

Payment Reform Overview

Vermont Department of Disabilities, Aging, and
Independent Living

Developmental Disabilities Services Division

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Goals of Payment Reform

Goals of Payment Reform:

- **Transparent:** Easily described and understood
- **Effective:** Create a payment model that supports people getting appropriate services to meet their needs
- **Equitable:** Resources are made available in a similar way across the state
- **Accountable:** State can identify what services were delivered to people and relate that to payment for services
- **Sustainable:** Pay providers reasonable rates for delivering services

Payment Reform Advisory Groups

Payment Reform Specific Advisory Groups:

Developmental Services (DS) Payment Reform Advisory Committee- 22 Members

- Includes State of VT staff, self-advocates, family members, advocates (DD Council, Legal Aid), and service providers.
- Advise on all payment reform activities; assessments, future payment modeling, encounter data reporting, topics as they arise.

Standardized Assessment Workgroup- 14 Members

- Includes State of VT staff, self-advocates, family members, advocates (DD Council, Bill Ashe) and service providers.
- Advise on assessment specific activities; the selection of an assessment tool, roll out of the Supports Intensity Scale- Adults (SIS-A), drafting of Supplemental Questions, currently working on a document and process to bring more context into the assessment and person-centered planning process.

Additional Advisory Groups:

DS State Program Standing Committee- Between 9 and 15 Members

- Includes self-advocates, family members, advocates (DD Council, VT Legal Aid), and service providers, with regular attendance by State of VT staff.
- Advise the department on the DS System of Care; policies, System of Care Plan, quality and responsiveness of services, redesignation of agencies, hiring of key leadership positions, payment reform, and all major initiatives, including Payment Reform.

DAIL Advisory Board- Between 19 and 24 Members

- People with disabilities and/or older persons, service providers, and advocates, with regular attendance by State of VT staff.
- Advise the commissioner with respect to programs and issues affecting older persons and persons with disabilities.

Additional Engagement Opportunity:

Quarterly Engagement Sessions- Open to the public

- Every quarter DAIL/DS staff and Public Consulting Group (PCG) staff host four open meetings to present information to self-advocates and families/guardians and answer questions or hear feedback.

Important Features of Payment Reform

Independent Assessment of Need

How are needs fairly assessed?

Resource Allocation

How do assessed needs translate into funding?

Service Planning and Delivery

How is the service plan developed, implemented, and monitored?

Payment Model

How does the state pay for services?

Accountability

How does the state track what was provided and ensure needs are met?

Independent Assessment of Need

Vermont is transitioning to the Supports Intensity Scale- Adult assessment (SIS-A)

- Centers for Medicare & Medicaid Services (CMS) requires that we use an independently administered assessment tool to address conflict of interest in case management (the people who assess need should not also deliver the services).
- Developmental Disabilities Services Division (DDSD) chose a standardized tool because it offers an independent assessment of a person's support needs in a reliable, validated format, which will help reduce conflict of interest in services and provide an equitable approach to matching people to the services that fit their individual needs.
- Everyone who receives DDSD Home and Community Based Services (HCBS) will need to have a SIS-A assessment when we come into compliance with CMS' conflict-of-interest (COI) rules.
 - We now know that the timeframe CMS will give us to make these changes is 3 years (the CMS decision was made in 2022, so 2025 will be the transition year).

Conflict of Interest and Payment Reform

Areas Where Payment Reform and Conflict Free Case Management Intersect:

- **Assessments.** CMS requires that the people conducting the needs assessment may not also deliver the services. Using the SIS-A and a third-party assessor will allow us to come into compliance with COI, as well as inform the budgeting process for Payment Reform.
- **Person Centered Plan Development.** This service needs to be separated out from the agencies delivering the services to avoid COI. Payment Reform activities will include recommendations for adding more context into the assessment and person-centered planning process, which will need to be inline with any systems changes that may come out of the COI work.
- **Rates.** If the COI project results in a separate entity or entities providing case management, the rates will need to take the new system design into consideration.
- **Transition Dates.** The Payment Reform and Conflict Free Case Management projects are aligning transition dates to make any large-scale systems and payment model changes at the same time to avoid prolonged periods of change, which would likely be stressful for individuals, families, and providers.

