



OLTL Updates LTSS Sub MAAC

March 7, 2024

OLTL Updates

- OLTL Updates
 - Procurement Updates
 - Centers for Medicare & Medicaid Services (CMS) Compliance Site Visit Overview
 - Waiver Redeterminations

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- Procurement Updates
 - There are no updates on the following that can be shared at this time.
 - Agency with Choice (AWC)
 - Community HealthChoices (CHC) Request for Application (RFA)
 - Was posted to e-Marketplace on January 30, 2024.
 - **All questions regarding the RFA and its contents should be directed to Procurement via the resource account RA-pwrfaquestions@pa.gov.**
 - Independent Enrollment Broker (IEB)
 - Contract has been signed by Maximus and is effective January 1, 2024
 - Currently in the signatory process with the state
 - OLTL will be meeting and working with Maximus to implement the provision of the contract

OLTL Updates

- CMS Compliance Site Visit Overview
 - Background
 - CMS conducted their on-site visit to PA from February 26-March 1, 2024.
 - The purpose of the visit is part of CMS' ongoing efforts to provide states with technical assistance regarding the Home and Community-Based Services (HCBS) settings regulations at 42 CFR § 441.301(c)(4)-(5), and to assess implementation of the settings criteria throughout PA's HCBS systems.
 - On-Site Provider Visit
 - OLTL site visits included Landis Homes Adult Day, Woods Services Inc. and Beechwood Neuro Rehab
 - The on-site included individuals from CMS, Administrations for Community Living (ACL), New Editions, state staff, and service coordinators (SCs)
 - Review of Person-Centered Service Plans (PCSPs)
 - Interview with participants and direct service staff

OLTL Updates

- CMS Compliance Site Visit Overview
 - SC Interviews
 - CMS also conducted interviews with SCs to measure their understanding of the HCBS settings rule, including, their role in ensuring compliance and how elements of the rule are incorporated into the person-centered service planning process.
 - Preliminary Findings: Highlights
 - **CMS** provided positive feedback overall on the visit with Pennsylvania and **noted no major concerns** during the review of preliminary findings.
 - **Overall, they found Pennsylvania to have a very person-centered HCBS system.** This was demonstrated through a review of PCSPs, interviews with participants, provider staff and SCs.
 - There were minor findings at the provider sites that OLTL is working to remediate. Remediation may include updates to policies at the provider level.
 - There was also **feedback on the need to demonstrate stronger SC involvement and collaboration** in Residential Habilitation settings.
 - Next Steps
 - CMS will review and debrief on the site visits to develop a findings report to review with the state.

OLTL Updates

- Waiver Redeterminations
 - Ongoing efforts:
 - **OLTL is working with the Managed Care Organization's (MCO)** to identify issues in the assessment process. This includes the MCOs doing analysis to identify issues with the assessment process and retraining of the SCs on the InterRAI as necessary.
 - There will be a focus on participants with traumatic brain injuries (TBI), cognitive issues/dementia and progressive diseases to ensure that all information is being gathered from the participant/family and caregivers. Emphasis on looking at what a participant does and needs throughout the day
 - SCs are also trained on reviewing past InterRAIs to compare the participant's needs over time.

OLTL Updates

- Waiver Redeterminations

- Ongoing efforts:

- The number of participants who were assessed Nursing Facility Ineligible (NFI) by MCO for the time period of May 2023 through January 2024.

MCO	May '23	Jun '23	Jul '23	Aug '23	Sep '23	Oct '23	Nov '23	Dec '23	Jan '24	Total
AH/KF	726	713	659	356	308	280	314	220	215	3791
PHW	146	156	123	94	80	115	79	45	53	891
UPMC	833	795	723	627	367	445	334	245	217	4586
Total	1705	1664	1505	1077	755	840	727	510	485	9268

Data source: Aging Well NFI Redetermination Report

OLTL Updates

- Waiver Redeterminations

- Ongoing efforts:

- **OLTL is working with Aging Well** to implement several things to address the waiver redetermination process
 - Aging Well is doing a new Functional Eligibility Determination (FED) on participants who were found NFI on the InterRAI and a Physician Certification (PC) was not received within the 60-day timeframe
 - OLTL is working with Aging Well to perform about 4500 cases
 - To date (2/21/2024), they have completed 1370 FEDs on participants in which a PC was not received
 - Of those, 1072 were found to be Nursing Facility Clinically Eligible (NFCE) (78%) and 298 were found NFI (22%)
 - They were unable to reach 289 participants and 129 refused the new assessment
 - Aging Well compiles a continuing list of participants in each category. OLTL is sending the list to the MCOs to follow up on the NFI, unable to reach and refused cases to assist with grievance and appeals, contacting the person and discussing the importance of doing the new FED

OLTL Updates

- Waiver Redeterminations
 - Ongoing efforts:
 - Medical Director Review (MDR) Process
 - OLTL has met internally to discuss and make changes to the MDR review process
 - In the current process, the MDR team reviewed the subset of questions on the InterRAI that mirrored the FED and the PC
 - **As of February 12, 2024, OLTL has directed the MCOs to upload the full InterRAI and SC notes and the team will review the added documentation along with the PC**
 - OLTL Medical Director will review 100% of the cases for a 30-day period (mid Feb to mid Mar) to determine if further changes need to be made in the review process
 - In January 2024, the team reviewed 260 cases and found 74 (28.4%) participants NFCE. This is a marked increase over December 2023.
 - In February 2024, the team found 44% of the participants NFCE, which is a significant increase from January 2024.

OLTL Updates

- Waiver Redeterminations
 - Participants who did not appeal
 - The updated data as of February 26, 2024, is 1231. The increase from the 900+ number is due to the fact that it only included closed cases and not pending ones.
 - These cases are being sent to the respective MCOs for follow up.
 - For AHC/KF, of the 134 participants on the report:
 - 95 participants were active still with AHC/KF.
 - 40 participants are NFI-duals.
 - The remaining participants either termed, transitioned to another CHC MCO, HC, or to the LIFE Program. Our team will continue to make the additional outreaches to the participants who we were unable to reach.

OLTL Updates

- Waiver Redeterminations
 - Participants who did not appeal (continued)
 - For UPMC, of the 324 Participants provided in this report:
 - 202 are still active with UPMC CHC.
 - 131 are NFI – we are working to outreach to this group and are assisting with how to file an appeal if desired.
 - 71 are HCBS and do not have a waiver end date per eCIS.
 - 117 are fully termed from UPMC and have termination dates from June 2023 to October 2023.
 - For PHW, of the 110 participants on this report
 - 63 are still active with PHW.
 - 38 are NFI and PHW is reaching out to them to assist with appeal if needed.
 - 21 are HCBS and getting services.
 - 4 are in a NF.

Questions?

