



Title Page

F/EA Support to Self-Direction Members
BMS1800000002

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Ben Bledsoe, President/CEO
December 12, 2017

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WV Purchasing Division

Executive Summary

Consumer Direct Care Network is grateful for the opportunity to submit this proposal to offer Fiscal/Employer Agent (F/EA) and Resource Consulting (RC) services for West Virginia's Department of Health and Human Resources (DHHR), Bureau of Medical Services (the Bureau). For 27 years, Consumer Direct has been guided by the philosophy of self-direction and has consistently provided related financial management and resource consulting services that allow members a higher level of choice and control in their lives. We have seen first hand that members with developmental or physical disabilities who successfully self-direct their supports can successfully live and thrive in their homes and communities. We look forward to the opportunity to serve West Virginia's members who choose to self-direct their Medicaid Home and Community Based Services using the Bureau's Personal Options model.

We have the hard-earned experience, financial stability and financial management services efficiencies to be an excellent partner to the Bureau. Since our founding in 1990 as a home-health company, we have been guided by the deeply-held belief in the value of self-determination. Although we offer extremely reliable and efficient payroll processing services, we are not simply a payroll company. Our philosophical foundation of commitment to member's well-being drives us to provide each state partner with outstanding customer service, accurate deliverables, collaborative relationships and national expertise.

In our nearly three decades working first in Montana, and now in 14 states across the country, Consumer Direct serves more than 16,000 members across the country, including transitioning more than 7,500 members and workers, efficiently and timely. Every state and every transition is unique. We leverage the expertise of our staff nationwide to maximize the coverage required in each new transition. While we initiate the transition in West Virginia using notarized Resource Consultants, we will simultaneously be hiring local staff to serve the entire state.

Our commitment to providing excellent customer service is ongoing. We survey the members we serve annually to continually improve how we do business. Beyond our outstanding ratings on these customer satisfaction surveys, our programmatic and contractual deliverables reflect our commitment to quality service. Readers of our response to this RFP for F/EA for self-directed services will learn that the work we do across the nation includes verifying qualifications of direct care support workers (DCSW)s, processing payroll, disbursing payment, billing for expenditures and making refunds as appropriate, maintaining records, producing and distributing reports, and providing support to members. Our response provides insight into how our consistent execution of efficient and accurate payroll processes, taxation services with proven approaches to fraud prevention, utilization of electronic visit verification and web portal time entry will meet and exceed the Bureau's rules and expectations.

Nationwide, Consumer Direct has experience both as an F/EA and in providing resource consultant services. Having experience in both aspects of enrolling members, supporting them through the self-directed process, and providing payroll services gives us unique insight to work collaboratively with other vendors when we aren't providing

both services. Through our years of experience supporting people so they may maintain choice and control in self-direction, we have remained committed to providing local, in-person support whenever possible. We realize that other F/EA providers can do this work at a cheaper rate. We believe the value in providing the appropriate level of resource consulting is worth the additional cost. Supporting self-directing members with local teams who know the local community and who understand the resources available to the member cannot be replicated.

Our commitment to training continues in supporting other stakeholders to understand the nuances of F/EA. We regularly work with case managers and program coordinators to train on member direction, person-centered planning, and program logistics. Our focus on customer service has consistently increased participation in self-directed programs, decreased complaints to the state, developed positive relationships with program coordinators, and improved members' quality of life.

Consumer Direct understands and provides a broad range of Medicaid-recognized models of self-directed personal care. We have extensive experience partnering with states as they transition from traditional service models of care to self-directed programs. We know what works well for each of the states in which we operate and how to provide the highest quality of care to those we serve. We hold two seats on the steering committee for Applied Self Direction (formerly the National Resource Center for Participant Directed Services), which influences national policy associated with Financial Management Services. Consumer Direct employs and contracts with nationally recognized experts in self-direction, person-centered planning, commercial health insurance, and Medicaid and Medicare policy. Consumer Direct offers an exceptional blend of knowledge, experience, reputation, and customer service in self-directed programs.

Consumer Direct is uniquely positioned and experienced to provide F/EA for self-directed services which deliver a higher standard of customer service and overall member experience. We are positioned to develop the program into an exemplary model for self-directed services. We look forward to the opportunity to work closely with the Bureau in an innovative and collaborative partnership for the highest caliber of self-directed program experience.

With best regards,

A handwritten signature in blue ink, appearing to read "Ben Bledsoe", is written over a light blue horizontal line.

Ben Bledsoe
President/CEO

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Attachment A: Vendor Response Sheet

Provide a response regarding the following: firm and staff qualifications and experience in completing similar projects; references; copies of any staff certifications or degrees applicable to this project; proposed staffing plan, descriptions of past projects completed entailing the location of the project, project manager name and contact information, type of project, and what the project goals and objectives were and how they were met.

Section 3, Subsection 3.1: Work plan

3.1 The Vendor should propose a work plan that should include, but not be limited to, the following components:

3.1.1 Organizational Chart for the overall organization and for the Subagent-F/EA FMS and RC divisions and related functions, and includes the contractor's staff assigned to perform the required services.

Consumer Direct Care Network West Virginia, LLC, will be led by an experienced team to ensure its success. Our executive team has a combined 90+ years of experience providing FMS services. The team is comprised of Ben Bledsoe, Chief Executive Officer, Beth Peterson, Chief Operating Officer, Jeff Harriott, Chief Information Officer, Daryl Holzer, Chief Financial Officer, and Mickey Ogg, Chief Commercial Officer.

Ben Bledsoe, President and CEO



Managing financial management services for more than 16,000 people with physical, developmental and cognitive disabilities, Ben brings a comprehensive vision to his work at Consumer Direct. He started with the company in 2004 as a caregiver to more than 50 participants and now oversees successful payroll processing for more than 25,000 DCSWs annually. Ben has extensive knowledge of Medicaid Personal Care Programs. His leadership and executive skills were recognized in 2013 when he was selected by Consumer Direct's ownership group to preside over the company's management reorganization. Ben will continue to serve self-directed individuals in West Virginia and nationwide, leading us to continue to serve in the best interest of individuals around the country.

Jeff Harriott, Chief Information Officer



Jeff has extensive experience with design and development of claims and reimbursement systems for Medicaid and Medicare entities in the US. Jeff leads and manages information technology operations for the family of 20 companies and over five hundred administrative employees. Jeff's expertise comes from more than twenty years' experience working in Medicaid and over thirty years' experience working in customer service and technological leadership. Jeff is certified as a Project Management Professional (PMP). Jeff and his team will provide technological support and technical guidance to Consumer Direct staff. As a member of the executive team, Jeff reports directly to Ben Bledsoe, President/CEO.

Daryl Holzer, Chief Financial Officer



Overseeing Consumer Direct's cash management and business operations analysis, Daryl is responsible for maintaining process flow efficiencies throughout the company. Since joining the company as Systems Director in 2003, he has provided analytics expertise in a variety of functionalities. He has overseen software and hardware systems, and has also provided oversight to several business office functions including Accounting, Payroll, Accounts Receivable, Accounts Payable, Data Entry, Information Technology and Cash Management. Leading growth and efficiency, and has helped the company increase efficiency and analyze future needs and business models. Daryl's expertise make him fit for his recent transition from our Chief Analytics Officer to our Chief Financial Officer. As a member of the executive team, Daryl reports directly to Ben Bledsoe, President/CEO. Daryl will be highly involved in the implementation and ongoing operations for timely payroll for DCSWs, and will be responsible for working directly with the Bureau should any needs for changes to tax filing or payroll procedures be required.

Mickey Ogg, Chief Commercial Officer



Mickey has a master's degree in business administration and multiple years of experience in compliance and oversight, financial projections, and business planning. Mickey oversees new business development opportunities, public policy, advocacy, and compliance review for Consumer Direct. Mickey has extensive experience in state relations, as well as detailed experience in the analysis of F/EA programs. Mickey is a valuable resource for analyzing fiscal and operational facets of current and potential programs. Mickey has eight years' experience working with the various populations served by Consumer Direct. Mickey will provide oversight for compliance of the Bureau's Subagent F/EA FMS and Resource Consulting program, and for the policy analysis and advocacy portions of our company operations that serve the Bureau's populations. As a member of the executive team, Mickey reports directly to Ben Bledsoe, President/CEO.

Beth Peterson, Chief Operating Officer



Beth Peterson's longstanding experience with consumer-directed care is highlighted by her time spent as a caregiver. Combined with her extensive operational knowledge and knack for detail, Beth is an invaluable resource to all of our new and existing programs. Her compassion for participants adds value to operational decisions that impact the rest of the company. Beth continues to engage in various trainings to uphold her well-rounded credentials as COO, including Person Centered Planning Advanced Facilitator Training, completed from 1995-2013. Beth oversees program operations of our companies providing services in 14 states. She helps develop policies and procedures for each program. All program and project managers report to Beth. As a member of the executive team, Beth reports directly to Ben Bledsoe, President/CEO. Both Beth and Ben will continue to operate as our executive-level advocates for members and DCSWs, as well as oversee functional aspects of the programs to ensure all contract requirements with the Bureau are met with operational efficiency and with participants' interest in mind.

West Virginia Operations and Administration

The team will support on the ground operations led by our senior operations director assigned to West Virginia operations, Kari Vinopal. She will initially serve as Project Manager while we recruit and hire a Charleston-based Project Manager. The Project Manager, supported by Kari, will maintain close contact with assigned Bureau staff to ensure consistent compliance with program rules and requirements. As senior operations director, Kari will remain involved in program operations throughout the course of the contract and will remain responsible for CDCN's presence in the state. Operations will be run from an office that will be located in Charleston with the support of our centralized administrative headquarters in Missoula, Montana.

Staff assigned to ensure the success of West Virginia's F/EA for self-directed services will be trained on West Virginia's specific program requirements to provide responsive and knowledgeable customer service, billing, quality control, policy, payroll, development, analytics, and human resources functions. Staff knowledgeable with West Virginia's program will assist with claims submission, invoicing, payroll processing, tax research, and all of West Virginia program needs. As West Virginia's program grows, staff will be added so that we always have the capacity to reliably serve West Virginia's members, DCSWs, and Bureau staff.

Experience shows successful self-directed F/EA and RC support begins with face-to-face enrollments that build relationships with members; clearly establish the roles of the RCs, of members as employers, and of DCSWs as employees of the member with support from the F/EA. Consumer Direct's enrollment process effectively establishes clear expectations by making sure the member, his/her representative, and his/her DCSW(s) feel supported and comfortable with the decision to self-direct. Consumer Direct staff are available upon enrollment and anytime throughout the course of service delivery to discuss and support members and DCSWs.

Consumer Direct Care Network West Virginia (Consumer Direct) will be staffed by personnel local to the area and knowledgeable about the community they serve. This will include a locally-based project manager, payroll and invoice payment manager, ADW supervisor, IDDW supervisor, qualified line staff, and resource consultant staff. These staff will be supported by administrative staff who work out of Consumer Direct's headquarters in Missoula, Montana. This model provides for the excellent customer service expected by members and DCSWs, and the efficiencies that come with high volume payroll processing. Consumer Direct's West Virginia staff will evolve and grow with the demands of the Bureau's various waiver programs and the needs of members. As stated above, administrative services including payroll processing, claims submission, invoicing, tax research, materials production, customer service support, and any other support needed by West Virginia staff, will be provided by Consumer Direct.

Efficiencies of the Consumer Direct Care Network allow Consumer Direct West Virginia to operate with the productivity and administrative support of a larger company, while maintaining the local presence required for high quality service delivery. These efficiencies include leadership from the Consumer Direct executive team and an experienced management team including our controller, billing systems manager, IT support manager,

Proposed Organizational Chart for West Virginia's Subagent F/EA FMS and Resource Consulting divisions, Leadership, and Administration

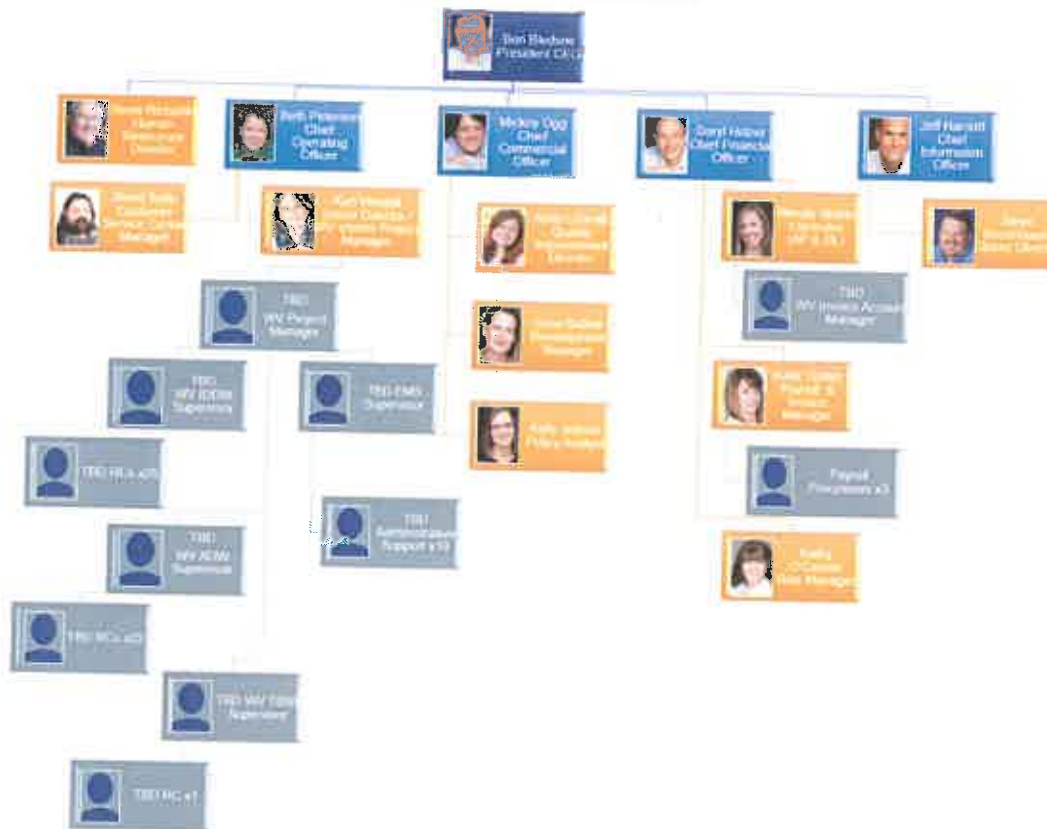


Figure 1: CDWV Organizational Chart

3.1.2 A description of the roles, responsibilities and skill sets associated with each position on the organizational chart, which should include the following:

3.1.2.1 The Vendor should propose a key position of a project manager for the Subagent-F/EA FMS and the Resource Consulting divisions with experience leading and effectively managing F/EA FMS operations. He or she should have a bachelor's degree from an accredited four-year college or university and have five (5) years' experience managing the provision of F/EA FMS, members' budgets and managing Subagent-F/EA FMS staff. The project manager's experience should include:

- Leading and managing the enrollment and disenrollment of members and their representatives with a F/EA FMS-Resource Consulting entity;
- Developing Employer Enrollment and DCSW Employment/Service
- Provider and Vendor Engagement Packets;
- Implementing the provision of common law employer orientation and skills training for members and representatives.



Kari Vinopal, Senior Director / Interim WV Project Manager, Subagent F/EA FMS and Resource Consulting divisions Kari has 22 years' experience managing programs that support individuals with disabilities and the elderly, including 15 years' specifically supporting F/EA operations under both the fee for service and managed care frameworks. Kari was instrumental in implementing

Washington DC's Services My Way program. As DC's first self-directed program, Services My Way has enrolled more than 400 members in the 18 months since program inception. Kari also implemented Colorado's Training and Operations program which provides training (Colorado's term for resource consulting) to approximately 3,000 participants. Consumer Direct started services in Wisconsin in 2008 under Kari's leadership and transitioned 400 plus members over a 4 week period from various accounting firms performing F/EA services. Additionally, Wisconsin was transitioning to a managed care based service model requiring Consumer Direct to assist with educating members not only on self-direction, but on a new service system. Upon award of contract with the Bureau, Kari and the Consumer Direct team will seek West Virginia-based personnel to locally manage Consumer Direct West Virginia's operations. We will seek to onboard current local staff interested in transitioning into the new program.

Kari will oversee onboarding and implementation for both the F/EA FMS and Resource Consulting divisions of our staff. With the support of our internal quality improvement team, Kari will oversee the adaptation of existing enrollment process to fit the particular needs of members using the Personal Options program. All enrollment documents and processes will be subject to approval of the Bureau. Kari will also utilize the support of quality improvement and development to adapt existing enrollment and engagement materials, and for finalizing the common law employer orientation and skills training curricula. All program materials will be adapted and developed in partnership and subject to the approval of the Bureau with Kari serving as the initial main point of contact.



Brent Selle, Customer Service Center Manager West Virginia members will be supported by the knowledgeable team who take calls to answer questions about paper timesheet submission, the submitting time through the portal, or other questions that require a quick but informed response. The Customer Service Center provides support to the Resource Consultants. Because the RCs and the

CSC track calls and inquiries through our Customer Relationship Management (CRM) system, conversation and topic transitions among team members are seamless.

Brent joined Consumer Direct three years ago for the inception and ongoing development of our center, and is well-versed in the particular needs of each of our programs. Brent supports all levels of the center, to include hiring, scheduling, education of staff members, and coaching. Brent oversees our processes for managing call queues and developing routing as well as scheduling staff to maintain adequate customer service for all programs regardless of growth and volume. Brent orchestrates all CSC operational efforts to balance program need while creating consistency and efficiency in processes across the company. Focus is also placed on metrics to ensure adequate customer service on an ongoing basis.

3.1.2.2 The Vendor should have a payroll and invoice payment manager with a bachelor's degree from an accredited four-year college or university and two (2) years' experience processing DCSWs' timesheets and preparing and issuing DCSWs' payroll; processing and paying invoices to service providers and participant-directed goods and services vendors; and performing related activities including developing and maintaining a separate bank account, database copies, files and records and preparing and issuing reports to participants and government agencies, as required.



Katie Trotter, Payroll Manager and Interim WV Payroll Manager Katie has more than 20 years' experience developing expertise in payroll processing. She spent the last three years working with Consumer Direct's F/EA department and new F/EA member profiles to build upon successful F/EA processes and create more efficient methods of payroll processing and tax filing. Katie came to Consumer Direct from a health clinic, which complements her business experience. Katie reports to Daryl Holzer, our Chief Financial Officer, and will be a secondary point of contact for the Bureau in the event payroll processes or tax filing process should need alteration.



Wendy Stuker, Controller and Interim WV Invoice Payment Manager As a CPA with ten years' experience in accounting field, Wendy Stuker has worked her way up through the chain of command for Consumer Direct and she now serves as the Controller. In this role, Wendy oversees financial statement preparation and ensures accurate and timely billing practices. Wendy has deep understanding of and oversees the effective management of finances in our F/EA models since 2011. Wendy continues to work closely with this model to ensure all payments are remitted in a timely manner and that payroll operations function smoothly. We value Wendy's hard work over the past four years with us and look forward to what she will continue to contribute to the technical billing aspects behind DAIL's self-directed programs. Wendy graduated from the University of Montana with a bachelor of science in business degree in 2004, and a masters in business administration in 2006. She earned her CPA in Montana in 2007.



Daryl Holzer, Chief Financial Officer With 14 years' experience as Consumer Direct's CFO, Daryl Holzer is an expert in the financial management systems required to work successfully with state partners and Medicaid-funded programs. His teams will oversee all required financial accountability and reporting for West Virginia's Department of Health and Human Resources.

3.1.2.3 The Vendor should have a key position of an ADW supervisor with a bachelor's degree from an accredited four-year college or university and two (2) years' experience working with the ADW members who are self-directing their services.

Job postings and descriptions for the ADW supervisor position will reflect the experience and educational requirements as set by the Bureau. Our experienced development and operations staff will hire candidates who are well-suited to fill the position and all corresponding responsibilities. For the key supervisory positions for this program, we will welcome existing vendor's qualified staff to join our team and provide additional program continuity. We will ensure that, whether hiring from existing vendor or personnel new to the program, our ADW supervisor will have at least a bachelor's degree from an accredited four-year college or university and two (2) years' experience working with the ADW members who are self-directing their services.

Kari and the selected Project Manager will be in consistent contact with the Bureau as positions are filled and candidates are selected. Positions will be posted both internally to our existing staff from around the country and externally to local WV job sites.

3.1.2.4 The Vendor should have a key position of an IDWW supervisor with a bachelor's degree from an accredited four-year college or university and two (2) years' experience working with IDWW members who are self-directing their services.

As with the ADW supervisory position, job postings for the IDWW supervisory will reflect the experience and educational requirements as set by the Bureau. Kari and the selected Project Manager will be in consistent contact with the Bureau as positions are filled and candidates are selected. Positions will be posted both internally to our existing staff from around the country and externally to local WV job sites.

Our IDWW supervisor will have at least a bachelor's degree from an accredited four-year college or university and two (2) years' experience working with IDWW members who are self-directing their services.

3.1.2.5 The Vendor should have a key position of a TBIW supervisor with a bachelor's degree from an accredited four-year college or university and two (2) years' experience working with TBIW members who are self-directing their services.

As with other supervisory positions as mentioned earlier in this response, the TBIW position will reflect the experience and educational requirements as determined by the Bureau. Kari, our initial Project Manager, will oversee recruitment and onboarding of all major positions and the Bureau will be notified of any major staffing changes.

Our TBIW supervisor will have at least a bachelor's degree from an accredited four-year college or university and two (2) years' experience working with TBIW members who are self-directing their services. Because the TBIW program is smaller than the other waiver

populations, the TBIW supervisor may also take on other supporting roles for CDWV staff. We will evaluate the position and role on an ongoing basis to ensure that TBIW participants receive the best quality F/EA and resource consulting services from CDWV staff.

3.1.2.6 The Vendor should provide qualified line staff of persons with one (1) year experience in supporting individuals in home and community based settings and a bachelor's degree from an accredited four-year college or university in a human service field for instate project management.

We will seek to hire any and all qualified line staff from the incumbent vendor. Line staff with well-established relationships with participants provide an important element of stability for members and DCSWs. CDWV will seek out those individuals and provide a seamless employment transition for those who are qualified and interested.

3.1.2.7 The Vendor should provide RC staff that ensures statewide coverage at a ratio of one (1) RC to no more than one-hundred (100) self-direction members. This caseload may be a mix of ADW, TBIW and IDDW self-direction members.

Regional RCs will be trained in the regulations and requirements for each waiver population so they can effectively support participants whose needs are unique depending on the waiver by which they are served.

We will accommodate the Bureau's required statewide coverage at a ratio of one (1) RC to no more than one-hundred (100) self-direction members. Should the number of participants rise or fall, we will adjust accordingly while maintaining adequate RC interaction, support, and customer service for members and DCSWs.

3.1.3 Key staff positions should be identified with named individuals and resumes demonstrating experience with participant-direction and best practices for HCBS for each key staff member performing Subagent-F/EA FMS and RC related work.

Resumes of key personnel as noted in our response to Section 3.1.1 are included in this response as Appendix A: Personnel Resumes. All resumes include experience with Consumer Direct, experience in projects of similar scope and size, and educational background including certifications, and experience with participant-direction and best practices for HCBS experience with participant-direction and best practices for HCBS.

3.1.4 The Vendor should have one (1) Full Time Employee (FTE) assigned to each key staff indicated except for the TBIW supervisor.

One (1) Full Time Employee (FTE) will be assigned to each key staff Indicated except for the TBIW supervisor. Please see Figure 1: CDWV Organizational Chart. We have elected to exceed the Bureau's suggested ratio of 1 RC to 100 members as we believe the RC's role in ensuring member success is essential. The TBIW's assigned RC will also take overage from the other waiver populations as necessary.

3.2 The Vendor should have knowledgeable management and line staff that with five (5) years' experience in providing F/EA FMS and RC services, and serving older adults and individuals

with physical, intellectual, and developmental disabilities and traumatic brain injury and their representatives, as necessary.

Our management and line staff will have at least five (5) years' experience in providing F/EA FMS and RC services, and serving older adults and individuals with physical, intellectual, and developmental disabilities and traumatic brain injury and their representatives, as necessary. For more detail on their backgrounds and professional experiences, please refer to Appendix A, Personnel Resumes.

3.3 The Vendor should have five (5) years' experience in providing F/EA FMS (either as a subagent to a Government F/EA FMS agency or as a Vendor F/EA FMS entity) and RC services to Medicaid members. The Vendor should provide a narrative that demonstrates its experience in providing F/EA FMS services, as the subagent to a Government or Vendor F/EA FMS and providing RC services, has considered all of the requirements and developed an approach that will support the continued successful implementation of self-directed services in West Virginia.

Consumer Direct is a national full-service provider of self-directed services to more than 16,000 members in 14 states. For more than 27 years we have worked with a range of state agencies, county governments, and MCOs executing both large and small contracts, and we have performed a broad scope of FMS delivery types including F/EA. We are currently contracted with over 90 entities for the delivery of varied resource consulting and financial management services.

Consumer Direct delivers unparalleled F/EA and Resource Consulting services by providing outstanding customer service for member employers and their workers, accurate program deliverables, and effective collaboration with state partners. We work with the elderly, individuals who have a developmental or physical disability, and individuals' families, support networks and full interdisciplinary teams in Alaska, Arizona, Colorado, Florida, Idaho, Michigan, Minnesota, Missouri, Montana, Nevada, New Mexico, Texas, Wisconsin and the District of Columbia.

We have in-depth experience with implementing new F/EA and Resource Consulting programs, with taking over existing program operations, and with seamlessly transitioning F/EA and Resource Consulting services to an incoming subagent. Through these experiences, we can appreciate the necessity for efficient and effective transfer of services for the state, the DCSWs, and most importantly, the members receiving the services.

Our approach to self-direction recognizes the many elements required for success in self-directing one's own personal care. These layers are essential in combination to ensure members and DCSWs a seamless transition, seamless payroll, professional and reliable staff, and reliable customer service throughout the duration of their involvement with any self-directed program. We track all member and DCSW contacts to allow for centralized documentation and expedient customer service. We are able to customize reporting to the Bureau's requirements, and we maintain open, professional, and collaborative lines of communication with state agencies should any issues arise. We are well versed in the intricacies of serving varied populations, and our service delivery allows for additional customizations for individuals and DCSWs who request alternate forms of communication, training, or program documents. Our philosophy is to support any mode of self-direction

members may request or require, and our systems and policies offer consistent and reliable support to members and DCSWs on an ongoing basis. Finally, we place customer service and timely and reliable payroll as our utmost priority to ensure members get the care they need on a continual basis. In addition to our comprehensive and sophisticated claims, accounting, and customer relationship management software, all of these factors combined make us well-suited for functioning as a collaborative partner to the Bureau for delivery of F/EA and resource consulting within the Personal Options program.

Our experience providing Resource Consulting services for more than 10 years has taught us that there is no substitute for having trained, knowledgeable consultants in the field who are responsive and engaged with the members and DCSWs they support. From the time of the face-to-face enrollment, our Resource Consultants are committed to seeing the members they support succeed as an employer. Use of our customer relationship management (CRM) software allows them to accurately and comprehensively summarize the enrollment meeting. Monthly follow-up calls to self-directed members will be documented in the CRM. Consumer-directed members in waiver programs who need additional training will find that whether they reach their original Resource Consultant, or a representative in the customer service center, our staff will be knowledgeable about their background and well-equipped to help.

Examples of ongoing programs which align closely to the Bureau's self-directed model of F/EA with RC includes our work in Arizona, Florida, Idaho, Texas, Washington DC, and Wisconsin. Within these programs, we focus on providing expert F/EA and payroll processing services to programs that lead to members' increased control over their care and greater community involvement. Depending on the state or municipality in which we operate, we adjust the specifics of the self-directed services package to meet the state requirements of the individual receiving the care. In addition to our 27 year company history serving Medicaid members age 65 and older and individuals with a developmental or physical disability, Consumer Direct companies have provided FMS services in Alaska, Montana, Nevada and New Mexico for more than 15 years. We also provide resource consulting services in New Mexico under the state's Mi Via program.

As evidenced in the contracts listed below, we have provided F/EA and RC (supports brokerage) services for more than the Bureau's required five (5) years. In most of our F/EA states, Consumer Direct was selected to provide services when the programs began, rather than transitioning into existing programs. The exception to this is in Idaho where we were selected to take over from a failed contract in 2009. At that time we transitioned Idaho's existing 400 members and DCSWs to our services in a four-week timeframe.

Projects Similar to the Bureau's Self-Directed Programs

We list our state programs below as evidence of our experience and capability in successfully providing F/EA, RC, and additional services across a range of populations. In addition to extensive F/EA and RC experience, we also have experience working in the Agency with Choice (AWC) model. In AWC, where we serve as the primary employer and the member is the "managing employer" of the DCSWs, we utilize our company's training and resource consulting skills to support the member as the managing employer. Our collaborative, problem-solving reputation with state contracts has proven we can support states in their goal to expand self-directed services, provide for the prudent oversight of

public dollars, and support members to remain healthy and productive members of their communities.

As evidence of five (5) years' experience providing F/EA FMS and RC we list here the state programs that are in this category of service provision, as well as other state programs indicating our longevity and breadth of knowledge. All contract entities listed below are current and ongoing.

1. New Mexico

Contracts: New Mexico Department of Human Services; United Healthcare; Molina; Blue Cross Blue Shield; Presbyterian Centennial Care

Duration: Since 2002

Models of Service: F/EA, resource consulting, AWC

Consumer Direct has been providing personal care services throughout New Mexico since 2002, including F/EA, resource consulting and, most recently, delegated services. In 2006 Consumer Direct was awarded the Mi Via Consulting Services contract; we are now also a provider agency. We provide F/EA and resource consulting services for more than 2,200 individuals and 2,600 employees under the Mi Via statewide waiver program.

As evidence of our experience with transitioning participants and DCSWs, we point to the seamless transition of approximately 1,000 members and the 2,100 (approximate) corresponding workers from the Agency with Choice (AWC) model to F/EA in 2014. We initiated this transition with the members who received more than 40 hours of service per week and had only one DCSW providing that service, then completed the transition with those members served by multiple DCSWs.

We completed these transitions during our required quarterly visits with members which ensured timely completion. The entire transition for all members took approximately six months and we reached all members statewide. One member elected not to transition to F/EA, and we allowed this exception as part of our customer service as we knew this member would be transitioning to New Mexico's MiVia (resource consulting) program within a few months.

2. Idaho

Contract: Idaho Department of Health and Welfare

Duration: Since 2008

Models of Service: F/EA, RC, reimbursements for Goods and Services

Idaho Consumer Direct has provided services to more than 1,800 adults and children with developmental disabilities in the My Voice, My Choice and Family Directed Services programs, as well as individuals on the Autism Spectrum. These programs allow members to receive services in their home by providing the flexibility of hiring their own Community Support Workers and choosing their own vendors for goods and services. Some of the services provided by Idaho Consumer Direct include enrollment trainings, processing payroll and vendor checks, withholding and filing employee and employer taxes, issuing W-2s, providing spending reports to track expenses, processing employee paperwork, and generating required reports for Medicaid, the IRS, and the Idaho Tax Commission.

In 2009 when we took over the state's F/EA clients, we transitioned approximately 400 members and 500 DCSWs combined in 30 days.

Our transitions are particularly efficient due to our commitment to diligent communication between the state and the previous FMS, the thoroughness and detail we provide in our

action plan, and our rehabilitation of member-FMS relationships as we did in Idaho. Ten program coordinators from our other Consumer Direct companies traveled to Idaho to provide statewide enrollments, scan paperwork to our electronic filing system, and help with data entry. We also required resources from our administrative headquarters to facilitate the transition by sort through data, process tax documents, enter members and employees into our payroll system, and develop all the required reports.

Although all transitions are complex, Consumer Direct overcomes the hurdles that arise so that all DCSWs are paid on time without undue burden to the agency. One hurdle we overcame in Idaho, was the drastically different record-keeping system used at the time, which yielded incomplete or inaccurate information on members. With extra work, we were able to resolve record discrepancies and provide a seamless transition for the agency, members, and DCSWs.

3. Arizona

Contracts: Banner Health, MercyCare, Bridgeway, United Healthcare, Southeast Arizona Governments Organization

Duration: Since 2007

Models of Service: F/EA, resource consulting, AWC, agency-based traditional

Consumer Direct Arizona offers a range of FMS services including face-to-face enrollment and self-direction training to more than 800 individuals in the F/EA and AWC models. CDAZ supports the needs of functionally eligible members over the age of 18 with a variety of physical, developmental, and intellectual disabilities.

4. Wisconsin

Contracts: Includa, Inc., Lakeland Care District, Care Wisconsin, Community Care Inc,*

Duration: Since 2008

Models of Service: F/EA, resource consulting, AWC, reimbursements for Goods and Services

**Wisconsin's MCOs Community Care Connections of Wisconsin, Western Wisconsin Cares, and Community Link, Inc. recently merged and rebranded as Includa.*

Consumer Direct has completed several transitions in Wisconsin of various sizes from different FMS providers or from AWC to F/EA. In 2008 we successfully transitioned over 400 members and almost 500 workers in a four week period from accounting firms providing F/EA services and to a new managed care based service system. During 2014, more than 900 members and almost 1,200 workers were transferred from AWC to F/EA over a two month period.

Consumer Direct supports members self-directing in Wisconsin through Family Care, the State's managed care option. Through the Family Care self-directed program, Consumer Direct acts as the co-employer in the Agency with Choice model or as the Fiscal Management provider in the Fiscal Employer Agent model where the member is the common law employer. In this capacity we work with adults with intellectual and developmental disabilities, adults with physical disabilities, elderly adults, and adults with HIV/Aids and Traumatic Brain Injury (TBI). Consumer Direct supports over 1,500 members throughout the state each month. Our service consists of enrollment meetings with the member and caregiver(s), processing payroll, filing taxes, and issuing W-2s. We also provide support and education to the managed care organizations in such areas as the changes related to the Fair Labor Standards Act (FLSA) Homecare Rule.

5. Texas

Contract: Texas Department of Aging and Disability Services; Amerigroup; Molina; United Healthcare; Blue Cross Blue Shield

Duration: Since 2010

Models of Service: F/EA, resource consulting, reimbursements for Goods and Services

In Texas, we contract with the state's Department of Aging and Disability Services and several MCOs to currently serve approximately 2,300 adults and children providing F/EA and RC services. In this capacity, Consumer Direct also provides budget planning and assistance, background checks, training on self-direction, reports, and web-based Information.

6. Florida

Contract: Sunshine State Health Plan, Molina, United

Duration: Since 2013

Models of Service: F/EA, resource consulting

Consumer Direct Florida provides face-to-face enrollment service and ongoing support through telephone consultations. We serve as the F/EA for more than 3,000 Floridians statewide who are elderly or have a disability requiring long term services and supports.

7. District of Columbia

Contract: Department of Health Care Finance

Duration: Since 2016

Models of Service: F/EA, resource consulting, reimbursements for Goods and Services

In just 18 months in operation, the District's Services My Way program has enrolled more than 400 District residents with face-to-face enrollments, and supports those participants with quarterly home visits and monthly telephone calls. Members are enrolled in the Medicaid Elderly and Persons with Physical Disabilities (EPD) Waiver.

8. Montana

Contracts: Montana Department of Public Health and Human Services; Department of Veterans Affairs; Missoula County Public Schools; Blue Cross Blue Shield; Pacific Source Health Plan; Allegiance Benefit Plan

Duration: Since 1990

Models of Service: Resource consulting, AWC, traditional agency, behavioral health, private duty nursing, hospice

Consumer Direct provides a broad range of personal care services in Montana. We provide FMS and Support Broker services in the state's Big Sky Bonanza waiver program serving older adults and people with a physical disability. Our company was founded here in 1990 providing traditional agency based private duty nursing and state plan services.

Consumer Direct's licensed behavioral health company provides behavioral and social supports for children with Serious Emotional Disturbance, mental health issues, and Autism Spectrum Disorder. We also provide wraparound services for families and children, agency-based psychological and social services, clinical therapies, and Applied Behavioral Analysis.

9. Alaska

Contracts: Alaska Department of Health and Social Services; Alaska Commission on Aging; Department of Veterans Affairs; Qutekcak Native Tribe; Southeast Senior Services; Office of Children's Services

Duration: Since 2001

Models of Service: Resource consulting, AWC, behavioral health

Personal Care Services (PCS), chore, respite care, and habilitative care. Behavioral Health Services for Adults, Children and Families.

10. Colorado

Contract: Department of Health Care Policy and Finance

Duration: Since 2015

Model of Service: resource consulting services

Consumer Direct Colorado is the training and operations vendor supporting three FMS agencies with resource consulting to approximately 3,000 participants. In Colorado, members can elect face-to-face, group, or telephone enrollments.

11. Nevada

Contracts: Nevada Aging and Disability Services Division; Eureka County; Amerigroup; Health Plan of Nevada

Duration: Since 2003

Models of Service: AWC

Consumer Direct Nevada (CDNV) has operated statewide since 2003 serving adults and children with physical and intellectual or developmental disabilities. CDNV is the only statewide personal care services provider in Nevada.

12. Missouri

Contracts: Adair County; Perry County Board for the Developmentally Disabled

Duration: Since 2012

Models of Service: F/EA, resource consulting services

Consumer Direct Missouri supports a small number of rural and urban participants with remote enrollments and ongoing support for self-directed services.

13. Michigan

Contracts: Riverwood Center; Berrien County; North Country Community Mental Health; Area Agency on Aging of Northwest Michigan

Duration: Since 2016

Models of Service: F/EA, resource consulting services

Consumer Direct Michigan supports individuals throughout the enrollment process and ongoing. We serve a range of constituents including adults and children with intellectual or developmental disabilities, serious emotional disturbances, or substance use disorders who receive services through state plan and waiver funding. For the AAA contract, we provide Fiscal Intermediary (FI) supports to older adults and adults with disabilities.

14. Minnesota

Contract: Minnesota Department of Human Services

Duration: Since 2017

Model of Service: F/EA

Consumer Direct Minnesota is a fiscal support entity for older adults and people with long-term disabilities who self-direct their care.

3.4 The Vendor should provide detailed information from three (3) references detailing evidence of their experience in providing both Subagent F/EA FMS and RC services described in this RFP performed in the past five (5) years. References should include contact name, phone number, email address and the responsible project administrator familiar with the firm's performance; along with length of time the vendor provided services, what type of services and level of satisfaction (i.e. Not Satisfied with explanation, Satisfied, Very Satisfied).

Contact Name and responsible project administrator familiar with Consumer Direct's performance: Livia Ivascu, Medicaid Program Manager, Regions 1 & 2, Idaho Bureau of Developmental Disability Services

Phone: 208-769-1567 x8824

Email: lvascuL@dhw.idaho.gov

Length of time Consumer Direct has provided services: Nine years

Type of services: F/EA and resource consulting

Level of satisfaction: Very Satisfied

Contact name and responsible project administrator familiar with Consumer Direct's performance: Kate Norby, Director of Self-Determination/SDS, Includa, Inc. *

Phone: 715-216-5587

Email: kate.norby@includa.org

Length of time Consumer Direct has provided services: Nine years

Type of services: F/EA and resource consulting

Level of satisfaction: Very Satisfied

*Wisconsin MCOs. Community Care Connections of Wisconsin, Western Wisconsin Cares and Community Link, Inc. recently merged and rebranded as Includa.

Contact name and responsible project administrator familiar with Consumer Direct's performance: Kim Shipman, Deputy Account Manager, Conduent (formerly Xerox-New Mexico Government Healthcare Solutions)

Phone: 505-463-4458

Email: kim.shipman@conduent.com

Length of time Consumer Direct has provided services: Ten years

Type of services: F/EA and resource consulting

Level of satisfaction: Very Satisfied

Section 4, Subsection 4.1: Project and Goals

4.1 The Vendor should describe their approach to the West Virginia Bureau of Medical Services how they will provide F/EA FMS as a subagent to the Bureau (the Government F/EA FMS agency) and Resource Consulting (RC) services.

Consumer Direct takes a solutions-oriented approach to partnering with agencies in the interest of seamless service delivery for members and their DCSWs. By supporting local expertise and leadership in West Virginia and combining local staff with centralized administrative support from Consumer Direct, we can support the Bureau in their goal of providing fiscally responsible support to West Virginia residents who qualify to self-direct their in-home care.

CDWV acknowledges and clearly understands the information presented by the Bureau regarding the full scope of work included in this procurement. We are capable and willing to be a collaborative, accountable, and innovative provider in partnership with the Bureau. We are knowledgeable and accountable for serving the population as described in this proposal and are fully equipped meet local West Virginia staffing requirements.

Through our experience transitioning participants and DCSWs, we have developed the competencies needed to transition West Virginia's self-directed members and workers within the time frame required. We look forward to partnering with the Bureau to increase participation in and satisfaction with HCBS programs in your state. We are accountable for our actions, the actions of our staff, and for our reputation nationally. Experience has shown that it is vital to exhibit integrity and compassion through exceptional service delivery for participants, their families, and workers; these qualities become self-evident through our business model which puts members and DCSWs at the center of everything we do.

4.2 Bidders should propose systems, policies and procedures and internal controls to perform the F/EA FMS tasks as a subagent and the RC tasks listed in the Scope of Work below. This includes how adjustments would be made to respond to Bureau needs, as well as any changes in State or Federal regulations that may occur during the contract period.

Systems

Consumer Direct's internal systems for operating as a subagent F/EA FMS and RC include a flexible and comprehensive implementation process that incorporates input from all departments. Implementation begins with communication with the state to confirm program rules and regulations are current and that implementation timeline and priorities are consistent with state expectations.

Systems continue with cooperation from Consumer Direct teams as required: executive leadership, operations, human resources, F/EA, development/implementation, QI, claims, and customer service center. Our systems remain flexible and time sensitive as the program is implemented, and ongoing.

Policies and Procedures

As a skilled F/EA FMS organization in several of the 14 states in which we operate, we are accustomed to developing and employing detailed policy and procedure manuals outlining

procedures for enrolling and obtaining FEINs for members, hiring workers, tax filing procedures, workers' compensation procedures, and ongoing payroll procedures. To illustrate some of the policies and procedures we have in place governing our F/EA FMS programs, Consumer Direct provides for the Bureau a copy of our current policies and procedures manual for Consumer Direct Care Network Idaho, as part of this proposal and attached as **Appendix B, Sample Base Policies and Procedures Manual for F/EA FMS and Resource Consulting.**

Upon award of contract, we will adapt current F/EA FMS and Resource Consulting policies to include procedures for operating as a F/EA FMS that are in line with all Federal, West Virginia, and any applicable municipality's labor, tax, wage, and employment laws. The newly adapted manual will be submitted to the Bureau during the Readiness Review period for Bureau review and approval. We commit to providing the F/EA FMS Organization Procedures Manual (Manual) to the Bureau annually, and will look to the Bureau for review and approval of updates to the Manual as federal or state policies change.

Internal Controls / Regulatory Review Process

We consistently monitor any federal or local regulatory changes with potential to require changes to service delivery for members or DCSWs, or our operations on any level. Policy areas we track include (but are not limited to) labor, tax, employment, and workers' compensation laws. We invest time with our policy research, legal research, and local program staff to be sure we understand and interpret changes that come our way accurately, and we base changes to our operations on those sound interpretations. We do not hesitate to seek outside legal counsel in scenarios in which we are unclear how to interpret or respond to a regulatory change. We have processes in place for policy change absorption, clarification and research, and dissemination to operations and program teams who work to translate regulatory changes into policy manual changes, communications to members, changes to forms, reporting, data security, document storage, program operations, or any other aspect of service delivery wherein changes may be required. We employ full time staff who are committed to monitoring federal, state, and local changes continually.

We seek additional support in understanding policy changes related to F/EA FMS and Resource Consulting through use of the expertise of Applied Self Direction (ASD), which is the technical assistance (TA) and research arm for FMS entities across the nation. ASD was formerly a part of the Boston College National Resource Center for Participant-Directed Services (NRCPDS), a nationally recognized research and TA partner for self-direction. Additionally, we utilize our relationship with Applied Self Direction to remain up to date with labor laws and public policy related to self-direction. We also work closely with state advocacy and provider associations for more focused policy guidance in many of our states. When necessary, we consult with attorneys for guidance on specific topics related to the self-directed employment model.

In addition to accessing outlets mentioned above for policy guidance, we believe that being as connected as possible to our local communities helps us stay out in front of policy changes affecting providers like us in the healthcare industry.

4.2.1 The Vendor should be the Subagent to the West Virginia Government F/EA FMS agency (the Bureau) and should be wholly responsible for completing all Subagent-F/EA FMS and RC tasks and deliverables.

Upon award of contract, Consumer Direct acknowledges and commits to operating as the Subagent to the Bureau, and will be wholly responsible for completing all Subagent-F/EA FMS and RC tasks and deliverables.

4.2.2 The Vendor should participate in a Subagent- F/EA FMS-RC Readiness Review, if requested by the Bureau; and should provide the results within thirty (30) calendar days.

We are accustomed to working closely with state partners in the readiness review process when implementing new programs. We look forward to working with the Bureau to achieve all objectives and timelines to the satisfaction of this procurement, both at the time of contract execution and ongoing throughout the term of the Grant Agreement. We commit to having sufficient staff devoted to the readiness review process, to include staff from our Executive, Operations, Quality Improvement, Policy, Development, Billing and Claims, Payroll and any other departments deemed necessary for program implementation. We will adjust staff numbers and scope according to the preference of the Bureau. Agreed upon metrics to determine full readiness will be applied to our internal processes and results will be presented within thirty calendar days of the agreed-upon deadline.

A sampling of some of the tasks we incorporate into our readiness phase of contracts for newly awarded programs is below. This table assumes a contract award date of January 1, 2018 and three (3) months for start-up. Our task timeline will be updated according to actual contract award date.

| Readiness Review Task Description | Start Date | End Date | Length (Days) | FTE's | Hours |
|--|------------|-----------|------------------|-------|-------|
| | | | | | |
| Contract Execution for F/EA FMS & RC | 1/2/2018 | 2/1/2018 | 30 | 10 | 504 |
| | | | | | |
| Review Program Requirements | 1/2/2018 | 1/15/2018 | 15 | 10 | 464 |
| Adapt Program Requirements to new materials | 1/5/2018 | 2/1/2018 | 20 | 10 | 400 |
| Establish Stakeholder Communications | 1/5/2018 | 1/15/2018 | 10 | 8 | 24 |
| Document all Requirements and Stakeholders | 1/5/2018 | 2/1/2018 | 25 | 8 | 40 |
| CDCN WV Office Location | 1/2/2018 | 2/15/2018 | 45 | 4 | 316 |
| Hire Charleston Realtor | 1/2/2018 | 1/2/2018 | 1 | 2 | 6 |
| Search Locations | 1/5/2018 | 1/20/2018 | 15 | 4 | 240 |
| Secure Office Location | 1/25/2018 | 1/30/2018 | 5 | 4 | 40 |
| Secure Lease | 2/15/2018 | 2/16/2018 | 1 | 4 | 30 |
| Equip Offices | 2/16/2018 | 3/15/2018 | 30 | 4 | 162 |
| Order Equipment | 2/15/2018 | 3/1/2018 | 15 | 3 | 20 |

| | | | | | |
|--|-----------|-----------|----|----|-------|
| Order Furniture | 2/15/2018 | 3/1/2018 | 15 | 3 | 20 |
| Order Supplies | 3/1/2018 | 3/15/2018 | 15 | 3 | 12 |
| Setup IT Infrastructure | 2/20/2018 | 3/15/2018 | 25 | 5 | 30 |
| Install/Organize Equipment & Supplies | 3/15/2018 | 3/30/2018 | 15 | 4 | 80 |
| Staffing | 1/2/2018 | 3/1/2018 | 60 | 6 | 289 |
| Develop Job Descriptions | 1/2/2018 | 1/4/2018 | 4 | 4 | 25 |
| Partner with Staffing Agency | 1/4/2018 | 3/1/2018 | 14 | 4 | 16 |
| Advertise Jobs | 1/8/2018 | 2/8/2018 | 30 | 2 | 8 |
| Conduct Interviews | 1/15/2018 | 2/15/2018 | 30 | 4 | 60 |
| Make Employment Offers | 2/1/2018 | 3/1/2018 | 30 | 2 | 20 |
| Update/Customize Training Materials | 1/15/2018 | 2/15/2018 | 30 | 6 | 80 |
| Conduct Staff Training | 3/1/2018 | 3/30/2018 | 30 | 4 | 80 |
| Systems & Structures | 2/1/2018 | 3/30/2018 | 60 | 10 | 4,872 |
| Initiate Communications with Incumbent F/EA FMS | 2/1/2018 | 2/7/2018 | 7 | 1 | 6 |

| | | | | | |
|---|-----------|-----------|----|----|-----|
| Conduct Data Needs Meeting | 2/8/2018 | 2/9/2018 | 2 | 10 | 40 |
| Acquire User Data | 2/12/2018 | 2/28/2018 | 15 | 6 | 148 |
| Prepare Data Warehouse | 2/15/2018 | 2/20/2018 | 5 | 4 | 80 |
| Download Data 1 | 2/20/2018 | 2/23/2018 | 3 | 4 | 32 |
| Download Data 2 | 2/26/2018 | 2/27/2018 | 1 | 3 | 5 |
| Download Data 3 | 2/27/2018 | 2/28/2018 | 1 | 2 | 5 |
| Software Configuration | 2/15/2018 | 3/1/2018 | 15 | 10 | 800 |
| Create Website | 2/12/2018 | 3/16/2018 | 5 | 4 | 40 |
| Configure CRM | 2/15/2018 | 3/1/2018 | 15 | 5 | 200 |
| Configure Back Office Systems | 2/15/2018 | 3/15/2018 | 30 | 5 | 800 |
| Configure Communication Systems/Integrate New Office with Data Warehouse | 2/15/2018 | 3/15/2018 | 30 | 5 | 200 |
| Audit Data 1 | 3/1/2018 | 3/6/2018 | 4 | 8 | 320 |
| Audit Data 2 | 3/7/2018 | 3/9/2018 | 3 | 5 | 160 |
| Audit Data 3 | 3/12/2018 | 3/14/2018 | 3 | 5 | 160 |
| Systems Testing | 3/1/2018 | 3/15/2018 | 15 | 8 | 640 |
| Develop and Adapt Business Processes | 3/1/2018 | 3/30/2018 | 30 | 16 | 224 |

| | | | | | |
|---------------------------------------|-----------|-----------|----|----|-----|
| Create Communications Plan for Users | 3/1/2018 | 3/15/2018 | 15 | 6 | 12 |
| Train Users on System/Process Changes | 3/15/2018 | 3/30/2018 | 15 | 5 | 800 |
| Develop Reporting | 3/1/2018 | 3/15/2018 | 15 | 10 | 200 |
| Transition Current Users | 3/15/2018 | 3/30/2018 | 15 | 12 | 992 |

4.2.3 The Vendor should prepare a plan of correction that addresses the findings of the Subagent- F/EA FMS — RC Readiness Review/Ongoing Performance Review and a timeline for implementation, as needed.

