Data Notes for Medicaid TAF Long-Term Services and Supports Annual Expenditures and Users, 2019-2021

Alexandra Carpenter, Michelle Eckstein, Caitlin Murray, Cara Stepanczuk, and Andrea Wysocki, Mathematica

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Introduction and methodology

This document includes state data notes and anomalies to be used as contextual information for the Medicaid Long-Term Services and Supports (LTSS) Annual Expenditures and Users 2019–2021 Transformed Medicaid Statistical Information System Analytic File (TAF) data tables and research briefs summarizing key findings, which are available at https://www.medicaid.gov/medicaid/long-term-services-supports/reports-evaluations/index.html. In some cases, the data notes describe issues with mapping claims to individual LTSS categories and other data notes describe overall TAF data quality issues. Because there are many interactions between the issues identified, we were unable to determine the overall impact of these issues on the results for each state...¹

Approach for state feedback notes on expenditures. We sent each state Medicaid agency a preview of our calculations for their LTSS expenditures for 2019–2021 along with a companion methodology document. We hosted a webinar for states to address the layout of the expenditure preview files and our methodology, and states had the opportunity to ask questions about the methods and results. After this webinar, we collected feedback from states about the results through email and via web meetings, with a deadline for responses by August 31, 2023. State comments have been condensed and are included in the column in Table 1 labeled "State feedback notes on expenditures."

Approach for 2019-2021 data quality notes. In addition to collecting direct state feedback, we conducted systematic analyses of the quality of states' TAF data related to the identification of LTSS users, expenditures, and characteristics (Table 1). These analyses included:

• Summary of states' assessments on TAF DQ Atlas.² topics relevant to LTSS user and expenditure calculations. When an aspect of a state's data is considered unusable or of a high level of concern, it may adversely affect LTSS user counts, expenditures, and/or identification of characteristics.

² For more information on the TAF DQ Atlas methods, including thresholds for determining data usability and definitions of key terms, please see the Background and Methods section for each topic, available at https://www.medicaid.gov/dg-atlas/.



¹ For more information about the methodology and the versions of the TAF that were used to produce the results, see the accompanying document titled "Methodology for Identifying Medicaid Long-Term Services and Supports Expenditures and Users, 2019–2021."

- Comparison of state-reported information from the CMS-64 reports (of more than \$1,000 in a given category) and TAF expenditure and user identification. For states that report expenditures in LTSS categories in the CMS-64, we would expect to identify both LTSS users and expenditures in those categories in the TAF (and vice versa). A discrepancy may indicate that TAF-based users and/or expenditures are misclassified. All of the CMS-64 categories used in the analysis can be mapped to either fee-for-service (FFS) or managed care expenditures except for one: section 1915(k) Community First Choice has three lines in the CMS-64 for reporting MC expenditures and one line for reporting FFS expenditures; we conducted separate checks for FFS and MC reporting.
- Comparison of state-reported PACE enrollment information from the Medicaid Managed Care
 Enrollment Report³ to PACE user counts in the DE file and PACE expenditures from capitation
 payment records. For states that report enrollees in PACE plans in the Medicaid Managed Care
 Enrollment Report, we would expect to identify PACE enrollees in the DE file and PACE expenditures in
 capitation payment records (and vice versa). A discrepancy may indicate that TAF-based PACE user
 counts or expenditures are over or underreported.
- Discrepancy between information on home and community-based services (HCBS) program
 enrollment reported in the TAF Demographic and Eligibility (DE) enrollment file versus program
 information reported on claims and encounters in the TAF Other Services (OT) claims file. For states
 that identify enrollees in HCBS programs in the DE file, we would expect to identify claims for those
 types of HCBS in the OT files. A discrepancy might indicate the TAF-based users or expenditures for
 that category are over or underreported.

³ The Medicaid Managed Care Enrollment Report is available at https://www.medicaid.gov/medicaid/managed-care/enrollment-report/index.html.

Acronyms for Table 1

ACS American Community Survey
CMC comprehensive managed care

CMS-64 The form CMS-64, Quarterly Medicaid Statement of Expenditures for the Medical Assistance

Program

DE Demographic and Eligibility (TAF enrollment file)

DSH disproportionate share hospital

FY fiscal year

HCBS home and community-based services

ICF/IID intermediate care facility for individuals with intellectual disabilities

FFS fee-for-service

LTS Long-Term Care (TAF claims file)
LTSS long-term services and supports

MFP Money Follows the Person demonstrationMSIS Medicaid Statistical Information System

OT Other Services (TAF claims file)

PACE Program of All-Inclusive Care for the Elderly

PAS personal assistance services

TAF T-MSIS Analytic Files

T-MSIS Transformed Medicaid Statistical Information System

Table 1. Data notes for LTSS Annual Expenditures and Users, Calendar Years 2019-2021 TAF Data

