

## Functional Assessments for Long-Term Services and Supports (LTSS)

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Medicaid and CHIP Payment and Access Commission Kristal Vardaman



### Overview

- Functional eligibility for Medicaid-covered LTSS
- Uses of functional assessment tools
- Federal requirements and initiatives
- State variation and rationale for research
- Results of NORC inventory
- Additional MACPAC analyses including state interviews
- Discussion of potential for a national assessment tool

# Eligibility for LTSS Users is Based on Finances and Functional Needs



- In most states, individuals eligible for Supplemental Security Income (SSI)
  are automatically eligible for Medicaid if they meet functional eligibility
  criteria.
- States can use other eligibility pathways to cover individuals who have LTSS needs but whose incomes are too high for them to be eligible through the SSI-related pathway.
  - Some of these pathways use the SSI-related functional eligibility criteria, and others use state-established level of care criteria.

# Functional Assessment Tools Have Two Uses

### Eligibility determination

 Functional assessment tools collect information on applicants' health status and needs to determine their functional eligibility for Medicaid-covered LTSS.

### Care planning

- Information from functional assessments can be used to inform the care planning process, such as which specific LTSS services will be delivered and at what quantity.
- States may use the same tool used for eligibility determination or a different tool.

## Federal Requirements for **Assessment Tools**

Federal laws and regulations do not require the use of specific functional assessment tools.

- Federal laws do require:
  - assessments to determine nursing facility eligibility must be under the direction of a physician;
  - nursing facilities must conduct comprehensive assessments;
  - individuals with intellectual disabilities must have physician certification for an intermediate care facility;
  - states using the Community First Choice option must use a person-centered care plan based on an assessment of functional need; and
  - in states with managed LTSS, plans must use tools that assess physical, psychosocial, and functional needs.

## States Vary in the Tools They Use

- The lack of federal requirements contributes to wide variation among states in the functional assessment tools they use.
- States take several approaches in developing functional assessment tools. They can:
  - use a tool developed by another state or by a vendor, without modification;
  - use tool developed by another state or by a vendor, with modification; or
  - create a new tool.

# Variation Makes it Difficult to Compare Across States

- Variation makes it difficult to evaluate how well Medicaid programs are meeting beneficiaries' LTSS needs.
- The 2013 Commission on Long-Term Care recommended a standardized assessment tool be developed to produce a single care plan across care settings.

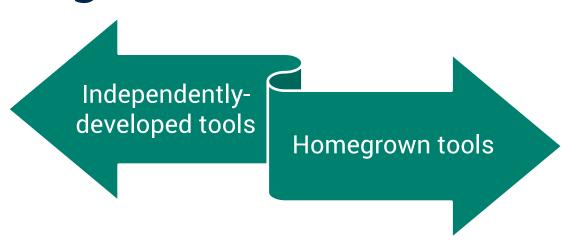
# MACPAC Interest in Assessment Tools

- In its June 2014 report to Congress, MACPAC expressed interest in understanding variation in functional assessment tools.
- At the time, little information was available that documented this variation.
  - Published studies generally focused on a subset of states.
- To better understand current state practices, MACPAC contracted with NORC at the University of Chicago to compile a comprehensive, nationwide inventory of functional assessment tools.

# Inventory Results Raised Questions

- To better understand states' decision making regarding functional assessment tools and why it has resulted in such wide variation, MACPAC staff interviewed Medicaid staff in eight states.
  - Kansas, Massachusetts, Maryland, Minnesota,
     Mississippi, Nebraska, Ohio, and Wyoming
- States were selected to represent a mix of those using homegrown and independently-developed tools, as well as states currently in the process of selecting (or creating) a new tool.

# Factors States Consider When Selecting Tools



- States had various reasons for choosing an independently-developed tool or creating their own.
  - Independently-developed tools may ease implementation (e.g. coming with pre-developed training for assessors), but there may not be a clear advantage for one existing tool over another.
  - Homegrown tools allow for more customization and stakeholder input.

# Resources and Organization of LTSS Influences Tool Selection

- States' decisions to implement a new assessment tool, and choice of tool, were often driven by the availability of resources.
  - Two states we interviewed used Balancing Incentive Program funds to implement new tools.
- The way a state organizes delivery of LTSS can lead to the use of multiple tools.
  - Different waiver programs may be run by different agencies.
  - Even in the same agency, different staff may be responsible for managing different waivers, leading to the use of multiple tools.

## Advantages of a National Tool

### A national tool could:

- allow for comparisons of use that reflect similar levels of need;
- improve our understanding of the value of services; and
- reduce state resources used to develop new tools.

## Disadvantages of a National Tool

### A national tool could:

- pose a burden to states that have recently invested in new tools;
- be difficult to select as there is no clear nationally preferred tool; and
- face a challenge of meeting the needs of a rapidly changing LTSS landscape.

# Changes in the LTSS Landscape Make Selecting One Tool Difficult

# The Commission did not recommend a national tool at this time.

- We are in a period of rapid change in LTSS.
  - States are continuing to expand the use of managed care for LTSS.
  - The Centers for Medicare & Medicaid Services is testing new approaches to functional assessment and the electronic exchange of care plans through the Testing Experiences and Functional Tools demonstration.
- It seems prudent not to move to a national assessment tool until we can learn more from existing tools and approaches.