Should a shortcoming in the readiness review/ongoing performance review be found, a plan of correction will immediately be enacted to rectify the shortcoming.

4.2.4 The Vendor should participate in an annual Subagent-F/EA FMS — RC Ongoing performance Review, if requested by the Bureau.

In addition to our internal annual reviews as conducted by our Quality Improvement (QI) team, we look forward to working with the Bureau to complete an annual performance review for all areas of Subagent F/EA FMS and RC performance delivery. We will work closely with the Bureau to establish indicators of success within the performance review, and will monitor and report our progress toward achieving those metrics periodically and upon request of the Bureau.

4.2.5 The Vendor should prepare and maintain a Quality Management System to ensure that its systems, policies and procedures and internal controls for each Subagent F/EA FMS and RC task are performed accurately:

Utilizing the methodology laid out in our Quality Management Plan, our QI department tracks and evaluates internal processes to ensure services being delivered across all of our family of companies are dedicated to each population they serve, and in compliance with the various state, federal, and managed care organization regulatory environments in which we work, to include contractual requirements. The QI team performs ongoing monitoring of new member enrollments, worker hiring, payments for vendors, goods, and services, ongoing program compliance with rules and regulations, and various other internal programmatic controls. Our improvement plans leverage requirements, data, and feedback to evaluate trends and implement improvements wherever possible.

In addition to internal reviews, the QI department utilizes compliance tools, form reviews, and satisfaction surveys as key indicators of performance. Several compliance tools utilized, as a part of our Performance Improvement Plan. Consumer Direct will work closely with our QI

department to incorporate performance objectives and measures stipulated by the Bureau, and will include them in our reporting for the Bureau as necessary. An ongoing review of required data allows Consumer Direct to continually improve its overall performance both in existing and new companies. Consumer Direct's QI department will be responsible for the final drafts of all member and worker enrollment packets and ongoing documentation. The QI team will also work with other Consumer Direct departments such as F/EA FMS, claims, and payroll to guarantee respective files meet all current company, state, contractual, and federal requirements.

4.2.6 The Vendor should prepare a Transition Plan that addresses when/if the Vendor is ending its contract with the Bureau and no longer will provide Subagent - F/EA FMS and RC services to the Bureau and the functions/forms to be closed out by the Vendor and are transitioning to a new Vendor, giving the Bureau for Medical Services at least sixty (60) calendar days' notice.

We recognize the value of a seamless transition wherein reliable customer service and timely payroll are top priorities.

We commit to maintaining adequate staffing in our Customer Service Center, and in our West Virginia office throughout the full duration of our contract agreement with the Bureau. The transitional phase to a new incoming F/EA and RC Subagent will be treated as a standard operational phase in regards to performance and quality metrics. In the event Consumer Direct no longer holds the contract for delivery of F/EA FMS and RC for the Bureau's HCBS programs, we will in no way reduce staffing or lower our standards for delivery of services in this proposal. We also expect the Bureau and other partners to hold us accountable for continuing to offer support to both existing and new members and DCSWs until the very last member and DCSW is transferred to the incoming Subagent.

We appreciate state procurement cycles and recognize that even with delivery of excellent customer service and reliable payroll, vendors or contractors sometimes change. Our recognition of this common requirement in no way shifts the manner in which we deliver our services. We will continue to adequately staff all aspects of our operations in West Virginia in the event we are not selected to continue to provide F/EA FMS and Resource Consulting, both because it is the right thing to do for members, and because our reputation as a nationally recognized collaborative provider is important for us to maintain.

During the transitional phase we will comply with all turnover deliverables and requirements as set forth in this proposal. Consumer Direct operations throughout this phase will remain unchanged for members and DCSWs. We expect to be held accountable both internally and externally by the Bureau to meet all turnover requirements and all deliverables, and for continuing to provide members and workers, as well as any newly enrolling members, with customer service to the satisfaction of members, workers, and the Bureau. All turnover activities and operations will continue until the complete transition of F/EA FMS services to the incoming F/EA FMS.

4.2.7 The Vendor should ensure that all RCs are current Notary Publics.

All Consumer Direct RCs will be qualified Notary Publics. We understand certain West Virginia tax forms require notarization by a Notary Public and will ensure that all RCs obtain required certification.

4.3 The Vendor should maintain systems, policies and internal controls that comply with [Bureau of Medical Services, Chapter 600](#) (Appendix 4), Reimbursement, and Methodologies of the West Virginia provider manuals. The Vendor has thirty (30) calendar days to correct any discrepancies or reimburse the Bureau of overpayments/underpayments, if any, and detail the credit on the next submitted claim.

Consumer Direct will comply with the requirements specified in the BMS Provider Manual, Chapter 600, Reimbursement Methodologies. Our payroll and billing systems apply the necessary West Virginia-specific business rules and policy requirements programmatically to all services delivered in order to ensure authorized services are delivered to eligible participants in the proper amount, scope, and duration. Approved claim transactions are prepared in the system, following fee schedule specifications, and transmitted to the MMIS via a HIPAA EDI 837 transaction. Any overpayments that occur (due to rate/eligibility errors or upon audit findings, for example) are processed via a direct check or claim adjustment transaction within thirty (30) days of identification by Consumer Direct.

4.4 The Vendor should provide additional services to comply with externally driven changes to Bureau Programs and requirements, including any state or federal laws, rules, and regulations. Services provided by the Vendor may include assistance with policy development impact analysis, requirements definition and testing activities that require substantial subject matter expertise derived from experience in other states, other healthcare organizations or participation in federal activities. Provide implementation support as requested.

It is our standard operating procedure to closely monitor changes at the federal or local level that might affect our service delivery on any level, to include labor, tax, employment, and workers' compensation laws. We invest time with our policy research, legal research, and local program staff to be sure we understand and interpret relevant changes with accuracy. Once definitive impacts to our operations or service delivery are clearly identified, we integrate necessary procedural and policy changes into our ongoing operational protocol through our operations, programs, and quality improvement teams. We seek outside legal counsel in scenarios wherein we are unclear how to interpret or respond to a regulatory change. We have set processes in place for policy change absorption, clarification and research, and dissemination to operations and program teams, who oversee policy manual changes, communications to members, and other aspects of incorporating new policies.

We also work to understand policy changes related to FMS through use of the expertise of Applied Self Direction (ASD), which is the technical assistance (TA) and research arm for FMS entities across the nation. ASD was formerly a part of the Boston College National Resource Center for Member-Directed Services (NRCPDS), also a nationally recognized research and TA partner for FMS agencies. We utilize our relationship with ASD to remain up to date with labor laws and public policy related to FMS. In addition, we work closely with state advocacy and provider associations for more focused policy guidance when possible. When necessary, we consult with attorneys for guidance on specific topics related to the self-directed employment model.

4.5 The Vendor should prepare and maintain a West Virginia-specific, Comprehensive Subagent-F/EA FMS and Resource Consulting Policies and Procedures Manual that documents the systems, policies, procedures, and internal controls used to perform and monitor the effectiveness of all the Subagent-F/EA FMS and Resource Consulting functions and tasks in

West Virginia. The Manual should be submitted in both paper and electronic formats to the Bureau for review and approval thirty (30) calendar days prior to implementing Subagent-F/EA FMS and RC services.

We follow and implement changes in regulations, procedures, and forms at the federal, state, or local level including those for tax, labor, immigration, and funding source. Changing labor laws both at a federal level, imposed by the Department of Labor (DOL), and at the state and local levels are monitored by our policy analyst. When regulations change, our analyst disseminates relevant information to our operations and quality improvement teams. Upon receipt of notification, these program personnel update associated manuals and processes to reflect the newly updated regulation, policy, or law. Bureau review and approval will be requested thirty (30) calendar days prior to implementing any F/EA FMS and RC services.

In addition to the outlets noted above that ensure we are current regarding relevant policy and regulatory changes, we commit to connecting with local provider associations and/or advocacy organizations in the event we are awarded the opportunity to serve as the FMS. In new states in which we operate, our local program staff are required to be as connected as possible to their communities. We look forward to integrating ourselves in West Virginia and supporting members and their DCSWs in ways relevant to any HCFA, Bureau, DIDD, legislative, labor, or workers' compensation changes they may experience throughout the course of their utilization of Bureau or self-directed programs.

We have prepared a sample draft policies and procedures manual for West Virginia's Subagent-F/EA FMS and Resource Consulting service delivery. In preparing this sample draft manual, we draw from best practices and successful program operations with other states. We look forward to incorporating the Bureau's feedback on existing best practices to create a dynamic and responsive policies and procedures manual for our work with this program.

See Appendix B, Sample Base Policies and Procedures Manual for F/EA FMS and Resource Consulting.

4.6 The Vendor should apply for and receive approval from applicable Federal and State agencies to act as the Subagent to the Bureau (as Government F/EA FMS) and to members/representative-employers in the ADW, IDWW and TBIW programs as well as participants in TMH. To do so, the Vendor should have a system in place and written policies, procedures, and internal controls to complete the following tasks:

We are familiar with required forms and processes that must be in place for an F/EA to become fully operational as the fiscal agent for Common Law Employers (members) at the state and federal levels. We have reviewed, and are able to comply with, all requirements set forth in the scope of this procurement. Consumer Direct will be prepared to do business in West Virginia, including obtaining a separate agent Federal Employer Identification Number (FEIN) for reporting on behalf of employers in West Virginia.

Our payroll team has identified specific forms required in West Virginia for F/EA operations regarding workers' compensation, unemployment, power of attorney, or any other business-related forms that might be required on behalf of self-directing members. As part of the transition, our payroll staff will incorporate all West Virginia-specific forms into member enrollment and tax filing processes. This includes, but is not limited to West Virginia Forms

2848, Authorization of Power of Attorney informing the West Virginia State Tax Department that the member/representative-employer authorizes the Subagent-F/EA FMS to receive and sign the tax forms listed relative to state income tax withholding and unemployment insurance taxes.

4.6.1 The Vendor should use its own separate Federal Employer Identification Number (FEIN) (FEIN in addition to its corporate FEIN) to file IRS Forms and deposit Federal taxes.

If awarded this contract, Consumer Direct anticipates receiving the FEINs and other pertinent account information for currently enrolled members from the incumbent Subagent. We will obtain IRS Form SS-4, Application for Employer Identification Number for all newly self-directing members. During the transition, we will work closely with the incumbent F/EA FMS to transfer all relevant information regarding participant FEINs and related tax information as efficiently as possible to provide participants and workers with a seamless transition.

Consumer Direct will receive written agent authorization from the IRS to be the agent for each participant/representative-employer we represent through the receipt of an IRS LTR 1997C, Notice of Appointment, for each participant/representative-employer. We will maintain a copy of the IRS LTR 1997C, Notice of Appointment and related correspondence in the participant's secure electronic file.

4.6.2 The Vendor should describe their plan/process to execute an IRS Form 2678, Employer/Payer Appointment of Agent, with the Bureau (Government F/EA FMS agency) per IRS instructions.

Consumer Direct will obtain IRS Form 2678, Employer/Payer Appointment of Agent, during the enrollment and will use a Fiscal Vendor Agent FEIN for the sole purpose of filing IRS Form 2678, other federal employment tax forms, and making federal payments on the member's behalf. Consumer Direct will then submit a 2678 to receive approval to act on behalf of those members transferring to us.

If Consumer Direct has enrolled a member as an employer, and then no longer represents that member as their F/EA for payroll services, we revoke IRS Form 2678 by filing Form 2678 with the IRS to revoke the Appointment of Agent. Upon completion of filing, Consumer Direct staff scan and maintain the form to the member's electronic file with any other resulting documentation.

4.6.3 The Vendor should execute an IRS Form 8821, Tax Information Authorization with the Bureau (Government F/EA FMS agency).

Consumer Direct will file IRS Form 8821, Tax Information Authorization, if we are unable to obtain an employer's previously assigned FEIN. Form 8821 is obtained in exceptional situations where a prior EIN is unobtainable by other authorized means. Form 8821 is scanned into the member's electronic file. We will maintain copies of renewed IRS Forms 8821 in the member/representative-employer's file.

4.6.4 The Vendor should renew the IRS Form 8821, Tax Information Authorization with the Bureau (Government F/EA FMS agency) periodically per IRS instructions.

We will renew each member/representative-employer's IRS Form 8821 on a periodic basis as per Form instructions. We will maintain copies of renewed IRS Forms 8821 in the member/representative-employer's file.

4.6.5 The Vendor should describe their plan/process to execute an IRS Form 2678, Employer/Payer Appointment of Agent between the Bureau (Government F/EA FMS agency) and each member-employer and retain the executed Form in the member-employer's file at the Vendor's location.

Consumer Direct will obtain IRS Form 2678, Employer/Payer Appointment of Agent, during the enrollment and will use a Fiscal Vendor Agent FEIN for the sole purpose of filing IRS Form 2678, other federal employment tax forms, and making federal payments on the member's behalf. Consumer Direct will then submit a 2678 to receive approval to act on behalf of those members transferring to us.

If Consumer Direct has enrolled a member as an employer, and then no longer represents that individual as their F/EA for payroll services, we revoke IRS Form 2678 by filing Form 2678 with the IRS to revoke the Appointment of Agent. Upon completion of filing, Consumer Direct staff scan and maintain the form to the member's electronic document management file with any other resulting documentation.

4.6.6 The Vendor should facilitate the execution of an IRS Form 8821, Tax Information Authorization between the Bureau (Government F/EA FMS agency) and each member-employer with a Vendor's staff reported as a second appointee on the Form and maintain a copy of the executed Form in the member employer's file.

On the occasion when IRS Form 8821, Tax Information Authorization, is required because the member-employer's previously assigned FEIN is unattainable, we will obtain Form 8821. Form 8821 will be scanned into the member's electronic file. We will maintain copies of renewed IRS Forms 8821 in the member/representative-employer's file.

(4.6.7 is left out as per RFP)

4.6.8 The Vendor should facilitate the execution of an informed consent statement between the Bureau (Government F/EA FMS agency) with each member/representative-employer acknowledging the member/ representative employer knows the Government F/EA FMS agency is using a Subagent, the tasks the Subagent is performing and that the member-employer agrees with it.

During enrollment, Consumer Direct will explain the role of Consumer Direct as the Subagent, the tasks we perform in this role, and how the member and his or her employee is impacted by our role as the Subagent. With the understanding of the member/representative, we will direct the member/representative to the informed consent statement for their approval and signature. The signed informed consent statement will be maintained in the member's secure electronic file.

4.6.9 The Vendor should file a West Virginia Forms WV-ARI-001, Authorization to Release Information authorizing the West Virginia State Tax Department to release Information to the Vendor regarding the member/representative employer's West Virginia state income tax withholding tax and unemployment tax to the Subagent-F/EA FMS.

During enrollment, Consumer Direct will facilitate collection of West Virginia Form WV-ARI-001, and will file with the West Virginia State Tax Department for authorization from the member-representative to allow the State Tax Department to release information to Consumer Direct regarding the member/representative-employer's WV state income tax withholding and unemployment tax withholding.

4.6.10 The Vendor should file West Virginia Forms 2848, Authorization of Power of Attorney informing the West Virginia State Tax Department that the member/representative-employer authorizes the Subagent-F/EA FMS to receive and sign the tax forms listed relative to state income tax withholding and unemployment insurance taxes.

Consumer Direct will file IRS Form 8821, Tax Information Authorization, to receive an employer previously assigned an FEIN if we are unable to receive Form SS-4. Form 8821 is obtained in exceptional situations where a prior EIN is unobtainable by other authorized means. Form 8821 is scanned into the participant's electronic file.

It is current practice that Employer Enrollment Packets contain forms outlining the particular responsibilities of the employer and of the member. Enrollment packets for West Virginia will include all appropriate forms, including a form seeking consent by the member/representative-employer acknowledging that they understand that West Virginia's Department of Health and Human Resources is using Consumer Direct as their Subagent and that Consumer Direct as the Subagent will be performing specific tasks related the member's employment of a DCSW(s).

The member enrollment packet will include Form 2848. Each member/representative will complete Form 2848A, identifying Consumer Direct as their agent. Our payroll department employs experts in tax law and legal research and will develop West Virginia-specific business rules, which we then incorporate into our West Virginia payroll process to ensure state income tax (SIT) withholding and unemployment taxes are withdrawn in the appropriate amounts from DCSW payroll.

4.7 The Vendor should have a web-based portal to which referrals and prior authorizations for medical services are issued by the State's Utilization Management Contractor to request and receive referrals and prior authorizations for Medical services for members who have self-direction.

Consumer Direct provides web-based access to members' referral and prior authorization data. Access is established on a role-based basis, with permissions controlling the ability to read, write, and update information determined by an individual user's role and need-to-know. Roles such as case manager, and program/authorization administrator are typical of users needing access to this type of information. Access to the data and specific permissions can be provided to only approved external users.

Referral and prior authorization data is a vital part of administering a member self-directed program, and integral to properly processing service delivery transactions. That data must be current and accurate to ensure business rule processes are applied properly. Consequently, the ability to view and modify information in authorization records must follow a strict rule set – certain elements in the records may be viewed, some not; certain elements in the records may be changed, some not. Certain updates may require

additional processing or approval before being included in transaction processing workflows. All access and change is logged and audit logs are available for reporting.

The rules, methods, and framework for external user access will be developed to meet the specific needs of the State, based upon the principle of role-based access and business rule controls on the data.

4.7.1 The Vendor should enroll with the State's Utilization Management Contractor's system to input and obtain data regarding program members' medical eligibility, services, and other pertinent information.

Our billing department and claims managers will familiarize our billing staff with billing specifics for processing and management for the Bureau's F/EA and Resource Consulting services. We look forward to employing eligibility checks, authorization receipt and validation, and member information verification processes with West Virginia's Utilization Management Contractor.

We will submit all eligibility verifications, member information verifications, and additional secured communications in a format and frequency identified by the UM contractor. We are accustomed to adjusting and correcting claims, as necessary, on a timely basis and certainly within timely filing requirements as dictated by the Bureau. We recognize the necessity of confidentiality of PHI and HIPAA compliance for each of our participants and workers. As such, data is transmitted to and from the state agencies through secure FTP transmission. Electronic Data Interchange (EDI) services are hosted in one of our two data centers. More detail about our data backup system and disaster recovery is included in Appendix C, Business Continuity Plan. This Business Continuity Plan is in place for our work in Colorado. Upon award of contract in West Virginia, we will update the plan to West Virginia specifications.

EDI services are currently operational for various self-directing programs, and all EDI operations support the 837P/835 (claims) and 270/271 transaction (eligibility) sets. Our financial system processes time entries, whether input electronically or via paper timesheets, by applying a series of business rules to every transaction. All time entry and expense transactions are evaluated to certify: participant eligibility on the date of service; employee authorization to provide services, including all necessary certifications; authorization from the state/payer for the proper amount, duration, and frequency of services; and, services are within existing limits or caps. Consumer Direct processes services based on unit rates, hourly rates, encounter rates, or per-diem rates. Our portal and financial safeguards prevent duplication of time entered and duplication of payroll for any single hour worked.

Consumer Direct provides internet accessible websites to deliver a broad set of features and capabilities in a secure and HIPAA compliant manner to members, representatives, DCSWs, individual-directed goods and services vendors, waiver case managers, Resource Consultants and the general public. Access to information and services is based on each user's specific role. Consumer Direct provides a web-based portal to collect and share referral and prior authorization data, in addition to supporting online DCSW time entry, member time approval, task/note entry, and access to budget/spending reports. The site features an accessible and user-friendly format to access forms, share information about fraud prevention, and provide quick access to our work injury hotline. Current sites also offer an entry point to our provider directory as a recruitment tool for members, and we can

expand this option for the Bureau's self-directing members should the state desire this. We constantly monitor our sites to ensure they remain Section 508 compliant.

4.8 The Vendor should enroll with the State's claims system Medicaid Management Information System (MMIS), and obtain a West Virginia Medicaid Provider ID to submit claims electronically to the Bureau monthly through the State's claim system, MMIS, for Medicaid services rendered within one hundred eighty (180) calendar days of the date of service and in accordance with the member's spending plan and established service rate(s); and in accordance with the Bureau's billing and contract requirements and proper procedure codes. Billing should be in compliance with the 42 CFR part 447 including, but not limited to the requirements for timely payment to DCSWs, set forth in 42 CFR part 447 and 42 CFR § 447.453.10 (Appendix 5).

Consumer Direct is an experienced claims submitter and is familiar with the nuances of numerous MMIS structures. We have extensive familiarity and understanding in how to adapt our claims submission processes to meet different state's requirements. We submit more than 50,000 claims every week to more than 90 different payer systems in 14 states, each with their own unique billing requirements. With each new program we pursue, we understand that the best way to operate our business is to be prepared to adapt our current systems to each new payer source. We combine our expertise in claims submission and billing in order to effectively communicate with new payer sources. Our Claims department, as well as our Implementation and Quality Improvement (QI) teams, are fully prepared to translate this practice into the West Virginia's self-directed environment. To do this, we will direct resources and attention toward the provider enrollment process, establishing a collaborative relationship with the Bureau, and West Virginia's MMIS provider trainings to ensure we have an accurate and comprehensive understanding of what is expected of us in the claims submission process.

Upon notification of award of contract, we will begin the process to obtain a West Virginia Medicaid Provider ID, and will enroll with the State's MMIS.

4.8.1 The Vendor should submit claims to and receive payments from the State's claims system MMIS, for Medicaid service rendered to members and Subagent-F/EA FMS and RC administrative fees in compliance with Chapter 600 (Appendix 4) after services are rendered.

Consumer Direct will enroll as a Medicaid provider with the State's MMIS. Consumer Direct operates a custom financial processing platform to capture all service transactions, calculate and issue DCSW payroll, and calculate and issue claims to the MMIS. Transactions are captured and input to the Consumer Direct platform through a variety of methods: online entry, paper timesheets, or electronic visit verification. All service transactions are evaluated programmatically against a set of business rules unique to the West Virginia program. Only valid service transactions are processed for DCSW payroll and for billing to the State's MMIS. Claims are sent electronically to the MMIS via a HIPAA EDI 837 transaction; EDI 835 transactions are processed to recognize the MMIS adjudication. PMPM claims are prepared for eligible and verified participants and submitted to the State's MMIS for processing. All claims will be submitted within the Bureau's timely filing requirement of 180 days from the date of service.

4.8.2 The Vendor should submit PMPM claims to the Bureau through the State's Fiscal Agent for Subagent — F/EA FMS and RC administrative fees monthly (and within one hundred eighty (180) calendar days of date of service) in accordance with Chapter 600 (Appendix 4).

Consumer Direct will submit PMPM claims through the State's Fiscal Agent handling this contract. All claims will be submitted within the Bureau's timely filing requirement of 180 days from the date of service.

Our custom financial processing platform captures all service transactions, calculates and issues DCSW payroll, and calculates and issues PMPM claims to the Fiscal Agent. Transactions are captured and input to the Consumer Direct platform through a variety of methods, and all service transactions are evaluated programmatically against a set of business rules unique to the West Virginia program.

We can handle a broad range of transactions from manual processes to EDI.

4.9 The Vendor's administrative services should be delivered or billed only for members that have authorizations for the dates of service being billed. All services should be preauthorized on an annual basis or more frequently when members' needs change. Administrative services only for TMH participants can begin if authorized by the TMH office three (3)-months prior to transition to the community. Administrative services for the Waiver programs may not begin until the date of the member's enrollment meeting.

Consumer Direct manages every service delivery transaction from time entry through to claim payment. Our financial and accounting systems process time entry, whether input electronically or via paper timesheets, by applying a series of business rules to the transaction. All time entry and expense transactions are evaluated to ensure: member eligibility on the date of service; employee authorization to provide services, including all necessary certifications; authorization from the state/payer for the proper amount, duration, and frequency of services; and, services are within existing limits or caps. Consumer Direct processes services based on unit rates, hourly rates, encounter rates, or per diem rates. Our portal and financial safeguards prevent duplication of time entered and duplication of payroll for any single hour worked. Our internal processes for monitoring time entry are outlined in the Payroll Process graphic here.

Consumer Direct delivers and bills for member services only when the service is covered by an authorization issued by the State, and when all business rules for the service have been met. Business rules are applied programmatically throughout the processing of service transactions, and evaluate the service delivery specifics (date/time of service, service provider, member served, type of service, etc.) against the established authorization information. Only valid services are paid and billed to the State.

4.10 The Vendor should establish and convey their rules and requirements for payroll and invoice payment and develop a rules-based system (i.e., compare its "rules" for paying for individual-directed goods and services to an actual invoice to determine if the purchase(s) was completed).

Payroll Processing

We maintain approximately 140 different HCBS contracts in 14 states with over 90 payer sources, and we process over 330,000 paychecks annually, generating a projected \$268 million in revenue reflecting 6 million employee shifts. We are confident our systems have capacity and accuracy to fulfill the particular tax deductions and payroll cycles requested by this procurement.

Time submitted through the portal or via paperwork is processed against program specific business rules for accuracy and compliance with Medicaid and state regulations. State and local labor and industry regulations will be incorporated into the entire time capture process for all DCSWs and locally based Consumer Direct employees. Copies of all payroll related documents will be maintained in DCSW and administrative employee files.

Consumer Direct sustains the business operations and controls, and manages every service delivery transaction from time entry through to claim payment. It also provides the platform for accurately paying DCSWs on their specific pay cycle.

Our financial system processes time entry, whether input electronically or via paper timesheets, by applying a series of business rules to the transaction. All time entry and



Figure 2: Timesheet Submission

expense transactions are evaluated to ensure: member eligibility on the date of service; employee authorization to provide services, including all necessary certifications; authorization from the state/payer for the proper amount, duration, and frequency of services; and, services are within existing limits or caps. Consumer Direct processes services based on unit rates, hourly rates, encounter rates, or per diem rates. Our portal and financial safeguards prevent duplication of time entered and duplication of payroll for any single hour worked. Our internal processes for monitoring time entry are outlined in the Payroll Process graphic here.

When timesheet issues are identified, the Customer Service Center contacts the member and DCSW to ensure the issues are resolved timely so the timesheet can be submitted for payment.

Invoicing

Because we operate in a high-volume transactional environment, many processes and methods are conducted programmatically. Our backend systems are set-up to accurately capture and maintain information on members and DCSWs, program rules and guidelines, and service delivery specifics to make preparation of a clean claim possible and repeatable. Our automated business rules engine

evaluates every service delivery transaction against 60+ processing rules, tuned to the specifics of the Bureau's program via configurable settings.

Though we strive to achieve a zero defect rate with claims and invoices, problems do occur. Our systems programmatically issue claims and process remittances, allowing knowledge workers to focus on exceptions and make the needed adjustments in the backend systems to allow correct billing to proceed as quickly as possible. These corrective actions involve a host of activities, from system and programming adjustments to coordinating and improving information exchanges with the Bureau.

Ongoing claims processing operations and transaction flows are monitored continuously through 30 key performance indicators to detect problem situations at the earliest possible moment. The rich set of data generated in the system is vital to understanding the efficacy of the claims processing experience and highlighting areas for efficiency improvements.

4.11 The Vendor should be prepared to bill each Managed Care Organization (MCO) based on member enrollment for services rendered at such time as the State moves into a Medicaid managed long-term care system.

Our billing, claims, and accounting teams are well versed in adapting the claims submission processes to a number of state and MCO payer systems. We submit more than 50,000 claims every week to more than 90 payers in 14 states, each with their own unique billing requirements. With each new program we pursue, we understand that the best way to operate our business is to be prepared to adapt our current systems to each new payer source. We leverage our expertise in claims submission and billing to effectively communicate with new payer sources and understand the unique requirements and processes necessary to administer the program. Our Claims department, as well as our Implementation and Quality Improvement teams, are fully prepared to translate managed care organizations' requirements to the business rules and processing methods needed to accomplish the State's objectives. To do this, we will direct resources and attention toward the worker enrollment process and Bureau relations to ensure we have an accurate and comprehensive understanding of what is expected of us in the claims submission process.

4.12 The Vendor should have billing information that contains current member and service information.

Consumer Direct maintains current and historical member and service information in its processing systems. Data files maintain current information, as well as historical information, distinguished by the effective dates to which it applies. Doing so enables the effective processing of service transactions based on the date of service, using the data that was in effect at that point in time.

For each new program we operate, our FEA, Authorizations, and QI teams work together in shepherding new participant enrollment paperwork and establishing participant authorization or budget. Member enrollment packets are pre-populated with accurate participant information based on the authorization or budget information we obtain from the MCO or the Bureau upon referral of the member. The pre-filling of the forms helps to improve the accuracy of the forms and the efficiency of the form portion of the enrollment and orientation.

When changes to member information are received from the MCO or the Bureau, the information follows the same path and is immediately updated in our CRM. These changes

are reflected in the portal and participants and workers will only be able to enter time and verify time for the now-updated authorized services.

Use of our portal is a benefit for all authorized users as it provides immediate, real-time access to updated information about member status, DCSW status, services performed, and authorization status. MCO and Bureau personnel may also be authorized to access real-time spending reports. One such spending summary allows authorized users to see and analyze what workers are using by tracking how much a member spends per service date with relevant tax information.

As is our standard operating procedure, we will maintain copies of all documents and forms relating to worker employment in each DCSW's electronic file. Paper timesheets or electronic time submissions are also maintained electronically.

4.13 The Vendor should ensure that billing records support the amounts Medicaid services claimed on the Health Insurance Portability and Accountability Act (HIPAA) electronic claim form.

Claims submission is based directly off of time entered and business rules ensure both claims and time entered stay within authorization or budgetary limits. All time entry and expense transactions are evaluated to certify: participant eligibility on the date of service; employee authorization to provide services, including all necessary certifications; authorization from the state/payer for the proper amount, duration, and frequency of services; and, services are within existing limits or caps. Consumer Direct processes services based on unit rates, hourly rates, encounter rates, or per-diem rates. Our portal and financial safeguards prevent duplication of time entered and duplication of payroll for any single hour worked.

Consumer Direct generates electronic claims directly from the billing records that passed business rule processing.

4.14 The Vendor should ensure that the amount claimed does not exceed the member's approved Spending Plan and specific service rates and should have a system for how over billing occurrences will be addressed.

All claims submission is linked directly to time entered. Prior to time entry, our authorizations and data entry teams upload each member's allotted services, units, or dollars into our accounting system and the member's electronic profile. Consumer Direct's web portal follows business rules and prevents time being entered when outside of allotted services or hours. Business rules are run in real time, checking for service authorization, available budget, participant and worker eligibility, and approved pay/bill rates. Time entry is subjected to the unique business rules for the particular program and payer involved. These workflows can be complex, and business rules can dictate any number of things, such as requiring task information by shift, or applying plan-of-care constraints. The goal in the time entry/approval process is to optimize the accuracy and security of the transaction in an easy-to-use interface.

Transactions that fail a certain business rule, such as the budget authorization check, can be suspended for further evaluation (increase the member budget or resolve a budget issue) or denied for further processing.

4.15 The Vendor should have a process in place for reconciling Medicaid services paid to units billed.

Service delivery transactions form the basis of a claim for submission to a payer for every program we operate within. Consumer Direct has automated the claims workflow, enabling programmatic processing of claim information, including claim preparation, claim submission, payment processing, remittance processing, claim posting, adjustment processing, and management reporting.

Reconciliation of the end-to-end service delivery process is a continual process across our financial systems. We reconcile all time and expense transactions to a submitted claim, and then to a paid claim. We will work with the Bureau's MMIS and respective MCOs to reconcile service authorizations we receive containing participant information to the Bureau's MMIS to ensure information is kept on file and included in claims submission fields are accurate. In the event we are awarded the contract, we will formulate an efficient and clear communication system for our staff to correspond with MMIS contacts, case managers, and the Bureau in the event the initial service authorization does not match the referral information we receive.

The reconciliation process leverages electronic data interchange (EDI) technology to the extent possible with every payer entity in our network. We process thousands of HIPAA compliant EDI transactions on a daily basis, including the EDI 270/271 transaction set (eligibility inquiry), the EDI 837P/835 transaction set (claims submission and remittance), the EDI 276/277 transaction set (claim status and notification), and the EDI 997 transaction set (acknowledgement). EDI results are processed across the financial management systems, including interfaces to the web portal and the CRM system.

4.16 The Vendor should resubmit any suspended or denied claims for Medicaid services, as appropriate, within three hundred sixty-five (365) calendar days from the date of service in accordance with the Bureau's billing requirements.

Consumer Direct tracks the aging of all claims to ensure all claims are processed in accordance with timely-filing requirements and will resubmit claims as appropriate.

4.17 The Vendor should have a process for determining when a member is admitted to a nursing facility, hospital, or Intermediate Care Facility for Individuals with Intellectual Disabilities (ICF/IID) and the length of stay.

Our process for determining an admitted member's length of stay starts with the check box and attestation on their timesheets and there is also a switch on the portal to block time entry during a hospitalization period. We are also happy to coordinate an additional approach with the State if an expedited communication of a hospitalization period can be achieved.

4.18 The Vendor should ensure that it has not billed the Bureau if notified of a member's stay in a nursing facility, ICF/IID facility or hospital, except for participants of the TMH, West Virginia Program approved by the TMH Office for Pre-Transition Resource Consulting services.

The Consumer Direct web portal blocks time entry for non-covered/hospitalization periods that have been identified and recorded. Without time entry, no billing will occur.

4.19 The Vendor should have a process for reconciling hours of services billed and paid.

Consumer Direct submits all claims via the standard HIPAA EDI 837 transaction, based on claim data maintained in the processing system. All HIPAA EDI 835 processing results are posted to the originating transaction in the system. Consumer Direct can programmatically report on the disposition of any claim transaction, the specifics of what was billed and when it was billed, and the disposition of the MMIS processing (in-process, suspended, amount paid, or amount denied).

4.20 The Vendor should have a process for billing the member or representative - employer directly when any established service limit is exceeded.

Consumer Direct can bill members or representatives for services and goods provided above authorized amounts (when the State allows it), and for services and goods not covered by the State but obtained by the member under separate agreement. Over-budget situations are minimized or eliminated through careful monitoring of each member's budget and utilization, and through programmatic application of business rules in the service delivery lifecycle. For example, over-budget service episodes can be prevented prior to their delivery through notice to the member that budget limits have been reached for a specific timeframe. Services submitted that create an over-budget situation can be suspended for processing, and partially paid or even denied for payment. In these cases, the need for billing the member for over-budget services is controlled and minimized.

4.21 The Vendor should have a process for monitoring the filing and payment of FICA, FUTA/SUTA paid for each DCSW by the employer when applicable exemptions apply (i.e., certain DCSWs may qualify for difficulty of care or qualify as a foster care or supportive living provider and be exempt from paying federal and possibly state income tax withholding, certain family members who are paid DCSWs may be exempt from paying into FICA and/or FUTA/SUTA. The State also may be subject to the United States Department of Labor FUTA Credit Reduction process, or some DCSWs may not meet the applicable FICA and/or FUTA wage thresholds. If so, they may reduce the rate billed to the State Fiscal Agent).

Consumer Direct computes, withholds, files, and tracks Federal income tax withholding, Medicare and Social Security Taxes (FICA) for members and their employees. Consumer Direct timely files IRS form 941, Employer's Quarterly Federal Tax Report and the IRS Form 941, Schedule R in the aggregate using the assigned FEIN as the FEA for the member. Additionally, Consumer Direct is a semiweekly schedule depositor and files IRS Form 941, Schedule B. Copies of all Forms filed and deposit verifications are maintained in Consumer Direct's electronic payroll files.

Consumer Direct will run a report at year end to determine all DCSWs who did not reach the FICA threshold for \$2,000. All DCSWs under the \$2,000 threshold will be refunded the FICA taxes paid in at year end. The FICA taxes refunded will not be reflected on the annual W-2. Form 941X will be filed the following fiscal year to recoup the FICA taxes refunded. FICA deposit documentation on behalf of all members is maintained in our electronic files.

Federal FIT, FICA, and FUTA withholdings will be deposited on behalf of members in the aggregate using our separate FEIN obtained by Consumer Direct West Virginia. We will maintain copies of all filings in members electronic files.

We will work with the Bureau to determine if the process for determining which DCSWs may qualify for applicable exemptions for FICA and/or FUTA/SUTA.

4.22 The Vendor should have a one-time minimum reserve to pay for four (4) months of estimated service costs prior to the contract start date to account for retroactive payments from the Bureau for billed claims.

Consumer Direct has sufficient ability to incur four months of service costs at an estimated amount of \$12 million, in accordance with the Bureau's interest that there may be retroactive payments from the Bureau for billed claims during initial start-up months.

Consumer Direct maintains a powerful balance sheet with relatively small amounts of debt. Consumer Direct is projected to have revenues for 2017 and 2018 of \$268 million and \$313 million respectively. Consumer Direct also maintains a revolving line of credit with sufficient capacity to allow for continued operations should abnormal circumstances occur. Consumer Direct maintains its books in accordance with GAAP and has an annual audit performed by an independent third party in accordance with generally accepted auditing standards (GAAS).

4.23 The Vendor should ensure that a member is fully enrolled before billing Subagent - F/EA FMS and Resource Consultant services for any month.

Members will be fully enrolled before being billed for services for any month. We would advocate that the Bureau provide a clear definition of enrollment, since there are many stages of Resource Consulting support and assistance that members and workers may require leading up to full completion of enrollment for both the member and their workers.

4.24 The Vendor should not bill the Bureau in advance for participant-directed goods or services.

The Bureau will not be billed in advance for participant-directed goods or services. It is standard procedure that Consumer Direct approves and tracks the purchase of goods and services and tracks this as a part of the member's service authorization and budget.

In 2016, Consumer Direct successfully processed 12,366 payments for goods and services. Making any necessary adjustments to meet ALTSA DSHS specific requirements, we will implement proven processes currently in place for other programs throughout the country.

Funds approved for payment of goods and services are tracked against the member's budget and available 'real-time' via the CDCN portal, and receipts will be logged in member and vendor electronic profiles.

All requests are date stamped upon receipt. Our staff will review the request for completion and accuracy and cross-check that the item/service is authorized in the member's spending plan and funds are available. All requests, invoices, receipts or quotes will be maintained in the member's electronic file.

The invoices are processed by our data entry department where they are loaded into the accounting system. The natural integration into the accounting system ensures that all payments correspond to the correct plan upon payment.

Consumer Direct issues a check or an Electronic Funds Transfer (EFT) in the appropriate amount to the provider, and mail the check to the address indicated on the application. Vendor payment checks are processed weekly. Vendor Payment forms received by 5pm Monday will process the following Monday. Vendor payments are issued as a paper check and are sent via first class mail.

We reconcile goods and services paid to claims submitted, and submit our claims to the MMIS within 180 days of the date of service. We resubmit any suspended or denied claims rendered within 365 days of the date of service.

4.25 The Vendor should propose a plan to provide Subagent - F/EA FMS services with regards to claim submission and payments including a description of how these procedures assure payment of claims.

Consumer Direct will enroll as a Medicaid provider with the State's MMIS. Consumer Direct operates a custom financial processing platform to capture all service transactions, calculate and issue caregiver payroll, and calculate and issue claims to the MMIS. Transactions are captured and input to the Consumer Direct platform through a variety of methods: online entry, paper timesheets, or electronic visit verification. All service transactions are evaluated programmatically against a set of business rules unique to the West Virginia program. Only valid service transactions are processed for caregiver payroll and for billing to the State's MMIS. Claims are sent electronically to the MMIS via a HIPAA EDI 837 transaction; EDI 835 transactions are processed to recognize the MMIS adjudication. PMPM claim are prepared for eligible and verified participants and submitted to the State's Fiscal Agent for processing.

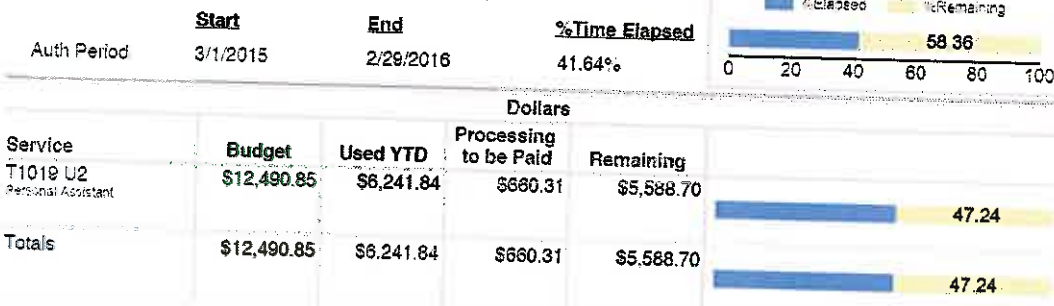
4.26 The Bureau should receive monthly utilization reports inclusive of claims and expenditure information that the contractor submits to compare monthly self-directed service expenditures to the amounts allocated in the member's budget. The Vendor should also make available reports for members and their representatives, as appropriate, that compares monthly self-directed service expenditures to the amounts allocated in the member's budget (for the month and cumulative). PC's are to review this report with members enrolled in self-directed service programs (ADW, IDDW and TBIW programs) and their representative, as appropriate, during their monthly telephone contact and six (6) month home visit.

Consumer Direct's Utilization Report, see below, will be provided a monthly account of claims and expenditure information that compare self-directed service expenditures to the amounts allocated in the member's budget.

Jane Doe
1234 Easy Street
Columbia, MO 65203

| | | |
|---------------------------|----------------------------|---------------------|
| Participant Number | Program Coordinator | Current Suta |
| 000000 | Meisner, Lori | Rate |
| Phone | External CM | 3.51% |
| (573) 555-5555 | | |

Missouri Medicaid - Missouri Dept of Mental Health - FEA



Please note the above values include employer costs. Processing to be Paid includes estimated employer costs. To calculate remaining available hours, employer costs must be included in the calculation. Please contact your Program Coordinator for further assistance.

Figure 3: Sample Spending Report

The Utilization Report will be available for members and their representatives to use in comparing monthly self-directed service expenditures to the amounts allocated in the member's budget by month and cumulatively, as appropriate. PC's will review this report with enrolled members and their representative, during their monthly telephone contact and six (6) month home visit.

Additional reporting information and samples is found in Attachment B: Mandatory Specification Checklist, item 5.17.

4.27 The Vendor should assist with the development and approve all self-directing members' spending plans including the purchase of participant-directed goods and services.

Consumer Direct assists with the development and approval of members' spending plans including goods and services. Consumer Direct will prepare and bill for expenditures disbursed based on the approved plan of care and spending; and will make refunds to West Virginia Medicaid as appropriate. Our real-time spending reports for members are available for member access 24 hours per day, 7 days per week on our online web portal. We commit that every report provided to members will contain the most updated information at the time the spending information is drawn directly from the portal.

Consumer Direct's accounting systems track expenses for each member's approved spending. We monitor performance by tracking DCSW timesheet reporting and spending in compliance with the member's spending and plan of care. In cases where our coordinator identifies non-compliant performance on the part of a member, the coordinator will follow-up with the member to determine where the challenges lie. We constantly monitor program compliance in order to identify and address needs for more training or an adjustment in program expectations.

4.28 The Vendor should establish and maintain an accounting and information system for receiving and disbursing Medicaid and other Federal funds and for tracking all transactions and balances.

Consumer Direct prepares and bills for expenditures disbursed based on the approved plan of care and spending; and will make refunds to West Virginia Medicaid as appropriate. The accounting system tracks the required spending and authorizations accurately. Our electronic document management system and a well-established accounting and information system for receipt and disbursement of Medicaid funds. We will adapt this system for use with the Bureau programs, and for tracking all transactions and balances.

4.29 The Vendor should propose a system and policies, procedures and internal controls to enroll each member choosing the Personal Options or his/her representative, as appropriate as an employer, including preparing the Employer Enrollment Packet and conducting quality control of the production of the Packet; assisting member representative-employers in completing the forms included in and providing the information requested in the Packet and collecting and processing the completed forms and information provided. The Vendor's system, policies, procedures, and internal control; should recognize the Vendor's understanding of all required forms by referencing each form within the proposal.

The Vendor's proposal should address, but, not be limited to, their understanding of the following processes or procedures:

4.29.1 Preparing the Employer Enrollment Packet and having an internal control for monitoring the quality of production. The Packet should include, but not be limited to:

4.29.1.1 Cover Letter.

4.29.1.2 IRS Form SS-4, Application for Employer Identification Number.

4.29.1.3 West Virginia Office of Business Registration Application.

4.29.1.4 IRS Form 2678, Employer Appointment of Agent.

4.29.1.5 West Virginia Forms 2848, Authorization of Power of Attorney. **4.29.1.6** IRS Form 8821, Tax Information Authorization.

4.29.1.7 West Virginia State Tax Department Electronic Funds Transfer Application.

4.29.1.8 West Virginia Subagent Consent Form,

4.29.1.9 West Virginia Forms WV-ARI-001, Authorization to Release Information.

4.29.1.10 Instructions for completion of all forms and provision of requested information.

4.29.1.11 Employer Enrollment Packet Checklist.

4.29.1.12 Self-addressed stamped envelope.

Consumer Direct will prepare an Employer Enrollment Packet including the forms listed in 4.29.1.1 to 4.29.1.12. The packet will be prepared with the assistance of the Quality Improvement team, who has experience generating similar packets for a broad range of programs.

At enrollment, Consumer Direct will provide the member with an enrollment packet that adheres to all requirements listed above. We will work with the outgoing vendor and the Bureau to ensure continuity of existing enrollment packets along with any improvements required by the Bureau. Resource Consultants will pre-populate enrollment packets with pertinent member/representative-employer demographic information to ensure the greatest

accuracy for completion. The Resource Consultant will provide timely and accurate technical assistance to members/representative-employers and DCSWs with completion of the forms.

Consumer Direct fully understands the operations and responsibilities of the F/EA. We will provide and maintain compliant systems, internal controls, and written policies and procedures for the tasks outlined in this section. Appendix B: Sample Base Policies and Procedures Manual for F/EA FMS and Resource Consulting is included here as the basis of how we will proceed in establishing a version for approval by the Bureau. We look forward to working with the Bureau to develop a manual that addresses all specific the Bureau requirements.

For an example of enrollment forms in use for a program similar to the F/EA FMS Resource Consultant program in West Virginia, we include Appendix D: Sample Partial Member Enrollment Packet. The complete packet can be found on the Consumer Direct District of Columbia site: <http://www.consumerdirectdc.com/forms/>

4.30 The Vendor should assist member/representative-employers with completing and submitting the required information and forms included in the Employer Packet as needed.

Consumer Direct assists member/representative-employers with completing and submitting all required information and forms included in the Employer Packet.