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Alabama	Alabama's 2021 LTSS measures have been been suppressed due to concerns about the quality of the TAF data used in the calculations. All LTSS measures for the state have been replaced with a value of "NC" indicating that the state's LTSS measures have not been calculated and their data are not included in any national calculations. Alabama only provided notes for the 2021 output, which are not relevant to report given the data suppression.	 TAF data contain a high percentage of service use records that do not link to an eligibility record in the month of service. Dual eligibility code in the TAF is of high concern due to missing values or not having any beneficiaries in an expected category. The state reported section 1915(j) self-directed PAS option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported PACE expenditures in the CMS-64. The state reported PACE users in the DE file, but we did not identify PACE expenditures in the OT file. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. 	 Dual eligibility code in the TAF is of high concern due to missing values or not having any beneficiaries in an expected category. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported section 1915(j) self-directed PAS option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported PACE expenditures in the CMS-64. The state reported PACE users in the DE file, but we did not identify PACE expenditures in the OT file. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. 	Alabama's 2021 LTSS measures have been been suppressed due to concerns about the quality of the TAF data used in the calculations. All LTSS measures for the state have been replaced with a value of "NC" indicating that the state's LTSS measures have not been calculated and their data are not included in any national calculations.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Alaska	Alaska indicated expenditures provided in the output are in alignment with expected values.	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified state plan rehabilitative services FFS users and FFS expenditures in the CMS-64. 	 We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified state plan rehabilitative services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. 	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified state plan rehabilitative services FFS users and FFS expenditures in the CMS-64.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Arizona	Arizona did not provide any notes.	 OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. The state reported state plan case management services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. 	 OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. The state reported state plan case management services expenditures in the CMS-64. The state had state plan case management services FFS users in the OT file, but did not have state plan case management services FFS expenditures. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. 	 OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Arkansas	Arkansas did not provide any notes.	 The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported ICF/IID expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. 	 The state reported ICF/IID expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. 	 The state reported ICF/IID expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.
California	 California indicated that they have a section 1915(i) HCBS state plan option authority. However, section 1915(i) HCBS state plan option expenditures for California are reported as \$0 in the output because there were no TAF claims that met the criteria for this service category. California indicated that they have a section 1915(j) self-directed PAS option. However, section 1915(j) self-directed PAS option expenditures for California are reported as \$0 in the output because there were no TAF claims that met the criteria for this service category. 	 OT files are of high concern due to a high percentage of claims with unexpected combinations of type of bill code and place of service code, and this could have impacted the identification of state plan rehabilitative and private duty nursing service users. LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. 	 Place of service code in the OT file is of high concern, and this could have impacted the identification of state plan rehabilitative and private duty nursing service users. OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. The state reported section 1915(j) self-directed PAS option expenditures in the CMS-64, but we did not identify FFS 	 LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
California (cont)	 California indicated that they have a section 1915(k) Community First Choice authority. However, section 1915(k) Community First Choice expenditures for California are reported as \$0 in the output because there were no TAF claims that met the criteria for this service category. California indicated that their MFP expenditures were lower than expected. These expenditures may be underestimated when compared to other reports and/or data sources. California indicated that their 2020 PACE expenditures were lower than expected. These expenditures may be underestimated when compared to other reports and/or data sources. California indicated that their state plan private duty nursing services expenditures were lower than expected. These expenditures may be underestimated when compared to other reports and/or data sources. California indicated that their state plan private duty nursing services expenditures were lower than expected. These expenditures may be underestimated when compared to other reports and/or data sources. California indicated that their total HCBS expenditures for 2020 were lower than expected. 	 A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. The state reported section 1915(i) HCBS state plan option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported section 1915(j) self-directed PAS option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported section 1915(k) Community First Choice FFS expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. 	users or FFS expenditures in the TAF. The state reported section 1915(k) Community First Choice FFS expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported section 1915(i) HCBS state plan option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF.	beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. The state reported section 1915(i) HCBS state plan option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported section 1915(j) self-directed PAS option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported section 1915(k) Community First Choice FFS expenditures in the CMS- 64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF.

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State	State feedback notes on	2019 data quality notes	2020 data quality potos	2021 data quality notes
	These expenditures may be underestimated when compared to other reports and/or data sources. California indicated that the decrease in nursing facility expenditures between 2019 and 2021 was unexpected. These expenditures may be underestimated when compared to other reports and/or data sources. California indicated that the decrease in ICF/IID expenditures between 2019 and 2021 was unexpected. These expenditures may be underestimated when compared to other reports and/or data sources. California indicated that their state plan personal care services may be underreported in TAF because California uses local codes that are not recognized in TAF. These expenditures may differ when compared to other reports and/or data sources.	 The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. 	. 2020 data quality notes	. 2021 data quality notes

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Colorado	Colorado indicated that they cover state plan private duty nursing services. However, state plan private duty nursing services expenditures for Colorado are reported as \$0 in the output because there were no TAF claims that met the criteria for this service category. Colorado indicated that state plan private duty nursing services for 2019 to 2021 are being coded under state plan home health services.	 OT files are of concern because they have high volumes of CMC header records compared with other states. OT files are of concern because they have high volumes of CMC encounter line records compared with other states. The state reported section 1915(i) HCBS state plan option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan private duty nursing services expenditures in the CMS-64. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan rehabilitative services FFS 	 OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported section 1915(i) HCBS state plan option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified state plan rehabilitative services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the TAF, but the state did not report expenditures in the TAF, but the state did not report expenditures in the CMS-64. 	 OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. OT files are of concern because they have high volumes of CMC header records compared with other states. The state reported mental health facility expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan rehabilitative services FFS users and FFS expenditures in the TAF. We identified state plan rehabilitative services FFS users and FFS expenditures in the TAF. The state reported MFP demonstration services users

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Colorado (cont)		users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. • The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file.	The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file.	in the DE file, but we did not identify users in the OT file.
Connecticut	 Connecticut indicated that they have mental health facility-DSH payments. However, mental health facility-DSH expenditures for Connecticut are reported as \$0 in the output because there were no TAF claims that met the criteria for this service category. Connecticut indicated that they did not have a section 1915(i) HCBS state plan option in 2019 and 2020. However, section 1915(i) HCBS state plan option expenditures for Connecticut are included in the output for 2019 and 2020 as the state had TAF claims that met the criteria for this service category. Connecticut indicated that their 2021 section 1915(i) HCBS state plan option expenditures were higher than expected. These expenditures may be overestimated when compared to other reports and/or data sources. 	 We identified section 1915(i) HCBS state plan option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS- 64. The state reported mental health facility DSH expenditures in the CMS- 64, but we did not identify expenditures in the TAF. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified state plan rehabilitative services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the TAF, but the state did not report expenditures in the CMS-64. 	 We identified section 1915(i) HCBS state plan option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified state plan rehabilitative services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. 	 The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified state plan rehabilitative services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Connecticut (cont)	 Connecticut indicated that they do not cover state plan personal care services. However, state plan personal care services expenditures for Connecticut are included in the output as the state had TAF claims that met the criteria for this service category. Connecticut indicated that their 2019 case management expenditures were higher than expected. These expenditures may be overestimated when compared to other reports and/or data sources. 			

