Functional Assessment, Interoperability, and Quality Measurement: FASI Paves the Way

HCBS Conference Virtual Session
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Disclaimer

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Learning Objectives

1. Learn how states are building their HCBS delivery system in support of interoperability and quality.

2. Discover new CMS updates about interoperability and care coordination using the CMS Data Element Library (DEL) and Post-Acute Care Interoperability Project (PACIO) use cases.

3. Learn about the two FASI performance measures.
Introduction to FASI
Trudy Mallinson, George Washington University
What is FASI?

Identifies personal priorities for functioning

Assesses for functional status and need for assistance in daily activities

Person-centered, standardized item set
FASI Populations

Adapted from FASI Final Report
<table>
<thead>
<tr>
<th>Data Element Code</th>
<th>Domain</th>
</tr>
</thead>
<tbody>
<tr>
<td>GG0130</td>
<td>Self-Care (e.g., Eating, Bathing, Dressing)</td>
</tr>
<tr>
<td>GG0170-0175</td>
<td>Mobility (e.g., Positioning, Transfers, Ambulation, Wheeling)</td>
</tr>
<tr>
<td>GG0185</td>
<td>Instrumental Activities of Daily Living (IADLs) (e.g., Meal Preparation, Shopping)</td>
</tr>
<tr>
<td>GG0125</td>
<td>Assistive Devices for Everyday Activities</td>
</tr>
<tr>
<td>F0900-0920</td>
<td>Living Arrangements, Availability of Assistance, Availability of Paid and Unpaid Assistance</td>
</tr>
<tr>
<td>GG0135, GG0180, GG0190, FO910, F0925</td>
<td>Personal Priorities</td>
</tr>
</tbody>
</table>
FASI Rating Scale

- FASI includes a standardized rating scale across all Self-Care, Mobility, and IADL Domains.
- Scale options range from Independent to Dependent and are similar to rating scales used across functional assessments used by most states.
- Responses are based upon Usual and Most Dependent performance.

<table>
<thead>
<tr>
<th>Performance Level (Enter Codes in Boxes)</th>
</tr>
</thead>
<tbody>
<tr>
<td>7. Usual</td>
</tr>
<tr>
<td>8. Most Dependent</td>
</tr>
</tbody>
</table>

Coding Safety and Quality of Performance:

06. **Independent** - Person completes the activity by him/herself with no assistance from a helper.
05. **Setup or cleanup assistance** - Helper sets up or cleans up; person completes activity. Helper assists only prior to or following the activity.
04. **Supervision or touching assistance** - Helper provides verbal cues and/or touching/steadying and/or contact guard assistance as person completes activity. Assistance may be provided throughout the activity or intermittently.
03. **Partial/mild assistance** - Helper does LESS THAN HALF the effort. Helper lifts, holds, or supports trunk or limbs, but provides less than half the effort.
02. **Substantial/maximal assistance** - Helper does MORE THAN HALF the effort. Helper lifts or holds trunk or limbs and provides more than half the effort.
01. **Dependent** - Helper does ALL of the effort. Person does none of the effort to complete the activity. Or, the assistance of 2 or more helpers is required for the person to complete the activity.
Personal Priorities

- Open-ended response opportunity at the end of a section for individuals to list their top two priorities for the next 6 months
- Asked at the end of:
  - Self-Care
  - Mobility
  - IADL
  - Living Arrangements
  - Paid and Unpaid Assistance

**GG0135. Self-Care Priorities:**
Please ask the person to describe at least one or two personal priorities in the area of self-care for the next six months. If the person does not express any personal priorities in this area, please note this below.

A. I want to eat with a fork, without assistance after food is put on the table.

B. I want to be able to go to the bathroom without help.
Value of Using FASI
Heather Johnson, The Lewin Group
Selection of FASI: Key Considerations

- Reliability and Validity
- Federal and State Legislative Directives
- Standardization
- Health IT Initiatives
- Person Centeredness
- Quality Measurement
- Interoperability
How Can States and Managed Care Plans Use FASI?

