



# Department of Health & Human Services

## Bureau of Developmental Services Current State Analysis

# Lean Focus

A current state assessment of operational process will be performed with team members of the Bureau of Developmental Services and Area Agencies

The primary focus of the lean assessment will be to map procedures from **Intake** through **MMIS Billing**. Significant efforts are currently required and performed by BDS and Area Agency staff as they accomplish tasks directly related to providing services to NH Citizens with Developmental Disabilities and/or Acquired Brain Disorders.

# Team Members

## Sponsors

Sandy Hunt

Interim Director, Bureau of Developmental Disabilities

Donna O’Leary

DHHS, CIO

## Core Team

Reba Aznive

Prior Authorization

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Regional Liaison, Wait List

Sharyn Goddard

Lean Facilitator

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## Caucus Team

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Area Agency Region 3, Intake

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Area Agency Region 3, Information Technology

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Area Agency Region 9, Information Technology

Kristina Ickes

Administrator

Christine Philipson

Community Support Network, Inc.

# Overview

The Bureau of Developmental Services (BDS) maintains, implements and coordinates a comprehensive service delivery system for developmentally disabled persons per NH RSA 171-A Services for the Developmentally Disabled (see Appendix for the list of pertaining NH Statutes & Rules).

## **Developmental Disability & Acquired Brain Disorder Services:**

- **Area Agencies (AA)** provide services through a system of 10 non-profit 501 (c)(3), regional organizations.

Area Agencies act as the lead to plan, provide, coordinate and oversee services, and exercises local control through independent Boards of Directors

Area Agencies provide services directly and/or through a subcontract agency

- **BDS** contracts annually with Area Agencies

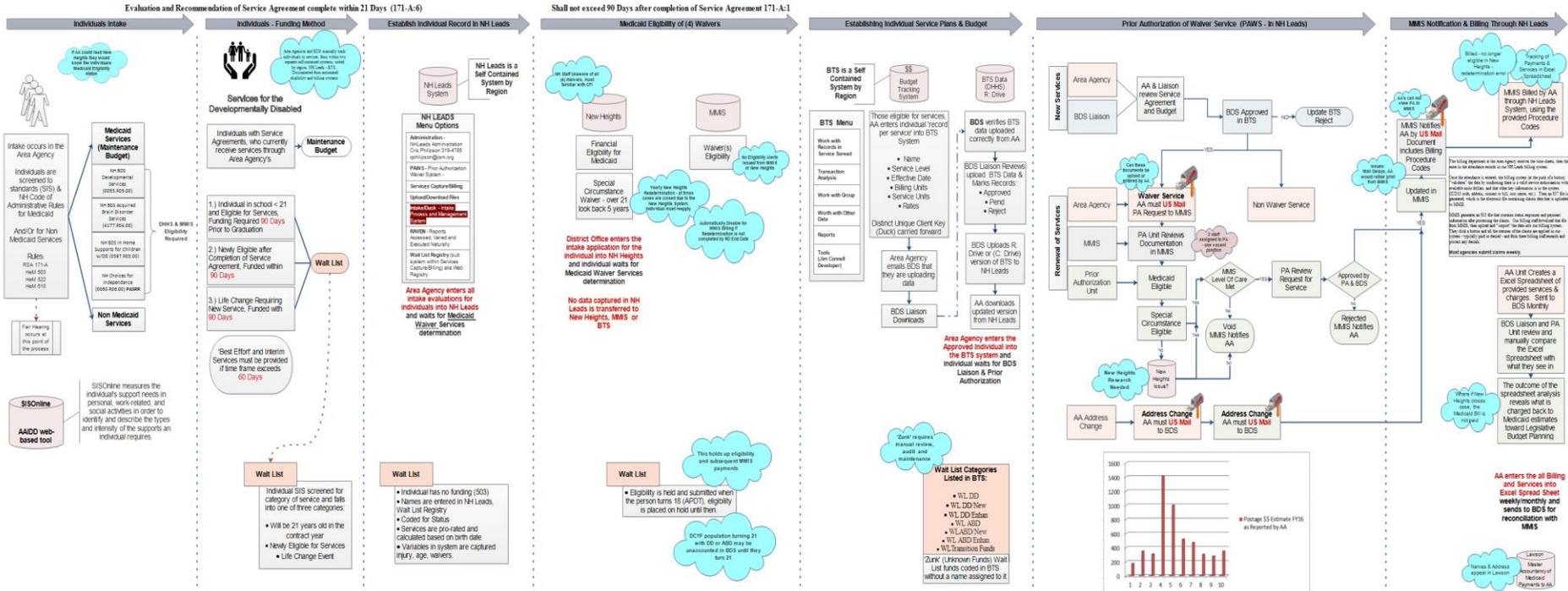
BDS has a public/private partnership with local, non-profit Agencies

- **Community Support Network, Inc.** serves as a central business and service organization for the 10 Area Agencies

CSNI accomplishes its services and activities through its staff members, board committees, and project directed work groups which consist of: Executive, Legislative, Managed Care, Centralized Training, Quality Improvement, and Supports Intensity Scale (SIS).