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Delaware	Delaware did not provide any notes.	 We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS- 64. We identified state plan case management services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS- 64. The state reported mental health facility DSH expenditures in the CMS- 64, but we did not identify expenditures in the TAF. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. 	 LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. 	 We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
District of Columbia	 The District of Columbia believes that self-directed personal care services covered under their section 1915(c) waiver program are being incorrectly captured under state plan personal care services. The District of Columbia indicated that they had an approved section 1915(i) HCBS state plan option in calendar years 2019-2021. However, section 1915(i) HCBS state plan option expenditures for the District of Columbia are reported as \$0 in the output because there were no TAF claims that met the criteria for this service category. The District of Columbia indicated that certain services are reported and/or classified differently in the TAF than in District-published reports or publications, including but not necessarily limited to self-directed services, MFP demonstration services, personal care services, and mental health services. 	 LT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. The District reported section 1915(i) HCBS state plan option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan case management services FFS users and FFS expenditures in the TAF, but the District did not report expenditures in the CMS-64. The District reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. 	 OT files are of concern because they have high volumes of CMC header records compared with other states. The District reported section 1915(i) HCBS state plan option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan case management services FFS users and FFS expenditures in the TAF, but the District did not report expenditures in the CMS-64. The District reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. 	 The District reported 1915(i) expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan case management services FFS users and FFS expenditures in the TAF, but the District did not report expenditures in the CMS-64. The District reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The District reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Florida	Florida did not provide any notes.	 LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. LT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. We identified section 1915(k) Community First Choice FFS and managed care users and expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. 	 LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. LT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(k) Community First Choice FFS and managed care users and expenditures in the TAF, but the state did not report expenditures in the CMS-64. 	 LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. LT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(k) Community First Choice FFS and managed care users and expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Florida (cont)		 We identified state plan rehabilitative services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(k) Community First Choice users in the OT file, but the state did not identify users in the DE file. 	 We identified state plan rehabilitative services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(k) Community First Choice users in the OT file, but the state did not identify users in the DE file. 	 We identified state plan rehabilitative services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(k) Community First Choice users in the OT file, but the state did not identify users in the DE file.
Georgia	Georgia did not provide any notes.	We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS- 64.	We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64.	The state reported state plan personal care services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Hawaii	 Hawaii identified mapping and data interpretation errors with their TAF LTSS data submission so the output might not match LTSS output from other reports and/or data sources produced by Hawaii. Hawaii indicated that their section 1915(c) waiver program expenditures were higher than expected and these expenditures did not experience the high increases reflected in the output from 2019 to 2021. These expenditures may be overestimated when compared to other reports and/or data sources. Hawaii indicated that their total managed care LTSS expenditures were lower than expected. These expenditures may be underestimated when compared to other reports and/or data sources. 	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file. 	The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file.	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Idaho	Idaho indicated that they do not have any feedback on the provided output.	 We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS- 64. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. 	 We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported section 1915(c) waiver program expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported section 1915(c) waiver program users in the DE file, but we did not identify users in the OT file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. 	 We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Illinois	Illinois did not provide any notes.	 LT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file. 	 LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file. 	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Indiana	Indiana did not provide any notes.	 We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS- 64. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. 	 We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified state plan case management services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. 	 We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
lowa	lowa indicated expenditures provided in the output are in alignment with expected values.	 A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. The state reported section 1915(i) HCBS state plan option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file. 	 The state reported section 1915(i) HCBS state plan option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file. 	 A high percentage of service tracking claims have problematic MSIS ID values are missing service tracking type codes, or are missing service tracking payment. The state reported section 1915(i) HCBS state plan option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan private duty nursing service expenditures in the CMS-6 but we did not identify FFS users or FFS expenditures in the TAF. The state reported MFP demonstration services use in the DE file, but we did not identify users in the OT file
Kansas	Kansas indicated that their nursing facility expenditures were lower than expected and estimated them increasing from around \$557 million in 2019 to \$630 million in 2021. These	LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data.	LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS- 64 data.	LT files are of concern due a large difference in FFS expenditures for institution long-term care services between TAF and the CMS 64 data.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Kansas (cont)	expenditures may be underestimated when compared to other reports and/or data sources. Kansas indicated that their 2019 and 2020 ICF/IID expenditures were higher than expected. These expenditures may be overestimated when compared to other reports and/or data sources. Kansas indicated that their 2020 and 2021 section 1915(c) waiver program expenditures were lower than expected and estimated them increasing from around \$661 million in 2019 to \$741 million in 2020 to \$745 million in 2021. These expenditures may be underestimated when compared to other reports and/or data sources. Kansas indicated that their state plan personal care services expenditures appeared lower than expected based on what they provide through section 1915(c) waiver programs, but the output reported is for state plan personal care services expenditures not provided through another HCBS program. Kansas indicated that their case management services	 OT files are of concern because they have high volumes of CMC encounter line records compared with other states. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. 	 We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. 	 The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Kansas (cont)	expenditures were higher than expected. These expenditures may be overestimated when compared to other reports and/or data sources. • Kansas indicated that they provide state plan private duty nursing services through two HCBS waivers, but the output reported is for state plan private duty nursing services not provided through another HCBS program. However, state plan private duty nursing services expenditures for Kansas are reported as \$0 in the output because there were no TAF claims that met the criteria for this service category.			
	Kansas indicated that their state plan home health services expenditures differed from expected values and may differ when compared to other reports and/or data sources.			

