

## Massa, Cody

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**From:** Rachel M. Richards <[rrichards@seniorlink.com](mailto:rrichards@seniorlink.com)>  
**Sent:** Friday, June 3, 2022 4:57 PM  
**To:** [solicitation.questions](mailto:solicitation.questions)  
**Subject:** AHCA SMMC RFI Response  
**Attachments:** Seniorlink-AHCA SMMC RFI 6.3.2022.pdf

**Rachel M. Richards** | SVP, Government Programs & Government Relations



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June 3, 2022

Cody Massa  
Procurement Officer  
Agency for Health Care Administration

Delivered via email: [solicitation.questions@ahca.myflorida.com](mailto:solicitation.questions@ahca.myflorida.com)

RE: RFI 014-21/22 Re-Procurement of the Statewide Medicaid Managed Care Program

Dear Mr. Massa,

On behalf of Seniorlink, thank you for this opportunity to submit comments in response to the referenced Request for Information. Below please find our recommendations on the topic of **maximizing home and community-based placement and aging-in-place strategies**.

Seniorlink believes meaningful, consistent, and ongoing support of family caregivers is an essential aging-in-place strategy and foundational to extending and ensuring successful community tenure. Our belief is formed by our experience gained, over the past 20 years, working with States and managed care organizations to keep care at home by supporting family caregivers to meet the needs of their loved ones.<sup>i</sup> We coach caregivers to increase their knowledge, skills, and confidence about the care they provide and to decrease their caregiving burden. Seniorlink engages caregivers to improve outcomes for members, ensures caregivers attend to their own physical and mental health so they can continue in their caregiving roles for the long term, and enables Medicaid to achieve rebalancing goals<sup>ii</sup> and meaningful cost savings.<sup>iii</sup>

The AHCA currently requires SMMC managed care organizations to document, through the member assessment and care planning process, the identification of family caregivers who are integral to the member's care plan. **We recommend that AHCA expand upon this requirement to obligate SMMC health plans to conduct discrete and structured assessments of such caregivers to ensure that caregiver support needs are consistently identified and then addressed through the member's care planning process. Sustaining family caregivers in their roles has been proven to extend community tenure and improve outcomes for members.**

The only known challenges associated with the adoption of caregiver assessment activities by health plans is when the State does not sufficiently detail the assessment domains and data collection and data sharing requirements. We recommend that caregiver assessments include:

- Caregiver preparedness to manage the chronic conditions of the member they support
- Caregiver preparedness to manage medications safely and handle emergencies
- Caregiver stress and strain and self-care needs.

Evolving preferences for care at home, changes in health care practices, and direct care workforce shortages are pressing more and more family caregivers into roles for which most are unprepared. Comprehensive caregiver supports such as these were highlighted as an "opportunity for action" in an LTSS publication recently issued by the **National Association of Medicaid Directors**<sup>iv</sup> and align with recommendations of the **Administration on Community Living RAISE Family Caregiving Advisory Council**.<sup>v</sup> As the members of your team well know, without these caregivers, we can neither

sustain an effective home and community-based delivery system nor successfully implement the new waves of health care systems changes that will continue to bring more and more care into the home. **Recognizing family members for the critical role they play in our LTSS “workforce” is necessary to ensure the quality and continuity of care provided at home.**

I can be reached at [jcrosbie@seniorlink.com](mailto:jcrosbie@seniorlink.com) or 617-955-6430 if we may be of assistance in supporting AHCA to assess this recommendation. In the alternative, you may reach Rachel Richards, Seniorlink’s SVP of Government Programs & Government Relations at [r-richards@seniorlink.com](mailto:r-richards@seniorlink.com) or 617-945-6389.

Warm regards,

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<sup>i</sup> [Caregiver Services & Support: Elderly Care Solutions | Seniorlink](#) contracts with State Medicaid agencies and Medicaid Managed Care and PACE organizations to deliver supports across 10 States, to 12,000+ family caregivers who support more than 8,300 Medicaid members. We additionally contract with Medicare Advantage plans to deliver caregiver coaching supports. We engage with family caregivers who temporarily step away from careers in the traditional workforce to be full-time caregivers as well as those in part-time caregiving roles. The individuals in their care are of all ages and are living with chronic health conditions, complex physical and behavioral health conditions, and intellectual and developmental disabilities.

<sup>ii</sup> In November of 2020, the Centers for Medicare & Medicaid Services issued an LTSS Rebalancing Toolkit that identified a program that incorporates these elements - called Structured Family Caregiving - as a best practice. [Rebalancing Toolkit \(medicaid.gov\)](#); see page 18 for a general description of the program designed by the Georgia Department of Community Health for family caregivers of members served through their Medicaid Elderly and Disabled Waiver Program. Seniorlink is an approved provider of this service in Georgia and a contracted provider and vendor of like programs to States, health plans, and PACE organizations, as noted above.

<sup>iii</sup> <https://info.seniorlink.com/improving-outcomes-complex-whitepaper>

<sup>iv</sup> [Medicaid-Forward-LTSS-09-27-21.pdf \(medicaiddirectors.org\)](#)

<sup>v</sup> [RAISE Family Caregivers Act Initial Report to Congress \(acl.gov\)](#)