



# ***CMS: The Emerging Quality Framework***

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*CMS Interim Procedural Guidance*

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# *Revised Federal Quality Oversight*

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- Principles:
  - States are responsible for program quality and for assuring waiver participants' health and welfare
  - Federal oversight is a continuous process over the life of an approved waiver
  - The Federal oversight process requires continuous dialogue between CMS and the states
  - Focus = Quality Improvement



# *Revised Federal Oversight*

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- Process

- Federal oversight begins with CMS's review of the waiver application
- Requires information and regular updates from the states about their QA/QI activities
- Requires that CMS be clear about its expectations

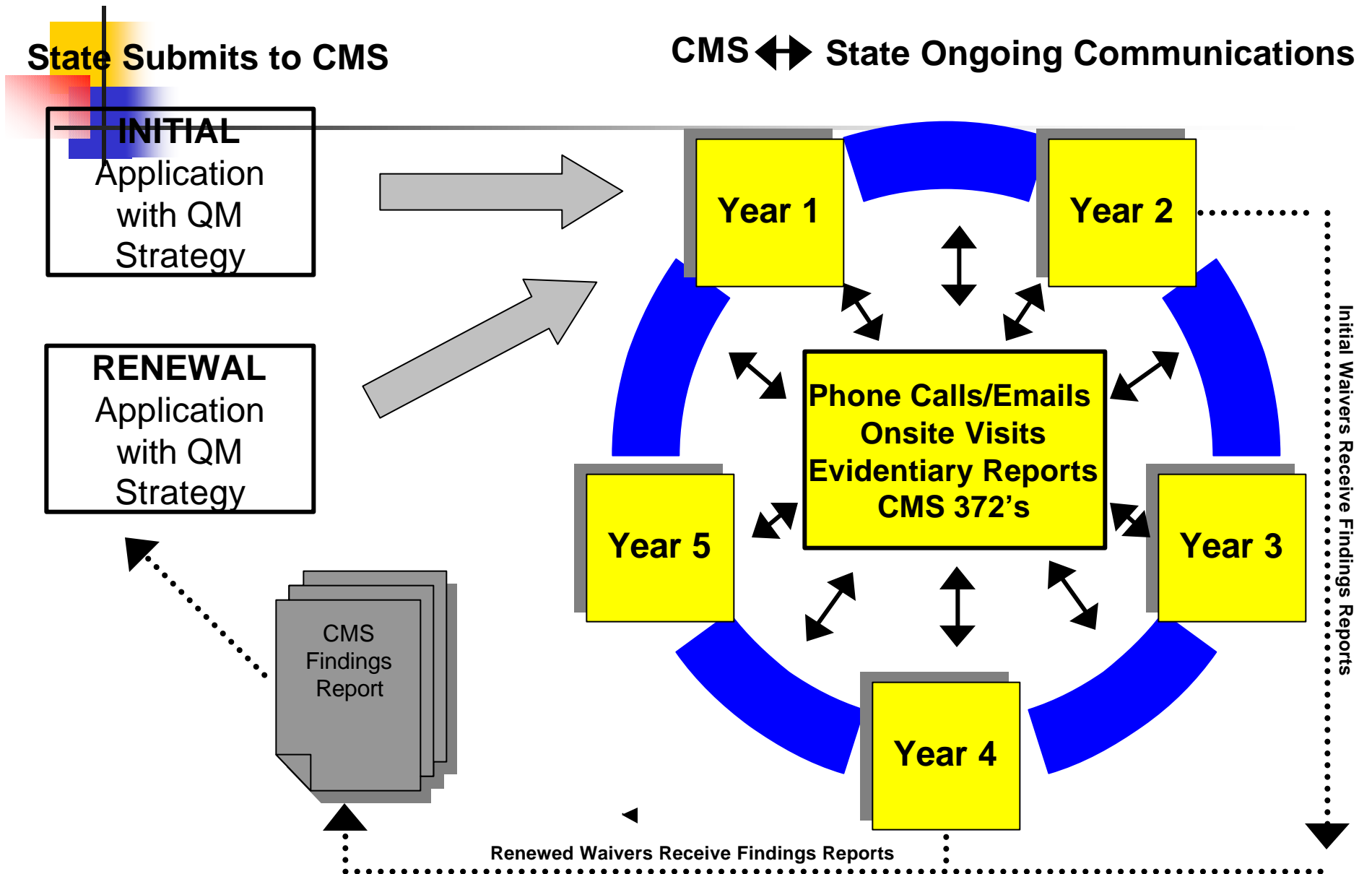


# *Revised Federal Oversight*

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- PAST: “audit” model based on on-site discussions, observations and case review
- FUTURE: quality management driven model with
  - Quality elements designed into program
  - State quality strategy to continually evaluate performance, identify & correct problems, and make systems improvement.
  - CMS reviews evidence that strategy is working

# The HCBS Waiver Quality Life Cycle





# *CMS Interim Procedural Guidance (IPG)*

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- Procedural guidance for CMS for conducting quality oversight of HCBS waivers
- Effective now, and until the completion of the revised waiver application & 372Q annual report
- Grounded in the states' *evidence* about their QA/QI activities and results
- State accountability; and developing systems to support continuous program monitoring



# IPG Process

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- Step 1: Issue the Standard Letter
  - **What:** Includes request for *evidence-based information*, taken from the state's own monitoring activities