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Kentucky	Kentucky indicated that they do not have any feedback on the provided output.	 The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file. 	 We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the DE file, but we did not identify users in the OT file. 	 TAF data are of high concern due to a large difference in enrollment numbers compared to Performance Indicator data. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the DE file, but we did not identify users in the OT file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Louisiana	Louisiana did not provide any notes.	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. OT files are of concern because they have high volumes of CMC header records compared with other states. OT files are of concern because they have high volumes of CMC encounter line records per header compared with other states. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. 	 OT files are of concern because they have high volumes of CMC encounter line records per header compared with other states. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. 	 Primary language in the TAI is of high concern due to differing categories compared to the ACS, a hig percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. OT files are of concern because they have high volumes of CMC encounter line records per header compared with other states. The state reported mental health facility DSH expenditures in the CMS-64 but we did not identify expenditures in the TAF. The state reported state pla rehabilitative services expenditures in the CMS-64 but we did not identify FFS users or FFS expenditures in the TAF.
Maine	Maine indicated that their ICF/IID expenditures were higher than expected and estimated their expenditures to be about three times lower than reported. These expenditures may be overestimated when compared	 OT files have a high percentage of FFS claims with zero, missing, or negative payment amounts. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify 	 The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH 	 The state reported mental health facility DSH expenditures in the CMS-64 but we did not identify expenditures in the TAF. The state reported state pla rehabilitative services expenditures in the CMS-64

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Maine (cont)	to other reports and/or data sources. • Maine indicated that their mental health facility expenditures were lower than expected. These expenditures may be underestimated when compared to other reports and/or data sources. • Maine indicated that their section 1915(c) waiver program expenditures were lower than expected. These expenditures may be underestimated when compared to other reports and/or data sources. • Maine indicated that their 2019 state plan personal care services expenditures were higher than expected. These expenditures may be overestimated when compared to other reports and/or data sources. • Maine indicated that their state plan home health services expenditures were higher than expected. These expenditures may be overestimated when compared to other reports and/or data sources. • Maine indicated that their state plan home health services expenditures may be overestimated when compared to other reports and/or data sources. • Maine indicated that they have state plan rehabilitative services. However, state plan rehabilitative services	FFS users or FFS expenditures in the TAF.	expenditures in the CMS-64, but we did not identify expenditures in the TAF.	but we did not identify FFS users or FFS expenditures in the TAF. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Maine (cont)	expenditures for Maine are reported as \$0 in the output because there were no TAF claims that met the criteria for this service category. • Maine indicated that their case management services expenditures were lower than expected. These expenditures may be underestimated when compared to other reports and/or data sources. • Maine indicated that their state plan private duty nursing services expenditures were lower than expected. These expenditures may be underestimated when compared to other reports and/or data sources.			
Maryland	Maryland did not provide any notes.	 LT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking 	 The state reported mental health facility expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan personal care services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, 	 A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported mental health facility expenditures in the TAF. The state reported mental health facility expenditures in the CMS-64, but we did not

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Maryland (cont)		type codes, or are missing service tracking payment. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported mental health facility expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan personal care services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(k) Community First Choice users in the OT file, but the state did not identify users in the DE file.	 but we did not identify expenditures in the TAF. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(k) Community First Choice users in the OT file, but the state did not identify users in the DE file. 	 identify FFS users or FFS expenditures in the TAF. The state reported state plan personal care services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(k) Community First Choice users in the OT file, but the state did not identify users in the DE file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Massachusetts	Massachusetts indicated that their LTSS expenditures were higher than expected. These expenditures may be overestimated when compared to other reports and/or data sources.	 OT files are of high concern because they have an unusually high volume of header claims compared with other states. LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. OT files are of concern because they have high volumes of CMC header records compared with other states. OT files are of concern because they have high volumes of CMC encounter line records compared with other states. OT files are of concern because they have high volumes of CMC encounter line records compared with other states. OT files are of concern because they have high volumes of CMC encounter line records per header compared with other states. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan rehabilitative services 	 OT files are of high concern because they have an unusually high volume of header claims compared with other states. OT files are of concern because they have high volumes of CMC header records compared with other states. OT files are of concern because they have high volumes of CMC encounter line records per header compared with other states. LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(j) self-directed PAS option 	 OT files are of high concern because they have an unusually high volume of header claims compared with other states. OT files are of concern because they have high volumes of CMC header records compared with other states. OT files are of concern because they have high volumes of CMC encounter line records compared with other states. OT files are of concern because they have high volumes of CMC encounter line records per header compared with other states. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Massachusetts (cont)		expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. • We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.	users in the OT file, but the state did not identify users in the DE file.	
Michigan	 Michigan indicated that their nursing facility expenditures were lower than expected. These expenditures may be underestimated when compared to other reports and/or data sources. Michigan indicated that there was a decrease in their FFS nursing facility payments in 2020 and 2021 compared with 2019 due to the COVID-19 pandemic. Michigan also changed the crossover indicator reporting in 2020 which resulted in a higher proportion of payments filtering out of the calculations. Michigan indicated that their state plan private duty nursing services expenditures were lower than expected due to the switch from professional to institutional claim type in 2020, so place of service codes are less frequently populated and 	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported mental health facility expenditures in the TAF. The state reported state plan personal care services expenditures in the CMS-64, but we did not identify 	 The state reported mental health facility expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported section 1915(i) HCBS state plan option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan personal care services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported section 1915(i) HCBS state plan option users in the DE file, 	 The state reported mental health facility DSH expenditures in the CMS but we did not identify expenditures in the TAF. The state reported mental health facility expenditure the CMS-64, but we did ridentify FFS users or FFS expenditures in the TAF. The state reported state personal care services expenditures in the CMS-but we did not identify FI users or FFS expenditures the TAF.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Michigan (cont)	more claims are filtered out by the place of service exclusion for the state plan private duty nursing service calculations. These expenditures may be underestimated when compared to other reports and/or data sources.	FFS users or FFS expenditures in the TAF.	but we did not identify users in the OT file.	
	 Michigan indicated that their state plan rehabilitative services expenditures were lower than expected due to the switch from professional to institutional claim type in 2020, so place of service codes are less frequently populated and more claims are filtered out by the place of service exclusion for the state plan rehabilitative service calculations. These expenditures may be underestimated when compared to other reports and/or data sources. Michigan indicated that they have state plan personal care services. However, FFS state plan personal care services expenditures for Michigan are reported as \$0 in the output because there were no TAF claims that met the criteria for this service category. 			
	FFS section 1915(c) waiver program payments dropped in 2020 and 2021, compared with			

