



Online: PalcoFirst.com

June 5th, 2023

Crystal Hustead, Contracting Officer
Department of Health and Human Resources, Bureau for Medical Services
2019 Washington Street, East
Charleston, WV 25305-0130

Dear Ms. Hustead,

RE: Solicitation #CRFP-0511-BMS2300000003

We are excited to submit our response to the above-referenced Solicitation for F/EA Support to Self-Direction Members, issued March 30, 2023. Our response complies with all Solicitation-specified requirements, provisions, terms and conditions, and Amendments.

Palco, Inc. was the first company in the country to provide the services contemplated in the Solicitation. We specialize in state Medicaid self-direction programs and provide complete financial management and skills training solutions. Today, we provide F/EA and Resource Counseling to more than 10,000 clients in nine states.

Our mission is to empower independence through our partnerships. The agencies that we work with have consistently praised us for our professionalism, diligence, and integrity. We take an innovative approach to each program, ensuring that each run efficiently and cost effectively.

As requested, we have included one copy of the Technical Proposal, and one copy of the Price Proposal.

We are industry leaders and would love to bring our expertise to West Virginia. We look forward to working with you and serving the people of West Virginia. Please reach out to me if you have any questions regarding this proposal.

06/05/23 09:57:10 W Purchasing Division

Alicia Paladino, Esq., CPA Chief Executive Officer Alicia@Palcofirst.com

17300 Chenal Parkway, Suite 300

Little Rock, AR 72223

Phone: (501) 604-9936, ext. 1215

## ADDENDUM ACKNOWLEDGEMENT FORM SOLICITATION NO.: CRFP BMS2300000003

Instructions: Please acknowledge receipt of all addenda issued with this solicitation by completing this addendum acknowledgment form. Check the box next to each addendum received and sign below. Failure to acknowledge addenda may result in bid disqualification.

Acknowledgment: I hereby acknowledge receipt of the following addenda and have made the necessary revisions to my proposal, plans and/or specification, etc. Addendum Numbers Received: (Check the box next to each addendum received) Addendum No. 1 Addendum No. 6 Addendum No. 2 Addendum No. 7 Addendum No. 3 Addendum No. 8 X Addendum No. 4 Addendum No. 9 Addendum No. 5 Addendum No. 10 I understand that failure to confirm the receipt of addenda may be cause for rejection of this bid. I further understand that any verbal representation made or assumed to be made during any oral discussion held between Vendor's representatives and any state personnel is not binding. Only the information issued in writing and added to the specifications by an official addendum is binding. PALCO, INC Company Authorized Signature 6/1/2023 Date

NOTE: This addendum acknowledgement should be submitted with the bid to expedite document processing.

### REQUEST FOR PROPOSAL

### CRFP BMS2300000003

### Fiscal/Employer Agency Support to Self-Direction Members

Example:

Proposal 1 Cost is \$1,000,000 Proposal 2 Cost is \$1,100,000 Points Allocated to Cost Proposal is 300

Proposal 1: Step 1 - \$1,000,000 / \$1,000,000 = Cost Score Percentage of 1 (100%)Step  $2 - 1 \times 300 = \text{Total Cost Score of 300}$ 

Proposal 2: Step 1-\$1,000,000 / \$1,100,000 = Cost Score Percentage of 0.909091 (90.9091%)Step  $2-0.909091 \times 300 = \text{Total Cost Score of } 272.7273$ 

6.8. Availability of Information: Proposal submissions become public and are available for review immediately after opening pursuant to West Virginia Code §5A-3-11(h). All other information associated with the RFP, including but not limited to, technical scores and reasons for disqualification, will not be available until after the contract has been awarded pursuant to West Virginia Code of State Rules §148-1-6.3.d.

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.

PALCO, INC

(Company)

Alicia Paladino, CEO
(Representative Name, Title)

501.604.9936/501.821.0045
(Contact Phone/Fax Number)

6/1/2023
(Date)

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4.5.1.3     149,153       4.5.1.4     151       4.5.2     153	4.5.1.1.4	137	
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## **Technical Response**



#### **GOALS AND OBJECTIVES**

THE VENDOR SHOULD DESCRIBE ITS APPROACH AND METHODOLOGY TO PROVIDING THE SERVICE DESCRIBED BY MEETING THE GOALS/OBJECTIVES IDENTIFIED BELOW. VENDOR'S RESPONSE SHOULD INCLUDE ANY INFORMATION ABOUT HOW THE PROPOSED APPROACH IS SUPERIOR TO THE OTHER POSSIBLE APPROACHES.

**√**4.2.1.1

# Efficient & Cost-Effective F/EA FMS

Thank you for the opportunity to submit this response to Solicitation CRFP 0511-BMS2300000003. We are proud to introduce Palco's efficient and cost-effective solutions to support the West Virginia Department of Health and Human Services, Bureau for Medical Services (the "Agency") in delivering Government Subagent-Fiscal/Employer Agent (F/EA) Financial Management Services (FMS) and Resource Consulting (RC) to eligible West Virginians who choose to self-direct their Home and Community Based Services (HCBS) using the Agency's Personal Options Model. We are excited for the opportunity to serve members enrolled in the West Virginia Aged and Disabled Waiver (ADW), Intellectual/Developmental Disabilities Waiver (IDDW), Traumatic Brain Injury Waiver (TBIW), and the Take Me Home (TMH) / Money Follows the Person (MFP) program.

As you read this proposal, you will find that:

- ✓ Palco has 25 years of F/EA FMS experience. Our footprint spans across the United States, where we process half a billion dollars in participant-directed goods and services annually.
- ✓ Palco has 10 years of Resource Consulting experience founded on the principles of personcentered planning and self-determination philosophies for a diverse group of individuals.
- ✓ We focus on you. Your goals and objectives are important to us. We listen.

- ✓ We have the tools and infrastructure to support individuals and the program. We offer a best-in-class Case Management Portal (CMP) technology suite with end-to-end solutions from enrollment to paycheck.
- ✓ We meet or exceed all of the mandatory specifications required and have demonstrated in writing our ability to meet all specifications for the state of West Virginia.

Palco, Inc. was built out of a Certified Public Accounting firm and is still 100% CPA-owned today. When you hire Palco, you can rest assured that you are supported by a company who can handle the everchanging landscape of self-direction payroll and tax filings. Our staff wrote the book on F/EA practices for the industry while working with the nation's first Cash and Counseling self-directed program in the 1990s. Not only do we understand Internal Revenue Code §3504, IRS Rev. Proc. 2013-39, and complex Department of Labor regulations, but we have the skillset to analyze and apply these rules to your program.

When you partner with Palco, you gain a leadership team focused on the right things. Our leadership team is 100% CPA and privately owned. Our leadership ensures that you won't be competing with the agenda of a venture capitalist that many FMS vendors in the sector now have. Our focus is on meeting our clients' needs with quality. Our business practices and streamlined approach to program onboarding ensure that our system configurations will meet your needs on day one without expensive change orders and lengthy development times. We are disciplined in strictly monitoring both the local and national landscape to proactively account for changes to the service industry as well as federal, state, and local regulations. Palco will be a partner that West Virginia can count on for growing the self-directed program and bringing the highest quality approach to FMS services that stakeholders have ever seen

Palco's approach to Resource Consultant (RC) services is committed to giving every member the personalized and custom training and education necessary to help them succeed. With a communitybased team, you know that there is an RC assigned to each member. A local Palco RC can offer a connection and support to resource navigation and self-directed management that is unmatched.

Each individual is supported through our live-person Customer Support Center, filled with personcentered, trained, patient and kind, multilingual Palco employees. We are committed to no wait times, first call resolutions, and subject matter expert support at the end of every interaction.

Palco regularly collaborates with our Agency partners to identify solutions that benefit all users. This is best showcased by our Case Management Portal (CMP).

Palco's cloud-native and 24/7 accessible Case Management Portal serves as the repository for all program data and operations. This modern technology platform, built in house and designed for selfdirection, is the backbone of the Palco service delivery. It contains various modules for case management (records, member info), accounting (utilization, pay ledger/history, repository of pay rates and employer cost rates, exemptions, tax rates, workers' comp, budgets), billing, enrollment, time entry, and reporting.

The Portal was designed with an eye toward the user experience. We know that the key to running successful self-direction programs is providing 24/7, real-time information to members, workers, case managers, and Agency staff. Palco's CMP provides administrative transparency and immediate access to data, and the benefits are endless.

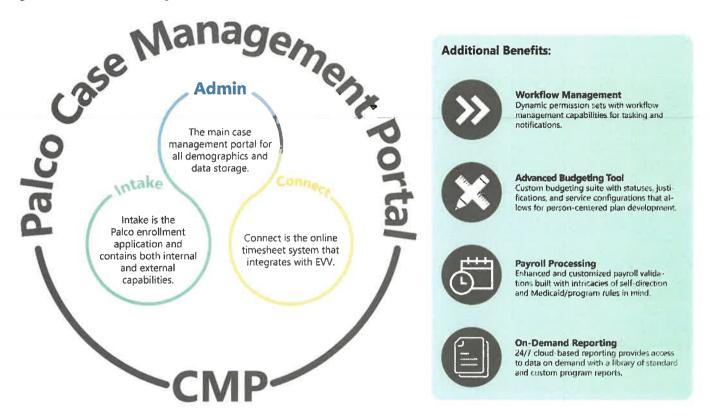
#### STATE/AGENCY BENEFITS

- Secure, 24/7 access to information at your fingertips.
- Dashboard views of trends and data.
- On-demand analysis and reporting.
- 21st Century Cures Act compliant EVV solution, built with self-direction in mind.
- Configurable modules for supporting service authorizations and billing claims management.
- ▼ Tailored access for Agency and case manager staff at all organizational levels, giving external. parties access to information necessary to best support the members efficiently and successfully.
- ✓ Proven success with integration to a variety of platforms, including MMIS, Managed Care. systems, and prior authorization/eligibility technologies, with the capacity for integration with future technologies, as required.
- Scalable to meet demands of any sized program.
- 100% compliance with federal and state regulations.

#### MEMBER/EMPLOYER OF RECORD, WORKER, AND VENDOR BENEFITS

- Enrolling member/representative-employers and direct care support workers (DCSWs) in under 3 minutes.
- ✓ Online time submissions with real-time error messages that allow users to fix mistakes instantly.
- Self-service tools and tracking.
- Visibility on budget utilization for employers.
- On-demand access to paystubs and forms, such as W-2s.
- Ability to update information without having to fax or mail forms.
- Online submission of vendor payments.
- Live chat with Palco agents.

Figure 1: Palco Case Management Portal



Through our modern approach to service delivery and technology, the Palco tools ensure that individuals receiving services are not administratively burdened and can focus on what matters most - having their health needs met.

Our conceptualization and creative, skillful implementation of technology means that we always accomplish contract outcomes. In every program we work with, we have collaborated with our partners and key program stakeholders to deliver effective Resource Consultant services, F/EA, Agency with Choice FMS, or F/EA subagent services that are both efficient and cost-effective. We have provided Financial Management Services for 25 years and Support Brokerage (Resource Consultant) services for over a decade. Today, we serve diverse populations, including aging Americans and individuals with ID/DD, across nine states. Our mission is to provide the best quality services and support to our 10,000 participants/members, 24,000 workers, 2,000 vendors, and 500 Personal Care Agencies.

Our demonstrated capabilities have impacted programs to run efficiently, cost-effectively, and to collaboratively dismantle technological impediments. We are most proud of that because it takes a team to create efficiency. It stems from collaboration, communication, great planning, and people working toward a common goal. We would appreciate the opportunity to bring our experience to West Virginia and show you how we can meet program objectives together.

### **√**4.2.1.2, 4.2.1.3, 4.2.1.5

## Policies & Procedures

Palco will provide and maintain a West Virginia-specific Organization Procedures Manual that documents all policies, procedures, and internal controls used to monitor the Subagent-F/EA FMS tasks and requirements outlined in this RFP. The manual will cover our understanding of the Subagent model and our commitment to being responsible for performing related tasks.

Our Policies and Procedures Manual is central to our service delivery to ensure services are provided in accordance with the principles and philosophy of self-direction. It includes a thorough understanding of Centers for Medicare & Medicaid Services (CMS), Internal Revenue Service (IRS), U.S. Citizenship and Immigration Services (US CIS), federal and state Department of Labor (DOL) and state and local tax requirements for Subagent F/EA FMS and domestic service workers, and West Virginia Provider Manuals, especially Chapter 600, and how Palco plans to meet those objectives. For each Subagent activity, our manual contains the following:

- Key activities and systems utilized to achieve Subagent-F/EA FMS deliverables.
- Associated target objectives, risks, and related quality indicators.
- Performance metrics to achieve key performance indicators.
- Internal controls for each activity.
- Monitoring tasks to measure indicators and metrics included in the Scope of Work.
- ✓ Communication plan to assure a continual feedback loop for quality assurance and improvement.

The manual will be submitted in a mutually agreed format to the Agency for review at least thirty (30) days prior to the project start date for review and approval. Once approved, Palco will update the manual as needed or at least annually and provide all updates to the State for review and approval. The manual will be available in electronic format for staff and Agency review at all times. All modifications will be implemented within ten (10) days.

The West Virginia F/EA FMS Policies and Procedures Manual will be updated as best practices come to light or to accommodate changes in the program, employment law, or tax codes. We understand Agency needs may change or state or federal regulations may cause adjustments within the program. We will alert the Agency in the event of any changes in these areas, offer solutions for complying with the changes, and accordingly document the solutions in our Policies and Procedures Manual. At minimum, we renew our manual annually. All personnel receive training on the F/EA FMS Policies and Procedures Manual as part of our initial onboarding protocols. The manual is available electronically for all staff to review as part of their daily activities. Please see Appendix 1 for a sample F/EA FMS Procedures Manual used and approved by other self-directed service programs.

### **√4.2.1.2.2-4.2.1.2.4**

# Readiness & Operational Reviews

We routinely complete Readiness Reviews in preparation for program operational start dates. If awarded this contract, Palco will welcome the opportunity to undergo a Subagent-F/EA FMS Readiness Review, and we will present the findings within thirty (30) calendar days of request. We will devote sufficient staff to the Readiness Review process, and we will make ourselves available in person or via conference call to meet with the Readiness Review Team at any time throughout the process.

Our diligence and preparedness will allow us to excel in each of the categories required in the RFP, including, but not limited to, the following:

- ✓ The ability to meet timeframes for preparing and distributing employer enrollment, worker employment, and vendor engagement packets.
- ✓ Technology necessary to meet all requirements of the RFP, including computer networks, billing systems integrated with MMIS, and prior authorization and referral tracking.
- ✓ Call center with the ability to meet the RFP terms.
- An effective and functioning website.
- ✓ A quality management system to monitor the requirements of the contract.
- ✓ Sufficient knowledge of the program and the Subagent-F/EA FMS model.
- Staffing levels are met, and staff has sufficient knowledge of Medicaid and F/EA laws, regulations, policies, and services to make enrollment, payroll, and invoice payment determinations.
- Production of training materials.
- ✓ Ability to verify Medicaid waiver eligibility, service authorizations, process enrollment requests for F/EA services, process timesheets and payroll for employees for authorized services, and accurately submit all required documentation.
- ✓ Testing of all EDI interfaces with the Department prior to implementation.

Additionally, we will participate in and welcome annual Subagent-F/EA FMS Ongoing Performance Reviews to help strengthen our operations and delivery to those we serve. If the Readiness Review or Ongoing Performance Reviews result in any findings that need corrective action, we will develop a plan to address and remedy the issues immediately, including a timeline for implementation. Any operational changes are immediately incorporated into our Policies and Procedures Manual.

### **√**4.2.1.2.4

# Implementation & Readiness

Palco is a seasoned F/EA provider and has transitioned many programs from incumbent FMS vendors. Palco will leverage experience alongside our resources for change to execute a smooth transition. Palco will work closely with the exiting vendor to ensure data sharing is handled with integrity and to make sure communication to stakeholders is done frequently and through many channels, so they know what to expect.

On the Palco team, a designated project manager will oversee the transition with the support of the product manager and key senior leadership. Upon award, Palco will begin the necessary process to ensure registrations with the state Medicaid agency and any applicable state departments is achieved. Simultaneously, our leadership team will meet with key staff to develop and finalize the project schedule and deliverables. In addition to the schedule, Palco will develop other key resources for both internal and external benefit, including a communication plan.

We have led many implementations during our time in this industry and will build upon our existing experience to deliver a customized implementation plan for approval to Agency staff. Our mission is to minimize impact on stakeholders and stay on schedule. We emphasize collaboration and responding to Agency needs.

To ensure a successful implementation and to build the foundation for providing services to the Personal Options stakeholders, Palco's dedicated project team will be responsible for overseeing the work associated with the implementation and transition, including hiring and training local leadership and Resource Consultant staff. The Palco team includes representation from our executive team, senior leadership, operations directors, and subject matter expert team, who all have experience in previous transitions and implementations, including customer support, financial management, enrollment, and tax. We will hire West Virginia-specific staff who will help with the transition and take ownership of operational responsibilities.

During the implementation and readiness period, our Project Team schedules an introductory kick off meeting to introduce ourselves to the program and contract staff, confirm program understanding, document action items, and perform follow-ups to ensure project deliverables are met on time and as expected. Moving forward, we will schedule a series of regular requirement-gathering and communication planning sessions with pertinent staff. These meetings will be focused on:

- ✓ Developing a meeting schedule for the Implementation Phase to discuss, resolve issues, and establish procedures and protocols to support key Subagent-F/EA FMS operations, particularly:
  - o Program Setup
  - o Enrollment
  - o Budget Configuration
  - o EVV
  - o Payment Validations
  - o Billing and Eligibility
  - Notifications
  - o System Access
  - o Reports
- ✓ Establishing project management, customization of any key processes, and reporting standards.
- ✓ Engaging in a discovery process with Agency staff and stakeholders to develop policies, procedures, and references for Members/Employers of Record and Workers.
- ✓ Finalizing the implementation plan/work plan, which includes the project activities for a functional website by the agreed upon Operation Effective Date.
- ✓ Developing a training plan for Members/Employers of Record, Workers, and Customer Support Staff to be submitted to Agency staff for approval.
- ✓ Developing a plan for ensuring connectivity of all information technology systems, including MMIS and Prior Authorizations systems.
- Establishing communication protocols.
- ✓ Launching a communication plan for the individuals served by the program.
- ✓ Submitting periodic written status reports on the progress of tasks compared to the approved Implementation Plan.

Palco will develop the agenda for these meetings. At the conclusion of the planning meetings, Palco's project management lead will prepare and distribute meeting minutes and assign and follow-up on applicable action items.

Palco has developed an initial draft Implementation Plan for Agency staff to review. See Figure 2. We understand that there will need to be modifications made and are only providing a targeted execution timeline which will be modified with an agreed upon timeline. The full implementation plan along with a high-level Gantt Chart project schedule can be found in Appendix 2.

Figure 2: Implementation Plan

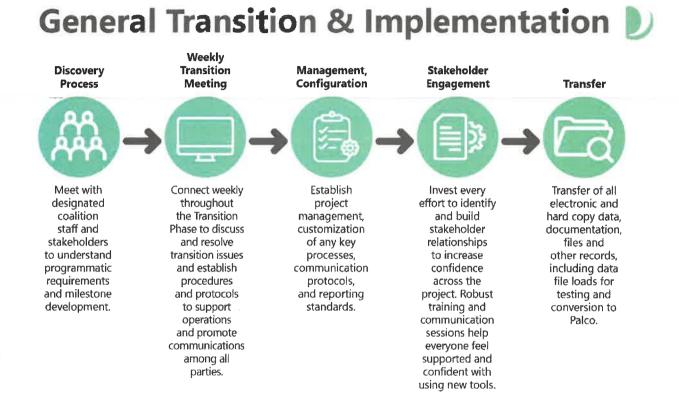
DPALCO	Implementation Plan Details				
Activity	Estimated Days	Estimated Hours	Assigned to	Pelco Departmen	
Contract Phase					
lotification of Award	1 Day	В	Alicia Paladino & Mark Siviano	Leadership	
Contract Negotiations	1 Day	8	Alicia Paladino & Mark Biviano	Leadership	
Contract Execution	1 Day	8	Alicia Paladino	Leadership	
Initiation Phase					
Prantize and attend Kickoff Meeting to identify programmatic goals and core operational guidelines	5 Day	80	Amella Barnes & Victoria Evans	Operations	
chedule Transition Meeting with exiting VF/EA & VF/EA (Palco) to agree on transition process.	1 Day	8	Amelia Barnes & Victoria Evans	Operations	
loseout Coordinator Identified with Exiting VF/EA and any other necessary key staff for the transition.	1 Day	8	Amelia Barnes &Victoria	Operations	
equre File Transfer Portal (SFTP) established between exiting VF/EA & VF/EA (Palco)	1 Day	В	Mike Brower	IT Department	
nroll as a West Virginia Medicaid Provider	1 - 2 Days	8	Paula Soli	Billing Department	
ecruit and Hire Customer Support Agents and Resource Consultants	60 Days	120	HR, Toni Rose & Victoria Evans	Human Resource Dep	
esearch state tax and labor laws and forms related to domestic employment and payroll taxes	1 Day	8	Stephanie Gallagher	Payroll Department	
Planning Phase					
efine Palco's Implementation/Project Team	1 Day	6	Alicia Paladino & Mark Biviano	Leadership	
eview, Define and document RFP Deliverables	5 Days	80	Amelia Barnes & Victoria Evans	Operations	
onfirm new Portal training & dates	1 Day	4	Cody Waits	Paico Training Dept.	
reft West Virginia Customer Support scripts and FAQ	24 Days	30	Toni Rose	Customer Support	
alco Draft "Welcome to Palco" notice to Clients / Authorized Representative-Employers and Aldes	1-2 Days	8	Victoria Evans	Operations	
aico Draft Support Broker Introduction letter to Participants/Representatives.	1-2 Days		Victora Evens	Operations	
ather new report requirements	14 Days	40	Cayle Cox	IT Department	
Development Phase		17.1			
	5 Days	40	Kady Predota	Operations	
ublish West Virginia information on the Palco website with program forms and resources alco configure CMP application for program (Case Management Partal)	30 Days	180	Jeff Leis & Mike Brower	IT Department	
alco configure Connect application for program (Cose Management Portal)	30 Days	180	Jeff Lets & Mike Brower	IT Department	
alco configure Intake application for program (Online Enrollment Portol)	30 Days	180	Jeff Leis & Mike Brower	IT Department	
alco develop new features for CMP application, if necessary	30 Days	240	Jeff Leis & Mike Brower	IT Department	
alco develop new features for Connect application, if necessary	30 Days		Jeff Leis & Mike Brower	IT Department	
alco develop new features for Intake application, if necessary	30 Days		Jeff Leis & Mike Brower	IT Department	
alco deviops EVV to West Virgina's specifications	30 Days	240	FiServ	IT Department	
alco develops new reports	30 Days	240	Jeff Leis & Mike Brower	IT Department	
Testing Phase					
alco test CMP Application	5 Days	40	Mike Brower	IT Department	
alco test Connect Application	5 Days	40	Mike Brower	IT Department	
alco test Intake Application	5 Days	40	Mike Brower	IT Department	
alco test Reports	5 Days	40	Mike Brower	IT Department	
alco Test EVV setup	5 Days	40	Mike Brower	IT Department	
est Cali Center Configuration and Activate	1 Day	4	Toni Rose	Customer Support	
est Disaster Recovery Plan; include schedule and resources	1 Day	8	Jeff Leis & Mike Brower	IT Department	
			Stephanie Gallagher & Taylor		
est payroll system and new hire reporting	3	24	Johnson	Payroll Department	
imeframe for computer networks to be installed and tested	7 Days	40	Mike Brower	IT Department	
Training Phase					
rain Support Staff Including Resource Consultants on Palco systems	30 Days	120	Cody Waits	Training Department	
rovide Resource Consulting Trainings to Participants/Representatives	30 Days	120	Cody Waits & Lexi Harris	Training Department	
	10 Days	40	Cody Waits & Kady Predota	Palco Training Dept	
reate training materials for all systems rain Clients/Employers on Palco systems	30 Days		Cody Waits	Palco Training Dept	
rain Customer Support Staff on West Virginia program policies and procedures	30 Days		Toni Rose	Customer Service	
rain Employees on Palco systems	30 Days		Cody Waits	Palco Training Dept	
			Stephanie Gallagher & Taylor		
ain Financial Operations Specialists on program policies and procedures	10 Days	40	Johnson	Payroll Department	
Implementation Phase					
alco CMP Application Live Updates Go-Live	1 Day		Jeff Leis & Mike Brower	IT Department	
alco Connect Application Live Updates Go-Live	1 Day	8	Jeff Leis & Mike Brower	IT Department	
nico Intake Application Updates Go-Live	1 Day	8	Jeff Leis & Mike Brower	IT Department	
emonstrate all outstanding issues have been addressed	1 Day	8	Amelia Barnes	Operations	
eview database modification to meet all requirements of this contract	1 Day	8	Jeff Leis & Mike Brower Alicia Paladino, Mark Biviano,	iT Department	
and any other constitutions of the day of the street and any other any other street and any o	1 Day	8	Alicia raladino, Mark Siviano, Jeff Leis & Mike Brower	Leadership & IT Dept	
eview the contingency plan for operations during an emergency situation erform Readiness Review to demonstarte completeness	5 Days		Amelia Barnes	Operations	
			CHIEFFO DOTTICS	OF STREET	

Operations Phase				
Confirm with exiting FMS 2023 Pay Schedule dates are correct	1 Day	8	Taylor Johnson	Payroll Department
Print any required forms that will be unable to be completed web-based and prepare mailing plan	10-15 Days	40	Cody Waits	Enrollment Department
Collect Transition Enrollment Paperwork for EORs and Employees	45 Days	400	Cody Waits	Enrollment Department
Configure automated triaging of common CS calls	1 Day	8	Toni Rose	Customer Support
Configure call queue (e.g. general inquiries, Spanish speaking, after hours VM)	1 Day	8	Toni Rose	Customer Support
Configure IVR systems and call prompts	1 Day	4	Toni Rose	Customer Support
Establish a dedicated toli-free telephone number with voicemail and call queue capabilities and the capacity to track all				1
communications from any source	1 Day	8	Toni Rose	Customer Support
Establish designated Toll Free E-Fax account	1 Day	4	Toni Rose	Customer Support
Establish EFTS account for Federal Tax Deposit, banking, funding, program funds, administrative fees	1 Day	8	Stephanie Gallagher	Payroll Department
Establish/setup Accounting system and general ledgers	2 Days	16	Stephanie Gallagher	Payroll Department
Establish refevent email accounts	1 Day	4	Mike Brower	IT Department
Establish TDD/TTY line	1 Day	4	Toni Rose	Customer Support
1st data transfer via SFTP using Template	1 Day	В	Amelia Barnes	Operations
2nd data transfer via SFTP (Changes to Jegacy data & New Client / Employer / Employee data)	1 Day	B	Amelia Barnes	Operations
3rd data transfer via SFTP using Template (Changes to legacy data & New Client / Employee / Employee data)	1 Day	8	Amelia Barnes	Operations
4th data transfer via SFTP (Utilized funds)	1 Day		Amelia Barnes	Operations
5th (Final) data transfer via SFTP (Client/Employer/Employee names, Demographics, and Final 2023 gross wages)	1 Day	8	Amelia Barnes	Operations
Fransfer SUTA Jog- in Information to Patco	60-90 Days	650	Stephanie Gallagher	Operations
Mail Resource Consulting Introduction Letters	2 Days	8	Victoria Evans	Operations
Resource Consultants make Introductory phone calls to Participants/Representatives	30 Days	360	Victoria Evans	Operations
Send out Transition Enrollment Paperwork	10 Days	40	Cody Waits	Enrollment Department
Milestone				
Start of first payroll with Palco	1 day	1	Stephanie Gallagher	Payroll Department
First Payroll Processed and Paid Out	7 days	40	Stephanie Gallagher	Payrolf Department

Early in the transition, Palco will use demographic data from the incumbent vendor to appropriately designate regions and begin recruiting and hiring Resource Consulting staff to support the population. This will assist in developing the process for enrollment planning and dissemination of information to the members. As they are assigned, Resource Consultants will outreach individuals to provide introductory information and guidance on the key steps they must take to ensure their transition goes smoothly. This personalized approach will help mitigate confusion and ease the minds of those transitioning. The customer support line will be immediately established with trained individuals available to answer questions about the transition and help members feel at ease. More information on how Palco will deliver Resource Consulting services can be found in Section 4.3.1 on page 120.

During transitions we work closely with the exiting vendor, train our internal enrollment, customer support, payroll, and billing staff on the policies and programmatic requirements of the new program. and develop training and communication materials to support the transitioning members and their workers. We work closely with our state partners to ensure our systems are ready for data transfers and file transmissions, working towards an integrated solution between our systems. We develop a transition plan including a detailed timeline, perform readiness reviews, and hold frequent internal and external planning meetings to engage all stakeholders in the implementation process.

Figure 3: Transition and Implementation



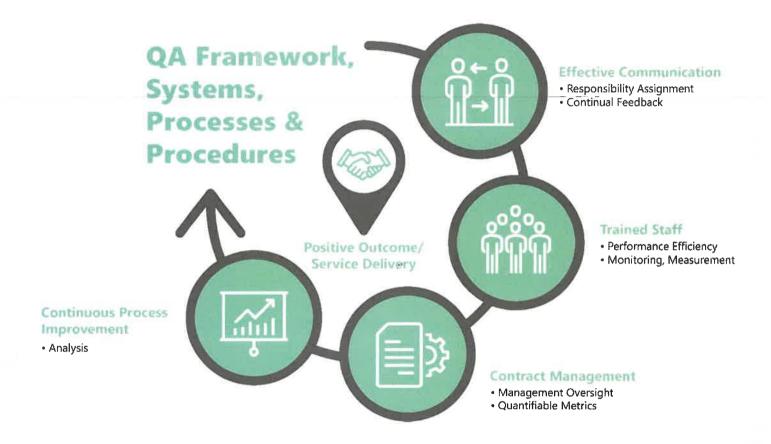
### **√**4.2.1.2.5

# Quality Management System

Palco maintains a Quality Management System for all Subagent-F/EA FMS tasks. As evidenced throughout our proposal, quality assurance and metrics are embedded in every task that we perform. Our Quality Management System has two major components:

- (A) PDSA Model of compliance performance standard tracking and auditing.
- (B) COSO Internal Control Framework to ensure privacy, security, and integrity of our information.

Figure 4: QA Framework, Systems, Processes & Procedures



#### **PDSA MODEL**

Palco relies on the Plan-Do-Study-Act (PDSA) model to evaluate new processes and engage in continuous quality improvement throughout the organization. The PDSA model provides a mechanism to evaluate new processes, new programs, or new systems by guiding the user through planning the change (Plan), implementing the change (Do), observing, and learning from the implementation (Study), and determining what modifications or improvements should be made to the process or program (Act). This model is cyclical so that we regularly engage in a thoughtful and purposeful evaluation of processes, programs, or systems leading to continuous quality improvement.

Do

We will collaborate closely with Agency staff to brainstorm and implement solutions that can be easily measured for success. Such actions are documented in our Quality Management Plan, which follows our West Virginia-specific Policies and Procedures Manual. Using the Plan-Do-Study-Act model, we can quickly adapt and adjust our processes using the built-in feedback loop for continuous quality improvement.

#### INTERNAL CONTROL FRAMEWORK

As guidance and oversight, Palco's internal control system is designed using the American Institute of Certified Public Accountants core guidelines on internal controls, including the Committee of Sponsoring Organizations of the Treadway Commission (COSO) framework, Accounting Standard Updates (ASUs), and the guidance provided by the Public Company Accounting Oversight Board.

COSO is the gold standard for best practices related to internal controls. COSO is a committee of five sponsoring organizations, including, and endorsed by the AICPA, that come together periodically to provide thought leadership on enterprise risk management, internal control, and fraud deterrence. Upon award, we will provide our Internal Control Manual as documentation. In short, this framework provides a control environment that establishes:

- Policies and procedures.
- Segregation of duties.
- Company culture founded on integrity.
- Reconciliation.

Internal controls cover all areas of operations, including monitoring worker eligibility and status, employer employment practices, tracking members' budget funds, verifying accuracy of timesheets, ensuring payroll accuracy, monitoring billing and claims submissions, and preventing, detecting, and reporting known or suspected fraud and abuse. Internal controls are documented in our Internal Control Manual, and they are tested at least monthly - with most common tasks tested weekly or even daily.

Reconciliations are performed on a continual basis to ensure quality. This includes financial account balancing, comparing data to ensure accuracy and completeness of transactions, and investigating discrepancies. Palco prepares and submits a bank account report, including a monthly reporting of bank account activity, a summary of the month's bank activity, reconciliation of the bank balance to the general ledger, and reconciliation of any amounts advanced to Palco.

The Agency will have access to our internal control and quality management tasks and outcomes.

## **√**4.2.1.2.6

## Turnover Plan

If it should arise that Palco was no longer acting as Subagent-F/EA FMS to the Agency, we will engage in a Turnover Transition Plan and provide at least sixty (60) days' notice. The plan will include the following activities at a minimum:

- ✓ Appointment of staff to manage and coordinate all turnover activities outlined in the Turnover. Plan as approved by the Agency.
- ✓ Plan to continue services until an effective turnover date is established.
- ✓ Transfer of information necessary to ensure continuity of services for the recipients.
- Implement a quality assurance process to monitor turnover activities.
- Establish and communicate key dates and activities related to the turnover of services.
- Provide a list of and timeline for post-turnover services, including filing tax reports, issuing W-2s, managing unclaimed property, reconciling final bank accounts and general ledgers, and providing final reports to the Agency.

We will execute the approved Turnover Plan in conjunction with the incoming vendor's Transition Plan, including maintaining service delivery staffing levels and providing all turnover data and documents, as well as take the other action items specified in the RFP.

## **√**4.2.1.4

# Change Management

In our industry, change is inevitable. We have learned from 25 years of experience that flexibility is mandatory. Our processes and systems are designed to ensure rapid adoption to changes in federal and state tax, labor, and program rules and requirements, including IRS changes in reporting, forms, and procedures; federal and state Department of Labor overtime and wage reporting changes; changes in state workers' compensation insurance rules/requirements; and state consumer-directed services program policies and procedures. With each challenge we have faced, we have provided quality F/EA

FMS and related support at vast cost savings while further honing our expertise in the provision of consumer-directed services.

Palco provides executive leadership that includes dedicated program Account Managers (see Section 4.5.1.1.4 for staffing on page 137) and a dedicated Project Manager who will assist the Agency during periods of industry or programmatic change. Our team has unmatched experience with largescale changes, and our track record supports our successful implementation of new programmatic initiatives. We employ a disciplined process of requirement gathering, Agency sign off, development, testing, and execution to ensure system features and changes are built correctly without surprises.

We understand rapid, organized, and timely launch decreases the burden on you and your members. To ensure quality requirement gathering, our experienced staff will focus on understanding the needs of the program and the goals that the State is aiming to accomplish. Tools like understanding and mapping out the end user experience, writing stories that keep the person at the forefront of the technology, and leveraging an agile sprint process help to ensure that we are successful in our acquisition of knowledge. See Figure 5 for an overview of the Palco Product Development Flow.

Figure 5: Product Development Flow

### Product Development Flow:

Opportunities for customer input and participation



As system development and configurations are completed, we provide demos for key stakeholders to collect feedback and verify satisfaction. Prior to releasing new features into production, staff will participate in a cycle of User Acceptance Testing (UAT). UAT is performed using real-world scenarios. Palco develops detailed test cases/scenarios. Once the application produces the expected results. Palco will determine a production release date. This plays an integral role in the implementation process leading up to go-live.

We also make available a sandbox test environment that allows stakeholders and future users the ability to log in and have hands-on experience using the applications without the risk of altering real member data or exposing sensitive personal and medical information unnecessarily. This environment allows the following activities:

- Testing user logins and permissions setup for program roles.
- ✓ Walking through the enrollment process for Members/Employers of Record and Workers, from basic demographic information to signing key forms online.
- Managing vendor information and program assignments.
- Viewing timesheets and payables.
- Running reports and downloading data.
- Entering and approving Worker timesheets.
- Viewing payments and paystubs.

### **√**4.2.1.6

# Approval to Act as Sub-Agent

Before Palco can begin performing financial management services for members/representativeemployers in the ADW, IDDW and TBIW programs as well as members in TMH, we must receive federal and state approval to be the F/EA.

Palco is recognized by the IRS as a Fiscal/Employer Agent operating under §3504 of the Internal Revenue Code. We have a separate FEIN for the sole purpose of acting as a Subagent-F/EA FMS entity and filing IRS forms and depositing federal taxes.

To become the Subagent to the Government F/EA FMS for the members/representative-employers, Palco submits Form SS-4 (or its electronic counterpart) to the IRS to obtain the individual's FEIN and register the individual as an employer/HCSR (home care service recipient) with the IRS. The FEIN is transferred to IRS Form 2678, Employer/Payer Appointment of Agent, which is sent to the IRS with a

request for appointment of agent. Once the IRS approves Palco as agent, we maintain the IRS LTR 1997C, Notice of Appointment, in each employer's file.

Should the IRS delay appointing Palco as agent, we will continue providing services under an executed Authorization Agreement. This document allows us to act as F/EA for the individual during the interim period of submission to approval. It also serves as an informed consent agreement statement between the Agency (Government F/EA FMS agency) with each member/representative-employer acknowledging the member/representative-employer is informed the Government F/EA FMS agency is using a Subagent, the tasks the Subagent is performing, and that the member-employer agrees. Once confirmation is received from the IRS and state agencies, we can file and pay employment taxes on behalf of members. We retain all documentation, executed forms, and identification numbers in the individual's case file.

We utilize IRS Forms 8821, Tax Information Authorization, to speak with the IRS in case we experience difficulty in obtaining a FEIN, becoming agent, or filing taxes. The form requires CAF numbers, which are designated to tax professionals, such as CPAs and attorneys. Palco CPAs' CAFs are prepopulated on Form 8821, when applicable, as second appointee on the 8821 alongside the State as Government F/EA FMS Agency. Executed copies of Forms 8821 are kept in each CLE's file and renewed, when necessary, as these forms expire after seven years.

We also register each employer with state income tax and unemployment agencies. To this end, we file executed West Virginia Form WV-ARI-001, Authorization to Release Information, and West Virginia Form 2848, Authorization of Power of Attorney, for each employer we represent. We retain all documentation and account numbers in the individual's case file.

This enrollment process is tracked in our electronic database in case of IRS error or other matters that may impede agency approval. It also serves as our internal control for this process, and all actions are documented in our Policies and Procedures Manual.

The IRS and West Virginia routinely update tax forms. Palco ensures we use the latest forms by subscribing to a multitude of publications, including the IRS website, the American Institute of Certified Public Accountants Tax Inside periodicals, and through Applied Self-Direction updates. We also check websites quarterly to ensure we are using the latest forms. Any updates, additions, and revisions are included in our processes and software, and our Policies and Procedure Manual is updated accordingly.

## **√**4.2.1.7

# Referrals & Prior Authorizations

Palco will enroll with the State of West Virginia's Utilization Management Contractor (UMC) to obtain referral, eligibility, and authorization data.

Palco's in-house Case Management Portal (CMP) is our singular location for the input and digestion of all referrals and prior authorizations. Information can be exchanged through a user interface configured for Resource Consultant/State staff through an automatic Application Programming Interface (API) established with the State's UMC for automatic input and execution. When necessary, we also allow other means of input, such as manual or Excel spreadsheet import of data. All initiation or referral data, regardless of the source, is checked for errors by enrollment quality assurance staff the day of receipt.

Palco receives prior authorizations from UMC and uploads them into our system daily. As an example, Palco receives daily service reports through an electronic data interchange for our neighboring Pennsylvania program, automatically inputting new and updated service authorizations into our CMP. Any issues or discrepancies with the data are identified immediately and assigned to Palco program staff for follow-up. This efficient and automated process prevents errors in data input and is almost instant. Incoming referrals are automatically routed to our program teams processing enrollments and providing training to ensure all barriers to accessing care are eliminated.

Prior authorizations seamlessly become part of the overall budgeting application, where the following information is displayed for Agency staff to view:

- Medicaid Member's name and ID, if applicable.
- Beginning and ending date of the budget.
- Whether this is a new, revised, modified, or terminated authorization.
- ▼ Type, number of units, and dollar amount allowed for payroll-related services.
- Type, number of units, and dollar amount allowed for non-payroll-related goods and services.

#### PALCO CMP BUDGET / SERVICE AUTHORIZATION MANAGEMENT TOOL

More than any other area of our application, we have invested in the Service Authorization module to meet any program's needs. Our module is extremely flexible because it needs to be to meet your needs. With each Service Authorization, we capture the following information and more:

- The overall Service Authorization Plan span term (e.g., biweekly, monthly, annual).
- Each individual Service Authorization line-item date span may be different from the overall span (e.g., one line-item authorization spans 18 days, while another authorization spans 365 days).
- ✓ The status of the overall budget and each line item. This allows users to disable individual. service authorizations that are no longer being utilized without having to disable the entire Service Authorization Plan.
- Procedure codes and billing modifiers for each service authorization, so that the billing information stays intact from point of entry through timesheets and on to the claims system.
- ✓ Budgetary or unit limitations on the entire Service Authorization, on groups of line items, or on individual line items. These limitations will be in terms of dollars, units, or both. If units are selected, we support varying unit lengths - 15-minute units, hour units, and daily units.

Our cloud-based budget module was built to be entirely flexible to support each member's unique plan. Through our years of experience in multiple states across the country, we understand how critical the set-up and revision of budgets is to ensure a successful payroll. Each individual budget contains all pertinent information about the members and qualified workers or vendors supplying the service, when applicable. Additionally, its graphical user interfaces display information that is easy to understand.

We know authorizations can often be complicated, with coverage being intermittent or provided on a unique timeframe (e.g., Personal Care is biweekly, but Transportation is provided monthly). Over the past two decades, we've learned some tricks on the best way to display this information. For example, the green bars in Figure 6 visually represent when a particular authorization has a gap in service.

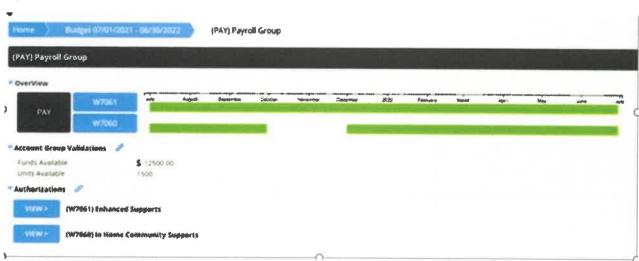


Figure 6: Service Authorization Overview

We try to avoid issues at the front end. Our Service Authorization module is embedded with controls driven by program rules, as defined in our backend rules engine. Full integration of this budget tool with the payroll processing and validation suite of the Palco CMP ensures that all payroll is validated against the Member's approved prior authorization before paying<sup>1</sup>.

- When budgets are entered, the system performs mathematical checks to compute payroll costs, considering the employer's unique tax rates. Upon the contract award we will configure the system for West Virginia tax rules.
- ✓ Limitations on overtime or other programmatic limitations, such as timely filing for billing purposes, will be defined in the Service Authorization. System alerts will be customized to prevent or simply alert users from attempting to sidestep those rules.
- Workers are limited to view and select only services for which they are enrolled and approved to provide to that member. Additionally, system controls prevent billing for items not authorized on the plan.

#### **ELIGIBILITY CHECKS**

To ensure that Authorizations are still valid, we run eligibility checks daily via a 270/271 or customized process. If UMC can ingest EDI files, Palco will use a 270/271 process; however, we are also accustomed to ingesting customized feeds. For example, for one program that serves over 2,000 individuals, we use an Excel spreadsheet to assess eligibility information and extract assessment and Fee-for-Service Managed Care capitation data, while for another program serving over 5,000 individuals, we use a 270/271 EDI process.

To conduct eligibility verifications, we first compile the data from our case management software and submit it to UMC. Eligibility checks allow us to block off time during ineligible periods in our system so that the Member/Employer of Record and Worker cannot submit time for ineligible periods. Eligibility verifications are typically done daily, but can be on a less frequent schedule, as agreed upon. We recommend that the checks be done at least prior to payroll. We also recommend that the checks include all individuals – not just individuals who are limited to submitting timesheets – as this will help ensure that time is blocked off from entry, should someone be moved to an active status by a Case Manager prior to full Medicaid eligibility. We also have the ability to access any UMC portal to check medical eligibility manually.

Lastly, our solution generates automated email notifications to members, workers, case managers, or Agency staff once authorizations are entered or if eligibility is lost. Using the workflow and queuing processes, if a Service Authorization is nearing expiration, automatic email notifications are generated to facilitate timely renewal. These notifications are configured to send at varying intervals, such as, but not limited to 24 hours, 1 week, 30 days, or 60 days.

<sup>&</sup>lt;sup>1</sup>For the purpose of determining service allocations and budgets, the Palco system also contains a budget calculator resource that can aid in the development of service and support plans all in one location. As an example, our budget calculator for our Colorado line of business is a good example of how we can accommodate a sophisticated task and hours set up to determine budget allocations including daily rates that compute into a monthly and annual allocation.

## **√**4.2.1.8

# Program/Budget Configuration

Palco knows from experience that programmatic policy and legislative changes happen quickly. When changes are needed, it's our job as the FMS to react and adapt quickly with minimal impact to our state partners, and program recipients. That is why we designed our system to be completely configurable and dynamic. This presents itself most profoundly in our Program/Budget Configuration module.

Here, Palco staff can instantly change existing business rules through a configuration module instead of being hard-coded. This is an important and valuable distinction because it means we do not need a developer to write new code or update existing code, test, and deploy it to production. As a result, you benefit from our ability to add, remove, or change service rates and any of their related features – such as whether the code is payable to workers, vendors, or both – in well under sixty (60) days at no additional cost to the Agency.

Some of the items you can easily change with a configuration are:

- Adding and removing service codes.
- Changing the minimum and maximum allowable rates for each service code.
- Minimum wage changes.
- Standard workweeks for overtime rules.
- ✓ Pay period frequency (e.g., daily, weekly, biweekly, or semi-monthly).
- Spending caps and/or funds or unit limits.
- Restricting certain codes from being payable to a worker or vendor.
- Adding paid time off to budgets.
- Changing default tax rates.
- ✓ Whether a service code is subject to EVV and/or EVV aggregation.
- ✓ Payroll validation checks that reflect programmatic rules in compliance with West Virginia program policy manuals and State EDI Companion Guides.

### **√**4.2.1.9

## MMIS Interface

Palco will enroll with West Virginia Medicaid Management Information System (MMIS) and obtain a West Virginia Provider ID to support electronic claim EDI submissions. Palco's ANSI X12 billing solution component of CMP supports multiple State and Managed Care payors and companion guides, and Palco has utilized this tool in a dozen states. Palco's expertise includes a skilled MMIS billing and claims team with more than 40 years of experience.

EDI submissions to the MMIS portal will be in accordance with Agency billing and contract requirements and procedure codes. As stated in Section 4.2.1.2.4 on page 14, one of the first steps in our implementation is establishing all the procedure codes and related business rules in our Case Management Portal. This establishes limits and double redundancies to ensure EDI submissions conform to Agency requirements. Palco will send the following EDI submissions, in accordance with Agency billing and contract requirements, using proper procedure codes:

- 1. Member service claims to/from MMIS, in compliance with Chapter 600, after the services are rendered. Prior to claims submissions, comparisons and reconciliations are conducted to ensure that we are billing the correct amount and that payment is not made for services provided to ineligible individuals or for services that are not authorized, and are in accordance with the members spending plan, established service rates, are in accordance with Agency billing and contract requirements and procedure codes.
- 2. Administrative per-member-per-month monthly claims will be submitted to the Agency in accordance with Chapter 600.

Claims will be submitted electronically to the Agency through the State's MMIS claims system for services performed within 90 calendar days of date of service, in accordance with the member's spending plan and established rates.

Further, Palco will check the MMIS portal regularly for notifications. After member services are completed, claims will be submitted for all payments received from the State's MMIS system in compliance with Chapter 600.

## **√**4.2.1.10, 4.2.1.11-4.2.1.19

## Claims Submission

In accordance with the state's billing requirements, Palco will bill Medicaid services and administrative services via the MMIS or the State's system. Palco currently integrates with various Medicaid Management Information Systems (MMIS), to support our billing functions. All billing records support the amounts of Medicaid services claimed on the Health Insurance Portability and Accountability Act (HIPAA) electronic claim form or EDI claim. All EDI transactions comply with HIPAA security standards for electronic PHI.

To ensure that HCBS services are not provided or billed when a member is admitted to a nursing facility, hospital, or Intermediate Care Facility for Individuals with Intellectual Disabilities (ICF/IID), eligibility is checked daily to determine any instances where the member is admitted to these facilities. If this occurs, the individual's case status in our system is updated to suppress their ability to submit time for the dates of service that fall within their facility admittance date span. Any time previously submitted for those dates (e.g., in the case we learn of the admittance after the fact), will be automatically rejected prior to turning into a claim. Our modern technology and business rules ensure the highest degree of proactive fraud prevention for your program.

To avoid surprises to the workers and vendors, Palco publishes our business rules surrounding payroll and vendor services, including Participant-Directed Goods and Services (PDGS), Environmental Accessibility Adaptations (EAA), and other participant directed vendor services. Such rules include comparisons against real data to ensure the validity of the claim and how to submit online claims. More information about payments can be found in Section 4.2.1.20-4.2.1.24 on page 33.

Our systems are embedded with a combination of controls that perform cross-checks and calculations to prevent over-billing of service hours or goods and services. Just before claims submission, the following comparisons and reconciliations are conducted to ensure that we are billing the correct amount and that payment is not made for services provided to ineligible individuals or for services that are not authorized:

Statuses during the period are checked against potential claims to ensure that the member does not receive services during "ineligible" periods, such as hospital stays. We have established processes for determining when a member is admitted to a nursing facility or hospital, and the length of stay, or if the member is otherwise engaged in any other activity that would render them ineligible for billing purposes. We train on self-reporting and false claims provisions during the Member/Employer of Record orientation and maintain touchpoints with the State

and Resource Consultants to ensure that we are notified of any changes in eligibility or status that could impact claims.

- Service authorizations have a matching prior authorization.
- ✓ The amounts claimed on vendor invoices or worker timesheets are compared to the service. authorization. Any excess amounts are not billed.
- ✓ The amounts claimed on vendor invoices or worker timesheets are compared to both established wage ranges and/or service rates.
- FUTA and SUTA thresholds for workers are checked against the general ledger to ensure that we bill the proper rate. If the worker has exceeded applicable wage thresholds, the rate billed will be reduced.

Palco will bill administrative services only for members who meet the following criteria:

- Have authorizations, with a corresponding service code, for the date of service being billed.
- ✓ Have completed their enrollment meeting with an active status.
- ✓ Have at least one DCSW who is qualified to provide paid services. (Unpaid work is not allowable) for billing administrative services.)

Once the claims have passed their initial checks and validations, we generate the 837 or similar claim. Claims are submitted via the state fiscal agent for services within 30 days of the date of service. All claims are submitted in accordance with the member's authorizations and State's billing and agreement requirements.

We accept response files in a variety of ways, but typically receive an 835, or a similar Remittance Advice once the claims have been processed. If the claim was not paid, we determine the cause and resubmit if necessary. Non-compliant files or transactions will be reviewed, adjusted, and returned for processing within the same payroll cycle. Our system is seamless on the backend, which enables us to send claims in large batches and receive large response files. Because everything is automated, adjustments happen quickly to resolve any billing disputes.

Medicaid and administrative services paid are reconciled to units billed and units paid on a weekly basis by the Billing Department, with Palco Internal Audit reviewing claims monthly. Adjustments, resubmissions, and corrections of claims will occur in a timely manner, within no more than threehundred sixty-five (365) calendar days of date of service. When we receive funds from Medicaid, we generate a report that compares them with funds authorized on the budget and funds billed.

Although our systems are tested, errors do occur from time to time. If a billing error occurs, Palco takes the appropriate action, which may include making refunds to the State. If necessary, we will bill the employer directly or work out a payment plan should their claims exceed authorized amounts. We understand that overpayment recoupments occur within ninety (90) days of identification, and we are responsible for replacing such funds.

To ensure quality, we review a billing sample on a quarterly basis and trace it through our accounting system to payment and billing. Our banking and accounting controls include the following:

- Proper segregation of duties engaged through the payroll process with operations separated from reconciliations.
- Reconciliations performed on a continual basis to ensure quality. This includes comparing hours of services billed and paid, a review of items left to be paid, reviewing records for accuracy and completeness, and investigating discrepancies.
- Maintaining billing records for internal audit purposes that verify amounts of claims and support claims.
- An accountability system including quality indicators, performance metrics, and methods for monitoring key indicators.
- Internal processes to ensure all areas of operations are, including worker eligibility and status, employment practices, tracking member's budget funds and spending plan activity, verifying accuracy of timesheets, ensuring payroll accuracy, monitoring billing and claims submissions, and preventing, detecting, and reporting known or suspected incidents of fraud and abuse, are all functioning properly.

Each time a payroll is complete, money received for payment of funds is reconciled to money paid out. In addition, each month, the bank statement is reconciled to CMP. Regular reconciling of all funding is critical to ensure that internal controls are performing properly, no fraudulent transactions have occurred, and individuals are using their budgets appropriately.

Should the State elect to move towards Managed Care, Palco has the experience to bill in a managed care environment including those serving diverse populations and multiple waivers. We currently bill various MCOs in multiple states. In some states, we work with multiple MCOs for the same program, meaning that we submit three billing files - one for each payor MCO. In other Managed Care environments, we send encounter data. Palco is versed in MCO billing, and our systems support all ANSI X12 EDI file exchanges.

Palco will only bill for services that have been authorized. The Agency, Resource Consultant, or member/representative-employer can access, and review services authorized and/or services utilized as well as remaining balances on our online portal, as shown in Figure 9 and 10 in the next section.

### **√**4.2.1.20-4.2.1.24

## **Payments**

For each program, we establish and maintain an accounting and information system for receiving and disbursing State funds, and for tracking transactions and balances. Palco understands the public fiduciary responsibility we are tasked with, and we take it seriously. As a company owned by CPAs, finances are proactively managed and business decisions are made conscientiously. Palco continually audits program funds. Among other fiduciary oversight tasks, Palco's Chief Financial Officer, and Chief Executive Officer, both Certified Public Accountants, review monthly reconciliation reports and financial statements.

