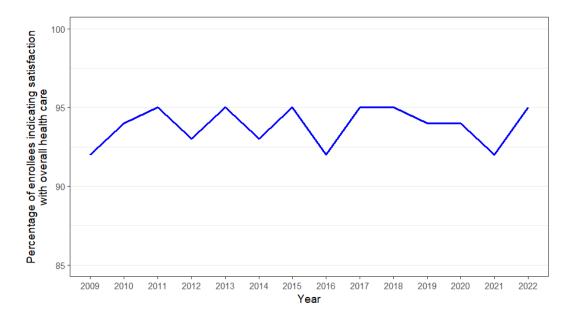


Figure 90: Percentage of enrollees indicating satisfaction with their overall health care, 2009-2022⁷⁷

Hypothesis 3.1 – Following implementation of the TennCare III demonstration, TennCare enrollee satisfaction with							
health care services will maintain or improve.							
Primary RQ 3.1.b	Has the implementation of TennCare III maintained or improved CHOICES enrollee						
	satisfaction?						
Summary	The NCI-AD survey provided limited information, but satisfaction among CHOICES enrollees						
	did not change significantly pre- and post-implementation of TennCare III.						
Analytic Approach	The independent evaluator analyzed this RQ with a one group pretest-posttest design.						
	Because of data availability limitations, the baseline period comprised 2017 and 2018, and						
	the implementation period was 2021. No NCI-AD data was available in the 2020-2021 survey						
	period, which would have been used as 2020 data, and Tennessee did not report data in						
	2019-2020 period, which would have been used as 2019 data.						
Results Figures are reported in Figure 91 below. A chi-square test for the percentage of CH0							
	enrollees whose paid support staff do things the way they want them done returned a						
	nonsignificant result with a p-value of .22, indicating that the percentage did not change						
	significantly before and after TennCare III's implementation. A chi-square test for the						
	percentage of CHOICES enrollees whose long-term care services meet their needs and goals						
	returned a nonsignificant result with a p-value of .32. This indicates that the percentage did						
	not change significantly before and after TennCare III's implementation.						

⁷⁷ Source: The Impact of TennCare: A Survey of Recipients, 2009-2022

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Year	Percentage Whose Paid Support Staff Do Things the way They Want Them Done (n)	Percentage Whose Long-Term Care Services Meet Their Needs and Goals (n)
2017	80% (388)	77% (822)
2018	86% (422)	78% (783)
2021	79% (269)	80% (583)

Figure 91: RQ 3.1.b NCI-AD survey items, 2017, 2018, 202178

4. Goal 4: Provide enrollees with appropriate and cost-effective Home and Community-Based Services (HCBS) within acceptable budgetary parameters

Hypothesis 4.1 – Following implementation of the TennCare III demonstration, the proportion of individuals who								
receive HCBS rather than NF care will maintain or increase.								
Primary RQ 4.1.a	Has the implementation of TennCare III maintained or increased the number and percentage							
	of CHOICES enrollees actively receiving HCBS?							
Summary	Utilization of HCBS and NF services in CHOICES maintained their pre-implementation levels.							
Analytic Approach	The independent evaluator assessed this RQ with one group pretest-posttest methods.							
Results	Figure 92 shows total CHOICES enrollees at the end of each year and overall during the year.							
	It also breaks out the percentage of CHOICES enrollees who receive HCBS and NF services.							
	Overall, observed changes in these proportions were small – usually less than a percentage							
	point each year. Generally, the percentage of CHOICES enrollees receiving HCBS or NF							
	services saw only a 1 or 2 percentage point difference from 2017 to 2022. For the EOY							
	metrics, p-values were nonsignificant, indicating that there was not a significant change in							
	the proportion of enrollees receiving each type of care. For the overall "during year" metrics,							
	p-values were significant, but effect sizes were extremely low. There was a statistically							
	significant difference, but the chi-square test was likely overpowered because of the large							
	dataset. The percentage of CHOICES enrollees receiving HCBS and NF services during a given							
	year changed by 1 percentage point or less pre- and post-implementation. Overall, the							
	percentage of CHOICES enrollees receiving HCBS vs. NF services changed only slightly from							
	year to year, and the percentage of CHOICES enrollees receiving HCBS at the end of each							
	year increased slightly.							

Note: Most RQs associated with Goal 4 were intended to use a difference-in-differences method with T-MSIS comparison data. Because T-MSIS data was unavailable, the evaluator instead used one-group pretest-posttest and descriptive analyses to evaluate TennCare's performance in this area.

⁷⁸ Guidehouse analysis of NCI-AD data, 2018, 2019, 2022

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Figure 92: Percentage of CHOICES enrollees receiving HCBS vs. NF services, at end of year (EOY) and during the entire year, 2017-2022

						Percentage of
		Percentage of	Percentage of		Percentage of	CHOICES
		CHOICES	CHOICES	Total Unique	CHOICES	Enrollees
	CHOICES	Enrollees	Enrollees	CHOICES	Enrollees	Receiving NF
	Enrollees at	Receiving HCBS	Receiving NF	Enrollees During	Receiving HCBS	Services During
Year	ΕΟΥ	at EOY	Services at EOY	Year	During Year	Year
2017	28,700	41%	59%	38,290	40%	64%
2018	28,647	42%	59%	38,003	40%	64%
2019	28,516	41%	59%	37,896	40%	64%
2020	25,267	43%	56%	36,717	40%	63%
2021	24,962	40%	59%	34,230	41%	63%
2022	24,198	40%	59%	33,168	41%	64%
Chi-square						
test p-value	N/A	.076 (.005)	.11 (.004)	N/A	.0007 (.008)	.0002 (.009)
(effect size)						

Note: The percent of CHOICES enrollees receiving HCBS and the percent receiving NF services at EOY do not always sum to 100% for each year due to rounding. The percent of CHOICES enrollees receiving HCBS and the percent receiving NF services during each year add up to more than 100% across the years analyzed. This is caused by 3-4% of CHOICES enrollees switching between HCBS and NF services during the year.

Hypothesis 4.1 – Follow	ing implementation of the TennCare III demonstration, the proportion of individuals who	
receive HCBS rather that	n NF care will maintain or increase.	
Primary RQ 4.1.b	Has the implementation of TennCare III maintained or increased the ratio of HCBS to NF	
	service costs for CHOICES enrollees?	
Summary	The ratio of HCBS to NF service costs stayed flat after TennCare III's implementation.	
Analytic Approach	HCBS and NF costs were analyzed with a one-group pretest-posttest.	
Results	Figure 93 displays total LTSS costs since 2017, with columns to break out the percentage of	
	those costs coming from HCBS vs. NF services. Both total LTSS costs and the percentage	
	devoted to each type of service have been stable from 2017-2022. A chi-square test yielded	
	a p-value near 1, indicating the pre- and post-implementation periods do not show a	
	significant difference in the percentage of LTSS costs for each category.	

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Year	Total LTSS Costs	Percentage of LTSS Costs for HCBS	Percentage of LTSS Costs for NF services
2017	\$1,230,168,836	22%	78%
2018	\$1,317,309,802	21%	79%
2019	\$1,380,470,933	21%	79%
2020	\$1,312,773,190	21%	79%
2021	\$1,235,920,678	21%	79%
2022	\$1,281,592,269	21%	79%

Figure 93: LTSS cost breakdown, 2017-2022⁷⁹

Hypothesis 4.1 – Following implementation of the TennCare III demonstration, the proportion of individuals who receive HCBS rather than NF care will maintain or increase.

