

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



State Demonstrations Group

November 30, 2020

Allison Taylor
Medicaid Director
Indiana Family and Social Services Administration
402W. Washington Street, Room W461, MS25
Indianapolis, IN 46204

Dear Ms. Taylor:

The Centers for Medicare & Medicaid Services (CMS) has approved the evaluation design for Indiana's section 1115(a) demonstration entitled, "Healthy Indiana Plan (HIP)," (Project No. 11-W-00296/5) for the demonstration approval period from February 1, 2018 through December 31, 2020. We sincerely appreciate the state's commitment to a rigorous evaluation of your demonstration.

CMS has added the approved evaluation design to the demonstration's Special Terms and Conditions (STC) as Attachment C. A copy of the STCs, which includes the new attachment, is enclosed with this letter. The approved evaluation design may now be posted to the state's Medicaid website within thirty days, per 42 CFR 431.424(c). CMS will also post the approved evaluation design as a standalone document, separate from the STCs, on Medicaid.gov.

Please note that CMS has received an interim evaluation report for this demonstration. In addition, a draft of the summative evaluation report, consistent with this approved design, is due to CMS by June 30, 2022—that is, 18 months after the end of the demonstration approval period on December 31, 2020.

We look forward to our continued partnership with you and your staff on the HIP demonstration. If you have any questions, please contact your CMS project officer, Ms. Rachel Nichols, at Rachel.Nichols@cms.hhs.gov.

Sincerely,

**Danielle
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Danielle Daly
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Andrea J. Casart
Director
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Demonstrations

cc: Mai Le-Yuen, State Monitoring Lead, Medicaid and CHIP Operations Group



Healthy Indiana Plan Evaluation Plan

Final for CMS Review

HEALTH CARE AND HUMAN SERVICES POLICY, RESEARCH, AND ANALYTICS—WITH REAL-WORLD PERSPECTIVE.



Prepared for: **Indiana Family and Social Services Administration**

Submitted by: **The Lewin Group, Inc.**

September 17, 2020

Healthy Indiana Plan Evaluation Plan

Final for CMS Review

Prepared for: Indiana Family and Social Services Administration

Submitted by: The Lewin Group, Inc.

September 17, 2020

Note: This Evaluation Plan includes adjustments to reflect the State's decision (effective April 30, 2020) to indefinitely stop all Gateway to Work activities, Indiana's community engagement program, in response to the COVID-19 public health emergency and the stay in the federal lawsuit involving Indiana Medicaid.

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A. General Background Information

The Centers for Medicare & Medicaid Services (CMS) renewed the Indiana Family and Social Services Administration's (FSSA) Healthy Indiana Plan (HIP) Section 1115(a) demonstration waiver for three years from February 1, 2018 through December 31, 2020. First passed by the Indiana General Assembly in 2007, and implemented in 2008, HIP represents the nation's first consumer-driven health plan for Medicaid beneficiaries, and in 2015, became an alternative to traditional Medicaid expansion under the Patient Protection and Affordable Care Act.

Through the Section 1115(a) demonstrations and waiver authorities in the Social Security Act, states can test and evaluate innovative solutions to improve quality, accessibility, and health outcomes in a budget-neutral manner. Indiana's approved 1115 waiver Specific Terms and Conditions (STCs) to implement HIP require an evaluation of this program's ability to meet its intended goals. This Evaluation Plan will guide the federally-required independent evaluation of this program, and is organized as follows:

- Section A: General Background Information
- Section B: Evaluation Questions and Hypotheses
- Section C: Methodology
- Section D: Methodological Limitations
- Section E: Attachments
 - Attachment E.1: Summary of Independent Evaluator Approach
 - Attachment E.2: Evaluation Budget
 - Attachment E.3: Timeline and Major Milestones
 - Attachment E.4: Variable Descriptions for Federal Survey Data to be Used in this Evaluation
- Section F: Analytic Plans by Goal

In addition to the demonstration's STCs, this Evaluation Plan reflects, as feasible and appropriate, CMS Evaluation Plan feedback received in February 2019, the CMS evaluation guidance released in March 2019,¹ CMS Evaluation Plan feedback received in June 2019, CMS Evaluation Plan feedback received in March 2020, and additional feedback received during calls with CMS and the State. With regard to CMS' evaluation guidance, this plan addresses the general guidance, and the appendix on sustainability. Due to state-specific requirements outlined in the STCs, this plan addresses the appendices on non-eligibility periods, premiums or account payments, and retroactivity as feasible and appropriate in the context of the demonstration. Since the State removed the suspension of enrollment for HIP members that do not comply with community engagement reporting requirements (effective April 30, 2020) after the submission of the Interim Evaluation Report, this plan addresses the appendix on community engagement but community engagement will no longer be evaluated for the Summative Evaluation Report.

¹ CMS. 1115 Demonstration State Monitoring & Evaluation Resources. Released and Accessed March 13, 2019 at <https://www.medicaid.gov/medicaid/section-1115-demo/evaluation-reports/evaluation-designs-and-reports/index.html>

1. Demonstration Goals

Building on the successes and lessons learned from Original HIP implemented in 2008 and HIP 2.0 implemented in 2015, the State used the 2018 HIP waiver renewal to test new approaches and flexibilities in Indiana’s Medicaid program to provide incentives for members to take personal responsibility for their health. Over the current demonstration period (February 2018 through December 2020), the State seeks to achieve several demonstration goals (**Exhibit A.1**). These goals inform the State’s evaluation of the HIP program, and include, but are not limited to, the following:

1. Improve health care access, appropriate utilization, and health outcomes among HIP members.
2. Increase community engagement leading to sustainable employment and improved health outcomes among HIP members (suspended indefinitely effective April 30, 2020).²
3. Discourage tobacco use among HIP members through a premium surcharge and the utilization of tobacco cessation benefits.
4. Promote member understanding and increase compliance with payment requirements by changing the monthly POWER Account payment requirement to a tiered structure.
5. Ensure HIP program policies align with commercial policies, encourage members understanding, and promote positive member experience and minimize gaps in coverage.
6. Assess the costs to implement and operate HIP and other non-cost outcomes for the demonstration.

<p>Exhibit A.1: Indiana 1115(a) Demonstration</p> <p>Name of Demonstration: Healthy Indiana Plan</p> <p>Approval Date of Demonstration: February 1, 2018</p> <p>Demonstration Renewal Period: February 1, 2018 - December 31, 2020</p>
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The above goals address key objectives of Section 1115(a) demonstrations, including improving access to high-quality services that produce positive health outcomes for individuals; strengthening beneficiary engagement in their personal health care plan, including incentive structures that promote responsible decision-making; and enhancing alignment between Medicaid policies and commercial health insurance products to facilitate smoother beneficiary transition.³

² FSSA/the State indefinitely stopped all Gateway to Work activities, Indiana’s community engagement program, in response to the COVID-19 public health emergency and the stay in the federal lawsuit involving Indiana Medicaid.

³ CMS. About Section 1115 Demonstration Waivers. Accessed March 29, 2018 at <https://www.medicaid.gov/medicaid/section-1115-demo/about-1115/index.html>

2. Description of the Demonstration and Implementation Plan

First passed by the Indiana General Assembly in 2007, HIP provides Medicaid health-insurance coverage for qualified low-income, non-disabled adults ages 19 to 64. HIP offers its members a high deductible health plan paired with a Personal Wellness and Responsibility (POWER) Account, which operates similarly to a health savings account.

The current HIP 1115 waiver renewal, approved in February 2018, continues most components of HIP 2.0 (**Exhibit A.2**) and adds some new provisions. Changes for HIP, summarized from the State's amended waiver application, include:⁴

- Adding a tobacco use surcharge by increasing users' POWER Account Contributions by 50% beginning in their second year of continuous enrollment
- Expanding the Gateway to Work program by adding a community engagement reporting requirement for non-disabled working-age members beginning in 2019 (suspended indefinitely effective April 30, 2020)⁵
- Changing Personal Wellness and Responsibility (POWER) Account Contributions to a tiered structure instead of a flat 2% of income
- Adding a new HIP Plus chiropractic benefit
- Facilitating enrollment in HIP Maternity (MA) coverage for pregnant women
- Enhancing the managed care entity (MCE) member incentive program by increasing available healthy incentives to a maximum of \$200 per initiative
- Reestablishing an open enrollment period
- Waiving the "institution for mental disease" payment exclusion for short-term substance use disorder (SUD) treatment services for all Medicaid adults ages 21 to 64 (Note: this provision will be the subject of a separate evaluation)
- Discontinuing the graduated copayments for non-emergency use of the emergency department (ED) and the HIP Link premium assistance program for those with employer-sponsored insurance

Exhibit A.2: Program History

2007: HIP passed in the Indiana General Assembly.

2008: With CMS approval, HIP began enrolling working-age, uninsured adults in coverage.

2011: State legislature passed Senate Enrolled Act 461 that called on HIP to be the program used for the eventual expansion of Medicaid through the Patient Protection and Affordable Care Act.

2014: State requested permission from CMS to expand its existing demonstration waiver via HIP 2.0.

2015: CMS approved HIP 2.0, which included Indiana's Medicaid expansion, through a three-year waiver renewal expiring January 2018.

2017: State requested permission from CMS to expand its existing demonstration waiver via HIP.

2018: CMS approved the current HIP through a three-year waiver renewal expiring December 2020.

⁴ Indiana Family and Social Services Administration. (2018). HIP Waiver Application. Retrieved from https://www.in.gov/fssa/hip/files/IN-HIP-1115-Approval-Package_2-1-2018.pdf

⁵ FSSA/the State indefinitely stopped all Gateway to Work activities, Indiana's community engagement program, in response to the COVID-19 public health emergency and the stay in the federal lawsuit involving Indiana Medicaid.

Indiana 1115(a) Demonstration Evaluation Plan

A. General Background Information

Healthy Indiana Plan

In 2015, HIP's target population changed to all non-disabled, low-income adults between 19 and 64 years old with household income at or below 138% of the FPL. HIP covers the adult group, low-income parents and caretakers, Transitional Medical Assistance (TMA), and pregnant women. HIP offers distinct benefit packages to its eligible members: HIP Plus, HIP Basic, HIP State Plan Plus, HIP State Plan Basic, HIP Maternity, and HIP Plus Copay. The State uses a managed care delivery system for HIP. Four MCEs, contracted under HIP at the time of this Evaluation Plan, provide health care coverage to HIP members.

HIP Benefit Plans

Indiana's current section 1115(a) demonstration provides authority for the State to continue to offer HIP with different benefit plans—HIP Plus and HIP Basic:

- **HIP Plus:** HIP members with income at or below 138% of the federal poverty level (FPL) who make required POWER Account Contributions maintain access to HIP Plus, an enhanced benefit plan, which includes additional health care benefits such as coverage for dental, vision, and chiropractic services.⁶ HIP Plus members pay a monthly POWER Account Contribution based on income tiers but do not pay copayments for health care services.
- **HIP Basic:** HIP members with income at or below 100% of the FPL who do not make monthly POWER Account Contributions for HIP Plus coverage enroll in HIP Basic. This benefit plan provides more limited coverage than HIP Plus (i.e., not covering vision or dental services) and includes copayments for doctor visits, hospital stays, non-emergency ED visits, and prescriptions.⁷ These payments are consistent with traditional Medicaid copayments, and can range from \$4 to \$8 per doctor visit or prescription filled and can be as high as \$75 per hospital stay. Pregnant members have no cost sharing and there is a 5% of income quarterly cost sharing limit for all members. HIP Basic members can enroll in HIP Plus during their annual redetermination if they choose to begin paying their POWER Account Contribution.
- **HIP State Plan Plus:** Members have the same cost-sharing requirements as HIP Plus and do not pay copayments for services. State Plan Plus members, similarly to regular HIP Plus members, make POWER Account Contributions. Enrollment in this plan provides certain members⁸ with access to the Medicaid State Plan benefits in place of the approved Alternative Benefit Plan.
- **HIP State Plan Basic:** Members have the same cost-sharing requirements and copayments for services as HIP Basic. Enrollment in this plan provides certain members⁹ with access to the Medicaid State Plan benefits in place of the approved Alternative Benefit Plan.

⁶ On June 10, 2015, the State submitted an approved copy of the Alternative Benefit Package (ABP) for HIP Plus as a State Plan Amendment to the Centers for Medicare and Medicaid Services. These benefits for the ABP were aligned using Essential Health Benefits. Indiana Family and Social Services Administration. (2014). Alternative Benefit Plan: Healthy Indiana Plan (HIP) 2.0 Plus. Retrieved from <https://www.in.gov/fssa/hip/files/DraftPlusABP.pdf>

⁷ On June 10, 2015, the State submitted an approved copy of the Alternative Benefit Package (ABP) for HIP Basic as a State Plan Amendment to the Centers for Medicare and Medicaid Services. These benefits for the ABP were aligned using Essential Health Benefits. Indiana Family and Social Services Administration. (2014). Alternative Benefit Plan: Healthy Indiana Plan (HIP) 2.0 Basic. Retrieved from <https://www.in.gov/fssa/hip/files/DraftBasicABP.pdf>

⁸ Medically frail, TMA participants, Section 1931 low-income (< 19% of the FPL) parents and caretakers, and low-income (< 19% of the FPL) 19 – 20 year olds.

⁹ Medically frail, TMA participants, Section 1931 low-income (< 19% of the FPL) parents and caretakers, and low-income (< 19% of the FPL) 19 – 20 year olds.

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- **HIP Maternity:** HIP members who become pregnant while enrolled in a HIP plan transition to HIP Maternity (MA). HIP Maternity covers HIP members throughout their pregnancy and 60 days postpartum. HIP Maternity enrollees do not have cost-sharing requirements and have access to the Medicaid State Plan benefits.
- **HIP Plus Copay:** HIP members above 100% of the FPL identified as medically frail¹⁰ by the State or an MCE and have not been able to meet their HIP Plus POWER Account Contribution obligations. These members have copayments assigned to them, consistent with the HIP Basic Plan and have access to HIP Plus benefits.

Members can switch between benefit plans as policies allow. Adults that meet all the eligibility requirements for HIP, but who are not a U.S. citizen and not a lawful permanent resident in the U.S. for at least five years or are not qualified aliens, are entitled to “emergency services only” under HIP. Lewin did not include this enrollment category in this evaluation due to the limited nature of covered services.

Eligibility Determination Process

Individuals apply for HIP services through the Division of Family Resources, which determines eligibility for Indiana Health Coverage Programs. Members can also complete a presumptive eligibility application with qualified providers to receive temporary health coverage.

To start coverage, HIP members must wait 60 days or make an initial Fast Track payment to their POWER Account. Individuals with income greater than 100% FPL must make a payment within 60 days to obtain coverage. New HIP members in the waiting period who have not made a Fast Track payment are determined conditionally eligible by the Division of Family Resources. Conditionally eligible members do not receive full eligibility and cannot enroll as members until one of the following occurs within the 60-day payment period:

- Enrollee makes a payment of their first POWER Account Contribution for HIP Plus
- Enrollee makes a Fast Track \$10 prepayment for HIP Plus
- Enrollee at or below 100% of the FPL does not make a first payment before the 60-day payment period expires and, therefore, enrolls in HIP Basic

Members have the opportunity to select an MCE on their application. However, if an individual determined to be conditionally eligible for HIP by the Division of Family Resources does not select an MCE, the State auto-assigns the member to an MCE. Member eligibility is effective the first day of the month; coverage end dates fall on the last day of a month unless a member dies.

Presumptive Eligibility

With HIP 2.0, the State introduced a Fast Track prepayment option for POWER Account Contributions and enhancements to the presumptive eligibility (PE) process. The PE process allows qualified providers to determine eligibility for certain groups to receive temporary health coverage under the Indiana Health

¹⁰ Medically frail refers to a federally required designation of members who have disabling mental disorders, including serious mental illness; chronic substance use disorders; serious or complex medical conditions; physical, intellectual or developmental disabilities that significantly impair the ability to perform one or more activities of daily living; or a disability determination based on Social Security Administration criteria. These members have a medically frail flag of Y in the monthly enrollment data.

Indiana 1115(a) Demonstration Evaluation Plan

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Coverage Programs, which includes HIP. As of April 1, 2015, the State expanded qualified PE providers to include Federally Qualified Health Centers (FQHCs), Rural Health Centers (RHCs), Community Mental Health Centers, and local County Health Departments. Qualified providers work with individuals to complete a PE application. Using an online system and member self-reported responses, qualified providers receive real-time PE determinations for individuals seeking health care services. An individual can receive PE coverage only once during a 12-month rolling period, and only once per pregnancy.¹¹

Individuals determined presumptively eligible can receive temporary coverage and receive services immediately until the end of the following month. Members must complete the full application by the last day of the next month to maintain PE coverage. Before January 1, 2019, members determined presumptively eligible received coverage under the managed care delivery system. State applicants determined presumptively eligible for the adult category (PE Adult) before 2019 enrolled with a MCE and received coverage similar to HIP Basic with copayment obligations. As of January 1, 2019, applicants determined presumptively eligible receive coverage under a fee-for-service delivery system.¹²

Starting in 2018, PE members determined to be conditionally eligible for HIP move directly to HIP Basic with an opportunity to pay for HIP Plus. The State refers to this population as “Potential Plus.” This extension allows members to avoid a gap in coverage as long as they meet the required application and payment deadlines. Applicants have 60 days to pay any required POWER Account Contribution to be eligible for HIP Plus.¹³

Fast Track

The Fast Track option expedites HIP enrollment by allowing applicants to make a prepayment of \$10 towards their POWER Account Contribution. Using Fast Track, applicants can pay a POWER Account Contribution at the time of application or any time before the State’s eligibility determination. Once the State determines an applicant eligible for Medicaid, the individual’s Medicaid eligibility dates back to the first day of the month in which the member made the Fast Track payment. Individuals approved for HIP with income less than 100% of the FPL who do not make a POWER Account Contribution within the 60 days enroll in HIP Basic. Individuals with income over 100% of the FPL who do not make a POWER Account payment or Fast Track pre-payment in the required 60-day period do not receive coverage and must reapply.¹⁴

POWER Accounts

To help members prepare for participation in the commercial marketplace, the State offers all HIP members a POWER Account, similar to a health savings account. POWER Accounts provide incentives for members to stay healthy, be value and cost conscious, and use services in a cost-efficient manner. HIP Plus, HIP Basic, or HIP State Plan members use their POWER Accounts to pay for covered services up to their \$2,500 deductible. MCEs establish and administer each member’s POWER Account and pay the claims for all covered services when a member exhausts their POWER Account.

¹¹ Indiana Health Coverage Programs. (2019). Presumptive Eligibility Provider Reference Model. Retrieved from <https://www.in.gov/medicaid/files/presumptive%20eligibility.pdf>

¹² Ibid.

¹³ Ibid.

¹⁴ Indiana Family & Social Services Administration. (2019). MCE Reporting Manual HIP 2.0, Office of Medicaid Policy and Planning Version 4.0.

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A. General Background Information

POWER Account Contributions

While all members have a POWER Account, HIP Plus members have a POWER Account Contribution. The State funds POWER Accounts up to a ceiling of \$2,500 per year, contributing an amount annually for each member that is equal to the difference between the required member contribution and the \$2,500 ceiling. For HIP Plus members, this monthly amount represents a combination of member, employer or not-for-profit, and State contributions. Members may also apply earned MCE incentives as offered by their plan. For HIP Basic members, the State fully funds the POWER Accounts and covers the member's \$2,500 annual deductible. All HIP members pay \$8 for a non-emergency ED visit.

MCEs bill for and collect HIP Plus POWER Account Contributions and send monthly statements to members. HIP Basic members also receive monthly account statements to assist them in managing the POWER Account and copayments and to increase awareness of the cost of the health care services received.

Determination of POWER Account Contribution Amounts

Effective with CMS' waiver approval in 2018, the State changed the determination of member POWER Account Contribution amounts from 2% of income to a tiered structure based on income level (**Exhibit A.3**). The previous monthly POWER Account Contribution amounts ranged from a maximum amount of \$4.28 for members with incomes less than 22% of the FPL to a maximum amount of \$27.17 for those at 100% of the FPL or higher. Fluctuations in a member's income required a recalculation of the member's 2% of income and changed the monthly amount due. This change could happen as frequently as every month for members with monthly income fluctuations. This ongoing variability of the POWER Account Contribution amounts created confusion among members regarding the amount owed and increased the overall administrative burden for the State and MCEs related to Power Account Contributions.

The new tiered monthly contribution amounts range from \$1.00 for members with income less than 22% of the FPL to \$20.00 for those at 100% of the FPL or higher. The State anticipates that moving to this simplified tiered structure will result in greater member understanding, increased member compliance with payments, and will minimize gaps in coverage.

The State calculates the household's POWER Account Contribution based on a tiered contribution structure for individuals. For two HIP-eligible married adults, the State divides the monthly contribution, and each member pays half of the calculated amount on a monthly basis. Married members with household income less than 22% both pay a \$1 POWER Account Contribution. Other income tiers split the amount; for example, two married adults with household income of 51% to 75% FPL each pay \$5.00. Beginning in January 2019, members may pay a 50% tobacco use surcharge in addition to the POWER Account tier amounts.

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A. General Background Information

Exhibit A.3: Comparison of HIP Plus Previous and Current POWER Account Contribution Amounts for Single Members (2015 and 2018)

FPL	HIP 2.0 POWER Account Contribution (Previous) ^a		HIP POWER Account Contribution (Current) ^b		
	2015 Monthly Income, Single Individual	Maximum Monthly POWER Account Contribution, Single Individual	2018 Monthly Income, Single Individual	Monthly POWER Account Contribution, Single Individual	Tobacco Use Surcharge
<22%	Less than \$214	\$4.28	Less than \$222	\$1.00	\$1.50
23-50%	\$214.01 to \$487	\$9.74	\$222.01 to \$505	\$5.00	\$7.50
51-75%	\$487.01 to \$730	\$14.60	\$505.01 to \$758	\$10.00	\$15.00
76-100%	\$730.01 to \$973	\$19.46	\$758.01 to \$1,011	\$15.00	\$22.50
101-138%	\$973.01 to \$1,358	\$27.17	\$1,011.01 to \$1,396	\$20.00	\$30.00

^a FSSA. HIP 2.0 Introduction, Plan options, Cost sharing, and Benefits. Accessed May 6, 2019 at

https://www.in.gov/idoi/files/HIP_2_0_Training_-_Introduction_Plans_Cost-Sharing_Benefits_-_1_21_15.pdf

^b FSSA. POWER Accounts. Accessed May 6, 2019 at <https://www.in.gov/fssa/hip/2590.htm>

Note: For HIP 2.0, the monthly income amounts shown here reflect 2015 FPL and the monthly POWER Account Contribution amounts represent a percentage of income. For current HIP, the POWER Account Contribution amounts reflect the tiered contribution structure.

Loss of Coverage Due to Non-Payment of POWER Account Contributions

HIP Plus members with incomes from 101% to 138% of the FPL that do not make monthly POWER Account Contribution payments are disenrolled from HIP and are not allowed to re-enroll for six months (also referred to as the six-month lockout or non-eligibility period). The State exempts members determined medically frail from non-payment penalties regardless of income; these members do not lose benefits due to non-payment of POWER Account Contributions. The enrollment lockout period also does not apply for members residing in a domestic violence shelter or in a state-declared disaster area. Members subject to a lockout period can request a waiver to reenter the program.

Tobacco Cessation Initiative

As indicated previously, all HIP members must contribute to their POWER Account to maintain access to the enhanced HIP Plus benefit plan. To discourage tobacco use and to align with commercial market coverage policies, HIP includes a surcharge on top of the POWER Account Contribution for HIP Plus members who self-identify as tobacco users.¹⁵ Tobacco use means the use of tobacco four or more times a week in the last six months, including use of chewing tobacco, cigarettes, electronic cigarettes (including vaping), cigars, pipes, hookah, and snuff. The HIP tobacco initiative began in January 2018, with surcharges taking effect in January 2019.

The State assesses a surcharge on top of the POWER Account Contribution for members who continuously enroll for 12 months with the same MCE and self-identify as tobacco users during this period. If the member continues to self-identify as using tobacco, the State increases their monthly contributions by 50% beginning in the first month of their new benefit period. For example, the POWER Account Contribution for an individual with income less than 22% of the FPL would increase from \$1.00

¹⁵ Members may self-identify as tobacco users during their initial application, during MCE selection, or when a member notifies their MCE.

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to \$1.50 per month with the application of the tobacco surcharge. For married HIP members, only the tobacco user receives the tobacco surcharge.