Our banking and accounting controls include the following, approved through a Board resolution:

- ✓ The owners of Palco are the only allowed signees on our bank account. All checks must be signed. by an owner of the company, who are both licensed Certified Public Accountants bound by codes of professional ethics related to financial integrity.
- ✓ Our financial institution has an exclusive list of pre-approved entities that can withdraw money or debit funds from our accounts. Such entities include the IRS for tax payments, the program, and state tax authorities. Anyone not on this list cannot debit funds. Funds withdrawn must be approved by the Board of Directors and may only be for program taxes, insurance, and bank charges absorbed by Palco.
- ✓ Annually, we execute a notarized Memorandum of Understanding (MOU) with our financial institution. This MOU establishes a clear understanding that the account's funds belong solely to the Medicaid beneficiaries, and creditors are not allowed to encumber or acquire funds from this account.
- ✓ Randomized time-sensitive passcodes are generated by our financial institution each time we send a direct deposit file to prevent unauthorized access to funds.
- Proper segregation of duties is engaged through the payroll process with operations separated from reconciliations, for example.
- ✓ Palco follows Generally Accepted Accounting Principles (GAAP) in the use of a general ledger. and subsidiary accounts for handling of member funds.
- ✓ Reconciliations are performed on a continual basis to ensure quality. It includes financial account balancing, comparing data to ensure accuracy and completeness of transactions, and investigating discrepancies.
- ✓ Palco prepares and submits a bank account report, including a monthly reporting of bank account activity, a summary of the month's bank activity, reconciliation of the bank balance to the general ledger, and reconciliation of any amounts advanced to Palco.



Palco will retain a one-time minimum reserve to pay for three (3) months of estimated service costs prior to the contract start date to account for retroactive payments from the Agency for billed claims.

Palco will prepare, issue, and disburse worker payroll and vendor payments on an agreed-upon schedule, per the State payday requirements, and will manage all federal, state, and local employment related taxes and insurances in compliance with federal, state, and local requirements. We take fiscal responsibility seriously. We carry out Subagent-F/EA tasks under Section 3504 of the IRS code and Rev. Proc. 70-6, as modified by Rev. Proc. 2013-39.

Palco fully understands the requirement to educate members on payment submissions and will ensure services are not billed before they are rendered, except for transition services, Environmental Adaptations (EAA), and Participant-Directed Goods and Services (PDGS). We will also ensure that we enable the option for vendors to receive electronic payments via our online portal, which is described more in Section 4.2.1.97 on page 78.

### **MONITORING TAX EXEMPTIONS**

As previously mentioned, Palco's cloud-native and 24/7 accessible Case Management Portal serves as the multi-tenant repository for all program member-related data and program business rules. This modern technology platform, built in-house and designed for self-direction, is the backbone of the Palco service delivery. It contains various modules for case management (records, member info), accounting (utilization, pay ledger/history, repository of pay rates and employer cost rates, exemptions, tax rates, workers' comp, budgets), billing, enrollment, time entry, and reporting.

Our internal core team of expertly trained certified public accountants are equipped with software that makes monitoring tax exemptions a cinch. All of the uncommon tax scenarios and exemptions found in self-directed service models and states across the U.S. have been accounted for within our configurable software. Elements including the ability to individualize exemptions and program rules based on various relationships at the worker and employer level ensure the highest degree of financial ethics in the industry, guaranteed to keep more money in the hands of the State, Member budgets, and DCSWs.

As we know, DCSWs who provide domestic services may be exempt from certain taxes, like FICA, FUTA, or SUTA, depending on their familial relationship with the employer (see IRS Publication 15 and IRS Revenue Procedure 2013-39 for more details). Palco has the capacity to calculate deductions related to Difficulty of Care payments per IRS Notice 2014-7, should the Department choose to accommodate this offering. Palco currently accommodates this on both state and federal income taxes in multiple states.

When payroll is calculated in our system, we determine if the worker is over their FUTA or SUTA wage threshold for the year. If so, no additional taxes are charged.

Additionally, States are occasionally subject to a FUTA Credit Reduction process. Because Palco has faced this many times in the last quarter-century, we designed our system to handle such changes in the least obtrusive way possible. When States face FUTA credit reduction or changes to the default SUTA rate, Palco globally adjusts the FUTA or SUTA rate for all employers in our system with a click of a button. There is no need to adjust rates individually or wait for an IT production system deployment for the rate to be adjusted. Our modern technology ensures these configurations are possible without an abundance of resources.

Please note that although the SUTA default rate is globally adjusted, it only impacts new employers who do not have an experience rating with unemployment claims. Our system stores unique SUTA rates for each employer.

When a worker is exempt from taxes or over threshold, Palco exempts the specific taxes from payroll and the employer share of such taxes are not billed in our claim submission process. This fully individualized process is the most fiscally responsible process and sets Palco apart from other FMS vendors.

Palco's software, built for consumer-direction, provides interactive dashboards and visibility for internal and external professional users to understand exactly how these taxes are set up — on both an employer and worker level. The Employer Cost tab within our Case Management Portal (CMP) provides a detailed breakdown of all taxes and budget expenditures while allowing users to dig down into a specific worker's cost via the interactive dashboard. The "Quick View" tab provides a snapshot of the default employer cost comprised of the standard FICA, FUTA, SUTA, Sick Time (when applicable), and Workers' Compensation (when applicable) costs every employer is subject to. Palco understands that the West Virginia program workers are not subject to workers compensation at this time and the system would be configured appropriately for this. See **Figures 7 and 8**.

Figure 7: Employer Cost Quick View



The "Details" tab provides a breakdown by worker and allows users to toggle between workers to view their individual costs and any exemptions they may have elected. Palco charges the employer cost on an individual basis rather than in the aggregate. Charging the employer cost in the aggregate is a commonly used practice by many industry FMS providers. Doing so unfairly charges the member (and State) for costs they did not actually incur. Palco only collects the necessary taxes, down

to the penny for that worker. This best practice saves the State money and ensures fiscal responsibility of Medicaid dollars is upheld. It also ensures that the member can maximize every penny.

Figure 8: Employer Cost Details



Worker residency, relationship with the employer, and live-in status collected during enrollment provides tax exemption and overtime calculation information in accordance with IRS rules regarding domestic employment, the Department of Labor Home Care Rule, and state employment-related rules. Workers are paid according to the rate set by their employer (which may differ by worker) in compliance with federal and state tax and Department of Labor wage and hour rules for regular and overtime pay. Payroll calculations are discussed in more detail in Section 4.2.1.68, 4.2.1.82 on page 66, and related payroll tax filings are discussed in Section 4.2.1.69-4.2.1.81 on page 68.

### **BUDGET SPENDING MADE EASY**

Palco's goal is to make budget utilization transparent and easy to understand. Our portal's budget spending summaries and payment details are accessible 24/7 by Agency staff, Case Managers, and Member/Representatives to allow them real-time management of authorizations and hours, a critical piece of the consumer-directed service model. Reports can be generated directly from our system by Agency staff, Case Managers, and Member/Representative at any time. Reports compare monthly and cumulative self-directed service expenditures to the amounts allocated in the member's budget and spending plan.

Spending reports can be generated to output items occurring within a set of service dates - or it can be generated on a budgetary period, as shown in Figure 9. Both views - dollar amounts spent and remaining, as well as related percentages of spending - are shown. When applicable, units are also shown.

Figure 9: Spending Summary 1



After making selections, users can see starting and ending balances, as well as percent utilized. When accounts are overspent, they display in red text. Each section can be expanded by clicking the arrow next to the line item.

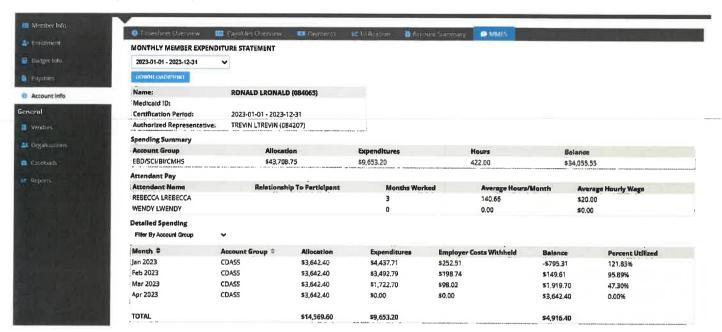
Figure 10: Spending Summary 2

KS WORK - PAYROLL	STARTING BALANCE: 6729.83	
NIGHT SUPPORT		
IADLS / ADLS		
	SUBTOTAL: \$-6697.	15
	CURRENT BALANCE: \$32.67	
	UTILIZED: 99.51%	
TRANSPORTATION	STARTING BALANCE: 56,00	
	SUBTOTAL: \$0.00	
	CURRENT BALANCE: \$56.00	
	UTILIZED: 0.00%	
EMERGENCY MONITORING	STARTING BALANCE: 39.95	
	SUBTOTAL: \$-39.95	
	CURRENT BALANCE: \$0.00	

"Funds" describes how many member/representative-employer funds were utilized during a particular time period. This information can be filtered by account group, authorizations, and/or payee. A line-item listing provides the name of the payee (worker), reference ID, time period, and amount utilized.

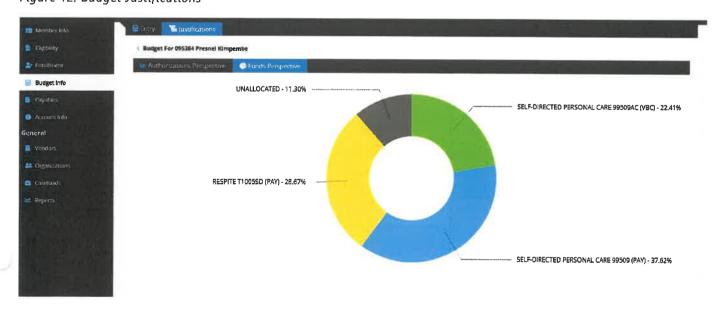
This information is also reflected in additional views that many of our members/representativeemployers and Agency partners find helpful. For example, our system includes a Monthly Client Expenditure Statement tool (Figure 11 below) that displays real-time information of allocations, utilization and balances for a specific monthly time frame. This feature is particularly beneficial in a program where budget authority is incorporated, and members/representative-employers have full control requiring them to monitor their balances and reserves.

Figure 11: Monthly Member Expenditure Statement



Furthermore, professional users like State/Agency staff and Case Managers can benefit from our interactive widgets as exampled in Figure 12 below and system tools such as our budget justification snapshot which can help individuals understand from a quick glance what services are being utilized the most for their care needs. In this example Case Managers can quickly see the breakdown of how this member is utilizing their authorized services and what amount of services is remaining to be allocated for other services like goods and vendor payments. Each section of the chart can be drilled down further for more data and valuable analytics about the allocation and utilization.

Figure 12: Budget Justifications



## **√**4.2.1.25-4.2.1.49

## Enrollment

Over the past 20 years, we have streamlined the enrollment process by simplifying our documents as much as possible, requiring only the necessary information to appropriately render services, and remain compliant with our programs, states, and federal requirements. Palco's online cloud-based enrollment system is the most user-friendly in the market and allows Members/Representative-Employers the opportunity to sign all required forms online, enroll via a completely paperless process, and track the entire process online in under 3 minutes.

When the Member elects to enroll in the consumer-directed service model, Palco will provide outreach and two methods of packet distribution:

- 1. Online enrollment. Enrolling online through the portal is the fastest way to sign up for the program. Users sign and submit all forms online and are notified of submission errors in realtime, allowing them to correct issues before finalizing and submitting documents.
- 2. Paper packets. Individuals may request a mailed or emailed packet. The customer support agent logs the request in the web portal, where it can be tracked. An enrollment specialist generates a prepopulated packet with the click of a button, and the packet is sent to the individual via secure, encrypted email or mailed to the individual's home.

We will customize our user-friendly Member Enrollment Packet and Worker Enrollment Packet to contain all forms and information required under this program. Our goal is to reduce enrollment wait times and make the transition to self-direction as smooth as possible. We prepopulate all packets to the extent possible to reduce the fields that families must complete, and we offer a variety of solutions for completing packets. All enrollment packets will be available on the program page at www.PalcoFirst.com.

No matter the method, Palco prefills as much data as possible to mitigate potential errors, speed up enrollment times, and remove a common barrier to receiving services. Such data includes Palco's information (e.g., contact information, FEIN, our agents), Member and/or Employer of Record information (e.g., name, address, date of birth, phone number, and other identifiers), and general information (e.g., "HCSR" for "Home Care Service Recipient," as required, in member title fields).

All materials are available in alternate formats upon request and are in an easy-to-read and -understand format. Palco's contact information for questions and technical assistance is printed on all materials.

Packets are reviewed against a standard checklist to ensure accuracy and completeness. Should a paper packet contain forms with incorrect or missing information, the information is logged into our system. Automatic emails will also be sent to individuals who provided an email address.

Only the forms with errors are returned with an explanation of how to remediate the errors. Follow-up activities are notated in our system through a workflow tracking system. This monitors the time taken for enrollment, how long errors have been outstanding, and allows our customer support center to see all information in realtime should an individual call regarding additional questions or needing assistance with the process. Notifications are done via mail, email, or phone, when applicable.

Enrollment staff quality check and review each form. Packets are processed within two (2) days of receipt. Mistakes are rarely made with online enrollment packets because of the system's real-time

### **PA Transition**

When Palco took over the program for Pennsylvania, the state was plagued with extremely long enrollment times – up to 27 days in some cases. After we took over, we completely revolutionized stakeholder access to selfdirection with enrollment processing times of less than one (1) business day month after month for more than three (3) years straight.

integrity checks and workflows. However, should there be errors, they are logged into the system and communicated within three (3) days. Automatic emails notify the enrollee of the error in clear and specific language, directing them to the issue(s). Reminder emails are sent at various time intervals after the initial submission.



"Dicia (Palco Enrollment Specialist) explained what the forms that were needed for the changes I needed to make. She was very kind, and I felt like she knew what she was talking about. She took care of my paperwork quickly and let me know once they were completed. I was very impressed with her knowledge and guickness."

-Randy L. from Arkansas (Used with permission)

After a completed submission, the following important steps occur:

- Data is inserted directly into our database.
- The documents are saved in our document management system in the enrollee's case file with appropriate metadata tags for easy retrieval. This eliminates the need for scanning, which can sometimes result in hard-to-read forms, potentially delaying enrollment.
- An immediate, real-time notification is auto generated and sent to the Palco enrollment staff assigned to the West Virginia enrollment work queue to complete additional tasks, such as background checks or obtaining tax identification numbers.

All packets, regardless of the source, are stored electronically in our Portal. Therefore, anyone with access to our system can view the approved and rejected documents sent to Palco.

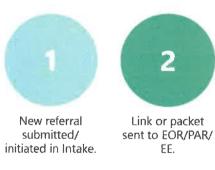
Enrollment activities are supported with our Policies and Procedures Manual. To support quality and ensure a smooth and transparent enrollment process, we monitor all enrollment-related activities, including paperwork completion and worker clearances, through the following:

- An electronic checklist, which captures key dates and events such as mail date, follow-up activities, background and credential checks, and receipt of forms, is utilized so that all staff know where the individual is in the enrollment process, should they call for assistance.
- ✓ Application of benchmarking standards, such as the time it takes to enroll and credential providers.
- Reports for cases with a pending enrollment status, expired licenses, or credentials, and taking follow-up action to complete enrollment and renew the DCSW's information.
- Management review.

See Figure 13 below for an enrollment workflow summary. Through every step in the process, our staff is here to help guide users.

Figure 13: Enrollment Workflow Summary

### Intake - Process Flow





3



User logs in, completes the forms, signs electronically and submits.



Palco enrollment is notified of submission and reviews for completion.



Forms are processed. required checks completed, and good-to-go email issued.

#### **ONLINE ENROLLMENT**

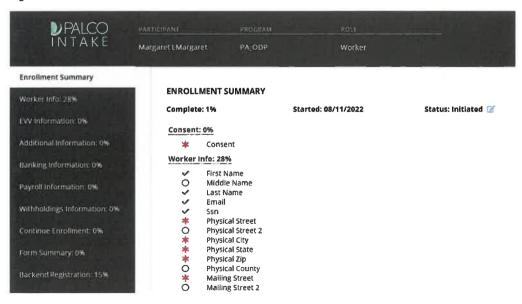
Palco's enrollment system is cloud-based and can be accessed securely from any web browser. Enrollment online is the preferred method of enrollment because it is fast and practically error-proof. The system ensures that all required data elements are captured and that every required field on the forms is completed before submission can occur. Submission of a completed enrollment is instant, getting the forms directly into the hands of an enrollment specialist (rather than waiting on the delays of the USPS, a scanner, or email box).

Members/Employers of Record (or Workers) who elect to enroll online receive an automated email notifying them that their packet is ready for completion. Each welcome email contains an encrypted token that allows the user to access their personal enrollment. Access is granted once security is verified.

Once the enrollee is logged into the system, the user is guided through a step-by-step workflow. Fields or forms requiring review or signature are flagged. As items are completed, the enrollment wizard, constantly navigating them through the process, notifies the user of their remaining steps to complete.

Palco's Intake application has built-in controls to prevent form submission until all required fields are completed accurately. Errors are displayed in real-time for users to fix immediately prior to submission. Figure 14 below provides a visual of the enrollment summary tab alerting the user to missing information, as denoted by a red asterisk. When using the Palco portal to complete the necessary forms, the total estimated enrollment time averages less than three (3) minutes.

Figure 14: Intake Enrollment Tab



Once an enrollment is completed, the user submits it to Palco with the click of a button, and they are able to download their completed forms for their records.

#### PAPER-BASED ENROLLMENT

While online enrollment is highly encouraged, Palco understands the needs of the self-directing population with limited access to technology; therefore, we maintain a paper-based enrollment option to ensure all individuals have access to services. In the event a paper enrollment packet is received, Palco staff immediately scan and route the enrollment documents through our document management system, where they are time-stamped with the date of receipt. All forms are pre-coded with appropriate information prior to us sending them. These codes allow our system to automatically route documents and forms to the appropriate program enrollment processing queue. This queue is staffed with Palco Enrollment Specialists dedicated to this project. They understand the unique requirements of the consumer-directed program.

Palco will issue a "Good to Go" notification that alerts the Member/Representative-Employer and consumer-directed worker that services can begin and payment for services to be rendered is approved. An example of this notification can be seen in Figure 15 below. Notifications include custom program-specific language and a start date that is configured based on the program rules. Some programs allow for services to begin on any day of the month while others may limit start dates to the beginning or a specific day within the month. The Palco Intake system can configure the notifications to reflect these business rules and provide the recipients with the exact details for their service delivery.

Figure 15: Good-to-Go Notification Email

Melissa Castellanos Participant: Alejadra Portillo - Palco ID: 516571 Employer: Ricardo Santander - Palco ID: 51657: Worker: Melissa Castellanos - Palco ID: 516574 Palco, Inc. is pleased to inform you that you have completed the program's envollment process and have been issued a Good-to-Go status by Advansas DHS with an effective date of 2021-03-23. Please remember that Medicaid does not authorize Palco, Inc. to pay for any hours your Medicaid requires that you record and submit your time using Electronic Visit Verification (EVV) via either the mobile application or telephony. Please ensure you are set up and registered with EVV through your employer Connect is our online portal, the easiest way available for you to view time submissions and review pay stubs Please visit our website https://palcofirst.com/ for additional information and program forms. Respectfully DENTIALITY NOTICE: This e-mail and all attached material are private and confidential. All materials are privileged and are intended solely for the intended recipient. Any unauthorized copy, disci result in legal liability on your part. If you have received this transmission in error, please notify Polco immediately of (501) 604-9936 or privacy@polcofirst

#### MEMBER/EMPLOYER OF RECORD ENROLLMENT

A Member/Employer of Record Enrollment Packet will be submitted to the Agency prior to the go-live date. Packets contain the following information:

Cover letter with introductory information that explains the packet and roles, policies on pay including overtime and budget, responsibilities and services related to Palco, the Agency, and the Employer of Record. It also includes important information about the availability

of materials in alternate formats (e.g., large print, braille, Spanish), and roles and responsibilities of the employer, member, worker, and vendors. Palco's contact information, hours of operation, and location are all also available in the packet.

- ✓ Information about the enrollment process, including details on background checks and employment eligibility requirements.
- ✓ A checklist of all forms and requirements to assist in completion.
- Clear instructions describing the form's purpose and completion requirements, providing examples of properly completed forms, as well as submission instructions if using online enrollment (or a self-addressed stamped envelope).
- ✓ Intake and Referral Form to verify contact and basic demographic information and obtain emergency contact information.
- Payment schedule that shows timesheet weekly pay cycles, due dates, and paydays.
- ✓ Portal tutorials that guide individuals on accessing and using our system and how to obtain technical assistance to support them.
- Employer of Record Agreement/F/EA-Agent Consent Form.
- Designation of Surrogate Employer of Record (optional).
- ✓ IRS Form SS-4, Application for Employer Identification Number.
- ✓ IRS Form 2678, Employer Appointment of Agent.
- ✓ IRS Form 8821, Tax Information Authorization.
- ✓ West Virginia 2848, Authorization of Power of Attorney.
- ✓ West Virginia WV/AR-001, Authorization to Release Information.
- ✓ Information regarding the use of EVV and approved time entry and tracking, including the requirements for compliance and consequences for not maintaining compliance.
- Worker Intake Form (supplemental).
- Worker Status Change Form (supplemental).
- FMS Termination Form (supplemental).

A draft copy of the Member/Employer of Record Enrollment Packet can be found in Appendix 3. We maintain touchpoints with the members, conducting phone calls or in-home visits to assist the individual with completing the packet.

Palco will further include the documents required to obtain Workers' Compensation Insurance, when required. To aid in the education of workplace safety, we will include a thorough packet of information including site and home safety checklists, how to identify and report injuries, what to do when an emergency occurs, and universal precautions to avoid injuries. Copies of retained forms are maintained in the Employer of Record's file for up to six (6) years.

As explained above Palco will use the IRS Form SS-4 to obtain a FEIN for each member we represent. We will also file the WV/BUS-APP, Business Registration, and obtain employer account numbers for state income tax withholding and state unemployment insurance purposes. Palco will register the member as an employer with the municipality, as we do in bordering states, such as Ohio and Pennsylvania. Municipal fees are also submitted, as required, for registration and payment. Palco assumes all penalties for failure to register or pay municipal fees. This process is explained in more detail in Section 4.2.1.69-4.2.1.81. Copies of all forms are retained in our files.

#### **DCSW ENROLLMENT**

The DCSW Employment Packet Includes the following:

- Cover letter with enrollment checklist, including how to receive assistance, which contains a tollfree number and information about the customer service and complaint systems.
- ✓ Information about the enrollment process, including details on background checks and employment eligibility requirements.
- ✓ A checklist of all forms and requirements to assist in completion.
- ✓ Clear instructions describing the form's purpose and completion requirements, providing. examples of properly completed forms, as well as submission instructions if using online enrollment (or a self-addressed stamped envelope).
- ✓ Intake and Referral Form to verify contact and basic demographic information and to obtain emergency contact information. This form will assist us with collecting information for the West Virginia New Hire Reporting system.
- ✓ IRS Form W-4, Employee Withholding Allowance Certificate with instructions.
- WV Form IT-104, West Virginia Employee Withholding Exemption Certificate.
- ✓ US CIS Form I-9, Employment Eligibility Verification with instructions.
- ✓ Medicaid Provider Agreement.
- ✓ West Virginia Provider Service Agreement.
- West Virginia Employment Agreement.
- Background consent forms.
- West Virginia DHHR Protective Service Check Form.
- Application for pre-employment Criminal Background Check through WV Clearance for Access: Registry and Employment Screening (WV CARES).
- Employee Training Verification Form.
- Confidentiality Agreement acknowledging that the DCSW agrees to respect the privacy and confidentiality of members' protected health information.
- Timesheet due dates/payday schedules.
- Instructions for reporting hours worked, due dates, pay schedule.
- Relevant information about approved service codes, when applicable.

- Rate sheet.
- Direct Deposit Information and Selection Form.
- Tax and Overtime Information Worksheet to determine if a DCSW meets any criteria to be exempt from FICA/FUTA/SUTA under Section 3 of IRS Publication 15, exempt from federal income tax withholding under Difficulty of Care of foster care/shared living arrangements, or exempt from overtime pay under the Fair Labor Standards Act (FLSA) Home Care Rule as a live-in domestic employee.

We process IRS Forms W-4 and IT-104 within five (5) days of receipt. We ensure that prospective workers meet qualifications and credentials before clearing him or her for hire by verifying citizenship status and state of residence and processing criminal background and abuse registry checks. Our enrollment team confirms the worker's Social Security Number through the Social Security Administration's Business Services Online system. We also check the I-9 status of the individual to ensure they are able to legally work in the United States.

Copies of all documentation including completed forms, new hire documentation, and results of criminal background checks are maintained in the applicable worker's file.

A draft copy of the DCSW Employment Packet can be found in Appendix 4.

## **√**4.2.1.45-4.2.1.46,4.2.1.56

# Background Checks & New Hire Reporting

Palco will assist with the facilitation and administration of criminal background checks from the West Virginia Clearance for Access: Registry & Employment Screening (WV CARES) program. Our West Virginia-specific enrollment specialists will review result determinations and provide those results to the member/representative-employer within two (2) business days of receipt. Palco will maintain a file with background check results for all DCSWs. Palco ensures that the following employment clearance registry checks and criminal background checks are completed prior to employment:

- ✓ Rap Back Notifications List of Excluded Individuals and Entities (LEIE) will be received and maintained with a notice of the disqualified DCSW provided to member or representativeemployer within one (1) business day of receipt along with the DCSW's employment terminated.
- ✓ Health and Human Services Office of Inspector General (HHS-OIG) List of Excluded Individuals and Entities (LEIE).
- Other exclusion and/or professional board databases as applicable.
- National Sex Offender Registry.

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

Once an individual is properly enrolled as a DCSW, we report and document new hires to the West Virginia New Hires Program within the requisite timeframe of hire or rehire. Palco maintains employee information in our database. This information can be shared with employers seeking DCSWs on the worker registry. Copies of the West Virginia New Hire Documentation will be maintained in the worker's file.

We process determinations of the DCSW's qualifications to work for a member/representativeemployer based on fingerprint-based state and federal background checks per Agency requirements. The U.S. Department of Health and Human Services, Office of Inspector General (HHS-OIG) prohibits persons that have been convicted of fraud of a state or federal agency, or who have been debarred, suspended, or otherwise excluded from participating in federal health care programs, as listed in the federal List of Excluded Individuals/Entities (LEIE) database.

At the time of enrollment and re-enrollment, Palco will electronically verify that DCSWs are not listed in the U.S. Department of Health & Human Services Office of Inspector General's (OIG) exclusion database using the enrolling DCSWs Federal Employer Identification Number and/or Social Security Number. Additionally, Palco's database of active DCSWs is automatically checked against the OIG's downloadable LEIE database of excluded individuals and entities monthly. Exclusion list check results are recorded in Palco's system as DCSW statuses that include the date of the exclusion validation and the results of each validation along with a historical record of prior checks and the dates and results of each check.

When results produce barrier crimes or a founded complaint, we immediately terminate the DCSW from employment on the date of discovery by deactivating their account. This notifies our payment processing system to disengage any payments, and it also prevents the worker from being able to enter time into the online time entry system. Any pending payments to the worker are also voided. The member/representative-employer is immediately notified that their DCSW is disqualified from employment. We then provide the following communications to the appropriate parties involved:

- An outbound phone call by our customer service staff followed up with a letter to the DCSW.
- Email to the relevant parties.
- ✓ Report provided to the State, listing the name of the DCSW, pass/fail results of the background. check, date of the check, and date of renewal (if applicable).

This process is managed through an electronic enrollment system that allows for input and results of required checks and relevant dates. Through a notification and alert system, our staff is notified when clearance renewals, if applicable, are coming due within 30 and 60 days. Within the 30-day window, the renewal request becomes populated on an action item list to be reviewed by the enrollment team and management.

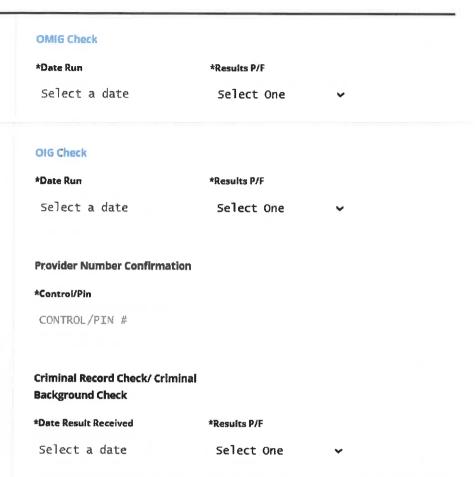


All background check results are tracked in our system. Members/representatives-employers are notified within two (2) days of the findings. Copies are retained in each DCSW file.

Through continuing quality assurance checks, random audits, monthly monitoring, and other activities, we will discover any DCSW who loses eligibility between renewal cycles. These providers will be placed in an inactive status with the reason for the status change documented. Palco will not enroll any DCSW that is found to be ineligible to receive federal funds. Palco's reporting, status system, and direct communication will aid in continual monitoring of DCSW eligibility to receive federal funds.

Palco is experienced with background check renewals and is prepared to assist the state of West Virginia with a renewal process every 5 years or at any frequency determined necessary. In several programs, Palco facilitates a renewal process and has a 98% return success rate! In 2022, Palco requalified 2,200 workers for our Pennsylvania service line over the course of 4 months, a process that goes beyond background checks by also revalidating credentials and certifications the program deems as required. Our Intake system is configurable at the program level to document the specific background requirements necessary and track those in compliance. Dynamic statuses ensure that if a worker is out of compliance their pay can be withheld automatically to ensure quality assurance at the program level is always maintained.

Figure 16: Background Check Result Tracking via Intake



## **√**4.2.1.35, 4.2.1.40, 4.2.1.44, 4.2.1.45

# Vendor Engagement

As with Employer Enrollment Packets, our staff also assists the DCSW or vendor with completing packets. We process Vendor Engagement Packets, and file completed forms with the appropriate federal and state agencies within two (2) business days of receipt of information. If packets contain errors, we notify the vendor within three (3) days. All executed forms are retained in our files. Completed online enrollment forms are retained within our Case Management Portal (CMP) and available for viewing by Agency staff in real time, 24/7.



The Vendor engagement packet will include at a minimum:

- Cover letter with enrollment checklist, including how to receive assistance, which contains a toll-free number and Information about the customer service and complaint systems.
- ✓ Information about the enrollment process, including details on background checks and employment eligibility requirements.
- A checklist of all forms and requirements to assist in completion.
- ✓ Clear instructions describing the form's purpose and completion requirements, providing examples of properly completed forms, as well as submission instructions if using online enrollment (or a self-addressed stamped envelope).
- ✓ Vendor Payment Information Form.
- ✓ IRS Form W-9, Request for Taxpayer Identification Number and Certification and instructions for vendors who provide approved goods and services.
- ✓ IRS Form SS-8, Determination of Worker Status for Purposes of Federal Employment Taxes and Income Tax Withholding and instructions for when to use the form, when applicable.
- Medicaid Provider Agreement.
- West Virginia Provider Service Agreement.
- ✓ Information about PDGS, EAA, and other participant-directed vendors engagement information forms.
- Participant-directed vendor invoice due dates and payment schedule.
- ✓ Participant-directed vendor invoice format for submission of payment requests and instructions for submitting invoices for payment.
- Application for Approval of Participant-directed Goods and Services, Environmental Accessibility Adaptations, and other vendor-provided services if applicable.
- ✓ Participant-directed Goods and Services, Environmental Accessibility Adaptations, and Community Transition Services Disallow List, if applicable.

When it is determined that a vendor is an independent contractor, we obtain the W-9 within thirty (30) days. We verify the FEIN that the vendor reported on their W-9 with the IRS or Social Security Administration, as appropriate.

Vendors are enrolled using the Palco Case Management Portal via our Vendor Enrollment Module that captures the required necessary data such as Vendor name, Federal Employer Identification Number, Vendor Type, and the services they are authorized to provide. Our internal quality controls ensure that vendors are authorized and that they are qualified to provide services before services are processed and paid. Copies of all packets and relevant vendor information are retained in case files.

## **√**4.2.1.50-4.2.1.54

## **Employer Orientation**

As individuals and their families make the decision to enroll in this service delivery model, Palco will provide a streamlined and knowledgeable support system to get their services started. Using a personcentered approach with the foundation of consumer-directed philosophies and principals, the Palco enrollment team will work to quicky process referrals for consumer-directed services to enroll the Member or their designated representative as the Employer of Record. Palco acknowledges the individual's right to take responsibility over their lives and will assist in empowering this right. Palco will help the Member take an active role in employing their DCSWs through recruiting, interviewing, creating job descriptions, hiring, setting hourly rates, and supervising their DCSWs. This ensures the philosophy of participant-direction and founding principles are incorporated in the delivery of every participant's services.

Palco values education and training in all aspects of our business, both internally and externally, as evidenced by our dedicated in-house training team of self-direction experts. Knowledgeable users of consumer-directed services are a key component to a successful program, and we know that when people are informed, they are empowered. We provide initial Enrollment Orientation and Skills Training sessions to Members/Employers of Record as well as refresher trainings (as needed). We provide training in a variety of formats including self-paced tutorials, instructor-led group training sessions, and individualized one-on-one training sessions.

Palco takes a dedicated person-centered approach to all interactions by considering the Member's preferred location, preferred method of learning, and necessary learning supports. In many cases, this requires an in-person, face-to-face visit to best meet their needs. The main goal of the initial enrollment orientation and skills training session is to accomplish the following tasks:

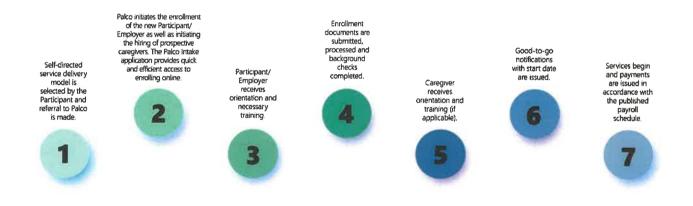
- Provide an accessible, vet comprehensive, orientation skills training for Members/Employers of Record.
- Observe the Member's outward wellbeing in his or her natural environment.
- Assist Members/Employers of Record with acquiring the knowledge necessary to ensure a thorough understanding of their role and program guidelines and that program guidelines are met.
- Assure that benchmarks for health, safety, satisfaction, and utilization of services by the Member
- Guide the Member in developing a peer support system or obtaining a Representative, when needed.

- Certify that the Member/Employer of Record has the skills necessary to be an effective Employer in a consumer-directed service delivery model and assess possible risks.
- Establish the frequency and level of monitoring needed to readily identify problems and encourage successful self-direction.
- Provide each Member/Representative-employer with a Program Manual that includes pertinent information for program participation, such as how to recruit, interview, hire, manage, and supervise a DCSW.

Our Skills Training Policies and Procedures Manual emphasizes the application of the philosophy of participant-direction and shows that we foundationally believe in a culturally sensitive, personcentered approach to providing every aspect of program services and supports. Training and orientation will be conducted during the enrollment process as outlined in Figure 17.

Figure 17: Enrollment with Orientation & Training Timeline

### Palco Enrollment Timeline for Fiscal/Employer Agent Model



Palco Resource Consultants will use a West Virginia Orientation and Skills Training Guidebook as a resource to guide these training session(s) to ensure consistency in the delivery of training content. An example of the Orientation and Skills Training Guidebook we currently use in Arkansas is included in Appendix 5. The guidebook will contain key concepts, scripts, and detailed examples to help ensure the trainee learns and retains important information.

Prior to conducting the member/representative-employer orientation, Palco will perform a readiness assessment to identify and address any issues that may impede the member/representative-employer's success in self-directing their services. Upon Agency approval, the training will include the topics outlined in Table 1.

Table 1: Orientation and Skills Training Topics

Topics	Description		
Palco Introduction	Covers general information about Palco, Subagent-F/EA FMS tasks, hours of operation, key contacts, communication access points, when to expect callbacks from voicemails, and toll-free phone, fax, and TIY numbers.		
Program Introduction	Covers general information about the program, Palco services, West Virginia's program policies, roles of all parties, overview of self-direction, use of protected health information and Palco's privacy practices, member rights and responsibilities.		
Employer Responsibilities	Reviews member rights, risks and responsibilities, review of needs setting, and strategies for goal attainment.		
Designating a Representative	Role and responsibilities of the representative-employer, including who can be a representative and how to determine when a member should have a representative. Ensuring the representative understands the needs of the member and has the member's best interests in mind.		
Employer Paperwork	Completion of enrollment paperwork and explanation of forms. A copy of the forms is included with the program manual.		
Employing a Caregiver/worker	An overview of the hiring process including how to advertise, recruit, interview, and screen candidates, as well as developing questions for the interview and reference checking; how to complete paperwork; and reviews effective communication with workers, supervision and monitoring of work performed, and conflict resolution skills.  Employers should also address performance issues and send Palco Worker Termination Forms within twenty-four (24) hours of terminating a DCSW's employment.		
Program Information	<ul> <li>Person-Centered practices when providing services to people with disabilities and individuals with intellectual and developmental disabilities.</li> <li>Program-specific policies and procedures, such as how to complete packets, ensuring DCSW background checks are completed, processing worker hours for payment, payroll and vendor invoice procedures, how to purchase approved PDGS, EAA, PERS, or Extended Therapy Services and Community Transition services (including online payments).</li> </ul>		

Topics	Description	
Budgeting	<ul> <li>Pay rates and schedules.</li> <li>Using the web portal for payment.</li> <li>Time capture, including the use of the mobile app and EVV compliance.</li> <li>Submission of required documentation and withholdings.</li> <li>Satisfaction-surveys.</li> <li>Importance of monitoring self-directed services, included in members' budgets to ensure receipt of appropriate services.</li> <li>Purpose of budget, authorized services, and how hourly rates and</li> </ul>	
	employer taxes impact the budget. Review and engagement of Palco's interactive online budgeting tool that allows members and Resource Consultants to change certain budget components and watch how it impacts the fund balance.	
Payroll and Timesheets	Review of payroll schedules, timesheet completion and submission protocols, and related forms. Includes an overview of W-2s.	
Compliance	Fraud and abuse training, as required by the False Claims Act.  Education of what constitutes fraud and why and how to report it.	
Workplace Safety	Workplace safety issues and strategies for effective reporting and management of workplace injuries. Critical incident identification and reporting as well as Universal Precautions.	
Risk Assessment	Risks are reviewed (e.g., risk in the home or environment, disasters, risks by participating in the self-directed model). Plans for mitigating the risks are established.	
Emergency & Backup Planning	Development and implementation of the emergency backup plan required by CMS, identification of opportunities for backup support within their community and with other natural supports. Exploration of methods for monitoring the backup plan, and timeline for testing the plan. Preparing and implementing corrective action plans as needed and developing and using risk management and emergency DCSW back-up plans.	

Palco provides an Employer Manual with detailed information on all the key concepts for Members/Employers of Record to use as a reference.

At the end of the orientation and skills training session(s), if approved and desired by the Agency, the Palco Resource Consultant (RC) can administer a Post Training Assessment to evaluate the Member/Representative's understanding of the self-direction program and their role as an Employer. The Post Training Assessment is a 20-question, multiple choice quiz covering employer tasks, program rules, fraud/waste/abuse, and safety. Questions are written specifically to ensure understanding of the



most critical and key tasks. A draft example of the Post Training Assessment & Evaluation can be found in Appendix 6.

Upon completion of the Post Training Assessment, the Palco RC can determine if the Member/Employer of Record has passed with a score of 75% or higher (or some other threshold, as agreed to by the Agency). Questions and concepts will be re-reviewed in detail with the Member/Employer of Record to ensure the correct information is absorbed. The Palco RC will work with Members/Employers of Record who score less than the "passing score" to determine their willingness and ability to proceed. Dependent on program policy, if they wish to receive continued education and training with the Palco Resource Consultant to retake the Post Training Assessment, the Resource Consultant will facilitate this or work with them to identify a new individual willing to serve in role of the representative employer. This Assessment also helps Palco evaluate our own skill training effectiveness and will be provided to the Agency for approval.

Following the orientation and skills training session(s), the Palco Resource Consultant will assist the member/representative-employer in developing a spending plan. The spending plan serves as the framework for how the member/representative-employer will utilize budget funds and schedule their DCSWs once services begin.

### **BACK-UP PLAN DEVELOPMENT**

Palco's RC staff will assist the Member/Employer of Record in developing and implementing an Emergency Backup Plan and designating an Emergency Backup caregiver/worker by engaging in a person-centered dialogue about the member's natural supports. These conversations are helpful in identifying appropriate backup caregivers/workers who can help when the member's regular DCSW cannot work for any reason. Our staff will also continue to assist the Member/Employer of Record in monitoring the effectiveness of their Emergency Backup Plan, including identifying additional natural support as necessary. We strongly encourage the Member/Employer of Record to ensure that the identified backup caregivers/workers are formerly enrolled in the event short-term support is needed during turnover of the primary DCSW.

Emergency Backup Plans are housed in our Case Management Portal (CMP) for easy access by the State program staff and other support staff. Palco Resource Consultant staff will review Emergency Backup Plans at least annually with program Members/Employers of Record but will also revisit the Emergency Backup Plan any time there is a change in condition or DCSW turnover. Any changes to the Emergency Backup Plan will be housed in our Case Management Portal for quick access by external stakeholders like the State program staff. Members/Representative-Employers will also have the ability to view and download their plans via the Palco Connect portal.

Within Palco's case management platform, several service planning and backup module capabilities exist within our Individual Service Plan (ISP) suite. A user interface built for more intense resource consultant services provides a tool for collecting, documenting, and exchanging information for members. Palco can provide this customizable resource to the West Virginia program if desired to enhance the oversight and

program management being delivered. Information captured in this tool is stored within the Palco CMP and is visible to professional users 24/7.

Figure 18: Individual Service Plan (ISP) suite components



Backup plan information is collected and stored in the system should any issues or needs arise. This visibility helps ensure that the support individuals associated with the member have all the necessary information to provide high value service support. Members complete each section of the backup plan through a system-led module that collects consent to key safety concepts and documents their personal plan for emergencies and contingencies. All information, once stored, can be printed to a template where all the data is organized for the member's record keeping. Figure 18 above and Figure 19 below provide insight into the different backup plan sections contained within the ISP module.

Figure 19: Backup Plan Consent - ISP

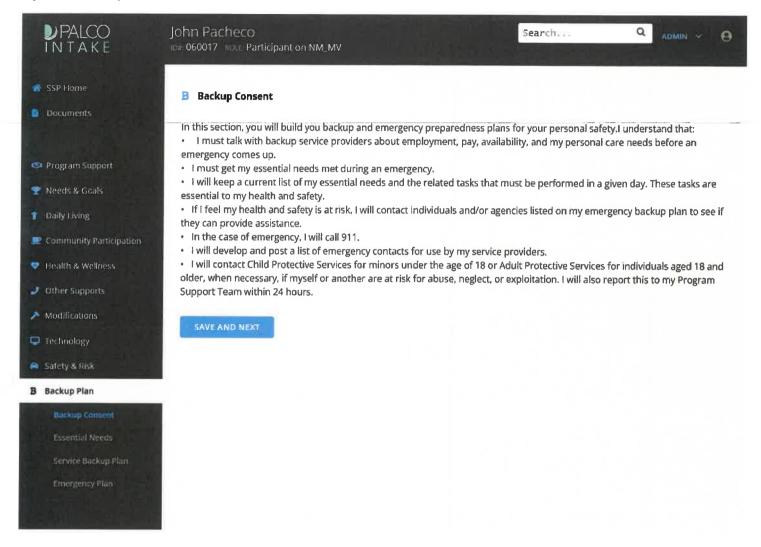
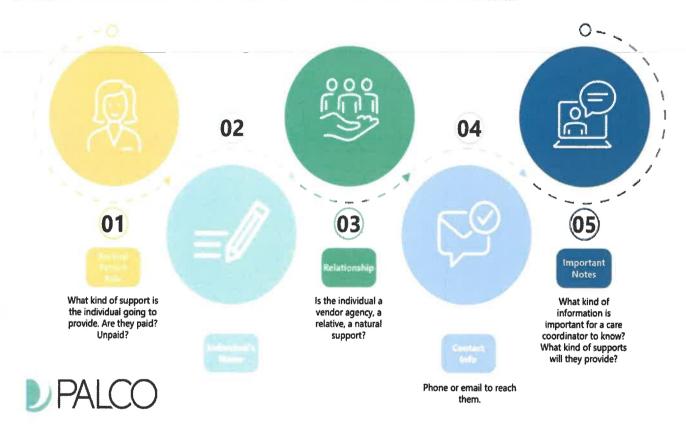


Figure 20: Backup Plan Service Contingencies

## Service Backup Plan

ithin the Palco system, the individuals backup plan is documented and visible for professional users. The following information is captured as part of the robust service plan to ensure adequate backup care is accounted for in unforeseen circumstances.



Two resources Palco Resource Consultant staff provide in the welcome packet to all members include the Healthcare Emergency Card and the Backup Plan Care Decision Tree.

These handy resources allow the member to document their needs and store the information in an easily accessible location such as their fridge or coffee table.

Please see **Appendix 5** for a copy of these resources.

## **√**4.2.1.55-4.2.1.64

# Payroll Rules

Palco's payroll system is backed by a rules engine that ensures we have all of the proper information to generate a payment to the DCSWs and vendors, including the following:

- ✓ The member is Medicaid-eligible prior to any DCSW or vendor payments being sent.
- ✓ Palco has determined whether the DCSW or employer are exempt from certain taxes per state or federal rule, as described below.
- Whether the DCSW is a non-West Virginia resident.
- ✓ Palco processes DCSW payroll and related federal, state, and municipal tax withholding in compliance with all federal, state, and municipal regulations.

Additionally, prior to being paid, Palco will ensure the prospective DCSW meets the minimum qualifications required.

- Must be at least 18 years of age.
- Must pass a criminal background check as outlined by state and program rules.
- Must complete all required training.
- ✓ Must complete all required enrollment forms including to become a West Virginia Medicaid Provider.

DCSW residency, relationship with the employer, and live-in status collected during enrollment provides tax exemption and overtime calculation information in accordance with IRS rules regarding domestic employment, the Department of Labor Home Care Rule, and state employment-related rules. DCSWs are paid according to the rate set by their employer (which may differ by worker) in compliance with federal and state tax and Department of Labor wage and hour rules for regular and overtime pay.

Some DCSWs who provide domestic services may be exempt from certain taxes depending on their familial relationship with the employer (see IRS Publication 15 and IRS Revenue Procedure 2013-39 for more details), as shown in Table 2. We collect familial relationship information during the enrollment process so that we withhold taxes properly.

Table 2: IRS Paid Family Member Tax Exemptions

	Child Employed by Parent	Parent Employed by Child	Spouse Employed by Spouse	
FICA	Exempt until child is 21	Exempt (unless 3 conditions met)	Exempt	
FIT	Withheld			
FUTA	Exempt until child is	Exempt	Exempt	
SUTA	Exempt until child is 21	Exempt	Exempt	

Withholding information from the IRS Form W-4 is used to calculate federal income tax withholding. However, if the requirements of IRS Notice 2014-7 are met, the DCSW is exempt from paying these taxes. Palco has the capacity to calculate deductions related to Difficulty of Care payments per IRS Notice 2014-7, for both state and federal income tax withholding. We currently perform Difficulty of Care exemptions in multiple states.

Our system also captures municipal or similar codes to ensure taxes are withheld properly. Local municipal taxes and local service taxes are also calculated depending on the individual's jurisdiction of residency.

When a non-West Virginia resident DCSW provides services for a program member/representativeemployer in West Virginia, Palco engages in appropriate protocols, such as providing multi-state tax tables to ensure proper payroll calculation. When necessary, we provide the applicable forms for the worker to claim reciprocity.

Lastly, we ensure DCSWs' hourly wages are in compliance with all applicable federal and West Virginia Department of Labor wage and hour rules, including payment of overtime wages. Any DCSWs who identify as being exempt from overtime per the Federal Fair Labor Standards Act (FLSA) Home Care Rule, DOL Fact Sheet #79, or Administrator's Interpretation No. 2014-1 for share living or foster care, will be paid at regular rates for hours worked over 40 during the standard work week. This includes situations where multiple members used a shared employerrepresentative.

Copies of all documents related to determining withholding or overtime payroll rules are maintained in the DCSW's, the employer's, or Palco's master current and archived files. Palco has standard reports that the Agency or member can view at any time.

## **√**4.2.1.65-4.2.1.67

## Timesheet Submission

Palco provides DCSWs with timesheets, instructions, and a Timesheet Submission and Payday Schedule that complies with the West Virginia Department of Labor payday requirements for hourly employees, as well as program policies. This information and the process for preparing and submitting DCSW timesheets is covered in the employer packet and on our website.

Timesheets contain all relevant information, including the employer and DCSW names, case IDs, service dates, time in and time out for each shift, total hours worked, attestation that the time entered is accurate, and signature lines. Timesheets are built to accommodate split shifts and varying service types.

Timesheets are collected and processed quickly. We know that individuals rely on this income to support their families, and we are committed to making this process smooth. Employers have several options for submitting DCSW timesheets, at the employer's convenience. Timesheet submission options include submitting them electronically via EVV, online via website or mobile device, and, if needed, by fax, email, or paper submission via regular mail. Paper-based timesheets are entered into our online platform by Palco staff.

### CMP CONNECT® SECURE WEB PORTAL

Connect® is Palco's web-based time entry system. Connect allows for secure electronic timesheet submission Members/Employers of Record and their DCSWs. It is accessible and functional 24 hours a day, 7 days per week. Connect contains the following user-friendly and interactive features:

- Mobile-friendly.
- ✓ Real-time timesheet status information.
- Real-time validation of timesheets to check for errors.
- Electronically notifies the user of errors upon entry and prior to submission.
- Multiple channels for resubmission of timesheets with errors prior to the deadline
- Seamless integration with EVV, supported by the Fisery AuthentiCare® mobile application on the backend that meets the demands of the 21st Century Cures Act.
- Enables users to view, update, and print real-time and historical information, such as direct deposit information or tax withholdings.



Connect

Connect is Palco's online timesheet systern that integrates with Electronic Visit Verification (EVV). It is accessible only by the employer and workers. Connect allows timesheets to be created, edited, tracked, and submitted. The employer and workers also have access to reporting, utilization, monitoring, and pay stubs.

- ✓ Contains resources and reports for users, such as copies of documents like paystubs and W-2s.
- Capable of auto-scaling during periods of high traffic.
- Accessible and functional 24 hours/7days a week.
- Cutting-edge, cloud-based technology.

Our EVV solution is supported on the back end by AuthentiCare®, which has been battle tested in over a dozen states. This application meets CMS certification requirements by capturing:

- The type of service performed.
- ✓ The Member receiving the service.
- The date of the service.
- ✓ The location of service delivery.
- The DCSW providing the service.
- The time the service begins and ends.
- The method in which the check in and check out is made.

Palco with its partnerships provide a fully integrated EVV solution that is operationally designed with the self-direction service delivery in mind. Utilizing a near real-time, secure-claim web service and application programming interfaces, Palco has developed a strong partnership with the AuthentiCare® EVV solution that we can bring to the Tennessee stakeholders. Palco currently works with this technology in five states including Arkansas, Pennsylvania, New Mexico, Colorado, and Kansas. Our established and successful partnership with First Data Government Solutions, LP, a subsidiary of Fiserv, Inc., hereafter known as FDGS, and their leadership team has earned us the trust of thousands of self-directing participants and their workers. AuthentiCare is the first EVV system to be used by any state for full certification by CMS under the latest Outcomes Based Certification (OBC) process.

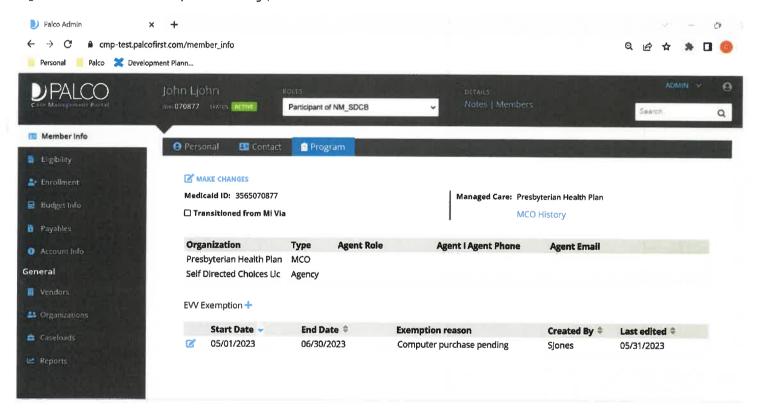
We offer flexibility for continuous collection of visit information in rural locations that may not have cellular connectivity. The mobile app has two modes of connectivity for DCSWs: Standard and Frontier. Frontier mode overcomes connectivity issues found in rural areas by collecting the check in/out data offline and uploading it at a later time when connectivity is restored. DCSWs use the mode that best fits the connectivity options in their area.

DCSWs install the free mobile app on their own phone or tablet and use it to check in and check out when providing care. The system uses the device's network time and GPS location to verify the start and end times of the visit and the location of service in real-time. Visit information is stored on the device until the DCSW has Wi-Fi or cellular data coverage, and then the data is automatically uploaded, providing a paperless solution.

Palco is experienced with tracking EVV live-in exemptions as utilized with the West Virginia program. Individual records within the system contain data fields to indicate if a worker is exempt, the

qualification reason for their exemptions (program specific), and the date the exemption is approved until. See Figure 21 below for an example of the EVV live-in exemption field within CMP. If a user has an approved exemption in the system, the user interface they experience in Connect is modified and tailored to them. For example, when manually entering a shift in Connect that requires EVV a required edit reason can be configured to ensure compliance with the cures act and aggregator specifications, a user with an approved exemption would not be required to select an edit reason. In some programs, annual or triennial re-qualifications of this exemption status are required, and Palco is experienced in collecting these exemption documentations. For example, our Colorado program requires all workers with an exemption to resubmit an attestation and supporting documentation annually to prove shared residency between the worker and participant. Our program specific enrollment specialists are trained and skilled in efficiently executing this process and our modern technology is configured to track and document every element.

Figure 21: EVV Live-in exemption tracking field



Security features of the online time-entry portal include:

- Data is encrypted while stored on the device.
- Access to stored data is available only with the DCSW's username and password.
- DCSWs are authenticated into the app using a two-factor authentication.

- This multi-factor authentication is required at least daily and each time the DCSW logs out or shuts down the app.
- ✓ The app locks after 15 minutes of non-use.
- Username and password are required to access after timeout locking.
- ✓ After the phone is locked, username and password are required to access the app.
- NIST-based password policies are in place.

Palco Connect allows Members/Employers of Record and their DCSWs to view their EVV shifts as an electronic timesheet, allowing them to review their shifts for accuracy before submitting for payment. Connect is the single location for all shift management for self-directing stakeholders, making EVV a less cumbersome and more manageable task. A process flow can be seen in Figure 22.

