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CA Association for Adult Day Services
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To: Department of Health Care Services (DHCS)
From: California Association for Adult Day Services (CAADS)
Re: California's Home and Community-Based Services Spending Plan

The California Association for Adult Day Services (CAADS) would like to thank the Department of Health Care Services and our other state partners for these historical investments in the Home and Community-Based Services Spending Plan. We believe the proposed plan provides valuable and necessary resources to not only build upon the state's recovery from the COVID-19 pandemic, but also undergo long-term transformation to improve equity and empower Californians. For this common goal, CAADS would like to provide comments on how adult day services (Adult Day Health Care/Community Based Adult Day Services (CBAS) and Adult Day Programs (ADPs)) can play a crucial role in the implementation of this spending plan, as well as other ways in which the enhanced FMAP can be utilized to benefit the vulnerable populations that adult day services centers throughout the state serve.

Throughout the COVID-19 crisis, both CBAS and ADP centers have stepped up to provide essential services and interventions to adults with complex medical, cognitive, and mental health needs, as well as supporting their family caregivers. As the state moves into the next phase of emergency recovery to build back stronger, the funding made available through Section 9817 of the American Rescue Plan Act of 2021 can empower centers to not only continue to provide these vital services, but also enhance and strengthen access to care in safe community-based settings.

Under **Non-IHSS HCBS Care Economy Payments**, we would appreciate further clarification on how CBAS and ADP centers can partner with DHCS for the deployment of these payments. Moreover, additional detail is needed to understand how the Department will know who was employed during the specified period of time. Additionally, because of the uncertainty surrounding safety protocols as well as initial stay-at-home orders during the first few months of the pandemic, many staff were furloughed; the question therefore remains if these furloughed staff will be entitled to these payments and if these payments will be similar to the hospital and nursing facility payments that have already been distributed. Similarly, further clarification regarding the implementation of **Direct Care Workforce (non-IHSS) Training and Stipends** and how CBAS/ADP staff can take part would be appreciated.

The **Community Based Residential Continuum Pilots for Vulnerable, Aging, and Disabled Populations** presents an opportunity for CBAS and ADP centers to partner with DHCS and DSS to further develop and implement this program successfully. Because many of the participants served in CBAS and ADP centers have the risk factors targeted in this pilot project, and centers have extensive experience in providing services to participants to avoid unnecessary healthcare costs (including emergency services and future long-term care placement in a nursing home), ongoing collaboration will be beneficial. As such, CAADS stands ready to assist.

Regarding **Medicare Partnership and Shared Savings on Supplemental HCBS Benefit Services**, CAADS asks to be a partner in the development of this new service delivery model for dually eligible individuals. Adult day services centers have long served dually eligible individuals who are at risk for inpatient or nursing home stays. Thus, utilizing the expertise and experiences of centers can provide valuable insights for the implementation of this benefit.

Previously Submitted Proposal for One-Time Facility COVID-19 Mitigation Grants

We additionally would like to respectfully ask for the inclusion of a new one (1) time mitigation grant of \$30M Total (\$15M EFF and \$15M other funds) to enable CBAS and ADP centers continue to adapt to the challenges of safely returning to congregate community care within the constraints of public health orders for distancing, masking and so on. This mitigation funding would be aligned with Section 9817 of the ARP Activities to Support

State COVID-Related HCBS Needs as HCBS Provider Payment Rate and Benefit Enhancements as **Specialized Payments** to “[p]rovide adult day centers with funding to make physical, operational, or other changes to safely deliver services during the COVID-19 PHE” (*see* SMD# 21-003, pg. 19).

The COVID-19 pandemic has painfully made clear the negative impact of isolation within this vulnerable population, thereby necessitating the need to move forward into this next stage of recovery. There is an urgent need to improve the health and safety environment for the vulnerable populations served in CBAS and Senior Care Adult Day Program consistent with CDC guidelines in order to enable to serve participants in congregate settings and respond to and reduce the negative effects of long-term isolation at home. Much like the **Nursing Home Recovery & Innovation** funding made available through the spending plan, CBAS and ADP have gained critical lessons during the pandemic and must accordingly accelerate innovations.

CAADS therefore asks that DHCS and the state consider using the enhanced FMAP and other budgetary surplus as one-time funds for providers to prepare facilities, participants, and staff for safe resumption of congregate services. We propose the allocation of grants amounts ranging from \$10,000 to \$200,000 to any qualified facility, regardless of tax status (e.g., for-profit and non-profit). These grants can be managed and overseen by the California Department of Aging, as the lead for administration of these grants.

This request of \$30,000,000 would be used as one-time grant funding to:

- Prepare facilities for the safe return of participants to congregate CBAS and Adult Day programs
- Improve participant access to telehealth services
- Support workforce onboarding and training
- Include administrative costs at the Department to oversee the project

Thank you for your leadership and consideration of our comments. We stand ready to assist in any way.

Sincerely,



Kawon (Kay) Lee, MPH
Chair, Legislative/Policy Committee
California Association for Adult Day Services