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Transcriber's note. File. E text - Appendix Z On-Site Review Team Orientation Session.pptxs. AHCCCS, Arizona Health Care Containment System. **Return to text.**

Note

1. Bullets were retained for this document.

Assessment Team Training

September 2016

Housekeeping

- Please mute your phones, *6
- Question and answer sessions will be held at designated times throughout the presentation
- Use the chat function to write your question. Please include the slide **number** or page **number**.

AHCCCS staff will call upon you

Agenda

- **HCBS** Rules Overview
- Systemic Assessment Process

 Heightened Scrutiny
 Sub bullet. Memory Care Units or Communities
 Sub bullet. Farmstead Communities **Sub bullet.** Assessment Process

Sub bullet. Assessment Tools

HCBS Rules Overview

Intent of the HCBS Rules

• Purpose

Sub bullet. Enhance the quality of HCBS

Sub bullet. Provide protections to participants

Sub bullet. Assure full access to benefits of community living

- Receive services in the most integrated and least restrictive setting possible
- Receive services to the same degree of access as individuals not receiving HCBS
- Scope

Sub bullet. Licensed settings Residential and Non Residential

Arizona's Opportunity

- New standard set of basic rights afforded to all members
- Reinforce priority of serving members in the most integrated and least restrictive setting
- Formalize new priority to ensure members are actively engaged and participating in their communities

Figure. Table. Placement, December 2015

Setting	Members	percent of Membership
Own Home	39,587	68 percent
Assisted Living Facility	6,120	11 percent
Group Home	2,838	5 percent
Developmental Home	1,346	2 percent
Total of HCBS Placements	49,891	86 percent
Skilled Nursing Facility	7,202	12.5 percent
Other	760	1 percent
ICF, ID	130	.3 percent
Behavioral Health Residential Facility	108	.2 percent
Total of Institutional Placements	8,200	14 percent
Total	58,091	100 percent

Settings that, are not, Home and Community Based

- A nursing facility
- An institution for mental disease
- An Intermediate Care Facility for individuals with intellectual disabilities
- A hospital
- Any other locations that have the qualities of a institutional setting, as determined by the Secretary

Settings

• Residential Setting.

Sub bullet. Assisted Living Facilities, Home, Center, Adult Foster Care

Sub bullet. DDD Group Homes

Sub bullet. DDD Adult & Child Developmental Homes

Sub bullet. Behavioral Health Residential Facilities

• Non Residential Settings

Sub bullet. Adult Day Health

Sub bullet. DDD Day Treatment and Training Programs

Sub bullet. DDD Center, Based Employment Programs

DDD Group Supported, Employment Programs

Settings that are, Presumed, to have Qualities of an Institution

- Any setting that is located in a building that is also a publicly or privately operated facility that provides inpatient institutional treatment
- Any setting that is located in a building on the grounds of, or immediately adjacent to, a public institution
- Any other setting that has the effect of isolating individuals receiving Medicaid HCBS from the broader community of individuals not receiving Medicaid HCBS.

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Rules

- 1. The setting is integrated in and supports full access to the greater community, including opportunities to
- a. seek employment and work in competitive integrated settings,
- b. engage in community life,
- c. control personal resources, and
- d. receive services in the community to the same degree of access as individuals not receiving Medicaid HCBS ervices.

Rules

- 2. The setting is selected by the individual from among setting options including
- a. non disability specific settings
- b. an option for a private unit in a residential setting.
- **3.** The setting options are identified and documented in the person centered service plan and are based on the individuals needs, preferences, and, for residential settings, resources available for room and board.
- 4. Ensures individual rights of privacy, dignity and respect, and freedom from coercion and restraint

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Rules

- **5.** Optimizes, but does not regiment, individual initiative, autonomy and independence in making life choices including but not limited to, daily activities, physical environment, and with whom to interact
- **6.** Facilitates individual choice regarding services and supports and who provides them.

Rules

- 7. In a provider owned or controlled home and community based residential settings, the following additional requirements must be met.
- a. The individual has a lease or other legally enforceable agreement providing similar protections,
- b. The individual has privacy in their sleeping or living unit including.

Sub bullet. Lockable doors by the individual with only appropriate staff having keys to the doors

Sub bullet. Individual sharing units have a choice of roommates in that setting

Sub bullet. Freedom to furnish or decorate the unit within the lease or agreement

- c. The individual has freedom and support to control his or her own schedules and activities including access to food at any time
- d. The individual can have visitors at any time, and
- e. The setting is physically accessible.

Person Centered Planning

Rights, may be limited, on a case by case basis, if they jeopardize the health and safety of the member and or others. The following requirements must be documented in the person centered plan.

- Identify a specific and individualized assessed need
- Document the positive interventions and supports used prior to any modifications to the person centered plan
- Document less intrusive methods of meeting the need that have been tried but did not work
- Include clear description of the condition that is directly proportionate to the specific assessed need.

