

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard, Mail Stop S2-25-26  
Baltimore, Maryland 21244-1850



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## State Demonstrations Group

March 11, 2025

John Connolly  
Assistant Commissioner for Healthcare Administration and State Medicaid Director  
Minnesota Department of Human Services  
540 Cedar Street  
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St. Paul, MN 55167-0983

Dear Director Connolly,

The Centers for Medicare & Medicaid Services (CMS) has completed its review of the Interim Evaluation Report, which is required by the Special Terms and conditions (STCs), specifically STC #41, “Interim Evaluation Report,” of the Minnesota Substance Use Disorder System Reform section 1115 demonstration (Project No: 11-W-00320/5). This demonstration was approved on July 1, 2019, and is effective through June 30, 2025. This report covers the demonstration period from January 1, 2020, through December 31, 2022, which is compared to a baseline period of January 1, 2017, to December 31, 2019. CMS determined that the evaluation report, submitted on December 22, 2023, and revised on August 12, 2024, is in alignment with the approved Evaluation Design and the requirements set forth in the STCs, and therefore, approves the state’s Interim Evaluation Report.

In accordance with STC #45 “Public Access”, the approved evaluation report may now be posted to the state’s Medicaid website within thirty days. CMS will also post the evaluation report on Medicaid.gov.

The Interim Evaluation Report evaluated a wide range of outcomes related to the evaluation goals and hypotheses to understand the demonstration’s progress in improving beneficiary access to health care, SUD service use, and health outcomes. It used a mixed-methods approach that aligns with the approved Evaluation Design. The findings in the Interim Evaluation Report indicate progress in certain demonstration goals. For example, between 2021 and 2022, there were notable increases in treatment initiation, engagement, adherence, and retention for beneficiaries with a SUD. These improvements are echoed in the 2023 provider survey, where most respondents reported being able to effectively assess patient needs and direct patients to appropriate services. However, the state has not made progress on most of its demonstration goals. Specifically, there were significant increases in readmission rates, overdose deaths, and emergency department (ED) visits following residential treatment stays. Additionally, there were substantial decreases in the number of beneficiaries receiving ambulatory or preventive

care, as well as in follow-up contact after an ED discharge. The state identified the Public Health Emergency (PHE) as a primary factor contributing to these challenges and noted that the trends align with national patterns in overdose deaths and ambulatory care utilization.

We look forward to our continued partnership on the Minnesota Substance Use Disorder System Reform section 1115 demonstration. If you have any questions, please contact your CMS demonstration team.

Sincerely,

**Danielle  
Daly -S**

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Danielle Daly  
Director  
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Monitoring and Evaluation

cc: Sandra Porter, State Monitoring Lead, CMS Medicaid and CHIP Operations Group

## **INTERIM EVALUATION REPORT**

Revised July 2024

# **Minnesota Substance Use Disorder System Reform Section 1115(a) Demonstration Project Evaluation**

**Presented by:**

NORC at the University of Chicago

**Presented to:**

Minnesota Department of Human  
Services  
Behavioral Health Division



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# Executive Summary

The following executive summary provides an overview of the Demonstration, the principal results, interpretations, and recommendations included in this interim evaluation report.

## Demonstration Summary

Minnesota's Substance Use Disorder System Reform Section 1115(a) Demonstration (the Demonstration) was approved by the Centers for Medicare & Medicaid Services (CMS) on July 22, 2020, for a demonstration period of July 1, 2019 through June 30, 2024. The Demonstration supports a full continuum of care with a focus on ensuring that individuals are matched to an appropriate level of care, based on the requirements established by the American Society of Addiction Medicine (ASAM).<sup>1</sup> In January 2021, Minnesota began officially training and providing technical assistance to substance use disorder (SUD) participating providers.

The Demonstration was designed to achieve progress toward standardized national milestones. These milestones in turn contribute to advancement in Minnesota's state-specific Demonstration goals. These goals are as follows:

1. Increased rates of identification, initiation, and engagement in treatment for SUD
2. Increased adherence to and retention in treatment
3. Fewer readmissions to the same or higher level of care (LOC) where the readmission is preventable or medically inappropriate
4. Improved access to care for physical health conditions among Medicaid beneficiaries
5. To reduce the number of opioid-related overdoses and deaths within the state of Minnesota
6. To allow patients to receive a wider array of evidence-based services that are focused on a holistic approach to treatment
7. Reduced utilization of emergency departments (EDs) and inpatient hospital settings for treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services

There were several external factors that affected the implementation and impact of the Demonstration. The effects of the COVID-19 public health emergency (PHE) included reduced access to care and increased rates of SUD diagnoses and demands for services. Then, in 2021, the Minnesota legislature passed changes that impacted the Demonstration. These legislative changes, notably the requirement of all residential and withdrawal management (WM) providers to participate in the Demonstration was a shift from the original Demonstration design that was a voluntary program for a small group of providers.

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<sup>1</sup> For more information on ASAM established levels of care please see: <https://www.revisor.mn.gov/statutes/cite/254B.19>

NORC at the University of Chicago (NORC) is the Independent Evaluator of the demonstration. The Minnesota Department of Human Services (DHS) has contracted with NORC to conduct an independent mixed-methods evaluation of the Demonstration. This interim evaluation report is part of the overall evaluation.

The target population of the Demonstration is all individuals enrolled in Minnesota Medicaid who receive any services for SUD. For most of the evaluation analyses, beneficiaries with an OUD or SUD must also satisfy criteria for specific enrollment periods. This approach is an intent-to-treat (ITT) design: the analysis includes all eligible Medicaid beneficiaries, regardless of what, if any treatment they received from certified providers. This design avoids volunteer bias that results from limiting evaluation participants to beneficiaries receiving care from participating providers.

This report evaluates the three-year period before the Demonstration (i.e., the baseline period from January 1, 2017, to December 31, 2019) and a three-year period during the Demonstration (i.e., the initial Demonstration period from January 1, 2020, to December 31, 2022). It also includes a qualitative assessment of Demonstration implementation through 2022, based on a survey of certified providers that was conducted in early 2023. Both quantitative and qualitative methods were used for this evaluation.

## Principal Results

As of April 2023, 92 unique SUD/Opioid Use Disorder (OUD) providers, operating in 171 facilities or locations, were certified in the Demonstration.

In this report, results are reported for each goal:

**Goal 1: Increased rates of identification, initiation, and engagement in treatment for SUD.** The overall number of beneficiaries with a new diagnosis of SUD increased from CY2017 (49,600) to CY2022 (53,644). Average rates of initiation of treatment within 14 days of diagnosis (**Exhibit 6**) remained relatively stable between the three-year baseline and three-year Demonstration periods. In addition, providers reported that the Demonstration is effective in assessing patients and then directed them to an appropriate LOC.

**Goal 2: Increased adherence to and retention in treatment.** The proportion of beneficiaries with an OUD initiating medication for opioid use disorder (MOUD) increased by nearly 13 percent (5.8 percentage points) between the baseline and Demonstration periods.

**Goal 3: Fewer readmissions to the same or higher level of care (LOC) where the readmission is preventable or medically inappropriate.** Despite efforts to improve care coordination and transitions, the Demonstration observed an increase in average readmission rate for beneficiaries with an SUD from 11.9 percent in the three-year baseline period to 12.5 percent during the three-year Demonstration period. The proportion of beneficiaries with any readmission increased by 0.8 percentage points during that timeframe, and the rates of readmission for beneficiaries with more than one stay also increased from 19.5 percent to 20.4 percent. However, the provider survey found that 72 percent of providers

believe the Demonstration has been effective or very effective in assessing and referring patients to the appropriate levels of care. They also reported that they can provide referrals to residential and outpatient treatment and that they are referring more patients to MOUD treatment.

**Goal 4: Improved access to care for physical health conditions among Medicaid beneficiaries.**

There was a small overall decrease in the proportion of beneficiaries with an SUD receiving ambulatory or preventive care between the three-year baseline and three-year Demonstration periods, from 94.5 percent to 92.8 percent, representing a 1.7 percentage point change. In addition, there was an increase in the number of beneficiaries with an SUD who had an ambulatory preventive care visit.

**Goal 5: To reduce the number of opioid-related overdoses and deaths within the state of Minnesota.** Minnesota did not experience a reduction in drug overdose deaths during the Demonstration period, which is consistent with national trends and trends in other states.

**Goal 6: To allow patients to receive a wider array of evidence-based services that are focused on a holistic approach to treatment.** In their work, DHS has primarily focused on the implementation of a new process and system for utilization management (UM) through the Kepro<sup>2</sup> UM program. Eighty-four percent of respondents reported that the Kepro UM was either fully or somewhat integrated into their workflows. Providers continued to underscore that Kepro UM is time-consuming and has high administrative costs. Most Demonstration providers reported that they can provide access for patients with Medicaid through referral to ASAM LOCs 1.0, 2.1, 3.1, 3.3, 3.5, and 3.7. Level 3.1—clinically managed low-intensity and population-specific services—providers reported limited bed availability and a lack of low-intensity treatment centers. Similarly, most providers can refer patients to Level 3.3—clinically managed high-intensity and population-specific services—but providers face challenges finding openings. When asked about staffing adequacy for delivering treatment to Demonstration participants in the provider survey, 23 out of 25 respondents selected “Strongly Agree” or “Agree.” Providers who felt that they did not have adequate staffing noted that additional administrative support and mental health professionals are needed to support the treatment of Demonstration participants.

**Goal 7: Reduced utilization of emergency departments (EDs) and inpatient hospital settings for treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services.** We observed progress toward the state’s target of follow-ups after ED visit for alcohol and other drug (AOD) use or dependence. We observed no change in ED utilization per 1,000 beneficiaries for SUD, but there was an increase in ED visits following discharge from a residential treatment facility between CY2019 and CY2021, and a decrease in follow-up after ED visit for AOD use or dependence during the same time period; however, rates of ED visits post-discharge from residential treatment and follow-up after ED visit for AOD use or dependence declined in CY2022.

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<sup>2</sup> In late 2022, Kepro and CNSI (a provider of innovative healthcare technology products) merged and in June 2023 the combined company rebranded as Acentra Health. Since this report refers to activities that happened prior to the rebrand, the organization is referred to as Kepro. More information can be found here: <https://acentra.com/about-us/>.

## Interpretation

Given the challenges of the COVID-19 PHE, the results of this evaluation are likely atypical for the anticipated change for some measures. Comparisons with other state trends are not possible due to the varying nature and timing of the intensity of the PHE. These analyses only include data through 2022. In addition, the number of providers certified in the Demonstration has grown since the 2021 legislative mandate passed that required all residential and WM providers to certify in the Demonstration and meet provider standards requirements by January 1, 2024. In addition to the 2021 mandate, several factors support the hypothesis that the Summative Evaluation Report results may look different:

- Staffing. State staffing challenges, including a hiring freeze, staff shortages, and staff turnover during the COVID-19 PHE.
- Beneficiaries. This report does not include the experiences and perception of the patients covered by the waiver and served by Demonstration providers.
- Enhanced rates. The requirement for residential (and outpatient providers) participation in the model, along with enhanced payment rates, may lead to increased access to services at these facilities for beneficiaries.
- Implementation of direct access. This change could expand beneficiary choice, enable quicker referrals to access SUD services, and improve care coordination.
- MOUD prescribing. The state expects an increase in the number of providers actively prescribing MOUD due to state-wide initiatives to expand eligibility for prescribing as well as removal of the requirement for a Drug Enforcement Administration (DEA) “X-waiver” to prescribe buprenorphine.

## Recommendations of the Evaluation

Minnesota could consider the following actions:

- Collaborate with providers to examine what is needed to improve follow-up services, from the ED as well as any treatment services, such as improved infrastructure or more personnel.
- Continue examining how to obtain comprehensive information on the health workforce that serves Medicaid beneficiaries.
- Consider mechanisms to monitor and assess the quality of care provided through managed care. For example, some states have used financial incentives tied to one or more SUD care continuum performance measures to enforce quality of care.
- Maintain commitment to telehealth for SUD services.

In addition, data on MCO utilization review processes was not available for this evaluation. While MCOs are obligated to align their utilization review process with that of the state, DHS may also consider implementing a survey of organizations to capture other data that may inform DHS about treatment quality and adequacy. General Background Information

## Introduction

On May 31, 2016, the governor of Minnesota signed Minn. Stat. § 254B.15, directing the DHS commissioner to design a reform of Minnesota’s SUD treatment system in order to ensure that a full continuum of care is available for individuals with SUDs.<sup>i</sup> In fulfilling this statute under the authority of Minnesota Statutes, section 256B.0759,<sup>ii</sup> the Minnesota Substance Use Disorder System Reform Section 1115(a) Demonstration Project (the Demonstration) from the DHS Behavioral Health Division was approved by the Centers for Medicare & Medicaid Services (CMS) on July 22, 2020. The Demonstration supports access to a full continuum of care, with a focus on ensuring that individuals are matched to an appropriate level of care (LOC). With Minnesota’s American Society of Addiction Medicine (ASAM) LOC requirements published in October 2020 and the monitoring protocol approved on January 5, 2021, Minnesota officially began the rollout of training and technical assistance (TA) to participating providers on January 14, 2021.

The state of Minnesota has contracted with NORC to conduct an independent evaluation of the Demonstration. NORC is an objective, nonpartisan research institution that delivers reliable data and rigorous analysis to guide critical programmatic, business, and policy decisions. NORC is conducting an independent mixed-methods evaluation of the Demonstration for DHS, informed by NORC’s experience in developing and implementing rigorous qualitative and quantitative data collection and analytic approaches. This interim evaluation report is part of the overall evaluation.

## Demonstration Policy Goals

Minnesota is pursuing a multi-agency strategy to make SUD treatment more accessible and integrated with the larger health care system. The Demonstration is structured with respect to seven state-specific goals:

- Goal 1. Increased rates of identification, initiation, and engagement in treatment for SUD
- Goal 2. Increased adherence to and retention in treatment
- Goal 3. Fewer readmissions to the same or higher LOCs where the readmission is preventable or medically inappropriate
- Goal 4. Improved access to care for physical health conditions among Medicaid beneficiaries
- Goal 5. To reduce the number of opioid-related overdoses and deaths within the state of Minnesota
- Goal 6. To allow patients to receive a wider array of evidence-based services that are focused on a holistic approach to treatment
- Goal 7. Reduced utilization of EDs and inpatient hospital settings for treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services

These state-specific goals are designed to achieve progress toward the following six standardized national milestones:

1. Access to critical level of care for SUDs
2. Use of evidence-based SUD-specific patient placement criteria
3. Use of nationally recognized, evidence-based, SUD program standards to set residential treatment provider qualifications
4. Sufficient provider capacity at each LOC, including medication-assisted treatment (MAT)<sup>3</sup>
5. Implementation of comprehensive treatment and prevention strategies to address opioid abuse and OUD
6. Improved care coordination and transition between levels of care

In 2019, the Minnesota legislature expanded the SUD treatment services covered under the state plan to include comprehensive assessment, treatment coordination, peer recovery and support services, and residential withdrawal management.<sup>4</sup> The state plan includes coverage of outpatient services (i.e., treatment coordination and peer support), counseling, withdrawal management, intensive levels of care in residential and inpatient settings, and MOUD. In October 2019, CMS approved a state plan amendment to cover screening, brief intervention, and referral to treatment (SBIRT). MOUD was previously provided in conjunction with outpatient and residential treatment services. The use of all U.S. Food & Drug Administration (FDA)–approved medications for treating OUD is supported and encouraged by DHS and will be expanded under the Demonstration. In 2020, the state approved a 15 percent rate increase for the treatment portion of residential services and a 10 percent rate increase for outpatient treatment services delivered through the Demonstration.<sup>iii</sup>

In addition to the rate increase, the adoption of the ASAM levels of care provides a framework for Minnesota’s SUD continuum of care. Beginning in the early 1990s, the ASAM developed, validated, and refined a six-dimension model to assess the level and intensity of treatment needed for a given individual at a specific time.<sup>iv</sup> These dimensions include: 1) acute intoxication and potential for withdrawal; 2) biomedical conditions, complications, and past history; 3) emotional, behavioral, and cognitive conditions; 4) readiness to change; 5) relapse, continued use, or continued problems; and 6) recovery and living environment. Based on measures within each of these dimensions and in combination, applying the ASAM criteria results in a clinical recommendation for treatment services ranging from early intervention (at the low end of the scale) to medically managed intensive inpatient services (at the high end).

Before the start of the Demonstration, Minnesota implemented evidence-based placement criteria that were based on the ASAM six-dimensions model. To meet the goal of fully aligning the Minnesota Medicaid SUD

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<sup>3</sup> MAT is also referred to as medication for opioid use disorder (MOUD).

<sup>4</sup> Support services include services to help people overcome personal and environmental obstacles to recovery, assist the newly recovering person into the recovery community, and serve as a personal guide and mentor toward the achievement of goals. See “Minnesota Substance Use Disorder Section 1115 Waiver Implementation Plan” submitted to CMS on September 27, 2019.

care system with the ASAM LOCs, Minnesota is using a mix of the Demonstration, pilot programs, licensing reforms, and other regulatory tools to establish a comprehensive continuum of care.<sup>5</sup>

On December 2023, Minnesota submitted a request to extend the Demonstration. The renewal application acknowledges the barriers faced in legislation and in moving to a standardized model (as developed by ASAM) of SUD delivery, and it provides plans for continuing to make progress on the existing milestones. On May 30, 2024 CMS approved a temporary extension of the Demonstration to allow the state and CMS to continue negotiations on the extension application.

## Demonstration Overview

The Demonstration tests new ways to strengthen the state's behavioral health care system by improving access to treatment for the ASAM critical levels of care.<sup>v</sup> The action items described in the implementation plan aim to strengthen the state's behavioral health care system by improving access to the ASAM levels of care through:

- Implementing new federal Medicaid funding opportunities for SUD services provided to patients in intensive residential settings (i.e., institutions for mental diseases [IMDs]) that have established referral arrangements with other SUD providers to create a continuum of care network
- Increasing the use of evidence-based placement assessment criteria and matching individual risk with the appropriate ASAM LOC to ensure that beneficiaries receive the treatment they need
- Establishing a network of providers interested in providing the comprehensive continuum of ASAM LOCs to individuals in need of SUD treatment

Providers who participate in the Demonstration are required to establish and maintain formal patient referral arrangements to ensure access to the ASAM critical levels of care defined by the state. As of 2024, providers must implement the standards set by ASAM for the respective level of care and must meet pre-determined level of care requirements.<sup>6</sup>

Providers also have access to training and TA on The ASAM Criteria and the program modifications needed to assure that service delivery models align with these standards. Payment rates for participating providers are increased to support their transition to the ASAM-based standards.

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<sup>5</sup> For more details on the ASAM continuum of care, please see <https://edocs.dhs.state.mn.us/lfserver/Public/DHS-7326-ENG>.

<sup>6</sup> Information on each level of care requirements can be found in the Minnesota Statutes, section 254B.19, subdivision 1 here: <https://www.revisor.mn.gov/statutes/cite/254B.19>

## Legislative Changes

In 2021, the Minnesota legislature passed additional changes that affected the Demonstration.<sup>vi</sup> Key among these was the mandatory participation of licensed residential SUD and withdrawal management (WM) providers. These changes included:

- Requiring mandatory certification for 245G-licensed residential SUD providers and licensed 245F WM providers by January 2024, including out-of-state SUD and WM providers receiving payment through the Minnesota Health Care Program (MHCP) for eligible recipients<sup>7</sup>
- Enhancing the payment rate for outpatient treatment services, MOUD, and adolescent treatment programs from 10 percent to 20 percent
- Enhancing the rate for residential treatment services from 15 percent to 25 percent
- Clarifying the base pay rate for medium-intensity residential program participation
- Requiring public posting of data and outcome measures
- Requiring DHS to seek federal approval for extension of the Demonstration
- Requiring DHS to convene an evaluation work group for the Demonstration

As originally designed, the Demonstration was a voluntary program for a smaller group of providers among the state's more than 400 SUD provider organizations. However, the 2021 legislative mandate for all residential and withdrawal management providers to participate was a shift from the initial limited participation of key segments of the SUD/ODU treatment continuum. SUD treatment providers certified in the Demonstration must ensure that certain requirements are implemented. DHS contracted with Kepro,<sup>8</sup> a utilization management vendor that uses an integrated platform for quality oversight, care management, and assessment and eligibility. Kepro is conducting utilization reviews of the services delivered to monitor compliance with ASAM criteria.

To ensure the success of SUD system reform, the 2021 legislature implemented changes that resulted in a shift to the mandatory statewide program for all residential and WM providers. Withdrawal management programs, versus detoxification programs, encourage people to consider treatment, provide a higher level of medical services to assist with more acute withdrawal symptoms, and contain additional program service requirements to encourage all patients to enter programs for ongoing recovery. IMDs (facilities certified and approved in the Demonstration) can now bill for WM provided at IMDs, which used to be paid for by the state Behavioral Health Fund (BHF). A licensed WM provider, regardless of IMD status, is also eligible to receive payment for WM services. Hospitals are exempt

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<sup>7</sup> By January 1, 2024, programs licensed by DHS as residential treatment programs that receive payment under this chapter must certify as demonstration project providers and meet the requirements of subdivision 3. More information can be found at: <https://www.revisor.mn.gov/statutes/cite/256B.0759>

<sup>8</sup> In late 2022, Kepro and CNSI (a provider of innovative healthcare technology products) merged and in June 2023 the combined company rebranded as Acentra Health. Since this report refers to activities that happened prior to the rebrand, the organization is referred to as Kepro. More information can be found here: <https://acentra.com/about-us/>.

from WM licensing requirements and are therefore eligible vendors of WM services. Licensed WM providers must certify in the Demonstration by January 1, 2024, regardless of IMD status.

In May 2023, the Minnesota legislature passed additional changes to state law. These changes included:

- Establishing ASAM LOCs 0.5, 1.0, 2.1, 2.5, 3.1, 3.3, 3.5
- Requiring all outpatient programs to certify their ASAM level of care with DHS by January 1, 2025
- Requiring all hospital-based residential programs must certify with DHS by January 1, 2025<sup>9</sup>

In addition, a grant provision in the governor's 2024 Budget Recommendations provides funding for startup and capacity-building grants for WM services.