## Questions?

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# LTSS Assessment Tools in Use in State Medicaid Programs

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### Overview

- LTSS Assessment Tool Inventory
  - Planning and methods
  - Data collection template
  - Collection, compilation, and analysis
  - Findings
- Experience from the District of Columbia's Medicaid program
  - Context and impetus for reform
  - Planning and approach
  - Development and stakeholder engagement
  - Implementation



## LTSS Assessment Tool Inventory



### Planning and methods

- Overall approach to data collection was adaptive and relied on publicly available documents
  - Common sources included public-facing program materials, state websites, waiver applications, and other documents
  - Used a snowball approach to identify additional materials
- Data were compiled using a data collection tool developed by NORC and MACPAC
- Availability and timeliness of public information was a known limitation



### Data collection template

- With MACPAC, we developed a data collection template designed to capture all variables of interest, such as
  - Populations assessed with the tool
  - Services for which eligibility was determined using the tool
  - Domains included in the tool
  - Information about who used the tool, how it was completed, and how data were stored
  - Information about the source of the tool
- Tested this template with a small number of states
- Used this template to organize compiled information and a master table to assess themes, commonalities, etc.



### Collection, compilation and analysis

- Ongoing compilation of data allowed for refinement of categorical rules for data classification
- Standardized formatting of data template allowed for ongoing tracking of gaps or issues identified in the data
- Some variables were easier to find than others
- Limited outreach to state Medicaid agencies to fill in the most significant gaps, such as tools we could not locate



- Number and types of tools
  - States use an average of about three distinct tools
  - Most states use "home-grown" tools
- Tool uses among services and populations
  - States tend to use different tools for different populations, though also sometimes use service-specific tools (e.g., for a PACE program or a waiver serving a targeted population)
  - Tools are most commonly used across multiple age groups when used for individuals who are elderly and for younger physically disabled adults
  - Independently developed tools appear to be more common among programs for individuals with IDD



- Tool domains and domain contents
  - Most common domains are as expected functional support needs, clinical care needs, and cognitive/behavioral assessment
  - Other domains included might vary by the tool's intended use e.g., psychosocial supports were much more common among tools used for individuals with IDD



- Tool domains and domain contents
  - There is a fair amount of variability across tools in what is captured even in the more common domains. For example:
    - Questions about the frequency and duration of assistance required varied;
    - Some states requested information on the use of adaptive equipment versus personal aides; and
    - One state requested which specific adaptive equipment was used and for which subtasks a beneficiary needed assistance
  - Greater detail may be useful when states are using a tool to develop a care plan in addition to determining eligibility



## District of Columbia:

| 1) Bathing                            |                               |           |         |                    |               |
|---------------------------------------|-------------------------------|-----------|---------|--------------------|---------------|
| 7aa-7ad. How frequently is this       | Minutes per occurrence        |           |         |                    |               |
| activity required and for what        | Times per day                 |           |         |                    |               |
| duration?                             | Days per week                 |           |         | = minutes per week |               |
| 7ba. Type of assistance required      | Required Frequency of Assista |           |         | ince               |               |
|                                       | Never                         | Sometimes | Usually | Always             |               |
| Cueing or supervision                 | (0)                           | (0)       | (1)     | (2)                | Bathing Score |
| Mechanical assistance only            | (0)                           | (0)       | (1)     | (1)                | (7bb):        |
| One-to-one 1:1 person physical assist | (0)                           | (1)       | (2)     | (3)                |               |
| Totally dependent on another person   | (0)                           | (2)       | (3)     | (4)                |               |
| 7c. Observations:                     |                               |           |         |                    |               |

#### Kentucky:

| 4) Is member independent with bathing                       | Comments: |
|---|-----------|
| ☐ Yes ☐No (If no, check below all that apply and comment)   |           |
| ☐ Requires supervision or verbal cues                       |           |
| ☐ Requires hands-on assistance with upper body              |           |
| □ Requires hands-on assistance with lower body              |           |
| □ Requires peri-care  |           |
| □ Requires total assistance                                 |           |
| ☐ Assistance with the use of equipment or assistive devices |           |



- Tool (and/or agency) "infrastructure"
  - Majority of tools still appear to be conducted on paper and not stored in a way that allows for easy data analysis
  - Rare exceptions exist, including states in which data are stored and even linked to other data (such as claims data or other case management data)
  - A number of states are currently engaged in efforts to reform or reshape assessment tools and processes, but this is a long and involved process



### **Experience in the District of Columbia**



### Context and impetus for reform

- The District offers a wide range of LTSS, for multiple specific populations and delivered in a number of different channels
  - The assessment processes for most services were different, using different assessors and different tools
  - The District looked at BIP but was technically ineligible
- The agency was also planning to stand up a brand-new 1915(i) program, and additionally was in the process of addressing some issues within its state plan personal care program that made reforms to the assessment process attractive



### Planning and approach

- Research process
  - Background
  - Working group within the agency
  - Discussions with other states' staff
- Major objectives
  - A multi-domain assessment
  - An assessment that could work for multiple services and/or serve appropriately for multiple populations
  - An electronic / automated assessment and accessible data
- Development and stakeholder engagement



### Implementation

- Phased roll-out by service type
  - State plan PCA
  - Other services
- Automation of tool
  - Implications for process and for data
- Ongoing training and stakeholder engagement
- Other implications for implementation



## Thank You!