Person Centered Planning, Continued

- Include regular collection and review of data to measure the ongoing effectiveness of the modification
- Include established time limits for periodic reviews to determine if the modification is still necessary or can be terminated
- Include the informed consent of the individual
- Include an assurance that interventions and supports will cause no harm to the individual

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Summary

- Rules are basic rights afforded to all members
- Its not just about the location of where the services are provided, but its about the, individual's experience and outcomes,
- All residential and non residential settings must be compliant or come into compliance by the end of the transition period
- Rights may be limited, on a case by case basis, if they jeopardize the health and safety of the member and or others

Sub bullet. Must be documented in the service plan

Sub bullet. Strategies developed and monitored to restore rights

Systemic Assessment Process October 2015, Submitted to C M S

Systemic Assessment

• Review and evaluation of standards and requirements for setting types

Sub bullet. Arizona Revised Statutes

Sub bullet. Arizona Administrative Code

Sub bullet. AHCCCS and M C O Policy

Sub bullet. AHCCCS Contracts with M C Os

Sub bullet. M C O contracts with providers

Why a Systemic Assessment?

- All services are provided under the 1115 Wavier authority
- Licensing rules create uniform standards across settings
- Working knowledge and understanding of the operations for each setting type
- Important to assess the "system" and not just providers

Systemic Assessment Process

- Assessed each specific rule requirement for each setting type
- Answered the question "What is culturally normative for individuals not receiving Medicaid HCBS?"
- Utilized exploratory questions provided by C M S

Systemic Assessment Process

- Only captures what is outlined on paper
- Includes policies that are not specific to the setting type, i. e. role of the Case Manager
- The HCBS Rules may be implemented in practice and that will be evaluated as part of the on site visit

Systemic Assessment Findings

• All setting types, currently do not comply with all of the HCBS Rules and, therefore, require remediation strategies to come into compliance with two exceptions

Systemic Assessment Findings

Compliant, The minimum standards of the rule requirements have been met
Compliant with Recommendations, The minimum standards of the rule have been met and, in addition, it was determined that a remediation strategy was in order to exceed the standards and meet the intent of the rule
Partial Compliance, Some of the minimum standards of the rule requirements were met
Not Compliant, The minimum standards of the rule requirements were not met

Programs Non Residential

Grand Totals

Total

Figure. Table. Systemic Assessment Findings

Residential Settings

Residential Settings	S					
Setting	Compliant	Compliant with	Partial		mpliant	Totals
		Recommendations	Compliance			
Assisted Living	5	3	6	1		15
Facilities						
Group Homes	5	5	5			15
Adult and Child	5	5	5			15
Developmental						
Homes						
Behavioral						
Health						
Residential						
Facilities						
Residential Total	15, 34 percent	13, 28 percent	16, 36 percent	1, 2 per	cent	45
Non Residential Settings						
Adult Day Health	1		4	4	9	
Facilities						
Day Treatment	2	2	4	1	9	
and Training						
Programs						
Center Based	2	1	4	2	9	1
Employment						
Programs						
Group Supported	7	2			9	
Employment						
D.				1		

12, 33 percent

28, 35 percent

7, 20 percent

8, 10 percent

36

81

5, 14 percent

18, 22 percent

12, 33 percent

27, 33 percent

Heightened Scrutiny

What is Heightened Scrutiny?

- States use this process to preserve settings that are presumed to have institutional qualities and presumed not be compliant with HCBS Rules
- Process created for states to gather and submit evidence for settings to C M S to make a determination
- C M S determines whether or not the evidence supports the setting is or can become compliance by the end of the transition period
- If C M S determines the setting does not or cannot meeting the compliance standards, Medicaid funds cannot be used.

Memory, Dementia Care Settings

• Nature of the Facilities

Sub bullet. Secure perimeter and delayed egress

Sub bullet. Interactions with the general community are typically limited to activities at the facility

• Settings

Sub bullet. 79 Memory Care Units or Communities

Sub bullet. 1002 members receiving services

Memory, Dementia Care Settings

Assisted Living Facilities that are licensed as Assisted Living Centers but include a unit within the setting which provides care to individuals with memory care needs and is licensed at directed care **Foot note** *

Begin foot note. *, Directed Care Services according to A R S Subsection 36.401.A.15 "means programs and services, including supervisory and personal care services, that are provided to persons who are incapable of recognizing danger, summoning assistance, expressing need or making basic care decisions."

Farmstead Communities

• Nature of the Settings

Sub bullet. Rural areas on large parcels of land

Sub bullet. Interaction limited to other individuals with disabilities and or staff and onsite activities

• Settings

Sub bullet. 1 Farmstead Community

Sub bullet. 8 Members receiving group home and day program services

Assessment Process

Overview

- Statistically significant number of settings were randomly selected
- On site assessments were created by a multi stakeholder multi disciplinary workgroup