DHS has also begun a contract (as mandated in the 2021 legislation) for a SUD community of practice (CoP), to be implemented from December 2022 until June 30, 2025, to "improve treatment outcomes for individuals with substance use disorders and to reduce disparities by using evidence-based and best practices through peer-to-peer and person-to-provider sharing."<sup>vii</sup> The CoP will consist of behavioral health care providers from various disciplines and professional levels, consumers, family members, researchers, recovery peers, and advocates. The goals of the CoP include the identification of challenges to implementing ASAM criteria, including gaps in SUD treatment services, supportive services, and using culturally specific models to address barriers to care across diverse communities.

Rate increases for certified providers were established when the demonstration was enacted in 2019, with increases of 15 percent for residential providers and 10 percent for outpatient providers. The rates increased an additional 10 percent in 2021, for total increases of 25 percent for residential providers and 20 percent for outpatient providers by January 1, 2022. As of July 1, 2022, the Direct Access program was fully implemented. Under Direct Access, individuals can go directly to a provider they choose to receive a comprehensive assessment and access care immediately.<sup>10</sup> During the 2023 legislative session an increase in capitation payments to managed care and county-based purchasing plans for behavioral health services was approved. These capitation rate increases, effective January 1, 2024, must be used to increase payment rates to behavioral health service providers. Also approved during the 2023 legislative session was funding to strengthen workforce capacity. With this funding, the DHS Behavioral Health Division will be able to hire approximately 30 new full-time employees. Recommendations for supportive housing are also included in the governor's 2024 human services budget, discussed below in the Interactions with Other State Initiatives section.

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<sup>9</sup> In a 2024 statute update, ASAM 3.7 medically monitored inpatient programs were exempted from this requirement.

<sup>10</sup> Minnesota Department of Human Services. Direct Access. <https://mn.gov/dhs/partners-and-providers/news-initiatives-reports-workgroups/alcohol-drug-other-addictions/sudreform/>

## Impact of the COVID-19 PHE on Demonstration Implementation

In March 2020, Minnesota had just begun implementing its Demonstration when the COVID-19 PHE emerged, and a public health emergency (PHE) was declared.<sup>11</sup> As the state described in its quarterly Medicaid Section 1115 SUD Demonstration Monitoring Reports, staff shortages, increase in COVID-19 cases, and other issues resulted in outpatient and residential facilities reducing admissions or discontinuing services. The monitoring metrics and the data in this report reflect these impacts.

The state also experienced a simultaneous increase in SUD diagnoses and demands for services during the PHE; these increases in use and unmet treatment needs mirrored national trends during the same time.<sup>viii, ix, x</sup> Moreover, barriers to accessing treatment and an overall reduction in documented health care seeking were reported.<sup>xi, xii</sup> At the same time, changes to buprenorphine access rules at the state and federal levels, as well as state legislation to expand telehealth, might have increased access to services, although it is outside the scope of this report to determine the impact of these effects.

As in other states,<sup>xiii</sup> Minnesota also experienced resource and staffing shortages throughout the PHE.<sup>xiv, xv</sup> State staff reported during interviews conducted for the midpoint assessment (MPA) that, although there was some progress on billing system changes and some legislative progress on related initiatives, such as Direct Access, there was a general slowdown in waiver implementation. However, DHS was able to overcome some of the resource shortages, as they implemented Direct Access for treatment and established new billing processes for SUD services.<sup>12</sup> In 2022 and 2023, to support the SUD reform and Demonstration requirements, DHS continued to enhance its operations, identifying and funding administrative positions to support certification, training, and monitoring.

## Population Groups Impacted by the Demonstration

All persons with full Medicaid coverage are eligible for the services provided by the Demonstration. Some claims-based metrics were limited to persons with continuous enrollment as defined by DHS.<sup>13</sup> A further subset of claims-based measures is reported on the members of the beneficiary population who have an OUD. The target population largely consists of persons with an SUD and individuals 18 to 64 years of age. The Demonstration is statewide.

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<sup>11</sup> The Centers for Disease Control and Prevention states that the World Health Organization declared COVID-19 a global pandemic on March 11, 2020.

<sup>12</sup> Direct Access refers to eligible members' ability to select the SUD provider from whom they want to receive services, including assessment and treatment.

<sup>13</sup> The major programs that are considered full coverage are: MA, NM, RM, IM, KK, LL, FF, JJ, BB, XX. Please see the following link for a description of each major program: [https://www.dhs.state.mn.us/ID\\_008922#recipient](https://www.dhs.state.mn.us/ID_008922#recipient).

## Demonstration Goals, Waiver Milestones, and Evaluation Questions

In **Exhibit 1**, we list the evaluation questions addressed in this report and describe how they align with the Demonstration goals and the six CMS-required milestones (listed below), along with the quantitative and qualitative data used in this report to assess progress toward the goals. In addition to the data analysis undertaken in this report, we incorporate findings and updates to information from the implementation plan developed by the DHS, as well as NORC’s findings in the Baseline Provider Capacity Assessment and MPA.

### CMS-Required Milestones

1. Access to critical levels of care for SUDs
2. Widespread use of evidence-based, SUD-specific patient placement criteria
3. Use of nationally recognized, evidence-based, SUD program standards to set residential treatment provider qualifications
4. Sufficient provider capacity at each LOC, including MAT
5. Implementation of comprehensive treatment and prevention strategies to address opioid abuse and OUD
6. Improved care coordination and transitions between LOCs

**Exhibit 1.** Demonstration goals, evaluation questions, demonstration milestones, and measure or qualitative data

Minnesota Demonstration Goal	Demonstration Milestone						Measure or Qualitative Data in This Report
Goal 1. Increased rates of identification, initiation, and engagement in treatment for SUD	1	2	3	4	5	6	
<i>Hypothesis: The Demonstration will increase the share of beneficiaries who are identified and treated for OUD/SUD in ways that are consistent with evidence-based care.</i>	✓			✓			

Minnesota Demonstration Goal	Demonstration Milestone						Measure or Qualitative Data in This Report
1. To what extent did implementation of the 1115 SUD Demonstration result in increased screening and identification of members with SUD? 2. Did efforts to improve initiation and engagement facilitated by the 1115 SUD Demonstration result in Minnesota Medicaid beneficiaries with SUD, including OUD, receiving more treatment for SUD?							Quantitative, claims-based: <ul style="list-style-type: none"> <li>Percentage of beneficiaries with engagement in alcohol and other drug-dependence treatment</li> <li>Percentage of beneficiaries with initiation in alcohol and other drug-dependence treatment</li> <li>Time to treatment</li> </ul> Quantitative, non-claims-based: <ul style="list-style-type: none"> <li>Number of enrolled at each level of care</li> </ul> Qualitative: <ul style="list-style-type: none"> <li>MN Provider Survey</li> </ul>
Goal 2. Increased adherence to and retention in treatment	1	2	3	4	5	6	
<i>Hypothesis: The Demonstration will improve adherence to treatment plans.</i>	✓	✓	✓			✓	
1. To what extent and how did implementation of the 1115 SUD Demonstration result in improvement in: <ol style="list-style-type: none"> <li>Adherence to the plan of treatment?</li> <li>Retention of Minnesota beneficiaries with SUD in addiction recovery management?</li> <li>Duration of pharmacotherapy, including MAT for OUD, among Minnesota beneficiaries?</li> </ol>							Quantitative, claims-based: <ul style="list-style-type: none"> <li>Follow-up after IMD stay, for persons with alcohol and other drug (AOD) use or dependence, persons with alcohol or other SUD and discharged from an IMD with a follow-up visit within 7 and 30 days of discharge</li> <li>Follow-up after ED visit for AOD use or dependence</li> <li>Percentage of patients with OUD prescribed MAT</li> <li>Continuity of pharmacotherapy for OUD</li> </ul> Qualitative: <ul style="list-style-type: none"> <li>MN Provider Survey</li> </ul>
Goal 3. Fewer readmissions to the same or higher LOCs where the readmission is preventable or medically inappropriate	1	2	3	4	5	6	
<i>Hypothesis: The Demonstration will reduce readmissions to the same or higher LOC among beneficiaries with SUD.</i>		✓	✓	✓			

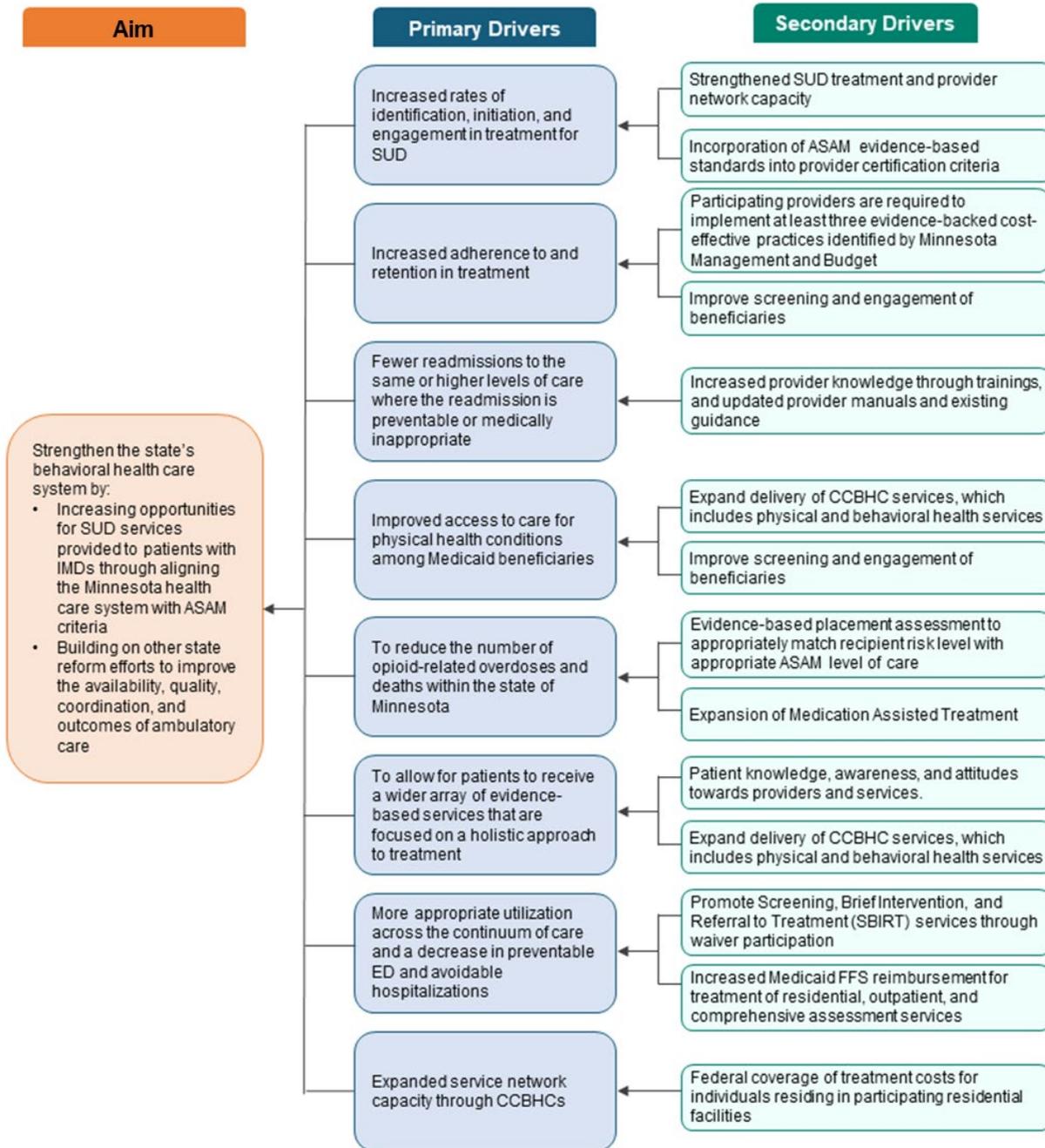
Minnesota Demonstration Goal	Demonstration Milestone						Measure or Qualitative Data in This Report
1. Did the more comprehensive continuum of covered SUD services and care facilitated by the 1115 SUD Demonstration result in fewer readmissions to the same or higher LOC among beneficiaries with SUD?							Quantitative, claims-based: <ul style="list-style-type: none"> <li>All-cause readmissions during the measurement period among beneficiaries with SUD: The count of 30-day readmissions: <math>\geq 1</math> acute readmission for any diagnosis within 30 days of the index discharge date for beneficiaries with an SUD</li> </ul>
Goal 4. Improved access to care for physical health conditions among Medicaid beneficiaries	1	2	3	4	5	6	
<i>Hypothesis: The Demonstration will increase use of preventive health services.</i>	✓			✓			
1. Did beneficiaries increase use of preventive health services after implementation of the 1115 Demonstration? 2. Do SUD services providers believe that access to care for physical health conditions has improved since implementation of the 1115 SUD Demonstration?							Quantitative, claims-based: <ul style="list-style-type: none"> <li>Percentage of beneficiaries with an SUD receiving ambulatory or preventive care</li> </ul>
Goal 5. To reduce the number of opioid-related overdoses and deaths within the state of Minnesota	1	2	3	4	5	6	
<i>Hypothesis: The demonstration will decrease the mortality rate among Minnesota beneficiaries with SUD/OD.</i>		✓	✓		✓		
1. Did the mortality rate among Minnesota beneficiaries with SUD/OD decrease after implementation of the 1115 Demonstration? 2. Did overdose-related mortality rates among Minnesota beneficiaries with SUD/OD decrease after implementation of the 1115 SUD Demonstration?							Quantitative, MN cause of death data linked to Medicaid enrollment data: <ul style="list-style-type: none"> <li>OD mortality rate</li> </ul>
Goal 6. To allow patients to receive a wider array of evidence-based services that are focused on a holistic approach to treatment	1	2	3	4	5	6	
<i>Hypothesis: The Demonstration will increase the share of beneficiaries who are treated for OUD/SUD in ways that are consistent with evidence-based care.</i>	✓			✓			
1. What are the challenges to implementing ASAM’s critical levels of care? 2. To what extent and how did implementation of the 1115 SUD Demonstration result in the incorporation of evidence-based standards into SUD treatments? 3. To what extent did the 1115 SUD Demonstration enable providers to deliver the comprehensive continuum of services and care for SUD and OUD?							Qualitative: MN Provider Survey

Minnesota Demonstration Goal	Demonstration Milestone						Measure or Qualitative Data in This Report
Goal 7. Reduced utilization of EDs and inpatient hospital settings for treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services	1	2	3	4	5	6	
<i>Hypothesis. The Demonstration will reduce the utilization of EDs, avoidable hospitalizations, hospitalizations for ambulatory-care-sensitive conditions, and intensive inpatient services.</i>				✓	✓		
1. Did implementation of the 1115 SUD Demonstration result in the following, among Medicaid beneficiaries with SUD, after receipt of treatment services: <ol style="list-style-type: none"> <li>Improved use of preventive care?</li> <li>Reduced ED utilization?</li> <li>Fewer avoidable hospitalizations?</li> <li>Fewer hospitalizations for ambulatory-care-sensitive conditions?</li> <li>Fewer avoidable hospitalizations during and after receipt of addiction recovery management services?</li> </ol>							Quantitative, claims-based: <ul style="list-style-type: none"> <li>ED visits following discharge from treatment</li> <li>Follow-up after ED visit for alcohol and other drug misuse or dependence</li> <li>ED utilization per 1,000 beneficiaries for SUD</li> </ul>

## Demonstration Driver Diagram

**Exhibit 2** illustrates the primary and secondary drivers for the Demonstration’s aim of strengthening the state’s behavioral health system by increasing opportunities for SUD services provided to patients at IMDs through aligning the Minnesota health care system with ASAM criteria and building on other state reform efforts to improve the availability, quality, coordination, and outcomes of ambulatory care.

**Exhibit 2.** Demonstration driver diagram<sup>14</sup>



<sup>14</sup> Certified Community Behavioral Health Clinic (CCBHC) an integrated clinic and service delivery model that uses a cost-based reimbursement structure. Source: <https://mn.gov/dhs/partners-and-providers/policies-procedures/behavioral-health/ccbhc/>

# Methodology

## Evaluation Design

The evaluation approach is guided by the goals of the Demonstration. **Exhibit 3** presents our overall evaluation approach to addressing the research questions, including data sources and analytic methods. The claims-based measures for this interim evaluation report align with the CMS monitoring protocol. For the Summative Evaluation Report, we will include additional metrics and use quarterly data (where applicable) to establish quarterly and annual trends in an interrupted time-series design. For reasons related to the timing of the Demonstration implementation, this report does not include all metrics.

While the 1115 Demonstration period is July 1, 2019 through June 30, 2024, the implementation plan was approved on July 22, 2020. Therefore, the state began receiving federal financial participation for services provided to beneficiaries from that date onwards, delaying the implementation until 2020.<sup>15</sup> This report examines the three-year period baseline period before the Demonstration (January 1, 2017 to December 31, 2019) and a three-year period during the Demonstration (January 1, 2020 to December 31, 2022). The baseline period includes a 12-month ramp-up period of calendar year (CY) 2019 to account for delayed implementation. During CY2019, changes to the provider manual regarding ASAM LOCs were disseminated, provider trainings initiated, and service coverage changes were implemented. It also includes a qualitative assessment of Demonstration implementation through 2022 based on a survey of certified providers that was conducted in early 2023. Data are structured on a calendar year. Apart from inclusion of CY2019 in the baseline period, there are no further restrictions on the time period assessed for the Demonstration phase due to the COVID-19 PHE.

## Evaluation Measures and Sources

To increase the use of nationally recognized SUD-specific program standards under the third milestone, DHS took a variety of actions related to the goals to increase adherence to and retention in treatment, fewer readmissions to the same or higher LOCs where the readmission is preventable or medically inappropriate, and reduce the number of opioid-related overdoses and deaths in the state. Data from a recent provider survey is also presented below to provide context for provider experience under the Demonstration. Providers reported about their ability to refer to other LOCs and any organizational changes they undertook as part of their participation in the Demonstration.

**Exhibit 3** provides a description of the data sources used for the interim evaluation report.

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<sup>15</sup> For more information on CMS' review of the implementation plan and approval, please see the Minnesota Substance Use Disorder Section 1115 Waiver Implementation plan here: <https://www.medicaid.gov/medicaid/section-1115-demonstrations/downloads/mn-sud-reform-sud-imp-hit-plans-appvl-10012019.pdf>

**Exhibit 3.** Data sources used in the interim evaluation report

Data Sources	Description
Claims-based measures	DHS provided NORC with files for 11 measures from the Minnesota Medicaid Management Information system.
Provider survey	NORC completed an online survey of all certified provider organizations on the implementation of the Demonstration.
DHS Minnesota Substance Use Disorder System Reform Demonstration CMS Monitoring Reports Part B	The state provided NORC with CMS Part B Monitoring Reports for Demonstration Year 1/Quarter 2 through Demonstration Year 4/Quarter 2 that included narrative descriptions of the progress toward each milestone and Demonstration implementation.
OUD mortality data	DHS provided NORC with data from state death certificates that included cause of death, linked to the beneficiary Medicaid enrollment files.
Implementation plan	NORC assessed progress toward completing the actions identified in the implementation plan.
Midpoint assessment	NORC's prior findings in the midpoint assessment are used to inform qualitative progress on goals and identify areas for opportunity for improvement and integration with other state initiatives.
Baseline provider capacity assessment (PCA)	NORC reviewed the baseline PCA to identify progress toward areas of improvement indicated in the baseline PCA.
State documents	DHS provided NORC with written responses to questions identified by the NORC evaluation team, the state's request for proposals for a contractor to support the state in the development of the SUD community of practice, the state's request for proposals for a contractor to minimize regulatory paperwork and improve systems for SUD programs.
Kepro utilization management report	DHS provided NORC with a document summarizing findings from Kepro's quality and utilization management report.
Supporting literature	We reviewed existing peer-reviewed and gray literature <sup>16</sup> to contextualize the impacts from COVID and to understand Medicaid policy options that DHS may want to consider in support of progress toward Demonstration goals.

<sup>16</sup> Gray literature is information that falls outside the mainstream of published journal and monograph literature, not controlled by commercial publishers, and includes sources such as reports, conference abstracts or papers, and governmental or private sector research. Source: <https://www.nihlibrary.nih.gov/services/systematic-review-service/literature-search-databases-and-gray-literature>

## Analytic Methods

### Claims-Based Measures

**Target group.** The target population of the Demonstration is all individuals enrolled in Medicaid who receive any services for SUD. For most analyses, beneficiaries with an OUD or SUD (a qualifying claim that uses an OUD/SUD diagnosis code as the primary diagnosis) must also satisfy criteria for specific enrollment periods (e.g., continuous enrollment). This approach is an intent-to-treat (ITT) design: the analysis includes all eligible Medicaid beneficiaries, regardless of what, if any, treatment they received from certified providers. This ITT design avoids the volunteer bias from limiting the evaluation to only beneficiaries who received care from participating providers. Currently only residential providers are required to participate and must certify by 2024. We examined all metrics at the beneficiary level and conducted event-level analyses for a subset of measures.

**Comparison group.** The use of an ITT design and the lack of an available out-of-state or within-state control group precludes a comparison group. All providers are eligible for participation in the Demonstration, and all Medicaid beneficiaries with an SUD/OUD are eligible for services (although some outcome measures require full benefits and specific enrollment duration for inclusion in analyses). Both of these factors limit the construction of a comparison group. Providers who do not participate may be different in unobserved ways from those who do participate with respect to factors that are not captured in claims data (such as case mix at facilities, geographic distances, staff mix and credentials across the referral network, and telehealth capabilities). At the same time, the state anticipates a “spillover” effect of establishing ASAM criteria statewide: Providers in the state are expected to engage with ASAM guidelines, although nonparticipating providers will not be required to demonstrate adherence to ASAM criteria. Nonparticipating providers may adopt the ASAM framework, as this approach becomes part of the culture of care in the state, and the evaluation would have no way of knowing if this is occurring. Furthermore, beneficiary placement is expected to be made on the basis of ASAM LOC guidelines. It may be that more severe cases are assigned to providers with a greater treatment capacity. For example, patients’ SUD severity may influence which IMD they are referred to, and the capacity to manage severe patients may be associated with participation in the Demonstration. Comparisons to patients with private coverage are not appropriate due to differences in social risk factors and other unmeasurable barriers to health that Medicaid patients may have that are not typically present in a commercially insured population. We compare outcomes for beneficiaries in the baseline and demonstration periods.

