

PACE AUDIT PROCESS

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PACE Regulations

- Code of Federal Regulations
- Title 42: Public Health
- *PART 460—PROGRAMS OF ALL-INCLUSIVE CARE FOR THE ELDERLY (PACE)*

PART D Regulations

- Code of Federal Regulations
- Title 42: Public Health
- *PART 423—Voluntary Medicare Prescription Drug Benefit*

PACE Regulations

- **PACE organization**
- **PACE program**
- **§460.4 Scope and purpose.**

PACE Regulations

- **§460.12 Application requirements**
- **§460.18 CMS evaluation of applications**
- **§460.30 Program agreement requirement**
- **§460.32 Content and terms of PACE program agreement**

PACE Regulations

- **§460.190 Monitoring during trial period**
- **§460.192 Ongoing monitoring after trial period**
- **§460.194 Corrective action**
- **§460.196 Disclosure of review results**

Audit Procedure

Purpose:

- To confirm the PACE organization's compliance with federal requirements at 42 CFR §460

Technical Advisory Visits

- Visit to the newly operational PACE organization
- Does not take the place of the first trial period audit

Types of Audits

- **Trial Period Audits**
- **Routine Audits**
- **Focused Audits**

Trial Period Audit

- review
- Ensures compliance with the PACE requirements
- Observations, documentation review, and interviews

Routine Audit

- Onsite comprehensive review
- Conducted at least every two years
- After successful completion of the trial period

Focused Audit

- Focus on specific areas where problems are thought to lead to non-compliance with regulations

PACE Elements

Three areas audited:

- **Operational Elements**
- **Clinical Elements**
- **Part D Elements**

PACE Audit Team

- **Centers for Medicare & Medicaid Services**
- **State Administering Agency**

Prior To The Audit

- Notification letter and request for pre-audit documentation
- Pre-audit telephone calls to PO
- Select staff and participant records for review

On-site Audit Tasks

- Entrance Conference
- Tour of the PACE Organization
- Observations
- Documentation Review
- Interviews
- Daily Debriefing
- Exit Conference

Conclusion of the Audit

An element can be:

- **Met**
- **Met with Note**
- **Not Met**

Regulatory Compliance

**How to achieve and/or maintain
regulatory compliance?**

Steps to Take

- Review each element.
- Are systems in place to meet each requirement?

Steps to Take

- **Observe.**
- **Review Documentation.**
- **Interview participants, caregivers, and staff.**

CONTRACTED SERVICES

- **§460.70**
- **A written contract with each outside organization**
- **A contractor must be accessible to participants**
- **Designate an official liaison**

Fiscal Soundness

- **\$460.80**
- **Fiscally sound operation**
- **Insolvency plan**

Explanations of Rights

- **§460.116**
- **Participants understand their rights**
- **Written in English and in any other principal languages**
- **Displayed in a prominent place**

Grievance Process

- §460.120
- A complaint, either written or oral, expressing dissatisfaction with services delivery or the quality of care furnished

Appeals Process

- §460.122
- A participant's action taken with respect to the PACE organization's

a service including denials,
reductions, or termination of
services

Additional Appeal Rights

- §460.124
- Informed of appeal rights under Medicare or Medicaid managed care, or both
- Assist the participant in choosing which to pursue
- Forward the appeal

Enrollment Process

- **§460.152**
- **Intake Process**
- **Assess the participant's level of care**
- **Process for the denial of enrollment**

Voluntary Disenrollment

- **§460.162**
- **A PACE participant may voluntarily disenroll from the program without cause at any time.**

Involuntary Disenrollment

- § 460.164
- Fails to pay
- Engages in disruptive or threatening behavior
- Moves out of the services area
- No longer meets the level of care

Training

- **\$460.66**
- **Provide training to all staff**
- **Competency before performing independently**

Oversight of Direct Participant Care

- **§460.71**
- **Orientation**
- **Competency program completion and evaluation**
- **Contract Liaison**

Oversight of Direct Participant Care

- Requirements for persons with criminal convictions
- Have current certifications
- Free of communicable disease and up to date with immunizations
- Abide by the PACE philosophy

Physical Environment

- §460.72
- A safe, sanitary, functional, accessible, and comfortable environment
- Designed, constructed, equipped, and maintained for the physical safety of participants, personnel, and visitors

Physical Environment

- Sufficient space and equipment to provide care and services
- Fire Safety
- Emergency and Disaster Plan

Infection Control

- **§460.74**
- **Follow accepted infection control polices and standard procedures**
- **Infection Control Plan**

Transportation Services

- **\$460.76**
- **Safe, accessible, and equipped to meet participants' needs**
- **Maintenance of vehicles**
- **Communication with PACE center**
- **Training of transportation staff**

Dietary Services

- **\$460.78**
- **Nourishing, palatable, well balanced meals**
- **Provide substitute foods**
- **Approved food sources**
- **Sanitary conditions**

Service Delivery

- **\$460.98**
- **Meet the needs of each participant in all care settings 24 hours a day, every day of the year**
- **Comprehensive medical health and social services that integrate acute and long-term care**

Emergency Care

- **§460.100**
- **Establish and maintain a written plan to handle emergency care**
- **Emergency services include inpatient and outpatient services**
- **On-call provider, available 24-hours per day**

Interdisciplinary Team

- §460.102
- **Comprehensively assess and meet the individual needs of each participant**
- **Responsible for the initial assessment, period reassessments, plan of care, and coordination of 24 hour care delivery**

Participant Assessment

- §460.104
- Initial comprehensive assessment
- Semiannual reassessment
- Annual reassessment

Plan of Care

• §460.106

- Develop a comprehensive plan of care to meet the participant's needs
- Identify measurable outcomes to be achieved
- Evaluate the plan of care

Quality Assessment and Performance Improvement Activities

- §460.136
- Identify areas of good or problematic performance
- Take actions to maintain or improve care
- Designate an individual

Medical Records

- **§460.210**
- **A single, comprehensive medical record for each participant**
- **Be complete, accurately documented, and readily accessible**

Summation

- **PACE organizations agree to meet the PACE requirements**
- **The audit process confirms compliance with the regulations**
- **Assess, Plan, Implement, Evaluate and Document**

Questions

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