

EMAIL FROM DAVE RICHARD, DEPUTY SECRETARY / NC MEDICAID

From: Richard, Dave

Sent: Friday, November 16, 2018 4:17 PM

Subject: Independent Assessment in the CAP/C Program

Thank you for your comments regarding the proposed changes to the CAP/C waiver, specifically the use of an independent assessment entity (IAE) to determine waiver eligibility in CAP/C. Your input is valuable as we consider the best approach to meet the needs of individuals on the waiver, adhere to CMS regulations and provide quality oversight of the CAP/C waiver.

From our listening sessions, our CAP/C Advisory Committee and direct comments through e-mail, we heard several concerns about this approach from stakeholders, including:

Disruption of continuity of care

- Frequent transfer of information from independent assessors and case managers putting important information-sharing at risk
- Service reduction due to assessor's unfamiliarity with the beneficiary
- Having a variety of assessors/caregivers in their homes
- Question if an IAE is independent since approving would include additional work

At an ad hoc CAP/C Advisory Committee meeting held November 14, 2018, members asked Medicaid to consider the following additional points:

- An IAE may not be able to provide statewide coverage, including remote locations
- The emotional state of family/caregivers when they are required to tell their stories repeatedly
- An alternative would be that case management entities (CMEs) perform all assessments and turn information over to the IAE for approval

During the committee meeting, Medicaid suggested an approach that we believe addresses most of the concerns of the members and the requirements of the Medicaid program as follows:

- IAE completes the initial eligibility determination
- CME completes the annual and Change of Status (COS) assessments
- IAE conducts the quality oversight of annual and COS assessments completed by CME
- IAE conducts the initial assessment for all waiver participants to ensure the baseline data for future assessments performed by the CME
- IAE conducts quality assurance activities on all aspects of waiver services and eligibility
- Medicaid assures compliance to contract requirements and waiver assurances

Our staff is reviewing the alternatives discussed at the CAP/C Advisory Committee and plan to convey our recommendation to the Advisory Committee and stakeholders no later than December 1, 2018.

Again, thank you for your comments.

Dave

Dave Richard
Deputy Secretary
NC Medicaid

Division of Health Benefits
[NC Department of Health and Human Services](#)

Office: 919-855-4101
Mobile: 919-500-1596
dave.richard@dhhs.nc.gov

1985 Umstead Drive, Kirby Building
2501 Mail Service Center
Raleigh, NC 27699-2501

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