Enrollment packets will be discussed in detail during orientation, and members will receive ample information to guide them to online trainings and resources should they require such after the enrollment has concluded. Our Resource Consultants, as well as our Administrative staff, will be available and all materials will be available on the website should the member or the DCSW require ongoing training and ongoing access to refreshers. Our staff will also be available at any time along the way should either members or DCSWs have direct questions or concerns, or need additional assistance. All packet information and related program documents will be available on our website for 24/7 access. Members will be assisted with the completion of their enrollment/employment packets, both during the enrollment and ongoing, and packet information will also be made available on the Consumer Direct for West Virginia website. Employer packets will be pre-filled to the best of our ability based on demographic information or other information obtained from the referral source or member in advance of the enrollment or hiring process.

Throughout the enrollment meeting, members learn the process of hiring new workers, how to complete required forms, and how to explain their roles and responsibilities and train the worker. It is our goal to empower the members with knowledge, as well as to provide ongoing support to both parties in the employment relationship. At any time when a DCSWs is hired, either the member or DCSW can contact Consumer Direct for assistance.

4.31 The Vendor should collect and process information from the Employer Packet and file completed forms with the appropriate Federal and State agencies within two (2) business days of receipt of information.

Consumer Direct processes Employer Packet information and files completed forms with the appropriate federal and state agencies within two (2) business days of receipt of information.

The time requirement will be documented in our procedures on collecting and processing all required documentation when enrolling a member.

We also expediently complete DCSWs' employment paperwork, and begin the payroll process. Processes include collecting and processing an IRS Form W-4 and Form L-4, West Virginia Department of Revenue Employee Withholding Exemption Certificate. If W-4 or L-4 is received, we will also collect and process an IRS Form W-5 from each eligible DCSW who requires Federal Advanced EIC. We will maintain copies of these documents in the DCSW's electronic file.

Each DCSW will complete USCIS Form I-9 to verify the DCSW's citizenship or alien status. We will verify each DCSW's Social Security number. We will verify the state of residence for each DCSW by, at minimum, verifying their state-issued identification card. We will maintain copies of these documents in the DCSW's electronic file.

We will ensure that DCSWs are paid in compliance with Federal and State Department of Labor wage and hour rules for regular and overtime pay. We will consult with the Bureau to further understand and comply with the Bureau requirements while abiding by DOL rules, to ensure compliance. We will enable members to negotiate and pay different rates to different workers. We will report new hires per State requirements, and will comply with all the Bureau requirements. We will maintain copies of all documentation in the DCSW's secure, HIPAA-compliant electronic file.

Our document review team provides quality control when entering information received during the member enrollment, and when completing the DCSW employment forms. All documentation required during the enrollment process, before payroll can begin, is completed with the member and DCSW, with the assistance of the program coordinator, then double-checked through the document review team.

4.32 The Vendor should maintain copies of documentation in the applicable employer's file.

Consumer Direct scans and diligently maintains copies of Employer Packets and any documentation related to each member's self directed care in each member's respective electronic file.

4.33 The Vendor should notify the member/representative-employer regarding missing or incorrect information submitted from the Employer Packet and obtain it within thirty (30) calendar days.

Consumer Direct quickly notifies members/representative-employers of missing or incorrect Employer Packet information and obtain it within thirty (30) calendar days. When a Consumer Direct program coordinator enrolls a member, the coordinator scans and emails the completed enrollment packet to our centralized document review department. Upon receipt, a document review associate reviews all fields in the packet to ensure that the enrollment process has addressed all requirements. Each document review associate is assigned a particular state so that he/she is intimately familiar with the requirements and regulations. If the associate finds something missing or finds that something has been completed incorrectly, the coordinator is alerted to correct the document in question. Upon

completion of the enrollment, Consumer Direct will process the member's enrollment information.

4.34 The Vendor should file an IRS Form SS-4, Application for Federal Employer Identification Number and obtain a FEIN for each member/representative-employer per IRS procedures. The Vendor should maintain a copy of the Form and the member/ representative-employer' s FEIN in his/her file.

Consumer Direct will submit IRS Form 2678 and SS-4 for each individual to obtain an FEIN and establish Consumer Direct as the individual's agent for filing payroll reports. A copy of Form 2678 and Form SS-4 are maintained in each participant's electronic document management file. When the IRS Notification of Fiscal/Employer Agency Approval and the IRS Letter CP 575, IRS EIN Verification Letter are received by Consumer Direct, both are scanned and maintained in the participant's electronic file.

4.35 The Vendor should file the WV/BUS-APP, Business Registration, obtain employer account numbers for state income tax withholding and state unemployment insurance purposes and maintain copies of the Form and the account numbers in the member/representative-employer's file.

Consumer Direct will file WV/BUS-APP, Business Registrations, obtain employers' account numbers and maintain copies of forms and account numbers in the member/representative-employers' files. We obtain IRS Form 2678, Employer/Payer Appointment of Agent, as part of the enrollment process and use a Fiscal Agent FEIN for the sole purpose of filing IRS Form 2678, other federal employment tax forms, and making federal payments. We will also obtain IRS Form SS-4, Application for Employer Identification Number. Consumer Direct then submits IRS Form 2678 and SS-4 for each individual to obtain an FEIN and establish Consumer Direct as the member's agent for filing payroll reports. A copy of Form 2678 and Form SS-4 are maintained in each member's electronic document management file. When the IRS Notification of Fiscal/Employer Agency Approval and the IRS Letter CP 575, IRS EIN Verification Letter are received by Consumer Direct, it is scanned and maintained in the member's electronic file.

4.36 The Vendor should file with the municipality to register the member/representative as an employer, obtain the employer's account number and maintain copies of documentation and the employer account number in the member/representative-employer's file.

We will file with the municipality to register the member/representative as an employer, obtain the employer's account numbers scan and maintain copies in each member and their representative's electronic file.

4.37 The Vendor should have a system in place and policies, procedures and internal controls for processing DCSWs' human resource documentation and participant-directed goods and services providers' and vendors' information and input it into the Vendor's payroll and billing invoice payment system. Tasks/requirements of the Vendor include the following:

4.37.1 The Vendor should prepare the DSCW Employment and Participant-directed Goods and Services Provider and Vendor Engagement Packets; that includes, but is not limited to:

4.37.1.1 Cover letter.

- 4.37.1.2 Instructions for completing forms and providing information requested.
- 4.37.1.3 DCSW Data Form to collect personal and emergency contact information.
- 4.37.1.4 IRS Form W-4, Withholding Allowance Certificate and instructions.
- 4.37.1.5 West Virginia Form IT-104, West Virginia Employee Withholding Exemption Certificate.
- 4.37.1.6 US BCIS Form 1-9, Employment Eligibility Verification Form and instructions.
- 4.37.1.7 Medicaid Provider Agreement.
- 4.37.1.8 West Virginia Employment Agreement.
- 4.37.1.9 West Virginia DHHR Protective Service Check Form.
- 4.37.1.10 Application for pre-employment Criminal Background Check.
- 4.37.1.11 Permission form for pre-employment criminal background check.
- 4.37.1.12 Employee Training Verification Form.
- 4.37.1.13 Confidentiality Agreement acknowledging that the DCSW agrees to respect the privacy and confidentiality of members' protected health information.
- 4.37.1.14 DCSW time sheet and instructions.
- 4.37.1.15 DCSW timesheet due date and payday schedule.
- 4.37.1.16 Participant-directed Goods and Services Disallow List.
- 4.37.1.17 Application for Approval of Participant-directed Goods and Services if applicable).
- 4.37.1.18 Provider Service Agreement,
- 4.37.1.19 IRS Form W-9, Request for Taxpayer ID Number and Certification.
- 4.37.1.20 Participant-directed goods and services provider and vendor engagement information form (if applicable).
- 4.37.1.21 Participant-directed goods and services invoice format for submission of provider and vendor payment requests and instructions for submitting invoices for payment (if applicable).
- 4.37.1.22 Participant-directed goods and services provider and vendor invoice due date and payment schedule (if applicable).
- 4.37.1.23 Form to collect information for West Virginia New Hire Reporting Form requirement.
- 4.37.1.24 Form to collect required information to determine if:
 - 4.37.1.24.1 A family employee meets one of the criteria to be FICA and/or FUTA/SUTA exempt per Section 3 of IRS Publication 15.
 - 4.37.1.24.2 Qualifies for difficulty of care payments (i.e., exempt from Federal income tax withholding and possibly state income tax withholding).
 - 4.37.1.24.3 Qualifies as a foster care or shared living provider (i.e., exempt from Federal income tax withholding and possibly state income tax withholding).
 - 4.37.1.24.4 Application for direct deposit (optional).
 - 4.37.1.24.5 DCSW Employment and Participant-directed Goods and Services Provider and Vendor Engagement Packet Check List.

Consumer Direct will prepare DCSW Employment and Participant-directed Goods and Services Provider and Vendor Engagement Packets. These packets will include all required documents listed in 4.37.1 through 4.37.1.23, and, when necessary, 4.37.1.24.1-4.37.1.24.5.

We have extensive experience creating user-friendly and accurate enrollment packets. As we prepare to transition members and their DCSWs from the current F/EA vendor, our experienced program team will adapt the best features of the existing packets while we consult with the Bureau to determine where there is room for improvement in DCSW enrollment packets.

Consumer Direct employs established internal controls to assure completed and accurate member and DCSW information, along with West Virginia and Missoula-based administrative collaboration for ongoing reviews of enrollment information. All steps in the process help us to verify that the DCSW's electronic profile is developed in compliance with all state, federal, and local regulatory standards. We work through the enrollment process to verify all DCSW information prior to payment for services rendered against their budget, while maintaining local staffing availability and customer support for the member throughout the process to get them enrolled.

We will adapt and finalize the draft policies and procedures manual with Department staff to create a comprehensive F/EA FMS and Resource Consultant document to guide our work in West Virginia. This manual will be reviewed for accuracy by our Project Manager and accounting, payroll and QI departments as we collaborate with the Department. This draft is included as Attachment B, Sample Base Policies and Procedures Manual for F/EA FMS and Resource Consulting

For each new program we operate, our F/EA, authorizations and QI teams work together to establish new member enrollment paperwork, establish member FEINs, set up vendor payments, establish member budget information, and all other tasks required to establish a member in our systems.

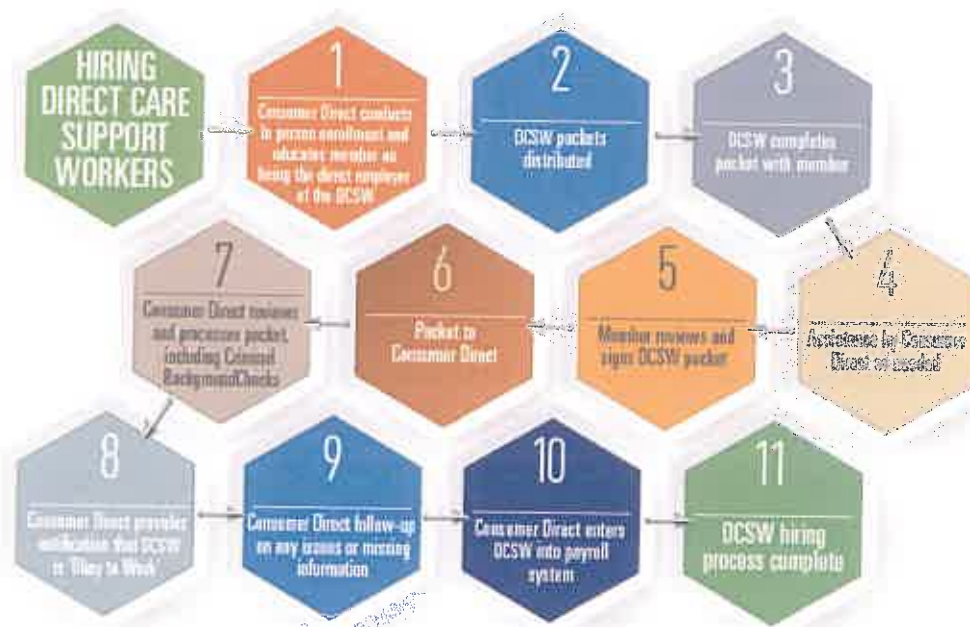


Figure 4: Hiring Workers Process

4.38 The Vendor should assist member/representative-employers with completing and submitting the required information and forms included in the DCSW Employment and Participant-directed Goods and Services Provider and Vendor Enrollment Packet, as needed.

Pre-filled employment packet for prospective DCSWs will be distributed within two (2) business days of referral. Worker packets are also available on-demand on every Consumer

Direct state-specific website. West Virginia members and DCSWs will have a unique West Virginia-program site where they can access packets at any time.

4.39 The Vendor should collect and process information from the DCSW Employment and Participant-directed Goods and Services Provider and Vendor Engagement Packets and file completed forms with the appropriate Federal and State agencies within five (5) business days of receipt of information.

Consumer Direct will process completed DCSW Employment and Participant-directed Goods and Services Provider and Vendor Engagement Packets with appropriate federal and state agencies within five (5) business days of receipt of information.

During the enrollment process, Consumer Direct will obtain a W-4 form indicating the DCSW's tax status and potential withholding exemptions. Additionally, we obtain an I-9 form indicating residency status and right to work legally in the United States. Information regarding potential Earned Income Tax Credits, state tax withholding forms specific to West Virginia, and necessary Unemployment Insurance and Workers' Compensation forms will also be provided to the worker in the hire packet. Standard operating procedure dictates that we withhold necessary federal and state taxes such as FICA, FUTA, or SUTA, including Medicare and Social Security taxes.

4.40 The Vendor should maintain copies of documentation in the applicable DCSWs' and participant-directed goods and services provider and vendors' files.

Consumer Direct relies on policies and procedures proven through our 27 year service history to establish and maintain documentation for tracking budgeted funds, verifying accuracy of timesheets, ensuring payroll accuracy, and monitoring billing.

Our CDCNportal.com allows for real-time viewing and monitoring of participant budgets, made available according to security and privacy specifications. Should we be awarded a contract, we will establish designated user contacts for our portal which enable viewing and monitoring of up-to-date utilization and expenditure information for members, payroll information for workers, and goods and services payment information. The portal is linked directly to our internal accounting and billing systems and is updated according to payroll for workers against the participant's budget. In addition to our online portal, the Consumer Direct 'back office' suite sustains the business operations and controls, and manages every service delivery transaction from time entry through to claim payment.

4.41 The Vendor should notify the member/representative-employer regarding missing or incorrect information submitted from the DCSW Employment and Participant-directed Goods and Services Provider and Vendor Engagement Packet and obtain it within thirty (30) calendar days of completion or submission.

Consumer Direct notifies member/representative-employers of missing or incorrect DCSW Employment and Participant-directed Goods and Services Provider and Vendor Engagement Packet information and obtains it within thirty (30) calendar days of completion or submission.

When a Consumer Direct program coordinator enrolls a member, the coordinator scans and emails the completed enrollment packet to our centralized document review department.

Upon receipt, a document review associate reviews all fields in the packet to ensure that the enrollment process has addressed all requirements. Each document review associate is assigned a particular state so that he/she is intimately familiar with the requirements and regulations. If the associate finds something missing or finds that something has been completed incorrectly, the coordinator is alerted to correct the document in question. Upon completion of the enrollment, Consumer Direct will process the member's enrollment information.

4.42 The Vendor should distribute and collect completed IRS Forms W-9, Request for Taxpayer ID and Certification within thirty (30) calendar days, when it is determined that a participant-directed goods and services provider or vendor is an independent contractor.

Consumer Direct distributes and collects completed IRS Forms W-9, Request for Taxpayer ID and Certification within thirty (30) calendar days of receipt.

4.43 The Vendor should process the DCSWs' IRS Forms W-4 Withholding Allowance Certificate and the West Virginia Forms IT-104, West Virginia Employee Withholding Exemption Certificate within thirty (30) calendar days.

Consumer Direct will process DCSWs' IRS Forms W-4 Withholding Allowance Certificates and West Virginia Forms IT-104, West Virginia Employee Withholding Exemption Certificates within thirty (30) calendar days.

4.44 The Vendor should maintain copies of the IRS Forms W-4 and West Virginia Form IT104, when applicable, in each DCSW's file.

Processes include collecting and processing an IRS Form W-4 and Form L-4, West Virginia Department of Revenue Employee Withholding Exemption Certificate. If W-4 or L-4 is received, we will also collect and process an IRS Form W-5 from each eligible DCSW who requires Federal Advanced EIC. We will maintain copies of these documents in the DCSW's electronic file.

4.45 The Vendor should collect and maintain copies of the US BCIS Form 1-9, Employment Eligibility Verification Form in each DCSW's file.

Answer to 4.45 is incorporated in 4.46 below.

4.46 The Vendor should execute a Medicaid Provider Agreement with DCSWs and a Provider Service Agreement with providers/vendors of authorized individual-directed goods and services. The Vendor should maintain copies of these documents in the DCSWs' and providers'/vendors' files.

Consumer Direct collects and maintains electronic copies of all employment files including US BCIS Form 1-9, Employment Eligibility Verification Form in each DCSW's file. We will execute a Medicaid Provider Agreement with DCSWs and a Provider Service Agreement with providers/vendors of authorized individual-directed goods and services. The Vendor should maintain copies of these documents in the DCSWs' and providers'/vendors' files.

4.47 The Vendor should participate in the West Virginia Clearance for Access: Registry & Employment Screening (WV CARES) program for the required documentation for fingerprint based state and federal criminal background checks for all DCSWs hired by the employer.

Consumer Direct will participate in WV CARES program for the required documentation for fingerprint based state and federal criminal background checks for all DCSWs hired by employers.

4.48 The Vendor should receive and maintain fitness determinations of criminal background check results from the WV CARES on DCSW candidates on file and provide results of the fitness determination to member/representative-employers.

We will receive and maintain fitness determinations of criminal background check results from the WV CARES on DCSW candidates on file and provide results of the fitness determination to member/representative-employer.

4.49 The Vendor should confirm each DCSW's social security number and providers' and vendors' FEIN, as appropriate, through the Social Security Administration's Business Services Online system.

Each DCSW's social security number and providers' and vendors' FEINs will be confirmed, as appropriate, through the Social Security Administration's Business Services Online system.

4.50 The Vendor should report member/representative-employers' new worker hires into the West Virginia New Hires Directory within twenty (20) calendar days of hire.

New worker hires will be reported into the West Virginia New Hires Directory within twenty (20) calendar days of hire.

4.51 The Vendor should maintain copies of West Virginia New Hire Reporting documentation in workers' files.

Copies of West Virginia New Hire Reporting documentation will be maintained in workers' electronic files.

4.52 The Vendor should provide member/representative-employer orientation and skills training in a culturally-sensitive manner and in accordance with the philosophy of self-direction, which supports empowering members and their representatives by expanding their degree of choice and control over the services they need to live at home, and vesting decision making and managerial authority in members/representative-employers.

Consumer Direct understands success in any self-directed program begins with comprehensive member/DCSW training. Whenever possible and practical, we believe in the value of face-to-face enrollments. We train our staff on person-centered planning and on program details upon hire and annually. Founded on the philosophy of self-direction, we believe that a higher degree of choice and control increases satisfaction and success for people with physical and developmental disabilities, older adults, and others who receive long-term services and supports in their homes and communities.

Our Resource Consultants, and all member-facing staff, are trained to understand the importance of the person-centered philosophy. We recognize that members and their families choose member-direction or self-direction so they may enjoy the greatest freedom to participate in their communities. We also help members understand that with that freedom comes greater responsibility for their personal care and supports.

For existing members who will transition to Consumer Direct from the previous FMS and/or Resource Consult, we will work with Bureau's existing communication procedures to seamlessly integrate into existing systems. We will adapt existing orientation materials for Bureau's approval and in compliance with West Virginia regulations. Upon examination of existing materials, we will assess and add information when we identify areas where the member may need additional support. We will submit to Bureau for approval.

We are accustomed to creating educational, outreach and enrollment materials in plain language that is easy to follow. In Florida, member-facing materials must be written at a 4th grade reading level. We will write enrollment instructions and other member-facing materials for user accessibility and friendliness. We find that most members, families and DCSWs respond best to a straightforward message, plainly said.

We are accustomed to providing all enrollment documents on state-specific websites. For instance, Consumer Direct Care Network Wisconsin has enrollment packets for both members and DCSWs available on their website (www.consumerdirectwi/forms/.com). Packets can be made available in both English and Spanish. We are also happy to mail a hard copy to a member or DCSW, free of charge, to their home or requested address.

Our websites are created to offer members, DCSWs, and all stakeholders a user-friendly website experience. We strive to maintain accessible, 508 compliant websites for users with disabilities or impaired vision. We have a designated staff member assigned to be responsible for nondiscrimination compliance.

4.53 The Vendor should have a member/representative-employer orientation process that uses a standard curriculum and materials that have been pre-approved by the Bureau. The orientation curriculum should include information reported in Section **4.54** below.

The member/representative-employer orientation process will use Bureau-approved curricula and materials that all information reported in Section 4.54 below. Materials are made accessible on our website for members to access in full, or in modular sections at any time. Our face to face enrollment meetings and in-home visits are designed to individualize each person's learning process to ensure that each Member/Representative gets the most out of his/her enrollment experience.

We understand that even when someone is ready to direct their own care, they may still require a bit of help getting started. Alongside the enrollment process, Consumer Direct staff are trained to work with members with varying types of abilities to adjust their services, hours, and staff members in order to meet the service levels they need, while remaining within the parameters of the program. We train all our employees on person-centered planning philosophies. Combined with their detailed knowledge of our local programming, our company provides members with the best enrollment experience possible. We will continue

to combine our person-centered philosophies with our expertise in Resource Consulting and bring our high standard of assistance to members.

4.54 During orientation, the Vendor should provide information on and review with member/representative-employer the:

- 4.54.1** Role and responsibilities of the member/representative-employer.
- 4.54.2** Role and responsibilities of the Vendor.
- 4.54.3** How the member/representative-employers can interact with Resource Consultants.
- 4.54.4** Subagent - F/EA FMS and Resource Consultant services provided.
- 4.54.5** Hours of operations.
- 4.54.6** Key contacts at the Vendor.
- 4.54.7** Toll free telephone, TTY, and fax numbers.
- 4.54.8** Member Bill of Rights.
- 4.54.9** Completing forms included in the Member/Representative Enrollment Packet.
- 4.54.10** Incident reporting process.
- 4.54.11** DCSW criminal background check process should be conducted in accordance with individual program policy.
- 4.54.12** Description of who can be a representative, how to determine when a member should have a representative and the role and responsibilities of a representative as specified by the Bureau.
- 4.54.13** Time frame and process for returning voice mail calls from members and representatives.
- 4.54.14** Completing forms included in the DCSW Employment and Participant-directed Goods and Services Provider and Vendor Engagement Packet.
- 4.54.15** Process for receiving and processing workers' timesheets including a schedule for timesheet due dates and paydays.
- 4.54.16** Process for disbursing DCSWs' payroll checks.
- 4.54.17** Process for purchasing approved participant-directed goods and services.
- 4.54.18** Other forms and agreements to be determined by the Bureau.
- 4.54.19** Process for purchasing approved participant-directed goods and services submitting invoices for payment schedule for invoice submission and payment.
- 4.54.20** Process for resolving issues and complaints.
- 4.54.21** Process for reviewing workplace safety issues and strategies for effective reporting and management and of workplace injuries.
- 4.54.22** Process for identifying and addressing members/representative-employer performance issues.
- 4.54.23** Process for completing and submitting the State's Notice of Worker Termination Form to the Vendor within twenty-four (24) hours of when a DCSW ceases working for the member/representative-employer for any reason so the Vendor can complete the Reason for Separation Notice for unemployment.
- 4.54.24** Process for conducting member/representative-employer satisfaction surveys.

Member enrollments will cover all information identified in sections 4.54.1-4.54.24 above.

The Resource Consultant will bring pre-populated Member Enrollment Packets to the in-person orientation. Contents of the packets will be discussed in detail during orientation, and members will receive all required information to guide them to our Customer Service Center, online trainings, and to contact the Resource Consultant again should they require additional support after the orientation has concluded. The resource consultant assigned to the

member will be available should the member require ongoing training and all materials will be available on the website for ongoing access to refreshers. The resource consultant will be supported by the appropriate waiver supervisor, the Project Manager, and administrative staff. Our staff will be available at any time along the way should either members or DCSWs have direct questions or concerns, or need additional assistance.

Consumer Direct Resource Consultants will assist members in understanding information identified above in sections 4.54.1-4.54.24. We assist members in understanding their roles and responsibilities as an employer during the face-to-face enrollment, and whenever members request in-person assistance. Resource Consultants and locally-based administrative staff will be available at any time should the member require additional information. All Bureau program information will also be housed on the Consumer Direct West Virginia website and any training materials will be housed in modules so members can access information at any time for training refreshers or to update their member or DCSW's forms.

For each new program we operate, our FEA, Authorizations, and QI teams work together in shepherding new member enrollment paperwork and establishing authorized services. Member Enrollment Packets are pre-populated with accurate member information based on the authorized plan or budget information we obtain from the Bureau upon referral of the member. The pre-filling of the forms helps to improve the accuracy of the forms and the efficiency of the form portion of the enrollment orientation.

When changes are received from the Bureau, the information follows the same path and is immediately updated in our CRM. These changes are reflected in the portal and members and DCSWs will only be able to enter time and verify time for the now-updated authorized services.

Use of our portal is a benefit for all authorized users as it provides immediate, real-time access to updated information about member status, DCSW status, services performed, and authorization status. Bureau personnel may also be authorized to access real-time spending reports. One such spending summary allows authorized users to see and analyze what DCSWs are using by tracking how much a member spends per service date with relevant tax information.

4.55 The Vendor should develop and implement an evaluation form and process for evaluating the effectiveness of the member/representative-employer orientation sessions.

We are accustomed to developing reports and forms which are particular to the programs we operate within. We will develop an evaluation form to the satisfaction of the Bureau which utilizes agreed-upon metrics to assess major milestones and overall outcome and completion of the orientation sessions. It is current policy that we assess member satisfaction with our service delivery on an annual basis, and we will work closely with the Bureau to develop additional mechanisms for assessing the satisfaction with our orientations, to be included within the Enrollment Packets and completed as part of the orientation process.

4.56 The Vendor should have a process for providing skills training to members/representatives-employers that use a standard curriculum and materials pre-approved by the Bureau. Skills training should include guidance on problem-solving and decision making;

performing employer tasks including the completion and submission of DCSW timesheets, Vendor and Bureau requirements; purchasing, using and paying for participant directed goods and services; recognizing and reporting critical incident events; monitoring self-directed services included in members' budget to ensure receipt of appropriate services; preparing and implementing corrective action plans as needed and developing and using risk management and emergency DCSW back-up plans and designation.

We have broad experience in orienting new members to the nature of self-direction and of operating as the employer of their workers. Particularly through our work in Colorado, the District of Columbia, Florida, Montana, and New Mexico we have created training materials and curricula for self-directed programs serving qualified older adults and people with disabilities. We value programs that allow us to combine both the training/orientation components (Resource Consulting) with the delivery of F/EA FMS, since this combination creates a more comprehensive system of support for members and their workers.

We have an intimate understanding of the commitment required to provide a layer of orientation and ongoing training for members and workers, and are fully capable of combining the two in an effort to be a more supportive partner for both. Moreover, we have long advocated for both the F/EA and some type of training services to be provided together in the interest of providing members with the most seamless member-directed service delivery experience, and are confident that our company can provide extremely high level of both services.

At minimum, Consumer Direct meets Americans with Disabilities Act standards for all enrollment materials either in paper or available via our website, but our standard practice is to exceed accessibility when possible. We maintain our training and orientation materials in various formats, and develop additional documents in various languages and formats as requested by members or workers. We strive to maintain all information accessible to members, families, and workers, and our program and customer service staff are trained to meet the highest expectations of accessibility at all times should additional needs arise.

Curriculum Reflective of Regulatory Environment

We will adapt existing orientation materials for the Bureau's approval and in compliance with West Virginia Statutes, Codes, and Medical Assistance Rules and Regulations. We are capable of adapting an existing curriculum for the Bureau's HCBS programs or creating our own. While the content will be standardized, we are accustomed to adding pieces when we identify areas where the member may need additional support.

Member Skills Training Content

Member Enrollment Packets and DCSW Enrollment Packets will be discussed in detail during orientation, and members and workers will receive ample information to guide them to online trainings and resources should they require such after the orientation has concluded. Our Project Manager and RCs, as well as our Administrative staff, will be available and all materials will be available on the website should the member or worker require ongoing training and ongoing access to refreshers. Our staff will also be available at any time along the way should either members or workers have direct questions or concerns, or need additional assistance.

Member Employer Packet Completion

Members will be assisted with the completion of their enrollment/employer packets, both during the orientation and ongoing, and packet information will also be made available on the Consumer Direct West Virginia website. Employer Packets will be pre-filled to the best of our ability based on demographic information or other information obtained from the referral source or member in advance of the enrollment or hiring process.

Face-to-Face Meetings

Consumer Direct Resource Consultants will assist members in understanding their roles and responsibilities as an employer in-person during the orientation meeting, or when members request in-person assistance. The RCs, locally-based Administrative staff, and the Customer Service Center will be available at any time should the member require additional information. All Bureau program information will also be housed on the Consumer Direct West Virginia website and any training materials will be housed in modules, so members can have access to the information on an ongoing basis for training refreshers or to update their member or DCSW forms.

Member Documentation

Our RCs will be trained on all documentation contained in the member Enrollment Packets and will be capable of walking members through their roles and responsibilities, as well as those of their workers. During the orientation, members will have an opportunity to ask any questions of our staff as they walk through the Member Handbook, the process for interacting with vendors and other providers of services, as well as the process for hiring and communicating with their workers. During the initial online, phone, or in-person meetings, members will be informed of all contact information for Consumer Direct and other relevant information needed for them to self-direct and access customer service at any time. Member Enrollment Packets and orientation curricula will also contain detailed information on paper/web timesheet submission processes and approval for workers.

All documentation specified in the RFP will be incorporated into the member Employment Packets and reviewed with the member during the orientation. The draft member Employment Packet will be submitted to the Bureau prior to distribution for review and approval. Packets will be filled in as much as possible upon distribution to members to ease the process for becoming a member. Relevant documents include workers' compensation information, guidance for creating job descriptions, interviewing, hiring new employees, terminating workers, timelines for satisfaction surveys, and worker and member rights and responsibilities. We have reviewed and will incorporate all documents noted within this response.

Ongoing Employer Skills Training

All training and enrollment materials will be available to members at any time should they request a copy from our Resource Consultants, F/EA FMS, or Administrative staff, and all documents will be made available online 24/7. Standard curriculums containing all documents and rules outlined in this section around member orientation and member skills training will be available for access at any time should members need a refresher or should

they need to update any of their documents related to member-direction. There is no limit to number of times members will be able to provide updated paperwork should their program or demographic information change throughout the course of using F/EA FMS and Resource Consulting with Consumer Direct.

4.57 The Vendor should develop and implement an evaluation form and process for evaluating the effectiveness of the member/representative-employer skills training sessions.

We continually work to improve the quality of member/representative - employer skills training sessions by evaluating these sessions annually. Our QI team is responsible for distributing, logging, and reporting on skills training session surveys. We also allow for submission of comments, questions, or concerns with program delivery at any time either directly to our program staff or via our state-specific website. Results of surveys are used to help identify any existing needs for improvement to ongoing program operations that can be adjusted to better meet the needs of our members and their DCSWs. Survey results can be cause for potential adjustments in program delivery.

Consumer Direct implements improvement plans resulting from QI's review of skills training session survey reporting and other sources of recommendations in coordination with designated Bureau staff.

4.58 The Vendor should develop a process for identifying member/representative-employers that may need and/or desire additional employer skills training in consultation with their Resource Consultant.

We provide additional customer support in times of transition for members, or on an as-needed basis to ensure members have additional needed guidance to successfully self-direct. We provide a high level of customer service, meaning we get back to members quickly and with real answers.

We have systems in place to identify instances of member non-compliance with program rules, which we find occurs for a number of reasons. When member-directed services are not being used effectively, additional targeted training is often the solution. Regardless of the reason for over or under spending or exceptionally high worker turnover, experience has taught us that a little extra support can make a huge difference for members. In these scenarios, we make available additional training in modular form whenever possible in order to allow the member to access all or part of the trainings at their convenience, or upon the state's request. Our Resource Consultants will provide remedial skills training to correct any substandard performance identified, as appropriate, and have processes in place for escalation to the Bureau in the event members continue to be non-compliant.

4.59 The Vendor should process and distribute DCSWs' payroll and related federal, state and municipal income tax withholding and employment-related taxes in compliance with all federal, state and municipal requirements within thirty (30) calendar days of services being provided to the self-directed member.

Consumer Direct processes payroll on a bi-weekly schedule. DCSW Enrollment Packets include all required federal, state and municipal payroll and tax withholding forms to make elections for deductions upon hire. DCSWs may change their deduction elections at any

time. Payroll stubs will be available to workers via the online portal under their user profile and detailed deduction and other payroll information will be detailed on all stubs, both electronically and on their mailed pay stub. Signed authorizations for deductions will be maintained in the DCSW's electronic file and particular deductions are entered as part of business rules into our accounting and payroll systems. We will cease to deduct any amount from any worker's payroll in the event the worker is terminated from employment, no longer authorizes the deductions, or in the event a third party disallows deductions.

Payroll will be processed within the timeframe established by the US Department of Labor, and in accordance with applicable West Virginia laws.

Although members and DCSWs are enrolled to understand the bi-weekly payroll schedule, we also recognize that there will be occasions when a DCSW or member is unable to correctly submit or approve a timesheet. Circumstances may be out of their control, and being paid on time and correctly is essential to sustain a healthy relationship members have with their workers. Should the need arise for an off-cycle payroll to be processed, Consumer Direct's payroll department will ensure that the DCSW is paid for authorized time worked.

4.60 The Vendor should process fitness determinations of fingerprint-based state and federal background checks per Bureau requirements for each member/representative-employer's DCSW, track the findings, provide the results to the RC within three (3) business days of receipt and notify the member/representative-employer of the results when they do not comply with Bureau requirements and maintain information in each DCSW's file.

We employ internal controls to track and report the progress of member enrollments and onboarding of newly hired DCSWs. Prior to allowing any DCSW into the home, we will require they undergo and obtain favorable results within all required state and federal background and fingerprint-based checks. With each new program we operate, our quality improvement team works to develop a master proficiency tracker tool which outlines all federal, state, and program-specific requirements of the roles of members and DCSWs. We use this proficiency tool to mark enrollment or onboarding, or other milestones required by the local program, as completed, in progress, or incomplete. We are able to generate reports based on this proficiency tool at any time, and at a frequency determined by the Bureau. The QI team will train on and implement a new tool particular to HCBS programs in West Virginia, and will report deficiencies, expirations, or completed progress at a frequency determined by the Bureau and in an approved format.

We will provide the resource consultant the results of fitness determinations within three (3) business days as required by this RFP. We will maintain any and all fitness determination results in each DCSW's electronic file and we will notify the employer of the results in the event a DCSW's checks produce a negative outcome.

4.61 The Vendor should verify the member's Medicaid eligibility prior to authorizing payment to a DCSW or participant-directed goods and services provider or vendor.

Consumer Direct will access the state's MMIS portal to verify the eligibility of each member prior to authorizing payment to a DCSW or for participant-directed goods or services. We recognize that there is no automated system in place to do this, but that it must be done individually by our staff.

4.62 The Vendor should determine if the DCSW is a paid family member of the member/representative-employer who is exempt from paying into Federal Insurance Contributions Act (FICA) and/or Federal Unemployment Tax Act (FUTA) and State Unemployment Tax Act (SUTA) (i.e., spouse or parent of minor child who is the participant/authorized representative-employer) per IRS Publication 15 (Appendix 6).

Consumer Direct will include an Employee Relationship Disclosure Form in the Employment Packets with a signature acknowledging that the relationship is exempt from paying into FICA and/or FUTA and SUTA as applicable. The Form will then be recorded in the payroll system for the participant/employee and will be maintained in the DCSW's electronic file.

Consumer Direct follows all IRS and DOL regulations as they apply to self-directed care. Including, IRS 2014-7, DoL Live-In and Companionship exemptions, as well as Social Security relationship exemptions. Forms for these regulations are included in all packets provided to the employer for their employee(s). Consumer Direct has a form available for DCSWs to sign "under penalties of perjury" as required by the IRS to indicate that they are exempt from income taxes per IRS Notice 2014-7. Consumer Direct discontinues withholding and follows IRS procedure for reporting zero wages in Box 1 of the W-2. Procedures are also in place to resume withholding if the DCSW's exempt status changes. The Form is maintained in the DCSW's electronic file.

4.63 The Vendor should determine if the DCSW qualifies for difficulty of care payments (exclusion from federal and possibly state income tax withholding) in accordance with IRS Notice 2014-7 (Appendix 7).

With each new enrollment, we require that DCSWs who claim a difficulty of care exemption fill out and sign an affidavit with their new hire paperwork attesting to the status of the member for whom they provide care, and attesting to their qualification for such an exemption per IRS Notice 2014-7. A copy of this affidavit is maintained in the DCSW's electronic file.

4.64 The Vendor should maintain documentation on the relationship of the member to worker in the DCSWs' and member/representative-employers' files.

All packets for DCSWs and member/representatives contain employment agreements which lay out the roles and responsibilities of the DCSW as the employee, and the DCSW's relationship to the member. We also provide and require a completed family relationship form to establish appropriate tax filing status. All documentation related to enrollment or employment by a member or representative is maintained in each member or DCSW's file.

4.65 The Vendor should determine if a DCSW is a non-resident of West Virginia and determine the appropriate method to be used for state income tax withholding for non-resident workers.

Our employment and background check process determine if a DCSW is a non-resident of West Virginia. Payroll processes non-West Virginia-resident state income tax withholding appropriate for non-resident workers and the state they reside in. Non-residents will be required to fill out WV Form IT-104, Withholding Exemption Certificate for non-residents.

4.66 The Vendor should maintain documentation on a DCSW's non-West Virginia resident status in the DCSW's file.

All documentation related to a DCSW's by resident status will be maintained in their electronic file.

4.67 The Vendor should verify DCSWs' hourly wages in compliance with federal and West Virginia department of labor wage and hour rules for domestic service workers and within maximum payment caps stated in the waiver manuals.

DCSWs' hourly wages will be verified as in compliance with federal and West Virginia department of labor wage and hour rules for domestic service workers and within maximum payment caps stated in the waiver manuals.

4.68 The Vendor should determine if the DCSW is a foster care or shared living provider in accordance with DOL Fact Sheet #79G (Appendix 8) and Administrator's Interpretation No. 2014-1 (Appendix 10) to determine the application of the Federal Fair Labor Standards Act (FLSA).

Fact Sheet 79G, Application of the FLSA to shared living programs, will be adhered to per the law. We will comply with record keeping requirements, minimum wage, overtime, companionship rules, live-in exemption rules as well as IRS ruling 2014-7. All records pertaining to the DCSW will be kept in their electronic files.

4.69 The Vendor should develop, produce, and distribute biweekly timesheets and instructions for DCSWs to member/representative-employers.

Consumer Direct is experienced at designing a user friendly OCR timesheet. It will produce one specifically to meet the requirements of West Virginia. We encourage time entry through our web portal as it ensures greater time submission accuracy, but for those individuals who specifically request a paper timesheet, they may download from the Consumer Direct West Virginia website or we will mail to the member or DCSW as necessary.

4.70 The Vendor should collect, verify and process DCSWs' biweekly time sheets per state department of labor and maintain copies in the DCSW's file.

After a DCSW biweekly timesheet is collected, verified, and processed, it is scanned and maintained in his/her electronic file.

4.71 The Vendor should have a system for addressing situations when a member/representative employer has his/her DCSWs work hours in excess of approved hours and signs the time sheet that reflects this overage.

Consumer Direct will work with the member/representative to educate them as to how any overtime worked must be covered by the member's approved spending plan and within their participant-directed budget. If a timesheet is submitted over-budget it may be denied. We will negotiate services in excess of the assigned budget only as an outlier situation. We will work with the member/representative to continue to train them as to the rules of the program and to stay within approved budget amounts.

4.72 The Vendor should notify the Bureau and the member/representative-employer when a DCSW works in excess of approved hours within three (3) working days of receipt of the Involved time sheet.

Member/representative-employer and the Bureau will be notified within three (3) working days of receipt of the Involved timesheet when a DCSW works in excess of approved hours.

4.73 The Vendor should have a system for recouping overages when a DCSW works in excess of approved hours per the Bureau requirements. If the overage is the Vendor's responsibility, then the Vendor should pay back the Bureau for any overpayments made to DCSW.

Consumer Direct can bill members or representatives for services and goods provided above authorized amounts (when the State allows it), and for services and goods not covered by the State but obtained by the member under separate agreement. Over-budget situations are minimized or eliminated through careful monitoring of each member's budget and utilization, and through programmatic application of business rules in the service delivery lifecycle. For example, over-budget service episodes can be prevented prior to their delivery through notice to the member that budget limits have been reached for a specific timeframe. Services submitted that create an over-budget situation can be suspended for processing, and partially paid or even denied for payment. In these cases, the need for billing the member for over-budget services is controlled and minimized.

4.74 The Vendor should compute, withhold, file, and track federal income tax withholding, Medicare, and Social Security taxes for member/representative-employers and their DCSWs quarterly in the aggregate using the Subagent-F/EA FMS entity's separate FEIN and using the IRS Form 941, Employer's Quarterly Federal Tax Report and the IRS Form 941 Schedule R. The Subagent-F/EA FMS entity's federal income tax withholding and FICA (Medicare and Social Security tax) depositing use rules based on the entity's aggregate deposit liability. Therefore, an IRS Form 941 Schedule B is required in most cases and Vendor maintains copies of the filed IRS Forms 941, IRS Form 941 Schedule R and Schedule B, as applicable and related correspondence in Subagent-F/EA FMS division's file.

Consumer Direct computes, withholds, files, and tracks Federal income tax withholding, Medicare and Social Security Taxes (FICA) for members and their employees. Consumer Direct timely files IRS form 941, Employer's Quarterly Federal Tax Report and the IRS Form 941, Schedule R in the aggregate using the assigned FEIN as the FEA for the member. Additionally, Consumer Direct is a semiweekly schedule depositor and files IRS Form 941, Schedule B. Copies of all Forms filed and deposit verifications are maintained in Consumer Direct's electronic payroll files.

Consumer Direct will run a report at year end to determine all DCSWs who did not reach the FICA threshold for \$2,000. All DCSWs under the \$2,000 threshold will be refunded the FICA taxes paid in at year end. The FICA taxes refunded will not be reflected on the annual W-2. Form 941X will be filed the following fiscal year to recoup the FICA taxes refunded. FICA deposit documentation on behalf of all members is maintained in our electronic files.

We compute, withhold if required, and file Form

4. Please rate the help you get with the following:

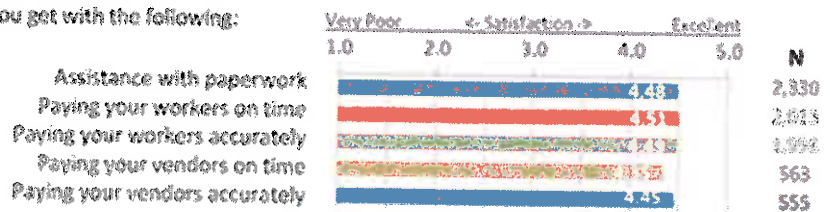


Figure 5: Customer Satisfaction in Payroll Processing

940, Employer's Annual Federal

Unemployment (FUTA) Report and the IRS form 940 Schedule R annually and electronically via EFT, in the aggregate, using the assigned FEIN as the FEA for the member. FUTA is deposited quarterly (or can be weekly if withheld) using the FEA Federal Employer Identification Number (FEIN) in accordance with IRS deposit rules. Copies of Form 940, including Schedule R, and evidence of confirmed IRS deposits are maintained in Consumer Direct's electronic files.

4.75 The Vendor should deposit federal income tax withholding in the aggregate using the Subagent — F/EA FMS entity's separate FEIN (electronic EFTS filing) and per IRS depositing rules for Government F/EA FMS.

As an FMS entity in nearly all of the states in which we operate, we are experienced at researching and incorporating varied state taxation requirements into our procedures to file taxes on behalf of members. Consumer Direct timely files IRS form 941, Employer's Quarterly Federal Tax Report and the IRS Form 941, Schedule R in the aggregate using the assigned FEIN as the FEA for the member. Additionally, Consumer Direct is a semiweekly schedule depositor and files IRS Form 941, Schedule B. Copies of all Forms filed and deposit verifications are maintained in Consumer Direct's electronic payroll files.

4.76 The Vendor should deposit FICA tax in the aggregate using the Subagent-F/EA FMS entity's separate FEIN (electronic EFTS filing) and per IRS depositing rules.

Consumer Direct computes, withholds, files, and tracks federal income tax withholding, Medicare and social security taxes (FICA) for members and their DCSWs. We timely file IRS form 941, Employer's Quarterly Federal Tax Report and the IRS Form 941, Schedule R in the aggregate using the assigned FEIN as the F/EA for the participant. Additionally, Consumer Direct is a semiweekly schedule depositor and files IRS Form 941, Schedule B. Copies of all forms are filed and deposit verifications are maintained in our electronic payroll files.

4.77 The Vendor should maintain copies of Federal income tax withholding, FICA filing documentation in the Subagent-F/EA FMS division's files.

Copies of federal income tax withholding, FICA filing documentation will be scanned and maintained in our division's electronic files.

4.78 The Vendor should maintain copies of Federal income tax withholding, FICA deposit documentation in the Subagent-F/EA FMS division's files.

Copies of federal income tax withholding, FICA deposit documentation will be scanned and maintained in our electronic files.

4.79 The Vendor should compute, withhold and file FUTA annually in the aggregate using the Subagent - F/EA FMS-Counseling entity's separate FEIN and the IRS Form 940, Employer's Annual Federal Unemployment (FUTA) Report and the IRS Form 940 Schedule R.

Consumer Direct computes, withholds if required, and files Form 940, Employer's Annual Federal Unemployment (FUTA) Report and the IRS form 940 Schedule R annually and electronically via electronic funds transfer systems (EFTS), in the aggregate, using the assigned FEIN as the FEA for the member. FUTA is deposited quarterly (or can be weekly if withheld) using the FEA FEIN in accordance with IRS deposit rules. Copies of Form 940, including Schedule R, and evidence of confirmed IRS deposits are maintained in Consumer Direct's electronic files.

4.80 The Vendor should maintain copies of the annually filed IRS Form 940, and IRS Form Schedule R and related documentation in its files.

Copies of the annually filed IRS Form 940, and IRS Form Schedule R, as well as any related documentation, will be scanned and maintained in our electronic files.

4.81 The vendor should deposit FUTA in the aggregate (electronic EFTS filing) using the Subagent-F/EA FMS entity's separate FEIN in accordance IRS depositing rules for Government F/EA FMS entities.

In accordance IRS depositing rules for Government F/EA FMS entities, FUTA is deposited quarterly (or can be weekly if withheld) using the FEA Federal Employer Identification Number (FEIN) in accordance with IRS deposit rules. Copies of Form 940, including Schedule R, and evidence of confirmed IRS deposits are maintained in Consumer Direct's electronic files.

4.82 The Vendor should maintain copies of FUTA deposit documentation in the Subagent — F/EA FMS entity's files.

Copies of FUTA deposit documentation will be scanned and maintained in our electronic files.

4.83 The Vendor should enroll as an electronic filer and payer for state income tax withholding, unemployment insurance tax with the West Virginia State Tax Department and Work Force West Virginia Job Service/Unemployment.

We will enroll all DSCWs with the West Virginia Department of Revenue and West Virginia Unemployment as well as all other applicable taxing agencies. We will enroll as an electronic filer whenever possible. WV forms WVUC-154-A Wage Report, and WV/IT-101 will be included, as well as any other required forms.

4.84 The Vendor should compute, withhold and file state unemployment insurance taxes quarterly for each member/representative-employer using his/her state unemployment insurance tax employer identification number and the WVUC-A-154, Contribution Report and WVUC--A-154 Wage Report per the Work Force West Virginia, Unemployment Compensation Insurance requirements and maintain copies of forms and documentation in the member/representative-employer's file.

Copies of state unemployment insurance tax filings, and copies of WVUC-A-154 Contribution Report and WVUC-A-154 Wage Report and related documentation will be scanned and maintained in member/representative-employers' files.

4.85 The Vendor should compute, withhold and file state income tax withholding quarterly using the member/representative-employer's state income tax employer identification number and the West Virginia State Tax Department Form WV/IT-101, Employer's Return of West Virginia Income Tax Withheld for each West Virginia resident member/representative-employer and qualifying West Virginia non-resident employee. The Vendor should maintain copies of state income tax withholding filings and related documentation in the member/representative-employers' files.

