



Mass Home Care



December 12, 2016

Ms. Marylou Sudders, Secretary
Executive Office of Health and Human Services
One Ashburton Place, 11th Floor
Boston, Massachusetts 02108

Mr. Daniel Tsai, Assistant Secretary for MassHealth
Executive Office of Health and Human Services
One Ashburton Place, 5th Floor
Boston, Massachusetts 02108

RE: 9C Cuts to the Adult Foster Care Program

Dear Secretary Sudders & Assistant Secretary Tsai:

On behalf of the combined memberships of the Massachusetts Council for Adult Foster Care, Mass Home Care, the Association of Developmental Disabilities Providers, and the Arc of Massachusetts, we reach out to you with great concern about the recently announced 9C cuts to the Adult Foster Care (“AFC”) program, which is one of the state’s premier “community first” programs. While we appreciate that MassHealth has maintained open lines of communication with providers, the fact remains that these cuts are likely to destabilize a program that saves costs for MassHealth and the Commonwealth. Pursuant to this letter, we would like to request a meeting to further discuss alternatives to the 9C cuts to the AFC program as soon as possible.

As you know, the AFC program enables more than 10,000 elders and people with disabilities to continue to live in their communities with live-in caregivers. It is a program beloved by the participants and the wonderful caregivers who open their homes and hearts to others. AFC is one of the few 24/7 residential support programs that uses volunteer caregivers on a stipend, and keeps members living in the least restrictive setting, which is the mission of Mass Health.

If these individuals were not receiving at-home care through the AFC program, many thousands would find themselves living in an institutionalized setting. In fact, between the years 2000 and 2015, nursing facility patient days paid for by Mass Health have fallen by 37%, in part because of community-based alternatives like AFC. Aside from an individual’s personal preference to remain at home, be a part of a family and receive continuous care delivered by a single primary caregiver, AFC saves the Commonwealth millions of dollars each year.

A comparison of the AFC program with MassHealth nursing home payments is demonstrative:

Description	Nursing Home Care	Adult Foster Care
Number of MassHealth Members	~45,000	~10,000
MassHealth Payment per Member per Day	Average = \$125 - \$250	\$50 - \$85

The cost savings to be realized by the Commonwealth by avoiding institutionalization for MassHealth members is clear. It is wise, especially while MassHealth is working to ensure sustainability, for MassHealth to support programs and providers that can deliver care to a population with complex care needs at a substantially lower cost than alternative programs reimbursed by MassHealth.

The recently announced 9C cuts, which reduce funding for the AFC program by \$5.6 million (which is \$22.6 million annualized) will undermine the AFC provider agencies' ability to provide consistent and thorough support to the caregivers it oversees. The AFC program presents an innovative solution to person-directed care through the use of an unskilled workforce that is empowered to render care to individuals with complex health and behavioral needs through the support system and professional help available through the provider agency. Reducing the provider agencies' requirements to employ nurses and care managers to conduct home visits will withdraw support that these lay caregivers may need to ensure the safety and wellbeing of the individuals they care for.

This substantial and unprecedented 10% rate reduction is likely to:

- Undermine the ability of quality agencies to provide the level of clinical and social support that lay caregivers need to take on caregiving responsibilities for individuals with complex health and behavioral conditions.
- Negatively impact the ability of provider agencies to recruit individual caregivers willing to share their homes and the capacity of those agencies to train and provide quality assurance to individual caregivers.
- Erode the confidence of families to take on an around-the-clock commitment to caregiving at home and, thereby, encourage pursuit of less cost effective out of home alternatives.
- Place some provider programs into a fiscal deficit for the current year and going forward, having built programs, staffing, training and administration based upon the needs of the MassHealth members that they currently support and the Commonwealth's current regulatory requirements.

Our collective priority is to ensure that MassHealth members receiving services through the AFC program receive the highest quality of care and support and that it remains a sustainable option for individuals and families in the Commonwealth. We will be asking the General Court to restore funding to AFC, and we are asking MassHealth to reconsider the proposed cuts and instead raise the bar prior to credentialing new providers. Currently approved AFC providers are eager to continue to work with MassHealth to ensure that the program operates with integrity in a

manner that maximizes efficiencies. The substantial cut to the AFC program and elimination of important oversight activities currently required of AFC provider agencies can compromise quality and potentially place some MassHealth members at risk.

We look forward to meeting again to discuss this matter further.

Sincerely,



Gary H. Blumenthal
ADDP President & CEO



Linda Andrade, President
Mass Council for Adult Foster Care



Al Norman, Executive Director
Mass Home Care



Leo Sarkissian, Executive Director
The Arc of Massachusetts

Cc: Ms. Elizabeth Goodman, Director of MassHealth Long Term Services and Supports
Mr. Thomas Lane, Director of Fee-For-Service Programs
Ms. Allison Ananis, Adult Foster Care Program Manager