

SCHOOL OF PUBLIC HEALTH AND TROPICAL MEDICINE

## Department of Health Policy and Management

January 2022

### **1115 Waiver (SUD) Evaluation Annual Report (DY4)**

This report includes a summary of activity on the 1115 Waiver (SUD) Evaluation project from January 2021 – December 2021.

### **PROJECT ACTIVITIES**

During the period defined in this report, Tulane continued regular monthly meetings with its research team and quarterly meetings with LDH to ensure consistent project coordination. The research team continued their work on the three sub-analyses: Cost, Quantitative, and Qualitative.

#### **January – March 2021**

The quarterly meeting between LDH and Tulane was held on January 11<sup>th</sup>. During this meeting three primary topics were discussed.

- Differences between Tulane’s evaluation results and LDH’s reporting results. A meeting was held later the same week to discuss this further.
- DY2 Results Report. A discrepancy between average length of stay calculated by LDH and Tulane was identified. Tulane’s use of the MPI denominator: # of provider/100,000 state residents.
- Mid-point Assessment.
  - Tulane used 2017 as the Baseline year in the MPA but will align with LDH’s use of 2018 as baseline moving forward.
  - LDH clarified the state’s process for monitoring residential providers referring MAT treatment, which is on hold due to COVID 19.
  - Billing vs. Attending MPI. Both billing and attending MPI needed to be demonstrated in the MPA, not just billing.
  - LDH MPA was due to CMS January 19<sup>th</sup>. Candace sent the MPA with comments following this meeting and requested a revised version by January 14<sup>th</sup>.

During the February Tulane internal meeting held on February 8<sup>th</sup>, the status of the data needs raised in the January meeting were discussed to determine if additional input was required, as well as any new data needs that have emerged.

- Tulane researchers and LDH met to reconcile the evaluation and reporting metrics, as discussed at January’s meeting.

- The lead qualitative researcher needed a list of providers with specialty code within the data to identify those providers. Quantitative team worked on compiling this information.

A meeting with LDH, CMS, and the Tulane lead investigators was held following the Tulane internal meeting on February 8<sup>th</sup>. The following items were discussed:

- Moving forward, Tulane will use LDH calculated metrics for those that are calculated monthly. For the metrics that LDH calculates annually, there are two options:
  - LDH can begin calculating all metrics monthly.
  - Tulane can use the specifications used by LDH to calculate the metrics monthly in house.
- CMS expects LDH to use the metric specifications for the period that they are in effect and expects calculations to change across time as the specifications evolve.
- IAT and FUA measures, metrics 15 and 17, are not collected/calculated by LDH. They are calculated by ULM annually. Tulane connected with ULM following this meeting to discuss sourcing the monthly data.
- Draft Interim Evaluation Report was due to CMS on Dec. 31st, 2021. LDH sent a timeline of their review activities so that Tulane can align their report.

During the March Tulane internal meeting held on March 8<sup>th</sup>, the status of the data needs raised in the February meetings were discussed to determine if additional input was required, as well as new data needs that have emerged.

- Meeting with Tulane, LDH, ULM, and Medicaid was scheduled for March 23<sup>rd</sup> to discuss how to get monthly data for measures #15 and #17.
- The lead quantitative researcher received some of the LDH monthly calculated metrics. The team checked if the numbers could be replicated.
- Strategy for the Year 3 Results report and how to handle 2020 data. Can Interrupted Time Series be used to analyze Covid data?
- Qualitative analysis need for list of providers and specialty code within the data to identify those providers from Quantitative team.
- Care Coordination surveys round two was sent into the field.

Additional topics that were discussed are:

- Second draft of the Year 2 Results Report for was submitted to LDH on 12/15. Waiting on review and feedback before finalizing.
- Draft Interim Evaluation Report due to CMS by Dec. 31st, 2021. At the time of this meeting, Tulane was awaiting advice on when to submit results prior to that deadline.