  - **When:** No later than 18 months prior to waiver's expiration date



# IPG Process

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- Step 1: Issue the Standard Letter
  - What kind of *Evidence-based Information* does CMS need?
  - Focuses on the assurances
    - Level of Care
    - Plan of Care
    - Qualified Providers
    - Health and Welfare
    - Administrative Authority
    - Financial Accountability





## *IPG Process*

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- Step 2: State provides requested evidence
  - **What:** Enough evidence for CMS to make a determination that assurances are met.
  - **How:** State may request technical assistance in organizing its evidence from the National Technical Assistance Contractor (MedStat/HSRI/Muskie School)



# *IPG Process*

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- Step 3: CMS reviews state's evidence
  - Takes into account other information that CMS has about the state's QA/QI
    - CMS 372 Annual Reports
    - Program Complaint Logs
    - Media Coverage
    - Additional info submitted or communicated by state



## *IPG Process*

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- Step 4: CMS determines if state “substantially meets” the assurances
  - State has adequate/effective system for meeting assurances; and
  - Demonstrates ongoing, systematic oversight



## *IPG Process*

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- Step 4: CMS determines if state does *not* “substantially meet” the assurances
  - State demonstrates pervasive failure to meet an assurance; and
  - Has no internal plan of correction
  - In step 6, CMS must provide to State written recommendations for system improvements and timeline for completion



## *IPG: Steps*

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- Step 5: CMS issues draft report of findings to State
  - **What:** Conveys findings of the review, with summary of the state's evidence and CMS recommendations and timeline
  - **When:** Issued 12 months prior to waiver expiration
  - **Format:** Uses standard report template