Primary RQ 4.1.c	Has the implementation of TennCare III maintained or decreased the average LTSS costs per
	CHOICES enrollee?
Summary	This trend was present before the implementation of TennCare III, but HCBS and NF service
	costs per CHOICES enrollee both increased after implementation
Analytic Approach	The independent evaluator analyzed the average LTSS and NF service costs with t-tests of
	mean costs per enrollee.
Results	Figure 94 shows the annual HCBS and NF service costs per CHOICES enrollee. The costs per
	enrollee for both HCBS and NF services have risen slowly over time. T-tests for average LTSS
	and NF service costs had p-values near 0, though effect sizes (Cohen's d) were low at
	approximately .02. This indicates that the increase in costs per enrollee has been statistically
	significant (due to large sample sizes), but slight. The increase in per-enrollee costs may have
	been caused partly by ARP funding that precipitated investments like increased wages for
	the frontline CHOICES HCBS workforce.

Figure 94: HCBS and NF services costs per CHOICES enrollee, 2017-2022⁸⁰

Year	HCBS costs per CHOICES Enrollee	NF Services Costs per CHOICES Enrollee
2017	\$7,071	\$25,056
2018	\$7 <i>,</i> 375	\$27,287
2019	\$7,624	\$28,803
2020	\$7 <i>,</i> 502	\$28,251
2021	\$7,486	\$28,619

⁷⁹ Guidehouse analysis of Tennessee Claims and Encounter data ⁸⁰ Guidehouse analysis of Tennessee Claims and Encounter data

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Year	HCBS costs per CHOICES Enrollee	NF Services Costs per CHOICES Enrollee
2022	\$8,006	\$30,632

Hypothesis 4.1 – Following implementation of the TennCare III demonstration, the proportion of individuals who receive HCBS rather than NF care will maintain or increase.

Primary RQ 4.1.d	Has the implementation of TennCare III maintained or increased the number and percentage
	of individuals with I/DD actively receiving HCBS?
Summary	More post-implementation data is needed, but the number and percentage of individuals
	with I/DD receiving HCBS did maintain or increase after implementation of TennCare III.
Analytic Approach	The independent evaluator analyzed this RQ with chi-square testing to identify if the
	proportion of enrollees with I/DD receiving HCBS increased over time.
Results	Figure 95 shows that the proportion of enrollees with I/DD receiving HCBS have increased at
	a statistically significant level, rising from 14% in 2017 to 19% in 2022 for the EOY measure
	and 7% in 2017 to 10% in 2022 for the total annual measure. P-values were near 0 for both
	measures, while the EOY measure showed an effect size of .03 and the total annual measure
	showed an effect size of .02, meaning differences were slight. More post-implementation
	data could show more robust differences in future years. Additionally, because the evaluator
	had to attribute I/DD enrollees at a given point in time using actual encounters, the number
	of I/DD enrollees at EOY reported is likely lower than reality. The number of I/DD enrollees
	during the year is more representative of the true I/DD population in Tennessee.

Figure 95: Number and percentage of enrollees with I/DD receiving HCBS at EOY and during the year, 2017-2022⁸¹

				Percentage of
		Percentage of		Enrollees with
		Enrollees with		I/DD Receiving
	I/DD Enrollees	I/DD Receiving	I/DD Enrollees	HCBS During
Year	at EOY	HCBS at EOY	During Year	Year
2017	12,673	14%	30,696	7%
2018	14,005	16%	33,098	8%
2019	15,951	16%	36,067	9%
2020	16,738	15%	36,221	9%
2021	18,153	16%	40,243	9%
2022	19,055	19%	43,689	10%

⁸¹ Guidehouse analysis of Tennessee Claims and Encounter data

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Hypothesis 4.1 – Following implementation of the TennCare III demonstration, the proportion of individuals who receive HCBS rather than NF care will maintain or increase.

Primary RQ 4.1.e	Has the implementation of TennCare III maintained or increased the ratio of HCBS to ICF/IID
	service costs for individuals with I/DD?
Primary RQ 4.1.f	Has implementation of the TennCare III demonstration maintained or decreased the average
	LTSS costs per individual with I/DD?
Summary	LTSS costs per individual with I/DD have increased post-implementation, but this trend was
	present before TennCare III as well.
Analytic Approach	The independent evaluator analyzed LTSS costs per individual with I/DD using a t-test.
Results	Figure 96 shows total and per-enrollee LTSS costs for enrollees with I/DD. LTSS costs for
	enrollees with I/DD have risen in absolute terms and in per-enrollee terms from 2017 to
	2022, going from approximately \$23 million to \$121 million and \$780 to \$2,770,
	respectively. The total number of enrollees with I/DD receiving HCBS has also increased
	since 2017, from 2,193 to 4,344 enrollees. The t-test returned a p-value near 0 and Cohen's
	d = .05, indicating that costs per enrollee have risen at a statistically significant level.

Note: Due to data limitations, the independent evaluator was unable to separate HCBS and ICF/IID claims for enrollees with I/DD and therefore RQs 4.1.e and 4.1.f were grouped together. For this report, total LTSS costs are reported in **Figure 96** below.

Figure 96: Total and per-enrollee LTSS costs for enrollees with I/DD, 2017-2022⁸²

		Enrollees with	LTSS Cost per	Total LTSS Costs
	Enrollees with	I/DD Receiving	Enrollee with	for Enrollees with
Year	I/DD During Year	HCBS	I/DD	I/DD
2017	30,696	2,193	\$780	\$23,936,856
2018	33,098	2,749	\$1,270	\$42,031,741
2019	36,067	3,141	\$1,581	\$57,004,438
2020	36,221	3,259	\$1,951	\$70,652,680
2021	40,243	3,430	\$2,233	\$89,851,911
2022	43,689	4,344	\$2,770	\$121,021,297

Hypothesis 4.1 – Following implementation of the TennCare III demonstration, the proportion of individuals who receive HCBS rather than NF care will maintain or increase.

Primary RQ 4.1.g	Has the implementation of TennCare III maintained or increased the level of institutional	
	transition and diversion for CHOICES enrollees?	
Summary	Generally, institutional transition and diversion maintained or increased. The average length	
	of stay in HCBS for CHOICES enrollees did fall from 94 days in 2017 to 82 days in 2022.	
Analytic Approach	The independent evaluator addressed this RQ using chi-square and t-testing to determine if	
	levels of transition and diversion maintained or increased after TennCare III's	

⁸² Guidehouse analysis of Tennessee Claims and Encounter data

TennCare III Demonstration – 2023 Interim Evaluation Report Independent Evaluator: Guidehouse Inc.

Hypothesis 4.1 – Following implementation of the TennCare III demonstration, the proportion of individuals who receive HCBS rather than NF care will maintain or increase.

