

The Guiding and Improved Dementia Experience (GUIDE) Model: A CMS payment model test to support people living with dementia and their family caregivers



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Housekeeping

- All participants will be muted
- Enter all questions in the Zoom Q&A/chat box and send to Everyone
- Moderator will review questions and ask them at the end
- Want to continue the discussion? Associated podcast released about 2 weeks after Grand Rounds
- Visit <u>impactcollaboratory.org</u>
- Follow us on Twitter & LinkedIN:



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Learning Objectives

Upon completion of this presentation, you should be able to:

- Review the historical context of the CMS GUIDE Model and its potential for transforming the delivery, quality and outcomes of dementia care in the United States.
- Learn the requirements for participating health systems regarding care delivery and outcomes reporting.
- Understand how the GUIDE Model requirements align with evidence-based comprehensive dementia care, including new opportunities and challenges for pragmatic evaluation of dementia service delivery related to GUIDEparticipating health systems.



NIA IMPACT Collaboratory

• <u>Mission</u>: "To build the nation's capacity to conduct pragmatic clinical trials of interventions embedded within health care systems for people living with dementia and their care partners."

• <u>Vision</u>: "To transform the delivery, quality, and outcomes of care provided to Americans living with dementia and their care partners by accelerating the testing and adoption of evidence-based interventions within health care systems."



National Alzheimer's Project Act (NAPA)

- Signed into law January 2011
- Public / Private Advisory Council on Alzheimer's Research, Care and Services
- National Plan to Address Alzheimer's disease:
 - Prevent and Effectively Treat AD/ADRD by 2025.
 - Enhance Care Quality and Efficiency.
 - Expand Supports for People with AD/ADRD and Their Families.
 - Enhance Public Awareness and Engagement.
 - Improve Data to Track Progress.
 - Accelerate Action to Promote Healthy Aging and Reduce Risk Factors for AD/ADRD.



Federal Programs and Initiatives

- Administration for Community Living (ACL)
- Centers for Disease Control and Prevention (CDC)
- Health Resources and Services Administration (HRSA)
- Veterans Health Administration (VHA)
- National Institute on Aging (NIA)
 - National Research Summit(s) on Care, Services and Supports for People Living with Dementia and their Care Partners / Caregivers
 - National Academies of Sciences, Engineering and Medicine (NASEM) reports
- Centers for Medicare and Medicaid Services



Recommendations to Improve Payment Policies for Comprehensive Dementia Care

- One-day convening at Education Development Center in Washington, DC
- Over 50 national experts in dementia care from diverse perspectives
- Recommendations:
 - Payments for services to family caregivers
 - New research to determine success metrics
 - Education for consumers, providers and policymakers
 - Advance a population health model approach to tier coverage based on risk and need within a health system



Elements of Comprehensive Dementia Care

- Continuous Monitoring and Assessment
- Ongoing Care Plans
- Psychosocial Interventions
- Self-Management

- Caregiver Support
- Medication Management
- Treatment of Related Conditions
- Coordination of Care

Comprehensive Care for Alzheimer's Act

- Senate 626 in the 118th Congress (2023-24)
- "This bill allows the Center for Medicare and Medicaid Innovation (CMMI) to test a Dementia Care Management Model that provides comprehensive care to Medicare beneficiaries with Alzheimer's disease or a related dementia."
- "Under the model, participating health care providers receive payment under Medicare for comprehensive care management services that are provided to individuals with diagnosed dementia, excluding Medicare Advantage enrollees, hospice care recipients, and nursing home residents. Required services include medication management, care coordination, and health, financial, and environmental monitoring, as well as trainings and other support services for unpaid caregivers. Providers must furnish services through interdisciplinary teams and must ensure access to a team member or primary care provider 24-7. The CMMI must set payments and determine quality measures for the model in accordance with specified requirements."
- "The bill also allows the CMMI to design a similar model under Medicaid."



Payment for Comprehensive Dementia Care: Five Key Recommendations

- 1. The payment model should cover comprehensive dementia care that meets quality outcomes measures.
- 2. The payment model should address both beneficiary and caregiver needs.
- 3. To be eligible, beneficiaries must have a diagnosis of dementia.
- 4. Comprehensive dementia care programs should be widely available to Medicare beneficiaries, especially those living in rural and underserved communities who have traditionally had difficulty accessing health care systems.
- 5. The payment model should be capitated based on the severity of symptoms and available resources.