- Assist in determining eligibility for Medicaid HCBS programs
- Assist in developing person-centered service plans
- Monitor quality and measure program impact
- Report across multiple programs within a state
Stakeholder Engagement: Build Value Propositions

- Stakeholders use, interact with, and benefit from functional assessments in different ways and for different reasons.
- Stakeholders have different perspectives about maintaining and changing current state assessment practices.

Person-centered approach

Standardization of functional status items

Elevates person’s voice within the assessment process

Supports transparent communication to enhance person-centered planning
FASI Performance Measures

Measures the percentage of home and community-based (HCBS) recipients aged 18 and over who have documented needs determined by FASI...

Newly Endorsed NQF 3593: Identifying Personal Priorities for FASI

AND who have identified at least as many total personal priorities (up to 3) as needs in the areas of Self-Care, Mobility, or Instrumental Activities of Daily Living (IADL) as determined by their most recent FASI assessment.

Alignment of services with needs

AND documentation of a comprehensive person-centered service plan that addressed identified functional needs within the reporting period.

Alignment of person-centered service plans with functional needs

To locate measure, visit the NQF website: https://www.qualityforum.org/Home.aspx
NQF 3593 Quality Measure: Why It Is Important

• The endorsement of NQF 3593 demonstrates a thorough and successful examination of the measure’s reliability, validity, and importance.

• In 2020, NQF’s Person-Centered Planning and Practice Committee released a report with a framework for quality measurement related to person-centered planning, especially for those in HCBS settings.

• This report specifically recognizes the FASI item set as one of the few person-centered assessments available and calls for quality measures that ensure that individuals’ needs, and priorities are appropriately assessed and documented within the individuals’ service plan.

States and managed care plans can incorporate the FASI set into Medicaid HCBS assessments and use the information for developing person-centered service plans that specify the type and level of services and supports necessary to meet those needs.
Oregon’s Use of FASI

Fred Jabin, representing Oregon Office of Developmental Disability Services
WHY WAS THE OREGON NEEDS ASSESSMENT (ONA) DEVELOPED?

- CMS required that everyone receiving I/DD services receive an annual functional needs assessment
- Oregon legislature required that ODDS (Oregon Developmental Disabilities Services) use a single assessment tool for all services
CURRENT ASSESSMENT TOOLS

Supports Intensity Scale (SIS)
  – Used for group homes, vocational services

Support Needs Assessment Profile (SNAP)
  – Used for Foster care homes

Adult Needs Assessment (ANA)
  – Used for adult’s in-home services

Child’s Needs Assessment (CNA)
  – Used for children’s in-home services
STAKEHOLDER INPUT

Stakeholders did a national search and narrowed it to four assessment tools:

• But eventually rejected all the tools

• ODDS decided to adapt the Adult Needs Assessment/Children’s Needs Assessment (ANA/CNA) to be used for all service elements
BACK TO THE DRAWING BOARD

- ODDS determined that it would adapt the ANA/CNA tools to be used for all the service elements
ANA/CNA NEEDED REVISIONS

• ODDS knew that there were some items in the ANA/CNA that weren’t reliable or valid

• ODDS held focus groups around the state to determine what stakeholders wanted changed in the ANA/CNA
TOP REQUESTS FOR THE ASSESSMENT PROCESS

1. Avoid Duplication
2. Get rid of repetitive answers
3. Don’t make us do the same thing over and over again
4. No need to reproduce similar responses
5. Remove repetition
6. Take out redundancy
7. Reiteration isn’t necessary
COMMON ISSUES AND CONCERNS

• Person Centered
• Avoid Duplication
• Simple to Use/Easy to Understand
• Covers the Needs
• Useful to Service Planning
• Meets State and Federal Requirements
HOPEFUL GOALS

• Free up time for Services Coordinators and Personal Agents.
• Less Probing of individual who receive services
• More accurate capturing of support needs
• Smoother more streamlined process
### SIDE BY SIDE COMPARISON