MCEs separate the surcharge on the monthly POWER Account statements to highlight the additional cost due to tobacco use for members. Some MCEs offer members MCE-specific incentives to participate in tobacco cessation services. Two of these tobacco cessation services include:

- **Indiana Tobacco Quitline:** Free phone-based counseling service administered by the State. Users can access services every day of the week in over 170 languages. The Quitline includes access to one-on-one coaching, resources for health care providers, and tools for other stakeholders to use for smoke-free and other smoking cessation programming.¹⁶
- **Baby and Me Tobacco Free:** Smoking cessation program for pregnant and postpartum women (up until 12 months postpartum). This program includes individualized education sessions, biochemical testing at visits, and several diaper vouchers.¹⁷

The State collects information on HIP member tobacco use during the HIP enrollment process (i.e., initial enrollment and when changing plans during open enrollment); members can also report changes in their tobacco use by calling their MCE or the State. While there are questions about tobacco use on the health needs assessment performed by the MCEs, these responses are not used to determine the tobacco surcharge due to concerns about members underreporting tobacco use during an assessment performed for clinical purposes. When a member changes MCEs during the MCE selection period or the middle of the year, the tobacco indicator passes to the new MCE. However, the surcharge is based on 12 months of full eligibility and tracking of tobacco use, so the new MCE will not know the member's previous tobacco use indicator or be expected to apply a surcharge.

Preventive Service Incentive and Rollover

The State provides all HIP members with incentives to receive preventive services and to manage their POWER Accounts via direct financial investment. Members have an opportunity to rollover any funds remaining in their POWER Account and apply the rollover as a credit toward their POWER Account Contribution in the next benefit period. For members that contribute to a POWER Account and use services, claims are paid from the account proportionally from State and member funds. If the member contributes \$240 over the year out of the \$2,500 limit, then 9.6% of every claim paid by the account is paid with member dollars; the rest is covered with State dollars. If the entire account is not spent, then the member's remaining dollars can be rolled over to the next year or refunded if the member leaves the program.

The amount rolled over or discounted depends on whether the member received preventive care services and what program the member enrolled in on the last day of the benefit period:

- If HIP Plus members have funds remaining at year-end and received preventive services, the State matches the member rollover amount and provides extra funds to their POWER Account. These funds further reduce the amount owed for the current benefit period, but only after members use rollover funds.

¹⁶ Indiana.gov Quitline. (2019). Indiana's Tobacco Quitline. Retrieved from <https://www.in.gov/quitline/>

¹⁷ Indiana State Department of Health: Maternal and Child Health Epidemiology Division. (2016). Infant Mortality: Year in Review. Retrieved from <https://www.in.gov/fssa/files/Medicaid%20Advisory%20Board%208.16.pdf>

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A. General Background Information

- If HIP Basic members receive preventive services, they can offset the required contribution for HIP Plus by up to 50% the following year. However, members may not double their rollover as in HIP Plus. Members who choose to remain in HIP Basic will incur a penalty on any unused member rollover funds. HIP Basic members who do not receive preventive services will not earn the rollover discount. Members who choose to remain in HIP Basic will incur a penalty on any unused member rollover funds.

Exhibits A.4 and A.5 illustrate the rollover for HIP Plus and HIP Basic.

Exhibit A.4: HIP Rollover for HIP Plus Members

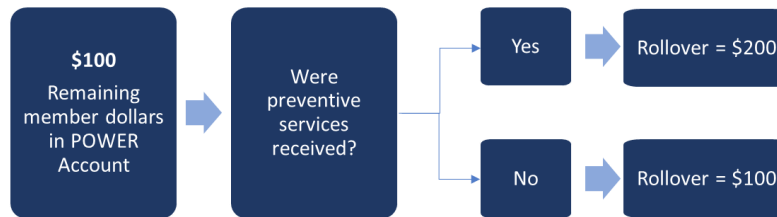
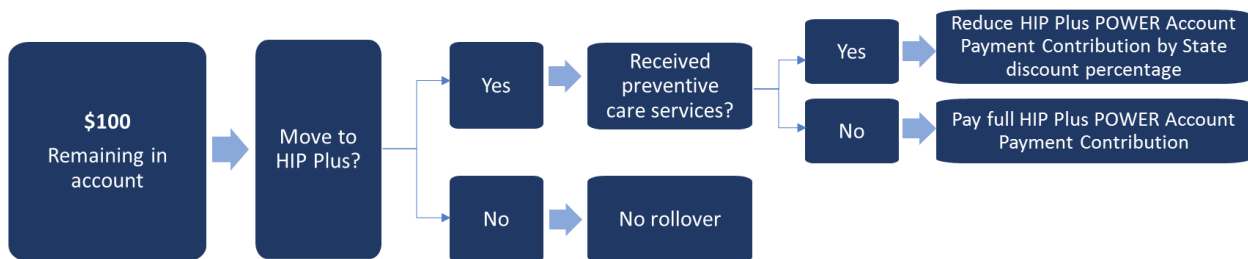


Exhibit A.5: HIP Rollover for HIP Basic Members



The MCEs calculate the rollover 121 calendar days after the end of the benefit period to allow for a claims run-out period. The MCEs then submit this information to the State. For member rollover, members can reuse these funds to reduce the amount owed for their current benefit period. HIP members who leave the program remain eligible to receive a refund for the unused portion of their contributions and rollover following the reconciliation of their POWER Account. State rollover funds never pay tobacco surcharge amounts, and unused funds return to the State at the end of the current benefit period.

Employment, Education, and Gateway to Work Policy (Effective 2019 to April 30, 2020)

Indiana's community engagement reporting requirement went into effect in 2019 with a six-month voluntary reporting period. This policy evolved from Indiana's existing HIP 2.0 voluntary Gateway to Work program and was designed to provide an incentive for HIP members to attain employment or engage in other community activities correlated with improved health and wellness (e.g., employment, volunteer work, education, and training). Under this new policy, all able-bodied HIP participants, not otherwise meeting an exemption or already working at least 20 hours per week, were required to engage in and report on qualifying activities monthly. Effective October 31, 2019, the State no longer required members to report their hours. Effective April 30, 2020, the State indefinitely stopped all community engagement activities in response to the COVID-19 public health emergency and the stay in the federal lawsuit involving Indiana Medicaid. Information on this program is provided here since the

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policy was evaluated for the Interim Evaluation Report according to the draft Evaluation Plan dated December 18, 2019 (submitted to CMS on December 19, 2019). Since the policy is no longer in effect, it will not be evaluated for the Summative Evaluation Report.

The Gateway to Work program provided three possible reporting statuses for members, reflecting that some members may already work a substantial amount, and others may encounter circumstances that create significant barriers to participation. **Exhibit A.6** provides a summary of each status.

Exhibit A.6: Gateway to Work Reporting Status Definitions

Reporting Status	Definition
Exempt	Member has an exemption from reporting requirements and does not have to report qualifying activities during exemption months. The member still has the option of using Gateway to Work resources.
Reporting Met (i.e., pre-qualified)	Member already works at least 20 hours per week. The member can still use Gateway to Work resources.
Required to Report (i.e., non-exempt)	Member needs to report qualifying activities for a certain number of hours each month (e.g., FSSA Benefits portal or by calling the MCE). Note: January to June 2019 reporting is on a voluntary basis only.

Exhibit A.7 provides a summary of qualifying activities and exempt populations. The list of possible exemptions included a “good cause” exemption (not specific to any one circumstance or condition), which members were able to report to their MCE for further review by the State. The good cause exemption applied to individuals who did not fit into the other designated exemption categories that may affected their ability to meet reporting hours (e.g., restrictions due to religious affiliations or having a degenerative disease that does not yet meet the medically frail definition).

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Exhibit A.7: Gateway to Work Qualifying Activities and Exempt Populations

Gateway to Work Qualifying Activities	Exempt Populations
<p>Employment</p> <ul style="list-style-type: none"> • Employment (subsidized or unsubsidized) • Health plan employment programs • Job search activities • Education related to employment (on-the-job training) • Caregiving • Homeschooling • Members of the Pokagon Band of Potawatomi participating in the Pathways program <p>Education</p> <ul style="list-style-type: none"> • General Education: <ul style="list-style-type: none"> ○ High School Equivalency ○ Adult education ○ Post-secondary education • Job skills training (e.g., Next Level Jobs) • Vocation education or training • English as a second language education <p>Community Service</p> <ul style="list-style-type: none"> • Community service/public service • Volunteer work • Gateway to Work community work experience <p>Other</p> <ul style="list-style-type: none"> • Qualifying activities based on State or MCE review • MCE Qualifying Activities (MCE-specific programs) • Attending Alcoholic Anonymous or Narcotics Anonymous meetings • Completing pre-suspension courses 	<ul style="list-style-type: none"> • Age 60 years or older • Temporary Assistance for Needy Families (TANF)/ Supplemental Nutrition Assistance Program (SNAP) recipients • Medically frail • Pregnant women • Homeless individuals • Recently Incarcerated (up to 6 months from release) • Certified illness or incapacity (temporary) • SUD treatment • Student (full or half time) • Primary caregiver: <ul style="list-style-type: none"> ○ Dependent child below the compulsory age (seven and under prior to October 1, 2019; changed to under 13 years of age effective October 1, 2019) ○ Disabled dependent ○ Kinship caregiver of abused or neglected children • Good cause exemption (e.g., hospitalization, domestic violence, or the death of a family member)

The State began to phase-in the reporting requirements in 2019 with a member grace period of six months of voluntary reporting only to allow for operational readiness and promote member awareness. Members required to report qualifying activities had to start reporting a minimum of five hours per week beginning on July 1, 2019, increasing over time to 20 hours per week by July 1, 2020. **Exhibit A.8** outlines this phase-in period.

Exhibit A.8: Gateway to Work Phase In Hours

HIP Eligibility Period	Required Participation Hour Reporting
January 2019 – June 2019	0 hours per week
July 2019 – September 2019	5 hours per week
October 2019 – December 2019	10 hours per week
January 2020 – June 2020	15 hours per week
July 2020 – Ongoing	20 hours per week

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The State had planned to assess member compliance with the Gateway to Work reporting requirement in December of each year; at least eight months of compliance during a calendar year (CY) would have resulted in continued enrollment. Effective October 31, 2019, the State temporarily removed the enrollment suspension for members who do not meet their reporting requirements pending the result of the federal lawsuit. Effective April 30, 2020, the State indefinitely stopped all community engagement activities and members no longer need to report Gateway to Work qualifying activities. However, MCEs will continue to refer members to job training and placement programs including but not limited to, Next Level Jobs and WorkOne.

3. Population Groups Impacted by the Demonstration

Indiana will evaluate whether the HIP demonstration has the intended effects on the target population. HIP includes low-income, non-disabled adults ages 19 to 64. The other adults eligible for Medicaid in Indiana include individuals who are 65 and older, blind, or disabled and who are not eligible for Medicare. The other eligible adults in the State are low-income adults who can receive home and community-based services or who are in nursing homes and other facilities.

B. Evaluation Questions and Hypotheses

The evaluation will focus on the demonstration policy goals described in **Section A**. This section provides the hypotheses and research questions (RQ) that correspond to each of the goals. Logic models are provided for Goals 2, 3, and 4, which are focused on evaluating the impact of a specific policy change. Logic models are not provided for Goals 1, 5, and 6, which are descriptive in nature.

1. Goal One - Improve health care access, appropriate utilization, and health outcomes among HIP members

The evaluation determines whether the HIP policies have the intended effects on members, including improving health care access, appropriate utilization, and health outcomes. **Exhibit B.1** below lists the hypotheses and research questions corresponding to this goal.

Exhibit B.1: Hypotheses and Research Questions for Goal 1

Hypotheses	Research Questions
Hypothesis 1 – Member use of preventive care, primary care, needed prescription drugs, chronic disease management care, and urgent care will be stable during the HIP demonstration period.	Primary research question 1.1: How has the following changed over time for HIP members? <ul style="list-style-type: none"> • Preventive, primary, urgent and specialty care • Prescription drug use • Chronic care management
Hypothesis 2 – Unnecessary emergency department services will not rise over time for HIP members.	Primary research question 2.1 – How have avoidable emergency department visits among HIP members changed over time?
Hypothesis 3 – HIP members will report positive health outcomes.	Primary research question 3.1: How has reported health status for HIP members changed over time?
Hypothesis 4 – HIP members will report satisfaction with health care access.	Primary research question 4.1: What percentage of HIP members report getting health care as soon as needed? Primary research question 4.2 – To what extent do HIP members receive coverage through Fast Track and presumptive eligibility policies?
Hypothesis 5 – The Indiana Medicaid enrollment rate will be comparable to other Medicaid expansion states.	Primary research question 5.1: How does the Indiana Medicaid coverage rate compare to other Medicaid expansion states?

2. Goal Two - Increase community engagement leading to sustainable employment and improved health outcomes among HIP members

Indiana’s community engagement requirements aim to result in sustainable employment, increased income, and improved health outcomes among HIP members. **Exhibit B.2** below lists the hypotheses and research questions corresponding to this goal. Since the State indefinitely stopped all community engagement activities (effective April 30, 2020) after the submission of the Interim Evaluation Report, this plan addresses the appendix on community engagement but community engagement will no longer be evaluated for the Summative Evaluation Report. The Interim Evaluation Report addressed this goal consistent with the draft Evaluation Plan dated December 18, 2019 (submitted to CMS on December 19, 2019).

Exhibit B.2: Hypotheses and Research Questions for Goal 2 (only applicable for the Interim Evaluation Report)

Hypotheses	Research Questions
<p>Hypothesis 1 – Medicaid beneficiaries subject to community engagement requirements will have higher employment levels than Medicaid beneficiaries not subject to the requirements.</p>	<p>Primary research question 1.1: Are HIP members subject to community engagement requirements more likely than other similar Medicaid beneficiaries not subject to these requirements to be employed?</p> <p>Subsidiary research question 1.1a: Do HIP members who initially participate in qualifying activities other than employment gain employment within 6 months or one year (i.e., is there evidence of job-readiness progression)?</p> <p>Subsidiary research question 1.1b: Is employment among individuals subject to community engagement requirements sustained over time, including after separating from Medicaid?</p> <p>Primary research question 1.2: Is being subject to community engagement requirements associated with increases in educational level?</p>
<p>Hypothesis 2 – Community engagement requirements will increase the average income of Medicaid beneficiaries subject to the requirements compared to Medicaid beneficiaries not subject to the requirements.</p>	<p>Primary research question 2.1: Do community engagement requirements increase income?</p> <p>Subsidiary research question 2.1a: Do community engagement requirements change income from public assistance programs?</p> <p>Subsidiary research question 2.1b: Are changes in income sustained over time, including after separating from Medicaid?</p> <p>Subsidiary research question 2.1c: To what extent is community engagement associated with an increase in the number of HIP members transitioning off Medicaid because they are no longer income eligible for Medicaid?</p> <p>Subsidiary research question 2.1d: To what extent is community engagement associated with households transitioning off other public programs like SNAP or TANF?</p>
<p>Hypothesis 3 – Community engagement requirements will improve the health outcomes of current and former Medicaid beneficiaries subject to the requirements, compared to Medicaid beneficiaries not subject to the requirements.</p>	<p>Primary research question 3.1: Are community engagement requirements associated with improved health outcomes for beneficiaries subject to the requirements?</p> <p>Subsidiary research question 3.1a: What are the trajectories of HIP member health status over time, including after separation from Medicaid?</p> <p>Subsidiary research question 3.1b: Is disenrollment for noncompliance with community engagement requirements associated with differences in health outcomes?</p>

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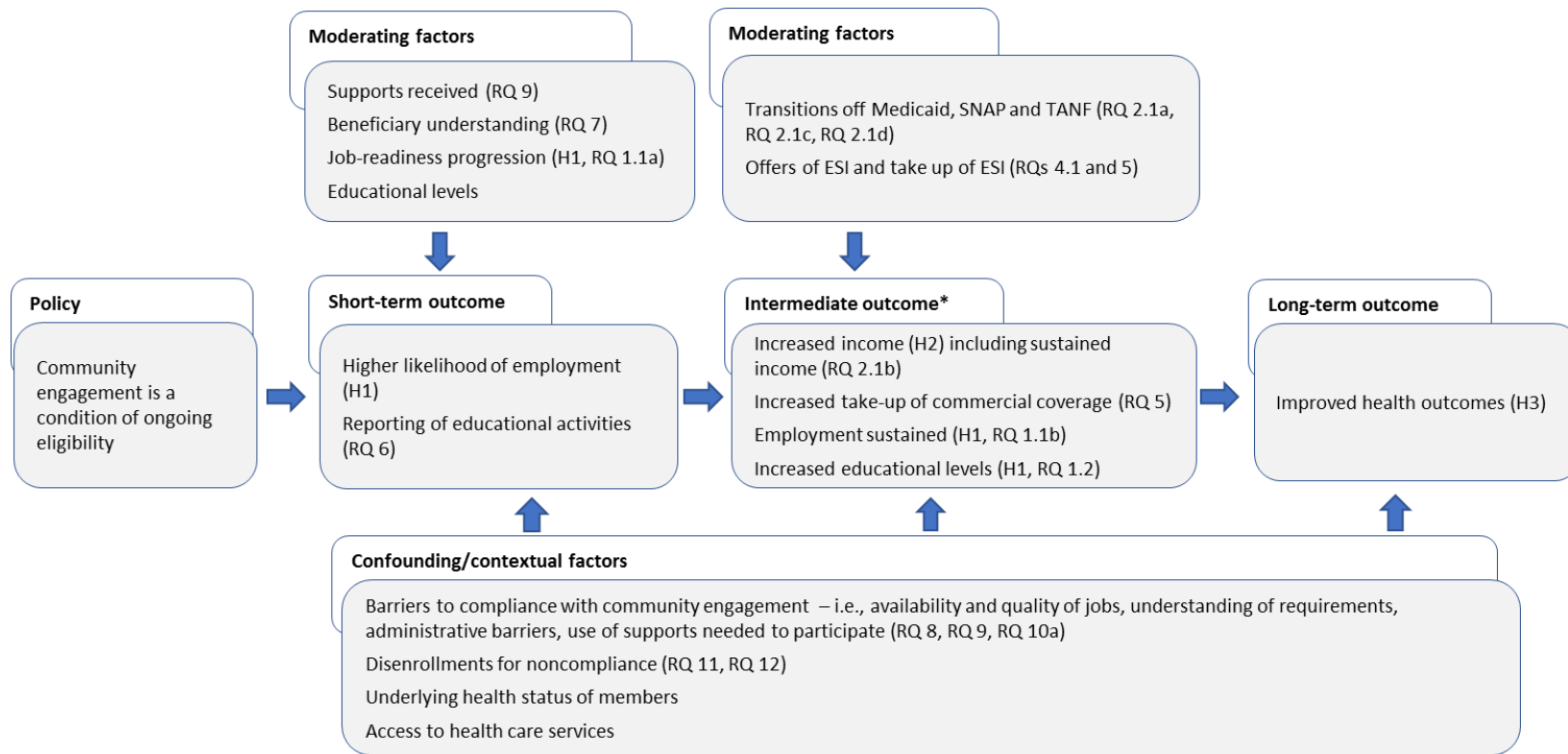
B. Evaluation Questions and Hypotheses

Hypotheses	Research Questions
<p>Hypothesis 4 – HIP policies including community engagement and required payment policies increase the likelihood that Medicaid beneficiaries transition to commercial health insurance after separating from Medicaid, compared to Medicaid beneficiaries not subject to the requirements.</p>	<p>Primary research question 4.1: What are the coverage outcomes of individuals who separate from HIP, by separation reason?</p>
<p>Implementation Questions</p>	<p>Primary research question 5: To what extent do individuals subject to community engagement requirements who become ineligible for Medicaid due to an increase in income obtain health insurance coverage?</p> <p>Primary research question 6: What is the distribution of activities HIP members engage in to meet community engagement requirements?</p> <p>Subsidiary research question 6a: How do activity patterns change over time?</p> <p>Primary research question 7: Do HIP members subject to community engagement requirements understand the requirements, including how to satisfy them and the consequences of noncompliance?</p> <p>Primary research question 8: What are common barriers to compliance with community engagement requirements?</p> <p>Primary research question 9: Do HIP members subject to community engagement requirements report that they received supports needed to participate, such as links to volunteer opportunities or job and education resources?</p> <p>Primary research question 10: What is the distribution of HIP members who are exempt, meeting the requirement through current work at 20 hours a week or more, or required to report qualified activities to maintain status? What is the distribution of exemption types and sources?</p> <p>Subsidiary research question 10a: What strategies has the State pursued to reduce HIP member reporting burden, such as matching to State or MCE database?</p> <p>Primary research question 11: What is the distribution of reasons for disenrollment among HIP members?</p> <p>Primary research question 12: Are HIP members who are disenrolled for noncompliance with community engagement requirements more or less likely to re-enroll than HIP members who disenroll for other reasons?</p>

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B. Evaluation Questions and Hypotheses

The logic model in **Exhibit B.3** depicts the expected short-term, intermediate, and long-term outcomes¹⁸ for community engagement.

Exhibit B.3: Logic Model for Goal 2 for Interim Evaluation Report



*CMS' logic model also included "ESI sustained" and "Marketplace enrollment" which is not being evaluated here.

¹⁸ Since we will be estimating the outcome measures based on data from the observation period (2015-2020), the evaluation will not provide conclusions about the long-term outcomes of the HIP program (e.g., related to health status, employment, and education level) beyond this period.

3. Goal Three - Discourage tobacco use among HIP members through a premium surcharge and the utilization of tobacco cessation benefits

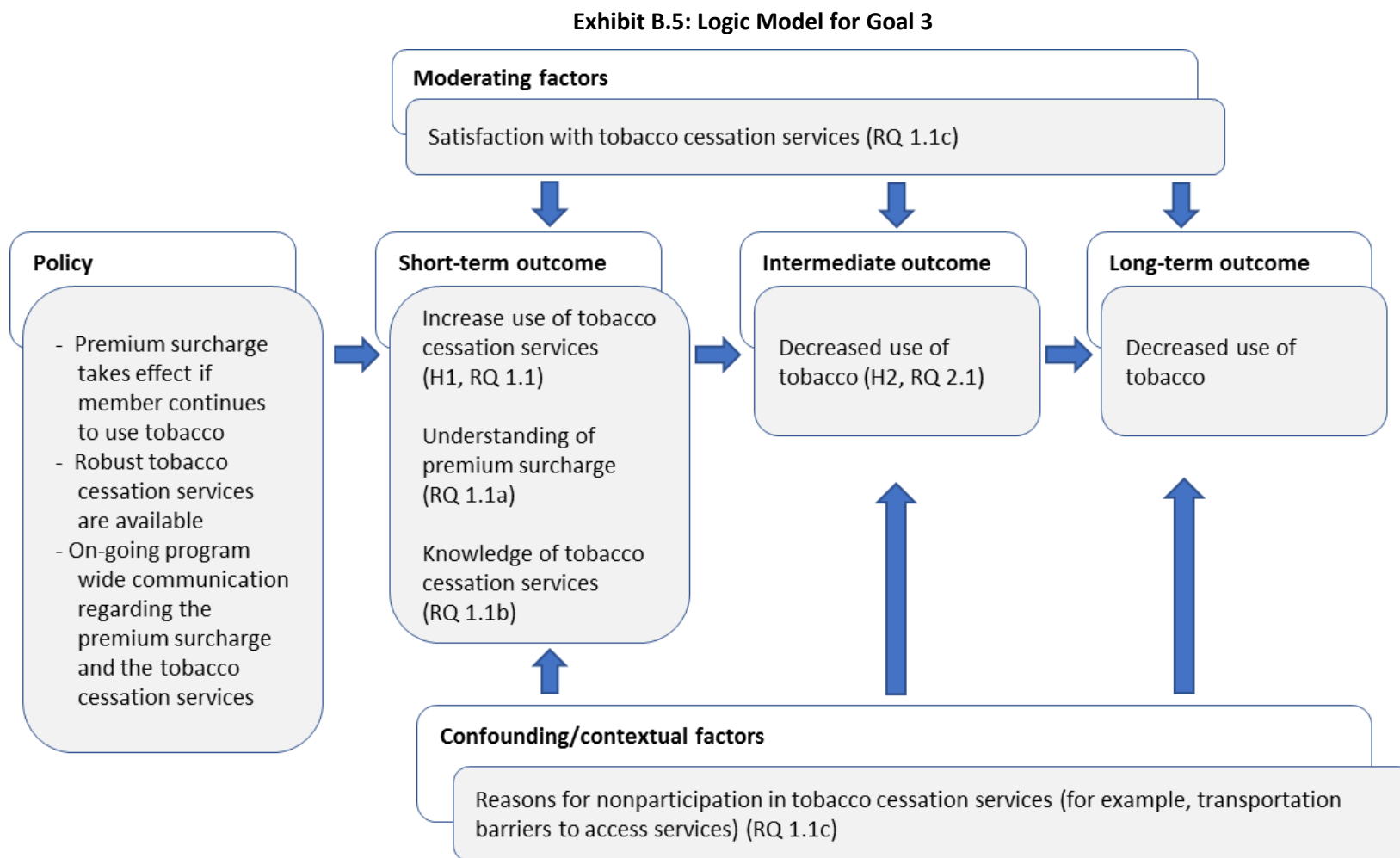
Indiana will test whether the POWER Account Contribution surcharge and utilization of tobacco cessation benefits will discourage tobacco use among HIP members. **Exhibit B.4** below lists the hypotheses and research questions corresponding to this goal.