Figure 22: Time Sheet Process Flow

## Time Sheet Process Flow





Timesheets submitted online or via mobile devices are automatically checked for errors and individual budget compliance issues upon submission. System edits are designed to prevent entry of incorrect, incomplete, and duplicative timesheets. Error messages are displayed on the screen to allow for the correction of incorrect or incomplete information. If a user tries to enter a duplicative timesheet (same dates, types, and units of service), the system will not allow entry. Users are limited to entering only services authorized on the Service Authorization. This helps prevent payroll and billing errors on the front-end, as opposed to after payroll.

Additionally, any times that are entered that appear to be duplicative or overlapping with times already entered into the system will be rejected. For instance, a user would be notified if they tried to enter a shift from 3:01 p.m. to 5:01 p.m. if the system recognized that time was already entered for the same

Figure 23: Time Entry

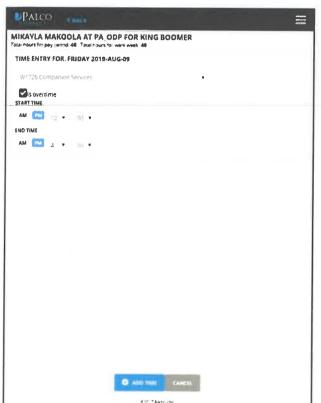
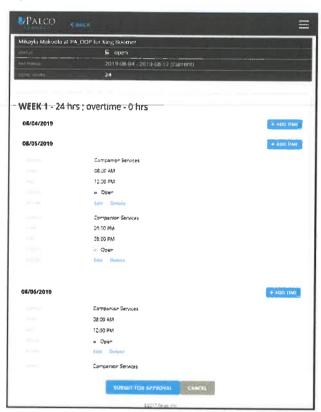


Figure 24: Electronic Timesheet Detail



day and service type during any times in this range, no matter when the shift begins or ends. We review all pending timesheets each time payroll processing is performed. Through this system, we review timesheets and ensure that pending timesheets are ultimately resolved quickly, and we prevent payment of incorrect timesheets for most issues.<sup>2</sup>

Once submitted, a notification is automatically emailed to the other party (e.g., if the DCSW entered the time initially, the employer would receive the notification, and vice versa) that time is ready for review. Here, the user can take a variety of actions. They can approve it, which sends it on to Palco for processing. They may choose to reject the time, which sends a notification to the initiator of the time submission that their time was rejected. Or they may correct the time and resubmit it - in this case, the initiator must log in again to approve the amended time. We provide online tutorials, training materials for users, and call center support for providing real-time assistance to electronic timesheet users.

If the timesheet contains errors, the member/representative is notified via system notifications and our customer support team. Resource Consultants can personally connect with individuals new or

<sup>&</sup>lt;sup>2</sup> If is not prevented at the timesheet entry stage, exception reports and quality checks done prior to producing payroll will catch timesheets that should not be paid due to various issues.

struggling to learn the time entry system and instruct them on correcting and resubmitting their timesheets. Connect tracks individuals who chronically make claims that exceed spending plan amounts or program limitations and can notify resource consultants and program staff. Energy is spent in a proactive manner to correct issues and ensure the next payday is a smooth one.

Implementing EVV with a self-direction population requires patience, intensive training efforts, and exemplary customer support. We provide online tutorials, training materials for users, and customer support, providing real-time assistance to electronic users. Palco has developed and provides DCSWs with instructions on how to manually enter time and instructions for timesheet submissions in accordance with the payday schedule. This information and process for preparing and submitting Employee time is covered in Member/Representative-Employer orientation and skills training described in Section 4.2.1.50-4.2.1.54 on page 50.

Our software is embedded with a combination of controls that perform crosschecks and calculations to prevent over-billing. Some examples include a series of variance and exception reports along with error message displays on timesheet and claim processing tabs in our system. These instant alerts to potential overbilling allow us to remedy the situation promptly.

When a client has exhausted their budget, we reimburse any valid portion of the timesheet when possible - or "pay to the limit." Hours attributable to exhausted funds are split from the original timesheet and routed back to the user for correction.

## **√**4.2.1.68, 4.2.1.82

## Calculating Payroll

Timesheet data is compared to budgets, checking for errors and individual budget compliance issues upon submission. Additionally, the following payroll system edits occur to prevent payment:

- Incorrect, incomplete, duplicative, or otherwise erroneous timesheets.
- Payment for unauthorized services.
- Payment to ineligible members and DCSWs.
- Payment during a period of facility admission.
- Payment of timesheets older than one year from the date of service.

Exception Reports itemize discrepancies, such as timesheet reporting for individuals who have an inactive status or timesheet hours that exceed budget-authorized hours. System validations built specifically to support the WV program will ensure all necessary program rules and restrictions are validated before a timesheet is approved for payment.

An example of this includes checking for multiple workers providing services to a single member at one time, something some programs prohibit. When this or a different program rule violation occurs, the system is configured to identify the shift in question and reject or hold it for further follow up and review. Palco management staff, composed mostly of CPAs, review these reports carefully to determine the appropriate action to be taken for each instance. All issues are communicated to the Members/Employers of Record for revision, resubmission, and prompt payment of DCSWs.

Our system has proven to be effective in tracking and responding to occurrences of payment request over-billing and payment requests that cannot be paid due to missing or erroneous information. If a payroll error occurs, Palco takes the appropriate action, which may include a recoupment for overages plan, particularly when the DCSW works in excess of approved hours or repaying the overage from our own funds. All issues are communicated to the employer with sufficient time for revision, resubmission, and prompt payment.

Palco's payroll software automatically calculates the total payments for DCSW timesheets, including federal and state withholding and employment-related taxes and overtime rules, as described in Section 4.2.1.69-4.2.1.81 on page 68. Medicare and Social Security tax (FICA), federal income tax (FIT), and state income tax (SIT) are withheld from DCSWs' paychecks each time a payroll is generated. SIT is calculated at the applicable West Virginia income tax rate. Municipal taxes are also calculated. Palco has the capacity to calculate deductions related to Difficulty of Care payments per IRS Notice 2014-7, should the State choose to accommodate this offering.

Palco processes all payments for judgments, garnishments, tax levies, or other related holds on qualified DCSW pay as required by federal or state governments immediately after payroll is generated. Palco tracks balances due on garnishments and voluntary deductions. When a garnishment is paid in full or Palco is notified by a third party to terminate a deduction, staff disable the deduction in our accounting information system. All documentation of authorizations to deduct and their terminations are kept in the DCSW's case file.

Each disbursement is coded to an expense account. Payments are offset against budgeted amounts. Remaining balances, calculated as the difference between budget limits and period spending, are displayed on each individual's account in real time for viewing in the Palco Connect system by Members/Representative-Employers and in the Palco Case Management Portal (CMP) for our internal support staff and state program staff.

Palco has a documented system, policies and procedures, and internal controls to ensure that DCSW pay rates and billable rates are accurate, as established by the State, in accordance with hourly pay and tax rates. We have protocols for quality assurance and payroll data testing of all impending pay rate changes.

## **√**4.2.1.69-4.2.1.81

# Payroll Tax Filings

As part of our FMS function, Palco will process all necessary\_employer\_tax\_filings, which\_include all federal, state and local requirements. We regularly conduct compliance reviews and monitor relevant quidance in the provision of consumer-directed services for compliance with federal, state, and local tax, labor, and workers' compensation insurance rules and requirements related to the employment of qualified DCSWs.

As mentioned, Palco is 100% CPA owned. As tax professionals, we have access to periodicals and tax training that our competitors do not. We remain current on all IRS, state, and federal changes that impact this industry because FMS is what we do. We hire CPAs and experienced accountants to form our FMS team because we know experience in accounting and tax is what makes an FMS trustworthy. We easily adapt to changes in federal and state tax, labor, and program rules and requirements, including IRS changes in reporting, forms, and procedures; federal and state Department of Labor overtime and wage reporting changes; changes in state workers' compensation insurance rules; and state consumer-directed services program policies and procedures. With each challenge we have faced, we have provided quality F/EA FMS and related support at vast cost savings while honing our expertise in the provision of consumer-directed services.

We obtain a FEIN for each employer by completing and filing IRS Form SS-4, Application for Employer Identification Number. The FEIN is transferred to IRS Form 2678, which is sent to the IRS with a request for appointment of agent. This allows the IRS to expect tax payments from Palco instead of the employer.

We also register each employer as an employer for state income tax withholding and state unemployment insurance (SUTA) taxes with the West Virginia State Tax Department and West Virginia Job Service/Unemployment program, respecti4vely. Relevant West Virginia tax identification numbers are retained with each employer's case file. Palco is also an enrolled electronic filer and payer for state income tax withholding and unemployment insurance tax with the West Virginia State Tax Department and West Virginia Job Service/Unemployment program.

Each time payroll is generated, all federal, state, and municipal payroll tax liabilities are recorded in the employer's case file at Palco and accrued until payment is due.

Both employer and employee FICA (Social Security and Medicare) and federal income tax withholding are paid in the aggregate via EFTS filing using Palco's separate FEIN and Palco's contact information after each payroll. Each quarter, IRS Form 941, Employer's Quarterly Federal Tax Return, is prepared with accompanying Schedules B and R.

- ▼ Federal unemployment tax (FUTA) is calculated based on the worker's annualized gross wages. and the FUTA wage base. FUTA deposits are made quarterly under Palco's separate FEIN and contact information via EFTS. IRS Form 940, Employer's Annual Federal Unemployment Tax Return, and accompanying Schedule R, is filed in the aggregate annually with our FEIN. (Schedule A is also provided during credit reduction years if applicable.)
- ✓ State income tax withholding (SIT) is paid monthly and reported quarterly on an individualemployer basis for West Virginia residents and qualifying non-residents 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.
  - o Quarterly and annual SIT reports are reconciled against our payroll tax general ledger and submitted to the West Virginia State Tax Department West Virginia State Tax Department, when required.
  - When applicable, reciprocity tax filings for non-residents are also filed.
- ✓ State unemployment tax (SUTA) is paid quarterly on an individual-employer basis with the employer's tax account number, as prescribed by the state, even when zero wages are reported on a quarterly basis. This is done using the WVUC-A-154, Contribution Report, and WVUC-154-A, Wage Report.
- Municipal taxes are deposited and paid to the appropriate authorities on time and in the format prescribed by the jurisdiction. These amounts are reconciled on a monthly basis.

These activities are managed through company-wide electronic checklists. All tax filings are retained in perpetuity. As part of our internal controls and quality assurance (QA) measures, we perform quarterly operations reviews of all key deliverables. We conduct monthly and quarterly QA assessments, selecting a sample size to audit payments made, such as tax deposits and filings, garnishment payments, refunds to the Agency, and any payments to vendors.

### **√**4.2.1.82-4.2.1.85

# Payroll Processing

Immediately after processing, direct deposits are sent to our financial institution. For payrolls that fall on a holiday, Palco issues payments a day early, when possible. We also run off-cycle payrolls for various reasons, including DCSW hardship or State/Palco error. In addition, we provide various reports to Palco program staff and external state staff each time payroll is run. Such reports list denied timesheets and payroll information, such as gross and net pay and withholding information. If a timesheet is submitted after the payroll deadline, individuals are not required to wait until the following pay period to receive funds; "off-cycle" pay is issued prior to the next payday. This helps mitigate financial harm to families and keeps individuals in compliance with Department of Labor requirements.

We have transitioned self-directing worker populations to a totally paperless payment method, with all payments being made via direct deposit. Palco has a documented system, policies and procedures, and internal controls to ensure that DCSW pay rates and billable rates are accurate, as established by the State in accordance with hourly pay and tax rates. We have protocols for Quality Assurance and payroll data testing of all impending pay rate changes.

Direct deposit paystubs contain information needed by DCSWs to understand their payment, including net and gross pay, withholdings, overtime hours/pay earned (if applicable), voluntary deductions, garnishments, and other payment related information. These paystubs are viewed by Member/Representative-Employers and their DCSWs in the Palco Connect portal. Palco staff and State program staff also view this information in our Case Management Portal (CMP). See an example of an EFT stub to a vendor in Figures 25 and 26 below.

Figure 25: Paper-Based Stub

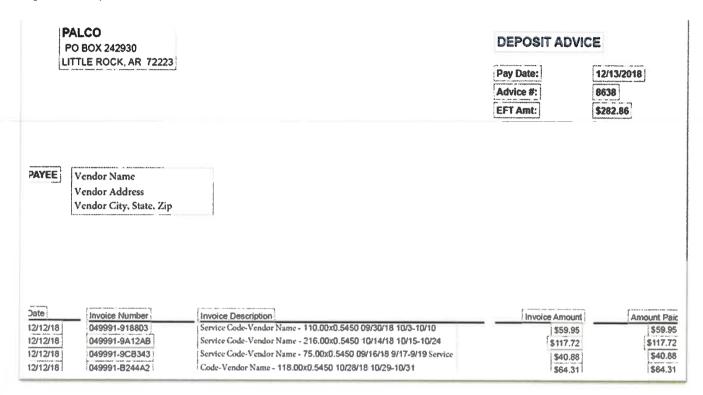
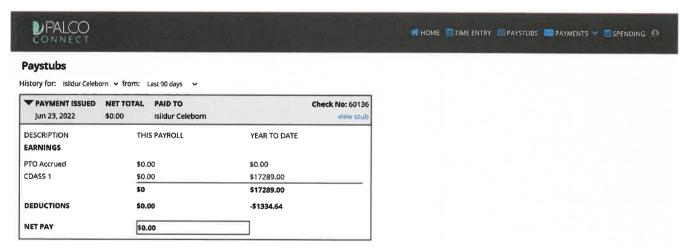


Figure 26: Online Paystubs



In cases where payroll checks are lost, stolen, or improperly disbursed, Palco issues a stop payment request within 24 hours. Stop payments are typically effective immediately; in a few cases, it takes up to 24 hours for Palco's bank to stop payment on a payroll check. In the rare case that direct deposits are issued improperly, Palco will reverse the funds on the account when possible. If not possible, a payment plan is established with the DCSW. All stop payments and reissuances are recorded in the Palco general ledger and can be viewed in our portal.



All payroll and payment methodologies identified above are documented in Palco's program-specific Operational Policy and Procedure Manual and are monitored through a variety of internal controls.

Our effective Disaster Recovery Plan outlines processes for generating payroll on the due date, even during times of inclement weather and unanticipated power or server failure. Should an issue arise, it will be communicated to the Agency within four (4) hours.

#### MONEY NETWORK CARD

In our experience, we find that direct deposit is the preferred method of payment for issuing DCSW payroll checks. Palco processes thousands of direct deposit payments concurrently with the capability to expand this number without limit. We encourage DCSWs, individual-directed goods and services vendors, and small unlicensed providers to receive their payroll checks/payments via direct deposit. as it reduces waste to the environment and eliminates delays in payment, thereby enhancing program performance.

We offer prepaid cards with Money Network, a Fortune 500 company with over 2.7 million active users. We chose them above competitors because their cards are accepted everywhere, and they have many added benefits that most other pre-paid card providers do not offer. We recommend utilizing these cards, as they have the following benefits:

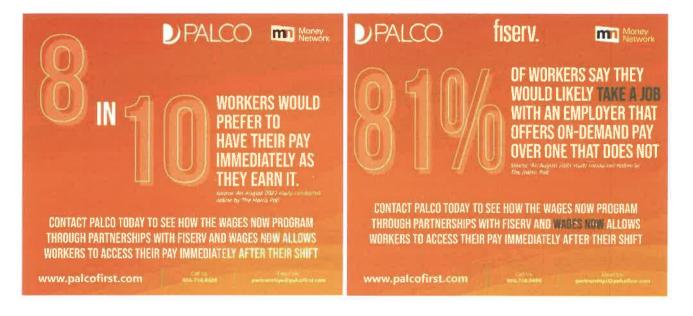
- Cardholders can access funds while awaiting their replacement cards.
- Cardholders have easy access to emergency funds.
- Cardholders have the option to "cash out" by receiving authorization for a check and protect against fraudulent activity.
- Checks are visible on cardholders' statements.
- Free mobile application and cardholder portal.
- Ability to use the cards at ATM locations nationwide.
- Includes free check cashing locations for consumer usage.
- ✓ 24/7 service support.
- Provides cardholders with a check option to pay bills or access funds if a card is lost or stolen.
- Fraud protection and FDIC-insured.
- Allows users to establish savings "accounts" under their cards.
- 24/7 online management system where users can login and see their balances, make transfers, and take other actions.
- No fees for use on regular purchases (not including foreign transaction fees, etc.).

These cards can be issued within 10 days of enrollment with payments deposited on the card within the next applicable pay cycle. In the meantime, payments will continue to be issued on the previous payment method.

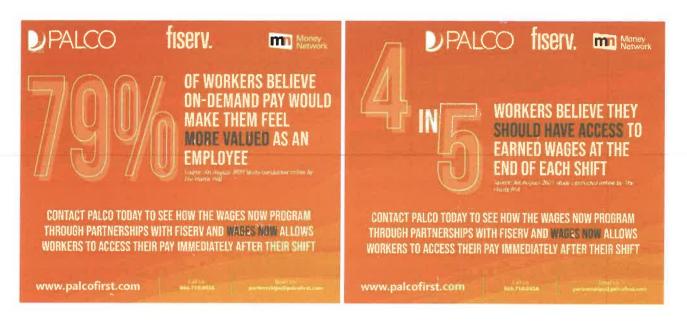
With Money Network cards, Palco can see where the funds are being deposited and, to some degree, utilized. Additionally, because the cards are used everywhere and are backed by Money Network, it eliminates issues with check clearinghouse vendors. For example, certain big box stores may not cash checks for clients, which results in families in need having to go without the goods they may need to support their independence. The Money Network Cards eliminate that.

#### PAY DIFFERENT: PROVIDING SOLUTIONS TO THE UNBANKED AND UNDERBANKED

According to the 2021 Federal Deposit Insurance Corporation's (FDIC) National Survey of Unbanked and Underbanked Households,3 "An estimated 4.5% of US households (approximately 5.9 million) were unbanked in 2021 and an estimated 14.1% (approximately 18.7 million) were underbanked. When the unbanked population was queried as to why, 21.7% cited that they don't have enough money to meet the minimum balance requirements."



<sup>3</sup> https://www.fdic.gov/analysis/household-survey/index.html



Palco has identified a resolution to eliminate this pain point for DCSWs who choose this solution. Through our partnership with Money Network, we can now offer the Earned Wage Access (EWA) benefit where DCSWs can immediately tap into their earnings after each workday, which changes the customary fixed payroll cycle and eliminates costly payday lending. This allows DCSWs to pay bills sooner, borrow less, and save more, alleviating stress from the debt cycles of payday loans.

#### A desirable benefit at no cost:

- ✓ No added fees for Members/Employers of Record or DCSWs.
- ✓ Integration with existing Palco time tracking systems.
- ✓ To-the-penny access to all funds via the patented Money Network Check.
- Integrated with mobile wallets.
- Person-to-person transfers at no cost.
- Expansive access points at in-network ATMs, check cashing partners and more.
- Comprehensive banking alternative with flexible access to funds.











#### What information will the State/Employer have access to?

The State/Employer will not have access to any information on the earned wages feature on the Money Network Card. This is a feature that is available on the Attendant's Money Network Card. Only the Attendant will have access to information related to their Money Network Card account. Neither the State nor the Employer will have the ability to see or know when an Attendant has requested or received funds early through the earned wages feature on their Money Network Card.

#### What happens on payday?

When an Attendant elects to access earned wages prior to payday, the funds they access or draw down are deducted from their upcoming paycheck.



### **√**4.2.1.86-4.2.1.87

## Tax Notices

Palco\_researches\_and\_resolves\_any\_tax\_notices\_received\_from\_the\_IRS,\_West\_Virginia\_State\_Tax Department and West Virginia Job Service/Unemployment program regarding DCSWs' tax liabilities/liens within ten (10) days of receipt. Notices are tracked by upper management to ensure timely resolution. We retain all documentation related to all electronic IRS and West Virginia tax filings and payments in the Subagent-F/EA FMS entity's file for easy retrieval in order to respond timely and effectively to notices.

#### **√**4.2.1.88-4.2.1.94

## End-of-Year Tax Processes

A VF/EA FMS entity must perform a number of year-end tax activities for employers as their agent. They include the following:

- Preparing and issuing IRS Forms W-2.
- Processing over-collected FICA refunds.
- Amending IRS Forms 941, as needed, to reflect over-collected FICA.
- ✓ Filing the annual 940/FUTA report and processing FUTA refunds.
- Filing appropriate state tax returns for SIT, SUTA, or municipal taxes.

#### PREPARING AND ISSUING W-2s

Prior to mailing out tax information in January of each year using Form WV/IT-103, we verify and update each Member/Employer of Record and their DCSW's address and phone number. We also verify that each DCSW's Social Security Number matches the name and date of birth information from Social Security Administration's Business Services Online.

IRS has specific instructions for VF/EA FMS entities to prepare and issue IRS Forms W-2 (Special Reporting Situations for Form W-2, Agent Reporting). Palco follows this procedure. A VF/EA FMS entity with an approved Form 2678, Employer/Payer Appointment of Agent, for a member must enter the following in Box C of Form W-2:

- ✓ (Name of agent)
- ✓ Agent for (name of employer)
- Address of agent (VF/EA FMS)

Each Form W-2 reflects our separate FEIN in Box B, and we file one Form W-3, Transmittal of Wage and Tax Statements, for all W-2s. Our information in Boxes E, F, and G of the W-3 are as they appear on our related IRS Forms 941. Individuals who are employed by more than one employer receive separate W-2s for each employer. We file all W-2s electronically due to the volume.

Palco sends Copy A of the W-2 to the Social Security Administration on behalf of the employer. Copy 1 is sent on behalf of the employer to file with state, city, or local tax departments, as required. Copies B, C, and 2 are sent to the worker on behalf of the employer, and copy D is maintained in the employer's file at Palco. Copies are available online as well.

As part of this process, the total gross payroll per Form W-2 must be reconciled to the calendar year's total gross payroll and each of the four 941 reports filed during the year.

W-2s and accompanying transmittal cover sheet are filed with state tax agencies as needed.

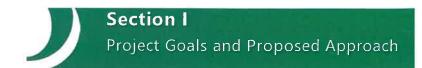
We also process and file IRS Forms 1099-Misc, Miscellaneous Income, when applicable, for independent contractors who earn more than \$600 in a calendar year, and IRS Form 1096, when not filing 1099-Misc electronically, with the IRS and WV Department of Revenue.

#### PROCESSING OVER-COLLECTED FICA REFUNDS

In some cases, a DCSW may not earn the FICA wage threshold (\$2,000 in 2017) in a calendar tax year. IRS can and often does update the FICA wage threshold for a particular calendar tax year.

Palco withholds FICA as required from the DCSW's payroll during a calendar year in anticipation of the worker earning the FICA wage threshold. When a DCSW does not earn the FICA wage threshold amount for a particular calendar tax year, we refund the employee portion of over-collected FICA to the eligible DCSW and the employer portion of over-collected FICA to the State or employer. Palco performs the following tasks to refund over collected FICA to eligible DCSWs and employers:

- Palco verifies and updates each employer and qualified DCSW's address and phone number. We also verify that each qualified DCSW's Social Security Number matches the name and date of birth information from SSA's Business Services Online.
- ✓ Palco then determines which DCSWs and employers may be eligible to receive a FICA refund and determines which calendar tax quarters that FICA was over-collected.
- ✓ Palco files an IRS Form 941-X for each quarter in which FICA was over-collected and attaches. a Schedule R that only includes employers who were impacted.
- ✓ The employer portion of taxes is either applied to the employer's account or returned to the State per the directives of the State. Palco works with programs that that choose either option, so we have processes in place for both methods.



✓ Annual reconciliations are uploaded to West Virginia state tax agencies as required.

The IRS requires that all DCSWs be issued a Form W-2 for each calendar tax year they work for an employer. Currently, the Social Security Administration (SSA) will not allow a VF/EA FMS organization to electronically file an IRS Form W-2 if the form reports FICA wages greater than zero but less than the FICA wage threshold for the calendar tax year. However, VF/EA FMS organizations that file 250 or more Forms W-2 must file electronically or be penalized \$50 per form filed in hard copy. Therefore, if FICA is refunded for a calendar tax year for a DCSW, FICA is refunded, the wages will be reported on the IRS Form W-2 as zero and the worker's Form W-2 should be issued to the worker and electronically reported to the SSA. Documentation related to FICA refunding is maintained at Palco.

#### **FUTA REPORTING**

Federal unemployment tax (FUTA) is calculated based on the DCSW's annualized gross wages and the FUTA wage base. FUTA is only owed to the IRS once the DCSW earns \$1,000 in gross annual wages for a single employer. Palco charges FUTA from the first paycheck, assuming all DCSWs will earn \$1,000 in wages for the year. All FUTA is deposited quarterly under Palco's separate FEIN and contact information via EFTS.

At year-end, employers whose DCSWs did not earn \$1,000 per year are entitled to a refund of overcollected FUTA. FUTA taxes owed and deposited are reported on IRS Form 940, Employer's Annual Federal Unemployment Tax Return, along with Schedule R. Should FUTA tax deposited exceed FUTA tax owed, a refund will be issued to Palco. We will then refund these amounts to the Agency/BMS.

A copy of this return will be supplied to the Agency by February 20<sup>th</sup> of each year.

### **√**4.2.1.95-4.2.1.96, 4.2.1.97.4-5

# Unclaimed Property

There may be cases where DCSW and vendor checks are returned to Palco because they are found to be undeliverable. In these cases, Palco staff will process these checks with the State in accordance with its Unclaimed Property Laws by voiding and issuing stop payment on the original check and then reissuing it to the State with an itemization of the parties and amounts to whom the payment belongs. Palco will maintain all documentation related to these cases in the applicable worker and/or vendor file at Palco.

## **√**4.2.1.97

# Vendor Payment Processing

Our cloud-based budget module was built to be entirely flexible to support each member's unique budget. Processing, issuing, and tracking approved member-directed services payments to vendors is no exception. Only the expenses specifically approved for the Member will be paid.

Prior to payment, we distribute, collect, and process IRS Form W-9, Request for Taxpayer Identification and Certification. When applicable, we will process the results of any IRS ruling related to a vendor's filing of 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 the vendor is an independent contractor.

We will process invoices and payments for Aged and Disabled and Traumatic Brain Injury Waiver Community Transition Services on approved Transition Plans.

In Kansas, New Mexico, and Pennsylvania, Members or authorized representatives can complete a Vendor Payment Request (VPR) form. After confirming with the State, we intend on using a similar process in West Virginia. The VPR form is provided by email or fax. For payments direct to the Vendor, the form must be accompanied by a quote or invoice. The Member or Representative-Employer must ensure in advance of submitting the VPR that the product or service is reimbursable. Our forms allow vendors to submit multiple dates of service, service authorizations, or even member requests. A copy of the processed VPR is maintained in the Member's electronic file. As an internal control, the check number and issue date are recorded.

Additionally, Palco's innovative and collaborative approach to meeting the members' needs goes beyond processing traditional vendor payments. Palco is experienced in online payment methodologies to provide a quick and cost effective solution to service delivery that includes the purchase and order of items shipped directly to the individuals store/home, purchasing and facilitating online payments for items like Uber and transportation tickets (bus, metro) and online submission ordering for employers to directly submit their vendor claims for items such as internet and phone bills approved in their plan. Through all of these different methodologies for receiving the services in a person-centered manner, Palco CMP provides visibility through online stubs and utilization management that is updated in real time.

Palco will verify, process, and pay for participant-directed goods and services based on an authorized invoice or receipt provided by vendors and supported by the Member's authorized Spending Plan, but no later than thirty (30) days after receipt. We also ensure that the vendors are qualified to perform the services prior to payment by reviewing their enrollment documents.



Once payment is made, the amount is deducted from the Member's Spending Plan. We will monitor Spending Plan expenditures. We will correct any discrepancies or reimburse the Agency for overpayments/underpayments, if any, and detail the credit on the next submitted claim within thirty (30) calendar days. Any returned vendor or small unlicensed provider payments will be processed according to the WV Unclaimed Property Laws. Unclaimed property information is stored in accordance with Section 4.2.1.95-4.2.1.96, 4.2.1.97.4-5 on page 77-78.

Vendor payment stubs display the invoice number and information related to the services that they performed. In some states, like New Mexico, large vendors provide services to multiple members. All members are invoiced on the same VPR. When Palco remits payment to the vendor, we itemize these invoices and members so that the vendor is able to easily reconcile payments without having to call Palco Customer Support. This practice has led to greater satisfaction among the vendor community in our states.

Palco can also provide online payment processing for Community Transition services and other services related to Money Follows the Person initiatives, as needed. Palco will ensure that claims for Community Transition Services payments are issued prior to the member's transition to the community to ensure there are no gaps or delays in service. Understanding the delicate nature of transitions and community services, Palco can work in collaboration with all stakeholders involved in a particular case to ensure a seamless delivery.

### **√**4.2.1.98-4.2.1.104

## Reports

We can customize any reports essential to maintaining program integrity and quality through tracking and monitoring. Reports will be generated monthly, quarterly, annually, or on an ad hoc basis and will cover all areas of FMS tasks as described in the contract. We look forward to the opportunity to work with State leadership to better understand how we can best meet your program needs through reporting.

We will prepare and distribute reports as specified by the contract. Reports can be sent via mail or email, or the Employer of Record may download them from our Connect portal. Such reports contain the following information:

- ✓ Name and ID of the Member and his or her Representative (Employer of Record), if applicable.
- Enrolled DCSWs to render services.
- Information about the budget.
- Payments made to DCSWs categorized by service type.
- Associated payroll and workers' compensation (when applicable) costs.
- Any overuse of units or funds for the period.





One feature we believe greatly assists Members/Employers of Record is their ability to use the budget utilization report to show their projected use and the estimated date that they will run out of funds or units.

Our web portal's business intelligence layer provides the ability for users to generate ad hoc reporting in real-time or for Palco to remit ad hoc reports within seven (7) days of request. This is done through the application and design of filters, which are grouped by users into a report builder. This allows users to essentially build their own queries with the use of available data elements to generate reports on demand. Palco provides information and training materials on this functionality.

We have a standard suite of reports available for our external partners in our Case Management Portal (CMP). These are accessible for all professional users 24/7, as on-demand reports.

Table 3: CMP Standard Reports

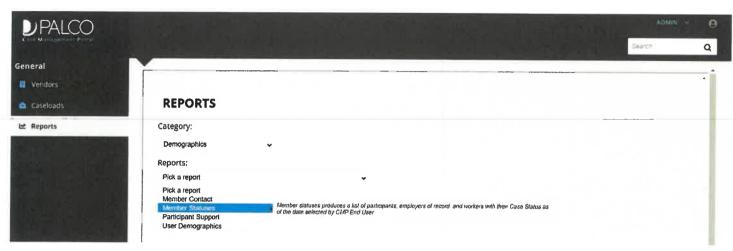
Standard Report Name	Description
Active Enrollments	The Active Enrollment report identifies CMP Members (Member,
	Worker, or Employer of Record) active during the date range specified
	along with their current Case Status. Users enter a role and a date range
	to see Members active during that time.
Authorization Report	Authorizations in CMP are specific services and goods budget
	categories. The Authorization Report allows end users to pull both

Standard Report Name	Description
	broad and refined lists of Authorizations from CMP. Congruent with the
	User's Role and scoped permissions, users may search for data across
	entire programs and with widely defined budget date time frames.
Employer Rate and	The Employer Rate & Registration report lists federal and state tax
Registration Report	rates, unemployment insurance costs, and workers' compensation costs
	for Employers. These rates are applied to worker wages based on
	program, state, and federal requirements.
EVV Registration	The EVV Registration report provides a list of workers and details about
	the worker's EVV compliance. It shows if the worker is required to use
	EVV, and if so, how they submit their time. It is particularly useful in
	gauging overall compliance and narrowing down workers who are out
	of EVV compliance.
Member Contact	The Member Contact report shows current contact information for
	Members, Workers, or Employers of Record. Palco maintains physical
	and mailing addresses, email addresses, and phone numbers.
Member Statuses	Member statuses produce a list of members, representative-employers,
	and direct-care services workers with their Case Status as of the date
	selected by the CMP End User. Member statuses help CMP users
	understand which Members are currently active, inactive, or pending. It
	shows how long a case status has been in effect and helps CMP users
	review historical statuses.
Missing Timesheets	The worker Missing Timecard report provides a list of active workers
	who did not submit a timecard for a specific pay period.
Member Support	The Member Support report lists all members within a program and
	their immediate support within that program, be that a Palco Counselor,
	Enrollment Specialist, or other support role.
Payables Register	The Payables Register lists payments and reimbursements to Vendors
	for services and goods different than timesheet and timecard entries. It
	includes all payments within the service date range selected, including
	those in progress and rejected. The report includes Member, Employer,
	and Payee IDs and Names, the service and cost, the Payable's present
	status, and additional reference information.
Payment Method	The Payment Method report identifies how Workers, Members, and
	Employers are paid, if they receive paper checks or electronic deposits
	for funds sent to them. Account details are not displayed.
Payroll Register	The Payroll Register report shows information about what was paid to
	workers on a given pay period, including deductions and exemptions
	and the payment method. CMP Users can specify a date range for
	inclusion, as well as limit results to a specific Member or Worker. This
	report produces summarized pay information and calculates gross
	wages overall.

Standard Report Name	Description
Payroll & Tax Info	The Payroll and Tax Info report displays rates, exemptions and other statuses that affect a worker's Payroll and Tax withholdings. The report includes factors affecting pay, such if the worker is exempt from Overtime pay and Difficulty of Care.
State Date Report	The Start Date Report shows two types of Start Dates. It shows the original date that a Member (Member, Employer, Worker) started in a Program, and it also shows a 'Restart' date, which is the most recent date the Member became active again. The Restart date is shown whenever a Member, Employer, or Worker's profile has changed from
Timesheet Report	Active to Inactive and back to Active.  The Timesheet Status report gives CMP users the ability to see the bigger picture and overall progress of timesheets within a Program. It also gives CMP users shift level specifics across a range of workers, employers, and participants. This report lets the user narrow down results listed by Timesheet status. In doing so, the user can isolate timesheets with concerns or that need action such as Worker or Employer review. If the timesheet failed, the reason for that failure is identified.
User Demographics	The User Demographics report shows essential and basic information about Members, Employers of Records, and Workers. This report identifies the name, relevant IDs, current Case Status in CMP, gender, zip code, and date of birth of the Member listed. Workers on the list also show their relationship and shared dwelling status with participant.

Part of what makes Palco's development and ownership of its own cloud-based software stand apart from its competitors is its ability to adapt and cater to individual program needs as well as the continual updating and improvement of the software. One example is our tooltip feature for users to take advantage of when they run reports. When a user hovers over the reports from the dropdown menu, they will see a tooltip giving a brief description of the report and the information it will deliver. See Figure 27.

Figure 27: Tooltip



Palco looks forward to reviewing this standard suite of reports, readily available in our Case Management Portal for the Agency/BMS program staff and Case Management professional users to query on-demand, 24/7. These reports meet many of the reporting needs outlined in the contract. Palco currently supports the data requested in the program-specific reporting requirements outlined in the RFP. Examples of these program-specific reports are outlined below.

Table 4: CMP Program Reports

Report Name	Description
Dedicated Payroll Bank Accounts	Copies of the monthly bank statements from the dedicated payroll accounts can be provided within <b>15</b> calendar days of the request along with any other financial information necessary for the Agency to oversee the Subagent-F/EA FMS.
Discovery and Remediation Report	Provided to the Agency <b>one (1)</b> week prior to scheduled contract meetings based on identified performance measures.
Financial Reports	Quarterly and year-end financial reports provided to the Agency within <b>45</b> calendar days.
Spending Report	An up-to-date monthly report provided upon request to members who do not have access to the internet within <b>five (5)</b> business days following the end of the payroll period that includes the last day of the month.

Palco ensures that copies of information and reports are not distributed to other parties without the written permission and direction of the Agency.



## **√**4.2.1.105-4.1.1.107, 4.2.1.112

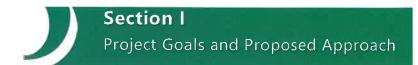
# Document Retention & Data Security

Palco engages or exceeds industry standards for storing and disclosing PHI, including copies of timesheets, phone logs, summaries of complaints with resolution noted, documentation related to the withholding, filing, payment of federal and state tax, wages, and year-end tax filings in compliance with federal and state Department of Labor rules. We are committed to reducing waste and harm to the environment; therefore, we store all member, DCSW, and F/EA FMS files electronically.

- ✓ All records are kept for at least seven (7) years for possible IRS review and as long as necessary if they are related to a matter currently being addressed with the IRS.
- ✓ Records must be kept three (3) years per United States Department of Labor (DOL) requirements.
- ✓ The U.S. Citizenship and Immigration Services (CIS) requires that the USCIS Form I-9, Employment Eligibility Verification and Instructions be retained three (3) years after the worker is hired or one (1) year after the date the employer or worker terminated employment, whichever is later.

All procedures are documented in our Policies and Procedures Manual. Additionally, our master checklist ensures that we are saving all required documents appropriately, including archived records. This checklist is available for Agency review.

The database maintains and records member Protected Health Information (PHI) on a daily basis. Data stored in the database is current, based on updates received from the Department's fiscal agent and the Contractor's payroll and invoice processing systems. After a review by our CIO, Director of Software Engineering, Privacy Officer, and legal counsel, we can assure that our technology not only meets the highest level of HIPAA security requirements, but also meets the West Virginia Information Technology Accessibility security standards and guidelines.



### **√**4.2.1.108-4.2.1.109

# HIPAA Requirements

Palco, Inc. uses, discloses, and safeguards Protected Health Information (PHI) in compliance with the Privacy and Security Rules under the Health Insurance Portability and Accountability Act (HIPAA) and Health Information Technology for Economic and Clinical Health Act (HITECH) of 2009, as well as state law, rules, and regulations.

For secure and HIPAA and HITECH Act compliant electronic storage and management of individual and worker files, Palco utilizes a digital storage/document management system. Not only is the information stored for legal retention, but it is also used daily for active, working files and is structured to resemble a basic filing cabinet. Permissions for confidential information are only granted to those who need the information to complete their jobs effectively. Palco staff's level of access to protected health information is limited to what is minimally necessary to perform assigned duties. The classes and categories of protected health information to which staff can have access are based on workforce classification.

As such, access to the system is controlled down to the page level. Once a user logs into the application, the system associates the user with a group that restricts the level of security access rights. Documents and folders are monitored and protected individually, despite user actions. Data is physically separated per contract serviced.

Access to shared data is authenticated and authorized based on criteria such as role(s), programs, or individual claims on a per use level. External users are required to provide a valid email address which acts as the UserID. They are also required to provide a strong password that would give them access to only their personal information. These passwords are b-crypt hashed at the application level before being transmitted to the authentication database. Their account may go inactive after a duration of inactivity or as part of an internal workflow process.

All data is secured at rest and in flight. Data and data submissions are encrypted according to industry standards. No PHI is transmitted through non-HIPAA compliant networks or services. We maintain strict security protocols for our computer and backup systems, exceeding industry standards for storing and disclosing protected health information. Palco's infrastructure complies with Federal Information Processing Standards 200.

All computers and data servers are secure, contain virus protection, and have installed security patches. Our email is secure. All web-based applications employ security certificates and encryption protection.

All hardware is password-protected with essential backups stored at an approved off-site location. Imaging servers are maintained in a physically and environmentally secure atmosphere with powerconditioned spaces, accessible to personnel with appropriate security clearances only. All images are backed up daily and copies are stored offsite in securely locked facilities indefinitely.

To protect our data, the following controls are in place:

- Access to data, application, and system functions by users and support personnel. All individual user access to the member and provider portal is authenticated and authorized based on criteria such as role(s), programs, or individual claims.
- ✓ Issuance, management, and maintenance of unique UserIDs and passwords. External users are required to provide a valid email address during the enrollment process, which acts as the UserID. They are also required to provide a strong password that gives them access to only their personal information. Users have the ability to change their UserID or password through each of the web services they may have access to. For security, accounts may become inoperable after a period of inactivity or be inactivated as part of an internal workflow process. All passwords are b-crypt hashed at the application level before being transmitted to the authentication database.
- ✓ Formal user registration and de-registration for granting and revoking access to information systems and services. Once a new user is established in the system, a registration email is sent with a uniquely generated PIN and link to the registration page. The user uses the PIN, last four digits of their SSN, and last name to begin portal registration. An email confirmation is sent with a link to complete registration and enable system access. The user management portal can be used to manually activate or de-activate accounts. De-activation can also occur as part of an automated internal workflow or by the user wishing to close the account. Time-limited read-only system access is maintained in some instances to provide access to historical records and tax forms.
- ✓ Mechanism for restricting and controlling access and privileges to only authorized functionality and/or services. Accounts are created with specific roles or a combination of roles and access claims.
- ✓ Locking user accounts upon multiple failed login attempts. Accounts are locked after four failed log-in attempts for a period of 15 minutes. Additionally, log-in attempts are rate limited to prevent brute force attacks. Audit logs are maintained detailing all log-in activities.
- ✓ Password reset validations. Forgotten passwords can be reset via the password recovery. process. The account UserID is entered, an email is issued, and the user follows a link to the change password screen via a time-limited encrypted token. We require strong password requirements for security with multiple character types and length definitions.

All system access is monitored and written to audit logs. Email alerts are dispatched to support staff regarding certain security events, such as account lockouts. All user generated database transactions are logged to audit tables.

All staff are required to undergo training on HIPAA and HITECH confidentiality requirements upon hire and annually by our Privacy Officer. Personnel also sign a confidentiality agreement. We have a robust HIPAA Privacy and Security Manual. This manual not only covers data and security protocols, but also includes information about disclosure, providing PHI to authorized requesting parties within five (5) days of a request, and amending PHI within 30 days of the request.

Staff who know or suspect a privacy or security issue must report it immediately to the Privacy Officer, who will assess the situation and determine the appropriate disciplinary action, which, depending on the severity of the issue, can range from a verbal warning to termination. All issues will be disclosed to the department within one (1) business day, and Palco will implement appropriate and immediate remediation and notification efforts to rectify the situation, including sanctions for the staff or subcontractor responsible, if necessary.

Palco has staff specifically assigned to ensure we are up-to-date and have the latest information pertaining to our scope of work and we remain fully compliant with all applicable state, federal, and local rules, and regulations. Palco subscribes to several services to possess the most current information, visits key websites on a regular basis, attends sponsored events and trainings (webinars), and belongs to several strategic memberships and associations relevant to the key deliverables to F/EA FMS services.

### **√**4.2.1.110-4.2.1.111

# Business Continuity/Disaster Recovery

Palco has a comprehensive Disaster Recovery Plan (DRP) for restoring and preventing loss of data, software, master files, and hardware if management systems are disabled. A copy has been provided as **Appendix 7**. Our DRP includes objectives to meet the following provisions:

- Preventing the loss of the organization's resources, such as hardware, software, data, and other information technology assets.
- Minimizing downtime related to information technology.
- Minimizing downtime of the Customer Support Center.
- Ensuring continuation of critical business practices in the event of a disaster.
- Ensuring that a secondary location meets all Palco policies and ensures business continuity.
- Protecting and securing all data.

Palco has established a separate, dedicated site in the event the DRP is activated to ensure the timely return to regular operations without interruption of data and use of appropriate software that is completely up to date as the previous day's work. The cold site has the capability to meet all Palco's policies, ensuring efficient production of key tasks.

All data is stored and/or backed up to the Google Cloud Platform (GCP). Cloud based data (GCP) and backup information is stored in data centers and replicated across multiple regions - all inside the United States. We conduct daily tape backups of our electronic files and data as a localized data backup and restoration method (in case of total failover of all GCP data centers). Backups of internal servers are completed to both on-site storage and off-site cloud storage. When current software is upgraded, or new software is installed, a backup of any pertinent data is stored at a secure external site outside of a 50-mile radius and inside of a 100-mile radius. Thus, current and archived files are stored externally in a secure location.

All physical software program disks are stored off-site. Off-site computers are located with utilized software. All computers stored off-site are protected by password and other operational integrity mechanisms to ensure proper authorization has been granted for access to computer files. This prevents the loss of information and any interruption in service if a disaster strikes.

Our system's architecture, network diagram, and related frameworks are supported by documented IT governance policies. Our IT infrastructure includes a firewall appliance that keeps internal voice and data segregated from external traffic through a DMZ. Cloud-based software is further segmented through an additional virtual firewall and DMZ in the cloud.

In the event of a regional GCP outage, the entire application ecosystem is scripted and will be manually redeployed to an unaffected region with minimal downtime. Palco has chosen this design strategy so that the application uptime will target 24-hour availability, 7 days a week. Our cloud-based software system is built so that any system maintenance there would have little to no impact on our GCP uptime.

Any internal system maintenance that might require downtime would be scheduled during periods of low traffic, such as the weekend or a holiday. Users are notified through in-app messages one (1) week in advance of scheduled maintenance detailing the reason, projected start time, and duration.

The DRP is included as a part of our new staff onboarding and training. We provide staff with a copy of the DRP and orient them to its provisions. At least quarterly, the Palco management team reviews and tests the DRP and makes any necessary updates or revisions. Testing includes walkthroughs, simulations, parallel testing, and full-interruption testing. The Human Resources department distributes and communicates any changes to the plan to the staff. Our staff are cross trained in a variety of tasks. In addition, we offer robust instructional materials for carrying out key tasks. If many of our staff were unavailable, other staff members could readily fill in, and we would bring in temporary staff who would be rigorously trained to carry out key functions. If staff are prevented from carrying out their essential functions at our primary location, we have the following provisions in place:

- ✓ Working with the team leader and other team members to understand the magnitude of the disaster.
- ✓ Implementing Palco's policies for setting up a temporary call center and other operational. departments at a secondary location.
- ✓ Training workers on how to carry out essential functions in a secondary facility, as well as on what information to provide parties who inquire about the disaster recovery and Palco's response.
- Executing Palco's communication plan as developed by the communications team and Primary Team Leader.

Palco maintains a secondary location if our primary location becomes unavailable.

The secondary site contains computers that are protected by password and other operational-integrity mechanisms, as well as virus and malware protection, to ensure proper authorization has been granted for access to computer files.

- ✓ Each worker has a unique identification and password to enter computer workstations and software. Each worker's security level determines their access to computer files.
- ✓ Backups are in the cloud in real time and all systems are capable of cloud-based computing.
- ✓ All data is backed up with appropriate failovers to ensure continual business functionality.

Our phone system has soft phone capability to run from a secondary site as a customer service center unit or from remote locations. As our Customer Support Center is equipped with silent monitoring, full quality assurance protocols are ensured, no matter the location of our customer service representatives.

Our online web portal allows staff to work in remote locations when they are unable to come to work due to disaster, illness, or other circumstances. VPN functionality also allows them to access their work desktops and server and cloud data files, as well as important software.

Palco's IT staff maintains a set of backup laptops equipped with Microsoft Office and other relevant programs on standby for issuance in anticipation of events which may otherwise impact daily operations, such as inclement weather.

Servers are connected to an uninterruptable power supply system (UPS), which conditions incoming power to the server and provides sufficient processing time for the server to be correctly shutdown in the event of a power failure. In the event of sufficient damage to the primary operational site, a second location is on standby to accommodate the necessary network traffic to keep operations running with little to no downtime.

As a secondary solution, we conduct weekly full backups and daily incremental backups of our files. These backups are kept off-site and are easily restored so staff can continue their work. We may also use analog phone lines and equipment in such a catastrophe.

We have a comprehensive Business Continuity Plan (BCP) for continuity of operations of all services covered in the event of a disaster. An example of our existing Business Continuity Plan is included within the Disaster Recovery Plan in Appendix 6.

### **√**4.2.1.113-4.21.129

## **Terminations**

In the event that an employer is no longer a permanent employer (e.g., the member appoints a new designee employer, or the member serving as her own employer terminates the program), Palco immediately terminates their case status in our system. Taxes are paid in accordance with Section 4.2.1.69-4.2.1.81.

After ongoing taxes are filed, we will perform the following tasks:

- Revoke the IRS Form 2678 with the employer.
- ✓ Receive the IRS revocation confirmation letter (LTR 4228C).
- Revoke the IRS Form 8821 with the employer.
- ✓ Retire the employer's FEIN at year-end once W-2s are filed. Should the employer be deceased, the IRS is notified of this fact.
- Revoke any state power of attorney or authorization forms established through the West Virginia tax agencies, West Virginia Department of Taxation and Bureau of Employment Programs.
- Retire the employer's West Virginia income tax withholding employer tax account number.
- Retire the employer's West Virginia state unemployment insurance tax employer tax account number.
- Retire the employer's West Virginia municipal tax employer tax account number.
- Compute, withhold, and file final state income tax taxes (even when the final filing is zero wages).
- Deposit final state income tax, including zero wages.
- Compute, withhold, file, and deposit final state unemployment taxes, including zero wages.
- Terminate any local tax accounts using the agency's prescribed methodology.
- ✓ Palco will continue to file W-2s for the employer at year-end.

We will maintain documentation and correspondence related to each of these activities in the employer's archived file.

This process is tracked in our online system in case of IRS error or other matters that may impede agency approval. Reports are generated to display where an individual lies in the enrollment or termination process. Employers and Service Facilitators may be granted access to their real-time enrollment information through the portal.

In some instances, Palco may need to adjust either timesheets or employee payments. Adjustments made to payments happen when Palco pays an employee that claims all hours through an unreportedhospital stay. When Palco receives the weekly hospitalization reports, Palco reviews the report for unreported hospital stays; if an overpayment has been determined on an active member, a reduction in hours is made to the following pay period to cover the over-payment. In instances that the member is disenrolled, Palco will notify program staff of overpayment. Timesheets are also adjusted based on reported hospital stays and eligible days of service. When a hospital stay is reported, the enrollment specialist removes the days that are not eligible for pay. Hours will be adjusted down when the timesheet is received to prevent overpayment.

Timesheets are also adjusted if there is a change in the member's active status. When an active or disenrolled effective date falls in the middle of the service period, funding for days that are not eligible for pay is refunded back to Medicaid. Days prior to an effective start date are not eligible for pay, and days after a disenrolled date are not eligible for pay.

## **√**4.2.1.130

# Collaborations with Stakeholders

Palco coordinates and communicates its role, responsibilities, and activities as the Subagent-F/EA FMS Vendor with Case Managers, Utilization Management staff and Claims Payer staff so that all required procedures and forms are completed and processed to ensure that members do not experience disruptions in service. The Palco CMP system provides professional users with a transparent location for all processes and tasks completed by the Subagent-F/EA FMS Vendor. The work queues and task tracking ensure that external staff with a vested interest in a task's completion can monitor it in the queue and independently obtain its status at any time. Should questions arise requiring communication beyond what is visible within the system, Palco staff will coordinate and facilitate to ensure all parties involved get a satisfactory resolution and disruptions to services never happen.

Palco employs multiple mechanisms for communication with members and program stakeholders, as we know how critical information sharing can be. Some of the methods available at our immediate disposal for communication with stakeholders include:

- Communication via phone.
- Website newsfeeds and banners for alerts.
- Customizable email notifications and eblasts.
- Social media campaigns.
- ✓ In-person town hall and 1-1 meetings.
- ✓ Webinar-based town hall meetings.
- Customer service support lines including chat.
- Automatic system alerts and notifications.
- Mail campaigns.

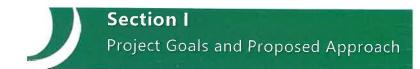
### **√**4.2.1.131

# Online Registry

Palco currently owns and operates an online provider directory with a singular mission of connecting members in need of care with DCSWs seeking to provide care. The workforce crisis plaguing our industry is a focal point of Palco leadership that we are passionate about combatting. We know all too well that even though self-direction is often the most quality and fulfilling service delivery model, recruiting and maintaining qualified DCSWs can be a challenge for members due to the schedules, lack of full-time hours, and privacy laws that prevent the sharing of information. Our online registry breaks down those barriers by creating a path and acts as a catalyst to make healthy connections within communities.

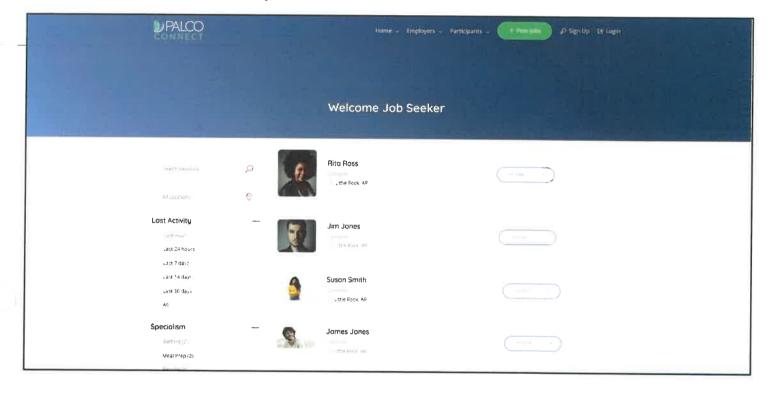
The Palco provider directory provides space for DCSWs to create a profile and market their services, as well as a mechanism for members seeking care to publish their job descriptions and attract fresh support. DCSWs seeking to provide care can enroll on the site and complete a verification process for their profile to become active. This quality measure helps keep the directory up to date with only serious candidates and prevents false information from being posted. Within the directory, DCSWs can receive messages and screen job opportunities. Members can filter the DCSW pool by zip code/mile radius, ensuring the search results yield true candidates in their area. Members can also filter the DCSW pool by skill set to help them as well as helping target certain qualified applicants when a specialized task or set of tasks is being sought after.

Regular site monitoring and quality assurance checks keep information up to date and ensure the directory is maintained as a usable and quality resource. As Resource Consultants and the enrollment staff interact with DCSWs, they will inform them of the tool and encourage DCSWs to sign up. Palco will work with the Agency to tailor and customize the tool with other features and benefits that stakeholders may find useful. Palco will promote the tool through a variety of media



to ensure it is a well-known and shared resource. This includes social media, blog posts, marketing print materials, and educational webinars/videos. This targeted effort will help combat DCSW shortage and ensure the WV program members have a viable option for getting their needs met.

Figure 28: Palco Online Provider Directory



## **√4.2.1.132**

# **Quality Reviews**

Palco will participate in annual quality reviews conducted by the Agency or its contractor for each program using a quality review tool and web-based systems approved by the Agency.

As part of our internal controls and quality assurance (QA) measures, we perform quarterly operations reviews of all key deliverables. We conduct monthly QA assessments, including a 15% sample of key operations. Some examples include, but are not limited to:

- Completion of employer enrollment paperwork.
- Completion of DCSW enrollment paperwork.