Figure. Table. On Site Assessments

Transport		Taradiana	A 1 O 1 I 1
Team number	number of Sites	Locations	Assigned Organizational Lead
1	2	Lakeside, Navajo County, and	UnitedHealthCare
		Vernon, Apache County	
2	3	Flagstaff, Coconino County,	UnitedHealthCare
		Cottonwood and Prescott, Yavapai	
		County	
3	3	Lake Havasu City, Mohave County	UnitedHealthCare
4	3	Kingman and Bullhead City, Mohave	AHCCCS
		County	
5	2	Tucson and Green Valley, Pima	Mercy Care Plan
		County	
6	2	Tucson, Pima County	Mercy Care Plan
7	4	Phoenix, Maricopa County	UnitedHealthCare
8	3	Mesa, Maricopa County, and Apache	Bridgeway Health Solutions
		Junction, Pinal County	
9	4	Mesa, Maricopa County	Bridgeway Health Solutions
10	3	Chandler and Gilbert, Maricopa	Mercy Care Plan
		County	
11	3	Glendale and Youngtown, Maricopa	Mercy Care Plan
		County	
12	4	Surprise, Sun City West and Peoria,	Mercy Care Plan
		Maricopa County	
13	4	Phoenix, Maricopa County	UnitedHealthCare
14	3	Scottsdale and Carefree, Maricopa	Bridgeway Health Solutions
		County	
15	3	Tucson, Pima County, and Chandler,	AHCCCS
		Maricopa County	
16	4	Mesa and Glendale, Maricopa County	AHCCCS

On Site Assessments

• Not,

Sub bullet. Intended to assess compliance of individual settings.

Sub bullet. A licensing or monitoring review

- Process created for states to gather and submit evidence for settings to C M S to make a determination
- C M S determines whether or not the evidence supports the setting is or can become compliance by the end of the transition period
- If C M S determines the setting does not or cannot meeting the compliance standards, Medicaid funds cannot be used.

Assessment Teams

- Led by AHCCCS or M C O
- Representatives include.

Sub bullet. Case Management

Sub bullet. Quality Management

Sub bullet. Provider Relations

Sub bullet. Community Members Foot note *
Begin foot note. *Must sign a confidentiality agreement

Team Member Responsibilities

- Attend at least one training
- Participate in all of on site assessments assigned to the Team
- Conduct one of the on site assessment components
- Participate in a post assessment meeting hosted by the Team Lead

Team Lead Responsibilities

- Serve as point of contact for the Team Members both on and off site
- Serve as technical advisor to Team Members
- Provide overview of the process and expectations to the facility on the day of the on site assessment
- Ensure all assessment tools are completed
- Convene post assessment meeting to facilitate the completion of the summary of on site assessments
- Submit all completed assessments and summary to AHCCCS

On Site Assessment Schedule, 3 to 4, hours,

- Meet and Greet with Facility Executive Director or Manager
- Facility Tour
- Team Meeting, Review of roles and responsibilities for each Team Member
- Conduct Assessments
- Debrief

Timeline

Task	Timeline	
Conduct training for assessment teams and orientation for facilities	September 2016	
Confirm schedule of assessment visits		
Conduct assessments	October, December 2016	
Draft report and solicit input from Workgroup Members	January 2017	
Solicit public comment	February 2017	
Finalize report and submit to C M S	March 2017	

Assessment Tools

Facility Assessment & Document Review

- The, purpose, of component is to gather information directly from the facility on the extent to which the facility may or may not be currently applying practices consistent with the HCBS Rules.
- The designated, Facility Interviewee, will complete the self assessment and indicate whether or not the, practices are documented in written form, prior to the on site assessment.
- The, Team Member, will be reviewing the self assessment with the facility contact and reviewing documentation that outlines practices in member information, policies and procedures and or staff information and website.

Member Interviews and File Review

- The, purpose, of this component is to gather information directly from the members, or their representatives, regarding the member experience in the facility which may or may not be consistent with the HCBS Rules.
- The, Team Member, will be.

Sub bullet. Contacting members, or their representatives, and completing a survey.

Sub bullet. Reviewing case files for members to gain an understanding of how and if the facility documents 1, member preferences to support limited decision making ability and or 2, individualized health and safety limitations that restrict community integration.

Sub bullet. Observing member and staff interactions and members as they are engaged in individual or group activities. **Side note.** In an effort to secure member protected health information, Community Members are not permitted to conduct this assessment

Observation and Community Interviews

- The, purpose, of this component is to gather information by observing the location, environment and community engagement of the facility to identify characteristics that may or not be consistent with the HCBS Rules.
- The, Team Member, will be responsible for.

Sub bullet. Providing a description of the facility environment and the proximity to the community, i.e. transportation, businesses, churches, et cetera.

Sub bullet. Talking with community members, who have an association with the facility, to gather information about their level of interaction with members in the facility and the strategies the facility employs to maximize community engagement.

Post Assessment Meeting and Summary

• General observations and trends

Sub bullet. Strengths and replicable best practices **Sub bullet.** Weaknesses and proposed solutions for compliance

Sub bullet. Outlier issues and proposed solutions for compliance

Next Steps

- Team Lead, work with Team Members to create schedule of assessments and report schedule to AHCCCS
- AHCCCS, send notice to facilities of the scheduled dates
- AHCCCS, post training on website (www.azahcccs.gov/hcbs)

Thank You

End of material.