Exhibit B.4: Hypotheses and Research Questions for Goal 3

Hypotheses	Research Questions
<p>Hypothesis 1 – The tobacco premium surcharge will increase use of tobacco cessation services among HIP members.</p>	<p>Primary research question 1.1: What impact has the tobacco premium surcharge had on the use of tobacco cessation benefits for HIP members?</p> <p>Subsidiary research question 1.1a: Do HIP members understand the premium surcharge policy?</p> <p>Subsidiary research question 1.1b: Do HIP members know about the cessation services offered through HIP?</p> <p>Subsidiary research question 1.1c: Are HIP members satisfied with tobacco cessation services?</p>
<p>Hypothesis 2 – The tobacco premium surcharge and availability of tobacco cessation benefits will decrease tobacco use.</p>	<p>Primary research question 2.1: Has tobacco use decreased among the target population?</p>

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B. Evaluation Questions and Hypotheses

The logic model in **Exhibit B.5** depicts the expected short-term, intermediate, and long-term outcomes¹⁹ for the premium surcharge and the utilization of tobacco cessation benefits.



¹⁹ Since we will be estimating the outcome measures based on data from the observation period (2015-2020), the evaluation will not provide conclusions about the long-term outcomes of the HIP program (e.g., related to health status, employment, and education level) beyond this period.

4. Goal Four - Promote member understanding and increase compliance with payment requirements by changing the monthly POWER Account payment requirement to a tiered structure.

Indiana will test whether the tiered POWER Account structure is easy to understand and increases compliance with payments²⁰ (**Subsection A.2** provides additional background on POWER Account policies). Research questions under Goal 1 cover efficient use of health care services as defined by utilization. **Exhibit B.6** below lists the hypotheses and research questions corresponding to this goal.

Exhibit B.6: Hypotheses and Research Questions for Goal 4

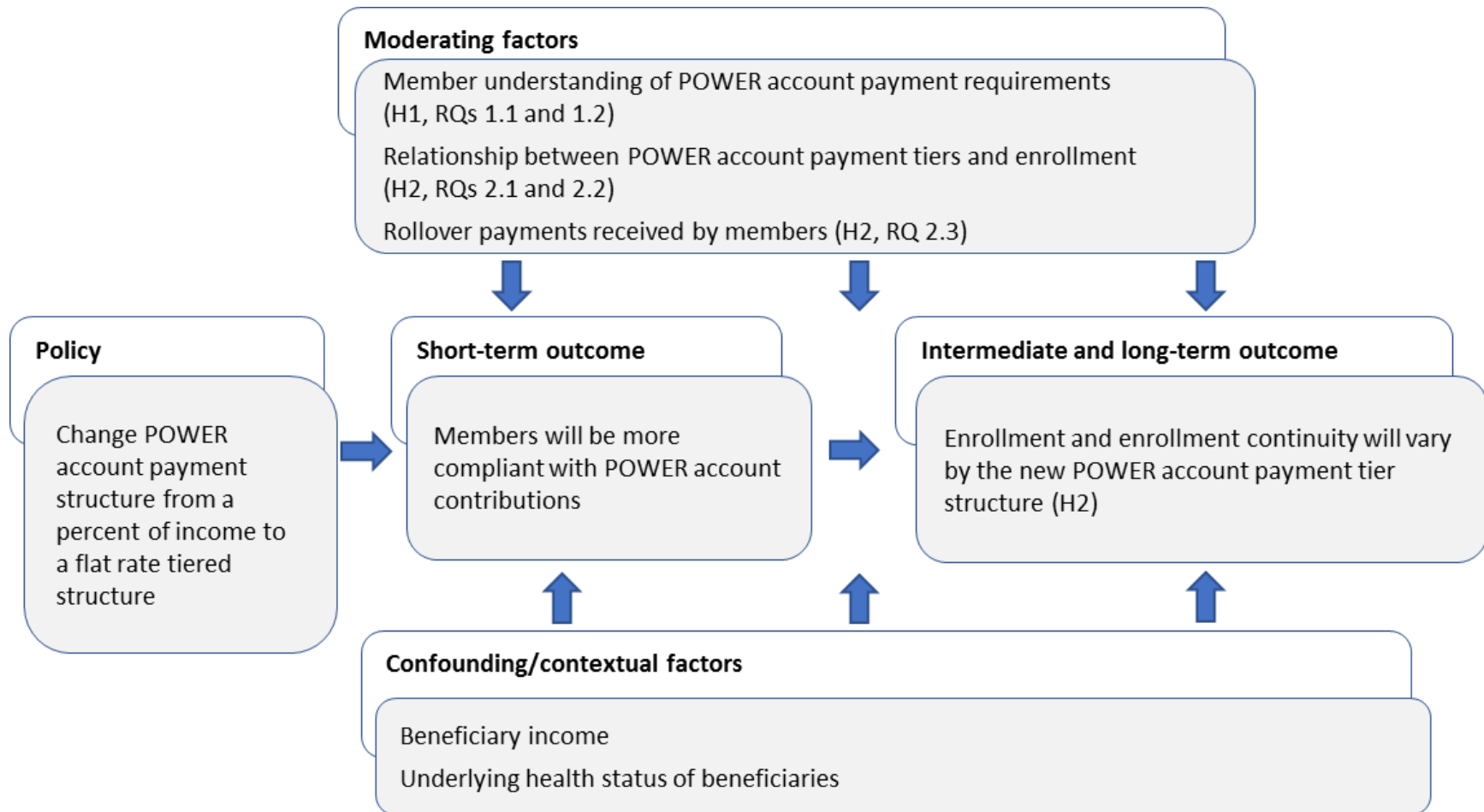
Hypotheses	Research Questions
Hypothesis 1 – HIP’s new income tier structure for POWER Account Contributions will be clear to HIP members.	<p>Primary research question 1.1: Do HIP members with POWER account payment requirements understand their payment obligations?</p> <p>Primary research question 1.2: Do HIP members with POWER Account payment requirements who initiate payments continue to make regular payments throughout their 12-month enrollment period?</p>
Hypothesis 2 – Enrollment and enrollment continuity will vary for the POWER Account payment tiers.	<p>Primary research question 2.1: Is there a relationship between POWER Account payment tiers and total and new enrollment in Medicaid?</p> <p>Primary research question 2.2: Is there a relationship between POWER Account payment tiers and continued enrollment in Medicaid?</p> <p>Primary research question 2.3: Do HIP members that receive rollover have greater coverage continuity than HIP members who do not receive rollover?</p>

²⁰ Previous versions of this goal included a reference to “efficient use of services” consistent with the STCs. This wording is no longer included as efficient use of services is addressed under Goal 1.

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The logic model in **Exhibit B.7** depicts the expected short-term, intermediate, and long-term outcomes²¹ for the tiered structure of the monthly POWER Account payment.

Exhibit B.7: Logic Model for Goal 4



²¹ Since we will be estimating the outcome measures based on data from the observation period (2015-2020), the evaluation will not provide conclusions about the long-term outcomes of the HIP program (e.g., related to health status, employment, and education level) beyond this period.

5. Goal Five - Ensure HIP program policies align with commercial policies, are understood by members, and promote positive member experience and minimize coverage gaps

Indiana will test whether the HIP policies align with commercial policies, use easy to understand language, and result in a positive member experience for all HIP members. **Exhibit B.8** below lists the hypotheses and research questions corresponding to this goal.

Exhibit B.8: Hypotheses and Research Questions for Goal 5

Hypotheses	Research Questions
<p>Hypothesis 1 – Beneficiaries subject to HIP policies will understand program policies.</p>	<p>Primary research question 1.1: Are HIP members knowledgeable about policies on payment of POWER Account Contributions, preventive care and rollover? Primary research question 1.2: Do HIP members subject to non-eligibility periods understand program requirements and how to comply with them? Primary research question 1.3: Do HIP members subject to non-eligibility periods understand the non-eligibility period consequence for noncompliance with program requirements? Primary research question 1.4: What are common barriers to compliance with program requirements that have non-eligibility period consequences for noncompliance?</p>
<p>Hypothesis 2 – Beneficiaries will be satisfied with the HIP program.</p>	<p>Primary research question 2.1: What is the level of satisfaction with HIP among HIP members?</p>
<p>Hypothesis 3 – Individuals subject to the non-eligibility/“lockout” periods (payment and redetermination) and retroactive eligibility are no different from commercial market populations.²²</p>	<p>Primary research question 3.1: Do HIP members that are subject to non-eligibility periods have similar demographic characteristics as the commercial market population? Primary research question 3.2: Do HIP members that are not retroactively eligible have similar demographic characteristics as the commercial market population?</p>

²² A core principal underlying HIP policy is that the program is designed for non-disabled working aged adults who may be moving between eligibility for HIP and eligibility for commercial coverage on a frequent basis and who are more closely aligned with commercial market populations than with traditional Medicaid populations. Thus, instead of mimicking traditional Medicaid, HIP pulls in elements of commercial market design including required cost sharing, lack of retroactive benefits, required monthly payments, enrollment periods, incentives, tobacco surcharges, and member accounts. This hypothesis looks to test the foundational theory of HIP that HIP enrollees are aligned with commercial market populations looking at enrollee’s subject to non-eligibility periods and enrollees subject to the retroactive coverage waiver.

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B. Evaluation Questions and Hypotheses

Hypotheses	Research Questions
Hypothesis 4 - Eliminating or reducing retroactive eligibility will not reduce member enrollment or access to health care; decrease health status; or have adverse financial impact ²³	Primary research question 4.1: Do eligible people subject to retroactive eligibility waivers enroll in Medicaid at the same rates as other eligible people who have access to retroactive eligibility? (CMS Guidance Hypothesis 1, RQ 1.1) Primary research question 4.2: Do beneficiaries subject to the retroactive eligibility waiver understand that they will not be covered during enrollment gaps? (CMS Guidance Hypothesis 1, Subsidiary RQ 1.2a) Primary research question 4.3: Do beneficiaries subject to the retroactive eligibility waiver have better health outcomes than other beneficiaries who have access to retroactive eligibility? (CMS Guidance Hypothesis 3, RQ 3.1) Primary research question 4.4: Does the retroactive eligibility waiver lead to changes in the incidence of beneficiary medical debt? (CMS Guidance Hypothesis 4, RQ 4.1)

²³ The hypothesis was included to address CMS' recommendation (received on 03/24/2020) to include analyses of the impact of the waiver of retroactive eligibility on member access and health.

6. Goal Six – Assess the costs to implement and operate HIP and other non-cost outcomes of the demonstration

Indiana’s goal is to assess the costs to implement and operate HIP and other non-cost outcomes of the demonstration. **Exhibit B.9** below lists the hypotheses and research questions corresponding to this goal. In order to reduce the duplication of efforts, and thus cost, this analysis will be completed by Indiana’s actuary, Milliman, Inc. and appended to the Summative Evaluation Report. The results will be incorporated into the overall evaluation analysis where relevant and as appropriate.

Exhibit B.9: Hypotheses and Research Questions for Goal 6

Hypotheses	Research Questions
<p>Implementation Questions</p>	<p>Primary research question 1.1: What are the administrative costs incurred by the State to implement and operate the HIP demonstration?</p> <p>Primary research question 1.2: What are the short- and long-term effects of eligibility and coverage policies on Medicaid health care expenditures?</p> <p>Primary research question 1.3: What are the impacts of eligibility and coverage policies on provider uncompensated care costs?</p>

C. Methodology

This section provides a summary of Indiana’s evaluation design, including data sources, target and comparison populations, evaluation period, and analytic methods. Throughout the previous HIP 2.0 demonstration, the State tracked meaningful measures of health care access, utilization, health outcomes, and member satisfaction. This Evaluation Plan builds on this tracking and expands the quantitative and qualitative data collection and analysis to reflect new program goals and to incorporate CMS’ Section 1115(a) Eligibility and Coverage Evaluation Guidance,²⁴ most notably:

- Impact of tobacco surcharge – The evaluation includes interrupted time series (ITS) analyses of tobacco cessation service use and tobacco use among HIP members.
- HIP members’ compliance with the new tiered POWER Account structure – The evaluation includes analyses of enrollment outcomes pre/post-implementation of the new tiered account structure among HIP members.

Prior drafts of this evaluation plan included statistical analyses to analyze the impact of community engagement requirements including descriptive statistics for the Interim Evaluation Report and ITS analyses for the Summative Evaluation Report. These analyses are no longer in consideration for the Summative Evaluation Report since the State indefinitely stopped all community engagement activities effective April 30, 2020.

Subsection C.2 describes how Indiana identified comparison groups and determined when an ITS or pre/post analysis was appropriate for a particular research question. Appropriate matching techniques (e.g., propensity score or Mahalanobis distance) will be used as necessary to identify and develop comparison groups.

The observation period for the evaluation will be CYs 2015 to 2020. This time period includes three years before the HIP renewal took effect in 2018 and three years following renewal. For some research questions and analyses, the time period is limited to fewer years. Since we will be estimating the outcome measures based on data from the observation period, the evaluation will not provide conclusions about the impact of the HIP program (e.g., related to health status, employment, and education level) beyond this period. The evaluation will include descriptive analysis of changes in the composition of the enrolled population and the evaluator will consider any findings from this analysis when interpreting the results of the analyses described in the Evaluation Plan.

Section F includes the analytic design tables for each goal, detailing the relevant hypotheses, research questions, data sources, outcome measures, analytic methods, and comparison group(s) (if applicable). These tables also specify the years of data to be used for individual research questions and the research questions to be addressed in the Interim and/or Summative Evaluation Reports. Goal 2 for community engagement is included in Section F for reference purposes even though community engagement will not be analyzed for purposes of the Summative Evaluation Report.

The ongoing coronavirus disease 2019 (COVID-19) public emergency, which started in March 2020, is anticipated to cause substantial changes to service utilization and provider availability in 2020, and will have short- and long-term impacts on Indiana’s health care system. Due to COVID-19, the State

²⁴ CMS. 1115 Demonstration State Monitoring & Evaluation Resources. Released and Accessed March 13, 2019 at <https://www.medicare.gov/medicaid/section-1115-demo/evaluation-reports/evaluation-designs-and-reports/index.html>

suspended HIP policies regarding POWER Account payment, tobacco surcharge, and disenrollment through at least August 31, 2020.²⁵ Social distancing and prioritization of health care resources are anticipated to affect utilization of a wide variety of services in the immediate future, even as telehealth services increase. Additionally, Medicaid enrollment will likely grow due to loss of income and some health care providers are anticipated to experience financial stress due to the short-term loss of income, and potential changes in payer mix as individuals lose employer-based coverage and Medicaid enrollment and the number of uninsured increases. The ability to use CY 2020 data to analyze the impact of the HIP policies from 2018 to 2020 will require careful consideration and be dependent on multiple factors including the time frame for reinstatement of HIP policies and the economic impact of COVID-19. Lewin will evaluate the inclusion of CY 2020 data during Summative Evaluation Report development. The suspension of key HIP policies due to COVID-19 has also required a modification to the CMS-recommended survey strategy, and is discussed in the *Data Sources and Collection* section below.

1. Data Sources and Collection

The evaluator will compile data from federal surveys as well as state-specific surveys, claims, and enrollment data. The evaluator will also capture qualitative data via key informant interviews (i.e., members, FSSA officials, MCEs, and providers). **Exhibit C.1** summarizes the data sources anticipated to be used to evaluate each goal (“X” indicates relevant sources for each goal), followed by detailed descriptions of key data sources. **Section F** provides specific information regarding how these data sources will be used in the evaluation.

²⁵ These policies were suspended March 17, 2020. Based on information available as of April 30, 2020.

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Exhibit C.1: Data Sources by Goal

Type	Data Sources	Goal 1 Access, Utilization, Health Outcomes	Goal 2 Community Engagement*	Goal 3 Tobacco Cessation	Goal 4 POWER Account	Goal 5 Positive Member Experience	Goal 6 Cost and Non-Cost
External – Quantitative	1. American Community Survey (ACS)	X	-	-	X	X	-
	2. Uncompensated care data as reported on Medicare cost reports	-	-	-	-	-	X
	3. Behavioral Risk Factor Surveillance System (BRFSS)	X	-	-	-	X	-
Indiana – Quantitative	1. Indiana Medicaid Historical Data <i>Note: Historical data will be leveraged as necessary for the goals.</i>	X	X	X	X	X	X
	2. Member Eligibility, Application, and Enrollment Data <i>Note: Enrollment data will be used to draw member survey samples that are applicable across goals.</i>	X	X	-	X	-	-
	3. Claims Data	X	-	X	-	-	-
	4. State administrative data – for example, POWER Account data, Gateway to Work data, POWER Account rollover data, data for tobacco use/cessation ²⁶	-	X	X	-	X	X
	5. Data reported by health plan, including Healthcare Effectiveness Data and Information Set (HEDIS) and annual chronic disease management program utilization	X	-	-	-	-	-
	6. Member Survey (2021)	X	-	X	X	X	-

²⁶ Other sources of State administrative data may be leveraged as available.

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Type	Data Sources	Goal 1 Access, Utilization, Health Outcomes	Goal 2 Community Engagement*	Goal 3 Tobacco Cessation	Goal 4 POWER Account	Goal 5 Positive Member Experience	Goal 6 Cost and Non-Cost
Indiana – Quantitative, continued	7. Leaver #1 – Income	-	-	-	-	X	-
	8. Leaver #2 – Power Account Contribution non-payment (2021)	-	-	-	-	X	-
Indiana – Qualitative	1. Key Informant Interviews with FSSA Officials		X	X	X	X	-
	2. Key Informant Interviews with MCEs		X	-	X	X	-
	3. Key Informant Interviews with MCEs on Tobacco-Related Topics	-	-	X	-	-	-
	4. Key Informant Interviews with Providers	-	X	X	X	X	-
	5. Key Informant Interviews with Members	-	X	X	X	X	-

* The information in this exhibit only reflects those data sources necessary for evaluation of Goal 2 for purposes of the Interim Evaluation Report, given that the State indefinitely stopped all community engagement activities effective April 30, 2020 in response to the COVID-19 public health emergency and the stay in the federal lawsuit involving Indiana Medicaid.

External Data Source Descriptions – Quantitative

American Community Survey (ACS): The ACS, sponsored jointly by the U.S. Census Bureau and the U.S. Department of Commerce, is a nationwide survey that collects and produces information on demographic, social, economic, and health insurance coverage characteristics of the U.S. population each year. See **Section E.4** for a description of key ACS variables.

Medicare Cost Report Data: Medicare cost report data contains provider information such as facility characteristics, utilization data and cost and charges by cost center. This data are available through the Healthcare Provider Cost Reporting Information System (HCRIS), which CMS maintains. Medicare cost report data include information on uncompensated care, bad debt and charity care.

Behavioral Risk Factor Surveillance System (BRFSS): The BRFSS is a nationwide survey operated jointly by the Centers for Disease Control and Prevention (CDC) and state health departments. The survey collects data on health status and health risk behaviors including chronic diseases, access to health care, and use of preventive health services related to the leading causes of death and disability for non-institutionalized population.

Internal Data Source Descriptions – Quantitative

Other applicable data sources may be included as available and validated. Current sources include:

- *Indiana Medicaid Historical Data:* Indiana Medicaid historical data refers to data that the State has summarized in previous assessments and evaluations, either directly or through contracted services for the previous HIP demonstration population. As necessary, the evaluation will use data summaries from previous HIP evaluations on a variety of metrics including POWER Account, enrollment, and utilization.
- *Member Eligibility, Application, and Enrollment Data:* Member application and enrollment data provide information on the size, location, and socio-demographic makeup of HIP enrollees (e.g., members with household income under 138% of the FPL).
- *Claims Data:* The claims records (encounter data) that the MCEs submit to the State provide information about the health care utilization patterns of all HIP enrollees and identifies enrolled HIP providers that are actively providing services.
- *State Administrative Data:* Program administrative data will include items related to POWER Accounts (e.g., member usage of POWER Account fund and POWER Account payments), Gateway to Work activities (e.g., reporting of qualifying activities and exemptions by member) and tobacco use status. Data will permit identification of individuals that have been suspended from Medicaid due to lack of compliance with community engagement activities or that have had HIP eligibility closed due to non-payment of POWER Account Contributions.

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- *HIP Surveys*: Surveys will capture the perspectives of members regarding HIP and contribute to addressing research questions across the evaluation. **Exhibit C.2** describes, by survey, the type of individuals to be surveyed, key topics, process for selecting the sample, mode of data collection, the targeted number of respondents, and statistical power assumptions. **Section F** provides additional information by research question. The Evaluation Plan dated December 18, 2019 included a longitudinal member survey to be fielded in 2020 with follow-up of the 2020 respondents in 2021 to study member experience over time. Due to the COVID-19 public health emergency, HIP policies regarding POWER Account Contribution payments, the tobacco surcharge, and disenrollment have been suspended through at least August 31, 2020.²⁷ This timing will not allow for a 2020 survey of members under HIP policies as, according to discussions with the State, at least three months will be necessary after reinstatement of the policies to re-establish full implementation of HIP program policies. The current plan instead includes a point-in-time cross-sectional 2021 member survey that will capture member experience under HIP waiver policies (as discussed with CMS on April 2, 2020 and April 16, 2020).

As appropriate and feasible, selection of members for survey data collection will be based on probability sampling methods, such as simple random sampling or stratified random sampling, to ensure that the sample is representative of the larger population under study, reduce bias, and increase validity of study findings.

In implementing each survey, the State will ensure that all informed consent procedures are followed, so that respondents are aware of the reason for the survey and have the information they need to fully participate. To maximize the response rate, the evaluator will leverage the most up-to-date contact information for sampled members using program administrative data.

All surveys will be administered using computer-assisted telephone interviewing (CATI) software to ensure data completeness and consistency. Prior to analysis, data will be weighted to adjust for sample design, non-response, and differences in characteristics between the survey respondents and the population. Participant rewards will not be provided.

The average survey length will be six minutes; a longer average survey length will result in a lower survey completion rate and strain existing evaluation resources. The evaluator will prioritize research questions within the available survey time and make adjustments to data collection accordingly.

²⁷ These policies were suspended March 17, 2020. Based on information available as of April 30, 2020.

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Exhibit C.2: Summary of Indiana-Specific Surveys

Area	Member Survey (Cross-Sectional)	Leaver Survey – POWER Account Contribution non-payment	Leaver Survey – Increased Income
Individuals Surveyed	Members having HIP Basic or HIP Plus coverage in a specific month	Individuals who had been fully enrolled in HIP but who left the program (i.e., coverage is closed) due to not paying the POWER Account Contribution	Individuals who had been fully enrolled in HIP but who left the program (i.e., coverage is closed) due to changes in income eligibility
Timeframe	2021	2021	2021
Topics	<ul style="list-style-type: none"> • Access to care • Health status • Tobacco use and related surcharge • Satisfaction with HIP and knowledge of HIP policies • POWER Accounts • Medical debt 	<ul style="list-style-type: none"> • Reasons for leaving HIP • Current insurance coverage/ employer offer of coverage • Knowledge of HIP policies • Access to care • Satisfaction with HIP 	<ul style="list-style-type: none"> • Reasons for leaving HIP • Current insurance coverage/ employer offer of coverage • Knowledge of HIP policies • Access to care • Satisfaction with HIP
Mode of Administration	Telephone Up to three attempts	Telephone Up to three attempts	Telephone Up to three attempts
Sampling Strategy	Stratified Random	Random	Random
Anticipated Timeline (May change depending on data availability or other program nuances and changes)	<ul style="list-style-type: none"> • Sampling Universe: All members enrolled with HIP Basic or HIP Plus in March 2021 • Select sample: April 2021 • Survey instrument test: May 2021 • Conduct survey: June – July 2021 	<ul style="list-style-type: none"> • Sampling Universe: HIP members who disenrolled from HIP after reinstatement of suspension of HIP policies in 2020 due to the COVID-19 public health emergency⁽¹⁾ • Select sample: March 2021 • Survey instrument test: April 2021 • Conduct survey: May – June 2021 	<ul style="list-style-type: none"> • Sampling Universe: HIP members who disenrolled from HIP after reinstatement of suspension of HIP policies in 2020 due to the COVID-19 public health emergency⁽¹⁾ • Select sample: March 2021 • Survey instrument test: April 2021 • Conduct survey: May – June 2021

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Area	Member Survey (Cross-Sectional)	Leaver Survey – POWER Account Contribution non-payment	Leaver Survey – Increased Income
Estimated number of completed surveys	4,500	250 ⁽²⁾	400 ⁽²⁾
Statistical power assumptions	<p>Assuming a population of 400,000, this sample size will allow for estimating population metrics (e.g., proportion has access to care) with 95% confidence level with a margin of error of +/-1.38%.</p> <p>The adequacy of the sample size for conducting subgroup analyses was assessed for one outcome of interest (high HIP satisfaction); the sample size supports comparisons (detectable difference of 10% or more with confidence level of 95% and power level of 80%) between HIP Basic and HIP Plus members and between members who are below and above 100% FPL.</p>	<p>Assuming a population of 5,000,⁽¹⁾ this sample size will allow for estimating population metrics (e.g., proportion has access to care) with 95% confidence level with a margin of error of +/-6.05%.</p> <p>Subgroup analysis may be limited due to sample size. The adequacy of the sample for subgroup analysis will be assessed prior to analysis.</p>	<p>Assuming a population of 28,000,⁽¹⁾ this sample size will allow for estimating population metrics (e.g., proportion has access to care) with 95% confidence level with a margin of error of +/- 4.86%.</p> <p>Subgroup analysis may be limited due to sample size. The adequacy of the sample for subgroup analysis will be assessed prior to analysis.</p>

(1) The population for sampling will depend on the timing of reinstatement of HIP policies and potential long term impact of the COVID-19 public health emergency.