A meeting with LDH and ULM was held on March 23<sup>rd</sup> to discuss monthly data for measures #15 and #17. Key takeaways from this meeting were as follows:

- ULM will aim for getting the data for metrics #15 and #17 to Tulane by mid-July.
- Tulane will follow up with ULM with the complete time frame of data needed and what format.

As of March 31<sup>st</sup>, the following items were received from LDH:

- 1115 SUD Demonstration Waiver Administrative Cost Report – CY20 – December
- 1115 SUD Demonstration Waiver Administrative Cost Report – CY21 – January
- 1115 SUD Demonstration Waiver Administrative Cost Report – CY21 – February

### **April – June 2020**

The quarterly meeting with LDH and Tulane was cancelled on April 12<sup>th</sup>. In lieu of a meeting, Tulane and LDH team members corresponded via email to discuss requirements for the upcoming Draft Interim Evaluation Report. Tulane received the following guidance:

- Tulane should submit the first draft of the Draft Interim Evaluation Report no later than September 10, with an additional two-week period for questions and responses between Tulane and LDH 1115 SUD team. The final draft of the Draft Interim Evaluation is needed by September 24.
- The Draft Interim Evaluation Report must comply with Attachment B of Approved STCs. Attachment B was received following this meeting.

During the May Tulane internal meeting held on May 10<sup>th</sup>, each lead researcher provided an update on their analysis and shared what information, or elements were still in process. The following items were discussed:

- Monthly data for measures #15 and #17(1). ULM sent an IET output template that was approved on 5/6. On 4/28, LDH noted a discrepancy with the timeline of the IET and FUA measures being analyzed by LDH and ULM. Tulane followed up with ULM to access feasibility of 34-day range instead of 30-day, which was found to be possible.
- Strategy for the Year 3 Results. CMS did not provide specific guidance on how to handle the impact of COVID. Internal team discussions favored a basic trend analysis.

The June Tulane team internal meeting on June 14<sup>th</sup> was cancelled. The following update was shared by the team via email:

- A batch of letters inviting physicians to be interviewed was sent out the previous week. More will be sent, and physicians and other types of respondents will be called directly in the coming weeks.

As of June 30<sup>th</sup>, the following items were received from LDH:

- 1115 SUD STCs Attachment B
- 1115 SUD Demonstration Waiver Administrative Cost Report – CY21 – March
- 1115 SUD Demonstration Waiver Administrative Cost Report – CY21 – April
- 1115 SUD Demonstration Waiver Administrative Cost Report – CY21 – May
- CMS Comments on LA 1115 SUD Monitoring Report - DY3 Q3 and Day3 Q4

### **July – September 2020**

The quarterly meeting with LDH and Tulane was held on July 12<sup>th</sup>. During this meeting the following discussion points were raised:

- Tulane inquired whether LDH had received any special guidance as to changes in analysis of data collected during the COVID pandemic period. LDH confirmed that they had not received any special guidance for these circumstances.
- Tulane requested a delivery timeline for the remaining 2020 metric calculations, updated data workbook, and updated LDH to CMS quarterly reports. LDH indicated that the updated reports would be sent that day and the rest of 2020 metric calculation later that week. The data workbook would be sent at a future unspecified date.
- LDH requested additional meetings at 4-week intervals leading up to Draft Interim Evaluation Report due date in September.

During the July Tulane internal meeting held on July 21<sup>st</sup>, each lead researcher provided an update on their analysis and shared what information, or elements were still needed. The following items were discussed:

- The monthly data for measures #15 and #17(1) had not yet been received from ULM.
- LDH had not yet provided the remaining 2020 metric calculations, updated data workbook, and updated quarterly reports to CMS.

The Tulane research team met with LDH on August 6<sup>th</sup> to touch base on the Draft Interim Evaluation Report progress and resolve the remaining needs.