Copies of state income tax withholding filings, WV/IT-101 and related documentation will be scanned and maintained in member/representative-employers' files.

4.86 The Vendor should deposit state income tax withholding for each member/representative employer West Virginia resident and qualifying non-resident DCSWs. The Vendor should maintain copies of documentation in each member/representative-employer's file.

Copies of associated documentation will be scanned and maintained in member/representative-employers' files. State taxes will be deposited before the 15th of the following month and quarterly summary returns, WV/IT-101Q, will be filed the last day of the month following quarter end.

4.87 The Vendor should withhold and file municipal taxes, as required, for each member/representative-employer. The Vendor should maintain copies of municipal tax filings and related documentation in each member/representative-employer's file. The Vendor should deposit municipal taxes, as required for each member/representative employer. The Vendor should maintain copies of municipal tax payments and related documentation in each member/representative-employer's file.

Consumer Direct will withhold and file all municipal taxes, as required, and will deposit municipal taxes, as required, for each member/representative-employer. We will continually monitor municipal requirements in order to stay current with all municipalities. We will maintain copies of all municipal tax filings, tax deposits, and related documentation for each, in each member/representative-employer's file.

4.88 process all judgments, garnishments, tax levies, or other related holds on DCSWs' pay as may be required by federal, state or municipal governments and maintain copies of documentation in the DCSW's file.

Consumer Direct will withhold and pay all judgments, garnishments, tax levies, or other related holds on DCSW pay required by Federal or District governments. Amounts are withheld and processed every pay period through accounts payable. Copies of all related documents are filed and stored in the DCSW's electronic file. We will comply with DCSW's request to withhold additional income taxes per their W-4 Form elections and number of exemptions claimed. We will accommodate changes to deductions or exemptions with a new W-4 Form at any time should the DCSW elect to make the change. Copies of associated documentation will be scanned and maintained in each DCSWs' files.

4.89 The Vendor should generate DCSW payroll checks and mail or perform electronic direct deposits of checks in accordance with Chapter 600 of the West Virginia Medicaid Manual located in Appendix 4 of this RFP and any other federal or state requirements.

Consumer Direct will generate DCSW payroll checks and mail or perform electronic direct deposits of checks in accordance with all applicable rules and requirements.

We train members/representatives and DCSWs on the bi-weekly payroll schedule so they can submit accurate and timely timesheets. We recognize that there will be occasions when a member/representative or DCSW may be unable to correctly submit or approve a timesheet. Circumstances may be out of their control, and being paid on time and correctly is essential to sustain a healthy relationship members have with their DCSWs. Should the need arise for an off-cycle payroll to be processed, Consumer Direct's payroll department will ensure that the DCSW is paid for authorized time worked.

4.90 The Vendor should process direct deposits of DCSWs' payroll checks as requested and maintain copies of documentation in the DCSW's file.

We recognize that one of the most critical roles of the F/EA is to disburse payment timely and accurately to all DCSWs hired by members in the self-directed program. In processing approximately 330,000 payroll checks annually (meaning direct deposit and paper checks), 97.9% were processed on time and accurately. The rate of accuracy and timeliness increases to 98.9% when online time submission through our web portal is required. Member perception of payroll accuracy is an important metric. Our nationwide satisfaction rate for accurate and timely payroll is reflected in this excerpt from our Customer Satisfaction Survey results. Copies of associated documentation will be scanned and maintained in each DCSW files.

"Everything has been good. Payroll has been accurate. The questions from me and payee have been answered in a in timely manner. Thank you for all your help."

~ Consumer Direct 2016 Customer Satisfaction Survey respondent.

4.91 The Vendor should develop a system for managing improperly cashed or issued payroll checks, stop payment on checks, and for the re-issuance of lost, stolen or improperly issued checks including:

4.91.1 Maintenance of a log of voided and reissued checks, including all information;

4.91.2 Proper authorization of all stop payments and re-issuances;

4.91.3 Timeframe for re-issuance of checks (i.e., within three (3) working days of notification of lost/stolen check) and issuance of stop payment request.

This answer incorporates 4.91.1 to 4.91.3.

Consumer Direct's process for managing lost, stolen or improperly cashed checks includes maintaining a log of voided and reissued checks including proper authorization and timeframe. Our payroll department is prepared to reissue a check within three (3) working

days of receipt of notification it has been lost or stolen. We maintain these records in our secure electronic files.

4.92 The Vendor should research, track and resolve all tax notices received from the IRS, West Virginia State Tax Department and Work Force West Virginia Job Service/Unemployment regarding DCSWs' tax liabilities/liens, including all information and steps to resolution.

Consumer Direct will research, track and resolve all tax notices received from the IRS or any state taxing entity regarding a DCSWs tax liabilities for liens. We will work with the entity to the best of our ability to take steps toward a resolution.

4.93 The Vendor should maintain copies of all documentation related to electronic West Virginia tax filings and payments in the Subagent-F/EA FMS entity's file.

Copies of associated documentation will be scanned and maintained in our electronic files.

4.94 The Vendor should verify that each DCSWs social security number matches the name and date of birth information obtained from the Social Security Administration's Business Services Online prior to submitting IRS Forms W-2 to the employer, the West Virginia State Tax Department, and the Social Security Administration each calendar year.

Consumer Direct frequently files Social Security number verifications with Social Security Business Services Online. Any names and/or social security numbers that do not match, are followed up on so that the information can be corrected for the SSA and year end reporting.

4.95 The Vendor should file the annual reconciliation of West Virginia state income tax withholding for each member/representative-employer using the West Virginia State Tax Department Form WV/IT-103, Annual Reconciliation of West Virginia Income Tax Withheld for each West Virginia resident and qualifying non-resident member/representative-employer, and the member/representative-employer's employer identification number and maintain copies of the form and related documentation in each member/representative-employer's file.

Copies of associated documentation will be scanned and maintained in each member/representative-employers' files. At year end, vendor will engage in filing all state and federal employment reports as required by state and federal law. These forms include, but may not be limited to, WV/IT103, as well as any other state agencies as required by the WV non-resident DSCW states of residence. IRS W2, IRS W3, IRS 941 (Quarterly) and IRS form 940 (annually).

4.96 The Vendor should process refunds of over collected FICA for eligible member/representative-employers to DI-IHR and eligible DCSWs.

Consumer Direct will run a report at year end to determine all DCSWs who did not reach the FICA threshold for \$2,000. All DCSWs under the \$2,000 threshold will be refunded the FICA taxes paid in at year end. The FICA taxes refunded will not be reflected on the annual W-2. Form 941X will be filed the following fiscal year to recoup the FICA taxes refunded. As with all other tax-related forms, documentation of the FICA refund is maintained in the DCSW's electronic file. Our payroll department is familiar with documenting FICA contribution limits, and it is our policy to discontinue FICA deductions once that limit is reached. In the event

FICA contributions exceed established FICA limits, we will follow the appropriate process for refunding contributions in excess of limits to the DCSW and the Bureau, should the member's portion of FICA contributions also need to be refunded.

4.97 The Vendor should maintain documentation related to FICA refunding in each applicable member/representative-employer's and DCSW's files.

It is standard practice that we maintain all FICA refund documentation in the DCSW's file, and in the file of their associated member or representative.

4.98 The Vendor should process, file and distribute IRS Forms W-2, Wage and Tax Statement for all DCSWs and in accordance with IRS instructions for agents. As part of this process, the total gross payroll per the Form W-2 should be reconciled to the calendar year's total gross payroll and to gross payroll values filed on Forms 941 and 940.

Consumer Direct tracks all gross wages and taxes, providing an annual total for reconciliation to the W2s, 940 and 941. W2s are processed and distributed in accordance with IRS regulations.

4.99 maintain copies of the federal copy of Forms W-2 and related documentation in each DCSW's file.

Consumer Direct prepares and issue IRS Form W-2 annually on behalf of individual members. W-2 statements will, in accordance with IRS instructions, include relevant payroll and federal and state taxes for the prior year. Our policies and procedures for all of our programs in which we operate as an F/EA detail the timelines regarding when DCSWs can expect to receive their W-2 forms. Income reported on W-2 forms reflects the DCSW's gross payroll for the total preceding calendar year. Our centralized payroll and human resources departments work diligently at the beginning of each calendar year to guarantee that SSWs and administrative staff receive their W-2 information by the required IRS deadline.

New hire procedures for DCSWs includes confirmation of Social Security numbers and vendors' FEINs as appropriate through SSA's Business Services Online system, which also enables us to check that the SSN matches the name and date of birth filled in by the DCSW. All new hire reporting documentation will be maintained in the DCSW's electronic files. SSNs are verified upon initial hire and quarterly thereafter, along with basic demographic information such as date of birth and full legal name.

4.100 The Vendor should process and file the IRS Form W-3, Transmittal of Wage and Tax Statement, as applicable and maintain a copy of the form in the member/ representative employer's file.

A W-3 transmittal will be filed along with each member's W-2s, in the aggregate, on an annual basis in accordance with IRS and Social Security Administration regulations. Copies of W-3s will be kept in member/representatives' files.

4.101 The Vendor should process any returned DSCWs' payroll checks in accordance with the West Virginia Unclaimed Property Act (Appendix 10) and CFR 42 Part 433 Section 40 (Appendix 11).

Consumer Direct keeps a log and copies of all unclaimed payroll checks and files an unclaimed property report on annual basis in accordance with the rules and regulations of the state.

4.102 The Vendor should maintain copies of West Virginia Unclaimed Property-related documentation related to returned DCSWs' payroll checks or providers' and/or vendors' payments in the DCSW's file.

Consumer Direct will maintain copies of West Virginia Unclaimed Property - related documentation related to DCSW payroll in the appropriate DCSW electronic file.

4.103 The vendor should process, pay and track payments for approved participant-directed goods and services received from service providers and vendors. Tasks/requirements include the following:

4.103.1 The Vendor should receive, verify, and process all invoices from approved participant-directed goods and services providers and vendors in accordance with the member's Spending Plan and monitor expenditures against it and maintain this documentation in the provider/vendor's file and electronic exchange data information with the Bureau.

4.103.2 The Vendor should pay service providers' and vendors' invoices for approved participant-directed goods and services in accordance with the member's Spending Plan within thirty (30) calendar days of receiving the invoice and maintain this documentation in the provider/vendor's file and electronic exchange data information with the Bureau.

4.103.3 The Vendor should process any returned provider or vendor payments in accordance with the West Virginia State Treasury Department's Division of Unclaimed Property requirements and procedures and in compliance with CFR 42 Part 433 Section 40 (Appendix 11).

4.103.4 The Vendor should maintain copies of West Virginia Unclaimed Property related documentation in the service provider's and vendor's file.

4.103.5 The Vendor should distribute IRS Forms SS-8, Determination of Worker Status for Purpose of Federal Employment Taxes and Income Tax Withholding when there is a question of whether his or her participant-directed goods or service provider or vendor is an independent contractor.

4.103.6 When a participant-directed goods and services provider or vendor is determined to be an independent contractor, the Vendor should distribute, collect and process IRS Forms W-9, Request for Taxpayer Identification and Certification members' participant-directed goods and services provider or vendor who are determined to be independent contractors.

4.103.7 When a participant-directed goods and services provider or vendor is determined to be an independent contractor, the contractor should process, file and distribute an IRS Form 1099-Misc, Miscellaneous Income to each applicable provider or vendor that is paid Six Hundred Dollars (\$600) or more from January 1 to December 31 in any given year and maintain a copy of the Form in the applicable provider's or vendor's file.

This response incorporates answers to 4.103.1 to 4.103.7

We will develop a packet for participant-directed goods and services which meets Bureau regulations and which will enable providers or vendors to build profiles and receive payments for goods or services rendered to members. Provider or vendor information is reviewed within our accounting and CRM systems for accurate filing and proper maintenance on an ongoing basis. Once the vendor requests are submitted to Consumer Direct, the request flows from the central electronic file cabinet directly through each department for processing to include recording of W-9 information, payment to the vendor, spending reports, and 1099 filing. If there is a question regarding the Independent Contractor Status of a vendor, Consumer Direct will use the guidelines established by the IRS and issue Form SS-8 to make the determination. All documents related to purchases out of the member's approved budget are filed and stored electronically in separate secure files. Payments to providers or vendors will be made within thirty (30) calendar days of receiving the invoice.

Forms are barcoded for accurate filing in providers or vendors' files and are stored on multiple secure servers. In the event Consumer Direct is required to remit payment to an external third party vendor for services related to a specific program, we also monitor vendor information for accurate filing and proper maintenance on an ongoing basis. We have the ability to track vendor payments against participant budgets in our online portal and our accounting systems. All documents containing vendor information are stored electronically in separate secure files.

Invoices submitted to the office are scanned and recorded in our document management system. The invoices are processed by our data entry department where they are loaded into the accounting system. The natural integration into the accounting system ensures that all payments correspond to the correct plan upon payment.

4.104 The Vendor should propose a system and policies, procedures, and internal controls for providing RC services statewide to support members enrolled in Personal Options in all areas of directing their services. The Vendor's proposal should address, but need not be limited to, the following tasks:

4.104.1 Assisting interested and eligible members and employee to enroll in Personal Options, including the completion and submission of Employer Enrollment and DCSW Employment and Participant Directed Goods and Services Vendor and Service Provider Packets.

Our success in resource consulting services starts with a person-centered philosophy. As is implied in the name of our company, Consumer Direct was founded on the critical recognition of the person-centered approach in order to empower people living with disabilities, and older adults, to effectively determine their own best course of in-home personal care. Consumer Direct will use a person-centered approach in every interaction with members. The member is at the center of the planning process and is encouraged to identify their needs, wishes, goals, and choices. During the enrollment process the RC encourages the

member/representative to identify his or her gifts, capacities, and strengths to build upon and reach goals.

Our staff ensure that all trainings rotate through multiple learning styles including; visual, aural, verbal, solitary, logical, social and kinesthetic styles. We combine the use of group training sessions to ensure that verbal, group, visual and aural learning styles are continuously stimulated. We also utilize web-based and written manuals to target visual, solitary, logical and aural learning styles. Tests and exercises are found at the end of each training component to establish critical thinking skills. Our trainings are designed to individualize the learning process to ensure that each trainee gets the most out of his/her experience in self-direction. We also have years of experience in testing enrollment or program materials we develop to ensure that the reading level is accessible to individuals from all walks of life.

As with the variety of training formats used to accommodate different learning styles and strengths, Consumer Direct also employs a variety of formats for collecting feedback to improve the ongoing delivery and revision of our training services. Formats include a printed or digital text document, or an oral survey given by someone not employed by Consumer Direct (to encourage candid responses). Support Broker staff meet as a group frequently; in many states the staff meet weekly to exchange ideas and observations from the week prior. Our staff is encouraged to bring what they learn in the field back to the group for programmatic improvement.

Consumer Direct offers company-wide trainings in Person Centered Approach on an annual basis. Anyone from Payroll Coordinators to a Project Manager to our Risk Manager is invited to attend this training. Our Company vision outlines that we want to lead the industry in expanding choice and control in the lives of people with disabilities and older adults. To truly deliver on this vision, we strive for buy-in on self-direction from all levels of our staff, from top to bottom.

Consumer Direct understands success in any consumer- or self-directed program begins with comprehensive member training. We train our RC staff on person-centered planning and on program details upon hire and annually. This equips our RCs with the ability to train members and DCSWs to fully understand how to support members in understanding and enrolling in Personal Options.

Consumer Direct has trained thousands of clients to be good employers and self-direct services, in addition to the Company's extensive training program for staff. While the standard format of printed training manual is adequate for many participants, Consumer Direct is currently evaluating online training programs and tools available for participants self-directing their care. For those members/representatives new to participant-direction, they will learn about the benefits of the program and the choice and control over the services the member receives. They will also learn about the responsibilities that go along with the freedom of employing their own DCSWs and managing their budget for goods and services.

RC staff will be located through the state in order to provide knowledgeable and local support to the members they serve.

4.104.2 Entering member/representative information into the web-based portal utilized by the Bureau and the selected Vendor for project management and reporting.

Our RC staff will be knowledgeable about the web-based portal utilized by the Bureau for project management and reporting. Information will be entered into the portal timely and completely. With role-based access to the portal, members, representatives, DCSWs, Bureau staff and any other approved user has on-demand access to the information they are approved to view.

4.104.3 Assisting members and representatives, as appropriate, in developing, receiving approval, and implementing their initial twelve (12) month Service/Spending Plan and subsequent updates and reviewing Spending/Service plans with members and their representatives, as appropriate, during the monthly calls and during the six (6) month in-person visits. The monthly phone call can be made on any day during any given month.

We will use efficient external processes to obtain members' approved initial budgets and any updates. Our RCs will work with the members/representatives to develop their initial twelve (12) month Service/Spending Plan. RCs will review the budget with the member/representative during monthly phone calls and six (6) month in-person visits.

We will maintain the member's Spending/Service plans in digitally and file it in our secure Customer Resource Management (CRM) system. This ensures that all information surrounding a participant is both secure and accessible in real time to all interested parties. The member/representative or any authorized user will have real-time access to budget reports through our web portal.

Our established internal processes ensure a seamless transfer of information to our payroll department and our claims department for vendor payments

4.104.4 Assisting members and representatives, as appropriate, to develop training required of all DCSWs. DCSWs cannot provide and/or bill for services until training has been completed.

Upon enrollment and ongoing, we will ensure that members/representatives understand which trainings are required for the DCSWs serving the member. We will maintain the status of all trainings and their expiration dates in our Proficiency Tracking system. Members/representatives and DCSWs will receive notification 90-, 60-, and 30-days prior to expiration so they may renew their training and not become disqualified from providing service to the member.

4.104.5 Collaborating with the Subagent-F/EA FMS Division to verify that all DCSWs have completed the training as referenced in the ADW, IDW and TBIW policy Manuals all located on website: <http://www.dhhr.wv.gov/bms/Pages/Manuals.aspx>. Assisting the Subagent-F/EA FMS Division to develop and maintain a directory of DCSWs including a registry/directory of potential DCSWs.

Using our CRM, and through best practices, our FMS and RC divisions will work collaboratively to maintain seamless service to members. Maintaining DCSW training expiration dates in our Proficiency Tracker, and notifying members/representatives and

DCSWs 90-, 60-, and 30-days prior to a training expiration will ensure DCSWs remain eligible to work.

*DCSWs are invited to participate in our Consumer Direct Provider Directory. The Provider Directory is a useful tool for DCSWs looking for additional work, and for members who are seeking DCSWs. For a look at how our Provider Directory functions, please visit our Consumer Direct District of Columbia website and click on the Provider Directory button.
<https://providers.consumerdirectcare.com/district-of-columbia>*

Consumer Direct site are Section 508 compliant.

4.104.7 Assisting the member or representative, as appropriate, in identifying and providing DCSW benefits, as applicable.

Although the Bureau has indicated workers' compensation is not a benefit currently available, we offer it included in our PMPM to the Bureau. In our experience, the provision of workers' compensation provides peace of mind to members and protects workers when necessary.

We incorporate DCSWs into our companywide workers' compensation insurance policy across the nation. Providing workers' compensation insurance through our policy is a low cost way to provide this benefit. Consumer Direct administers workers' compensation to FMS programs in the District of Columbia, Florida, Texas, and Wisconsin. Additionally, Consumer Direct's Risk Manager is available to assist the DCSWs of members/representatives with claims processing.

We offer this for the Bureau's consideration.

4.104.8 Conducting monthly phone calls with members to provide guidance and support while members are using Personal Options.

Consumer Direct RCs will check in with members using Personal Options monthly. We will provide guidance and determine if additional support is needed.

4.104.9 Conducting in-person home visits with members every six (6) months to provide guidance and support while members are using Personal Options except for IDDW.

Consumer Direct RCs will visit members in their home every six (6) months to offer guidance and determine if additional support is needed. We will do this with all members using Personal Options except for those on the IDD Waiver.

4.104.10 Assisting members and representatives, as appropriate, to identify and retain services of qualified agencies and/or individuals for services available under each Self-Directed program.

One of the benefits of hiring RCs who live in the same community as the members they serve is that they are uniquely qualified to know and understand the services available in that community. Whenever possible we will seek to align a member with an RC who lives in or near the member's community. Consumer Direct RCs will assist members/representatives, when appropriate, to identify and retain services from qualified agencies or individuals.

4.104.11 Assisting members and representatives, as appropriate, to purchase Participant Directed Goods and Services (i.e., assistive technology, personal emergency response systems and home modifications).

Relying on accurate collection of enrollment paperwork from goods and services vendors, our RCs will assist members and representatives, as appropriate, in assessing their needs for a good or service, determining the best vendor or provider, and ensuring that they stay within their authorized budget.

4.104.12 Monitoring members' health, safety, and welfare through enrollment and initial planning process, including participants of TMH prior to transitioning to the community, and required monthly calls and six (6) month in-person visits with members.

The Bureau's structure of the Personal Options program, and the requirement to maintain such a high level of engagement with members ensures the greatest opportunity for a successful self-directed program, as well as the greatest ability to ensure health, safety and welfare of members. In addition to the person-centered philosophy training our RCs receive, they are also trained to recognize and identify markers of good health, and a safe home or living environment.

4.104.13 Maintaining member and representative files and records including member notifications in automated systems.

All staff, including FMS and RC divisions of this contract, maintain member and representative files, records, contacts and notifications in secure electronic and automated systems.

4.104.14 Documenting and reporting evidence and observations of members' and representatives' inability to self-direct.

Through the RCs required visits and contacts, they are able to monitor health, wellness, satisfaction and competency to self-direct during each contact. When appropriate, RCs will make recommendations and participate in resulting actions from monitoring visits and contacts. These include but are not limited to voluntary or involuntary termination, designating a representative, replacing a representative, critical incident reports, and potentially transition to traditional care.

4.104.15 Reporting and responding to all member/representative complaints regarding Subagent-F/EA FMS — RC entity using required reporting and systems.

Consumer Direct uses established internal policies and procedures to monitor complaints, and to respond to complaints by improving our performance and customer service. Our policies and procedures are referenced in Appendix B: Base Policies and Procedures Manual for F/EA FMS and Resource Consulting, and include a section titled Complaint Reporting and Management (page 11. This section illustrates the comprehensive processes we follow to ensure full compliance with state and federal regulations, and the way we track complaints to ensure they are brought to full resolution.

4.104.16 Reporting and responding to all member/representative grievances using the required reporting processes and systems.

As we do with complaints, we use established internal policies and procedures

to monitor grievances, and to respond to those grievances by improving our performance and customer service. Our policies and procedures on this topic are referenced in Appendix B: Base Policies and Procedures Manual for F/EA FMS and Resource Consulting, in the section titled Grievance Reporting and Management (page 12). This illustrates the processes we follow to ensure full compliance with state and federal regulations, as well as the way we track grievances to ensure they are brought to full resolution.

4.104.17 Acting as a mandatory reporter and report and respond to all simple and critical incidents, including any and all allegations or reports of suspected abuse, neglect and exploitation.

All Consumer Direct staff are trained on mandatory reporting requirements, and trained to report and respond to both simple and critical incidents. Mandatory Reporting is covered in Appendix B: Base Policies and Procedures Manual for F/EA FMS and Resource Consulting on page 11 of the manual.

4.104.18 Assisting members and representatives as needed to be re-evaluated for eligibility for services, requests for a change in level of care, request for dual service provision, and request for transfer to traditional agency-directed services.

RCs will provide assistance, as requested or as needed, when a member seeks to be re-evaluated or requests a change in level or care or types of care. They will also assist should they recognize that the member may not be a good candidate for self-direction and should transfer to traditional agency-directed services, or if the member requests agency-directed services.

4.104.19 Interacting and collaborating with staff from the Subagent-F/EA FMS Division and other state program staff to ensure efficient program operation.

Consistent and collaborative communication systems between internal divisions and the Bureau and state are essential to effective program operation. Our program teams are managed with an eye to open, responsive and accountable communication.

4.104.20 Training of Resource Consultant staffing accordance with State agency guidelines using a training protocol approved by the Bureau to ensure Resource Consultants can provide the required services to members and representatives effectively.

We have extensive internal training protocols and look forward to evaluating these protocols with the Bureau to ensure full compliance.

4.105 The Vendor should prepare and submit required Subagent-F/EA FMS reports to member/representative-employers, RC division and Bureau.

Consumer Direct has extensive reporting capabilities. We are accustomed to creating, maintaining and submitting reports that meet exacting state standards. We look forward to

working with the Bureau to ensure reports meet Bureau standards. Required Subagent-F/EA FMS reports will be prepared and submitted to the Bureau.

4.106 The Vendor should provide reports as requested by the Bureau within seven (7) business days of the request.

Reports requested by the Bureau will be provided within seven (7) business days of the request. Consumer Direct is accustomed to meeting diverse agency reporting needs, including on-demand reporting of payroll and vendor checks, spending and expenses, training completion, and any other report required for Medicaid, the IRS, and state tax commissions. Reports are deliverable in paper and electronic formats and are transmittable by secure FTP, web site, email, electronic portable media, and standard mail. Reports are customizable according to Bureau's specifications, made available in realtime or as archived data dependent on Bureau preferences.

Reports are also accessible via our web portal, depending on the requestor's role. All requests are evaluated to ensure compliance with HIPAA security and privacy requirements. Consumer Direct logs all report requests and deliveries to identify user and date of delivery. All of our platforms utilize Microsoft .NET and SQL Server technology, which allows us to access information across platforms - integration of CRM and Claims Management data, for example - to deliver a comprehensive and tailored reporting experience to users.

4.107 The Vendor should provide ad hoc reports requested by the Bureau within seven (7) business days of the request.

Requested ad hoc reports will be provided to the Bureau within seven (7) business days of request.

4.108 The Vendor should provide the Bureau a copy of the monthly statement from the dedicated payroll bank accounts within fifteen (15) business days of the request along with any other financial information that may be necessary for the Bureau to oversee the delivery of Subagent-F/EA FMS. The Vendor should maintain relevant documentation in the Vendor's files.

A copy of the monthly statement from the dedicated payroll bank accounts will be provided within 15 business days and the relevant documentation will be maintained.

4.109 The Vendor should provide the Bureau with a monthly discovery and remediation report at least one week prior to scheduled contract meetings based on performance measures identified by the Bureau under the guidance of CMS.

Consumer Direct will provide the Bureau with a monthly discovery and remediation report at least one week prior the scheduled contract meetings.

4.110 The Vendor should provide the Bureau with quarterly and year-end financial reports within forty-five (45) calendar days of the end of the quarter or end of the year.

Reporting through the portal can be adjusted to meet the particular program requirements and needs of Bureau including quarterly and year-end financial reports provided within forty-five (45) calendar days of the end of the quarter or end of the year.

4.111 The Vendor should provide an up to date monthly spending report to members who do not have access to the Internet within five (5) business days following the end of the payroll period that includes the last day of the month.

Use of the portal provides the most rapid access to a variety of tasks as mentioned in this section. However, for those members who do not have access to the internet we will mail a printed copy of their monthly spending report within five (5) business days following the end of the payroll period that includes the last day of the month. This ensures that the spending report reflects spending of the last pay period in the prior month, and if there is anything pending to be paid.

We recognize the importance of assisting members to be cognizant of their spending. Members using the portal for timesheet submission will receive real-time alerts as to where they stand relative to their available budget. Those relying on paper spending reports can always call their RC if they have questions mid-month regarding their budget status. To facilitate effective use of the portal, we also have West Virginia-based and customer service center staff available during regular business hours to answer questions and concerns from members DCSWs should any arise.

4.112 The Vendor should ensure that copies of information and reports are not distributed to other parties without the written permission and direction of the Bureau.

Information and reports will not be distributed to other parties without the written permission and direction of the Bureau.

4.113 The Vendor should have a system and policies, procedures, and internal controls for establishing and managing (1) member/representative-employer, (2) DCSWs, (3) participant-directed goods and services provider and vendor, (4) Pre-transition Resource Consultant services to TMH participants; (5) Subagent-F/EA FMS and RC current files in a complete, secure, and confidential manner and for the length of the contract. RC archived files in a complete, secure, and confidential manner and for the required period of time as mandated by applicable federal and West Virginia rules and regulations.

All staff are trained on the manual upon hire. Consumer Direct updates policies and procedures and internal controls for establishing and managing (1) member/representative-employer, (2) DCSWs, (3) participant-directed goods and services provider and vendor, (4) Pre-transition Resource Consultant services to TMH participants; (5) Subagent-F/EA FMS and RC current files in a complete, secure, and confidential manner and for the length of the contract. RC archived files in a complete, secure, and confidential manner and for the required period of time as mandated by applicable federal and West Virginia rules and regulations. So that our staff are always current, we review policies and procedures at staff meetings, and with staff who are uncertain or need a reminder on how to complete a task. The manual will be available in both printed and electronic formats, and will be available to all staff.

West Virginia RCs and appropriate staff will manage the enrollment process and communication with members, responsible representatives, DCSWs and the Bureau staff. All communications with members and DCSWs are logged in our server-based CRM. This ensures that any Consumer Direct staff member coming into contact with a member or DCSW can pick up from where the previous conversation left off. This creates continuity of

care for the member or DCSW, and expedites the resolution of any issues. The CRM provides a secure, HIPAA compliant tool to maintain up-to-the-minute status of any person in our system.

Our CRM system allows for all Consumer Direct staff who have contact with members or DCSWs to securely log all communication interactions in one system. This adds a layer of security for all staff as they attempt to work through whatever issues may arise. This serves as the tracking system for how our staff communicate with a member or DCSW.

The portal provides secure and confidential access to service delivery information for all parties involved in member care: members, case managers, and Bureau. The portal functions reliably and efficiently as an instrument for employee time entry and member time approval. The portal also extends service capabilities to support mileage entry/approval, task entry/approval, utilization review, report request/review, employee paystub review, and delegated employee/member profile maintenance. In addition, the portal provides a secure communications capability to enable messaging between users. The portal is mobile-friendly, and can be used effectively on smartphones, tablets, and full-size computer screens. Our portal is HIPAA compliant, secure, and confidential. All access is role-based, meaning every user is associated with a specific role, and that role has access to only certain types/amounts of information. For instance, a case manager would have access to their members' information, while a member's access would be restricted to their information.

4.114 The Vendor should have a master checklist for each file type to ensure that all required documents are included in each of these files used by the operating agencies for each of the waiver programs.

We employ a proficiency tracker tool which serves as a master checklist designed and developed for each program we work with. The tracker enables our internal quality improvement team to monitor document submission and expiration as related to specific program requirements.

4.115 The Vendor should have a master checklist for each type of archived files to ensure that all required documents are included in each of these files. Any and all HIPAA requirements should be met.

Our proficiency tracker tool serves as a master checklist designed and developed specifically for each program we work with. the checklist is maintained on our secure server which meets all HIPAA requirements.

4.116 The Vendor should meet any and all HIPAA requirements for current and archived files and documentation.

Consumer Direct meets any and all HIPAA requirements for current and archived files. provides internet accessible websites to deliver a broad set of features and capabilities in a secure and HIPAA compliant manner to members, representatives, DCSWs, individual-directed goods and services vendors, waiver case managers, Resource Consultants and the general public. Access to information and services is based on each user's specific role.

4.117 The Vendor should establish and adhere to an incident handling procedures outlining the steps and related timeframes to report, document, mitigate, and recover from computer/network and HIPAA security breaches and noncompliance.

Consumer Direct is committed to safeguarding the privacy of health information in both electronic and paper formats. When exchanging data with partners, Consumer Direct sends and receives data securely via electronic data interchange. It is both our policy and our practice to maintain HIPAA compliant associate agreements with all applicable business partners. To continually strengthen our compliance measures, we:

- *Train our staff on the use and exchange of electronic Protected Health Information (ePHI).*
- *Document software and hardware maintenance.*
- *Never release or divulge Personally Identifiable Information (PII) without an approved release of information form from the member.*
- *Comply with HIPAA's breach and notification and requirements.*
- *Equip all offices with printed HIPAA policy manuals.*
- *Maintain an electronic copy of the manual on the company's shared drive for easy access to up-to-date requirements and policies.*

Consumer Direct's policies ensure that PHI is stored safely, maintains PHI accessibility only to those given clearance, and protects information from being shared beyond those approved for access. Our experienced IT technicians actively support, automate, and put into effect HIPAA's security requirements through our computer systems. Via software, hardware, and cloud based networks, IT delivers services from two data centers: a primary facility located in Washington and a secondary facility in Montana. Our Washington data center is a Tier 3 facility with redundant capacity components and multiple independent distribution paths serving all equipment. The data center utilizes state-of-the-art electrical and mechanical systems to provide high-availability and system resiliency. Consumer Direct systems run on Dell hardware across a Cisco data network. Additionally, IT works closely with the company's Policy, Risk, and Quality Improvement departments to ensure HIPAA security breaches are prevented. To date, our security measures have been highly effective and include:

- *Storing information on multiple secured servers in different geographic locations to protect the information in the event of a disaster. Designated roles and associated responsibilities limit access to PHI and assure HIPAA compliance.*
- *System capabilities allow quick and easy internal functions to institute immediate changes to access levels per changes of employment or job responsibilities.*
- *Protecting access by password, compelling a new password every 30 days, recording inappropriate and attempted logins, and automatically logging off inactive users.*
- *Encrypting relevant emails through ZixCorp to ensure confidentiality.*
- *Recording and reviewing of activity and information systems to identify and respond to unauthorized access.*
- *Consumer Direct's HIPAA manual includes written policies, procedures, and internal controls. It explicitly segregates duties for all tasks related to processing payroll and annual independent CPA reviews of our internal controls.*

We invite Bureau staff and members to communicate directly with us using HIPAA compliant secure email. Secure email is sent through ZixCorp to ensure confidentiality. Consumer Direct will also comply with all secure communication methods designated by Bureau.

4.118 The Vendor should establish and maintain a Business Continuity and Resiliency Plan and a Disaster Recovery Plan for maintaining back-up files and for restoring software and files, as needed.

Consumer Direct has a documented and tested Disaster Recovery Plan (Business Continuity and Resiliency Plan) that ensures continuity of operations and recovery of hardcopy and electronic records. The foundation of the Consumer Direct computing environment is two data centers – one in Missoula, Montana and the second in Lynnwood, Washington – that operate and are monitored twenty-four hours a day. The data centers provide services to handle data, voice, network, program management, and financial management services for the enterprise. This IT infrastructure is designed to be secure, highly available, redundant, and scalable in both data centers. Each site is environmentally controlled, with redundant power, multiple levels of physical security, and remote manageability.

We maintain the data necessary to sustain business operations in both data centers on a SQL Server 2012 platform. The primary platform replicates continuously to the data center in Missoula. In the event of a catastrophic failure in either site, the alternate site can be designated as the primary site within minutes. This method of delivering 'high availability' follows industry standards and best practices.

As an example of our Disaster Recovery Plan, we include Appendix C: Business Continuity Plan. This sample is pulled from our work in Colorado and will be updated to West Virginia specifications upon award of contract.

4.119 The Vendor should periodically (annually) test its Business Continuity and Resiliency Plan and a Disaster Recovery Plan. Results of testing of the Vendor's Disaster Recovery Plan should be available and provided to the Bureau, its designee, and member/representative employers within in seven (7) working days of a request.

We will (annually) test our Business Continuity and Resiliency Plan and a Disaster Recovery Plan. Results of testing of the Vendor's Disaster Recovery Plan should be available and provided to the Bureau, its designee, and member/representative employers within in seven (7) working days of a request.

4.120 The Vendor should make all documents and records available for receipt and inspection by the Bureau, its designee, and member/representative- employers, within seven (7) working days of a request.

All documents and records will be made available for receipt and inspection by the Bureau, its designee, and member/representative- employers, within seven (7) working days of a request.

4.121 The Vendor should dis-enroll member/representative-employers from receiving Subagent F/EA FMS and terminate their employment status when they stop being an employer for any reason.

Consumer Direct responds quickly and efficiently to notification of disenrollment. For instance, in 2016, 2,355 members disenrolled for a variety of reasons including losing eligibility, needing a higher level of care, or death. Upon notification of disenrollment via a

HIPAA 834 FILE, Consumer Direct will end the authorization, and begin the process of terminating the agent relationship.

4.122 The Vendor should describe their plan/process to revoke the IRS Form 2678, Employer/Payer Appointment of Agent with the member/representative-employer, when appropriate, per IRS Form instructions.

This includes revocation of Form 2678, Employer/Payer Appointment of Agent and Form 8821, Tax Information Authorization.

4.123 The Vendor should maintain a copy of the revoked IRS Form 2678, Employer/Payer Appointment of Agent, and IRS Notice of Agent Revocation in the member/ representative employer's archived file, per IRS Form instructions.

Copies of the notification of disenrollment, Form 2678, Form 8821 revocations, and the related IRS Notice of Agent Revocation (IRS LTR 4228C) are filed and stored in the individual's electronic file.

4.124 The Vendor should revoke the IRS Form 8821 with the participant/authorized representative-employer, when appropriate and per IRS Form instructions.

Both Form 2678, Employer/Payer Appointment of Agent and Form 8821, Tax Information Authorization are revoked when appropriate.

4.125 The Vendor should maintain a copy of the revoked IRS Form 8821, Tax Information Authorization in the participant/authorized representative-employer's archived file.

Form 8821 revocations, and the related IRS Notice of Agent Revocation (IRS LTR 4228C) are filed and stored in the individual's electronic file

4.126 The Vendor should retire the member/representative-employer's FEIN, when appropriate. Note: If the member/representative-employer is deceased, the IRS would like to know this when being informed that an FEIN needs to be retired.

If Consumer Direct has enrolled an individual as an employer, and then no longer represents that individual as their F/EA for payroll services, we revoke IRS Form 2678 by filing Form 2678 with the IRS to revoke the Appointment of Agent.

4.127 The Vendor should maintain a copy of the documentation of the FEIN retirement in the participant archived file.

Upon completion of filing, Consumer Direct staff scan and maintain the form to each member/representative-employer's electronically archived file.

4.128 The Vendor should withhold, file and deposit final West Virginia state income tax (even when the final filing is zero wages) for each applicable member/representative-employer.

Consumer Direct will file and pay state unemployment insurance in accordance with West Virginia law. Reports will be filed quarterly for each employer, including zero wage reports.

SUTA wages will be reported, but not paid until the threshold limit of \$1,000 per quarter is reached.

4.129 The Vendor should maintain a copy of the final West Virginia state income tax withholding filing and deposit documentation and related correspondence in the member/representative-employer archived file.

Upon completion of filing, Consumer Direct maintain the form to each member/representative-employer's electronically archived file.

4.130 The Vendor should compute, withhold, file and deposit final West Virginia unemployment taxes (even when the final filing is zero wages) for each applicable member/ representative employer.

Even when the final filing is zero wages, we will compute, withhold, file and deposit final West Virginia unemployment taxes, for each applicable member/ representative employer.

4.131 The Vendor should maintain a copy of the final West Virginia unemployment tax, filing and payment documentation and related correspondence in each member/representative employer's archived file.

Upon completion of filing, Consumer Direct staff scan and maintain the form to each member/representative-employer's electronically archived file.

4.132 The Vendor should compute, withhold, file and deposit any final municipal taxes per municipality requirements.

We will compute, withhold, file and deposit any final municipal taxes per municipality requirements.

4.133 The Vendor should maintain copies of all documentation and related correspondence in each member/representative-employer's archived file.

Upon completion of filing, Consumer Direct staff scan and maintain the form to each member/representative-employer's electronically archived file.

4.134 The Vendor should retire the member/representative-employer's West Virginia Department of Taxation and Bureau of Employment Programs, Unemployment Insurance employer identification numbers.

Consumer Direct retires the member/representative-employer's West Virginia Department of Taxation and Bureau of Employment Programs, Unemployment Insurance employer identification numbers.

4.135 The Vendor should maintain copies of all documentation and related correspondence in the member/representative-employer's archived files.

4.136 The vendor should retire the member/representative-employer's municipal tax account and identification number per municipality requirements. The Vendor should maintain the

documentation and related correspondence in the member/representative-employer's archived files, The Vendor should inform the state department of labor of any DSCWs no longer employed due to the member/representative-employer when he/she stops being an employer for any reason.

Consumer Direct will retire the member/representative-employer's municipal tax account and identification number per municipality requirements and inform the state department of labor of any DSCW no longer employed due to the member/representative-employer when he/she stops being an employer for any reason. We will maintain these completed forms in the appropriate electronic file.

4.1.37 The Vendor should maintain documentation and related correspondence with the state department of labor in each DSCW's archived file.

Documentation and related correspondence will be maintained in the member/representative-employer's archived files.

4.1.38 The Vendor should coordinate and communicate the role, responsibilities and its activities of their Subagent-F/EA FMS and Resource Consultant Divisions with case managers, service coordinators, Utilization Management staff and Claims Payer staff regarding members who enter the Medicaid system through both traditional and self-directed options to ensure that all required procedures and forms are completed and processed so that members do not experience disruptions in service.

4.139 The vendor should establish and maintain an on-line searchable DCSW Registry.

We provide a searchable online DCSW registry (sometimes referred to as a directory) in several of the states that we work in. This feature is becoming increasingly popular as more individuals seek to self-direct their care, and more workers are interested in expanding their network. Our registry/directory is housed within our Consumer Direct website. A sample employer registry can be found online at <https://providers.consumerdirectcare.com/district-of-columbia>

4.140 The Vendor should participate in an annual quality review conducted by BMS or its contractor using the quality review tool and web-based systems approved by BMS.

Consumer Direct welcomes annual quality reviews. We will fully participate in reviews conducted by BMS or its contractor using the quality review tool and web-based systems approved by BMS.

4.141 The Vendor should propose a plan to develop, implement, and maintain a system for collecting information on and following up with members and their representative enrolled in the Medicaid waiver programs and/or participants in the Take Me Home and have expressed an interest in using participant-directed services.

Use of the customer relationship management (CRM) software allows us to accurately and comprehensively collect information and follow-up with members and their representative enrolled in the Medicaid waiver programs and/or participants in the Take Me Home and have expressed an interest in using participant-directed services. Follow-up calls to self-directed members will be documented in the CRM. Consumer-directed members in waiver programs

who need additional training will find that whether they reach their original Resource Consult, or a representative in the customer service center, our staff will be knowledgeable about their background and well-equipped to help.

We look forward to working with the Bureau to ensure that our well-established plans of operation meet the expectations and requirements of the Bureau's self-directed waiver programs and participants in Take Me Home (TMH) participant-directed services.

4.142 The Vendor should propose a plan to develop and implement a system for receiving and processing member enrollment, DCSW employment and vendor information including the preparation of enrollment and employment packets and monitoring the effectiveness of the system.

Consumer Direct is accustomed to receiving and processing member, DCSW employment, and vendor information packets. Upon enrollment by an RC of a member, the RC uploads the completed enrollment packet to our centralized Document Review department. Upon receipt, a document review associate reviews all fields in the packet to ensure that the enrollment process has addressed all requirements. Each document review associate is assigned a particular state so that he/she is intimately familiar with that state's requirements and regulations. If the associate finds something missing or finds that something has been completed incorrectly, he/she alerts the RC and the document in question is corrected. This process has proven effective in other states, and we will adapt it to the Bureau's specific requirements.

4.143 The Vendor should propose a plan to develop, implement and maintain an electronic system for receiving, responding to, tracking all communications from any source (including complaints and grievances) and maintaining an automated log that addresses (1) who made the call, (2) who received the call, (3) the reason for the call, (4) action taken, (5) if any mandatory reporting occurred, and (6) the final resolution of the issue presented.

Our Customer Relationship Management (CRM) software system for tracking calls from members, representatives and DCSWs during and after regular business hours. Program staff immediately log calls from members and DCSWs into the member or worker's electronic file with the date and time the call was received, purpose of the call, and name of the person who received the call. If the call was received after business hours, we log when the call was returned (date and time), by whom, and what the follow-up plan is, if needed. Should any mandatory reporting incident be reported, that is also recorded. We enter general calls with the name of the caller and other data previously listed. Our policy mandates one (1) business day to return phone calls. The same features will be available for logging all the Bureau information.

"They make sure the problem is solved."

~ Consumer Direct 2016 Customer Satisfaction Survey respondent.

4.144 The Vendor should propose a plan to respond to all member and representative communications within one (1) business day from receipt of the communication.

Consumer Direct launched the Customer Service Center in 2015 to ensure members and DCSWs receive attentive response times if their program coordinator is unavailable. The Customer Service Center offers an expanded ability to answer questions and provide support to members and DCSWs. The Customer Service Center helps us resolve many recurring issues in real-time with one of our customer support staff over the phone. We maintain the common standard across our companies that all calls to the Customer Service Center will be returned within one (1) business day. All customer service contact, web portal use, and other services for members and workers come free of charge.

Centralized customer service support compliments our West Virginia-dedicated program coordinators, and enables streamlined service delivery and efficient operations behind the scenes. We believe this is one more way that our excellent customer service sets us apart from our competitors.

Consumer Direct staff nationwide follow a policy of returning phone calls within one (1) business day. A 24/7, toll free, high speed fax line is available to members and DCSWs.

4.145 The Vendor should propose a plan to develop, implement and maintain an electronic system for identifying and reporting critical incidents to the Bureau within 48 hours of becoming aware of the incident.

We track all complaints, grievances, and critical incidents submitted via our portal, our website, over the phone, via secure email, or in person, via our CRM system and will report incidents through the State's web-based Incident Management System (IMS) within 24 hours of being informed of the incident. We will include the date of incident, type of incident, individuals involved, and a summary of the incident. We recognize that critical incidents require a subsequent update to the IMS to document outcome and resolution of the incident.

Complaints are also tracked in our CRM for resolution regardless of the source, and new profiles are created to assist our staff in tracking complaints for vendors or providers if they do not already exist in our system.



Figure 6: Critical Incident Reporting

We maintain a strong fraud prevention program that focuses on prevention, detection, and response. Steps for reviewing reports of fraud, abuse, or other related incidents involving members we serve are highlighted in Figure 6: Critical Incident Reporting. Excellent member education is the first step towards fraud prevention. We find that many members don't know what fraud is, and when they have been educated about Medicaid fraud, incidents of fraud decrease. We maintain a toll free Compliance Hotline, and offer training in both print and with a short video. Ongoing trainings to both staff and members bolster our efforts to prevent Medicaid fraud. Reports of fraud or abuse fall under our larger Critical Incident Reporting (CIR) process and steps to investigate, resolve, and report suspected occurrences of fraudulent or abusive activity are in line with our CIRs process.

4.146 The Vendor should propose a plan to identify any cases of substandard performance on the part of a member or representative, or a staff from Subagent- F/EA FMS or RC Divisions and the Vendor should notify the individual and the Bureau of the substandard performance identified, provide appropriate remedial skills training as appropriate, work with the member/representative to develop and implement a written plan of correction to address the area(s) identified for correction, monitor the successful implementation of the corrective action plan by the member/representative and inform the Bureau of final disposition and any need to initiate involuntary termination proceedings with the member/representative. Examples of substandard performance include, but are not limited to:

4.146.1 Repeated or intentional incorrect reporting and/or late submission of DCSW time sheets.

4.146.2 Incorrect and/or late submission of invoices for individual-directed goods and services.

4.146.3 Hiring of ineligible DCSWs.

- 4.146.4 Monthly or cumulative over-utilization of the member's individual-budget.
- 4.146.5 Ineffective emergency DCSW back-up plan.
- 4.146.6 Significant firing of DCSWs.
- 4.146.7 Performing out of compliance with the waiver program terms and conditions.

Consumer Direct's CRM and reports server are used to track all performance indicators described in sections 4.146.1- 4.146.7 above.

A report will be to track these measures and should any be met, a member's RC will be notified. The RC will follow-up on the notification as prescribed by the policy and procedure manual. The policy and procedure manual will instruct the RC to act in accordance with program requirements. Accordingly the RC will inform the Bureau of the substandard performance identified, provide appropriate remedial skills training as appropriate, work with the member/representative to develop and implement a written plan of correction to address the area(s) identified for correction, monitor the successful implementation of the corrective action plan by the member/representative and inform the Bureau of final disposition and any need to initiate involuntary termination proceedings with the member/representative.

4.147 The Vendor should propose a plan to develop a complaint and grievance procedure that includes an Advisory/Grievance Committee composed of members and representatives that meets either in person or via teleconference at least quarterly to discuss the provision of Subagent - F/EA FMS and RC and to evaluate any grievances filed or feedback provided by members and representatives, and provides a monthly report at least one week prior to the monthly scheduled meeting beginning first month after award and a contract meeting to the Bureau outlining complaints received and resolutions achieved and key issues related to the performance of the Vendor.

As mentioned in response to 4.104.15 and 4.104.16, responding to complaints and grievances is an integral part of our training. We will develop a plan that includes an Advisory/Grievance Committee that includes members and representatives to foster ongoing feedback from self-directed members/representatives about the Bureau's self-directed programs, and about Consumer Direct's role in those programs as the Subagent F/EA FMS and Resource Consultant.