(2) Due to the small population size and anticipated high non-response, the survey process will involve calling all available individuals until the target sample size has been achieved or until the evaluator has reached the maximum number of dialing attempts. The completed number of responses may be lower than the target.

Internal Data Source Descriptions – Qualitative

In addition to quantitative data collection and analysis, Indiana will conduct key informant interviews to capture member and provider experience and evaluate other outcomes related to each goal. Participant responses to targeted questions will provide an opportunity to explore trends and outliers in the quantitative data, and allow participants to use their own words to describe their experiences. Indiana will identify potential participants based on existing contacts and other member and provider lists including enrollment data. Indiana is not planning to use any monetary incentives for recruitment and participation will not affect member enrollment status. **Exhibit C.3** describes the targeted number of interviewees, timeframe, and potential topics.

Exhibit C.3: Summary of Indiana-Specific Qualitative Data Collection – Key Informant Interviews

Type	Potential Topics	Targeted Number of Interviewees	Timeframe*
FSSA Officials	<ul style="list-style-type: none"> • Implementation of HIP POWER Account changes, community engagement requirement, and tobacco surcharge • Identification of factors related to member enrollment and participation in/compliance with policy changes • Member satisfaction 	8 semi-structured interviews (including group interviews) each year	2019, 2020, 2021
MCEs	<ul style="list-style-type: none"> • Implementation of HIP POWER Account changes, community engagement requirement, and tobacco surcharge • Identification of factors related to member enrollment and participation in/compliance with policy changes • Member satisfaction 	4 semi-structured interviews with representatives from the four MCEs each year	2019, 2020, 2021
Providers	<ul style="list-style-type: none"> • Understanding of and experience with HIP policies—community engagement, POWER Accounts, tobacco surcharge, tobacco cessation services • Member satisfaction with HIP 	50 to 70 <i>Note: To be determined based on provider availability. Interviews will include provider associations and certified navigators</i>	50 in 2019 (36 completed in 2019) <i>Note: The number of interviews and timing in 2020 and 2021 will depend on area of interest for follow-up based on other data.</i>
HIP Members	<ul style="list-style-type: none"> • Access to care • Tobacco use • Satisfaction with HIP • Knowledge of HIP policies—community engagement, POWER Accounts, tobacco surcharge, tobacco cessation services • Process for and barriers to reporting community engagement activities 	80 to 100 <i>Note: To be determined based on member availability.</i>	25 interviews in 2019 (27 completed in 2019) <i>Note: The number of interviews and timing in 2020 and 2021 will depend on area of interest for follow-up based on other data.</i>
Other Stakeholders	<ul style="list-style-type: none"> • Topics to be determined based on key areas of interest from the State 	10 <i>Note: To be determined based on stakeholder availability.</i>	2020, 2021

*Conducting the 2020 key informant interviews in 2020 will depend on the evolution of the COVID-19 public health emergency and the timing of the reinstatement of HIP policies.

2. Target and Comparison Populations

The target population for analysis is all beneficiaries covered by HIP or – where applicable and possible – the HIP member sub-population specific to the research question and related outcome measure(s). HIP includes low-income, non-disabled adults ages 19 to 64. The other adults eligible for Medicaid in Indiana include individuals who are 65 and older, blind, or disabled and who are also not eligible for Medicare, or low-income adults who can receive home and community-based services or who are in nursing homes and other facilities.

During the development of strategies for comparative analyses, both within-state and other-state comparison groups who are similar to HIP members but not subject to the policies being evaluated were considered. Ideally, a comparison group used to evaluate the impact of program implementation is a population with similar demographics but without comparable program or policy changes.

CMS' guidance outlined several possible within-state comparison groups,²⁸ which are not feasible or ideal for this evaluation due to specific aspects of Indiana HIP, specifically:

- The State includes all eligible non-elderly, non-disabled adults in HIP. The unique characteristics of other Medicaid-eligible adults in the state (e.g., individuals with disabilities and children less than 19 years of age) limits the availability of appropriate within-state comparison groups for the HIP evaluation.
- HIP does not involve random assignment and the State has not staged HIP policy implementation based on beneficiary characteristics.
 - All HIP members are enrolled in Gateway to Work regardless of exemption status and receive the same communications, access to resources, and ability to report hours.
 - Changes to POWER Account Contribution payment tiers apply to all HIP members interested in enrolling in HIP Plus.

For these reasons, depending on the research question, Indiana's Evaluation Plan uses two types of comparison groups: (1) HIP population prior to policy implementation, and (2) other state Medicaid populations, with a particular focus on states that did not implement any comparable demonstrations during the evaluation period and have populations with similar demographic characteristics.

In instances when adequate data are available before and after policy implementation, the evaluator will develop quasi-experimental analyses (e.g., ITS). For such analyses, the HIP population post-policy implementation is the target while the member population prior to policy implementation is the comparison group. As necessary, the evaluator will explain in the Interim and Summative Evaluation Reports why regression discontinuity designs using age, medical frailty, or parents with dependents were not used.

²⁸ Feedback received previously from CMS included considering use of regression discontinuity (RD) designs using age and medical frailty cutoffs, where feasible. For instance: RD around the age 60 cutoff for CE requirements and difference-in-differences comparing those just above and just below the age 60 cutoff; threshold for medical frailty; and parents with dependents.

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Exhibit C.4 summarizes a preliminary set of states to be considered for comparison based on select characteristics. Prior to developing the relevant analyses for the Summative Evaluation Report,²⁹ the evaluator will refine this set to two to three states, taking into account recent state-specific policy changes, if the state has a retroactive eligibility waiver in place, and/or data challenges that might make comparisons challenging. The evaluator may choose to vary the final states selected by research question. The below parameters were used to select the preliminary set of states:

- Expanded Medicaid to childless adults, have similar eligibility for childless adults as Indiana, and expansion did not take place during the evaluation time period.
- Have not implemented the 1115(a) waiver policy under study (e.g., community engagement requirements) but are similar to Indiana in other Medicaid policies.
- Have similar population characteristics.
- Have sufficient sample size for analysis.

Depending on the research question, ACS or BRFSS will be used for cross-state or cross-coverage type (Medicaid versus commercial) comparisons. In addition to age (19-64), income (138% FPL or less using FPL or reported income) the evaluator will leverage other available variables to approximate the HIP population (e.g., Medicaid eligible population). There are limitations to the ability to define these comparison groups, however, and Indiana’s Summative Evaluation Report will include discussion of how these limitations affect the interpretation of the results.³⁰

Indiana anticipates identifying the ACS sample size by including individuals that:

- Live in households with income less than 138% of the FPL (Integrated Public Use Microdata Series (IPUMS) ACS variable POVERTY)
- Are 19-64 years old (IPUMS ACS variable AGE)
- Are not covered by Medicare (IPUMS ACS variable HINSCARE)
- Are not receiving social security income (IPUMS ACS variable INCSUPP)

The definition of the study population may be based on either (1) likely eligible or (2) Medicaid-enrolled individuals. The sample representing the likely eligible population can be identified in ACS using the variables listed above, while the “Have Medicaid coverage (IPUMS ACS variable HINSCAID)” variable can be used in addition to the others listed to identify the sample representing the potential Medicaid enrolled population. The evaluator will explore and assess use of analysis results based on both approaches and will include a comprehensive rationale and relevant analyses in Summative Evaluation Report on the choice of a specific population definition (e.g., why the enrolled population was used instead of the eligible population or vice-versa).

²⁹ Comparison group analyses are only included in the Summative Evaluation Report due to the timeframe of data required for analysis.

³⁰ For example, it will not be possible to remove all individuals who are excluded from Indiana’s community engagement requirements such as pregnant women (ACS does not contain a pregnancy variable) and individuals who have been recently incarcerated or are receiving substance use disorder treatment.

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Exhibit C.5 provides the anticipated sample sizes for ACS for both definitions of the study population under consideration. Once the Indiana and other state samples are identified from the ACS, the evaluator will conduct descriptive analyses to assess the similarities and differences in the Indiana sample compared to the other state samples in terms of key characteristics (e.g., age, race, sex). The evaluator will consider the need for leveraging appropriate matching techniques (e.g., propensity score or Mahalanobis distance) to identify matching comparison group of beneficiaries who are similar to the Indiana sample members. The evaluator will apply this same approach as appropriate when using other data sources to perform cross-state comparisons; the Summative Evaluation Report will include a description of the approach(es) and the rationale for selection.

The evaluator will use BRFSS data to analyze health status and medical debt of the Medicaid-eligible population as indicated in **Section F** (Goal 1 and Goal 5) for the Summative Evaluation Report. BRFSS data will only allow for the identification of the likely eligible Medicaid population; it is not possible to identify the enrolled Medicaid population. Indiana anticipates identifying the likely eligible Medicaid population using the following criteria:

- Include respondents age between 18 and 64 (AGE65YR - Reported age in five-year age categories)
- Exclude respondents that report household income of more than \$15,000 (INCOME2 – income is reported in income categories such as “less than \$10,000” instead of by FPL)
- Exclude respondents with self-reported employment status of “unable to work” (EMPLOY1)
- Exclude pregnant women (variable “PREGNANT”)

Exhibit C.6 provides the anticipated sample sizes for likely eligible Medicaid population in BRFSS. The evaluator will explore additional options to identify the samples representing the likely eligible Medicaid population during Summative Evaluation Report development.

Section F provides additional detail regarding how these comparison groups will be used and also identifies unique within-state comparison groups pertinent to specific research questions.³¹

³¹ Goal 5, Primary Research Question 2.3 (HIP members who do not receive rollover) and Subsidiary Research Question 3.1 (Low-income adults in Indiana enrolled in commercial coverage)

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Exhibit C.4: Summary of Key State Characteristics

Characteristic	Indiana	Colorado	Minnesota	New Mexico	Pennsylvania	Washington
Non-Elderly Adult Expansion FPL Percent ³²	138%	138%	138%	138%	138%	138%
Percent Unemployed ³³	3.6%	3.5%	3.2%	5.1%	3.9%	4.6%
Minimum Wage ³⁴	\$7.25	\$11.10	\$9.86/\$8.04 ³⁵	\$7.25	\$7.25	\$12.00
Percent Rural Households ³⁶	31%	24%	35%	35%	17%	16%
Percent Uninsured ³⁷	8.2%	7.6%	4.5%	9.1%	5.5%	6.1%
Percent Employees with Employer Offer ³⁸	82%	83%	83%	80%	88%	85%
Race (selected) ³⁹	79% White 9% Black 7% Hispanic 2% Asian	68% White 4% Black 22% Hispanic 3% Asian	80% White 6% Black 5% Hispanic 5% Asian	37% White 2% Black 49% Hispanic 1% Asian	77% White 11% Black 7% Hispanic 3% Asian	69% White 3% Black 13% Hispanic 9% Asian
Type of Marketplace ⁴⁰	Federally-facilitated	State-based	State-based	State-based with Federal Platform ⁴¹	Federally-facilitated	State-based

Note: All of the states listed expanded their Medicaid programs prior to 2015.

³² Henry J. Kaiser Family Foundation. Medicaid and CHIP Eligibility, Enrollment, and Cost Sharing Policies as of January 2019: Findings from a 50-State Survey. Retrieved May 3, 2019 from <https://www.kff.org/medicaid/report/medicaid-and-chip-eligibility-enrollment-and-cost-sharing-policies-as-of-january-2019-findings-from-a-50-state-survey/>

³³ Bureau of Labor Statistics. Local Area Unemployment Statistics for March 2019. Retrieved May 3, 2019 from <https://www.bls.gov/web/laus/laumstrk.htm>

³⁴ National Conference of State Legislatures State 2019. Minimum Wages by State. Retrieved May 3, 2019 from <http://www.ncsl.org/research/labor-and-employment/state-minimum-wage-chart.aspx#Table>

³⁵ For large employers, with an annual sales volume of \$500,000 or more, the minimum wage is currently \$9.50; for small employers, those with an annual sales volume of less than \$500,000, the minimum wage is \$7.75.

³⁶ University of Minnesota. 2017 American Community Survey accessed through IPUMS USA. Retrieved May 3, 2019 from <https://usa.ipums.org/usa/>

³⁷ Ibid.

³⁸ Medical Expenditure Panel Survey. Insurance Component 2017 Chartbook, Exhibit 1.3. Retrieved May 3, 2019 from https://meps.ahrq.gov/data_files/publications/cb22/cb22.pdf

³⁹ Henry J. Kaiser Family Foundation. Population Distribution by Race/Ethnicity, 2017. Retrieved May 11, 2019 from <https://www.kff.org/other/state-indicator/distribution-by-raceethnicity/?currentTimeframe=0&sortModel=%7B%22colId%22:%22Location%22,%22sort%22:%22asc%22%7D>

⁴⁰ Henry J. Kaiser Family Foundation. State Insurance Marketplace Types 2018. Retrieved May 3, 2019 from <https://www.kff.org/health-reform/state-indicator/state-health-insurance-marketplace-types/>

⁴¹ While New Mexico has a state-based marketplace with a federal platform, the state component of the marketplace only applies to small employers/employees.

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Exhibit C.5: ACS Sample Sizes for Key States

Note: The adequacy of the sample sizes for testing Medicaid uptake in comparison to other states was assessed; the sample sizes support comparisons (detectable difference of 5% or more with confidence level of 95% and power level of 80%) between Indiana and other states.⁴²

Definition	Year	Indiana	Colorado	Minnesota	New Mexico	Pennsylvania	Washington
Likely Eligible for Medicaid	2015	7,773	5,103	4,168	2,990	12,472	6,692
	2016	7,216	5,135	4,075	2,750	12,370	6,490
	2017	7,065	5,096	3,957	2,843	11,936	6,186
Medicaid Enrolled	2015	2,069	2,018	1,879	1,414	3,952	2,848
	2016	2,328	1,839	1,847	1,449	4,564	2,898
	2017	2,378	1,923	1,775	1,534	4,680	2,715

Exhibit C.6: BRFSS Sample Sizes for Key States

Note: The adequacy of the sample sizes for testing medical debt and health status in comparison to other states was assessed; the sample sizes support comparisons (detectable difference of 10% or more with confidence level of 95% and power level of 80%) between Indiana and other states. Current sample sizes will not allow for any robust statistical tests of differences between subgroups within a state.⁴³

Definition	Year	Indiana	Colorado	Minnesota	New Mexico	Pennsylvania	Washington
Likely Eligible for Medicaid	2015	137	400	415	188	176	423
	2016	190	319	360	152	183	330
	2017	336	322	497	243	225	458

⁴² University of Minnesota. 2017 American Community Survey accessed through IPUMS USA. Retrieved May 3, 2019 from <https://usa.ipums.org/usa/>

⁴³ Behavioral Risk Factor Surveillance System (BRFSS), Retrieved May 7, 2020 from <https://nccd.cdc.gov/weat/#/analysis>

3. Analytic Methods

Indiana will use a mixed-methods approach employing both quantitative and qualitative analyses to answer the research questions in this evaluation. Qualitative analyses will support an understanding of stakeholders' perspectives related to context, implementation, and outcomes and will identify contextual factors that help to explain outcomes. Quantitative analyses will examine changes in outcomes and estimate the impact of policy changes, as demonstration design and data permit. Quantitative and qualitative analyses will reinforce each other and contribute to understanding context, implementation, impact, and variation.

The evaluation will employ a convergent approach incorporating mixed methods. With a convergent approach, qualitative data and analysis may inform the collection, analysis, and interpretation of quantitative data, and quantitative data and analysis can inform the collection, analysis, and interpretation of qualitative data. For example, interviews with HIP members will provide important contextual information that may help to explain the results of claims analysis, and the claims analyses may inform the development of survey and interview protocols. Both quantitative and qualitative data will be used throughout the course of the evaluation. Any quantitative analyses that leverages survey sample data will apply appropriate sample weights and weighting techniques.

Qualitative Analyses: Qualitative data collected through interviews will be analyzed using thematic analysis, a systematic data coding and analysis process during which information is categorized with codes developed iteratively to reflect themes or patterns within the data.

Quantitative Descriptive and Trend Analyses: Descriptive statistics (e.g., total, average, proportion) will be calculated to summarize the characteristics of HIP members (across time where necessary) as well as observational inference on trends in outcomes of interest. For the Summative Evaluation Report, where applicable and feasible, we will leverage appropriate statistical tests (e.g., Chi-Square test for independence) to test for differences between HIP members and comparison groups or to test for differences between subgroups of interest. These tests will use, as appropriate, regression based adjustments to control for changes in member characteristics to estimate changes in measures of interest across time. The descriptive statistics along with related statistical analyses (test for difference or regression adjustments as appropriate) will be used to analyze impact of HIP 2018 policies on member utilization of health care, health status, tobacco cessation services and compliance with program policies.

Cross-Sectional Analyses: We will use cross-sectional models to assess associations and compare risk-adjusted outcomes for HIP members to comparison beneficiaries. Standard power calculations will be conducted to ensure adequacy of sample sizes in available data for model development. A variety of parametric models and techniques to estimate the models are available. The outcome variable characteristics, for example type (e.g., categorical or continuous) and distribution (e.g., normal, skewed), will be used to determine the model specifications (e.g., logistic, linear, log-linear). Models will include beneficiary and geographic-level covariates to control for differences between the groups of interest. The covariates will include demographic characteristics, income level, health status, regional characteristics, and other variables that are relevant and available within the data sources used.

Quantitative Impact Analyses: Because the implementation of Indiana’s policy changes did not involve a randomized control design (as discussed in *Target and Comparison Population* section), the evaluation will use quasi-experimental approaches to estimate the impact of policy changes. Specifically, the evaluation will use a difference in differences (DiD) approach to address several research questions. DiD is a regression technique that measures the impact of the model by comparing changes in risk-adjusted outcomes for the target population to changes in outcomes in a comparison group, between the baseline and intervention periods. Standard power calculations will be conducted to assess adequacy of sample size in available data for model development. We will ensure model specifications are appropriate for the outcome variable (e.g., logit for dichotomous outcomes) of interest. Models will include beneficiary and geographic-level covariates to control for differences between the groups of interest. The covariates will include demographic characteristics, income level, health status, regional characteristics, and other variables that are relevant and available in the data sources used. The validity of the DiD approach relies on the assumption that the intervention and comparison groups were on parallel trends in the baseline. Tests for parallel trends in the baseline period for key outcomes will be conducted using statistical testing and visual trend analysis.

When a comparison group is not available but multiple years of data (before and after the policy change) are available for HIP members, the evaluation will rely on an ITS design (or a pre/post design if only two points in time are available) to assess change in an outcome before and after the policy change. To strengthen this analysis, multivariate regression analysis will be used to control for possible confounders. Prior to implementing these analyses, pre-implementation trends will be evaluated and comparability in samples over time will be assessed, relying on appropriate methods (e.g., matching) to address sample differences.

Subgroup Analysis: These analyses will be conducted as part of descriptive, cross-sectional, and interrupted time-series analyses (as listed in Section F). The type and number of subgroup analyses will be determined by appropriateness for the research question, and as data and sample sizes allow. The primary ITS or DiD analysis will produce estimates of the average impact of a policy change. However, the impact may vary by beneficiary subgroups (e.g., by older and younger HIP members, by length of enrollment, by income, by region within state). To inform the selection of characteristics that will define subgroups, information gathered through interviews as well as through the descriptive analysis will be considered. The evaluator will first test whether subgroups of HIP and comparison beneficiaries are adequately balanced across key characteristics. If necessary, matching methods will be used to develop subgroup-specific comparison groups, so that intervention and comparison groups are balanced in observed characteristics. The ability to look at subgroups and differentiated effects is ultimately limited by the number of beneficiaries in each group and the variability in the data. The independent evaluator will weigh the value of testing for differences among subgroups against having adequate sample size and power to do so precisely.

D. Methodological Limitations

Exhibit D.1 describes the known limitations of the evaluation and anticipated approaches to minimizing those limitations and/or acknowledges where limitations might preclude casual inferences about the effects of demonstration policies. **Section C** contained information on limitations regarding identifying comparison groups and the potential impact of the COVID-19 public emergency on the use of 2020 data for evaluation purposes. The Interim and Summative Evaluation Reports will describe limitations of the evaluation, which may include data and methodological challenges and other limitations identified during the evaluation process that are not described below. These reports will acknowledge approaches taken by the evaluator and necessary modifications made to the Evaluation Plan to address these challenges and limitations.

Exhibit D.1: Summary of Methodological Limitations and Approach to Minimizing Limitations

Area	Issue	Description	Anticipated Approaches to Minimizing Limitations
Overall issues	Limited ability to control for differences between states when using other State Medicaid populations as a comparison group	State Medicaid populations are different in observable and unobservable ways. For example, state-specific policies and economies vary from state to state. Available variables and sample sizes in proposed federal data sources (e.g., ACS) limit the ability to control for these differences.	<ul style="list-style-type: none"> • Select states for comparison that: <ul style="list-style-type: none"> ○ Did not implement comparable demonstrations during the evaluation period ○ Implemented Medicaid expansion prior to 2015 ○ Have similar Medicaid eligibility FPL requirements for adults ages 19-64 ○ Have similar geographic variation ○ Have sufficient sample sizes • Include a description in the Summative Evaluation Report of types of differences that cannot be taken into account given available evaluation resources and data limitations. • Use appropriate methods (e.g., matching) to account for observable differences.
	Impact of COVID-19	The ongoing COVID-19 public health emergency, which started from March 2020, is anticipated to cause substantial changes to: <ul style="list-style-type: none"> • Service utilization • Medicaid enrollment • Provider networks 	<ul style="list-style-type: none"> • Use and inclusion of CY 2020 data to analyze impact of HIP 2018 policies will require careful analyses, and be dependent on multiple factors including the time frame for reinstatement of HIP policies and COVID-19's economic impact.

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Area	Issue	Description	Anticipated Approaches to Minimizing Limitations
Overall issues, continued	Quality of provider contact information for key informant interviews	Provider contact information reliability made completing provider key informant interviews challenging. For example, provider email addresses and phone numbers listed in the MCE provider list often provided only generic office email addresses.	<ul style="list-style-type: none"> • Obtain support from key provider associations to identify providers for key informant interview purposes. • Use interviews with key provider associations in lieu of individual providers as necessary • Make modifications to the Summative Evaluation Report’s approach to key informant provider interviews (including the number of providers) based on the experience with key informant provider interviews during the Interim Evaluation Report.
	Ability to identify HIP members within ACS survey data	HIP members include low-income (<138% FPL), non-disabled adults aged 19-64; HIP members also include the medically frail, TMA participants, and low-income parents and caretakers. Available fields within ACS will limit the ability to identify all of these groups.	<ul style="list-style-type: none"> • Use available survey fields related to Medicaid coverage, income, disability, and age. • Highlight in the evaluation narrative what HIP member characteristics could not be taken into account.
	Ability to use BRFSS data to identify individuals enrolled in HIP and potentially eligible for HIP	BRFSS data does not allow for identification of individuals in the sample enrolled in Medicaid. Additionally, BRFSS data fields do not allow for a full identification of individuals that are potentially eligible for HIP. HIP members include low-income (<138% FPL), non-disabled adults aged 19-64; HIP members also include the medically frail, TMA participants, and low-income parents and caretakers.	<ul style="list-style-type: none"> • Use available survey fields related to income, disability, and age (Medicaid enrollment is not an available field). • Include in the evaluation narrative that BRFSS survey data can only identify individuals that are potentially eligible for HIP; describe related limitations for analyses.
	Impact of changes in case-mix over time	Changes in HIP case mix over time may have an impact on a variety of areas of this evaluation, including service utilization, prevalence of medical frailty exemptions for the Gateway to Work program, and member preference for the HIP Plus versus HIP Basic benefit plan.	<ul style="list-style-type: none"> • Provided context for interpretation of results. • For the Summative Evaluation Report, use regression-based adjustments as appropriate and necessary for analyses across time.

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D. Methodological Limitations

Area	Issue	Description	Anticipated Approaches to Minimizing Limitations
Overall issues, continued	Number of respondents for leaver surveys (due to increased income, due to non-payment of POWER Account Contribution)	The completed number of responses may be lower than the target sample size. Obtaining responses from previous members is dependent on the non-response rate and total population of leavers. The population size of leaver for sampling will depend on the timing of reinstatement of HIP policies and potential long term impact of the COVID-19 public health.	<ul style="list-style-type: none"> • The survey process will involve calling all available individuals until the target sample size has been achieved or until the evaluator has reached the maximum number of dialing attempts.
	Survey length / respondent burden and corresponding response rate for member surveys	The average survey length will be six minutes; a longer average survey length will result in a lower survey completion rate and strain existing evaluation resources.	<ul style="list-style-type: none"> • Prioritize research questions within the available survey time and make adjustments to data collection accordingly.
	Quality of MCE encounter data	MCE encounter data is self-reported and the procedure codes and units recorded in the encounter data analyzed for the evaluation of the 2015 to 2017 demonstration period appeared incomplete and/or inaccurate.	<ul style="list-style-type: none"> • Perform data checks on key variables (e.g., expected versus populated values). • Adjust or eliminate analyses as necessary if data are not reliable.
	Identification of unique HIP members	Recipient identification numbers can change over time and the State performs on-going adjustments to data so that each member has only one active recipient identification number.	<ul style="list-style-type: none"> • Confirm whether data received from the State is fully adjusted for duplicate members. • Request a mapping of duplicate recipient identification numbers, if applicable. • Indicate in the Interim and Summative Evaluation Reports if there is a possibility that data analyzed contains duplicated HIP members.