## Quantitative Methods

We computed descriptive statistics for the target population in the baseline and Demonstration periods. We used serial cross-sectional and pre-post analysis to test hypotheses concerning the research questions related to program reach and impact.

**Descriptive summary statistics.** Summary statistics are reported to characterize the baseline period and Demonstration period populations with respect to demographic characteristics, number of months of coverage, dual-eligibility status, distribution of the populations among the prevention regions (PRs), and the presence of OUD and chronic conditions.

**Multivariable regression analysis.** We used a serial cross-sectional and pre-post design, implemented in generalized linear multivariable regression models with the appropriate distribution model (logistic models for binary outcomes and linear regression for event-level analyses), and report adjusted outcomes, testing for significant differences (at  $\alpha = .05$ ) between each year and between the baseline and Demonstration periods. Adjusted regression models controlled for differences in duration of coverage, demographics (age, race/ethnicity, sex), dual eligibility with Medicare, and five of the most prevalent chronic conditions (asthma, depression or anxiety, liver disease, arthritis, and diabetes), and the distribution of the beneficiaries among the seven DHS PRs.<sup>17</sup> For outcomes not specifically assessed for beneficiaries with an OUD diagnosis, we also adjusted for a diagnosis in the past 12 months. We clustered standard errors at the beneficiary level to account for repeated observations of the same beneficiaries in the data over time. We report outcomes observed during the three-year baseline period before the Demonstration implementation date, using calendar years January 1, 2017, to December 31, 2019, and an initial Demonstration period from January 1, 2020, through December 31, 2022. The baseline period includes 2019 as ramp-up period prior to the implementation of the waiver in 2020. Results are presented in tables and graphs.

**Unadjusted overdose deaths analysis.** As part of Goal 5, we reported the unadjusted number and rate of deaths per 1,000 Medicaid beneficiaries and rate per beneficiaries with OUD for the latter. This is consistent with CMS metrics 26 and 27 for drug overdose deaths. DHS provided these counts, using data from the MN Department of Health database, linked to Medicaid beneficiary enrollment data to report on overall death rates. Overdose deaths are those from the International Classification of Diseases-10 (ICD-10) codes for underlying cause of death: X40-X44 (unintentional drug poisonings), X60-X64 (suicidal drug poisonings), X85 (homicidal drug poisoning), and Y10-Y14 (drug poisoning of undetermined intent). OUD deaths are those resulting from T40.1 (heroin), T40.2 (natural and semisynthetic opioids), T40.3 (methadone), and T40.4 (synthetic opioids other than methadone).

## Qualitative Methods

To strengthen NORC's understanding of perspectives on implementation of the Demonstration and its outcomes, we conducted two qualitative data collection activities. First, NORC conducted a voluntary survey aimed to reach all certified Demonstration providers. Second, NORC completed a document review of the baseline, midpoint, and quarterly monitoring Part B reports for Demonstration years three and four. These documents informed NORC's survey data collection and analysis. The survey was conducted using the Qualtrics online survey platform and consisted of 19 closed and open-ended

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<sup>17</sup> See the Regional Prevention Coordinators website for the counties in each region of Minnesota: <https://rpcmn.org/index.php>.

questions. Twenty-five providers responded to the survey, which was conducted from January 24, 2023, to March 17, 2023. The reported provider survey data reflect the implementation experiences of those providers. The 25 respondents represent all ASAM critical LOCs and 97 facility locations that bill for 45 different national provider identifiers. There was only one respondent providing Level 3.3, clinically managed high-intensity and population-specific services. Many respondents represent providers and facilities in the Minneapolis-Saint Paul region, but there were also respondents from central and southern regions of the state.

For the Summative Evaluation Report, NORC will conduct primary data collection through a series of in-depth interviews with beneficiaries and other key Demonstration participants, including consumer advocates, providers, managed care plans, and state Medicaid staff members. The beneficiary interviews will aim to understand recent experiences in accessing SUD-related care, barriers, and facilitators to obtaining SUD treatment, and ways in which health insurance can better support access to care. These will be done at the end of the fourth Demonstration year (reflecting the delay in implementation of the Demonstration), as this will allow a better understanding of the changes that have occurred during the Demonstration period.

## Methodological Limitations

**Data availability.** The study period for this interim report was limited to a three-year period post-demonstration to accommodate claims data availability and to align with CMS reporting requirements. Data was further aggregated to the annual level to facilitate alignment with metric calculation and to limit the burden to the DHS.

**Analytic Approach:** The analyses of claims-based measures in this report include a trend analysis for the change over the six-year period, and for the pre- and post-demonstration periods. Due to anticipated difficulties with the interpretation of quarterly fluctuations in light of the recent COVID-19 public health emergency, we've used annual data rather than quarterly data in this report. The Summative Evaluation Report will use a quarterly data analysis and interrupted-time series to enable a deeper understanding of the trends before and during the Demonstration.

**Measures.** Because of the limitations in time and advance preparation, and the difficulty in determining progress with the Demonstration during the COVID-19 PHE, the scope of the interim evaluation report is a more limited set of measures and analyses. **Exhibit 4** provides an overview of claims-based measures that were included in the Evaluation Design but are excluded in this report, along with an explanation for why each measure is excluded and whether each measure will be included in the Summative Evaluation Report. The table is organized by goal and hypothesis. In addition to the measures listed in the table below, we will explore alternative data sources and measures to further clarify and supplement findings in each goal. The Summative Evaluation Report will include additional metrics as more providers become approved for each level of ASAM care. Apart from examining trends

in medication for OUD in urban and rural areas, we do not report results for any subgroups, noting cautious interpretation of all results in this report due to the impact of the COVID-19 PHE. We did not conduct subgroup analyses for children and adults, since the number and proportion of children with results for each measure was small; in 2021 the population under 18 ranged from 0 to 3.5 percent across the quantitative metrics. We plan to reassess the feasibility and relevance of subgroup analyses by child and adult status in the Summative Evaluation Report.

**Cost Analysis.** Although the waiver goals do not encompass hypotheses about the directionality of per-beneficiary spending during the demonstration period, we plan to perform an exploratory analysis of the effects of the Demonstration on healthcare costs. Pending data quality and availability, NORC will include an analysis of the list of spending measures identified in the Evaluation Design in the Summative Evaluation Report, including:

- Total and PMPM spending for beneficiaries with an SUD
- Total federal cost
- Total and PMPM spending on SUD services for beneficiaries with an SUD
- Total and PMPM spending on non-SUD services for beneficiaries with an SUD
- Total and PMPM spending for beneficiaries with SUD who received services in an IMD
- Total and PMPM spending on SUD services for beneficiaries with an SUD who received services in an IMD
- Total and PMPM spending on non-SUD services for beneficiaries with an SUD who received services in an IMD

**Effects of COVID.** Although it is not within the scope of this report to evaluate the potential impact of the COVID-19 PHE on the number of providers and their capacity, the availability of services, and beneficiaries' care-seeking behaviors, we qualify our findings from review of the existing literature on the PHE's impact on the health care system.

**Qualitative data.** As noted above, our provider survey aimed to collect data from all certified Demonstration providers, but participation was voluntary. We conducted extensive follow-up by email and phone with all providers who did not complete the survey. Nonetheless, the survey findings may reflect selection bias on the part of providers who were motivated or had the capacity to participate in the survey. Although participating providers represented providers across the state who deliver all ASAM LOCs, the results may not include the experiences and viewpoints of all of the provider organizations in the Demonstration, especially those of smaller SUD/OUD providers that operate with limited administrative staff.

**Exhibit 4.** Summary of claims-based measures included in the Evaluation Design but excluded from this report

Minnesota Demonstration Goal	Hypothesis	Measure	Limitation and Reason for Exclusion from Report	Will the Measure be Included in Summative Evaluation Report?
<p><b>Goal 1.</b> Increased rates of identification, initiation, and engagement in treatment for SUD</p>	<p><i>The Demonstration will increase the share of beneficiaries who are identified and treated for OUD/SUD in ways that are consistent with evidence-based care.</i></p>	<p>Percentage of eligible providers offering screening services with SBIRT for SUD and/or OUD and/or referral to treatment</p>	<p><b>Data Quality:</b> Providers do not consistently bill for SBIRT</p>	<p>Yes</p>
<p><b>Goal 2.</b> Increased adherence to and retention in treatment</p>	<p><i>The Demonstration will improve adherence to treatment plans.</i></p>	<p>Percent of beneficiaries with SUD admitted to a residential or inpatient facility completing treatment</p>	<p><b>Data Availability:</b> Data is not available in DAANES due to COVID-19 PHE-related constraints</p>	<p>We will assess availability and quality of claims data</p>
<p><b>Goal 3.</b> Fewer readmissions to the same or higher LOCs where the readmission is preventable or medically inappropriate</p>	<p><i>The Demonstration will reduce readmissions to the same or higher LOC among beneficiaries with SUD.</i></p>	<p>Percentage of beneficiaries with an SUD diagnosis who were hospitalized for any diagnosis.</p>	<p><b>Overlap with Other Measures:</b> Report includes two alternative measures that overlap with this measure, percentage of beneficiaries with SUD admitted to the emergency department, and percentage readmitted after discharge for any diagnosis. These two indicators capture similar aspects of quality and care coordination</p>	<p>No</p>

Minnesota Demonstration Goal	Hypothesis	Measure	Limitation and Reason for Exclusion from Report	Will the Measure be Included in Summative Evaluation Report?
<p><b>Goal 6.</b> To allow patients to receive a wider array of evidence-based services that are focused on a holistic approach to treatment</p>	<p><i>The Demonstration will increase the share of beneficiaries who are treated for OUD/SUD in ways that are consistent with evidence-based care.</i></p>	<p>Percentage of beneficiaries with an SUD accessing support services following discharge from an inpatient facility or residential treatment center</p>	<p><b>Data Quality and Availability:</b> These measures were not included due to data availability and quality constraints in DAANES. The data does not represent all facilities and since reporting requirements change over time the denominator of providers is inconsistent. Finally, satisfaction or services measures are reported-out by clinicians and there is minimal variation in the responses, and therefore they are excluded out of concern for potential reporting bias.</p>	<p>No</p>
		<p>Use of peer supportive services among beneficiaries admitted to treatment</p>		<p>No</p>
		<p>Continuity of use peer-support services among beneficiaries admitted to treatment</p>		<p>No</p>
		<p>Percent of beneficiaries admitted for SUD treatment who were satisfied with services</p>		<p>No</p>

# Results

The results presented in this report are derived from Medicaid claims and enrollment data and presented by Demonstration goal. Data from interviews conducted during the MPA and a recent provider survey are also presented below to provide context for provider experience under the Demonstration.

## Goal 1: Increased rates of identification, initiation, and engagement in treatment for SUD

To ensure and increase access to critical LOCs for OUD and other SUDs, DHS implemented a variety of actions related to the goal of increasing the proportion of patients in SUD treatment. We hypothesized that these actions would increase the share of beneficiaries who are who are identified and treated for OUD/SUD in ways that are consistent with evidence-based care. For example, providers reported that the patient assessment process under the Demonstration was effective in directing patients to the appropriate level of treatment. In the MPA, providers reported having knowledge of and experience with the ASAM standards because they were closely aligned with the Minnesota matrix for determining placement. However, providers also noted that there were still challenges in applying ASAM criteria during assessment, as not all LOCs were available in the Demonstration. Both the MPA and the state's Quarterly Monitoring Reports noted that providers are performing SBIRT but may need more training on billing. The state provides billing information for providers in the MHCP Provider Manual, and providers can contact the MHCP Provider Resource Center with questions.

During 2021, the state also experienced billing issues concerning WM and has noted that the lack of enhanced rates for WM services in the Demonstration may prevent facilities from transitioning to WM services over detoxification, which can still be paid for through the state's Behavioral Health Fund. DHS indicated the onboarding of the ASAM Training Lead will support and expand training in early intervention, now in state law (0.5 Early Intervention) and the MHCP Provider Resource Center can provide ongoing training/guidance on all billing requirements.

### Summary of Claims-Based Measures

Between the three-year baseline and initial three-year Demonstration periods, the average for initiation of treatment within 14 days of diagnosis and engagement in treatment within 34 days of diagnosis increased, representing progress in the desired directionality (**Exhibit 5**). For the measure on beneficiary engagement in AOD dependence treatment, we do observe progress toward the state's target. All findings were statistically significant ( $p < 0.05$ ), though the magnitude of change was small.

**Exhibit 5.** Summary of claims-based measures for Goal 1

Measures Examined	State’s Target	Directionality	Progress (Yes/No)
Percentage of beneficiaries initiated into AOD dependence treatment	Increase	Increase	Yes
Proportion of beneficiaries with treatment initiated in <2 weeks (initiation of AOD treatment) <sup>18</sup>	Increase	Increase	Yes
Percentage of beneficiaries with engagement in AOD dependence treatment	Increase	Increase	Yes

Note: Progress in these metrics is determined by the absolute change in the regression-adjusted averages in the baseline period (2017-2019) and the initial Demonstration period (2020-2022).

### Initiation and engagement of alcohol and other drug dependence treatment

The overall number of beneficiaries with a new diagnosis of SUD increased from CY2017 (49,600) to CY2022 (53,644). Average rates of initiation of treatment within 14 days of diagnosis (**Exhibit 6**) remained relatively stable between the three-year baseline and three-year Demonstration periods. In regression-adjusted analyses, there was an absolute 0.1 percentage point increase between the average three-year baseline and average three-year Demonstration period. We also observed slight annual increases in treatment initiation from 2017 (37.5 percent) to 2020 (39.3 percent), followed by small declines in CY2021 (38.6 percent) and CY2022 (36.6 percent). Despite a delay in waiver implementation and the COVID-19 PHE, early data and our provider survey (See Exhibit 9) suggest that the roll out was associated with a more effective assessment process and that access to treatment was maintained. At the same time, however, there is also evidence that some persons with SUD/ODD may have struggled to overcome their individual PHE experiences with treatment.

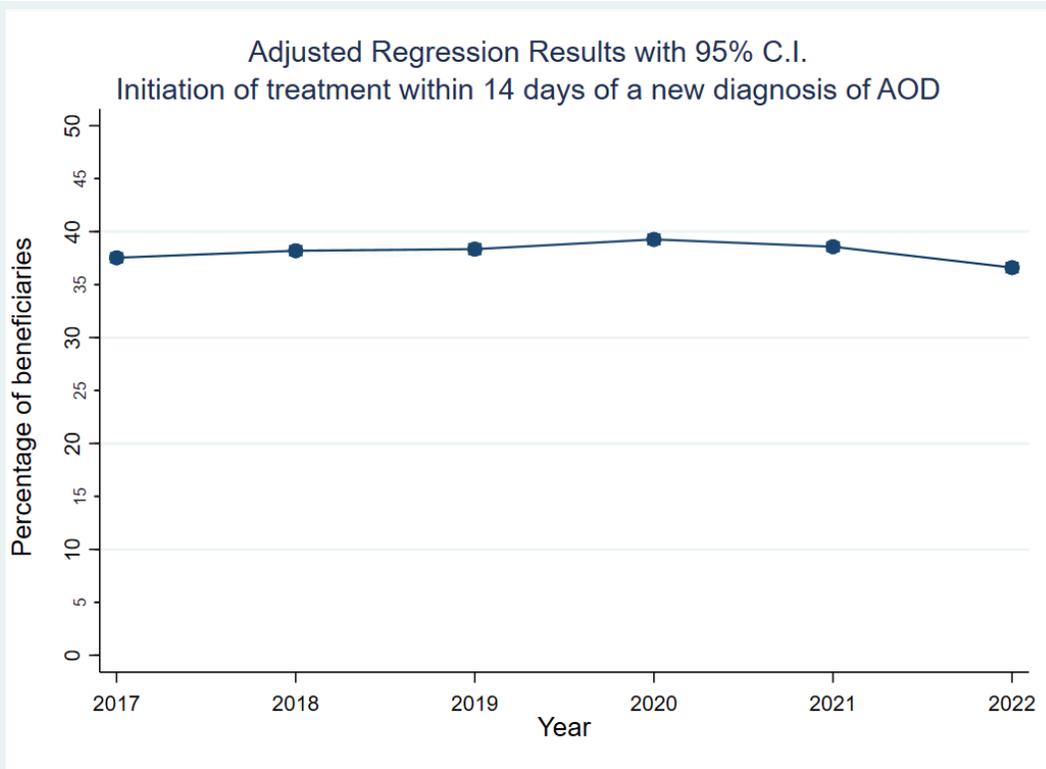
<sup>18</sup> While time to treatment measure (or proportion of beneficiaries with treatment initiated in less than 2 weeks) was originally associated with goal 2 in the evaluation design plan, it was moved to goal 1 for this report because the measure more directly impacts the goal to improve treatment initiation and engagement.

**Exhibit 6.** Proportion of beneficiaries with a new diagnosis of AOD who initiated treatment within 14 days, CY2017-CY2022

**Hypothesis:** The demonstration will increase the proportion of beneficiaries with a new diagnosis of AOD who initiate<sup>19</sup> treatment within 14 days of diagnosis.

**Measure:** Percentage of beneficiaries who initiate treatment in AOD dependence treatment

**Measure steward:** Medicaid Adult Core Set



Study Period	Number of Beneficiaries Who Initiated Treatment	Total Number of Beneficiaries with New Diagnosis of SUD	Proportion	Change from Prior Year
CY2017	18,618	49,600	37.5%	-
CY2018	18,419	48,218	38.2%	0.7%*
CY2019	17,649	46,019	38.4%	0.2%
CY2020	17,160	43,703	39.3%	0.9%*
CY2021	20,226	52,430	38.6%	-0.7%*
CY2022	19,636	53,644	36.6%	-2.0%*

<sup>19</sup> Treatment initiation is defined as ≥1 SUD-related treatment visit within 14 days of identification. Engagement is defined as receiving an additional two SUD-related treatment visits within 34 days after the initiation visit.

Overall Change from 2017-2019 to 2020-2022				
	2017-2019 (Average)	2020-2022 (Average)	Absolute Change	Relative Change
<b>Overall</b>	38.0%	38.1%	0.1	0.21%

\*Indicates significant difference at  $p < .05$  between time periods. This measure was assessed on beneficiaries with a diagnosis of AOD in the relevant year and with continuous eligibility and full coverage, following 1115 Substance Use Disorder Demonstrations: Technical Specifications for Monitoring Metrics, v. 5.

Note: Values are rounded to the first decimal, but absolute and relative change are calculated from values up to ten decimal points.

Timely treatment (defined as the proportion of beneficiaries who initiated medication within two weeks) remained fairly stable, with a slight increase of 0.21 percent in relative change between the three-year baseline and three-year initial Demonstration periods (**Exhibit 7**). The average time (days) to treatment remained the same during the three-year baseline and three-year Demonstration periods (2.3 days vs. 2.3 days).

**Exhibit 7.** Time to treatment for beneficiaries with an AOD use or dependence, CY2017-CY2022

Measure: Number of days between diagnosis and treatment reported as the average time to treatment, conditional on any treatment		
Study Period	Average Time to Treatment (Days)	Change from Prior Year (Days)
CY2017	2.31	-
CY2018	2.28	-0.03
CY2019	2.30	0.01
CY2020	2.15	-0.14*
CY2021	2.24	0.09*
CY2022	2.36	0.12*

Overall Change from 2017-2019 to 2020-2022				
Overall	2017-2019 (Average)	2020-2022 (Average)	Absolute Change	Relative Change
Proportion of beneficiaries with OUD and treatment within 2 weeks	38.0%	38.1%	0.1	0.24%
Average number of days	2.30	2.25	0.04*	-1.9%*

\*Indicates significant difference at  $p < .05$  between time periods.

Notes:

- Values are rounded to the first decimal, but absolute and relative change are calculated from values up to ten decimal points.
- This measure was assessed on beneficiaries with a diagnosis of OUD in the relevant year and with continuous eligibility and full coverage, following 1115 Substance Use Disorder Demonstrations: Technical Specifications for Monitoring Metrics, v. 5.

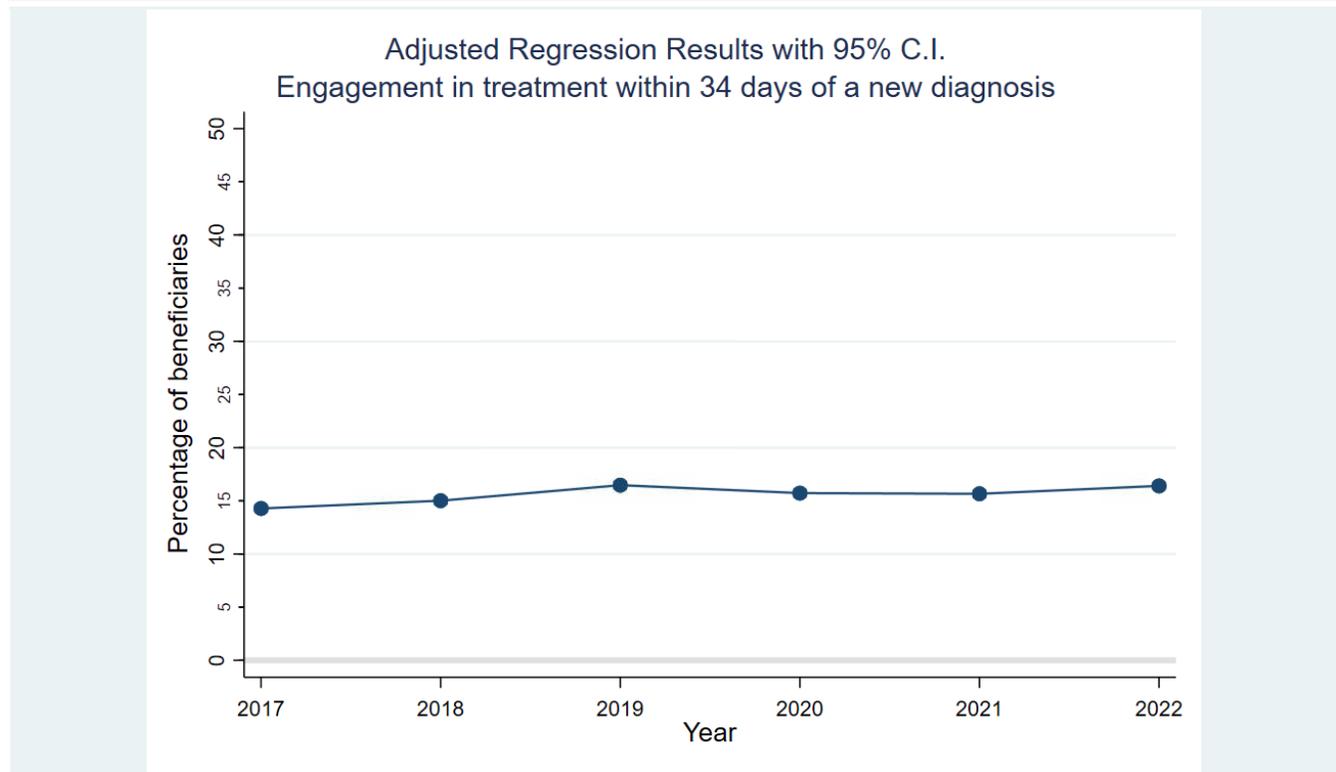
There was a relative increase of 4.3 percent in the average proportion of beneficiaries with a new SUD diagnosis who engaged in treatment within 34 days of diagnosis between the three-year baseline and three-year Demonstration periods (**Exhibit 8**). During the baseline period, timely treatment engagement increased by 2.2 percentage points between CY2017 (14.3 percent) and CY2019 (16.5 percent). Treatment engagement dipped slightly during Demonstration CY2020 (15.7 percent) and increased in Demonstration CY2022 (16.4 percent).