NH Department of Health & Human Services  
Bureau of Developmental Services  
Services for NH Citizens with Developmental Disabilities and/or Acquired Brain Disorders



**DEMOGRAPHIC**

SERVICES FOR DEVELOPMENTAL DISABILITIES AND ACQUIRED BRAIN DISORDERS

INDIVIDUALS OVER 21 YEARS OR UNDER 3 YEARS OF AGE

90% MEDICAID

FINANCIAL ELIGIBILITY REQUIRED, DHS DISTRICT OFFICES

MEDICAL ELIGIBILITY REQUIRED, MMS

SERVICES FUNDED BY LEGISLATIVE BUDGET LINE ITEM

FUNDS ASSIGNED TO REGIONAL AREA AGENCIES BY BUREAU OF DEVELOPMENTAL SERVICES CALCULATION

SERVICES PROVIDED BY AREA AGENCY OR BY SUB-CONTRACTED SERVICE PROVIDERS

OPTION AVAILABLE TO SELF-DIRECTED SERVICES (PDMs)

PRIOR AUTHORIZATIONS ARE CAPPED OFF

SERVICES TRACKING WITHIN BUDGET TRACKING SYSTEM (BTS)

PAYMENTS FOR SERVICES MANAGED THROUGH MMS SYSTEM

IN HOME SUPPORTS BIRTH TO 21

**AREA AGENCY'S**

Non-profit 501 (c) (3) Organizations

Northern Human Services  
Pathways of the River Valley  
Lakes Region Community Services  
Community Bridges  
Monadnock Developmental Services  
Gateway Community Services  
Moore Center Services  
One Sky Community Services  
Community Partners  
Community Crossroads

DETERMINE THE INDIVIDUAL'S NEEDS & DEVELOP SERVICE PLAN (21 DAYS) 171-A-6

WRITTEN INDIVIDUAL SERVICE AGREEMENT (14 DAYS) 171-A-12

ASSIST WITH SELF-DIRECTED SERVICES, PARTICIPANT DIRECTED AND MANAGED SERVICES (M 52)

ENTER ALL INDIVIDUALS AND SERVICE PLANS INTO NH LEADS & BUDGET TRACKING SYSTEM (BTS)

PROVIDE SERVICES, OR PLAN FOR CONTRACTED SERVICES (90 Days)

MONITOR SERVICES - ANNUAL PERIODIC REVIEW (171-A-11)

ALL UTILIZE DIFFERENT BUSINESS PROCEDURES

INDEPENDENT UNIQUE BILLING SYSTEMS

AREA AGENCIES BILL MEDICAID IN NH LEADS

INDIVIDUAL AREA AGENCIES OFFER NO BREAKOUT FOR MAINTENANCE OR WAIT LIST CHARGES

CREATION OF THE 'WAIT LIST FOR FUTURE SERVICES

**BUREAU OF DEVELOPMENTAL SERVICES**

300 W. 4th St. Concord, NH 03301  
603.271.2200  
603.271.2200  
603.271.2200

MAINTENANCE AND WAIT LIST BUDGET ANALYSIS AND REASSIGNING ALLOCATE LEGISLATIVE FUNDED DOLLARS TO (3) AREA AGENCIES

LIASONS ASSIGNED AREA AGENCIES

LIASONS ARE A SECOND SET OF EYES TO EACH INDIVIDUAL PLAN AND APPROVE PRIOR AUTHORIZATIONS

MANAGE AND MONITOR AREA BUDGET WITHIN BTS

MAINTENANCE BUDGET SPEND DOLLARS TO WAIT LIST FUNDS ARE COLLECTED

BUDGET SERVICE PLAN MODIFICATIONS AND REALLOCATION OF FUNDS BETWEEN INDIVIDUALS WITHIN THE AREA AGENCY

FASE/CONTACT & CONFERENCE

AREA AGENCY SITE VISITS

EXERCISE WAIVER REQUEST WITH LEGAL ADMINISTRATIVE RULES

QUALITY ASSURANCE/INETS

COMMITTEES - FEDERAL ACCOUNTABILITY

REORGANIZATION OF AREA AGENCIES

ON-SITE SUPPORTS: TRAVEL, TRAINING

SUBSIDIES - BUDGET MANAGEMENT OF BTS

CHILDSERVICES - QUALITY LEADERSHIP

RELIEF BUDGETING - FINANCIAL

MEDICAID COMPLIANCE

**Interagency Collaboration**

Community Support Network, Inc. (CSNI) <http://www.csni.org>  
not-for-profit organization that works in support of the NH Area Agencies

New Hampshire Council on Developmental Disabilities

(10) Regional Area Agencies, and their Board of Directors

Bureau of Developmental Services, Agency Liaisons

Bureau of Developmental Services, Prior Authorization Unit

Bureau of Developmental Services, Administrative Rules

Bureau of Developmental Services, Client and Legal Services

New Heights, MMS Systems, NH Leads, BTS Database, Liaison

NH Revised Statuses Annotated (MFRSA)

NH Code of Administrative Rules (H-6)

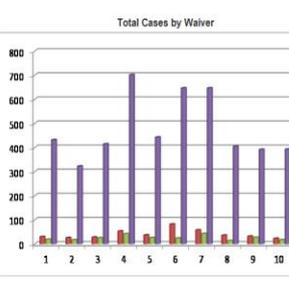
Managed Care - Oversight by MCO. Future, no date set at this time

Wait List Oversight

- BDS Allocates VL Funds to Regions
- BDS over sees the global planning for Wait List Funds
- VL Funds are Announced for future projections
- BDS Liaisons review and suggest reallocation within AA
- Projected VL Funds initiate Legislature Budget
- Legislature Funds the VL Budget
- From that budget AA - BDS Contract Created yearly

Sentinel Event Reporting, Review and Documented by DHS when preceding 30 days

A sentinel event is an unexpected occurrence involving the death or serious physical or psychological injury, or risk thereof, signaling the need for immediate investigation and response, or other serious event.



Eligibility Occurs In:	Name Entered Monthly into System:	Definitions:
Area Agency, Helms	NH Leads	AA
DHS District Office	New Heights System	AA&OD
BTS, by BDS Liaison	Budget Tracking System	BDS
BDS Prior Authorization	MMS	CSNI
Medical Authorization		Developmental Disabilities District Unique Client Key
		D-CLK
		H-6M
		MMS
		NH-CC
		NH Inter Agency Coordinating Rules
		NH Revised Statuses Annotated
		NHSA On The Waiver
		PA
		Prior Authorization
		Supports Intensity Scale
		Wait List
		Wait List Funds in BTS without an individuals name
		Z.N.K.