for NF care but were diverted, but data was unavailable for NF care applications. All other metrics were calculated as planned in the evaluation design, including the percentage of CHOICES enrollees who meet NF level of care but access HCBS for 90+ days in a year, the average length of stay in HCBS for CHOICES enrollees, and the percentage of new LTSS recipients in CHOICES who are admitted to NFs.ResultsFigure 97 shows metrics around institutional transition and diversion. There was no significant difference found in the pre- and post-intervention percentage of new LTSS recipients in CHOICES admitted to NFs (p = .64.) For the average length of stay in HCBS for				
metrics were calculated as planned in the evaluation design, including the percentage of CHOICES enrollees who meet NF level of care but access HCBS for 90+ days in a year, the average length of stay in HCBS for CHOICES enrollees, and the percentage of new LTSS recipients in CHOICES who are admitted to NFs.ResultsFigure 97 shows metrics around institutional transition and diversion. There was no significant difference found in the pre- and post-intervention percentage of new LTSS recipients in CHOICES admitted to NFs (p = .64.) For the average length of stay in HCBS for		implementation. One metric from this RQ focused on the number of individuals who applied		
CHOICES enrollees who meet NF level of care but access HCBS for 90+ days in a year, the average length of stay in HCBS for CHOICES enrollees, and the percentage of new LTSS recipients in CHOICES who are admitted to NFs.ResultsFigure 97 shows metrics around institutional transition and diversion. There was no significant difference found in the pre- and post-intervention percentage of new LTSS recipients in CHOICES admitted to NFs (p = .64.) For the average length of stay in HCBS for		for NF care but were diverted, but data was unavailable for NF care applications. All other		
average length of stay in HCBS for CHOICES enrollees, and the percentage of new LTSS recipients in CHOICES who are admitted to NFs.ResultsFigure 97 shows metrics around institutional transition and diversion. There was no significant difference found in the pre- and post-intervention percentage of new LTSS recipients in CHOICES admitted to NFs (p = .64.) For the average length of stay in HCBS for		metrics were calculated as planned in the evaluation design, including the percentage of		
recipients in CHOICES who are admitted to NFs. Results Figure 97 shows metrics around institutional transition and diversion. There was no significant difference found in the pre- and post-intervention percentage of new LTSS recipients in CHOICES admitted to NFs (p = .64.) For the average length of stay in HCBS for		CHOICES enrollees who meet NF level of care but access HCBS for 90+ days in a year, the		
ResultsFigure 97 shows metrics around institutional transition and diversion. There was no significant difference found in the pre- and post-intervention percentage of new LTSS recipients in CHOICES admitted to NFs (p = .64.) For the average length of stay in HCBS for		average length of stay in HCBS for CHOICES enrollees, and the percentage of new LTSS		
significant difference found in the pre- and post-intervention percentage of new LTSS recipients in CHOICES admitted to NFs (p = .64.) For the average length of stay in HCBS for		recipients in CHOICES who are admitted to NFs.		
recipients in CHOICES admitted to NFs (p = .64.) For the average length of stay in HCBS for	Results	Figure 97 shows metrics around institutional transition and diversion. There was no		
		significant difference found in the pre- and post-intervention percentage of new LTSS		
CHOICES aprolleges at test found a significantly lower mean after the intervention with a n		recipients in CHOICES admitted to NFs (p = .64.) For the average length of stay in HCBS for		
choices en onees, a c-test round a significantity lower mean after the intervention, with a p-		CHOICES enrollees, a t-test found a significantly lower mean after the intervention, with a p-		
value near 0 and Cohen's D of .07. The percentage of CHOICES enrollees who meet a NF		value near 0 and Cohen's D of .07. The percentage of CHOICES enrollees who meet a NF		
level of care and access HCBS for 90 or more days rose significantly after the implementation		level of care and access HCBS for 90 or more days rose significantly after the implementation		
of TennCare III, with a p-value near 0 and an effect size of .05.		of TennCare III, with a p-value near 0 and an effect size of .05.		

Figure 97: Institutional transition and diversion metrics, 2017-2022⁸³

Year	Percentage of CHOICES Enrollees who Meet NF Level of Care and Access HCBS	Average Length of Stay in HCBS for CHOICES Enrollees Annually	Percentage of New LTSS Recipients in CHOICES Admitted to NFs
2017	27%	94 days	83%
2018	29%	92 days	81%
2019	30%	90 days	81%
2020	31%	86 days	78%
2021	34%	85 days	82%
2022	33%	82 days	81%

Hypothesis 4.2 – Following implementation of the TennCare III demonstration, participation levels in integrated employment for individuals with I/DD will maintain or increase.

	-	
Primary RQ 4.2.a	Has the implementation of TennCare III maintained or increased the number of individuals with I/DD that participate in integrated employment and earn at or above the minimum	
	wage?	
Summary	The number of individuals with I/DD that participate in integrated employment and earn at	
	or above minimum wage has increased each year since 2017, and the percentage has	
	increased slightly post-implementation. More post-implementation data will provide a more	
	complete picture here.	

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⁸³ Guidehouse analysis of Tennessee Claims and Encounter data

Hypothesis 4.2 – Following implementation of the TennCare III demonstration, participation levels in integrated employment for individuals with I/DD will maintain or increase.

Analytic Approach	The independent evaluator addressed this RQ using a chi-square test to determine if a
	higher percentage of individuals with I/DD participate in integrated employment and earn
	the minimum wage or higher.
Results	A chi-square test on this metric (shown in Figure 98) showed that this percentage has
	increased significantly since the implementation of TennCare III with a p-value near 0. The
	percentage of adults with I/DD participating in integrated employment decreased to 19% in
	2021 (was previously 23% in 2020), but the positive trend continued in 2022 with 22%. Even
	with the 2021 decrease, the overall increase in adults with I/DD participating in integrated
	employment was still statistically significant.

Figure 98: Number and percentage of individuals with I/DD who are enrolled in HCBS programs and making at/above minimum wage, 2017-2022⁸⁴

Year	Number of Adults	Percentage of Adults
2017	1,324	17%
2018	1,549	19%
2019	1,735	21%
2020	1,952	23%
2021	1,610	19%
2022	2,032	22%

Hypothesis 4.5 – Following implementation of the TennCare III demonstration, premium requirements for participants in Part A of the Katie Beckett program will not reduce the likelihood of enrollment or enrollment continuity among participants.

7 01	
Primary RQ 4.5.d.i	What is the health insurance status and reported change in health status among Katie
	Beckett Part A enrollees that were suspended from the program due to non-payment of
	premiums?
Primary RQ 4.5.d.ii:	What is the health insurance status and reported change in health status among Katie
	Beckett Part A enrollees that voluntarily separated from the program?
Summary	The independent evaluator developed and distributed qualitative surveys to enrollees that
	disenrolled from Katie Beckett Part A in 2021 or 2022.
Analytic Approach	The independent evaluator developed and distributed an online survey in November 2023 to
	assess reasons for disenrollment in Katie Beckett Part A and any subsequent changes in
	insurance and health status. The independent evaluator sent the survey to 21 TennCare
	enrollees that disenrolled from the Katie Beckett Program Part A in 2021 or 2022. Each
	survey included an access code to enable the independent evaluator to perform
	demographic-specific analyses.

⁸⁴ TennCare extract of TennCare Individual Employment Data Survey

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Hypothesis 4.5 – Follow	ring implementation of the TennCare III demonstration, premium requirements for		
participants in Part A of	f the Katie Beckett program will not reduce the likelihood of enrollment or enrollment		
continuity among partic	continuity among participants.		
Results	Only five households responded and therefore the numbers were too low to report. The independent evaluator could not perform demographics analysis without risking that the enrollees who completed the survey could be identified based on the responses. All survey respondents were parents or guardians of Katie Beckett enrollees. None of the respondents reported that their child was suspended from the program due to non-payment of premiums; all respondents reported other reasons for disenrollment. Therefore, there was no data to analyze the change in insurance or health status for enrollees that involuntarily disenrolled from the program due to non-payment of premiums and Primary RQ 4.5.d.i could not be answered.		
	For those that voluntarily separated from the program, a majority of the respondents reported transitioning from Part A to Part B of the Katie Beckett Program, and while the remainder reported leaving the Katie Beckett Program entirely. Disenrollment: Of the respondents that left the program entirely, some were unaware of the		
	ability to switch to Part B of the Katie Beckett Program, while others reported aging out of the program.		
	<i>Changes in Health Status:</i> A majority of survey participants reported health status stayed the same after disenrolling from Katie Beckett Part A.		
	<i>Health Insurance Coverage:</i> All survey participants reported some form of health insurance coverage since disenrolling from Katie Beckett Part A, primarily receiving coverage either through Katie Beckett Part B or TennCare. Only a few respondents reported receiving commercial coverage through employers to supplement coverage received through the state.		