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Michigan (cont)	2019 due to the COVID-19 pandemic. Michigan also changed the crossover indicator reporting in 2020, which resulted in a higher proportion of payments filtering out of the calculations		•	
Minnesota	Minnesota indicated that their managed care LTSS expenditures are lower than expected. Minnesota indicated that these differences may be attributed to an underlying system change regarding long-term care facility encounters. These expenditures may be underestimated when compared to other reports and/or data sources.	 OT files are of high concern because they have an unusually high volume of non-denied line claims compared with other states. OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. OT files are of concern because they have high volumes of CMC encounter line records compared with other states. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. 	 OT files are of high concern because they have an unusually high volume of non-denied line claims compared with other states. OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. 	 OT files are of high concern because they have an unusually high volume of non-denied line claims compared with other states. OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Mississippi	Mississippi did not provide any notes.	 OT files are of concern because they have high volumes of CMC header records compared with other states. OT files are of concern because they have high volumes of CMC encounter line records compared with other states. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. 	• None.	 OT files are of concern because they have high volumes of CMC header records compared with other states. OT files are of concern because they have high volumes of CMC encounter line records compared with other states. The state reported section 1915(i) HCBS state plan option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan personal care services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF.

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State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Mississippi (cont)				 We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.
Missouri	Missouri did not provide any notes.	 The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported mental health facility expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(c) waiver program users in the OT file, but the state did not identify users in the DE file. 	 The state reported mental health facility expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified section 1915(c) waiver program users in the OT file, but the state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file. 	 The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported mental health facility expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(c) waiver program users in the OT file, but the state did not identify users in the DE file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Montana	Montana indicated that they do not have any feedback on the provided output.	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. The state reported section 1915(k) Community First Choice FFS expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file. 	 The state reported section 1915(j) self-directed PAS option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported section 1915(k) Community First Choice FFS expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. 	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. The state reported section 1915(k) Community First Choice FFS expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file.
Nebraska	Nebraska indicated that their 2019 and 2020 section 1915(c) waiver program expenditures were lower than expected. These expenditures may be underestimated when	 LT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. OT files have a high percentage of FFS claims 	 LT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. OT files have a high percentage of FFS claims 	 LT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. Primary language in the TAF is of high concern due to

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Nebraska (cont)	compared to other reports and/or data sources. Nebraska indicated that they have state plan personal care services and estimated expenditures around \$10 million each year. However, state plan personal care services expenditures for Nebraska are reported as \$0 in the output because there were no TAF claims that met the criteria for this service category. Nebraska indicated that they have state plan case management services and estimated expenditures around \$30 million each year. However, case management services program expenditures for Nebraska are reported as \$0 in the output because there were no TAF claims that met the criteria for this service category. Nebraska indicated that their state plan home health services expenditures were higher than expected. These expenditures may be overestimated when compared to other reports and/or data sources. Nebraska indicated that their state plan rehabilitative services expenditures were higher than expected. These expenditures may be overestimated when compared to other reports and/or data sources.	with zero, missing, or negative payment amounts. Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. The state reported state plan case management services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported state plan personal care services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan rehabilitative services FFS users and FFS expenditures in the TAF.	 with zero, missing, or negative payment amounts. The state reported mental health facility expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan personal care services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan rehabilitative services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan case management services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified MFP demonstration services users in the OT file, but the state did not identify users in the DE file. 	differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. The state reported state plan case management services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan personal care services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan rehabilitative services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Nebraska (cont)	compared to other reports and/or data sources.	not report expenditures in the CMS-64. • We identified MFP demonstration services users in the OT file, but the state did not identify users in the DE file.		
Nevada	Nevada indicated that they do not have a section 1915(j) self-directed PAS option. However, section 1915(j) self-directed PAS option expenditures for Nevada are included in the output as the state had TAF claims that met the criteria for this service category.	 A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not 	 The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan personal care services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. 	 A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan personal care services expenditures in the CMS-64, but we did not identify FFS

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Nevada (cont)		identify FFS users or FFS expenditures in the TAF. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file.		users or FFS expenditures in the TAF. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the DE file, but we did not identify users in the OT file.
New Hampshire	New Hampshire indicated that they do not have any feedback on the provided output.	 A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported state plan rehabilitative services 	 A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. 	 LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. LT files are of concern due to a high percentage of missing or invalid type of service codes. The state reported mental health facility DSH expenditures in the CMS-64,