Individuals Intake

Intake occurs in the Area Agency

Individuals are screened to standards (SIS) & NH Code of Administrative Rules for Medicaid

And/Or for Non Medicaid Services

Rules:  
 RSA 171-A  
 HeM 503  
 HeM 522  
 HeM 510

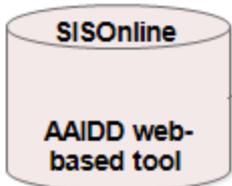
Fair Hearing occurs at this point of the process

- Medicaid Services (Maintenance Budget)**
- NH BDS Developmental Services (0053.R05.00)
- NH BDS Acquired Brain Disorder Services (4177.R04.00)
- NH BDS In Home Supports for Children w/DD (0397.R03.00)
- NH Choices for Independence (0060.R06.00) PASRR

DHHS & MMIS Eligibility Required

**Non Medicaid Services**

If Area Agencies could read New Heights they would know the individuals Medicaid Eligibility status



SISOnline measures the individual's support needs in personal, work-related, and social activities in order to identify and describe the types and intensity of the supports an individual requires.



## Services for the Developmentally Disabled

Individuals with Service Agreements, who currently receive services through Area Agency's

**Maintenance Budget**

1.) Individual in school < 21 and Eligible for Services, Funding Required **90 Days** Prior to Graduation

2.) Newly Eligible after Completion of Service Agreement, Funded within **90 Days**

3.) Life Change Requiring New Service, Funded with **90 Days**

**Wait List**

'Best Effort' and Interim Services must be provided if time frame exceeds **60 Days**

## Individuals - Funding Method

Area Agencies and BDS manually track individuals to services, from within two separate self contained systems, sorted by region. NH Leads - BTS. Disconnected from automated eligibility and billing systems

**Wait List**

Individual SIS screened for category of service and falls into one of three categories:

- Will be 21 years old in the contract year
- Newly Eligible for Services
  - Life Change Event



**NH Leads is a Self Contained System by Region**

<b>NH LEADS Menu Options</b>
<b>Administration -</b> NHLeads Administration Cris Philipson 319-4785 cphilipson@csni.org
<b>PAWS - Prior Authorization Waiver System -</b>
<b>Services Capture/Billing</b>
<b>Upload/Download Files</b>
<b>Intake/Duck - Intake Process and Management System</b>
<b>RAVEN - Reports Accessed, Varied and Executed Naturally</b>
<b>Wait List Registry (sub system within Services Capture/Billing) aka Web Registry</b>

**Consumer Main Form**

DUCK: 11128294 AA: 5

Prefix:

\*First:

Middle:

\*Last:

Suffix:

\*DOB:

TIN(SSN):

Medicaid ID:

Citizenship Status:

Primary Language:

Residence Type:

Race:

\*Gender:  Male  Female

37 intake screens in total. “Many regions use very few of the screens, some use more – there is no requirement that they enter all the data.” Christine Philipson

Data collected statewide includes what you have above, then:

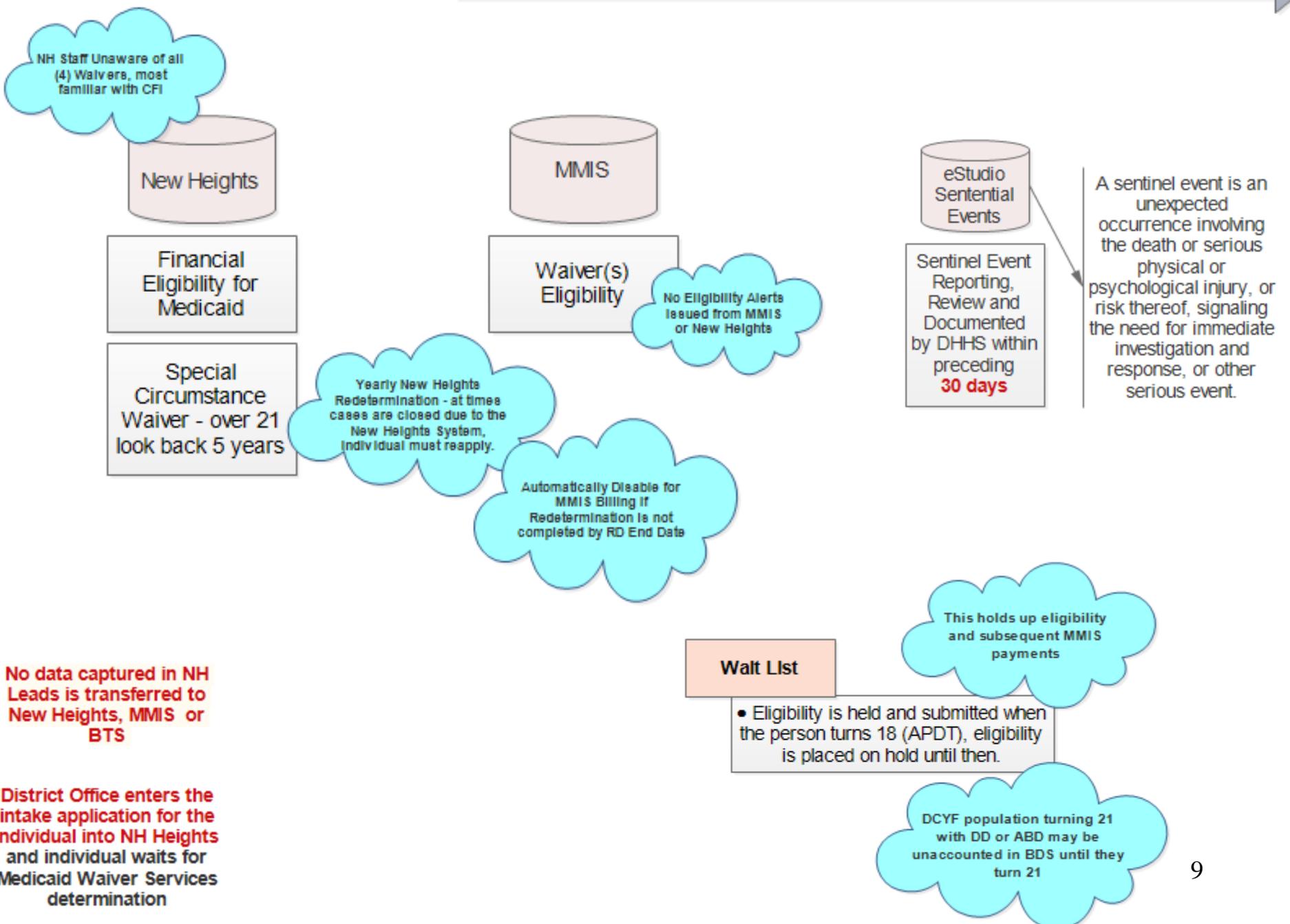
- Address
- ICD code
- Billing release information