Note: Both RQ 4.5.d.i and 4.5.d.ii were evaluated simultaneously in the surveys and reported together.

5. Goal 5: Manage expenditures at a stable and predictable level, and at a cost that does not exceed what would have been spent in a Medicaid fee-for-service program

Hypothesis 5.1 – Following implementation of the TennCare III demonstration, TennCare expenditures will grow at		
a slower and more sust	ainable rate than the average national Medicaid expenditures.	
Primary RQ 5.1.a	Has TennCare maintained an expenditure growth rate that is slower than the average	
	national Medicaid expenditure growth rate?	
Summary	From 2020 to 2022, TennCare has maintained a slower expenditure growth rate than the	
	national Medicaid expenditure growth rate.	
Analytic Approach	The independent evaluator conducted a descriptive analysis to evaluate the national and	
	TennCare expenditure growth rates.	

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Hypothesis 5.1 – Following implementation of the TennCare III demonstration, TennCare expenditures will gr	ow at
a slower and more sustainable rate than the average national Medicaid expenditures.	

Results	As shown in Figure 99, publicly available expenditures data from the MBES Financial
	Management Report indicate that TennCare's total costs for Medicaid and CHIP have grown
	at a slower rate than the total national expenditures for Medicaid and CHIP.

Figure 99: Medicaid expenditures including CHIP⁸⁵

		TN – Year-over-Year		National – Year-over-
FY	TN	Change	National	Year Change
FY20	\$11,538,272,557	N/A	\$652,931,212,149	N/A
FY21	\$11,097,270,878	-3.8%	\$717,143,060,778	9.8%
FY22	\$11,264,609,657	1.5%	\$792,734,393,498	10.5%

Hypothesis 5.1 – Follow	ing implementation of the TennCare III demonstration, TennCare expenditures will grow at
a slower and more sust	ainable rate than the average national Medicaid expenditures.
Primary RQ 5.1.b	What is the difference between TennCare III's aggregated costs and the PMPM budget
	neutrality cap, and how does this change over the duration of the demonstration period?
Summary	The difference between aggregated spending and the cap was over \$1 billion in 2021 and
	2022.
Analytic Approach	The independent evaluator conducted a descriptive analysis to evaluate the difference
	between spending and the cap.
Results	Figure 100 displays the gap between TennCare III's aggregated costs and the aggregate of
	the PMPM budget neutrality caps in 2021 and 2022. The individual caps are set for each
	eligibility group, and thus it is important to aggregate to take into account actual
	membership during each period. Costs have remained lower than the budget neutrality cap
	each year by more than \$1 billion. Future evaluations will yield more definitive information
	on how the gap is trending over time. The gap was larger in 2022 than 2021, so the
	evaluator will monitor future years for a consistent trend.

Figure 100: Aggregated costs vs. budget neutrality cap, 2021-2022⁸⁶

	DY1 (Jan 8 – Dec 31, 2021)	DY2 (CY22)
Aggregate Cap (Adjusted)	\$10,425,540,188	\$11,360,348,088
Total Actual Spend	\$9,055,773,844	\$9,855,056,084
Difference	\$1,369,766,344	\$1,505,292,004

⁸⁵ MBES Financial Management Report

⁸⁶ TennCare CMS-64 submission

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Hypothesis 5.1 – Following implementation of the TennCare III demonstration, TennCare expenditures will grow at a slower and more sustainable rate than the average national Medicaid expenditures.		
Primary RQ 5.1.c	What are the administrative operational costs of the demonstration?	
Summary	Administrative costs were about \$467 billion and \$502 billion in 2021 and 2022, respectively.	
Analytic Approach	The independent evaluator conducted descriptive analysis to illustrate the administrative	
	operational costs of the demonstration.	
Results	Figure 101 displays the administrative costs of the TennCare III demonstration.	
	Administrative costs rose by approximately 7.5% from 2021 to 2022.	

Figure 101: Administrative operational costs of TennCare III, 2021-2022

Year	Administrative Costs
2021	\$467,194,161
2022	\$502,023,850

F. Conclusions

Through TennCare III, Tennessee has brought forth numerous program improvement since January 2021. Listed in chronological order, program improvements implemented between January 2021 and December 2022 that impacted this evaluation include:

- Added 2,000 additional slots in the ECF CHOICES program, which were initially funded through Section 9817 of the ARP.
- Added Enabling Technology as a benefit for persons with disabilities, which was previously part of Tennessee's HCBS plan through the ARP.
- Expanded postpartum coverage from 60 days to 12 months following the end of pregnancy.
- Implemented the dental benefit for pregnant and postpartum women.
- Reopened a pathway for TennCare coverage for individuals at risk of needing institutional care.

The metrics and research questions reviewed as part of this evaluation aimed to assess both the impact of the program improvements listed above as well as program goals that carried over from TennCare II. Overall, many of the metrics reviewed as part of this first interim evaluation report have maintained similar levels since the implementation of TennCare III or were inconclusive due to limited data. Because TennCare III continued many of the policies from the prior version of the TennCare demonstration (TennCare II), maintaining similar levels of performance was in some cases the expected outcome.

Based on the data presented, more time is needed to see the effect of the TennCare III demonstration based on the metrics used for the evaluation. The COVID-19 public health emergency impacted data collection and the ability to interpret the effect of certain policies and programs. Further, the COVID-19 public health emergency impacted how TennCare enrollees used health care, decreasing utilization of some specific types of preventative care such as cancer screenings and wellness visits.

Despite the challenges associated with the COVID-19 public health emergency, TennCare III has helped make progress toward the goals outlined for this evaluation, notably in efforts to improve access to care. TennCare enrollees have greater access to MAT and the overall number of providers in the BESMART Program has increased since the demonstration began. In addition, there are more enrollees in the PCMH model. Further, since TennCare III, the number of behavioral health providers and the proportion of I/DD providers to the population has improved. Since the implementation of TennCare III, Tennessee has made several policy changes intended to increase access to care through the TennCare demonstration. These include expanding the scope of Medicaid coverage for pregnant and postpartum women in Tennessee, implementing an adult dental benefit, and increasing enrollment in HCBS.

Below are summaries of the interim evaluation results by demonstration goal and a discussion of the demonstration policies that are believed to have contributed to those results.

1. Goal 1: Provide high-quality care to enrollees that will improve health outcomes

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The goal to provide high-quality care to enrollees has existed since the inception of TennCare. All major program updates and amendments implemented under TennCare III were introduced with the goal to improve access to services while maintaining quality of care. The Patient-Centered Medical Home (PCMH) Program and the BESMART Program were two efforts that impacted Goal 1. Notably, the BESMART program was correlated with improved access to MAT, as examined in RQ 1.2.d.

Other areas where the desired trends were observed within Goal 1 included decreased opioid misuse (RQ 1.2.a) and improved quality outcomes for CHOICES enrollees (RQ 1.3.a).