**Exhibit 8.** Proportion of beneficiaries with a new diagnosis of SUD who engaged in treatment within 34 days, CY2017-CY2022

**Hypothesis:** The Demonstration will increase the proportion of beneficiaries with a new SUD diagnosis who engage in treatment within 34 days of diagnosis.

**Measure:** Percentage of beneficiaries with engagement in AOD dependence treatment

**Measure steward:** Medicaid Adult Core Set



Study Period	Number of Beneficiaries Who Engaged in Treatment	Total Number of Beneficiaries with New Diagnosis of SUD	Rate	Change from Prior Year
CY2017	7,085	49,600	14.3%	-
CY2018	7,239	48,218	15.0%	0.7%*
CY2019	8,974	54,477	16.5%	1.5%*

Study Period	Number of Beneficiaries Who Engaged in Treatment	Total Number of Beneficiaries with New Diagnosis of SUD	Rate	Change from Prior Year
CY2020	6,873	43,703	15.7%	-0.7%*
CY2021	8,213	52,430	15.7%	-0.1%
CY2022	9,419	57,420	16.4%	0.7%*

**Overall Change from 2017-2019 to 2020-2022**

Overall	2017-2019 (Average)	2020-2022 (Average)	Absolute Change	Relative Change
Impact	15.3%	16.0%	0.7*	4.3%*

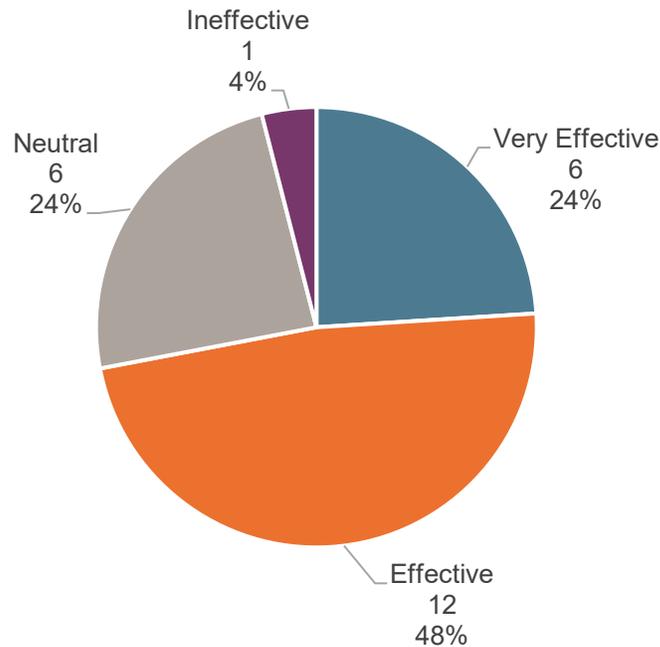
\*Indicates significant difference at  $p < .05$  between time periods. This measure was assessed on beneficiaries with a diagnosis of OUD in the relevant year and with continuous eligibility and full coverage, following 1115 Substance Use Disorder Demonstrations: Technical Specifications for Monitoring Metrics, v. 5.

Note: Values are rounded to the first decimal, but absolute and relative change are calculated from values up to ten decimal points.

### Provider Experience with Patient Assessment Process

Providers reported on the survey that the Demonstration is effective in assessing patients and then directing them to the appropriate LOC. When asked how effective the patient assessment process was, 20 out of 25 providers said it was “Very effective” or “Effective” (**Exhibit 9**). Moreover, one provider noted that although patients seeking residential services are not often looking for a referral to an outpatient LOC, they are able to transition patients through their referral network when appropriate. The Demonstration’s effectiveness in directing patients to the appropriate LOC and type of treatment will also be discussed below as part of Goals 3 and 6.

**Exhibit 9.** Provider rating of Year 2 MN 1115(a) SUD Demonstration effectiveness



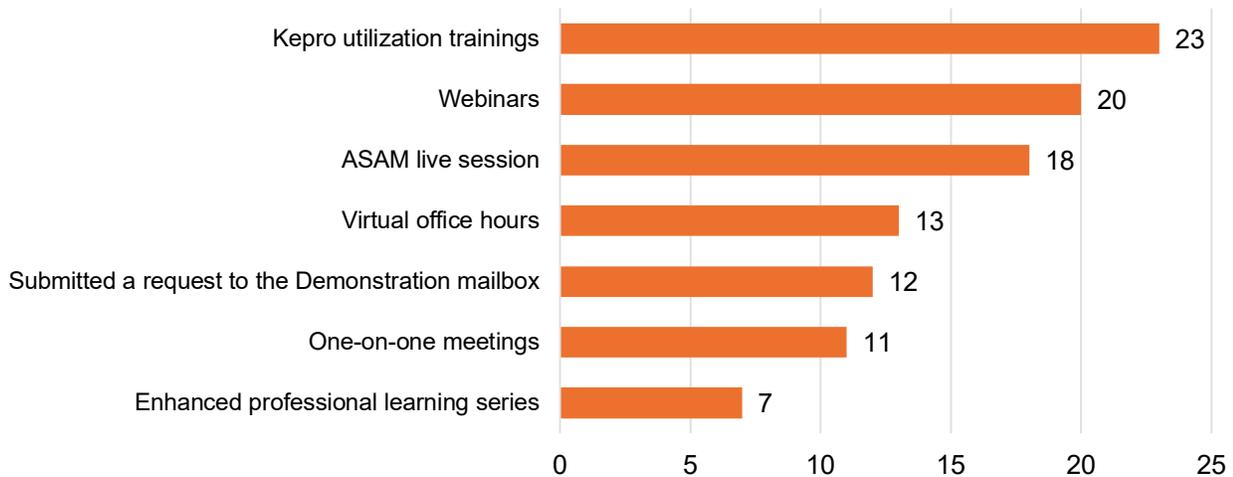
### Provider Training and Technical Assistance

DHS trainings and ongoing technical assistance prepared certified providers to implement system reforms designed to increase rates of identification, initiation, and engagement in treatment for SUD. Providers responding to the survey reported high levels of participation in the state’s training and TA sessions. The current findings, presented in **Exhibit 10**, are consistent with the 2021 provider focus group results detailed in the MPA. All except one respondent had attended a Kepro UM training, and almost all had attended a state webinar on the Demonstration and/or an ASAM live session. In addition, eight providers (33 percent) commented that they had no additional training needs at this time. For example, one stated, “I believe that we have had enough support as we have transitioned through the process.” Another noted that the state’s training and TA have improved, “I think that DHS has done a much better job of providing assistance/support to providers entering into the 1115.” One provider commented that they would like to see the state offer another enhanced professional learning series, which was a more in-depth training offered during the first year of the Demonstration. Minnesota is aware of these training needs, and in the last quarter of 2022 Minnesota contracted with the University of Nevada for additional enhanced professional learning series and completed the training of the first cohort of providers to be ASAM trainers who can enhance the use of ASAM throughout the state, using a peer support model.<sup>20</sup> Fewer providers reported that they have taken advantage of the TA offerings, with approximately half of respondents attending virtual office hours or submitting a request through

<sup>20</sup> Minnesota Substance Use Disorder System Reform Medicaid Section 1115 SUD Demonstrations Monitoring Report – Part B Version 4.0, Demonstration Year 4, Quarter 2.

email. Despite more limited participation, the state views this as an important strategy for ongoing engagement with certified providers.

**Exhibit 10.** Enrolled provider participation in training and TA by type



However, other providers reported that the training and TA do not meet their needs, echoing the conclusion from the MPA that some providers did not find all the original trainings clear or tailored to their needs. Similarly, the state was aware of the need to ensure that training was available with mandatory provider participation. Some providers reported that the ASAM training was too focused on clinical documentation and was too much of a time commitment. They suggested that the state provide trainings for more staff members or different levels of staff, such as the licensed alcohol and drug counselors (LADCs). For Kepro UM training, one provider suggested that DHS develop additional resources: “I believe having some ‘cheat sheets,’ if you will, would be helpful. For example, I have helped numerous other treatment centers write down a step-by-step sheet on how to submit paperwork into Kepro.” Another provider identified WM training as a need for certified providers: “Opportunity exists for WM providers to increase care and collaboration with additional staff and training; this includes additional trainings for best practices with MOUD for all levels of care, including referrals, appropriate placement, and eligibility/coverage from MCOs for MOUD patients.... Would like to see a CE [continuing education] event to increase awareness and effectiveness in the field.”

## Goal 2: Increased adherence to and retention in treatment

This second goal reflects the overall outcome of systemic changes under the Demonstration, including actions by DHS to encourage improved care coordination and transitions between LOCs, access to critical LOCs for SUD, use of evidence-based placement criteria and program standards, and sufficient provider capacity at each LOC. We hypothesized these efforts would improve adherence to treatment plans. To evaluate progress toward this goal quantitatively, we analyzed data to assess several measures, including follow-up after IMD stays or ED visits for AOD use or dependence, discharge from

an IMD with a follow-up visit within 7 and 30 days of discharge, percent of OUD patients' initiative with MOUD, and continuity of pharmacotherapy. Data from a recent provider survey are also presented below to provide context for provider experience under the Demonstration.

Additionally, an ongoing effort of the state is to continue support of and the expanded functionality and use of the Minnesota Prescription Monitoring Program (PMP),<sup>21</sup> with the goal of supporting expanded access to MOUD. At the time of the Interim Evaluation Report, plans to further develop the system had been suspended, but descriptive data on utilization indicated that there had been an increase in utilization during the first year of the Demonstration.

### Summary of Claims-Based Measures

Of three claims-based measures associated with Goal 2 (**Exhibit 11**), we do not observe progress toward the state's targets for one measure (continuity of pharmacotherapy for OUD). This may be partially due to significant disruptions in utilization patterns due to the PHE. Progress toward the state's targets was observed for the other two measures; there was an increase in follow-up after IMD stay for beneficiaries with AOD use or dependence diagnosis, as well as an increase in the percentage of OUD patients who initiated MOUD.

**Exhibit 11.** Summary of claims-based measures for Goal 2

Measures Examined	State's Target	Directionality	Progress (Yes/No)
Follow-up after IMD stay, for persons with AOD use or dependence diagnosis	Increase	Increase	Yes
Continuity of pharmacotherapy for OUD	Increase	Decrease	No
Percentage of OUD patients prescribed medication for OUD (MOUD) <sup>22</sup>	Increase	Increase	Yes

Note: Progress in these metrics is determined by the absolute change in the regression-adjusted averages in the baseline period (2017-2019) and the initial Demonstration period (2020-2022).

### Follow-up after IMD stay

There was an increase in 30-day follow-up contacts for beneficiaries with alcohol or other SUDs and an IMD stay (**Exhibit 12**) during the three-year Demonstration period, continuing a trend observed in the

<sup>21</sup> More information on the PMP is available here: <https://mn.gov/boards/pharmacy-pmp/>

<sup>22</sup> While the percentage of OUD patients prescribed MOUD measure was originally associated with goal 6 in the evaluation design plan, it was moved to goal 2 for this report because the measure more directly impacts increased adherence to and retention in treatment.

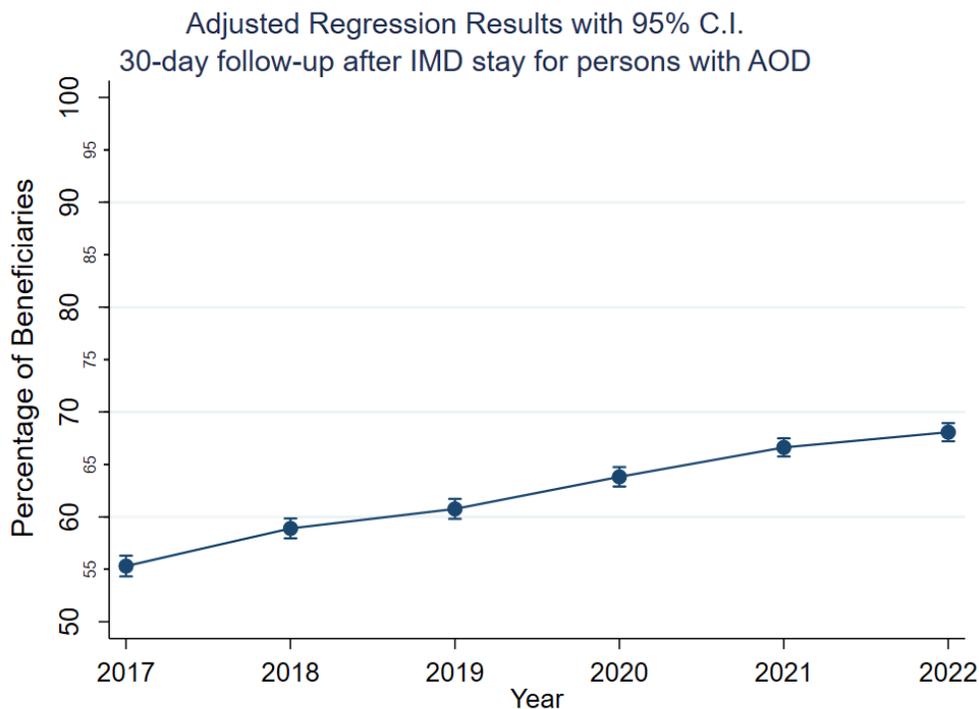
baseline period. Since CY2017, more than half of IMD stays had a follow-up visit within 30 days. The proportion of IMD stays with a follow-up visit within 30 days has increased year over year from 55.3 percent in CY2017 to 68.1 percent in CY2022.

**Exhibit 12.** Follow-up contacts for beneficiaries with alcohol or other SUD and an IMD stay, CY2017-CY2022

**Hypothesis:** DHS will increase 30-day follow-up contacts for beneficiaries with alcohol or other SUD and an IMD stay.

**Measure:** 30-day follow-up contact after IMD stay for persons with AOD use or dependence

**Measure steward:** HEDIS measure/NCQA. This is a modification of metric 17(1), modified to the subpopulation of patients with an AOD use disorder or and IMD discharge rather than ED.



Study Period	Total Follow-up Contacts in 30 Days	Total IMD Stays	Percent of Stays with Follow-up Visit within 30 Days	Absolute Change from Prior Year	Number of Beneficiaries with Alcohol or Other SUD and Discharged from an IMD	Percent of Beneficiaries with Follow-up Visit within 30 Days	Absolute Change from Prior Year
CY2017	6,379	11,825	53.9%	-	10,691	55.3%	-
CY2018	7,075	12,326	57.4%	3.5*	11,052	58.9%	3.6*

Study Period	Total Follow-up Contacts in 30 Days	Total IMD Stays	Percent of Stays with Follow-up Visit within 30 Days	Absolute Change from Prior Year	Number of Beneficiaries with Alcohol or Other SUD and Discharged from an IMD	Percent of Beneficiaries with Follow-up Visit within 30 Days	Absolute Change from Prior Year
CY2019	7,204	12,321	58.5%	1.1	11,030	60.8%	1.9*
CY2020	8,098	13,111	61.8%	3.3*	11,025	63.8%	3.1*
CY2021	10,328	15,892	65.0%	3.2*	12,189	66.6%	2.8*
CY2022	11,631	17,335	67.1%	2.1*	12760	68.1%	1.5*

**Overall Change from 2017-2019 to 2020-2022**

	2017-2019 (Average)	2020-2022 (Average)	Absolute Change	Relative Change
Rate (percent of stays with a follow-up visit within 30 days)	56.7%	64.9%	8.1*	14.3%*
Percent of beneficiaries with a follow-up visit within 30 days	58.4%	66.3%	7.8*	13.4%*

\*Indicates significant difference at p<.05 between time periods. Only follow-up per 30-day period is counted.

Notes:

- Values are rounded to the first decimal, but absolute and relative change are calculated from values up to ten decimal points.
- Transfers between IMDs that occur within 1 day can be counted as 1 stay. This is a modification of metric 17(1), modified to the subpopulation of patients with an AOD use disorder or an IMD discharge rather than ED.

### Continuity of pharmacotherapy for opioid use disorder

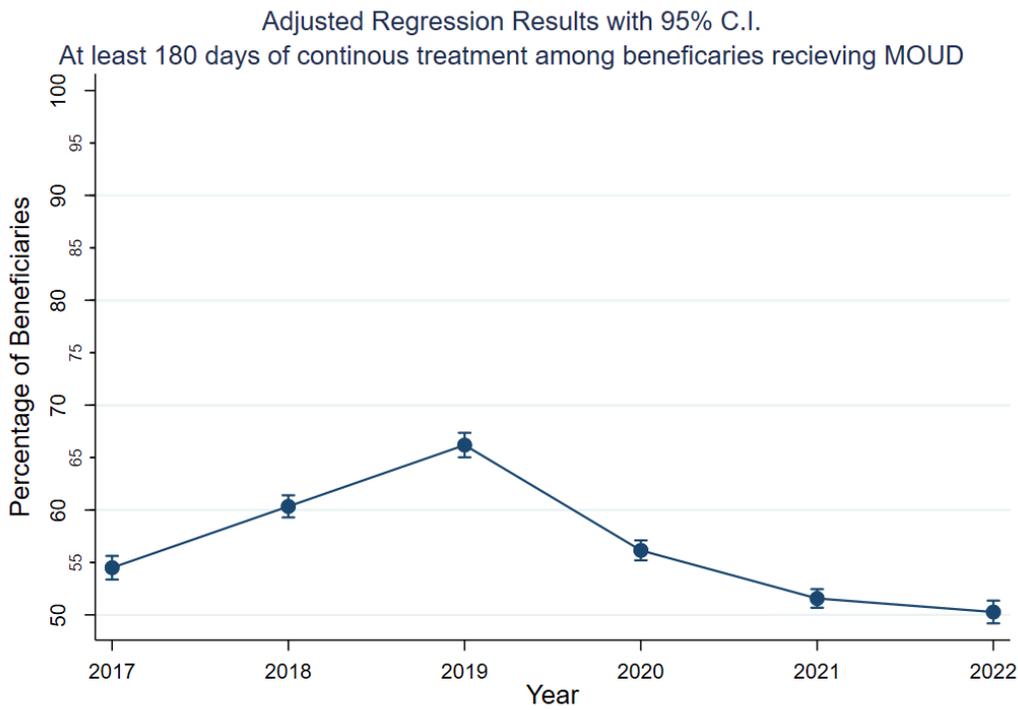
Between the baseline and Demonstration periods, there was an overall decrease in the proportion of beneficiaries receiving pharmacotherapy continuously for OUD for at least 180 days (**Exhibit 13**). During the three-year baseline period, there was an increase between CY2017 (54.5 percent) and CY2019 (66.2 percent); however, we observe a sharp decrease beginning in CY2020. As of CY2022, the proportion of beneficiaries receiving continuous pharmacotherapy for at least 180 days was 50.3 percent.

**Exhibit 13.** Proportion of beneficiaries receiving pharmacotherapy for OUD for ≥180 days of continuous treatment, CY2017-CY2022

**Hypothesis:** The demonstration will improve continuity of pharmacotherapy for opioid use disorder.

**Measure:** Continuity of pharmacotherapy for OUD

**Measure steward:** National Quality Forum



Study Period	Number of Beneficiaries Receiving Pharmacotherapy for OUD Who Have ≥180 Days of Continuous Treatment	Total Number of Beneficiaries Receiving MOUD	Proportion	Change from Prior Year
CY2017	4,374	8,026	54.5%	-
CY2018	5,385	8,924	60.3%	5.8%*
CY2019	5,390	8,143	66.2%	5.8%*
CY2020	6,113	10,885	56.2%	-10.0%*
CY2021	6,539	12,678	51.6%	-4.6%*
CY2022	5,578	11,094	50.3%	-1.3%

Overall Change from 2017-2019 to 2020-2022				
	2017-2019 (Average)	2020-2022 (Average)	Absolute Change	Relative Change
<b>Overall</b>	60.4%	52.6%	-7.8*	-12.9%*

## Percentage of OUD patients prescribed MOUD

**Exhibit 14** summarizes the results for the proportion of beneficiaries with an OUD who were prescribed MOUD. In annual regression-adjusted trend analyses, the proportion of beneficiaries prescribed medication increased from 42.6 percent in CY2017 to 52.9 percent in CY2022. The largest increase, from 45.6 percent to 52.5 percent, was observed between CY2018 and CY2019.<sup>23</sup> Taken together these measures regarding treatment of SUD/OUD with medication, access and prescribing, describe the challenges that patients faced during the COVID-19 PHE when health care and prescription supplies were disrupted, but telehealth was expanded. By 2022, the data indicates that MN providers were focused on treatment with MOUD, an explicit goal of the Demonstration.

