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TO: Elena Nicolella, Medicaid Director, EOHHS
FR: Brian McKaig, State Director, Caregiver Homes™ of Rhode Island
RE: Testimony on RI Medicaid 1115 Waiver Extension Request
DA: February 11, 2013

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Caregiver Homes of Rhode Island is pleased to offer comments on the Executive Office of Health and Human Services' (EOHHS) Proposed 1115 Waiver Extension Request to the Centers for Medicare & Medicaid Services (CMS). We appreciate the opportunity to comment on behalf of the consumers and caregivers to whom we provide critical supports through the Rite @ Home program, and the thousands of other Rhode Islanders who could benefit from the broader availability of Rite @ Home and other home and community-based long-term services and supports (LTSS).

We are pleased, of course, that the proposed Waiver Extension Request continues the availability of home and community-based services including, specifically, Supported Living Arrangements (aka Shared Living, Rite @ Home). As you know, Caregiver Homes has been a significant participant in Rhode Island's efforts to implement this model of care, which provides person-centered supports and assistance with activities of daily living in a home of the consumer's choice from a qualified caregiver of the consumer's choice.

Rhode Island now has more than two years' worth of experience administering this program. Caregiver Homes has compiled and shared information on our experiences over those two years; we have provided demographic and outcome data, as well as information on our best practices, including our extremely effective falls risk screening program, with EOHHS staff, the Long Term Care Coordinating Council, and others. It is clear that, working collaboratively with providers, the State has developed a cost-effective model for supporting consumers with complex conditions at home, and reducing unnecessary nursing facility admissions. The nationally syndicated PBS television show Need to Know recently featured Rite @ Home as an innovation in long-term care. **The Rite @ Home program is one of the success stories of the first Waiver Demonstration period, producing demonstrable and predictable cost savings for the State, and providing a real choice for Rhode Islanders who seek a comprehensive alternative to costly nursing facility services.**

We have been pleased to partner with the State in the successful development of the Rite @ Home program and, in that role, have raised concerns when we believe administrative processes are inconsistent with program goals and negatively impact consumers and their families. For example, we questioned inconsistencies in eligibility determination processes for similarly-situated consumers, and raised concerns regarding resource levels, timelines, and requirements that we believe have unnecessarily constrained and delayed access to the program for eligible consumers. On behalf of consumers and their families, we are disappointed that the State has proposed to continue, rather than remedy, these inconsistencies in the proposed Waiver Extension. **We urge EOHHS to modify its "fast track" eligibility proposal to include Rite @ Home as a benefit that would be available to consumers.**

The proposed Extension Request acknowledges that the State's nursing facility diversion efforts have not yielded expected results. To be successful, proposals to avoid costly institutional care must be comprehensive, responsive to the real needs of consumers at a facility level-of-care, and accessible without delay at the time consumers and their families are making critical decisions regarding long-term care. Rlte @ Home is a comprehensive, developed, and proven model for supporting medically and behaviorally complex consumers at a facility level-of-care. With appropriate State support, including making the benefit available to eligible "fast track" consumers, the model can be accessible at the right time for more Rhode Islanders.

We have sufficient evidence regarding the consumers who have accessed the Rlte @ Home program to-date, including their living and caregiving situations before they applied for participation in the program. We can predictably forecast who will be eligible, and are prepared to work with the State to develop a thoughtful and thorough approach to implementation of "fast track" eligibility in Rlte @ Home.

We urge the State to work collaboratively with providers and advocates to provide consumers and caregivers with real choices for community-based care, and to have Rlte@Home take its place as a real option for consumers at a nursing-facility level of care. The Rlte @ Home program can help the State achieve its goals for supporting consumers at home. As important, the broader availability of the benefit will help Rhode Island to rebalance long-term care, realize meaningful cost-savings, and contribute to the State's capacity to meet the growing demand for home-based services.

As a community-based organization with expertise in care coordination for individuals with complex conditions and LTSS needs, we applaud the State for its continued focus on the implementation of a State Demonstration to integrate care for individuals who are dually-eligible for Medicare and Medicaid, and other innovations in the delivery and purchasing of health care that will improve health outcomes for Rhode Islanders. We look forward to working with the State and its health care partners to support the development of the Enhanced PCCM/Community Health Care Team and MCO models and, specifically, to providing input regarding the features that are critical to successful community living.

Thank you again for the opportunity to comment on the proposed Waiver Extension Request.