Research Question	Desired Trend	Observation	Conclusion(s)
Primary RQ 1.1.a: Has the	Maintain or Improve	Improved but Inconclusive	TennCare enrollees had
implementation of			better control of high
TennCare III maintained or			blood pressure and HbA1c
improved physical health			compared to national
outcomes for TennCare			averages, but limited data
enrollees?			resulted in insignificant
			findings. All metrics in this
			RQ showed improvement.
Primary RQ 1.1.b: Has the	Maintain or Increase	Inconclusive	TennCare enrollees were
implementation of			screened less frequently
TennCare III maintained or			for cervical cancer
increased the utilization			compared to national
rates of preventive or			averages; child wellness
wellness services for			visits in first 15 months
TennCare enrollees?			were higher than national
			benchmarks, but lower in
			first 30 months. 15-month
			well child visits increased in
			2021, while 30-month well
			child visits and child and
			adolescent well-care visits
			decreased slightly.
Primary RQ 1.1.c: Has the	Maintain or Increase	Maintained	TennCare mirrored
implementation of			national benchmarks for
TennCare III maintained or			utilization of EPSDT
increased the utilization			services. The screening
rates of EPSDT services for			ratios stayed level after
TennCare enrollees?			implementation, and the
			participant ratio
			maintained in 2020 and
			2021.
Primary RQ 1.1.d: Has the	Maintain or Improve	Maintained	TennCare continued to
implementation of			maintain higher than

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Research Question	Desired Trend	Observation	Conclusion(s)
TennCare III maintained or			national average rates of
improved the management			follow-up after
of behavioral health (BH)			hospitalization for mental
conditions for TennCare			health. The rate
enrollees?			maintained from 2020 to
			2021.
Primary RQ 1.2.a: Has the	Maintain or Decrease	Decreased	First time opioid use,
implementation of			chronic opioid use, and
TennCare III maintained or			opioid prescriptions
decreased opioid misuse			decreased during the
among TennCare enrollees			demonstration; acute
(i.e., first-time, acute, and			opioid use has slowly
chronic opioid users)?			decreased but leveled off
			from 2020-2022.
Primary RQ 1.2.b: Has the	Maintain or Decrease	Inconclusive	NAS births maintained a
implementation of			downward trend, but the
TennCare III maintained or			independent evaluator was
decreased the number of			unable to differentiate the
Neonatal Abstinence			impact of TennCare III vs.
Syndrome live births?			COVID-19 on the trend.
Primary RQ 1.2.c: Has the	Maintain or Improve	Inconclusive	Tennessee saw a large
implementation of			decrease in use of
TennCare III maintained or			pharmacotherapy for
improved the rate of			opioid use disorder. The
opioid use disorder (OUD)			decrease was larger than
treatment for TennCare			observed in national
enrollees?			benchmarks, but a lack of
			data limited the
			independent evaluator's
			ability to draw causal
			conclusions.
Primary RQ 1.2.d: Has the	Maintain or Improve	Improved	Providers in the BESMART
implementation of			program and enrollees who
TennCare III maintained or			received care through
improved access to MAT?			MAT/BESMART increased
			since the implementation
			of TennCare III.
Primary RQ 1.3.a: Has the	Maintain or Improve	Improved	CHOICES enrollees
implementation of			reported better control of
TennCare III maintained or			chronic conditions since
improved quality outcomes			

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Research Question	Desired Trend	Observation	Conclusion(s)
for CHOICES enrollees?			the implementation of
			TennCare III.
Primary RQ 1.3.c: Has the	Maintain or Improve	Inconclusive	Tennessee generally
implementation of			showed more positive
TennCare III maintained or			outcomes than the
improved quality outcomes			national average. Some
for individuals with I/DD?			survey items showed
			worse results than usual in
			2022, but 2022 results
			came from a smaller
			sample that was not
			considered statistically
			robust by NCI. Analysis in
			later years may offer more
			concrete conclusions.
Primary RQ 1.3.d: Has the	Maintain or Improve	Inconclusive	Tennessee generally
implementation of			showed more positive
TennCare III maintained or			outcomes than the
improved quality of life for			national average. Some
individuals with I/DD?			survey items showed
			decline since 2017, but
			2022 results came from a
			smaller sample that was
			not considered statistically
			robust by NCI. Analysis in
			later years may offer more
			concrete conclusions.

2. Goal 2: Ensure enrollee access to health care, including safety net providers

Many of the program improvements and amendments under TennCare III prioritized access to health care, specifically enhancing benefits and coverage. Notably under TennCare III, dental benefits were implemented first for pregnant and postpartum women in April 2022, and then implemented for all adults in January 2023 (previously dental services were only covered for children under 21 years and certain individuals receiving LTSS). Due to the timing of this evaluation, engagement in dental services were only measured for children and pregnant and postpartum women. As described in the table below for RQ 2.5a, COVID-19 significantly decreased the utilization of dental services in early 2020, although the data showed engagement in dental services was largely maintained for children under 21 years. Similarly, the expansion of dental benefits for pregnant and postpartum women only took effect a few months before this evaluation, and therefore there were not sufficient data to draw a conclusion for RQ 2.5b. In future reports, the independent evaluator will be

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able to assess these questions with more robust data as well as expand the analysis to assess for utilization among the general adult population.

In addition to expanding access to dental services, improvements under TennCare III aimed to improve health care access for pregnant and postpartum women by expanding coverage from 60 days to 12 months following pregnancy in April 2022. As seen in RQ 2.3a, timeliness of prenatal care slightly increased since the implementation of TennCare III, which correlates to the newly add program enhancements. As more data is collected on this and other measures in the following years, the independent evaluator should be able to draw more conclusive observations on the impact of these improvements on prenatal and postpartum care utilization.

Overall, TennCare III maintained or improved enrollees' access to health care across a number of areas, including consistent utilization services for preventive care, ambulatory services, inpatient visits, and mental health visits (RQ 2.1.a). The proportion of TennCare enrollees cared for through the PCMH model increased during the demonstration (RQ 2.2.a), as did the number of both BH providers and I/DD providers relative to the population (RQ 2.7.b). One area that will require additional data and analysis regarding its impact on enrollee access to health care is around the retroactive eligibility waiver. The independent evaluator plans to leverage additional data sources, including focus groups, to better understand the impact of the retroactive eligibility waiver in future reports (RQ 2.9).

Research Question	Desired Trend	Observation	Conclusion(s)
Primary RQ 2.1.a: Has the	Maintain or Improve	Maintained	Tennessee continued to
implementation of			maintain consistent
TennCare III maintained or			utilization rates for
improved enrollee			preventive and ambulatory
utilization of services?			care services, inpatient
Primary care			visits, and mental health
Inpatient visits			visits. Prescription drug
BH visits			utilization decreased
 Prescription drugs 			significantly in 2020, but it
			was inconclusive as to
			whether it was due to
			TennCare III or COVID-19.
Primary RQ 2.2.a: Has the	Maintain or Increase	Increased	Proportion of TennCare
implementation of			enrollees cared for through
TennCare III maintained or			PCMH model increased
increased the number and			significantly since the
proportion of TennCare			implementation of
enrollees cared for through			TennCare III.
the PCMH model?			
Primary RQ 2.3.a: Has the	Maintain or Increase	Increased but Inconclusive	Tennessee had lower rates
implementation of			of timeliness of prenatal

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Research Question	Desired Trend	Observation	Conclusion(s)
TennCare III maintained or			care compared to national
increased member			averages until 2021 but has
engagement in prenatal			increased slightly since the
care?			implementation of
			TennCare III. The increase
			was not large enough to
			draw a conclusion in this
			evaluation.
Primary RQ 2.3.b: Has the	Maintain or Improve	Increased but Inconclusive	Postpartum visits slowly
implementation of			increased over time and
TennCare III maintained or			accelerated in 2021 and
increased member			2022. The pretest-posttest
engagement in postpartum			analysis did not allow the
care?			evaluator to conclude this
			was an effect of TennCare
			III, but the increase after
			implementation was
			significant.
Primary RQ 2.4.a: What	N/A	N/A	MCOs partnered with
strategies did the MCOs			Community-Based
implement to address non-			Organizations to
medical needs affecting			implement structured
enrollees' health?			screening processes in
			provider offices as well as
			build trust with enrollees
			to provide non-medical
			supports to improve
			health.
Primary RQ 2.5.a: Has	Maintain or Increase	Maintained but	Dental services have
participant engagement in		Inconclusive	remained consistent since
dental services for			the implementation of
TennCare children and			TennCare III but were
adolescents maintained or			severely decreased during
increased following			early 2020 as a result of
implementation of			COVID-19. Because PEAR
TennCare III?			and DBM dental sealant
			rates have not fully
			recovered to pre-COVID
			levels and the SDF rate has
			continued trending up, the
			trend in overall