**Wait List**

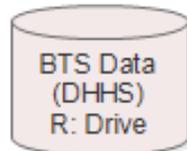
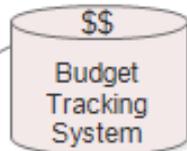
- Individual has no funding (503)
- Names are entered in NH Leads, Wait List Registry
- Coded for Status
- Services are pro-rated and calculated based on birth date
- Variables in system are captured injury, age, waivers.

**Area Agency enters all intake evaluations for individuals into NH Leads and waits for Medicaid Waiver Services determination**

# Medicaid Eligibility of (4) Waivers



**BTS is a Self Contained System by Region**



**BTS Menu**

- Work with Records in Service Soread
- Transaction Analysis
- Work with Group
- Worth with Other Data
- Reports
- Tools (Jim Connell Developer)

Those eligible for services, AA enters individual 'record per service' into BTS System

- Name
- Service Level
- Effective Date
- Billing Units
- Service Units
- Rates

Distinct Unique Client Key (Duck) carried forward

Area Agency emails BDS that they are uploading data

BDS Liaison Downloads

BDS verifies BTS data uploaded correctly from AA

BDS Liaison Reviews upload BTS Data & Marks Records:

- Approved
- Pend
- Reject

BDS Uploads R: Drive or (C: Drive) version of BTS to NH Leads

AA downloads updated version from NH Leads

**Wait List Oversight**

- BDS Allocates WL Funds to Regions
- BDS over sees the global planning for Wait List Funds
- WL Funds are Annualized for future projections
- BDS Liaisons review and suggest reallocation within AA
- Projected WL Funds initiate Legislature Budget
- Legislature Funds the WL Budget
- From that budget, AA - BDS Contract Created Yearly

'Zunk' requires manual review, audit and maintenance

**Wait List Categories Listed in BTS:**

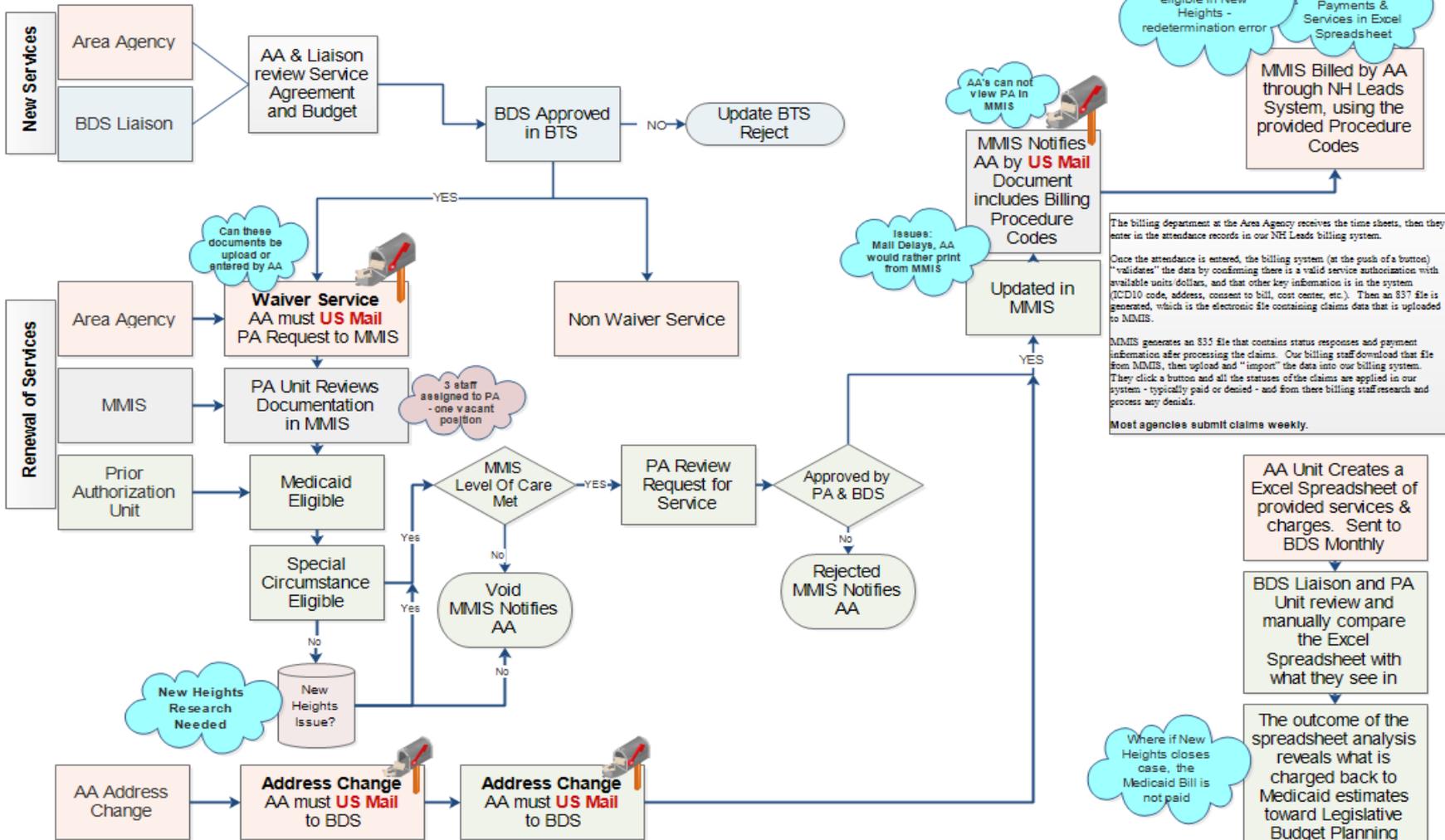
- WL DD
- WL DD/New
- WL DD/Enhan
- WL ABD
- WLABD/New
- WL ABD/Enhan
- WL Transition Funds