Indiana 1115(a) Demonstration Evaluation Plan

D. Methodological Limitations

Area	Issue	Description	Anticipated Approaches to Minimizing Limitations
<p>Overall issues, continued</p>	<p>Identification of FPL</p>	<p>Member income can change throughout the year and as often as monthly. We anticipate defining member FPL based on the first enrollment month in the CY under analysis (based on analyses of the income in enrollment data and feedback from the State). There may be FPL amounts in the data that appear inconsistent with HIP policies (e.g., a small number of HIP Plus members with income at or less than 100% had disenrollments with non-payment as a reason). Based on discussions with the State, there are several possible reasons for inconsistencies, for example:</p> <ul style="list-style-type: none"> • The member changed income after the first HIP Plus enrollment month in the CY under analysis. • Interplay between the required member notification for coverage changes (e.g., HIP Plus to HIP Basic) and when the State/MCE received and updates data, in conjunction with member changes in FPL across months. • Inconsistencies in FPL data transfer between eligibility and the Medicaid Management Information System that resulted in null FPL values on disenrollment, which appear as zero in provided enrollment data and in some cases in the application of updated FPL numbers to prior months. The State has indicated that this data issue is resolved but on a minority of historical records included in this analyses these data artifacts remain. 	<ul style="list-style-type: none"> • Do not place restrictions on FPL when identifying HIP Plus members for analysis. • Provided context for interpretation of results.

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D. Methodological Limitations

Area	Issue	Description	Anticipated Approaches to Minimizing Limitations
Overall issues, continued	Limitations of interrupted time series (ITS) and pre/post analyses	ITS involves estimating the impact of an intervention based on pre/post analyses of an outcome of interest based on a longitudinal measure of outcome. Use of this approach can be unsuitable to measure the impact of intervention in certain situations, including: <ul style="list-style-type: none"> • Intervention is introduced gradually or at multiple points in time, making it difficult to identify and quantify for pre/post measures. • Characteristics of the population with intervention changes across time. • Underlying trend is not linear; other factors are also impacting the population (e.g., simultaneous implementation of a different). 	<ul style="list-style-type: none"> • Perform checks of population differences over time; consider matching or other appropriate methods to address observed differences. • Use regression analysis to control for potential confounders to the extent possible.
	Distinguishing the impacts of overlapping initiatives	Multiple policy changes have been implemented under the renewal. As such, distinguishing the impacts of the individual initiatives becomes challenging. In addition to the HIP waiver policies, non-waiver operational items have overlapping impacts, for example: <ul style="list-style-type: none"> • Implementation of a new Medicaid Management Information System in 2017. • Updates to verification policies over time. • New processes for reporting and tracking community engagement activities. 	<ul style="list-style-type: none"> • Provide context for interpretation of results in the Interim and Summative Evaluation Reports, including the need for caution in interpreting and presenting results for take-up and continued enrollment in HIP.
Goal 1: Improve health care access, appropriate utilization, and health outcomes among HIP members	Variations in health care utilization based on time of enrollment	Members may experience higher utilization of service when first enrolled in Medicaid based on previously unmet health care needs. This higher utilization may make identification of trends in the use of preventative, primary, urgent and specialty care challenging.	<ul style="list-style-type: none"> • Use members continuously enrolled for at least one year to calculate the participation rate for each service type.

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D. Methodological Limitations

Area	Issue	Description	Anticipated Approaches to Minimizing Limitations
<p>Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members</p>	<p>Gradual phase-in of community engagement requirements</p>	<p>The State is phasing in the community engagement reporting requirements during 2019 and the first six months of 2020, with members required to report hours for the first time starting in July 2019. As such, member experiences and compliance with these requirements in 2019 and 2020 will not reflect full implementation.</p>	<ul style="list-style-type: none"> • Include a description in the Interim and Summative Evaluation Reports of how this gradual phase-in might affect results.
<p>Goal 3: Discourage tobacco use among HIP members, through a premium surcharge and the utilization of tobacco cessation benefits</p>	<p>Tobacco surcharge is only assessed on members who self-report tobacco use via defined channels</p>	<p>The tobacco surcharge determination relies on reporting of tobacco use by members during the MCE selection period, when changing MCEs, or if members otherwise voluntarily contact the MCE to report their tobacco use status. This underestimates the number of members who continue to use tobacco.</p>	<ul style="list-style-type: none"> • Provide context for this issue in the Interim and Summative Evaluation Reports.
	<p>Members may under-report tobacco use</p>	<p>Members may have an incentive to refrain from reporting tobacco use if they want to avoid the related premium surcharge increase.</p>	<ul style="list-style-type: none"> • Provide context in the evaluation narrative for this issue.
	<p>Medicaid encounter data may not fully reflect use of tobacco cessation services</p>	<p>Encounter data will not have codes for all tobacco cessation service since some programs will not be reimbursable by the provider.</p>	<ul style="list-style-type: none"> • Ask questions about MCE tobacco cessation initiatives during key informant interviews with MCEs • Ask questions about cessation services received during member key informant interviews

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D. Methodological Limitations

Area	Issue	Description	Anticipated Approaches to Minimizing Limitations
Goal 4: Promote member understanding and increase compliance with payment requirements by changing the monthly POWER Account payment requirement to a tiered structure	Ability to use ACS data to identify Medicaid populations in other states that match Indiana’s HIP program members subject to POWER Account payment policies	ACS data are limited in regards to excluding populations that are exempt from the HIP POWER Account non-payment penalty, specifically individuals who are: <ul style="list-style-type: none"> • Medically frail • Living in a domestic violence shelter • In a state-declared disaster area 	<ul style="list-style-type: none"> • Include a description of limitations of the comparisons in the Summative Evaluation Report and potential impact on the interpretation of the results
	Variability in FPL amounts	Discussed as an overall methodological limitation above	<ul style="list-style-type: none"> • Refer to description above.
Goal 5: Ensure that HIP policies promote a positive member experience for all HIP members	Distinguishing impact of retroactive eligibility waiver	<ul style="list-style-type: none"> • Due to the inclusivity of HIP coverage, there is no comparable in-state population that can be used to measure the impact of the retroactive eligibility waiver. HIP 2.0 has covered all non-disabled, low-income adults between 19 and 64 years old with household income at or below 138% of the FPL since 2015. During that same time period, only pregnant women and individuals with disabilities have retroactive coverage. • Medicaid programs across states can be very different in policies and implementation. Any differences in measures of interest when comparing with other states will likely not purely be due to the impact of the retroactive eligibility waiver and may include the impact of other policy differences. • Comparing program experience pre- and post-2015 will likely not capture impact of retroactive eligibility waiver due to the multiple program policies that have been implemented over time. 	Provide context for interpretation of results in the Summative Evaluation Reports, including the need for caution in interpreting and presenting results for impact of retroactive eligibility waiver on member access to care, health status and medical debt.

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D. Methodological Limitations

Area	Issue	Description	Anticipated Approaches to Minimizing Limitations
<p>Goal 6: Assess the costs to implement and operate HIP and other non-cost outcome of the demonstration</p>	<p>Expenditures and enrollment may be affected by factors other than eligibility and coverage policies</p>	<p>Neglecting to control for other factors such as changes in the economy, demographic shifts, individual market changes, or coverage changes in other Medicaid programs could result in mistakenly attributing their impact to that of the demonstration.</p>	<ul style="list-style-type: none"> • Per Member Per Month (PMPM) expenditures will be normalized for changes in population mix • Additional variables will be considered in the difference-in-differences regression model to control for alternative factors • Model results and residuals will be iteratively examined to determine if other significant factors may have been omitted and can be added
	<p>Difficulty in controlling for factors related to the reporting of hospital uncompensated care</p>	<p>There are many factors that affect the reporting of hospital uncompensated care, including if HCRIS Worksheet S-10 is relied upon for payment purposes in the State (if not, hospitals may not report data fully), hospital reporting practices, state-specific Medicaid shortfalls, and the proportion of uninsured or underinsured individuals in a state.</p>	<ul style="list-style-type: none"> • Control for the proportion of uninsured and underinsured individuals in the state • Include a discussion in the Summative Evaluation Report of the potential impact of aspects of hospitals' uncompensated care reporting that are not easy to measure • Evaluate if Worksheet S-10 data are used for payment purposes in the comparison states (which would suggest that they are more fully completed by hospitals)

E. Attachments

Attachment E.1. Summary of Independent Evaluator Approach

In April 2018, the State of Indiana posted and distributed a request for proposals (RFP) to acquire an independent party to evaluate the HIP Program. A copy of the RFP and all related attachments are publically available at <https://www.in.gov/idoa/proc/bids/rfp-18-091/>. All bidders were required to provide information on evaluations they have initiated in other states that could be replicated in Indiana, processes that would be unique to Indiana, any license sanctions or formal complaints that they have been subject to, and any corrective actions, if applicable. Similarly, bidders had to describe their experience in evaluating other Section 1115 Medicaid waivers, statewide healthcare programs, programs authorized by the United States Department of Health and Human Services, and any other equivalent experience. In addition, they had to describe any experience, if any, in evaluating other programs where employment (and vocational training and engagement leading to employment) was a key objective. Once the State received and reviewed proposal responses, Indiana selected to work with The Lewin Group, Inc. (Lewin) for the evaluation. Lewin demonstrated that they had the technical expertise and resources available to conduct a rigorous evaluation.

In order to ensure an independent evaluation, the evaluation process will be independent of any process involving program policy making, management, or activity implementation of the waiver demonstration. The State's responsibility towards an independent evaluation is the assurance of quality data to the evaluator, support in understanding program context of any data anomalies, and identifying the program components that are important for the evaluation. Additionally, Lewin has provided a copy of their Organizational Conflict of Interest (OCI) Disclosure Statement to the State of Indiana. This ensured that there were no conflicts of interest to report as stated in Section XV, Paragraph 1 of CMS's STCs for HIP Waiver Evaluation. A copy of the OCI is available below.

The sustainability component of this evaluation is a new CMS requirement that was not originally included in the independent evaluator search. Incorporating this work into their contract substantially increased the cost of the evaluation. In an effort to avoid duplication of work, and reduce costs, the State of Indiana received permission to use the State's actuary, Milliman Inc., to facilitate this portion of the evaluation.

Exhibit E.1: Organizational Conflict of Interest

Exhibit A to Lewin Transmittal Letter

Organizational Conflict of Interest Disclosure Statement
RFP: 18-091: Healthy Indiana Plan (HIP) 1115 Waiver Evaluation

The Lewin Group, Inc. (“Lewin”) is submitting a proposal in response to the Indiana Department of Administration on behalf of the Indiana Family and Social Services Administration (“FSSA”) Request for Proposal 18-091 (“RFP”). FSSA is seeking a Vendor to assist in its comprehensive evaluation of the Healthy Indiana Plan 1115 Waiver demonstration (hereby referred to as the “HIP Evaluation”).

In accordance with the RFP, Section 1.25-CONFLICT OF INTEREST, FSSA prohibits the submission of a proposal from an entity, including individuals that has worked with and/or advised the State in the preparation of the RFP, or has hired a state employee who has worked on the preparation of this RFP within one year prior to its publication. After reviewing these restrictions, Lewin can confirm to FSSA that no such Conflict of Interest (“COI”) would exist should it be awarded a contract under this RFP.

Additionally, in accordance with the Centers for Medicare and Medicaid (“CMS”) Special Terms and Conditions (“STC”) 11-W-00296/5, Attachment A-Developing the Evaluation Design, Section F-Conflict of Interest, FSSA is required to assure CMS that it will obtain an Independent Evaluator which will “conduct a fair and impartial evaluation, prepare an objective Evaluation Report, and that there would be no conflict of interest.” These types of COIs are normally referred to as Organizational Conflicts of Interest (“OCI”). Accordingly, what follows in this Disclosure Statement (“Disclosure”) is an explanation of why an award to Lewin as the HIP Evaluation Contractor under this RFP will not create an actual or potential OCI. This Disclosure is organized to describe; 1) Lewin’s relevant corporate affiliates and, 2) Lewin’s OCI analysis.

I. Lewin’s Affiliate Interests

Lewin is part UnitedHealth Group, Incorporated (“UHG”), a diversified health and well-being company dedicated to improving the health care system in the United States. UHG is organized into seven (7) businesses. Four of those businesses — UnitedHealthcare Employer & Individual, UnitedHealthcare Community & State (“C&S”), UnitedHealthcare Medicare & Retirement and UnitedHealthcare Military & Veterans — provide network-based health care benefits and related services under the “UnitedHealthcare” brand. The other three (3) businesses operate under the “Optum” brand and include OptumHealth, OptumRx, and OptumInsight. The Optum businesses offer health technology and innovation support services. Although UHG provides certain shared services across the enterprise, Optum and United operate as separate businesses with separate operational structures and separately reported financial results. For more information, please see www.unitedhealthgroup.com and www.optum.com.

In conducting its OCI analysis, Lewin identified three (3) affiliated businesses relevant for discussion, and are as follows:

- *MedExpress*: MedExpress, which is part of OptumHealth, is an urgent care provider operating in over one two hundred (200) neighborhood care centers in eighteen (18) states, including Indiana. MedExpress offers medical services, such as wellness and preventative care, imaging and lab services, and worker’s compensation and occupational medical services. MedExpress serves consumers, health systems, employers, health plans and other payers. MedExpress currently provides services to eligible Indiana Medicaid recipients in seven (7) locations throughout the State which include Anderson, Bloomington, Indianapolis, Kokomo, Lafayette, Marion, and Muncie.
- *OptumRx*: OptumRx specializes in the delivery, clinical management and affordability of prescription medications and consumer health products. It serves over 65 million members, processes more than one billion pharmacy claims annually and has a national network of approximately 67,000 community pharmacies. OptumRx serves customers in multiple markets and government programs, including commercial, managed care, Medicaid, Medicare, labor and trust, workers compensation and others. In 2015, OptumRx acquired Catamaran, which, similar to OptumRx, provides full-service pharmacy benefits

management services, including mail order and specialty pharmacy benefits, for both government and private sector employer groups, union trusts, managed care organizations, Medicare-contracted plans, Medicaid plans and third party administrators. Its services include claims processing, retail network contracting, rebate contracting and management, and clinical programs, such as step therapy, formulary management and disease/drug therapy management programs. OptumRx is presently under contract with FSSA to provide pharmacy benefit management services for the Indiana Health Coverage Program.

- *UnitedHealthcare Community and State (“UHC C&S”)*: UHC C&S provides healthcare services through public sector health plans to beneficiaries in Medicaid and the Children Health Insurance Program (“CHIP”) in twenty-eight (28) states and the District of Columbia. UHC C&S plans are Medicaid Managed Care Organizations (“MCOs”) serving Medicaid (Title 19), CHIP (Title 21), Dually Eligible, Long Term Care and Children with Special Needs (Title V). Presently, C&S is not an MCO in the State of Indiana.

II. Lewin’s OCI Analysis

For the purpose of this OCI Analysis, Lewin refers to the Federal Acquisition Regulation Part 9.5 which defines three types of conflicts. Upon review, Lewin is not aware of any facts or circumstances that would create an actual or potential OCI. To the extent that an OCI may be perceived to exist, Lewin will explain how the OCI is avoided, neutralized, or mitigated. These conclusions are based on the following:

A. Biased Ground Rules

A Biased Ground Rules OCI arises where a company, as part of its performance of a government contract, sets the ground rules for a later government procurement by, for example, writing the statement of work or the specifications. The primary concern is that the company could create an unfair competitive advantage by biasing the competition in favor of itself or its affiliate. Neither Lewin nor any of its affiliates has engaged in the development of this RFP, or in assisting FSSA in the procurement represented in the RFP. Accordingly, no Biased Ground Rules OCI exists.

B. Impaired Objectivity

An Impaired Objectivity OCI commonly occurs when a company’s work under one government contractor could require the company to evaluate the work that company itself or its affiliates performed under a separate government contract. The primary concern is that the company’s ability to render impartial advice to the government could be impaired, where that advice involves the use of subjective judgment, and where the advice could affect the economic interests of the company as broadly construed. Lewin has not identified any situation while performing work as the contracted Independent Evaluator under this RFP that would create an actual or potential Impaired Objectivity OCI. The purpose of this evaluation is to determine the impact of HIP with regard to eligible Indiana Medicaid recipients and their access to health care services, utilization of those services, and health outcomes. FSSA requires that the evaluation utilizes both data and outcomes from the previous HIP 2.0 demonstration, along with data and outcomes from the analysis of added policy enhancements approved by CMS for this demonstration renewal. As the awarded Contractor, Lewin will work under an FSSA/CMS-approved evaluation design in accordance with evaluation guidance set forth in CMS STC 11-W-00296/5. Data for the evaluation data is collected from FSSA-directed sources to include statewide Medicaid member surveys, focus groups, key informant interviews, and prescribed data sets from the Indiana Medicaid Management Information System (“MMIS”). Data sets required by Lewin for analysis from state MCOs are provided to Lewin directly from state staff members. Given these requirements and parameters, Lewin’s work is objective and administrative, and significantly restricts Lewin from exercising subjective judgment. Furthermore, there is no nexus between the outcomes of Lewin’s evaluation of this demonstration and the financial interests of Lewin or any of its affiliates providing healthcare services Indiana Medicaid recipients. As such, no Impaired Objectivity OCI exists.

C. Unequal Access to Information

An Unequal Access to Information OCI exists where a company has access to non-public information as part of its performance of a government contract and that information may provide the company with an unfair competitive advantage in a later competition for a government contract. Lewin has not had access to non-public information that has given it an unfair advantage in competing for contract under this RFP. Lewin recognizes, however, if it were awarded a contract under this RFP, Lewin may have access to non-public and confidential

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E. Attachments, Attachment E.1. Summary of Independent Evaluator Approach

information such as claims and benefit data from Indiana MCOs. If this information was inadvertently accessed by Lewin's UHC C&S affiliate it could conceivably generate an unfair competitive advantage in future MCO competitions in Indiana. However, any such OCI concerns would be unfounded because Lewin understands and complies with its obligation to handle non-public and confidential information in accordance with applicable laws, regulations, and contract requirements. As a result, in the regular course of its business, Lewin has implemented measures that would prospectively prevent any Unequal Access to Information OCI from occurring and that includes the following:

- *Information and Security Firewalls:* Lewin has established effective firewalls to prevent unauthorized use or disclosure of protected information and to guard against the risk of even inadvertent disclosure of such information. These firewalls provide an information disclosure barrier between Lewin and other business units and employees of UHG. All protected program information in electronic form will be maintained on a secure, password-protected server that is dedicated to Lewin. Electronic documents or data files containing protected information will be accessible only to Lewin employees on a need to know basis.
- *Physical Separation:* Lewin's work will be performed by employees at Lewin's office in Falls Church, Virginia and all servers and data will be similarly housed at this location. This office space is physically separate from the rest of Lewin's affiliates. The office has physical security systems in place designed to prevent unauthorized entry and access to both computer systems and hard copies of files. Staff from Lewin's affiliates is treated like any other visitor, meaning that they must sign in and must be escorted by Lewin staff within the secure portion of the office suite.
- *Separate Staffing:* The personnel that Lewin uses for the contract are separate and distinct from the staff used by Lewin's affiliates. There is no overlap of staffing in this regard between the very separate businesses.
- *Information Security Policies and Procedures:* Lewin has implemented numerous P&Ps regarding the manner in which employees are to handle and disclose confidential information. This includes, for example a "need-to-know" policy, which provides that individual employees have access to the minimal amount of confidential information necessary to perform his or her work on the specific project to which the employee is assigned. Furthermore, Lewin employees are annually trained on the firewall and its policies and have a continuing obligation to report suspected violations of the policy, including any suspected violations of the information firewall. This obligation is emphasized as part of their training on the enterprise Code of Conduct. The policy identifies the company hotline and other means through which they may make such a report (anonymously, if desired). Employees are advised that violations could result in consequences such as termination of employment.
- *Contract Requirements:* In accordance with Attachment B-Sample Contract of the RFP, Lewin as the awarded Contractor is required abide by HIPAA Rules as such Rules apply to Business Associates.

IV. Conclusion

For all the foregoing reasons, an award of a contract to Lewin under this RFP would not create an actual OCI nor adversely affect or impact FSSA. Lewin understands that, if it were to be awarded a contract under this RFP, there is a continuing obligation to provide assurance to FSSA that no OCIs arise in the course of performing the work. In the event there is a change in facts that would give rise to an actual or significant, potential OCI, Lewin will promptly disclose the circumstances to FSSA, along with a mitigation plan, and Lewin will not proceed with performing the conflicted work until a mutually acceptable mitigation plan is in place.

Attachment E.2. Evaluation Budget

The budget for the Independent Evaluation from the awarded evaluator contract is included below. Oversight and support of this contract and provision of data to the evaluator on behalf of the state are considered to be encompassed in general program administrative costs and are not reported in this document. The required analyses specifically related to the sustainability of the demonstration waiver will leverage its existing contract with Milliman Inc. for incorporation into the Summative Evaluation Report.

Exhibit E.2: Evaluation Budget-Total Costs

	State Fiscal Year	Dates	Deliverable Costs
Base 5-Year Contract	SFY 2019	(8/1/18 to 6/30/19)	\$ 277,893.50
	SFY 2020	(7/1/19 to 6/30/20)	\$ 1,396,573.56
	SFY 2021	(7/1/20 to 6/30/21)	\$ 200,312.00
	SFY 2022	(7/1/21 to 6/30/22)	\$ 1,152,194.51
	SFY 2023	(7/1/22 to 6/30/23)	\$ 384,064.84
4-Year 11-Month Contract Total			\$ 3,411,038.41

Exhibit E.3: Evaluation Budget-Deliverables by State Fiscal Year

Deliverable	SFY 2019	SFY 2020	SFY 2021	SFY 2022	SFY 2023
3.1 Evaluation Design	\$ 76,135.50				
3.2 Quarterly Monitoring Report - Q1	\$ 1,446.00	\$ 1,446.00			
3.2 Quarterly Monitoring Report - Q2	\$ 1,446.00	\$ 1,446.00	\$ 1,446.00		
3.2 Quarterly Monitoring Report - Q3	\$ 1,446.00	\$ 1,446.00	\$ 1,446.00		
3.2 Annual Monitoring Report	\$ 2,288.00	\$ 2,288.00	\$ 2,288.00		
3.3 Interim Evaluation Report		\$ 1,194,815.56			
3.4 Final Summative Evaluation Report				\$ 1,152,194.51	\$ 384,064.84
3.5 Ad Hoc Report - 1	\$ 97,566.00	\$ 97,566.00	\$ 97,566.00		
3.5 Ad Hoc Report - 2	\$ 97,566.00	\$ 97,566.00	\$ 97,566.00		
Total for All Deliverables	\$ 277,893.50	\$ 1,396,573.56	\$ 200,312.00	\$ 1,152,194.51	\$ 384,064.84

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E. Attachments, Attachment E.3. Timeline and Major Milestones

Attachment E.3. Timeline and Major Milestones

Exhibit E.4: Timeline and Milestones

Task	2018	2019				2020				2021				2022			
	Oct-Dec	Jan-Mar	Apr-Jun	Jul-Sep	Oct-Dec	Jan-Mar	Apr-Jun	Jul-Sep	Oct-Dec	Jan-Mar	Apr-Jun	Jul-Sep	Oct-Dec	Jan-Mar	Apr-Jun	Jul-Sep	Oct-Dec
Prepare and Implement Evaluation Design																	
Conduct kick-off meeting																	
Draft Evaluation Design																	
Receive CMS Feedback and Evaluation Guidance Documents																	
Revise Evaluation Design																	
Receive CMS Approval																	
Data Collection or Data Pull																	
External Data Sources-Quantitative																	
American Community Survey (ACS) Data																	
Behavioral Risk Factor Surveillance System (BRFSS) Data																	
Indiana Data Sources-Quantitative																	
Enrollment/Claims Pull and Analysis																	
Administrative Data--POWER Account, Gateway to Work Program Data, Tobacco Program Data																	
Member Survey (2021)																	
Leaver Survey(s) (2021)																	
Indiana Data Sources-Qualitative																	
Key Informant Interviews with FSSA Staff, MCEs, Providers, HIP Members																	
Conduct Analysis																	
Quantitative Analysis																	
Qualitative Analysis																	
Reporting																	
Quarterly Report																	
Annual Report																	
Draft Interim Report																	
Final Interim Report																	
Draft Summative Report																	
Final Summative Report																	

Attachment E.4. Variable Descriptions for ACS Data to be Used in this Evaluation

Exhibit E.5: American Community Survey Variable Descriptions⁴⁴

Domain	Name	Variable	Description
Age	AGE	Age	Person's age in years as of the last birthday.
Children	CHBORN	Children Ever Born	Number of children ever born to each woman. Women report all live births by all fathers, whether or not the children were still living; they exclude stillbirths, adopted children, and stepchildren.
Citizenship	CITIZEN	Citizenship Status (U.S. Citizenship Status)	Citizenship status of respondents, distinguishing between naturalized citizens and non-citizens. Respondents were asked to select one of five categories: (1) born in the United States, (2) born in Puerto Rico, Guam, the U.S. Virgin Islands, or Northern Marianas, (3) born abroad of U.S. citizen parent or parents, (4) U.S. citizen by naturalization, or (5) not a U.S. citizen. Respondents indicating they are a U.S. citizen by naturalization also are asked to print their year of naturalization.
Disability Status	DISABWRK	Disability Status	Per the Institute of Medicine (IOM) and the International Classification of Functioning, Disability, and Health (ICF), disability is defined as the product of interactions among individuals' bodies; their physical, emotional, and mental health; and the physical and social environment in which they live, work, or play. Disability exists where this results in limitations of activities and restrictions to full participation at school, at work, at home, or in the community
Education	EDUC	Educational Attainment	Indicates respondents' educational attainment, as measured by the highest year of school or degree completed. Note that completion differs from the highest year of school attendance; for example, respondents who attended 10th grade but did not finish were classified in EDUC as having completed 9th grade.
Education	SCHLTYPE	Type of School	Indicates whether respondents attending school were enrolled in a public or a private school.
Education	SCHOOL	Attending School	Indicates whether the respondent attended school at the time of interview in the past three months.
Education	GRADEATT	Level attending	Reports the grade or level of recent schooling for people who attended "regular school or college" at the time of interview in the past three months. "Regular school or college" includes only nursery school or preschool, kindergarten, elementary school, and schooling that leads to a high school diploma or a college/graduate degree.