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
New Hampshire (cont)		expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported section 1915(k) Community First Choice users in the DE file, but we did not identify users in the OT file.	The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported section 1915(k) Community First Choice users in the DE file, but we did not identify users in the OT file.	 but we did not identify expenditures in the TAF. The state reported PACE expenditures in the CMS-64, but we did not identify users or expenditures in the TAF. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported section 1915(k) Community First Choice users in the DE file, but we did not identify users in the OT file.
New Jersey	New Jersey did not provide any notes.	 OT files are of high concern because they have an unusually high volume of header claims compared with other states. OT files are of high concern because they have an unusually high volume of line claims per header compared with other states. OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. Primary language in the TAF is of high concern due to 	 OT files are of high concern because they have an unusually high volume of header claims compared with other states. OT files are of concern because they have high volumes of CMC header records compared with other states. OT files are of concern because they have high volumes of CMC encounter line records per header compared with other states. OT files have a high percentage of managed care 	 OT files are of high concern because they have an unusually high volume of header claims compared with other states. LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
New Jersey (cont)		differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. OT files are of concern because they have high volumes of CMC header records compared with other states. OT files are of concern because they have high volumes of CMC encounter line records per header compared with other states. The state reported section 1915(j) self-directed PAS option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.	encounters with zero, missing, or negative payment amounts. • The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. • We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. OT files are of concern because they have high volumes of CMC header records compared with other states. OT files are of concern because they have high volumes of CMC encounter line records per header compared with other states. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
New Mexico	New Mexico did not provide any notes.	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. The Medicaid Managed Care Enrollment Report shows PACE users, but we did not identify PACE users or expenditures in TAF. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported PACE expenditures in the CMS-64, but we did not identify users or expenditures in the TAF. We identified state plan personal care services FFS users and FFS expenditures in the TAF. We identified state plan personal care services FFS users and FFS expenditures in the TAF. 	 We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported PACE expenditures in the CMS-64, but we did not identify users or expenditures in the TAF. The Medicaid Managed Care Enrollment Report shows PACE users, but we did not identify PACE users or expenditures in TAF. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. 	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. The Medicaid Managed Care Enrollment Report shows PACE users, but we did not identify PACE users or expenditures in TAF. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported PACE expenditures in the CMS-64. We identified section 1915(j) self-directed PAS option users or expenditures in the TAF. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
New Mexico (cont)		We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.		
New York	New York indicated that their managed care LTSS expenditures were higher than expected. These expenditures may be overestimated when compared to other reports and/or data sources.	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported section 1915(k) Community First Choice FFS and managed care expenditures in the CMS-64, but we did not identify FFS or managed care users or expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS- 	 We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported section 1915(k) Community First Choice FFS and managed care expenditures in the CMS-64, but we did not identify FFS or managed care users or expenditures in the TAF. We identified section 1915(i) HCBS state plan option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan personal care services expenditures in the CMS-64, but we did not identify FFS 	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. We identified section 1915(i) HCBS state plan option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported section 1915(k) Community First Choice FFS and managed care expenditures in the CMS-64, but we did not identify FFS or managed care

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
New York (cont)		 64, but we did not identify expenditures in the TAF. The state reported state plan personal care services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. 	users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.	 users or expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported state plan personal care services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
North Carolina	North Carolina indicated that they do not have a section 1915(j) self-directed PAS option. However, section 1915(j) self-directed PAS option expenditures for North Carolina are included in the output as the state had TAF claims that met the criteria for this service category.	 The state reported section 1915(c) waiver program expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. 	 The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported section 1915(c) waiver program expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. 	 The state reported section 1915(c) waiver program expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
North Dakota	 North Dakota indicated that their MFP expenditures were lower than expected. These expenditures may be underestimated when compared to other reports and/or data sources. North Dakota indicated that their mental health facility expenditures were lower than expected. These expenditures may be underestimated when compared to other reports and/or data sources. 	 The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file. 	 A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. 	 We identified section 1915(i) HCBS state plan option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF.
Ohio	Ohio did not provide any notes.	 LT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan case management services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS- 	 LT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan case management services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, 	 LT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan case management services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64,

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Ohio (cont)		 64, but we did not identify expenditures in the TAF. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file. 	 but we did not identify expenditures in the TAF. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file. 	 but we did not identify expenditures in the TAF. The state reported section 1915(i) HCBS state plan option users in the DE file, but we did not identify users in the OT file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the DE file, but we did not identify users in the OT file.
Oklahoma	Oklahoma did not provide any notes.	 We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS- 64. The state reported mental health facility DSH expenditures in the CMS- 64, but we did not identify expenditures in the TAF. The state reported state plan rehabilitative services expenditures in the CMS- 64, but we did not identify FFS users or FFS expenditures in the TAF. 	 We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified section 1915(j) self-directed PAS option 	 We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(j) self-directed PAS option

State Oklahoma (cont)	State feedback notes on expenditures	We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the	 2020 data quality notes users in the OT file, but the state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file. 	 2021 data quality notes users in the OT file, but the state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file.
Oregon	 Oregon indicated that their section 1915(c) waiver program1915(c) authority expenditures were higher than expected. These expenditures may be overestimated when compared to other reports and/or data sources. Oregon indicated that their section 1915(k) Community First Choice 1915(k) authority expenditures were lower than expected, but these might be identified as section 1915(c) waiver program expenditures instead. These expenditures may be underestimated when compared to other reports and/or data sources. Oregon indicated that their state plan personal care services expenditures were higher than expected. These expenditures may be overestimated when compared 	 OT file. LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. LT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. The state reported section 1915(j) self-directed PAS option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64. 	 LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. LT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported section 1915(j) self-directed PAS option expenditures in the 	 LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. LT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. LT files are of concern because they have unusually high number of CMC plans

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Oregon (cont)	to other reports and/or data sources. Oregon indicated that they have a section 1915(j) self-directed PAS option. However, section 1915(j) self-directed PAS option expenditures for Oregon are reported as \$0 in the output because there were no TAF claims that met the criteria for this service category.	 64, but we did not identify expenditures in the TAF. The state reported mental health facility expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(k) Community First Choice users in the OT file, but the state did not identify users in the DE file. 	CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(k) Community First Choice users in the OT file, but the state did not identify users in the DE file.	with no LT encounter header records in the TAF. The state reported section 1915(j) self-directed PAS option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(k) Community First Choice users in the OT file, but the state did not identify users in the DE file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Pennsylvania	Pennsylvania indicated that their section 1915(j) self-directed PAS option expenditures differed from expected values. These expenditures may differ when compared to other reports and/or data sources.	 LT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified state plan private duty nursing 	 LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. 	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.

