



**Generations  
Home Care, Inc.**  
Caring for Delawareans since 1968

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June 12, 2013

Ms. Sharon L. Summers  
Planning & Policy Development Unit  
Division of Medicaid and Medial Assistance  
1901 North DuPont Highway  
P.O. Box 906  
New Castle, Delaware 19720-0906

**Policy & Planning**  
**JUN 12 2013**  
**DMMA**

**RE: Diamond State Health Plan  
1115 Demonstration Renewal**

Dear Ms. Summers:

Two staff members from Generations Home Care attended the public hearing on the waiver extension May 22, 2013 and send these comments regarding the 1115 Demonstration Renewal.

Generations Home Care is a licensed not-for-profit home and community-based service provider incorporated in Delaware in 1968. Generations Home Care has a statewide presence, with three county offices, serving Sussex, Kent, and New Castle Counties. Generations has continuously provided care and assistance to Delaware residents in need, regardless of their ability to pay, for over 40 years. We provide services that enable individuals to remain in the familiar surroundings of home through home-based care by a cadre of skilled and experienced professionals. Our services allow elderly and disabled adults to maintain their dignity and independence without ever compromising safety or sacrificing quality of care.

Services and supports offered cover all phases of health maintenance and recovery - whether recuperating from a short-term disability or living with a chronic health condition.

Generations Home Care participates in the Delaware Diamond State Health Plan. Generations joined other community-based providers under this Demonstration April 1, 2012. We strongly support Delaware's request for an extension of its waiver for the period January 1, 2014 through December 31, 2016.



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We believe the waiver will:

- Expand options for those who need long term care by growing home and community based services
- Rebalance Delaware's Long Term Care System
- Promote early intervention for individuals at risk of requiring institutional long term care
- Respect and expand consumer choices

Generations Home Care encourages a partnership between Generations and the Delaware Department of Health and Social Services to fund a new *Residential Supported Living Service*, referred to as *Adult Foster Care Level II*. This program is not a new option for most states. Adult Foster Care Level II, in most states, is a Medicaid-funded home and community-based service for adults with physical disabilities and older adults who can no longer live alone and who otherwise would have no option but to be placed in a nursing facility for lack of alternative community options. All services are provided in a licensed residential home - a home with less than four (4) adults.

*Adult Foster Care Level II* is not a group home model, nor is it Assisted Living. *Adult Foster Care Level II* assists an adult with Activities of Daily Living (i.e. toileting, bathing, feeding, walking, grooming) and/or Instrumental Activities of Daily Living (i.e., shopping, managing medications, budgeting, preparing meals, handling transportation). In addition, the program provides coordination with social activities.

Elderly and disabled adults accepted into the program require *Long Term Care* support, which makes this population appropriate for the Diamond State Integrated Long Term Care Delivery System, which began April 1, 2012. The Diamond State Health Plan Plus already includes this service population: aged and/or disabled individuals over age 18 who meet Nursing Facility level of care, but who prefer to receive home and community-based services as an alternative. Program participants are maintained in the most integrated setting appropriate for their needs. *Adult Foster Care Level II* affords choice in remaining in an alternative residential setting versus entering or remaining in an institution. Plus, it is consistent with the demonstration waiver's objective of controlling expenditures while honoring the preferences of individuals who want to remain in a homelike setting and out of more costly and restrictive institutional settings.

*Adult Foster Care Level II* services are provided under the direction of a licensed Home Health Agency and supervised by a Registered Nurse

and Masters prepared staff with degrees in social work, rehabilitation, psychology or a related field. Further, all Level II sponsors and resident managers have high school diplomas and receive specialized training to meet the needs of the at-risk adult. To assure safety and quality, this program can and should be licensed by DHSS. The process exists today to make this happen and should be included in this application.

Using “Best Practice” models from other states, Delaware can expeditiously implement this new option. Forty-four (44) states use Medicaid funds to support a continuum of home and community-based services, from Assisted Living Residences to Adult Foster Care Homes.

