



**New York State Association of
Area Agencies on Aging**

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Memo in Opposition

Regional Long Term Care Assessment Centers

Statement of Opposition

The New York State Association of Area Agencies on Aging (NYSAAAA) opposes the 2009-2010 Executive Budget's proposal to establish regional long term care assessment centers that would assume the role of the local social services districts and their designees (e.g., CASAs, county long term care offices) to assess an individual's need for long term care services and to authorize such care.

The removal of these functions from local departments of social services, instead of building on their strengths, would:

- further fragment the long term care delivery system
- negatively impact client services
- create more confusion, conflicts and bottlenecks which would lead to increased costs (through excessive and duplicative staff time, longer nursing home stays, etc)

In addition, since the proposed LTC Assessment Centers do not include system enhancements or quality improvement measures, the new system offers no relief to the state, providers or consumers from onerous system inefficiencies.

Instead, major policy and financial efforts should be undertaken to improve the efficiency and effectiveness of the authorization and assessment system. The goal is to develop a broadly integrated infrastructure for community based services, rather than establish regional centers that will further fragment the service delivery system.

We encourage the New York State Department of Health to work with local counties to achieve their vision and goals for the long term care system, without creating another layer resulting in further fragmentation.

Strengths of County-Based Assessments

Under the proposed Regional LTC Assessment Center model, the array of needs that individuals present will not be addressed through a single, integrated service plan. Individuals often simultaneously require service linkages related to mental health, medical, housing, homelessness, entitlement benefits and other financial and supportive service needs. Counties can currently draw on additional non-Medicaid funded components of the home and community based services system, including the Expanded In-home Services for the Elderly Program (EISEP), home delivered meals, respite services and adult day care programs.

Several upstate counties have established central assessment units that provide integrated assessments, Medicaid authorizations and linkages to non-Medicaid supportive services. These counties include Broome, Cattaraugus, Cayuga, Chemung, Chenango, Dutchess, Franklin, Fulton, Oneida, Onondaga, Orange, Otsego, Tompkins, and Washington. These are examples of how a county-based system can effectively provide consistent, coordinated and integrated assessments and authorizations. Effective systems already in place should not be replaced by regional centers.

Counties also establish and maintain relationships with hospitals, law enforcement and emergency service providers, mental health programs, housing providers, physicians as well as many other community based organizations, to effectively interface with the full array of available long term home and community based supports.

Regional entities fundamentally do not have the same range of relationships with community entities that counties do. These relationships are critical to successful service plan development, particularly with high need individuals or those with cross-system service needs. Without a single, integrated service plan that can assess and put in place both Medicaid and non-Medicaid funded home and community-based services, the assessment process will be disjointed and more complex and thus be counter-productive for consumers, their families and the long term care system as a whole.

NY Connects: Meaningful Informed Choice

Long Term Care is a reality that many of us may face someday, and when confronting such a situation, consumers find it challenging to navigate the long term care system and evaluate the available choices for their own care or for a loved one. Consumers need help sorting through the complex myriad of long term care choices before them. New York State made a wise investment in establishing NY Connects three years ago. Consumers across the state have greater access to information needed to make the best choice possible for their situation. NY Connects is a response to consumers' need for unbiased information on long term care in their community. Offices for the Aging throughout the state have worked with the local Social Services Departments and their designees to provide consumers with information on choices for long term care options.

Principles for Restructuring Long Term Care

In restructuring long term care, NYSAAA concurs with the recommendations made by the CASA Association of New York State:

1. The goals and measurable expected outcomes of long term care need to be clearly defined for all Medicaid funded care.
2. The New York State Departments of Health, Aging, Mental Retardation and Developmental Disabilities and Mental Health oversee a myriad of community based programs. These agencies must align their vision, culture and philosophies.
3. Data on long term care needs to be collected, analyzed and widely disseminated and examined before making any changes to the current system.
4. Revise the NYS Personal Care Service Program regulations (NYCRR 505.14) to clarify the allowed Medicaid funded care a client can receive.
5. Provide substantive and ongoing training to those administering all Medicaid home care programs and to State Fair Hearing staff.
6. Provide substantive and consistent public education/orientation to households applying for in-home care on their rights and responsibilities in relation to the program's services.
7. Create the resources and tools needed at the local level for service provision, including the development of a standardized assessment tool.
8. Create a state service corps for aides working in either home care or in nursing homes to broaden the available pool of workers.

Improvement of the Current Assessment Process

Consistent, comprehensive, coordinated assessments, which can be integrated across systems, are needed in order for long term care restructuring strategies to work. NYSAAAA believes that local social services departments and their designees can better achieve the vision and outcomes established by the State if local social service district home care staff are provided with:

- initial and ongoing training
- a computerized assessment and reassessment database
- standardized forms

Such tools have historically been provided to local DSS Protective Services for Adults and Medicaid staff, but have not been similarly made available for the delivery of home care services. In the absence of such, the State will not be able to meet the outcomes or realize the cost-savings measures it seeks to achieve with the establishment of the LTC Assessment Centers as they also will lack the necessary tools and supports.

The New York State Department of Health should work with local social services departments to implement the tools and supports to improve the delivery of LTC services, without creating another layer and increasing fragmentation.