### **Exhibit 14.** Proportion of beneficiaries with OUD prescribed MOUD, CY2017-CY2022

**Hypothesis:** The demonstration will increase the proportion of beneficiaries with an OUD prescribed MOUD.

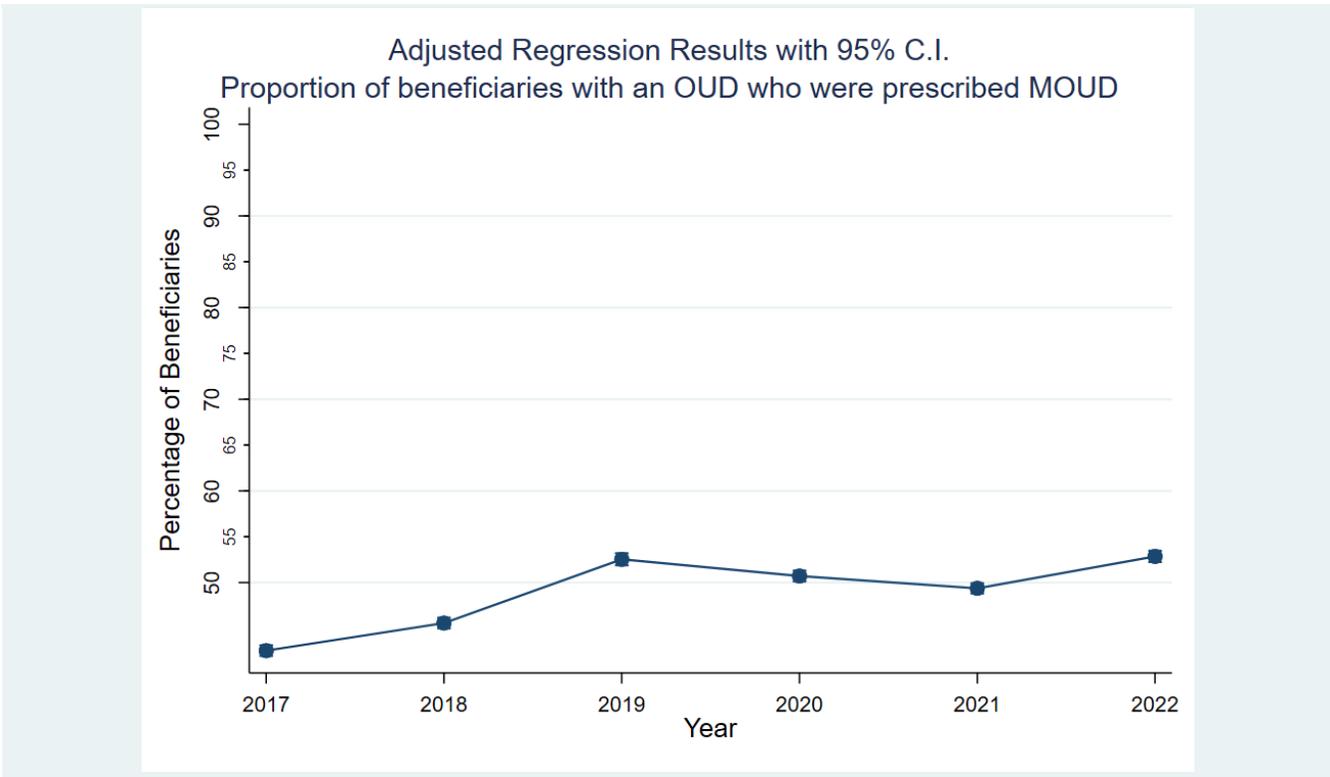
**Measure:** Percentage of OUD patients prescribed MAT or MOUD

**Measure steward:** DHS constructed, following Healthcare Effectiveness Data and Information Set (HEDIS) value set for medication treatment for opioid misuse or dependence medications (which include buprenorphine, naltrexone, and methadone)

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<sup>23</sup> NORC used claims data to assess the unique prescribers of MOUD in the baseline PCA. The Summative Evaluation Report will include a reexamination of unique prescribers of MOUD, updating the baseline PCA. We anticipate an increase in the number of providers who are actively prescribing MOUD due to state-wide initiatives to expand eligibility for prescribing as well as to the national removal of the requirement for a Drug Enforcement Administration (DEA) “X-waiver” to prescribe buprenorphine.

**Hypothesis: The demonstration will increase the proportion of beneficiaries with an OUD prescribed MOUD.**



Study Period	Number of Beneficiaries with an OUD Who Were Prescribed MOUD	Total Number of Beneficiaries with an OUD	Proportion	Change from Prior Year
CY2017	11,535	27,094	42.6%	-
CY2018	12,367	27,128	45.6%	3.0%*
CY2019	14,094	26,825	52.5%	7.0%*
CY2020	13,250	26,125	50.7%	-1.8%*
CY2021	14,440	29,244	49.4%	-1.3%*
CY2022	16,619	31,441	52.9%	3.5%*

Overall Change from 2017-2019 to 2020-2022				
	2017-2019 (Average)	2020-2022 (Average)	Absolute Change <sup>24</sup>	Relative Change <sup>25</sup>
<b>Overall</b>	47.0%	51.0%	4.0*	8.6%*

\*Indicates significant difference at p<.05 between time periods.

Note: Values are rounded to the first decimal, but absolute and relative change are calculated from values up to ten decimal points.

As shown in **Exhibit 15**, there was an increase in the proportion of beneficiaries in both rural and urban areas who were prescribed MOUD; the rural and urban area trends appear to be similar.

**Exhibit 15.** Proportion of beneficiaries with OUD prescribed MOUD by urban/rural status, CY2017-CY2022

Study Period	Number of Beneficiaries with an OUD Who Were Prescribed MOUD		Total Number of Beneficiaries with an OUD		Percent		Absolute Difference in Each Year
	Urban	Rural	Urban	Rural	Urban	Rural	Urban vs. rural
CY2017	8,945	2,954	19,470	7,624	45.9%	38.7%	7.2
CY2018	9,675	3,069	19,765	7,363	49.0%	41.7%	7.3
CY2019	10,513	3,354	19,593	7,232	53.7%	46.4%	7.3
CY2020	10,233	3,078	19,369	6,756	52.8%	45.6%	7.3
CY2021	11,202	3,306	21,762	7,482	51.5%	44.2%	7.3
CY2022	12,404	3,592	23,533	7,908	52.7%	45.4%	7.3

Note: Data from the Federal Office of Rural Health Policy (FORHP) was used to code ZIP Codes to urban and rural areas.

Overall Change from 2017-2019 to 2020-2022				
Overall	2017-2019 (Average)	2020-2022 (Average)	Absolute Change	Relative Change
Urban areas	48.8%	52.8%	4.0	8.1%
Rural areas	42.0%	46.0%	4.0	9.5%

Notes:

- Data from the Federal Office of Rural Health Policy (FORHP) was used to code ZIP Codes to urban and rural areas.
- Values are rounded to the first decimal, but absolute and relative change are calculated from values up to ten decimal points.

<sup>24</sup> Calculated as the baseline period value subtracted from the Demonstration period value.

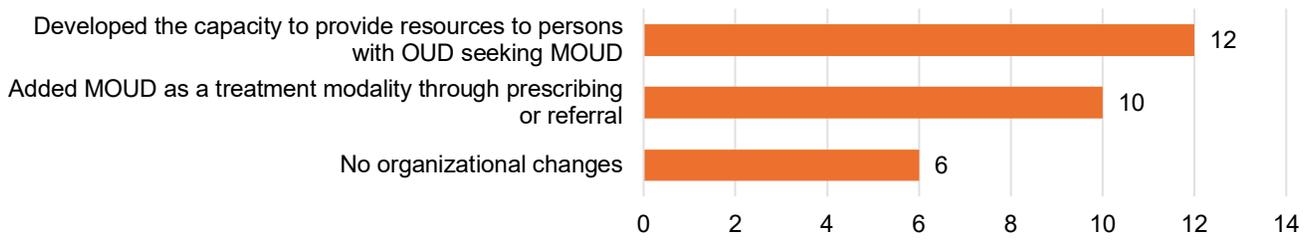
<sup>25</sup> Calculated as Demonstration period value minus baseline period value, divided by baseline period value.

## Provider-Reported Changes in Treatment and Service Capacity

There is also qualitative evidence that the Demonstration’s reforms are resulting in an increase in the proportion of patients in OUD and SUD treatment and adherence to and retention in treatment.

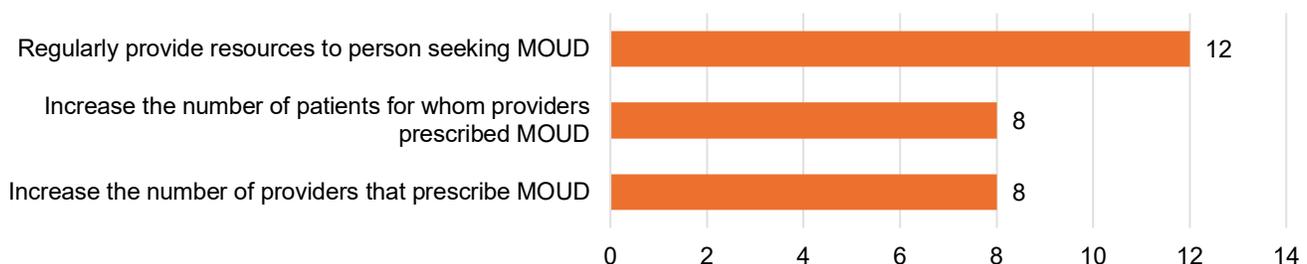
In the recent provider survey, 62 percent (n = 15) of survey respondents reported that they did not have to change the delivery of treatment services for the Demonstration, whereas the remaining 38 percent (n = 10) reported making changes (**Exhibit 16**). Importantly, providers that made changes highlighted client uptake because of the ability to serve a new service population, increased access to buprenorphine plus naloxone (Suboxone®) and WM providers, and the ability to prescribe MOUD directly from their providers and partnerships. One provider shared, “This was not a population we served before the waiver implementation. Our experience has been very positive.”

**Exhibit 16.** MOUD treatment changes reported by providers since Demonstration implementation



According to the survey, 28 percent (seven) of providers have increased the number of patients receiving MOUD prescriptions, a specific goal of the Demonstration. Twenty-four and 20 organizations reported offering MOUD referral and MOUD treatment, respectively (**Exhibit 17**). Among the 24 MOUD-referring organizations, two-thirds provided referrals to fewer than 100 patients. Among the 20 respondents that provided MOUD, two organizations served more than 250 individuals, and 75 percent prescribed MOUD to fewer than 100 patients. Three organizations reported that they do not prescribe MOUD, whereas only one organization reported providing MOUD only through prescription. Some survey respondents described challenges with providing MOUD treatment or referral to clients, including lack of client interest, limited MOUD-prescribing providers, inadequate mental health services to complement medication use, and insufficient organizational capacity (**Exhibit 18**).

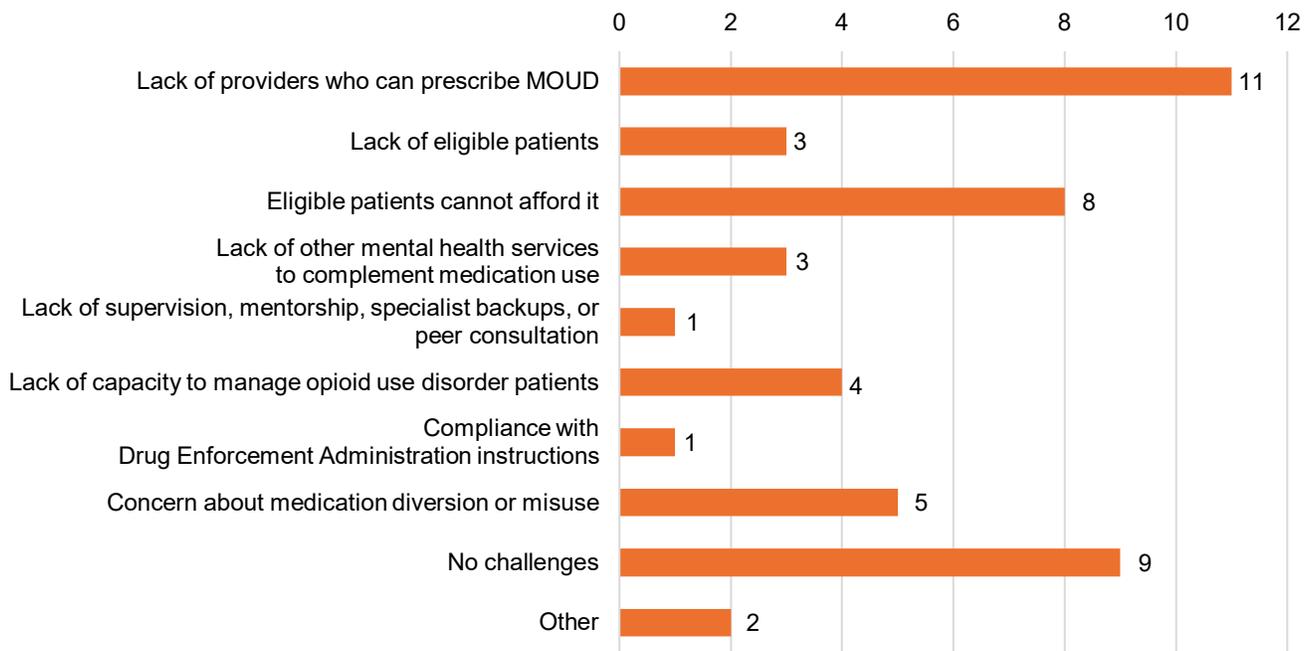
**Exhibit 17.** Changes in service capacity reported by providers since Demonstration implementation



## Provider Challenges in Providing MOUD to Patients under Demonstration

Under the Demonstration, pharmacies and prescribers who dispense from their offices submit prescription data to the PMP for all Schedule II, III, IV controlled substances; butalbital; and gabapentin dispensed in or into Minnesota. Approximately 85 percent of respondents reported that provider use of the PMP stayed the same since Demonstration implementation, whereas 15 percent reported increases in PMP use.

**Exhibit 18.** Self-reported provider challenges in providing MOUD to Demonstration patients\*



\*Providers could select  $\geq 1$  response for this question, so the total does not add up to 25.

DHS has taken steps to further align state regulations with the Demonstration and to expand provider participation. At the same time, Minnesota continues to develop and implement training and TA as more providers are certified in the Demonstration.

## Use of Evidence-Based SUD-Specific Placement Criteria

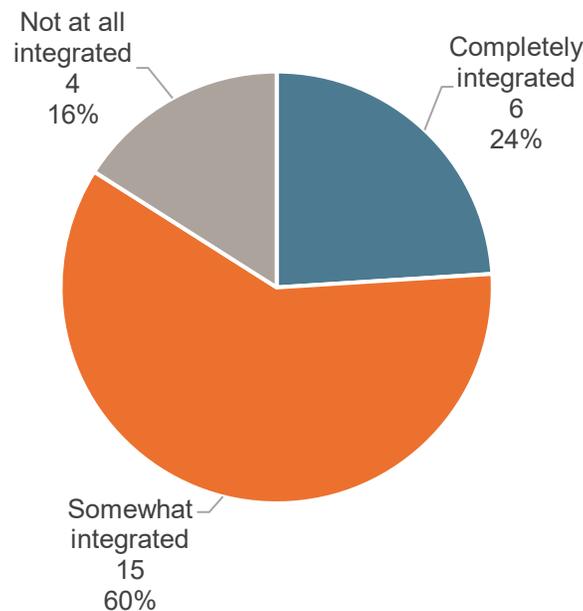
To facilitate the use of evidence-based, SUD-specific placement criteria and meet the goals under Milestone 2, DHS has been primarily focused on the implementation of a new process and system for UM through the Kepro UM program that monitors and guides the application of ASAM standards when determining the appropriate LOC. The goals under this milestone include increased adherence to and retention in treatment, as well as fewer readmissions to the same or higher LOCs where the readmission is preventable or medically inappropriate and reduced number of opioid-related overdoses and deaths in the state. This is a significant ongoing operational change under the Demonstration. Data

from a recent provider survey are presented below to provide context for provider experience concerning the Kepro UM program.

At the time of the MPA, DHS had recently contracted with Kepro, implemented the process for UM, and begun training the certified providers on data collection and reporting. As noted above, training on UM as well as on the ASAM standards is ongoing for newly certified providers.

Since the initial reporting of the challenges providers faced in fulfilling the documentation and reporting requirements for the UM program, DHS has changed the Kepro UM requirements to cover only 10 percent of residential cases and 15 percent of outpatient cases.<sup>26</sup> On the survey, 84 percent of providers reported that the Kepro UM was either fully or somewhat integrated into their workflow processes (**Exhibit 19**). They continued to underscore that Kepro UM is time-consuming and has high administrative costs. In addition, some providers reported poor communication regarding changes concerning regulations and their interpretation for utilization review. In addition, Kepro requests the same information as insurers, requiring that the data be entered twice. One provider noted, “It has created more work, therefore more staff, in a very challenging hiring environment.” Nonetheless, approximately 42 percent of surveyed providers found the UM requirement changes to be helpful, and fewer providers, 33 percent, reported that they were either not very helpful or not at all helpful.

**Exhibit 19.** Integration of Kepro UM into certified provider workflow



One Demonstration provider commented, “KEPRO is not streamlined or seen as a helpful resource— inconsistency with regulations and interpretations, things changing without communication.”

<sup>26</sup> Minnesota Contract #188256 with Keystone Peer Review Organization, LLC, for Utilization Management

## Goal 3: Fewer readmissions to the same or higher level of care (LOC) where the readmission is preventable or medically inappropriate

The state hypothesized that the Demonstration would reduce readmissions to the same or higher LOC among beneficiaries with SUD. To evaluate progress toward this goal quantitatively, we analyzed data to assess all-cause acute care readmissions (defined as the percentage of acute inpatient stays during the measurement year that were followed by an unplanned acute readmission for any diagnosis within 30 days).

### Summary of Claims-Based Measures

For the measure associated with Goal 3 (**Exhibit 20**), we do not observe progress toward the state’s targets.

**Exhibit 20.** Summary of claims-based measures for Goal 3

Measures Examined	State’s Target	Directionality	Progress (Yes/No)
All-cause readmissions during the measurement period among beneficiaries with SUD	Decrease	Increase	No

Note: Progress in these metrics is determined by the absolute change in the regression-adjusted averages in the baseline period (2017-2019) and the initial Demonstration period (2020-2022).

### All-cause readmissions within 30 days of discharge among beneficiaries with an SUD

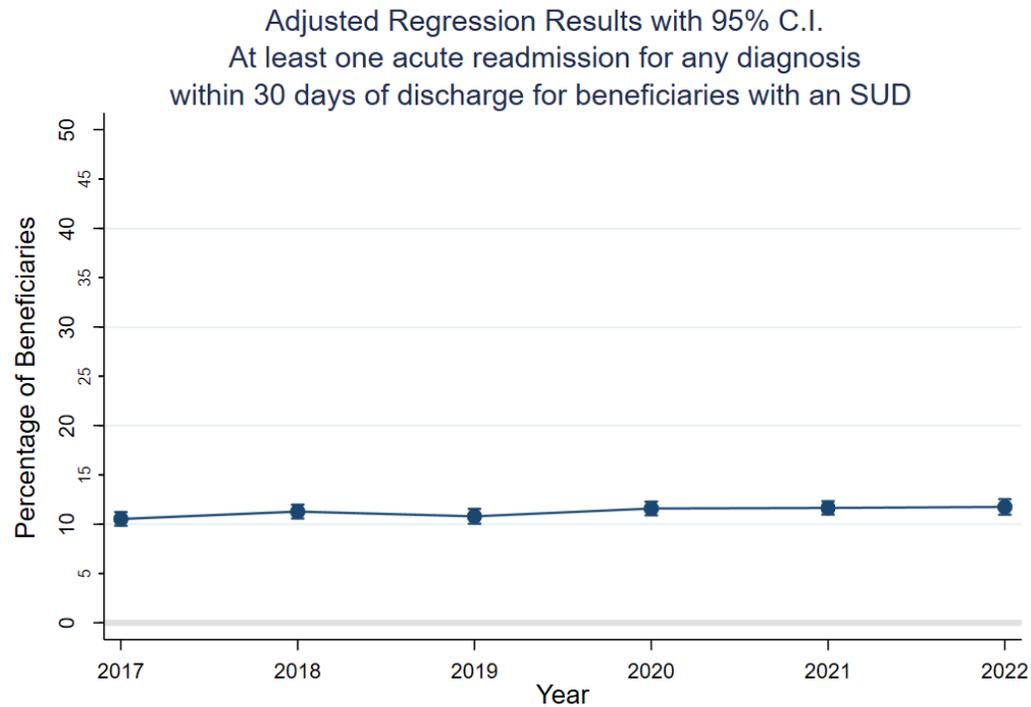
The state made several efforts to improve care coordination and transitions between levels of care, such as linking beneficiaries with OUD and SUD to community-based services and support. Despite these efforts, the Demonstration observed an increase in readmissions among beneficiaries with an SUD (**Exhibit 21**). The average readmission rate increased from 11.8 percent during the three-year baseline period to 12.7 percent during the three-year Demonstration period. CY2017 had the lowest rate of readmissions, whereas CY2022 had the highest. The proportion of beneficiaries with any readmission increased by 0.8 percentage points from the baseline period to the Demonstration period. The rate of readmission for beneficiaries with more than one stay also increased from 19.5 percent to 20.4 percent.

**Exhibit 21.** All-cause readmissions among beneficiaries with an SUD, CY2017-CY2022

**Hypothesis:** The demonstration will decrease readmissions.

**Measure:** All-cause readmissions during the measurement period among beneficiaries with SUD:  $\geq 1$  acute readmission for any diagnosis within 30 days of the index discharge date for beneficiaries with an SUD

**Measure steward:** HEDIS measure/NCQA. This is a modification of CMS Metric 25, based on the calendar year.



Study Period	Total Hospital Stays	Total Readmissions	Percent Index Stays with a Readmission	Absolute Change from Prior Year	Number of Beneficiaries with Index Event	Percent of Beneficiaries with Any Readmission	Absolute Change from Prior Year	Number of Beneficiaries with >1 Stay	Average Percent of Stays with Readmissions for Beneficiaries with >1 Stay	Absolute Change from Prior Year	Average Number of Readmissions for Those with >1 Stay
CY2017	11,119	1,238	11.1%	-	7,998	10.5%	-	842	19.4%	-	0.61
CY2018	12,146	1,518	12.5%	1.4*	8,481	11.3%	0.7	956	19.7%	0.3%	0.69
CY2019	11,994	1,392	11.6%	-0.9	8,499	10.8%	-0.5	918	19.3%	-0.4%	0.65
CY2020	11,914	1,446	12.1%	0.5	8,338	11.6%	0.8	966	20.3%	1.1%	0.68

Study Period	Total Hospital Stays	Total Readmissions	Percent Index Stays with a Readmission	Absolute Change from Prior Year	Number of Beneficiaries with Index Event	Percent of Beneficiaries with Any Readmission	Absolute Change from Prior Year	Number of Beneficiaries with >1 Stay	Average Percent of Stays with Readmissions for Beneficiaries with >1 Stay	Absolute Change from Prior Year	Average Number of Readmissions for Those with >1 Stay
CY2021	13,256	1,703	12.8%	0.7	9,117	11.6%	0.1	1,062	20.4%	0.0%	0.70
CY2022	11,631	1,535	13.2%	0.3	8,002	11.7%	0.1	940	20.5%	0.2%	0.73

Overall Change from 2017-2019 to 2020-2022				
	2017-2019 (Average)	2020-2022 (Average)	Absolute Change	Relative Change
Readmission rate (percent of index stays with a readmission)	11.8%	12.7%	0.96*	8.1%*
Proportion of beneficiaries with any readmission	10.9%	11.7%	0.8*	7.2%*
Rate of readmission for beneficiaries with ≥1 stay	19.5%	20.4%	0.95*	4.9%*

\*At p<.05

Notes:

- Includes inpatient hospital stay
- Values are rounded to the first decimal, but absolute and relative change are calculated from values up to ten decimal points.