Generations Home Care avidly agrees with DHSS, the provider community, and at -risk individuals, and their families, that it is critical to Delaware to continue the successful implementation of programs and services that rebalance Long Term Care resources. The *Adult Foster Care Level II* program respects individual choice by offering quality, cost-effective, humane, non-institutional alternatives. Would any one of us want anything less for our loved ones and for ourselves?

We sincerely believe Delaware must expand its long term services and supports options in the community. Partnering with CMS and expanded options under the Affordable Care Act and use federal grant money, states can transition Medicaid beneficiaries out of institutions and back to their homes or another qualified community based setting.

Adult Foster Care or rest residential homes with fewer than four unrelated individuals should be a community based option. According to the *Kaiser Family Foundation*, individuals in the Money Follows the Person Program most often transitioned to an apartment setting; Delaware has a shortage of housing settings appropriate for this population. AFC Tier II offers an additional housing setting with support services.

***\*\*Twenty states worked with CMS to reclassify supplemental services as demonstration services to receive the enhanced federal match. Twenty-seven (27) states reported housing to be the most significant issue facing MFP (Money Follows the Person).***

***\*\*Qualified community settings in some MFP demonstrations include a home, apartment, or group home with less than four non related residents. Under the Affordable Care Act (ACA), MFP was***

*extended by five years through 2016 and additional funding was set aside for the demonstration.*

*\*\* As more Medicaid beneficiaries transition to the community, one critical component of a successful community placement is multiple housing options, etc. a program like Adult Foster Care II.*

*\*\*Across all target populations, seniors are the group most likely to be re-institutionalized. This outcome provides an ideal opportunity for Delaware to partner with CMS to support a community option that includes Adult Foster Care II.*

*Housing* remains the biggest challenge facing states in the year ahead. States have repeatedly cited the lack of safe affordable and accessible housing as the biggest barrier to MFP transitions since the demonstration program began in 2008 (*The Kaiser Commission on Medicaid and the Uninsured*).

In a review of the Federal Register Volume 77, Number 38, Monday February 27, 2012, we encourage Delaware to show evidence of the following:

- (1) Stakeholder involvement that includes the medical advisory committee, beneficiaries and diverse provider group representatives and other stakeholders involved in the demonstration; are homecare provider groups at the table?
- (2) Transparency regarding comments made during the public comment period and how these comments were addressed by the State. *How were public comments considered in the Waiver Demonstration extension? Will the state ask for an amendment to the demonstration, etc.?*
- (3) Transparency regarding complaints, how the State reviews and responds to complaints; is this information available for public access?
- (4) Post-approval public forum
- (5) Information on access to the State's evaluation design, including information on the demonstrations' impact of access to care, cost of care, quality of care and how the demonstration impacts the outcome of care; what is the impact on the beneficiary and the provider community; is any group "*harmed*" by the demonstration?
- (6) Public access to the State's draft and final annual reports regarding the extended demonstration.

- (7) *Access to the State's summary of types of grievances and appeals, trends discovered and actions taken or to be taken.*
- (8) Process in which inquiries and comments from the public may be directed to CMS by mail or email.
- (9) Public information on any policy or administrative difficulties in the operation of the waiver extension.
  
- (10) Since the State's Demonstration depends heavily on two Managed Care Organizations, how does the state provide information or access to information on the State's monitoring and supervision of the MCO organizations responsible for much of the demonstration; were policy and administrative actions by the MCO the same or interpreted differently? If not, what is the State's process for corrective action?

In summary, we support Delaware Diamond State Health Plan & Diamond State Health Plan Plus Waiver extension request, especially if it includes more community housing options for beneficiaries.

Sincerely,

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In response to the 1115 Waiver renewal comments submitted by Generations Home Care, Inc on 6/12/2013, DMMA has the following response:

Thank you for your comments. DMMA has adhered to the Federal Requirements for transparency by publishing our renewal request for public comment, holding public hearings, and publishing our responses to any comments received.