

Division of Long Term Supports and Services ***BDS- Corrective Action Plan***

May 21, 2019

3:00 pm – 5:00 pm – BDS, Tom Fox Chapel

NASDDDS On Site Visit

NH Corrective Action Plan

**Financial Management Services (FMS) Rate
Development**



Corrective Action Plan

In the fall of 2016, NH was notified that they are not in compliance with CMS regulations in the following areas:

- Conflict of Interest (COI)- the direct service provider cannot also be the provider that develops and maintains the Person Centered Plan. The Case Manager cannot be the direct service provider or the organization cannot provide both to the same person.
- Direct Bill- An agency must have the opportunity to directly bill the state Medicaid Agency.

NH has until August 31, 2021 to be in compliance.



Conflict of Interest

Before 2014, conflict of interest under the 1915(c) waivers was guidance, *now it is in rules*

Providers of HCBS for the individual, or those who have an interest in or are employed by a provider of HCBS for the individual **must not provide case management or develop the person-centered service plan...**

§ 441.301(c)(1)(vi)



Corrective Action Plan - NH

4 NH Statewide subcommittees have been established to move the work forward:

- Direct Billing Subcommittee
- Provider Selection Subcommittee
- **Fiscal Management Services (FMS) / Rate Development Subcommittee**
- Communications Subcommittee



Goal:



Timelines for this Subcommittee

6/1/19: FMS Functions Finalized

6/1/19: Area Agency Functions Finalized

10/1/19: FMS Rate Finalized

10/1/19: Area Agency Rate Finalized

1/1/20: Establish Cost Allocation Plan for FMS and Area Agency

1/1/20: Service Rates Finalized

2/1/20: Develop Budget Template – Revisions Started

7/1/20: Budget Template Finalized

9/1/20: Submit Cost Allocation Plan to CMS

9/1/20: Begin Working with new Budget Template

*Handout



Progress to Date:



Question and Answer

Other Questions, Comments, Considerations?

Next FMS / DAADS Rate Development Meeting:

May 21st, 2019

10:00 am – 12:00 noon

Lilac Conference Room: BDS Main Building, Concord NH