During the August Tulane internal meeting held on August 16<sup>th</sup>, each lead researcher provided an update on their analysis and shared what information, or elements were still needed. The following items were discussed:

- The monthly data for measures #15 and #17(1) had been received from ULM as of this meeting.
- The remaining 2020 metric calculations, updated data workbook and updated LDH to CMS quarterly reports had been received from LDH as of this meeting.
- Scheduling of interviews with Health Systems Leaders and providers was ongoing.

Following the internal meeting, the lead quantitative researcher requested monthly estimates for several metrics in years 2017 and 2020. These included:

- 2017 monthly estimates for metrics: 3, 7, 8, 9, 10, 11, 12, 23, 24 (Received 8/26)
- 2020 monthly estimates for metrics: 5, 13, 14, 25, 36 (Received 8/27)

During the September Tulane internal meeting held on September 14<sup>th</sup>, each lead researcher provided an update on their analysis and shared what information, or elements were still needed.

- Progress on Cost Analyses is pending updated inputs from quantitative analysis.

- The lead quantitative researcher aggregated all the data received and distributed the results to the rest of the team for analysis and report writing this week.
- The lead qualitative researcher was working to reschedule meetings with Health System Leaders that were cancelled due to hurricane Ida. A research assistant was assisting with scheduling provider interviews.

Other topics discussed during this meeting include:

- Revisions to the Draft Interim Evaluation Report timeline, due to Hurricane Ida.
- A report for annual IRB review/renewal was drafted by a team researcher and will be sent to Project PI for review. They will also add the new quantitative research assistant to project personnel.

As of September 30<sup>th</sup>, the following items have been received from LDH:

- 1115 SUD Demonstration Waiver Administrative Cost Report – CY21 – June
- 1115 SUD Demonstration Waiver Administrative Cost Report – CY21 – July
- 1115 SUD Demonstration Waiver Administrative Cost Report – CY21 – August
- Revised Quarterly Reports submitted by LDH to CMS, DY3 Q3 and DY3 Q4
- Revised SUD Monitoring Protocol Part A
- SUD 1115 Metric Data for CY 2017
- SUD 1115 2020 Annual Data in monthly format

### **October-December 2020**

During the October Tulane internal meeting held on October 12<sup>th</sup>, each lead researcher provided an update on their analysis and shared what information, or elements were still needed.

- Two concerns were identified for the Cost analysis. (1) Switching from the evaluation calculated results to LDH calculated results makes the costs unstable. (2) LDH cannot provide pre-period data prior to 2018. The solution may be to scale the evaluation's calculated pre-period to align with LDH's results.
- The remaining data needed from LDH includes monthly metric calculations for monitoring metrics #26 and #27. LDH anticipates providing this data by 12/1.

Other topics discussed during this meeting include:

- Is there a need for a separate Year 3 results report, or can this deliverable be considered part of the Interim Evaluation Report?
- A first draft of the Interim Evaluation Report was submitted to LDH on 10/4.

The quarterly meeting with LDH and Tulane was also held on October 12<sup>th</sup>. The main goal of this meeting was to discuss remaining data needs and analysis concerns for the Draft Interim Evaluation Report. The following items were discussed:

- LDH still anticipated providing the monthly calculations for monitoring metrics #26 and #27 by 12/1.

- Discussion of strategy for dealing with the IMD discrepancy between pre- and post-intervention calculations. LDH requested an opportunity to strategize internally how to best reconcile the discrepancy. Following the meeting Tulane sent the current calculations with Imputed Value logic.
- Input requested from LDH on potential process improvements. At this time, LDH had no plans to change any of the waiver components.
- LDH will discuss need for the Year 3 Results Report deliverable internally and get back to Tulane.

During the November Tulane internal meeting held on November 9th, each lead researcher provided an update on their analysis and shared what information, or elements were still needed. The following items were discussed:

- Finalization of the Quantitative and Cost analyses was awaiting resolution of the questions surrounding the IMD calculations and receipt of the monthly calculations of metrics #26 and #27, as discussed during the October quarterly meeting with LDH.