'Zunk' (Unknown Funds) Wait List funds coded in BTS without a name assigned to it

**Area Agency enters the Approved Individual into the BTS system and individual waits for BDS Liaison & Prior Authorization**

Prior Authorization of Waiver Service (PAWS - In NH Leads)

MMIS Notification & Billing Through NH Leads



Billed - no longer eligible in New Heights - redetermination error

Tracking of Payments & Services in Excel Spreadsheet

AA's can not view PA in MMIS

Can these documents be upload or entered by AA

Issues: Mail Delays, AA would rather print from MMIS

3 staff assigned to PA - one vacant position

New Heights Research Needed

Where if New Heights closes case, the Medicaid Bill is not paid

Names & Address appear in Lawson

Lawson Master Accountancy of Medicaid Payments to AA

The billing department at the Area Agency receives the time sheets, then they enter in the attendance records in our NH Leads billing system.

Once the attendance is entered, the billing system (at the push of a button) "validates" the data by confirming there is a valid service authorization with available units (dollars, and that other key information is in the system (ICD10 code, address, consent to bill, cost center, etc.). Then an 837 file is generated, which is the electronic file containing claims data that is uploaded to MMIS.

MMIS generates an 835 file that contains status responses and payment information after processing the claims. Our billing staff download that file from MMIS, then upload and "import" the data into our billing system. They click a button and all the statuses of the claims are applied in our system - typically paid or denied - and from there billing staff research and process any denials.

Most agencies submit claims weekly.

AA Unit Creates a Excel Spreadsheet of provided services & charges. Sent to BDS Monthly

BDS Liaison and PA Unit review and manually compare the Excel Spreadsheet with what they see in

The outcome of the spreadsheet analysis reveals what is charged back to Medicaid estimates toward Legislative Budget Planning

AA enters the all Billing and Services into Excel Spread Sheet weekly/monthly and sends to BDS for reconciliation with MMIS

#	Deficiency Area	Current Standing	Strategic Objective	Proposed Action
1	Overall Process	Data is manually entered into (4) systems; NH Leads, New Heights, BTS and MMIS. Spreadsheets are also created to control process	Clean Data	Explore feeding demographic data between New Heights, NH Leads, MMIS & BTS (date match on which set of data is most recent.)
2	Overall Process	No formal Procedures Manual	Documentation	Build an Index from topics in this project to create a BDS Procedures Manual
3	Overall Process	Individual Tracking occurs in 4 systems	Master Client Record across systems	Seek alternative IT solution
4	Medicaid Eligibility of Waivers	Area Agencies are unable to view New Heights Eligibility Determination and/or Case Status	Transparency, Save Time	Attain views into New Heights for Area Agencies
5	Medicaid Eligibility of Waivers	New Heights & MMIS Eligibility and Procedure Codes are not passed into the NH Leads & Budget Tracking System	Automation – faster decision making and turn around	Explore passing eligibility data from New Heights into NH Leads & BTS ( <b>see note from CSNI</b> )
6	Medicaid Eligibility of Waivers	New Heights System challenges with components required to determine 1915c Waivers	Automation – faster decision making and turn around	Seek alternative IT solution
7	Medicaid Eligibility of Waivers	Generalist New Heights case workers have limited awareness/training with Waivers (1915C)	Training	Procedures Manual on Waivers
8	Medicaid Eligibility of Waivers	No Alert System when eligibility is established	Automation – faster decision making and turn around	Seek alternative IT solution
9	Medicaid Eligibility of Waivers	Eligibility is not standardly processed on under the age of 18 Waitlist Individuals	Automation – faster decision making and turn around	Procedure Change
10	Establishing Service Plan & Budget	Upload/Download of data moved between NH Leads, DHHS R: Drive and Area Agencies is not automated	Automation	Explore automated data transfer methods for BTS
11	Establishing Service Plan & Budget	NH Leads & Budget Tracking System are self contained systems	Breakdown the silos	Seek alternative IT solution
12	Prior Authorization of Waiver Services	Area Agencies must send (U.S. mail) in waiver request to MMIS	Save Postage \$\$\$, Save Time	Find solutions to mailing documents into MMIS
13	Prior Authorization of Waiver Services	No Feed of PA downstream to NH Leads & BTS	Automation – quicker decision making	Explore modification to NH Leads & BTS to allow for prior authorization data feed from MMIS
14	Overall Process	Staffing/Vacancy	Increase processing volume	Hire / Train
15	Prior Authorization of Waiver Services	Limited access to run MMIS query reports	Transparency	Explore Ad Hoc reporting possibilities within MMIS
16	MMIS Notification & Billing	MMIS notifies Area Agencies through U.S. mail, which contains Service Eligibility & Billing Procedure Codes	Save Postage \$\$\$, Save Time	Find solutions to MMIS mailing documents to Area Agency's
17	MMIS Notification & Billing	New Heights Redetermination timing can closes cases, MMIS billing rejected	Transparency	Seek alternative IT solution
18	Overall Process	No Procedure Change Control Mechanism	Clear Communication, understanding	Create a change procedure documentation for controls
19	Overall Process	No central web site for laws, process, information and training	Clear Communication, understanding	Explore potential for web page - external access critical
20	Overall Process	DCYF clients turning 21 may need DD or ABD, currently not on the BDS / AA Radar	Automation, faster decision making and turn around	Seek alternative IT solution
21	Overall Process	Can NH Easy offer this system / method any relief (like the CFI solution)	Automation, faster decision making and turn around	Seek alternative IT solution
22	Prior Authorization of Waiver Services	Address change, mailed to BDS then sent onto MMIS to update record	Save Postage \$\$\$, Save Time	Seek alternative IT solution