Calendar Year 2023 Goals for Payment Reform

Key Goals for 2023:

- Determine the different levels of support that Vermonters receiving DS services need
 - The current “homegrown” needs assessment breaks need out into 4 categories; None/Minimal/Moderate/Significant. We believe more levels of support may be needed and we can choose the language we want to identify each support type
 - This step in the process identifies similar support needs for groups of individuals based on their needs identified in the SIS-A.
 - The analysis of the sample found similarities based on assessment results and we will decide how many different support levels are needed based on the data.
 - DAIL/DS plans to have the levels of support drafted this spring, after we get input from stakeholders.
- Compare the first and second editions of the SIS A to make sure they are similar
 - The second edition of the SIS-A should be ready for use the first week of march.
 - DAIL/DS will look at approximately 100 second edition assessment results and compare them to the first edition to make sure the assessments don't have significant differences in scoring results.
 - Burns & Associates and HSRI will analyze the assessments and we will share the findings, most likely this summer.

2023 Goals for Payment Reform (continued)

Key Goals for 2023:

- Draft a context document and process to bolster the person-centered planning process
 - Currently working with the Standardized Assessment Workgroup on this project.
 - Will examine if anything in the context process may impact level of support needed or budget needs.
 - Plan to have a draft for review this summer or fall.
- Draft a possible payment model
 - We need to develop the levels of support, context documents, and compare the first and second editions of the SIS A before we can work with our contractors to create the budget framework and present it to stakeholders and ask for input.
 - We will have a process to ask for exceptions if needed and appeal rights will always continue to be available.
 - Our goal is to have payment model drafts in the late fall or winter of 2023.

Current Payment Model

- Agency staff complete a needs assessment, which is still the VT designed tool while the SIS- A is rolled out. There are four levels of support need identified in the current system; None, Minimal, Moderate, Significant.
- Based on the information from the Needs Assessment, agency staff work with the individual and family/guardian to draft a service budget. This budget request is reviewed by the Equity Committee and a final decision is made by the DDS Director.
- Once the final budget is approved, the agency, individual and family/guardian are notified, and an Individual Support Agreement (ISA) for services is drafted based on the budget amount.
- Concerns with the current model include:
 - The varying ways that assessments may be administered due to many different people and agencies are overseeing the process.
 - Experience, education, and skill level of the staff may impact the assessment findings and written funding request for a service budget, potentially leading to inequity in individual budgets for people who have similar needs.
 - It is a conflict of interest to have agency staff complete the assessment of need and propose a budget for services their agency will provide, which is out of compliance with CMS regulation.

Future Payment Model

A future payment model has not been drafted yet, but will include:

- Updated rate study to take current market factors into account
 - Consideration of context in addition to the SIS-A score
 - The ability to request a new SIS-A if needed
 - A process to ask for an exception if the funding is not enough, potentially modeled after the current Equity Committee
 - A way to identify people who will need specialized budgets and services that are based on an established unique or higher level of need
 - An appeal process if the exceptions process did not meet the person's needs (grievance and appeal rights are always in place for Medicaid services and can be accessed at any time)
 - Once a payment model is drafted, DAIL/DS will be able to work with our contractors to project how individual and agency budgets could be impacted. Since this is a budget neutral initiative, the goal is not to reduce the amount of funding in the system, but ensure it is equitably distributed, while planning for instances when we know some consumers will need to request more funding.
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- SIS-A assessment results can be used to inform the level of support needed, the creation of the Individual Support Agreements for consumers, and estimate an individual budget for services.

 - The SIS-A will not dictate the services that will be provided, that will remain a decision for the individual, family/guardian, and staff as they engage in the person-centered planning process.

Timeline

2023

- Continue to get HCBS recipients on a 3-year SIS-A cycle
- Develop additional Context documents and process
- Determine how many levels of support Vermonters need in DS services
- Compare the different editions of the SIS-A
- New rate study
- Draft payment model for input

2024

- Continue to get HCBS recipients on a 3-year SIS-A cycle
- Continue to get input, then finalize the payment model
- Update State and Federal policies and related documents to reflect changes
- Continue to make any needed adjustments based on the COI project

2025

- Finish getting all HCBS recipients on a 3-year SIS-A assessment cycle
- Transition to new Conflict Free Case Management solution
- Transition to a new payment model

Resources

DDSD Payment Reform Information:

- [Payment Reform Information on DDSD website](#)

SIS-A Information:

- [General SIS A Information on the DDSD website](#)
- [Plain Language Document about the SIS A](#)
- [Sample SIS A](#)
- [Videos about the SIS A](#)
- [SIS A information from AAIDD, the creators of the tool](#)

Questions?

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