## Goal 4: Improved access to care for physical health conditions among Medicaid beneficiaries

The state hypothesized that the Demonstration would increase use of preventive health services among Medicaid beneficiaries. To evaluate progress towards this goal quantitatively, we analyzed data to assess the percentage of beneficiaries with an SUD who received ambulatory or preventative care.

### Summary of Claims-Based Measures

For the one measure associated with Goal 4, we do not observe progress toward the state’s targets. This may be partially due to significant disruptions in utilization patterns due to the PHE.

**Exhibit 22.** Summary of claims-based measures for Goal 4

Measures Examined	State’s Target	Directionality	Progress (Yes/No)
Percentage of beneficiaries with an SUD receiving ambulatory or preventative care	Decrease	Increase	No

Note: Progress in these metrics is determined by the absolute change in the regression-adjusted averages in the baseline period (2017-2019) and the initial Demonstration period (2020-2022).

### Percentage of beneficiaries with an SUD receiving ambulatory or preventive care

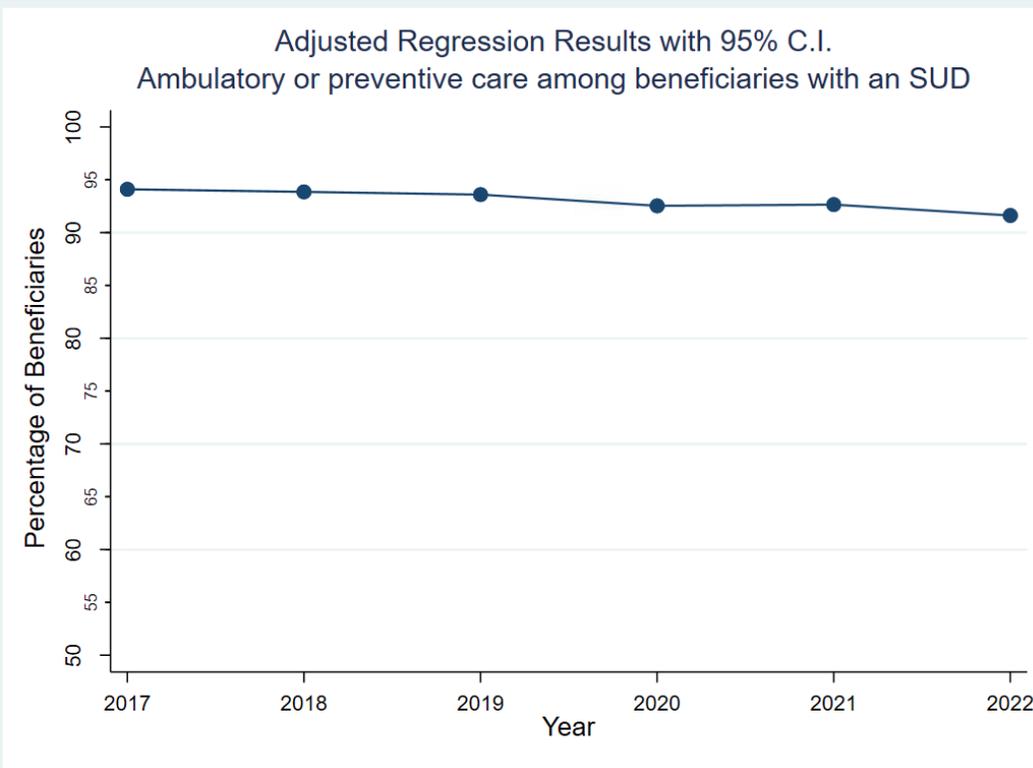
There was a small overall decrease in the proportion of beneficiaries with an SUD receiving ambulatory or preventive care between the three-year baseline and three-year Demonstration periods, from 94.5 percent to 92.8 percent, representing a 1.7 percentage point change (**Exhibit 23**). There was an increase in the number of beneficiaries with an SUD who had an ambulatory preventive care visit.

**Exhibit 23.** Proportion of beneficiaries with an SUD who had an ambulatory visit for prevention services, CY2017-CY2022

**Hypothesis:** The demonstration will improve access to preventive services for beneficiaries with an SUD.

**Measure:** Percentage of beneficiaries with an SUD receiving ambulatory or preventive care

**Measure steward:** HEDIS measure/National Committee for Quality Assurance (NCQA)



Study Period	Number of Beneficiaries with SUD Who Had Ambulatory Preventive Care Visit	Number of Beneficiaries with SUD	Proportion	Change from Prior Year
CY2017	61,836	65,334	94.6%	-
CY2018	62,760	66,472	94.4%	-0.2%
CY2019	61,152	64,662	94.6%	0.2%
CY2020	66,397	71,255	93.2%	-1.4%*
CY2021	78,307	83,921	93.1%	-0.1%
CY2022	81,957	88,856	92.2%	-1.1%*

\*Indicates significant difference at  $p < .05$  between time periods. This measure was assessed on beneficiaries with a diagnosis of SUD in the relevant year and with continuous eligibility and full coverage, following 1115 Substance Use Disorder Demonstrations: Technical Specifications for Monitoring Metrics, v. 5.

Overall Change from 2017-2019 to 2020-2022				
	2017-2019 (Average)	2020-2022 (Average)	Absolute Change	Relative Change
Percent of beneficiaries with SUD who had an ambulatory care visit	94.5%	92.8%	-1.7*	-1.8%*

\*Indicates significant difference at  $p < .05$  between time periods. This measure was assessed on beneficiaries with a diagnosis of SUD in the relevant year and with continuous eligibility and full coverage, following 1115 Substance Use Disorder Demonstration: Technical Specifications for Monitoring Metrics, v. 5.

Note: Values are rounded to the first decimal, but absolute and relative change are calculated from values up to ten decimal points.

## Goal 5: To reduce the number of opioid-related overdoses and deaths within the state of Minnesota

The state hypothesized the Demonstration would decrease the mortality rate among Minnesota beneficiaries with SUD/OD. To evaluate progress toward this goal quantitatively, we analyzed data to assess several measures, including rates of all-drug and opioid overdose mortality among all state residents, among state Medicaid beneficiaries and among state Medicaid beneficiaries with a diagnosis of OUD.

### Summary of Claims-Based Measures

Between the baseline and initial Demonstration periods, overdose mortality rates increased.

This finding is consistent with national trends and trends in other states. Minnesota did not experience a reduction in drug overdose deaths during the initial three-year Demonstration period (**Exhibit 25a-c**).<sup>xvi,xvii</sup> A Centers for Disease Control and Prevention (CDC) study that used data abstracted from death certificates and medical examiner/coroner (ME/C) reports in 47 states and the District of Columbia reported that the rise in overdose deaths was driven mainly by two factors: 1) the physical and mental impacts of the COVID-19 PHE, including isolation and loss of social support, job loss, and housing instability; and 2) a reduction in the capacity and opportunities for intervention to prevent fatal outcomes. There was a 30 percent increase from 2019 to 2020 in drug overdose deaths nationwide.<sup>xviii</sup>

**Exhibit 24.** Summary of claims-based measures for Goal 5

Measures Examined	State’s Target	Directionality	Progress (Yes/No)
Drug overdose mortality: all Medicaid beneficiaries (count and rate)	Decrease	Increase	No
Opioid overdose mortality: all Medicaid beneficiaries (count and rate)	Decrease	Increase	No
Drug overdose mortality: beneficiaries with OUD (count and rate)	Decrease	Increase	No
Opioid overdose mortality: beneficiaries with OUD (count and rate)	Decrease	Increase	No

Note: Progress in these metrics is determined by the absolute change in the regression-adjusted averages in the baseline period (2017-2019) and the initial Demonstration period (2020-2022).

### All-drug overdose mortality rate

Between three-year baseline and initial three-year Demonstration periods, all-drug and opioid overdose mortality rates increased among all Medicaid beneficiaries (see **Exhibit 25a**). There was a significant increase in both the average all-drug rate and the average opioid overdose death rate. The average all-drug mortality rate rose from 0.279 (baseline) to 0.533 (Demonstration) per 1,000 beneficiaries, while the average opioid overdose death rate increased from 0.159 (baseline) to 0.385 (Demonstration) per 1,000 beneficiaries. The annual rate of all-drug overdose mortality increased from 0.295 (CY2017) to

0.592 (CY2022) per 1,000 beneficiaries. The rate of opioid overdose deaths increased from 0.169 to 0.455 per 1,000 beneficiaries in the same period.

**Exhibit 25a.** All Drug Overdose Mortality, All Medicaid Beneficiaries

Years	MN Medicaid Population				
	Eligible Population	Drug Overdose Deaths	Rate per 1,000 Beneficiaries	Opioid Overdose Deaths	Rate per 1,000 Beneficiaries
CY2017	1,430,265	422	0.295	241	0.169
CY2018	1,427,024	344	0.241	211	0.148
CY2019	1,412,679	426	0.302	226	0.160
CY2020	1,382,911	604	0.437	393	0.284
CY2021	1,464,794	835	0.570	611	0.417
CY2022	1,553,466	920	0.592	707	0.455

Notes:

- All beneficiaries with full benefits enrolled in Medicaid for at least one month during the calendar year or the 30 days prior to the beginning of the measurement period, consistent with metrics 26 and 27 in the CMS Medicaid Section 1115 Substance
- Use Disorder Demonstrations, Technical Specifications for Monitoring Metrics v. 5. Opioid deaths use the following ICD-10 codes: T40.1 (heroin); T40.2 (natural and semisynthetic opioids; T40.3 (methadone); and T40.4 (synthetic opioids other than methadone).
- The rate is (number of overdose deaths / number of beneficiaries) times 1,000. Data are for the calendar year (not Demonstration year). Source: Minnesota Department of Health.

The rate of all-drug overdose mortality among Medicaid beneficiaries with a diagnosis of OUD similarly increased, rising from 5.332 (CY2017) to 9.348 (CY2022) per 1,000 beneficiaries. The rate of opioid overdose deaths among Medicaid beneficiaries with OUD also increased from 3.601 to 8.242 per 1,000 beneficiaries during the same period. There was a significant increase in the average all-drug and the average opioid overdose death rate from the baseline to Demonstration periods. The average all-drug rate increased from 4.933 (baseline) to 8.568 (Demonstration) ( $p < 0.05$ ). The average opioid overdose death rate rose from 3.478 (baseline) to 7.213 (Demonstration) per 1,000 beneficiaries (at  $p < 0.05$ ).

**Exhibit 25b.** All Drug and Opioid Overdose Mortality, Medicaid Beneficiaries with OUD

Years	Medicaid Population with OUD				
	Eligible Population	Drug Overdose Deaths	Rate per 1,000 Beneficiaries	Opioid Overdose Deaths	Rate per 1,000 Beneficiaries
CY2017	35,823	191	5.332	129	3.601
CY2018	36,166	159	4.396	118	3.263
CY2019	35,300	179	5.071	126	3.569

Years	Medicaid Population with OUD				
	Eligible Population	Drug Overdose Deaths	Rate per 1,000 Beneficiaries	Opioid Overdose Deaths	Rate per 1,000 Beneficiaries
CY2020	34,177	233	6.817	185	5.413
CY2021	36,342	343	9.438	287	7.897
CY2022	39,795	372	9.448	328	8.333

Notes:

- All beneficiaries with full benefits enrolled in Medicaid for at least one month during the calendar year or the 30 days prior to the beginning of the measurement period and an opioid used disorder diagnosis, consistent with metrics 26 and 27 in the CMS Medicaid Section 1115 Substance Use Disorder Demonstrations, Technical Specifications for Monitoring Metrics v. 5. Opioid overdose deaths use the following ICD-10 codes: T40.1 (heroin); T40.2 (natural and semisynthetic opioids; T40.3 (methadone); and T40.4 (synthetic opioids other than methadone).
- The rate is (number of overdose deaths / number of beneficiaries) times 1,000. Data are for the calendar year (not Demonstration year). Source: Minnesota Department of Health

### Opioid overdose mortality rate

Statewide rates of all-drug overdose mortality per 1,000 population rose from 0.13 (CY2017) to 0.25 (CY2022), and statewide rates of opioid overdose mortality per 1,000 population similarly increased from 0.078 to 0.187 during the same time period.

**Exhibit 25c.** All-drug and Opioid Overdose Mortality, Statewide and National

Years	MN Statewide+		National <sup>^</sup>	
	Drug Overdose Death Rate/1,000 Population	Opioid Overdose Death Rate/1,000 Population	Drug Overdose Death Rate/1,000 Population	Any Opioid Overdose Death Rate/1,000 Population
2017	0.133	0.078	0.217	0.149
2018	0.115	0.063	0.207	0.146
2019	0.142	0.078	0.216	0.155
2020	0.190	0.125	0.283	0.214
2021	0.245	0.179	0.324	0.247
2022	0.248	0.187	0.326	0.250

+MN drug overdose death rate: [https://www.cdc.gov/nchs/pressroom/sosmap/drug\\_poisoning\\_mortality/drug\\_poisoning.htm](https://www.cdc.gov/nchs/pressroom/sosmap/drug_poisoning_mortality/drug_poisoning.htm)

MN Opioid Overdose rates are from: [Opioid Overdose Death Rates and All Drug Overdose Death Rates per 100,000 Population \(Age-Adjusted\) | KFF](#)

<sup>^</sup>National data on all drug overdose rates and national data on opioid overdose are from [Multiple Cause of Death Data on CDC WONDER](#). Accessed July 29, 2024. Centers for Disease Control and Prevention.

## Goal 6: To allow patients to receive a wider array of evidence-based services that are focused on a holistic approach to treatment

The state hypothesized that the Demonstration would increase the share of beneficiaries who are treated for OUD/SUD in ways that are consistent with evidence-based care. The initial evaluation design proposed evaluating progress toward this goal, in part, by incorporating measures of utilization of peer support services and experience of care from Drug and Alcohol Abuse Normative Evaluation System (DAANES) data collected by the state as part of reporting to the Substance Abuse and Mental Health Services Administration (SAMHSA). However, the measures were ultimately not used due to data availability and quality constraints in DAANES.<sup>27</sup> Further detail on these measures and plans to address these domains in the Summative Evaluation Report can be found in **Exhibit 4**.

The state will also measure progress towards this goal qualitatively, by collecting and analyzing primary data from interviews with beneficiaries and other stakeholders as part of the planned Summative Evaluation Report. As reported in the MPA, we have gathered and presented data from the provider survey describing provider challenges and feedback on the transition to new evidence-based approach, including challenges in applying ASAM criteria during assessment and accessing the necessary information from ASAM trainings. To facilitate the use of evidence-based services, DHS has been focused on the implementation of a new process and system for UM through the Kepro UM program. This program monitors and provides guidance to assist providers with implementing ASAM standards and the appropriate LOC. Data from a recent provider survey are also presented below to provide context for provider experience under the Demonstration. Providers reported about their ability to refer to other LOCs and any organizational changes they undertook as part of their participation in the Demonstration.

As noted in the MPA, a broad group of action items help to achieve implementation of residential treatment provider qualifications that meet the ASAM criteria standards or other nationally recognized, evidence-based SUD-specific program standards. Moreover, this goal was affected by Minnesota Laws 2021, First Special Session, Chapter 7, Article 11, Sections 18-23 which required that residential treatment programs licensed by DHS in accordance with Minnesota Statutes, section 245G.21 and receive payment through MHCP, certify as a Demonstration provider and meet provider standard requirements by January 1, 2024.

### Enabling Providers to Deliver Comprehensive SUD care

After two full years of implementation, most provider survey respondents found the Demonstration “Effective” or “Very Effective” in several important ways. Fifty-four percent (13) reported effectiveness in

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<sup>27</sup> DAANES data does not represent all facilities, and since reporting requirements change over time, the denominator of providers is inconsistent. Service satisfaction measures are reported-out by clinicians, and therefore the state elected not to include them out of concern for potential reporting bias.

promoting patient-centered care for OUD treatment in the state, and approximately 67 percent (16) of respondents reported effectiveness in facilitating transitions to different ASAM LOCs for OUD treatment. As described above, some providers have been able to increase capacity and build referral networks as part of the Demonstration. One provider reported, “I have been a proponent of this waiver since its inception. It is good to see more providers in the state adapt the ASAM criteria, and I believe it also benefits the clients who need our treatment services.” Others noted that an expanded continuum of care, including MOUD and rate increases specifically for counselors, were improving the delivery of SUD services.

However, among providers, some also felt the Demonstration was not effective at accomplishing these goals and detailed the challenges with the Demonstration’s administrative changes. One explained, “It seems like the cart was put before the horse and DHS did not take into account that during a worldwide PHE, increase in overdose deaths and an already slim workforce the impact that adding another system, checkbox or thing to do- would have not only has a financial impact but an emotional impact on our team.” Another noted, “It provided more checkboxes and not actual interventions to create quality care. Referral agreements may harm the referral process by potentially limiting who people think they can refer to.” Other providers reported more positive experiences, such as one who wrote, “The professional team at MN SUD Demonstration Waiver have been accessible, responsive, and helpful throughout this transition.”

**Referrals to ASAM Levels of Care.** As part of the Demonstration, all providers, both residential and outpatient, electing to participate must furnish verification of formal referral arrangements to ensure access to each of the ASAM LOCs. In addition, changes to MCO contracts may affect access to care and coordination for MCO enrollees and provider billing for these services. We surveyed providers about their organizations’ ability to provide access for patients with Medicaid to all ASAM LOCs through referrals. Most reported that they can provide access for patients with Medicaid through referral to ASAM LOCs 1.0, 2.1, 3.1, 3.3, 3.5, and 3.7. **Exhibit 26** summarizes the results for each LOC.

**Exhibit 26.** Minnesota providers’ self-reported ability to provide referrals at each ASAM LOC

Level	All or Most of the Time	Some	Never
1.0 Outpatient	88%	8%	4%
2.1 Intensive outpatient	92%	0%	8%
3.1 Clinically managed low-intensity residential treatment	76%	12%	12%
3.3 Clinically managed high-intensity and population-specific services	80%	12%	8%
3.5 Clinically managed residential services	96%	0%	4%
3.7 Medically managed withdrawal management	68%	20%	12%

Although most providers can provide access to Level 3.1 (clinically managed low-intensity and population-specific services) most of the time, those that are unable to do so cited limited bed availability and lack of low-intensity treatment centers. Similarly, most providers can refer patients to Level 3.3 (clinically managed high-intensity and population-specific services), but providers face challenges in finding openings at that level of care. One provider said, “There is only one program in MN offering this level of care, very hard to get someone into that program.” Another noted, “There is only one program in Minnesota, and it does not serve women.”

Providers reported the greatest challenge in accessing medically managed WM for their patients, with 32 percent of respondents reporting that they can access it never or only some of the time, and only 68 percent reporting that they can access it all or most of the time (**Exhibit 26**). In particular, providers commented that there are few programs, often not located nearby, and that there are no programs for adolescents. Most of the providers who responded “Never” reported that they do not offer this LOC. DHS has also been working to address the current gap in the state’s statutes for LOC 3.7 by reaching out to ASAM and gathering internal information on the issues with the requirement that a physical exam be completed within 24 hours of admission.<sup>28</sup> However, when asked about organizational changes in the treatment of patients with OUD, some providers reported an increase in access and services. They noted that they are providing enhanced medical services such as MOUD and referring more patients to MOUD treatment and other providers noted that they can accept more clients due to MOUD offerings as well as increased screening and psychoeducation (i.e., a combination of cognitive-behavioral therapy, group therapy, and education about the disease) for OUD.<sup>29</sup>

## Provider Capacity

To ensure sufficient provider capacity at critical levels of care, Minnesota identified the need to conduct a provider capacity assessment that evaluated capacity at all LOCs and availability of MOUD, thereby establishing a baseline to measure progress during the Demonstration.<sup>30</sup> In addition, the state required all certified providers to agree to Demonstration reporting requirements that also supported measurement of Demonstration outcomes. Data from a recent provider survey are presented below to provide context for provider experience under the Demonstration.

In the MPA, the state demonstrated progress by assessing provider capacity at the organizational level and on MOUD, but individual practitioner data was not available to assess capacity at a more detailed level. Moreover, the MPA focus groups with state staff members and providers identified workforce shortages as a problem that was further aggravated by the PHE.

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<sup>28</sup> Minnesota Substance Use Disorder System Reform Medicaid Section 1115 SUD Demonstrations Monitoring Report – Part B Version 4.0, Demonstration Year 4, Quarter 2.

<sup>29</sup> Sarkhel S, Singh OP, Arora M. Clinical practice guidelines for psychoeducation in psychiatric disorders general principles of psychoeducation. *Indian J Psychiatry*. 2020 Jan;62:S319-S323. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7001357/>.