Biden-Harris Administration April 2023 Executive Order 14095: Increase Access to High-Quality Care

- "Make child care and long-term care more accessible and affordable for families."
- Support for family caregivers
- Included a direction to HHS to:
 - "consider whether to select for testing by the Center for Medicare and Medicaid Innovation an innovative new health care payment and service delivery model focused on dementia care that would include family caregiver supports such as respite care."



The Guiding an Improved Dementia Experience (GUIDE) Model

- Announced July 31, 2023 by the Centers for Medicare & Medicaid Services
- To support the GUIDE Model and other innovations:
 - National Dementia Care Collaborative (NDCC)
 - NDCC "Autumn Summit: CMS GUIDE Model: Choices for Implementing Evidence-based Dementia Care"
 - 3-hour virtual event
 - November 28, 2023
 - Archived at NDCC.edc.org



The National Dementia Care Collaborative (NDCC) aims to...

• Improve access to evidence-based comprehensive dementia care.

 Provide a common platform for health systems and other provider organizations implementing or interested in implementing a proven model of comprehensive dementia care.



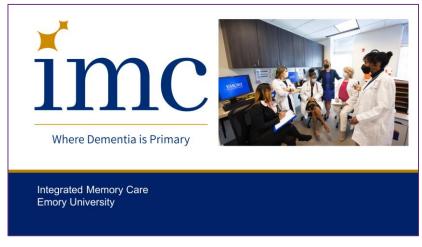
Comprehensive Dementia Care Models













Overview | CMS Innovation Center Statute

"The purpose of the [Center] is to test innovative payment and service delivery models to reduce program expenditures...while preserving or enhancing the quality of care furnished to individuals under such titles"



Three scenarios for success:

- 1. Quality improves; cost neutral
- 2. Quality neutral; cost reduced
- 3. Quality improves; cost reduced (best case)

A model that meets one of these three criteria (and other statutory prerequisites), can be expanded in duration and scope through rulemaking



Evaluating Results and Advancing Best Practices



cmmI uses independent evaluators to routinely and rigorously assess the impact of each model on quality of care and program expenditures



CMMI seeks to advance models that generate net savings and represent high-value investments of taxpayer dollars while maintaining or improving quality of care



The Secretary of Health & Human Services has the authority¹ to expand the duration and scope of a model being tested... including implementation on a nationwide basis².



CMMI Strategy | 2021 Strategic Refresh: A Vision for the Next Decade





CMS Has Run Five Previous Dementia Care Projects

Project	Focus	Setting	Workforce	Intensity	Duration#
HCIA* Dementia Care Ecosystem (Ecosystem) 2015-2017	Care planning, support	Telehealth ^	Non-clinical navigators; IDT	Varied by disease acuity, monthly phone contact or every 3-4 months	12 months
HCIA* Maximizing Independence (MIND) at Home 2015-2017	Barriers to care, navigation	Home	Non-clinical memory care coordinators; IDT	Home visit every 2 months, weekly phone contact	18 months
HCIA* Alzheimer's and Dementia Care (ADC) 2012-2015	Partnership with community-based services	Clinic	Nurse practitioners; IDT	Annual clinic visit, quarterly phone contact	25 months ^X
HCIA* Aging Brain Care (ABC) 2012-2015	Barriers to care, navigation	Home	Lay health workers; IDT	Quarterly home visit, monthly phone contact	32 months ^X
Medicare Alzheimer's Disease Demonstration and Evaluation (MADDE) ⁺ 1989-1994	Direct payments to beneficiaries to help cover care needs	Home	Nurse case managers; IDT	In-home assessment, updated every 6 months by phone	36 months

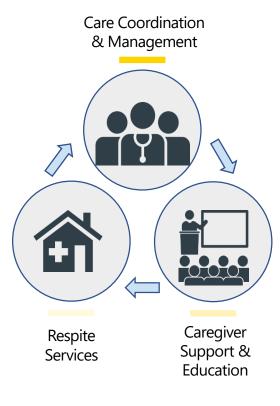
[#] Exposure to the intervention and evaluation follow-up period. X Average number of months enrolled in the project. 18



[^] Care team navigators primarily engaged beneficiaries and caregivers by telephone and occasionally in person.