We will meet the Bureau's requirement of providing a monthly report at least one week prior to the monthly scheduled meetings. We have experience working with a similar advisory committee in our work in Colorado. The Participant Directed Programs Policy Collaborative (PDPPC) works with Colorado's Department of Health Care Policy and Financing (HCPF). As the Training and Operations vendor for HCPF, we attend the monthly PDPPC meetings as do several of our Peer Trainers.

We look forward to working with the Bureau to develop a committee that can provide important feedback and opportunities for program and vendor improvement.

4.148 The Vendor should propose a plan to develop and distribute a Member/Representative-Employer Handbook that provides information about the participant-directed services, the role, responsibility and function of Subagent-F/EA FMS and RC and the role and responsibilities of the member, representative and DCSW, and on the member/representative performing employer-related tasks.

Consumer Direct has developed and distributed member/representative handbooks for a number of programs for different states. We will work with the Bureau and incorporate the best elements of West Virginia's existing handbooks for self-directed programs to create a user-friendly, comprehensive manual that supports members/representatives to understand their roles and responsibilities in self-direction.

To see a few examples of existing Consumer Direct handbooks, please visit our websites for programs in Florida and Wisconsin, www.consumerdirectfl.com and www.consumerdirectwi.com. You will find employer handbooks under the Forms tab on these sites.

4.149 The Vendor should propose a plan to develop, implement, analyze and summarize the results of a Member/Representative Satisfaction Survey and submit a report to the Bureau annually that should include a plan of correction for the Subagent-F/EA FMS and RC based on the results of the Survey. The Survey developed and the format for the annual report will be approved by the Bureau.

Consumer Direct has extensive, proven policies and procedures in place to meet and exceed the bureau's requirements for determining degree of customer satisfaction for FEA and Resource Consult program delivery. Our deeply-held belief in self-direction drives us to provide each state partner with exceptional customer service. Outstanding ratings on customer satisfaction surveys and our programmatic and contractual deliverables reflect our commitment to quality service.

We value member and DCSW satisfaction as a reflection of the quality of our service delivery. Our quality improvement team is responsible for distributing, logging, and reporting on annual satisfaction surveys for every program we oversee. We also allow for submission of comments, questions, or concerns with program delivery at any time either directly to our program staff or via our state-specific website. Results of surveys are used to help identify any existing needs for improvement to ongoing program operations that can be adjusted to better meet the needs of our members and their DCSWs. Survey results can be cause for potential adjustments in program delivery.

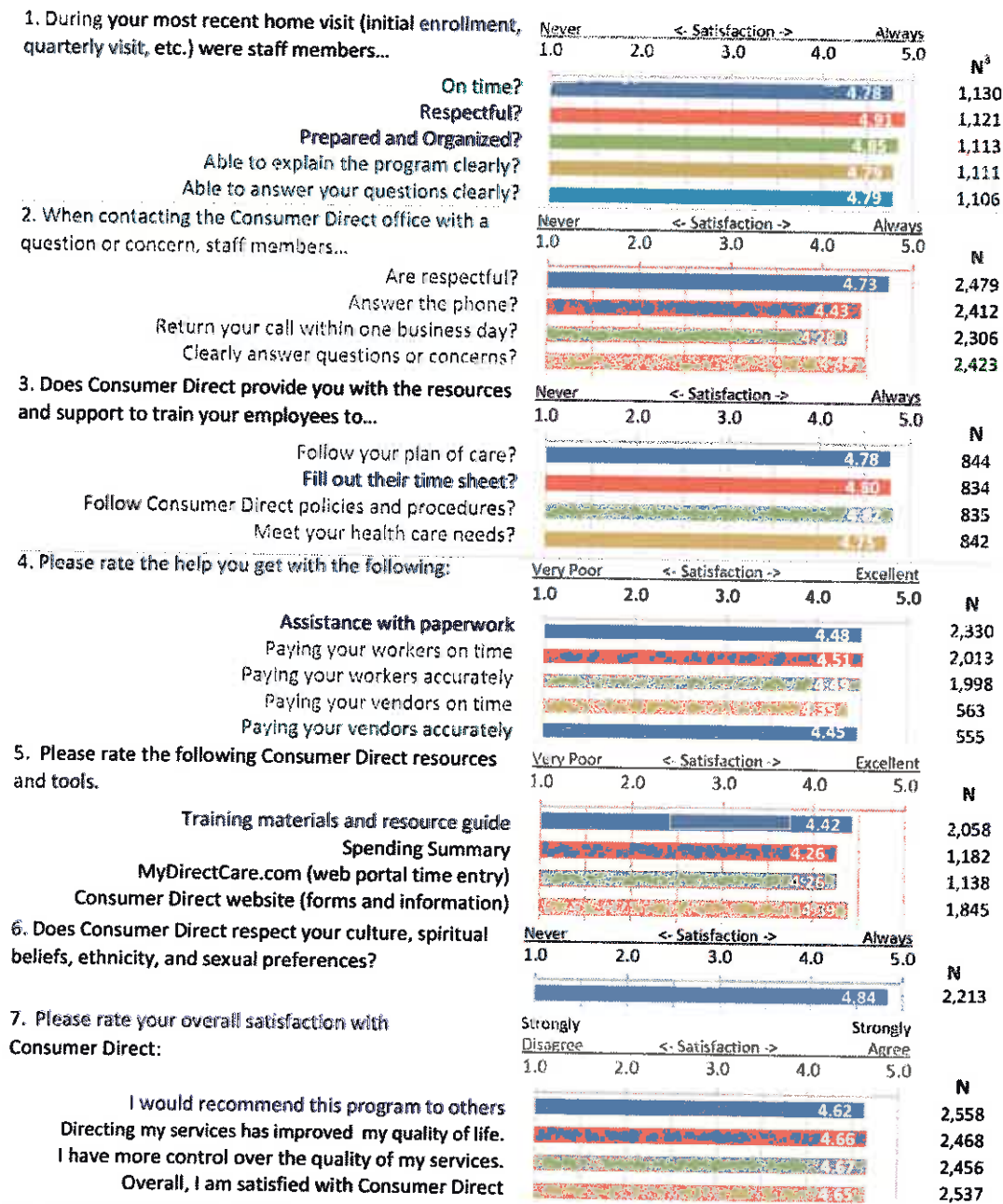
Consumer Direct implements corrective action plans resulting from Executive team review of customer satisfaction reporting and other sources of complaints shortly after the development of the corrective action plan. Consumer Direct staff will communicate directly with designated Bureau staff in the event this timeline cannot be met, with an explanation of the circumstances and an overview of the steps being taken to complete corrective action.

Consumer Direct consistently averages 4.5+/5.0 stars on our annual customer satisfaction surveys. Our uniformly high averages are evidence that member-employers and DCSWs reliably get high-quality service from us regardless of program size or fluctuations in enrollment numbers. Below are our 2016 customer satisfaction survey results.



Figure 7: Satisfaction Survey Improvement Process

Average Satisfaction Rating² for Each Survey Question



Overall Satisfaction Rating (weighted average all questions): 4.59

¹ A total of 10,448 surveys were mailed to Medicaid service recipients in nine states asking them to rate the services provided by Consumer Direct. Results based on 2,626 returned surveys or 25.13% of the survey population. Primary service models included Agency with Choice, Fiscal Employer Agent, and Support Broker. ID, FL, NV and WI surveys conducted August through December of 2015. AK, AZ, NM, MT and TX surveys conducted January through May of 2016.

² Weighted average. Numeric 5 point Likert rating scale.

Figure 8: Consumer Direct Annual Customer Satisfaction Survey Results

4.150 The Vendor should propose a plan to have a system in place for acting as a mandatory reporter, as required by the state program agency.

Consumer Direct recognizes that, as a mandatory reporter in all of the programs we operate, it is important to maintain a system for reporting on CIRs, and we will continue this practice in a manner compliant with West Virginia statutes regarding mandatory reporting for providers to provide protections for adults who have disabilities. We report any suspected or confirmed Medicaid fraud. We also report critical incidents which may include alleged abandonment, abuse and/or neglect, fraud, and/or a member's inability to perform the required employer-related tasks.

4.151 The Vendor should propose a plan to develop and implement the provision of orientation and skills training and related materials for members and their representatives and monitor its effectiveness.

Face-to-face enrollment of members is the first step in training the member, family, representative and DCSW as to the roles of each party. Our Resource Consulting Supervisors and all RC staff serving the Bureau's members, will be trained on the specifics of Bureau's programs and the regulations related to each.

Successful delineation of responsibilities does not stop with member and DCSW training. Consumer Direct offers regular education to case managers, care coordinators, support coordinators, and state personnel on member direction, person-centered planning, and program logistics. We look forward to discussing the Bureau's interest in our

Our focus on customer service has consistently increased participation in the program, decreased complaints to the states, developed positive relationships with case managers and similar partners for service delivery, and improved members' quality of life.

4.152 The Vendor should propose a plan to develop and implement customer service training and related materials for Subagent-F/EA FMS and RC staff and monitor its effectiveness.

Consumer Direct will leverage existing customer service trainings and monitoring policies and procedures from its programs in the District of Columbia and New Mexico for Subagent-F/EA FMS and RC staff.

4.153 The Vendor should propose to plan to develop, implement and maintain a web portal, a secure web-based interactive payroll and accounts payable system that provides the Bureau, members enrolled in Personal Options, their representatives, and Resource Consultants with real time 24/7 access to member's budgets and spending history with the ability to electronically submit and monitor processing of timesheets and invoices.

Consumer Direct provides web-based access for a number of important uses. Our web-based timekeeping system delivers services through our custom web portal, which provides online services to participants/representatives, workers, case managers, and administrators. It provides access to members' referral and prior authorization data, and the web portal allows members/representatives and RCs real time access to member's budgets and spending history.

For members in Personal Options, their representatives, and our RCs, the Consumer Direct web portal provides more than basic time entry/time approval functionality. The portal supports member and DCSW communications, service task/note entry, access to reports and forms, member budgets and spending history, and processing timesheets and invoices. Our portal also allows for electronic visit verification (EVV) integration for Cures Act compliance.

Consumer Direct's web portal, at its core, delivers time entry and time approval services. These transactions are subjected to the unique business rules for the particular program and payer involved. These workflows can be complex, such as requiring task information by shift, or applying plan-of-care constraints. The goal in the time entry/approval process is to optimize the accuracy and security of the transaction in an easy-to-use interface.

The timekeeping process allows transaction entry for services that are authorized for the member, for DCSWs who are linked to the member, in the proper amount, scope, and duration. Business rules are run in real time, checking for service authorization, available budget, participant and worker eligibility, and approved pay/bill rates. The portal workflows are designed to ease entry by worker (enter, save, submit, copy schedule forward) and ease approval by member (approve, reject with note).

Consumer Direct is continually improving the web portal and adding functionality. We have recently added four major features, all improving the customer service experience:

- Plan of Care: capability to shape the service delivery experience by defining the time (day of week, time of day) specific services can be delivered (or not delivered), and their approved amount.*
- Custom workflows: configurable workflow to incorporate configurable task entry, shift notes, custom attestations (both DCSW and member), and hospitalization periods.*
- Messaging Center: a powerful platform for exchanging data with portal users, inside the portal's security boundary, allowing PHI and confidential information to flow without risk of disclosure.*
- Notification capability: a workflow to send notices to portal users (via the Messaging Center or to personal email/text) about transaction processing activity/results that initiated in the portal, or in other backend systems (such as payroll).*

Planned initiatives for the web portal include delivering more information for DCSWs and members (via the Messaging Center), integrating vendor payments (from transaction entry to payment), and more extensive EVV integration.

Delivering an optimal user experience in the web portal is a continual challenge. Users want a quick and seamless process; payers and policy makers want more data and more controls. Those two factors don't necessarily mix well, but they can be addressed with success, as demonstrated in the Consumer Direct web portal. In addition, users are demanding more functionality be delivered on a mobile device, especially a smart phone, which highlights the need to capture necessary functionality in a lightweight interface.

In addition to our own portal capabilities, we also have experience working with an EVV vendor in New Mexico. Should the Bureau determine they want to implement EVV earlier than January 2019, we will be well positioned to discuss this with the state, and support the Bureau's processes, members and DCSWs.

Consumer Direct safeguards Medicaid funds and has several systems in place to review for appropriate time submission. Whenever possible, we advocate for the submission of time electronically via our online portal. Accuracy of timesheets is greatly improved when workers can submit time through our web portal, which allows us to integrate business rules that reflect program rules, and therefore require the worker to enter time within set parameters or prevent time entry for services not authorized or for time worked outside of program limits.

Our portal is HIPAA compliant, secure, and confidential. All access is role-based, meaning every user is associated with a specific role, and that role has access to only certain types/amounts of information. For instance, a case manager would have access to their members' information, while a member's access would be restricted to their information. We understand there are members/representatives, family members and others who may have concerns about ease of use of a web-based technology. We will assist and train all users to the portal, and are accustomed to working with people who may have some reluctance to learn it. We will work with those people and determine their best alternative if the web portal is not something they can learn.

4.154 The Vendor should propose a plan to verify that the Vendor will not bill the Bureau in advance for participant-directed goods or services.

Consumer Direct will not bill the Bureau in advance for participant-directed goods or services. Across all our programs, we do not bill in advance but rather after a transaction has taken place.

4.155 The Vendor should describe their plan for processing invoices and payments for Aged and Disabled and Traumatic Brain Injury Waiver Community Transition Services on approved Transition Plans including the process for qualifying vendors of these services. Members will not exceed 100 members per calendar year and each member may only be served for a maximum of twelve months which may be consecutive or intermittent. The Vendor should also describe their reimbursement plan for the above Community Transition Services.

Consumer Direct will leverage its existing policies and procedures to develop a specific plan for processing invoices and payments for Aged and Disable and Traumatic Brain Injury Waiver Community Transition Services.

Consumer Direct processes all requests for invoices and payments from qualified and approved vendors in accordance with the member's care plan and budget. Pre-authorized goods and services are recorded and matched to vendor payment requests to determine that amounts are authorized and for the purpose of generating spending/utilization reports. All requests are maintained in the member's electronic file.

We employ an electronic document management system to produce a work flow that ensures we will meet all requirements for invoicing for goods and services. Invoices are

reviewed, approved and scanned at the local office and routed to the accounting office electronically for prompt payment by the Accounts Payable department.

Our reimbursement plan is reflected in Attachment C: Cost Sheet. As indicated in the Cost Sheet, we propose a PMPM that would be paid any month in which a member activates a vendor payment. We recognize that the number of members annually will not exceed 100, and that each member may only be served for a maximum of twelve months which may be either consecutive or intermittent.

Attachment B: Mandatory Specification Checklist

5.1 Mandatory Requirements

The following mandatory requirements must be met by the Vendor as a part of the submitted proposal. Failure on the part of the Vendor to meet any of the mandatory specifications shall result in the disqualification of the proposal. The terms "must", "will", "shall", "minimum", "maximum", or "is/are required" identify a mandatory item or factor. Decisions regarding compliance with any mandatory requirements shall be at the sole discretion of the Purchasing Division.

5.1 The Vendor must perform the Subagent-F/EA FMS and RC tasks as a Subagent to the West Virginia Government F/EA FMS (the Bureau) directly and without the use of a subcontractor.

Consumer Direct is fully capable and prepared to perform both F/EA FMS and RC tasks as the Subagent to the Bureau. We will not subcontract any of this work to another entity.

5.2 The Vendor must provide both F/EA FMS and Resource Consulting (RC) directly and not subcontract with another entity to perform any of the related tasks.

Consumer Direct is fully capable and prepared to provide both F/EA FMS and RC services to the Bureau. We will not subcontract any of this work to another entity.

5.3 The Vendor must develop and maintain a Subagent FEA FMS Policy and Procedures Manual within 30 calendar days' contract award and update said manual at least annually.

As an experienced F/EA FMS organization in several of the 14 states in which we operate, we are accustomed to developing and employing detailed policy and procedure manuals outlining procedures for enrolling and obtaining FEINs for members, hiring workers, tax filing procedures, workers' compensation procedures, and ongoing payroll procedures. Appendix B references some of the policies and procedures we have in place governing our F/EA FMS programs. This CDWV's Policies and Procedures manual will be submitted to the Bureau for approval within at least 30 calendar days of contract award, and will be updated at least annually.

5.3 The Vendor must maintain an auditable system for managing members spending plans, payroll processing and related reporting, and claims submission.

Consumer Direct leverages numerous technology systems and processes to deliver the services covered in this procurement. These systems provide capabilities for members to manage their spending plans, for payroll to be processed and reported, and for claims submission. These systems are auditable in that we welcome the Bureau to review and audit them at any time. These systems are provisioned through commercial-off-the-shelf applications (Microsoft Dynamics Solomon, Microsoft Dynamics CRM, for example) which are licensed from the manufacturer, and are supported by our experienced staff who are well-versed in the intricacies of the Microsoft operating system. Consumer Direct also utilizes

a collection of custom applications that are proprietary to the company: a member/worker web portal, a payroll processing platform, and a claims processing platform.

5.4 The Vendor must have and maintain the capacity to receive funds by electronic funds transfers (EFT).

Consumer Direct has the capacity and is accustomed to receiving state funds by EFT.

5.5 The Vendor must, as a Subagent - F/EA FMS and RC, establish and maintain a separate administrative bank account for the sole purpose of receiving all payments from the Bureau for Medicaid-funded self-directed services rendered and Subagent - F/EA FMS and RC administrative fees. The Bureau may, at any time and at its discretion, audit the Vendor's administration and use of public funds including the management of the separate administrative bank accounts for each Waiver Program

Consumer Direct is accustomed to maintaining separate administrative bank accounts and maintaining full transparency with state contracts so the state may have complete confidence that state funds are managed responsibly and in full accordance with the contract.

5.6 The Vendor must receive, disburse, and track Medicaid and State funds as stated in section 4.28 of this RFP.

Consumer Direct prepares and bills for expenditures disbursed based on the approved plan of care and spending; and will make refunds to West Virginia Medicaid as appropriate. The accounting system tracks the required spendings and authorizations accurately. Our electronic document management system and a well-established accounting and information system for receipt and disbursement of Medicaid funds. We will adapt this system for use with the Bureau programs, and for tracking all transactions and balances.

5.7 The Vendor must have a process for reimbursing the State for any funds remaining in the separate bank account for managing participant-directed funds on June 30 of each state fiscal year.

We recognize the role of the Subagent F/EA FMS is to process approved payroll and approved payment for all self-directed services and goods delivered to members in the program ahead of reimbursement from the state. Therefore, we do not anticipate that unexpended funds will need to be reimbursed to the state often. We appreciate that at times, and for various reasons, members may not use or require the use of their full authorized budget. RCs and other appropriate CDWV staff will work directly with members through the duration of their self-directed care to ensure budgeted services are being monitored, and that reasons or circumstances surrounding the unexpended funds be communicated to Bureau staff for consideration in the member's reauthorization. RCs will work with members to ensure their budgets are managed appropriately and will request a budget modification in the event it is necessary for the member to receive the appropriate level of care.

5.8 The Vendor must propose a plan to establish, operate and maintain a customer service system that serves members and their representatives, RCs and DCSW and service providers and vendors in accordance with the principles of participant direction and in a culturally and linguistically sensitive manner. All communication methods should be accessible, including

alternative formats upon request. The Vendor should describe the system and written policies, procedures and internal controls that will be used to implement and perform the following tasks:

- 5.8.1** Have a toll-free number with voice mail functional capabilities.
- 5.8.2** Have a TTY line or alternative method of communicating with members and their representatives with hearing impairments.
- 5.8.3** Have a functioning fax machine and number.
- 5.8.4** Have internet e-mail capacity.
- 5.8.5** Have website available to members and their representatives, and the general public, that includes up-to-date information and internal controls documented for its West Virginia-specific Subagent-F/EA FMS — RC Policies and Procedures Manual to monitor the accuracy and currency of the materials posted on the website and the effectiveness of the system.
- 5.8.6** Develop, implement, and maintain a web portal, a secure web-based interactive payroll and accounts payable system that provides the Bureau, members enrolled in Personal Options, their representatives, Resource Consultants, and Service Coordinators/Case Managers (if applicable) with real time 24/7 access to member's budgets and spending history with the ability to electronically submit and monitoring processing of timesheets and invoices.
- 5.8.7** Will agree to locate, operate, and maintain a customer center in-state office within fifteen (15) miles of the city limits of Charleston, West Virginia due to the need for continuous and constant on-going site meetings, interactions, and case updates with BMS staff that is more collaborative and effective than e-mail, telephone contact, or video conferencing. Hours of operation are at a minimum 9:00am to 5:00pm (EST/EDT) Monday through Friday excluding West Virginia State holidays: New Year's Eve 12 noon to 5 pm, New Year's Day, Martin Luther King Day, President's Day, Primary Election Day, Memorial Day, West Virginia Day, Independence Day, Labor Day, Columbus Day, General Election Day, Veterans' Day, Thanksgiving Day and the day after Thanksgiving, and Christmas Eve 12 noon to 5 pm, and Christmas Day. Must have a voicemail box activated for after-hours receipt of messages for members using self-direction services and their representatives and DCSWs to access needed information concerning their services for member/representative-employers to access needed information concerning their services.
- 5.8.8** Have the ability to provide translation and interpreter services that are compliant with the Language Access Act of 2008. <https://www.congress.gov/bill/110th-congress/house-bill/5759>. And the ability to provide materials to members and representatives in alternative print (i.e., large print and Braille).

Consumer Direct is prepared to meet and exceed the customer service expectations outlined as requirements in 5.8.1 to 5.8.8.

The Customer Service Center provides consistent telephone and customer service support to West Virginia members and DCSWs. Using a toll-free telephone system, the Customer Service Center ensures that all calls are answered within four (4) rings or less Monday through Friday, during regular business hours of 8am to 5pm Eastern time. Callers outside of these hours will be offered voicemail capabilities. We will recognize state of West Virginia holidays and will close the office in conjunction with those holidays. Consumer Direct provides a high level of customer service in the Customer Service Center, and we can ensure that wait times to speak to a representative will be no longer than one (1) minute. Calls received through the Customer Service Center are recorded in our CRM to ensure seamless communication between Customer Service Center staff and West Virginia-dedicated program coordinators. The CRM ensures that either staff can pick up a

conversation or issue where another staff left that issue. A TTY line and alternative communication modes are available for callers with a hearing impairment.

West Virginia's program will have a unique web-site developed specifically for West Virginia members, representatives, DCSWs, Bureau and state staff and any other stakeholders identified by the Bureau. All required forms, manuals, trainings will be available through this site. For an example of a state-specific site and its functionality, including access to the portal and Provider Directory, can be found here: www.consumerdirectdc.com

Our web-based timekeeping system delivers services through our custom web portal, which provides online services to members/representatives, DCSWs, RCs, and administrators. Our web portal provides more than basic time entry/time approval functionality. The portal supports member and DCSW communications, service task/note entry, access to reports and forms, and electronic visit verification (EVV) integration.

In addition to tracking time, the portal provides an automated interface system in which individual members can view 'real-time' expenditures against their approved or budgeted services amount, message their DCSWs directly, log notes related to service delivery, and obtain tax-related information.

Use of the portal provides the most rapid access to a variety of tasks as mentioned in this section.

We recognize the importance of assisting members to be cognizant of their spending. Members using the portal for timesheet submission will receive real-time alerts as to where they stand relative to their available budget. To facilitate effective use of the portal, we also have West Virginia-based and customer service center staff available during regular business hours to answer questions and concerns from members DCSWs should any arise.

Consumer Direct firmly believes in the value of locally-based staff in every state where we work. We look forward to operating and maintaining a customer center in-state office within fifteen (15) miles of the city limits of Charleston, West Virginia.

Consumer Direct takes culturally sensitive, person-centered approach to providing information, assistance, and training. We employ a culturally diverse group of people who are trained in Person Centered philosophy. For each new program we implement, we develop policies and procedures to emphasize the application of the philosophy of member direction and being culturally sensitive in all business practices in order to communicate effectively with a diverse population of members of all ages and with a variety of needs, disabilities and chronic conditions.

To further illustrate our desire to be respectful to all members regardless of their cultural background, below is a snapshot from the cultural sensitivity portion of our Customer Satisfaction Surveys. Cultural Sensitivity Customer Satisfaction Survey Results

6. Does Consumer Direct respect your culture, spiritual beliefs, ethnicity, and sexual preferences?



Figure 9: Cultural Sensitivity Customer Satisfaction Survey Results

Consumer Direct will provide Bureau staff, members, DCSWs, and vendors with the option of reaching us by toll free phone, toll free fax number, or by secure email. We will provide Teletypewriter (TTY), or alternate methods for callers with a hearing impairment which will be operational 24/7. We maintain a dedicated 24/7 high speed fax line. Our toll free number enables callers to leave a message 24/7, to be returned within one (1) business day. Staff are each be assigned an email address ending in consumerdirectcare.com, to be made available to all relevant parties for use for communications relevant to Bureau's consumer- and self-directed programs. Consumer Direct also makes a general email address available for communication that is monitored frequently throughout each business day.

Our language assistance services are provided at no cost when requested, and may include both interpretation and translation and American (ASL) and International (IS) sign languages. Upon award of contract, Consumer Direct will establish a TTY (or TDD) system for communication with members or representatives who are hearing or speech impaired. Consumer Direct employs bilingual staff and we intend use a locally-based Small Diverse Business for translation and interpretation services and a telephone interpretation service. Our Customer Service Center employs both English and Spanish speakers. For the occasions when a member or provider needs interpretation to a language other than English or Spanish, including American Sign Language, we provide interpretation services through TeleInterpreters. Additionally, our website can be translated into hundreds of languages using the Google Translate feature. We will provide written materials in large print and Braille upon request in a timely manner in order to expedite member enrollment.

"Whenever I contact Consumer Direct I am treated with respect, professionalism and helpfulness, all in a friendly but businesslike manner. The customer service I receive from Consumer Direct is absolutely excellent, which is quite refreshing in these days of lack of or very impersonal service.

It is always a pleasure dealing with Consumer Direct."

~ Consumer Direct 2016 Customer Satisfaction Survey respondent.

5.9 The Vendor must establish a separate administrative bank account for each Self Directed Program into which all payments received from the Bureau may be deposited and should submit to the Bureau written evidence that the said bank accounts have been established. The Vendor entity should complete all forms as specified by the Bureau and the bank to establish electronic fund transfers from the Bureau to the bank account. The separate administrative bank account should be:

5.9.1. Maintained, to the extent legally permissible, in a manner that prevents creditors of the Vendor from in any way encumbering or acquiring funds in the separate bank account.

Consumer Direct will establish a separate administrative bank account for each Self Directed Program into which all payments received from the Bureau may be deposited. To the extent

legally permissible, we will maintain the accounts in a manner that prevents creditors from encumbering or acquiring funds in the separate bank account.

5.10 The Vendor must absorb all bank charges including monthly fees, and stop payment fees that were initiated by the contractor and not reduce the balance of the separate administrative bank account. It should be noted that should the participant or his/her authorized representative requests a stop payment, the fee may be charged to him or her.

Consumer Direct understands that we must absorb all bank charges including monthly fees, and stop payment fees initiated by the contractor and not reduce the balance of the separate administrative bank account.

5.11 The Vendor must not co-mingle other funds into the separate administrative bank account.

Consumer Direct will not co-mingle other funds into separate administrative bank accounts.

5.12 The Vendor must ensure that funds deposited into the separate administrative bank account could not be used by the entity or by any other agent or third party to satisfy, temporarily or otherwise, any Vendor liability or for any other purpose, except as provided under its contract with the Bureau.

Funds will be deposited into the separate administrative bank account could not be used by the entity or by any other agent or third party to satisfy, temporarily or otherwise, any Vendor liability or for any other purpose, except as provided under its contract with the Bureau.

5.13 The Vendor must withdraw from the separate administrative bank account all payments made by the Bureau for the Subagent - F/EA FMS and RC administrative fees within seven (7) calendar days of receipt.

Consumer Direct will withdraw from the separate administrative bank account all payments made by the Bureau for the Subagent - F/EA FMS and RC administrative fees within seven (7) calendar days of receipt

5.14 The Vendor must prepare and submit monthly reports to the Bureau on separate administrative bank account activity in accordance with the Bureau's reporting requirements. These requirements include monthly reporting of bank account activity, including a summary of the month's bank activity and reconciliation of the bank balance to the General Ledger.

Consumer Direct customizes reports to meet all agency reporting needs. We will provide monthly reporting that summarizes separate administrative bank account's monthly bank activity, reconciliation of the bank activity, reconciliation of the bank balance to General Ledger, and reconciliation of any amounts advanced from the Bureau.

5.15 The Vendor must provide the Bureau a copy of the monthly statement from the dedicated payroll bank account within fifteen (15) business days of the request along with any other financial information that may be necessary for the Bureau to oversee the delivery of F/EA FMS and RC services and to maintain relevant documentation in the Vendor's files.

As stated above, we customize our reports to meet all agency reporting needs. We will submit within fifteen (15) business days of request, monthly statements from the dedicated payroll bank account along with any other financial information requested by the Bureau to oversee the delivery of F/EA FMS and RC services.

5.16 The Vendor must work jointly with any subsequent Vendor upon expiration and/or termination to supply historical Employer of Record and Employee information need to ensure a smooth transition of services during the integration period

Consumer Direct works to meet the needs of members and to advance their best interests. Consumer Direct commits to being as collaborative of a partner as Bureau deems appropriate in the interest of the bureau's consumer-directed and self-directed programs for growth and success. To this end, we will collaborate openly and often with all partners for service delivery.

5.17 The Vendor must provide the Agency with sample versions of reports (see Appendix 13) at least thirty (30) calendar days prior to the Operations Start Date for the Agency review and approval. The Vendor must not begin operations without the Agency approval of reports. Report formats may include paper reports or data files. Upon the Agency request, the Vendor must supply the underlying data to support any report submitted. The data is to be in an Agency - approved electronic file format.

Sample versions of reports R1-R7 outlined in Appendix 13: The Agency-Specific Reporting Requirements, will be provided for the Agency review and approval at least thirty (30) calendar days prior to the Operations Start Date. We will not begin operations without Agency approval. Report formats will be furnished in paper or as electronic data files per Agency preference. Underlying data of submitted report is available upon request and will be provided in an Agency-approved electronic file format.

Consumer Direct's portal provides an automated interface system in which individual members can view 'real-time' expenditures against their approved or budgeted services amount, message their DCSWs directly, log notes related to service delivery, and obtain tax-related information.

Use of the portal provides the most rapid access to a variety of tasks as mentioned in this section. We recognize the importance of assisting members to be cognizant of their spending. Members using the portal for timesheet submission will receive real-time alerts as to where they stand relative to their available budget. To facilitate effective use of the portal, we also have West Virginia-based and customer service center staff available during regular business hours to answer questions and concerns from members DCSWs should any arise.

Reporting through the portal can be adjusted to meet the particular program requirements and needs of Bureau. For your reference, snapshots of both spending summaries and spending detail reports made available to members are below.

R1 Member Monthly | Monthly: Describes spending for the Spending Report current month and year-to-date and compares the amounts to the approved 12-month Service/Spending Plan and balance for each member who does not have access to the internet.

Participant Number Program Coordinator Current Suite
Rate

Phone External CM

DC Department of Health Care F - DC Dpt of Health Care Fin CDMS - FEA

| Start | End | %Time Elapsed | % Budget Used | % Difference | %Elapsed | %Remaining |
|--------------------------------------|-----------|---------------|---------------|--------------|-------------|------------|
| Auth Period: 8/4/2016 | 6/30/2017 | 58.48% | 68.96% | 10.48% | 0 | 41.52 |
| Service | Type | Budget | Used YTD | In Process | Remaining | |
| T1019 U1 X1 Risk Time | Dollars | \$1,112.60 | \$18.07 | \$0.00 | \$1,094.53 | 98.38 |
| T1019 X1 Personal Care Assistance | Dollars | \$104,927.01 | \$63,221.12 | \$9,888.65 | \$31,817.24 | 30.32 |
| Totals | Dollars | \$106,039.61 | \$63,239.19 | \$9,888.65 | \$32,911.77 | 31.04 |

R2 Discovery and Remediation Reports on Quality Indicators | Monthly: Reports % of compliance for each quality indicator and Remediation efforts.

Our internal proficiency trackers are used to ensure that all potential and current DCSWs meet program requirements prior to working in a member's home. This tracker will be adapted specific to the Bureau program requirements and used to ensure DCSWs are "ready to work" contract deliverables requiring Consumer Direct to provide reports on DCSW status to the Bureau, both initially and ongoing. Our proficiency tracker alerts us to certification expirations and areas where requirements for DCSWs remain unfilled. A sample proficiency tracker is shown below as our DCSW Credential Expiration Tracker.

CL Expiration Tracker

| 45 | Customer | Custid | Start Date | Effective | Expiration | PC Name |
|----|----------|---------|------------|------------|------------|---------|
| x | | 1184500 | 6/10/2016 | 6/12/2016 | 2/28/2017 | x |
| x | | 1184960 | 7/6/2016 | 7/1/2016 | 2/28/2017 | x |
| x | | 1184578 | 6/15/2016 | 6/13/2016 | 2/28/2017 | x |
| x | | 1185864 | 8/30/2016 | 8/29/2016 | 2/28/2017 | x |
| x | | 1185254 | 7/25/2016 | 7/27/2016 | 2/28/2017 | x |
| x | | 1184240 | 5/25/2016 | 6/1/2016 | 2/28/2017 | x |
| x | | 1188074 | 12/29/2016 | 12/26/2016 | 2/28/2017 | x |
| x | | 1184858 | 6/30/2016 | 6/26/2016 | 2/28/2017 | x |
| 90 | Customer | Custid | Start Date | Effective | Expiration | PC Name |
| x | | 1184993 | 7/3/2016 | 7/12/2016 | 4/30/2017 | x |
| x | | 1185584 | 8/15/2016 | 8/21/2016 | 4/30/2017 | x |
| x | | 1185431 | 8/5/2016 | 8/6/2016 | 4/30/2017 | x |
| x | | 1185657 | 8/17/2016 | 8/17/2016 | 4/30/2017 | x |
| x | | 1185561 | 8/12/2016 | 8/15/2016 | 3/31/2017 | x |
| x | | 1188046 | 12/27/2016 | 12/22/2016 | 3/31/2017 | x |
| x | | 1185714 | 6/22/2016 | 8/21/2016 | 3/31/2017 | x |
| x | | 1188476 | 10/7/2016 | 10/4/2016 | 3/31/2017 | x |
| x | | 1186427 | 1/23/2017 | 1/18/2017 | 3/31/2017 | x |
| x | | 1186578 | 2/1/2017 | 1/29/2017 | 4/10/2017 | x |
| x | | 1104389 | 7/8/2016 | 7/12/2016 | 4/30/2017 | x |

Consumer Direct utilizes our existing Customer Relations Management system to track and log contacts with members and associated workers. We will utilize this system to track and log member and DCSW complaints at all times. Reports may be generated out of our CRM upon the Bureau request in a the Bureau approved format.

We will track and record member satisfaction with our service delivery on an ongoing basis with the use of our annual member satisfaction survey. The survey is distributed annually by our Quality Improvement team across all of our 20 companies, and results are compiled by company and in the aggregate. Components of the survey specific to the Bureau self-directed programs can be added or changed per the Bureau specifications.

R3 Enrollment/Disenrollment | Monthly: Reports, by program, the members who have been fully enrolled or disenrolled from Personal Options.

| Carrier | Provider | Program | Location | Terminology | Admits | Admit Units | Discharges | Discharge Units |
|---------|----------|-------------|----------|-------------|--------|-------------|------------|-----------------|
| X | X | X | WDC | GEN | 1.00 | 0.00 | 0.00 | 0.00 |
| | | Total | | | 1.00 | | 0.00 | 0.00 |
| DHCF | DODHCF | FEA | WDC | GEN | 12.00 | 0.00 | 0.00 | 0.00 |
| | | Total | | | 12.00 | 0.00 | 0.00 | 0.00 |
| DHCF | DHCFCDMS | FEA | WDC | GEN | 11.00 | 0.00 | 0.00 | 0.00 |
| | | Total | | | 11.00 | 0.00 | 0.00 | 0.00 |
| | | Grand Total | | | 24.00 | 0.00 | 0.00 | 0.00 |

| Coordinator | Carrier ID | Program | Location | Region | Admit Units | Dischg Units | Admits | Dischg |
|-------------|------------|--------------|----------|--------|-------------|--------------|--------|--------|
| X | DHCF | FEA | WDC | GEN | 0 | 0 | 7 | 0 |
| X | DHCF | FEA | WDC | GEN | 0 | 0 | 4 | 0 |
| X | DHCF | FEA | WDC | GEN | 0 | 0 | 6 | 0 |
| X | | | WDC | GEN | 0 | 0 | 1 | 0 |
| X | DHCF | FEA | WDC | GEN | 0 | 0 | 6 | 0 |
| | | Grand Totals | | | 0 | 0 | 24 | 0 |

Details begin on the next page

R4 Financial Reports | Quarterly: Reports by employee, of payments made of FICA, FUTA/SUTA.

Our spending detail report allows the viewer see and analyze what payers and/or vendor clients are using by tracking how much is being spent per service date with relevant tax information.

Spending Detail: 1/1/2017 12:00:00 AM - 1/31/2017 12:00:00 AM

| Employee | Service Code | Service Date | Pay Period | Pay Date | Pay Units | Pay Rate | Pay Total | FICA 6.2% | FUTA 0.6% | MED 1.45% | SUTA 2.7% | WC 1.81% | Payroll Costs | ADMIN Fee | Total Spent |
|------------|--------------|--------------|------------------------|-----------|-----------|----------|-----------|-----------|-----------|-----------|-----------|----------|---------------|-----------|-------------|
| Sara Smith | T1019 X1 | 1/1/2017 | 12/25/2016 1/7/2017 | 1/20/2017 | 16 | \$13.85 | \$292.83 | \$18.16 | \$1.24 | \$4.24 | \$7.90 | \$5.30 | \$36.84 | \$0.00 | \$330.25 |
| Tom Smith | T1019 X1 | 1/2/2017 | 12/25/2016 1/7/2017 | 1/20/2017 | 16 | \$13.85 | \$292.83 | \$18.16 | \$1.24 | \$4.24 | \$7.90 | \$5.30 | \$36.84 | \$0.00 | \$330.25 |
| Van Smith | T1019 X1 | 1/3/2017 | 12/25/2016 1/7/2017 | 1/20/2017 | 16 | \$13.85 | \$292.83 | \$18.16 | \$1.24 | \$4.24 | \$7.90 | \$5.30 | \$36.84 | \$0.00 | \$330.25 |
| Will Smith | T1019 X1 | 1/4/2017 | 12/25/2016 1/7/2017 | 1/20/2017 | 16 | \$13.85 | \$292.83 | \$18.16 | \$1.24 | \$4.24 | \$7.90 | \$5.30 | \$36.84 | \$0.00 | \$330.25 |
| Won Smith | T1019 X1 | 1/5/2017 | 12/25/2016 1/7/2017 | 1/20/2017 | 16 | \$13.85 | \$292.83 | \$18.16 | \$1.24 | \$4.24 | \$7.90 | \$5.30 | \$36.84 | \$0.00 | \$330.25 |

R5 Claims Utilization | Monthly: Compares claims and expenditure information to Compare monthly self-directed service expenditures to the amounts allocated in members' budgets.

Spending against a member allotment can be monitored in real time through our portal 24 hours, 7 days a week. Collaborative discussion with the Bureau will allow us to develop detailed protocol regarding providing members and Resource Consultants with the most up to date spending and payroll information. For reference, see the spending report reflected above in R1 Member Monthly.

R6 Bank Account | Monthly: Provides summary of each Activity separate administrative bank account's monthly bank activity, reconciliation of the bank activity, reconciliation of the bank balance to General Ledger, and reconciliation of any amounts advanced from the Bureau.

We can customize our reports to meet all Bureau reporting needs including monthly reporting that summarizes separate administrative bank account's monthly bank activity, reconciliation of the bank activity, reconciliation of the bank balance to General Ledger, and reconciliation of any amounts advanced from the Bureau.

| Participation | FEA Data | | | | Reconciliation Data | | Discrepancy |
|---------------|--------------------|----------------------|----------------|-------------------|------------------------------|--------------------------|----------------|
| | Initial Submission | End-Time Adjustments | Total Payments | FEA Molina Report | COGNOS and Molina Difference | Medicaid Calc Difference | |
| | OS \$\$\$ | | | | | | |
| | \$11,138.00 | \$2,273.50 | \$ 13,411.50 | \$13,411.51 | \$ - | \$ (13,411.51) | \$ (13,411.50) |
| | \$1,791.19 | \$3,126.72 | \$ 4,917.91 | \$4,917.91 | \$ - | \$ (4,917.91) | \$ (4,917.91) |
| | \$3,665.11 | \$450.48 | \$ 4,115.59 | \$4,115.62 | \$ - | \$ (4,115.62) | \$ (4,115.59) |
| | \$4,019.14 | \$449.02 | \$ 4,468.16 | \$4,468.17 | \$ - | \$ (4,468.17) | \$ (4,468.16) |
| | \$7,784.33 | \$1,051.39 | \$ 8,835.72 | \$8,835.72 | \$ - | \$ (8,835.72) | \$ (8,835.72) |
| | \$2,124.73 | \$177.74 | \$ 2,302.47 | \$2,302.47 | \$ - | \$ (2,302.47) | \$ (2,302.47) |
| | \$2,024.97 | \$0.00 | \$ 2,024.97 | \$2,024.97 | \$ - | \$ (2,024.97) | \$ (2,024.97) |
| | \$11,060.90 | \$0.00 | \$ 11,060.90 | \$11,060.90 | \$ - | \$ (11,060.90) | \$ (11,060.90) |
| | \$15,528.73 | \$2,714.02 | \$ 18,242.75 | \$18,242.75 | \$ - | \$ (18,242.75) | \$ (18,242.75) |
| | \$10,986.38 | \$1,500.03 | \$ 12,486.41 | \$12,486.43 | \$ - | \$ (12,486.43) | \$ (12,486.41) |
| | \$6,739.30 | \$624.20 | \$ 7,363.50 | \$7,363.50 | \$ - | \$ (7,363.50) | \$ (7,363.50) |
| | \$5,204.91 | \$20.56 | \$ 5,225.47 | \$5,225.47 | \$ - | \$ (5,225.47) | \$ (5,225.47) |
| | \$12,790.92 | \$1,347.96 | \$ 14,138.88 | \$14,138.88 | \$ - | \$ (14,138.88) | \$ (14,138.88) |
| | \$2,317.76 | \$0.00 | \$ 2,317.76 | \$2,317.76 | \$ - | \$ (2,317.76) | \$ (2,317.76) |
| | \$3,620.71 | \$553.95 | \$ 4,174.66 | \$4,174.64 | \$ - | \$ (4,174.64) | \$ (4,174.66) |
| | \$3,557.78 | \$491.77 | \$ 4,049.55 | \$4,049.55 | \$ - | \$ (4,049.55) | \$ (4,049.55) |

R7 Bank Statement | Monthly: Copy of the monthly statement from the dedicated payroll bank account within fifteen (15) business days of the request, along with any other financial information requested by the Bureau to oversee the delivery of F/EA FMS and RC services.

As stated above, we can customize our reports to meet all Bureau reporting needs including submitting within fifteen (15) business days of request, monthly statements from the dedicated payroll bank account along with any other financial information requested by the Bureau to oversee the delivery of F/EA FMS and RC services.

5.18 The Vendor must agree to the Service Level Agreements (SLA) see Appendix 14.

Consumer Direct agrees to the Service Level Agreements (SLA) articulated in Appendix 14.



By signing below, I certify that I have reviewed this Request for Proposal in its entirety; understand the requirements, terms and conditions, and other information contained herein; that I am submitting this proposal for review and consideration; that I am authorized by the bidder to execute this bid or any documents related thereto on bidder's behalf; that I am authorized to bind the bidder in a contractual relationship; and that, to the best of my knowledge, the bidder has properly registered with any State agency that may require registration.

Consumer Direct Care Network West Virginia
(Company)

Ben Bledsoe, President and CEO
(Representative Name, Title)

A handwritten signature in blue ink, appearing to read "Ben Bledsoe", written over a horizontal line.

Cell: (406) 532-2001, fax: (406) 532-8573
(Contact Phone/Fax Number)

12/12/17
(Date)

Addendum Acknowledgement Form

SOLICITATION NUMBER: CRFP 0511 BMS1800000002

Addendum Number: 5

The purpose of this addendum is to modify the solicitation identified as CRFP BMS1800000002 ("Solicitation") to reflect the change(s) identified and described below.

Applicable Addendum Category:

- ☐ Modify bid opening date and time
- ☐ Modify specifications of product or service being sought
- ☒ Attachment of vendor questions and responses
- ☐ Attachment of pre-bid sign-in sheet
- ☐ Correction of error
- ☒ Other

Description of Modification to Solicitation:

1. Responses to vendor questions attached.
2. Revised language in Section 4.155 of the CRFP. See attached page for more information.
3. The bid opening remains on December 12, 2017 at 1:30 PM EST.

Additional Documentation: Documentation related to this Addendum (if any) has been included herewith as Attachment A and is specifically incorporated herein by reference.

Terms and Conditions:

1. All provisions of the Solicitation and other addenda not modified herein shall remain in full force and effect.
2. Vendor should acknowledge receipt of all addenda issued for this Solicitation by completing an Addendum Acknowledgment, a copy of which is included herewith. Failure to acknowledge addenda may result in bid disqualification. The addendum acknowledgement should be submitted with the bid to expedite document processing.



Appendix A: Personnel Resumes

Executive Team

Ben Bledsoe | President and Chief Executive Officer (CEO)



Ben developed his expertise in home and community-based services through education, experience, and hard work. After obtaining his bachelor's from the University of Virginia, Ben successfully completed two-years of Peace Corps service in Tonga, and went on to receive a master's in health administration. Starting out at Consumer Direct as a caregiver in 2004, Ben quickly applied his compassion for people and interest in business efficiencies to roles across the company including human resources and program management. Five years after being named CEO, Ben remains committed to ensuring all individuals have choice and control over the lives they lead.

Having worked his way up from an entry-level caregiver to president and CEO of Consumer Direct, Ben has a comprehensive understanding of service provision that is rare in today's healthcare industry. In 2006, Ben served as manager of Consumer Direct Care Network's program in Arizona, then returned to Consumer Direct's Missoula headquarters in 2009 to be vice president and eventually president and CEO. Ben's international, executive, and practical field experience has helped Consumer Direct thrive as today's self-direction services industry leader.

Current Position

President/CEO | Consumer Direct Management Solutions | 2012-Present

- Directs vision and goals for national family of home-based care companies
- Responsible for finances and operations of twenty (20) companies in fourteen (14) states with projected annual revenue in 2017 of more than \$268 million
- Maintains relationships with federal, state, and local government officials, appointees, and staff
- Collaborates with national and local managed care organizations on partnerships and new services
- Presents company initiatives and opportunities at large and small scale events
- Makes and approves policy, personnel, investment, and strategic decisions
- Supervises team of high-level executives
- Reports to owners and board of advisors

Employment History

Vice President | Consumer Direct Management Solutions | 2009-2012

- Managed quality assurance measures for twelve (12) affiliated companies
- Responsible for operations of nine (9) companies in multiple states



- Implemented internal review procedures and tools
- Developed fraud prevention program
- Tracked and trended complaints, compliments, incidents and system issues
- Supervised electronic documentation systems and reports
- Supervised risk management, human resources and program development departments
- Lead responses to requests for proposals (RFPs) and identified new business opportunities
- Chaired quality improvement committee
- Oversee special projects

Program Manager | Consumer Direct Personal Care | 2006-2009

- Developed self-directed models of personal care in Pima, Santa Cruz, and Maricopa Counties
- Initiated FMS services for several counties
- Communicated and collaborated with local and state program officials
- Assisted in securing contracts around the State
- Maintained operations and cohesion of Arizona offices including financial, procedural, regulatory (local, state, and federal), and human resources components
- Managed and supervised office supporting more than 350 employees
- Extensive knowledge of Medicaid's Personal Care programs

HR Associate | Nightingale Nursing and Caregiving | 2004-2006

- Trained in hands-on personal care of over 50 developmentally, physically, mentally, and emotionally disabled client.
- Conducted company orientation for all new employees
- Handled newspaper and online advertising of open job positions
- Audited timesheets for Medicaid payment
- Responsible for emergency, on-call tasks
- Safety committee member
- Skilled at general office equipment and computer use

Education

- M.S. Health Administration, Kennedy Western University | 2006
- B.A. Sociology, University of Virginia | 1999

Jeff Harriott | Chief Information Officer (CIO)



Jeff joined Consumer Direct in 2012 as IT director. He came to us with 30 years of IT consulting, service delivery, and management experience. Prior to joining us, Jeff was a senior manager at Microsoft's consulting services organization. In that role, Jeff led major technology initiatives for Microsoft's enterprise customers across the U.S. Jeff's experience also includes six years with KPMG Peat Marwick where he was a manager in the Government Services Practice that focused on planning, development, and implementation of Medicaid Management Information Systems (MMIS) for state Medicaid agencies. Jeff received his master's in business administration from Arizona State University and his bachelor's from the University of Montana. His professional certifications include Microsoft Certified Systems Engineer (MCSE), Certified Technology Specialist (MCTS), and Certified Professional (MCP). Jeff also holds a Project Management Professional (PMP) certification from the Project Management Institute.

