

Date: May 12, 2026

To: Managed Care Organizations (MCOs)

From: Anna Lea Cothron, System Transformation Director, TennCare

Subject: Personal Outcome Measures (POM) Survey Requirements

This memo provides an overview of recent updates to the Money Follows the Person (MFP) Workplan, including changes to required benchmarks such as the Personal Outcome Measures (POM) survey.

CMS requires all states to implement the HCBS Quality Measure Set as part of federal quality oversight. Meeting this requirement is also a core component of Tennessee's MFP program operations. To fulfill these expectations, Tennessee adopted the Council on Quality and Leadership (CQL) Personal Outcome Measures (POM) as part of the HCBS Quality Measure Set. POM interviews have been integrated into existing operational practices for members enrolled in the 1115 demonstration, using the same methods already in place for 1915(c) waiver members. This alignment strengthens overall quality oversight and ensures consistent evaluation of personal outcomes for individuals participating in MFP and other HCBS programs.

Training and certification are required for staff to conduct POM interviews in accordance with CQL standards. Tennessee has allocated up to \$25,000 per MCO (for a total of \$75,000) to reimburse costs associated with certifying up to eight staff per MCO. These estimates account for staff turnover and ongoing maintenance of certifications.

To support implementation and ensure completion of required POM interviews, the State will provide incentive payments of \$200 per completed interview. MCOs will be funded for up to 200 interviews for a combined total of \$40,000. The specific MCO sample size will be sent as an attachment to this memo. The total incentive amount will be paid upon completion of surveys.

The total number of interviews required for MCOs has been reduced by half compared to the previous survey cycle. This change reflects feedback about administrative burden and the shortened timeline, which is now 12 months instead of 24.

To ensure compliance with POM survey requirements, each MCO must submit a project plan that addresses the following components:

- Estimated number of surveys to complete monthly to meet the 12/31/26 deadline
- Approach for providing ongoing coaching to POM-certified staff to ensure interviews are conducted with fidelity
- Process for reviewing POM interview data, including who will review it and how often
- Communication plan(s) to ensure appropriate outreach to members and the "person who knows the member best"
- Plan for addressing oversampling if needed
- Crosswalk with Basic Assurance Providers to identify opportunities to obtain surveys for members who may already be included in the sample
- Timeline and process for staff recertification

Upon receipt, each MCO will receive \$15,000, for a total of \$45,000, to support implementation of the project plan

(i.e. provide coaching and administrative assistance). The request for the project plan will be issued through TOPS and will be due 30 calendar days from the date of this memo.

Thank you for your continued partnership and for the work your teams are doing to strengthen quality oversight. Please let me know if you have any questions or would like to discuss any of this information further.

Please contact Anna Lea Cothron, anna.l.cothron@tn.gov if you have questions or need more information.

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