Model Purpose and Overview

The GUIDE Model will test whether a comprehensive package of care coordination and management, caregiver support and education, and respite services can **improve quality of life for people with dementia and their caregivers** while **delaying avoidable long-term nursing home care** and **enabling more people to remain at home** through end of life.



Care Coordination & Management

Beneficiaries will receive care from an interdisciplinary team that will develop and implement a comprehensive, personcentered care plan for managing the beneficiary's dementia and co-occurring conditions and provide ongoing monitoring and support.

Caregiver Support & Education

will provide a caregiver
support program, which
must include caregiver skills
training, dementia diagnosis
education, support groups,
and access to a personal care
navigator who can help
problem solve and connect
the caregiver to services and
supports.

Respite Services

A subset of beneficiaries in the model will be eligible to receive payment for respite services with no cost sharing, up to a cap of \$2,500 per year. These services may be provided to beneficiaries in a variety of settings, including their personal home, an adult day center, and facilities that can provide 24-hour care to give the caregiver a break from caring for the beneficiary.



Scope and Duration

The GUIDE Model is an 8-year voluntary model offered in all states, D.C., and U.S. territories. The Model Performance Period will begin on July 1, 2024, and end on June 30, 2032.



Established Program Track and New Program* Track

The purpose of the two tracks is to allow established programs to begin their performance in the model on July 1, 2024, while giving organizations that do not currently offer a comprehensive community-based dementia care program, including safety net organizations, time and support to develop their program.

Model Timeline

	Nov. 15 2023	July 2024-	July '25-	July '26-	July '27-	July '28-	July '29-	July '30-	July '31-
	- Jan. 30 2024	June 2025	June '26	June '27	June '28	June '29	June '30	June '31	June '32
Established	Application	Performance Year	PY 2	PY 3	PY 4	PY 5	PY 6	PY 7	PY 8
Program Track	Period	(PY) 1							
New Program	Application	Pre-Implementation	PY 1	PY 2	PY 3	PY 4	PY 5	PY 6	PY 7
Track	Period	(PI) Period							

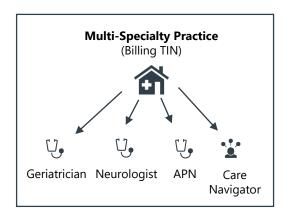
^{*}New program development is intended to help increase beneficiary access to specialty dementia care, particularly in underserved communities.

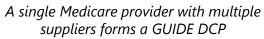


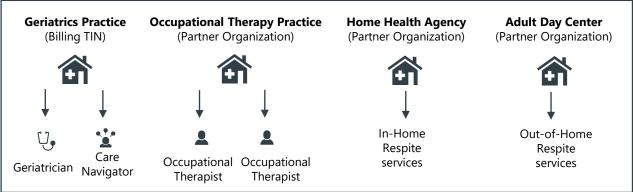
Who is Eligible to Participate in GUIDE?

GUIDE participants will be Medicare Part B enrolled providers/suppliers, excluding durable medical equipment (DME) and laboratory suppliers, who are eligible to bill for Medicare Physician Fee Schedule service and agree to meet the care delivery requirements of the model. If the GUIDE participant can't meet the GUIDE care delivery requirements alone, they have the ability to contract with "Partner Organizations," which may be other Medicare providers/suppliers or non-Medicare enrolled organizations, to meet the care delivery requirements

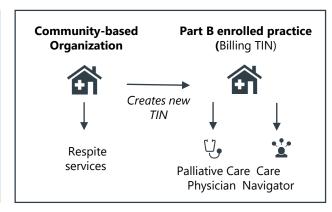
Example Dementia Care Program provider and supplier arrangements:







Several Medicare providers and multiple suppliers form a DCP



Medicare-enrolled provider establishes a new Part B enrolled TIN to form a GUIDE DCP

GUIDE is an 8-year voluntary model offered in all states, D.C., and the U.S. territories.