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Research Question	Desired Trend	Observation	Conclusion(s)
			engagement in dental
			services is mixed.
Primary RQ 2.5.b: Has	Maintain or Increase	Inconclusive	Because dental benefits for
participant engagement in			pregnant enrollees were
dental services for			implemented in April 2022,
pregnant TennCare			no statistical tests could be
enrollees maintained or			completed. Future
increased following			evaluations can analyze
implementation of			potential trends in
TennCare III?			utilization.
Primary RQ 2.6.a: What	N/A	N/A	Enrollees received
benefits did TennCare			additional benefits for
enrollees receive that were			postpartum coverage and
in excess of the benefits			chiropractic services.
authorized under the			Pregnant and postpartum
Medicaid State Plan			enrollees received
following implementation			expanded dental benefits.
of TennCare III?			CHOICES program
			expanded to accommodate
			more enrollees.
Primary RQ 2.7.b: Do	Maintain or Improve	Improved	Tennessee has seen an
Tennesseans have access			increase in the number of
to BH and I/DD provider			both BH providers and
and service delivery			I/DD providers relative to
networks?			the population.
Primary RQ 2.9.a: Do	Parallel Trends	Inconclusive	Due to incomplete data,
Medicaid eligible			the independent evaluator
individuals in Tennessee			could not satisfy the
subject to the retroactive			parallel trends assumption
eligibility waiver enroll in			and therefore the data was
Medicaid at the same rates			inconclusive. In future
as eligible individuals in			evaluation years, BRFSS
other states who have			may have more than one
access to retroactive			post-evaluation year with
eligibility?			Tennessee data available,
			allowing the independent
			evaluator to establish a
			post-implementation trend
			and attain stronger
			conclusions.

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Research Question	Desired Trend	Observation	Conclusion(s)
Primary RQ 2.9.c: Do the	Parallel Trends	Inconclusive	TennCare enrollees subject
health outcomes of			to the retroactive eligibility
enrollees subject to the			waiver reported a decline
retroactive eligibility			in health compared to
waiver differ from those of			enrollees in comparison
enrollees in other states			states, but the results were
who have access to			not significant and parallel
retroactive eligibility?			trend assumptions could
			not be met.
Primary RQ 2.9.d: What	N/A	Inconclusive	Data was unavailable for
are common barriers to			the interim evaluation.
timely renewal for			
enrollees subject to the			
retroactive eligibility			
waiver?			

3. Goal 3: Ensure enrollees' satisfaction with services

The goal to ensure enrollees' satisfaction continues from previous iterations of the demonstration into TennCare III. All major program updates and amendments implemented under TennCare III were introduced with the intention to maintain or improve enrollees' satisfaction with services. No updates or amendments specifically targeted this goal. Both TennCare enrollees' and CHOICES enrollees' satisfaction remained consistent in the initial years of the TennCare III demonstration. As TennCare continues to invest in new programs and initiatives throughout the demonstration, the independent evaluator expects to see continued or improved levels of satisfaction among enrollees.

Research Question	Desired Trend	Observation	Conclusion(s)
Primary RQ 3.1.a: Has the	Maintain or Improve	Maintained	Enrollee satisfaction did
implementation of			not change since the
TennCare III maintained or			implementation of
improved TennCare			TennCare III.
enrollee satisfaction with			
overall health care?			
Primary RQ 3.1.b: Has the	Maintain or Improve	Maintained	CHOICES enrollee
implementation of			satisfaction did not change
TennCare III maintained or			since the implementation
improved CHOICES			of TennCare III.
enrollee satisfaction?			

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4. Goal 4: Provide enrollees with appropriate and cost-effective Home and Community-Based Services (HCBS) within acceptable budgetary parameters

Numerous program improvements and amendments under TennCare III aimed to improve access and quality of care for persons with disabilities. Notably, Tennessee adjusted TennCare's budget to continue initiatives initially funded through Section 9817 of the ARP. These included adding 2,000 slots to ECF CHOICES to enroll persons with intellectual or developmental disabilities and adding Enabling Technology as a benefit for persons with disabilities. Under TennCare III, Tennessee also reopened a pathway for TennCare coverage for individuals at risk of needing institutional care through the CHOICES At Risk Demonstration Group, which had been closed from June 30, 2015 through September 30, 2022.

As shown in the table below for RQ 4.2a, the number of individuals with I/DD that participate in integrated employment increased significantly since the implementation of TennCare III. Other areas where the desired trend was observed for Goal 4 includes increased number and percentage of individuals with I/DD receiving HCBS (RQ 4.1.d), increased level of institutional transition and diversion for CHOICES enrollees (RQ 4.1.g), and increased number of individuals with I/DD that participate in integrated employment and earn at or above minimum wage (RQ 4.2.a). There were a few areas where the opposite of the desired trends were observed, such as costs per CHOICES enrollee (RQ 4.1.c) and LTSS costs per individual with I/DD (RQ 4.1.f). Both of these metrics increased since the implementation of TennCare III. The increase in per-enrollee costs may have been caused partly by ARP funding that precipitated investments like increased wages for the frontline CHOICES HCBS workforce. More time is needed to fully understand the impact of the demonstration on these costs.

Research Question	Desired Trend	Observation	Conclusion(s)
Primary RQ 4.1.a: Has the	Maintain or Increase	Maintained	There were not significant
implementation of			observed changes in the
TennCare III maintained or			percentage of CHOICES
increased the number and			enrollees actively receiving
percentage of CHOICES			HCBS since the
enrollees actively receiving			implementation of
HCBS?			TennCare III.
Primary RQ 4.1.b: Has the	Maintain or Increase	Maintained	Costs and percentage
implementation of			devoted to each type of
TennCare III maintained or			cost for LTSS remained
increased the ratio of HCBS			stable since the
to NF service costs for			implementation of
CHOICES enrollees?			TennCare III.
Primary RQ 4.1.c: Has the	Maintain or Decrease	Increased	The cost per CHOICES
implementation of			enrollee has increased for
TennCare III maintained or			both HCBS and NF services
decreased the average			since the implementation
LTSS costs per CHOICES			of TennCare III.
enrollee?			

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Research Question	Desired Trend	Observation	Conclusion(s)
Primary RQ 4.1.d: Has the implementation of TennCare III maintained or increased the number and percentage of individuals with I/DD actively receiving	Maintain or Increase	Increased	The proportion of enrollees with I/DD receiving HCBS increased since the implementation of TennCare III.
HCBS? Primary RQ 4.1.e: Has the implementation of TennCare III maintained or increased the ratio of HCBS to ICF/IID service costs for individuals with I/DD?	Maintain or Increase	Inconclusive	Data was not available for ratio of HCBS to ICF/IID service costs; partial results reported as part of RQ 4.1.f results.
Primary RQ 4.1.f: Has implementation of the TennCare III demonstration maintained or decreased the average LTSS costs per individual with I/DD?	Maintain or Decrease	Increased	LTSS costs per individual with I/DD increased since the implementation of TennCare III.
Primary RQ 4.1.g: Has the implementation of TennCare III maintained or increased the level of institutional transition and diversion for CHOICES enrollees?	Maintain or Increase	Increased	Percentage of enrollees who met NF level of care but accessed HCBS increased and the average length of stay in HCBS both decreased. Percentage of new LTSS recipients admitted to NFs stayed stable.
Primary RQ 4.2.a: Has the implementation of TennCare III maintained or increased the number of individuals with I/DD that participate in integrated employment and earn at or above the minimum wage?	Maintain or Increase	Increased	The number of individuals with I/DD that participate in integrated employment and earn at or above minimum wage increased significantly since the implementation of TennCare III, though there was a slight decline in 2021.
Primary RQ 4.5.d.i: What is the health insurance status and reported change in health status among Katie	N/A	N/A	No enrollees involuntarily disenrolled from the

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Research Question	Desired Trend	Observation	Conclusion(s)
Beckett Part A enrollees that were suspended from the program due to non- payment of premiums?			program due to non- payment of premiums.
Primary RQ 4.5.d.ii: What is the health insurance status and reported change in health status among Katie Beckett Part A enrollees that voluntarily separated from the program?	Maintain	Inconclusive	There were only five responses to the Katie Beckett survey and therefore the independent evaluator could not draw conclusions on the health or insurance status change among those who voluntarily separated from the program.