- ✓ Completion of employer enrollment activities, such as obtaining a FEIN and assigning. appointment of agent.
- Completion of DCSW enrollment activities, such as background checks.
- ✓ Completion of employer termination activities, such as revoking a FEIN and IRS and state. appointments of agent.
- ✓ Timesheet review status, including following a timesheet life cycle from submission to payment.
- Payroll payments made.
- Other payments made, such as tax deposits and filings, garnishment payments, refunds to the Department, and any payments to vendors.
- Bank activity, including payments and deposits.
- Call center activity, including call monitoring and metrics analysis by agent.

Quarterly, the following additional information is also assessed:

- Filing of quarterly IRS Form 941.
- SUTA tax filings and payments.
- ✓ FUTA tax payments.
- ✓ HIPAA, Privacy, and Security compliance assessments.
- ✓ IT Security assessments.
- Disaster Recovery Test results.
- ✓ Filing of annual IRS Form 940 (Fourth Quarter review only).
- ✓ Filing of annual IRS Forms W-3 and W-2 and state counterparts (Q4 review only).
- Filing of any annual state income tax withholding reconciliation reports (Q4 review only).

For example, enrollment of member/representative-employers and DCSWs can be a cumbersome and lengthy process, and we strive to mitigate that through analytics. Thus, to monitor this process, we utilize the following:

- An electronic checklist to log key dates and events, follow-up activities, and receipt of forms.
- Benchmarking standards related to average time between the referral and enrollment.
- Monthly case review of pending enrollments and enrollment statistics.
- Incorporation of any changes to the enrollment process based on data trends.

Palco understands and will abide by the performance standards set by the state in the contract. Palco's web-based system tracks utilization for each individual and allows users to access this usage and remaining hours or dollars as applicable. In addition, this system monitors the enrollment process and the status of all individuals to ensure proper access is granted to all parties. If a DCSW has been terminated, for example, they are no longer able to enter time past the date of termination. We will



submit quarterly and/or monthly expenditure/utilization reports to each member. These reports are available for download in the portal, as they provide real-time transparency to allow all parties to verify that Palco is accurately tracking services and utilization.

In addition, Palco's system accomplishes the following tasks:

- ✓ Notification to Resource Consultants, State staff, and others when the Member's needs or information have changed.
- ✓ Monitor compliance with the Fair Labor Standards Act and all other applicable federal and state laws, as well as department policies and/or protocols, regarding workers' compensation, overtime, and overtime pay, including services delivered in a back-up capacity.
- Adherence to timeframes for enrollment, completion of paperwork, and initiation of services.
- ✓ Name and contact information for the assigned Case Manager, State Case Manager, and Resource Consultants, including alerts when one of these assigned individuals changes.
- ✓ Information about the individualized service plan and service utilization.
- Authorizations and other important information received from the State.
- Results of Resource Consultant visits and outcomes, including monitoring activities and service agreements for workers and representatives, ensuring that all timeframes are met to get service agreements in place.
- Monitoring payments to DCSWs.
- Providing narrative information about the performance of DCSWs.
- Notifications regarding the member's health, safety, condition, and wellbeing.
- Tracking time worked by each worker to ensure that all overtime rules are being followed.

Additional quality checks occur during routine face-to-face visits in the home setting, as well as regular outbound phone calls. These will allow our staff to glean important information, as well as the dynamic between the member and the DCSW, if services are being delivered as reported on the timesheet, if the member's needs have changed, and if the health, safety, or wellbeing of the member is threatened in any way.

For each service we perform, we assign quality measures to ensure that we are meeting targets and objectives. For example, enrollment and initiation of services are monitored closely. We understand that many families experience difficulties in hiring the right DCSW to care for their loved ones. A cumbersome or lengthy enrollment process only complicates this. To monitor this process, we utilize the following:

- ✓ An electronic checklist to log key dates and events, follow-up activities, and receipt of forms.
- ✓ Benchmarking standards related to average time between the referral and enrollment.
- Monthly case review of pending enrollments and enrollment statistics.
- Incorporation of any changes to the enrollment process based on data trends.



All quality control records are available to the state upon request. For any deficiencies in our services, we will submit a corrective action plan within 10 business days that includes the following:

- Description of the findings.
- Specific steps to correct the situation.
- Name(s) and title(s) of responsible staff person(s).
- Timetable for performance of the corrective action steps.
- Monitoring that will be performed to ensure that corrective action steps are implemented.
- Signature of our project manager or a senior executive.

### **√**4.2.1.133-4.2.1.136

# Communication System

Our comprehensive customer support system includes the following:

- ✓ Policies and procedures that reflect the principles of participant self-determination and the Department.
- ✓ 24-hour dedicated toll-free phone number and toll-free fax machines with expandable capacity.
- ✓ Live staffing of a toll-free telephone system from 8:00 a.m. to 6:00 p.m. EST, Monday through Friday, except on state and federal holidays. Ninety-five percent (95%) of calls will be live answered.
- ✓ Automated call distributor system (ACD) to manage and assign incoming calls to available staff in an efficient manner.
- ✓ IVR-automated response to caller inquiries and timesheet and payroll inquiries 24 hours per day, 7 days a week.
- ✓ Voicemail box activated for after hours and during peak hours for callers who would prefer to leave a message. The voicemail is integrated with our ACD system. The voicemail has sufficient capacity to allow callers to leave a detailed message, have an outgoing message recorded in both English and Spanish, and provide prompts to remind callers to leave their name, telephone number, identification number, and the best time to return their call.
- Voicemails are returned in 24 hours.
- 24-hour web-based information regarding FMS services.
- Secure email and fax capacity.
- ✓ 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.

- ✓ An operational TTY/TDD line, at no cost to the caller.
- ✓ Access to written and spoken translation and interpreter services at no charge to the caller. Our call center has Spanish-speakers on site and utilizes a third-party service for all other languages. This service currently serves nearly 300 languages. Translation services are engaged through a warm transfer by calling Palco. Once we identify translation is needed, we patch in the translator and remain on the line during the entire call. This keeps the caller from having to make an additional call.
- ✓ All of our information is available in alternate print formats (e.g., large print and Braille) and in languages other than English. We also provide interpreter services (i.e., American Sign, and services for persons with Limited English Proficiency), as needed.
- ✓ State-of-the-art equipment to prevent bottlenecks in daily operations.
- ✓ Provide a greeting message and educational or informational messages approved by the Department while callers are on hold.
- ✓ Continual monitoring of secure emails, faxes, and phone calls.
- ✓ Ensure compliance with Medicaid confidentiality procedures/policies, including HIPAA requirements, within the call Center.
- ✓ Call center software that receives and tracks calls and provides data analysis.
- Maintenance of inbound and outbound calls, requests, and complaint logs.
- ✓ Respond to all calls from members and representative-employers within one business day.
- ✓ Maintenance of inbound and outbound calls, requests, and complaint logs and tracking of complaints.
- ✓ Resolving F/EA FMS-related complaints and grievances within five (5) business days of receipt.
- ✓ Preparing and submitting monthly reports to the Department outlining complaints received and resolutions achieved.
- ✓ 24-hour operational voice messaging system.
- ✓ Customer Relationship Management (CRM) tool to identify issues and trends and respond to items within 24 hours.
- ✓ Act as a mandatory reporter of fraud and abuse including having a system for reporting critical. incidents.
- ✓ Website with general information and a case management portal with log-in access to view upto-date information. These systems are monitored through an internal control process to ensure the accuracy and effectiveness of the systems.
- ✓ Policies and procedures that emphasize the philosophy of self-direction and cultural and linguistic competence to communicate effectively with a diverse population of individuals of all ages with disabilities and chronic conditions.
- ✓ Our IT infrastructure includes a firewall appliance that keeps internal voice and data segregated from external traffic through a DMZ.



Option for transfer to EVV vendor on ACD menu, as well as ability for live agents to transfer callers to partner EVV vendor.

To maintain a person-centered approach, our call center is staffed with live and local representatives, who have the skills needed to address concerns and provide a range of solutions or additional training. Palco staff has developed trusting relationships with many members, employers, employees, and case managers, fostered over many years of resolution, by treating callers with respect and courtesy.

All telephone staff treat all callers with dignity and respect, are knowledgeable of Consumer-Directed Services and related West Virginia Medicaid policies and protocols, and can communicate effectively with a diverse population of individuals of all ages with disabilities and chronic conditions. Call center staff greet the caller and identify themselves by name when answering. All communications respect the caller's right to privacy and confidentiality.

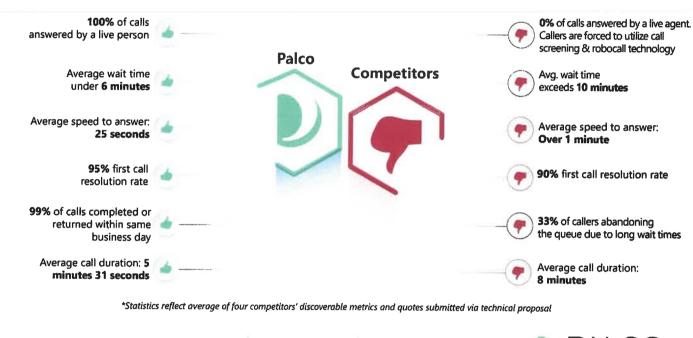
Agents are trained to resolve any issues callers might have, including the following:

- Enrolling individuals or engaging in a pre-screening qualification protocol.
- ✓ Introducing callers to program details and assisting individuals in understanding procedures related to self-direction.
- Providing orientation on employer requirements and conducting employer skills training.
- Explaining the role of budgets, including payroll taxes for workers and goods and services for program members.
- Assisting callers with timesheet completion.
- Offering assistance in completing enrollment, employment, and tax forms.
- Assisting individuals in understanding expenditure reports.
- Providing information on W-2s and over-collected FICA.
- Answering payroll-related inquiries, such as payment schedules and direct deposit change information.
- Detecting and reporting potential fraud, abuse, or neglect.

We are proud of our ability to meet or exceed industry standards.

Figure 29: Customer Service Comparison

### THE RIGHT SELECTION COMPARING FOR SELF-DIRECTION **CUSTOMER SERVICE**



www.palcofirst.com

Call Us: 866,710,0456

Email Us: partnerships@palcofirst.com



Palco believes that it offers the best quality and value in every area, including our customer support capabilities. Our Client Relations Management (CRM) tool allows call tracking and reporting including an electronic record to generate a synopsis of all calls and to provide a complete audit trail of communication to the Customer Support Center from all parties. Additionally, we have the capability to structure the IVR in a manner that allows calls to be monitored by a third party for the purpose of evaluating call center performance.

Our internal reports for contract management include all measures of contract performance, including the following:

- 100% of all inbound and outbound calls are documented and maintained in our CRM.
- Fully operational and accessible agents during the timeframe required by the contract.
- 95% of monthly inbound calls are answered within 3 rings or 15 seconds.
- 100% of voicemails, callback requests, and inquiries are returned within one (1) business day.
- Abandoned calls do not include dropped calls.

- Monthly abandoned calls represent 5% or less of incoming calls, regardless of queue placement.
- ✓ Call queue wait time does not exceed five (5) minutes, regardless of queue placement.

We will provide detailed weekly, monthly, quarterly, and annual cumulative data to the State if requested. Data will reflect trends using tables, charts, or graphs. Our typical suite of reports includes the following data points:

- Number of incoming calls.
- Number of outbound calls.
- Number and percentage of calls received by subject.
- Number of calls routed to voice mail.
- Return call requests.
- Percentage of calls returned within one (1) business day.
- Number and percentage of answered calls.
- Average speed to answer.
- Average and maximum talk time.
- ✓ Number of outbound calls (voice and IVR automated).
- Number and percentage of calls abandoned, average time to abandon, maximum abandonment times.
- ✓ Number of calls in the queue, average queue wait time, maximum queue wait time.
- Number and percentage of first call resolutions.
- Number and percentage of escalated calls beyond the customer service representative.
- Number of individuals requesting specialized assistance.

We are proactive in addressing issues. During a call surge, we route 100% program surge calls to 80% of Customer Support Representatives. Our response time is outstanding, earning us high marks from our existing partners. According to a 2020 Customer Satisfaction survey, Palco received a 98% approval rating from Employers and 97% from Employees on the programs that we serve.

The following charts, Figures 30-32, reflect all Palco's Customer Support Center's average talk time, incoming, and outbound calls from January 2019 through November 2022. Our outbound call volume demonstrates we are committed to returning phone calls and following up with users who need additional support.

Figure 30: Average Talk Time by Month/Year (All Programs)

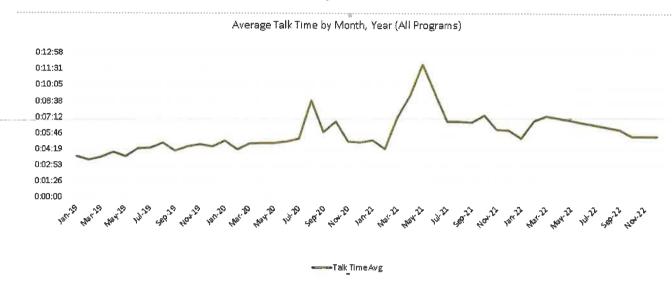
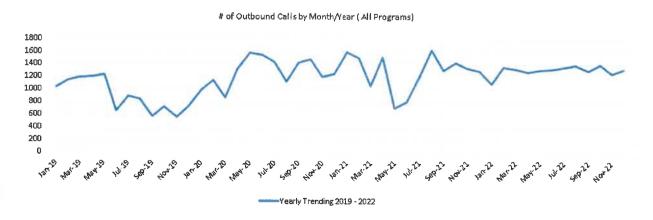


Figure 31: Incoming Calls by Month/Year (All Programs)



Figure 32: # of Outbound Calls by Month/Year (All Programs)



#### **COMPLAINTS AND GRIEVANCES**

Palco tracks all calls received, including complaints, using the tools described in the previous section. We respond to complaints from Members/Representatives and their DCSWs within one (1) business day and make every effort to resolve complaints/grievances within three (3) business days of receipt. We track all activities related to complaints and resolve F/EA FMS related complaints and grievances. We provide monthly reports to the State program staff outlining the complaints received and the resolutions, highlighting any themes presented and proposing strategies for addressing them, as appropriate in the future.

Palco welcomes expanding an effective tool for conflict resolution including an advisory/grievance committee that engages stakeholders either in person or via teleconference on the basis prescribed by department program staff. A responsive FMS demonstrates its commitment to transparency and quality through the following mechanisms:

- Stakeholder engagement practices, such as a task force of Members, Employers, Caregiver/workers, and other users of the FMS to address quality concerns.
- Having a team on the ground in West Virginia to provide technical assistance.
- Providing live call center representatives.
- Establishing accessible channels for members and their circle of support to communicate suggestions to the FMS and methods for Palco to provide feedback to stakeholders.

Our CRM tool is a cloud-based tool that allows communication tracking and reporting including an electronic record to generate a synopsis of all communications and to provide a complete audit trail of communication to and from all parties. With data consolidated in our CRM, it makes it possible to analyze patterns for call drivers and insights into member needs and wants. With this tool, we can monitor our Palco Customer Support Center staff's productivity and improve their customer relationships. Additionally, we have the capability for structuring the communication log to include actions taken, escalations, mandated reporting, and the date of final resolution.

To maintain a person-centered approach, our Customer Support Center (call center) is staffed with live representatives who have the skills needed to address concerns and provide a range of solutions or additional training. Technical assistance occurs via phone, voicemail, email, and chat features on social media channels. Palco staff has developed trusting relationships with a wide range of Members/Representatives, their DCSWs, and other stakeholder groups, fostered over many years of resolution by treating callers with respect and courtesy that reflect the principles of the department.

Providing culturally and linguistically competent customer support is an integral component of the philosophy of consumer-direction and the provision of consumer-directed services. Palco invests heavily in providing a variety of options to diverse populations of all ages with disabilities and chronic condition when they are seeking information and assistance.



## **√**4.2.1.137-4.2.1.138, 4.2.1.141

# Incident Management

Palco-Resource Consultant staff will identify, through the use of tools including CRM, cases of substandard performance on the part of a member or representative, or a member of staff from Subagent F/EA FMS. In such cases, we notify impacted parties (e.g., member/representative and/or the Agency) of the substandard performance, providing appropriate remedial skills training as appropriate, assisting the member/representative to develop and implement a written plan of correction to address the area(s) identified for correction, monitoring the successful implementation of the corrective action plan by the member/representative, and informing the Agency 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, the following:

- Repeated or intentional incorrect reporting and/or late submission of DCSWs' hours worked.
- ✓ Incorrect and/or late submission of vendors' invoices for participant-directed services. (PDGS, EAA, etc.).
- ✓ Hiring of ineligible DCSWs.
- Monthly or cumulative overutilization of the member's individual budget.
- Ineffective emergency DCSW back-up plan.
- Inappropriate firing of DCSWs.
- Failure to comply with the waiver programs' policies and procedures.

Critical incidents occurring in an HCBS setting include unexpected death, suspected physical or mental abuse, theft, financial exploitation, severe injury, medication error, sexual abuse, and any other type of abuse or neglect.

All critical incidents that occur to the member will be reported to the state, as required by the program, by Palco within 24 hours of witnessing or discovering such incident. Palco will also contact Adult Protective Services (APS), Child Protective Services (CPS), or law enforcement in accordance with state law. Critical incidents relating to members under department programs will be relayed to the department's investigator hotline within four (4) hours of specified incidents. All events will be reported per the Agency's protocol.

Additionally, Palco will respond to and investigate allegations. If required, the member and other responsible parties are contacted to determine whether the individual who committed the alleged incident should be terminated or removed. In some cases, it may be necessary for the safety and wellbeing of the member to remove an individual, particularly when the allegations are substantiated,



and Palco will communicate that to the member. When this occurs, Palco will assist the members in finding a replacement. All activities are reported to the State.

For abuse and financial fraud issues, Palco, Inc. acts as a mandatory reporter to the appropriate state agency. Our system is designed with a multitude of controls in place to ascertain quality for individuals in this program along with their DCSW. Fraud is a crime and abuse violates other applicable laws and administrative rules. Both undermine the integrity of the program. Any serious or repeated grievances made by a member or a member's worker is reported within 24 business hours to the Agency.

### **√**4.2.1.139

## Employer Handbook / Initial Orientation Materials

Palco has a company compliance and policies handbook that covers the unique aspects of being a self-directing member/representative-employer. The **Employer Manual** is an introductory guide to the program, policies, procedures, and the mail functions of being a self-directing employer. The manual will be approved by the Agency before distribution. An example of our Arkansas Employer Manual can be found in **Appendix 5**.

The manual will include information about the participant-directed services, the role, responsibility and function of Subagent-F/EA FMS and the role and responsibilities of the member, representative and DCSW. Detailed instructions and information regarding member/representative employer-related tasks are explained and documented.

Palco has a dedicated training department and staff that oversees the creation of training materials and will work closely with the Resource Consultant team to educate, train, and assist Members/Representative-Employers, DCSWs, and Agency staff regarding health care tasks and much more. The training supervisor and learning management team will assist with the development and updating of a Member/Representative-specific Employer Handbook that will be approved by the Agency and provide all necessary information about participant-directed services and roles and responsibilities of all involved parties. To maintain a flexible and person-centered training approach, we offer several training options:

- ✓ IN PERSON LEARNING: Palco will have regionally based trained staff located strategically across the state of West Virginia to meet the one-to-one needs of stakeholders by facilitating training in the homes of individuals. Speed, content, and delivery styles are tailored to meet the needs of each learner and ensure maximum absorption of key concepts and information.
- ✓ GROUP TRAINING: At times, individuals may benefit from group-led training to promote collaborations and allow for meeting settings in the community. Palco will execute group

training as applicable within the communities at locations such as the library, community centers, and senior resource locations.

WEBINARS: Palco utilizes the GoTo Webinar training platform for the development and delivery of all webinar-based training. The platform provides the Palco training department and staff with several features and benefits that enhance the training experience including customizable audience sizes, engaging polls and surveys, email integrations, reporting, and analytics. Training registrations are tailored to specific topics and audiences. Additionally, the GoTo training suite includes access to a platform for the storage of video tutorials and a learning library. Live trainings are recorded and stored for users to access later/time that is convenient to them.

To assist all program roles, Palco has developed several educational tools to assist in disseminating information. We call our framework for this the "Self-Direction Tool Kit." See Figure 33 for the tool kit which has three (3) types of tools:

- Main Tools
- Specialty Tools
- Extra Tools

Figure 33: Palco Self-Direction Tool Kit



Main Tools are comprised of items that guide the framework and overall curriculum for training and on self-direction. These items include:

- **Employer Manual** an introductory guide to the program, policies, procedures, and the mail functions of being a self-directing employer. This is used for initial certifications and employer changes. See Appendix 5 for an example.
- Support Coordinator (Resource Consultant) Manual (Orientation and Skills Training Guidebook) - an internal supplemental guide to the Employer Manual that the Support Coordinator uses to guide the way they teach the information. It may be used as a script, if needed, while support coordinators are learning to fine tune the details of their educational rhetoric. See Appendix 5 for a Support Coordinator Manual example.
- Support Coordinator (Resource Consultant) Administrative Handbook a company compliance and policies manual that covers the unique aspects of the position. Topics like time management, home visit safety, strong documentation practices, and managing a caseload are all covered. For an example of the Support Coordinator Administrative Handbook, see Appendix 5.

Specialty Tools, or companion guides as they are often referred to, are used as needed to provide support or enhance someone's knowledge of the consumer-directed program based on a specific topic area. These resources should provide the knowledge base for a Support Coordinator to provide 1-1 support to a Member/Employer of Record but also serve as a written resource to be provided via email following the conclusion of a visit. Some of these specialty tools include:

- EVV Companion Guide includes all training resources, frequently asked questions, user guides, and links to recorded videos to help ensure the Employer understands the requirements to comply with the Electronic Visit Verification mandate and ensure they have everything necessary to train their caregivers/workers to follow the mandate. (Sample of this companion guide is included in Appendix 5)
- Recruiting Companion Guide includes resources and guidance on how to recruit and hire qualified DCSWs. This resource includes information on writing a good job description, posting a job ad, interviewing tips, checking references, and making an offer. It also provides an overview of the steps to get enrolled with Palco and working with the Palco Enrollment team. See **Appendix 5** for an example.
- Employee Management Companion Guide provides an overview of typical tasks associated with employee management and tips for being successful. Some of the topics include performance reviews, training, scheduling, developing a corrective action plan, and terminating a worker. An example of this can be found in Appendix 5.
- Budget Management Companion Guide provides a concise refresher of the budgeting plan, what services are allowable, and the budget methodology information. For an example of the Budget Management Companion Guide, see Appendix 5.

- ✓ Fraud, Waste, and Abuse Companion Guide a reiteration of the employer manual covering. this essential information. Appendix 5 is an example of our Fraud, Waste, and Abuse Companion Guide.
- ✓ Program Compliance Companion Guide covers all common program rules and policies that are unique and critical to the West Virginia consumer-directed program. This tool is typically used to address issues that come up with program compliance and corrective actions. We provided an example of the Program Compliance Guide as Appendix 5
- ✓ Connect Reports Companion Guide provides detailed instructions for employers to view spending/utilization and payment details on-demand via the Palco time entry system, called Connect. See **Appendix 5** for our Connect Report Instructions.

Extra Tools are beneficial resources, not used as often or in every situation, but exist to provide program members with the maximum amount of support and guidance. Some of these optional templates include:

- ✓ Payment Stub Companion Guide a "how to read your paystub" resource for Workers. See Appendix 5 for the Payment Stub Companion Guide example.
- ✓ Health Care Emergency Card Template for Members to document their personal health information in case of an emergency. See Appendix 5 for an example.
- ✓ Program Enrollment Process an overview of how to enroll in the self-directed program. (Sample of this excluded from APPENDIX 5)
- ✓ Backup Care Quick Decision Tree a resource to help plan for and document backup care if a worker does not show or an emergency happens. For a Backup Care Decision Tree example, see Appendix 5.

In addition to the tools mentioned above, we also provide these training resources:

- Virtual Tutorials and Library. The Palco training library is comprised of a variety of topicfocused information that is accessed on demand 24/7. Some videos are short in nature, covering a very specific topic such as reading a paystub while others may be longer to cover a more extensive process such as completing and submitting an entire enrollment packet.
- CMP Sandbox Training Environment. A live CMP Sandbox training environment mirrors reallife test scenarios and daily workflow processes. The sandbox version of our Case Management Portal (CMP) updates with production upgrades and product releases so that the two environments are synchronized. Palco's professional trainers conduct engaging, hands-on training using this sandbox environment to train dedicated State program staff as well as members and their employees throughout the state of West Virginia. While leveraging expert knowledge of adult learning theory, the features of CMP are demonstrated interactively. New and existing users acclimate themselves to the CMP environment without the risk of harming live production data.



These training resources will be maintained collaboratively between the Palco West Virginia Agency and our Leadership Team to ensure the resources contain the most up-to-date information. We believe if we provide the resources, we can educate, inform, and assist in making the lives of consumerdirected members a little bit easier.

# **√**4.2.1.140

# Satisfaction Survey

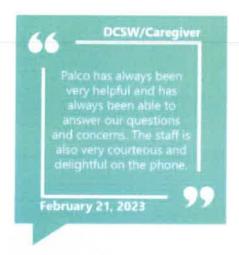
Palco will work alongside the Agency to perfect and administer satisfaction surveys to all program stakeholders on a schedule and format mutually agreed to. Palco will ensure results are compiled into an annual report approved by the agency. We will collect information on the following topics for the annual satisfaction survey:

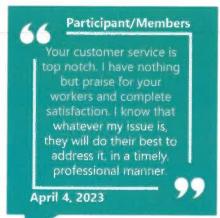
- Satisfaction with employer orientation and skills training, and any annual training(s).
- Satisfaction with Palco Resource Consultant interactions.
- Satisfaction with tools/resources provided by the Palco Resource Consultant.
- Satisfaction with Employer responsibilities, including first payroll.
- Confidence in Employer roles and responsibilities.
- Any additional comments/requests for additional training or support.

Palco currently administers customer satisfaction surveys following interactions with staff. Beyond the customer service team, feedback is also solicited following interactions with enrollment, program staff, and resource consultant staff. All survey results are reviewed by the customer service team and senior leadership through a quarterly and annual report. Should an individual request follow up regarding their feedback, Customer Support management completes outreach and assists with a plan to remedy any issues. Any themes in the data and areas for improvement will be identified and a plan of correction will be established to improve the customer experience. Remedies like retraining, staff meetings, security improvements, and resource development are all things Palco leadership can execute quickly.

Figure 34: Palco Testimonials

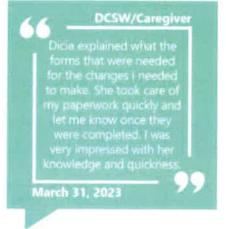
# What are people saying about Palco?















Annual satisfaction surveys demonstrate 98% satisfaction, with most respondents giving Palco a 100% performance rating across the board for customer service, accuracy in payroll processing, and responsiveness.



# **√**4.2.1.142-4.2.1.144

# **Customer Support**

# **CUSTOMER SUPPORT CENTER**

Palco's professional Customer Support team maintains a high level of performance and creates a great customer service experience through effective training. We know that delivering positive experiences matters. Onboarding and training of staff follows a vetted training schedule and curriculum checklist to ensure every worker is educated on key concepts and program specifics vital to the success of their position.

Upon award, Palco will establish a dedicated West Virginia-specific queue which will be operational Monday through Friday from 8:00 am to 6:00 pm, EST exceeding requirements. Our voicemail system will be active for after-hours. All calls, including any abandoned calls recorded, will be returned within one (1) business day. Hold messages and prompts will share important program details and reminders to help inform members/representatives and their DCSWs of key topics and reminders. Palco will accommodate the need for interpreter and translation services through the use of our language line resource later explained. We will ensure our customer services operation is compliant with all laws and requirements as indicated by the Agency.

Our customer support center is staffed with local subject matter experts with an extensive program background and operational understating. Training for customer support staff includes but is not limited to:

- Product and service knowledge, including an understanding of the consumer-directed service delivery model's core principles, person-centered thinking, and program-specific policies.
- Palco's tools and how the information is connected across each tool, including Palco's Case Management Portal (CMP), Enrollment (Intake), Timesheets (Connect), CRM tool, and AuthentiCare.
- ✓ Communication Skills.
- Soft skills.
- Organization and time management.

Palco has an established Customer Support Center that effectively serves the diverse population of Members/Representatives and their workers, in an efficient manner.

To maintain a person-centered approach, our Customer Support Center (call center) is staffed with live representatives who have the skills needed to address concerns and provide a range of solutions or

additional training. Technical assistance occurs via phone, voicemail, email, and chat features on social media channels. Palco staff has developed trusting relationships with a wide range of Members/Representatives, their workers, and other stakeholder groups, fostered over many years of resolution by treating callers with courtesy and respect that reflect the principles of the department.

Providing culturally and linguistically competent customer support is an integral component of the <u>philosophy</u> of consumer-direction and the <u>provision</u> of consumer-directed services. Palco invests heavily in providing a variety of options to diverse populations of all ages with disabilities and chronic conditions, especially when they are seeking information and assistance.

### **CUSTOMER SUPPORT**

Palco will exceed the requirements outlined in the RFP by offering all the necessary Customer Support services to provide support to program members.

We operate a TTY/TDD line and provide access to written and spoken translation and interpreter services at no cost to the caller. Our Customer Support Center has Spanish speakers onsite and utilizes a third-party service for all other languages. This service currently provides access to nearly 300 languages. Translation services are engaged through a warm transfer by calling Palco. Once we identify that translation services are needed, we patch in the translator and remain on the line during the entire call. This keeps the caller from having to make an additional call to access this service.

Information is available in alternate print formats (e.g., large print and Braille) and in languages other than English. We also provide interpreter services (i.e., American Sign, and services for persons with Limited English Proficiency), as needed.

We provide a greeting message and educational or informational messages approved by the State while callers are on hold. We leverage this feature when rolling out new initiatives, system features, or state policies to serve as a reminder to the caller.

We will maintain a program-specific website with helpful information for program stakeholders as well as pertinent forms. This information is available 24/7 on our 508-compliant palcofirst.com site. Our comprehensive customer support system includes the following:

- ✓ Live staffing of a toll-free telephone system from 8:00 a.m. to 6:00 p.m. EST, Monday through Friday, except on state and federal holidays. Ninety-five percent (95%) of calls will be live answered.
- ✓ 24-hour dedicated toll-free phone number and toll-free fax machines with expandable capacity.
- ✓ Operational TTY/TDD line, at no cost to the caller.
- Access to written and spoken translation and interpreter services at no charge to the caller. Our call center has Spanish-speakers on site and utilizes a third-party service for all other languages.

- State-of-the-art equipment to prevent bottlenecks in daily operations.
- ✓ 24-hour operational voice messaging system.
- ✓ Mandatory reporting of fraud and abuse with a system and process for reporting critical incidents.
- ✓ IT infrastructure complete with a firewall appliance that keeps internal voice and data segregated from external traffic through a DMZ.
- ✓ Option for transfer to EVV vendor on ACD menu, as well as ability for live agents to transfer callers to partner EVV vendor.

Palco's Director of Customer Support currently has a staff of 13 Customer Service Representatives, one (1) Team Lead and one (1) Supervisor who perform a variety of activities, such as receiving inbound calls, placing outbound calls, training, assistance with consumer-directed program enrollment, and other support activities. Our Director of Customer Support serves a core role in ensuring customer service needs are met.



"I would like to let you know what a pleasure it was to talk to Palco. I have been so impressed with their attitudes, disposition, and obvious interest in my problems and questions. Palco has gone way above and exponentially beyond in not only helping me to correct and resolve issues. They always made sure that I completely understand what or where the issue and/or confusion is, so whenever I am working on anything pertaining to my situation with Palco, I can do said action in the future without making the same mistake repeatedly."

-Linda S. from Colorado (Used with permission)

### A NEW WAY TO GET IN TOUCH

The Palco Support Center is no longer the standard "call center" of old. Our new multichannel GoTo Contact Center supports phone calls, SMS text messages, web chat, social media, and video. This provides options for members to customize the way they receive support, via their preferred channel. Our Contact Center makes it easy to meet the customers where they are and is cloud-hosted for flexibility and ease of use.

Not only does our live GoTo chat feature create an easier contact method for customers, it also boosts our customer service team's productivity.

### **FIVE BENEFITS OF GOTO CHAT:**

- Live chat saves customers the hassle of making a phone call.
  - Some clients do not have time to get on the phone. Long wait times, confusing menu navigation, disconnected calls, and sometimes even call transfers are needed.
  - Email, the traditional alternative, can delay a response to time sensitive issues.
- Live chat reduces repetition by creating a written record.
- Live chat increases productivity, allowing Palco agents to multitask.
- Clients can be more productive throughout their day. Rather than waiting on hold, unable to go anywhere or complete other tasks, a client can leave the chat open in the background of the computer or phone and go about their day.
- The chat feature allows the live agent to turn the communication into a phone call if needed.

#### **TOPICS OF CONVERSATION INCLUDE:**

- ✓ Timesheet status.
- Enrollment update.
- Electronic Visit Verification Support.

Live chat offers the best of both worlds, allowing clients to message with help agents in real time while still going on about their day, unburdened by lengthy delays and complex telecommunication systems.

Live chat from GoTo allows Palco to engage in chat through SMS/MMS from a mobile phone, Webchat message, or Facebook message.

# **ADDITIONAL FEATURES:**

- ✓ With the live chat feature, the Palco customer service agent can quickly transform a chat into a phone call and can initiate a shared browser navigation with a customer if needed for extra support.
- A survey is added to the Palco chat queue to assess the experience that our customers are having with our agents. This survey can be shared with a specific teammate or Palco leadership for quality assurance.

# **STAFFING**

Palco's staff is what sets us apart from our competitors. We take the time to recruit the best candidates for each position and invest resources in comprehensive training to provide the best outcomes for our clients.

We foster relationships with each of our partners and believe this is key to a program's success. We do this by always being accessible and engaging with our partners. Palco will designate a subject matter expert, known as an Account Manager, to serve as a single point of contact for state personnel and a liaison for technical assistance for department staff. This individual is dedicated solely to this project, answering any questions, and addressing any issues in a timely manner. This contact is available daily via email or phone, always giving the State a direct line to Palco. The Account Manager is available to the Customer Support Team as well.

All Palco staff are required to undergo criminal background checks, Medicaid exclusion checks, and other abuse registry checks upon hire. We conduct E-verify and other checks to ensure that all staff are legally authorized to render services under applicable federal and state law and/or regulations. We have the ability to bring in staff from other areas of the call center as needed. We will ensure that all staff are cross-trained and can access all West Virginia-specific materials as needed to answer calls.

This strategy enables us to employ skilled staff who understand our expectations as opposed to temporary staff who may otherwise be disengaged from our mission. We will submit our staffing plan changes to the state annually and as necessary. Figure 35 below gives a visual representation of this staffing via our Customer Support Center organizational chart.

Figure 35: Customer Support Organizational Chart





# **DIRECTOR OF CUSTOMER SUPPORT**

The Director of Customer Support is responsible for the overall operations of the call center and has over 30 years of experience providing customer support services. The Director provides strong leadership and oversees and determines key strategic direction and objectives of the Customer Support team while driving necessary changes for the improvement of operating and organizational efficiency. The Director of Customer Support reports directly to the Chief Operating Officer.

# **CUSTOMER SUPPORT SUPERVISOR**

The Customer Support Supervisor is responsible for the day-to-day operations of the call center. The Customer Support Supervisor plans, directs, manages, and evaluates subordinates' performance while developing and promoting productivity standards, ensuring customers receive prompt, high-level professional and courteous service. It is essential for the supervisor to establish and maintain positive relationships with customers through effective communication and conflict resolution methods. The Customer Support Supervisor is responsible for establishing cooperative interdepartmental relations and coordinating customer support activities with other internal functions. The Customer Support Supervisor reports directly to the Director of Customer Support.

# REMOTE CUSTOMER SERVICE REPRESENTATIVE (CSR I/II/III)

A Home-Based Customer Service Representative is the primary customer facing Palco worker who assists individuals with self-directing Medicaid services in the home as well as the workers serving those self-direction members. The Customer Service Representative is knowledgeable of specific rules and qualifications of the programs Palco supports. Using their knowledge of products or services, as well as great customer service skills, the Representative promptly and accurately addresses issues and provides support and information to ensure customer satisfaction. They also maintain extensive knowledge of company systems and sensitive information/PHI handling procedures. Customer Service Representatives are responsible for handling 20 – 40 inbound and outbound calls daily, with the ability to determine needs and provide a one call resolution. This position requires the ability to work Monday – Friday from 7:00 am – 6:30 pm CST. The Customer Support Representative reports to the Customer Support Supervisor.

# **TEAM LEAD**

This is the advanced grade in the Customer Support Representative staffing model and requires vast customer support experience. Incumbents of the grade are typically assigned the more complex and difficult customer support issues, are expected to work independently, and assume higher responsibility for researching customer issues. Workers in this grade are also expected to provide instruction/guidance/training to Customer Support Representative I & IIs.



# **CSR III**

This Senior Customer Support Representative position provides critical services to key business associates, giving the utmost customer-focused assistance, and is a vital partner on our team. Individuals in this position deliver specific delegated tasks assigned by a Customer Support Supervisor. Incumbents of the grade are typically assigned the more complex and difficult customer support issues, are expected to work independently, and assume higher responsibility for researching customer issues. Workers in this grade are also expected to provide instruction, guidance, and training to Customer Service Representative I & IIs. A senior representative performs research to respond to inquiries and interprets policy provisions to determine the most effective response, and it provides tier II support to third party customers as defined in the contract.

# **CSRII**

This grade is normally filled by advancement from the Customer Service Representative I grade or when filled by external hires, and it requires prior experience. A Customer Service Representative II works under general supervision and within the framework of established procedures and is expected to perform a wide variety of customer support activities with limited instruction or assistance. Individuals should exhibit adequate performance at this level, requiring a knowledge of departmental procedures and precedents, and the ability to choose among alternatives in resolving customer issues. They provide customer service training to new workers and have the ability to clearly explain enrollment and payroll processing practices to customers. A Customer Service Representative II is expected to work productively even in the absence of a supervisor and analyze customer information to determine needs while working towards a one-call resolution.

# **CSRI**

This is the entry level grade in the Customer Support staffing model. This entry-level role provides a strong foothold into our organization. Incumbents of this grade perform a range of customer support work that does not require prior experience. Generally, additional assistance is required in performing tasks. Individuals in this grade are expected to provide a basic level of support commensurate with their knowledge, skills, and abilities. Customer Service Representative I's are normally considered to be in training and as assigned responsibilities and breadth of knowledge increase with experience, it may be reasonable to expect promotion to the next higher grade.



# **√**4.2.1.145-4.2.1.149

# Case Management Portal

# CASE MANAGEMENT PORTAL & WEB-BASED SOLUTION—

Palco's Case Management Portal® (CMP) is one reason we are the best FMS partner in the sector. Palco's customizable cloud-based CMP is constructed from the backbone of 25 years of providing FMS to the consumer-directed population. Our software solutions are tailored to this industry and can be tailored to the specifications of the West Virginia programs. Our CMP streamlines enrollment, service authorizations, EVV, payroll, claims processing, and reporting in one easy-access tool.

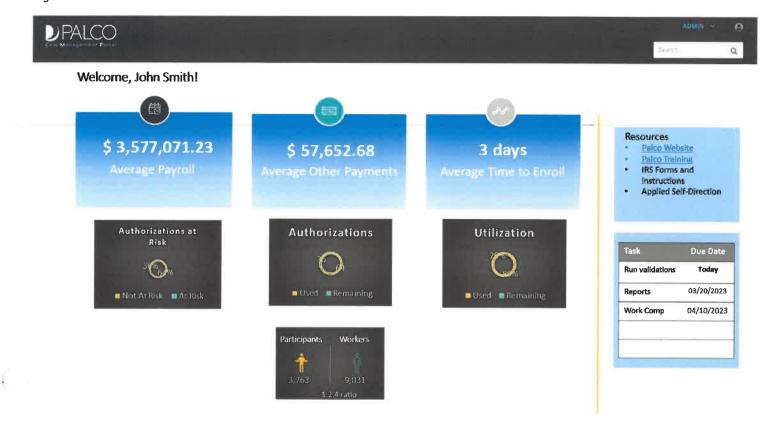
Our cloud-based system is built to make a complicated system simple with real-time reporting, dashboards, and 24/7 access. Features work together to support all aspects of this RFP, including:

- ✓ Cloud-based FMS system with real-time reporting, customizable dashboards, and 24/7 secure, remote access. See Figure 36 below for a dashboard view.
- Near-zero downtime (for system maintenance).4
- Processing invoices and payments to vendors.
- Applying different SUTA rates for each Worker, supporting individual tax rates.
- ✓ Ability to support various budget allocation logic monthly, daily, annual.
- ✓ Ability to run frequent Medicaid eligibility checks on all members (active and inactive).
- Processing payroll and vendor payment requests in accordance with the programmatic rules.
- ✓ Ensuring that we are not billing the Agency in advance of participant-directed vendor services.
- Reporting features:
  - o Ability to view paid and denied timesheets, and reasons for denial.
  - Ability to view budget utilization by member.
  - o Ability to view historical (worker) payment details, including paystubs.

Our Case Management Portal (CMP) provides a comprehensive beginning-to-end detailed view of case information. It is a significant part of the Palco solution, and we believe a brief introduction to the CMP suite will provide a preliminary understanding to build upon throughout the rest of Palco's response. Palco offers customized dashboards for users of the online system to see reports upon login. A sample dashboard is provided below.

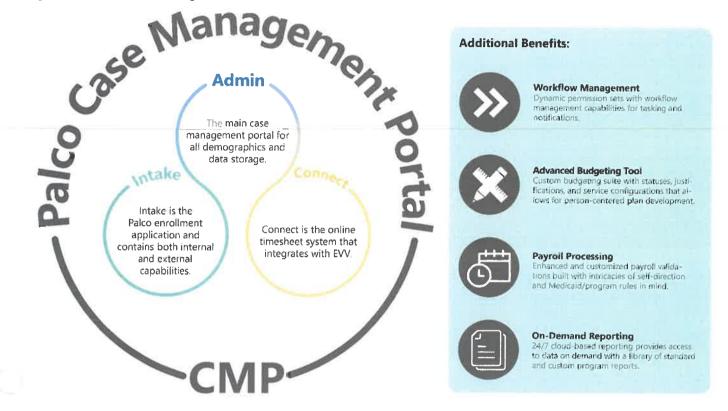
<sup>&</sup>lt;sup>4</sup> Palco will notify the Agency within one (1) business day of becoming aware of any interruptions, delays, or errors regarding the payroll process and payments to members' vendors.

Figure 36: Customizable Web Portal Dashboard

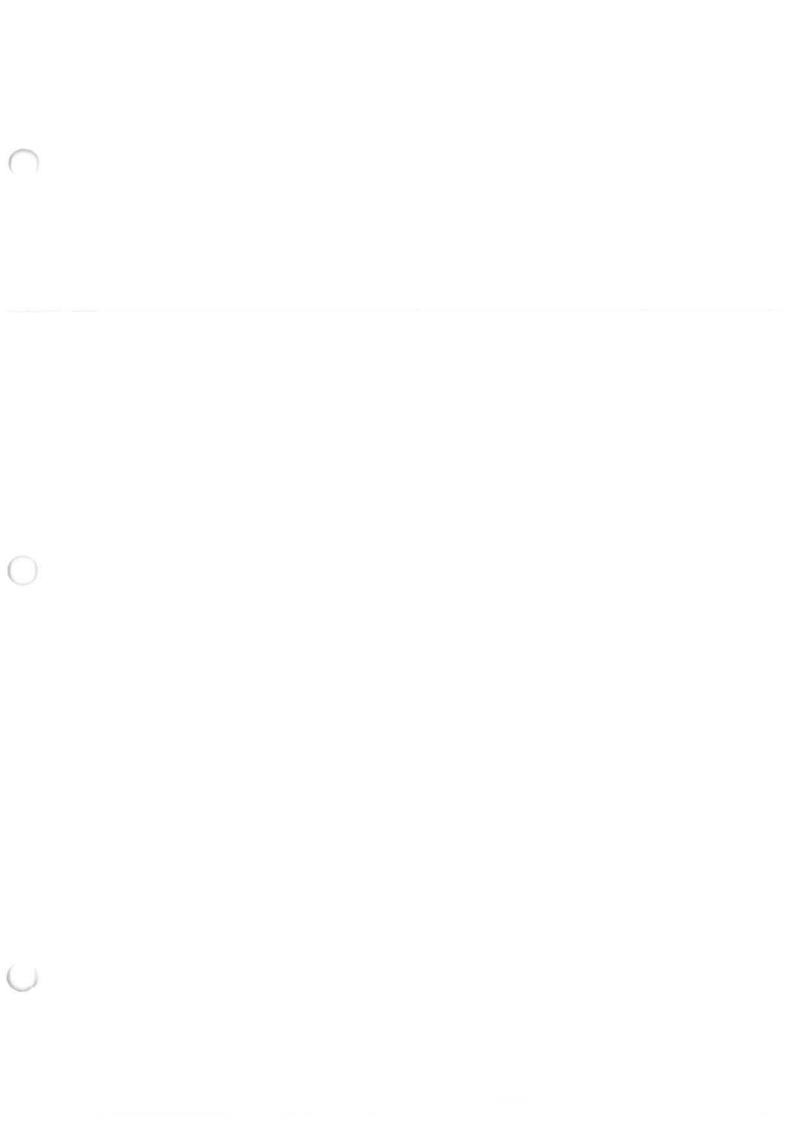


The cloud-native Palco Case Management Portal serves as the multi-tenant repository for all program participant-related data and program business rules. It contains various modules for case management (records, member info), accounting (utilization, pay ledger/history, repository of pay rates and employer cost rates, exemptions, tax rates, workers' comp, budgets), billing, enrollment, time entry, and reporting. We have the capability to map user roles and permissions so that each user role (state program staff, resource consultants, etc.) has a unique permission set, giving them access to the information necessary to best support the self-direction programs in an efficient and successful manner. See Figure 37.

Figure 37: Palco Case Management Portal



Palco developers provide cloud-based software with continuous delivery and an eye toward the user experience, as well as solutions that are configurable with the ability to meet increased demand (scalability). Palco has collaborated regularly with our state stakeholders to identify solutions that benefit all users.







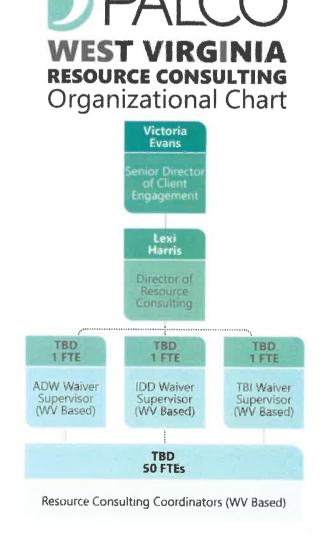
**√**4.3.1

# Resource Consulting

# Figure 38: Resource Consulting Organizational Chart

# NARRATIVE OF RESOURCE CONSULTANT FUNCTIONS

Palco will provide a person-centered Resource Consultant service that enables members representatives to quickly understand their rights and responsibilities and to make informed decisions about their service delivery. They will complete skilled health and welfare visits via phone at a minimum of every month and in person at a minimum of every six (6) months. We regularly hear from our members and their families — some of whom have experienced the institutional medical route firsthand — about the profound impact our work has on their lives, allowing them to stay in their homes and enjoy their families while attaining better quality of life outcomes. We are committed to ensuring that the families we serve have choice and control in their care, and we do this through the right staffing.





Palco has a prescribed framework that includes initial education and outreach to meet and exceed stakeholder needs. To summarize, Palco's approach includes several key items that make up the recipe for successful education and outreach. Within this high-touch model of person-centered education and training, Palco has developed several tools to assist with the dissemination of information and emphasizes our unique approach to education on self-direction.

# Resource Consultants will:

- Assist interested and eligible members and their employees to enroll in Personal Options, including the completion and submission of Employer Enrollment and DCSW Employment and Vendor and Service Provider Packets.
- ✓ Input member and representative information into the web-based portal used by the agency for project management and reporting when appropriate.
- Conduct monthly phone calls to provide oversight and support.
- Assisting members and representative-employers in developing and implementing their service and spending plans.
- Review and update their service/spending plans as appropriate.
- Assist members and representative-employers as appropriate to ensure their DCSWs meet the qualifications including background checks and training.
- Assist members and representative-employers in recruiting and retaining qualified staff and agencies.
- Assist the program as a whole with maintaining an updated caregiver directory database searchable by those in need of care.
- Assist members and representative-employers with understanding DCSW benefits.
- Conduct in-person visits at a minimum of every six (6) months for those who do not receive Case Management services.
  - o Palco's CMP can track and monitor the individuals who specifically meet the criteria for requiring a home visit and ensure the frequency and duration of upcoming visits is tracked and fulfilled.
- Assist the member and representative with the purchasing of authorized goods and services.



- ✓ Monitor the members' health and safety, documenting and reporting any incidents or issues.
- Monitor and document members' and representative-employers' ability to self-direct and follow the program policies and procedures.
- ▼ Report and respond to all member and representative-employer complaints and or grievances regarding the FMS and RC services.
- Act as a mandatory reporter and report on all incidents including allegations of fraud, suspected abuse, neglect, and exploitation.
- Assist with the members' need for reevaluations and assessments should a change in condition constitute a possible need in level of care and service allocations.
- ✓ Interact and collaborate with all program stakeholders including individuals with the Agency division to ensure an efficient program operation.
- ✓ Assist with the development and approval of all member and representative spending plans.
  - See Section 4.2.1.8 on page 28 for more information on the Palco budget tool.
- ✓ Review spending plan utilization with the member and representative-employer during monthly phone calls and six (6) month visits as necessary.
- Obtain and maintain notary public certifications.

# RESOURCE COORDINATION STAFFING PLAN

Palco's staff is what sets us apart from our competitors. We take the time to recruit the best candidates for each position and invest resources in comprehensive training to provide the best outcomes for our clients.

To best support all the new and existing members and workers on West Virginia's Waiver Programs, we will provide a person-center approach when it comes to staffing. This will allow our team of experts to attend any in-person meetings with the Agency.

Palco's dedicated in-state staff upon award of the contract will include three (3) FTE Supervisors. One supervisor for each waiver – Aging and Disability, IDD, and TBI. Each Supervisor will oversee a team of Resource Consulting Coordinators. Our Resource Consulting team will be comprised of program-specific specialists and will be geographically located throughout West Virginia. No matter where the Member/Employer of Record and their consumer-directing Workers are located, we have a friendly Palco team member nearby ready to train, educate, and assist as needed.

The Resource Consulting Coordinator's caseloads are based on geographic proximity to the member, with the dedicated number of coordinators located in a vicinity based on how many members are in that area of West Virginia. This local support allows for a person-centered approach and the ability to meet with members in their home/community at a location of their choosing.



In addition to our in-state staff, we will have dedicated West Virginia customer support and financial management administration teams. Each team/department will be specifically trained in the West Virginia Waiver program's policies and procedures, quickly becoming subject matter experts.

Our Customer Support Center team will be comprised of a Customer Support Director, Customer Support Supervisor, Team Lead, and Customer Support Representatives/Agents. For additional Customer Support staffing details, please refer to Section 4.2.1.142-4.2.1.144 on page 110.

# TRAINING PLAN

Palco will hire qualified and skilled individuals to fulfil the role of Resource Consultant and will provide West Virginia stakeholders with the education and resources they need to be successful. During the onboarding process, each Resource Consultant is assigned to their respective team as outlined above and assigned a seasoned peer to act as their onboarding support. During the initial phase of their employment, all RC staff will receive comprehensive training that is built upon practice-based learning strategies like shadowing, partner activities, and independent activities with oversight. Resource Consultants will receive regular monitoring and coaching to ensure they understand their roles and responsibilities while learning to navigate difficult situations with confidence.

At a minimum, each Resource Consultant will receive training on the following topics:

- ✓ Palco company overview and systems.
- Consumer-Direction 101.
- ✓ HIPAA. Privacy, and Security Training.
- HR and timekeeping training.
- Providing quality customer service.
- Person-centered practices.
- Documentation of service delivery.
- Reporting critical incidents, fraud, waste, and abuse Identification and reporting.
- Electronic Visit Verification (EVV).
- False Claims Act.
- Program-specific details on consumer-direction in the Personal Options program, ADW waiver, IDD waiver, and TBI waiver.

# LOCAL OFFICE

# INFORMATION PERTAINING TO RATIOS OF RESOURCE CONSULTANTS TO MEMBERS

Palco recognizes that to best support, educate, and train Members/Employers of Record and fulfill the requirements of this RFP, we need to have a fully staffed Resource Consultation team located



throughout the state of West Virginia. During the implementation phase, we intend to hire enough Resource Consultants to have a sufficient ratio of 100-1 or less to fully support our members and efficiently deliver the needed services of this contract. In the Staffing Plan outlined in the section above, we discussed having three regions - East, Middle and West. Upon award of the contract, we will identify each region's program population. Member count in each area will determine how many Resource Consultants will be allocated to each region. We plan to monitor each Resource Consultant's workload to make sure the ratio is sufficient. If additional Resource Consultants are needed, we plan to recruit and hire additional staff to adjust the ratio accordingly.

# RESOURCE CONSULTANT CONTACT REEQUIPEMENTS, DOCUMENTATION, ETC.

To ensure Members/Employers of Record have access to ongoing support and ensure their questions are always answered, the assigned Palco RC will complete a check-in with the Member/Representative at least once per month via phone and in-person every six (6) months for those without case management services.

During this contact, the RC will use a monitoring tool to collect information and document the individual's self-direction needs and challenges and their ability to continue serving as an employer.

Some of the standard monitoring questions include:

- Describe how the consumer-directed program meets your needs.
- ✓ Are you experiencing any challenges with participating in this self-direction program? How can I help?
- Do you need help with anything else or have any unmet needs?
- ✓ Have you used your backup worker? If yes, please describe.
- ✓ Is there anything we need to discuss related to your role as an employer or your ability to continue acting as an employer?

The documented responses and an overall summary of the monitoring visit will be captured and stored within the Palco Case Management Portal (CMP). Professional users, like State and program staff will have access to this information and contact notes on demand. See Figures 39 and 40.