Eligible Beneficiaries

The GUIDE Model is designed for community-dwelling Medicare FFS beneficiaries, including beneficiaries dually eligible for Medicare and Medicaid. Eligibility criteria for Model beneficiaries are outlined below:



Voluntary Alignment Process

The GUIDE Model will use a voluntary alignment process. Participants must document that a beneficiary (or their legal representative if applicable) consents to align to the Participant.

Participants may request a list of potential beneficiaries who may be eligible for voluntary alignment. Additionally, Participants may have beneficiaries self-referred to them based on letters sent by CMS, or by other provider referrals.



Care Delivery Requirements

Participants must provide specified services across the domains outlined below. Participants will tailor the exact mix of services based on each beneficiary's individual care plan.

Interdisciplinary

Care Team

24

COMPREHENSIVE ASSESSMENT

Beneficiaries and caregivers receive separate assessments to identify their needs and a home visit to assess the beneficiary's safety.

CARE PLAN

Beneficiaries receive care plans that address their goals, preferences, and needs, which helps them feel certain about next steps.

24/7 ACCESS

Beneficiaries and caregivers can call a member of their care team or a third-party representative using a 24/7 helpline.

ONGOING MONITORING & SUPPORT

Care navigators provide long-term help to beneficiaries and caregivers so they can revisit their goals and needs at any time and are not left alone in the process.

REFERRAL & SUPPORT COORDINATION

Beneficiaries' care navigator connects them and their caregivers to communitybased services and supports, such as homedelivered meals and transportation.

CAREGIVER SUPPORT

Caregivers take educational classes and beneficiaries receive respite services, which helps relieve the burden of caregiving duties.

MEDICATION MANAGEMENT

Clinician reviews and reconciles medication as needed; care navigators provide tips for beneficiaries to maintain the correct medication schedule.

CARE COORDINATION & TRANSITION

Beneficiaries receive timely referrals to specialists to address other health issues, such as diabetes, and the care navigators coordinate care with the specialist.



Payment Methodology



Dementia Care Management Payment (DCMP)

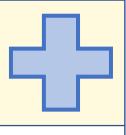
- Per beneficiary per month payment
- DCMP replaces Physician Fee Schedule (PFS) billing for certain care management services
- Each model tier will have a different PBPM rate





Adjustments

- Performance Based Adjustment (PBA), a **percentage adjustment to the DCMP** depending on how Participants perform on model **quality metrics**
- Health Equity Adjustment (HEA) applied to the DCMP based on beneficiary-level health equity scores





Payment for respite services

- Participants will be able to bill for respite services for beneficiaries with a caregiver and moderate to severe dementia, up to a \$2,500 annual cap
- Respite could include in-home, adult day health, or facility-based care

Participants in the new program track that are classified as safety net providers will also be eligible to receive an infrastructure payment to cover some of the upfront costs of establishing a new dementia care program. Safety net provider status will be defined based on the share of a provider's patient population that receives the Medicare Part D Low Income Subsidy or is dually eligible for Medicare and Medicaid.



Payment Adjustments

When participants bill the per beneficiary per month Dementia Care Management Payment (DCMP), the DCMP will be adjusted by a Performance-Based Adjustment (PBA), as well as a Health Equity Adjustment (HEA).

The Health Equity Adjustment (HEA) is designed to decrease the resource gaps in serving historically disadvantaged communities. The Performance Based Adjustment (PBA) will increase or decrease participants' monthly DCMPs, depending on how they perform during the previous performance year.

HEA will be based on certain social risk factors, which include:

PBA will range from -3.5% to +10% and calculated from five model performance metrics across four domains that include:

	National Area Deprivation Index (ADI)
	State Area Deprivation Index (ADI)
	Low-Income Subsidy Status (LIS)
$\bigcirc\!$	Dual Eligibility Status

DOMAIN	METRICS				
Care Coordination and Management	High-risk medications (eCQM/CQM) (MIPS #238)				
Beneficiary quality of life	Quality of life outcome (Survey-based) (MIPS #AAN22)				
Caregiver Support	Caregiver Strain (Survey-based)				
	Total Per Capita Cost (Claims-based)				
Utilization	Long-term nursing home stay rate (Claims-based)				