Current Position

Consumer Direct Management Solutions | Chief Information Officer | November 2012-present

- Lead and manage information technology operations for the Consumer Direct family of companies.
- Scope of operations covers network infrastructure for data, video and voice, data center operations, custom application development, application support and maintenance, help desk support for over 500 employees.
- Strategic planning for technology services across the enterprise.

Employment History

Miller Creek Partners | Principal and CIO | April – November 2012

- Led and managed a start-up consulting group focused on services to design and implement cloud-based business management information solutions.
- Managed entire project lifecycle and customer experience for mid-market companies moving ERP, CRM, and e-commerce computing services to the cloud.

Microsoft Corporation | Principal Project Manager | September 2001 – April 2012

- Managed consulting services projects for Microsoft's largest customers in the western US, with a focus on large-scale e-commerce and messaging implementations.
- Responsible for \$4 million consulting revenue a year, management and development of technical resources, and the entire service delivery lifecycle for customer engagements.
- Led major projects for Costco, Target, Western Union, Russell Investments, Benefit Cosmetics, and Boeing Employees Credit Union.



IBM Corporation | Principal | August 1999-August 2001

- Directed operations for a 70-person consulting and development group focused on e-commerce and system integration using Microsoft technologies.
- Led recruiting and marketing efforts.
- Sold and led major development projects for Paccar, California Casualty Management Company, and Seattle FilmWorks.

Excell Data Corporation | Managing Consultant | December 1996-August 1999

- Responsible for account development, account management and service delivery in a strategic planning and infrastructure development practice for a regional Microsoft Solution Provider.
- Sold and led major Windows and Exchange projects for US WEST, AT&T Wireless, Frank Russell Company, and Boeing Employees Credit Union in a practice with 30 consultants and \$8 million per year revenue.

Swedish Medical Services | Chief Information Officer | April 1994-August 1995

- For a start-up administrative services organization, I directed implementation of a new data center, including all planning, design, product procurement, system testing, and implementation.
- Directed implementation of system services across fourteen remote sites.

Education

- M.B.A., Arizona State University, 1979
- B.S. in Business Administration, University of Montana, 1978

Daryl Holzer | Chief Financial Officer (CFO)



Daryl joined Consumer Direct in 2003 as a systems director and devoted himself to improving companywide accounting, payroll, accounts receivable, accounts payable, data entry, information technology and cash management processes. In 2013 he became the company's Chief Analytics Officer, then in 2016 was named Chief Financial Officer. Prior to joining Consumer Direct, Daryl worked as a controller of St. Patrick Hospital in Missoula for seven years, and as an accounting manager for Alexander & Alexander of Texas for five years. Daryl concurrently earned a bachelor's degree in business administration and a bachelor of science in computer science from the University of Montana. Daryl is certified as both a public accountant and a management accountant.

Current Position

Consumer Direct Management Solutions | 2003-present | Chief Financial Officer (formerly Chief Analytics Officer)

- Works to increase efficiency and develop and analyze future needs and business models for Consumer Direct.
- Serves as a companywide resource regarding program fiscal analysis and data support to show programmatic changes and trends. Daryl and his Analytics team serve as a foundational support system for the operations of Consumer Direct nationwide.
- Oversees the analytics team and provides any supporting data or analysis required to ensure programs continues to operate efficiently.

Employment History

Alexander & Alexander of Texas | Analytics | 1993-1998

- Analyzed client profitability and worked with account manager to determine rolling financial forecast.
- Designed a Forecast/Income Tracking System, reducing time required by each manager to project their rolling forecast.

Electronic Data Systems | Analytics | 1985-1993

- Improved Accounting Processes

Texas Oil & Gas | Accountant | 1983-1985

- Improved Accounting Processes

Education

- Bachelor of Science, Business Administration, University of Montana

Certifications

- Certified Public Accountant, State of Montana



Mickey Ogg | Chief Commercial Officer (CCO)



2017 marks Mickey Ogg's 10th year at Consumer Direct Care Network. He joined Consumer Direct shortly after obtaining his master's in business administration from the University of Montana. Mickey started out developing business plans and implementing document management systems as a special projects coordinator in 2007. As a result of Mickey's quick and thorough mastery of project implementation, he advanced to Quality Improvement Manager in 2009 and to Chief Commercial Officer in 2014. Since becoming CCO, Mickey has overseen implementation of our Colorado, Michigan, and Washington D.C. programs, has oversight of our compliance strategies, and has successfully directed us through our first companywide rebranding initiative.

Current Position

Chief Commercial Officer | Consumer Direct Management Solutions | 2014-present

- Oversees internal quality assurance reviews for over twenty (20) distinct state Medicaid, Medicare, and Private Pay funded programs.
- Manages the policy analysis, new business development, marketing, and community relations departments for all companies.
- Oversees new business opportunity coordination, RFP development, and implementation of new programs nationwide.

Employment History

Chief Compliance Officer | Consumer Direct Management Solutions | 2011-2014

- Managed the quality assurance team.
- Worked closely with all eleven state directors and program managers in annual audits and ongoing regulatory compliance review.
- Developed a comprehensive understanding of state regulations and program operations in multiple state environments.

Quality Improvement Manager | Consumer Direct Management Solutions | 2009-2011

- Guided internal reviews and compliance efforts across multiple state programs.
- Monitored existing policies, procedures, and state rules and regulations to ensure programmatic operations were compliant.

Special Projects Coordinator | Consumer Direct Management Solutions | 2007-2009

- Developed business plans and implemented a document management system.

Legal Researcher | Ogg Law Offices & McCann Law Firm | 2001-2007

Education

- Master of Business Administration, University of Montana, 2007
- Bachelor of Arts, History, University of Washington, 1999

Beth Peterson | Chief Operating Officer (COO)



Beth joined Consumer Direct in 2010 as a program manager, and has since managed the operational implementations of several new state programs along with ongoing supervision of operations in 14 states and across 20 service companies. She began her career working to improve the care of individuals with a developmental disability. She has more than 15 years' experience managing financial management and supports broker services. She is a certified trainer for person-centered planning. Her FMS experience includes management of service delivery, billing, accounts payable, and payroll. Beth received her bachelor's in psychology from College of St. Benedict and advanced studies from St. Catherine University.

Current Position

Consumer Direct Management Solutions | 2013-present | Chief Operating Officer

- Oversee program operations of companies providing services in 13 states
- Develop and implement policies and procedures
- Service development and implementation
- Customer Service & relations
- Training and development of person centered planning techniques and philosophies

Employment History

Consumer Direct Management Solutions | Regional Director

- Supervised program operations of companies providing services in four states
- Service development and implementation to diversify funding
- Develop and implement policies and procedures
- Customer Service & relations
- Training and development of person centered planning techniques and philosophies

Consumer Direct Management Solutions | Program Manager

- Lead reviewer for contract with Department of Human Services to recertify Fiscal Management Agencies for State of Minnesota
- Program lead on special projects related to Accounts Receivable, document management and maintenance as well as system efficiencies
- Customer Service & relations

Partners in Community Supports | 2005 - 2010 | Director of Services – Fiscal Management Agency

- Supervised all business operations of organization with annual revenue exceeding \$16 million.
- Provided service to over 600 families within six programs
- Developed and implemented policies and procedures for organization



- Provided training to all employees about service delivery, participant directed services and person-centered service

Dakota Communities Inc. | 1991-2005 | Support Services Supervisor-Developmental Disabilities

- Supervised services and employees providing participant care
- Service development and implementation
- Training and development of employees
- Managed budget and operations of over 20 different homes
- Provided Support Broker services to over 20 families using consumer directed services

Education

- Bachelor of Science, College of St. Benedict | 1987-1991
- Post-Baccalaureate Education, St. Catherine University | 1993-1994

Administration

Coco Ballew | Development Manager



Coco Ballew has been facilitating programs, projects and implementations across a range of non-profit and community-based agencies for 25 years. She will help ensure that the Consumer Direct team works seamlessly with LDH staff, and will support the Consumer Direct team to ensure that all deliverables are met timely and satisfactorily. Tasks she will assist with include hiring West Virginia staff. She will also bring her department's graphics, communications, writing, editing skills to the project to create a West Virginia-dedicated website and any communication or educational pieces needed to convey news or updates about the program transition to participants or DCSWs. Coco reports to Mickey Ogg, Chief Commercial Officer.

Current Position

Consumer Direct Care Network, Development Manager | 2013-present | Missoula, MT

- Identify and respond to new business opportunities by surveying current national market for self-directed in-home personal care
- Manage team for response to national request for proposals
- Provide implementation support for new programs until operational
- Collaborate with intra-office teams to expand the company's presence nationally

Employment History

Children's Museum Missoula: Putting Families First, Executive Director | 2008-2013

- Raised and managed annual budget for the Children's Museum Missoula and Parenting Programs
- Facilitated program development, staff management, corporate and individual solicitations, and grant writing
- Built capacity for expansion of staff and programming

El Paso Museum of Art, Public Relations Director | 2001-2004

- Promoted exhibitions and programs through media development, direct mail, public service announcements and web site management
- Co-managed development and museum programs staff
- Supervised museum volunteers

El Paso Times, Editor/Columnist | 1994-2001

- Community News Editor and staff features writer
- Wrote feature stories, covered arts and civic events and authored weekly column on topics of community interest



Education

- New Mexico State University, Bachelor of Arts, History | 1987
- American University, Washington DC, Museum Studies at Smithsonian American Art Museum, Publications and Curatorial offices | 1988
- University of Montana, School of Business Administration, Continuing Education | 2007-2008



Kelly Czarnik | Quality Improvement Director



Compliance and Efficiency Evaluation: Seven years of experience auditing Medicaid and Medicare based companies. Evaluate compliance in company requirements, files, and processes and recommend efficiency improvements based on accurate findings and data. Identify business improvement strategies. Troubleshoot workflows and processes.

Leadership and Communication: Prioritize and organize workloads to meet strict deadlines. Train, support and lead team members to successful outcomes. Establish and maintain strong working relationships with management, staff, and internal and external groups. Conduct large group trainings. Strong project management skills. Advanced knowledge of MS Office, Document Management software, and CRM software.

Current Position & History of Employment

Consumer Direct Management Solutions | September 2008 to Present | Quality Improvement Manager since September 2013

- Oversee the Quality Improvement department
- Conduct internal reviews
- Gather outcome data on company performance measures
- Develop company program rules
- Monitor State and Federal regulations
- Provide external review support
- Manage fraud prevention program and hotline
- Design and revise company forms
- Gather and analyze customer satisfaction data
- Maintain electronic records system
- Lead ongoing compliance training
- Oversee the Docuware Data Entry department
- Maintain document management software
- Review documents from 18 companies for completeness and accuracy
- Work with local offices to identify trends and recommend solutions

Education

- University of the Pacific, Stockton, California, B.S. in Business Administration | 2007

Kelly Jepson | Policy Analyst



Kelly Jepson oversees our policy analysis and government relations efforts across our family of companies. In this capacity, our government relations and policy teams work directly and closely with each of our program offices to alert us to regulatory changes that may require operational or policy changes to any of our programs. Kelly works to enable each of our state programs to take a proactive approach and engage in the public process for policy changes. Kelly holds a master's degree in public policy and public finance, and specializes in the research, analysis, and interpretation of regulatory changes at the federal, state, and local levels. Kelly reports to Chief Commercial Officer, Mickey Ogg.

Current Position

Policy Analyst-Government Relations for Consumer Direct Care Network

- Manages and supports Government Relations efforts, legislative outreach and research, and public policy analysis for CDCN's 20 companies across the United States.
- Conducts legislative and analytical research ongoing for regulatory changes to Medicaid, Medicare, private insurance markets, labor law, wage law, benefit coverage standard, and other types of regulatory frameworks for healthcare.
- Works with local program offices to establish connections with state lawmakers, state Medicaid agencies, providers, and trade associations to advance CDCN's interests and protect revenue streams.
- Works directly with the Executive team to engage in federal and state-level political strategy.
- Works to develop and advance CDCN as a nationally renowned Medicaid provider and as a consultant for development and implementation of Medicaid programs

Employment History

Contract & Benefit Specialist for the State of Colorado Department of Health Care Policy and Financing

- Managed and provided oversight of contracts for vendors providing self-directed care services for HCBS Medicaid waivers in Colorado.
- Researched, drafted, and implemented new state policy for HCBS Medicaid services.
- Worked directly with members of the public, stakeholders, external vendors, and internal HCPF staff to operationalize and implement policy changes in self-directed care.
- Led the development, negotiation, and implementation of Requests For Proposals and Contracts for external vendors for HCPF.
- Developed and maintained collaborative relationships with vendors and stakeholders to ensure contract and policy oversight, and to enable effective delivery of self-directed services to HCBS Medicaid clients in Colorado.
- Managed highly technical billing and service authorization issues for HCPF, and facilitates issue resolution.



*Policy Support Specialist at the Colorado Department of Health Care, Policy and Financing
City Council Aide at Denver City Council District 10*

- Worked directly with mayoral staff, council members, and legislative analysts on policy research, events planning, and constituent services.
- Directed constituents to a variety of services around the city, and engaged community members with civic events around the District.
- Facilitated and oversaw forums for Council policy negotiation and change, and assisted the Councilwoman in navigating through day-to-day activities to ensure timeliness, efficiency, and ability to meet a wide array of the needs of the District.

Consultant for Housing Colorado, April 2013-14, Graduate Thesis

- Worked directly with the Executive Director to conduct field work, research and publish best practices for rural affordable housing provision in Colorado.

Scientific Cultural Facilities District in Denver, CO, January 2012-14

- Worked directly in the review of grant applications for over 300 organizations within the Denver metro area.
- Engaged in the analysis and approval of applications for SCFD dollars.
- Ensured the timely allocation of funding and tracked organizations' use of funds.

Office of Emergency Management and Homeland Security for the City and County of Denver, 2012-July 2012

- Worked directly with OEMHS staff in the organization and implementation of the Whole Community concept to catalogue and organize all non-profits, faith-based organizations, homeless shelters, and local businesses in the City of Denver.
- Worked to mobilize and leverage existing assets in the City of Denver in the event of an emergency.

Education

- B.A. in Sociology, University of Colorado at Boulder | 2008
- M.S. Public Administration, with Distinction, University of Colorado at Denver, Graduate program in the School of Public Affairs | 2013



Kathleen D. O'Conner | Operations Director



Kathy has helped Consumer Direct conduct business in a responsible manner for thirteen years. With the support of our Analytics and Quality Improvement departments, Kathy monitors for dangers that could obstruct the company and its employees from providing the highest quality services to participants. She has developed programs, like our Compliance Hotline and Safety Committee, to proactively make the workplace safer. Kathy reports directly to Daryl Holzer, Chief Financial Officer.

Current Position

Risk Manager, Consumer Direct Care Network, MT

- Develop, enhance and oversee the company-wide risk management program.
- Identify, analyze and control risks, minimize losses, improve safety, and maximize opportunities for the company and its employees.

Employment History

Collections III, Administrator, First Security Bank, Missoula, Montana, September 2003-June 2004

- Monitored files and processed documents relating to customer bankruptcies and foreclosures
- Audited the Bankruptcy Course at the University of Montana School of Law
- Filed documents with Bankruptcy Trustees and attorneys, and appeared at hearings in Bankruptcy Court
- Monitored Foreclosure proceedings involving Bank customers and worked with Bank's legal counsel and loan officers to ensure recovery of property

Client Manager, Litigation Abstract, Inc., Missoula, Montana, June 2000-October 2001

- Initiated client contact, wrote proposals and responded to service calls.
- Communicated project guidelines, specifications and changes to production and technical staff.
- Worked with staff to resolve client issues. Coordinated project and staffing needs.
- Coordinated advertising & company participation in marketing events. Attended trade shows & conventions.

Corporate Technical Writer, Sterling Savings Bank, Spokane, Washington, June 1991-May 2000

- Developed the Bank's Corporate Policy Manual. This involved writing, editing and maintaining corporate policies in a format that complied with regulatory requirements and provided understandable information to the Bank's officers and managers.
- Additionally, acted as the control point for all manuals, handbooks, etc. to ensure the Bank's policies & procedures were kept current and communicated to the necessary departments.



- Reviewed department contracts, looking closely at contract terms, conditions, and related documentation to determine if any action was required to bring contracting parties into compliance.
- Communicated problems or concerns to appropriate officers, and assisted in resolving any outstanding issues.

Shareholder Relations, Sterling Savings Corporation, Spokane, Washington

- Maintained beneficial ownership records; prepared applicable SEC, OTS, and NASDAQ reports and monitored officers' & directors' compliance with appropriate regulations.
- Processed all stock option grants, exercises and reporting.
- Assisted with writing of Proxy Statement and oversaw voting process to ensure accuracy and timeliness of information.

Education

- University of Montana School of Law, Juris Doctorate, Missoula | 1990
- University of Montana, Bachelor of Science in Business Administration (Management) | 1987



Steve Richards | Human Resource Director



An innovative and energetic leader with excellent management and communication skills offering 40 years of progressive, professional experience in public and private companies from \$50 million to \$5 billion. Steve is certified as a contract administrator/arbitration chief spokesman, and has 40 years' experience working with a variety of workers and administrative staff on their individualized human resources needs. Steve plays an integral role in the startup of all our new companies and programs, and in accommodating administrative staffing needs. Steve and his team work diligently behind the scenes to ensure his team can offer support with detailed F/EA, payroll, timesheet, participant, or worker issues as they arise.

Current Position

Consumer Direct Care Network | 2000 to Current

- Staff office startups since 2000

Employment History

Firestone – Henderson, Ky

- Staffed newly constructed manufacturing plant
- Staff and Production employees on time and within budget

SONOCO – North Ridgeville, Indiana

- Staffed newly constructed manufacturing plan
- With 148 Staff and Production employees on time and within budget.
- Managed 40 plant College Recruiting Program
- Recruited Corporate, Division, Plant Executives, Managers and Professionals

Education

- BS Communications Kent State University
- Post-Baccalaureate HR Courses Akron University
- MS Human Resources American University (in-progress)



Steve Rosenbaum | Claims Director



Steve Rosenbaum came to Consumer Direct with years of experience working in business management and billing. Steve holds under his belt two years' experience overseeing Consumer Direct's entire billing department, including our 20 companies and 90 different payer sources. Steve oversees all of Consumer Direct's claim submission activity and all payer sources, and he has worked hard to develop an intimate understanding of multiple claims systems and the programs that we offer, including the various types of F/EA services.

Current Position

Consumer Direct Care Network | Missoula, MT | Billing Manager | 2/14 – Current

- Steve manages a team of 25-30 people responsible for all Accounts Receivable and Billing functions. He's responsible for the billing activities of all 20 companies across 14 states, and for processing payment of more than 100 different paying entities.

Employment History

Rosenbaum Remodeling | Missoula, MT | Owner | 2007-2014

- Working with local customers on residential remodeling work. Creating updated and new kitchens, bathrooms, basements, cabinetry, tile and working with sub-contractors to provide a total solution.

Inland Northwest Space Alliance | Missoula, MT | Director of Technology | 2005-2007

- Responsible for all aspects of technology throughout the company.
- Managed technical partnership for remote sensing demonstration focused on emergency medicine (LifeGuard), which resulted in a biomedical startup company attempting to take the resulting product to market.
- Lead project to build and deploy a communications trailer allowing remote schools to communicate with scientists at NASA using a multi-media video conferencing system.
- IT infrastructure and biometric badge based security system management.

Microsoft | Fargo, ND | Sr. Program Manager / Principal Consultant/ Resource Manager | 2004-2005

- Responsible for business analysis and design for IT systems specific to Microsoft.
- Lead analyst working with internal business leaders and external customers to design system additions/changes to increase user experience and effectiveness.
- Responsible for pipeline tracking and lead follow-up, sales quota and individual utilization.
- Technical pre-sales, project management, staffing and mentoring for individual team members within the central region for Microsoft Business Solutions Consulting.

Great Plains Software | Fargo, ND | Team Leader / Senior Consultant / Support | 1992-2001

- Customer facing roles in both Consulting and Technical support, helping to troubleshoot and determine requirements for successful customer system implementation.



- Responsibilities included estimation and creation of custom components, individual participant and leader for custom programming solutions to complete the customer implementation.

Education

- Concordia College, Computer Science and Business Administration, Moorhead, MN | 1991



Brent Selle | Enhanced Customer Service Department Supervisor



Brent has worked hard over the course of the past two years to ensure our customer service remains timely, direct, and supportive of participants and workers as our programs continue to expand in various states. Brent and his team have worked to develop a queue system for calls, which has enabled staff to expedite the issue resolution process. Brent works directly with program staff to develop program-specific training materials for call center staff, as well as helps provide ongoing trainings to staff regarding the nature of interactions with participants and workers, as well as the particular challenges and success of each program, in order to prepare customer service representatives in a comprehensive manner prior to coming into direct phone contact with callers.

Current Position

Customer Service Center Manager, Consumer Direct Care Network

- Establish a working customer service center handling call volume of up to 3000 calls monthly
- Develop queue system for the call center, including an auto attendant and call routing
- Hire and train all staff for the call center
- Develop all scripting and policy for the call center
- Establish a system for fax verification for outlying offices

Employment History

Customer Care Team Leader, DirecTV Call Center, 2006-2014

- Manage agent schedules and monitor Queues for best time to consult with an agent as to not interfere with a Queue
- Participate in special projects that take advantage of my communication skills – using email to communicate high level roll up of events
- Manage and monitor agent attendance
- Complete outbound calling to customers in order to help assist them

Customer Service Representative

- Help customers solve technical problems that may occur with their DirecTV systems
- Order equipment for customers
- Schedule Service calls
- Work within a team to achieve personal and company goals

AHT Best Practices Supervisor

- Focus on company driven goals involving key performance indicators
- Help agents achieve where they are having difficulty
- Work to make a site-wide impact on call center goals

Technical OJT Account Supervisor

- Build original format for teaching and training technical calls



- Aid center trainers to support various call teams
- Help agents with new call types and help them become successful at learning new skills

Education

University of Montana, English



Wendy Stuker | Controller



As a CPA with ten years' experience in accounting field, Wendy Stuker has worked her way up through Consumer Direct and now serves as the Controller. In this role, Wendy oversees financial statement preparation and ensures accurate and timely billing practices. Wendy has been working to understand and oversee the effective management of billing in our F/EA models since 2011. Wendy continues to work closely with this model to ensure all payments are remitted in a timely manner and that payroll operations function smoothly. Wendy works as the lead Controller for Consumer Direct and has been with our company since 2011, beginning with us as an Accountant Analyst. Wendy works closely with all of our state programs as an auditor of financials, and will work closely with the program staff in Hawai'i in the interest of continuing on-time and accurate invoicing, claims submission, and processing of payment.

Current Position

Consumer Direct Management Solutions | Controller | 2011-present

- Oversee financial statement preparation and combining statements of multiple companies
- Review work papers, financial statement notes and program analysis and statistics for accuracy and consistency
- Prepare for annual audit and provide lead contact support for auditors
- Oversee and review quarterly and annual report filing requirements including tax reports
- Meet with executives, owners and program managers on a monthly and quarterly basis to review financials
- Implement and manage systems and procedures to consistently meet reporting requirements and deadlines
- Create, train and manage training documents and accounting policy
- Create, develop and troubleshoot financial reports and combining statements in Management Reporter
- Oversee and review monthly and year end close process, including accurate intercompany billing
- Oversee new company setup in accounting related software
- Review accounts payable for payment, review payroll and accounts receivable for variances

Employment History

Resorts West, LLC | Controller | 2007-2011

- Controller 2009-2011, Associate Controller 2008-2009, Senior Staff Accountant 2007-2008
- Create cost analysis and company structure to streamline operations controlling operational expenses
- Increased accuracy in billing policy and in turn revenue generation by 5,000% over a two year period



- Implement and manage systems and procedures to decrease month end close process by 5-10 days
- Create and manage training documents, accounting policy and software training companywide
- Research and implement DocuSign software and billing tracking software to increase efficiency
- Prepare year end financials for tax return and monthly financial reporting for executives and owner review
- Prepare and integrate department budgets and companywide budgets for multiple entities
- Prepare monthly profit and loss budget versus actual performance analysis for managers and owner review
- Manage and analyze purchase orders, cash flow, intercompany transactions and rate analysis
- Approve accounts payable, including company allocations, and manage collections of accounts receivable
- Create and manage fixed assets and supply tracking systems to cut costs by 30% year over year
- Develop and manage PCI credit card compliance regulations and companywide policy
- Reconcile general ledger accounts and prepare monthly general journal entries
- Prepare and issue year end 1099s

Staff Accountant for Tompkins & Peters CPAs, P.C. 2006-2007

- Conducted audit preparation and work papers for multiple audits
- Head of the Construction Contractors Compilation department and met with prospective clients
- Create WIP schedules related to construction financial statements
- Communicated and was responsible for working with several top clients
- Prepared monthly bookkeeping, quarterly payroll reports, year-end reports and forms: W-2s and 1099s
- Prepared compilations, reviews, audits, business valuations and other management advisory services
- Prepared tax returns for individuals, corporations, S-corporations, partnerships and exempt organizations
- Prepared tax research, planning and IRS support

Certification

- 2007-Present CPA in Montana

Education

- University of Montana, Missoula, MT, Master's in Business Administration, 2006
- Bachelor of Science, Business (Accounting and Management), 2004
- Student athlete in University of Montana soccer program

Katie Trotter | Payroll Manager



Katie Trotter has more than 20 years in the field of financial management and payroll. She spent the last three years working with Consumer Direct's F/EA department and new F/EA participant profiles, which is one of the many reasons she knows how to build upon successful F/EA processes to continue to create more efficient methods of payroll processing and tax filing. Katie came to Consumer Direct from a health clinic, which complements her business experience and will continue to add value as Consumer Direct enrolls workers into our payroll system.

Current Position

Consumer Direct Management Solutions, Payroll Manager, January 2014-present

- Oversees the Consumer Direct payroll team, which processes payroll for around 22,000 caregivers and administrative employees nationwide every two weeks and on a supplemental basis when necessary
- Works with state program managers in eleven states to ensure a companywide understanding of payroll processes
- Works closely with the executive team to implement procedural changes resulting from programmatic changes or state and federal policy
- Manages day to day operations, procedural analysis, and efficiency of operations to ensure payroll is processed in the most efficient manner possible

Employment History

Civil Engineering, Office Manager, August 2012-January 2014

- Managed office operations and supervised administrative staff
- Assisted in financial statement preparation and analytics
- Worked as the director of facilities
- Worked as the fleet manager
- Honed project management skills on a regular basis

HS Clinic, Staff Accountant, March 2013-January 2014, Independent Contractor, January 2014-May 2015

- Completed full financial statement reporting
- Oversaw payroll and taxes for the clinic
- Completed look back audits of financial records

Construction Industry, Controller, Contract Administrator, May 1992-January 2012

- Financial statement reporting using GAAP standards, including balance sheets, income statements, cash flow statements, general ledger, accounts payable, accounts receivable, and inventory cost and controls
- Completed reporting for multistate payroll
- Contract administration, management and negotiation, as well as cost analysis for government and private contracts



- Negotiated and implemented union contracts annually; worked closely with local union offices on compliance regarding dues, benefits and pay
- Quarterly and annual tax reporting
- Managed ban and loan portfolios, insurance, and bonding
- Human resource management
- Utilized accounting programs
- Corporate Officer
- EEO Officer
- Managed and supervised employees

Education

- Bachelor of Science, Business Administration and Management, University of Montana, 1992

Certifications

- Missoula Area Health and Safety Committee, 2 years
- Continuing Education in:
 - Human Resources & Business Law
 - Financial Reporting
 - Bonding and Banking

Kari Vinopal | Operations Director



Kari has worked with Consumer Direct for more than eight years and was essential to the development of services in Wisconsin where Consumer Direct provides Agency with Choice and FMS, services in Colorado where Consumer Direct provides training services, and services in the District of Columbia, providing support broker and FEA services. Kari has a bachelor of science in social work and is a licensed social worker (LSW) in Minnesota. She has worked as a social provider in child protection and with individuals with intellectual disabilities. While in these roles, she developed individualized care plans and provided oversight and monitoring of the plans to ensure the needs of individuals and families were met.

Education

- Bachelor of Social Work, University of Minnesota at Mankato

Current Position

Consumer Direct Management Solutions | Operations Director | 2014-present

- Supervises day to day operations for three companies in three states
- Supervises the regulatory environments in Colorado, Wisconsin, and the District of Columbia including state agency directed changes to the FEA and Co-Employment self-directed programs in both states
- Oversees the development of FEA and Co-Employment training materials and regulatory changes for self-directed services in Colorado and Wisconsin, where services are offered statewide
- Responsible for oversight of the implementation of programmatic changes across program operations in Colorado and Wisconsin
- Works closely with state staff to collaboratively develop necessary programmatic adjustments to national and state changes to self-directed services
- Utilizes social work background to perform outreach to clients and face to face enrollments into both FEA and Co-Employment programs
- Maintains good working relationships with state staff, other FMS providers throughout the implementation of challenging new requirements in self-direction.

Employment History

Program Manager, Consumer Direct Wisconsin

- Worked to develop relationships with state staff and grow newly contracted self-directed programs from the ground up
- Completed face to face enrollments with new consumers



- Trained local Consumer Direct staff on enrollment, program policy and procedure, and providing excellent customer service
- Grew CDWI program one client at a time through in-person contact and continued attention to detail regarding response to consumer concerns, staffing needs, programmatic changes, and the ever growing complexity of the self-directed environment

Mains'1 Services, Inc | Director, Consumer Directed Supports | 2007- 2008

- Facilitated inter-department relationships in order to deliver timely customer service
- Implemented all program and organizational requirements
- Marketing team member charged with the develop and implement of agency marketing strategies
- Hired, supervised and evaluated management staff

Cooperating Community Programs | CDCS (Consumer Directed Consumer Supports) Administrator | 2002- 2007

- Directed, wrote and successfully passed the State of Minnesota Fiscal Management Readiness Review and Recertification Review
- Human Resource Management for 400 employees, including personnel file maintenance, unemployment, worker's comp, orientation, discipline, policy & procedure implementation
- Developed, administer and analyzed \$4.5 Million annual budget
- Oversight of payroll and billing administration
- Hired and supervised management staff
- Certified Flexible Case Manager

Cooperating Community Programs | Executive Director, Community Service | 2001-2002

- Built new service options for families with children with disabilities
- Rejuvenated and strengthen existing service options to generate revenue
- Created and administrated company marketing strategies
- Communicate and network with County and State of Minnesota personnel
- Provided program oversight in accordance to Minnesota licensing standards
- Supervised, hired and evaluated 20 Management Staff and 425 employees
- Developed company policies and procedures

Special Olympics Minnesota | Sports Program Manager | 2000-2001

- Managed and coordinated program operations of Northern Minnesota
- Recruited and trained of volunteers
- Supervised 3,000 volunteers, 2000 athletes and 100 Special Olympics Teams
- Organized and administered 30 Special Olympics sporting events at regional level
- Assisted Area and Local Sports Management Teams in budget development
- Educated volunteers on appropriate marketing and fundraising strategies
- Developed and maintained partnerships with local businesses, organizations and media outlets
- Mentored Area and Local Sport Management Teams to implement and manage the policies and procedures of Special Olympics Minnesota



- Evaluated sports management systems

LEEP (Leisure Education for Exceptional People) | Executive Director | 1995-2000

- Created, planned, implemented and evaluated recreational programs for 650 individuals with disabilities
- Networked with Board of Directors to meet agency goals and objectives
- Organized and hosted major community events
- Utilized local media to promote agency activities and increase community awareness
- Developed fundraising campaigns and grant opportunities
- Hired, trained and supervised full-time and part-time staff
- Recruited, trained and supervised 250 community volunteers annually
- Created marketing strategies such as community presentations, publications, web site development

Certifications

- Licensed Clinical Social Worker, Board of Social Work for the State of Minnesota



Appendix B: Base Policies and Procedures Manual For F/EA FMS and Resource Consulting



**Base Support Broker & FEA-FMS
Policy and Procedure Manual**

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Purpose: Base policies and procedures serve as the foundation to create policies and procedures for a new Support Broker FMS program. Base policies and procedures are not inclusive of what each program may require and therefore individualized policies may need to be written to meet scope of work.

To use:

1. Review program requirements
2. Adjust appropriate policy to include program specific requirements in highlighted sections
3. If new policy is required consult with the State Director, Senior Director and/or Quality Improvement Director



GENERAL INFORMATION

This section includes a variety of information about Consumer Direct's office and operational systems.

Consumer Direct Office Location

<Insert Address>

Office Hours of Operation

8 AM to 5 PM - Monday through Friday, excluding identified holidays

Telephone and Email Communication

Good communication is essential to providing timely and quality service. Consumer Direct offers IRIS participants access to a toll free telephone number as well as a general email address for inquiries during typical and non-business hours.

- Toll free phone – <Insert Number>
- Toll free fax – <Insert Number>
- General email: <Insert State Specific Email>
- Website: <Insert State Specific Website>

Voice messages left in the general voicemail or for a specific staff are monitored throughout each business day and returned within one business day.

All email inquiries are responded to within one business day.

Computer Systems

The use of computers by Consumer Direct operational and field staff is a requirement. All staff are trained on privacy practices and are expected to ensure the confidentiality of their passwords for the network. Likewise, all of the information on the system (e.g. files and forms) is proprietary and confidential.

All employees log off when they leave their workstation and at the end of the day.

Policy and Procedure Manual

POLICY: Consumer Direct will update and maintain a state or program specific policy and procedure manual.

PROCEDURE:

1. The manual will contain both Support Broker division and VF/EA FMS division policy and procedures.
2. As needed, but minimally once per year, the manual will be reviewed by each department for updates or changes.

INTERNAL CONTROL: The Program Manager, Operations Director, and Quality Improvement Director will review and maintain electronic and paper versions of the manual.

Communication with Participants, Employees and Stakeholders

POLICY: Consumer Direct will provide a customer service system to respond to all inquiries from Participants, employees, case managers, agencies, and vendors.

PROCEDURE:

1. Upon hire, the Program Manager or Director will provide new staff with training regarding customer service, with an emphasis on self-direction. The Program Manager provides the new employee with Consumer Direct's training modules related to Customer Service and Self-Direction. This information is reviewed with the new employee, and the employee completes the quizzes related to customer service and self-direction that are included at the end of the training modules.
2. Individuals can contact Consumer Direct via phone, email, or make an appointment to meet in person.
3. Consumer Direct has established and maintains a toll free customer service line to ensure that Consumer Direct personnel are available during regular business hours, 8:00 AM to 5:00 PM, <insert state specific time zone>, Monday through Friday, excluding weekends or published holidays. Individuals are able to leave voice mail after hours on a 24/7 basis. Toll Free:<insert number>
4. Consumer Direct also maintains a toll-free fax line of <insert number>
5. Provide prompt and consistent response to verbal and written communication.
 - a. All voice mail messages responded to within one (1) business day.
 - b. All Consumer Direct staff have a company email address. Email is viewed as a written form of communication and is responded to within business (1) business day.

- c. Staff are trained in the company's email procedures at hire and are expected to adhere to the email etiquette guidelines
 - d. All personnel will make arrangements for phone calls and e-mail messages to be handled by another staff person in their absence. Planned absences should be noted on the staff member's voicemail.
6. The local office is open during the business hours listed above and is staffed unless all staff members are out to complete enrollments, attend meetings, or accomplish other necessary activities. In the event this is necessary, a return time is indicated on the office door.
7. Consumer Direct will ensure that translation and interpreter services are available to participants utilizing internal resources.
8. Consumer Direct provides materials and information online at: <Insert State Specific Website>

INTERNAL CONTROL: The Program Manager is responsible for ensuring the Consumer Direct staff are available during business hours. Director ensures toll free line is staffed 8:00 AM to 5:00 PM, <insert state specific time zone>, Monday through Friday, excluding weekends or published holidays. Director reviews written documentation and phone reports to monitor schedules on a random basis.

Referral and Initial Contact

POLICY: To respond to all referrals for services within <insert timeframe based on contract requirements> following the receipt of the referral.

PROCEDURE:

1. Upon receipt of a referral Consumer Direct will:
 - a. Enter the Participant's demographic information into CRM
 - b. Assign Participant to a Consumer Direct Support Broker
 - c. Task the Support Broker for follow-up
 - d. Create temporary paper file for referral documents
2. The Support Broker will contact the Participant. This initial contact generally involves:
 - a. Introduction to Consumer Direct
 - b. General overview of program and requirements for starting services
 - c. Answer questions
 - d. Schedule home visit
3. Document contact and visit date/time in CRM

INTERNAL CONTROL: The Program Manager will monitor tasks in the CRM.

Note: Update with additional program specific requirements.

Enrollment, Orientation and Training

POLICY: Consumer Direct will assist with completion of enrollment forms.

PROCEDURE:

1. Consumer Direct conducts in-person meetings with each Participant.
2. The following topics are completed at the in-person meeting(s):
 - a. Consumer Direct contact information
 - b. Program overview
 - c. Review of handbooks, roles and responsibilities
 - d. Review of program and Consumer Direct policies and procedures
 - e. Review Fraud Prevention, including viewing fraud video
 - f. Review, sign, and date the Participant Enrollment Packet
 - g. Review employee enrollment packet and complete if employee is present
 - h. Review goods and services vendor packet and process, when applicable
 - i. Review payroll information including payroll schedule, web portal submission or paper timesheets if necessary
 - j. Complete budget
3. When possible, the Participant, Employee and Vendor packets are prepared ahead of time and contain the following:

Participant Enrollment Packet

- a. Packet overview, organization, and an explanation forms
- b. Welcome and New Participant Checklist
- c. Participant Data Form
- d. Consumer Direct Participant Agreement and Acknowledgement
- e. <Insert program specific forms>
- f. IRS Form SS-4: Application for Employer Identification Number (EIN)
- g. IRS Form 2678: Employer/Payer Appointment of Agent – Authorizes Consumer Direct to withhold taxes from employee checks and deposit those taxes with the IRS
- h. <Insert state specific forms necessary to establish an employer>
- i. IRS Form 8821 Tax Information Authorization (if applicable)

Note: Instructions on how to complete IRS and state specific employer forms are available.

Note: Copies of completed forms will be provided upon request.

Employee Enrollment Packet

- a. Provide packet overview and an explanation of forms
- b. New Employee Checklist
- c. Employee Data Form – Demographics sheet
- d. I-9 Employment Eligibility Form
- e. W-4 Employee Withholding Allowance Certificate
- f. <Insert state specific Withholding Allowance Certificate or non-resident form, if applicable>
- g. Pay Selection Form – Selection of Direct Deposit
- h. Employment Relationship Disclosure for Publication 15 exemption
- i. Live-in, 2014-7, Companionship exemption forms, if applicable
- j. Caregiver Employment Agreement
- k. Background Check and/or Fingerprint related forms
- l. <Insert other program specific forms>
- m. <Insert required training, if applicable>

Individual Goods and Service Vendor Packet

- a. Packet overview and explanation forms
 - b. Agreement
 - c. <Insert other program specific forms>
 - d. W-9: Request for Taxpayer Identification Number and Certification
 - e. IRS Form SS-8 Guidance Regarding the Employee vs. Independent Contractor Designation, if applicable
 - f. Process for submitting invoices
4. Budget/Plan Development (when applicable)
- a. Consumer Direct will assist the participant in developing their self-directed budget
 - b. <insert program specific steps and requirements>
5. Issue Okay to Work letters are sent to the Participant and employee indicating the start date.

INTERNAL CONTROL:

Completed enrollment packets in Docuware and proficiency tracker reports.

Administrative staff and Employee Background Check and Fingerprint Clearance

<insert policy, procedure and internal control for state background check and fingerprint clearance (if applicable) process including specific forms, websites and other requirements>

POLICY:

PROCEDURE:

INTERNAL CONTROL:

Monitoring Service Delivery

POLICY: Consumer Direct will contact Participants at intervals as identified in contract scope of work.

PROCEDURE:

1. Consumer Direct Support Broker staff will conduct <insert frequency per program requirements>. The contact may include:
 - a. Satisfaction with their services
 - b. Employer concerns/questions
 - c. Review spending summaries and address any spending/budget issues
 - d. Budget plan changes if desired or necessary
 - e. Retraining
 - f. Health and safety (i.e. hospital visits, etc.)
 - i. Emergency Back-up plan effectiveness and changes
2. If identified in the scope of work, Consumer Direct will assist with budget changes
 - a. <insert program specific requirements>
3. Consumer Direct will report any concerns regarding the Participant's ability to successfully self-direct their services to <insert program specific requirements>
4. Consumer Direct staff will immediately report any health and safety concerns to <insert program specific requirements> regarding:
 - a. Allegations of abuse, neglect, and/or exploitation
 - b. Health, safety, and welfare of self or to others
 - c. Non-delivery or extended breaks in service
 - d. Noncompliance with employer responsibilities
5. All calls and visits, action steps, and resolution will be documented in CRM.

INTERNAL CONTROL: Monitoring of CRM documentation, monthly and quarterly contact documentation forms.

Mandatory Reporting

POLICY: Consumer Direct will adhere to all requirements for reporting abuse, neglect, exploitation, or fraud.

PROCEDURE:

1. All Consumer Direct staff will be trained on the mandatory reporting requirements.
2. Any concerns will be discussed with the Program Manager or Director and then reported to <insert applicable reporting unit(s) and contact information>.
3. All documentation and actions taken regarding the situation and report will be placed in CRM.

INTERNAL CONTROL: Documentation in CRM.

COMPLAINT REPORTING AND MANAGEMENT

POLICY: In all entities in the Consumer Direct Care Network: Consumer Direct will identify, document, and resolve all applicable complaints regarding Consumer Direct services, systems, procedures, or administrative decisions.

PROCEDURE:

1. When staff receives feedback from consumers, caregivers, state agencies, contractors, case managers, etc., staff will determine if the feedback meets Consumer Direct's definition of a complaint.
 - a. A complaint, for the purposes of this internal policy, must meet at least one of the following criteria.
 - 1) The issue is something within Consumer Direct's reasonable control. (e.g.: enrollment procedures, handling of payment issues, web portal concerns, etc.) AND the issue needed to be escalated from a Program Coordinator to a Regional Coordinator, Supervisor, or Program Manager/Director for resolution.
 - a. Examples of issues that are not in Consumer Direct's reasonable control are customer service hours, budget
 - b. amounts, delayed pay due to incorrect information or weather, etc. These would not be considered a complaint.
 - 2) The person giving the feedback explicitly states, "I want to file a complaint."
 - 3) The person completes and submits a Complaint Form, Feedback Form, or any other company documentation meant for such purposes.
2. If the feedback meets the definition of a complaint, then the Program Coordinator will log the complaint using Consumer Direct's Customer Relationship Management (CRM) software. The Program Manager will be advised that a complaint was received.

3. The Program Coordinator will work toward a resolution of the issued complaint. If the Program Coordinator is not successful in resolving the complaint, the complaint will escalate to the next supervisory level until it can be resolved. Steps taken toward resolution will also be logged in the CRM to track ongoing progress and new developments.
 - a. If the complaint is against an administrative person, the complaint will be automatically escalated to the Program Manager for resolution.
4. The Program Manager will forward the resolved complaint to the Quality Improvement Manager for review and analysis.

INTERNAL CONTROL: Program Managers will routinely monitor that complaints are documented and appropriately resolved. The Quality Improvement Department will review complaint data during internal reviews.

Grievance Reporting and Management

POLICY: In all entities in the Consumer Direct Care Network: Consumer Direct will maintain a system to identify, document, and resolve all applicable grievances regarding Consumer Direct services, systems, procedures, or administrative decisions.

PROCEDURE:

1. When staff receives feedback from consumers, caregivers, state agencies, contractors, case managers, etc., staff will determine if the feedback meets Consumer Direct's definition of a grievance.
 - a. A grievance, for the purposes of this internal policy, meets one or more of the following criteria.
 - 1) The issue is a more formalized version of a complaint.
 - 2) The issue is related to organization policy and procedure.
 - 3) The issue is a perceived violation of consumer rights.
 - b. A grievance must be in writing and submitted to a Program Coordinator.
2. If the feedback meets the definition of a grievance, then the Program Coordinator will log the grievance using Consumer Direct's Customer Relationship Management (CRM) software. The Program Manager will be advised that a grievance was received.
3. The Program Coordinator will work toward a resolution of the filed grievance. If the Program Coordinator is not successful in resolving the grievance, the grievance will escalate to the next supervisory level until it can be resolved. Steps taken toward resolution will also be logged in the CRM to track ongoing progress and new developments.
 - a. If the grievance is against an administrative person, the grievance will be automatically escalated to the Program Manager for resolution
4. If the grievance remains unresolved, the Chief Operations Officer will investigate and make recommendations for resolution.

5. If the grievance continues to remain unresolved, the last person involved in the process is the Chief Executive Officer. The CEO will make recommendations for resolution to all of those involved. The decision at this level is final.

INTERNAL CONTROL: Program Managers will routinely monitor that grievances are documented and appropriately resolved.

Maintaining Participants and Employee's Files in a Confidential and Secure Manner (e.g., HIPAA Compliant When Required)

POLICY: Consumer Direct has established and maintains participant and employee files for the employer in a confidential and secure manner (e.g., HIPAA compliant when required). All paper files, electronic data transmissions, and electronic data are subject to this requirement.

PROCEDURE:

1. Follow existing Consumer Direct office procedures established in compliance with the Data Privacy Act and HIPAA standards. (See HIPAA attachments: *Consumer Direct Data Privacy Statement* and *Notice of Privacy Practices*).
2. Upon initial hire, all Consumer Direct staff receive training on Health Information Privacy and Confidentiality and Data Privacy - HIPAA Procedures. This training is verified by Supervisors and signed documentation is in all Employee files.
3. All employees are trained on the proper storage and disposal of sensitive documents and this is reinforced by Supervisors as needed.
4. All active paper files are kept in locked cabinets until shredded with access granted only on a need-to-know basis.
5. All electronic files are maintained on encrypted, password protected systems with access granted on a need-to-know basis. Consumer Direct employees are assigned a unique username and password at hire and are required to change their password regularly.
6. Access to electronic files is granted with "permissions" approved by the IT Department.
7. Information is only released to authorized personnel with proper identification, i.e. social security number, tax ID number, and when required, a Release of Information.
8. Consumer Direct retains information a minimum of five years. This includes all documentation about the individual and their work and/or services received.
9. Consumer Direct stores archived files in locked, temperature controlled storage. Electronic documents are archived.
10. When records are disposed, a staff person and witness record the name of the individual, the date and method of disposal on the Record Disposal Log.
11. Violations of HIPAA are recorded on a Disclosure Log and reviewed monthly by the HIPAA Compliance Officer.

INTERNAL CONTROL: Program Manager or Director verifies training received by employees and signed documentation is in all employee files. Administrative staff audit all Consumer Direct employee files. The Quality Improvement Manager or their designee completes additional review of these files and conducts an annual internal program review at the local office to ensure that materials are kept confidential.

Materials Development and Training Participation

POLICY: If identified in scope of work, Consumer Direct may develop or assist in the development of materials and trainings.

PROCEDURE:

1. If identified in scope of service, Consumer Direct will assist in the development of curricula, materials, and training and evaluation processes
2. Consumer Direct will ensure that necessary curricula and materials for training are available to staff, Participants, Employees, and Case Managers
3. Consumer Direct will train all Consumer Direct staff on program requirement, materials, and processes
4. If identified in scope of service, Consumer Direct will participate in training of Case Managers and other community partners

INTERNAL CONTROL: The Program Manager, Director and Consumer Direct Quality Improvement team will review materials and training of Consumer Direct staff will be documented

Staying Up-to-Date with Federal, State, Tax, Labor, Immigration, and Worker's Compensation Insurance Laws

POLICY: Consumer Direct (CD) reviews Federal, State, Labor, Immigration, & Worker's Compensation Insurance laws on a monthly basis for required updates to applicable internal policies & procedures per program requirements.