<table>
<thead>
<tr>
<th>Risk Identification Tool</th>
<th>Adult Needs Assessment</th>
<th>Level Of Care</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enters into contracts that he/she may not be able to complete</td>
<td>Shopping and Money management</td>
<td>Independently manages finances to ensure basic necessities are met?</td>
</tr>
<tr>
<td>Unsafe medication management</td>
<td>Medication Management Supports</td>
<td>Medical management</td>
</tr>
<tr>
<td>Significant risk of exploitation</td>
<td>Safety</td>
<td>Will take action to protect self from threatening acts or gestures?</td>
</tr>
<tr>
<td>Self-Injury</td>
<td>Behavior Supports -- Formal Plan</td>
<td>Observed behavior support needs</td>
</tr>
</tbody>
</table>
NEXT STEPS

• Combined all items into one large spreadsheet.
• Returned to stakeholders for additional input

“It is too long, and you missed _____
And you should add it”
RELIABILITY AND VALIDITY TESTING

• ODDS contracted with Mission Analytics

• MA determined that many of the items were unlikely to meet reliability and validity the way they were written

• Suggested using FASI items that had similar intent when available and used items from other tools if there weren’t FASI items
STAKEHOLDER REVIEW

• Stakeholders didn’t think the 3-day look back was a good fit for our services

• Items were changed to consider supports needed over the previous 30 days
THREE COMPONENTS

1. Documentation review
2. Face-to-face observation of the individual
3. Interview with individual and those they invite
PILOTING THE ONA

• ONA was tested using Inter-rater reliability

• Focus groups of ONA participants were interviewed and items cut
<table>
<thead>
<tr>
<th>FASI ITEMS USED</th>
<th>Adapted items from FASI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eating</td>
<td>Does the person walk?</td>
</tr>
<tr>
<td>Oral Hygiene</td>
<td>Walks 150 feet</td>
</tr>
<tr>
<td>Toileting Hygiene</td>
<td>1 step curb</td>
</tr>
<tr>
<td>Shower/Bath Self</td>
<td>12 steps</td>
</tr>
<tr>
<td>Upper Body Dressing</td>
<td>Wheels 150 feet</td>
</tr>
<tr>
<td>Lower Body Dressing</td>
<td>Light Shopping</td>
</tr>
<tr>
<td>Putting on/Taking off</td>
<td>Medication mgmt. oral</td>
</tr>
<tr>
<td>Roll Left to Right</td>
<td>Medication mgmt. inhalant</td>
</tr>
<tr>
<td>Sit to Stand</td>
<td>Medication mgmt. injectable</td>
</tr>
<tr>
<td>Chair/Bed to Chair Transfer</td>
<td></td>
</tr>
<tr>
<td>Toilet Transfer</td>
<td></td>
</tr>
<tr>
<td>Car Transfer</td>
<td></td>
</tr>
</tbody>
</table>

Adapted items from FASI

Does the person use a W/C?
Makes a light meal?
Housework?
Money management?
TRAINING

- ONA assessors attend a 2-day training to receive a certification to conduct ONAs.
- ONA assessors are also required to attend quarterly trainings (usually 4 hours) that address changes, error trends, and facilitation techniques.
- ONA assessors have a monthly call ins to address additional issues and ask questions.
- ONA assessors are assigned a Quality Assurance & Training (QAT) staff who can help them with difficult coding decisions.
QUALITY ASSURANCE

• Assessments are processed through a “flagging tool” that flags items that show possible inconsistencies in the ONA. QATs review flagged ONAs and make recommendations about needed changes to assessors.

• Assessors will be required to have a QAT review them conducting an ONA annually and will receive a certification to continue conducting ONAs if they meet coding requirements.
### SERVICE GROUPS

