

# Model Policy: Ensuring Access to PACE Through the Use of a Streamlined Clinical Eligibility Determination Process

## OVERVIEW

When individuals and their families consider enrolling in PACE, the need to access community-based long-term services and supports often requires that a decision be made quickly to avoid institutional placement. To enroll in PACE, individuals must meet the eligibility criteria of their state for nursing home level of care, regardless of who assumes responsibility for PACE costs. Therefore, it is critical that clinical eligibility determinations be made as quickly and efficiently as possible.

Historically, the timeframes for determining clinical and/or financial eligibility in some states have been lengthy, with the processes taking six weeks or longer. Processes to determine clinical eligibility may involve in-person clinical assessments by state or local government staff who may have difficulty completing timely assessments. However, some states have implemented effective policies to get eligible individuals enrolled in PACE more quickly. Expediting the process comes with risks for the PACE organization and the state, so they should consider the necessary safeguards to protect from unnecessary harm.

## MODEL POLICY<sup>1</sup>

To ensure individuals enrolling in PACE experience a streamlined and expedited eligibility determination process, the state will implement a process allowing PACE organizations to undertake a pre-enrollment screening that involves completing a Level of Care (LOC) form:

- ✦ During the pre-enrollment screening, all PACE organizations will be required to utilize a standard form to be submitted to the state and used by its LOC review team to assess whether an individual meets state criteria for nursing home level of care.
- ✦ The LOC form will be securely submitted electronically to the review team, which will perform an expedited review within five days. The team will make an eligibility determination based on the information provided. All individuals determined Nursing Facility Clinically Eligible will be enrolled in PACE. If the team is unable to certify eligibility based on the information provided by the PACE organization, the team will contact the organization with a request for additional information or, if necessary, deny enrollment.
- ✦ To ensure the accuracy of the LOC assessment pre-enrollment screenings of the PACE organization, the review team will conduct a quarterly audit and randomly select 20 percent of completed initial comprehensive assessments to ensure the information provided in the LOC tool is consistent with the information documented in the comprehensive interdisciplinary team assessments.
- ✦ If the audit results in a finding that the comprehensive assessment does not support the information provided in the LOC tool, the participant is disenrolled retroactively from the PACE organization, and the organization is subject to 100 percent recovery of any capitation received for the months the ineligible participant was enrolled.

<sup>1</sup> This model policy is based on policy that was implemented in California in 2012.