	State feedback notes on			
State	expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Pennsylvania (cont)		services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. • We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.		
Rhode Island	Rhode Island indicated that their nursing facility expenditures were higher than expected. These expenditures may be overestimated when compared to other reports and/or data sources.	 A high percentage of expenditures do not link to an eligibility record in the month of service. Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. A high percentage of beneficiaries have a missing ZIP Code in the DE file. The state reported section 1915(c) waiver program expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. 	 OT files are of concern because they have high volumes of CMC encounter line records compared with other states. The state reported section 1915(c) waiver program expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan case management services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. 	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. The state reported state plan case management services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(c) waiver program users in the OT file, but the state did not identify users in the DE file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Rhode Island (cont)		 The state reported state plan case management services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. 		•
South Carolina	South Carolina did not provide any data notes.	The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF.	 The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. 	The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
South Dakota	 South Dakota indicated that their MFP expenditures were higher than expected. These expenditures may be overestimated when compared to other reports and/or data sources. South Dakota indicated that their state plan personal care services expenditures were higher than expected. These expenditures may be overestimated when compared to other reports and/or data sources. South Dakota indicated that their state plan home health services expenditures were higher than expected. These expenditures may be overestimated when compared to other reports and/or data sources. South Dakota indicated that they do not have a section 1915(i) HCBS state plan option. However, section 1915(i) HCBS state plan option expenditures for South Dakota are included in the output as the state had TAF claims that met the criteria for this service category. 	 We identified section 1915(i) HCBS state plan option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS- 64. The state reported mental health facility DSH expenditures in the CMS- 64, but we did not identify expenditures in the TAF. The state reported state plan home health services expenditures in the CMS- 64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS- 64. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. 	 We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(i) HCBS state plan option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported state plan home health services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. 	 We identified section 1915(i) HCBS state plan option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified state plan case management services FFS users in the TAF but no FFS expenditures in the TAF. The state did not report expenditures in the CMS-64. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported state plan home health services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Tennessee	 Tennessee indicated that they do not have a section 1915(j) self-directed PAS option. However, section 1915(j) self-directed PAS option expenditures for Tennessee are included in the output because the state had TAF claims that met the criteria for this service category. Tennessee indicated that their state plan personal care services expenditures differed from expected values. These expenditures may differ when compared to other reports and/or data sources. Tennessee indicated that their state plan home health services expenditures differed from expected values. These expenditures may differ when compared to other reports and/or data sources. Tennessee indicated that their state plan rehabilitative services expenditures differed from expected values. These expenditures may differ when compared to other reports and/or data sources. Tennessee indicated that their case management services expenditures may differ when compared to other reports and/or data sources. Tennessee indicated that their case management services expenditures differed from expected values. These 	 TAF data are of high concern due to a large difference in enrollment numbers compared to Performance Indicator data. OT files are of high concern because they have an unusually high volume of header claims compared with other states. OT files are of high concern because they have an unusually high volume of non-denied line claims compared with other states. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility expenditures in the CMS-64. We identified section 1915(c) waiver program users in the OT file, but the state did not identify users in the DE file. We identified section 1915(j) self-directed PAS option users in the OT file, 	 We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(c) waiver program users in the OT file, but the state did not identify users in the DE file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file. 	 TAF data are of high concern due to a large difference in enrollment numbers compared to Performance Indicator data. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified state plan rehabilitative services FFS users and FFS expenditures in the CMS-64. We identified state plan rehabilitative services FFS users and FFS expenditures in the CMS-64. We identified section 1915(c) waiver program users in the OT file, but the state did not identify users in the DE file. We identified section 1915(j) self-directed PAS option users in the OT file, but the

	State feedback notes on			
State	expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Tennessee (cont)	expenditures may differ when compared to other reports and/or data sources. Tennessee indicated that their state plan private duty nursing services expenditures differed from expected values. These expenditures may differ when compared to other reports and/or data sources. Tennessee indicated that their ICF/IID expenditures differed from expected values. These expenditures may differ when compared to other reports and/or data sources. Tennessee indicated that their nursing facility expenditures differed from expected values. These expenditures may differ when compared to other reports and/or data sources.	but the state did not identify users in the DE file.		state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file.
Texas	Texas did not provide any notes.	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. The state reported section 1915(i) HCBS state plan 	 We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. 	 Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. We identified section 1915(j) self-directed PAS option FFS

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Texas (cont)		option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported section 1915(k) Community First Choice managed care expenditures in the CMS-64, but but we did not identify managed care users or expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64.The state reported section 1915(i) HCBS state plan option users in the DE file, but we did not identify users in the OT file.	 The state reported section 1915(i) HCBS state plan option expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported section 1915(k) Community First Choice managed care expenditures in the CMS-64, but but we did not identify managed care users or expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported section 1915(i) HCBS state plan option users in the DE file, but we did not identify users in the OT file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(k) Community First Choice FFS users in the OT file, but the state did not identify users in the DE file. 	users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported section 1915(k) Community First Choice managed care expenditures in the CMS-64, but but we did not identify managed care users or expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified state plan private duty nursing services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(k) Community First Choice FFS users in the OT file, but the state did not identify users in the DE file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Texas (cont)		 We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(k) Community First Choice FFS users in the OT file, but the state did not identify users in the DE file. 		
Utah	Utah did not provide any notes.	 A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. Dual eligibility code in the TAF is of high concern due to missing values or not having any beneficiaries in an expected category. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported mental health facility expenditures in the TAF. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify 	 Procedure code for professional services in the OT file is of high concern, and this could have impacted the identification of state plan personal care service users. Dual eligibility code in the TAF is of high concern due to missing values or not having any beneficiaries in an expected category. A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking type tracking payment. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. 	 A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. Dual eligibility code in the TAF is of high concern due to missing values or not having any beneficiaries in an expected category. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported mental health facility expenditures in the TAF. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Utah (cont)		FFS users or FFS expenditures in the TAF.	 The state reported mental health facility expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan personal care services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the CMS-64, but we did not identify expenditures in the TAF. 	users or FFS expenditures in the TAF. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF.
Vermont	Vermont did not provide any notes.	 OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. OT files have a high percentage of FFS claims with zero, missing, or negative payment amounts. A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking 	 OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. OT files have a high percentage of FFS claims with zero, missing, or negative payment amounts. A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking 	 OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. Primary language in the TAF is of high concern due to