<table>
<thead>
<tr>
<th>Adult 18+</th>
<th>Adolescent 12 – 17</th>
<th>Child 4 – 11</th>
<th>Infant/Toddler 0 - 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Very low</td>
<td>1</td>
<td>Very Low to Low</td>
</tr>
<tr>
<td>2</td>
<td>Low</td>
<td>2</td>
<td>Moderate</td>
</tr>
<tr>
<td>3</td>
<td>Moderate</td>
<td>3</td>
<td>High</td>
</tr>
<tr>
<td>4</td>
<td>High</td>
<td>4</td>
<td>High to Very</td>
</tr>
<tr>
<td>5</td>
<td>Very High</td>
<td>5</td>
<td>High to Very</td>
</tr>
<tr>
<td>5(b)</td>
<td>5(m)</td>
<td>5</td>
<td>High to Very</td>
</tr>
<tr>
<td>5(b)</td>
<td>5(m)</td>
<td>5</td>
<td>High to Very</td>
</tr>
<tr>
<td>5(b)</td>
<td>5(m)</td>
<td>5</td>
<td>High to Very</td>
</tr>
<tr>
<td>5(b)</td>
<td>5(m)</td>
<td>5</td>
<td>High to Very</td>
</tr>
</tbody>
</table>
EXCEPTIONS

An exception process is available for those whose Service Group does not meet their support needs.
AUTOMATED SYSTEM
LESSONS LEARNED

• It is very difficult to find objective criteria to determine support needs for human beings with diverse issues in a person-centered manner

• Flexibility and the ability to use professional judgment for outliers is key

• The funding algorithm should be considered at the same time the items and coding are chosen

• Don’t have an international pandemic during the final steps of implementation

For further information about Oregon’s ongoing FASI use, please contact Chelas Kronenberg, Office of Developmental Disabilities Services.
Colorado’s Use of FASI
Michelle Topkoff, Colorado Department of Health Care Policy & Financing
Current Assessment Tools

The current tools used to assess LTSS populations include:

- **ULTC 100.2**
  - Home-grown tool

- **Supports Intensity Scale (SIS) for I/DD Populations**
  - Standardized, nationally used tool

- **Supplemental tools**
  - Over 30 supplemental tools created by Department and local staff to support access processes

Assessment and access processes vary significantly across populations and programs
Limitations to Legacy Tools

ULTC 100.2

- No set timeframes (e.g., in last 30 days)
- Definitions and responses are vague and overlapping
- Collects very little information outside of ADLs
- Limited use when developing support plan

SIS

- Requires agency staff to be specially trained on tool and pay for training/tool
- Some stakeholders unhappy with the use of the SIS: length of time to complete; concerns that it doesn’t capture enough information; concerns about the use for development of Support Levels
Limitations to Legacy Tools (cont.)

Local agencies have developed 30+ non-standardized tools to collect missing information from legacy tools

Other issues with tools include:

- No person-centered information
- No natural support and caregiver information
- No screen of other areas of interest/need (e.g., employment, self-direction)
- Very limited information that is useful for support planning
Stakeholder Input into the Development of the Process

Stakeholder input during development of the intake and assessment tools included:

- Input from community members and staff from over 15 agencies
- 8 stakeholder meetings on child assessment tool
- 21 stakeholder meetings on adult assessment tool

Stakeholders were presented with a variety of national and state-specific tools:
- interRAI
- Washington’s CARE
- CMS’ CARE (FASI)
- MnCHOICES
Developed a blog to share information and collect feedback: [Colorado Assessment Blog](#)

Made major changes to the modules and process as a result of stakeholder input

Now conducting meetings throughout state to share progress and gather feedback
# Colorado Crosswalk of LTSS Assessment Tools