**NOTE:** From Christine Philipson, **CSNI NH LEADS**. We are currently undergoing a system upgrade. At the moment, we are simply bringing the application up to a modern coding platform and dealing with web browser compatibility issues and performance (no real structural changes to the application). Once this is done, we are looking into a Phase II development where we may add features and functionality. We are embarking on gathering specifications now for that phase. **So, it is very timely that you ask about adding new fields and integration!**



To close the loop for each individual within this process every record is manually entered into (4) self-contained systems (silos)

NH Leads  
Budget Tracking System  
New Heights  
MMIS &  
Various Control Spreadsheets

Vacant and/or unfunded positions and staff leave time



Need for Future System Development & Synergy

Waiting for U.S Post Office to deliver

1. Mailed Submission of Prior Authorizations to MMIS
2. Subsequent return mail of Service Codes required to bill MMIS
3. Individual Change of Address

These processes depend on the U.S Post Office

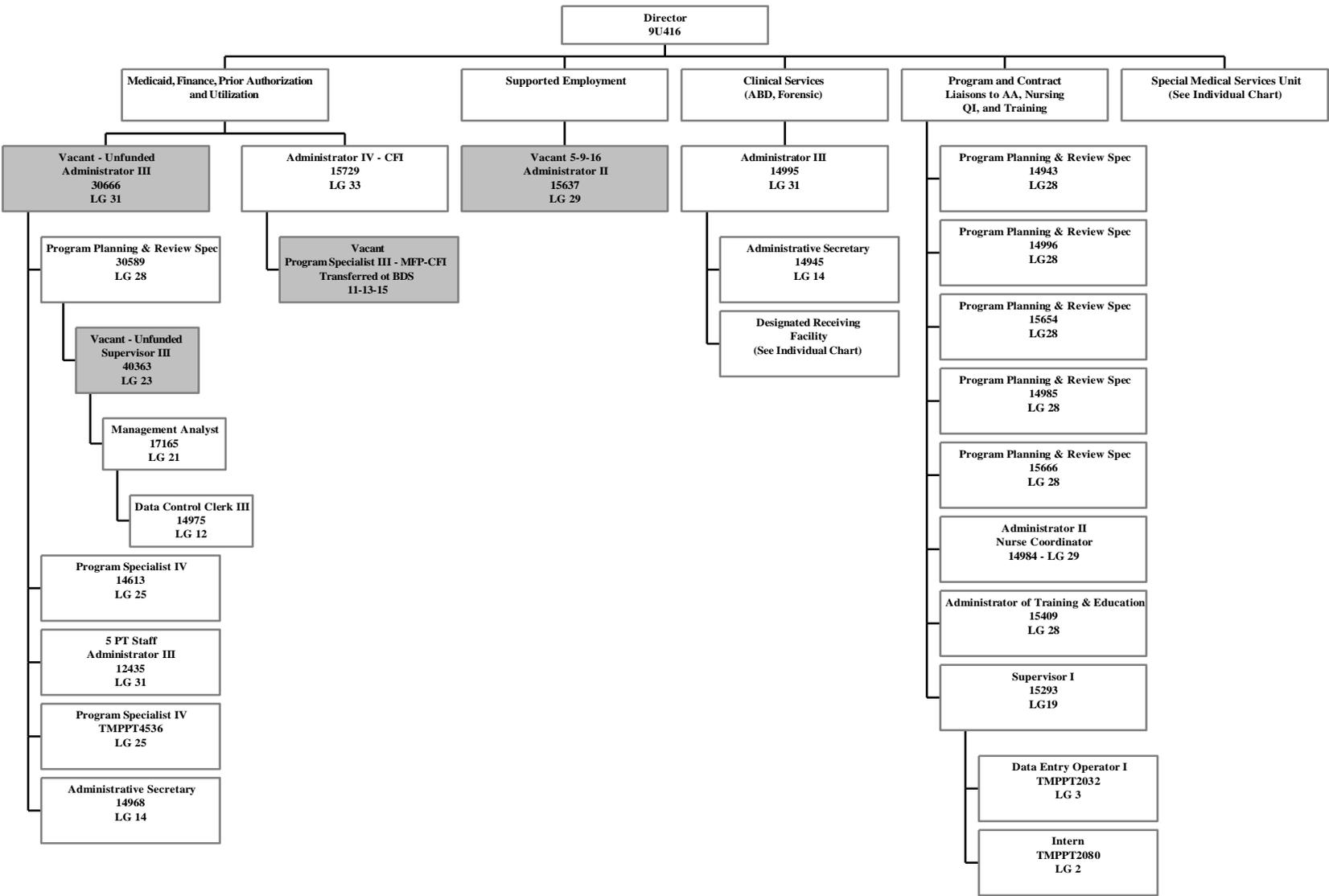
Area Agency's are not able to view New Heights eligibility status