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Vermont (cont)		 type codes, or are missing service tracking payment. Primary language in the TAF is of high concern due to differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. A high percentage of beneficiaries have a missing ZIP code in the DE file. The state did not operate any section 1915(c) waiver programs in 2019, but we identified users with section 1915(c) waiver program claims. The state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file. 	type codes, or are missing service tracking payment. A high percentage of beneficiaries have a missing ZIP code in the DE file. Vermont did not operate any section 1915(c) waiver programs in 2020, but we identified users with section 1915(c) waiver program claims. The state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file.	differing categories compared to the ACS, a high percentage of beneficiaries with missing English proficiency, or the percentage of beneficiaries with limited English proficiency differing substantively from ACS. A high percentage of beneficiaries have a missing ZIP code in the DE file. The state reported state plan rehabilitative services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. Vermont did not operate any section 1915(c) waiver programs in 2021, but we identified users with section 1915(c) waiver program claims. The state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Virginia	Virginia did not provide any notes.	We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64.	 We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported PACE expenditures in the CMS-64. The state reported PACE users in the DE file, but we did not find PACE expenditures in the TAF. 	We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64.
Washington	Washington did not provide any notes.	 LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. LT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. OT files have a high percentage of managed care encounters with zero, missing, or negative payment amounts. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified state plan rehabilitative services FFS 	 LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. A high percentage of service tracking claims have problematic MSIS ID values, are missing service tracking type codes, or are missing service tracking payment. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. We identified state plan rehabilitative services FFS users and FFS expenditures in the TAF, but the state did 	 A high percentage of expenditures do not link to an eligibility record in the month of service. LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified state plan rehabilitative services FFS

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Washington (cont)		users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. • We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. • We identified section 1915(k) Community First Choice users in the OT file, but the state did not identify users in the DE file.	not report expenditures in the CMS-64. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. We identified section 1915(c) waiver program users in the OT file, but the state did not identify users in the DE file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(k) Community First Choice users in the OT file, but the state did not identify users in the DE file.	users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. • We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. • We identified section 1915(k) Community First Choice users in the OT file, but the state did not identify users in the DE file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
West Virginia	West Virginia did not provide any notes.	 OT files are of concern because they have high volumes of CMC header records compared with other states. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. 	We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.	 We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility DSH expenditures in the CMS-64, but we did not identify expenditures in the TAF. The state reported mental health facility expenditures in the TAF. The state reported mental health facility expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file.
Wisconsin	Wisconsin did not provide any notes.	 LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. The state reported mental health facility expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified PACE users and expenditures in the TAF, but the state did not 	 LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported mental health facility expenditures in 	 LT files are of concern due to a large difference in FFS expenditures for institutional long-term care services between TAF and the CMS-64 data. We identified section 1915(i) HCBS state plan option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The state reported mental health facility expenditures in

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Wisconsin (cont)		report expenditures in the CMS-64. The state reported state plan personal care services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan private duty nursing services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the OT file, but we did not identify users in the OT file.	the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported PACE expenditures in the CMS-64, but we did not identify users or expenditures in the TAF. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the DE file, but we did not identify users in the OT file.	the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. The state reported state plan personal care services expenditures in the CMS-64, but we did not identify FFS users or FFS expenditures in the TAF. We identified section 1915(i) HCBS state plan option users in the OT file, but the state did not identify users in the DE file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. The state reported MFP demonstration services users in the DE file, but we did not identify users in the DE file, but we did not identify users in the DE file, but we did not identify users in the OT file.
Wyoming	Wyoming indicated that they do not have a section 1915(j) self-directed PAS option. However, 2020 section 1915(j) self-directed PAS option expenditures for Wyoming are	The state reported PACE expenditures in the CMS-64. The state reported PACE users in the DE file, but we did not find PACE expenditures in the OT file.	We identified section 1915(j) self-directed PAS option FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64.	The Medicaid Managed Care Enrollment Report shows PACE users. The state reported PACE users in the DE file, but we did not find

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Wyoming (cont)	included in the output because the state had TAF claims that met the criteria for this service category. • Wyoming indicated that their 2020 section 1915(c) waiver program expenditures were lower than expected. These expenditures may be underestimated when compared to other reports and/or data sources. Wyoming indicated that the section 1915(j) self-directed PAS option expenditures in 2020 should be categorized as section 1915(c) waiver program expenditures. • Wyoming indicated that their 2020 state plan home health services expenditures were higher than expected and section 1915(c) waiver program expenditures might be captured under state plan home health services expenditures erroneously. These expenditures may be overestimated when compared to other reports and/or data sources. • Wyoming indicated that their 2020 state plan case management services expenditures were higher than expected and section 1915(c) waiver program expenditures were higher than expected and section 1915(c) waiver program expenditures		 We identified state plan personal care services FFS users and FFS expenditures in the TAF, but the state did not report expenditures in the CMS-64. The Medicaid Managed Care Enrollment Report shows PACE users. The state reported PACE users in the DE file, but we did not find PACE expenditures in the OT file. We identified section 1915(j) self-directed PAS option users in the OT file, but the state did not identify users in the DE file. 	PACE expenditures in the OT file. The state reported PACE expenditures in the CMS-64. The state reported PACE users in the DE file, but we did not find PACE expenditures in the OT file.

State	State feedback notes on expenditures	2019 data quality notes	2020 data quality notes	2021 data quality notes
Wyoming (cont)	might be captured under state plan case management services expenditures erroneously. These expenditures may be overestimated when compared to other reports and/or data sources.			

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