<sup>30</sup> Available at <https://edocs.dhs.state.mn.us/lfserver/Public/DHS-8278-ENG>

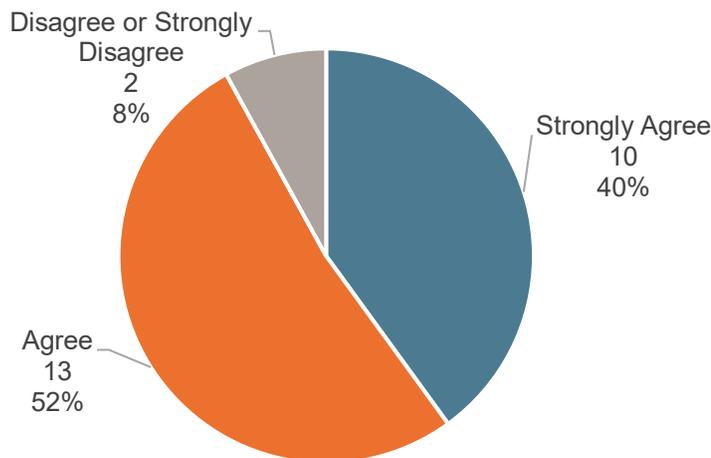
The current provider survey suggests that some workforce shortages and pressures have abated since the MPA was written. When asked about staffing adequacy for delivering treatment to Demonstration participants, 23 out of 25 respondents selected “Strongly Agree” or “Agree” (**Exhibit 27**). Providers who did not feel they had adequate staffing noted that additional administrative support and mental health professionals are needed to support the treatment of Demonstration participants. However, other respondents noted improvements, such as they had been able to increase salaries because of the increased reimbursement rates and the ability of LADCs to spend more one-on-one time with clients. They also noted plans to add more MOUD providers and interest in adding a prescribing provider to their practice. When asked about organizational stability and sustainability, for example, one provider shared, “We have seen more clients, and it has been easier to accept clients at a faster rate.” Another provider noted, “Thus far, the waiver has improved our ability to provide care to our clients. Our organization continues to be stable and sustainable. We do not plan to make additional changes.”

One Demonstration provider said, “The increased [waiver] rate has helped a little to sustain as counselor wages have increased greatly and [there has not been a] rate increase in general from DHS for a while.” In contrast, some respondents shared ongoing staffing challenges since the Demonstration began that also had been identified in the MPA, such as retaining LADCs. One provider commented, “The waiver demonstration has increased our workload without rate increases due to being a Withdrawal Management program and the only level of care excluded from the rate adjustments.” Some providers suggested rate increases to promote organizational sustainability. One wrote, “If all the payment issues are fixed, it will have a positive impact on our sustainability.”

Providers reported staffing challenges both related to the Demonstration requirements and outside the Demonstration (i.e., general workforce shortages). For example, one provider noted that there have always been shortages of LADCs and mental health providers, “Due to staff shortages, we have struggled to provide the required amount of mental health practitioners based on the [number] of LADCs we have.”

NORC is unable to confirm the change in provider capacity at the individual practitioner level (apart from determining unique prescribers of MOUD), as state data limitations do not allow for counting individual practitioners. In the Summative Evaluation Report, we will update the count of certified providers at each level but will not be able to enumerate the total number of individual-level full-time-equivalents at any level.

**Exhibit 27.** Self-reported provider administrative and clinical staffing capacity

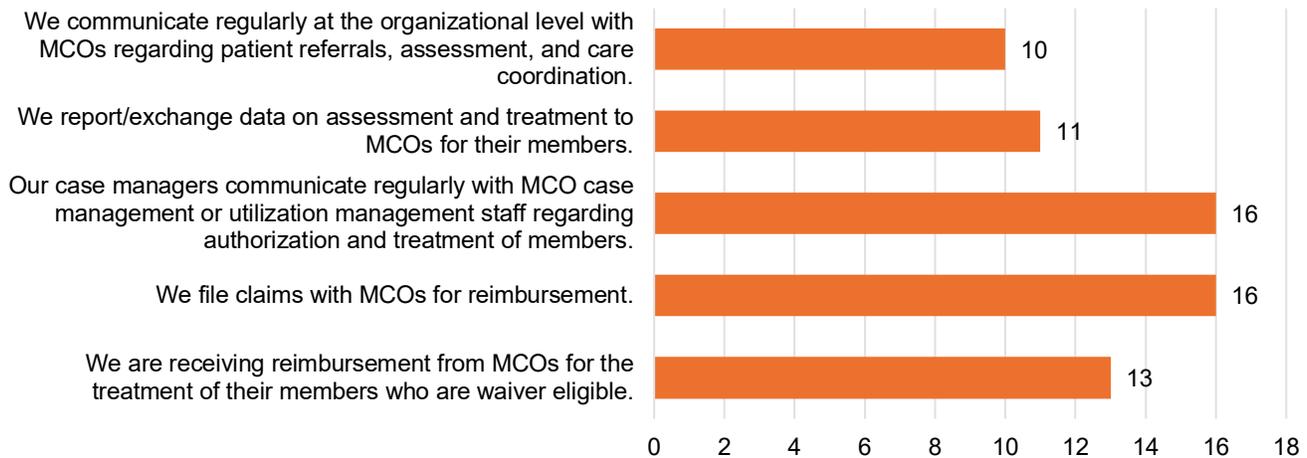


### Working with Managed Care Organizations

In Minnesota, most Medicaid patients are enrolled in managed care organizations (MCOs) that cover and coordinate physical, mental, and behavioral healthcare. By working with MCOs, certified SUD providers facilitate access to and coordination of behavioral healthcare with other services, e.g., primary care. The MPA collected data when certified providers had just begun to bill and work with the MCOs serving Minnesota’s Medicaid population. As a result, certified providers reported limited coordination and challenges in coordinating with the eight different MCO organizations. At the same time, state staff members responsible for contracting and oversight were actively engaged in aligning the Demonstration with the managed care program. The provider survey documents measurable progress in coordinating the care of enrollees who are treated by Demonstration providers. As shown in **Exhibit 28**, almost two-thirds of providers are coordinating care for patients and billing MCOs for these services. However, 52 percent (13) of providers also reported that they do not communicate as regularly at the organizational level with MCOs regarding patient referrals, assessment, and care coordination compared to the communications happening at the clinic or provider level. In addition, only 64 percent (16) of the providers are receiving reimbursement. One provider indicated that they are having to respond to MCO denials and participate in appeals, which may be a possible explanation for the lack of reimbursement after claims have been filed. The potential effects, if any, on quality of care for enrollees is not clear. According to DHS, they have limited information about MCO processes for monitoring quality of care and rely on maltreatment investigations and licensing visits to monitor quality of care. As noted, the Summative Evaluation Report will incorporate interviews with enrollees in an effort to understand their experience of care. Although MCOs maintain a separate utilization review process from the Demonstration, efforts by DHS to align the two processes are ongoing. Specifically, Kepro has introduced InterQual medical review software that can be adopted by MCOs and integrated with their information technology and would standardize UM across the

different populations.<sup>31</sup> Finally, fewer providers reported exchanging data on assessment and treatment with MCOs, although they are communicating about treatment plans.

**Exhibit 28.** Self-reported provider activities for coordinating MCO member care\*



\*Providers could select more than one response for this question, so the total does not add up to 25.

## Goal 7: Reduced utilization of emergency departments (EDs) and inpatient hospital settings for treatment where the utilization is preventable or medically inappropriate through improved access to other continuum of care services

The state hypothesized that the Demonstration would reduce the utilization of EDs, avoidable hospitalizations, hospitalizations for ambulatory-care-sensitive conditions, and intensive inpatient services. To evaluate progress toward this goal quantitatively, we analyzed data to assess several measures, including all-cause acute care readmissions (defined as the percentage of acute inpatient stays during the measurement year that were followed by an unplanned acute readmission for any diagnosis within 30 days), ED utilization, and ED visits following discharge, among others.

### Summary of Claims-Based Measures

For all three measures associated with Goal 7 (**Exhibit 29**), we do not observe progress toward the state’s targets. We observed no change in ED utilization per 1,000 beneficiaries for SUD. There was an increase in readmissions and ED visits following discharge from treatment and a decrease in follow-ups after ED visit for AOD use or dependence.

<sup>31</sup> Change Healthcare Partners (2002) The ASAM Criteria Powered by InterQual [PowerPoint slides] Change Healthcare LLC.

**Exhibit 29.** Summary of claims-based measures for Goal 7

Measures Examined	State’s Target	Directionality	Progress (Yes/No)
ED utilization per 1,000 beneficiaries for SUD	Decrease	No change	No
ED visits following discharge from treatment <sup>32</sup>	Decrease	Increase	No
Follow-up after ED visits for AOD use or dependence diagnosis	Increase	Decrease	No

Note: Progress in these metrics is determined by the absolute change in the regression-adjusted averages in the baseline period (2017-2019) and the initial Demonstration period (2020-2022).

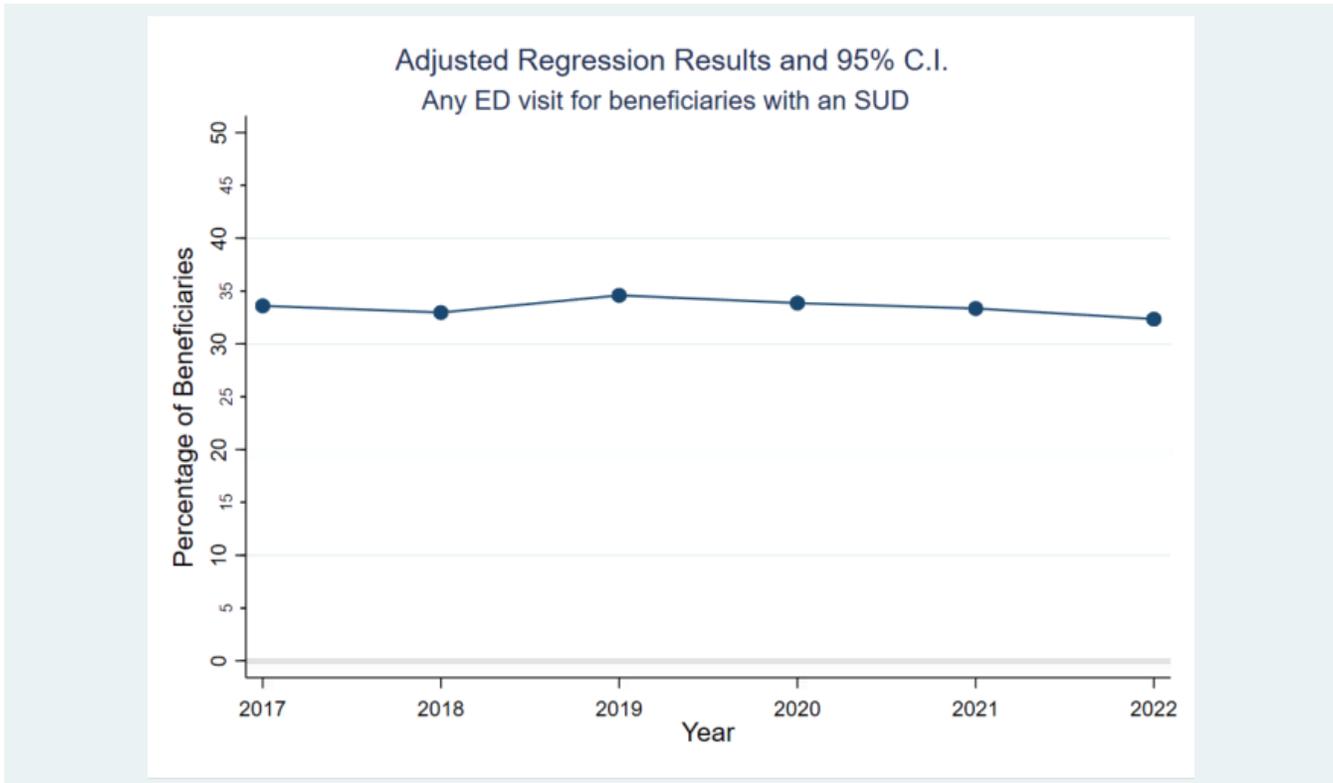
### ED utilization per 1,000 beneficiaries for SUD

The proportion of beneficiaries with an SUD who had any ED visit (**Exhibit 30**) remained relatively stable (0.2 percent point increase) during the initial three-year Demonstration period. During the three-year baseline period, there were 681.3 ED visits per 1,000 beneficiaries with an SUD compared to 691.2 ED visits per 1,000 beneficiaries with an SUD during the Demonstration period. During the Demonstration period, the rate per 1,000 beneficiaries decreased from 705.8 (CY2020) to 610.5 (CY2022). Approximately one-third of beneficiaries with an SUD diagnosis had at least one ED visit during the baseline and Demonstration periods. Beneficiaries with more than one visit had an average of 3.8 ED visits both during the baseline and Demonstration periods.

**Exhibit 30.** ED utilization among beneficiaries with an SUD, CY2017-CY2022

<b>Hypothesis:</b> The demonstration will decrease ED utilization for beneficiaries with an SUD.
<b>Measure:</b> ED utilization per 1,000 beneficiaries for SUD, proportion of beneficiaries with any ED visit, and mean number of visits for those with more than one visit
<b>Measure steward:</b> CMS metric 23

<sup>32</sup> While ED visits following discharge from treatment measure was originally associated with goal 2 in the evaluation design plan, it was moved to goal 7 for this report because the measure is more closely aligned with the other ED visit measures to indicate follow-up efforts to reduce ED readmissions and utilization of EDs.



Study Period	Number of ED Visits	Total Beneficiaries with an SUD	Rate/1,000 Beneficiaries	Absolute Change from Prior Year	Percent of Any ED Visit	Relative Change from Prior Year	Percent of Beneficiaries with >1 Visit	Mean Number of ED Visits (for >1 Visit)	Absolute Change in Percent of Beneficiaries from Prior Year
CY2017	67,998	98,862	687.8	-	33.6%	-	12.0%	3.8	-
CY2018	67,453	99,941	674.9	-12.9	33.0%	-0.6%	11.9%	3.8	-0.1%
CY2019	64,787	98,625	672.8	-2.1	34.6%	+1.6%	13.3%	3.8	+1.4%*
CY2020	66,810	94,660	705.8	+30.9*	33.9%	+0.8%	12.1%	3.8	-1.2%*
CY2021	69,759	102,977	677.4	-28.4*	33.4%	-0.6%	11.9%	3.8	-0.3%*
CY2022	66,363	106,126	610.5	-66.9*	32.3%	-1.1%	11.5%	3.7	-0.3%*

Overall Change from 2017-2019 to 2020-2022				
	2017-2019 (Average)	2020-2022 (Average)	Absolute Change	Relative Change
Total ED visits per 1,000 beneficiaries with an SUD	681.3	691.2	9.9*	0.01*
Proportion of beneficiaries with any ED visit	34.7%	33.2%	-0.5*	0.6%*

\*Indicates significant difference at p<.05 between time periods.

Notes:

- Includes ED visits that result in an inpatient stay.
- Values are rounded to the first decimal, but absolute and relative change are calculated from values up to ten decimal points.

## ED visits following discharge from treatment

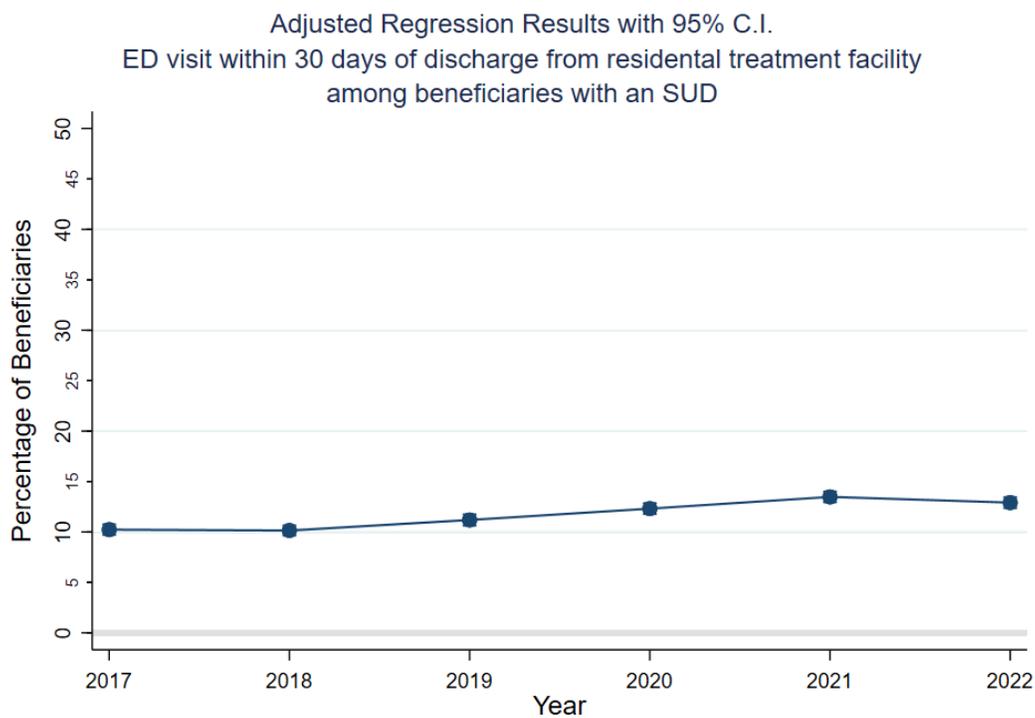
The percentage of beneficiaries with at least one ED visit after discharge from a residential treatment facility (for beneficiaries with an SUD) increased 2.4 percent during the initial three-year Demonstration period (**Exhibit 31**). The rate of treatment stays with at least one ED visit also increased (3.9 percent) between the three-year baseline and Demonstration periods. CY2018 had the lowest rate of ED visits (10.2 percent), whereas CY2021 had the highest rate of ED visits (15.2 percent) following a residential stay.

**Exhibit 31.** ED utilization within 30 days of discharge from a residential treatment facility among beneficiaries with an SUD, CY2017-CY2022

**Hypothesis:** The demonstration will decrease ED utilization following treatment for beneficiaries with an SUD.

**Measure:** Rate of ED visits within 30 days of discharge from a residential treatment facility and proportion of beneficiaries with any SUD

**Measure steward:** This is a modification of CMS metric 23, to measure ED visits 30 days following discharge from a residential treatment facility.



Study Period	Number of ED Visits within 30 Days of Discharge from Residential Treatment Facility	Total Discharges from Residential Treatment Facility	Rate of ED Visits (Percent of Index Stays with ED Visit)	Change from Prior Year	Total Beneficiaries with Treatment	Percent of Beneficiaries with ED Visit Following Discharge	Change from Prior Year
CY2017	1,687	16,319	10.3%	-	13,792	10.2%	-
CY2018	1,726	16,927	10.2%	-0.1%	14,317	10.1%	-0.1%
CY2019	1,982	17,271	11.5%	1.3%*	14,304	11.2%	1.0%*
CY2020	2,576	18,612	13.8%	2.4%*	14,196	12.3%	1.1%*
CY2021	3,318	21,820	15.2%	1.4%*	15,347	13.5%	1.2%*
CY2022	3,447	23,503	14.7%	-0.5%	16,105	12.9%	-0.6%

\*Indicates significant difference at p<.05 between time periods.

Note: If a transfer to another facility (either treatment or hospital) occurs within one day, then the discharge date would be from the new facility. If the time elapsed is >1 day (the person is newly admitted to a residential treatment facility), then the clock for the 30 days starts for the new facility.

Overall Change from 2017-2019 to 2020-2022				
	2017-2019 (Average)	2020-2022 (Average)	Absolute Change	Relative Change
Percent of treatment stays with an ED visit	10.7%	14.6%	3.9*	36.9%*
Percent of beneficiaries with ED visit following discharge from treatment	10.5%	12.9%	2.4*	22.7%*

\*Indicates significant difference at p<.05 between time periods.

Note: Values are rounded to the first decimal, but absolute and relative change are calculated from values up to ten decimal points.

### Follow-up after ED visit for AOD use or dependence diagnosis

There was a 2.0 percentage point decrease in the percent of ED visits for alcohol or other substance use with a follow-up contact from the three-year baseline period (28.8 percent) to the initial three-year Demonstration period (26.9 percent) (**Exhibit 32**). Follow-up visits were the highest in CY2018 (30.7 percent) and the lowest in CY2020 (26.5 percent). Similarly, there was also 2.6 percentage point decrease in beneficiaries with a follow-up contact within 30 days of discharge.

The metrics on timely follow-up after ED visits indicate that it may take the full length of the demonstration to achieve outcomes related to engaging with individuals who have not succeeded in overcoming SUD/ODU and/or providing holistic, coordinated, patient-centered treatment.

**Exhibit 32.** Follow-up contacts for beneficiaries with alcohol or other substance use disorder and an ED visit, CY2017-CY2022

**Hypothesis:** DHS will increase follow-up contacts for beneficiaries with an ED visit for alcohol or other substance use.

**Measure:** Follow-up after ED visit for alcohol and other drug abuse or dependence (30-day) (any follow-up and average per-beneficiary rate) for beneficiaries with SUD

**Measure steward:** NCQA; NQF #2605; CMS Medicaid Adult Core Measure metric 17(1)

**Adjusted Regression Results**

Study Period	Total Follow-up Contact in 30 Days	Total ED Visits for AOD	Percent of ED Visits with Follow-up Contact	Absolute Change from Prior Year	Number of Beneficiaries with AOD Discharged from an ED	Percent of Beneficiaries with Follow-up Contact within 30 Days of Discharge	Absolute Change from Prior Year
CY2017	3,253	11,548	28.2%	-	9,407	31.1%	-
CY2018	3,653	11,879	30.7%	2.6*	9,203	33.2%	2.2*
CY2019	2,890	10,556	27.4%	-3.4*	8,221	32.9%	-0.3
CY2020	2,640	9,962	26.5%	-0.9	7,986	28.8%	-4.1*
CY2021	2,943	10,859	27.1%	0.6	8,795	29.0%	0.2
CY2022	2,755	10,210	27.0%	-0.1	8,379	31.5%	2.4*

**Overall Change from 2017-2019 to 2020-2022**

	2017-2019 (Average)	2020-2022 (Average)	Absolute Change	Relative Change
Percent of ED visits with a follow-up contact	28.8%	26.9%	-2.0*	-6.8%*
Percent of beneficiaries with a follow-up contact within 30 days of discharge	32.4%	29.7%	-2.6*	-8.1%*

\* Indicates significant difference at p<.05 between time periods.

Notes:

- ED visits for beneficiaries ≥18 of age with a principal diagnosis of AOD abuse or dependence who had a follow-up visit for AOD abuse or dependence.
- Values are rounded to the first decimal, but absolute and relative change are calculated from values up to ten decimal points.

