

To: Department of Human Service, Office of Long-Term Living
Bureau of Policy and Regulatory Management

From: Dirk Matson, Ph.D.
Administrator III
Westmoreland County Area Agency on Aging (AAA)

Re: MLTSS Public Comment

The Westmoreland County Area Agency on Aging would like to offer the following comments on the proposed Managed Long Term Services and Supports (MLTSS).

- We support many of the objectives and values of the MLTSS initiative, such as enhancing opportunities for community based services, person-centered service design, provider access, participant education and enrollment support, preventative services, and a focus on quality and outcomes
- We are concerned about the lack of specifics in a plan for how MLTSS will operate
- Representative consumer advocates, AAAs, P4A and the current <60 providers need to be at the table for a 'plan' discussion. Any plans should be vetted with these same entities prior to plan implementation and then should be open for comments from the communities at large.
- What voice will consumers be given not only in the care they will receive through a managed care system but in how this system will be implemented? How will consumers be affected by this initiative? Will someone in an office far from the community be best suited for making decisions for consumers? Will consumers be limited to a "one size fits all" approach to treatment?
- We are concerned about the short time line, particularly for Western Pennsylvania. The initiative is to begin January 1, 2017. There is a great deal of work and education that needs to happen between now and then.
- A local western region work group needs to be developed, comprised of the MCOs and AAAs. This group's main goal should be to process the 'roll out' within this western region. This group's mission would be separate from the advisory group suggested below, whose main goal is operations once the process is established.
- There is no mention of the role of AAA in the informational document. This is conspicuous, particularly considering AAAs are the organizations that deal with consumer issues on a daily basis. There are many concerns about this. One is that MLTSS may be a management system from a distance, not paying attention to consumer needs at a local level. Who knows better what consumers' needs are than professionals who live in their communities, except the consumers themselves?
- There should be an advisory committee established to offer feedback and advice for operations, once established. This advisory committee should include at least 51% consumer and caregiver representation. Half of the consumers on the advisory committee should represent elderly consumers over age 60

- The role AAAs can take is to conduct assessments and Options counseling for all consumers and perform care coordination for over-60 aged consumers, contingent upon the AAAs working to ensure there will be adequate firewalls to eliminate any real or perceived conflicts of interest. AAAs are already familiar with the existing resources within each county service area and would be able to easily coordinate care/service
- After implementation, AAAs may be able to offer additional services to individual plans

If you have any questions, please feel free to contact me at your earliest convenience. My phone number is (724)830-4451. My email address is dmatson@co.westmoreland.pa.us.