# Appendix A - Definitions

AA	<b>Area Agency</b>
AAIDD	<b>American Association on Intellectual and Developmental Disabilities</b>
ABD	<b>Acquired Brain Disorders</b>
BDS	<b>Bureau of Development Service</b>
BTS	<b>Budget Tracking System</b>
CSNI	<b>Community Support Network, Inc.</b>
DD	<b>Developmental Disabilities</b>
DUCK	<b>Distinct Unique Client Key</b>
He-M	<b>NH Code of Administrative Rules</b>
HRST	<b>Health Risk Screening Tool</b>
.IHS	<b>In Home Support</b>
MMIS	<b>Medicaid Management System</b>
NCI	<b>National Core Indicators, Quality of Life Survey</b>
NHICC	<b>NH Inter Agency Coordinating Council</b>
NHRSA	<b>NH Revised Statutes Annotated</b>
ODESA	<b>HRST, Data Transfer Method</b>
On The Waiver	<b>HeM, AA, Medicaid, PA Eligible, able to Bill Medicaid</b>
PA	<b>Prior Authorization</b>
SIS	<b>Supports Intensity Scale, Standard Screening Tool</b>
WL	<b>Wait List</b>
ZUNK	<b>Wait List Funds in BTS without an individuals name</b>

# Appendix B - Organizational Chart

## Bureau of Developmental Services



# Appendix C – NH Statutes and Rules

**NHRSA 171-A** SERVICES FOR THE DEVELOPMENTALLY DISABLED

**He-M 202** - RIGHTS PROTECTION PROCEDURES FOR DEVELOPMENTAL SERVICES

**He-M 310** - RIGHTS OF PERSONS RECEIVING DEVELOPMENTAL SERVICES OR ACQUIRED BRAIN DISORDER SERVICES IN THE COMMUNITY

**He-M 502** - RECORDS STANDARDS FOR INDIVIDUALS SERVED DEVELOPMENTAL SERVICES

**He-M 503** - ELIGIBILITY AND THE PROCESS OF PROVIDING SERVICES

**He-M 505** - ESTABLISHMENT AND OPERATION OF AREA AGENCIES

**He-M 507** - COMMUNITY PARTICIPATION SERVICES

**He-M 517** - MEDICAID-COVERED HOME AND COMMUNITY-BASED CARE SERVICES FOR PERSONS WITH DEVELOPMENTAL DISABILITIES

**He-M 518** - EMPLOYMENT SERVICES

**He-M 521** - CERTIFICATION OF RESIDENTIAL OR COMBINED RESIDENTIAL AND DAY SERVICES PROVIDED IN THE FAMILY HOME

**He-M 522** - ELIGIBILITY DETERMINATION AND SERVICE PLANNING FOR INDIVIDUALS WITH AN ACQUIRED BRAIN DISORDER

**He-M 524** - IN-HOME SUPPORTS

**He-M 525** - PARTICIPANT DIRECTED AND MANAGED SERVICES

**He-M 1001** - CERTIFICATION STANDARDS FOR COMMUNITY RESIDENCES

**He-M 1201** - ADMINISTRATION OF MEDICATIONS

**He-M 1301** - MEDICAL ASSISTANCE SERVICES PROVIDED BY EDUCATION AGENCIES

CLIENT LEGAL SERVICES MAY PROVIDE ADMINISTRATIVE WAIVER ON ANY OF THE ABOVE RULES

# Appendix D – NH Waiver Factsheet

## **NH BDS Developmental Services (0053.R05.00)**

Provides day services, residential hab/personal care, respite, service coordination, supported employment, assistive technology support, community support, crisis response, environmental and vehicle mods, participant directed and managed services, specialty services for individuals w/autism, DD and ID from 0 - no max age

## **NH BDS Acquired Brain Disorder Services (4177.R04.00)**

Provides day services, respite, service coordination, supported employment, assistive technology support, community support, crisis response, environmental and vehicle mod, participant directed and managed services, residential hab/personal care, specialty services for individuals w/brain injury ages 22 - no max age

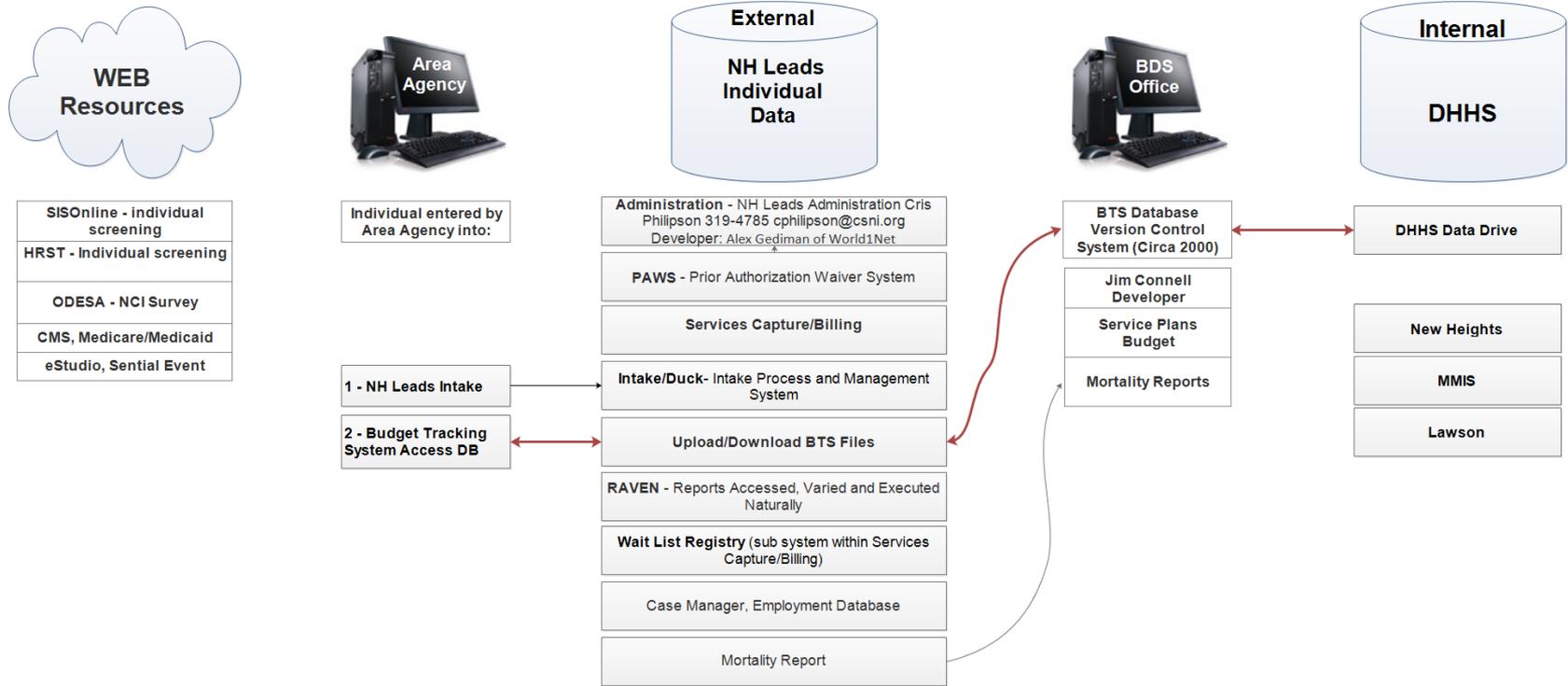
## **NH In Home Supports for Children w/DD (0397.R03.00)**

