



Public Comments regarding Home and Community-Based Services (HCBS) modernization  
July 17, 2017

Thank you for the opportunity to submit comments regarding HCBS Modernization. Since opening Indiana's inaugural Program of All-Inclusive Care for the Elderly (PACE) in 2015 Franciscan Senior Health & Wellness has proudly served 121 participants. Franciscan Senior Health & Wellness PACE Centers in Indianapolis and Dyer will serve 550 Hoosiers at program maturity.

The PACE model is centered on the belief that it is better for the well-being of individuals with chronic care needs and their families to be served in the community whenever possible. PACE in Indiana currently serves individuals who: are ages 55 or older; certified by their state to need nursing home care; able to live safely in the community at the time of enrollment; and live in a PACE service area. While all PACE participants must be certified to need nursing home care to enroll in PACE, only about seven percent of PACE participants nationally reside in a nursing home. If a PACE participant needs nursing home care, the PACE program pays for it and continues to coordinate the participant's care.

### **Services**

Delivering all needed medical and supportive services, the PACE program is able to provide coordinated, person centered care throughout the entire continuum of care to seniors with chronic care needs while maintaining their independence in their home for as long as possible. Services include but are not limited to the following:

- Primary Medical and Nursing Care
- Occupational, Physical and Speech therapy
- Durable Medical equipment
- Laboratory and diagnostic services
- All necessary prescription medication
- Home care
- Medically necessary transportation
- Adult Day Services
- Structured Family Caregiving
- Assisted Living
- Skilled Nursing Facility care
- Hospitalization
- Nutrition Counseling and meals
- Any other medically necessary service

PACE enables seniors to live as independently as possible by providing truly all-inclusive services. In addition to addressing each participant’s unique medical needs, PACE also helps with the social, emotional and practical challenges that older adults often face. PACE supports caregivers with caregiver training, support groups and respite care to help families keep their loved ones in the community. The PACE 11-member interdisciplinary team of professionals offers guidance, help and support throughout the caregiver journey.

Participation in PACE is voluntary and available to eligible individuals across the financial spectrum. Individuals who qualify for Medicare, all Medicare-covered services are paid for by Medicare. Individuals who also qualify for Medicaid, will pay nothing for the long-term care portion of the PACE benefit. Individuals who do not qualify for Medicaid will be charged a monthly premium to cover the long-term care portion of the PACE benefit and a premium for Medicare Part D drugs. However, in PACE there is never a deductible or copayment for any drug, service, or care approved by the PACE team. At this time, the program serves over 42,000 individuals by 122 PACE organizations operating in 31 states nationally.

Franciscan Senior Health & Wellness currently serves 97 individuals in our two service areas:

**July 2017 Participant Overview**

	<b>Indianapolis</b>	<b>Dyer</b>
<b>Participants Served</b>	87	10
<b>Dual Eligible</b>	84	6
<b>Medicare Only</b>	2	4
<b>Medicaid Only</b>	1	0
<b>Average Days to enroll</b>	71	32
<b>Average Age</b>	76	76
<b>Female</b>	60	6
<b>Male</b>	27	4
<b>In Nursing Facility or Hospital Prior to enrolling</b>	58	3

The Franciscan Senior Health & Wellness PACE program currently provides services to older adults who live in Lake County and the following ZIP codes in Indianapolis, Beech Grove, Greenwood and Franklin in Marion and Johnson Counties: 46201, 46219, 46229, 46203, 46107, 46237, 46239, 46227, 46259, 46142, 46143, 46184, and 46131.

Franciscan Senior Health & Wellness requested additional expansion into Michigan City, serving LaPorte and Porter counties. Franciscan appreciates the continued commitment from the FSSA to expand this HCBS option.

In response to one of the themes in HB 1493:

- Evaluation of the adequacy of reimbursement rates to attract and retain a sufficient number of providers, including a plan to regularly and periodically increase reimbursement rates to address increased costs of providing services.

The 2017 PACE rates per geographic region are:

Rate Category	Indianapolis	All Other Regions
Non-Dual Eligible	\$6,137.08	\$5,929.54
Pre-65 Dual Eligible	\$2,971.81	\$2,871.32
Post-65 Dual Eligible	\$3,035.41	\$2,932.76

Per the Lewin Group report prepared for the Division of Aging December 21, 2015 the approximate cost of Medicaid services for individuals in the A&D program is \$3,400 PMPM (\$1,200 in waiver program costs and \$2,200 in other state plan costs) compared to \$4,500 in a nursing facility.

To help encourage PACE expansion we request that the PACE Pre-65 Dual Eligible and Post-65 Dual Eligible rates be increased to be more in line with Waiver and Nursing facility rates. As the monthly capitation rate is all inclusive this will enable the FSSA to expand HCBS in a budget predictable manner.

Additionally we encourage the FSSA to explore expanding PACE eligibility as authorized by the PACE Innovation Act passed in 2015.

#### **The PACE Innovation Act**

- Allows the Centers for Medicare & Medicaid Services (CMS) to develop pilots using the PACE model to serve those under 55 years of age and those at risk of needing a nursing home. Currently, PACE programs are limited to serving those 55 and older who have already reached the stage of needing a nursing home level of care.
- Encourages CMS to allow operational flexibilities that would support adaptation of the PACE model for new populations and promote PACE growth, efficiency and innovation.

We appreciate this opportunity to provide input and look forward to growing HCBS options for all Hoosiers.

Thank you.