

## **PCS Desk Review Summary**

In an effort to ensure the reliability of the Independent Assessment process and to be reactive to provider feedback, the Division of Medical Assistance (DMA) has been working with Liberty Healthcare, Independent Assessment Entity for PCS, to assure the integrity of the assessment process. In the Spring of 2015, DMA provided guidance to Liberty Health Care to address adherence to PCS policy in the conduction of assessments. Training was provided to all assessors and in November of 2015, Liberty began conducting assessments in accordance with the re-clarified guidance provided by DMA. Since December of 2015, DMA has evaluated the impact of the clarified guidance, and provided retraining to Liberty assessors when it was discovered a potential over-correction was made regarding assessment performance.

During the month of July, DMA instructed Liberty Healthcare to delay upcoming annual reassessments and reschedule them in August, utilizing July to work with Liberty to continue reviewing assessment data. DMA directed Liberty to conduct desk review audits on May 2016 adverse annual reassessments for beneficiaries who did not file an appeal. May assessments were conducted in accordance with re-clarified guidance and Liberty assessors were re-trained in accordance with the guidance effective April 2016.

In the interim, Liberty Healthcare continues to perform 100% assessment review on all new employees for a minimum of 60 days or until the assessor reaches 95% compliance and 10% of all other assessments completed for each assessor. Additionally, DMA PCS staff have shadowed Liberty's assessors to monitor the assessment process, conducted customer satisfaction surveys, and completed desk reviews on 10% of adverse decisions from November 2015 – March 2016 on beneficiaries who did not file an appeal. The internal desk review revealed that all adverse decisions were appropriately issued based on the revised guidance and re-training provided to Liberty in accordance with policy.

### **Desk Review Methodology**

A sample of 827 annual reassessments conducted during the Month of May 2016 for beneficiaries who did not file an appeal was used to conduct the desk review audit. 541 desk reviews were completed by Liberty on the sample set identified. The results of the desk review, confirmed that Liberty Healthcare has appropriately adjusted their performance of assessments in accordance with PCS Policy and guidance. Desk reviews conducted compared the 2016 assessment to 2015 assessment conducted for each beneficiary identifying if the adverse decision was due to one or more of the following categories:

- Change in Beneficiary Condition/Caregiver availability;
- Compliance with Policy Guidance; and/or
- Quality Assurance Review

### **Findings**

The desk review showed that the adverse decisions for the identified beneficiaries were due to the following:

- 83% of the 541 were due to compliance with policy guidance,

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- 52% of the 541 were due to a change in the beneficiary's condition/caregiver availability, and
- 6% of the 541 were due to a quality assurance review.
- 39% of the 541 of reviews identified more than one reason for the reduction.

The 6% adverse decisions identified in the quality assurance review accounted for a total of 34 assessments. The quality assurance review identified discrepancies with the overall capacity scoring, frequency, exacerbating conditions, and overall inconsistencies. It is important to note that at least 25 known assessment quality assurance reviews for 2015 assessments resulted in an inflation of hours for beneficiaries, which resulted in a reduction in 2016 with no errors.

### **Conclusion**

Based on review of the aforementioned information, DMA instructed Liberty Healthcare to resume the performance of annual reassessments in August. DMA is confident in the performance and integrity of the assessment process as conducted by the Independent Assessment Entity, Liberty Healthcare of NC. Beneficiaries who were due for their assessment in July have been rescheduled. Beneficiaries, legally responsible parties, and providers who have questions regarding assessments should contact Liberty Healthcare at 919-322-5944 or 1-855-740-1400. DMA will continue to work closely with Liberty Healthcare to monitor the PCS program to ensure the accuracy of the independent assessment process for individuals seeking state plan Personal Care Services.