PROCEDURE:

- Prepare any and all documentation required to review & revise internal policies & procedures for updates to Federal, State, Tax, Labor, Immigration, & Worker's Compensation Insurance laws.
 - Payroll Manager reviews IRS, State agencies, & DOL email tax/publication updates upon receipt

- If updates/changes are found during review, Payroll Manager searches IRS, State agencies, & DOL websites for further clarification
- Payroll Manager discusses findings with Program Manager (PM) & Regional Director (RD) (state specific) before changes are implemented with company(s)
 - Payroll Manager updates applicable policies & procedures (P&Ps) manual on CDMS side
 - PM updates applicable P&Ps manual on Local Office (LO) side
- FEA Team Lead review applicable websites monthly for FEA tax form revisions & Unemployment employer/employee relationship exclusions
 - If updates/changes are found during review, FEA Team Lead initials & creates comment for revised form(s) and/or unemployment employer/employee relationship exclusions in Forms Verification spreadsheet found on company Y drive @
\\SERVER05\Company\MHS\Process Change\CDMS - FEA
 - FEA Team Lead provides Quality Improvement (QI) department link(s) to revised form(s)/form instruction(s) for implementation into participant enrollment packet and Y drive areas form instruction(s) are maintained
 - QI completes necessary hardcoding/barcoding before implementing revised form(s)/form instruction(s)
 - QI sends email notification to FEA Team Lead, Payroll Manager, PM & RD (state specific) upon participant packet implementation in CD (state specific) website and applicable Y drive areas for form instruction(s)
- An email is sent from leads/managers to applicable employees for changes/revisions.

INTERNAL CONTROL: FEA Team Lead & Payroll Manager review all applicable laws monthly, provide findings to required departments/persons, and ensure P&Ps are updated when necessary.

Applying for and Obtaining a FEIN for Consumer Direct (CD) to Operate as a Fiscal Vendor Agent (FVA)

POLICY: Consumer Direct (CD) registers and maintains a separate Federal Employer Identification Number (FEIN) for the sole purpose of filing and paying Federal employment taxes under the Fiscal Vendor Agent (FEA) on behalf of participants enrolled in the Fiscal Employer Agent (FEA) program in compliance with IRS regulations, guidelines and procedures.

PROCEDURE:

- Prepare any and all documentation required to register Consumer Direct (CD-state specific) for a FEIN in compliance with IRS regulations, guidelines and procedures.
 - FEA Team Lead fills out Form SS-4 & provides to CD President for review
 - CD President reviews Form SS-4 before signing and provides to FEA Team Lead
 - FEA Team Lead completes FEIN online registration per information found on Form SS-4 and prints EIN print screen pages for confirmation of FVA FEIN
 - FEA Team Lead enters FVA FEIN in CD's FVA EIN field in Microsoft Dynamics SL (SL)
 - FEA Team Lead provides FVA FEIN to Payroll Manager, Tax Reporting Specialist (TRS), Accounts Payable (AP) Manager, Quality Improvement (QI) department (for 2678 agent section), & Program Manager (PM)
 - Upon receipt of CP 575, FEA Team Lead provides Form SS-4, EIN print screen pages, and CP 575 to AP Manager after copying for personal FVA file maintained within FEA team
 - AP Manager saves all relevant documentation in main company Y drive @ Federal EINs under applicable state entity
- Side Note: This is a one-time task completed before participant enrollment packet is implemented in CD (state specific) website

INTERNAL CONTROL: FEA Team Lead registers Consumer Direct (CD-state specific) for FVA FEIN, resolves any issues associated with registering for FVA FEIN, provides FVA FEIN to necessary person(s)/department(s), provides all corresponding information to Accounts Payable (AP) Manager, and AP Manager follows through with all future IRS requirements and correspondence.

Application for Employer Identification Number (FEIN) – Form SS-4 – Internal Revenue Service (IRS)

POLICY: Consumer Direct (CD) registers employer for a Federal Employer Identification Number (FEIN), as soon as employer has wages paid, in accordance with Internal Revenue Service (IRS) regulations, guidelines, and procedures.

PROCEDURE:

- Prepare any and all documentation required to register employer for a FEIN in compliance with IRS regulations, guidelines and procedures.
 - Type set Form SS-4 (if applicable) found in participant's electronic file (DocuWare-DW)
 - Go to <https://sa2.www4.irs.gov/modiein/individual/index.jsp>
 - Click Begin Application

- Check Sole Proprietor and then click Continue
- Check Household Employer and then click Continue
- Click Continue
- Check I am a third party applying for an EIN on behalf of this household employer and click Continue
- Check Yes and then click Continue
- Check Yes, I agree to, and am in compliance with, the above statements. and click Continue
- Fill in requested information per information found on type-set Form SS-4 (if applicable)
- Review Summary Page
- Print Summary Page and then click Continue
- Print EIN Confirmation Page
- Copy & Paste FEIN into EIN field (received from EIN Confirmation Page) in Microsoft Dynamics SL (SL) and update Status field to 'Complete'
- Click Continue
- Click Continue
- Enter FEA Status 'Submitted' for SS-4 in DW
- Initial and date appropriate section (Form SS-4: Application for Employer Identification Number) on Home Office Checklist (state specific)
- Upon receipt of CP 575, update FEA Status of SS-4 to 'Final' in DW
- Scan Notice CP 575 into DW as *EIN Confirmation Ltr*
- IRS Issues/Reference Numbers:
 - If IRS's system states 'Social Security Number (SSN) and Name do not match in their system', print Issue Page
 - Email Local Office (LO) Program Coordinator/Support Coordinator (PC/SC) request for SSN/Name and Other Name(s) verification
 - Update EIN Status to 'SSN/Name' and enter note in 'Notes/Attachments' in SL
 - Initial and date appropriate section (Form SS-4: Application for Employer Identification Number) and write issue on Home Office Checklist (state specific)
 - Upon receipt of correct SSN/Name (possibly copy of Social Security Card (SSC)), typeset Form SS-4 and begin online FEIN application again
 - Update note in SL & on Home Office Checklist of issue resolved
 - Initial and date appropriate section (Form SS-4: Application for Employer Identification Number) and Prior FEIN) on Home Office Checklist (state specific)
 - Scan LO PC/SC email into DW as *Correspondence* if an SCF isn't scanned in to correct SSN
 - Email Auth team in Claims department request update SSN in systems when SCF is not processed for update

- Scan Issue Page into DW as *SS-4 Rejection Letter*
- If IRS's system provides a Reference Number, print Reference Number Page
 - Email LO PC/SC request for SSN/Name & Other Name(s), previously assigned FEIN & information, and/or prior Fiscal Vendor Agent (FVA - state specific) verification with a follow up on a monthly basis if not resolved sooner
 - Fax Form SS-4 IRS during every payroll process (with guardianship paperwork if applicable)
 - *Exception: Fax every week during last month of quarter*
 - Update EIN Status to 'Errors-See Notes' and enter note in 'Notes/Attachments' in SL
 - Initial and date appropriate section (Form SS-4: Application for Employer Identification Number) and write issue on Home Office Checklist (state specific)
 - *If issue isn't resolved the month before quarter end, begin faxing Form 2678 w/Form SS-4 to IRS (with guardianship paperwork if applicable)*
 - Upon receipt of correct SSN/Name (possibly copy of SSC), typeset Form SS-4 and begin online FEIN application again
 - Update note in SL & on Home Office Checklist of issue resolved
 - Initial and date appropriate section (Form SS-4: Application for Employer Identification Number) and Prior FEIN) on Home Office Checklist (state specific)
 - Scan LO PC/SC email into DW as *Correspondence* if an SCF isn't scanned in to correct SSN
 - Email Auth team in Claims department request update SSN in systems when SCF is not processed for update
 - Scan Issue Page into DW as *SS-4 Rejection Letter*
 - Upon receipt of previously assigned FEIN, enter FEIN in EIN field (received from LO PC/SC), update Status field to 'Complete', and enter note in 'Notes/Attachments' in SL
 - Update note on Home Office Checklist of issue resolved
 - Initial and date appropriate section (Form SS-4: Application for Employer Identification Number) and Prior FEIN) on Home Office Checklist (state specific)
 - If received through LO PC/SC email, scan into DW as *Correspondence*
 - If received by IRS Confirmation in LO PC/SC email, print IRS letter and scan into DW as *EIN Confirmation Ltr*
 - If CP 575 or LTR 147C isn't received from any source, scan placeholder into DW as *EIN Conf Ltr Placeholder*
 - Scan Reference Number Page into DW as *SS-4 Rejection Letter*
 - Upon knowledge of previously assigned FEIN, but number is unknown

- Fax Form SS-4 IRS during every payroll process (with guardianship paperwork if applicable)
 - *Exception: Fax every week during last month of quarter*
- Update note in SL & Home Office Checklist of action taken
- Initial and date appropriate section (Form SS-4: Application for Employer Identification Number) on Home Office Checklist (state specific)
- Scan LO PC/SC email into DW as *Correspondence*
- *If issue isn't resolved the month before quarter end, begin faxing Form 2678 w/Form SS-4 to IRS (with guardianship paperwork if applicable)*
- Upon receipt of FEIN or previously assigned FEIN, enter in EIN field (received from IRS fax, mail at CD, prior Fiscal Agent (FVA), or LO email received from employer mail), update Status field to 'Complete', and enter note in 'Notes/Attachments' in SL
 - Update note on Home Office Checklist of issue resolved
 - Initial and date appropriate section (Prior EIN or last line under Form SS-4: Application for Employer Identification Number) on Home Office Checklist (state specific)
 - Update Form SS-4 FEA Status to 'Final' in DW
 - If received by IRS fax, scan IRS fax into DW as *EIN Fax Confirmation*
 - If received by IRS mail (CP 575 or Letter 4228C), scan into DW as *EIN Confirmation Ltr*
 - If CP 575 or LTR 147C isn't received from any source, scan *EIN Conf Ltr Placeholder* into DW
 - Scan Reference Number Page into DW as *SS-4 Rejection Letter*
- Upon knowledge of prior FVA
 - Contact prior FVA to receive previously assigned FEIN and any other applicable employer accounts
 - Continue faxing Form SS-4 to IRS to try to receive actual confirmation EIN from IRS
 - Update note in SL & Home Office Checklist of action taken
 - Initial and date appropriate section (Form SS-4: Application for Employer Identification Number) on Home Office Checklist (state specific)
 - Scan LO PC/SC email into DW as *Correspondence*

INTERNAL CONTROL: FEA Coordinator registers employer for a FEIN, resolves any issues associated with registering for a FEIN, scans all corresponding information into DW, and follows through with all future IRS requirements and correspondence. Confirmation of the employer's



POLICIES AND PROCEDURES

FEIN will be shown as a 'Y' in the 'Proficiency Tracker (PT)' auditing system when *EIN Confirmation Letter* or *EIN Conf Ltr Placeholder* is scanned into DW.

Employer/Payer Appointment of Agent – Form 2678 – Internal Revenue Service (IRS)

POLICY: Consumer Direct (CD) files Form 2678, upon receipt of Federal Employer Identification Number (FEIN) or month before quarter end w/Form SS-4, in accordance with IRS regulations, guidelines, and procedures.

PROCEDURE:

- Prepare any and all documentation required to file Form 2678 in compliance with IRS regulations, guidelines, and procedures.
 - Type-set (if applicable) and print Form 2678 1st page found in participant's electronic file (DocuWare-DW)
 - Print Form 2678 2nd page found @ Y:\\Company\\MHS\\Accounting\\FEA\\(state specific)Tax Forms\\Federal Forms and provide to Payroll Manager for signature
 - Scan Form 2678 2nd page, agent signature page, and staple to 1st page Form 2678 & move document back into Client Cabinet in DW
 - Mail completed Form 2678 to IRS (with guardianship paperwork if applicable)
 - Initial and date appropriate section (Form 2678: Employer/Payer Appointment of Agent) on Home Office Checklist (state specific)
 - Upon receipt of agent approval letter from IRS, scan IRS Letter 1997C into DW as *Ltr 1997C-2678 Conf Letter*
 - If LTR 1997C isn't received from IRS before termination due to issues receiving EIN during enrollment process, scan placeholder into DW as *Ltr 1997C-2678 Conf Placeholder*
- **SIDE NOTE:** CD is authorized as FA effective *mail* date shown on *Ltr 1997C-2678 Conf Letter* but is still held liable to report Federal taxes before approval per Service Agreement between participant and CD.

INTERNAL CONTROL: FEA Coordinator files Form 2678 with IRS, resolves any issues associated with submitting Form 2678 to IRS, scans all corresponding information into DocuWare (DW), and follows through with all future IRS requirements and correspondence. Confirmation of Consumer Direct's (CD) agent approval will be shown as 'Y' in the 'Proficiency Tracker (PT)' auditing system when *Ltr 1997C-2678 Conf Letter* or *Ltr 1997C-2678 Conf Placeholder* is scanned into DW.

Employer/Payer Appointment of Agent – FEIN Reporting Requirement Removal & Revoking Form 2678 – Internal Revenue Service (IRS)

POLICY: Consumer Direct (CD) requests removal of employer Federal Employer Identification Number (FEIN reporting requirements per IRS agent phone conversation request 2013) & revokes Form 2678 in accordance with IRS regulations, guidelines, and procedures.

PROCEDURE:

- Prepare any and all documentation required to revoke Form 2678 in compliance with IRS regulations, guidelines, and procedures.
 - Complete Form 2678 Revocation found on FEA Y drive @
Y:\MHS\Accounting\FEA\Termination Forms\state specific Templates
 - Ensure termination reason selected on top of Form 2678 Revocation to comply with FEIN Reporting Requirement Removal & program EIN closure requirements
 - Copy & Mail completed Form 2678 Revocation to IRS
 - Initial and date appropriate section (2678 Revocation: Employer/Payer Appointment of Agent) on Termination Checklist (state specific)
 - Scan Form 2678 Revocation into participant's electronic file (DocuWare) as *2678 Revocation*
 - Upon receipt of agent revocation letter from IRS, scan Letter 4288C into DW as *2678 Revocation Conf Letter*
 - If *Ltr 1997C-2678 Conf Letter* previously not received from IRS due to issues receiving EIN during enrollment process, scan placeholder into DW as *2678 Revocation Conf Ltr Placeholder*
- **SIDE NOTE:** CD's FA authority is revoked effective *revocation* date indicated in *2678 Revocation Conf Letter* but is still held liable to report Federal taxes for periods which CD was authorized as FA per Service Agreement between participant and CD & IRS regulations, guidelines, and procedures.

INTERNAL CONTROL: FEA Coordinator files revoked Form 2678 with IRS, resolves any issues associated with submitting Form 2678 Revocation to IRS, scans all corresponding information into DocuWare (DW), and follows through with all future IRS requirements and correspondence. Confirmation of Consumer Direct's (CD) agent revocation will be shown as 'Y' in the 'Terminated FEA Documents Tracker (TPT)' auditing system when *2678 Revocation Conf Letter* or *2678 Revocation Conf Ltr Placeholder* is scanned into DW.

Tax Information Authorization – Form 8821 – Internal Revenue Service (IRS)

POLICY: Consumer Direct (CD) submits Form 8821 to receive an employer's previously assigned Federal Employer Identification Number (FEIN) when unable to receive from Form SS-4 in compliance with IRS regulations, guidelines, and procedures.

PROCEDURE:

- Prepare any and all documentation required to submit Form 8821 in compliance with IRS regulations, guidelines, and procedures.
 - Complete Form 8821 found on FEA Y drive @
Y:\\Company\\MHS\\Accounting\\FEA\\(state specific)Tax Forms\\Federal Forms\\Extra Federal Forms for LO Use
 - Email Local Office (LO) Program Coordinator/Support Coordinator (PC/SC) filled out Form 8821 to request employer signature & date
 - Update note in account management system (Microsoft Dynamics SL) & Home Office Checklist (state specific) of action taken
 - Initial and date appropriate section (**Form SS-4: Application for Employer Identification Number or Notes**) on Home Office Checklist (state specific)
 - Upon receipt of Form 8821 in participant's electronic file (DocuWare-DW - scanned by Local Office (LO)), type-set (if applicable) and fax Form 8821 IRS (with guardianship paperwork if applicable)
 - Upon receipt of previously assigned FEIN, enter EIN in EIN field, update Status field to 'Complete', and enter note in 'Notes/Attachments' in SL
 - Update note on Home Office Checklist (state specific) of issue resolved
 - Initial and date appropriate section (Prior EIN) on Home Office Checklist (state specific)
 - Scan *8821 Fax Confirmation* into DW as *8821 Fax Confirmation*

INTERNAL CONTROL: FEA Coordinator ensures Form 8821 is complete before submitted to IRS, resolves any issues associated with submitting Form 8821 to IRS, scans all corresponding information into DocuWare (DW), and follows through with all future IRS requirements and correspondence.

Tax Information Authorization – Revoking Form 8821 – Internal Revenue Service (IRS)

POLICY: Consumer Direct (CD) revokes Form 8821, if previously filed and not expired, in accordance with IRS regulations, guidelines, and procedures.

PROCEDURE:

- Prepare any and all documentation required to revoke Form 8821 in compliance with IRS regulations, guidelines, and procedures (no need to revoke if expired – enter ‘Expired’ on Termination Checklist).
 - Print Form 8821 found in participant’s electronic file (DocuWare-DW)
 - Stamp ‘REVOKE’ above Form 8821 title
 - FEA Coordinator signs, dates, and places title near ‘REVOKE’ stamp
 - Scan *Form 8821 Revocation* into DW as *8821 Revocation*
 - Mail completed *Form 8821 Revocation* to IRS
 - Initial and date appropriate section (8821 Revocation: Tax Information Authorization) on Termination Checklist (state specific)
 - If IRS sends confirmation of *Form 8821 Revocation*, scan LTR 3064C into DW as *8821 Revocation Confirmation Ltr*

INTERNAL CONTROL: FEA Coordinator revokes Form 8821 if previously filed with IRS and isn’t expired, resolves any issues associated with submitting Form 8821 Revocation, scans all corresponding information into DocuWare (DW), and follows through with all future IRS requirements and correspondence.

Power of Attorney and Declaration of Representative – Form 2848 – Internal Revenue Service (IRS)

POLICY: Consumer Direct (CD) submits Form 2848 to receive an employer’s previously assigned Federal Employer Identification Number (FEIN) when unable to receive from Form SS-4 and/or Form 8821 in accordance with IRS regulations, guidelines, and procedures.

PROCEDURE:

- Prepare any and all documentation required to submit Form 2848 in compliance with IRS regulations, guidelines, and procedures.
 - Complete Form 2848 found on FEA Y drive @
Y:\\Company\\MHS\\Accounting\\FEA\\(state specific)Tax Forms\\Federal Forms\\Extra Federal Forms for LO Use
 - Email Local Office (LO) Program Coordinator/Support Coordinator (PC/SC) completed Form 2848 to request employer signature & date
 - Update note in account management system (Microsoft Dynamics SL) & Home Office Checklist (state specific) of action taken
 - Initial and date appropriate section (Form SS-4: Application for Employer Identification Number or Notes) on Home Office Checklist (state specific)

- Upon receipt of Form 2848 in participant's electronic file (DocuWare-DW – scanned by LO), typeset (if applicable) and provide to CD Authorized Representative (AR) for signature and call to IRS
- Update note in SL & on Home Office Checklist (state specific) of action taken
- Initial and date appropriate section (Form SS-4: Application for Employer Identification Number or Notes) on Home Office Checklist (state specific)
- CD AR calls IRS to receive previously assigned FEIN
- CD AR provides previously assigned FEIN and signed Form 2848 to FEA Coordinator
- Enter previously assigned FEIN in EIN field and update Status field to 'Complete' in SL
- Update note in SL & on Home Office Checklist of issue resolved
- Initial and date appropriate section (Prior EIN) on Home Office Checklist (state specific)
- Scan Form 2848 2nd page, staple to Form 2848 1st page, and move back into Client Cabinet in DW

INTERNAL CONTROL: FEA Coordinator ensures Form 2848 is complete before Authorized Representative (AR) submits to IRS, resolves any issues associated with submitting Form 2848, scans all corresponding information into DocuWare (DW), and follows through with all future IRS requirements and correspondence.

Power of Attorney and Declaration of Representative – Revoking Form 2848 – Internal Revenue Service (IRS)

POLICY: Consumer Direct (CD) revokes Form 2848, if previously filed and not expired, in accordance with IRS regulations, guidelines, and procedures.

PROCEDURE:

- Prepare any and all documentation required to revoke Form 2848 in compliance with IRS regulations, guidelines, and procedures (no need to revoke if expired - enter 'Expired' on Termination Checklist).
 - Print Form 2848 found in participant's electronic file (DocuWare-DW)
 - Write 'REMOVAL' above Form 2848 title
 - Provide *Form 2848 Revocation* to Authorized Representative(s) (ARs) whom previously signed Form 2848 for signature by 'REMOVAL' language
 - Scan *Form 2848 Revocation* into DW as *2848 Revocation*
 - Mail completed *Form 2848 Revocation* to IRS
 - Initial and date appropriate section (2848 Revocation: Power of Attorney and Declaration of Representative) on Termination Checklist (state specific)

- If the IRS sends confirmation of *Form 2848 Revocation*, scan LTR 3064C as *2848 Revocation Confirmation Ltr*

INTERNAL CONTROL: FEA Coordinator revokes Form 2848 if previously filed with IRS and isn't expired, resolves any issues associated with submitting Form 2848 Revocation, scans all corresponding information into DocuWare (DW), and follows with all future IRS requirements and correspondence.

Appointment of Agent State Forms

<insert policy, procedure and internal control for obtaining authority to act as a participant's agent with state agencies, including specific forms, websites and other requirements>

POLICY:

PROCEDURE:

INTERNAL CONTROL:

Revoking Appointment of Agent State Forms

<insert policy, procedure and internal control for revoking authority to act as a participant's agent with state agencies, including specific forms, websites and other requirements>

POLICY:

PROCEDURE:

INTERNAL CONTROL:

Enrolling Participant as Employer in State

<insert policy, procedure and internal control for enrolling participant as an employer in the state, including specific forms, websites and other requirements>

POLICY:

PROCEDURE:

INTERNAL CONTROL:

Enrolling Participant as Employer in State for State Unemployment

<insert policy, procedure and internal control for enrolling participant as an employer for the purposes of state unemployment, including specific forms, websites and other requirements >

POLICY:

PROCEDURE:

INTERNAL CONTROL:

Closing Participant's State Employer Accounts

<insert separate policy, procedure and internal control for closing all participant's state employer accounts, including specific forms, websites and other requirements>

POLICY:

PROCEDURE:

INTERNAL CONTROL:

Employee New Hire Reporting – Internal Revenue Service (IRS)

POLICY: Consumer Direct (CD) files employee new hires through the Arizona (AZ) New Hire Reporting Center (portal to Federal new hire reporting system which is tapped into by each state to see which new hires have been reported) within 20 days of new employee hire date in accordance with IRS regulations, guidelines, and procedures.

PROCEDURE:

- Prepare any and all documentation required to report CD (state specific) employee new hires in compliance with IRS regulations, guidelines, and procedures.
 - Notice of Hire – Employment Status and Acknowledgement of Wage Rate(s) form is completed by all employees working for an employer before services can be provided
 - New Hire report is pulled & saved to CSV file following every pay period
 - Employer EIN & Employee Name required to upload into AZ's system
 - Information is still uploaded into AZ's system if any EINs have not yet been received due to EIN issues
 - CSV file is uploaded into AZ's New Hire Reporting Center system
 - Online confirmation is received after the file is uploaded
 - Online confirmation is saved in the New Hire Reporting folder under Payroll in MHS's company Y drive

INTERNAL CONTROL: Tax Specialist reports all Consumer Direct (CD) employee new hires, resolves any issues associated with uploading new hire reports, saves all corresponding information into company Y drive, and follows through with all future employee new hire requirements and correspondence. Notice of Hire – Employment Status and Acknowledgment of Wage Rate(s) form will be shown as a 'Y' in the 'Proficiency Tracker (PT) auditing system after being reviewed by Document Review Department (DRD) in DocuWare (DW).

TAX EXEMPTIONS

POLICY: Consumer Direct maintains a system to ensure that FICA (Social Security and Medicare), FUTA, and SUTA are not withheld or paid for family employees who are exempt in compliance with IRS and <insert state/program specific> regulations. Consumer Direct also maintains a system to meet the 2014-7 income tax exemption, Live-in exemption Shared Living, Companionship and other applicable federal or state exemptions.

PROCEDURE:

1. At least semi-annually, the Payroll/FEA Manager reviews the IRS and <insert state specific> website, mailed materials from taxing authorities, and electronic communications for updates to the rules and regulations for state unemployment and disability insurance taxes.
2. At the time of hire, the employee completes the Participant – Employee Relationship Disclosure (ERD) Form contained in the New Employee Packet.
3. The ERD form is scanned into DocuWare
4. If an employee identifies as qualifying for difficulty of care payments, the 2014-7 Statement of Compliance completed
5. If the employee identifies as qualifying for Live-in, Shared Living, Companionship or other applicable DOL exemptions appropriate forms completed
6. Caregiver Entry staff enter the exemption(s) into the payroll system as indicated by the employee on the ERD and other exemption forms
7. The accounting/information system is programmed to identify exempt employees
8. No deductions are withheld from the pay for any employee so identified in the system

INTERNAL CONTROL: Reviewed by Payroll/FEA Manager during Quarterly Report filing. Employee Proficiency Tracker review by QI to ensure report is on file.

Employer's Quarterly Federal Withholding, Social Security, and Medicare Withholding Tax Return – Form 941 and Schedules B&R – Internal Revenue Service (IRS)

POLICY: Consumer Direct (CD) files Federal withholding (WH), social security, and Medicare taxes (FICA) quarterly in the aggregate using IRS Form 941 and Schedules B&R under CD's (state specific) separate Fiscal Agent Federal Employer Identification Number (FEIN) in accordance with IRS regulations, guidelines, and procedures.

PROCEDURE:

- Prepare any and all documentation required to file Federal WH and FICA taxes in compliance with IRS regulations, guidelines, and procedures.
 - Microsoft Dynamics (SL) computes and withholds WH & FICA taxes
 - WH withheld based on employee earnings, exempt status, and allowances claimed on W-4
 - FICA withheld from employee earnings with employer contribution
 - WH & FICA taxes deposited each pay period via EFTPS according to appropriate schedule listed in Publication 15 Circular E, Employer's Tax Guide
 - At quarter end, a report is ran showing wages paid for quarter and WH & FICA taxes due
 - Form 941 and Schedules B & R completed and provided to Payroll Manager for review (see Form 941 and instructions)
 - Form 941 and Schedules B & R reviewed and provided to Corporate Officer for signature
 - Form 941 and Schedules B & R signed and provided to Tax Specialist for filing
 - Form 941 and Schedules B & R filed with IRS quarterly by end of month after quarter end for which taxes are due
 - Tax Specialist scans and files all relevant paperwork/documentation in Payroll Y drive @ <\\SERVER05\\Company\\MHS\\Accounting\\Payroll> in applicable reporting folder

INTERNAL CONTROL: Payroll Manager reviews all WH & FICA taxes to be deposited and filed, Tax Specialist deposits and reports all WH & FICA taxes, Tax Specialist files all corresponding information in company Y drive, and Tax Specialist follows through with all future IRS requirements and correspondence.

Employee's Contribution Refunded for Over Collected Medicare and Social Security Taxes (FICA) & Adjusted Employer's Quarterly Federal Tax Return – Form 941X

POLICY: Consumer Direct (CD) refunds over collected FICA taxes to employee's when employee's wages did not surpass the threshold wage amount for paying FICA and files Form

941X to amend applicable reports previously filed in accordance with IRS, Household Worker Medicare, and Social Security Tax regulations, guidelines, and procedures.

PROCEDURE:

- Prepare any and all documentation required to refund over collected FICA taxes to employees and amend applicable reports previously filed in compliance with IRS, Household Worker Medicare, and Social Security Tax regulations, guidelines, and procedures.
 - a. After final payroll in December, Tax Specialist runs a report summarizing wages earned year-to-date by each CD (state specific) employee (including terminated employees) to identify all employees who have not earned the threshold wage amount for the year
 - FICA wage threshold may change and is updated during applicable years according to annual Publication 15 (Circular E), Employer Tax Guide
 - b. Full amount of over collected FICA is refunded to each applicable employee
 - c. Applicable amendments are completed on Form 941X and provided to Payroll Manager for review (see Form 941X and instructions)
 - d. Form 941X is reviewed and provided to Corporate Officer for signature
 - e. Form 941X is signed and provided to Tax Specialist for filing
 - f. Form 941X filed with IRS
 - g. All relevant paperwork/documentation is scanned and filed in Payroll Y drive @ [\\SERVER05\\Company\\MHS\\Accounting\\Payroll](#) in applicable reporting folder

INTERNAL CONTROL: Payroll Manager reviews all amendments/schedules to be dispersed, Tax Specialist provides all schedules to accounting team, Tax Specialist amends applicable previous reports filed, Tax Specialist files all corresponding information in company Y drive, and Tax Specialist follows through with all future IRS requirements and correspondence.

Employer's Annual Federal Unemployment Tax (FUTA) Return – Form 940 & Schedule R – Internal Revenue Service (IRS)

POLICY: Consumer Direct (CD) files Federal unemployment insurance taxes (FUTA) annually in the aggregate using IRS Form 940 & Schedule R under CD's (state specific) separate Fiscal Agent Federal Employer Identification Number (FEIN) in accordance with IRS regulations, guidelines, and procedures.

PROCEDURE:

- Prepare any and all documentation required to file FUTA taxes in compliance with IRS regulations, guidelines, and procedures.
 - a. Microsoft Dynamics (SL) computes FUTA for paid direct workers (PDWs) each payroll period
 - b. FUTA taxes deposited quarterly via EFTPS according to appropriate schedule listed in Publication 15 Circular E, Employer's Tax Guide
 - c. At year end, a report is ran showing wages paid for year and FUTA taxes due for each CD (state specific) employer
 - d. Form 940 & Schedule R completed and provided to Payroll Manager for review (see Form 940 and instructions)
 - e. Form 940 & Schedule R reviewed and provided to Corporate Officer for signature
 - f. Form 940 & Schedule R signed and provided to Tax Specialist for filing
 - g. Form 940 & Schedule R filed by end of January with IRS
 - h. Tax Specialist scans and files all relevant paperwork/documentation in Payroll Y drive @ <\\SERVER05\\Company\\MHS\\Accounting\\Payroll> in applicable reporting folder

INTERNAL CONTROL: Payroll Manager reviews all FUTA taxes to be deposited and reports to be filed, Tax Specialist deposits and reports all FUTA taxes, Tax Specialist files all corresponding information in company Y drive, and Tax Specialist follows through with all future IRS requirements and correspondence.

Wage and Tax Statement – Form W-2 – Internal Revenue Service (IRS)

POLICY: Consumer Direct (CD) distributes and files Form W-2 for FEA employees in accordance with IRS regulations, guidelines, and procedures.

PROCEDURE:

- Prepare any and all documentation required to prepare, distribute, and file Form W-2 in compliance with IRS regulations, guidelines, and procedures.
 - Form W-2 reconciliation spreadsheet created to ensure total amounts equal amounts generated on W-2
 - Microsoft Dynamics (SL) generates Form W-2
 - Form W-2 printed and mailed to employee by date designated by IRS
 - Form W-2 filed by end of January with Social Security Administration (SSA)

- Tax Specialist scans and files all relevant paperwork/documentation in Payroll Y drive @ <\\SERVER05\\Company\\MHS\\Accounting\\Payroll> in applicable reporting folder

INTERNAL CONTROL: Payroll Manager reviews Form W-2 reconciliation spreadsheet prior to Form W-2's being printed, Tax Specialist distributes and files Form W-2 with IRS, Tax Specialist files all corresponding information in company Y drive, and Tax Specialist follows through with all future IRS requirements and correspondence.

Transmittal of Wage and Tax Statements – Form W-3 – Internal Revenue Service (IRS)

POLICY: Consumer Direct (CD) files Form W-3 for FEA employers in accordance with IRS regulations, guidelines, and procedures.

PROCEDURE:

- Prepare any and all documentation required to prepare and file Form W-3 in compliance with IRS regulations, guidelines, and procedures.
 - Form W-3 reconciliation spreadsheet created to reconcile W-2s with Forms 941
 - Microsoft Dynamics (SL) generates Form W-3
 - Form W-3 prepared for each employer
 - Form W-3 filed by end of January with Social Security Administration (SSA)
 - Copy W-3s and reconciliation spreadsheet provided to General Ledger (GL) Manager for reconciliation to financial statements
 - Tax Specialist scans and files all relevant paperwork/documentation in Payroll Y drive @ <\\SERVER05\\Company\\MHS\\Accounting\\Payroll> in applicable reporting folder

INTERNAL CONTROL: Payroll Manager reviews Form W-3 reconciliation spreadsheet prior to Form W-3's being filed, Tax Specialist files Form W-3 with IRS, Tax Specialist files all corresponding information in company Y drive, and Tax Specialist follows through with all future IRS requirements and correspondence.

Processing Vendor Payment Requests

POLICY: Consumer Direct will process vendor payment requests submitted by Participants

PROCEDURE:

1. All Vendor Payment Requests (VPR) are date stamped upon receipt at the Consumer Direct office.
2. The Program Coordinator reviews the request for payment form to ensure that it

- has been completed correctly. A voided receipt, unpaid invoice, or hard quote must also be attached.
3. The Program Coordinator reviews the request, specifically verifying the following:
 - a. Participant Name and ID are on the VPR form
 - b. Vendor Name and Address are on the VPR form
 - c. W-9 is On File or Attached
 - i. A W-9 is required for any vendor providing a service, and for any vendor that is not incorporated (i.e. "Inc" or "Corp" designation)
 - d. Item/Service is Authorized on the Support and Spending Plan (SSP)
 - e. Service Code on VPR Matches the Authorized Service Code on the SSP
 - f. VPR Amount is Approved on the SSP
 - i. Single purchase amount does not exceed the authorized amount
 - ii. Total purchases of item/service do not exceed the authorized amount or total units
 - g. Funds are Available in the Remaining Budget
 4. If there are any problems with the Request or documentation, the Program Coordinator will contact the Participant by email and/or phone to correct the problem
 5. If the Request is determined to be complete, correct, and there are sufficient funds remaining in the budget category, it will be scanned into DocuWare for processing by the CDMS Data Entry and Accounts Payable departments.
 6. The week of payroll, as soon as the payroll processing is complete, Data Entry will enter all the Vendor Payment Requests that have been scanned or corrected and are ready to be processed.
 7. Once entry is complete, Data Entry will notify Accounts Payable to pull all the Vendor Payments on the Tuesday of payroll week.
 8. Vendor Payment checks will be placed in the mail on or before Thursday of the week they are processed.
 9. Consumer Direct issues a check made out to the Vendor, Agency, or Independent contractor. Vendor checks are mailed to the Participant. Agency and Independent Contractor checks are mailed directly to the Agency or I/C unless Consumer Direct has been specifically requested to send the check to the Participant.
 - a. An Agency or Independent Contractor agreement with the Participant must be submitted or on file for the checks to be mailed directly to the provider. In the absence of an Agency or I/C agreement, the provider is considered a vendor and the checks are mailed to the Participant for distribution.
 10. A copy of the processed VPR is maintained as an electronic file in DocuWare.
 11. Only expenses specifically approved on the Participant's Support and Spending Plan will be paid.

INTERNAL CONTROL: When Accounts Payable prints a check, the check number and issue date are recorded on the VPR form in DocuWare. Report in the computerized accounting/information system documenting all vendor payments on behalf of a Participant

IRS Form 1099

POLICY: Consumer Direct's Accounting Department will issue Form 1099-Misc to any independent contractor who has been paid \$600 or more in a calendar year

PROCEDURE:

1. Consumer Direct's accounting system tracks which independent contractors pass the \$600 threshold
2. The Accounting Department processes and electronically files Form 1099 per IRS regulations by February 28th
3. The Payroll Department mails Form 1099 to all independent contractors that have passed the threshold by January 31st

INTERNAL CONTROL: Consumer Direct's accounting system generates a report which is reviewed by the Accounts Payable and Accounting department at year end.

IRS Form 1096

POLICY: Consumer Direct files an IRS Form 1096, *Annual Summary and Transmittal of US Information Returns* and related Form 1099s to comply with federal requirements.

PROCEDURE:

1. A W-9 form is required to setup a new vendor account for individual or business payments
2. W-9 forms are required for vendor setup and are maintained in the electronic filing system.
3. Payments made to a business or individual are tracked throughout the calendar year.
4. Per the 1099 instruction requirements, the form 1099s are issued to individuals, partnerships, estates, and applicable corporations by January 31st of the following year
5. A form 1096 is compiled for each type of completed form 1099.
6. The forms 1096 and 1099s are mailed to the IRS by February 29th of the following year or electronically filed if there are more than 250 information returns of any one type.

INTERNAL CONTROL: The form 1099 is created and reviewed by different individuals than those setting up new accounts and issuing checks. Prior to issuing form 1099 and 1096 annually, the federal requirements and IRS publications and instructions are reviewed for possible changes.

IRS Form SS-8

POLICY: Consumer Direct will file Form SS-8 if a worker's employment status is unclear in accordance with IRS regulations

PROCEDURE:

1. The Program Office will provide the worker with the Form SS-8
2. The Payroll Department will file the form per IRS instructions
3. Upon receipt of the decision from the IRS, payment will be processed if the vendor is determined to be an Independent Contractor.
4. The IRS decision will be required before the worker is processed and paid.

INTERNAL CONTROL: The IRS determination will be filed in DocuWare

Verifying Employee's Hourly Wage For Regular Pay

POLICY: Consumer Direct verifies that employees' hourly wage is in compliance with program requirements

PROCEDURE:

1. The Consumer Direct Payroll Department reviews mailed materials received from various taxing authorities and reviews all Federal Department of Labor, State Department of Labor, and any other applicable web sites for changes to the federal and state wage and hour rules on at least a semi-annual basis
2. The Participant completes a 'wage agreement' form with his/her employee at hire and if adjustments to rate of pay are made.
3. The Program Office reviews the proposed rate to ensure compliance with wage & hour and program rules
4. The 'wage agreement' form is scanned into DocuWare
5. Caregiver Entry enters the rate into the accounting/information system
6. Caregiver Entry notifies the Program Office of any questions related to wages
7. The Program Office communicates questions to the Participant to clarify wages and services.
8. As necessary, the Program Office obtains a corrected or revised 'wage agreement' form to ensure that each employee's wage is accurate.

9. The corrected or revised 'wage agreement' form is scanned into DocuWare.
10. Caregiver Entry enters revised data into the accounting/information system.

INTERNAL CONTROL: The Payroll/FEA Manager randomly reviews a percentage of the employees' pay rates against 'wage agreement' forms to ensure the pay rate is correct as part of the check preview process.

Collecting Employee Time

POLICY: Consumer Direct collects and maintains records of employee time and mileage to ensure that payroll is processed accurately and consistently in accordance with Federal and State laws.

PROCEDURE:

The payroll schedule is issued to the Participant at enrollment and to the Employee upon hire. Current payroll schedules can be found on the Consumer Direct website at [<insert state specific website>](#).

1. Participants, employees and Vendors are trained on options for submitting time and/or goods and services provided.
2. Online Entries via Web Portal:
 - a. The most accurate and efficient manner for submitting, approving, and payment of time and mileage is by using Consumer Direct's Web Portal
 - b. All employees and Participants have their own unique credentials.
 - c. An employee enters their time and mileage records into the portal on a schedule determined with their employer, typically on a weekly or bi-weekly basis.
 - d. Once the employee's time has been entered, the Participant can log into the portal, review their employee's entries, and approve their time/mileage for payment.
 - e. The portal eliminates the use of unauthorized service codes, incorrect or illegible time entries, and overlapping time issues. Thus, once the time/mileage has been approved, it is automatically queued for processing with the next regular payroll
 - f. All online time must be entered and approved by Monday at midnight on the week marked on the payroll calendar for timesheet submittal in order to be included with the current payroll cycle
 - g. Time or mileage approved after that time will be queued for the next regular payroll cycle

3. Paper Time and Mileage Sheets

- a. For those Participants who elect to utilize paper time and mileage sheets, the employee records hours worked on a Consumer Direct approved time sheet. Mileage is recorded on an approved mileage sheet
 - b. The Participant and employee sign and date the time and mileage sheets indicating that the hours worked and/or miles claimed and tasks performed by the employee are accurate
 - c. The Participant's signature and date authorizes payment
 - d. Consumer Direct collects all time/mileage sheets per the published payroll schedule via email, fax, mail, or submission
 - e. All time and mileage sheets must be received by midnight on Monday of timesheet week or they are considered late and are not guaranteed to be included with the current payroll cycle
 - f. Upon receipt the time/mileage sheet is placed in Docuware
 - g. The time/mileage sheet is read by Optical Character Recognition (OCR) software and entered into the payroll system
 - i. If there are errors on the time/mileage sheet such as missing signature, dates, overlapping time, or service codes the employee is not authorized to use, payment for those entries is held
 - ii. The Participant is contacted for confirmation or follow-up
 - iii. The employee will be paid when resolution is achieved.
 - h. Participants and employees are informed at enrollment, on the time/mileage sheets, and periodically with newsletters that errors on time/mileage sheets or delay in online approval may result in late pay
4. Follow-up communication regarding errors and any necessary retraining is documented in CRM.

INTERNAL CONTROL: Electronic records found in Service Log and copies of Time/Mileage Sheets in Docuware. Documentation in CRM that the Participant has been contacted regarding errors.

Preparing Employee's Payroll Checks and Payroll Statement

POLICY: Consumer Direct will accurately, consistently, and reliably prepare employee's payroll checks and payroll statements (check stub)

PROCEDURE:

1. Caregiver Entry and the Payroll Coordinator have previously entered payroll information about each employee into the system, based on forms completed in the enrollment packet (e.g. W-4)

2. Service Log entries are created via the Web Portal or by Data Entry processing paper time/mileage sheets. All appropriate Service Log entries are released to Payroll for processing and payment
3. Data Entry runs Prebill to verify the validity of all Service Log entries.
 - a. If there are any problems such as missing rates, overlapping time, or authorization issues, those errors will be corrected with the assistance of the appropriate departments as needed.
4. Payroll Coordinator runs a "Zero Pay" report indicating if there are missing units, rates of pay, or authorization issues
 - a. If there is missing data, Payroll contacts Data Entry to make corrections
5. Payroll Coordinator processes assigned benefits and payroll deductions
6. Payroll Coordinator verifies that rate of pay multiplied by the hours worked per each pay period is equal to the gross pay by spot checking a random sample during review of the check preview report
7. Payroll Coordinator prepares payroll checks and issues them to employees, either by direct deposit, paper check, or pay card, and also issues payroll statements to each employee.
8. The payroll statement includes:
 - Name of employee/community support worker
 - Average hourly rate of pay
 - Total hours worked
 - Gross pay
 - A list of all deductions (taxes, insurance, garnishments, and other)
 - Net pay
 - Pay period ending date

INTERNAL CONTROL:

Transfer Edit Report (all service log entries) will be run prior to preparing the actual payroll to ensure payroll is correct and the computerized accounting/information system is programmed accurately. Review of the check preview for any unusual transactions.

Paying Employees by Direct Deposit

POLICY: Consumer Direct offers direct deposit to all employees

PROCEDURE:

1. The employee completes a Pay Selection form, included in New Employee Packets, and provides a voided check or a document from their bank indicating the routing and account numbers. An Employee can also choose a bank card.
2. The Consumer Direct staff review the Pay Selection form to make certain it is completed correctly and completely.

3. If the form is completed correctly the form is scanned into DocuWare.
4. If there is missing information or an error on the Pay Selection form, Consumer Direct contacts the employee to obtain the missing or corrected information.
5. Caregiver Entry staff enter the employee's bank routing and account numbers into the computerized accounting/information system as part of the employee's electronic record.
6. The Payroll Coordinator will verify the employee's bank account information by submitting the bank routing and account information to his/her bank as a pre-note with the next regular payroll run.
7. Payroll receives a report from the bank indicating the status of the pre-note:
 - a. If the pre-note was successful, the employee's electronic record in the system is marked to indicate the account information has been successfully pre-noted and direct deposit is authorized.
 - b. If there is any problem with the pre-note information uploaded to the bank, the Payroll Coordinator will either correct the problem or contact the local office staff for assistance who will contact the employee to verify and correct the information
 - c. The corrected document(s) will then be scanned to DocuWare for processing and pre-noting, starting with step 5 above.
8. The employee will receive a paper check until their bank account is successfully pre-noted.
9. Once successfully pre-noted, the Payroll Department will disburse employee pay through direct deposit until cancelled by the employee.
10. If problems are encountered with direct deposit, e.g. bank is sold, routing numbers change, account is closed, etc., a paper check is sent to the employee until direct deposit has been reestablished.

INTERNAL CONTROL: A file for direct deposit is created and uploaded to the federal ACH system. Once uploaded, the totals are verified against the internal ACH report by the Payroll Coordinator and a Direct Deposit Bank Report is printed from the bank website. A senior financial staff member reviews and releases the ACH batch at the bank website. The Payroll Coordinator verifies that each ACH batch has been released. Payroll/FEA Manager monitors the process.

Processing All Judgments, Garnishments, Tax Levies, or Any Related Holds on Participant-Employed Support Service Worker's Pay

POLICY: Consumer Direct processes all judgments, garnishments, tax levies, or any related holds on employee pay as may be required by local, state, and/or federal laws.

PROCEDURE:

1. Payroll Assistant logs all judgments, garnishments, and tax levies
2. Payroll Coordinator reviews the garnishments, tax levies, or any related holds; enters data into the employee's electronic payroll file and withholds payment as proscribed
3. Accounts Payable remits payments timely to the appropriate agency in accordance with the garnishments, tax levies, or any related holds
4. Payroll Coordinator enters change in computerized accounting/information system to reflect that garnishments are not paid when writs are expired

INTERNAL CONTROL: General Ledger verifies that the amount withheld from the employee's pay was paid to the appropriate agency. Variance report reflects change in pay and Payroll/FEA Manager confirms garnishment or lack thereof

Unclaimed Property

POLICY: Consumer Direct will report all uncashed or returned PDW payroll checks or vendor's payments for individual-directed goods and services per the <insert state specific information>.

PROCEDURE:

1. Consumer Direct prepares bank statement reconciliations on a monthly basis and all outstanding checks are reviewed for stale dated items.
2. Annually, Consumer Direct reviews outstanding checks for payroll and vendor payments and the applicable dormancy period.
3. Consumer Direct will make reasonable efforts to locate owners of stale dated items, through written notice sent to the owner's last known address.
4. Consumer Direct will prepare and electronically file all unclaimed property accounts in NAUPA format.
5. <Insert state specific unclaimed property requirements, forms, etc.>

INTERNAL CONTROL: Prior to providing written notice to the presumed owner and filing with the <insert state agency responsible for unclaimed property> annually, the applicable statutes will be reviewed for possible changes. There is separation of duties between individuals who review unclaimed property, contact the presumed owner, and file with the Unclaimed Property Unit.

Lost, Stolen, or Improperly Issued Checks or Improperly Cashed Checks

POLICY: Consumer Direct will re-issue lost, stolen, or improperly issued checks at no expense to the Participant or the Department. Consumer Direct tracks and logs occurrences of improperly cashed or issued checks and shall stop payment on checks when necessary

PROCEDURE:

1. Consumer Direct processes all approved time sheets, mileage sheets, and vendor payment request forms as outlined in relevant procedures
2. All payments will be documented in the accounting/information system that accurately tracks the status of payments
3. The Payroll Coordinator/Accounts Payable Clerk will research any payroll inquiry or vendor payment inquiry related to lost, stolen, or improperly issued checks and work with the Program Coordinator and Data Entry to resolve any problems
4. Any contact with a participant/employee related to these issues is recorded in CRM
5. Lost or stolen checks will be reissued within 14 calendar days of when the error occurred, provided Consumer Direct is aware of the situation within that timeframe at no expense to the Participant
6. If the error is Consumer Direct's, a special payroll is run for improperly issued checks at no expense to the Participant
7. The Payroll Coordinator/Accounts Payable Clerk will stop payment on checks when necessary
8. Consumer Direct scans all documents related to lost, stolen, or improperly issued checks or improperly cashed checks into the electronic files (DocuWare or CRM)
9. Checks will be logged on a spreadsheet when it is discovered that a check was improperly issued, reissued, or cashed.
 - a. Original check information, check issue, action steps and reissued check information is tracked

INTERNAL CONTROL: Report generated by the computerized accounting/information system of lost, stolen, or improperly issued checks or improperly cashed checks.

VF/EA FMS and Support Broker Reporting Requirements

POLICY: Consumer Direct Support Broker and VF/EA FMS divisions will report all data on a timely and consistent basis

PROCEDURE:

1. As identified in scope of work, Consumer Direct will compile all required data into agreed upon format.

2. Consumer Direct Program Manager will ensure reports are submitted by stated deadlines.
3. Confirmation of receipt will be maintained in the report folder on company Y Drive.