# Conclusions

The findings in this interim evaluation report document that the state has made mixed progress toward the Demonstration's goals, hypotheses, and milestones. The state continues to address the contextual and operational challenges of implementing a Demonstration during a PHE and to fully align its state policies, regulations, and statutes with the ASAM criteria.

Despite the COVID-19 PHE, by 2022 (from CY2021-2022), the Demonstration began to show progress in the important areas of diagnosis and assessment and access to treatment and MOUD. When providers were surveyed in 2023, they confirmed that they were increasingly able to provide access to all levels of care for most individuals and were able to coordinate access to other services, including mental health and physical care. The PHE masked the ongoing efforts to develop a patient-centered, more integrated system of care for people with SUD/ODU through the waiver process beginning with treatment to support long-term recovery. DHS and providers were actively pursuing the Demonstration's seven goals during the PHE. At the same time, the data on hospital and ED utilization suggests that there remain gaps in access and engagement for some Minnesotans, who may require additional support to engage in and complete treatment.

DHS is focused on several changes that support progress toward the seven goals and six milestones. First was the adoption the ASAM levels of care and ensuring that certified providers could provide or refer patients for all LOCs and assist in transitions of care during treatment. Second was establishing a system of UM to monitor access to appropriate treatment. Third was expanding access to MOUD by increasing both prescribing and referrals. The results of the provider survey indicate that providers believe that there has been significant progress in implementing these changes. As a result, respondents report that the Demonstration is achieving its goals of identification and initiation of treatment, getting patients to the appropriate LOC, and facilitating transitions to different LOCs (engagement). Most providers also report that they are able to refer their patients to all LOCs. The majority of providers also reported that they felt the Demonstration facilitated transitions to ASAM LOCs for OUD treatment and promoted patient-centered care. As reported in the MPA, there was a tension between providers and the new UM requirements. Providers in the current survey also reported this tension. All except one provider had received training on Kepro data reporting and submission, and most providers reported that UM is integrated into their workflow and that they have adequate staff capacity. Nonetheless, implementation has posed an administrative burden, and the state has responded by introducing legislation to support paperwork reduction, and DHS has made specific policy changes to adjust UM requirements and reduce burden.

Although most of the providers responding to our survey in early 2023 reported that the Demonstration had been effective in meeting its goals, our analysis of the quantitative data through CY2022 shows a more complicated picture of the implementation. Some of the key findings concerning utilization, access, and overdose deaths include:

- Utilization of services

- There was a **very small decline in the proportion of beneficiaries with an SUD receiving ambulatory or preventative care**. This mirrors the nationwide trend during the COVID-19 PHE of the reduction in the use of outpatient ambulatory services.<sup>xix,xx</sup>
- The **rate of ED visits per 1,000 beneficiaries with an SUD remained relatively stable** across the three-year baseline and initial three-year Demonstration period, and approximately one-third of beneficiaries with an SUD diagnosis had at least one ED visit during the baseline and initial Demonstration periods. However, the rate per 1,000 did decrease from 705.8 to 610.5 from CY2020 to CY2022. The measure for ED visits is all-cause ED visits, which may include visits related to COVID-19. The ED can also be a critical point of entry into care, and evidence indicates that MOUD can be initiated following an ED visit.<sup>xxi</sup> The **proportion of beneficiaries discharged from residential treatment who visited an ED increased** by 2.4 percent during the Demonstration period, with the rate of treatment stays with at least one ED visit also increasing between the baseline and Demonstration periods (by 3.9 percent). Beneficiaries with more than one ED visit had an average of 3.8 ED visits during both the baseline and Demonstration periods, suggesting that it is difficult to reduce ED use for this population. This measure is for all-cause ED use and may include COVID-19-related ED use.
- The state made several efforts to improve care coordination and transitions between levels of care, such as linking beneficiaries with OUD and SUD to community-based services and supports. Despite efforts from the state to improve care coordination and transitions between levels of care, the Demonstration observed an **increase in readmissions among beneficiaries with an SUD**. The average readmission rate increased from 11.8 percent during the three-year baseline period to 12.7 percent during the three-year Demonstration period. CY2017 had the lowest rate of readmissions, whereas CY2022 had the highest. The proportion of beneficiaries with any readmission increased by 0.8 percentage points from the baseline period to the Demonstration period. The rate of readmission for beneficiaries with more than one stay also increased from 19.5 percent to 20.4 percent.
- Access to medication
  - The proportion of **beneficiaries with OUD who initiated MOUD increased from 42.6 percent in CY2017 to 52.9 percent in CY2022**, with the largest increase observed between CY2018 (25.6 percent) and CY2019 (52.5 percent) in the baseline period. During the COVID-19 PHE, the state undertook measures to sustain and expand access to MOUD, such as enabling telehealth services for prescriptions. Increased use of MOUD rose at similar rates in both urban and rural areas. Despite an increase in the baseline period from 54.5 percent in CY2017 and 66.2 percent in CY2019,, there was an overall decrease in the proportion of beneficiaries receiving pharmacotherapy continuously for OUD for at least 180 days.
- Access to services
  - The average **proportion of beneficiaries who engaged in treatment within 34 days of diagnosis increased** between the three-year baseline and three-year Demonstration periods. During the baseline, timely treatment engagement increased by 2.2 percentage points between CY2017 (14.3 percent) and CY2018 (16.5 percent). Treatment engagement dipped slightly

during the Demonstration CY2020 (to 15.7 percent) and increased again in Demonstration CY2022 (to 16.4 percent).

- The **average rates of initiation of treatment within 14 days of diagnosis remained relatively stable** between the three-year baseline and three-year Demonstration periods, with an overall increase in the number of beneficiaries with a new diagnosis of SUD from 49,600 in CY2017 to 53,644 in CY2022. We also observed slight annual increases in treatment initiation from 2017 (37.5 percent) to 2020 (39.3 percent), followed by small declines in CY2021 (38.6 percent) and CY2022 (36.6 percent).
- There was an **increase in 30-day follow-up contacts for beneficiaries with alcohol or other SUDs and an IMD stay** during the three-year Demonstration period, continuing a trend observed in the baseline period. Since CY2017, more than half of IMD stays had a follow-up visit within 30 days. The proportion of IMD stays with a follow-up visit within 30 days has increased year over year from 55.3 percent in CY2017 to 68.1 percent in CY2022.

The **percent of beneficiaries with a follow-up contact within 30 days of discharge from an ED was lower** in the initial three-year Demonstration period, declining from an average of 28.8 percent in the baseline period to an average of 26.9 percent in the Demonstration period. Follow-up visits were the highest in CY2018 (30.7 percent) and the lowest in CY2020 (26.5 percent). Similarly, there was also 2.6 percentage point decrease in beneficiaries with a follow-up contact within 30 days of discharge.

- Overdose deaths

- **Overdose deaths increased** during the initial three-year Demonstration period. This increase could be partly attributable to the growing prevalence of the lethal opioid fentanyl in the circulating illicit drug supply.<sup>xxii</sup>

# Lessons Learned, Interpretations, and Policy Implications

Drawing conclusions regarding the impact of the Demonstration based on these results is not recommended. In light of the challenges of the COVID-19 PHE, these results are likely atypical for the anticipated change for some measures, and comparisons with other states' trends are not possible due to the varying nature and timing of the intensity of the PHE. In addition, these analyses only include data through 2022. In 2021, a legislative mandate passed that required all residential and WM providers to certify in the Demonstration and meet provider standards requirements by January 1, 2024. Since that time, the number of these types of providers participating in the Demonstration has grown, and this will likely impact utilization and access across the state. In the Summative Evaluation Report, we will be able to better understand trends in the baseline and Demonstration periods using the quarterly data. In addition to the 2021 mandate, there are several factors that support the hypothesis that the results in the Summative Evaluation Report may look different:

- **Staffing.** During the COVID-19 PHE, the state faced several significant barriers, including a hiring freeze, staff shortages, and staff turnover. Lower rates of ED visits and follow-up services likely reflect the shift in provider priorities to responding to COVID-19-related health care services and the availability of services.
- **Beneficiaries.** This report presents the experiences and perceptions of certified providers and documents the steps taken by the state to further develop the staff, systems, and processes needed to implement the Demonstration. It does not, however, include the experiences and perceptions of the Medicaid beneficiaries covered by the waiver and served by the Demonstration providers.
- **Enhanced rates.** The requirement for residential (as well as outpatient providers) along with the enhanced payment rates may lead to wider access to services for Medicaid beneficiaries at these facilities.<sup>xxiii</sup>
- **Implementation of Direct Access.** This development expands beneficiary choice and enables quicker referrals to access SUD services and will improve care coordination across LOCs and provider agencies. This could lead to higher rates of treatment initiation and engagement and reduce ED use.
- **MOUD prescribing.** The state anticipates an increase in the number of providers who are actively prescribing MOUD due to state-wide initiatives to expand eligibility for prescribing, as well as the removal of the requirement for a DEA "X-waiver" to prescribe buprenorphine. The Summative Evaluation Report will include a reexamination of unique prescribers of MOUD, updating the baseline PCA. The state applied for and was granted the COVID-19-modified take-home schedule for opioid treatment program (OTP)-dispensed methadone in March 2020 and implemented it as a variance under Minnesota licensing authority. With the termination of the PHE, Minnesota issued a concurrence with the Substance Abuse and Mental Health Services Administration (SAMHSA) to continue those allowances until May 11, 2024.

## Interactions with Other State Initiatives

**Telehealth.** The COVID-19 emergency waiver opened up all treatment services to telehealth, including audio-only services, to accommodate clients in remote locations. That waiver has ended, but the Behavioral Health Department received another waiver that allowed outpatient services to be delivered via telehealth until June 2023. The continued support and use of telehealth may also contribute to improved entry into treatment, as well as the use of treatment and recovery services. A report by the DHS that assessed the use of telehealth among Medicaid beneficiaries before and during the COVID-19 PHE (with analyses through December 2020) found that behavioral health services were used at a higher rate (30 percent vs. 19 percent for nonbehavioral health care) and that there was a larger increase in behavioral health care delivered only through telehealth vs. nonbehavioral health (17 percent vs. 3 percent) both before and after the PHE.<sup>xxiv</sup>

**Housing.** To date, in Minnesota, some housing services have been provided through the Behavioral Health Fund. Beneficiaries with very high risk for relapse (ASAM Risk Rating 4 in Dimensions 5 or 6) can receive residential room and board, while those who are at high risk and non-compliant (Level (risk rating?)4, Dimension 4) may receive outpatient room and board. The state currently provides housing stabilization services to individuals with disabilities (including SUD) through its 1915(i) state plan.<sup>xxv</sup> Several states have successfully incorporated supportive housing services for individuals with SUD into their Section 1115 Demonstrations, including California, Hawaii, New Mexico, Oregon, Virginia, and Washington;<sup>xxvi</sup> these programs offer enhanced services in addition to case management.

**Care Coordination.** The state is exploring utilization of a cloud-based service such as the Omnibus Care Plan (OCP), a care coordination platform created by SAMHSA that facilitates the service coordination for recipients who are being served by multiple providers and provider networks. Service coordination between different providers and provider networks will be one of the most critical components of the Integrated Behavioral Health project, Continuum of Care/SUD reform project, 1115 SUD Waiver project, and the Housing Stabilization Services project. OCP would provide a cloud-based service coordination tool for any provider to use with other providers, the state, counties, and service recipients. The state has been undertaking an extensive redesign of case management and care coordination services in Medicaid, and SUD-related needs will be considered in the design.

**Prescription Drug Monitoring Program Improvements.** Under the direction the Board of Pharmacy (BOP), the state is planning to enhance PMP functionality and interoperability, including linking it to systems in which prescribers will be able to view electronic health records and easily link them with the PMP (currently, staff have to leave the electronic health record, go to the PMP, and return to the electronic health record). The Minnesota Department of Health applied for and received CDC Overdose Data to Action funding, a key strategy that supports the improvement of PMP functionality, interoperability, and provider utilization.<sup>xxvii</sup> Minnesota is currently connected to the interstate sharing hub PMP Inter-Connect and is presently sharing access with the Military Health System, the District of Columbia, and 40 states who wish to share access or who have authority to share access according to their laws. The Behavioral Health Division will actively collaborate with and support the efforts of the

BOP in expanding interstate data sharing agreements. In addition, the BOP will explore the potential use of additional funding through CMS or SAMHSA to potentially expand interstate data sharing possibilities, as other states have done.

**Opioid Prescribing Improvement Program (OPIP).** To enhance the identification of long-term opioid use directly correlated to clinician prescribing patterns, Minnesota refines the prescriber reports. Providers whose prescribing rate is above the threshold for any of the five measures are required to participate in the quality improvement program if they also prescribed above a certain volume of opioid analgesic prescriptions to Minnesota Medicaid and MinnesotaCare enrollees in the measurement year. In 2023, Minnesota passed legislation to sunset OPIP, with the program sunseting by December 31, 2024.<sup>xxviii</sup> In the meantime, DHS will work to expand prescriber certification and will continue to refine reporting and quality improvement processes.

**Minnesota e-Health Initiative.** This public collaboration is focused on accelerating the adoption and use of e-health. The Advisory Committee represents the spectrum of Minnesota's health community, including providers, payers, public health agencies, researchers, vendors, consumers, and more. The e-Health Initiative will continue to encourage and support efforts to implement e-prescribing of controlled substances (EPCS) by providing input on e-Health Strategies for Preventing and Responding to Drug Overdose and Substance Misuse and addressing ongoing priority topics such as implementation of SCRIPT standards, use of diagnosis codes on prescriptions, advancing medication management therapy, and improving the medication reconciliation process.

# Recommendations

Recommendations provided below reflect the findings above and the research on initiatives and tools developed and implemented in other states.

## Recommendations

Based on the results of this interim evaluation, Minnesota could consider the following actions:

- **Collaborating with providers** to examine what is needed to improve follow-up services from the ED as well as any treatment services, such as improved infrastructure, more personnel, or improved health information technology, to document transitions and care management services. The state could also consider incentives and penalties to focus on improving follow-up and reducing ED use.
- **Continue examining how to obtain comprehensive information on the health workforce that serves the Medicaid population.** This will enable an assessment of what percent of licensed health care workers do not serve Medicaid beneficiaries and inform efforts to increase provider participation in the program, thereby facilitating access to care and widening the referral network. This information will also help DHS understand how to increase recruitment and retention of providers in rural and underserved areas.
- **Consider mechanisms to monitor and assess the quality of care provided through managed care.** For example, some states (at least 17 as of 2022) have used financial incentives tied to one or more SUD care continuum performance measures to help ensure quality of care.<sup>xxix</sup> Similarly, Minnesota could leverage its existing requirements for MCOs regarding their participation in state-mandated performance improvement projects (PIPs) to implement a PIP focused specifically on the SUD care continuum, as was recently done in Pennsylvania.<sup>xxx</sup>
- **Maintain commitment to telehealth for SUD services.** A strong infrastructure for telehealth can have a role in Demonstration success by ensuring that the substance use treatment and recovery services can be multimodal and meet beneficiaries' needs.

In addition to the suggestions related to the collection of individual provider data in the PCA and MPA, there were additional measures regarding service delivery of providers participating in the Demonstration that the state can continue to look toward. For example, pending availability of codes in claims data, assessments could be classified into screenings that occurred before a diagnosis of a disorder and are thus considered early intervention versus follow-up assessments after a diagnosis. Similarly, we lack data on the service delivery to MCO enrollees who are treated by Demonstration providers who participate in MCO utilization review processes. DHS may also consider implementing a survey of organizations to capture other data that may inform DHS of treatment quality and adequacy.

# Technical Appendix: Minnesota Provider Survey on the Minnesota 1115(a) Substance Use Disorder System Reform Demonstration Project

## Introduction

Thank you in advance for your time today. This brief survey is part of the evaluation of the Minnesota 1115(a) Substance Use Disorder System Reform Demonstration Project (SUD Demonstration Waiver). The Minnesota Department of Human Services (MN DHS) Behavioral Health Division has contracted with NORC at the University of Chicago to conduct an independent evaluation of Minnesota's SUD Demonstration Waiver. The main goals of the waiver are: 1) Increased rates of identification, initiation, and engagement in treatment for OUD and other SUDs, and 2) Increased adherence to and retention in treatment. This survey is designed to assess your experience delivering services and insights into progress towards the waiver goals. The results of this survey will inform the evaluation's Interim Report as required by the Centers for Medicare & Medicaid Services (CMS). This survey will take approximately 20-30 minutes to complete.

NORC has prepared an Information Sheet on this research study that we would be glad to share with you. To request a copy, please email Juliana Lewis at [lewis-juliana@norc.org](mailto:lewis-juliana@norc.org).

## Organization Location(s)

Before you complete the survey, we would like to confirm some information about your organization. We understand that you may be the contact person for multiple treatment locations operated by your organization and that these locations offer different levels of care for your patients. We want to be sure to accurately report on the experience of your organization and its location(s). Please list the locations for which you are completing this survey and indicate whether your organization operates a residential facility.

## Delivering SUD/OUD Treatment and Recovery Services

1. Based on your experience assessing patients for treatment under the SUD Demonstration Waiver, how effective is the patient assessment process under the waiver in directing patients to the most appropriate level of care?
  - Very effective
  - Effective
  - Neutral
  - Ineffective
  - Very ineffective

2. In the table below, please indicate for each of the ASAM levels of care, your level of agreement with the following statement regarding referrals

a. **Our organization is able to provide access for our patients with Medicaid to this ASAM Level of Care through referral?**

	All of the time	Most of the time	Some of the time	Never
Level 1.0 Outpatient				
Level 2.1 Intensive Outpatient				
Level 3.1 Clinically managed low-intensity residential treatment				
Level 3.3 Clinically Managed High-Intensity and Population-Specific Services				
Level 3.5 Clinically Managed Residential Services				
Level 3.7 Medically Managed Withdrawal Management				

b. For those ASAM Levels of Care that you report you are “some of the time” or “never” able to provide access through referral, please briefly explain your response.

**INSERT TEXT BOX**

3.

a. Please indicate your level of agreement with the following statement. Our organization has the administrative and clinical staff needed to deliver treatment to waiver participants.

- Strongly agree
- Agree
- Disagree
- Strongly Disagree

b. If you answered “Disagree or Strongly Disagree” above, please list the types of staff that your organization needs to hire to be able to achieve your desired capacity.

**Training and Technical Assistance**

4. Which of the following training and technical assistance sessions have organization staff or your providers attended or used? Select all that apply.

- Enhanced professional learning series
- ASAM live session
- Kepro Utilization Trainings

- Virtual Office Hours
- Webinars
- One-on-one meetings
- Submitted a request to the Demonstration Mailbox

5. What additional types of assistance/support would be helpful to you as you continue to move forward with your alignment efforts?

**INSERT TEXT BOX**

### Utilization Management

6. How would you rate the changes the state has made in the requirements around utilization management (UM)?

- Extremely helpful
- Very helpful
- Somewhat helpful
- Not so helpful
- Not at all helpful

7. What challenges or barriers does your organization face in completing utilization management process with Kepro?

8. How much is UM integrated into your standard workflow processes?

- Completely integrated
- Somewhat integrated
- Not at all integrated

### Medication for Opioid Use Disorder (MOUD)

9. Which of the following changes have your organization made to provide treatment by MOUD since the waiver was implemented? Check all that apply

- Added MOUD as a treatment modality through prescribing or referral
- Did not deny patient admission based on MOUD status or need
- Developed the capacity to provide resources to persons with OUD seeking MOUD
- Regularly provide resources to persons seeking MOUD
- Increased the number of providers that prescribe MOUD
- Increased the number of patients for which providers prescribed MOUD
- No organizational changes
- Other (please specify) \_\_\_\_\_

10. a. How does your organization provide patients with Medical Assistance with access to MOUD treatment?

- Our providers prescribe MOUD
- We refer patients to licensed providers or pharmacists
- Both
- Neither

b. If you answered “Neither,” please explain

11. Has your organization made any changes in the treatment of patients with MOUD since waiver implementation?
- Yes
  - No

If yes, please describe

12. For MOUD, approximately how many patients have you prescribed or referred patients for MOUD for during the last year?

Number of patients with Medicaid	Prescription	Referrals
<50		
51-100		
101-250		
251-499		
≥500		

13. Which, if any, of the following challenges has your organization encountered when providing medication for opioid use disorder to waiver patients? Check all that apply.

- Lack of providers who can prescribe MOUD
- Lack of eligible patients
- Eligible patients cannot afford it
- Lack of other mental health services to complement medication use
- Lack of supervision, mentorship, specialist backups, or peer consultation
- Lack of capacity to manage opioid use disorder patients
- Compliance with Drug Enforcement Administration instructions
- Concern about medication diversion or misuse
- Other: please specify \_\_\_\_\_
- No challenges [DISALLOW IF ANOTHER OPTION SELECTED]

14. How has your organization and your providers’ use of Minnesota Prescription Monitoring Program changed since enrolling as a SUD waiver provider?

- Increased
- Stayed about the same
- Decreased

**Working with Minnesota Managed Care Organizations**

15. When the Demonstration’s Mid-point Assessment was conducted, providers reported that coordination with Minnesota Managed Care Organizations (MCOs), i.e., health plans, was just

beginning. Today, which of the following statements describes current activities to coordinate care for MCO members under the Demonstration. Check all that apply.

- We communicate regularly at the organizational level with MCOs regarding patient referrals, assessment, and care coordination
- Our case managers communicate regularly with MCO case management or utilization management staff regarding authorization and treatment of members
- We report/exchange data on assessment and treatment to MCOs for their members
- We file claims with MCOs for reimbursement
- We are receiving reimbursement from MCOs for the treatment of their members who are waiver eligible
- Other, please describe

**Future Activity under the SUD Demonstration Waiver**

16. How has the waiver affected the stability or sustainability of your organization? Are there any other additional organizational changes you plan to make?

17. Based on your experience as an enrolled provider, how effective is the waiver in promoting more patient-centered care for SUD/ODU treatment in Minnesota?

- Very effective
- Effective
- Neutral
- Ineffective
- Very ineffective

18. Based on your experience as an enrolled provider, how effective is the waiver in facilitating transitions to different levels of care for SUD/ODU treatment in Minnesota?

- Very effective
- Effective
- Neutral
- Ineffective
- Very ineffective

19. Please add any additional comments you would like to share about your experience with the SUD Demonstration Waiver

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