⁴⁴ University of Minnesota. IPUMS USA Variables. Retrieved April 19, 2019 from <https://www.usa.ipums.org/usa-action/variables>

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E. Attachments, Attachment E.4. Variable Descriptions for ACS Data to be Used in this Evaluation

Domain	Name	Variable	Description
Health Coverage	HCOVANY	Any Health Insurance Coverage	Indicates whether the respondent had any health insurance coverage at the time of interview, including employer-provided insurance, privately purchased insurance, Medicare, Medicaid or other governmental insurance, TRICARE or other military care, or Veterans Administration-provided insurance.
Health Coverage	HINSCAID	Health Insurance through Medicaid	Indicates whether, at the time of interview, the respondent was covered by Medicaid, Medical Assistance, or any other kind of government-assistance plan for those with low incomes or a disability.
Health Coverage	HINSCARE	Health insurance through Medicare	Indicates whether, at the time of interview, the respondent was covered by Medicare.
Income	INCWAGE	Wage and salary income	Respondent's total pre-tax wage and salary income (e.g., money received as an employee) for the previous year. For the ACS and the Puerto Rican Community Survey (PRCS), the reference period was the past 12 months. Sources of income include wages, salaries, commissions, cash bonuses, tips, and other money income received from an employer. Payments-in-kind or reimbursements for business expenses are not included.
Income	INCSUPP	Supplementary Security income	Reports how much pre-tax income (if any) the respondent received from Supplemental Security Income (SSI) during the previous year. Amounts are expressed in contemporary dollars, and users studying change over time must adjust for inflation.
Income	INCSS	Social Security income	Reports how much pre-tax income (if any) the respondent received from Social Security pensions, survivors benefits, or permanent disability insurance, as well as U.S. government Railroad Retirement insurance payments, during the previous year. Amounts are expressed in contemporary dollars, and users studying change over time must adjust for inflation.
Income	HHINCOME	Income of Households	The total money income of all household members age 15 years old and over during the previous year. The amount should equal the sum of all household members' individual incomes, as recorded in the person-record variable INCTOT. The persons included were those present in the household at the time of the census or survey. People who lived in the household during the previous year but who were no longer present at census time are not included, and members who did not live in the household during the previous year but who had joined the household by the time of the census or survey, are included. Note that household income differs from family income. The family income variable only reports the incomes of household members related to the head, while HHINCOME includes the incomes of all household members.

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E. Attachments, Attachment E.4. Variable Descriptions for ACS Data to be Used in this Evaluation

Domain	Name	Variable	Description
Income	FTOTINC	Income of Families	The incomes of all members 15 years old and over related to the household head are summed and treated as a single amount. Although the family income statistics cover the past 12 months, the characteristics of individuals and the composition of families refer to the time of interview.
Income	INCTOT	Income of Individuals	Reports each respondent's total pre-tax personal income or losses from all sources for the previous year. The censuses collected information on income received from these sources during the previous CY; for the ACS and the PRCS, the reference period was the past 12 months. Amounts are expressed in contemporary dollars, and users studying change over time must adjust for inflation.
Income	INCWELFR	Pre-tax income from public assistance programs	Reports how much pre-tax income (if any) the respondent received during the previous year from various public assistance programs commonly referred to as "welfare." Assistance from private charities was not included. The censuses collected information on income received from these sources during the previous CY; for the ACS and the PRCS, the reference period was the past 12 months. The following are included within INCWELFR: <ul style="list-style-type: none"> • Federal/State SSI payments to elderly (age 65+), blind, or disabled persons with low incomes. (In the 2000 census, the ACS, and the PRCS, SSI payments are specified in INCSUPP only, not in INCWELFR); • Aid to Families with Dependent Children (AFDC); and • General Assistance (This does not include separate payments for hospital or other medical care).
Income	POVERTY	Poverty Status in the Past 12 Months	Each family's total income for the previous year as a percentage of the poverty thresholds established by the Social Security Administration in 1964 and subsequently revised in 1980, adjusted for inflation. Assigns all members of each family (not each household) the same code. Whether an individual falls below the official "poverty line" depends not only on total family income, but also on the size of the family, the number of people in the family who are children, and the age of the household head (under/over age 65).
Marital Status	MARST	Marital Status	Each individual's marital status, including married, spouse present; married, spouse absent; separated; divorced; widowed; never married/single.
Race	RACE	Race	The racial categories included in the census questionnaire generally reflect a social definition of race recognized in this country and not an attempt to define race biologically, anthropologically, or genetically. Includes white, black/African American, American Indian or Alaskan Native, Chinese, Japanese, other Asian or Pacific Islander, other race, two major races, three or more major races.

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E. Attachments, Attachment E.4. Variable Descriptions for ACS Data to be Used in this Evaluation

Domain	Name	Variable	Description
Residence	MIGCITY1	Residence 1 Year Ago	For respondents who lived in a different residence one year before the survey date, identifies the city of residence at that time, if the prior residence was in an identifiable city. Cities are not directly identified in the source Integrated Public Use Microdata Series (IPUMS) files, so IPUMS bases MIGCITY1 coding on relationships between cities and the Migration Public Use Microdata Areas.
Sex	SEX	Sex	Either "male" or "female."
Work Status	EMPSTAT	Work Status in the Past 12 Months	Whether the respondent was a part of the labor force (e.g., working or seeking work) and, if so, whether the person was currently unemployed.
Work Status	WKSWORK1	Weeks Worked in the Past 12 Months	The number of weeks that the respondent worked for profit, pay, or as an unpaid family worker during the previous year. Weeks of active service in the Armed Forces are also included.
Work Status	UHRSWORK	Usual Hours Worked Per Week Worked in the Past 12 Months	The usual hours worked per week worked in the past 12 months. This question was asked of people 16 years old and over who indicated that they worked during the past 12 months. The respondent was to report the number of hours worked per week in the majority of the weeks he or she worked in the past 12 months. If the hours worked per week varied considerably during the past 12 months, the respondent was to report an approximate average of the hours worked per week.
Work Status	CLASSWKR	Class of Worker	The type of ownership of the employing organization. These categories are: <ol style="list-style-type: none"> 1. An employee of a private for-profit company or business, or of an individual, for wages, salary, or commissions. 2. An employee of a private not-for-profit, tax-exempt, or charitable organization. 3. A local government employee (e.g., city, county). 4. A state government employee. 5. A Federal government employee. 6. Self-employed in own not incorporated business, professional practice, or farm. 7. Self-employed in own incorporated business, professional practice, or farm. 8. Working without pay in a family business or farm.
Work Status	IND	Industry	A 4-digit un-recoded variable reporting the work setting and economic sector, as opposed to the worker's specific technical function, or "occupation." Respondents unsure about this were to report the industry in which they spent the most time. For persons listing more than one industry, the samples use the first one listed. Persons not currently employed were to give their most recent industry.

Indiana 1115(a) Demonstration Evaluation Plan**E. Attachments, Attachment E.4. Variable Descriptions for ACS Data to be Used in this Evaluation**

Domain	Name	Variable	Description
Work Status	OCC	Occupation	The person's primary occupation, coded into a contemporary census classification scheme. Generally, the primary occupation is the one from which the person earns the most money; if respondents were not sure about this, they were to report the one at which they spent the most time. Unemployed persons were to give their most recent occupation. For persons listing more than one occupation, the samples use the first one listed.
Work Status	LABFORCE	Labor Force Status	Participation in the civilian labor force (e.g., working or seeking work) and, if so, whether the person was currently unemployed, or participation in the U.S. Armed Forces (i.e., people on active duty with the United States Army, Air Force, Navy, Marine Corps, or Coast Guard).

F. Analytic Tables

Goal 1: Improve health care access, appropriate utilization, and health outcomes among HIP members

Exhibit F.1: Goal 1⁴⁵

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.1 – Member use of preventive care, primary care, needed prescription drugs, chronic disease management care, and urgent care will be stable during the HIP demonstration period.	<p>Primary RQ 1.1— How has the following changed over time for HIP members?⁴⁶</p> <ul style="list-style-type: none"> Preventive, primary, urgent and specialty care Prescription drug use Chronic care management 	<p>Outcome measures will reflect utilization of the types of service during defined time frame as described in the research question and are anticipated to include for instance based on yearly utilization:</p> <ul style="list-style-type: none"> Proportion of members receiving qualifying preventive care services⁴⁷ Proportion of members using primary care⁴⁸ Proportion of members using specialty care⁴⁹ Enrollment in disease management programs by MCE Adherence to prescription drugs Proportion of members with urgent care visits⁵⁰ Proportion of members with ED visit 	<ul style="list-style-type: none"> Claims data (2015-2020) Annual MCE reporting on enrollment in chronic disease management programs (2015-2020) 	Descriptive quantitative analysis with subgroup analysis	n.a.	<p>Interim Evaluation 2019</p> <p>Summative Evaluation 2022</p>

⁴⁵ For the evaluation, outcome measures will include the time frame component, for example, the proportion of members using primary care within a 6-month period or

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F. Analytic Tables, Goal 1: Improve health care access, appropriate utilization, and health outcomes among HIP members

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.1, continued	Primary RQ 1.1, continued	Proportion of members: <ul style="list-style-type: none"> Receiving breast cancer screening (BCS) Receiving cervical cancer screening (CCS) Receiving adult body mass index assessment (ABA) Controlling high blood pressure (CBP) Receiving comprehensive diabetes care hemoglobin A1c (HbA1c) testing (CDC) On persistent medications that receive annual monitoring (MPM) With an appropriate type of asthma medication (MMA) 	HEDIS data as summarized by health plan in existing Indiana HEDIS reports (2015-2020) ⁵¹	n.a.	n.a.	Interim Evaluation 2019 <i>Note:</i> The Summative Evaluation will not include this outcome measure as the statistical testing that will be performed by service type (above row) is sufficient to respond to this research question.

enrollment in disease management within 12 month. The exact definition of the measures will be included in the Interim and Summative report.

⁴⁶ CMS’ premium-related research question 2.2a (Are beneficiaries with accounts equally likely to receive preventive care, which does not draw down beneficiary accounts, compared to beneficiaries who do not have accounts?) is not included here because all HIP members (HIP Plus and HIP Basic) have accounts. As noted in the Evaluation Plan narrative, non-HIP members vary substantively from HIP members and comparing preventive care use between these two populations is problematic.

⁴⁷ The evaluator anticipates using the Center for Disease Control (CDC) list of preventive care procedures, identified by Current Procedural Terminology (CPT) codes and accompanying diagnosis.

⁴⁸ The evaluator anticipates identifying primary care office and ambulatory care visits using (1) primary care provider specialties and (2) evaluation and management (E&M) procedures, International Classification of Diseases (ICD)-9 and ICD-10 codes, and institutional revenue codes.

⁴⁹ The evaluator anticipates identifying these services using provider specialty.

⁵⁰ The evaluator anticipates identifying these services using the urgent care “Place of Service” code on the professional medical claim in addition to an accompanying ambulatory or outpatient procedure code, diagnosis code or revenue code from the HEDIS® value set directory for “Ambulatory Visits Value Set.”

⁵¹ Indiana’s 2018 HEDIS measures, for example, can be found online at: <https://www.in.gov/fssa/ompp/5534.htm> (accessed May 9, 2019).

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F. Analytic Tables, Goal 1: Improve health care access, appropriate utilization, and health outcomes among HIP members

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.2 – Unnecessary emergency department services will not rise over time for HIP members.	Primary RQ 2.1 – How have avoidable emergency department visits among HIP members changed over time?	Proportion of members with preventable/avoidable emergency department visits in a year ⁵²	Claims data (2015-2020)	Descriptive quantitative analysis; identification of visits based on the New York University (NYU) Emergency Department algorithm	n.a.	Interim Evaluation 2019 Summative Evaluation 2022
		Reported health status <i>Note: Goal 2's research question 3.1 also includes this outcome measure.</i>	BRFSS (2015 – 2020) ⁵⁴	Descriptive quantitative analysis Interrupted time series analysis of health status among likely eligible population in Indiana ⁵⁵	n.a.	Summative Evaluation 2022
H.3 – HIP members will report positive health outcomes.	Primary RQ 3.1 – How has reported health status for HIP members changed over time?	Proportion of members reporting excellent/very good, good, or fair/ poor health	Member Survey and Leaver Survey (2021) ⁵³	Descriptive quantitative analysis across time	n.a.	Summative Evaluation 2022
		Reported health status <i>Note: Goal 2's research question 3.1 also includes this outcome measure.</i>	BRFSS (2015 – 2020) ⁵⁴	Descriptive quantitative analysis Interrupted time series analysis of health status among likely eligible population in Indiana ⁵⁵	n.a.	Summative Evaluation 2022

⁵² The evaluator anticipates using place of service and revenue code to identify emergency department visits.

⁵³ The member survey planned for the Summative Evaluation Report will reflect point in time experience. A longitudinal survey is not possible due to COVID-19 (refer to Section C. Methodology, 1. Data Sources and Collection for additional context).

⁵⁴ BRFSS data does not allow for identification of individuals in the sample enrolled in Medicaid. Additionally, limited availability of fields in BRFSS will limit the ability to identify individuals that are potentially eligible for HIP (low-income (<138% FPL), non-disabled adults aged 19-64; medically frail, TMA participants, and low-income parents and caretakers). As such, analyses will reflect changes among the likely eligible population rather than changes among HIP enrolled members.

⁵⁵ The objective of the hypothesis and the research question is to assess impact of HIP 2018 policy on HIP member health status over time (not as compared to other states). As such, the primary analytic approach will use an interrupted time series to assess changes in HIP member health status over time.

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F. Analytic Tables, Goal 1: Improve health care access, appropriate utilization, and health outcomes among HIP members

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
				Findings from Goal 5, Primary RQ 4.3 difference-in-difference estimation of impact of HIP on member health status compared to Medicaid members in other states	Low-income adults (19-64) enrolled in/eligible for Medicaid in Indiana compared to similar adults during the same time period in states that provide retroactive coverage ⁵⁶	
H.4 – HIP members will report satisfaction with health care access.	Primary RQ 4.1 – What percentage of HIP members report getting health care as soon as needed?	Proportion of members reporting that they access care as soon as needed <i>Note: Survey length constraints will determine how many questions might be asked to determine access by type of service</i>	Member Survey (2021)	Descriptive quantitative analysis	n.a.	Summative Evaluation 2022
	Primary RQ 4.2 – To what extent do HIP members receive coverage through Fast Track and presumptive eligibility policies?	Proportion of members receiving coverage under Fast Track and presumptive eligibility policies, by ranges of months	Enrollment data (2017-2020)	Descriptive quantitative analysis by number of months	n.a.	Interim Evaluation 2019 Summative Evaluation 2022

⁵⁶ Goal 5 primary RQ 4.3 is “Do beneficiaries subject to the retroactive eligibility waiver have better health outcomes than other beneficiaries who have access to retroactive eligibility?” For purposes of this question, we plan to analyze the impact of HIP demonstration using a difference-in-difference estimation technique comparing reported health status of Medicaid covered members in Indiana during same period to states that provide retroactive coverage. HIP 2.0 demonstration included retroactive coverage waiver from its inception in 2015 (this evaluation is for demonstration period 2018-2020). It is to be noted that there is variance in Medicaid program policy, member composition and state healthcare systems and economies across states. Hence, differences in outcome measure using a difference-in-difference approach can be due to multiple reasons that might be inextricably linked. The details associated with the analytics will be included in Goal 5. The Goal 5 RQ 4.3 findings will be leveraged in conjunction with ITS analyses proposed for this research questions to provide a response to primary RQ3.1.

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F. Analytic Tables, Goal 1: Improve health care access, appropriate utilization, and health outcomes among HIP members

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.5 – The Indiana Medicaid enrollment rate will be comparable to other Medicaid expansion states.	Primary RQ 5.1 – How does the Indiana Medicaid coverage rate compare to other Medicaid expansion states?	Proportion of eligible population enrolled in Medicaid	IPUMS ACS data, variables HINSCAID, HCOVANY and HINSCARE (2011-2020)	Difference in differences regression model of eligible population enrolling in Medicaid	Low-income Indiana adults (19-64) enrolled in/eligible for Medicaid from 2016/2017 and 2019/2020 compared to similar adults enrolled in/eligible for Medicaid during the same time period in selected Medicaid expansion states (27) and selected states without a Medicaid expansion (17). The evaluator will assess use of the Medicaid-enrolled versus the Medicaid-eligible population prior to deciding which population to use.	Summative Evaluation 2022

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F. Analytic Tables, Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members, *Not applicable for the Summative Evaluation Report as the State suspended community engagement activities as of April 30, 2020*

Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members

Effective October 31, 2019, the State no longer required members to report their hours. Effective April 30, 2020, the State indefinitely stopped all community engagement activities in response to the COVID-19 public health emergency and the stay in the federal lawsuit involving Indiana Medicaid. Since the State suspended community engagement activities after the submission of the Interim Evaluation Report, this plan addresses the community engagement appendix but community engagement will no longer be evaluated for the Summative Evaluation Report.

Exhibit F.2: Goal 2, Hypothesis 1^{57,58,59}

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.1 – Medicaid beneficiaries subject to community engagement requirements will have higher employment levels than Medicaid beneficiaries not subject to the requirements.	Primary RQ 1.1 – Are HIP members subject to community engagement requirements more likely than other similar Medicaid beneficiaries not subject to these requirements to be employed? ⁶⁰	<ul style="list-style-type: none"> Probability of being employed 	IPUMS ACS data, variable EMPSTAT (2015-2020)	<ul style="list-style-type: none"> ITS analysis of employment among likely eligible population in Indiana 	n.a.	Summative Evaluation 2022

⁵⁷ This hypothesis in the CMS guidance included “[...] including work in subsidized, unsubsidized [...] settings.” This phrase is not included because while the data sources to be used may include this type of employment, the available variables do not provide this level of specificity.

⁵⁸ This table excludes CMS guidance question 1.1c (characteristics of jobs gained) because of limitations in the length of the forthcoming Member Survey.

⁵⁹ For the evaluation, outcome measures will include time frame component, for example, the proportion of members using primary care within a 6-month period or enrollment in disease management within 12 month. The exact definition of the measures will be included in the Interim and Summative report.

⁶⁰ This research question in the CMS guidance included “[...] including new and sustained employment.” This phrase is not included because available ACS data will not allow this level of specificity.

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F. Analytic Tables, Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members, *Not applicable for the Summative Evaluation Report as the State suspended community engagement activities as of April 30, 2020*

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.1, continued	Primary RQ 1.1, continued	<ul style="list-style-type: none"> Probability of being employed 	IPUMS ACS data, variable EMPSTAT (2015-2020)	<ul style="list-style-type: none"> Difference-in-differences regression model of employment among the likely eligible population 	Low-income Indiana adults (19-64) enrolled in Medicaid from 2017/2018 and 2019/2020 compared to similar adults enrolled in Medicaid during same times in select other states without a community engagement requirement	Summative Evaluation 2022

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Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.1, continued	Subsidiary RQ 1.1a – Do HIP members who initially participate in qualifying activities other than employment gain employment within 6 months or one year (i.e., is there evidence of job-readiness progression)? ⁶¹	<ul style="list-style-type: none"> Proportion of members employed at 6 months and 1 year Proportion employed at least 20 hours per week at 1 year⁶² <p><i>Note: Outcome measures used may require adjustment depending on program administrative data received.</i></p>	Program administrative data (2019-2020)	Descriptive analysis of employment status at 6 months and 1 year among those who initially met requirements through non-employment activities	n.a.	Summative Evaluation 2022 ⁶³
		<ul style="list-style-type: none"> Proportion of members meeting community engagement requirement by activity (e.g., employment, education, volunteer work) by year 	<ul style="list-style-type: none"> Monthly program administrative data (2019-2020) Community engagement monitoring metrics (2019-2020) 	Descriptive analysis of changes in qualifying community engagement activities ⁶⁴	n.a.	Summative Evaluation 2022

⁶¹ Indiana does not require beneficiary reporting until July 2019. As such, the timeframe for evaluation of this research question will be less than two years.

⁶² Indiana is phasing in the number of hours required, with 20 hours of activity not required until July 2020. This phase-in limits the evaluation of the 20 hours/week requirement.

⁶³ Data for these time intervals will not be available for the Interim Report because Indiana will not require beneficiary reporting until July 2019. However, it is expected that information on initial reporting will be available for Interim Report (see Implementation Research Questions).

⁶⁴ While CMS’ guidance indicates a quarterly timeframe for this analysis, this analysis is only possible with an annual look-back. Indiana will assess beneficiary compliance with community engagement requirements on an annual basis, specifically in December of each year.

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F. Analytic Tables, Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members, *Not applicable for the Summative Evaluation Report as the State suspended community engagement activities as of April 30, 2020*

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.1, continued	Subsidiary RQ 1.1b – Is employment among individuals subject to community engagement requirements sustained over time, including after separating from Medicaid? ⁶⁵	Proportion of members employed continuously since application of requirements (i.e., has gained employment and kept it as reported at survey time 1 and/or 2) ⁶⁶	<ul style="list-style-type: none"> Longitudinal Member Survey (2020, 2021) Community Engagement Leaver Survey (2021) <p><i>Note: A longitudinal survey approach is no longer appropriate due to COVID-19 (see “Data Sources and Collection” in Section C).</i></p>	<p>Descriptive analysis of sustained employment for those who are employed following application of requirements</p> <p><i>Note: The definition of sustained employment will include keeping the same job or sustaining employment with a number of jobs.</i></p>	n.a.	Summative Evaluation 2022

⁶⁵ This question in the CMS guidance included “[...] over time, for example a year or more [...].” This phrase is not included here because the timeframe will depend on (1) the timing at which a member gained employment and (2) the data source to be used to assess duration of employment.

⁶⁶ The CMS guidance also includes probability of employment spell lasting a certain amount of time and average length of continuous employment as outcome measures. These measures are included below using program administrative data but have been excluded here because the brief nature of the member survey may not permit detailed questioning beyond point-in-time employment.

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Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.1, continued	Subsidiary RQ 1.1b, continued	<p>Proportion of members employed continuously since application of requirements (i.e., has gained employment and kept it at the time of compliance determination at end of year)</p> <p>Probability of an employment spell lasting 3 months (6 months, 1 year) since application of requirements</p> <p>Average length of continuous employment since application of requirements</p> <p><i>Note: Community engagement is self-reported and members can report at end of year or any other time. Data might not be available to analyze continuous enrollment by time. Outcome measures might be revised based on data constraints.</i></p>	Program administrative data (2019, 2020)	<p>Descriptive analysis of sustained employment for those who are employed following application of requirements and remain enrolled in Medicaid</p> <p>Comparison of regression-adjusted means in employment 1-year post-enrollment among:</p> <ol style="list-style-type: none"> 1) those who were already employed 2) those who gained employment in the first 6 months 3) those who did not gain employment in first 6 months⁶⁷ 	n.a.	Summative Evaluation 2022

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Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.1, continued	Primary RQ 1.2 – Is being subject to community engagement requirements associated with increases in educational level? ⁶⁸	Highest grade attained (e.g., high school education or some college)	IPUMS ACS data, variable EDUC (2015-2020)	ITS analysis of education outcomes among the likely eligible population in Indiana	n.a. ⁶⁹	Summative Evaluation 2022
				Difference-in-differences regression model of education outcomes among the likely eligible population	Low-income Indiana adults (19-64) enrolled in Medicaid from 2016/2017 and 2019/2020 ⁷⁰ compared to similar adults enrolled in Medicaid during same times in select other states without a community engagement requirement	Summative Evaluation 2022

⁶⁷ CMS guidance also includes two years post-enrollment. This timeframe is not included because reporting requirements do not take effect until July 2019, which limits the ability to assess employment over the full two CYs of 2019 and 2020.