INTERNAL CONTROL: The Program Manager or Director will review prior to submission.

Annual Satisfaction Survey and Quality Improvement

POLICY: Consumer Direct Support Broker and VF/EA FMS divisions will conduct an annual satisfaction survey of active participants

PROCEDURE:

1. Annual Satisfaction Survey
 - a. Annually, the Quality Improvement Department will conduct a satisfaction survey of the Support Broker and VF/EA division services
 - b. The survey will contain questions regarding Participant's satisfaction with type of assistance received, usefulness of materials, customer service, and suggestions for improvement
 - c. Responses are submitted directly to the Quality Improvement Department
 - d. The Quality Improvement Department compiles the data, including all comments, and creates an annual satisfaction survey report that is presented to the Executive Team, Operations Director, and the Program Manager
 - e. The Program Manager will identify areas and suggestions for improvement
2. Peer Network
 - a. Consumer Direct will invite interested Participants to participate in the Peer Network
 - b. The Peer Network meets regularly to discuss ideas for improving services and ways to address industry changes
3. Ongoing Feedback and Monitoring
 - a. Consumer Direct will address feedback received

INTERNAL CONTROL: The Quality Improvement Department conducts the survey and compiles results independent of the Support Broker or VF/EA division. The Community Relations Coordinator organizes the Peer Network meetings and gathers input. The Program Manager and Operations Director ensure implementation for improvement or addresses concerns.

Brokering Workers' Compensation Insurance

POLICY: Consumer Direct has a system in place to process and pay worker's compensation insurance policies for each individual it represents in accordance with workers' compensation law

PROCEDURE:

1. Consumer Direct offers individual employers coverage under the company policy or via individual policies
2. Documentation that worker's compensation coverage is in place and payment has been made can be obtained at any time from Consumer Direct

INTERNAL CONTROL: Annually, the Risk Management staff, Chief Financial Officer, and Compliance Officer review the companies policy and make changes as necessary

Medicaid Funds Management

POLICY: Consumer Direct will ensure the appropriate use and tracking of Medicaid funds.

PROCEDURE:

1. Consumer Direct will maintain an accounting and information system for receiving, disbursing, and tracking all transactions, including providing Participants and state or program representatives with access to spending summaries.
2. Consumer Direct will establish a separate bank account for funds received for the <insert state or program>
3. Consumer Direct will use fees for operation to absorb any charges associated with the bank account
4. Consumer Direct will establish electronic funds transfer when possible
5. Consumer Direct will ensure funds are not comingled with any other program funds

INTERNAL CONTROL: There is segregation of duties and multiple levels of approval within the Accounting Department to process deposits and payments. The CFO and Controller review transactions and maintain banking records. Annual independent auditors review all billing, accounts payable, payroll, and deposit records.

Verifying Participant Eligibility

POLICY: Consumer Direct will verify participant eligibility as identified in contract scope of work.

PROCEDURE:

1. Consumer Direct will verify Participant eligibility on a <insert program specific frequency>
2. <insert program specific website or process>

PROCEDURE: Proof of eligibility or a given period will be maintained in the Participant's electronic file.

Administrative Fee Submission

<adjust based on program specific requirements>

POLICY: Per Member Per Month, Participant enrollment fees and Employee enrollment fees are submitted accurately and timely via invoice.

PROCEDURE:

1. Fees are created in Microsoft Dynamics SL, Consumer Direct Care Network's business management software.
2. Fee generation is contingent on Consumer Direct's receipt of complete and accurate Participant and employee paperwork. Because the process of completing, receiving, and processing paperwork is not immediate, fees for one month may be created at a later month. Additionally, the billing of fees for one month might be submitted at a later month.
3. Fees are submitted <insert program specific requirements for submission>
4. Claims are paid via Electronic Funds Transfer (EFT) or check
5. Consumer Direct manually reconciles based on accounts payable invoice using Microsoft Dynamics SL.
6. Administrative Fees are submitted monthly.

INTERNAL CONTROL: If an active prior authorization is not entered into Microsoft Dynamics SL a Per Member Per Month fee will not be generated or submitted on the monthly invoice. Invoices are reviewed by the Manager or Director prior to submission to verify accuracy.

Claim Submission

<adjust based on program specific requirements>

POLICY: Claims for services are submitted timely and accurately.

PROCEDURE:

1. Participant and employee information based on current eligibility, authorized service parameters and budget is entered into **Microsoft Dynamics SL**, Consumer Direct Care Network's business management software.
2. Employees and participants are then able to submit and approve shifts within the aforementioned parameters managed by **Microsoft Dynamics SL**. Payroll for employee shifts are then processed by Consumer Direct. System checks based on program specific business rules are put into place.
3. Claims are then created in **Microsoft Dynamics SL**.
4. HIPAA compliant claim form, ANSI X12 5010 837P file, is created by Consumer Direct using **1EDI** software, which is used to create and translate ANSI files.
5. To collect payment for claims, Consumer Direct uploads ANSI X12 5010 837P files with National Provider Identifier (NPI) to <insert program specific billing requirements>
6. When received, electronic HIPAA compliant claim forms (ANSI X12 5010 835P file) are translated by Consumer Direct using **1EDI**.
7. Claims are paid by Electronic Funds Transfer or check.
8. Consumer Direct receives a remittance advice with detailed claim information. Consumer Direct reconciles against claim information on a claim by claim basis using the **Microsoft Dynamics SL**.
***Suspended or denied claims resubmitted within contract specific timely filing requirements.
9. Claims are submitted bi-weekly corresponding to Consumer Direct payroll cycle for eligible participants and service.

INTERNAL CONTROL: If an active prior authorization is not entered into Microsoft Dynamics SL time or goods and services cannot be paid and prevents billing. Comparison of claims billed and paid are reconciled after each remittance advice is received.



Appendix C: Business Continuity Plan

Consumer Direct Management Solutions Business Continuity Plan Consumer Direct Colorado

December 2017



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1 Overview

This Plan provides critical information to use in addressing events that impact the ability of Consumer Direct to deliver business services. The information is organized from two perspectives: 1) Data specific to the Consumer Direct Management Solutions (CDMS) company, headquartered in Missoula, Montana which provides support to Consumer Direct Colorado; and, 2) Data specific to the Consumer Direct Colorado (CDCO) company, based in Denver, Colorado.

This Plan is updated on a regular basis, at least twice yearly, and reviewed with principals from CDMS and CDCO.

2 How To Use This Plan

The Plan covers two entities:

1. Consumer Direct Management Solutions (Chapter 3): Central office services, covering these departments: Executive Team, Information Technology, Accounting, Billing, Authorizations, HR, Payroll, Data Entry, Call Center, Quality Improvement, Risk Management and Analytics.

2. Consumer Direct Colorado (Chapter 4): Program services delivered out of the Denver, Colorado office.

Use this plan to:

A. Determine who to call/contact when an event occurs: The Call Plan section lists the sequence for escalating communications concerning an event.

B. Find detailed contact information for staff and vendors: The Key Personnel Section and External Contacts section provides detailed contact information.

C. Understand contingency plans for offices, equipment, and staff: The Site Data Matrix provides detailed information on current provisioning of equipment and services, how to handle temporary outages, and how to handle extended outages.

3 Consumer Direct Management Solutions

This section describes business continuity information for the CDMS business. CDMS operates one office in the Missoula, MT area:

| Office Location | Primary Function |
|-------------------|---|
| CDCN Headquarters | Executive management, QI, Development, IT, Accounting, Payroll, HR, Authorizations/AP |

Site/Outage information for each site is included in this Plan.

3.1 Call Plan

The following table lists resources available to assist in the event of a business interruption. Calls should start at Level 0 and proceed to subsequent levels if the contact is not available.

For emergencies, dial 911

| Central Office Event Call Plan | | | | |
|--------------------------------|----------------------|-----------------|-----------------------------------|------------------------------------|
| Central Office | | | | |
| 0 | Main Office | Reception | | O: 406-532-1900 |
| 1 | Help Desk | Main | ithelpdesk@consumerdirectcare.com | O: 406-532-1940 |
| 2 | | Tyler Mickelson | tylerm@consumerdirectcare.com | O: 406-532-2951 C: 406-493-2860 |
| 3 | Engineering | Tim Rich | timr@consumerdirectcare.com | O: 406-532-2003 C: 406-370-2049 |
| 4 | | Bill Gilbert | billgi@consumerdirectcare.com | O: 406-303-3018 C: 406-529-7627 |
| 5 | Executive Management | Jeff Harriott | jeffh@consumerdirectcare.com | O: 406-532-1979 C: 406-830-4562 |
| 6 | | Daryl Holzer | darylh@consumerdirectcare.com | O: 406-532-1909 C: 406-544-1929 |

3.2 Key Personnel

The following chart lists key personnel in the Missoula area. These staff are referred to in the Event/Responsibility Matrix in the subsequent section of this Plan.

| Role | Name | Telephone | Alias ¹ | Backup |
|------------------------------|-----------------|--------------------------------------|--------------------|-----------------|
| CFO | Daryl Holzer | 406-532-1909 | DarylH | Jeff Harriott |
| COO | Beth Peterson | 406-532-7605 | BethP | Jeff Harriott |
| CIO | Jeff Harriott | 406-532-1979 | JeffH | Tim Rich |
| Director – Claims Processing | Steve Rosenbaum | 406-532-2004 | SteveRo | Jeff Harriott |
| Risk Management | Kathy O'Conner | 406-532-1930 – O 406-546-5837 – C | KathyO | Holly Stephens |
| Risk Management | Holly Stephens | 406-532-1929 – O 406-468-5265 – C | HollyS | Daryl Holzer |
| Facilities | Ben Schmidt | 406-303-3026 – O 406-274-3000 – C | BenS | Dan Clukas |
| Facilities | Dan Clukas | 406-303-3009 – O 406-493-2825 – C | DanielC | Daryl Holzer |
| IT Engineering | Tim Rich | 406-532-2003 – O 406-370-2049 – C | TimR | Chris Port |
| IT Engineering | Chris Port | 406-532-1902 | ChrisP | Art Sikkink |
| IT Engineering | Art Sikkink | 406-532-2958 | ArthurS | Chris Port |
| Payroll | Katie Trotter | 406-532-1931 | KatieT | Daryl Holzer |
| Data Entry | Donna Brinda | 406-532-1916 | DonnaB | Steve Rosenbaum |
| Controller | Wendy Stucker | 406-532-2948 | WendyS | Daryl Holzer |
| CDMT | Katie Spaid | 406-532-1609 | KatieS | Kathy O'Connor |
| FCCS | Katie Spaid | 406-532-1609 | KatieS | Chris Berthoud |
| FCCS | Chris Berthoud | 406-532-1613 | ChrisB | Kathy O'Conner |

¹: Alias is for **consumerdirectcare.com** domain

3.3 Event/Responsibility Matrix

This section defines the primary party responsible for acting on a specific event in a specific work location.

| Event | Responsibility |
|---------------------------|----------------|
| Missoula area event | Jeff Harriott |
| HQ – power failure | Ben Schmidt |
| HQ – facility unavailable | Jeff Harriott |
| HQ – facility disaster | Jeff Harriott |
| Internet failure | Tim Rich |
| Telephone failure | Tim Rich |
| HQ DC event | Tim Rich |
| HQ DC disaster | Tim Rich |
| ByteGrid DC event | Tim Rich |
| ByteGrid DC disaster | Tim Rich |

3.4 External Contacts

This section lists key external resources that may be needed in the event of a business interruption.

| Name | Telephone | Role |
|-----------------|--|------------------------------|
| Utility company | 1-888-467-2669, opt 1, then opt 2 | |
| XO | Support: (800) 421-3872 | Support 24/7/365 |
| XO | (949) 417-7513 –O (714) 640-4852 –C | Jack Lewis – Account manager |
| Blackfoot | (855) 556-1777 | Support |

| | | |
|---|---|---|
| Blackfoot | (406) 541-5239 | Wendy Compton – Account manager |
| Centurylink | (866) 346-7877 | Jeff Woolston – Sr. Commercial Account Manager |
| Centurylink | (800) 524-5249 | 24/7 Support (MPLS, Fiber, DS1) |
| Comcast | (877) 747-3669 | Support/Account management |
| UPS Technical Support Service | (773) 869-1234 | 24/7/365 **For physical maintenance, use Facilities Gateway. |
| Generator Support TWEnterprises, INC | (800) 955-3795 | 636 Logan Ln, Billings, MT 59105 |
| Generator Support TWEnterprises, INC | (406) 697-6335 | Luke Larson – technician |
| HVAC support | (406) 728-1515 | 4G Plumbing and Heating Inc. 5641 W Harrier, Missoula, MT 59808 |
| Fax Services Esker on Demand | (800) 368-5283 www.esker.com (support link there) | |
| Electrician | Rattlesnake Electric 1201 S 6th Street West #102, Missoula, MT 59801 | Jim Pelger (owner/operator) Rattlesnakeelectric@yahoo.com Office: (406) 721-5484 Cell: 829-5891 |
| Plumber | Plumb-Tech Plumbing and Heating, LLC 6290 Saint Thomas Drive Missoula, MT 59803 | Lance (owner/operator) Plumbtechplumbingandheating.com |

| | | |
|-----------------------|--|---|
| | | Office: (406) 251-3555 Cell: (406) 546-5077 |
| Cisco | www.cisco.com (support via Vox Networks as primary) | Hardware/Software support (24/7) |
| Dell | www.support.dell.com (chat and drivers) (800) 945-3355 | Server Hardware Support (per device) 24/7 |
| Dell Software | www.support.software.dell.com/appassure logon and create ticket. Set priority and if it's emergency, they return call within 4 hours. | AppAssure support 5/12 Software, 24/7 emergency |
| Dell SecureWorks | (888) 456-3210 (web portal for ticket management) | SecureWorks support 24/7 |
| Dell | (512) 513-8714 Matt.Parravano@Dell.com | Matt Parravano – Account manager. |
| Zix Encryption | https://support.zixcorp.com (888) 576-4949 | Hardware and software support 24/7 emergency support |
| CDW | (312) 547-2337 Kylehan@cdw.com | Kyle Hanson – Account Manager |
| VOX Network Solutions | (877) 423-7486 https://system.netsuite.com/app/login/secure/privatelogin?c=621080 service@voxns.com (877) 869-8111 | 24/7 Support |
| VOX Network Solutions | mslye@voxns.com 206-519-5386 -O (206) 650-0962-C | Matt Slye – Account Manager |
| ByteGrid | support@bytegrid.com (425) 741-7014 | 24/7 support and remote hands |
| ByteGrid | psteliga@bytegrid.com (425) 741-7014 – Office (206) 450-9668– Cell | Patrick Steliga – Account Manager |
| Microsoft Support | Premier Support Troy Charlston – TAM | Through Dell/Microsoft |

| | | |
|--|---|---|
| | (701) 281-3723 trchar@microsoft.com https://premier.microsoft.com/ - support website (800)-936-3100 – Technical Support | |
| Wadeware (Exchange, MS VPN, Skype for Business) | http://www.wadeware.net (425) 828-7772 or (206) 550-6216 | Bill Wade – Account Manager |
| SQL HA | Max Myrick mmyrick@sqlha.com (425) 466-5268 | Max Myrick |
| Altriva CRM (Microsoft) | (425) 605-9546 http://www.altriva.com | ayetter@altriva.com Arron Yetter – Account manager |

3.5 Critical Equipment

This section lists critical equipment that is vital to sustaining business operations. For each item, backup equipment is listed: For Missoula, certain equipment is physically located in the Lynnwood, Washington data center, but included here since it supports Missoula-based activities.

| Item | Purpose | Backup |
|--|---|--|
| Firewall HA Pair (HQ) | Redundant connections for corporate office | HA Pair Support 7/24/365 VOX and Cisco TAC |
| Firewall HA Pair (DC) | Redundant connections provided by ByteGrid DC | HA Pair Support 7/24/365 VOX and Cisco TAC |
| Core Switch Stack (HQ) | Provides HA end-points for internet connections, HA Firewalls, Edge Routers, and HA stacks in each floors' access switch stacks | Switch Stack has built-in failover Support 7/24/365 VOX and Cisco TAC |
| Access Switch Stacks (one each floor) (HQ) | Power and connections are redundant. | Switch Stack has built-in failover Support 7/24/365 VOX and Cisco TAC |

| Item | Purpose | Backup |
|---|---|--|
| Edge Switch Stack (DC) | Provide HA and F/O for Bytegrid redundant connections to HA services/hardware | Switch Stack has built-in failover Support 7/24/365 VOX and Cisco TAC |
| Core Switch Stack (DC) | Provides HA connections for firewalls, edge routers, and servers | Switch Stack has built-in failover Support 7/24/7 VOX and Cisco TAC |
| iSCSI Switch Stack | Provides HA access to SAN and iSCSI clients | Switch Stack has built-in failover Support 7/24/365 DELL |
| IDS: MSOISensor01 | Intrusion detection | 4 hour service from Dell. 24/7/365 active monitoring and built-in fail-over |
| IDS: LynISensor01 | Intrusion detection | 4 hour service from Dell. 24/7/365 active monitoring and built-in fail-over |
| Edge Router pair (HQ) | Connect multiple sites via DMVPN in HA setup, and provide access controls for internal traffic outbound | Failover pair for HA. |
| Edge Router pair (DC) | Connect multiple sites via DMVPN in HA setup, and provide access controls for internal traffic outbound | Failover pair for HA |
| Spam Filter Virtual server Barracuda | Spam Filter | 24/7/365 24 hour support |
| Email Encryption Zix Encryption Platform | Filter mail and force encryption when mail certain criterion are met. | Encrypted email is queued at Zix site. 24/7/365 support |
| SQL Cluster | SQL Services | Cluster is Failover Cluster AppAssure and SQL Software backup 24/7/365 6 hour support (Dell) |
| HyperV Platform (9 servers) DC | HyperV Hypervisor for Virtual Server support | Appassure for backups: planned F/O methodologies. |

| Item | Purpose | Backup |
|--|--|---|
| | | Support: Microsoft Premier (Hypervisor platform) DELL (Hardware platform) RapidRecovery (Software platform – backups) |
| RDP Cluster | Solomon, IT Services, Office, Sugar CRM, Docuware, UTEX access | Load Balanced cluster |
| KEMP services cluster (DC) | Load Balancing for RDP, Skype, Email | F/O cluster |
| Exchange Services cluster (DC) | Email and voicemail services | Cluster: Load balanced and F/O |
| SONUS HA Pair (DC) | SIP Gateway | Redundant pair Support 7/24/365 Sonus/Wadeware |
| Skype For Business Cluster Platform (DC) | Lync Voice services | HA Cluster w/DR in HQ 24/7/365 4 hour support (platform Dell) 7/24/365 Microsoft Premier Wadeware consultants – engineering and support |
| Cisco Voice Cluster (HQ) | Cisco Voice services (deprecated). | F/O Cluster VOX - Cisco 24/7/365 4 hour support |
| MSO-VMWare01 | Legacy apps (deprecated) | Server decommissioning and deprecation 24/7/365 6 hour support |
| UPS (HQ) | Battery backup and generator automatically switch-over support for Data Center and each floors' wiring closet. | Equipment is redundant and monitored. |
| Generator | Diesel generator is backup power for utility power | This is the backup. 24/7 support |
| HVAC – Data room – HQ | Cooling/Humidity control for data center | Automatic failover to utilize building AC via forced ventilation. (24/7 monitoring) |

| Item | Purpose | Backup |
|---------------------------------|----------|--|
| Power/Electricity/Internet (DC) | Bytegrid | DR site at HQ 24/7/365 monitoring and on-site activities. |

3.6 Contingency Location

Missoula contingency locations occur at two levels:

- For an outage of less than 24 hours

Operations staff will work out of home office location.

- For a multiple building outage of more than 24 hours

Operations will be consolidated at the Holiday Inn, 200 South Pattee, Missoula, MT 59802, (406) 721-8550. Transition time for such a relocation is 24 hours.

3.7 Data Center Contingency

Consumer Direct data center services are deployed at two locations: Lynnwood, WA and Missoula, MT. Each data center is a failover site for the other.

1. Primary data center:

ByteGrid Data Center

4200 194th Street SW Lynnwood, WA 98036

Tel : (425) 741-7014

Fax : (425) 967-0077

Services: Email, database, virtual server infrastructure, line-of-business applications

2. Secondary data center:

Consumer Direct Management Solutions

100 Consumer Direct Way Suite 200, Missoula, MT 59808

Services: File Storage, Archives, DR for database, virtual server infrastructure, line-of-business applications, voice, email.

3.8 Staffing Contingency – Data Center services

| Person | Location | Equipment |
|----------------|---|---|
| Tim Rich | Primary location: Lind, WA. 4 hour travel to Missoula if required. 4 hour travel to Lynwood data center if required. Backup location: Spokane, WA Cerium office, Spokane XO office, Lynwood WA. Bytegrid facility. | Laptop, misc. tools for cabling and server work if needed. Cell phone for hotspot. |
| Chris Port | Primary Location: Billings, MT. 5 hour travel to Missoula if needed. Flight to Lynwood if needed. Backup location: Home | Laptop, misc. tools for cabling and server work if needed. Cell phone. |
| Bill Gilbert | Primary Location: HQ office in Missoula, MT. Backup Missoula location on this plan 2.6 | Laptop, misc. tools for cabling and server work if needed. Cell phone |
| Arthur Sikkink | Primary Location: HQ office in Missoula, MT. Backup Missoula location on this plan 2.6 | Laptop, misc. tools for cabling and server work if needed. Cell phone |

3.9 Testing

The following testing activities occur:

- Software backups tested bi-weekly.
- UPS and Generator are on a full-load test run each week.
- Internet connections are monitored internally and externally. External monitoring creates call-tree events for outages.
- The Business Continuity Plan will be tested once yearly.

3.10 Site Data Matrix

The site data matrix for CDMS/Missoula is presented for three dimensions in **Appendix A:**

1. Current Provision – information on current state for the services listed below.

2. Temporary Outage - information on failover approach for the services listed below, for a temporary outage (less than 24 hours).
3. Extended Outage - information on failover approach for the services listed below, for an extended outage (greater than 24 hours).

The site data matrix provides information for the following services:

- A. Office location
- B. Telecommunications carrier data
- C. Internet carrier data
- D. Telephone numbers
- E. Internal data network
- F. Telephone numbers
- G. Emergency telephone number
- H. Printer service
- I. Fax service

4 Consumer Direct Colorado

This section provides information for the Consumer Direct Colorado (CDCO) company. One site is covered for CDCO, that being the Denver, CO office.

4.1 Call Plan

The following table lists resources available to assist in the event of a business interruption. Calls should start at Level 0 and proceed to subsequent levels if the contact is not available.

For emergencies, dial 911

For all outages over 24 hours:

Consumer Direct Contact

Tim Rich

Consumer Direct Management Solutions

Phone: (406) 370-2049

E-mail: timr@consumerdirectonline.net

Colorado Department of Health Care Policy and Financing

Mallory Cyr

Colorado Department of Health Care Policy and Financing

Phone: 303-866-6491

E-mail: Mallory.Cyr@state.co.us

| Colorado Office Event Call Plan | | | |
|---------------------------------|------------------------|-------------------|--|
| Local Office | | | |
| Level | | | |
| 0 | Reception | Sherri Kastens | sherrik@consumerdirectcare.com O: 844-381-4433 ext. 6502 |
| 1 | Manager | Kady Hetherington | kadyh@consumerdirectcare.com O: 303-325-7173 C: 303-532-9240 |
| 2 | Manager Back-Up | Kari Vinopal | kariv@consumerdirectcare.com O: 715-220-4361 C: 715-441-0784 |

| Colorado Office Event Call Plan | | | |
|---------------------------------|-----------------------------|-----------------|--|
| Local Office | | | |
| Level | | | |
| Central Office | | | |
| 7 | Main Office | Reception | O: 406-532-1900 |
| 8 | Help Desk | Main | ithelpdesk@consumerdirectcare.com O: 406-532-1940 |
| 9 | | Tyler Mickelson | tylerm@consumerdirectcare.com O: 406-532-2951 C: 406-493-2860 |
| 10 | Engineering | Tim Rich | timr@consumerdirectcare.com O: 406-532-2003 C: 406-370-2049 |
| 11 | | Chris Port | chrisp@consumerdirectcare.com O: 406-532-1902 C: 406-672-0159 |
| 12 | Executive Management | Jeff Harriott | jeffh@consumerdirectcare.com O: 406-532-1979 C: 406-830-4562 |
| 13 | | Beth Peterson | bethp@consumerdirectcare.com O: 406-532-7605 |
| | | | |

4.2 Key Personnel

The following chart lists key personnel in the Denver area. These staff are referred to in the Event/Responsibility Matrix in the subsequent section of this Plan.

| Role | Name | Telephone | Alias | Backup |
|-----------------|-------------------|---------------------------|--------|---------------|
| Program Manager | Kady Hetherington | 505-344-8182 ext. 2995 | Kadyh | Kari Vinopal |
| CFO | Daryl Holzer | 406-532-2920 | Darylh | Jeff Harriott |
| COO | Beth Peterson | 406-532-7605 | Bethp | Jeff Harriott |
| CIO | Jeff Harriott | 406-532-1979 | Jeffh | Tim Rich |

4.3 Event/Responsibility Matrix

This section defines the primary party responsible for acting on a specific event in a specific work location.

| Event | Responsibility |
|-----------------------------|-------------------|
| Denver area event | Kady Hetherington |
| CDCO office – power failure | Kady Hetherington |

| | |
|------------------------------------|-------------------|
| CDCO office – facility unavailable | Kady Hetherington |
| CDCO office – facility disaster | Kady Hetherington |
| Internet failure | Tim Rich |
| Telephone failure | Tim Rich |

4.4 External Contacts

This section lists key external resources that may be needed in the event of a business interruption.

| Name | Telephone | Role |
|--|---|--|
| XO | Support: (800) 421-3872 | Support 24/7/365 |
| XO | Direct: (509) 444-6983 Cell: (509) 435-1788 | Account Manager |
| Facilities personnel | 5990 Greenwood Plaza Blvd Bldg 2, Suite 205 Greenwood Village, CO 80111 (303) 290-0020 | Cat Paz – Property Administrator GCPADMIN@SKBCOS.COM |
| Applied Telephone Technology (local network VAR) | (303) 935-0099 | Steve Butler Ray Johnson |
| Power company | Xcel Energy | 1-800-895-1999 |

4.5 Critical Equipment

This section lists critical equipment that is vital to sustaining business operations. For each item, backup equipment is listed:

| Item | Purpose | Backup |
|---------|--------------------------------------|--|
| Laptops | End user access to CDMS resources | Ship Spare/replacement: Web mail for email and Lync and CRM from the outside |

| | | |
|---|--|---|
| Desktop | Front desk shared end user access. | Laptops |
| Telecommunications Cisco 294x | Front desk phone. | Forward to another number and ship new one. |
| Telecommunications Cisco 1921 Router | Connect internal network to external resources and inter-connect with CDMS secure network for internal CDMS resources (Phones, CRM, etc) | Ship Spare (Hotspot until replaced) |
| Telecommunications Cisco 2960 Switch | Connect internal devices to the local network and the local network to the CDMS router(above) | Ship Spare (hotspot until replaced) |
| Telecommunications Tripplite UPS | Provide un-interrupted power to the network devices above and to XO's router. | Bypass until repaired |
| Printers | Provide print, scan, and fax services (fax via Esker) | |

4.6 Contingency Location

Denver contingency locations occur at two levels:

- For an outage of less than 24 hours
 - Operations staff will work out of home office location.
- For an outage of more than 24 hours
 - Operations will be consolidated at the Denver Marriott Tech Center, 4900 S. Syracuse Street, Denver, CO 80237, (303) 779-1100.

4.7 Staffing

Denver contingency staffing actions occur at two levels:

- For an outage of less than 24 hours
No staffing actions will be taken.
- For an outage of more than 24 hours

Staff from the CDMS offices in Missoula, MT will support CDCO operations until routine operations are restored.

4.8 Site Data Matrix

The site data matrix for CDCO is presented for three dimensions in **Appendix B**:

1. Current Provision – information on current state for the services listed below.
2. Temporary Outage – information on failover approach for the services listed below, for a temporary outage (less than 24 hours).
3. Extended Outage – information on failover approach for the services listed below, for an extended outage (greater than 24 hours).

The site data matrix provides information for the following services:

- A. Office location
- B. Telecommunications carrier data
- C. Internet carrier data
- D. Telephone numbers
- E. Internal data network
- F. Telephone numbers
- G. Emergency telephone number
- H. Printer service
- I. Fax service

5 Appendix A – Site Data Matrix CDMS

| Program: Consumer Direct Management Solutions Office: HQ Data for: HQ operations; Disaster Recovery data center | | | |
|---|---|--|------------------|
| Current Provision | | <i>Notes</i> | <i>Reference</i> |
| 1. Office | Address 100 Consumer Direct Way Missoula, MT 59808 Landlord CDMS Access Card/PIN | | |
| 2. Telecommunications | XO(eSIP)(DR/BC) Telecommunications via Lynnwood Data Center | | |
| 3. Internet | Blackfoot (350 MB Fiber) CenturyLink (300 MB Fiber) | Circuits from each provider exit property and area of town via different paths | |
| 4. Internal network | Connected to CDMS domain: Nightingale via CDCN | Connectivity to remote sites via redundant connections. | |
| 5. Telephone | (406) 532-1900 | Office PBX/Phone service is on CDMS Lync infrastructure. | |

| Program: Consumer Direct Management Solutions Office: HQ Data for: HQ operations; Disaster Recovery data center | | | |
|---|--------------------------|-----------------------------------|-----------|
| Current Provision | | Notes | Reference |
| 6. Emergency telephone | (406) 532-1900 | | |
| 7. Printers | Sharp printers (via OS2) | Multiple printers at this office. | |
| 8. Fax | Via Esker. | Esker service. | |

0

6 Appendix B – Site Data Matrix CDCO

| Program: Consumer Direct Colorado(CDCO) | | Office: Denver, Colorado | Data for: Local office | |
|--|---|------------------------------------|-------------------------------|-----------|
| Current Provision | | Notes | | Reference |
| ○ Office | Address 7951 East Maplewood, Suite 125 Denver, Colorado 80111 Landlord Cat Paz – Property Administrator Access Via common access | | | |
| ○ Telecommunications | XO Communications Jack Lewis, Account Manager 1330 N. Washington Spokane, Washington 99201 | Delivered on Century Link circuit | | |
| ○ Internet | XO Communications Jack Lewis, Account Manager 1330 N. Washington Spokane, Washington 99201 | Delivered on Century Link circuit. | | |
| ○ Internal network | Connected to CDMS domain: Nightingale | | | |

| Program: Consumer Direct Colorado(CDCO) | | Office: Denver, Colorado | Data for: Local office | |
|--|----------------|--|-------------------------------|-----------|
| Current Provision | | Notes | | Reference |
| ○ Telephone | (844) 381-4433 | Office PBX/Phone service is on CDMS Lync infrastructure. | | |
| ○ Emergency telephone | (844) 381-4433 | Answered by Call Center | | |
| ○ Printer | Sharp | | | |
| ○ Fax | Esker | | | |

| | | | |
|---|---|---------------------------|-------------------------------|
| Program: Consumer Direct Colorado (CDCO) | | Office: Denver, CO | Data for: Local office |
| Temporary Outage – under 24 hours | | Notes | Reference |
| 1. Office | Home office | | |
| 2. Telecommunications | Home phone or cell phone | | |
| 3. Internet | Cell phone hot spot | Via company-owned phone | |
| 4. Internal network | Access via CDMS Virtual Private Network (VPN) | | |
| 5. Telephone | Home phone or cell phone | | |
| 6. Emergency telephone | (844) 381-4433 | | |
| 7. Printer | Home printer, or FedEx Ship Center 47795 E. Bellview Englewood, CO (303) 771-0302 | 2.1 miles from office | |
| 8. Fax | (866) 924-9072 | Esler service. | |

| | | | |
|---|---|---|-------------------------------|
| Program: Consumer Direct Colorado (CDCO) | | Office: Denver, CO | Data for: Local office |
| Temporary Outage – under 24 hours | | Notes | Reference |
| Program: Consumer Direct Colorado (CDCO) | | Office: Denver, CO | Data for: Local office |
| Extended Outage – Over 24 hours | | Notes | Reference |
| 1. Office | Denver Marriott Tech Center 4900 S. Syracuse Street Denver, CO 80237 (303) 779-1100 | 2.6 miles from office | |
| 2. Telecommunications | Hotel internet or cell phone | For hotel internet, connect via VPN and use Lync voice for internal and external calls. | |
| 3. Internet | Hotel internet or cell phone hot spot | | |
| 4. Internal network | Access via CDMS Virtual Private Network (VPN) | | |
| 5. Telephone | (844) 381-4433 | | |
| 6. Emergency telephone | (844) 381-4433 | | |
| 7. Printer | FedEx Ship Center | 2.1 miles from office | |

| Program: Consumer Direct Colorado (CDCO) | | Office: Denver, CO | Data for: Local office | |
|---|---|---------------------------|-------------------------------|------------------|
| Temporary Outage – under 24 hours | | <i>Notes</i> | | <i>Reference</i> |
| | 47795 E. Belleview Englewood, CO (303) 771-0302 | | | |
| 8. Fax | (866) 924-9072 | Esker service. | | |



Appendix D: Sample Partial Member Enrollment Packet



Services My Way

PARTICIPANT ENROLLMENT CHECKLIST

| | |
|------------------|--|
| Participant Name | Authorized Representative Name (if applicable) |
|------------------|--|

Welcome to Consumer Direct!

Please complete the forms in the lists below, including this one. All forms need to be completed, except in some situations when labeled "if applicable". Check off each item below as it is completed. If you would like a paper copy of these forms, please let us know and we will return copies to you.

Consumer Direct and tax forms required to enroll in the Services My Way program:

1. ☐ Participant Enrollment Checklist (this form)
2. ☐ Participant Data Form
3. ☐ Participant Agreement & Acknowledgement
4. ☐ SS-4 Application for Employer Identification Number (EIN)
5. ☐ 2678 Employer/Payer Appointment of Agent
6. ☐ FR 500 Combined Business Registration
7. ☐ D-2848 Power of Attorney and Declaration of Representative
8. ☐ OUCTAX-1 Power of Attorney
9. ☐ Maryland Form CRA – Combined Registration Application
10. ☐ Maryland Form 548 Power of Attorney
11. ☐ Virginia Form R-1 Business Registration
12. ☐ Virginia Form PAR 101 Power of Attorney and Declaration of Representative

Department of Health Care Finance, Long-Term Care Administration forms required to enroll in the Services My Way program:

1. ☐ Participant Consent Form
2. ☐ Participant/Representative-Employer Agreement
3. ☐ Authorized Representative Designation Form (if applicable)
4. ☐ Natural Supports/Unpaid Emergency Back-up Designation Form
5. ☐ Fraud and Abuse Statement
6. ☐ Remediation, Training & Termination Process

Supplemental Forms (Discuss each and keep for future use)

- DHCF Participant Guide book - Individual Directed Goods & Services Allowable & Non-allowable List, Remediation, Training & Termination Process, Justification to Budget Modification
- Bi-Weekly Progress Notes
- Payroll Calendar, Status Change, Paper Timesheet

I have reviewed and verified the above forms for completeness and all forms are readable.

Participant/Authorized Representative Signature

Date

Consumer Direct Representative Signature

Date



Services My Way

PARTICIPANT DATA FORM

Participant Information

Name on Social Security Card _____
First Middle Last

Name in Payer Program

| First | Middle | Last |
|-------|--------|------|
| | | |

Street Address _____ (Physical address where services will be provided, No PO Box)

City Washington State DC Zip

Phone (_____)_____
Home

(_____)_____
Cell

(_____)_____
Fax

Email _____

Gender ☐ Male ☐ Female Date of Birth

Social Security # _____ Medicaid # _____

Authorized Representative Information (if applicable)

Name _____
 First *Middle* *Last*

Street Address _____

City _____ State _____ Zip _____

Phone () _____
Home Cell Fax **Email** _____

Relationship to Participant _____

Common Law Employer Information (Person who will file for and hold the Federal Employer Identification Number (FEIN))

Relationship to Participant ☐ Participant (self) ☐ Authorized Representative ☐ Other

Name _____
First Middle Last

Street Address _____

City _____ State _____ Zip _____

Phone (____) _____ (____) _____ (____) _____ Email _____
Home Cell Fax

Date of Birth _____ **Social Security #** _____

Prior Relationships/Business Accounts

1. ☐ Yes ☐ No – Has Participant ever received services through another Fiscal Provider? If yes, Provider name: _____

2. ☐ Yes ☐ No – Is Participant switching FEIN holders? If yes, previous FEIN holder name: _____

3. ☐ Yes ☐ No – Are Prior Business Accounts established? If yes, enter account information below:

| FEIN | DC Business Tax Withholding Acct # | DC Unemployment Tax Acct # | DC Unemployment Rate |
|------|------------------------------------|----------------------------|----------------------|
|------|------------------------------------|----------------------------|----------------------|

→ ☐ Yes ☐ No – **If previous FEIN**, does FEIN holder have employees other than PDWs?

4. ☐ Yes ☐ No -- Will a Guardian sign enclosed Federal, State and DC tax forms on the Common Law Employer's behalf?
If yes, enter Guardian name and phone # below and attach court-appointed guardianship paperwork.

→ **Guardian Name** _____ *First* _____ *(MI)* _____ *Last* _____ **Phone** _____

5. Budget/Auth Start Date or Reactivation Start Date _____



Enrollment Questions

The Consumer Direct representative responsible for assisting the Participant with enrollment must complete the questions below by interviewing the Participant and/or FEIN holder. If Participant/FEIN holder does not know the answer to a question, please write "participant doesn't know" on the line next to the question.

Questions for the FEIN holder named on page 1 of this form.

1. What name is shown on your most recently received Social Security Card?

2. What number is shown on your most recently received Social Security Card?

3. Have you gone by any other name(s) in the past which aren't shown on your most recently received Social Security Card?
☐ Yes ☐ No
 - a. If yes, please list your other name(s): _____
 - b. Please list when your other name(s) were used: _____
4. Were you ever previously assigned an FEIN by the IRS for any business previously operated/owned?
☐ Yes ☐ No
 - a. If yes and known:
 - i. Please list the previously assigned FEIN: _____
 - ii. What was the business for? _____
 - iii. Is the business still active? ☐ Yes ☐ No

Question for the Participant named on page 1 of this form.

1. Were you ever previously enrolled with another Fiscal Agent/Provider?
☐ Yes ☐ No
 - a. If yes and known:
 - i. Please list the name of the Fiscal Agent/Provider: _____
 - ii. Please list when you were with the Fiscal Agent/Provider: _____

Consumer Direct Representative Name: _____

Consumer Direct Representative Signature: _____ Date: _____





Services My Way
**PARTICIPANT AGREEMENT
AND ACKNOWLEDGEMENT**

| | |
|------------------|--|
| | |
| Participant Name | Authorized Representative Name (if applicable) |

Instructions: Review each topic below and ask questions, if necessary. Please initial by each to show your (Participant or Authorized Representative) agreement and understanding. In this agreement, "I, my, me" refers to the Participant and/or Representative, as appropriate.

_____ I authorize Consumer Direct to Initial for me ONLY because it is difficult for me to write

_____ **RECEIPT OF CONSUMER DIRECT EMPLOYER HANDBOOK:** The Handbook describes policies, procedures, and requirements for participants and participant-directed workers (PDW) in the *Services My Way* program. I will read the Handbook. If I have questions, I will contact Consumer Direct. I will review the Handbook with my PDW(s) and show them where to find it on Consumer Direct's website. I am responsible for making sure my PDW(s) follow program requirements, policies, and procedures contained in the Handbook.

_____ **OTHER TRAINING MATERIALS:** I have received and will read the following training materials:

- *Services My Way* Participant Guidebook
- Abuse, Neglect and Exploitation (Handbook Supplement)
- Medicaid Fraud (Handbook Supplement)
- Employer-related training; completing federal and state tax documents and completing and submitting time sheets.

_____ **HIRING PARTICIPANT-DIRECTED WORKER(S):** I am responsible for recruiting, interviewing and hiring PDW(s). The PDW can be a family member, friend, or someone from the community. I must be comfortable with the person.

- PDW(s) cannot be a participant's representative.
- PDW(s) cannot be a legally responsible individual (spouse, parent working for minor child or designated legal guardian.)
- Before a PDW can begin to work and be paid in this program, I must receive a completed "Okay to Work" from Consumer Direct for each PDW.

_____ **CERTIFYING PARTICIPANT-DIRECTED WORKER(S):** I am responsible for completing a Participant-directed Worker Competency Certification Statement for each PDW I hire. I know Consumer Direct must receive the completed Statement within 21 days of a PDW's hire date or the PDW must stop working for me.

_____ **PARTICIPANT TRAINING PLAN:** I am responsible for training and supervising my PDW(s). I can get information about how to do this in the *Services My Way* Participant Guidebook. I also can get information from Consumer Direct staff members who meet with me. I know that Consumer Direct will answer questions, clarify issues, and assist me in learning to supervise and manage my



PDW(s).

- a. I will train and schedule PDW(s) to meet my service needs. The PDW will be scheduled as approved on my *Services My Way* budget plan.
- b. I will give my PDW(s) feedback if he or she is not doing a task as I trained him or her or is not doing a good job. I also will give the PDW positive feedback when he or she is doing tasks well.
- c. I will terminate a PDW if he or she continues to do a poor job after receiving feedback and training or if he or she has not followed the guidelines of the program.
- d. I know that I am responsible for training my PDW(s) on my person-centered plan and specific needs. I have received the following PDW training information:
 - Infection Control
 - Abuse and Neglect
 - Medicaid Fraud
 - Lifting and Moving Patients
 - HIPAA and Confidentiality
- e. I know that Consumer Direct will help me make sure my PDW(s) are approved to work.

APPROVING TIME WORKED: I will make sure that the services I schedule the PDW to perform and the time the PDW works agree with the *Services My Way* budget plan. I know that approving time when a PDW has not worked, or approving time that does not agree with the *Services My Way* budget plan, is Medicaid fraud.

- I can begin services with Consumer Direct after my *Services My Way* budget plan has been approved by DHCF, and my participant enrollment materials and my PDW(s) enrollment materials are forwarded to Consumer Direct and I receive a "Launch Date"; I will also receive an "Okay to Work" form for each PDW.
- As a part of my person-centered plan, I will design an emergency back-up plan to use when my regularly scheduled PDW(s) and services are not available.
- I know that I am financially responsible for payment to my PDW(s) if:
 - I do not qualify or lose my Medicaid;
 - I allow my PDW(s) to work more time than is approved on my *Services My Way* budget plan;
 - I allow my PDW(s) to do tasks that are not approved on my *Services My Way* budget plan.

REPORTING: I will report:

- a. Any possible Medicaid fraud to Consumer Direct and the DHCF immediately.
- b. Abuse, neglect and exploitation (described in the *Services My Way* Participant Guidebook) to Adult Protective Services, Consumer Direct, and the DHCF.
- c. Any change in health status or living situation to Consumer Direct and my case manager (examples: hospitalization, improvement or decline in health status, or change of address) within five (5) days.
- d. A change in my or my representative's name or address within five (5) days to Consumer Direct.





Services My Way
**PARTICIPANT AGREEMENT
AND ACKNOWLEDGEMENT**

PRIVACY: I have received a copy of Consumer Direct's Notice of Privacy Practices. It describes my rights and privileges under Consumer Direct's privacy rules. The rules follow federal privacy regulations (HIPAA). Consumer Direct's Privacy Officer can be reached toll-free at 1-888-532-1907.

DECISION TO SERVE: Consumer Direct can choose to not serve me. This will happen if I do not follow policies and procedures or if my health and safety needs cannot be met with the self-directed program. As a part of the Remediation, Training, and Termination process, Consumer Direct will discuss their concerns with me, the *Services My Way* Program Coordinator, and my case manager. If necessary, my case manager will assist me with transitioning services out of the *Services My Way* program within thirty (30) days.

AGREEMENT TERMS AND CONDITIONS

- A. **Term and Termination:** This Agreement will be effective as of the signature date noted on the last page of the Agreement and will continue until terminated. Both Consumer Direct and Participant/Representative-Employer have the right to terminate this Agreement at any time. Consumer Direct reserves the right to terminate services with 30-days' notice when circumstances are deemed unsafe for Consumer Direct staff, participant(s), worker(s), or for any other reason as determined by Consumer Direct in its sole discretion. If the Consumer Direct terminates this agreement, Consumer Direct will notify Participant by email or by regular US mail.
- B. **Term of Prohibition on Staff Solicitation:** During the term of service with Consumer Direct, and for a period of 180 days after termination of services with Consumer Direct, Participant/Representative-Employer will not hire or otherwise utilize services of any person previously provided by Consumer Direct, except through a contract with Consumer Direct. If Participant/Representative-Employer does so, Participant/Representative-Employer will pay Consumer Direct upon demand, as liquidated damages, the sum of \$2,500.00 or 20% of the annualized salary (whichever is greater) for each Consumer Direct employee so hired or utilized.
- C. **Partial Invalidity:** If any portion of this Agreement does not apply to Participant/Representative-Employer, changes over time, or is determined to be illegal or invalid, that part of the Agreement shall be modified to the extent possible to give it its intended effect and/or meaning, and all remaining provisions of the Agreement shall continue in full force and effect.
- D. **Arbitration:** If Participant/Representative-Employer or Consumer Direct decide that they are unable to resolve a disagreement within thirty (30) days of notification to the other party regarding the dispute, Participant/Representative-Employer and Consumer Direct will choose someone from the American Arbitration Association together (known as an independent arbitrator) to work out the disagreement. The cost of the person chosen will be paid equally by both Participant/Representative-Employer and Consumer Direct. The decision of the arbitrator may be given to a judge in the event the decision is not accepted by either party.
- E. **Governing Law:** This Agreement shall in all respects be construed in accordance with and governed by the laws of the State on which your local office is situated, without regard to its conflict of laws rules. Participant/Representative-Employer and Consumer Direct agree that the courts in the Judicial District in which your primary State office sits shall have exclusive jurisdiction with respect to any controversy or





Services My Way
**PARTICIPANT AGREEMENT
AND ACKNOWLEDGEMENT**

dispute arising out of or relating to this Agreement and not resolved pursuant to the terms of this Agreement.

- F. **Indemnification and Hold Harmless:** Participant/Representative-Employer and Consumer Direct (the "Indemnifying Party") agree to save and hold each other (the "Indemnified Party") harmless from and against, and will indemnify each other for, any liability, loss, cost, expense or damage whatsoever caused by reason of any injury sustained by any person or to property by reason of any act, neglect, default or omission of Indemnifying Party. If Indemnified Party is sued in court or compelled to arbitrate for damages by reason of any of the acts of Indemnifying Party, Indemnifying Party will defend said action on behalf of Indemnified Party. Alternatively, and with agreement of Indemnifying Party, Indemnified Party may defend the same and any expenses, including reasonable attorney's fees that Indemnified Party may pay or incur in defending said action and the amount of any judgment, award or settlement that Indemnified Party may be required to pay will be promptly reimbursed by Indemnifying Party upon demand.
- G. **Waiver of Terms and Conditions:** The failure of Participant/Representative-Employer or Consumer Direct in any one or more instances to enforce one or more of the terms and conditions of this Agreement or to exercise any of its rights or privileges, or the waiver of any breach of such terms or conditions, shall not be construed as thereafter waiving any such terms, conditions, rights or privileges, and the same shall continue and remain in force and effect as if no waiver had occurred.
- H. **Timely Notification:** The Participant/Representative-Employer and Consumer Direct agree that all contact must occur in a timely way. Any notice will be given immediately, so that neither Participant/Representative-Employer nor Consumer Direct is hurt by a delay.
- I. **Modification of Agreement:** Any changes to the terms of this Agreement must be in writing, signed and dated by Participant/Representative-Employer and Consumer Direct.
- J. **Privacy:** All activities related to this Agreement shall adhere to state and federal confidentiality laws and regulations; including, without limitation the Administrative Simplification provision of the Health Insurance Portability and Accountability Act ("HIPAA") and regulations promulgated thereunder, 45 C.F.R. Parts 160 – 164 (the "Regulations"), as amended.
- K. **Entire Agreement:** This Agreement constitutes the entire agreement between Participant/Representative-Employer and Consumer Direct and supersedes all prior oral and written statements. This Agreement may be modified, amended or changed only by a written document signed by both Participant/Representative-Employer and Consumer Direct. This Agreement shall not create any benefits, rights, privileges, remedies or claims for, in, by, or on behalf of any parties who are not signatories to this Agreement.

I am the direct (managing) employer of the PDW(s). I accept all responsibility for any personal injury, medical or related liability for services provided to me under this program. My signature indicates my agreement.

Participant/Representative-Employer Signature

Date

Consumer Direct Rep. Signature

Date