Figure 39: Admin Portal Support Coordination

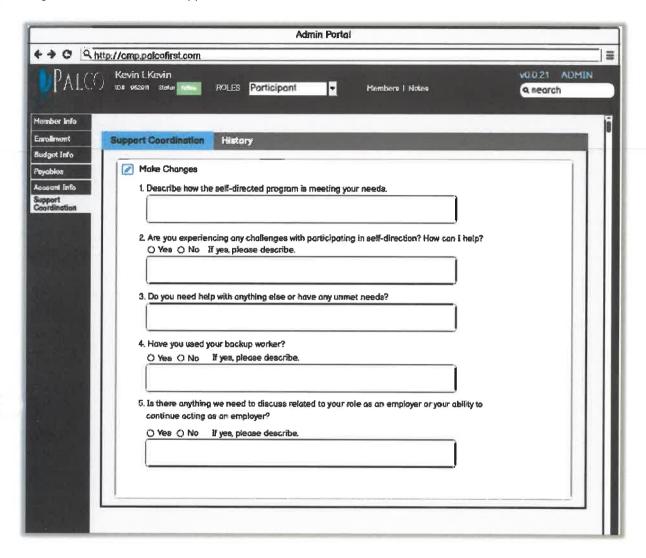
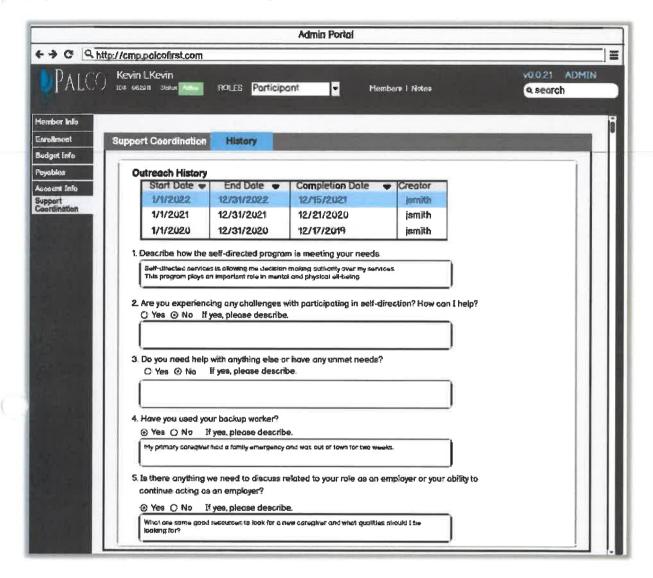




Figure 40: Admin Portal Outreach History



In addition to the regular monitoring outlined above, the Resource Consultant stays in tune with the Member's services and provides additional training and support as necessary. Should the Palco Customer Support Center team or another department staff receive notification of a change in circumstance, such as a change in employer authority, a change in budget or health conditions, or DCSW turnover, a Resource Consultant will be deployed to assist.

During our monthly call and face-to-face visit every six (6) months, the Palco Resource Consultant will assess the member's health and welfare, document any regression identified in the Member's mental, physical, or social functioning, and provide support and guidance.

Should a situation arise where the Member's health, safety, or well-being is at risk, the Palco Resource Consultant is deployed to provide intervention and support immediately. Being geographically located within the community where the Member lives makes that possible. Supporting documentation is collected and provided to State program staff to ensure issues are mitigated quickly.



# **√**4.3.2-4.3.3

# Policies & Procedures (4.3.2) Resource Consulting Billing (4.3.3)

Palco will create and maintain a West Virginia-specific Operational Policy and Procedures Manual that documents all policies, procedures, and processes for F/EA FMS tasks and requirements outlined in this RFP. Our Operational Policy and Procedures Manual will include descriptions of processes and related internal controls that are used to monitor performance of key F/EA FMS contract deliverables and demonstrate a thorough understanding of Centers for Medicare & Medicaid Services (CMS), Internal Revenue Service (IRS), U.S. Citizenship and Immigration Services (US CIS), and federal and state Department of Labor (DOL) rules and regulations, as well as state and local tax rules and regulations. The manual will include, at minimum:

- Completion of employer enrollment paperwork.
- Completion of DCSW enrollment paperwork.
- Completion of employer enrollment activities, such as obtaining a FEIN and assigning appointment of agent.
- Completion of DCSW enrollment activities, such as background checks.
- ✓ Completion of employer termination activities, such as revoking a FEIN and IRS and state appointments of agent.
- ✓ Timesheet review status, including following a timesheet life cycle from submission to payment.
- Payroll payments made.
- ✓ Other payments made, such as tax deposits and filings, garnishment payments, refunds to the department, and any payments to vendors.
- Bank activity, including payments and deposits.
- Support Center activity, including call monitoring and metrics analysis by agent, call arrival patterns and trend analysis, and satisfaction surveys.
- Bill administrative fees only once per month for Waiver program members who are eligible to receive Personal Care services. This is inclusive of Subagent-F/EA and RC services.

Our staff receives continuing education in accounting and law, subscribes to various industry publications, and routinely participates in conferences with national experts to maintain and grow our knowledge of industry practices and changes. The West Virginia F/EA FMS Policies and Procedures Manual will be updated as best practices come to light or to accommodate changes in the program, employment law, or tax codes. We will alert the Department in the event of any changes in these areas and offer solutions for complying with the changes. At minimum, we renew our manual annually.



Once approved, Palco will update the manual as needed, at least annually, and provide all updates to the Agency for review and approval. The manual will be available in electronic format. All modifications will be implemented within 10 days.

Palco's internal controls ensure our staff uses, discloses, and safeguards Protected Health Information (PHI) in compliance with the Privacy and Security Rules under the Health Insurance Portability and Accountability Act (HIPAA) and Health Information Technology for Economic and Clinical Health Act (HITECH) of 2009, as well as state laws, rules, and regulations. Disclosure of protected health information by the workforce must comply with the requirements stated in the contract and/or Business Associate Agreement under which Palco received the protected health information.

 $\sqrt{4.4}$ 

# Approach & Methodology to Compliance with Mandatory Project Requirements

No subcontractors will be used for this project.

Palco has internal controls and policies and procedures in place that are designed to prevent, detect, and report known or suspected fraud and abuse by members, workers, or any other party. Palco has received recognition for its partnership with state agencies to detect, mitigate, and report fraud. We have adequate staffing and resources to investigate unusual incidents and develop and implement corrective action plans to assist us in preventing and detecting potential fraudulent and abusive activities. Quarterly training focuses on preventing Medicaid fraud and educating staff on key areas, such as the False Claims Act and mandatory reporter statutes.

We consider fraud prevention, education, and reporting one of our most important responsibilities. In maintaining accountability, customer support, and excellence in all programs, we have made fraud prevention a high priority. We utilize detection activity resources and tools from member education and training to technological deterrents. For example, our CMP suite of services includes Connect, the Palco time entry solution, which is integrated with Electronic Visit Verification (EVV) and ensures mandatory time entry approvals by both Employers and Caregiver/workers before time is processed for payment.



- ✓ We have established a tactical process to prevent, detect, and respond to fraudulent activities.
- Training for Members/Employers of Record as well as DCSWs about the responsibilities of self-direction.
- Effective communication paths for reporting fraud.
- ✓ Training for our own staff and program stakeholders on the roles and responsibilities of being a mandated reporter.
- Monitoring with internal controls and policies and procedures designed to prevent, detect, and report known or suspected fraud and abuse by Members/Employers of Record, Workers, or any other party.
- Investigation of fraud and financial abuse allegations in a timely manner, involving appropriate members of our management and leadership team.
- ✓ Palco maintains several channels for reporting any fraud or abuse including our customer service toll-free line and a dedicated email box <a href="mailto:privacy@palcofirst.com">privacy@palcofirst.com</a>.
  - The privacy box is monitored by our Privacy and Security Officer. Any complaints or reports of fraud, waste, and abuse are followed up on within one (1) business day following the appropriate program and policies and procedures.
  - Any reports are triggered to the necessary program account manager for follow up and State notification.

# FRAUD WASTE AND ABUSE

According to the National Resource Center for Member-Directed Services (NRCPDS), "Research indicates there is no increased risk of fraud within participant-directed programs. In both [self-direction and traditional agency] services, quality management systems are used to prevent fraud. Member direction is an efficient model in its own right: By directly linking services and support to each person's needs and preferences, it promotes expedient service delivery." Even so, Palco remains fiscally diligent to protect against waste and fraud and remains swift in every instance of abuse with deterrence, detection, and response protocol.

Deterrence mechanisms include activities surrounding education, auditing, community engagement (including education through orientation), enrollment education, periodic training, worker background checks, and member resources. The West Virginia DCSW Employment Enrollment Packet will contain an overview of the DCSW enrollment process, specifically the background checks and employment eligibility requirements including barrier crimes, the Child Abuse and Neglect Central Registry, and the federal List of Excluded Individuals and Entities (LEIE).

Detection Mechanisms are detection components to uncover fraud and misconduct. We know that workers and employers aid by promoting an environment of accountability in their homes by keeping a watchful eye for suspicious activity, and knowing how, and when, to report it. Time evaluations are reviewed internally and externally and include pre-pay reports and a direct email sent to our Privacy



Officer, provided for reporting concerns. All Palco workers remain vigilant and are provided fraud, waste, and abuse training.

Palco responds to suspected fraud and reported misconduct with these Response Mechanisms. Once a report is received, our executive team evaluates and immediately contacts local investigators, and if required, outside counsel is retained. There is a referral sent to the state and/or federal fraud units and corrective action includes self-reporting and a report of findings with outcomes included.

Palco has developed and implemented policies and procedures that emphasize the application of the philosophy of member direction, and we foundationally believe in a culturally sensitive, personcentered approach when providing every aspect of program services and supports. Palco continues to employ a diverse group of people who receive training on person-centered philosophy. The commitment to person-centered services is evident. A copy of a Fraud, Waste, and Abuse Companion Guide is included as **Appendix 5**.

In addition, we have a website accessible to all that is kept up to date with program information and forms. We will produce internal controls documented for our West Virginia-specific staff as well as a Subagent-F/EA FMS Policies and Procedures Manual upon award to monitor the accuracy and currency of the materials posted on the website and the effectiveness of the system. Our web portal (Connect), as well as our web-based interactive payroll system, will be configured specifically for West Virginia and maintained. Agency, members/representatives-employers, DCSWs, Resource Consultants, and Case Managers (as applicable) will have access to all necessary information in real time, 24/7, to monitor all spending and utilization related to DCSW payments and invoices.

# MANAGING PUBLIC FUNDS

Palco, Inc. will establish and maintain a separate accounting and information system for receiving and disbursing funds, and for tracking transactions and budgets. We will establish separate bank accounts for our administrative fees and for the sole purpose of receiving payments for member services. No funds in either account will be comingled with any other funds, and funds will be used only as directed under this RFP.

Our banking and accounting controls include the following, approved through a Board resolution 5:

- ✓ The owners of Palco are the only allowed signees on our bank account. All checks must be signed by an owner of the company, who are both licensed Certified Public Accountants bound by codes of professional ethics related to financial integrity.
- Our financial institution has an exclusive list of pre-approved entities that can withdraw money or debit funds from our accounts. Such entities include the IRS for tax payments, the MA Program, and state tax authorities. Anyone not on this list cannot debit funds. Funds withdrawn must be

<sup>&</sup>lt;sup>5</sup> Palco is a member of ASC X12, the Accredited Standards Committee for EDI standards and XML schemas used in billing processes. Our system meets the requirements of MMIS billing, including confidentiality and security.



approved by the Board of Directors and may only be for program taxes and insurance. All bank charges are absorbed by Palco.

- ✓ Annually, we execute a notarized **Memorandum of Understanding** (MOU) with our financial institution within 14 days of the contract award. This MOU establishes a clear understanding that the account's funds belong solely to the Medicaid beneficiaries, and creditors are not allowed to encumber or acquire funds from this account.
- ✓ Randomized time-sensitive passcodes are generated by our financial institution each time we send a direct deposit file to prevent unauthorized access to funds.
- Proper segregation of duties is engaged through the payroll process with operations separated from reconciliations, for example.
- ✓ Palco follows Generally Accepted Accounting Principles (GAAP) in the use of a general ledger and subsidiary accounts for handling of member funds. This creates an auditable system for managing member's spending plans, payroll processing, claims submission, and related reporting.
- ✓ Reconciliations are performed on a continual basis to ensure quality. It includes financial account balancing, comparing data to ensure accuracy and completeness of transactions, and investigating discrepancies.
- ✓ We will receive funds with electronic funds transfer (EFT), and we will receive, disburse, and track Medicaid and State funds as specified in the RFP. We will reimburse the State for any funds remaining in the administrative or member services separate bank accounts on June 30 of each State fiscal year.
- ✓ Palco prepares and submits a bank account report, including a monthly reporting of bank account activity, a summary of the month's bank activity, reconciliation of the bank balance to the General Ledger, and reconciliation of any amounts advanced to Palco.

Palco will absorb, at no additional cost to the Agency, all bank charges including monthly fees and stop payment fees that were initiated by the contractor and will not reduce the balance of the separate administrative bank account or reduce the balance of the member's self-directed budget. We will withdraw from the separate administrative bank account all payments made by the Agency for the Subagent-F/EA FMS administrative fees within seven (7) calendar days of receipt.

To ensure quality, we will review a billing sample on a quarterly basis and trace it through the accounting system to payment and billing. Our banking and accounting controls include the following:

- Proper segregation of duties is engaged through the payroll process with operations separated from reconciliations, for example.
- We will enroll required workers in the Agency's current Fiscal Agents System/MMIS prior to their providing paid services. We will invoice for FEA and optional services only once for any members who are dually enrolled in a waiver program and the TMH or Personal Care program. If the Agency elects to utilize optional services, we will provide Resource Consultant services directly and not subcontract with another entity to perform any of the Resource Consultant tasks.



- Reconciliations are performed on a continual basis to ensure quality. It includes comparing hours of services billed and paid, a review of items left to be paid, reviewing records for accuracy and completeness, and investigating discrepancies.
- Maintaining billing records for internal audit purposes that verify amounts of claims and support claims.
- Any remaining member funds will be returned to the State at the end of the fiscal year.
- We provide an accountability system including quality indicators, performance metrics, and methods for monitoring key indicators.
- Internal processes that ensure the proper function of all areas of operations, including Worker eligibility and status, employment practices, tracking member's budget funds and spending plan activity, verifying accuracy of timesheets, ensuring payroll accuracy, monitoring billing and claims submissions, and preventing, detecting, and reporting known or suspected incidents of fraud and abuse.

For each activity, there are target objectives, risks, and related quality initiatives. Performance metrics assigned to each key item provide a continual feedback loop for quality assurance and improvement. Each time a payroll is complete, money received for payment of funds is reconciled to money paid out. In addition, each month, the bank statement is reconciled to CMP. Regular reconciling of all funding is critical to ensure that internal controls are performing properly, no fraudulent transactions have occurred, and individuals are using their budgets appropriately.

We agree to be bound by the Service Level Agreement(s) (SLAs) provided by the State which will be documented within our policy and procedure manual as well as completing all implementation activities within three (3) months. We will work jointly with any subsequent Vendor upon expiration and/or termination to supply historical Employer of Record and Employee information needed to ensure a smooth transition of services during the integration period. Sample reports will be provided to the Agency at least 30 calendar days prior to the Operations Start Date for the Agency review and approval.



# QUALIFICATIONS AND EXPERIENCE INFORMATION

#### QUALIFICATIONS AND EXPERIENCE

PROVIDE INFORMATION AND DOCUMENTATION REGARDING ITS QUALIFICATIONS AND EXPERIENCE IN PROVIDING SERVICES OR SOLVING PROBLEMS SIMILAR TO THOSE REQUESTED IN THIS RFP. INFORMATION AND DOCUMENTATION SHOULD INCLUDE, BUT IS NOT LIMITED TO, COPIES OF ANY STAFF CERTIFICATIONS OR DEGREES APPLICABLE TO THIS PROJECT, PROPOSED STAFFING PLANS, DESCRIPTIONS OF PAST PROJECTS COMPLETED (DESCRIPTIONS SHOULD INCLUDE 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), REFERENCES FOR PRIOR PROJECTS, AND ANY OTHER INFORMATION THAT VENDOR DEEMS RELEVANT TO THE ITEMS IDENTIFIED AS DESIRABLE OR MANDATORY BELOW.

# Qualifications and Experience Generally

### 4.5.1.1 WORK PLAN

# Objective:

- ✓ Palco will provide efficient and cost-effective F/EA FMS as a subagent to the Agency (the Government F/EA FMS Agency).
- Palco's systems, policies, procedures, and internal controls will respond to the Agency's needs.
- ✓ Throughout the life of the contract, adjustments will be made to respond to Agency needs or changes in federal or state regulations.

# Methodology:

- Sufficient staffing, as outline below.
- Project plan high level Gantt Chart, attached in Appendix 2.
- Leveraging our experience and longevity in the industry, as described in Section 4.5.3.
- Utilize cutting-edge technology, as described in Section 4.2.1.



### The Palco Team:

To support the proposed project, the following Executive Leadership, Senior Management and Operations staff will be devoted to this project:

Table 5: Palco's Proposed Project Team Members

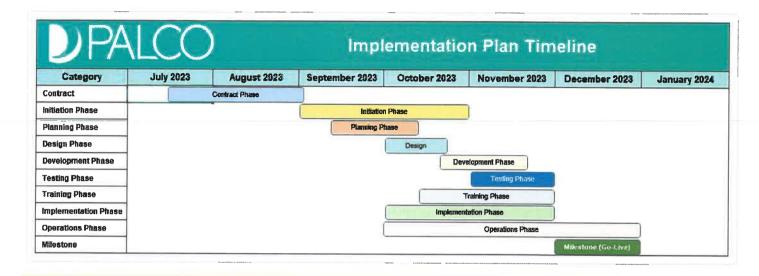
Position	Palco Personnel	
Chief Executive Officer	Alicia Paladino, MBA, CPA, Esq.	
Chief Financial Officer	Larry Paladino, CPA	
Chief Operating Officer	Mark Biviano	
Chief Technology Officer	Jeff Leis	
Chief Information Officer	Mike Brower, MAcc	
Senior Vice President, Product Management	Cayle Cox, MBA	
Senior Director of Operations	Kady Predota	
Senior Director of Client Engagement	Victoria Evans, DrPH	
Project Manager	Amelia Weglewski, CPA (Interim)	
F/EA Director	Stephanie Gallagher	
Director of Customer Service	Toni Rose	
State Director of Resource Consulting Brokerage	Lexi Harris, MHA	
<b>Enrollment Services and Training Manager</b>	Cody Waits	
Payroll and Invoice Payment Manager	Taylor Johnson (Interim)	
Billing Manager	Paula Soll	

Upon award, Palco will hire and assign the following staff to be dedicated solely to the West Virginia Personal Options program and project. A Program Manager, an ADW Supervisor, an IDDW Supervisor, a TBIW Supervisor, and a Personal Care Supervisor. All key positions will be filled by individuals located in the state of West Virginia. To fulfill the roles in the interim, Palco has identified already existing and qualified staff to assist in the start-up and implementation. Resumes as well as degrees and certificates when applicable are included for your review within this document in Appendix 8.

# **RESOURCE ALLOCATION AND TIMEFRAME:**

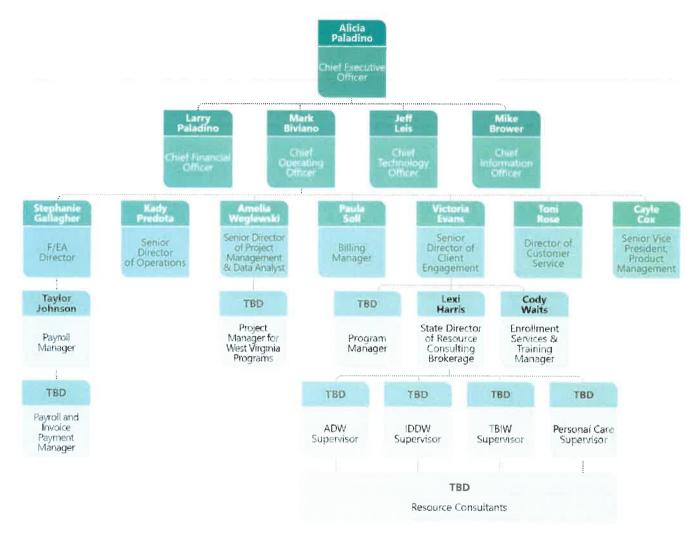
Palco has developed a proposed Implementation Plan for the state of West Virginia to review. Palco is prepared to execute start up in October of 2023 with an implementation of January 2024. This Implementation Plan includes key personnel with experience with Financial Management Services (FMS), including Executive Leadership, Project Management, Enrollment, Payroll, Customer Support, and IT Development. Palco's implementation plan includes the estimated hours for each activity/task and who will be assigned to lead and complete the task for this project. A high-level Gantt Chart of this project plan can be seen below in Figure 41 and in Appendix 2. Palco will customize the implementation plan and schedule as well as dates upon award of the contract with input from the Agency/BMS program staff to align our goals and schedule collectively.

Figure 41: Implementation Plan Timeline



#### 4.5.1.1.1. ORGANIZATIONAL CHART

Figure 42: Palco Organizational Chart



# 4.5.1.1.2-4.5.1.1.2.4; 4.5.1.2 ROLES, RESPONSIBILITIES, AND STAFF SKILLSET

# **EXTERNAL CERTIFICATIONS**

Palco's team of qualified experts possesses a wide range of professional licenses, certifications, education, and demonstrated experience that gives them the capability to provide you with the highest grade of expertise. They are well versed in applicable FMS/Resource Consultation Brokerage service delivery models and are vastly accustomed to familiarizing themselves with client and project-specific needs and requirements.



### **OUR EXPERTISE INCLUDES:**

- Certified Person-Centered Thinking Trainer.
- Skilled Medicaid MMIS billing and claims team with over 40 years of experience.
- Multiple Lean Six Sigma (yellow belt, green belt) certified IT team members.
- Certified Scrum Master/Agile Certified.
- ✓ Multiple staff with advanced degrees (e.g., MBA-Accounting Information Systems, MS-Information Systems, MS-Information Technology, MS-Computer Science, MHA, MPH, DrPH,
- Project Management Professional (PMP) Certified.
- HIPAA Certified.
- HITREC Certified.
- Certified Public Accountants.

# **PROFESSIONAL MEMBERSHIPS**

- Arkansas Bar Association
- Arkansas Society of Certified Public Accountants
- ✓ American Institute of Certified Public Accountants
- ✓ Applied Self-Direction
- Accredited Standards Committee (ASC) X12

# 4.5.1.1.4 KEY STAFF BASED IN WEST VIRGINIA

### STAFFING PLAN

Upon contract award, Palco will hire and employ full-time employees for each key staff position in West Virginia. These key staff members will be based in West Virginia and will be 100% dedicated to the WV Personal Options Program. Employing local staff allows our key staff personnel to better understand the diverse communities in which we support. This approach also allows us to develop a closer and more meaningful relationship with our clients in West Virginia.

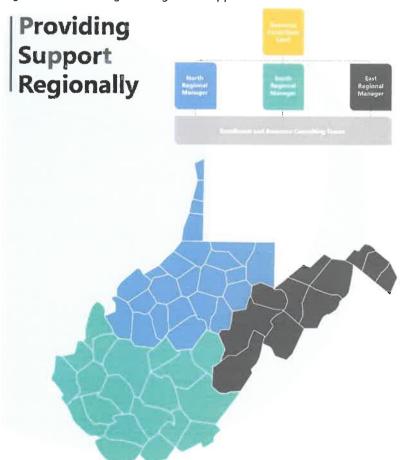
In addition to providing local support through our West Virginia-based key staff, we have also created a dedicated transition team to oversee the overall transition in West Virginia specifically. This allows us to ensure a seamless transition, immediately building relationships and foundations for providing services in West Virginia. The transition team will include hiring and training local key staff members. The team includes executive leadership, members of our operations team, subject matter experts, and several other staff members, all of whom have extensive experience leading transitions and implementations in other programs.

### STAFFING REQUIREMENTS

Upon contract award, Palco will be sure to have sufficient staff with the proper experience, skills, and credentials as outlined in **Section 4.5.1.2** of the RFP. This includes having our resource consulting staff complete all federal and state background checks as required by West Virginia, as well as running additional monthly checks to avoid having any personnel appear on any exclusion lists. These resource consultants will meet the minimum qualifications outlined by the state of West Virginia in section 4.5 of the RFP.

To best support all the existing and new members and workers on West Virginia's waiver programs, we will provide a person-center approach when it comes to staffing. Palco's dedicated in-state staff will include a Resource Consultant Lead and Account Manager. Each role will oversee their required program functions in the waiver programs. Additionally, we will have in-state Resource Consultants and Regional Managers geographically located throughout West Virginia. No matter where the Member/Employer of Record and their consumer-directing Workers are located, we will have a friendly Palco team member nearby ready to train, educate, and assist as needed.

Figure 43: West Virginia Regional Support



Our Resource Consulting team will be comprised of programspecific specialists in three (3) regions - North, South, and East. Palco is happy to adjust this approach upon guidance from the State upon award. Each region will have a designated Regional Manager or Supervisor that will report to the State Director, and they will oversee a team of Resource Constants that will be assigned Caseloads are a caseload. based on geographic proximity to the member, with the dedicated number of Resource Consultants in each region determined by the number of members in the region. Typically, the Regional Manager will assign a Resource

Consultant based on the zip code of both the Resource Consultant and the member. This local support allows for a person-centered approach and the ability to meet with members in their home/community,



at a location of their choosing. See Figure 43 above for Palco's geographical regions and organizational chart.

In addition, we will have a dedicated operations team that will work in conjunction with our West Virginia in-state staff. Our operations team includes customer support and financial management administration. These departments will be located in our main office in Little Rock, Arkansas and throughout the country working remotely. Each team/department will be specifically trained on the West Virginia waiver program's policies and procedures, quickly becoming subject matter experts.

Our Customer Support Center team will include a Customer Support Director, Customer Support Supervisor, Team Lead, and Customer Support Representatives/Agents. For additional Customer Support staffing details, please refer to Section 4.2.1.142-4.2.1.144 on page 110.

The Financial Administration will be made up of West Virginia experts in Payroll, Billing, and Tax/Accounting departments. Each department will have a dedicated manager that will oversee a team of specialists to ensure payroll is processed and paid out correctly, taxes are withheld correctly, and if any exemptions are applicable and billing reimbursement claims are being filed timely.

West Virginia-specific Staff		
Role	Minimum Full-Time Employees	Based in West Virginia?
Project Manager	1	Yes
Payroll and Invoice	1	Yes
Payment Manager		
ADW Supervisor	1	Yes
IDDW Supervisor	1	Yes
TBIW Supervisor	1	Yes
Personal Care Supervisor	1	Yes
Resource Consultants	50	Yes

# (1) Program Operations Staff

# Amelia Barnes, CPA, Project Manager for West Virginia Programs (Interim)

- Roles and Responsibilities. Amelia will fulfil the role of Data Analyst and Project Manager. She creates and monitors reports for quality metrics and trends. She will oversee the implementation of the project and ensure that we are meeting contract deliverables. Amelia also has experience reviewing person-centered plans, consulting with community and health professionals, comparing requested services to budgets, and issuing pre-authorizations, clarifications, or denials of services. She reviews client interactions daily to find areas of improvement or clarification and schedules appropriate resolutions and technical assistance.
- Skillset. Amelia has been with Palco for more than five (5) years and has over 11 years of accounting and payroll experience. She earned both her bachelor's and Master of Arts degrees in accounting and is a Certified Public Accountant (CPA). In her tenure with Palco, Amelia has

overseen the tax department, enrollment team, project management, and implementation teams. Her vast experience in F/EA is unmatched by competitors and has brought her great success in every role she fills. This includes leading and managing enrollment and disenrollment of members and their representatives, developing/completing employer enrollment and worker and vendor engagement packets, and implementing employer orientation and skills training for members and representatives. Amelia understands the predecessors of the FMS business in a way that others cannot compete with, ensuring she will lead a successful implementation like she has several times previously. She has led several complex projects in traditional-Medicaid-models aswell as Managed Care. Most recently, she led the implementation of more than 5,000 clients and 1,000 agency-based vendors into a new FMS and EVV solution in a 90-day period.

<u>Upon award, Palco will ensure that key staff, as required by West Virginia BMS, are located in the state of West Virginia and 100% dedicated to the WV Personal Options Program.</u>

### TBD, Project Manager for West Virginia Programs

- Roles and Responsibilities.
  - 4.5.1.1.2.1 propose a key position of a project manager for the Subagent-F/EA FMS with experience leading and effectively managing F/EA FMS and optional RC operations.
- Skillset.
  - The project manager should have a bachelor's degree from an accredited four-year college or university and have three (3) years' experience managing the provision off/EA FMS, members' budgets and managing Subagent-F/EA FMS staff. The project manager's experience should include:
  - 1.2.1.1 Leading and managing the enrollment and disenrollment of members and their representatives with a F/EA FMS entity.
  - 1.2.1.2 Developing/completing Employer Enrollment and DCSW Employment/Service Provider and Vendor Engagement Packets
  - 1.2.1.3 Implementing the provision of common law employer orientation and skills training for members and representatives.

4.5.1.1.2.2 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' hours worked and preparing and issuing DCSWs' payroll; processing and paying invoices to service providers and participant-directed vendors; and performing related activities including developing and maintaining a separate bank account, data base copies, files and records and preparing and issuing reports to members and government agencies, as required.

### Taylor Johnson, Payroll Manager (Interim & Supervisor)

✓ Roles and Responsibilities. Taylor oversees the payroll and invoice payment process from timesheet entry to payment. He is responsible for monitoring the influx of timesheets and payment requests through EVV, online portal, fax, email, and assigning additional resources, if needed, to meet the submission and payment deadlines. Armed with advanced technical

knowledge, he shepherds information across the various systems to ensure that payroll is properly generated, with all the various Federal and State tax and labor laws accounted for properly. Taylor also pays invoices to service providers and participant-directed vendors, ensuring that backup withholding is generated, if necessary. Taylor currently manages dozens of bank accounts and is skilled in establishing separate bank accounts for each program and monitoring bank activity through the help of the Palco Accounting Team. Taylor's processes are fortified with quality control measures to not only ensure the accuracy of payroll and invoice payment, but to make certain we have supporting database copies, files, and records for audit trail purposes. Lastly, Taylor oversees the production of reports to members and government agencies, as required.

Skillset. Taylor has been with Palco for more than three (3) years, serving as the Payment Manager for processing payroll. He attended the University of Central Arkansas, where he earned his bachelor's degree. During his time with Palco, Taylor has overseen payroll for dozens of selfdirection programs, issuing several thousands of payments to both vendors and workers on a weekly basis. Taylor has a keen eye for operational efficiency, consistently offering improvements to benefit payment processing for the program as a whole.

Upon award, Palco will ensure that key staff, as required by West Virginia BMS, are located in the state of West Virginia and 100% dedicated to the WV Personal Options Program.

### TBD, ADW Supervisor

- ✓ Roles and Responsibilities. Upon award, Palco will hire a designated ADW Supervisor with at least a bachelor's degree from an accredited four-year college or university and two (2) years of experience working with members who are self-directing their services.
- ✓ Skillset. Upon award, Palco will hire a designated ADW Supervisor with at least a bachelor's degree from an accredited four-year college or university and two (2) years of experience working with members who are self-directing their services.

### TBD, IDDW Supervisor

- Roles and Responsibilities. Upon award, Palco will hire a designated IDDW Supervisor with at least a bachelor's degree from an accredited four-year college or university and two (2) years of experience working with members who are self-directing their services.
- ✓ Skillset. Upon award, Palco will hire a designated IDDW Supervisor with at least a bachelor's. degree from an accredited four-year college or university and two (2) years of experience working with members who are self-directing their services.

### TBD, TBIW Supervisor

Roles and Responsibilities. Upon award, Palco will hire a designated TBIW Supervisor with at least a bachelor's degree from an accredited four-year college or university and two (2) years of experience working with members who are self-directing their services. The TBIW Supervisor will live in West Virginia.



✓ **Skillset.** Upon award, Palco will hire a designated TBIW Supervisor with at least a bachelor's degree from an accredited four-year college or university and two (2) years of experience working with members who are self-directing their services. The TBIW Supervisor will live in West Virginia.

### TBD, Personal/RC Care Supervisor

- ✓ Roles and Responsibilities. Upon award, Palco will hire a designated Personal Care Supervisor with at least a bachelor's degree from an accredited four-year college or university and two (2) years of experience working with members who are self-directing their services.
- ✓ **Skillset.** Upon award, Palco will hire a designated Personal Care Supervisor with at least a bachelor's degree from an accredited four-year college or university and two (2) years of experience working with members who are self-directing their services.

### Lexi Harris, MHA, State Director of Support Brokerage

- ✓ Roles and Responsibilities. Lexi oversees 20 dedicated Enrollment/Support Coordinators. Lexi's responsibilities in West Virginia will include overseeing the initial implementation of Resource Consultant recruitment, as well as hiring and training new team members on West Virginia's program rules and procedures.
- ✓ **Skillset.** Lexi has more than 20 years of experience serving vulnerable populations with 12 years in self-direction working with programs across the country. Lexi earned a bachelor's degree in sociology and a master's degree in health care administration and gerontology. She has been with Palco for more than two (2) years, working and assisting with different projects, including but not limited to Spanish training for our members and the Support Coordination team to support our Arkansas contract. Prior to joining Palco, Lexi worked at a competitor FMS organization for 5 years, in the role of State Director overseeing a self-directed service model assisting 10,000 members.

### (2) Executive and Management Staff

### Alicia Paladino, CPA, ESQ, Chief Executive Officer

- ✓ Roles and Responsibilities. Alicia has a unique and unparalleled approach to delivering F/EA services, unbeatable by our competitors. Her approach focuses on the needs of the client and then leverages technology and other operational efficiencies to achieve the needs of the client. She leads with a hands-on approach to management and is involved in the overall day-to-day operations. For West Virginia, Alicia lends her legal and accounting backgrounds to ensure contract and legal compliance in all areas of company functions. She is available to West Virginia stakeholders, not just during the contracting and implementation process, but all throughout the life of the project to ensure the needs of the client are met in a way that protects the program.
- Skillset. Alicia defines Palco's vision of success, sets the overall company direction, and ensures that all operations meet the company's mission and objectives. For over 17 years, she has established the efficiencies to help older adults and those with intellectual or physical disabilities remain in their homes and communities. As a company strategist, she provides a steady hand in the overall direction of the company, including offering new services, cutting edge technologies,

and adjusting processes to accommodate industry changes. Alicia has an accounting degree from Louisiana State University and a master's in business administration and Juris Doctorate from the University of Arkansas. She is a licensed attorney and a Certified Public Accountant (CPA). She is an active member of the AICPA, the Arkansas Society of CPAs, and the Arkansas Bar Association. In private practice, she specialized in tax and employment law, serving a variety of clients from low-income taxpayers below the Federal Poverty Line to advising Fortune 500 companies in complex labor and tax matters.

### Larry Paladino, CPA, Chief Financial Officer

- ✓ Roles and Responsibilities. Today, Palco relies on Larry daily for accounting expertise, leadership, and overall guidance. He provides all oversight of the financial and reconciliatory functions of program operations and ensures that financial aspects of program operations are fully funded and handled responsibly. He is responsible for the preparation of corporate financial records. Larry oversees the accounting team directly, ensuring that bank reconciliations are performed timely and that all ledger activities are recorded properly. The accounting team regularly tests internal controls over program operations through quality reviews. Lastly, Larry personally checks all payroll tax returns such as 941 and W-2s.
- ✓ Skillset. Larry is a CPA with over 40 years of experience in both the public and private accounting sectors. He is an architectural leader in his practiced industries, to whom he selflessly offers his expertise. Before there were structured self-direction programs, and associations, small business owners like Larry helped shape the foundation and direction of Medicaid programs. In 1990, Larry's keen insight into accounting practices and his moral compass provided the foundation of financial safeguards and protections to the FMS framework.

### Mark Biviano, Chief Operating Officer

- Roles and Responsibilities. Mark's expertise with complex organizations and large-scale projects continues to inform our choices at Palco today. For this contract, Mark will ensure that all program requirements are completed prior to the operational start date and to the design that we promised. During the delivery of services, Mark contributes to the development of overall company direction and directs policies and procedures of daily operations to achieve those objectives. He is committed to client satisfaction, instilling that philosophy in all areas of operations, particularly the support offered by our operations staff. Mark is known for having a direct relationship with clients, and our partners can rest assured that they always have access to Palco executive leadership when the need arises.
- ➤ **Skillset.** Mark delivers the leadership, management, and vision necessary to ensure that the company has the proper operational controls, administrative and reporting procedures, and systems in place to effectively grow the organization and to provide the strength and operational efficiency. With a degree in finance, Mark joined Palco with over 30 years of information technology service delivery and management experience at both Oracle and SAP. Here, Mark served as an executive responsible for the delivery of cutting-edge technologies and ensuring that solutions were implemented to meet client needs. Mark also has a decade of legislative experience, where he served primarily in the health care space. During his legislative tenure, Mark sponsored much-needed health care legislation designed to serve the neediest Arkansans.



### Jeff Leis, Chief Technology Officer

- ✓ Roles and Responsibilities. Today, Jeff is responsible for integrating the business needs and requirements into our technological stack. He oversees the technical design of solutions with a philosophy of innovation and design of a configurable system to carry us and our clients into the future. Jeff continually harnesses the latest technologies to meet client needs and ensures that our development team delivers on requirements.
- ✓ **Skillset.** For 13 years, Jeff has overseen the network administration, help desk and support operations, development, testing, integration, and IT strategy of the organization. He lends his years of expertise, as well as obtaining a bachelor's degree in computer science at the University of Arkansas, to ensure that Palco is at the forefront of technological advances in the health care industry. Prior to joining Palco, Jeff led a team of developers in the design and development of medical billing software for an international company that is a leader in software development. He was an executive member of a development and network team responsible for supporting architectural services within Walmart International Headquarters.

### Cayle Cox, MBA, Senior Vice President, Product Management

- ✓ Roles and Responsibilities. Cayle will lead West Virginia's requirement gathering sessions, document business requirements, and coordinate development resources to ensure this project meets all defined requirements. Once the project is implemented, Cayle will continue to engage with West Virginia stakeholders on a regular basis to ensure customer satisfaction with Palco's products. He will also proactively look for opportunities to improve Palco's products so West Virginia can better meet the needs of its consumer-directed population.
- ✓ **Skillset.** Cayle has over 15 years of leadership experience. As SVP, Cayle sets the short-term priorities and long-term strategies for our products. Prior to joining Palco, he worked at FDGS in various roles including Delivery Executive, Business Analyst Director, Project Manager, IT Manager, and Globalization Lead. Cayle spent 8 years overseeing large scale and statewide implementation of EVV solutions on behalf of a Fortune 500 company to meet the requirements of the 21<sup>st</sup> Century Cures Act. Cayle is an expert in stakeholder engagement, client relations, program management, operations management, and project delivery. He has a master's in business administration, he is a certified Project Management Professional, and is ITIL certified.

### Mike Brower, MAcc, Chief Information Officer

- ✓ Roles and Responsibilities. Mike's department is responsible for maintaining Palco infrastructure to support our transactions, provide disaster recovery, protect confidential information, and deploy and maintain the Palco solutions. Mike monitors all quality controls, privacy, and security measures in place to protect the infrastructure and integrity of the Palco products. Mike is constantly focused on building efficient processes that allow our organization to grow and meet the ever-changing landscape of Medicaid and self-directed service delivery. Mike will ensure that deliverables are met and new features to serve West Virginia are delivered as promised and on time.
- ✓ Skillset. With nearly 30 years of experience in technology, Mike leads a team of in-house Palco developers and software engineers with the development and integration of new software and

technologies. He is committed to keeping staff in-house to develop Palco's knowledge base, understanding that practice is critical to building solutions. Mike has a master's degree in accounting and information technology from one of the nation's top accounting programs, and his knowledge has proven invaluable to our unique F/EA business. As a Certified Scrum Master, Mike actively drives the development life cycle, including requirements analysis, design, coding, documentation, regression and quality testing, implementation, and support and delivery functions. He works with internal and external users of the software to plan new software features. Mike's regular collaboration with Product Management ensures that we deliver to our clients what we promise.

### Kady Predota, Senior Director of Operations, Chief Privacy Officer

- Roles and Responsibilities. In addition to serving as a backup Contract Manager to Dr. Victoria Evans, helping to assist in all aspects of the contract, Kady will provide her expertise in program design and implementation to ensure all systems are configured properly, and she will work with the state to develop relationships and coordinate planned enhancements. Under her leadership, her team will develop the plan to communicate and engage program stakeholders to prepare for a seamless transition, which Palco has executed without issue many times before.
- ✓ Skillset. Kady has over 14 years of experience in self-direction, working with programs of all sizes. across the country and holds a bachelor's degree in human services from Metropolitan State University of Denver. She began her career working as a case manager in an F/EA program to improve the care of individuals with developmental disabilities. She is a nationally certified trainer for Person-Centered Practices, training, and techniques. Her FMS experience includes management of service delivery, billing, accounts payable, payroll, program transition, implementation, and operations. Kady has extensive knowledge of self-direction and has guided the growth of programs nationwide. She also led the implementation of EVV in multiple states to ensure all the 21st Century Cures Act requirements were met, and that members, employers, and workers were trained. Kady is an active, participating member on the National Center on Advancing Person-Centered Practices and Systems (NCAPPS) self-direction learning collaborative seeking to improve consumer-directed program initiatives on a national and local level. She is a voice for industry best practices and guidance on the Applied Self-Direction (ASD) advisory board. In addition to her role as Senior Director, Kady is the Chief Privacy Officer of Palco overseeing all privacy and security initiatives and training requirements of staff.

### Victoria Evans, DrPH, Senior Director of Client Engagement

Roles and Responsibilities. Victoria will serve as the Contract Manager in West Virginia. Here, she will lend FMS experience including stakeholder engagement, client relations, operations program policy expertise, program development, and implementation management, management. Victoria will oversee Palco's Resource Consultation Lead, Account Manager, and Project Lead functions to ensure all program requirements are meeting expectations. She will meet with the state regularly to develop the partnership and ensure quality is felt by every professional and program stakeholder at every stage of the project. Program initiative and the roll out of new features will be led by Victoria in a clear and organized manner. We will build



trust and a fruitful relationship with BMS through her dedication to program excellence and leadership.

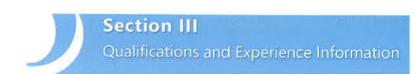
✓ **Skillset.** Victoria is a health policy professional with over 10 years of Medicaid policy and programmatic experience, including six (6) years of experience with Home and Community-Based Services (HCBS) and self-direction programs. She has served in both the public and private sector in a variety of leadership, operations management, research, and policy development roles for the Arkansas Department of Human Services and at private entities. She earned a bachelor's degree in medical sociology at the University of Central Arkansas, a Master of Public Health degree in epidemiology at the University of Arkansas for Medical Sciences, and a Doctor of Public Health in public health leadership from the University of Arkansas for Medical Sciences' Fay W. Boozman College of Public Health.

### Amelia Barnes, CPA, Senior Director of Project Management and Data Analyst

- ✓ Roles and Responsibilities. Amelia will fulfil the role of Data Analyst and Project Manager. She creates and monitors reports for quality metrics and trends. She will oversee the implementation of the project and ensure that we are meeting contract deliverables. Amelia also has experience reviewing person-centered plans, consulting with community and health professionals, comparing requested services to budgets, and issuing pre-authorizations, clarifications, or denials of services. She reviews client interactions daily to find areas of improvement or clarification and schedules appropriate resolutions and technical assistance.
- ✓ **Skillset.** Amelia has been with Palco for more than five (5) years and has over 11 years of accounting and payroll experience. She earned both her bachelor's and Master of Arts degrees in accounting and is a Certified Public Accountant (CPA). In her tenure with Palco, Amelia has overseen the tax department, enrollment team, project management, and implementation teams. Her vast experience in F/EA is unmatched by competitors and has brought her great success in every role she fills. Amelia understands the predecessors of the FMS business in a way that others cannot compete with, ensuring she will lead a successful implementation like she has several times previously. She has led several complex projects in traditional Medicaid models as well as Managed Care. Most recently, she led the implementation of more than 5,000 clients and 1,000 agency-based vendors into a new FMS and EVV solution in a 90-day period.

### Stephanie Gallagher, F/EA Director

- ✓ Roles and Responsibilities. Stephanie oversees both our processing and tax teams, processing over \$400 million in payroll and \$100 million in vendor payments annually. Her tax team ensures all IRS and state tax accounts are set up correctly in a dozen states, verifies the correct tax amounts are being withheld, and processes all tax reports such as 941, 940, W-2, and 1099s. She works hand-in-hand with our accounting team during internal audits to ensure taxes are being filed timely and correctly. She also assists with financial reporting to support internal audits and quality reviews to ensure full compliance with Generally Accepted Accounting Principles (GAAP) ledger activity.
- Skillset. Stephanie has over 15 years of experience in payroll and invoice payment processing, specifically under the F/EA model. She is a Certified Payroll Professional through the American



Payroll Association, the leading authority on all things payroll and W-2 processing. Stephanie's depth of experience in this industry, coupled with her education, makes her invaluable in understanding the unique intricacies of an F/EA agent or subagent model and applying them on a national level.

### Paula Soll, Billing Manager

- Roles and Responsibilities. Paula will lead the claims and billing team to fulfill West Virginia's program requirements. She currently oversees Medicaid provider enrollment and her team conducts EDI eligibility checks on members and processes prior authorizations when applicable. As a specialist in ANSI X12 requirements and West Virginia Companion Guides, 837 claims are sent via EDI and reprocessed when denied, as applicable. Due to the diligence she has established in her team and their processes, the Palco denial rate is less than 3%. All claims are processed within 2 days.
- Skillset. Paula has over 26 years of experience in Medicaid billing. As a Program Specialist/Claims Examiner for the Montana Department of Health and Human Services, she assisted with developing and coordinating a multi-state team on new Claims Module RFP and Data Governance Module. In addition to her tenure at MDHHS, Paula spent 18 years at Xerox/Conduent/Cognizant, where she worked as a Claims Supervisor and Business Analyst.

### **Toni Rose, Director of Customer Service**

- ✓ Roles and Responsibilities. Toni routinely performs quality assurance measures to monitor our service level, taking care to exceed industry standards for caller hold times, speed-to-answer metrics, and call handle/resolution times. She also develops work shift schedules considering historical reports in compliance with the current programs to obtain optimum staff utilization. The current team is built with a multi-level hierarchy who all perform a variety of activities, such as receiving inbound calls, placing outbound calls, training, assistance with consumer-directed program enrollment, and other support activities. She delivers results on foundation needs, meeting service levels and delivering excellent quality.
- Skillset. Toni has over 30 years of customer service experience within the telecommunications, health care, and financial management sectors. She attended the University of Arkansas at Little Rock with a focus on business/accounting. She is certified in Lean Six Transformation training and can develop her team in leadership skills and essentials. Her team is led with the ability to foster continuous improvement of the call center, analyzing issues, problem solving, and cultivating a culture where everyone's job is to improve their own performance.

### Cody Waits, Enrollment Services and Training Manager

Roles and Responsibilities. Cody monitors and oversees the enrollment of members/employers and DCSWs for this program. He ensures that paperwork is completed timely and accurately, all required background checks are run on workers, and that the employer is properly enrolled with the IRS and West Virginia. Cody is also responsible for establishing accounts for which Palco tax staff will deposit and remit payroll taxes. He routinely presents webinars and training for state and agency personnel on program operations.



✓ Skillset. Cody attended Harding University, receiving a Bachelor of Arts degree in public relations. He initially joined Palco as an account manager, dedicated to meeting the needs of a statewide client, as well as dozens of case management agencies. During his time as account manager, he came to understand how critical training and enrollment are for most clients. He saw how enrollment can be a pain point for many new users and continually offered suggestions for improvement. He was so successful in his role that he was promoted to the enrollment services and training manager, harnessing his client relations knowledge to ensure that our enrollment is efficient and easy to use, and that our training is designed to reach everyone.

### 4.5.1.2, 4.5.1.3 STAFF & VENDOR EXPERIENCE

For 25 years, Palco has played a critical role in fosterina self-directed programs for thousands older adults individuals with physical, intellectual, and developmental disabilities, and traumatic brain injury and their representatives.

Each member of the Palco Team has at least five (5) vears of F/EA **FMS** experience. As you will find, most of our staff are National and State Program Subject Matter Experts on self-direction - and we will leverage that knowledge and historic perspective for West Virginia programs.

Palco's leadership active in the day-to-day operation of the company. We are dedicated partners who value stakeholder involvement in our operations. Our team has excellent mix of accounting, law, communications,

Figure 44: Palco Account Managers

### Palco Account Managers





#### Luis Barraza

luis.barraza@palcofirst.com

- Medium size program management
- Coordination and integration with Support Brokerage
- EVV implementation with 100% program compliance
  - KPI tracking and reporting



#### **Nicole Arens**

nicole.arens@palcofirst.com

- Medium size program management
- Policy and Collaborative Stakeholder engagement expert
- EVV implementation
- Paid Family Leave and sick time implementation
- Ongoing FMS transfer management and data exchange management



#### Savanna Gentry savanna.gentry@palcofirst.com

Medium size program

- management
- · FMS provider transition and program implementation
- Custom application integrations
- report Oversight of a program experiencing tremendous growth



### **Heather Nash**

heather.nash@palcofirst.com

- Management of multiple medium and small programs
- **EVV** implementation
- Unique programs including respite, children with complex medical needs, and Medicaid buy-in



### **Heather Nash** heather.nash@palcofirst.com

- · Management of multiple
- medium and small programs **EVV** implementation
- Unique programs including respite, children with complex medical needs, and Medicaid buy-in



#### Jim Brannen

jim.brannen@palcofirst.com

- Large multi-waiver program
- management State and Managed Care delivery model experience
- **EVV** implementation
- · FMS provider transition and program implementation Vendor and service agency
- program integration







### Luis Barraza

luis.barraza@palcofirst.com

- Close program management and improvement projects with the local AAA and VA
- 1-1 support for veteran families
- Multi-state veteran initiatives



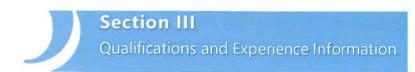
### **Logan Smith**

logan.smith@palcofirst.com

- · Large multi-waiver program management EVV implementation
- Pay and Chase annual project
- Complex enrollment
- background check oversight
- · Facilitation of goods purchasing

organizational and project management, IT and software development, and process engineering knowledge that brings synergy to our operations.

More information about Palco's experience and past performance, including a narrative that demonstrates our experience in providing F/EA FMS services, as the subagent to a government or Vendor F/EA FMS and providing optional RC services, has considered all the requirements, and developed an approach that will support the continued successful implementation of selfdirected services in West Virginia, is included below.



### 4.5.1.4. REFERENCES

### REFERENCE ONE:

### **Ohio Elderly Services Program**

Council on Aging of Southwestern Ohio Monica Schulze **Business Relations Partner** 4601 Malsbary Rd. Blue Ash, OH 45242 513.746.2088

### mschulze@help4seniors.org

Length of time services provided: 2021-Current

Services Provided: Vendor F/EA, Call Center, Billing, Claims & Payroll Processing, Application

Integrations

Level of satisfaction: (3) Very Satisfied

Quote: "The Council on Aging (COA) in Southwestern Ohio has been working with Palco, as of December 2021, as a fiscal intermediary services provider for our consumer directed care clients in our Elderly Service Program (ESP). Based on our partnership and experience working with the Palco team we highly recommend the services of Palco."

### **REFERENCE TWO:**

### **Arkansas Department of Human Services**

Independent Choices Sarah Schmidt **Deputy Director** Division of Provider Services and Quality Assurance P.O. Box 8059, Slot S427 Little Rock, AR 72203 501.320.6555

### sarah.schmidt@dhs.arkansas.gov

Length of time of services provided: 1999 - Current

Services Provided: Vendor F/EA, Call Center, Billing, Claims & Payroll Processing, Support

Coordination

Level of satisfaction: (3) Very Satisfied

Quote: "Palco In. has been a contracted vendor of DPSQA for financial management for approximately 24 years and for counseling services approximately nine years. I can also verify that there are currently no negative contract actions such as corrective action plans or vendor performance reports."



### REFERENCE THREE:

### **Kansas Sunflower Health Plans**

Stephanie Rasmussen Vice President of Long-Term Services and Supports 8325 Lenexa Dr. Lenexa, KS 66214 785.218.9391

### srasmussen@sunflowerhealthplan.com

Length of time of services provided: 2019 - Current

Services Provided: Vendor F/EA, Call Center, Billing, Claims & Payroll Processing, Training, EVV

Level of Satisfaction: (3) Very Satisfied

Quote: "Our clients and staff have been very satisfied with the services provided by Palco and enjoy working with key staff within Palco. The partnership between our offices has produced positive advances for our clients and overall improvements to the health of the program. I would recommend the services of Palco, Inc."



### **√**4.5.1.3, 4.5.2

## **Exceeding Mandatory** Qualification/Experience Requirements



More than 5 years of FMS Experience.



More than 5 years of Support Brokerage Experience.



Serve programs larger than the West Virginia program.

### **OUR APPROACH & EXPERIENCE**

Palco is the only FMS in the industry whose ownership is 100% Certified Public Accountant owned and primarily women-owned and operated. For 25 years, Palco has offered F/EA services to large, statewide programs and has supplemented that service with Support Brokerage for the last 10 years. As CPAs, we take financial and tax reporting seriously. We are proud to have laid the foundation for the F/EA practices still used by the industry today.



# MISSION

OUR Empowering Independence.
Sharpened by experience and amplified by modern technology, Palco advocates for people to live independent lives.

# WHO WE ARE







### PIONEERS

We were the first FMS provider in the country nearly 25 years ago and have helped influence and grow the self-directed landscape to what it is today.

### OUR HOME

Our headquarters are where you are. We serve a nation-wide client base providing tools and solutions right where you are.

### TAX FOUNDATION

Palco's ownership is 100% CPA owned and has over 50 years of public accounting experience.

Our mission is to empower independence. We take great care to hire top talent to achieve that mission. We invest heavily in cuttingedge systems that focus on how to connect users to information as simply as possible. Our business intelligence system unique to this industry and remains in the capable hands of our in-house development Customer experience is at our core. We offer personalized support through a person-centered call center that has proven metrics of satisfaction. We strive to streamline processes for Members or Representative-Employers and their DCSWs - all while remaining flexible ongoing industry changes. However, we never put efficiency over empathy. Because of this commitment. our reputation is one based on trust and integrity.



### CORE **VALUES**

### INDEPENDENCE

Empowering people to live independent and quality lives through original ideas and tools that solve problems.

### INNOVATION

Our all-encompassing tools revolutionize self-direction. providing solutions to business problems through modern technology.

### EXPERTISE

A quarter of a century providing financial management services with unmatched industry experience.

### TRUST

Palco leadership strives for longlasting partnerships forged from integrity, accessibility, and commitment to client achievement.

### **DIVERSITY**

Our experience spans a variety of health and human services contracts. Our business practices honor diverse individuals and perspectives.