GUIDE Data Reporting Requirements

All Innovation Center model participants are required to collect and report data deemed necessary to monitor and evaluate the model, including "protected health information". GUIDE will require Participants to report the following:



Quality Data

- Caregiver Burden survey
- Quality of Life survey
- High-risk medication measure

Care Delivery Data

 Care delivery reporting survey

Beneficiary and Caregiver Assessment Data

- Zarit Burden Interview
- Clinical Dementia Rating
 or Functional Assessment
 Staging Tool

Sociodemographic & Health Related Social Needs Data

- Accountable Health Communities HRSN Tool
- Protocol for Responding to and Assessing Patient's Assets, Risks, and Experiences



Evaluation Requirements

 Cooperate with an independent, federally-funded evaluation as required by statute.*



- Activities typically include
 - completion of surveys
 - participation in interviews and site visits
 - other activities deemed necessary to conduct a comprehensive evaluation.



^{*} Section 1115A of the Social Security Act (added by Section 3021 of the Affordable Care Act). The evaluation will inform any decision by the Secretary to expand through rulemaking the duration and scope of the model, as specified under Section 1115A(c).

Evaluation will use a mixed methods approach

Approach

- Use claims to identify aligned beneficiaries and a comparison group of similar beneficiaries not in the model.
- Collect quality data from participants and non-participants.
- Examine trends in quality, long-term nursing home stays, Medicare and Medicaid service use and expenditures
- Conduct interviews and site visits

Potential Effects*

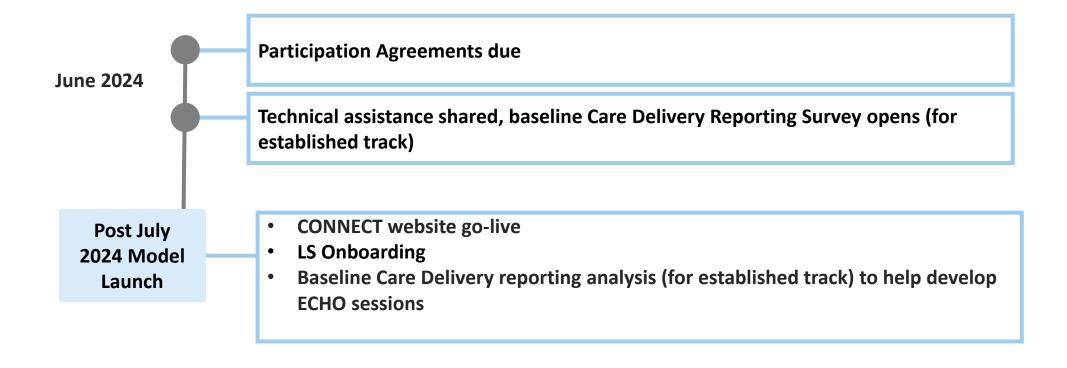
- Improvements in quality of life and caregiver burden
- Reductions in long-term nursing home stays, Medicare and Medicaid service use and expenditures
- Better experience of care for beneficiaries, caregivers, and providers
- Transformation in the delivery of care for people with dementia





^{*}Assuming participant and beneficiary recruitment targets are met and the comparison group submits sufficient quality of life and caregiver burden data to CMS.

GUIDE Learning System Activities through September 2024



CONNECT site

Bi-directional Feedback & Insights

CMS will understand, track, and respond to participant priorities.

Peer-to-Peer Learning

Participants engage with each other, share strategies, and create a network.

Content Library

Platform to host event calendar and resources, so participants can access learning materials.

Model Resources

The GUIDE Model team has a host of resources to support interested organizations. To see the latest resources, visit the <u>Model's website</u> at <u>https://innovation.cms.gov/innovation-models/guide</u>.



Frequently Asked Questions

Please reference the <u>list of FAQs</u> on the Model's website for answers to common questions.



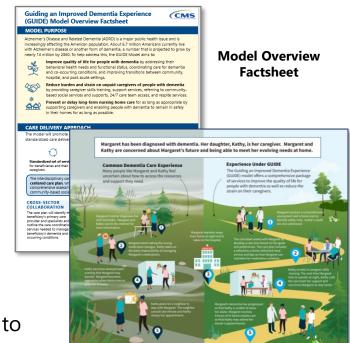
Model Factsheets

Model Overview Factsheet, Dementia Pathways Infographic, Strength in Partnerships Factsheet, and Participant Incentives Factsheet may be found on the Model's website.



