

## Review of HHS Report to Congress on Community First Choice

Medicaid and CHIP Payment and Access Commission Kristal Vardaman



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### Overview

- Background on the Community First Choice (CFC) option
- Review of findings from HHS's recent evaluation report to Congress
- Discussion of potential MACPAC comments



# **Community First Choice**

- Created under the Patient Protection and Affordable Care Act
- Allows states to offer personal attendant services to beneficiaries requiring an institutional level of care under their state plan
- Unique in its focus on self-directed care and institutional level of care requirement



# **Community First Choice**

- Includes attendant and habilitation services for activities of daily living and instrumental activities of daily living
- Beneficiaries engaged in self-directed care can receive training on how to hire, manage, and dismiss attendants
- Offers enhanced federal match of 6 additional percentage points



### **Report summary: Overview**

- As required by statute, in December 2015 the Secretary of HHS submitted a final report on the CFC option to Congress.
- The four states evaluated in the report (California, Maryland, Montana, and Oregon) had approved state plan amendments as of December 31, 2014, and served 306,766 beneficiaries through the CFC option in fiscal year 2014.
- The evaluators also interviewed seven states that did not pursue the CFC option to gain insight on its disadvantages.



# **Report summary: Key findings**

### Advantages of pursuing CFC option

- Opportunity to consolidate some existing waivers
- Enhanced federal match

### **Disadvantages of pursuing CFC option**

- Less flexibility than other long-term services and supports (LTSS) initiatives
- Constraints on administrative capacity



# **Report summary: Key findings**

- Only presents baseline data on health and service use
  - High emergency department use and rates of potentially avoidable hospitalizations demonstrate room for improvement
- States voiced concerns about the capacity of home and community-based service providers, particularly in rural areas



## **Potential Areas for Comment**

#### **Functional assessment tools**

- Some advocates told evaluators that the states' CFC assessment tools do not place enough focus on beneficiaries' strengths and goals.
- MACPAC's June report acknowledges the importance of reflecting the varied needs of different LTSS users in assessment tools.

#### Data availability

- The report demonstrates limitations of available data.
- The Commission could reiterate the need for consistent and timely data to support oversight and policymaking.



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