

Re: CMS-10243

The American Health Care Association (AHCA) and National Center for Assisted Living (NCAL) appreciates the opportunity to provide comments on the Testing Experience and Functional Tools: Functional Assessment Standardized Item (FASI) data collection.

AHCA/NCAL is the nation's leading association representing more than 13,000 long term and post-acute care providers who care for over one million patients and residents. By delivering solutions for quality care, AHCA/NCAL aims to improve the lives of the millions of frail, elderly and individuals with disabilities who receive long term or post-acute care in our member communities and centers each day.

AHCA/NCAL agrees that assessments to assist in understanding the needs of the individuals served through home and community based services (HCBS) are critical in providing services that best suits that person. After review of the FASI tool, AHCA/NCAL had some concerns and suggestions for your consideration.

Questions in the FASI ask about the "ability" of an individual -- but the response options assess performance, which differs from someone's ability to complete a task. If an individual has the ability to do something, but this is not reflective in their performance, this could be identified as an opportunity to encourage self-performance or a more independent performance. Opportunities such as these can be useful for person-centered care planning.

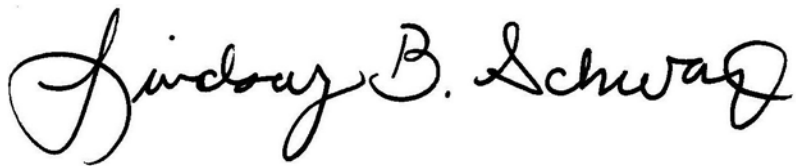
The options for coding "Safety and Quality of Performance" when the activity is not attempted should include a choice that there was not an opportunity for an individual to engage in the activity. An individual receiving services may not have the opportunity to prepare a light meal or clean if they receive these services but are capable of doing these activities, if given the chance.

The look-back period of three days or if there is a change in the past month to code the most dependent state may not be reflective of an individual's usual performance in the past month. It is important, as the FASI has captured, to understand the most dependent state of an individual's performance -- but it is equally important to understand an individual's usual performance. An individual's usual performance could be drastically changed due to an acute illness in the past three days, which would skew the results of the assessment.

AHCA/NCAL asks that this assessment effort be coordinated with other initiatives such as the National Quality Forum's (NQF) HCBS Committee and rules including the CMS HCBS Final Rule and the Medicaid Managed Care Rule. Including consideration on how the items, such as resident priorities in each FASI section can be utilized with the Final Rule as to reduce overlap and response burden from both residents and providers.

We appreciate your consideration of our feedback on the FASI. For questions or to discuss these comments further, please contact Lindsay B. Schwartz at 202-898-2848 or lschwartz@ncal.org.

Sincerely,

A handwritten signature in black ink that reads "Lindsay B. Schwartz". The signature is written in a cursive, flowing style with a large initial "L" and a stylized "S" at the end.

Lindsay B. Schwartz, Ph.D., Senior Director
Workforce & Quality Improvement