Helpdesk

If you have questions for the GUIDE Model team, please reach out to us via email at <u>GUIDEModelTeam@cms.hhs.gov</u>.



Dementia Pathways Infographic



Applying an Evidence-Based Approach to Comprehensive Dementia Care Under the New GUIDE Model

The CMS GUIDE Model offers a unique opportunity



- Evidence-based models are available for implementation
- GUIDE helps make comprehensive dementia care financially viable
- The National Dementia Care Collaborative (NDCC) is working to:
 - Promote and aid adoption of evidence-based comprehensive dementia care
 - Ensure that the pool of participants in GUIDE is enriched by inclusion of sufficient numbers of health systems relying with fidelity on one or more evidence-based programs as core components of the healthcare delivery



Evidence-Based Programs (EBP): Background

	Aging Brain Care (ABC) Program	Alzheimer's and Dementia Care (ADC) Program	Benjamin Rose Institute (BRI) Care Consultation	Care Ecosystem	The Integrated Memory Care (IMC) program	Maximizing Independence (MIND) at Home
Home Organization	Indiana University	University of California Los Angeles	Cleveland-based Non-Profit	University of California San Francisco	Emory University	Johns Hopkins University
Program Base	Health System	Health System	Community	Community Health System	Health System	Community Health system
Cost per enrollee per month	\$	\$\$	\$\$	\$\$	\$\$	\$\$
Caseload per Care Navigator	125	250-300 (with assistant)	75-100	75	500	75 (per Community Health Worker)
Number of Dissemination Sites Currently Seeing Patients	7	9 National Dementia	31 Care Collaborative ndcc.	15 edc.org	0	7
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GUIDE/EBP Interdisciplinary Team Structure

	GUIDE	Aging Brain Care (ABC) Program	Alzheimer's and Dementia Care (ADC) Program	Benjamin Rose Institute (BRI) Care Consultation	Care Ecosystem	The Integrated Memory Care (IMC) program	Maximizing Independence (MIND) at Home
Care Team Terms	Care Navigator	Care Coordinator Assistants	Dementia Care Specialist	Care Consultants	Care Team Navigator	LCSW, RN	Memory Care Coordinator + Memory Care Manager
	Dementia Proficient Clinician	Geriatrics	Program Medical Director	NA	Licensed dementia provider team	Geriatric Specialist NP	Medical director, Director of nursing
			Advanced				

Advanced **Practice Provider** Non-licensed **Care Navigator** (NP, PA, Clinical Non-licensed SW/RN None Non-licensed SW/RN (e.g., CHW)+ RN, **Credentials** Nurse Specialist SW, NP, APP w/ prescribing 34 capabilities)

Alignment with GUIDE Program Components

			ABC	ADC Program	BRI CC	Care Ecosystem	IMC	MIND at Home
Care Navigator Training	GUIDE Req	uired Training Content Areas	√	√	√	√	✓	√
Program-Specific Training Delivery	Experiential Live (virtual or inperson)	√	√	√	√	√	√	
	Asynchronous online	√	√		√	✓	√	
Mode of Care	Delivery	In-Person	√	√		Site-Specific	✓	√
	In-Home Visits	√	Site-Specific		Site-Specific	✓	√	
	Telephone	√	√	✓	√	✓	√	
		Telehealth Video		✓	√	√	✓	√
		Portal/EHR		✓	\checkmark		✓	35 🗸

Alignment with GUIDE Care Delivery Requirements								
GUIDE Care Delivery Requirements	ABC	ADC Program	BRI CC	Care Ecosystem	IMC	MIND at Home		
1. Comprehensive Assessment Initial comprehensive assessment and reassessments each year.	√	√	√	√	√	√		
2. Care Plan Beneficiaries receive care plan	√	√	√	√	√	√		
3. 24/7 Access Member of care team or third-party	√	\checkmark	Online Portal		√	Depends on		

representative

Management

care settings

revisit goals and needs

4. Ongoing Monitoring and Support

5. Care Coordination and Transitional Care

6. Referral and Coordination

of Services and Supports

community-based services

Provide long-term help to CG and beneficiaries to

Coordinate with PCP, coordinate with specialists, support transitions between personal home and