5. Goal 5: Manage expenditures at a stable and predictable level, and at a cost that does not exceed what would have been spent in a Medicaid fee-for-service program

Similar to Goals 1 and 3, all major program updates and amendments implemented under TennCare III were introduced with the intention to manage expenditures at a stable and predictable level. No major program updates or amendments specifically targeted this goal. The expenditure growth rate continued at a slower rate than the average national Medicaid expenditure growth rate (RQ 5.1.a). More time is needed to better assess how the TennCare III demonstration impacts budget neutrality (RQ 5.1.b) and administrative operational costs (RQ 5.1.c) over time.

Research Question	Desired Trend	Observation	Conclusion(s)
Primary RQ 5.1.a: Has	Maintain	Maintained	TennCare expenditure
TennCare maintained an			growth continued at a
expenditure growth rate			slower rate compared to
that is slower than the			national expenditures for
average national Medicaid			Medicaid and CHIP.
expenditure growth rate?			
Primary RQ 5.1.b: What is	N/A	N/A	Costs have remained lower
the difference between			than the budget neutrality
TennCare III's aggregated			gap each year (2021-2022).
costs and the budget			Additional data is needed
neutrality cap, and how			to assess how the gap is
does this change over the			trending overtime.
duration of the			
demonstration period?			

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Research Question	Desired Trend	Observation	Conclusion(s)
Primary RQ 5.1.c: What are	N/A	N/A	Administrative costs rose
the administrative			by approximately 7.5%
operational costs of the			from 2021 to 2022.
demonstration?			

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G. Interpretations, and Policy Implications and Interactions with Other State Initiatives

The COVID-19 public health emergency had a substantial impact on Medicaid programs across the country, including Tennessee's. Inflation as a biproduct of the COVID-19 public health emergency led to a 2.24% increase in MCO budget line item, and MCO capitation rates increased 5.5%. Coming out of the public health emergency, Tennessee set itself up for success by investing in its IT systems; this allowed for a smooth transition when Medicaid renewals restarted post-public health emergency. As a result, TennCare enrollees are renewing at 60% since Medicaid unwinding began in April 2023, and 40% of those were automatic renewals (both statistics are above the national average).⁸⁷

TennCare's 2023 budget proposal focus areas align with the goals and objectives outlined for TennCare III. As part of its budget proposal, TennCare allocated investments in children's dentistry, LTSS and home meal deliveries, HCBS workforce shortages and minimum wage raises, and children's hospital infrastructure and addressing behavioral health needs.⁸⁸ TennCare also hired two analytics experts to identify fraud, waste, and abuse that investigators otherwise would unlikely be able to identify.⁸⁹ Investing in these two skilled experts will allow for an overall reduction in cost for investigation of fraud, waste, and abuse. Additionally, TennCare's budget proposal prioritized ECF CHOICES enrollment, creating additional slots and reducing the waitlist.⁹⁰

TennCare also coordinates the Health Starts program, which supports its MCOs in partnering with community-based organizations to provide non-medical resources to enrollees. TennCare has prioritized robust data collection to better understand the needs of its enrollees and where to prioritize investments to address those non-medical needs.

⁸⁷ TennCare State Fiscal Budget Hearing. <u>Mediasite - Mediasite Channel (tn.gov)</u>

⁸⁸ TennCare State Fiscal Budget Hearing. <u>Mediasite - Mediasite Channel (tn.gov)</u>

 ⁸⁹ TennCare State Fiscal Budget Hearing. <u>Mediasite - Mediasite Channel (tn.gov)</u>
 ⁹⁰ TennCare State Fiscal Budget Hearing. <u>Mediasite - Mediasite Channel (tn.gov)</u>

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H. Lessons Learned and Recommendations

As discussed in the previous sections, the COVID-19 public health emergency occurred during the evaluation years included in this interim evaluation report. The public health emergency effected elements across the health care spectrum, including Medicaid enrollment levels, service utilization, and access to care. Where appropriate and feasible, the independent evaluator removed CYs 2020 and 2021 from the baseline and intervention periods or supplemented with data from additional pre-COVID-19 or post-COVID-19 years. Nevertheless, this interim evaluation report reflects the significant changes that occurred during the public health emergency, and as such, the ability to draw causal conclusions is limited.

Additionally, the independent evaluator and TennCare, with guidance from CMS, elected not to use T-MSIS data in this interim evaluation report due to challenges with T-MSIS data quality and the process to obtain and use the T-MSIS data. This change limited the ability to construct an out-of-state comparison group and draw causal conclusions from the analysis. In future interim reports, the independent evaluator will assess whether T-MSIS data has improved in reliability and if the original evaluation design using out-of-state comparison groups can be implemented.

I. Attachments

1. TennCare Enrollment Experience Survey

The TennCare Enrollment Experience Survey was administered as an online survey. Participant responses were collected electronically from October 25, 2023, through November 30, 2023. See below for the survey instructions and questions.

TennCare Enrollment Experience Survey

Welcome to the TennCare Enrollment Experience Survey! This **voluntary and confidential** survey will help us understand and improve access to services and TennCare experience.

Your household is part of a sample of households enrolled in TennCare in 2021 who received a letter in the mail to participate in the survey below. To begin, enter your access code from your letter and tell us if you agree to complete the survey. By answering yes, you will be asked 5 multiple choice questions about your experience with TennCare and health insurance coverage.

Please provide the Access Code listed on the letter you received from TennCare with a QR code directing you to this survey.

Access Code

- 1. Are you willing to participate in this survey?
 - a. Yes
 - b. No

Section A

1. When approved for TennCare, coverage starts on the date a member's application is submitted. This means any bills from services before that date are not covered by TennCare. Think about the three months before you applied for TennCare and select the statement that best describes your need for care and access to services.

- a. I needed and received health care services in the three months before my application. Not having TennCare coverage did not stop me from getting care.
- b. I needed health care services in the three months before my application but did not seek care. I delayed getting care until I had TennCare coverage.
- c. I did not need health care services in the three months before my application.

Follow up question only if the member selected answer b for question 1: You answered that you delayed care until being covered by TennCare. Please describe the impact delaying care had on your overall health:

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- a. No impact
- b. Some impact
- c. Significant impact

2. Please describe the difference in health status between the three months before you were enrolled in TennCare and then after you were enrolled in TennCare.