## Crosswalk of LTSS Assessment Tools by Purposes of Tools Endorsed by Stakeholders and States

<table>
<thead>
<tr>
<th>Purpose of Tools</th>
<th>INTERAI</th>
<th>CARE</th>
<th>WI</th>
<th>MN</th>
<th>WA</th>
<th>MA</th>
<th>SIS</th>
<th>ICAP</th>
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</thead>
<tbody>
<tr>
<td>Person-Centered</td>
<td>Could Add</td>
<td>Could Add</td>
<td>Could Add</td>
<td>Included</td>
<td>Could Add</td>
<td>Could Add</td>
<td>Limited</td>
<td>Limited</td>
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<tr>
<td>Self-Direction</td>
<td>Could Add</td>
<td>Could Add</td>
<td>Could Add</td>
<td>Included</td>
<td>Could Add</td>
<td>Could Add</td>
<td>Limited</td>
<td>Limited</td>
</tr>
<tr>
<td>Coordination w/ medical services</td>
<td>Yes</td>
<td>Facilitates</td>
<td>Facilitates</td>
<td>Facilitates</td>
<td>Facilitates</td>
<td>Facilitates</td>
<td>Limited</td>
<td>Limited</td>
</tr>
<tr>
<td>Employment</td>
<td>Could Add</td>
<td>Could Add</td>
<td>3 Items</td>
<td>Included</td>
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<td>Determining eligibility for different populations</td>
<td>EBD</td>
<td>Yes</td>
<td>Developing</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Mental Health</td>
<td>Yes</td>
<td>Developing</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
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<tr>
<td>IDD</td>
<td>Yes</td>
<td>Developing</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Brain Injury</td>
<td>Yes</td>
<td>Developing</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
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<tr>
<td>Spinal Cord Injury</td>
<td>Yes</td>
<td>Developing</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
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<td>Children</td>
<td>Yes</td>
<td>No Plans</td>
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<td>Yes</td>
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<td>Resource Allocation</td>
<td>EBD</td>
<td>Existing</td>
<td>Could Develop</td>
<td>State-specific</td>
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<tr>
<td>Mental Health</td>
<td>Developing</td>
<td>Could Develop</td>
<td>State-specific</td>
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<td>State-specific</td>
<td>No</td>
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<tr>
<td>IDD</td>
<td>Existing</td>
<td>Could Develop</td>
<td>State-specific</td>
<td>State-specific</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Brain Injury</td>
<td>Existing</td>
<td>Could Develop</td>
<td>State-specific</td>
<td>State-specific</td>
<td>State-specific</td>
<td>State-specific</td>
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<td>No</td>
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<tr>
<td>Spinal Cord Injury</td>
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<td>State-specific</td>
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<tr>
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<td>No</td>
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<tr>
<td>Operations</td>
<td>Intake &amp; Triage tools</td>
<td>Existing</td>
<td>Could Develop</td>
<td>State-specific</td>
<td>State-specific</td>
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<td>Support Planning Tools</td>
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<td>State-specific</td>
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<td>Yes</td>
<td>Yes</td>
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<td>Quality</td>
<td>Clinical/Functional Issues</td>
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<td>State-specific</td>
<td>Could Develop</td>
<td>Yes</td>
<td>Could Develop</td>
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<td>Empirically Validated</td>
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<td>Could Add</td>
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<td>Used in Other States</td>
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<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
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</tr>
</tbody>
</table>
Tools Selected as Starting Point for the Assessment Process

After careful review, Department and stakeholders decided to use components of the following tools:

CMS’ CARE tool
(Later changed to FASI)

- Standardized items throughout the tool (e.g., functioning, health)

Minnesota’s MnCHOICES comprehensive assessment

- Modular format would serve as basis for CO process
- Person-centered items and modules (e.g., Personal Story)
- Items CARE/FASI did not contain (e.g., Psychosocial/Behaviors)
Approach for Developing the New Assessment Process

- **Understand** current LTSS assessment process
- **Identify** how processes can be improved (redesign goals and outcomes)
- **Identify** existing tools to be included in the new assessment process
- **Customize** the tools to meet Colorado’s needs
- **Pilots** for components of the process
- **Adapt** process for children
- **Develop** plans for Person-centered Support Plan, automation, full-scale testing, and statewide implementation
Other LTSS Systems Changes New Assessment Process will Support

- More **person-centered system**
- More **informed choice** about self-direction
- **Restructuring case management** including being able to tailor amount and type to participant preferences and needs
- Foster **competitive employment**
- **Support** emerging separation of eligibility assessment vs. support planning and ongoing case management
Objective and empirically-based **person-centered budgets**

Give people more choice and control over services

Allows expansion of consumer-directed principles to other services

Enhance **quality management efforts**, including quality of life/participant experience data
New Assessment and Person-Centered Support Plan is finalized

Designing and developing the IT system automation of the assessment instruments and process

Following GO LIVE of system/assessments, will finalize person-centered budget algorithm using assessment data

