



Response to Draft Medicaid Transformation Waiver Application 8/20/15

SEIU 775, as a leading advocate for long-term care workers and consumers, submits the following comments in response to the Transformation Waiver application draft released 7/23/15.

SEIU 775 is excited by the direction of the transformation application and sees great potential for the plan to better integrate and coordinate health, behavioral, and social services at the regional level, as well as provide more supports for aging individuals and their families. We back the state's effort to obtain an 1115 waiver from CMS and look forward to being an active partner in this endeavor.

We support the three transformation initiatives of Accountable Communities of Health (ACH)-led transformation projects, new long-term supports and services (LTSS) benefits, and new housing and employment services, however below we have identified some concerns and questions for your consideration.

Initiative 1

Transformation Projects

While the waiver addresses the needs of unpaid family caregivers, it does little to explicitly address or invest in the formal caregiving workforce. SEIU 775 agrees that family caregivers are a critical part of providing LTSS, however changing demographics mean that fewer family members will exist to meet the needs of aging loved ones. According to a recent study, by 2030 the supply of potential family caregivers will drop from seven potential caregivers for every senior to only four potential caregivers per senior.ⁱ Due to the aging of our population, coupled with the decrease in potential family caregivers, the University of Washington Center for Health Workforce Studies finds that Washington will need an additional 30,000 home care aides (a 56% increase) by the year 2030.ⁱⁱ We suggest that HCA insert language on page 27 in the Health Systems Capacity Building section stating, "Additionally, telemedicine programs which extend limited resources *and workforce development projects that increase the care skills of long-term services and supports individual providers* will be considered."

Additionally, SEIU 775 is concerned about the potential inadvertent exclusion or limiting of LTSS as an important part of ACH work. MCOs and BHOs, the drivers of ACHs, identification of community needs, and selection of regional transformation projects, have relatively little expertise in or coordination with LTSS systems. We ask that explicit language is inserted into transformation project RFPs to encourage ACHs to target LTSS in integration projects.



Initiative 2

MAC and TSOA Plans

SEIU 775 recognizes the benefits of offering additional supports to unpaid family caregivers and near Medicaid populations through the new proposed MAC and TSOA programs, however we have concerns about several aspects of Initiative 2.

With regards to the MAC program, more clarity is needed on both how individuals are presented the MAC and traditional LTSS programs and the enrollment process. Furthermore, it unclear how the “consumer directed budget” of the MAC program is defined. For both the MAC and TSOA plans, if consumers are able to hire individuals informally for personal care, respite, housework, and errand services and set their own wages, it brings up serious questions around worker protections and benefits such as worker’s compensation and health insurance. We would like to see clarity in the MAC and TSOA benefit charts on page 22 and 23 that the State does intend to use individual and agency providers to fulfill this work.

SEIU is also interested in whether the State has identified an entity that has the capacity and expertise to provide the caregiver training, support, and consultation benefits listed in the MAC and TSOA plans, and believes that the Training Partnership may be the ideal choice to provide such training.

Finally, SEIU 775 would like to see savings be reinvested in the system and asks that the next draft insert a fourth bullet on page 7 stating, “Anticipated savings from the MAC and TSOA programs will be reinvested in the LTSS system, specifically through capacity-building grants.”

Skilled Nursing Facility Eligibility

The waiver will increase the functional eligibility requirement for SNF services, but more info is needed as to what the new threshold is, how it will be determined, and how this will be de-linked from HCBS eligibility. In addition, what assurances are being provided that HCBS eligibility will remain the same in the future and not reduced to later meet the NFLOC threshold?

Public Awareness of Saving for Long-Term Care

If the State is seeking to help people avoid accessing Medicaid services, it should consider using demonstration funds to support a public awareness campaign to help families better understand and plan for long-term care expenses. This would result in more Washingtonians saving for long-term care needs and/or purchasing long-term care insurance plans, and help them avoid spending down to qualify for Medicaid.

Thank you for the opportunity to provide feedback on this draft application. We believe a Medicaid Transformation Waiver could greatly improve health care coordination and delivery in Washington. We look forward to working with you to incorporate our feedback into the plan.



For clarification or response, please contact:

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ⁱ Redfoot, D. (2013). *The Aging of the Baby Boom and the Growing Care Gap: A Look at Future Declines in the Availability of Family Caregivers* (No. 85). Washington, D.C.: AARP Public Policy Institute.

ⁱⁱ Skillman, S., & Basye, A. (2011). *Home Care Aides in Washington State: Current Supply and Future Demand*. Seattle, WA: Center for Health Workforce Studies. Retrieved from http://depts.washington.edu/uwrhrc/uploads/Home_Care_Aides_Brief.pdf