- a. Overall, my health improved after enrolling in TennCare compared to the three months before.
- b. Overall, there was not much difference in my health after enrolling in TennCare compared to the three months before.
- c. Overall, my health declined after enrolling in TennCare compared to the three months before.
- 3. Before enrolling in TennCare, what was your health insurance coverage? Select all that apply.
 - a. Commercial Coverage (e.g., through an employer)
 - b. Medicare
 - c. TennCare (commonly referred to as Medicaid)
 - d. SSI
 - e. Tennessee OPTIONS Program
 - f. TennCare CHOICES Program
 - g. TennCare ECF CHOICES Program
 - h. Medicaid Coverage from Another State
 - i. No health insurance
 - j. Other

Section B

- 4. Overall, how would you rate your health status today?
 - a. Excellent
 - b. Good
 - c. Fair
 - d. Poor
- 5. Please describe your health insurance status as of today. Select all that apply:
 - a. Commercial Coverage (e.g., through an employer)
 - b. Medicare
 - c. TennCare (commonly referred to as Medicaid)
 - d. SSI Tennessee OPTIONS Program
 - e. TennCare CHOICES Program
 - f. TennCare ECF CHOICES Program
 - g. Medicaid Coverage from Another State
 - h. No health insurance
 - i. Other

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2. Katie Beckett Program Survey

The Katie Beckett Program Survey was administered as an online survey. Participant responses were collected electronically from October 25, 2023, through November 30, 2023. See below for the survey instructions and questions.

Katie Beckett Program Survey

Welcome to the TennCare Katie Beckett Program Survey! This **voluntary and confidential** survey aims to help us understand and improve access to services and program experience.

Your household received a letter in the mail containing a QR code to access this survey. All households that disenrolled from Katie Beckett Part A in 2021 or 2022 received a letter with a code to participate in the survey below. Once you enter your access code, you will then be prompted to consent to the survey, after which you will be asked questions regarding your experience with program enrollment and insurance coverage.

Section 1: Introduction

1. Please provide the Access Code listed on the letter you received from TennCare with a QR code directing you to this survey.

Access Code

- 2. Are you willing to participate in this survey?
 - a. Yes
 - b. No
- 3. Who in your household will be completing the survey?
 - a. Parent or guardian of a person enrolled in the Katie Beckett Program Members
 - b. Katie Beckett Program Member (If Over 18)

Section 2: Program Participation

1) Our understanding is that you/your child was disenrolled from the Katie Beckett Program Part A in Calendar Year 2021 or 2022. Katie Beckett Part A requires a monthly premium to remain enrolled in the program, and involuntary disenrollment can occur if premiums are not paid. When you/your child disenrolled from Part A, was it related to non-payment of the monthly premium?

a) Yes, I/my child was involuntary disenrolled from Part A due to nonpayment of premiums

b) No, I/my child disenrolled from Part A for reasons other than nonpayment of premiums

If the answer to Section 2 Question 1 is Yes (disenrolled due to nonpayment of premiums), question (i) would appear.

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i) If you/your child were involuntarily disenrolled from Katie Beckett Part A in Calendar Year 2021 or 2022 due to nonpayment of monthly premiums, have you since re-enrolled in the program?

- a. Yes, I/my child have since re-enrolled in Part A
- b. No, I/my child have not re-enrolled in Part A

After answering Section 2 Question (i), the survey would jump to Section B

If the answer to Section 2 Question 1 is No (other reason for disenrollment), question (ii) would appear.

ii) If you/your child disenrolled from Part A, did you/your child transition to Katie Beckett Part B? As a reminder, Part B does not require a monthly premium to remain enrolled in the program and children in Part B do not receive their regular health insurance through Medicaid.

- a. Yes, I/my child transitioned from Part A to Part B
- b. No, I/my child left the Katie Beckett Program entirely and did not enroll in Part B

If the answer to Section 2 Question (ii) is Yes, the survey would skip to Section 3

If the answer to Section 2 Question (ii) is No, question (iii) will appear:

iii) If you/your child disenrolled in Part A and did not enroll in Part B, please select all applicable reasons from the list below.

- □ Aged out of program
- □ Change in insurance
- □ Change in health
- □ Inadequate services
- □ Moved
- □ Unaware of ability to switch to Part B
- □ Other (fill in the blank option)
- iv) If you selected "Inadequate services" for question 7, please feel free to use the space below to provide more detail if desired. Otherwise proceed to Section 3

After answering Section 2 Question (iv), survey would jump to Section 3

Section 3: Health and Insurance

- 1) Considering the 6 months following when you/your child disenrolled from Part A in 2021, which of the following statements best describes your health during that time?
 - a. Overall, health stayed the same since leaving Part A
 - b. Overall, health declined since leaving Part A
 - c. Overall, health improved since leaving Part A

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- 2) Overall, how would you rate your/your child's health status today?
 - a. Excellent
 - b. Good
 - c. Fair
 - d. Poor
- 3) Since disenrolling from Part A, describe your/your child's enrollment in health insurance and/or other supports. Select all that apply:
 - a. Katie Beckett Part B
 - b. Commercial Coverage (e.g., through an employer)
 - c. Medicare
 - d. TennCare (also known as Medicaid)
 - e. Medicaid Alternative Pathways (MAPs)
 - f. SSI
 - g. Tennessee OPTIONS Program
 - h. Tennessee CHOICES Program
 - i. Tennessee ECF CHOICES Program
 - j. Medicaid Coverage from Another State
 - k. No health insurance
 - l. Other

3. MCO Interview Guide

Below is the interview guide that served as the standard template for each interview to ensure consistency in data collection and procedures. This interview guide was for internal use only and not shared with the MCO interviewees. MCO interviewees received an agenda of discussion topics along with the calendar invite prior to the call but did not have access to the specific questions listed below.

Interview Guide

Hi all and thank you for speaking with us today. For a bit of context, Tennessee is conducting an independent evaluation of its TennCare III program as required by the Centers for Medicare & Medicaid Services (CMS). TennCare is especially interested in enhancing access and quality of care for its Medicaid population. As part of this evaluation, we are conducting interviews with MCOs to better understand the types of resources and services provided that extend beyond traditional forms of health care, including but not limited to food security, housing, and other social determinants of health.

Your participation in the interview is entirely voluntary. This survey is being conducted by an evaluation team that is entirely separate from the rate-setting team and any information collected will not be shared with them.

This interview is expected to take roughly 45 minutes. Before we get started, do you have any questions?

- Please state your name and role at your organization.
- Please describe any processes in place for **screening** patients for nonmedical needs, such as stable housing, food security, reliable transportation, or other relevant social determinants of health.
 - Please describe any benefits your organization has seen as it relates to screening for nonmedical health needs.
 - If data is collected, how is the data used? (If at all)
- In addition to screening for social determinants of health, describe any measures your organization takes to address social determinants of health (e.g., information pamphlets, food vouchers, public transportation cards).
 - Are there measures targeted to certain populations? (E.g., outreach to pregnant women)
 - Please describe any benefits your organization has seen as it relates to providing resources to support nonmedical health needs. Do you have any data on outcomes relation to these supports?
- What strategies have been most successful for your organization in screening and providing resources for nonmedical health needs?
- What are the barriers your organization faces as it relates to screening and addressing nonmedical health needs?
- How often are new resources or efforts incorporated into your program?
- Do you have an overall strategy, for example, a strategic vision or health equity plan that guides decisions on new resources of efforts added to your program?
- Do you have any data collection efforts or analysis in place regarding resources or service connections you offer to members?

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- Do you have an outcome or tracking metrics in place to assess success (e.g., use of quality measures, quantity of referrals)?
- Who in the organization is responsible for things like screening, data analysis, resource creation, care coordination, and other tasks related to non-medical needs?
 - What are their credentials and role in the organization?
 - What is their staffing ratio/case load?
 - Do they have other responsibilities in the organization besides their role in this effort?
- What nonmedical health needs do you feel the population your organization serves could benefit from receiving more support in?
- Is there any additional information you would like to share that has not been discussed?