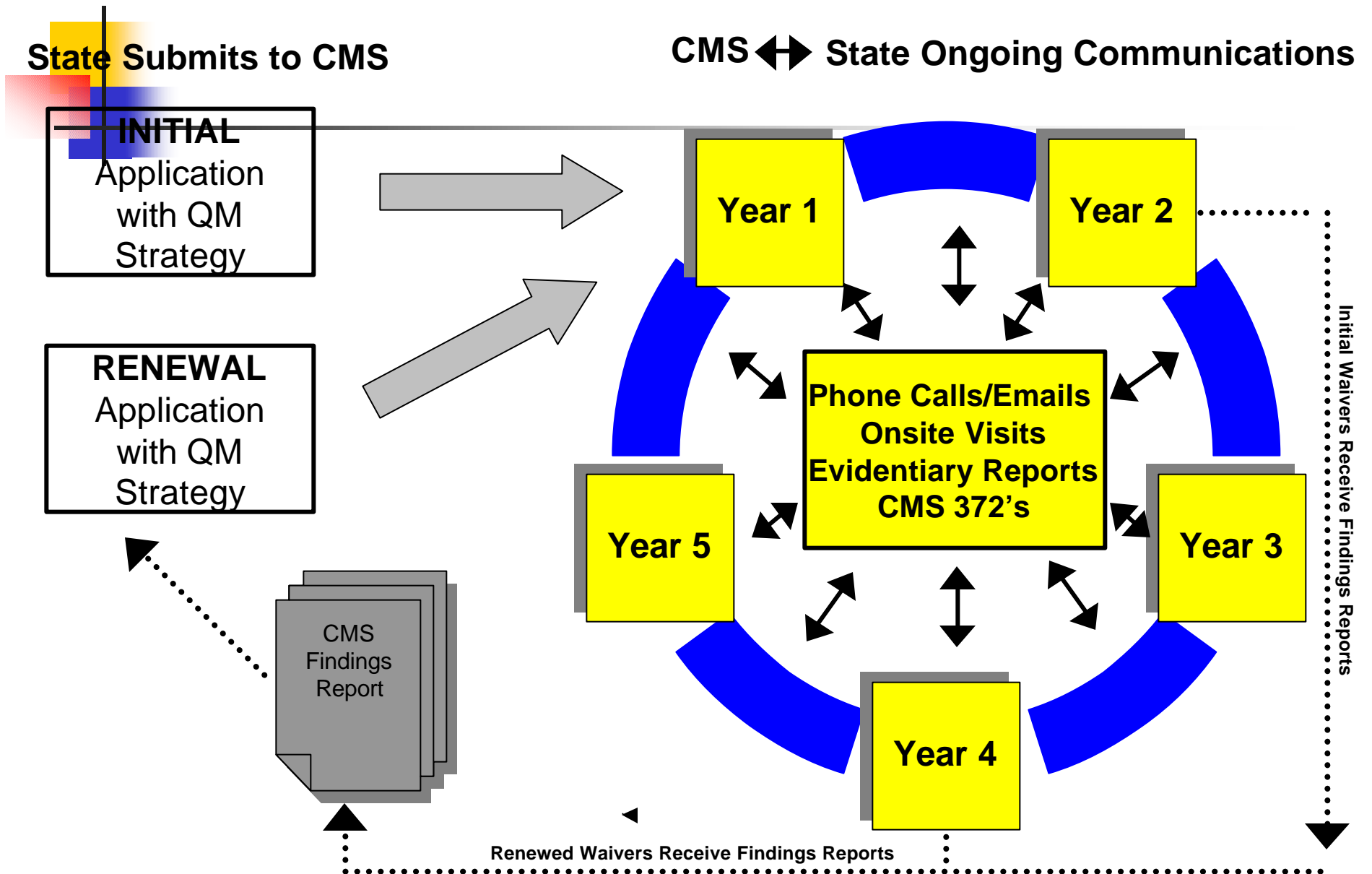


## *IPG: Steps*

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- Step 6: CMS issues Final Report to State
  - **What:** Incorporates CMS report and state's response
  - **When:** Issued within 60 days of receipt of state's response to draft
  - **To whom:** Sent to State Medicaid Agency and CMS CO
  - **Format:** Uses standard report template

# The HCBS Waiver Quality Life Cycle





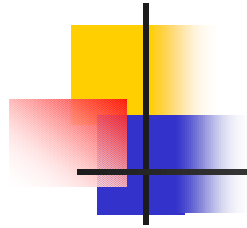
## *Contact Info*

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### National Technical Assistance Contractor

- Request assistance through your Regional Office waiver contact, or
- Contact MedStat directly through [beth.jackson@thomson.com](mailto:beth.jackson@thomson.com)





## *Contact Info*

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