



The Rate Review Process and Consumer Directed Attendant Support Services

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Because Consumer Directed Attendant Support Services (CDASS) is a service delivery model, rather than a rate, the Department plans to conduct a modified rate review analysis. This document explains why the Department must use a modified analysis. For more information about the rate review process, see the [Frequently Asked Questions document](#) on the Department’s [Medicaid Provider Rate Review Advisory Committee \(MPRRAC\) website](#).

CDASS is a delivery model that allows client flexibility in using certain HCBS Waiver services: personal care, homemaker, and health maintenance services. Through CDASS, clients have the flexibility to:

- Hire attendants;
- Determine attendant wages;
- Determine attendant schedules; and
- Coordinate the amount of personal care, homemaker, and health maintenance services to best meet their individual needs.

In some situations, clients on qualifying HCBS Waivers may instead access personal care, homemaker, and health maintenance services through an agency. Note: in FY 2015-16 the Joint Budget Committee (JBC) appropriated additional funding for agency-based homemaker and personal care services, but did not appropriate additional funding for CDASS.

The payment methodology and available data for these services differs based on whether services are accessed through an agency or CDASS. Differences are illustrated in the example below.

Example: A client’s service plan indicates a client needs 10 units of homemaker services and 20 units of personal care services.

Agency: After approval of the client’s prior authorization request (PAR), an agency would arrange for attendants to provide services for the client. The agency would then submit a claim to the Department for the services that were provided. The Department would have access to the following information:

Service	Authorized Units	Utilized Units	Unit Rate	Payment to Agency
Homemaker	10	10	\$4.25/15 min	10 x \$4.25 = \$42.50
Personal Care	20	20	\$4.25/15 min	20 x \$4.25 = \$85.00
TOTAL	30	30		\$127.50



If the client's needs were to change and, for example, the client now needed 5 units of homemaker services and 25 units of personal care services, the client would work with their case manager to submit an updated PAR. The client would not be able to utilize additional units, or modify services received, until the PAR has been revised.

CDASS: After approval of the client's PAR, a set dollar amount would be allocated to the client (based on the need for 10 units of homemaker services and 20 units of personal care services). The client could then contact an attendant and schedule services.

Service	Authorized Units	Utilized Units	Unit Rate	Payment to Attendant
Homemaker	10	5	\$3.86/15 min	5 x \$3.86 = \$19.30
Personal Care	20	25	\$3.86/15 min	25 x \$3.86 = \$96.50
TOTAL	30	30		\$115.80 (Total Allocation)

CDASS clients can substitute services to respond to changing needs in so far as their allocation amount is not exceeded. If the client's needs were to change and, for example, the client now needed 25 units of personal care services, the client would have the flexibility to schedule attendants for additional hours of personal care and reduce their use of homemaker services to 5 units.

Because CDASS clients have this flexibility to substitute services to respond to changing needs and are not required to follow the service type authorized, the Department lacks access to utilized units by service. Instead, the Department has access to the overall total payment to all attendants. Additionally, if the client chose to pay the attendant a higher wage than the unit rate used in the allocation formula, the client could receive fewer hours of service, and the Department would not have access to this information.

Without utilization and service-specific provider payment information, the Department cannot conduct the normal rate comparison and access analysis. Instead, the Department will attempt to compare unit rates (e.g., \$3.86/15 min, as seen above) to published rates from other State Medicaid agencies, where services are similar. The Department also plans to work with Financial Management Service (FMS) vendors to determine if additional utilization data can be used in a modified analysis. The modified rate review analysis of CDASS will appear in the 2017 Analysis Report, published May 1st and available on the Department's MPRRAC website.