Care navigator connects beneficiary and CG to

Only

site

GUIDE Care Deliv	_		ABC	ADC Program	BRI CC	Care Ecosystem	IMC	MIND at Home
7. Caregiver Support	Education provided	Caregiver Skills Training	√	√	√	√	√	✓
		Dementia Dx Information	✓	√	✓	✓	√	✓
		Support group services	✓	✓	Through Referral	Through Referral	√	Through Referral
		Ad-hoc 1:1 Support Calls	✓	√	✓	✓	✓	✓
	Beneficiary receives respite (required in-home), can be outside agency		√	Through contracts	Through Referral			
8. Medication Management	Clinician reviews and reconciles medication		✓	√		√	√	Site Dependent
	Care Navigat maintain sch	or provides tips to ledule	✓	√	✓	✓	✓	✓
9. Care Coordination and Transition	Beneficiaries referrals to s	s receive timely pecialists	✓	√	✓	✓	✓	✓
	Care Navigat with speciali	ors coordinate sts	√	√	√	√	√	3♥

Evidence Related	to GUIDE Pe	erformance	Metrics	5
Care (ABC) Den	neimer's and mentia Care OC) Program Consultation	The Integrated Care Ecosystem Care (IMC)	Maximizing Independence (MIND) at Home	GUIDE Proposed Metrics

Cost

Neutral

program

High-risk

medications

(eCQM/CQM)

Quality of life

Zarit Burden

based)

based)

based)

outcome (Survey-

Interview (Survey-

Total per capita

Long-term nursing

home stay rate

cost (Claims

		• . – – .	O		
		Doniomin		The	
Aging Brain	Alzheimer's and	Benjamin	Caro	Integrated	Maximiz
Care (ABC)	Dementia Care	KOSE IIISTITUTE	Care	Memory	Independ

Domain

Management

Beneficiary QOL

Caregiver Support

Utilization

Per Capita

Long-Term

Nursing

Savings

Care Coordination and

IMPACT Collaboratory: Mission & Vision

- Vision: "To transform the delivery, quality, and outcomes of care...."
 - The GUIDE Model provides a large opportunity to improve services
 - Potential to extend GUIDE as a general service to all beneficiaries

- Mission: "To build the nation's capacity to conduct pragmatic clinical trials of interventions embedded within health care systems..."
 - GUIDE participating health systems may become "non-environments" for the conduct of ePCTs?



Health System Environments

- Included in the GUIDE Model:
 - Established Programs
 - New Programs
 - Extended new programs from "non-local" or "convener" TIN GUIDE participants
- Not included in the GUIDE Model
 - GUIDE Model applicants, not awarded participation
 - GUIDE Model applicants, awarded participation but not selecting participation
 - Ineligible for GUIDE: PACE, Hospice, Medicare Advantage, VHA, residential



Implications of GUIDE for ePCTs - 1

- Understand how the GUIDE Model requirements align with evidencebased comprehensive dementia care
 - Health systems where Established or New GUIDE sites exist will be adjusting services delivery to align with GUIDE requirements
 - ePCTs occurring now within these health systems will experience context change



Implications of GUIDE for ePCTs - 2

- Address new <u>challenges</u> and opportunities for pragmatic evaluation of dementia service delivery related to GUIDE-participating health systems
- Challenges:
 - Consider not starting new dementia ePCTs within GUIDE participants
 - If planning to conduct a dementia ePCT within a GUIDE participant, carefully determine how the intervention is additive to and not duplicative of GUIDE Model requirements.



Implications of GUIDE for ePCTs - 3

- Address new challenges and <u>opportunities</u> for pragmatic evaluation of dementia service delivery related to GUIDE-participating health systems
- Opportunities:
 - Consider specific "add-on" trials within GUIDE participating health systems
 - Social Isolation
 - Beneficiary without a caregiver
 - Cultural adaptations of evidence-based programs
 - Distinct from the CMS contracted evaluation of overall GUIDE, CMS does not have any prohibition against investigators conducting ePCTs related to aspects of the GUIDE intervention





Questions?