⁶⁸ The original question in CMS Guidance has been modified to be specific to educational level versus a specific educational achievement, reflecting the definition of IPUMS ACS' "EDUC" variable. The original question was "Is being subject to community engagement requirements associated with changes in education outcomes (either positive or negative), such as achievement of diplomas and certifications?" Outcome measures have been revised accordingly.

⁶⁹ This research question in the CMS guidance included "[...] including new and sustained employment." This phrase is not included because available ACS data will not allow this level of specificity.

⁷⁰ The community engagement requirement took effect in 2019. The pre-period excludes 2018 because Indiana initiated other program changes in 2018 under its waiver.

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F. Analytic Tables, Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members, *Not applicable for the Summative Evaluation Report as the State suspended community engagement activities as of April 30, 2020*

Exhibit F.3: Goal 2, Hypothesis 2⁷¹

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.2 – Community engagement requirements will increase the average income of Medicaid beneficiaries subject to the requirements compared to Medicaid beneficiaries not subject to the requirements.	Primary RQ 2.1 – Do community engagement requirements increase income? ⁷²	Income	IPUMS ACS variables INCTOT and INCWAGE (2015-2020)	ITS analysis of income among the likely eligible population in Indiana	n.a. ⁷³	Summative Evaluation 2022
				Difference-in-differences regression model of income among the likely eligible population	Low-income Indiana adults (19-64) enrolled in Medicaid from 2016/2017 and 2019/2020 ⁷⁴ compared to similar adults enrolled in Medicaid during same times in select other states without a community engagement requirement	Summative Evaluation 2022
		Income, continued	Enrollment data (2015-2020)	Descriptive analysis of change in income among members who remain enrolled in Medicaid, with breakdowns by members exempt from community engagement requirements and members that are not exempt	n.a.	Summative Evaluation 2022

⁷¹ For the evaluation, outcome measures will include time frame component, for example, the proportion of members using primary care within a 6-month period or enrollment in disease management within 12 month. The exact definition of the measures will be included in the Interim and Summative report.

⁷² There are limitations in the ability to attribute impact to the community engagement requirements due to other policy changes that have occurred at a similar time. See Section D, Methodological Limitations, of the Evaluation Plan.

⁷³ This research question in the CMS guidance included “[...] including new and sustained employment.” This phrase is not included because available ACS data will not allow this level of specificity.

⁷⁴ The community engagement requirement took effect in 2019. The pre-period excludes 2018 because Indiana initiated other program changes in 2018 under the waiver renewal.

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F. Analytic Tables, Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members, *Not applicable for the Summative Evaluation Report as the State suspended community engagement activities as of April 30, 2020*

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.2, continued	Subsidiary RQ 2.1a – Do community engagement requirements change income from public assistance programs? ⁷⁵	Income from public assistance programs	IPUMS ACS variables INCWELFR (2015-2020)	ITS analysis of income receipt from public assistance among the likely eligible population	n.a. ⁷⁶	Summative Evaluation 2022
				Difference-in-differences regression model of income receipt from public assistance among the likely eligible population	Low-income Indiana adults (19-64) enrolled in Medicaid from 2016/2017 and 2019/2020 ⁷⁷ compared to similar adults enrolled in Medicaid during same times in select other states without a community engagement requirement	Summative Evaluation 2022
	Subsidiary RQ 2.1b – Are changes in income sustained over time, including after separating from Medicaid? ⁷⁸	Proportion of members who report higher or lower income	<ul style="list-style-type: none"> Enrollment data All Leaver Surveys (Community Engagement, non-payment of POWER Account Contribution, increase in income) (2021) 	Descriptive analysis of sustained income changes over time, by data source	n.a.	Summative Evaluation 2022

⁷⁵ The original CMS question is slightly modified since the available ACS variable measure (INCWELFR) is specific to public assistance income. There are also limitations in the ability to attribute impact to the community engagement requirements due to other policy changes that have occurred at a similar time. See Section D, Methodological Limitations, of the Evaluation Plan.

⁷⁶ This research question in the CMS guidance included “[...] including new and sustained employment.” This phrase is not included because available ACS data will not allow this level of specificity.

⁷⁷ The community engagement requirement took effect in 2019. The pre-period excludes 2018 because Indiana initiated other program changes in 2018 under the waiver renewal.

⁷⁸ This question in the CMS guidance included “[...] over time, for example a year or more [...].” This phrase is not included here because the timeframe will depend on (1) the timing at which a member’s income changes and (2) the data source to be used to assess duration of changed income.

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F. Analytic Tables, Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members, *Not applicable for the Summative Evaluation Report as the State suspended community engagement activities as of April 30, 2020*

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.2, continued	Subsidiary RQ 2.1b, continued	Proportion of members with sustained higher income	Enrollment data (2015-2020)	Descriptive analysis of income over time among members subject to requirements and who remain enrolled in Medicaid	n.a.	Summative Evaluation 2022
	Subsidiary RQ 2.1c – To what extent is community engagement associated with an increase in the number of HIP members transitioning off Medicaid because they are no longer income eligible for Medicaid? ⁷⁹	Probability of disenrollment due to income	Monthly disenrollment data (2019 and 2020) – note this data does not indicate whose income changed in the household	Comparison of regression-adjusted disenrollment rates among: <ul style="list-style-type: none"> • Members meeting community engagement requirement through employment • Members meeting community engagement requirement through other activities • Exempt members 	n.a.	Summative Evaluation 2022

⁷⁹ This question in the CMS guidance was phrased “[...] income increases resulting from [...].” This question has been revised because multiple program changes have occurred along with the implementation of community engagement requirements, creating limitations in the ability to attribute impact to the community engagement requirements.

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F. Analytic Tables, Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members, *Not applicable for the Summative Evaluation Report as the State suspended community engagement activities as of April 30, 2020*

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.2., continued	Subsidiary RQ 2.1d – To what extent is community engagement associated with households transitioning off other public programs like SNAP or TANF? ⁸⁰	Probability of receiving income from public assistance programs	IPUMS ACS variable INCWELFR (2015-2020)	Regression model of income receipt from public assistance among the likely eligible population	n.a. ⁸¹	Summative Evaluation 2022
				Difference-in-differences regression model of income receipt from public assistance among the likely eligible population	Low-income Indiana adults (19-64) enrolled in Medicaid from 2016/2017 and 2019/2020 ⁸² compared to similar adults enrolled in Medicaid during same times in select other states without a community engagement requirement	Summative Evaluation 2022

⁸⁰ This question in the CMS guidance was phrased “[...] income increases resulting from [...].” This question has been revised because multiple program changes have occurred along with the implementation of community engagement requirements. As such, there are limitations in the ability to attribute impact to the community engagement requirements.

⁸¹ This research question in the CMS guidance included “[...] including new and sustained employment.” This phrase is not included because available ACS data will not allow this level of specificity.

⁸² The community engagement requirement took effect in 2019. The pre-period excludes 2018 because Indiana initiated other program changes in 2018 under the waiver renewal.

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F. Analytic Tables, Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members, *Not applicable for the Summative Evaluation Report as the State suspended community engagement activities as of April 30, 2020*

Exhibit F.4: Goal 2, Hypothesis 3^{83,84} and Hypothesis 4

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.3 – Community engagement requirements will improve the health outcomes of current and former Medicaid beneficiaries subject to the requirements, compared to Medicaid beneficiaries not subject to the requirements.	Primary RQ 3.1 – Are community engagement requirements associated with improved health outcomes for beneficiaries subject to the requirements? ⁸⁵	Reported health status	BRFSS (2015-2018) ⁵⁴	ITS analysis of self-reported health status among likely eligible population	n.a. ⁸⁶	Summative Evaluation 2022
				Difference-in-differences regression model of self-reported health status among likely eligible population <i>Note: To be determined based on sample sizes and policy changes in other states.</i>	Low-income Indiana adults (19-64) likely eligible for Medicaid from 2016/2017 and 2019/2020 ⁸⁷ compared to similar adults during same times in select other states without a community engagement requirement	Summative Evaluation 2022

⁸³ This is Hypothesis 4 in CMS Guidance. Hypothesis 3 is not included in this Evaluation Plan but Goal 2, RQ 4 assesses whether or not disenrolled individuals have an employer offer and if they have enrolled in employer-based coverage.

⁸⁴ For the evaluation, outcome measures will include time frame component, for example, the proportion of members using primary care within a 6-month period or enrollment in disease management within 12 month. The exact definition of the measures will be included in the Interim and Summative report.

⁸⁵ This question in the CMS guidance was phrased “[...] lead to [...]?” This question has been revised because multiple program changes have occurred along with the implementation of community engagement requirements. As such, there are limitations in the ability to attribute impact to the community engagement requirements.

⁸⁶ This research question in the CMS guidance included “[...] including new and sustained employment.” This phrase is not included because available ACS data will not allow this level of specificity.

⁸⁷ The community engagement requirement took effect in 2019. The pre-period excludes 2018 because Indiana initiated other program changes in 2018 under the waiver renewal.

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F. Analytic Tables, Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members, *Not applicable for the Summative Evaluation Report as the State suspended community engagement activities as of April 30, 2020*

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.3, continued	Subsidiary RQ 3.1a – What are the trajectories of HIP member health status over time, including after separation from Medicaid?	Reported health status	Longitudinal Member Survey (2020, 2021), which will follow members over time and will include individuals who are no longer eligible for Medicaid <i>Note: A longitudinal survey approach is no longer appropriate due to COVID-19 (see “Data Sources and Collection” in Section C).</i>	Descriptive analysis of health status over time among members who are required to report activities.	n.a.	Summative Evaluation 2022
	Subsidiary RQ 3.1b – Is disenrollment for noncompliance with community engagement requirements associated with differences in health outcomes?	Reported health status	Longitudinal Member Survey (2020, 2021), which will follow members over time and will include individuals who are no longer eligible for Medicaid <i>Note: A longitudinal survey approach is no longer appropriate due to COVID-19 (see “Data Sources and Collection” in Section C).</i>	Descriptive analyses of self-reported health status (and regression-adjusted means as viable) among members initially subject to requirement who were disenrolled for noncompliance ⁸⁸	Members initially subject to requirement who remain enrolled Members initially subject to requirement who are disenrolled for other reasons	Summative Evaluation 2022

⁸⁸ The evaluator will perform the regression analysis as sample size permits.

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F. Analytic Tables, Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members, *Not applicable for the Summative Evaluation Report as the State suspended community engagement activities as of April 30, 2020*

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.4 – HIP policies including community engagement and required payment policies increase the likelihood that Medicaid beneficiaries transition to commercial health insurance after separating from Medicaid, compared to Medicaid beneficiaries not subject to the requirements.	Primary RQ 4.1 – What are the coverage outcomes of individuals who separate from HIP, by separation reason?	Proportion of previous HIP members with employer-sponsored insurance (ESI), Marketplace coverage, and no coverage.	<ul style="list-style-type: none"> All Leaver Surveys (Community Engagement, non-payment of POWER Account Contribution, increase in income) (2021) Longitudinal Member Survey (2021) <p><i>Note: A longitudinal survey approach is no longer appropriate due to COVID-19 (see “Data Sources and Collection” in Section C).</i></p>	Descriptive analysis of sources of coverage for previous members, by disenrollment reason and survey source (cannot combine results from longitudinal survey and the Leaver Surveys)	n.a.	Summative Evaluation 2022

Indiana 1115(a) Demonstration Evaluation Plan

F. Analytic Tables, Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members, *Not applicable for the Summative Evaluation Report as the State suspended community engagement activities as of April 30, 2020*

Exhibit F.5: Goal 2, Implementation Research Questions⁸⁹

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
n.a.	Primary RQ 5 – To what extent do individuals subject to community engagement requirements who become ineligible for Medicaid due to an increase in income obtain health insurance coverage? ⁹⁰	<ul style="list-style-type: none"> Proportion of members disenrolled who received offer of ESI Proportion of members disenrolled who have enrolled in commercial coverage, including ESI and individual market/Marketplace plans 	<ul style="list-style-type: none"> All Leaver Surveys (Community Engagement, non-payment of POWER Account Contribution, income) (2021) Longitudinal Member Survey (2020, 2021), which will follow members over time and will include individuals who are no longer eligible for Medicaid <p><i>Note: A longitudinal survey approach is no longer appropriate due to COVID-19 (see “Data Sources and Collection” in Section C).</i></p>	Descriptive quantitative analysis of health insurance coverage changes among disenrolled members	n.a.	Summative Evaluation 2022
	Primary RQ 6 – What is the distribution of activities HIP members engage in to meet community engagement requirements?	Number/proportion of members reporting each qualifying activity, by year	Monthly program administrative data (2019-2020)	Descriptive quantitative analysis of qualifying activities	n.a.	Interim Evaluation 2019 Summative Evaluation 2022

⁸⁹ For the evaluation, outcome measures will include time frame component, for example, the proportion of members using primary care within a 6-month period or enrollment in disease management within 12 month. The exact definition of the measures will be included in the Interim and Summative report.

⁹⁰ This question was not included in Table 2 of CMS guidance (“Suggested measures, data sources, and analytic approaches for implementation research questions”) but has been added to provide context around employer-sponsored insurance (ESI).

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F. Analytic Tables, Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members, *Not applicable for the Summative Evaluation Report as the State suspended community engagement activities as of April 30, 2020*

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
n.a.	Subsidiary RQ 6a – How do activity patterns change over time?	Number/proportion of members reporting each qualifying activity, by year	Monthly program administrative data (2019-2020)	Descriptive quantitative analysis of monthly or quarterly trends of qualifying activities (Interim and Summative Report, respectively)	n.a.	Interim Evaluation 2019 Summative Evaluation 2022
	Primary RQ 7 – Do HIP members subject to community engagement requirements understand the requirements, including how to satisfy them and the consequences of noncompliance?	Themes related to understanding of requirements	<ul style="list-style-type: none"> Key informant interviews with State staff, providers, MCE and members (2019, 2020, 2021) 	Descriptive qualitative analysis of member knowledge of community engagement requirements and consequences of non-compliance	n.a.	Interim Evaluation 2019 Summative Evaluation 2022

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F. Analytic Tables, Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members, *Not applicable for the Summative Evaluation Report as the State suspended community engagement activities as of April 30, 2020*

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
n.a.	Primary RQ 7, continued	Proportion of members aware of current community engagement reporting requirements	<ul style="list-style-type: none"> Longitudinal Member Survey (2020, 2021) <i>Note: A longitudinal survey approach is no longer appropriate due to COVID-19 (see “Data Sources and Collection” in Section C).</i>	Descriptive quantitative analysis of member knowledge of community engagement requirements and consequences of non-compliance among members required to report activities – across time	n.a.	Summative Evaluation 2022
	Primary RQ 8 – What are common barriers to compliance with community engagement requirements?	Themes related to barriers to compliance	Key informant interviews with State staff, providers, MCE staff, and members (2019, 2020, 2021)	Descriptive qualitative analysis of barriers to compliance with community engagement	n.a.	Interim Evaluation 2019
	Primary RQ 8, continued	Proportion of members reporting barriers to compliance	<ul style="list-style-type: none"> Community Engagement Leaver Survey (2021) Longitudinal Member Survey (2020, 2021) <i>Note: A longitudinal survey approach is no longer appropriate due to COVID-19 (see “Data Sources and Collection” in Section C).</i>	Descriptive quantitative analysis of barriers to compliance with community engagement among those required to report activities	n.a.	Summative Evaluation 2022

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F. Analytic Tables, Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members, *Not applicable for the Summative Evaluation Report as the State suspended community engagement activities as of April 30, 2020*

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
n.a.	Primary RQ 9 – Do HIP members subject to community engagement requirements report that they received supports needed to participate, such as links to volunteer opportunities or job and education resources? ⁹¹	Themes regarding supports that are provided or arranged by MCEs	<ul style="list-style-type: none"> • Key informant interviews with members (2020, 2021) 	Descriptive quantitative analysis of supports received to support compliance with community engagement among members required to report activities	n.a.	Summative Evaluation 2022

⁹¹ The examples of supports have been revised from the CMS guidance to reflect supports to be provided in Indiana.

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F. Analytic Tables, Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members, *Not applicable for the Summative Evaluation Report as the State suspended community engagement activities as of April 30, 2020*

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
n.a.	Primary RQ 10 – What is the distribution of HIP members who are exempt, meeting the requirement through current work at 20 hours a week or more, or required to report qualified activities to maintain status? What is the distribution of exemption types and sources? ⁹²	<ul style="list-style-type: none"> • Number/proportion of members with exemption during year by exemption type • Number/proportion of members meeting requirement through current work (20 hours/week) during year • Number/proportion of members required to report activities during year 	Monthly program administrative data (2019, 2020)	Descriptive quantitative analysis	n.a.	Interim Evaluation 2019 Summative Evaluation 2022
	Subsidiary RQ 10a – What strategies has the State pursued to reduce HIP member reporting burden, such as matching to State or MCE databases?	State strategies for reducing reporting burden	Interviews with State Medicaid and MCE staff (2019, 2020, 2021)	Descriptive qualitative analysis	n.a.	Interim Evaluation 2019 Summative Evaluation 2022

⁹² This question in the CMS guidance was phrased “How many beneficiaries are required to actively report their status, including exemptions, good cause circumstances, and qualifying activities?” This question is revised to reflect the program administrative data to be available; data are available to identify members that have received good cause exemptions.

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F. Analytic Tables, Goal 2: Increase community engagement leading to sustainable employment and improved health outcomes among HIP members, *Not applicable for the Summative Evaluation Report as the State suspended community engagement activities as of April 30, 2020*

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
n.a.	Primary RQ 11 – What is the distribution of reasons for disenrollment among HIP members?	Number/proportion of members disenrolled for noncompliance, for being over-income, or other reasons, by year	Monthly program administrative data (2019, 2020)	Descriptive quantitative analysis of disenrollment among members required to report activities	n.a.	Interim Report 2019 (disenrollment for reasons other than non-compliance with community engagement activities) ⁹³ Summative Evaluation 2022
	Primary RQ 12 – Are HIP members who are disenrolled for noncompliance with community engagement requirements more or less likely to re-enroll than members who disenroll for other reasons?	Probability of re-enrolling in Medicaid after a gap in coverage of at least 1 month (3 months)	Monthly program administrative data (2019, 2020)	Comparison of regression-adjusted probability of re-enrollment among members initially subject to the community engagement requirement who were: 1) disenrolled for noncompliance 2) disenrolled for reasons other than noncompliance	n.a.	Summative Evaluation 2022

⁹³ Because Indiana will not be assessing compliance with community engagement requirements until December 2019, data on this reason for disenrollment will not be available for the Interim Report.

Indiana 1115(a) Demonstration Evaluation Plan

F. Analytic Tables, Goal 3: Reduce tobacco use among HIP members, through a premium surcharge and the utilization of tobacco cessation benefits

Goal 3: Reduce tobacco use among HIP members, through a premium surcharge and the utilization of tobacco cessation benefits

Exhibit F.6: Goal 3⁹⁴

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.1 – The tobacco premium surcharge will increase use of tobacco cessation services among HIP members.	Primary RQ 1.1 – What impact has the tobacco premium surcharge had on the use of tobacco cessation benefits for HIP members?	Proportion of members using tobacco cessation services by year	Member Survey (2021)	Descriptive quantitative analysis	n.a.	Summative Evaluation 2022
			Claims data (2015-2020)	ITS analysis of tobacco cessation services among likely eligible population in Indiana	n.a. ⁹⁵	Summative Evaluation 2022

⁹⁴ For the evaluation, outcome measures will include time frame component, for example, the proportion of members using primary care within a 6-month period or enrollment in disease management within 12 month. The exact definition of the measures will be included in the Interim and Summative report.

⁹⁵ CMS’s guidance outlined several possible within-state comparison groups, which are not possible for this evaluation due to specific aspects of Indiana HIP. HIP does not involve random assignment to the tobacco surcharge, and Indiana has not staged implementation based on beneficiary characteristics. For these reasons, this Evaluation Plan focuses on an interrupted time series analysis of outcomes within Indiana.

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F. Analytic Tables, Goal 3: Reduce tobacco use among HIP members, through a premium surcharge and the utilization of tobacco cessation benefits

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.1, continued	Subsidiary RQ 1.1a – Do HIP members understand the premium surcharge policy?	Themes related to member knowledge of surcharge	Key informant interviews with members (2019, 2020)	Descriptive qualitative analysis	n.a.	Interim Evaluation 2019
		Proportion of members who are tobacco users and report knowledge of the premium surcharge	Member Survey (2021)	Descriptive quantitative analysis on proportion of tobacco users reporting knowledge of premium surcharge.	n.a.	Summative Evaluation 2022
	Subsidiary RQ 1.1b – Do HIP members know about the cessation services offered through HIP?	Themes related to member knowledge of cessation services offered through HIP	Key informant interviews with members (2019, 2020)	Descriptive qualitative analysis	n.a.	Interim Evaluation 2019 Summative Evaluation 2022
		Proportion of members who are tobacco users and report knowledge of cessation services offered through HIP	Member Survey (2021)	Descriptive quantitative analysis	n.a.	Summative Evaluation 2022

Indiana 1115(a) Demonstration Evaluation Plan

F. Analytic Tables, Goal 3: Reduce tobacco use among HIP members, through a premium surcharge and the utilization of tobacco cessation benefits

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.1, continued	Subsidiary RQ 1.1c – Are HIP members satisfied with tobacco cessation services?	Themes related to satisfaction with tobacco cessation services	Key informant interviews with members, providers, MCEs and State officials (2019, 2020 and 2021)	Descriptive qualitative analysis	n.a.	Interim Evaluation 2019 Summative Evaluation 2022
		Themes related to reasons for nonparticipation in cessation services	Key informant interviews with members, providers, MCEs, and State officials (2019, 2020, 2021)	Descriptive qualitative analysis	n.a.	Interim Evaluation 2019 Summative Evaluation 2022
H.2 – The tobacco premium surcharge and availability of tobacco cessation benefits will decrease tobacco use.	Primary RQ 2.1 – Has tobacco use decreased among the target population?	Proportion of members using tobacco by year	<ul style="list-style-type: none"> Member Survey (2021) State administrative data (2018-2020) 	Quantitative descriptive analyses of proportion of respondents identifying as using tobacco across time. <i>Note: Analyses based on member survey data will provide a point in time estimate. Analyses of use across time will be based on State administrative data.</i>	n.a.	Summative Evaluation 2022

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F. Analytic Tables, Goal 4: Promote member understanding and increase compliance with payment requirements by changing the monthly POWER Account payment requirement to a tiered structure

Goal 4: Promote member understanding and increase compliance with payment requirements by changing the monthly POWER Account payment requirement to a tiered structure

Exhibit F.7: Goal 4^{96,97,98}

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.1 – HIP’s new income tier structure for POWER Account Contributions will be clear to HIP members. ⁹⁹	Primary RQ 1.1 – Do HIP members with POWER account payment requirements understand their payment obligations?¹⁰⁰ <i>Note: Goal 5, H.1, RQ 1.2 also addresses this question.</i>	Themes regarding member understanding of payment obligations	Key informant interviews with members, providers, MCEs, and State officials (2019, 2020, 2021)	Descriptive qualitative analysis	n.a.	Interim Evaluation 2019 Summative Evaluation 2022
		Proportion of members who are knowledgeable of payment obligations	Member Survey (2021)	Descriptive quantitative analysis	n.a.	Summative Evaluation 2022

⁹⁶ To evaluate HIP’s new tiered POWER account payment structure, CMS’s evaluation guidance for premium and account payments has been consulted. Some of CMS’s hypotheses and research questions within this guidance have been excluded or reworded because they pertain to impact of premium accounts in general and not to Indiana’s new tiered structure, which involves multiple payment amounts. CMS items that have been excluded for this reason are research questions 3.1 and 3.2. Items that have been retained but reworded are noted in this document.

⁹⁷ For the purposes of this goal, Indiana has operationalized efficient use of health care services as continuity in coverage. For this reason, Hypothesis 2 and affiliated research questions from CMS’s guidance is not included. However, Indiana’s Goal 1 includes an analysis of health care utilization under the HIP program.

⁹⁸ For the evaluation, outcome measures will include time frame component, for example, the proportion of members using primary care within a 6-month period or enrollment in disease management within 12 month. The exact definition of the measures will be included in the Interim and Summative report.

⁹⁹ This hypothesis differs from Hypothesis 1 in CMS’s evaluation guidance for premiums and account payments, which states “Beneficiaries who are required to make premium payments, including beneficiary account contributions, will gain familiarity with a common feature of commercial health insurance.” This change more closely aligns the hypothesis with Indiana’s stated goal and with the research questions included to address this hypothesis.

¹⁰⁰ CMS’s research question 1.1 (“Do beneficiaries with premium or beneficiary account payment requirements understand their payment obligations?”) has been reworded slightly to reflect the Indiana policy.

