



How a Center for Independent Living Provides FMS Services

The Natural Links between FMS, Independent Living and Consumer-Direction

We can be independent when we do it together!

www.mycil.org

About Northeast Pennsylvania Center for Independent Living (CIL)

- ▶ The Center for Independent Living is headquartered in Northeastern Pennsylvania where we have served people with disabilities since 1988.
- ▶ Promotes, supports and enhances living options for persons with disabilities and older adults so that they may remain in their home and community.
- ▶ Our effective network of resources, advocates, skills training, guidance and experience assist persons with disabilities gain their independence.
- ▶ Our core independent living services are:
 - ▶ Information and Referral
 - ▶ Skills training
 - ▶ Autism Programs
 - ▶ Peer Counseling
 - ▶ Advocacy
 - ▶ Service Coordination (becoming a separate entity in 2015)
 - ▶ Home modifications
 - ▶ Financial management services (FMS)- ACES\$
- ▶ We began providing FMS in 1995 and ACES\$ Financial Management Services was launched in 2001 as a subsidiary of the CIL.



Our Mission

To improve and enhance independent living options for persons with disabilities as well as those who are aging and want to live independently.

- ▶ We advocate for the elimination of architectural, attitudinal and communication barriers so that persons with disabilities and older adults can determine the services they receive and fully participate in society.
- ▶ As an organization that embraces the philosophy of self-determined services, we believe that individuals should have:
 - ▶ Freedom to plan an independent life with the supports they need
 - ▶ Authority to control their support dollars and responsibility for the use of those dollars
 - ▶ Support to live *and* be involved in the community in a way that suits their preferences
 - ▶ Responsibility to direct how and when supports and services are received



CIL/ACES\$ Staff and Board

As a CIL and an FMS provider, the opportunity and responsibility to recruit employees that are persons with disabilities and/or are Veterans is important to us. We view this not as a requirement for a contract but a requirement within our business model.

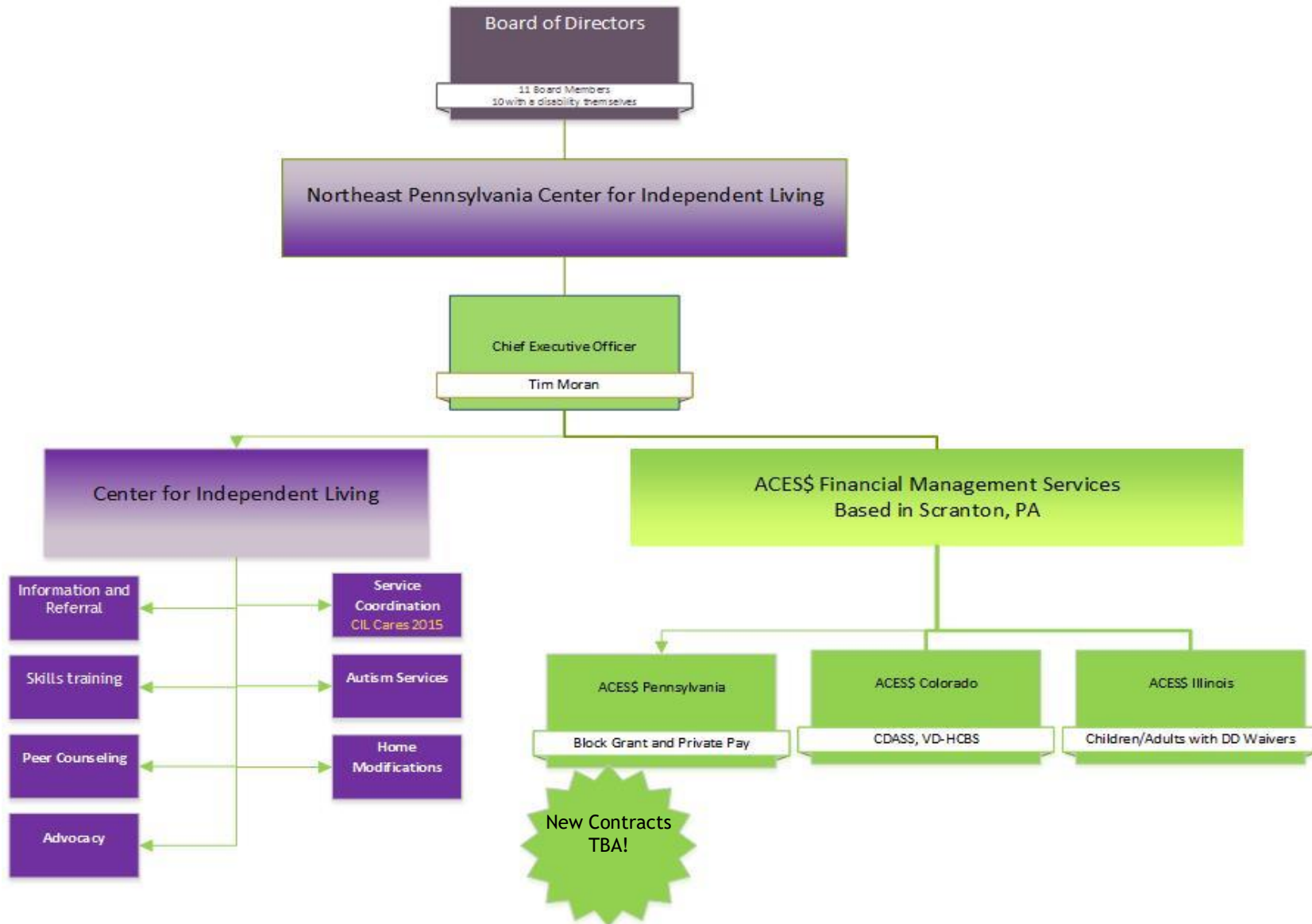
In addition:

- ▶ Some of our staff and board members actively use our services
- ▶ As a disability services organization, the majority of our employees (55%) have a disability
 - ▶ Ten percent (10%) of our FMS employees are Veterans
 - ▶ Fifteen percent (15%) of our employees either have a developmental disability or are the parent of a child with a developmental disability
- ▶ Our Board is comprised of 11 members, 10 of which have a disability themselves



CIL/ACCESS Organizational Structure

Northeast Pennsylvania Center for Independent Living



Service Provision and Conflict of Interest

- ▶ In response to the new HCBS ruling and State regulations regarding conflict of interest the CIL has created a new separate entity for Service Coordination
- ▶ All service coordination staff are now part of a new organization called CIL Cares which focuses strictly on person-centered care coordination that emphasizes the independent living philosophy
- ▶ CIL Cares launched September 1st!



ACES\$ FMS Provision, Consumer-Direction and the Linkage to HCBS

Programs that offer Participants the opportunity to select, hire, train and manage their own personal care workers and purchase their own program approved goods and services fully embrace the philosophy of self-direction, independent living, and community integration all of which are tenets of our CIL's mission!

- ▶ We began provision of FMS in 1995 as the trend was developing and have seen a huge expansion of this service and the level of individual control these programs are embracing

ACES\$ FMS Provision, Populations Served

Some of the populations we serve include:

- ▶ Older Adults
- ▶ I/DD Children and Adults
- ▶ Children with LTSS needs
- ▶ Individuals with Physical Disabilities
- ▶ Individuals with Brain Injury
- ▶ Veterans (VD-HCBS)

How the Independent Living Philosophy Impacts FMS Provision at ACES\$

As part of the CIL, ACES\$ has:

- ▶ Personal experience with intellectual, developmental, and physical disability concerns
- ▶ Expertise in Person-centered thinking and the model of Self-direction
- ▶ Staff with exceptional Financial Management Services (FMS) knowledge and skills that are cross-trained in independent living and self-direction
- ▶ A highly responsive customer service staff - we believe that we should be there for the people we serve
- ▶ State-of-the-art FMS timesheet and payroll processing technology to allow for more flexibility and monitoring by the individual of their budget, workers and timesheets
- ▶ Online goods and services portal for processing items on an Individual Service Plan to allow for better tracking
- ▶ Face-to-face enrollment and transitions
- ▶ Skills training and assistance on employer functions that are population/program oriented
- ▶ Accessible communications, website, materials and locations

Trained Staff

- ▶ All FMS staff are trained in on independent living, various disability populations, self-direction, program and population specific training
 - ▶ Enrollment Agents
 - ▶ Payroll
 - ▶ Tax
 - ▶ Accounts Payable
 - ▶ IT
- ▶ This translates to staff that provide superior customer service and enrollments because they understand the population they are serving, it's more than just paperwork and payroll
- ▶ Our in-house IT developers and programmers understand who we are designing systems for, and why, and how they will be utilized

Face-to-face Enrollments and Customer Service

- ▶ Enrollments can be performed in multiple ways based on the preference of the Participant
 - ▶ Face-to-face
 - ▶ Online
 - ▶ Mail/Fax
- ▶ Our **face-to-face enrollment** and training guarantees that paperwork is completed correctly the first time and that the rest of the process is swift, efficient and less overwhelming
- ▶ Complete and accurate enrollment paperwork streamlines the enrollment process



Flexible Methods for Timesheet Submission

- ▶ Participant choice of method for timesheet submission (online, email, mail or fax) all of which are secure and verifiable
- ▶ Supplemental payroll
- ▶ Our online timesheets are in real time. This enables Participants to submit their Attendant's hours and, if filled out with the correct information, we are able to process them instantly. For those timesheets that are submitted via mail/fax we are able to process them within 24 hours.

Robust Online Systems Enabling Greater Consumer Control

- ▶ Automatically rejects overlapping timesheets, notifies Participants instantly if they are over-budget, and allows them to monitor their budgets in real time.
- ▶ Enables our staff to spend more time helping Participants one-on-one.
- ▶ Enables us to provide a high value experience for our Participants and their Attendants as well as more focused one-on-one attention for those that need it with less staffing.
- ▶ PAID and NOTE offer REAL TIME:
 - ▶ Online budget and expenditure tracking and reporting
 - ▶ Timesheet oversight and submission- including review of historic information
 - ▶ Online goods and service expenditure tracking, submission and reporting for approved items on service plans
- ▶ PRM: PAID Resource Management is an internally developed CRM system that allows for the tracking of all calls/communications with clients and their attendants.