Other topics discussed during this meeting include:

- As of this meeting, a determination on the need for a separate Year 3 results report was still pending.
- Feedback that was received on the first draft on the Draft Interim Evaluation Report was incorporated into a second draft. The second draft was submitted to LDH on 10/28 to be posted for public review on 10/29.
- The team determined that an additional meeting with LDH was required to discuss the remaining gaps in the Draft Interim Evaluation Report. At the time, gaps included Cost Analyses, Quantitative Analyses, and Lessons Learned and Recommendations.

In lieu of the December Tulane internal meeting, a follow up meeting with LDH was held on December 9<sup>th</sup> to discuss finalizing the Draft Interim Evaluation Report. The following items were discussed:

- Quantitative Data Needs: Monthly metric calculations for monitoring metrics #26 and #27. LDH indicated that these were not available for incorporation in the Draft Interim Evaluation Report and were aiming to deliver this data in January or February. Tulane will include the data in the Year 4 Results Report
- Cost Analyses: LDH confirmed that Tulane can use the proposed Imputed Value logic for the IMD data where pre-period date is not available. They suggest including a clear description for instances where the Imputed Value data is presented to CMS.
- Draft Interim Evaluation Report: Tulane requested input from LDH on Lessons Learned and Recommendations
- The project PI will finish writing up Lessons Learned and Recommendations while the data analyses were finalized, and expected to send a final draft the following week.

- Results Report Year 3: LDH confirmed that a separate Year 3 Results report will not be required. Tulane is awaiting a response on if this deliverable will be fulfilled by the Draft Interim Evaluation report, and billable as such.
- LDH proposed recommendations on the presentation of measure #23, #24, and #25 analysis results.
- IAT measure. Tulane analysis shows no significant change, but HEDIS rates show an increase. LDH suggested including in the report that there was an increase, though not statistically significant.

As of December 31<sup>st</sup>, the following items were received from LDH:

- 1115 SUD Demonstration Waiver Administrative Cost Report – CY21 – September
- 1115 SUD Demonstration Waiver Administrative Cost Report – CY21 – October
- 1115 SUD Demonstration Waiver Administrative Cost Report – CY21 – November

### **Status of analysis by topic – December 31, 2021**

Quantitative Analyses (Lead Researcher: Dr. Kevin Callison): The Quantitative Analyses through 2020 were completed for all metrics, excluding #26 and #27. The results were presented in the Draft Interim Evaluation Report. Results for metrics #26 and #27 will be included in the Year 4 Results Report.

Cost Analyses Report (Lead researcher: Dr. Charles Stoecker): The Cost Analyses through 2020 have been completed and results were presented in the Draft Interim Evaluation Report.

Care Coordination (Lead researcher: Dr. Janna Wisniewski): The Care Coordination Analyses through 2020 have been completed and results were presented in the Draft Interim Evaluation Report.

### **DELIVERABLE STATUS**

Quarterly and Annual Reports: Quarterly reports have been submitted on deadline and have summarized the evaluation feedback process with LDH and CMS. Quarterly reports for DY4 Q1, DY4 Q2, and DY4 Q3 have been invoiced to date.

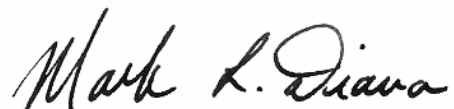
Draft Interim Evaluation Report: The final version of the Draft Interim Evaluation Report was submitted to LDH on 12/28. The report will be revised according to feedback from CMS and LDH for the Final Interim Evaluation Report submission.

Data reports: The Baseline, Year 1, Year 2, and Year 3 Data Analyses Reports were submitted as components of the Draft Interim Evaluation Report.

## USE OF FUNDS

Funds have been used for this project to cover faculty and staff time to develop the initial SUD evaluation plan, define the work timetables once the evaluation plan was approved; coordinate activity with within Tulane and with LDH, and to develop reports and associated deliverables.

Respectfully submitted,

A handwritten signature in black ink that reads "Mark L. Diana". The signature is written in a cursive, flowing style.

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