### ADVOCACY

Advocating for industry best practices and incorporating feedback from end users to ensure stakeholders at all levels of the service continuum get the resources deserved

In every service we provide and all programs we serve, we value our partnerships with state and local agencies, and take the utmost care in following and applying state regulations and program policy. Partners that have capitalized on our expertise have seen their programs run efficiently and costeffectively. With Palco, you benefit from a seasoned and established partnership dedicated to providing innovation in F/EA and support brokerage.

Figure 45: Palco Partner States

**Arkansas** 

Est. 1999

Colorado

Est. 2019

Kansas

Est. 2019

New Mexico

Est. 2020

Nevada

Ohio Pennsylvania





### -SIMILAR CONTRACTS

### **Arkansas Self-Directed Program**

Arkansas Department of Human Services Division of Provider Services and Quality Assurance Sarah Schmidt, Deputy Director P.O. Box 8059, Slot S427 Little Rock, AR 72203 501.320.6555 sarah.schmidt@dhs.arkansas.gov

Dates of Performance: 1999 - current

### **Arkansas**



### **Current Participants** Served: 2.400

Services Provided: VF/EA services, in-home supports counseling for self-direction, employer and budget authority, F/EA and backup plan training, call center support, reporting, billing and claims processing, self-directed software solutions and other financial management services, CMP web portal services, online enrollment (Intake), electronic timesheet processing (Connect), individualized EVV technical support for program participants.

Target Population Served: Aging adults and Adults with physical disabilities.

### Program Description:

In 1999, Arkansas was chosen to pilot self-direction on a statewide level through the Robert Wood Johnson Foundation. Palco, a Certified Public Accounting firm, was hired in the early days as a consultant to the State and its prime contractor. Palco's experienced tax professionals recommended using Section 3504 of the Internal Revenue Code as a vehicle for program operations. With that, the role of the fiscal/employer agent was born. We were soon hired as the payroll processor and tax reporting subagent for the prime contractor.

As the program grew, so did its successes. IndependentChoices gained national attention, and industry experts turned to Palco for developing the fiscal landscape for self-direction best practices. In 2001, we were asked to step into the role of the general contractor, assuming all VF/EA functions, including operating a toll-free call center, performing enrollment activities, monitoring spending, issuing reports, and much more.



The stabilization under our leadership allowed the state to offer the pilot program statewide. Over the next five years, IndependentChoices grew from just a few hundred participants to nearly 5,000 self-directing members participating in multiple waivers and state plan services. During this time, we also worked on other State initiatives, including two multi-year grant-funded projects with Area Agencies on Aging and the DHS Division of Developmental Disability Services. We achieved many firsts in Arkansas that have been replicated nationally – including the first to pioneer individualized SUTA reporting via aggregate filing and the first to convert all payments to ACH.

In 2013, we began providing support brokerage to the 5,000 program participants. This included inhome training, education, and technical assistance on the rights, risks, and responsibilities of participating in self-direction, how to engage in both budget and employer authority, backup plan development, and fraud and abuse training. Palco was selected because of our positive track record, skill, and trustworthiness with program execution.

Since taking over support brokerage functions, we have seen improved programmatic compliance, utilization of tools that strengthen an individual's ability to direct their care, and overall enhanced participant satisfaction. Each year, we survey both participants and caregivers/workers and are consistently given a 98% satisfaction rating for our VF/EA and in-home skills training services. We currently have over 25 support brokers on staff located strategically throughout the state of Arkansas to assist individuals with managing their budget, complying with EVV, locating, and retaining caregivers, and more.

Through COVID and the concurrent implementation of EVV, our support brokers were instrumental in assisting the population transitioning to the State's chosen EVV vendor. We currently have a **99.75%** participation and compliance with EVV rate, which has considerably helped the State with its federal match.

Arkansas has benefitted from having Palco as the statewide VF/EA and Support Broker vendor for more than 20 years, as we ensure uniformity in reporting and streamlined practices. Moreover, the operational backbone we created and refined has become the model for other states' programs. Palco's expertise in the storage, compilation, and organization of data in a way that assists program developers and decision-makers is widely recognized as VF/EA best practices in self-directed programs across the country. Our impeccable record and performance have earned us invitations to present nationally on the topic of self-direction to other states interested in implementing similar programs.

In the last two decades of working with the program, we have watched the program improve under our leadership in partnership with the Arkansas Department of Human Services. We have been faced with and adapted to a variety of changes, including consolidation and implementation of various waivers; significant program growth in short periods; changes in State software and billing systems; modifications in the statewide delivery system of home and community-based services and supports;



various industry changes, such as IRS changes in reporting, forms, and procedures and Department of Labor overtime and wage reporting changes; overhauls in program policies; implementation of Palco's online self-service portals statewide; and more.

Though the Arkansas program is fee-for-service, it is structured in a way that encompasses both invoice and 837 billing in a capitation model similar to Managed Care. Over the years, the program has undergone several structural renovations, and Palco has assisted the State in those moves each time, without unnecessary change orders.

FDGS was chosen as the Statewide EVV vendor, and Palco was able to quickly adapt current practices with FDGS (as our own vendor) to fit into the State-controlled EVV model. This included aggregation of claims to provide an EVV-compliant solution for the Arkansas self-direction program, meeting the requirements of the 21st Century Cures Act. We have also successfully implemented new state laws on caregiver drug screens and background checks that encompass national provider identification number metrics.

Palco is proud to have pioneered self-direction, which has helped so many in Arkansas and across the country. We currently serve over 2,400 Arkansas self-direction participants and provide payroll services to approximately 3,400 Arkansas self-directed caregiver/workers. At the peak, this program served over 5,000 self-directing participants, all counseled and supported by the Palco team. The program has seen a decrease in size over the last three years due to state policy decisions and waiver changes, but the Palco standard of service has remained the same.

### **Operational Accomplishments**

Implementing EVV with a self-direction population requires patience, intensive training efforts, and exemplary customer support. During the height of the COVID pandemic, we partnered closely with the Arkansas Department of Human Services to transition 2,842 program Participants/Designated Employers and 3,559 self-directing Workers to a service delivery model that included Electronic Visit Verification. Our Customer Support Center fielded 50,737 calls over the course of six (6) months, helping to ease anxiety and the fear of change experienced by many participants and their workers. In addition, our Support Coordination field staff and Customer Support staff participated in hundreds (if not thousands) of individual support calls with program participants during this transition to EVV. Our collective efforts enabled the State to implement EVV as seamlessly as possible.

During the planning and implementation of the American Rescue Plan Act (ARPA) funds distribution, Palco worked closely with the Arkansas Department of Human Services as well as stakeholder organizations that work with the elderly, direct care workers, and disability rights organizations to ensure the funds were disbursed equitably and in a timely fashion that benefited all stakeholders. Regular meetings were facilitated where Palco provided comments and suggested plans to support the disbursement of the funds. The money was ultimately delivered to stakeholders to provide incentives to the direct care workforce for retention and hiring bonuses that will last through 2024. Palco was proud to be a part of the initiative that ensured the self-directed caregiver workforce was included in the payouts and recognized for their commitment as well.



### **Colorado CDASS Program**

Colorado Department of Health Care Policy & Financing Office of Community Living Erin Thatcher Member Directed Program Policy Supervisor 1570 Grant Street Denver, CO 80203-1818 303.866.3641

erin.thatcher@state.co.us

Dates of Performance: 2019 - current

### Colorado



**Current Participants** Served: 800

Services Provided: F/EA services, budget authority training, call center support, reporting, Medicaid billing and claims processing, background checks, timesheet processing, online enrollment (Intake), electronic timesheet processing (Connect), CMP web portal services, web-based training, workers' compensation, EVV, prior authorizations, paid time off, Family Medical Leave.

Target Population Served: Elderly, Blind and Disabled Waiver, Brian Injury Waiver, Mental Health Services Waiver, Spinal Cord Injury Waiver and Supported Living Services Waiver (intellectual and developmental disabilities)

### **Program Description:**

In 2019, Palco began providing F/EA services for the Consumer Directed Attendant Support Services (CDASS) program administered by the Colorado Department of Health Care Policy and Financing. The CDASS program gives participants the ability to direct and manage their workers who provide personal care, homemaker, and health maintenance services, rather than working through an agency. We are currently serving approximately 800 Colorado participants and providing payroll services to 2,300 Colorado self-directed workers. In addition, we provide an independent, compliant EVV solution, supplemented with data aggregation, to the self-directing members in an 837-billing model that interfaces seamlessly with the state MMIS billing services and statewide EVV Aggregator across 5 different waivers.

We work closely with Case Managers and Case Management Agencies on the prior authorization of services. Case Managers utilize our budgeting tool, which includes a Prior Authorization worksheet designed to match the fee-for-service algorithms, and our Case Management Portal to establish a prior authorization request for MMIS. The CDASS budget calculator is a good example of how we can accommodate a sophisticated task-and-hours setup to determine budget allocations including daily rates that compute into a monthly and annual allocation.

In early 2021, an FMS vendor abruptly left the state of Colorado. Given our partnership, the State chose Palco over another vendor present in the State to transition the participants and workers in just three



months' time. We worked closely with the exiting vendor and State program staff to transition historical program data, performing multiple quality reviews to ensure accuracy for payroll, budget, and tax reporting purposes. During this transition, Palco encountered a bifurcated tax year and was successful exchanging data, providing positive web-based training on our systems, and obtaining optimistic enrollment statistics, and we can proudly say that no individual experienced a gap in service.

EVV was implemented for CDASS at the end of 2019 with a complex group of outspoken stakeholders. We worked closely with the State to navigate the complex landscape and provide additional training and educational materials for participants/employers. During the implementation of EVV, leadership participated in several policy workgroups and discussions around the development of an EVV Live-In Exemption process and an EVV Compliance protocol. These unique qualities set apart the approach to EVV that Colorado has taken compared to many other programs nationally. Our experience with these program qualities has been beneficial to our partnerships with other states who are still navigating the full spectrum of what EVV in self-direction looks like.

Colorado has an ever-changing employment law landscape, and Palco is there every step of the way. In 2022, we implemented Paid Time Off (PTO) and paid Family Medical Leave (FML) wages for workers, as part of two new State laws. Palco's Case Management Portal provides state and case management staff visibility of PTO and FML accruals and utilization. As a growing national trend, we have built this component of our system to be customizable and easily implemented for other states as new policy is implemented. We have also proven skillful in our work with county-based local taxes and varying city or county minimum wages across the State. With each change, we work with HCPF and the members to provide the best online user interfaces and training solutions.

### MEMBER SATISFACTION

Since our inception of services in Colorado, Palco has received the highest FMS customer satisfaction rating year over year. Compared to the other FMS vendor operating in this state for these programs, Palco continues to see a higher percentage of respondents rating us with a "5" on a Likert scale where 5 is the highest score possible.

Figure 46: Satisfaction Ratings Summary All FMSs

### Satisfaction Ratings Summary all FMSs

	Palco	PPL	All
Number of surveys mailed	670	3061	3731
Number of surveys returned <sup>2</sup>	124	488	612
Return Rate	18.5%	15.9%	16.4%
% of Answers with highest rating value of 5	62.3%	57.3%	58.3%
My overall satisfaction with my FMS can be described as (average rating, question 6)	4.37	4.37	4.37
Overail weighted average (questions 2-6)	4.36	4.30	4.32

### **Operational Accomplishments**

Between 9/1/21 - present, we have worked closely with HCPF staff, the CDASS training and operations vendor, Case Managers, and Case Management Agencies on five (5) rate revisions, one (1) statewide minimum wage project, and one (1) city-specific minimum wage project. Throughout our contract, we have participated in numerous policy workgroups, including a background check workgroup, rate change workgroup, EVV compliance protocol workgroup, as well as monthly meetings for the Participant-Directed Programs and Policy Collaborative (PDPPC). Our collaboration with the training vendor remains ongoing as we continue to develop content and participate in workshops that help educate self-directing stakeholders about key topics such as taxes, employer responsibilities, and best practices with recruiting and hiring.

Annually, our enrollment department completes a project to recertify each CDASS Attendant's live-in exemption status, which determines whether an Attendant is required to use EVV during the upcoming fiscal year. Every attendant seeking the exemption status must reapply. Palco can handle these largescale and attention-focused projects with ease through our advanced operational guidelines.

We continue to work closely with FDGS to provide an EVV-compliant solution for the CDASS program, meeting the requirements of the 21st Century Cures Act. We also work closely with Sandata, integrating our EVV and billing software with the EVV aggregator for the state of Colorado.



### **Kansas WORK Program**

Kansas Sunflower Health Plans Stephanie Rasmussen Vice President of Long-Term Services and Supports 8325 Lenexa Dr. Lenexa, KS 66214 785.218.9391

srasmussen@sunflowerhealthplan.com

Dates of Performance: 2019 - current

Kansas



**Current Participants Served: 110** 

<u>Services Provided:</u> F/EA services, employer, and budget authority training, call center support, reporting, Medicaid billing, online enrollment (Intake), electronic timesheet processing (Connect), CMP web portal services, web-based training, workers' compensation, EVV.

Target Population Served: Aging adults participating in a Medicaid buy-in service option.

### Program Description:

Palco has worked alongside Sunflower Health Plan, a managed care organization, to deliver F/EA services to consumers eligible for Working Healthy who need assistance with activities of daily living and participate in the KS Work Opportunities Reward Kansans (WORK) self-direction program under a Managed Care model. At inception, Palco was tasked with a fast implementation schedule, which we quickly embraced and were successful in transitioning all services from the exiting vendor. During our time in KS, we have also worked alongside Sunflower and the State to implement EVV for these program stakeholders. The Independent Living Counselors (ILCs), who administer and authorize the services for Participants, utilize the Palco Case Management Portal as their primary tool to monitor and manage how services are delivered. Custom reports have been built within the system that provide the ILCs on-demand access to all the information they regularly need.

When implementing the project, the State required us to tool EVV services in a manner that conformed to Statewide specifications. We adapted quickly and were able to architect a system that met the State's needs with regard to aggregation, without being burdensome to the self-directing users. We can proudly say we have a 100% EVV compliance rate in Kansas.

During our tenure with the program, Palco has provided insight and partnership to Sunflower Health Plans to navigate, and problem solve some unique situations. In 2020, the cost of workers' compensation was becoming a limitation that impacted participants' access to the budgetary funds needed to fill their service needs. Palco advocated and negotiated with national workers' compensation providers to help ensure that Kansas stakeholders received the best possible coverage at a rate that could be afforded by the available Medicaid funds.



The cost of background checks in Kansas is another oddity that Palco has provided accommodations for by billing both initial and five-year renewals via separate invoicing for payment outside of the budget funds. In addition, Participant budgets in Kansas allow for the provision of a carryover funds bucket which can be utilized for services increase or for paid time off. Palco has created system mechanisms for the tracking and monitoring of these carryover funds.

### **Operational Accomplishments**

During a fast implementation window, we provided many online webinar training courses including enrollment training and online timesheet training with participants and workers, training with the Independent Living Counselors (case managers) and Sunflower Support Brokers over a two-week period. We trained vendor agencies in their processes as well. We engaged in an extensive outreach campaign to provide individualized training to participants and workers to ease the transition.

More recently, we worked closely with this MCO to adjust participant budgets ahead of a 1/1/22 rate increase and have also engaged in a couple of recent projects related to background check compliance and worker rates of pay. Each of these projects entailed careful planning, various forms of stakeholder engagement, including individual outreach by Palco enrollment staff and informative eblasts to stakeholders with detailed instructions on next steps.

We work closely with FDGS to provide an EVV-compliant solution for the KS WORK program, meeting the requirements of the 21st Century Cures Act.



### **Nevada HCBS Programs**

Nevada Dept of Health & Human Services, Aging and Disability Services
Courtney Keys
Development Specialist IV/Specialized Unit Supervisor
9670 Gateway Drive, Suite 100
Reno, NV 89521
775.687.2675

ckeys@adsd.nv.gov

Dates of Performance: 2013 - current

### Nevada



**Current Participants Served: 500** 

<u>Services Provided:</u> F/EA services, call center support, reporting, billing, financial management services, online enrollment (Intake), electronic timesheet processing (Connect), CMP web portal services, web-based training, and payment for vendor services.

<u>Target Population Served:</u> Children with developmental disabilities, Autism, and complex medical needs; primarily rural. Veterans.

### **Program Description:**

Since 2013, we have worked with the state of Nevada to serve hundreds of families and children with developmental disabilities.

As this program serves all minors, the Palco system is configured to ensure the proper requirements are in place to ensure a third-party employer of record is always established. In serving this program, we provide webinar-based training to stakeholders and written materials and budgeting tools to case managers for developing person-centered plans.

The first objective that had to be accomplished with this program in 2013 was ensuring participants had a vendor to meet their needs after the exiting vendor of over 10 years left the state abruptly without an FMS to process payroll for the caregivers and vendors actively providing services. At inception, every self-directing worker had been transitioned to a 1099 status by the State, who was desperate to ensure there was not a loss of services. Palco worked quickly to get everyone set back up properly as self-directing employers/workers in a short amount of time. We spent countless hours with the Nevada tax agencies sorting through these issues. We led the State through this process seamlessly, and families praised Palco during the transition and after.

Nevada offers a unique requirement that requires all vendor services to be paid first, and workers second. This quality measure helps ensure that vendors providing more professional services are always paid, and budget funds do not become exhausted prematurely by family caregiver hours. The Palco system is configured to automatically handle this kind of program rule because of our customizable technology.

Throughout our tenure with the State, we have assisted with other programs, including serving as the statewide FMS for the Children with Autism program that served about 400 kids across the State. We are also the FMS for a Veterans-Directed program within the State. This program also operates in jurisdictions outside of Nevada, such as Utah and Idaho. Our customizable system is able to handle out-of-state taxes for these individuals, even though there is no state income tax in Nevada.

Our partners in Nevada routinely turn to Palco for cost savings and creative approaches to serve their clients. Together, we come up with unique solutions to meet the needs of the families, while allowing them a voice in their care. We continually accommodate program growth and have doubled our population size since entering the State.

### **Operational Accomplishments**

We transitioned this program from an incumbent of 10+ years and as such, we encountered a bifurcated tax year and various unreported and incorrect tax withholdings and filings by the prior vendor. We spent countless hours with the Nevada tax agencies sorting through these issues. We led the State through this process seamlessly, and families praised Palco during the transition and thereafter. We currently serve approximately 500 families, and we continue to receive repeat business in Nevada.

The Nevada program, being primarily rural populations, faced struggles with the adoption of an online time capturing system. Palco was successful in partnering with program participants and their support staff to move to and begin utilizing a new system for time capture that is 100% electronic. Additionally, stakeholders are now familiar with and utilizing the Palco online enrollment application which provides them with an efficient and error-proof mechanism for onboarding caregivers as needed.



### **New Mexico Programs**

Conduent Kevin Norris Account Executive PO Box 27460 Albuquerque, NM 87125-7460 505.639.8808

kevin.norris@conduent.com

Dates of Performance: 2020 - current

### **New Mexico**



**Current Participants Served: 5,250** 

<u>Services Provided:</u> F/EA services, system access and integration, reporting, online enrollment (Intake), electronic timesheet processing (Connect), CMP web portal services, payments for vendor goods and services, financial management services, workers' compensation, EVV for both self-direction and agency-based care in fee-for-service and Managed Care service delivery models.

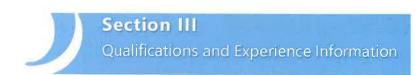
<u>Target Population Served:</u> Aging Adults, Adults with Physical Disabilities, Adults with Developmental Disabilities, Adults with Traumatic Brain Injury and Adults living with AIDS, Children with Developmental Disabilities, Medically Fragile Children.

### Program Description:

Palco currently provides F/EA services for three self-directing programs in New Mexico, serving over 4,700 participants and providing payroll services to 12,200 self-directed workers and 1,500 vendors. Palco provides the infrastructure and support for all operational duties of these self-directing programs which include three (3) state waivers and a managed care program with three (3) current Managed Care Organizations. We also support hundreds of provider agencies in their efforts to comply with EVV and the 21<sup>st</sup> Century Cures Act by providing training to agency administrators, assisting with their EVV onboarding, set up, and general technical support as needed.

At the inception of this contract, in 2020, Palco successfully transitioned 4,000 participants from another FMS entity over the course of a short seven-week transition period. This transition was successful despite a hostile exiting vendor who refused to comply with a data exchange and the need for new infrastructure to be implemented. Palco was able to ensure no gaps in services occurred and that services continued without any disruption. During this time, Palco also partnered with the State to implement a brand-new waiver with self-directing services for a new group of individuals seeking long-term services and support.

Additionally, beyond the self-direction population, Palco worked in tandem with the State to provide technical EVV services to over 2,000 participants and 200 provider agencies in a program that spanned three waivers. Palco stepped up quickly to assist the State with this implementation as the State was threatened with the loss of their federal match. Because of our EVV knowledge and IT expertise, we



were also able to assist the State with providing a compliant EVV solution for a section of their agencybased care services which was also without EVV at the federal deadline. Bridging the gap as a translation service, our IT capabilities handled the data between the MMIS and EVV systems with elegant accuracy. To further ensure success, we provided training to the agency staff and their thousands of workers on EVV systems and processes.

We are currently engaged in a phase 2 development process to streamline Medicaid billing and claims processing to tighten programmatic integrity, as well as introduce frequent pre-payroll eligibility checks to enhance current program operations. Additionally, our system will be the primary tool used by case managers, assessors, and Managed Care agencies to perform their daily tasks, such as recording the outcome of assessments, recording progress notes, making budget revisions, designating paid time off for workers, and more.

These enhancements are architected by the knowledgeable and experienced Palco product and project teams who are helping the State and Managed Care Organizations problem solve and think forward to proactively create solutions.

We work closely with FDGS, to provide an EVV-compliant solution for the fee-for-service self-directing New Mexico programs, meeting the requirements of the 21st Century Cures Act.

### **Operational Accomplishments**

One of the programs Palco supports in New Mexico is the Self-Directed Community Benefit (SDCB) program available to eligible individuals enrolled in Centennial Care, New Mexico's Medicaid program. Centennial Care services are provided by three (3) managed care organizations (MCOs). Since the inception of our contract in New Mexico, we have worked closely with the State, all three MCOs, and a variety of stakeholders to gather feedback on specific programmatic and system design requirements, entertain enhancement requests, and perform numerous system demonstrations as we work to make their requests a reality. Our project management and product development teams have worked closely with all stakeholders to ensure all details are accounted for and all parties have their input voiced and considered. Through this process, we have been instrumental in helping the MCOs streamline processes and improve efficiencies through collaboration.

We meet weekly with the MCOs and daily with the State. We collaborate on stakeholder engagement opportunities including member communication and training. We also work through potential policy decisions and the downstream implications during regular meetings with the MCOs and the State.



### **Ohio Elderly Services Program**

Council on Aging of Southwestern Ohio Monica Schulze **Business Relations Partner** 4601 Malsbary Rd. Blue Ash, OH 45242 513.746.2088 mschulze@help4seniors.org

Dates of Performance: 2022 - current

Ohio



**Current Participants** Served: 824

Services Provided: F/EA services, system access and integration, call center support, reporting, online enrollment (Intake), electronic timesheet processing (Connect), financial management services, workers' compensation.

Target Population Served: Older Adults

### Program Description:

Palco began providing services to approximately 800 clients in the Elderly Services Program, administered by the OH Council on Aging (COA) in July 2022. Palco provides infrastructure and support for all operational duties of this self-directing program. During the implementation phase we transitioned existing clients from another FMS entity over the course of a few weeks. A multi-stage data exchange was completed to ensure a minimal burden to existing program participants and smooth transition.

In addition to the traditional F/EA services provided, Palco has developed custom technology solutions to partner with the COA to launch their caregiver smart device application, AddnAide. The application provides a mechanism for self-directing participants to match and connect with individuals in their area seeking caregiver employment. Through a person-centered process, the application works to bridge gaps and combat the caregiver workforce crisis our communities are facing. The data feeds implemented by Palco allow us to quickly learn of new aides an employer seeks to hire and prescreen unmatched aides by initiating the required background check process. These workflows expedite the enrollment and hiring process to get caregivers providing care as quickly as possible. Once an aide is hired, the app collects their time entry data, and the details are easily exchanged in real-time to the Palco system to ensure we have accurate data for payroll processing and tax reporting. This will also create a seamless integration for program stakeholders to submit and manage their time. The technical solutions and capabilities to integrate with the COA in-house developed software was a service unmatched by our competitors, making Palco the prime candidate for their chosen FMS partner.



### Operational Accomplishments

Post implementation, Palco has strategically worked with our COA partners to improve the criminal background check process and eliminate barriers to services that are sometimes unintentionally created by program policy developments. The Palco enrollment specialist team has created resources and partnerships with local Ohio entities who perform background checks (including national FBI fingerprinting) to provide options to self-directing caregivers in the process of enrolling. Additionally, we have developed enhanced processes for AddNAide users (mentioned above) who are not yet "matched" with a self-directing employer but hope to be. Palco works with these individuals to get their background check requirements completed during the creation of their initial profile so that they can begin working for a participant almost immediately after they are chosen to be hired. This partnership and process improvement has been a catalyst for expediting overall enrollment times and ensuring person-centered practices for recruiting and hiring workers can be achieved. Getting job seekers employed quickly is critical to improving the direct care workforce crisis, which Palco is passionate about.



### **Pennsylvania Self-Directed Programs**

Pennsylvania Department of Human Services Office of Developmental Programs Charles R. Frick, Section Chief Division of Program Operations, Bureau of Community Services 625 Forster St Harrisburg, PA 17120 717.783.8751 cfrick@pa.gov

Pennsylvania



**Current Participants** Served: 1.100

Dates of Performance: 2018 - current

Services Provided: VF/EA services, employer and budget authority training, call center support, Medicaid billing and claims processing, timesheet processing, background checks, online enrollment (Intake), electronic timesheet processing (Connect), CMP web portal services, in-person and web-based training, workers' compensation, a compliant EVV solution, integration with EVV aggregator (Sandata), processing payments for participant-directed goods and services, processing payments for vendor services, and reporting.

Target Population Served: Adults with Developmental Disabilities

### **Program Description:**

In 2018, Palco began providing VF/EA services for three (3) waiver programs administered by the Pennsylvania Department of Human Services, Office of Developmental Programs (ODP). Each of these waivers offers a large array of services to its population, with Palco currently serving over 1,000 participants and providing payroll services to over 3,700 Service Support Professionals. These services have unique requirements, with some services billed with daily units and others at 15-minute increments/units. Our timesheet portal (Connect) allows users to select only services and related modifiers for which they are authorized and credentialed and includes built in validations to prevent over-billing.

The Pennsylvania program landscape is comprised of many vocal stakeholder and advocacy groups, which Palco has established relationships with and built a bridge of trust and collaboration. At implementation, the program was contentious and received lots of negative scrutiny because of past vendors' performance. Palco was able to achieve a smooth and quiet transition which began to reestablish trust with stakeholders and the State. During the last 5 years, the program has reestablished a baseline of solid services and key Palco staff have close working relationships with the support coordinators and support brokers overseeing the services. We have also significantly improved the tax filing process and cleaned up tax filings performed by the prior vendor, which has virtually eliminated tax notices that were being sent to employers prior to the Palco implementation.

Some of the complexities of the Pennsylvania program include a large volume of service codes (over 60) all requiring EVV, complex overtime rules, local taxes in several areas of the state, budget cap funding issues, and integrations with required system data feeds related to budget changes. With a Palco partnership comes access to creative solutions that many FMS competitors may not have the experience and capabilities to provide. For example, data integration feeds with our EVV vendor ensure that stakeholders only have access to select service codes within the EVV system that they are approved to provide. When necessary, Palco was able to offer the State the ability to do base funding through an invoicing model which has improved their budget cap funding issues and helped bring the programs utilization to a much steadier margin. Processes like a 276/277 EDI exchange offer a high degree of program integrity that not many FMS vendors can achieve.

One service of special attention for ODP is transportation. To ensure adequate access to the community, participants who qualify are given the ability to self-direct the delivery of the transportation services they need. Palco has operationalized the delivery of several services to support the provision of these services including partnerships with the local entities to purchase and issue SEPTA bus passes, paying mileage reimbursements, and funding accounts for the use of UBER.

### Operational Accomplishments

In Pennsylvania, we work with several stakeholder groups at the local, regional, and state level. In 2018, we engaged a diverse stakeholder group to form a working Advisory Board consisting of self-directing Members, Common Law Employers, Support Brokers, and ODP staff. This group continues to meet quarterly to review enrollment patterns, service oversight, and upcoming initiatives impacting the program. With a diverse set of stakeholders present, we often discuss grass-roots issues facing the self-direction community and brainstorm innovative solutions and approaches.

We also provide outreach and educational presentations to local entities including county staff, support broker organizations, and interested parties on the benefits of self-direction and the services we offer as a VF/EA FMS provider. Additionally, these groups have requested our participation in panel discussions at local and state conferences and symposiums on self-direction.

We provide an EVV-compliant solution for the ODP participant-directed services programs, meeting the requirements of the 21st Century Cures Act. We also work closely with Sandata, integrating our EVV and billing software with the EVV aggregator for the state of Pennsylvania.



### **Veterans-Directed HCBS Programs**

State of New Mexico
Anthony Romero
Acting Director, Consumer and Elder Rights
PO Box 27118
Santa Fe, NM 87502
505.795.1196

anthony.romero12@state.nm.us

Dates of Performance: 2016 - current

### **New Mexico Veterans**



# **Current Participants Served: 15**

<u>Services Provided:</u> F/EA services, budget training, call center support, reporting, billing and claims processing, financial management services.

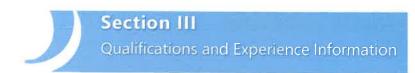
Target Population Served: Older Adult Veterans

<u>Program Description (Sample Projects):</u> In 2009, Palco became the country's first Fiscal Employer Agent (F/EA) for the U.S. Department of Veterans Affairs-funded veteran-directed-HCBS program, implemented by the Central Texas Area Agency on Aging. Since that time, we expanded our delivery of F/EA supports to other VD-HCBS programs, and we continue to serve a Veterans program in New Mexico and Nevada. We not only perform F/EA services and call center support, but we also provide training and technical assistance for support staff.

### **Operational Accomplishments**

Like many VD-HCBS programs, New Mexico is faced with a high number of individuals seeking services and limited resources. Palco has worked closely with the staff at the Aging & Disability Resource Center (ADRC) to prepare for growth and to meet some ambitious expansion goals. In 2021, when preparing for those goals, Palco partnered to add operational responsibilities to our contract including customer support and enrollment support. These services will benefit veterans joining the program as the ADRC is able to increase their program size and open up wait lists while working with their local Veteran Administration.

During the last 13 years, Palco has also partnered with many local aging and disability resource centers to assist with small start-up programs in preparation to transition them to another vendor. In addition to the New Mexico veteran program, Palco has served several locations across the state of Texas, two regions in Arkansas, Louisiana, and Nevada. We are passionate about the VD-HCBS model seeing growth. The central TX veteran program was the first VD-HCBS program in the country and was served by Palco since its inception for over 10 years.



### **OTHER SERVICES AND INITIATIVES**

Palco has worked with non-profits and state governments to deliver home and community-based support to a variety of programs, including pro tempore or grant-funded programs. Partners continually turn to us to assist in program development and implementation, design systems with quality controls, and deliver financial services and person-centered training. In addition, our parent company has performed a variety of payroll, accounting, and tax services for hundreds of entities across multiple states for more than 25 years.

Our goal is to be the best FMS partner in the sector. You can count on integrity, technology, and customer service underscored by collaboration. We know that the best work evolves from listening to our clients and having the established discipline to define the solution and processes which enable improvement. Figure 47: Year-Over-Year (YOY) Growth

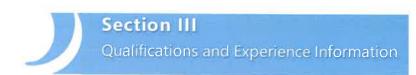
Our year-over-year (YOY) growth demonstrates solvent financial health, measured growth, and our scalability to meet the demand of any sized program see Figure 47.

Additional insights from 2015 - -2020 show steady productivity, absorption of expansion, operating efficiency. This is only measurement of Palco's organizational health and program performance.

We like to sav that organizational health is composed of three things:

Year	Gross Pay	Employers	Employees
2022	\$201,377,392.00	9,870	23,078
2021	\$184,160,195.86	9,064	14,120
2020	\$83,215,731.84	4,985	7,063
2019	\$66,518,644.66	5,179	7,189
2018	\$60,987,318.51	7,064	8,900
2017	\$47,337,183.65	6,128	7,543
2016	\$41,273,821.64	5,889	7,480
2015	\$41,541,090.68	5,762	4,550

- How well we align around a common strategy.
- How our strategy translates down into the work environment.
- How well we renew over time, an indicator of two things:
  - o Looking outside, staying in tune with our clients and their program members, and
  - o Having an internal innovation engine so those insights are incorporated into the process, product, and/or service delivery within Palco and turned into something useful in terms of driving innovation and new capabilities to improve the lives of the people we serve.



Palco believes we are corporate citizens in the communities we serve and work to create a positive impact by creating short-term and long-term value for the entire community of stakeholders. Because values and culture are inextricably linked, talking about them is not enough. Our leadership acts in line with our company values.

Further, times of crisis test the practices of a company, its partners, and maybe most importantly, their dedication to the task at hand. Palco has successful FMS relationships in seven states, and together with partners like you, we have successfully managed the major health care crisis COVID-19 forced us to face. We have been tested and have grasped that we can meet the demand of unforeseen challenges and, even more important, meet any challenge as a team.

### **AMERICAN RESCUE PLAN ACT**

In 2021 and 2022, Palco has taken the initiative to partner with states to administer funds as part of the American Rescue Plan Act (ARPA) and ensure seamless payments to stakeholders were made. Over \$50 million in ARPA funding was dispersed in 2022 and 2023 to support the efforts of our state partners. When you partner with Palco as your FMS, you get more than just payroll. Palco staff are dedicated and active members in workgroups and stakeholder engagement that are focused on program enhancements and initiatives seeking to enhance the lives of the people we serve and those direct support professionals whose compassion and initiative make member independence a reality.

### **Appendices**

- Appendix 1 Sample Policy & Procedures Manual
- Appendix 2 GANTT Chart & Implementation Plan
- Appendix 3 Member/Representative-Employer Enrollment Packet
- Appendix 4 DCSW Enrollment Packet
- Appendix 5 Resource Consultant Tools (main, specialty, extra, assessment, evaluation)
- Appendix 6 Post Training Assessment & Evaluation
- Appendix 7 Disaster Recovery Plan/Business Continuity Plan
- Appendix 8 Resumes

# **APPENDIX 1**

# SAMPLE POLICIES & PROCEDURES MANUAL



ARKANSAS
SELFDIRECTION
PROGRAMS

101

AR & Independent Choices

SD-101 Revised April 2021

D)PALCO

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# Self-Direction in Arkansas

Self-direction services are home and community-based services (HCBS) that help people—of all ages with different disabilities—live independent lives in their own homes and communities. They maintain their independence by choosing the mix of services and supports that work best for them. Self-direction empowers each program participant to expand their degree of choice and control over decisions made about their long-term services and support in a highly personalized manner.

# **Administrative Structure**

Self-direction provided in Arkansas is through a state plan service uncler 1915(j) of the Social Security Act. The state plan, IndependentChoices, is operated by the Divis on of Provider Services and Quality Assurance (DPSQA) with Support from the Division of Aging, Auult and Behavioral Health Services (DAABHS).

As the program administrators, DPSQA works a recity with Palco regarding participant enrollment, funding, policy guidelines, eligibility and con pensation. However, there are other entities that contribute to participant enrollment for the program.

- 1. DPSQA Program operation
  - a. Monitors program compliance
  - b. Provides participant referral
  - c. Creates participant funding
  - d. Checks elig. bility
- 2. DAABHS C versees the county nurses. Their role is to promote participant health, safety and independence through the program.
  - a. Us is Task and Hours Standards to determine level of medical necessity
    - i. Determines budget for self-directed services
- 3. Ootum DHS Independent Assessment contractor
  - a. Complete in-home assessments and reassessments
  - b. Assessments determine participant Tier Level
- 4. FISERV DHS Independent Contractor
  - a. Maintains AuthentiCare system
    - i. logs all EVV points of data required by Federal Mandate

- 5. Gainwell Technologies DHS contractor that maintains the Medicaid Management Information System (MMIS) which:
  - a. Process Support Coordinator claims
    - i. Monitoring visits
    - ii. New employer training visits
  - b. Runs-monthly-capitation payments, or participant funding, also known LS NA's.
  - c. Process monthly fees, as stated in Counseling and FMS (Financial Monagonient Services) contracts
  - d. Assigns PIN (Practitioner Identification Number) to caregivers

# **Arkansas Self-Direction Programs**

In 1998, Arkansas was one of the three Robert Wood John. on funded Cash and Counseling Demonstration and Evaluation states that implemented part cipant-directed services for older adults and individuals with disabilities using the Vendor Fiscal/Employer Agent (VF/EA) Financial Management Services model.

Palco has been providing VF/EA FMS to Arkansas s since the inception of its participantdirected program, IndependentChoics - first as a sub-contractor, then as general contractor in 2003. During program implementation, Palco staff worked with several national experts, and our input helped create the orerational backbone for the delivery of VF/EA FMS services for the IndependentChoices Program, in Arkansas.

The IndependentChoices program is a state plan which offers Medicaid-eligible individuals who are elderly and individuals with disabilities an opportunity to self-direct their personal assistant services. The program services persons who are 18 years of age, eligible for Medicaid and medically eligible to receive personal assistance services.

The APChoices Program began January 1, 2016. The program is the combination of the Elde. Choices and Alternatives for Adults with Physical Disabilities (AAPD) waivers. The waiver offers cirtain home and community-based outpatient services as an alternative to nursing home placement. These services are available to people 21 through 64 years of age who are determined to have a physical disability, 65 years of age or older and require an intermediate level of care in a nursing facility.

# **Eligibility**

Participation in the program is completely voluntary. To become eligible for this program, participants must meet the following requirements:

- 1. Be eligible for participation in the Arkansas Medicaid Program in a category that allows for self-direction, which includes meeting various financial and needs-based requirements.
- 2. Be eligible to receive one of the following two (2) services:
  - a. Meet an institutional level of care if they require assistance with two (2) or more activities of daily living (ADL's), also known as being eligible for long Term Services and Supports (LTSS)
  - b. Meet eligibility requirements for State Plan personal fair services; provided to individuals who are Medicaid-eligible, choose to salf an act, and need assistance with one (1) ADL (Activities of Daily Living).
- 3. Understand the rights, risks, and responsibilities of nanaging one's own care with a spending allowance; or, if unable to make decisions independently, have a willing representative who understands the rights, risks, and responsibilities of managing the care of the participant with an allowance
- 4. Successfully complete a training program designed to assure that the participant or representative will be able to succes. Fully irect the work of a directly hired personal assistant
- 5. Follow the requirements of the ישכו (S) (S) If Directed Services with Budget) program, which includes not receiving duplicative services through another Medicaid category, such as hospital services; and not esiding in a group home.

# Changes in Eligibility

## Reassessments

Reassessments are required every 12 months for participants receiving direct-care services.

Based on the results of the assessment or reassessment, the RN will complete the Task and Hour Standards to de 'elop a plan of care which calculates the amount of the budget. This amount is communicated to Palco at the time of referral and when a new reassessment and plan of care are developed. The end date associated with the budget determination will be the date of the next requireo reassessment.

When a reassessment is completed, DPSQA will send the budget amount to Palco for entry into The Case Manager Portal (CMP) and the assigned Supports Coordinator is alerted. If the change is significant, it may trigger a home visit.

# Transition from Self-Direction

The participant must be offered their choice of certified providers in the participant's service delivery area when it is necessary for the participant to be transitioned to agency services. If the participant is unable or unwilling to choose a provider, they may allow their representative to choose for them. If no representative is available to make a choice, the participant will be assigned to a provider on a rotating basis. In instances where there is only one provider in the area, the participan will be assigned to that agency.

# Disenrollment

This section highlights the primary reasons for program disenrollment:

- ✓ Non-Compliance with Program Policy
  - o This may include underutilization, failing to meet with So, failing to complete reassessments and suspected of either fraud, waste or abuse
- Loss of Medicaid Eligibility or Eligibility for Personal Care/LTSS
  - o Participants must remain Medicaid Aligibante continue participation in self-direction. They are advised to report any changes in the amount of household income or resources to the DHS county office in the county office closes the Medicaid case of a participant, DPSQA will be notified and DHS-3330 and will subsequently notify Palco. If at any time, it is determined that personal care or LTSS is not necessary for a participant DPSQA will be notified and DPSQA will remove the Waiver Indicators and close the participation. Falce will be notified.

# Institutionalization

o If at any time a participant requires placement in a long-term care facility, DPSQA will be notified, and he case will be closed if the participant is unable to return home within 30 'ay.' No monthly allowance will be provided during the time of institutionalization.

# Voluntar, つisenrollment

The participant may elect to discontinue participation in self-direction at any time. The reasons for this decision will be explored by the Support Coordinator, who will attempt to identify and resolve any problems to promote continued satisfaction with the program. However, if the participant remains interested in voluntary disenrollment, DPSQA will be notified, and the participant will be transitioned to traditional agency services.

# Absences from the Home

o Self-directed services are designed to be provided in the home of the participant. The services may be provided outside the participant's home, if the participant's physician authorizes the service during a trip or vacation. If the employee travels with a participant, travel costs for this employee cannot be paid from the budget, although services as outlined in the service plan may be received during the trip may be paid from the budget. Care outside of the home cannot exceed over 30 days.

At any time that DPSQA and Palco feel that the health, safety, and well-being of the perticipant is compromised by continued participation in the self-directed program, the participant may be transitioned to the traditional agency services. Should the participant's ability to a rect their own care diminish to a point where they can no longer do so and they cannot id intify a trusted support person to assist direct the care, the participant may be transitioned to traditional agency services. The following chart lists the reasons for disenrollment:

Disenrollment Codes (Active		
	Participants)	
Code	Reason	
10	Deceased	
20	Nursing Home / Assisted Living	
30	Lost Medicaid Eligibility	
40	Moved Out Of State	
50	Out Of Home Over 30 days	
60	Agency Services	
70	Could Not Hire Attendant	
	Unable To Contact Per	
80	DHS/PALCO	
90	Medically Ineligible For THo	
100	Expired Plan Of Care	
110	IBHM Closures	
120	Underutilizati n	
130	Unable 1) Contact For THS	
140	Unabla to Contact Per OPTUM	
150	er FALCO Change Status Form	
160	n Anc ther Waiver Program	
170	Non-Compliance	
18c	Volunteered Disenrollment	
190	Medically Ineligible Per OPTUM	
200	Unable to Self-Direct	
210	AFMC Denial	
220	EVV	

Refusal Coult (U Icertified Participants)				
Code Reason				
1	しつable To Contact Per OPTUM			
2	Unable To Contact Per DHS/PALCO			
3	Unable To Contact For THS			
4	Deceased			
5	Unable To Self-Direct			
6	Nursing Home/Assisted Living			
7	Medically Ineligible Per Optum			
8	Out Of Home Over 30 Days			
9	Lost Medicaid Eligibility			
10	Exceeds Enrollment			
11	Could Not Hire Attendant			
12	Medically Ineligible Per THS			
13	AFMC Denial			
14	EVV			
20	Ineligible Referral			
21	Remain / Use Agency			
25	Voluntary Withdrawal			
26	Other Waiver Program			
31	Declined Assessment Per OPTUM			
33	Per PALCO Change Status Form			
34	Non-Compliance			

# Hearings & Appeals

Final disapproval decisions will be sent to the participant in writing, including steps to follow if the participant disagrees with the decision. Also, the participant always has the right to appeal the decision and ask for a Fair Hearing.

It is important that the participant watch the timeframes in which they can file an appeal. Letters mailed to the participant from DHS should all be opened immediately. The date that the letter was issued to the participant becomes the beginning date of the time during which the participant can file an appeal. If the participant files an appeal after the time has expired, their appeal will not be accepted.

Appeal forms for a review with the Office of Appeals and Hearings are available in the local county office. Some of the reasons for filing a request for administrative rovie v ar a.

- Loss of Medicaid: If the Department of Human Ser ices (DI S) County Office decides the participant is not eligible to receive Medicaid, they have a right to appeal this in writing. The appeal must be made within 30 days of the da a crithe notice they are sent. The DHS County Office making the decision will help with your appeal or they can write to Appeals and Hearing, P.O. Box 1437, Slot N401, Little Pork, AR 72203. If a participant's loss of Medicaid is a result of their loss of Sup, Is need to file an appeal through the address show on the letter participant received from Social Security.
- Involuntary removal from STSB: If for any reason a participant is notified in writing that they may not continue receiving the monthly cash allowance they will have 30 days to file an appeal of this decision. Participant must appeal in writing to DPSQA, SDSB Program, P.O. Box 1437, Stat S529, Little Rock, AR 72203. If they lose their appeal, they may file for an Administrative Pearing through the DHS County Office or Appeals and Hearings at the address listed above within 30 days of the date of the decision. Note: If the Nurse or your Physician determines participant is not eligible for personal assistance services, this is not appralarie.
- Jenial of request for extension of hours by Utilization Review: If the number of hours of personal assistance services recommended for participant exceeds 14.75, the Plan of Care is sent to Utilization Review for approval of the additional hours. If the request is denied by Utilization Review, the participant will be sent a letter. To appeal this decision participants must follow the directions that are listed on the letter. Participant has 30 days from the date of the letter to appeal the decision.
- Problems or disagreements with the Support Coordinator or fiscal agent: If a participant has a problem with their Support Coordinator, nurse or bookkeeper, they may call Palco to assist the participant in resolving the problem.

- Tier Level from assessment: The applicant can appeal their assessment if they are placed in a tier level that is not eligible for direct-care services. Tier levels are:
  - **Tier 0** Not eligible for services
  - Tier 1- IndependentChoices
  - Tier 2- ArChoices
  - Tier 3- Nursing home, not eligible for self-directed care services

The participant has the right to appeal a decision with which they disagree. Filing an appeal gives the participant the opportunity to have a decision reviewed. In the Department of Human Services (DHS) where the decision is appealed depends on the type of decision and the office from which the decision was made.

If the participant disagrees with the number of hours of personal assistance services the nurse recommends when your assessment is completed, the participan is provided a letter with instructions on how to appeal their assessment. If after the review has been completed and the participant continues to be dissatisfied with their Plan of Care, then she/he may request a hearing.

Where they file their appeal is dependent upon w. a. accision they are appealing. For example:

- ✓ A recommendation for personal assistances rvices hours exceeding 14.75 requires approval from Utilization Review (UR). If UP decides participant's condition does not require as many hours of personal assistance se vices as had been recommended by the SDSB Nurse, they will file an appeal with UR as indicated on the letter they are sent denying benefits.
- ✓ Loss of Medicaid eligibility vould be appealed to the Office of Appeals and Hearings.

# Mandatory Reporter of Fraud and Abuse

A report of abuse, negiaclor exploitation of an endangered adult residing in a privately owned or rented home in the community shall be made to the Arkansas Adult Protective Services (APS). The APS toll-free trieptone number is 1-800-482-8049. Employees of Palco including Regional Managers and Support Coordinators at all levels are mandatory reporters of suspected abuse.

# **Program Terminology**

The terminology and delegation of duties specific to the Arkansas Self-Directed programs is included in this section

# Assessment

This is a needs-based examination and evaluation by the Optum nurse that determine: the level of required services needed by a particular individual.

# **Attendant Services**

A term used to describe a variety of in-home services, including assistance with daily activities and housekeeping. These are services provided directly for the participant by the caregiver (employee) and include, but are not limited to, personal care services, managing inances, communication, shopping and errands, light housekeeping/chores, redirection, nemary care support, supervision of activities

# **Budaet**

The amount of available funding for each individual participant. The individual budget comes from two separate steps. The Optum nurse who con ole es an assessment, determines eligibility, and establishes the Tier Level of the participant The ask and hours are completed with the RN, and this determines the amount of the budget basid on needs.

# Caregiver

The caregiver is the individual chosen by the participant to provide attendant services. The caregiver is the participant's employee.

# Cash Expenditure Plan (CEP)

The CEP describes the se. vices, supports and goods the participant needs to live in the community the way he or sie v ants, while utilizing a budget.

# **DPSOA**

Department of Provider Services and Quality Assurance - Palco deals with directly

# DAABHS

Division of Aging and Behavioral Services - nursing side RNs for the state

# **Employee**

The directly hired worker(s) who are the employees of the participant. The employee shall follow the job description and direction of the employer.

# **Employer**

The participant (or their designated Representative) is the employer. The employer hires workers for the home and complies with all program policies. The employer also accepts responsibility for hiring and managing employees by assigning tasks, setting schedules, evaluating work performance, and taking disciplinary action when necessary. The employer is also sometimes referred to as the "employer of record."

# **Financial Management Services**

A service provided to self-directing participants by Palco. Palco acts as the employer's agent to pay timesheets, withhold and pay taxes for the employer and employee, and pay other invoices as directed on the CEP.

# **Individualized Budget**

The budget is created after an individual service plan is completed and the services that an individual needs are identified. The Support Coordinator (ST) creates the budget. It includes all the services that will be provided to the participant and approved.

# Palco

Palco is the Vendor Fiscal/Employer Agent (VF, CA MS) and is responsible for enrollment processing, paying workers, withholding and filing employers, and providing other administrative functions.

# **Participant**

All participants enrolled in the ar project in kansas Medicaid SDSB Program, who meet requirements for the program and state an interest ir. Self-Directed services.

# **Personal Care Services**

These are services provided directly for the participant and include, but are not limited to, assistance in and out of the shower or path tub, any assistance during the bathing process, assistance in getting on/off the toilet, brushing teeth/dentures, personal grooming tasks and dressing as well as providing verbal prompts to taking medication or placing pills from the medication minder into the participan is haids and verbally reminding or physically guiding the participant to take them.

# Provisional Period

The 6-month period following the active date is referred to as the provisional period. During this time, monitoring is intensive to ensure that the participant is experiencing successful outcomes on the SDSB model.

# Representative (Surrogate EOR)

A person that the participant formally designates to help make decisions on their behalf. This individual should know the participant well enough to make decisions that the participant would make if able. They will serve as the legal employer of record on behalf of the Participant.

# **Self-Determination**

A broad concept that means the participant has overall control of their life and ability to take part in society. The participant has the ability to succeed or fail on their own decisions. Solf-determination rests on five basic principles: 1) freedom to lead a meaningful life in the community; 2) authority over dollars needed for support; 3) support to organize resources in ways that are life-enhancing and meaningful; 4) responsibility for the wise use of public dollars; and 5' confirmation of the important leadership that self-advocates must hold in a newly designed systom.

# **Self-Direction**

A process whereby individuals with disabilities and, where appropriate, families, have high levels of direct involvement, control and choice in identifying, accessing and managing the services they obtain to meet their personal assistance and other health-related needs. Self-direction, participant direction and consumer direction are sometimes used in archangeably.

# **Self-Directed Service Option**

Eligible participants have the option to control and direct services, support and Medicaid funds, using the essential elements of person centered planning, individual budgeting, participant protections, and quality assurance and quality improvement.

# Support Coordinator (SC)

A trained individual who assists participants with understanding the requirements of self-direction, developing a service and opending plan, and identifying where or how the developed service and support plan can be imp. mented.

# Vendor Fiscal/Employer Agent Financial Management Services (VF/EA FMS)

VF/EA FM, is a participant-directed service delivery approach that gives participants control over the services that they receive. In VF/EA FMS, participants may serve as their own Employer of Record (EOR) and designate another individual to serve as EOR.

# **Support Coordination**

**Support Coordinators** 

Palco's mission for counseling services is as follows:

To ensure that program participants, who utilize a budget to self-direct in-home services, are successful employers with the skills to hire and manage directly hired personal assistants and manage a budget to meet service needs and objectives.

Counseling services are performed statewide to individuals who are participants of the Arkansas IndependentChoice, and ARChoices programs. Support Coordinators are charged with the following printary tasks, while engaging person-centered planning:

- ✓ Providing information about self-direction hat enables individuals to determine if self-direction is 'ne right' service delivery model for them.
- ✓ Validating a program party ip ant's ability to direct their own care and accept the respons bilities as an employer (or properly delegate those responsibilities to a 'egally responsible adult who serves as representative for the individual).
- ✓ Providing assistance and training to SDSB program participants, including information regarding the individual's rights and responsibilities.
- ✓ Empowering the individual to set goals and develop a service and support plan that meets those needs and goals.
- ✓ בחכש יים יוחg the individual to recognize and report critical events, including fraud and abuse.
- lelping the individual assess their needs and developing a back-up plan; and,
- ✓ Evaluating the program participant's success with the program and remediating, when appropriate.

Palco's counseling support is designed to strengthen a Medicaid beneficiary's ability to meet individual goals and to fulfill the responsibilities of a domestic employer. Counseling services



Person-centered planning encourages individuals to exercise autonomy. choice, & control. over the services they need.

are conducted face-to-face in the home setting. Support Coordinators serve a caseload and reside in the same geographic area as the participants they serve. Additional support is provided by the Support Coordination team by offering telephonic support and technical assistance on issues that do not warrant a face-to-face counseling visit.

# Overview of Home Visits

There are five (5) types of allowable home visits under the SDSB counseling orogram. Home visits that do not fall into one of the five categories below are not billable to idedicaid:

Counseling Visit Types

Visit Type	Description
Initial New Employer	This visit oc ure a ring initial enrollment for
Orientation ("INEO")	individuals who have not previously self-
	directe\'
New Employer	This visit occurs for individuals who are
Orientation ("NEO")	c rrently self-directing but need to change
	empleyer authority.
Information &	This visit occurs during initial enrollment and is
Assistance for Uncertified Participants (IAII)	for individuals who have not previously self-
	directed. IAU visit occurs when certification is
	completed but the employer needs additional
	assistance prior to becoming active.
Frequency-Based	This visit is generally used for monitoring
Home Monitoring	purposes to ensure that the program participant
("FBHM")	is experiencing successful outcomes with SDSB.
	It may also be used to review program
	information upon a participant's restart on the
	program.
Issued-Based from e	This visit occurs when emergency situations
Monitoring ("lb" M")	arise or when negative employer outcomes are
	reported.
Information &	This visit occurs for those situations beyond the
Assi tar ce for Active	timeframe for orientation and post six-month
Particin ants ("IAA")	employer designation or quarterly monitoring
77	but is needed to help support the participant by
	providing information and assistance and may
	support a specific need for skills training.

After the third occurrence of NEO (New Employer Orientation) during a twelve-month timeframe, Palco must communicate in writing to DPSQA the reasons for the frequent

change in employer authority and recommendations on whether the SDSB enrollment should continue.

Face-to-face and telephonic counseling support services are provided Monday through Friday 8:00 a.m. through 4:30 p.m., unless the program participant has agreed to an alternate time, and this time has been approved by the Regional Manager. If extraneous characteristances arise and counseling cannot occur in the home setting, the Support Coordinate. must have written permission from DHS, with an endorsement by Palco, Inc., to provide face- to-face counseling support in another setting.