Goods and Services

- ▶ ACES\$ has recently added an online goods and services management portal to PAID
- ▶ This allows Participants to view and track budget information, savings (if allowed by the program, such as VD-HCBS) and expenditures in real time.
- ▶ Expenses can be submitted online, including the uploading of receipts and invoices to the system for reimbursement
- ▶ Fraud and Abuse Measures: We have implemented safeguards such as:
 - ▶ Only allowing reimbursement submissions of expenses listed on service plans
 - ▶ Cost thresholds (i.e. exceeding 15% over estimated cost or sending alerts for high cost items to case managers prompting a confirmation that the item was delivered and as per plan requirements prior to reimbursement)
 - ▶ Vendor confirmation and identification
- ▶ All receipts/invoices are verified against the approved plan prior to reimbursement

Logistics of ACTUALLY Providing Services

- ▶ We have multiple departments that have specific functions, highly trained staff and checks and balances that include:
 - ▶ Tax
 - ▶ Payroll
 - ▶ Accounting (Accounts Payable)
 - ▶ Customer Service
 - ▶ Enrollment
 - ▶ IT
- ▶ Technology: Many contracts require customizations of reporting, tracking and online systems.
 - ▶ High Expenses for customizations done by sub-contracts and very short program requirement timelines.
 - ▶ In-house IT development streamlines process and makes modifications more cost-effective.

Logistics of ACTUALLY Providing Services (continued)

- ▶ Business Continuity: We have a detailed plan that outlines disaster recovery measures, information storage and backups.
- ▶ Insurance: Most contracts require significant vendor liability insurance and other insurances
- ▶ Unencumbered reserves: A best practice is to have a minimum of two (2) months worth of payroll expenses as a reserve. For example, states with budget approval delays may not be billed for some time. Most employees can not wait weeks or months to get paid, and participants depend on their employees
- ▶ Separation from conflict of interest

Federal Level Regulation Impacts

- ▶ Understanding and knowing the impacts of Department of Labor Home Care Rule's interpretation of the Fair Labor Standards Act (FLSA)
 - ▶ We **MUST** be up-to-date on all regulations and pending changes because of the drastic impact it has on the people we serve. Impacts on data collection, online systems, and enrollment forms
 - ▶ Overtime ruling may impact how we record data and who can be employed as a worker, depending on program interpretations. Knowing overtime was in flux, we have kept our internal systems and forms flexible to accommodate the rule change, should that happen

Monitoring and Oversight - Prevention of Fraud and Abuse

▶ Online System

- ▶ Budgets are based on service plan authorizations and are not active until the authorization is approved.
- ▶ Participants that are no longer active (no longer authorized to receive services) can not submit timesheets.
- ▶ Our system automatically rejects timesheets that are over budget and/or over hours, depending on program rules. Time sheets must be corrected before they can be resubmitted for payment.
- ▶ Timesheets can only be submitted for employees that are active in the system with all background checks passed and qualifications met.
- ▶ Timesheets must be reviewed and approved by both employer and employee to further ensure hours and services are correctly documented.
- ▶ Goods and services are only reimbursed for authorized items.

Monitoring and Oversight - Prevention of Fraud and Abuse (continued)

▶ Reporting

- ▶ Reports are available through hard-copy, online and electronic formats (PDF/Excel)
- ▶ User/role based authorization
- ▶ Customized reports, including monthly budget utilization and expenditure reports, which are sent to the participant or viewable in real-time on our online system
- ▶ Contracting Department level reports - program/participant utilization and employee reports, fraud and abuse reporting
- ▶ Case manager level reports

▶ Quality Assurance/Quality Initiatives (QA/QI)

- ▶ Accountability structure
- ▶ Technology to support QA/QI
- ▶ Policies and procedures for internal controls (performance standards, quality indicators and monitoring activities)

Valuable Partnerships



▶ Ankissam- Internal Audit and Blue Print

- ▶ We have worked with Ankissam and Mollie Murphy to audit our internal FMS processes and online systems to ensure compliance with Federal Regulations and best practices. We have also developed a customized policy and procedure manual, using F/EA Blueprint, a tool developed by Ankissam. We have based the content on our internal policy and procedure document and continually make updates to reflect changes in our system and processes.



▶ QuickMatch- Attendant Registry

- ▶ We have developed a relationship with QuickMatch, a CIL-developed Attendant search software that matches participants with an employee suiting their needs and preferences. We are able to integrate this into our system, if and when, a state sees the need.

The 4 “Ts” = The ACES\$ Advantage

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RANSITION
RANSPARENCY
ECHNOLOGY
OUCH

QUESTIONS ?



Questions or interested in how we may serve you?

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