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F. Analytic Tables, Goal 4: Promote member understanding and increase compliance with payment requirements by changing the monthly POWER Account payment requirement to a tiered structure

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.1, continued	Subsidiary RQ 1.1a - Do HIP members that are subject to POWER Account payment requirements have different disenrollment compared to other HIP members?	Proportion of members who disenroll overall, and by: <ul style="list-style-type: none"> Plan type (Basic versus Plus) Under and over 100% of the FPL for HIP Plus members HIP Plus with and without medically frail status 	Enrollment data (2015-2020)	Descriptive quantitative analyses across time for disenrollment overall and by relevant reason codes, and by: <ul style="list-style-type: none"> Plan type Under and over 100% of the FPL for HIP Plus members HIP Plus with and without medically frail status Interrupted time series analyses of disenrollment pre and post 2018 – evaluator will develop approach based on results of descriptive analyses.	n.a.	Summative Evaluation 2022

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F. Analytic Tables, Goal 4: Promote member understanding and increase compliance with payment requirements by changing the monthly POWER Account payment requirement to a tiered structure

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.1, continued	Primary RQ 1.2 – Do HIP members with POWER account payment requirements who initiate payments continue to make regular payments throughout their 12-month enrollment period? ¹⁰¹	<ul style="list-style-type: none"> Proportion of members with payment obligations who make a contribution before end of grace period by year Proportion of members with payment obligations who are disenrolled due to non-payment by year¹⁰² Proportion of members that moved from HIP Plus to HIP Basic due to nonpayment by year 	Enrollment data (2015-2020)	Descriptive quantitative analysis	n.a.	Interim Evaluation 2019 Summative Evaluation 2022

¹⁰¹ CMS’s research question 1.2 (“Do beneficiaries with premium or beneficiary account obligations who initiate payments continue to make regular payments throughout their 12-month enrollment periods?”) has been reworded slightly to reflect the Indiana policy.

¹⁰² Disenrollment reason 001 is “Nonpayment of Initial POWER Account Contribution (PAC) (i.e., never fully enrolled in HIP Plus).” Disenrollment reason 002 is “Nonpayment of PAC (i.e., disenrolled from HIP Plus WITH 6 month lockout).” Disenrollment reason 003 is “Increased Income + Nonpayment of PAC (i.e., disenrolled from HIP Basic WITHOUT 6 month lockout).”

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F. Analytic Tables, Goal 4: Promote member understanding and increase compliance with payment requirements by changing the monthly POWER Account payment requirement to a tiered structure

Exhibit F.8: Goal 4, Hypothesis 2¹⁰³

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.2 – Enrollment and enrollment continuity will vary for the POWER Account payment tiers. ¹⁰⁴	Primary RQ 2.1 – Is there a relationship between POWER Account payment tiers and total and new enrollment in Medicaid? ¹⁰⁵	Reported enrollment in Medicaid among the likely eligible population (take-up)	IPUMS ACS, variable HINSAID (2015-2020)	Descriptive analysis by income level ¹⁰⁶	n.a.	Summative Evaluation 2022
			IPUMS ACS, variable HINSAID (2015-2020) ¹⁰⁷	Interrupted time series analyses of enrollment pre and post 2018 ¹⁰⁸	n.a. ¹⁰⁹	Summative Evaluation 2022
		<ul style="list-style-type: none"> Number of individuals enrolled in Medicaid annually Number of new enrollees in Medicaid annually 	Enrollment data (2015-2020)	Descriptive analysis of enrollment	n.a.	Interim Evaluation 2019 Summative Evaluation 2022

¹⁰³ For the evaluation, outcome measures will include time frame component, for example, the proportion of members using primary care within a 6-month period or enrollment in disease management within 12 month. The exact definition of the measures will be included in the Interim and Summative report.

¹⁰⁴ This hypothesis in the CMS guidance was phrased “Premium requirements, including beneficiary account contributions, will reduce the likelihood of enrollment and enrollment continuity.” This hypothesis has been revised to focus on the new POWER account tiered structure. In addition, multiple program changes have occurred along with the implementation of the tiered structure and there are limitations in the ability to attribute impact to the change in beneficiary account payment amount.

¹⁰⁵ This question is research question 3.3 in the CMS guidance for premiums and account payments. It has been reworded slightly to reflect the Indiana policy.

¹⁰⁶ Initial analyses of the data indicate sufficient sample size by income level within Indiana.

¹⁰⁷ This analysis will leverage data from 2015 to 2020 for Medicaid uptake. Enrollment in 2019 and onwards can be impacted by other policy changes that have taken/will take effect in 2019 and 2020. Enrollment in 2020 may also be affected by the COVID-19 public health emergency.

¹⁰⁸ Evaluator will explore the appropriateness of the model based on the ability to control for differences in beneficiary characteristics between the two years. If resources permit, the evaluator will also explore the combined use of ACS and enrollment data to examine take-up rate on a monthly basis using a regression discontinuity design to examine results at different tier cutoffs in income.

¹⁰⁹ CMS’s guidance outlined several possible within-state comparison groups, which are not possible for this evaluation due to specific aspects of Indiana HIP. Indiana has not staged implementation of the tiered payment structure based on beneficiary characteristics. For this reason, this Evaluation Plan focuses on alternative analyses of outcomes within Indiana.

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F. Analytic Tables, Goal 4: Promote member understanding and increase compliance with payment requirements by changing the monthly POWER Account payment requirement to a tiered structure

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.2, continued	Primary RQ 2.2 – Is there a relationship between POWER Account payment tiers and continued enrollment in Medicaid? ¹¹⁰	Probability of disenrollment due to non-payment ¹¹¹	Enrollment data (2015-2020)	Descriptive quantitative analysis of disenrollment	n.a.	Interim Evaluation 2019 Summative Evaluation 2022
			Enrollment data (2015-2020) ¹¹²	Regression model of outcome controlling for enrollment year ¹¹³	n.a. ¹¹⁴	Interim Evaluation 2019 Summative Evaluation 2022
		Probability of moving from HIP Plus to Basic	Enrollment data (2015-2020)	Descriptive analysis of movement to Basic	n.a.	Interim Evaluation 2019 Summative Evaluation 2022
			Enrollment data (2015-2020) ¹¹⁵	Regression model of outcome controlling for enrollment year ¹¹⁶	n.a. ¹¹⁷	Interim Evaluation 2019 Summative Evaluation 2022

¹¹⁰ This question is research question 3.4 in the CMS guidance for premiums and account payments: “Is there a relationship between payment amounts and continued enrollment in Medicaid, as reflected by mid-year disenrollments and renewal decisions?” It has been reworded to reflect the Indiana policy and the outcomes identified.

¹¹¹ Disenrollment reason 001 is “Nonpayment of Initial PAC (i.e., never fully enrolled in HIP Plus).” Disenrollment reason 002 is “Nonpayment of PAC (i.e., disenrolled from HIP Plus WITH 6 month lockout).” Disenrollment reason 003 is “Increased Income + Nonpayment of PAC (i.e., disenrolled from HIP Basic WITHOUT 6 month lockout).”

¹¹² This analysis will leverage available data (2015 – 2020) to account for the trend in disenrollment across time, even prior to 2018 implementation of POWER Account tiered payment, due to other policy or program changes.

¹¹³ Prior to implementing these analyses, comparability in samples between the two periods will be assessed. Evaluator will explore the appropriateness of the model based on the ability to control for differences in beneficiary characteristics between the two years.

¹¹⁴ CMS’s guidance outlined several possible within-state comparison groups, which are not possible for this evaluation due to specific aspects of Indiana HIP. Indiana has not staged implementation of the tiered payment structure based on beneficiary characteristics. For this reason, this Evaluation Plan focuses on alternative analyses of outcomes within Indiana.

¹¹⁵ This analysis will leverage available data (2015 – 2020) to account for trend in disenrollment across time, even prior to 2018 implementation of POWER Account tiered payment, due to other policy or program changes.

¹¹⁶ Prior to implementing these analyses, the evaluator will assess comparability in samples between the two periods. Evaluator will explore the appropriateness of the model based on the ability to control for differences in beneficiary characteristics between the two years.

¹¹⁷ CMS’s guidance outlined several possible within-state comparison groups, which are not possible for this evaluation due to specific aspects of Indiana HIP. Indiana has not

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F. Analytic Tables, Goal 4: Promote member understanding and increase compliance with payment requirements by changing the monthly POWER Account payment requirement to a tiered structure

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.2, continued	Primary RQ 2.2, continued	Probability of moving from HIP Basic to Plus	Enrollment data (2015-2020)	Descriptive analysis of movement to Plus	n.a.	Interim Evaluation 2019 Summative Evaluation 2022
			Enrollment data (2015-2020) ¹¹⁸	Regression model of outcome controlling for enrollment year ¹¹⁹	n.a. ¹²⁰	Interim Evaluation 2019 Summative Evaluation 2022
		Number of months with Medicaid coverage during year	Enrollment data (2015-2020)	Descriptive analysis of coverage months	n.a.	Interim Evaluation 2019 Summative Evaluation 2022
			Enrollment data (2015-2018) ¹²¹	Regression model of outcome controlling for enrollment year ¹²²	n.a. ¹²³	Summative Evaluation 2022

staged implementation of the tiered payment structure based on beneficiary characteristics. For this reason, this Evaluation Plan focuses on alternative analyses of outcomes within Indiana.

¹¹⁸ This analysis will leverage available data (2015 – 2020) to account for trend in disenrollment across time, even prior to 2018 implementation of POWER Account tiered payment, due to other policy or program changes.

¹¹⁹ Prior to implementing these analyses, the evaluator will assess comparability in samples between the two periods. Evaluator will explore the appropriateness of the model based on the ability to control for differences in beneficiary characteristics between the two years.

¹²⁰ CMS’s guidance outlined several possible within-state comparison groups, which are not possible for this evaluation due to specific aspects of Indiana HIP. Indiana has not staged implementation of the tiered payment structure based on beneficiary characteristics. For this reason, this Evaluation Plan focuses on alternative analyses of outcomes within Indiana.

¹²¹ This analysis will leverage available data (2015 – 2020) to account for trend in disenrollment across time, even prior to 2018 implementation of POWER Account tiered payment, due to other policy or program changes.

¹²² Prior to implementing these analyses, the evaluator will assess comparability in samples between the two periods. The evaluator will explore the appropriateness of the model based on the ability to control for differences in beneficiary characteristics between the two years.

¹²³ CMS’s guidance outlined several possible within-state comparison groups, which are not possible for this evaluation due to specific aspects of Indiana HIP. Indiana has not staged implementation of the tiered payment structure based on beneficiary characteristics. For this reason, this Evaluation Plan focuses on alternative analyses of

Indiana 1115(a) Demonstration Evaluation Plan

F. Analytic Tables, Goal 4: Promote member understanding and increase compliance with payment requirements by changing the monthly POWER Account payment requirement to a tiered structure

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.2, continued	Primary RQ 2.3 – Do HIP members who receive rollover have greater coverage continuity than HIP members who do not receive rollover? ¹²⁴	<ul style="list-style-type: none"> • Number of months with Medicaid coverage • Probability of disenrollment 	Enrollment data (2018-2020)	Regression model of outcomes controlling for enrollment year	Members who do not receive rollover	Summative Evaluation 2022

outcomes within Indiana.

¹²⁴ This is a state-specific question that is not included in CMS guidance.

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F. Analytic Tables, Goal 5: Ensure HIP program policies align with commercial policies, are understood by members, and promote positive member experience and minimize coverage gaps

Goal 5: Ensure HIP program policies align with commercial policies, are understood by members, and promote positive member experience and minimize coverage gaps

Exhibit F.9: Goal 5^{125,126}

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.1 – Beneficiaries subject to HIP policies will understand program policies. ¹²⁷	Primary RQ 1.1 – Are HIP members knowledgeable about policies on payment of POWER Account Contributions, preventive care and rollover? ¹²⁸	Proportion of members who are knowledgeable about HIP policies related to payment of POWER Account Contributions Themes related to knowledge of POWER Account Contributions, preventive care and rollover	<ul style="list-style-type: none"> Member Survey (2021) Program administrative data (2017-2020) Key informant interview with members (2019, 2020, 2021) 	Descriptive quantitative and qualitative analysis (depending on data source)	n.a.	Summative Evaluation 2022

¹²⁵ Indiana does not have specific goals regarding non-eligibility periods. Furthermore, due to budget constraints and concerns about beneficiary burden, the member survey planned for the evaluation is limited in size, and Indiana has prioritized other topics for this survey. However, for Indiana’s Goal 5, CMS’ evaluation guidance for non-eligibility periods was reviewed and this Evaluation Plan includes research questions that are applicable to the State’s goal that fall within the evaluation scope. Specifically, CMS questions related to beneficiary understanding of and experiences with these policies have been included. The hypotheses and research questions from CMS guidance that have been omitted are Hypothesis 1 (1.1, 1.1c), Hypothesis 2 (2.1, 2.1a-2.1d), and Hypothesis 3 (3.1, 3.1a, 3.1b).

¹²⁶ For the evaluation, outcome measures will include time frame component, for example, the proportion of members using primary care within a 6-month period or enrollment in disease management within 12 month. The exact definition of the measures will be included in the Interim and Summative report.

¹²⁷ This is a state-specific hypothesis. The research questions included here focus on non-eligibility periods. Goals 2, 3 and 4 address member understanding of and experiences with policies related to the community engagement requirements, the tobacco surcharge, and POWER accounts.

¹²⁸ This question takes the place of CMS’ premium-related subsidiary research question 2.2b (Do beneficiaries with monthly account payments understand what services result in debits from their accounts and how their service use impacts account balances?).

Indiana 1115(a) Demonstration Evaluation Plan

F. Analytic Tables, Goal 5: Ensure HIP program policies align with commercial policies, are understood by members, and promote positive member experience and minimize coverage gaps

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.1, continued	<p>Primary RQ 1.2 – Do HIP members subject to non-eligibility periods understand program requirements and how to comply with them?</p> <p><i>Note: Goal 4, H.1, RQ 1.1 also addresses this question.</i></p>	Reported knowledge of program requirements and how to comply with them	<ul style="list-style-type: none"> Key informant interview with members (2019, 2020, 2021) Member Survey (2021) 	Descriptive quantitative and qualitative analysis (depending on data source)	n.a.	<p>Interim Evaluation 2019</p> <p>Summative Evaluation 2022</p>
	<p>Primary RQ 1.3 – Do HIP members subject to non-eligibility periods understand the consequence for noncompliance with program requirements?</p>	Reported knowledge of non-eligibility period consequence for noncompliance with program requirements	<ul style="list-style-type: none"> Key informant interview with members (2019, 2020, 2021) Member Survey (2021) 	Descriptive quantitative and qualitative analysis (depending on data source)	n.a.	<p>Interim Evaluation 2019</p> <p>Summative Evaluation 2022</p>
	<p>Primary RQ 1.4 – What are common barriers to compliance with program requirements that have non-eligibility period consequences for noncompliance?</p>	Reported barriers to complying with program requirements	<ul style="list-style-type: none"> Key informant interview with members, MCE and FSSA officials interviews (2019, 2020, 2021) 	Descriptive qualitative analysis	n.a.	<p>Interim Evaluation 2019</p> <p>Summative Evaluation 2022</p>

Indiana 1115(a) Demonstration Evaluation Plan

F. Analytic Tables, Goal 5: Ensure HIP program policies align with commercial policies, are understood by members, and promote positive member experience and minimize coverage gaps

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.2 – Beneficiaries will be satisfied with the HIP program. ¹²⁹	Primary RQ 2.1 – What is the level of satisfaction with HIP among HIP members? ¹³⁰	Themes related to member satisfaction	<ul style="list-style-type: none"> Key informant interview with members, provider, MCE and FSSA officials interviews (2019, 2020 and 2021) 	Descriptive qualitative analysis	n.a.	Interim Evaluation 2019 Summative Evaluation 2022
		<ul style="list-style-type: none"> Proportion of members having high satisfaction with the program Proportion of members considering HIP a good value relative to its costs 	<ul style="list-style-type: none"> Member Survey (2021) All Leaver Surveys (Non-payment of POWER Account Contribution, income) (2021) 	Descriptive quantitative analysis	n.a.	Summative Evaluation 2022
H.3 – Individuals subject to the non-eligibility/lockout periods (payment and redetermination) and retroactive eligibility are no different from commercial market populations. ¹³¹	Primary RQ 3.1 – Do HIP members that are subject to non-eligibility periods have similar demographic characteristics as the commercial market population?	Distribution of demographic characteristics by year such as the following: <ul style="list-style-type: none"> Gender Age Educational level Income Race and ethnicity 	IPUMS ACS data, variables SEX, AGE, EDUC, INCTOT, RACE, and HISPAN (2015-2020) Program administrative data (2015-2020)	Descriptive quantitative analysis	Adults ≤138% FPL enrolled in commercial coverage (2015-2020)	Summative Evaluation 2022

¹²⁹ This is a State-specific hypothesis.

¹³⁰ This is a State-specific question.

¹³¹ This hypothesis pertains to three distinct HIP populations: 1) members subject to non-payment eligibility periods, 2) members subject to redetermination non-eligibility periods, and 3) individuals who do not receive retroactive eligibility.

Indiana 1115(a) Demonstration Evaluation Plan

F. Analytic Tables, Goal 5: Ensure HIP program policies align with commercial policies, are understood by members, and promote positive member experience and minimize coverage gaps

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.3, continued	Primary RQ 3.2 – Do HIP members that are not retroactively eligible have similar demographic characteristics as the commercial market population?	Distribution of demographic characteristics by year such as the following: <ul style="list-style-type: none"> • Gender • Age • Educational level • Income • Race and ethnicity 	IPUMS ACS data, variables SEX, AGE, EDUC, INCTOT, RACE, HISPAN (2015-2020) Program administrative data (2015-2020)	Descriptive quantitative analysis	Adults ≤138% FPL enrolled in commercial coverage (2015-2020)	Summative Evaluation 2022
H.4 – Eliminating or reducing retroactive eligibility will not reduce member enrollment or access to health care; decrease health status; or have adverse financial impact	Primary RQ 4.1 - Do eligible people subject to retroactive eligibility waivers enroll in Medicaid at the same rates as other eligible people who have access to retroactive eligibility? (CMS Guidance Hypothesis 1, RQ 1.1)	Proportion of eligible population enrolled in Medicaid	IPUMS ACS data, variables HINSCAID, HCOVANY and HINSCARE (2011-2020)	Regression model of eligible population enrolling in Medicaid (IN and other selected states with expansion)	Low-income adults (19-64) enrolled in/eligible for Medicaid in Indiana compared to similar adults during the same time period in selected Medicaid expansion states that provide retroactive coverage ¹³²	Summative Evaluation 2022

¹³² Indiana has retroactive waiver from 2015. Only pregnant women and individuals with disability have retroactive coverage. Hence, there are no comparable beneficiary group for Indiana HIP, given how inclusive eligibility is for this program. Comparing program experience pre- and post-2015 will likely not capture impact of retroactive eligibility waiver as multiple changes were implemented in Medicaid coverage for HIP 2.0.

Indiana 1115(a) Demonstration Evaluation Plan

F. Analytic Tables, Goal 5: Ensure HIP program policies align with commercial policies, are understood by members, and promote positive member experience and minimize coverage gaps

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.4, continued	Primary RQ 4.2 - Do beneficiaries subject to the retroactive eligibility waiver understand that they will not be covered during enrollment gaps? (CMS Guidance Hypothesis 1, Subsidiary RQ 1.2a)	Reported knowledge of consequence due to coverage gaps for not renewing in a timely manner	Member Survey (2021)	Descriptive quantitative analysis	n.a	Summative Evaluation 2022
	Subsidiary RQ 4.2a - What are common barriers to timely renewal for those subject to the retroactive eligibility waiver? (CMS Guidance Hypothesis 1, Subsidiary RQ 1.2b)	Reported barriers to timely renewal	Key informant interview with members, provider, MCE and FSSA officials interviews (2020 and 2021)	Qualitative descriptive analysis	n.a.	Summative Evaluation 2022

Indiana 1115(a) Demonstration Evaluation Plan

F. Analytic Tables, Goal 5: Ensure HIP program policies align with commercial policies, are understood by members, and promote positive member experience and minimize coverage gaps

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
H.4 continued	Primary RQ 4.3 - Do beneficiaries subject to the retroactive eligibility waiver have better health outcomes than other beneficiaries who have access to retroactive eligibility? (CMS Guidance Hypothesis 3, RQ 3.1)	Reported health status	BRFSS (2013 – 2020) ⁵³ Variable GENHLTH	Difference-in-differences regression model of self-reported health status/healthy days among the likely eligible population ¹³³	Low-income adults (19-64) enrolled in/eligible for Medicaid in Indiana compared to similar adults during the same time period in states that provide retroactive coverage	Summative Evaluation 2022
	Primary RQ 4.4 - Does the retroactive eligibility waiver lead to changes in the incidence of beneficiary medical debt? (CMS Guidance Hypothesis 4, RQ 4.1)	Reported medical debt (medical bills)	BRFSS (2013 – 2020) ⁵³ , variable MEDBILL1	Difference-in-differences regression model of medical debt among the likely eligible population ¹³³	Low-income adults (19-64) enrolled in/eligible for Medicaid in Indiana compared to similar adults during the same time period in states that provide retroactive coverage	Summative Evaluation 2022

¹³³ Differences in outcome measure between low-income adults (19-64) enrolled in/eligible for Medicaid in Indiana compared to similar adults during the same time period in states that provide retroactive coverage can be due to multiple reasons including differences in Medicaid coverage policies across states (including retroactive waiver).

Indiana 1115(a) Demonstration Evaluation Plan

F. Analytic Tables, Goal 6: Assess the costs to implement and operate HIP and other non-cost outcomes of the demonstration

Goal 6: Assess the costs to implement and operate HIP and other non-cost outcomes of the demonstration

Exhibit F.10: Goal 6¹³⁴

Note: In order to reduce the duplication of efforts, and thus cost, Goal 6 analyses will be completed by Indiana’s actuary, Milliman, Inc., and appended to the Summative Evaluation Report. The results where relevant will be incorporated into overall evaluation analysis, as appropriate.

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
n.a.	Primary RQ 1 – What are the administrative costs incurred by the State to implement and operate the HIP demonstration?	<ul style="list-style-type: none"> • Annual administrative costs to implement and operate the demonstration • Contracts or contract amendments to implement, monitor, and evaluate demonstration policies • Annual staff time equivalents needed to implement, administer, and communicate with members about demonstration policies • Annual Medicaid agency staff time for those hired to support the demonstration, and time redirected from other Medicaid operations • Identified costs or cost savings accruing to other state agencies that partner with Medicaid (i.e., increased state spending for job readiness programs) 	State administrative records for 2018-2020	Descriptive analysis of administrative costs	n.a.	Summative Evaluation 2022

¹³⁴ For the evaluation, outcome measures will include time frame component, for example, the proportion of members using primary care within a 6-month period or enrollment in disease management within 12 month. The exact definition of the measures will be included in the interim and Summative report.

Indiana 1115(a) Demonstration Evaluation Plan

F. Analytic Tables, Goal 6: Assess the costs to implement and operate HIP and other non-cost outcomes of the demonstration

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
n.a.	Primary RQ 2 – What are the short- and long-term effects of eligibility and coverage policies on Medicaid health care expenditures?	<ul style="list-style-type: none"> Total annual health service expenditures for demonstration population Change in annual PMPM health service expenditures 	CY 2016-2020 Medicaid funded-health care expenditures (in total and PMPM): <ul style="list-style-type: none"> All HIP members Expansion members only Basic members Plus members Members subject to community engagement requirements (excluding any exempt members) New adult group enrollment from the Medicaid Budget and Expenditure System (MBES) and expenditures from Transformed Medicaid Statistical Information System (T-MSIS) Medicaid Analytic Extracts (MAX)— pending CMS approval for research <ul style="list-style-type: none"> Indiana, Ohio, and Kentucky (two comparable states) 	<ul style="list-style-type: none"> Difference-in-differences regression model of total service expenditures Difference-in-differences regression model of PMPM service expenditures 	Compare health service expenditures for the demonstration population to health service expenditures for a similar population in two comparison states (total and PMPM)	Summative Evaluation 2022

Indiana 1115(a) Demonstration Evaluation Plan

F. Analytic Tables, Goal 6: Assess the costs to implement and operate HIP and other non-cost outcomes of the demonstration

Hypothesis	Research Question	Outcome Measure(s)	Data Sources	Analytic Approach	Comparison Strategy	Reporting Schedule
n.a.	Primary RQ 3 – What are the impacts of eligibility and coverage policies on provider uncompensated care costs?	Change in total uncompensated care costs annually	HCRIS data: <ul style="list-style-type: none"> • Worksheet S-10, line 31 • 2013-2014 (before HIP 2.0) vs 2018-2020 • Indiana, Ohio, and Kentucky (two comparable states) and South Carolina (non-expansion “control” state) 	Difference-in-differences regression model of uncompensated care costs	Two comparable states that have similar Medicaid eligibility criteria but do not operate a similar demonstration	Summative Evaluation 2022