Provides enhanced personal care, consultations, environmental and vehicle mods, family support/service coordination, respite care for individuals w/autism, ID, DD ages 0-21

## **NH Choices for Independence (0060.R06.00)**

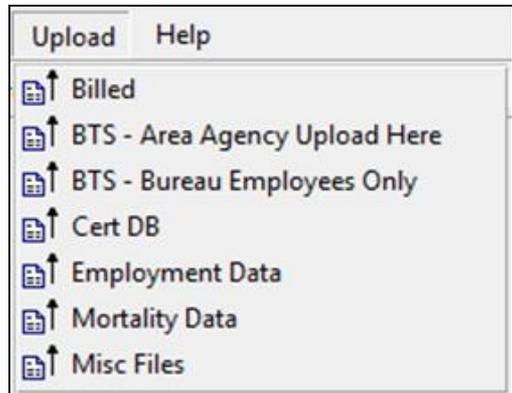
Provides adult medical day, home health aide, homemaker, personal care, respite, adult family care, adult in-home services, community transition, consolidated services, environmental accessibility, home-delivered meals, non-medical transportation, PERS, residential care facility, skilled nursing, specialized medical equipment, supportive housing services for aged individuals 65 yrs. -no max age, physical and other disabilities ages 18-64 yrs.

# Appendix E – Individual Data Flow



**Unknown condition of NH Leads:**

- Encryption of BTS data transfer
- Backup of Individual Data
- Security of Individual Data
- Firewalls



# Appendix F – BDS Budget Allocation Factors

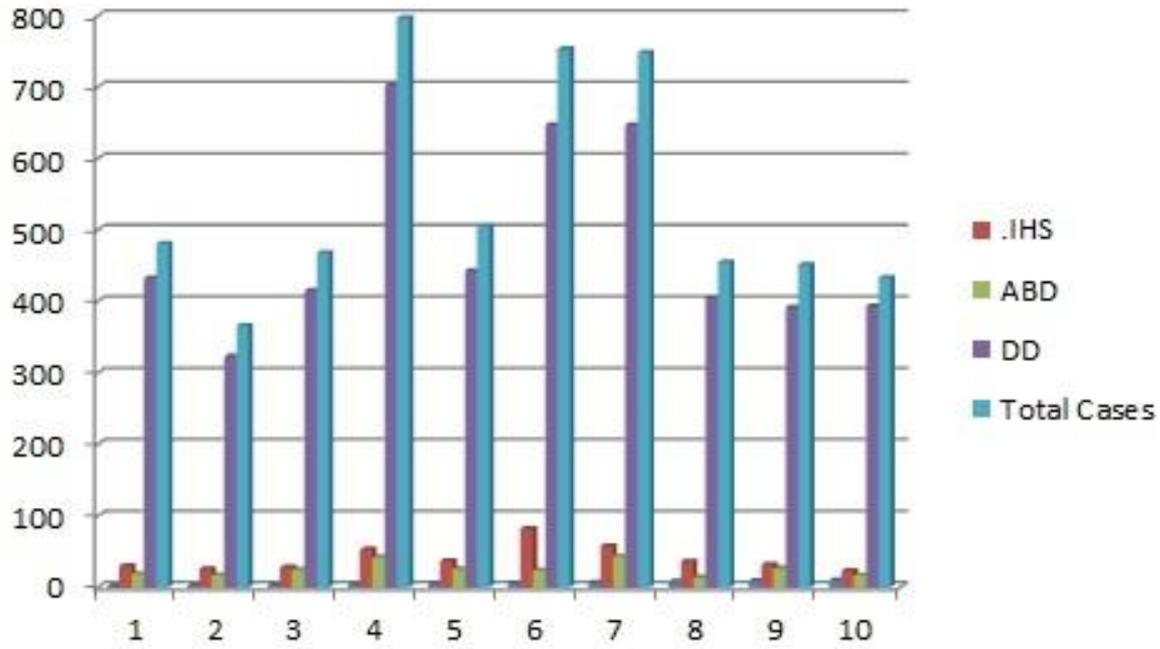
1. Agency Qualifications
2. Factors determining Area Agency allocation of budget funds
  - i. Population of the Geographical Region
  - ii. Individuals working while receiving services
  - iii. HeM 525 Participant Directed and Managed Services  
Individual/Family Control

# Appendix G

## June 2016 Service Authorizations for DD, ABD, and IHS Waivers Services Data from NH Leads

### Area Agencies

- 1) Northern Human Services
- 2) Pathways of the River Valley
- 3) Lakes Region Community Services
- 4) Community Bridges
- 5) Monadnock Developmental Services
- 6) Gateways Community Services
- 7) Moore Center Services
- 8) One Sky Community Services
- 9) Community Partners
- 10) Community Crossroads



Individuals with active Service Authorizations as of 6/1/2016  
Includes all Service Levels associated with the DD, ABD, or .IHS waiver  
Does not include NCCW