

## Access Rule's Quality Requirements

The following section provides a summary of the Access Rule requirements and a side-by-side correlation to Cadence, Tempo's technology solution.

This Access Rule summary is not presented as a legal analysis of the proposed regulation and should not be relied upon as a legal document. The analysis is presented to provide an operational review of the Access Rule and compare the requirements to the technology solution.

| PERSON-CENTERED PLANNING  |   |
|---|---|
| Access Rule Requirement   | Cadence   |
| <ul style="list-style-type: none"><li>• Person-centered plans must be updated every 12 months, as an individual's needs change, or at the request of an individual.</li><li>• Individuals must have a reassessment of functional needs survey completed annually for at least 90% of individuals. Their person-centered plan must be updated per the assessment.</li><li>• States must report on their compliance with the person-centered plan requirements annually.</li><li>• States to report annually on the percent of beneficiaries continuously enrolled in the State's HCBS programs for 365 days or longer for whom a reassessment of functional need was completed within the past 12 months.</li><li>• States would also be required to report on the percent of beneficiaries continuously enrolled in the state's HCBS programs for 365 days or longer who had a service plan updated as a result of a reassessment of functional need within the past 12 months.</li></ul> | <p>Cadence has a person-centered plan module that guides case managers in developing an Access Rule compliant person-centered plan. The process includes:</p> <ul style="list-style-type: none"><li>→ Ability to provide annual functional reassessment surveys.</li><li>→ Standard service evaluation questionnaires, with the ability to customize questions.</li><li>→ Ability to create custom surveys to solicit additional information.</li><li>→ Review and approval privileges for case managers for goals entered by individuals. Approved goals populate the person-centered plan.</li><li>→ Ability to assign services to goals.</li><li>→ Ability to sign and store person-centered plan.</li><li>→ Provides copies of person-centered plan to individuals via their Tempo account.</li></ul> |

## GRIEVANCES

### Access PRM Requirement

- Grievances must be resolved within 90 days of receipt, expedited grievances must be resolved within 14 days.
- States grievance policies and procedures must:
  - Have written policies and procedures for their process that comply with Access Rule.
  - Assist beneficiaries in completing grievance forms and following procedures.
  - Prohibit retaliation.
  - Accept grievances, requests for expedited resolution of grievances, and requests for extensions of timeframes from beneficiary.
  - Provide notices and information related to procedures for completing grievance filing and individuals' rights. Needs to be accessible to those with limited English.
  - Review grievance resolutions with which beneficiaries are dissatisfied.
  - Make grievance information available.
- Grievance systems should:
  - Allow grievances to be filed orally or in writing.
  - Acknowledge receipt of each grievance.
  - Ensure grievances are administered by unrelated personnel.
  - Provide beneficiaries the opportunity to respond face to face or in writing.
- Provide beneficiaries with free translation services.

### Cadence

Cadence makes it easy to initiate, track, manage, resolve and store grievances.

Cadence's grievance module for individuals and their authorized representatives contains the following:

- Provides a guided process that allows the individual to electronically file a claim. Other methods of filing are available.
- Allows users to expedite their grievance or request more time.
- Access written policies and procedures for filing grievances, and notices of their rights.

Cadence makes it easy to track and respond to grievances.

- Cadence's grievance response process assists case managers in responding to complaints in a systematic and standardized way.
- Track deadlines for responses and sends notifications.
- Report on grievances, response times, and other metrics available.

## HCBS QUALITY MEASURE SET

### Access Rule Requirement

CMS has identified 61 measures in the HCBS Quality Measure Set. All states will be required to measure individual service experience using a combination of these measures.

- CMS will:
  - Inform states how to collect and calculate data.
  - Provide standardized reporting requirements and procedures.
  - Identify specific populations that require stratified reporting.
  - Establish target metrics for each measure.
  - CMS will review and update measures as appropriate.
- Reporting needs to be provided biannually.
- Users will be able to stratify data according to their own preferences and needs.
- States must establish performance targets for each of the mandatory measures in the HCBS Quality Measure Set and describe the quality improvement strategies that they will pursue to achieve the performance targets for those measures.

### Cadence

Cadence comes with 100% of the non-medical HCBS Quality Measure Set available for use. States will determine which measures will be implemented into their version of Cadence. Medical-related measures can be brought in through data system integrations with Medicaid or other identified databases.

Cadence collects data and populates the measures and reports in real-time, as individuals complete the surveys contained in our person-centered plan module, provide evaluations and use the system.

Because Cadence is also a data repository, users can stratify measurement data according to their own needs or preferences (for example, by race, ethnicity, Tribal status, sex, age, rural/urban status, disability, language, etc.)

## CRITICAL INCIDENT REPORTING SYSTEM

| Access Rule Requirement   | Cadence   |
|---|---|
| <ul style="list-style-type: none"> <li>• States must maintain an incident management system that identifies, tracks, and reports on critical incidents.</li> <li>• States must investigate critical incidents following procedures and within specific timeframes.</li> <li>• States must report on the results of their investigations.</li> </ul> | <ul style="list-style-type: none"> <li>• Cadence comes with a complete critical incident module that identifies, tracks, guides and reports on investigations.</li> <li>• Cadence’s module is customized to states’ procedures and deadlines, guiding investigators every step of the way.</li> <li>• Cadence reports on all required Access Rule information, including number and timing for initiated and resolved incidents.</li> </ul> |

## STANDARDIZATION OF HCBS REPORTING REQUIREMENTS AND TRANSPARENCY

| Access Rule Requirement  | Cadence   |
|--|---|
| <ul style="list-style-type: none"> <li>• States must operate a website that meets accessibility requirements and provides results of reporting on:               <ul style="list-style-type: none"> <li>→ Incident management</li> <li>→ Critical incident</li> <li>→ Person-centered planning</li> <li>→ Service provision and compliance data</li> <li>→ Data on HCBS Quality Measure set</li> <li>→ Access data</li> <li>→ Payment Adequacy data</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>• Tempo can operate a website on behalf of each state, posting required reporting in a format that is easy to view and use:</li> </ul> |