Home visits are billed in 15-minute increments. Any time spent in the home under 7 minutes is not billed. Any time exceeding 7 minutes is billed to Mecicaia. Our database will retain requisite information about each home visit, including the type of home visit, the information conveyed between program participant and Sur port Coordinator, and the outcome of the home visit. All claims submitted must have supporting documentation or they will not be billed.

Each Support Coordinator is equipped with a laptop or tablet with wireless Internet hotspots included in machine hardware. Support Coordinators can pull Google Maps or other tracking software on their laptops or tablets to wante participant homes easily without getting lost, particularly in rural areas. With this functionality, Support Coordinators will also be able to make calls or send message, to the falco home office from their machines.

Support Coordinators are paid for time spent in the home that is relevant to performing counseling-related tasks. Time spent in the home is calculated based on claim submissions through an electronic verification system (EVV). The EVV system captures start and end times, which are used to colculate Support Coordinator pay. The Support Coordinator documents the happenings within a visit through the CMP system using their company issued laptop. If the Support Coordinator cannot use the system due to technical difficulties or access to the internet, they can document using alternative means.

Support Coordinators use structured software-based questionnaires and checklists of learning objectives to assess an individual (prospective self-directing employer's) knowledge. Each home visit type covers a prescribed set of modules, which are explained in detail in Section 2.6. The modules will help Support Coordinators assess how well individuals understand their rights, risks, and responsibilities and how that understanding is used to

meet expectations with little assistance or interference from Supports Coordinators. This information is used to further develop a training curriculum tailored to a participant's unique set of needs.

# Training for Support Coordinators

Support Coordinators receive in-depth training upon hire. Training programs center on person-centered planning and communicating the philosophy of self-direction. Training materials will teach Support Coordinators how to give the participant the tools needed to discover their needs, develop a plan to meet those needs, and apply their crengths in executing the budgetary plan. SDSB program objectives, red flags, rigns of abuse or neglect, and ways to assess program participants' strengths in ability to self-direct are covered extensively. During training sessions, Palco evaluates the Support Coordinator's understanding of the requirements necessary to perform to a role of an employer and abide by programmatic specifications so that the Support Coc dirator can pass this information along to the program participant.

Managers conduct a biweekly meeting and training with the entire Support Coordination team. Training is reported on the monthly report provided to DHS by the 8th of each month. Support Coordinators who emerge from Falco's training program are expected to use structured lists of learning objectives to assess a program participant's knowledge of each session's learning objectives. All training materials are stored electronically on each Support Coordinator's work laptop and is available on the Support Coordinator's Sharepoint website.

# **Terminating**

When a member changes caregiver, they are required to fill out the Employment Separation Notice to terminate the worker who is no longer employed. The document requires the employer and separating attenda + to sign. If one of the two cannot be present, a witness can sign.

 $<sup>^{1}</sup>$  Supports Coordinators must have a minimum of three years of experience working with the general public with experience in teaching, mentoring, coaching, with outcome-based expectations and have excellent communication skills. All Supports Coordinators are required to pass a criminal background check, a test with the Arkansas Maltreatment Central Registry, and a drug screening. Individuals who do not pass these three checks will not be offered a position as counselor.

# **Enrollment**

# **Program Enrollment**

# General Enrollment

- ✓ Palco Customer Service Representative (CSR) receives phone call from a fultre AR IC. participant.
- CSR checks the Medicaid website for caller eligibility.
  - o If the caller is eligible, the CSR completes a pre-screen.
    - It is mandatory to obtain the caller's physical activess during the prescreen call.
  - o If the caller is already on the ARChoices waiver pagram per the Medicaid provider portal, then CSR refers the caller to their loca' coun y RN.
  - o If the caller is not eligible per Medicaid provider portal, CSR refers the caller back to their local county DHS office.
- ✓ Account Manager sends prescreen informa io: , > the Division of Provider Services & Quality Assurance (DPSQA).
- DPSOA
  - o If the caller does not qualify DrsQA informs Palco the caller does not qualify for the AR IC program via daily renorts.
  - o If the caller/part.ripan. does qualify, DPSQA uploads the caller/participant's referral into Optum's database.
    - The participant home to complete the initial assessment. At this point the PAR tier level is determined.
    - After assessment, the PAR will complete the Task and Hour Standards to determine the plan of care
    - These individuals are added to the pending referral report that is prepared by DPSQA.
- ne pending/referral/assessment report is uploaded to Moveit for download
- At this point participants are considered uncertified.

# Prescreening Applicants

Medicaid recipients have freedom of choice when selecting service delivery models. If the beneficiary chooses the Self-Directed Service Budget ("SDSB") service delivery model, and contacts Palco to enroll, Palco will pre-screen individuals for enrollment in the program.

Callers who intend to enroll will call Palco at the call center phone numbers. If the individual calls after hours or during high call volumes, they will be prompted to leave a voicemail. A Customer Support Representative ("CSR") will return their call within three (3) days of the voicemail.

# Flowchart for Pre-Screen Procedures



\*Anyone on PASSE should be referred to their care coordinator, information is on the provider portal for Palco to view.

Palco is responsible for determining "the individual is Medicaid-eligible and if they require assistance with "hands-on" ctivities of daily living. Thus, callers are asked sufficient questions to verify Medicaid eligibility and heir level of assistance required with performing ADLs (Activities of Daily Living).<sup>2</sup> During the pre-screen if Medicaid eligibility cannot be established, callers will be advised to contact their D.4S County Office ("DCO") to begin the application process. The overall procedure for present on is structured in Figure 2.

# Initial Procedure for Pre-Screening Applicants

Whe. ca''ers inquire about self-direction, Palco Customer Support Representatives ("CSR") will encourane individuals to apply for the program. If the individual is agreeable to applying, the CSR will inform the caller that they must have the Medicaid ID of the individual seeking enrollment before they can undergo the pre-screen process.

<sup>&</sup>lt;sup>2</sup> DPSQA is responsible for making the medical determination for services.

If the individual does not have a Medicaid ID, the CSR informs them that they must call back later once the ID is obtained. If the individual does have a Medicaid ID, the CSR informs the caller that they will begin a pre-screen and that the CSR must speak directly to the individual, to their Power of Attorney, or to someone else who is not intending to be the paid worker. If the caller agrees, the prescreen can begin.

The CSR first thanks the caller for inquiring about the SDSB program and secondly verifie, that they are speaking to the individual seeking enrollment, their Power of Attorney, or ano her individual who is not intending to be the paid caregiver.

If the CSR is satisfied that he or she is speaking to a qualifying indiviqual then the caller is informed that this process is only for pre-screening purposes to make a prelimi, any assessment of whether this program is a good fit for them, and that it does not guaran se an oument. The Medicaid ID number of the person seeking enrollment is collected, and the caller is placed on hold while the CSS searches our database.

If the individual is in The Case Manager Portal (CMP), the status of the individual is visible. If the individual is currently enrolled, the CSR notifies the individual that they are currently enrolled (or enrolled and on hold) and seeks to determine the transfer for the call. When appropriate, the caller is relayed to a CSR who can better answer the relayed to a note is flagged to the Supports Coordinator that the individual may have a change in circumstance.

If the individual is currently diser olled from the program, applicant demographic and contact information fields are pre-populated, and the specialist verifies the accuracy of this information. Once verified, the specialist moves on to verifying Medicaid eligibility.

If the individual is not in The Case Manager Portal (CMP), the specialist starts a "New Application" and collects demograph, information by following the pre-screen script. The information is recorded in a ropor; saved on SharePoint. The format listed in this report was requested by DPSQA and can be foun. here. Please note that at least one phone number must be provided. An applicant can opt to leave a secondary phone number or email address, but it is not mandatory. Additionally, the applicant must provide both a Social Security Number and Medicaid ID number along with their physical address.

# Verifying Medicaid Eligibility

The Medicaid eligibility of all individuals seeking enrollment must be validated through the patient eligibility and benefits inquiry section of the Arkansas Medicaid Web portal. At least one of the following sets of information is required to search for an individual's Medicaid eligibility:

Medicaid ID and date of birth

- ✓ Medicaid ID, first name and last name
- First name, last name, and date of birth

If the search does not return any results the Valid Request Indicator under the Request Valuation Section of the web portal page will display N (No) and the individual is referred to their DCO to ensure that they are enrolled in Medicaid properly. If the search determines that the inquisition is currently in a waiver, they are referred to their waiver nurse to change their plan of care.

If a search results in a Medicaid eligible individual who is not currently receiving vaiver services and whose aid category is eligible for SDSB services, the CSR will conduct a series of questions about ADL's (Activities of Daily Living) as approved by DPSQA.

# **ADL** Questions

Needing assistance in only one ADL is the minimum requirement to get assessed by the assessment contractor. When the customer service rep receives a "yes" to one of the following ADL guestions, the customer service agent will be able to complete the intake without asking any further ADL questions and move on to the Cognitive Questions.

All Cognitive questions need to be asked to date, more if a Representative is needed. If a representative is needed, then the representative information is needed so that the assessment contractor can make contact. It needs to be clarified that the Rep/POA/Legal Guardian/SSI Income Payee cannot be a caregiver.

- If the applicant does require assistance with ADL's, make sure to write YES in column V and their application will be inferred to DHS.
  - o CSR: "Based on the answers you have provided; we are going to forward your application to DnS. An Optum representative will contact you within 15 business days. If do not hear from someone in that time, please call us back for assistance." (Phone number from Optum can be provided at this time)
  - o If the beneficiary does not qualify based on the answers provided, customer service can re er the beneficiary to contact the local DHS office for other programs that may offer as sistance.

# Pre-Screen Follow-up

Prescreens completed the previous day will be uploaded to the AR Moveit site, when applicable, by the account manager. The following day, DPSQA will respond to uploaded Prescreen report and provide results whether the prescreen was accepted or rejected. The account manager will fill in the response from DPSQA in the report saved on SharePoint for reference, in case the applicant does call back.

# Referrals for enrollment

Program enrollment begins with receiving a referral from DPSQA. A referral is simply a notification of an individual who is seeking program enrollment and a request for further action by Palco.

Medicaid requires that Palco completes a referral in **60 days**.<sup>3</sup> Thus, 60 days after Palco receives a referral, the Support Coordinator must have taken one of the following tasks:

- ✓ Endorsed the participant's ability to self-direct by ensuring that the participant or their representative has the skills, knowledge, and abilities to direct their care and are ready to do so, as evidenced through documented orientation sessions and endoment by a Supports Coordinator; or
- Assess that the individual is unable to self-direct or does rothere individual who may serve as a representative to assume the duties of the employer role.

Some referrals will be the result of individuals Palco staff presence; some will not. Referrals that are the result of Palco pre-screening will result in both a referral to DPSQA and a migration of demographic information to Palpro. At this point the referral is considered complete, and the process proceeds as described in this section, with the Program Enrollment Timeline commencing on the date of the pre-screen that resulted in a referral to DPSQA.

Referrals for the SDSB service delivery model will originate from DPSQA, who coordinates referrals from the Division of Developmental Disakilities Services, Departmental of Behavioral Health, and other areas of DHS. Counseling support services will not be provided prior to receipt of the referral by DPSQA. DPSQA will send Pairo a Referral spreadsheet that contains the following information, which will be captured in Pairo:

- ✓ Name of the individual seeking SDSB program enrollment.
- ✓ The indiadval's Medicaid identification number.
- ✓ Add, ess of the individual.
- ✓ Lounty or residence
- ✓ lan of care budgetary funds.⁴ and,
- A summary of the individual's needs.

<sup>&</sup>lt;sup>3</sup> A 30-day extension may be granted with express written permission by DPSQA.

<sup>&</sup>lt;sup>4</sup> The monthly budget is based on the level of medical necessity as determined by the Task and Hours Standard performed by the DHS nurse.

Referral spreadsheets sent by DPSQA will be stored electronically in their original format. Referrals are physically inspected before the data is uploaded to the Case Manager Portal (CMP). Any individual forms sent by DPSQA with the referral spreadsheet are stored in individual case files.

When Referral data is uploaded to CMP, an error log is generated, displaying individuals who vere not uploaded and the reason for the error. Common errors will include the following:

- Medicaid ID number is not enough digits.
- ✓ The individual is already in our system; and,
- ✓ Formatting issues with the Referral information.

When the Referral information is not uploaded due to errors in be well dicaid ID number, Palco Account Managers take the necessary steps to obtain the correst Mouicaid ID number by contacting DPSQA.

For individuals who are already in our system, CSR staff should review the address on file and compare it to the address sent in the Referral spread-heat. Once reviewed, CSS staff can resubmit the Referral information by overriding errors of the import of referrals into CMP.

After referral data is imported into CMr, an event log is created in the individual's chart, displaying the date the referral was received and the individual who received and imported the referral.

CMP automatically assigns all new inferrals an "Uncertified" status. This status alerts users that the individual is not actively errolled on the SDSB program, but that they are in the process of receiving training to become enrolled. In addition, CMP assigns the individual a Palco ID number and a region.

To complete a efercal, home visits are required. However, before home visits can be done, Palco must first conduct some administrative tasks to lay the foundation for the home visits.

Participant prollment (certification)

- Talco Regional Managers (RMs) see this participant information in the CMP system and a Support Coordinator (SC) is assigned. Support Coordinators are assigned by geographical location.
- CS (Customer Support) calls and does the initial Palco overview with the participant within 3 days after receiving referral.

<sup>&</sup>lt;sup>5</sup> Palco staff can view the Events log to determine how many home visits have transpired and the individual's status on becoming certified as an employer on the SDSB program

- SC's schedule in home visits with the participant within 5 days after received referral.
- SC completes all modules with participant for certification.
  - o During the first visit, if required, the Authorized Representative is certified.
  - o Employee background check and PIN application paperwork is provided, and the SC suggests completing as soon as possible to not delay a start date.
- SCs log certification completion and name of backup worker into the CM?
- ✓ Enrollment department does outreach to begin intake process for completing EOR and Employee paperwork.
- ✓ Enrollment department and Support Coordination work toget for assist the participant and employee in completing intake paperwork and providing all ne essay attachments.
- ✓ Caregivers must complete a state required criminal backg: unc check (CBC) prior to becoming a paid caregiver. Once the state notifies Palco of the intended caregiver's cleared CBC, Enrollment logs the caregiver as active.
- Caregivers must apply for a PIN (Practitioner Identification Number) using PIN request form, Form DMS-7708. Form must be mailed or faxed to Gainwell Technologies.
- ✓ The next business day a start request is generated, includes
  - o Participant, representative (if topling bie), active caregiver, referral date and certification
- Enrollment will upload a staγ request report daily, when applicable, to the AR Moveit site.

# **Authorized Users**

- ✓ Depending on the assessment, a representative may be required based on the diagnosis.
  - o In some asks, a representative is optional.
  - Muct live within proximity of participant
  - Mirc. De 18 years or older and have participant's best interest in mind. Can be:
    - Participant's legal quardian, POA
    - Family member
    - Friend
  - Must comply with program criteria and responsibilities
  - o Multiple Authorized Users will be allowed, allows multiple family members to be able to call in for informational purposes

Summary of Enro	Ilment/Certification	Home	Visits
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Initial New Emp	loyer Orientation (INEO)	New Employer Orientation (NEO)	Information and Assistance (IA)
Definition	Support Coordinators assess the individual's ability to self- direct. Enrollment results if	Support Coordinators assess the Medicaid beneficiary's abilities to	IA is to provide information and assistance about SDSB.
	the Support Coordinator is satisfied with the individual's skill set.	self-direct. Endorsement and certification are required to complete the NEO.	OL
When to Perform	Only for individuals who have never self-directed.	When the particinant has changed employer authority.6	When the INEO or NEO is started, but the Supports Coordinator cannot certify the individual to self-
Recommended Session Times Maximum Daily	3 visits at 2 hours apiece	3 visits at 1.5 hours ਵੜਾਂece	None
Limits	5 hours per participant	4 hours per participant	5 hours per participant
Maximum Visits	Once the individual is endorsed, IN'2O connot be billed if the participant remains active. <sup>7</sup>	No more than 5 NEOs are allowed in a 15-month period.	None
Special Instructions	None	DHS approval must be granted after the 3rd NEC in a 12-month period.	None
Manda*oi v Modales	1-12 (13 is required only if a ridocumentation is necessary).	isk mitigation	None. IA (Information and Assistance) is a "backup" code for INEO (Initial New Employer Orientation) or NEO that does not result in enrollment.

<sup>&</sup>lt;sup>6</sup> This includes a change in service delivery model, or if the participant is assigned a representative, who will become the employer of record.

 $<sup>^{7}</sup>$  This is true, no matter how many times he or she changes employer authority (i.e., disenrolls and re-enrolls).

Our training materials suggest a total of three (3) INEO home visits to certify an individual. However, fewer may be required, depending on the individual's skill set. However, due to the nature of INEO visits in covering so much ground, these enrollment visits have many opportunities to exceed three (3) total visits. Therefore, it will not be uncommon to see INEO visits that span longer than three (3) visits.

On the other hand, since many participants may have previously self-directed, the NEO visits may take less time to complete than INEO visits. Even so, participants should be trained in a personcentered manner with each employer receiving individualized training, ever if tha means exceeding benchmarked visits on occasion. The recommended rubric is three (3) total NFO visits, but it will not be uncommon to see NEO visits totaling less than three (3) visits.

Each certification visit should only last if the participant appears interested and able to actively participate and learn. The attention span of participants will valv. This, it is suggested that the Support Coordinator make several home visits before they an certify the individual in the SDSB model, as explained below.

# Module Summary for INEO/NEO/IA

Required	Modules	When Should the Visit Octur
Visit One	1 – 5	Arranged within 10 days of receipt of referral
Visit Two	6 – 8	3-5 busings cays after Visit One is recommended
<b>Visit Thre</b>	e 9 – 12	3-5 burine days after Visit Two is recommended

In all cases, each visit requires either a Jocumented endorsement by the Support Coordinator that employer and programmatic res, onsibilities are fulfilled or address areas where additional skills training may help to improve employer's ability to meet responsibilities.

Once an individual is certified as having completed INEO or NEO, then the individual has a status of "Certified" in C'AP. As an additional quality assurance measure, Palco Counseling Support Specialist staff updates the case status to "Active" on the date the individual has chosen to begin selfdirecting. Palco 's required to provide advance notice of seven (7) days to DPSQA prior to establishing a date that self-direction can begin.

# Worker Enrollment

Coordinating Background Checks & Drug Screens

Arkansas Code Annotated (A.C.A.) §20-77-128, AR Code § 20-38-103 and DHS policy 1082 requires all employees providing services to the elderly, individuals with mental illness or developmental

disability or children to submit to a criminal history and a central registry check. Applicants or employees found to have been convicted of a crime listed in A.C.A. §20-77-128 or DHS policy 1082 shall be prohibited from providing services. Should an applicant or employee be found to have been named as an offender or perpetrator in a true, substantiated, or founded report from the Ch. d Maltreatment Central Registry, or the Adult Abuse Central Registry, the applicant/employee small be immediately disqualified.

# Criminal Background Checks

Palco will work with the Department of Human Services' Division of Provide Services & Quality Assurance (DPSQA) in coordinating a process for background checks for self-directed caregivers employed by Medicaid participants and paid, in part or in whole, with Medicaid funds. Palco will obtain a signed consent form from the applicant or existing self- in econd laregiver authorizing review of Medicaid and Medicare Excluded Provider Lists as per Souer I regulations. Palco will also provide consent forms to existing self-directed caregivers for the completion of all background checks including the Adulty Maltreatment Registry check, the Chi d Maltreatment Central Registry check, and the criminal background check (in accordance with A.C.A 20-77-128). List of offenses that are unqualifying can be found here. DPSQA will forward the background check document(s), pertaining to applicants or existing self-directed care rivers, to the Arkansas Adult Maltreatment Registry, the Child Maltreatment Central Registry, and the Arkansas State Police.

- ✓ Palco shall assist DPSQA with distributing all required background check consent forms to applicants and existing self-directer, caregivers. The consent forms for the Adult Maltreatment Registry check, Child Maltrezimera Central Registry Check, and State criminal background checks constitute all required background check consent forms. Palco will send all required background check consent to the Regional Managers.
  - o Prior to becoming eligible to be a self-directed caregiver paid in part or in whole by Medicaid funds, the Adult Maltreatment Registry check and the Child Maltreatment Central registry check must result in a "no findings" determination and the state criminal background check must result in a "not disqualified" determination.
  - Filer will receive a weekly report from DPSQA indicating that an existing self-directed caregiver or an applicant has been "cleared" or "not cleared." This decision will not be made until the results of all required background checks have been processed.
  - The applicant or existing self-directed caregiver will remain as "pending or not eligible" in the Palco system until all required background checks are completed.
  - The applicant or existing self-directed caregiver will not be eligible to receive payment from Medicaid funds for providing services to a Medicaid participant if they are "not cleared" by all required background checks.
  - o All required background checks will be performed on existing workers at the annual reassessment of the participant (employer).



- ✓ Perform both an OIG (Office of Inspector General) and an OMIG (Office of Medicaid Inspector General) Excluded Provider list check on all existing self-directing caregivers. An agreed upon number of existing self-directed caregivers will be checked each month until all Excluded Provider lists have been checked on all existing self-directed caregivers. Any new app icant (worker) should also clear the Excluded Provider list prior to employment.
- ✓ Work with DHS/DPSQA to establish a cycle to renew all background checks at least once every. five (5) years.
- ✓ Maintain a record of applicants or previous self-directed caregivers who did not clear all required background checks.
- ✓ Not make payment to any individual who receives a "not cleared" determination by DPSQA on any of the required background checks:
  - o Criminal Background Checks
  - Arkansas Adult Maltreatment Central Registry,
  - o Child Maltreatment Central Registry, OR
- Appears on the Medicaid or Medicare Excluded Provider List.
- ✓ Establish a methodology for the background checks with the existing self-directed caregivers or applicant. The methodology for each hac, ground check is described below (see pg. 3).
- ✓ Receive a weekly list from DHS/DPSQ, communicating any existing self- directed caregivers. or applicants who have receive a "-leared" or "not cleared" determination. Palco will use the information from this file to update CMP with the results. Once the existing self-directed caregiver or applicant has the red all background checks, new self-directed caregivers will be made Active in CMP. Fusting rest-directed caregivers will remain active if they clear all background checks.
  - o If an active can giver received a "not cleared" determination, the caregiver will have a 60-day give period, after "not cleared" date to submit claims. The Supports Coc. Inator will schedule a visit to discuss the participant's options. A new caregiver c in he hired, or the participant can opt for agency services if they need time to find a ev. applicant.

# Arka, sar Adult Maltreatment Central Registry Checks

The Adu't Maltreatment Central Registry is maintained by the Arkansas Department of Human Services and includes all individuals against whom a true finding of abuse or neglect has been made. A true finding does not mean that abuse or neglect appears on an employee's criminal record. DPSQA performs Arkansas Adult Maltreatment Central Registry check on each applicant.

# Arkansas Child Maltreatment Central Registry Checks

(CFCO will result in an expansion of the participant population that includes individuals less than 18 years of age. Arkansas Child Maltreatment Central Registry checks are required for workers providing services to those individuals.)

The Child Maltreatment Central Registry is maintained by the Arkansas Department of Yuman Services and includes all individuals against whom a true finding of abuse or neglect as Deen made. A true finding does not mean that abuse or neglect appears on an employee's crit, inal record. DPSQA performs Arkansas Child Maltreatment Central Registry check on each applicant.

# Medicaid and Medicare Excluded Provider List

Individuals who appear on the Medicaid and Medicare Excluded P. Svicar List are prohibited from providing services paid for in whole or in part by Medicaid. The Mountaid Excluded Provider list is available for download on the Office of Inspector general website in e:

https://oig.hhs.gov/exclusions/exclusions list.asp. The Resu.'s of .he Excluded Provider List check are stored in the associated participant's electronic file.





# **Budgets**

# **Budgets and Allocations**

Each individual Participant/Authorized Represe, ta. e has budget authority which allows them to choose now they want to use the money and hours which have be in allocated to support their care needs based on their assessment. Palco assists with this process by helping the Participant/Authorized Representative develop a plan in how to utilize and manage the allocated funds.

# **Cash Expenditure Plan**

Palco is responsible for providing an electronic b.workly cash Expenditure Plan (CEP) budget template, representative of the assessment, to the GDSB Counseling entity for completion in the home setting. The CEP template provided to the improved to the improved tax rate, a space for hourly calculations and norra ive input by the SDSB Supports Coordinator. The narrative space allows for entry to describe now purchased items will meet a goal on the employer's plan of care to lessen human dependency needs or sustain current functional ability.

The template includes the funds available to the participant by day, which is referred to as the daily rate. The daily rate is calculated by multiplying the assessment hours by \$13.14 and dividing the result by 30.5. For each b. veekiy CEP, the total funds available are calculated by multiplying the daily rate by 14. An example of the CEP Template can be seen on the next page. The fillable PDF version is found in the SC Sh; rePoint Library.

Once the DSB . upport Coordinator and employer develops the CEP, during a face-to-face visit, it is automatically recorded in CMP as a pending CEP. The CEP is reviewed for accuracy before being transi. i'led electronically to DPSQA for approval. A finalized copy of the CEP is provided to the employed through email or mail based on the preference of the employer. Palco processes payments for goods and services authorized by the CEP. Payments for goods or services that exceed an employer's CEP cannot be processed.

AR Choices budget status and updates must come from the county nurse (change in the plan of care). DPSQA uses the authorized CEP as a guide to begin the flow of program funds for the participant's payroll and other budget expenses from Medicaid.

Example Cash Expenditure Plan



PO Box 242930 Little Rock, AR 72223 Toll Free 866,710,0456 Online: PalcoFirst.com

# Arkansas Cash Expenditure Plan (CEP)

As the fiscal agent, Palco can only process and pay for shifts/claims that are within the participant's budget and rash expenditure plan (CEP) as approved by the Department of Human Services. Employers should manage and direct the care accordingly, only scheduling their workers for the hours that can be afforded by the budget. Any till resheets that exceed the allocated funds will be rejected for correction by the employer before Palco can process and pay.

Participant Name:		Palco ID:
Medicaid ID:	Employer Tax Rate: 11.35%	Budget Eff Live Later
Total Budget for all Service	es (biweeldy total):	

Budget	tor Person	nai Attend			4 DAY a eriod	
	Er Ho	nployee urly Rate	Î	Rate F. 's Tax	Hours	Cost of Hours
Personal Care Service:	\$	10	4	11:35	20	\$ 0.00
Attendant Care Service:	\$	11	<b>\$</b>	.2\485	30	\$ 367.46
					Total	\$ 367.46

Bud et for Ther Personal Care Expenses		
Savings:	\$	
Recurring Expenses:	\$	
Total Budgeted Other Pers, nal Care Expenses:	\$	

Notice: Receipts required ; w th. re items. You will not be reimbursed for receipts in excess of the amounts listed below. Failure to provide receipts will prevent you from receiving funds for these expenses. Only funds designated for Savings will accrue. Funds designated : goods or ::rvices do NOT accrue and must be claimed via receipt for each service period.

DISCLAIMER: A. a., employer, you are required to pay employment taxes at rates established by the IRS and the State of Arkanse . A. Park Pipants are required to pay employment taxes, the amount of which will vary from person to person. Some if your 1 tal dudget goes to pay these employment taxes. Therefore, the Total Budget for All Services and the Cost Pr Pa, Period o NOT represent the total amountto be paid to your employee. As the fiscal agent, Palco manages your emplryme... axes, including making sure the appropriate amount is paid to the government. Any balance remaining due to " ratechanges is returned to Medicaid.

OVERTIME AND MINIMUM WAGE RULES: Beginning January 1, 2016, your employee must receive at least minimum wage, and any of your employees who work over 40 hours in one week of a service period must be paid overtime wages. Arkansas minimum wage is \$11.00 in 2021. Participants in full use of their budgets may not have the funds to pay these additional overtime wages through their Cash Expenditure Plan. This overtime rule does NOT apply to your employees who live in the home in which they work as long as the proper paperwork is completed with Palco, Your caregiver employee is considered a live-in worker if they reside in the home at least five days per week.

This form does not change or set an employees rate of pay. You must submit a signed Rate of Pay form.

# Allowable Services

Participants have the option to use their funds to purchase other goods and services, which allow them to decrease their need for human assistance and increase their independence.

Typically, these items are set up on a recurring basis and must be used in the period for which they are allocated.

Some examples of other goods and services that can be purchased include medically, ala.ed transportation not provided through the Non-Emergency Transportation (NET) Waiver; over-thecounter or prescription medications not covered by insurance, Medicaid, or Medicare Part D: purchase or rental of adaptive equipment; communication devices; home modifications; emergency food, clothing, pest control, housing, or utilities; safety devices; technology; environmental equipment; education; and, service animal purchase and maintenance. Palcy will pay the vendor of these items directly given a vendor packet is completed by the complete.

The participant may also use discretionary cash to purchase personal hygiene items. These items must be paid out of pocket first. Receipts are then submitted to 1 alco, who will reimburse qualifying items. Other items may be approved at the approval of DHS. Paico will obtain approval from DHS on the participant's behalf.

The participant has the option to set aside son a o their funds to save up for a more expensive good or service. Such items are listed in the programmal. Palco Support Coordinators assist the participants in setting up their budget 'o ellow savings for these items and will coordinate the approval of these purchases with DHS or, the participant's behalf.

# Disallowed Services

Goods and services of any 'rind are not available (not covered and not reimbursable) under IndependentChoices, in Juding using the cash allowance, when and to the extent any of the following may apply:

- 1. When available to the participant from another source, including without limitation family members, a member of the participant's household, or other unpaid caregivers; a Medicaid State Plan covered service; the Medicare program (Medicare Part A, Part B, or Part D); the parti ipant 3 Medicare Advantage plan (including targeted or other supplemental benefits rifered by the plan); the participant's Medicare prescription drug plan; and private medical, lug-term care, disability, or supplemental insurance coverage. This includes reasonably comparable or substitute goods and services.
- 2. When not for the sole benefit of the participant or the maintenance of the participant's service animal.
- 3. When provided contrary to any Arkansas scope of practice laws and regulations pertaining to nurses, physicians, skilled therapists, pharmacists, or other licensed professionals.

- 4. When goods and services of any kind are acquired or received for re-sale, or otherwise re-sold or gifted, whether for cash, barter or in-kind trade, or other compensation or consideration, and regardless of who may benefit; and
- 5. When goods and services of any kind are acquired or received to substitute, or otherwise replace, other goods or services sold, traded, or gifted or intended to be sold, traded, or nifted.

In addition, the following types of goods and services are not available (not covered and not reimbursable) under IndependentChoices, including through the use of the cach allowance:

- 1. Alcoholic beverages of any kind, including distilled spirits, wine, mal<sup>1</sup> beve<sub>1</sub> ages, and alcoholic soft drinks:
- 2. Tobacco products of any kind;
- 3. Medical marijuana;
- 4. Any controlled substance listed under 21 CFR Part 1308, ir 7.19 controlled substance analogue as defined under 21 USC § 802(32)(A).
- 5. Prescription drugs, non-prescription (over the counter) drugs, vitamins, minerals, or other dietary supplements;
- 6. Illegal goods and services of any kind;
- 7. Medical, skilled nursing, pharmacy, skilled 'ncrap, services, medical social services, or medical technician services of any kind, including we nout limitation aseptic or sterile procedures; application of dressings; medication and assessment of health conditions; insertion, removel, or irrigation of catheters; tube or other enteral feedings; tracheostomy care; oxygen administration; ventilator care; drawing blood; and care and maintenance of any medical equipment;
- 8. Services within the scores or practice of licensed cosmetologists, manicurists, electrologists, or aestheticians, except to necessary assistance with personal hygiene and basic grooming.
- 9. Services provided for spods used by any person other than the participant, including without limitation a previour, family member, household resident, or neighbor.
- 10. Companion, socializacion, entertainment, or recreational services or activities of any kind, including, wi hout limitation game playing, television watching, arts and crafts, hobbies, and other activities pursued for pleasure, relaxation, or fellowship;
- 11. Cleaning of any spaces of a home or place of residence (including without limitation kitchen, path for , living room, dining room, family room, and utility or storage rooms, and the floors, farnishings, and appliances therein) shared by the participant with one or more adults who are, together or separately, physically able to perform housekeeping of these areas; and
- 12. Habilitation services, including without limitation assistance in acquiring, retaining, or improving self-help, socialization, and/or adaptive skills.

# Adjustments to Budgets

Hours available to an employer and employee in CMP must reflect changes in enrollment status, hospital and rehab visits, overpayments, and holds that may be placed an account. After making an adjustment, CMP calculates the available hours remaining for the pay period that the adjustment effects. The most common types of adjustment are:

- Hospital Stay: Caregivers cannot claim hours during a participant's hespital stay. The date of admission and date of discharge can only be paid if the caregiver provides proof the services were performed before the time of a lmission or after the time of discharge when the timesheet is submitted.
- Rehabilitation and Nursing Facility Stay: Caregivers cannot be paid for hours on any day that the employer was in one of these facilities, even it the hours were worked before or after the admission/discharge times.
- Disenrollment: If the date of a participant's diagn. "Iment from the program is effective on a day other than the first day of a b weekly payroll period, the days in the pay period after the disenrollment date must be adjusted.
- Reenrollment: If the restart date is any date other than the first day of a payroll period, the days before the start as a noust be adjusted. If the restart date falls within the same period as the disconrollment date and an adjustment was made for the disenrollment, the pre vous djustment must be deleted and a new adjustment must be made to reflect the days the participant is enrolled on the program.

Adjustments are made in CMP using the day offset process. Day offsets are created by selecting Adjust, next to Total Hours or the FAD tab. To adjust the days available, a start day of the adjustment must be entered aloug with the number of days to remove. Day offsets must be entered as a negative number. In SDS? all service hour types must be adjusted for each adjustment type. If program rules require ani, some services to be adjusted, they must be selected from the Service drop down box. Day offscts are not recorded until the submit button is clicked. All day offsets, regardless of the puriod, appear under Hour Offset History in the Offset Days window. The delete button to the let of each offset removed the offset.

# Financial Management Services

FMS - F/EA model - ro	les & responsibilities			
Enrollment and	1. Set up a unique EIN for all beneficiaries			
Tax filing/reporting	2. Track enrollment process			
preparation	3. Address missing/incomplete information, when needed			
	4. Issue W-2, as applicable			
	5. Ensure program and tax forms and documentation are submitted			
	6. Receive and retain demographic, budg at a id funding			
	information			
Payroll preparation	1. Process workers' information/packets so that payroll services can			
and services	start.			
	2. Receive and quality-check incoming timesheets.			
	3. Pay wages to workers and make reimbursements, as required;			
	and			
	Process batch payment. 2.14 oversee electronic funds transfer (EFT).			
Funds management				
Taxes	Issue FICA refunds (as applicable) and track and incorporate annual			
	changes to red rol and state tax tables.			
Reports	1. FMS Monthly Report			
	a. Total funds received from Medicaid			
	Inaccurate Funding, RA Variance			
	c. Expenditures-Service periods paid			
	d. Other goods and services			
	i. Recipient name ii. Amount paid			
	iii. Description			
	iv. Date			
	e. Refunds			
	i. 12-month deadline			
	ii. Disenrolled/hospital			
	f. Underutilization			
	2. Start Request report			
	a. Sent daily, requests start date for participants who've			
	completed certification.			
	3. Demographic Changes reported daily via email			
	4. Counseling Monthly report			

	a. Success Stories
	b. Personnel Updates
	c. SDSB Support Services, types and number of visits conducted
	d. Description of Training
	e. Reports made to APS; OMIG reports/referral and made
	by DAAS. We provide information for possible fraud
	and DAAS determines if it's fraud
	f. Complaint reports
	i. Date of complaint
	ii. Description
	5. Resolution
Communication	Communicate and resolve issues, i.e. 'er'in ation, budgeting, and eligibility questions.

# Taxes

Employers are required to pay both "employer" taxes, which are taxes specifically attributable to the employers, and for remitting tax withholdings 1. on, their employees. The following chart further explains this process.

Employer Payroll Taxes	Employer
FICA (Social Security + Medicare)	7.65%
Federal Unemployment Tax (, UTA)	6.0%
State Unemployment Tax (SUTA)	0.4% - 14.3%

# Exemptions

The IRS (Internal revenue Service) and Arkansas Department of Workforce Services provide relief for employers who, a family members provide domestic services in the employer's private home by specifically exe. apting some employees from paying FICA (Social Security and Medicare), FUTA or SUTA. See the following chart for a list of instances that result in employer FICA, FUTA or SUTA not being co'rected:

# IRS Paid Family Member Tax Exemptions

Relationship to EIN Holder	FICA	FUTA	SUTA
Child employed by Parent	Exempt (18 – 21 years of age)	Exempt (18 – 21 years of age)	Exempt (18 – 21 years of age)
Parent employed by Adult Child	Exempt	Exempt	Not Exempt
Spouse employed by Spouse	Exempt	Exempt	Exempt
Adoptive and/or Stepparent employed by Adult Child	Exempt	Exempt	No: Exempt

# **Payroll**

# Payroll

Payroll Deadlines	De.
Timesheet deadline	12pm on Thursday following last day of pay period
Palco processing deadling	Cvery other Tuesday
Payday	Biweekly on Wednesdays

- ✓ Direct Deposit is ່າe only form of payment on this program
- Overtime is not allotted within the budget set by the state.

Payroll is generated through CMP by calculating the total number of hours and the worker's hourly rate. The total number of hours allowed is set through an embedded formula in CMP that determines gross p. v and employer taxes and compares this to the hours of each service type on CEP. The number of hours paid to all employees of a single employer for each pay period is limited by biweekly CEP hours.

The hourly rate paid by the participant is set by the employer and their Supports Coordinator. Workers are paid in compliance with federal and state Department of Labor wage and hour rules for regular and overtime pay.

# Minimum Wage:

\$11.00 starting January 1, 2021

All in-home providers must receive, at the very least, minimum wage for their services.

## Garnishments

A garnishment is a court order directing that money or property of a t'uro party (usually wages paid by an employer) be seized to satisfy a debt owed by a debt or to a plaintiff creditor. Common examples of debt that result in garnishments include:

- Child Support
- Defaulted student loans
- ✓ Taxes (levy, lien)
- Court ordered creditor garnishment (lien)

Palco, Inc. manages all garnishments, levie: at a liens through CMP. Garnishments, levies, and liens, are stored with appropriate withouting information in CMP so that deductions are automatically calculated each time ray on is generated. All garnishments are remitted to the appropriate payee within the guideness requested by them. All documentation regarding garnishments, levies and liens on workers' payroll checks are kept in the individuals' files.

When processing payroli, there may not be enough money in the employee's net pay to satisfy all of the garniamize. In those cases, the maximum amount allowable by law is garnished from the endowyee's pay.

When multiple carnishments exist for a single employee, the garnishments are taken from the employee'. pay in the following order of precedence:

- ✓ Lhii、sur port order
- ankruptcy order
- Federal or state tax levies and student loan repayments
- Court ordered creditor garnishments

Garnishments must be paid to the garnisher within one business day of the payroll processing. Garnishments that have not been paid are viewed by running the Garnishments report in CMP. The report includes the following:

- ✓ Employee ID
- Employee Full Name
- Case Number of the Withholding Order
- Vendor/Garnisher Name
- ✓ Vendor/Garnisher Zip Code
- ✓ Starting Amount
- Amount Owed
- Current Balance
- Has Timesheet

A payment to the appropriate vendor listed is the condor/Garnisher name field must be made for each item in the Amount Owed כיוניוור. Payments to garnishers are made by paper checks. CMP will correctly calculate the appoint to withhold and make the deductions until the garnishment expires or is terminated.

#### Overtime

The U.S. Department of Labor has ruled to extend the Fair Labor Standards Act's minimum wage and overtime protections to most of the nation's workers who provide essential home care assistance to eldery parple and people with illnesses, injuries, or disabilities. Beginning January 1, 2015, home healthcare providers on the SDSB program will be entitled to receive overtime pay8 ann iss the caregiver meets the exemption requirements established by the Department on 'abor and the employer and caregiver have notified Palco of the exemption status.

# Reimb resements

Purchases authorized by the CEP of less than \$50 can be reimbursed to the participant based on receipts provided by the employer. Receipts are stored in the participant's electronic file. Single purchases above \$50 must be authorized by a designee from DHS. Supporting documentation required for these purchases includes:

<sup>8</sup> Employees covered by the Fair Labor Standards Act (FLSA) must receive overtime pay for hours worked in excess of 40 in a workweek of at least one and one-half times their regular rate of pay.

- The name and address of the service provider.
- A description of the purchase.
- Scanned documents from DPSQA supporting authorization from DHS.
- ✓ A receipt, invoice, or purchase order and total payment amount.
- The Medicaid ICN linked to the prior authorization.

Palco reviews receipts and other documentation to ensure that they are consister a with the CEP. Payments are made to participants according to the biweekly payroll schedule.

Palco maintains all supporting documentation relative to the parme . in the participant's electronic file. Payments are made to participants only if all supporting a cuments and authorizations have been received. Payments are made to Participants by EFT.

# **Electronic Visit Verification (EVV)**

The 21st Century Cures Act was signed into law on December 13, 2016, requiring Electronic Visit Verification (EVV) for all in home services Lindau Medicaid. Services that fall under the EVV requirements include all Medicaid funded personal care services and home health care services that require an in-home visit by a provider, siner under a state plan or waiver. This would include home and community-based services (FCBS).

According to the Act - EVV should se minimally burdensome and comply with the Health Insurance Portability and Accountability Ac+ of 1996 (HIPAA (Health Insurance Portability Accountability Act)) privacy and security laws.

The EVV system must include the following key data elements:

- 1. The type of service performed.
- 2. The individual receiving service.
- 3. The gate of the service.
- 4 The location of the service.
- 5. The individual providing the service.
- 6. The time the service begins and ends.

Arkansas requires dual verification for all EVV software. Palco has partnered with First Data in providing AuthentiCare 2.0 EVV mobile solution which captures two means of verification through:

Mobile Application Capture. The mobile application is a free smart phone app developed by the EVV vendor that captures the date, time and location of the attendant when clocking in and out by using the smart device's GPS. It uses a WiFi connection or minimal cell data to

send information. As an example, the attendant arrives at the home or starts the visit in the community (shopping, medical, etc.) and before starting services, opens the EVV vendor's mobile app to clock in. Some programs may require activities that were completed to be checked off or an attestation and signature by the participant. After clock out, the days is uploaded to the network and sent to Palco where it is inserted into Connect.

▼ Telephone Capture. Telephony or Interactive Voice Recognition (IVR) is a mathad of EVV used via the participant's landline phone. The attendant uses the landline phone to call in at the beginning of the shift and call out at the end. Calls are to a toll-free number and voice prompts guide the entire process. At the end of the shift, the number is dicled again and prompts are followed to clock out. Just like the mobile app, some programs may require activities codes and attestations which can be done using the fouchtone phone.

# An exception is a visit that lacks the 6 key EVV informational points

If the caregiver employee has a service interruption or loses their signal due to a rural area, the mobile application will still capture the six points of data and hold them within the application until the device reconnects to a signal. It is important that those commonly facing signal loss monitor that their time is uploaded into the Palco system by the end of the pay period for timely approval.

CMS also defines how many exceptions an individual can have. Exceptions are shift types that are required to be within EVV, but are performed outside of the system. Some examples include when individuals fail to clock in or out and reed to make an adjustment to their EVV time. Doing so flags the item as not having all the required CVV information on it. CMS provides guidance to states on how many exceptions a participa. tir allowed. Going over that limit may prevent payment to the individual.

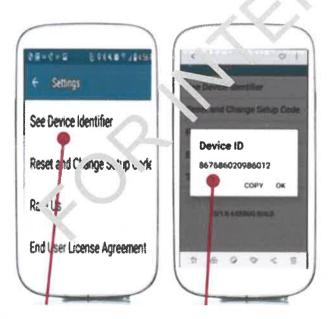
## **EVV REGISTRATION**

During the enrollment p. ocess, the worker and employer will complete an "EVV Registration Form" where they indicate their choice of EVV method and provide the required details for Palco to register them. The enrollment team will process the information and enter it in to the Palco system.

On the form, they will indicate if they are going to use the EVV Mobile Application or the EVV IVR/Te eph no option. Based on their choice, they will need to provide either a device ID for their smar device or the participants land line home phone number.

We require a unique email address for every worker, participant, and employer on the program. No exceptions.

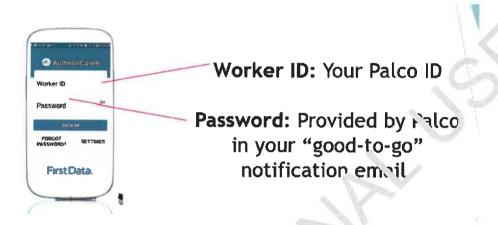
- 1. When using IVR, the phone number must be a landline. This is to protect Palco from ambiguous rules related to the location requirement of the Cures Act.
  - o The burden is on the employer to pay back unauthorized claims if they do not update their phone number with us. (FD does not know whether a phone number is a landline or not.)
  - o If there is a phone number associated with multiple participants, when two worker calls into the IVR for check-in, the IVR will give the worker the option to choose the participant for whom they are providing services during that time
- 2. Device ID is a required piece to authenticate users. Users (workers) have to obtain their own device ID and then send it to Palco, who then sends it back to the EVV system to verify the user
  - o We only allow one device to be registered at a time per , erson. To change it, the person has to complete the form again and send i in
  - A worker may use their device for multiple participants
  - o Technically, one device ID can be associated vith multiple workers. Each worker would need to be certain to login with their own app login information before checking in and out. Each worker can only have one dev. -e ID tied to their profile. However, Palco does not support this due to the complex vices with requiring workers to log in and out of the app. Therefore, if a participant wents a worker to use an in-home device instead of the worker's own device that has sheep been registered with Palco, this will not be allowed.



Information is processed via Intake when the enrollment is being processed, or directly into CMP for updates. Palco will upload data to the EVV vendor each night and the worker and employer will

automatically become registered within the EVV system. Urgent requests can be addressed by the Account Manager who can make updates directly in the Authenticare EVV system when necessary.

Credentials for logging in will be issued with the good-to-go notification that is sent out or by the Account Manager. Palco will not use IDs assigned by the EVV system or state. Instead, IDs needed to login to the EVV system are the Palco-assigned Palco ID. We provide this to the EVV vondor upon registration of the individual. IDs are unique by program, at very least. Where Palco serve, multiple programs within a state, IDs are unique to the state.



# **EVV Time Entry**

For Medicaid programs, EVV is the primary method of entry. If someone partially uses EVV, they cannot submit the rest of their time on paper. They must commit to 100% electronic time submission.

Palco primarily partners with FiServ/First Data to use their Authenticare application for EVV. This is tied directly into a nnect for a seamless solution for users to be automatically registered by Palco, as well as have their duta all within the Palco solution instead of managing two systems. This section covers our solution with FiServ; however, Palco's system is set up to accommodate other EVV solutions in the luture.

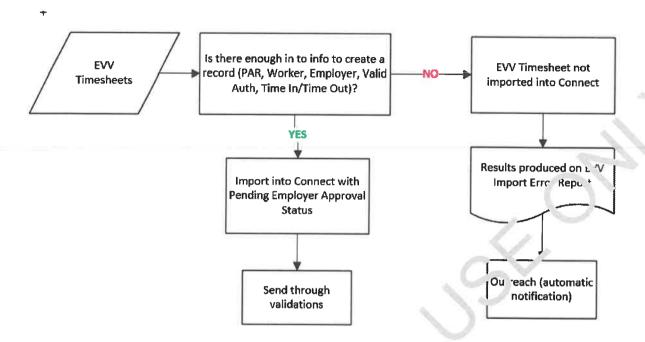
# Palco CMP Web API First Data Authenticare Beneficiary Information Enrollment **Authenticare Auto** Service Authorizations **Enrollment** Worker Information **Employer** Approval Cantus Work of neck-Ins/Check-Outs Geolocations Program Service Check-Ins/Check-Outs Plan Validations Geolocation Geolocations **Validations** Billing & Payroll

# Palco/First Data AuthentiCare Web Service Integration

When using the Authenticare application, data is oulled via automated process (via "job queue") to Connect twice daily just after noon midright. It comes over in Open status.

If the visit is the the newest shift in the properties, period, a new Timesheet (Timesheet Header Record) is created; otherwise, the existing pry period's Timesheet (Timesheet Header Record) is appended. In the following scenarios with EV7, the virit data cannot be imported into Connect. Instead, the timesheet data is populated on a report, and the user is sent an automatic notification.

- The participant, empiover, or worker does not exist in our system.
- ✓ There is no act, 'e employer for the date of the claim/timesheet.
- ✓ No author: tion exists that matches the service code of the timesheet.

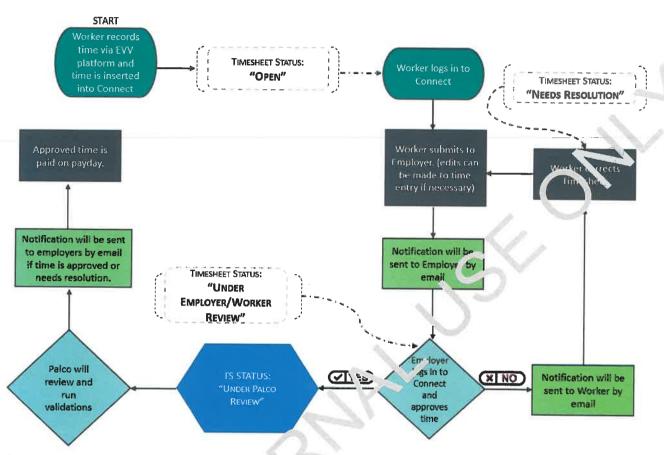


While the time is in open status in Connect, the worker may make edits to the time. Edits should be rare and not done often. The more edits a timeshies, has the more likely it will be flagged as out of compliance. Employers should remember that LVV 's a federal mandate and manipulating the data can distort the integrity. It is best practice with v the guidelines of clocking in and out every time via EVV and not having edits. In EVV, workers are considered the creators of the timesheet.

At the end of the pay period, a jc > ar.comutically closes the timesheet, and both the worker and employer must approve it.

- All employer approvals are done within Connect. Some EVV systems, such as FDGS' AuthentiCare, allow en ployer approval within their app, but it's not part of the standard Palco implementation
- ✓ When using EVV, mployers should not approve time via Connect daily and instead should vait until end of pay period to approve. This is to reduce the number of timesheet head records and notifications going out.

Rejections by the parties close off the timesheet, and it loses all EVV data. To be paid, it must reentered in Connect, and it is entered as an exception.



If an item does not pass all validations, it will be rejected. The individual will need to add a new timesheet to correct it; doing so vill hag it as an exception. Once a timesheet is paid, no adjustments to time can be nade.

For states that pre-bill, aggregator approval has to fit within the timeframe - or else we are going to change the payroll sci. adule. As part of the base implementation, Palco does not round in the EVV system. Any rounding is cone in Connect.

EVV data is store in an EVV table and is tied by key to the Timesheet table.

# **Connect Time Entry**

Connect is Palco's external time entry system. Users can enter their timesheets online via this portal. EVV visits are also visible in CMP. Connect is also linked to Palco's EVV vendor via an automated job system that allows visits to populate in Connect. Connect is only available to participant/employers and workers. It is not available to anyone else, such as case managers, state/MCO staff, or Palco staff. However, users with access to CMP can view externally entered Timesheet data from the CMP.

# Registering for Connect

After going through the enrollment process, employers and employees will receive a Good-to-Go email detailing their information. (Palco ID, start date, EVV Login, Connect Registration link) To register, they must click the link in the email and follow the instructions to login to the Connect Portal.

If they do not receive the email OR do not open the registration link before the expiration period of 30 days is up, they will need to fill out a Connect Registration Form. This form can be found on the Palco website under each program.

# Issues logging in

In some cases, an Account Manager can generate a Connect Account by using the information in CMP for both employers and employees. Cases should be created with the information in CRM. The Account Manager should then create the account and send the 'ag... information to the recipient with an email.

Passwords sometimes will need to be reset. Most of the time, the user can do this on their own by clicking the "Forgot Password?" link on the Connect again screen. If the problem persists, there could be other issues.

Common issues include duplicate email ac dresses being used, incorrect email address being used or in CMP, no initial Connect set-up, c, us r error. Before creating cases, each of these should be explored to determine the problem. 'I no common issue is found, please escalate to an Account Manager.

# Both employers and warker, must approve all time entered into Connect.

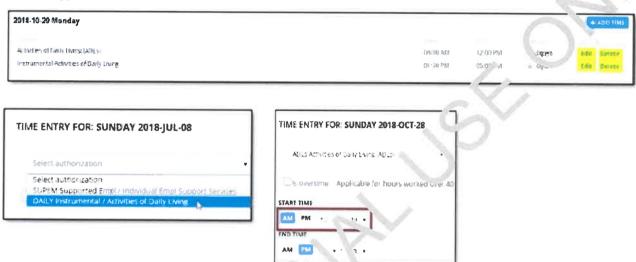
Each program has its own. Connect User Guide. For more information on special scenarios related to all programs, v'sit 1,ttps://palcofirst.com/wp-content/uploads/2021/05/AR-CONNECT-FOR-EVV-USER-GUID TIN, L.pdf

To visit contact, go to <a href="https://connect.palcofirst.com">https://connect.palcofirst.com</a>.

# **Editing Time in Connect**

Workers or employer can edit their time via Connect for both timesheets that originated in Connect or originated via EVV. Select the shift and click either "Edit" to change the time or "Delete" to remove it from the timesheet.

If editing, select the service type from drop-down. From there, make the appropriate time correction to the time.



After the timesheet is submitted, the urer vilibe asked to verify their entry. It then is sent to the other party for approval.



## Statuses in Connect

When vieving imesheets, a user will notice different status' that will let them where the timesheet is in the rrocass o payment

- Chen an open timesheet is one that has not been submitted. These are still able to be edited or deleted.
- Needs Resolution after being approved, these timesheets go through timesheet validation checks to determine if the timesheet is able to be paid out. Examples that would cause this
- status could be going over budget or using too many units, duplicate entries, overlapping services, OT, etc.) This means that the employee will need to fix the issue and resubmit for approval.

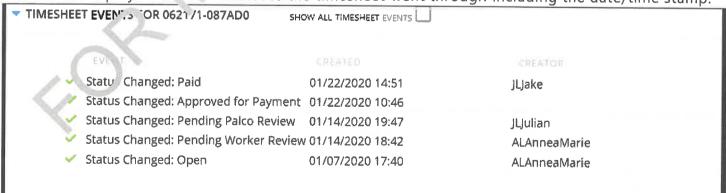
- Pending Employer Review The employee has submitted their timesheet for approval and are waiting on the employer to approve or deny the timesheet.
- Pending Employee Review- The employer has added or edited time and this must be approved by the employee before being resubmitted.
- Pending Palco Review Both employer and employee have checked and submitted the timesheet for approval by Palco. The timesheets will go through validation chec's to determine if this timesheet can be paid or denied.
- Approved for Payment The timesheet has passed validation checks and is in track to be paid on the next payroll cycle.
- Paid The timesheet has been paid to the employee via their preferred payment method.