Standardized data will inform performance measures and quality improvement strategies
CMS Data Element Library and LOINC
Lorraine Wickiser, CMS
Interoperability: Different Lenses, Shared Goals

Individuals should have the ability to move from payer to payer, provider to provider, and have both their clinical and administrative information travel with them throughout their journey.
- CMS Interoperability and Patient Access Final Rule

Individuals, their families and health care providers should be able to send, receive, find and use electronic health information in a manner that is appropriate, secure, timely and reliable to support the health and wellness of individuals through informed, shared decision-making.
- ONC Shared Nationwide Interoperability Roadmap, Version 1

The ability of two or more systems or components to exchange information and to use the information to make better decisions.
- Administration for Children and Families (ACF)

Source: CMS InCK Model Informational Webinar on Interoperability, July 28, 2020 and CMS Interoperability and Patient Access Final Rule
FASI Implementation: CMS Data Element Library and Interoperability

FASI is included in several current interoperability initiatives:

- CMS Data Element Library (DEL), which serves as a repository of data elements used in CMS Assessment Instruments and their associated health IT standards.

- Logical Observation Identifiers Names and Codes (LOINC), a clinical terminology standard that provides a set of universal codes and structured names to unambiguously identify things you can observe and measure.

- PACIO-eLTSS-PAC Transition Summary Use Cases
DEL 101: What is the CMS Data Element Library?

• The CMS DEL is the centralized resource for CMS assessment instrument data elements (e.g., questions and responses) and their associated health information technology (IT) standards.

• The purpose of the DEL is to:
  • Promote interoperable health information exchange,
  • Support “Participants over Paperwork”, and
  • Assist with standardization of assessment data elements to help facilitate care coordination.

• The DEL includes CMS assessment instruments across multiple care settings.

• The DEL does not contain personal health information (PHI).

Visit the DEL at: https://del.cms.gov

Source: CMS website: https://del.cms.gov/DELWeb/pubHome
What are the Goals of the DEL?

• Supports provider exchange of electronic health information for better care coordination to facilitate real-time, data driven, clinical decision making.
• Enables more seamless/less costly health information exchange.
• Reduces overall provider burden through use and exchange of health care data.
• Promotes high quality, personalized, efficient health care.
• Maintains consistency in format, meaning, and use of Assessment Instrument data element.
• Allows for access to and enables reuse and exchange of data elements.

Source: CMS Data Element Library HCBS Conference Presentation
LOINC 101: What are LOINC Codes?

- LOINC is the universal standardized language for identifying clinical tests and observations, for example, laboratory tests or vital signs.

- It is a common language for identifying health measures, observations and documents.

- LOINC codes represent the “question” for a test or measurement (in this case, FASI questions) and the person specific input represents the answer, or from FASI response scales (e.g., independent, partial/moderate assistance)

Source: LOINC home website: https://loinc.org/get-started/what-loinc-is/
Post Acute Care Interoperability (PACIO) Project

The PACIO Project is a collaborative effort to:

- Advance interoperable health data exchange between post-acute care (PAC) and other providers, participants, and key stakeholders

- Promote health data exchange in collaboration with policy makers, standards organizations, and industry through a consensus-based approach.

- [http://pacioproject.org](http://pacioproject.org)

Helpful Resources and Technical Assistance Opportunities
Helpful Websites

FASI Version 1.1. Please email the HCBS Measures Inbox at HCBSMeasures@Lewin.com for a copy of the FASI Template V1.1.

CMS Data Element Library: https://del.cms.gov/DELWeb/pubHome

LOINC FASI Codes: https://loinc.org/94848-9/

Post-Acute Care Interoperability Project (PACIO): https://confluence.hl7.org/display/PC/PACIO+Project+Functional+Status


Technical Assistance Available

FASI technical assistance is available free from the Lewin Group for interested state and local agencies and managed care plans, including:

- One-on-one assistance with planning, analysis, and using FASI performance measures to inform quality improvement activities

- FASI Early Adoption Work Group

- Contact hcbsmeasures@lewin.com for more information or to request TA
Thank You