



National
PACE
Association

Model Policy: Ensuring Access to PACE through use of Streamlined Clinical Eligibility Determination Process

Overview

At the point that individuals and their families consider enrolling into PACE, the need to access community-based long-term services and supports often requires a decision be made quickly in order to avoid institutional placement. To enroll in PACE, individuals must meet their state's eligibility criteria 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 these processes taking six weeks or even longer in some states. Processes to determine clinical eligibility may involve in-person clinical assessments by state or local government staff who may have difficulty completing assessments timely. However, some states have implemented effective policies to get eligible individuals enrolled into PACE more quickly. Expediting the process does come with risks for both the PACE organization and the state. The state and PACE organizations should consider the necessary safeguards to protect from unnecessary harm.

Model Policyⁱ

To ensure individuals enrolling in PACE experience a streamlined and expedited eligibility determination process, the state will implement a process to allow PACE organizations to undertake a pre-enrollment screening during which a Level of Care (LOC) form is completed.

- A. During the pre-enrollment screening, all PACE organizations will be required to utilize a standard form which will then be submitted to the state and used by the state LOC review team to assess whether an individual meets the state's criteria for nursing home level of care.
- B. The LOC form will be securely submitted electronically to the state's review team, who will perform an expedited review within five days. The review team will make an eligibility determination from the information provided. All individuals determined Nursing Facility Clinically Eligible by the review team will be enrolled in PACE. If the review team is unable to certify eligibility based on the information provided by the PACE organization, the team will either contact the PACE organization with a request for additional information or, if necessary, deny enrollment.
- C. To assure the accuracy of the PACE organization's LOC assessment pre-enrollment screenings, the state's review team will conduct a quarterly audit and randomly select 20 percent of completed initial comprehensive assessments to ensure that the information provided in the

LOC tool is consistent with the information documented in the comprehensive interdisciplinary team assessments.

- D. If the audit results in a finding that the comprehensive assessment does not support the information provided in the LOC tool, the participant is retroactively disenrolled from the PACE organization, and the PACE organization is subject to 100 percent recovery of any capitation received for the months the ineligible participant was enrolled.

ⁱ This model policy is based on policy that was implemented in California in 2012.