# Viewing Time Entry in CMP

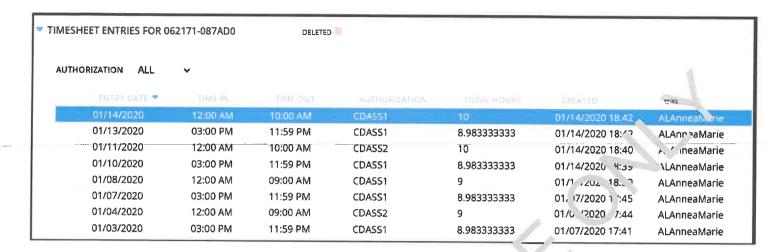
Internal users, like Palco staff and state/MCO partners, can view the time from CMP under the Account Info tab.



Events will display each of the statuses the timesheet went through including the date/time stamp.



Entries will display each of the shifts including the date of service, start time, end time, service utilized, total hours, and the time stamps associated with the shifts entry.



# Accessing Reports in Connect

In addition to being Palco's time entry system, the Connect Portal also provides valuable reports for supporting the journey of self-directed services and sup, orts. Two of those features are Spending Summaries and Payment Details. Both reports can be accessed by logging in to the Connect Portal: https://connect.palcofirst.com/.

- Spending Summaries provides quick in formation to help you easily track your utilization.
- Payment Detail provides both the employees with access to pay stub information and history

# Spending

Spending details are available only to the Employer. To access, login to Connect and select "Spending" from the tool bar in the top right of the screen.

Submit.

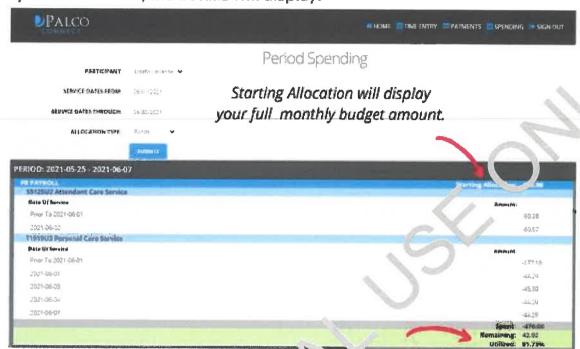


Once on the spending screen, you can enter the details for the date span you would like see.

If you are an employer for multiple participants, choose the participant you want to see utilization for.

Enter the start and and do. fr. the span you would like to see, you car foci s on one specific month or pull PARTICIPANT: Jane Doe your entire certification righted if you want to see more info. SERVICE DATES FROM: 04/01/2020 SERVICE DATES THROUGH: 04/30/2020 Under .'lloca ion Type" you can select either Funds which will display dollars or Units/Hours to display the ALLOCATION TYPE: Funds number of hours used. SUBMIT Once you have set up all of your search criteria, hit

# Once you click Submit, the details will display.



The bottom bar will display the total amount spen and total amount remaining for the month. You will also see the percento, e of the budget that was utilized.

If you spent more than you all rated budget the bar will display red. Example:

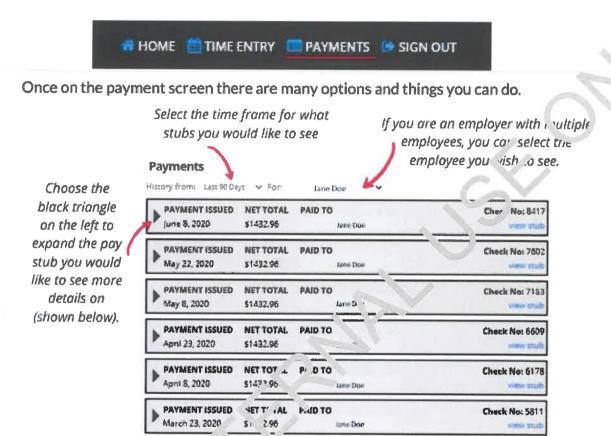


If you want to see multiple wonth, or your entire certification period, enter those dates and multiple months will display. ... the bottom of the results you will see a section called Period Totals. This section will total up all of the months within your search criteria and give you a overall snap sho. o spending.

OD TOTALS: 2021 - 01 - 2021-05-30		
PAYBOLL	Total Allocation:	1556 34
S125U2 A endant C e Service		
	Total Spend	-242.07
1903 / Insoner Care Service		
	Total Spenc:	-711:05
	Total Remaining:	803.82
NAME OF TAXABLE PARTY.	Total Utilized:	61.22

## **Payments**

Payment details are available to both the Employer and the Employees. To access, login to Connect and select "Payments" from the tool bar in the top right of the screen.



Within the expand d disple in are det ils cathe payme. \* can be seen

Payments |

NET PAY	\$327.45		
DEDUCTIONS	-\$135.31	-\$1520.68	
	\$462.75	\$5658.45	
Personal Care Services	6345.26	\$4213.88	
Attendant Care	\$117.50	\$1444.57	
EAR.4INGS			1
SCRIPTION	THIS PAYROLL	YEAR TO DATE	P
1 A 30, 2021	NET TOTAL PAID TO \$327.45 JANE DOE	Check No: 702	

By clicking on the blue "View Stub" link, a pop up will open with full stub details and ability to print.

# Reports

From the information captured by our database, we will be able to create reports based on the individual, Supports Coordinator. date of service, beginning and ending time of home visits, skills attained, and whether the referral remains in pending, transition. or active status. Examples of case exception reports may include, but not be limited to, the following:

- ✓ Referrals without a status report at 30, 45, 60, 70, and 80. calendar days post- receipt of referral from DPSQA.
- Supports Coordinator caseload sizes
- ✓ Regional Manager caseload sizes to determine when a Regional Manager's caseload size. exceeds the ability of the Regional Manager as determined by the contractor.
- Employers with three or more IBHM visits within a 12-month period; and,
- ✓ Number of FBHM visits during a specified period of time.

# Monthly Reporting to DPSQA

Outcomes of monitoring included in the monthly report to DHS will be used to improve training, Support Coordinator performince, and management oversight of the self-directed model. By the 8th day of each month, Palco provides DPSQA with a monthly report of the previous month's activities about the SDSB population which includes, at minimum, the following:

- ✓ Key SDSB Work F.an activities and related performance metrics or quality assurance and improver en issues;
- ✓ Staffing le 'els, including personnel changes, qualifications of new personnel, and information about vacancies in staffing, including number of days the position remained open;
- Management oversight;
- ✓ 1. ¬ining of counseling staff and participants, including remediation efforts and corrective. action plans implemented;
- Referrals, including the status of referrals that may require an extension;
- Enrollment information about individuals seeking to self-direct or changes in enrollment status;
- Orientation of new participants;



- Summary of Palco staffing levels;
- Changes in Palco organizational information (i.e., phone number or address changes, changes in ownership, etc.);
- ✓ Instances of IBHM by employer, county, and Supports Coordinator;
- ✓ If a participant has had three (3) or more IBHM in a 12-month period, this must be noted along with the date of each occurrence;
- ✓ Monitoring of participant outcomes, including individuals who require auditional training and home visits and how this training was executed;
- Transition services when applicable;
- Results of participant satisfaction surveys;
- Quality assurance and quality improvement initiatives;
- ✓ Instances of abuse, neglect, exploitation, or fraud, is cluding situations that resulted in reports being made to APS or CPS (Child Protective Services);
- Instances referred to the Office of Medicaid Inspector General; and,
- Health and safety concerns.

Palco will inform DPSQA staff daily and witting of the following:

- A change from a pending to an a tive status;
- A referral resulting in IA
- ✓ Status of eligibility for the self-directed service delivery model; and,
- When a case state ges from an active status to an inactive status.

A single request roll documentation shall be provided to the state within one (1) business day. Stored data will be avairage for retrieval and will include date and time of home visits, name of the Supports Coorcina or, description of the service provided or description of the findings relative to the FBF.M or IBF.M.

# Annual and State Fiscal Year Reports

Palco provides annual and state fiscal year reports to DHS. These reports summarize the year in review and include the results of the following activities:

✓ The number of employee W-2's issued.

- The number of employees not reaching the threshold limit at year-end with an accounting of the amount of funds redistributed to employer and employee accounts or returned to the Medicaid program.
- An unduplicated count of individuals receiving goods and services, total expenditures and type of services purchased by category.
- ✓ An unduplicated count of Medicaid recipients receiving services and an unduplicate α count of employees providing those services.
- ✓ The average annual service benefit and the average annual payments to enopoyees.

The annual report is due to DHS on February 28th of each year. The state fiscal year report is due July 8th of each year.

# **Complaint Report**

Palco provides DHS with a report of calls registered as complaints on the 8th of each month. The report includes the identity of the individual by name, the employer, and when applicable the employee's name and contact information, and the status of the complaint. If a complaint cannot be resolved within 15 days of the complaint or is recurring DPSQA is immediately notified via email.

# New Hire Report

Employers are required by Arkansas law to report all new hires to the Arkansas New Hire Reporting Center. Palco submits new hire reports to SDSB caregivers.

New hire reports are submit'ed electronically through the Arkansas New Hire Reporting Center's web portal here: <a href="https://www.ar-newhire.com">www.ar-newhire.com</a>

Act 1276 of the Arkansa General Assembly requires all employers to submit their new hire reports within 20 days after the employee is hired or re-hired. Employers who submit reports magnetically or electronically strain submit the reports in two monthly transmissions not more than sixteen days apart.

#### Surveys

Participent satisfaction surveys are conducted annually on all Medicaid recipients in the self-directed model to assure that all aspects of program design are meeting the needs of our clients and to gather information about how well various program elements are working. In addition, call center staff will survey a population of participants, representatives, workers, and other key stakeholders on

<sup>&</sup>lt;sup>9</sup> Arkansas Employers must report re-hires, or employees who return to work after being laid off, furloughed, separated, granted a leave without pay, or terminated from employment for 60 days or more. Employers must also report any employee who remains on the payroll during a break in service or gap in pay, and then returns to work. A rehired employee includes any individual who has been separated from employment for 60 consecutive days

a monthly basis. Results of each of these surveys will be stored in the database, so that the information can be collated and compared for emerging trends and patterns that would indicate a need for program modifications.

The annual survey response rate shall be completed on 75% of the employer population and 25% of the employee population, with results of the previous month's survey reported in the most current monthly report due by the 8th of each month. A year-to-date percentage of surveys completed for each group by calendar year and by State Fiscal Year must also be included in the monthly report. Palco will compile the results of the surveys and provide the year-to-date percentage of surveys completed for each group by calendar year and by State Fiscal Year. These result, must also be compiled and reported in the annual report due on July 1s of each year and give SFY results in the July 8 monthly report including any Financial Management Services counges that resulted from the surveys.

# **Ongoing Support**

# **Customer Support**

The role of the Palco customer service team is to provide support to self-directing Particle ants and their Authorized Representatives. The Palco Customer Support team provides kno rleageable trained staff Monday - Friday from 8am-5pm. Each team member is trained on the ollowing.

- Providing accurate information.
- Reporting any suspicion of fraud/waste or abuse.
- ✓ Beginning the enrollment process with a beneficiary through a process application.
- Assisting with questions regarding status updates, changes, or inquiries.
- ✓ Updating demographic information for anyone listed on the account.
- Answering payroll questions.
- ✓ Informing participant/caregiver of missing to, ¬s mat may be holding up their enrollment

# Mandated Reporting

Palco staff are mandated reporters of cracical incidents, fraud, and abuse.

A critical incident must be reported in imediately. If the event is immediately life threatening, call 911. All other events shall by reparted to the CM (Case Manager) or other proper authorities (APS if the matter involves an a vice of CPS if the matter involves a child) within 24 hours via the Critical Incident Reporting form Tr is form must also be saved in the individual's case files. When needed, follow-up must cour within 48 hours.

All critical incident reports are considered confidential by state law and must be treated as such by Palco staf.

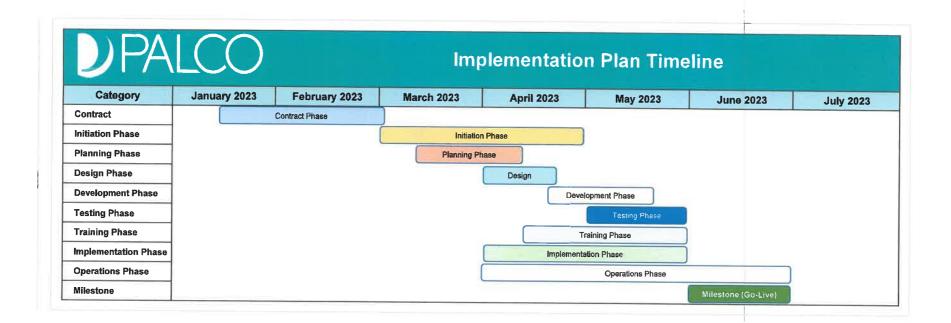
Discovery of suspected fraud and abuse will be reported to the Office of the County client resides in.

# **Additional Resources**

- ✓ AR DHS
- ✓ AR Medicaid Provider Portal
- ✓ <u>IndependentChoices Policy Guide</u>
- ✓ ARChoices Policy Guide
- ✓ Billing Manual
- ✓ DHS policy 1082
- ✓ A.C.A. §20-77-128
- ✓ AR Code § 20-38-105
- ✓ AR Code § 20-38-103
- ✓ EVV Registration

# **APPENDIX 2**

# GANTT CHART & IMPLEMENTATION PLAN





# Implementation Plan Details

Activity	Estimated Days	Estimated Hours	Assigned to	Palco Departmen
Contract Phase				
Notification of Award	1 Day	8	Alicia Paladino & Mark Biviano	Leadership
Contract Negotiations	1 Day	8	Alicia Paladino & Mark Biviano	Leadership
Contract Execution	1 Day	8	Alicia Paladino	Leadership
Initiation Phase				7" = - 11
Organize and attend Kickoff Meeting to identify programmatic goals and core operational guidelines	5 Day	80	Amelia Barnes & Victoria Evans	Operations
Schedule Transition Meeting with exiting VF/EA & VF/EA (Palco) to agree on transition process.	1 Day	8	Amelia Barnes & Victoria Evans	
Closeout Coordinator Identified with Exiting VF/EA and any other necessary key staff for the transition.	1 Day	8	Amelia Barnes & Victoria Evans	Operations
Secure File Transfer Portal (SFTP) established between exiting VF/EA & VF/EA (Palco)	1 Day	8		Operations
Enroll as a West Virginia Medicaid Provider			Mike Brower	IT Department
Recruit and Hire Customer Support Agents and Resource Consultants	1 - 2 Days	8	Paula Soll	Billing Department
Research state tax and labor laws and forms related to domestic employment and payroll taxes	60 Days	120	HR, Toni Rose & Victoria Evans	Human Resource Dept.
	1 Day	8	Stephanie Gallagher	Payroll Department
Planning Phase				
Define Palco's Implementation/Project Team	1 Day	8	Alicia Paladino & Mark Biviano	Leadership
Review, Define and document RFP Deliverables	5 Days	80	Amelia Barnes & Victoria Evans	Operations
Confirm new Portal training & dates	1 Day	4	Cody Waits	Palco Training Dept.
Draft West Virginia Customer Support scripts and FAQ	24 Days	30	Toni Rose	Customer Support
Palco Draft "Welcome to Palco" notice to Clients / Authorized Representative-Employers and Aides	1-2 Days	8	Victoria Evans	Operations
Palco Draft Support Broker Introduction letter to Participants/Representatives.	1-2 Days	8	Victora Evans	Operations
Gather new report requirements	14 Days	40	Cayle Cox	IT Department
Gather requirements for Connect (Palco Time Entry System) application	14 Days	40	Cayle Cox	IT Department
Gather requirements for Palco Case Management Portal (CMP) application	14 Days	40	Cayle Cox	IT Department
Gather requirements for Palco's online enrollment application (Intake)	14 Days	40	Cayle Cox	IT Department
Initial IT development discussion for program Application development and planning	3 Days	24	Cayle Cox, Mike Brower, Jeff Leis	IT Department
Palco creates and provides data transition templates	2-3 Days	24	Amelia Barnes & Kady Predota	Operations
	2 3 5 6 4 3	24	Alliella Barries & Rady Fredota	
Palco to Finalize Enrollment Forms and Packets with state feedback.	7 Days	28	Vistoria Evana R. Cod. Milato	Operations & Enrollment
	, bays	20	Victoria Evans & Cody Waits	Department
Palco to provide draft packets to state for approval - Employer Transition, New Employer, New Employee	7 Days	28	Victoria Evans & Cody Waits	Operations & Enrollment
	/ Days	20	victoria Evans & Cody Waits	Department
Design Phase				
Document standard inbound call verification protocol	1 - 2 Days	12	Toni Rose	Customer Support
Create and Document Resource Consulting Policies, Procedures and Training Processes	14 Days	80	Victoria Evans and Lexi Harris	Operations
Create Commucation and Marketing Plan	5 Days	40	Kady Predota	Operations
Develop Marketing Materials	5 Days	40	Kady Predota	Operations
Palco create billing process	1 - 2 Days	16	Paula Soll	Billing Department
Palco create payroll process	2 Days	16	Stephanie Gallagher & Taylor Johnson	Payroll Department
Palco to writes specifications for Intake application	5 Days	40	Cayle Cox	IT Department
Palco writes specifications for CMP application	5 Days	40	Cayle Cox	IT Department
Palco writes specifications for Connect application	5 Days	40	Cayle Cox	IT Department
Palco writes specifications for new reporting requirements	5 Days	40	Cayle Cox	IT Department
Palco writes specifications for EVV	,			п осранивени
Draft Business Rules and Process Flow Document	5 Days	40	Victoria Evans	Operations
Review Reporting Requirements and Specifications with the program	1 Day	8	Cavle Cox	IT Department
Finalize Client tracking sheet & SFTP data fields for data transfer	2 Days	16	Amelia Barnes	
Review staff recruitment and training process timeline	1-2 Days	12	Amelia Barnes & Victoria Evans	Operations Operations

Development Phase				
Publish West Virginia information on the Palco website with program forms and resources	5 Days	40	Kady Predota	Operations
Palco configure CMP application for program (Case Management Portal)	30 Days	180	Jeff Leis & Mike Brower	IT Department
Palco configure Connect application for program (Online Timesheet Portal)	30 Days	180	Jeff Leis & Mike Brower	IT Department
alco configure Intake application for program (Online Enrollment Portal)	30 Days	180	Jeff Leis & Mike Brower	IT Department
alco develop new features for CMP application, if necessary	30 Days	240	Jeff Leis & Mike Brower	IT Department
alco develop new features for Connect application, if necessary	30 Days	240	Jeff Leis & Mike Brower	IT Department
alco develop new features for Intake application, if necessary	30 Days	240	Jeff Leis & Mike Brower	IT Department
alco devlops EVV to West Virgina's specifications	30 Days	240	FiServ	IT Department
alco develops new reports	30 Days	240	Jeff Leis & Mike Brower	IT Department
Testing Phase		,		
alco test CMP Application	5 Days	40	Mike Brower	IT Department
alco test Intake Application	5 Days	40	Mike Brower	IT Department
	5 Days	40	Mike Brower	IT Department
lco test Reports	5 Days	40	Mike Brower	IT Department
alco Test EVV setup	5 Days	40	Mike Brower	IT Department
st Call Center Configuration and Activate	1 Day	4	Toni Rose	Customer Support
sst Disaster Recovery Plan; include schedule and resources	1 Day	8	Jeff Leis & Mike Brower	IT Department
est payroll system and new hire reporting	3	24	Stephanie Gallagher & Taylor Johnson	Payroll Department
meframe for computer networks to be installed and tested	7 Days	40	Mike Brower	IT Department
Training Phase				
rain Support Staff including Resource Consultants on Paico systems	30 Days	120	Cody Waits	Training Department
ovide Resource Consulting Trainings to Participants/Representatives	30 Days	120	Cody Waits & Lexi Harris	Training Department
eate training materials for all systems	10 Days	40	Cody Waits & Kady Predota	Palco Training Dept
ain Clients/Employers on Palco systems	30 Days	120	Cody Waits	Palco Training Dept
aln Customer Support Staff on West Virginia program policies and procedures	30 Days	120	Toni Rose	Customer Service
ain Employees on Palco systems	30 Days	120	Cody Waits	Palco Training Dept
rain Financial Operations Specialists on program policies and procedures	10 Days	40	Stephanie Gallagher & Taylor Johnson	Payroll Department
Implementation Phase				
alco CMP Application Live Updates Go-Live	1 Day	8	Jeff Leis & Mike Brower	IT Department
alco Connect Application Live Updates Go-Live	1 Day	8	Jeff Leis & Mike Brower	IT Department
alco Intake Application Updates Go-Live	1 Day	8	Jeff Leis & Mike Brower	
emonstrate all outstanding issues have been addressed	1 Day	8	Amelia Barnes	IT Department Operations
eview database modification to meet all requirements of this contract	1 Day	8	Jeff Leis & Mike Brower	IT Department
	IDay	-	Alicia Paladino, Mark Biviano, Jeff Leis	11 Department
eview the contingency plan for operations during an emergency situation	1 Day	8	& Mike Brower	Leadership & IT Dept.
erform Readiness Review to demonstarte completeness	5 Days	8	Amelia Barnes	Operations
eceive Readiness Review Approval	1 Day	8	Amelia Barnes	Operations
Operations Phase				
onfirm with exiting FMS 2023 Pay Schedule dates are correct	1 Day	8	Taylor John'son	Payroll Department
int any required forms that will be unable to be completed web-based and prepare mailing plan	10-15 Days	40	Cody Waits:	Enrollment Department
ellect Transition Enrollment Paperwork for EORs and Employees	45 Days	400	Cody Waits	Enrollment Departmen
onfigure automated triaging of common CS calls	1 Day	8	Toni Rose	Customer Support
nfigure call queue (e.g. general inquiries, Spanish speaking, after hours VM)	1 Day	8	Toni Rose	Customer Support
onfigure IVR systems and call prompts	1 Day	4	Toni Rose	Customer Support
tablish a dedicated toll-free telephone number with voicemail and call queue capabilities and the capacity to track all communications from				castomer support
ly source	1 Day	8	Toni Rose	Customer Support
tablish designated Toll Free E-Fax account	1 Day	4	Toni Rose	Customer Support
tablish EFTS account for Federal Tax Deposit, banking, funding, program funds, adminstrative fees	1 Day	8	Stephanie Gallagher	Payroll Department
tablish/setup Accounting system and general ledgers	2 Days	16	Stephanie Gallagher	Payroll Department
tablish relevant email accounts	1 Day	4	Mike Brower	IT Department
stablish TDD/TTY line				

1st data transfer via SFTP using Template	1 Day	8	Amelia Barnes	Operations
2nd data transfer via SFTP (Changes to legacy data & New Client / Employer / Employee data)	1 Day	8	Amelia Barnes	
3rd data transfer via SFTP using Template (Changes to legacy data & New Client / Employer / Employee data)	1 Day	8	Amelia Barnes	Operations
4th data transfer via SFTP (Utilized funds)	1 Day	9	Amelia Barnes	Operations
5th (Final) data transfer via SFTP (Client/Employer/Employee names, Demographics, and Final 2023 gross wages)	1 Day	8	Amelia Barnes	Operations
Transfer SUTA log-in information to Palco	60-90 Days	650	Stephanie Gallagher	Operations Operations
Mail Resource Consulting Introduction Letters	2 Days	8	Victoria Evans	Operations
Resource Consultants make Introductory phone calls to Participants/Representatives	30 Days	360	Victoria Evans	Operations
Send out Transition Enrollment Paperwork	10 Days	40	Cody Waits	Enrollment Department
Milestone				
Start of first payroll with Palco	1 day	1	Stephanie Gallagher	Payroll Department
First Payroll Processed and Paid Out	7 days	40	Stephanie Gallagher	Payroll Department

-

# **APPENDIX 3**

# SAMPLE MEMBER/ REPRESENTATIVE-EMPLOYER ENROLLMENT PACKET



PO Box 242930 Little Rock, AR 72223 Toll Free 866.710.0456 Online: PalcoFyst.com

# West Virginia Personal Options Employer Enrollment Packet

Thank you for choosing Palco to direct your care. This packet contains all the forms you need to enroll as an employer in self-direction and begin paying your worker. Place make sure to follow all directions in this packet.

You	must complete and return:		
	Member Referral & Intake		WV-ARI-001 A orization
			Release Information
_	Desired the of Occurrents	_	00.4
Ш	Designation of Surrogate		Form SS-4
	Representative/Employer (Optional)		
	Representative/Employer Responsibilities		S Forn
_	Attestation		
		1	<b>7</b>
	Representative/Employer Authoriza	1	IRS Form 8821
	Agreement		
	MAY 2050 Authorization of Dougs of Att		
Ш	WV 2858 Authorization of Power of Attanhe	,	

Failure to return these forms will a venice to the encourage you to use the checklist above as a final review of fore you reter the forms to Palco. The other documents, including information on how to only the forms, a payment schedule, Palco's Notice of Privacy Practices, F.A.Q. and so lar instantal forms, are for informational purposes only and do not need to be returned to Palco Send ompleted paper forms by fax, email or mail to Palco at the address w.



Email: enrollment@palcoirst.com

Palco, Inc. Attn: Enrollment P.O. Box 242930 Little Rock, AR 72223

Visit our website to download an intake form OR contact customer support to get connected to an enrollment specialist. You must complete a consent form before receiving an email with your login instructions. Follow the instructions in that email to complete your enrollment.

Should you need any assistance during this process, please contact a friendly customer support representative at 1.866.710.0456 or info@palcofirst.com.

We look forward to serving you!

Sincerely, The Palco Team



# Frequently Asked Questions

Palco serves individuals who participate in the self-directed model by providing various financial, customer support, and informational services. Below are frequently asked questions to help you understand our processes, your requirements, and how to receive assistance.

# How do I complete forms if I am unable to sign?

We encourage you to enroll online, as there are plenty of accessible options of website. However, if you are unable to use our online system, you may either sign with an or a mark, then have a witness legibly sign the document on the line above the 'witnessed by'.

# What if I need assistance in completing forms?

Online enrollment is the easiest method for completing forms. Palco customer support agents can assist you in gaining credentials to enroll online. Or, if you would prefer, our staff a provide in-person assistance with completing forms.

# When can the worker begin providing services?

Palco will notify the employer and the worker once a quire ants for a roll ent have been met. The date of this notification is the date work can begin Any work erforme for to that date will not be paid by the program.

#### Can a worker provide services to multiple ticipa

Yes. However, a worker must abide by all prog les, e cially those regarding overlapping claims for payment of services.

What happens if a worker wants which is the or she would like. Each time he or she begins working for a new employer, a new work packed hust be completed, just like getting any new job. However, some requirent way be ward depending on the circumstances, such as providing a copy of Social Security and secure attended to receiving direct deposit. Generally, background checks can also transform sure to check with your program rules to make sure you understand all the requirement

# What happers if a worker stees providing services?

Anytime a orker point of service, Palco must be notified via an Employment Separation Notice, which is found in our website. Even after termination, workers should keep Palco aware of any changes in contact is primation throughout the year, so that we can send correspondence, such as W-2s, to the correct as send correspondence.

# How does a participant change an employer of record?

A Designation of Surrogate Employer form must be completed. Be sure to include the date of the change at the top of the form.

# How does an employer of record change impact existing workers?

Workers must re-complete some new hire forms, such as the I-9. Palco will notify you of the requirements. Be sure to complete any required forms so that your pay is not impacted.

Page 1	of 2
EN-	-FAQ-1.0



# **Notice of Privacy Practices**

Palco may receive and create records concerning your medical and individually identifiable information ("PHI") and is required to maintain the privacy and security of your PHI. Please read this notice carefully. If you have questions or concerns, contact the Palco Privacy Officer at <a href="mailto:privacy@palcofirst.com">privacy@palcofirst.com</a>. Palco will only use and disclose your information as allowed by law and as described below:

- Help manage the health care treatment you receive. We may disclose you information to provide treatment and administer services, including performing assessments, issuing orkers' compensation and administering similar programs, and recommending services in some quations. It is may disclose information to others who implement your health services. We may controlled in your and/or your designated representative (e.g., surrogate employer or authorized user). All expressions and corresponding programs are treatment your disclose information to others who implement your health services. We may controlled in your and/or your designated representative (e.g., surrogate employer or authorized user). All expressions are treatment your acceptance from Palco is encrypted and secure. By emailing Palco with your personal email account you accept the risk that your correspondence may not be encrypted, nor secure.
- Run our business, including payment for and administration of your health serves. We may use and disclose your information to receive and issue payment on you behalf and bill Medicaid, Medicare, Managed Care Organizations, the Veterans Administration of the receive as received by your program.
- Comply with federal and state law, including investigation by the Unit States Department of Health and Human Services (U.S. DHHS) and lave inforcement. Paleo may be required to disclose your information to coroners and other officials at your path.
- Respond to legal actions and health overs such awsuits or quality assurance reviews. Palco may be required to respond to requests, it is a q disc ary, subpoenas, audits, and other legal or regulatory matters.

# You have the right to:

- Authorize the use and disclosur
  PHI r reasons not authorized by federal or state law.
  Palco will seek your approval to disclosure.

  You convert a copy of this notice or view the posting at
- Receive this notice of privacy practic You can request a copy of this notice or view the posting at palcofirst.com, in enrolling the lets, and it ogram manuals, as applicable. Palco can change the terms of this notice at any time. The letter apply to all of your medical records. Direct complaints to the Privacy Officer or the U.S. DHHS.
- Review and receive copie of our records and a list of disclosures. Requests must be on a Request for Sensitive solds. We will ovide you with a copy or summary within 10 days of receiving your request. We may courge a reasonable ost-based fee for collection of the records, including postage and labor. Palco managed to sense the required by law.
- Request per ints to pur ecords. Requests must be on a Request to Amend Sensitive Information. We will prove you with a py or summary or a rejection within 15 days of receiving your request.
   Request information in alternate format or restrict access on your records. Requests must be in
- Request information in alternate format or restrict access on your records. Requests must be in
  writing on a Request. We diditional Privacy. We will provide you with a copy or summary within 15 days of
  receiving your request. We may reject or terminate the request in certain limited cases and will notify you of
  rejections and terminations.
- Be notified in case of a breach of your sensitive information. You will be notified within 60 days by the Privacy Officer.
- Choose someone to act on your behalf with regard to your records. You must complete the appropriate
  forms and information to designate Authorized Users in order for those individuals to communicate with
  Palco on your behalf.



Can someone correspond with Palco on my behalf?

Federal and state privacy laws prevent Palco from disclosing personal information to unauthorized individuals. Palco will only correspond with workers about that worker's particular account. Surrogate employers may receive all information about the worker's accounts and information about the participant necessary to carry out employer roles. Participants have unlimited access to information held by Palco on their account. Participants may appoint an authorized user by completing an Authorized User Designation form.

# What if a worker doesn't receive the funds on the scheduled payday?

For direct deposited payments, please allow sufficient time for the pay to descript into your account. We recommend allowing 24 hours after payday for the deposit

# Will the worker receive a W-2 at year-end?

W-2s are available January 31. If receiving the W-2 by mail, please allow on week for delivery. All attendants receive a W-2. Workers who earn less than the annual domestic service the shold, per IRS Pub. 15 (Circular E), will also receive a refund of over collected. CA. The employer hould encourage their workers to make sure that the correct address and direct deposit information is current with Palco prior to this date, even if the worker is no longer working.

# How do I change my information with Palco?

The fastest and easiest method is to log into your count and change your information. Otherwise, you must complete the appropriate form and management ax it to Palco. All forms are found at palcofirst.com. For name and contact inform and attach documentation to show proof of name and attach documentation to show proof of name and palcofirst.com and attach documentation to show proof of name and palcofirst.com and attach documentation to show proof of name and palcofirst.com and attach documentation to show proof of name and palcofirst. W-4, or Payroll Information Worksheet. To change payment information, the letter a Diect by osit Authorization. For any other changes, contact Palco customer support.

# How can Palco be contacted?

Palco Customer Support Statives as available Monday through Friday, 8:00 a.m. to 5:00 p.m. CST, except state holid s. Ye was reach us by phone at 501.604.9936 or toll free at 1.866.710.0456, email to company palcofirst.com, fax to 501.821.0045 or mail to P.O. Box 242930, Little Rock AR 7222 alco has a range of translator and interpreter services at your request.

Page 2 of 2 EN-\_\_\_\_-FAQ-1.0



# **PALCO PAYMENT SCHEDULE - 2023**

# **West Virginia Personal Options Program**

## Service Period

#### MONDAY SUNDAY Start Date **End Date** January 2, 2023 January 15, 2023 January 16, 2023 January 29, 2023 January 30, 2023 February 12, 2023 February 13, 2023 February 26, 2023 February 27, 2023 March 12, 2023 March 13, 2023 March 26, 2023 March 27, 2023 April 9, 2023 April 10, 2023 April 23, 2023 April 24, 2023 May 7, 2023 May 8, 2023 May 21, 2023 May 22, 2023 June 4, 2023 June 5, 2023 June 18, 2 June 19, 2023 July 2, 202 July 3, 2023 July 16, 2023 July 17, 2023 30, 2023 July 31, 2023 2023 August 14, 2023 Augu 27, 202 August 28, 2022 Septembe September 11, 20 tember 2- 123 September 25, 202 2023 October 9, 2023 ctober 2z. 2023 0 2023 November 5, 2023 November 19, 2023 vember 6, 2023 vember ecember 3, 2023 er 4, 2023 December 17, 2023 December 18, 202 December 31, 2023

# **Timesheets** Due by 12 am

# TUESDAY Deadline January 17, 2023 January 31, 2023 February 14, 2023 February 28, 2023 March 14, 2023 Marci. 2023 April 11. 5, 20 Ma 2023 Ma 3, 2023 ne 6, 2023 une 20, 2023 √ 5, 2023\* July 8, 2023 August 1, 2023 August 15, 2023 August 29, 2023 September 12, 2023 September 26, 2023 October 10, 2023 October 24, 2023 November 7, 2023 November 21, 2023 December 5, 2023 December 19, 2023 January 2, 2024

# **Payments** Made by Palco by 5pm

# FRIDAY Paid On January 17, 2023 Febry 10, 2023 Fall Lary 24, 202 arch 10, 2 N. h 2 2023 Apr. , 2023 ril 21, 2023 May 5, 2023 May 19, 2023 June 2, 2023 June 16, 2023 June 30, 2023 July 14, 2023 July 28, 2023 August 11, 2023 August 25, 2023 September 8, 2023 September 22, 2023 October 6, 2023 October 20, 2023 November 3, 2023 November 17, 2023 December 1, 2023 December 15, 2023 December 29, 2023

January 12, 2024

time submissions and mistakes may result in late payment!

#### 2023 Office Closures

New Year's Day - Monday, January 2\* Martin Luther King, Jr Day - Monday, January 16 Columbus Day - Monday, October 9 President's Day - Monday, February 20 Memorial Day - Monday, May 29\* Juneteenth Day - Monday, June 19 Independence Day - Tuesday, July 4\*

Labor Day - Monday, September 4\* Veterans Day - Friday, November 10 Thanksgiving - Thursday-Friday, November 23-24\* Christmas - Monday, December 25\*

<sup>\*</sup> Palco Office Closures



# **Instructions for Employer Forms**

Please use the instructions below to complete the attached Palco forms in order to become an employer through the West Virginia Personal Options Program.

- The **Member Referral and Intake** is used to enroll the participant/client in the program and establish the employer of record. Complete the entire form.
- The **Designation of Surrogate Representative/Employe** used to stablish a surrogate Employer of Record on behalf of the participal client, amplete the entire form. Sign and date the highlighted fields at the botton, for the 2. <u>This rm</u> is applicable only when the participant/client is not the employed.
- The Representative/Employer Responsibility & Attestation at lines the responsibilities of the employer. Complete, sign, d date the four highlighted fields at the bottom of the page. This pould complete d by you or, if applicable, by the individual you design to as you Surre to imployer (Employer of Record).
- The Representative/Employ Authorized Authorized Palco's responsibilities as the fiscal/ ver-as t and authorized Palco to ensure compliance with the IRS and the federa and state tax authorities on the employer's behalf. Complete, sit, and date the four highlighted fields at the bottom of the page.
- The WV 2858 Authorization of record of Attorney gives Palco the authority to provide an environment of an and to perform any and all acts that Palco can perform on our calf as a employer with respect to any West Virginia unemployment components. ONLY complete and sign the highlighted fields on the page.
- to provide the without of the authority to provide the authority and only in behalf as the employer with respect to any West Virginia tax withholding retters. Complete, sign and date the highlighted fields on the page.



PO Box 242930 Little Rock, AR 72223 Toll Free 866.710.0456

Online: PalcoFirst.com

# Member Referral & Intake

Complete this form entirely to enroll the participant/client, provide important information to continue the enrollment process, and establish the employer of record.

	MEMBER	INFORMATION	
First Name	Middle Na	me	Last Name
Social Security Number	Date of Bi	rth (mm/dd/yyyy)	Gender □ Ma □ Fem
Physical Address (Street Ad	dress, Including A	pt. #)	
City	State	Zip	Cou
Mailing Address (Street Add	ress, Including Apr	t.#) – if differen	on the physical address
City	State		unty
Phone1	Email		eferred Method of Communication Email
funds provided under the directed employer of recorrectuiting, hiring, training participant/client, and submitting time reers or vendors the pan pan employer of record.	This of one ambourd on ambourd on ambourd on ambourd on a minary on a minary of the may also one of the ma	ay incide eith ted attendant caregivers and schedules, o include directire to use. This reemployer of recommendations are to the complex of t	nber or someone over the age and direct these services and her agency-provided, agency-t care. The tasks may include who provide support to the completing enrollment forms, ag budgeted funds to providers esponsibility is known as the ord? (Select one.)
articipar :lien		Toto u Dosigilati	on or ourrogate Employer.
How would you are to continu	ue the enrollment	orocess?	
•			ord will receive login instructions
☐ Email a prepopulated PDF	packet to the Em	ployer of Record.	

☐ Mail a prepopulated paper packet to the Employer of Record's address



PO Box 242930 Little Rock, AR 72223 Toll Free 866.710.0456

Online: PalcoFirst.com

By signing below, the member consents to complete enrollment electronically and has provided an email address and Social Security Number that belongs to him and her. The participant/client understands that Palco is not responsible for providing information to an incorrect email address supplied by him and her. The participant/client has read and agrees to Palco's Notice of Privacy Practices and the Terms and Conditions of Palco's online enrollment system and agrees to receive information, notifications, and other correspondence electronically to the email address provided in this document. Such correspondence may contain Personal Health Information as defined at 45 CFR 160.103 and other personal Health Information. The member accepts all risks associated with the transmission of such information via those channels. The member understands the distorches onsent is in effect until Palco is notified in writing that the member without is such consent.

	If the participant/client is ble t gn, pleas vitness:
Member Printed Name	
	Witnes: Inted N.
Member Signature	
Date	ess Signature
Please return this form to	Pate
via email: enrollment@pale Trs.	
or via fax to 1.877.859.8757.	
OI VIA IAX to 1.077.059.0757.	



# **Designation of Surrogate Employer**

<ul> <li>☐ Check this box if this form is participant/client's account. I will be effective starting the r</li> <li>☐ Check this box if revoking participant/client's account. I Name of Employer being term</li> </ul>	Effective danext scheduge current [  Effective da	ite of change: iled service po Designated S	:/ eriod afte urrogate	/ r paperwor Employer	This change k is processed.
	MEMBER	INFORMATION	ON	TE CONT	WHEN - 11 M - 1
Full Name	ID / Last 4	of SSN	Program:	WOI	
The employer of record must rec support to the participant/client completing enrollment forms, and must be over the age of 18, demonstrate knowledge about and respect for to act on the participant/client's b	t. This incled submitting constrate as the participe that the participation the participation that the participation the participation that the participation the participation the p	timesberts tronc anni. par lient's p	The mp	ker tasks loyer of e par ipa use	and schedules cord functioning int/client, display
REPRESE First Name		more tourness	FORMAT	of the same of the	
i iist ivanie	Middle N	1 1	Last Na	ne	
Social Security Number	Email		Date of	Birth (mm/do	d/yyyy)
Relationship to Participant/client  ☐ Parent ☐ Spouse ☐ Chi		ıardian	□ Power o	of Attorney	Gender □ Male
☐ Other Non-relative ☐ Oth	4				☐ Female
Physical Address (Stree Address	cluding)	#)			
City	State	Zip		County	
Mailing udress (Street Add) s, Inc	luding Apt. #	) – if different th	an the phy	sical addres	SS
City	State	Zip		County	
Phone1 Pho	one2	Р	referred Me	ethod of Cor	mmunication

The representative/employer does not receive monetary compensation for directing care on the member's behalf in the course of the consumer-directed program. Representative/Employers cannot provide direct support services to the member. Employees must have no convictions involving exploitation, abuse, or assault on another person and must be fully capable of the responsibilities associated with managing support staff and handling financial aspects of the consumer-directed program, including proper utilization of the budget and verifying the accuracy of reports provided by Palco.

□ Email

☐ Phone / Voicemail

☐ Mail



By completing this form and signing below, all parties agree that the individual named herein shall accept the responsibilities of the employer of record. The representative/employer consents to complete enrollment electronically and has provided an email address and Social Security Number that belongs to him and her. The employer understands that Palco is not responsible for providing information to an incorrect email address supplied by him or her. The employer has read and agrees to Palco's Notice of Privacy Practices and the Terms and Conditions of Palco's online enrollment system and parees to receive information, notifications, and other correspondence electronically the email address Such correspondence may coronal Health provided in this document. Information as defined at 45 CFR 160.103 and other personal dentifiah Information. The employer accepts all risks associated with the transmission sug information via those channels. The employer understands that his or her consent effect ur is notified in writing that the representative/employer withdraws such sent



Employer Revocation Attestation: I understand that by signing this form the current surrogate employer listed on this form will be made inactive and terminated in the Palco system. If a surrogate employer is required and or a new surrogate employer has not been designated by the effective date listed above, then your services as a member will be suspended. Service provided during the suspended period may not be eligible for payment by Palco if the proper employer/ employee relationship is not established.



PO Box 242930 Little Rock, AR 72223 Toll Free 866.710.0456

Online: PalcoFirst.com

# **Employer Responsibilities & Attestation**

As the employer of record, I understand that I am the sole representative/employer for all support workers providing services to the member. The representative/employer controls the training and management, evaluation, scheduling, and termination of the worker. The worker is not employed or retained by Palco, program/state administrators, or any other state or federal governmental agency. The worker is not an independent contractor.

As the representative/employer, I must adhere to all federal, state cal, program, and employment-related (including all Department of Labor, United cates Citiz iship and Immigration Services, Internal Revenue Service, and state is and remployment agency) laws, regulations, and requirements, as well as program and policy his includes providing necessary training and orientation to workers, sporting incidents, and reporting suspected fraud, waste, abuse neglect, or explicit to

Funds to pay for services provided by worken're from public sources, and financial accountability and liability applie. the of the funds. representative/employer and worker have lividua and joint responsibilities to be accountable for the funds s wough the program and understand that submitting false or fraudulent timesheets on and inquests for payment of goods or services IDI provided, other than those approved on thorized service budget, will be reported to the appropriate authorities for invessation and possible prosecution as fraud. In the case of insufficient fund program penses, as the representative/employer, you are responsible for pay, and to representative/e ploss must an aintain accurate records and provide such records to authorized arties a quested, as well as adhere to all program rules and regulations, including Palco's Private Policies.

By spring ow, I a est mat I have read, understand, agree and attest to the above and have understand my weller accordingly.

Printed Representative/Employer Name	ID# / Last Four of SSN	
Representative/Employer Signature	Date	



# **Employer Authorization Agreement**

As the employer of record, I understand that I have certain responsibilities, such as filing and paying employment taxes for my workers and other employment-related responsibilities falling under Internal Revenue Service (IRS) guidance, Department of Labor (DOL), and agency/programmatic guidelines and regulations. Palco, Inc. will act as my agent in a limited scope and on my behalf for only the tasks related to this program and as listed below, notwithstanding approval by the IRS or other state gencies.

- To perform all duties as the Fiscal/Employer Agent as require by control, policy regulation, federal and state statues, and other applicable regulations.
   To obtain a Federal Employer Identification Number (FEIN), fix Prorm 267 to
- represent me for program-related and employer-related tax poses, tax reports, and correspond with the IRS regarding FEINs or employer to information.
- To establish and register me as an employer in the state in which takiness is conducted.
- To be my agent for the limited purposes of the limited and state unemployment tax purpose includin applying the state and/or local income tax withholding and state unemployment identification number(s), establishing online account(s) to file a pay axes on my behalf, and receiving correspondence related to my agram ated state and/or local income tax withholding and state unemploys ax account(s).

  To receive confidential information and the program at the budget and/or spending plan.

  To apply for and established a comply with a payed audit as with a payed audit and a payed audit as with a payed audit and a payed audit and a payed audit and a payed audit as with a payed audit and a payed and a pa
- workers' compensation and comply with annual audit requirements, when permissible by state and prompt am policies.
- To provide liming information my behalf with regards to benefits, appeals, and as required by w to surfax, lawr, and other disputes.
- To complete fee ral a second as related to the employer duties vi erated above.

This athorization revolves all earlier authorizations and powers of attorney on file and shall emain a process of earlier authorizations and powers of attorney on file and shall emain a process of earlier authorizations and powers of attorney on file and shall emain a process of earlier authorizations and powers of attorney on file and shall emain a process of earlier authorizations and powers of attorney on file and shall emain a process of earlier authorizations and powers of attorney on file and shall emain a process of earlier authorizations and powers of attorney on file and shall emain a process of earlier authorizations and powers of attorney on file and shall emain a process of earlier authorizations and powers of attorney on file and shall emain a process of earlier authorizations and powers of attorney on file and shall emain a process of earlier authorizations and powers of earlier authorizations are considered as a process of earlier authorizations are considered as a process of earlier and email and the process of earlier and email and y authrize Palco, Inc. to act on my behalf for the items listed herein and attest that I underst lid these responsibilities and agree to the terms of this Employer Authorization Agrament.

Printed Representative/Employer Name	ID# / Last Four of SSN	
Representative/Employer Signature	Date	

WV-2848 Rev. 12/15

# West Virginia State Tax Department

Authorization of Power of Attorney

Authorization giving the person you name on this form specified powers to act on your behalf in interacting or communicating with the West Virginia State Tax Department

Type or print the information you provide on this form. Incomplete, faxed, or photocopied forms will be REJECTED.

	. medifficie, faxed, of photocopied form	
1   PRINCIPAL INFORMATION The business	or individual granting the power of attor	ney
Print Name of Individual or Business	SSN, FEIN, or Tax ID#	Phone #
		T HONG #
Print Name of Spouse or Corporate Officer and Title	SSN, FEIN, or Tax ID#	Dhone #
Time Name of Operate of Corporate Officer and Title	SSIN, FEIN, OF TAX ID#	Phone #
Address	011	
2   AGENT INFORMATION The individual(s) re	City Sta	te Zio
2   AOEIII IIII OliviA IIOII IIIe ilidividuai(5) le	ceiving the power of attorney	•
Print-Name of Agent	SSN, Bar#, or CAF#	hone #
Address	City	Zip
3   EXPIRATION The powers granted by this auth	orization are valid until	
☐ Revoked.	Liability for delinquent tax or taxes listed	w is seed.
☐ (Month/Day/Year) ☐ (	Other (explain)	
4   AUTHORIZATION		
4A DESCRIPTION OF MATTER Description of the lim	nits of the izatio	
	onth, acter, c par Ot urn	
	ate ath if Estat axes)	
4BI ACTS AUTHORIZED Check ONE of the Followin		
□Full Authority I hereby give the named	hove horization to act on my	behalf in interacting or
communicating with the WV State Tax period during which I am liable for assess nt/pa,	the above listed taxes; to sign ar	erning me; to extend the
and sign agreements settling matters in disp	his Power of Attorney to another	no return forms; to make
in writing; and to receive (L +2 endorse a). 3sh	any checks issued by the WV Tax Dep	person approved by me partment
	•	
Department with the followin estrict S.	e authorization to act for me in dealing	with the WV State Tax
Department with the following estilic s.		
nature of Date	Signature of Spouse	Date
(Signature Com Officer in a business)	(if any returns listed above are joint re	turns)
	ONLY ONE of the following.	
If the power of attorney is gran to a person other than an a	attorney or certified public accountant, the ta	expayer(s) signature must
be witnessed or not	_	
■ Witness The person(s) signing as/for the taxpayer(s)		or the taxpayer(s)
is/are known to and signed in their presence of the two	appeared this day before a notary	
disinterested witnesses who have signed below:	acknowledged this power of attorn and deed:	ey as a voluntary act
	and deed.	
O'entration of Miles and D. I.		
Signature of Witness   Date	Signature of Notary	/   Date
Talanhana #		
Telephone #		
	NOTABLE	
Signature of Witness   Date	NOTARY SEAL	
	OLAL	
Telephone #		
TAX OFFICE USE ONLY: REJECTED ATTACHED NOTED		

# WV-ARI-001 Rev. 7/14

# Authorization to Release Information

West Virginia State Tax Department

Na	me of Taxpayer	xpayer Date			
Ad	dress	Daytime Telephone			
Cit	у			State Zip Code	
We	est Virginia Identification, SSN, FEIN, or C	Other			
Th §1	e above named taxpayer does hereby \ 1-1A-23 to the following extent:	waive the co	nfide	ntiality provisions of West Virgo Code §	11-10-5d and/o
1.	Persons to whom information may be	released:			
Na	me			Capacity	_
	dress				/
Cit	У,			State to C	
<b>2</b> . l	Effective period of this waiver				
	Authorization terminates				
	month	day		sar	
_	Until my liability for the delinquent tax or	taxes checke	4	aragraph below, is so ned.	
Ш	Other (explain)				
		1			
3.	Taxes and/or credits to which this waiv	er applies	1		
	4	WV Coc	A .		WV Code
	Beer Barrel Tax	1	13	Minimum Severance Tax on Coal	11-12B
	Business and Occupation Tax	1-13		Motor Carrier Road Tax	11-14A
	Business Franchise Tax	11		Personal Income Tax	11-21
	Business Registration Tax	11-12		Property Taxes	
	Charitable Raffle Boards & G	47-23		Severance Tax	11-13A
	Consumer Lies and Service I	11-15		Solid Waste Fee	20-5F
	Corpora License T	11-12C		Soft Drink Tax	11-19
	Corporate ome Tax	11-24		Strategic Research and Development Tax Credit	11-13R
	Economic Opportunity Tax edit	11-13Q		Telecommunications Tax	11-13B
	Employers Within ax	11-10		Tobacco Products Excise Tax	11-17
	Estate Tax	11-11		Use Tax	11-15A
	Gasoline & Special Fuel Excise Tax	11-14		Wine Liter Tax	60-8
	Health Care Provider Taxes	11-27		All of the above applicable to the taxpayer	
	IFTA	11-14B		Other Taxes (as listed below)	
	Manufacturing Investment Tax Credit	11-138		,	
<b>4.</b> l	nformation to be released (describe sp				
_	•				
_					

5. Reason(s) why information is to be released:
- Trouverile, with intermitation is to be released.
This waiver will be effective only to the extent explained above and any other release of information is not permitted without additional authorization. Additionally, information will be released only to the extent the Tax Commissioner believed disclosure is necessary to comply with this Authorization to disclose information, and will not be disclosed to the extent the Tax Commissioner determines that disclosure would seriously impair administration of this State's tax laws.
This authorization must be signed by the taxpayer, or taxpayer's authorized representative, and the signature of the person signing the authorization must be notarized. Documentation of fiduciary relationships (e.g. Guardianship, POA, Trusted Executrix) must be attached. Please note that original signatures are required. Faxed, photocopied or stamped signature are unacceptable.  Authorization is for:
<ul> <li>release of personal income tax return(s); if jointly filed personal income tax runn is required, the authorization must be signed by either the husband or the wife.</li> <li>release of a return filed by a business that is a sole proprietorship, the authorization at the signed of the business or by an employee of the business, or other person, who is authorization sign the authorization.</li> <li>a corporation, the authorization must be signed by its president, vice president, treasure assist at treasurer, chie accounting officer or other person duly authorized to sign the authorization.</li> <li>release of a return filed by a partnership, as defined for federal some tax purposes, the authorization must be signed by the managing partner, or tax matters partnershany of an opartner or exployee of the partnership authorized to sign the authorization.</li> <li>release of a return filed by a limited liability company a authorized to sign the managing member tax matters member, or any other member or entropyee of the mited liability company authorized to sign the authorization.</li> <li>a return filed by an estate or trust, the authorization must be signed by the executor or executrix of the estate, of the trust.</li> <li>for information other than a tax return, the authorization must be signed by a person who could authorize release of taxpayer's tax return.</li> </ul> Print Name Signed Capacit State of



# **Employer IRS Forms Instructions**

Please complete the attached IRS forms to become an employer through the self-directed program. Use the instructions and checklist below to guide you through this process. All areas highlighted in yellow on the forms must be signed.

•	IRS Form SS-4 gives Palco the ability to file for a FEIN ederal Employer
	Identification Number) with the IRS on your behalf. This is remed of all employers in the United States.
	☐ Print your full name on Line 1.
	☐ List your county and state on Line 6.
	☐ Print your full name on Line 7a.
	<ul> <li>Print your Social Security Number (SSN)</li> <li>This must match the SS'</li> <li>Social ecurity Card.</li> </ul>
	If you already have a _IN unc your \\ rint your FEIN on Line 7b, instead your \\ your \\ assignment letter from the IF  If you already have a _IN unc your \\ your \\ send \text{alco a copy FEIN} \\ assignment letter from the IF  If you already have a _IN unc your \\ your \\ your \\ assignment \text{alco a copy FEIN} \\ assignment \text{alco alco a copy FEIN} \\ assignment \text{alco alco a copy FEIN} \\ assignment alco alco alco alco alco alco alco alco
	☐ Print your name, sign date e bottom of the form.
	If you already have an FEIN up er our SS, please send Palco a copy FEIN assignment letter from the IRS.
•	IRS Form 2678 appoints also as our agent only for the limited purposes of payment entrangement payron was for the participant's worker.
	☐ Print pur from a Line 2.
4	Print address in the appropriate spaces on Line 4. Be sure to comple all three rows as applicable.
	□ Print you name, sign, and date at the bottom of the form.
•	IRS Form 9 1 allows Palco to correspond with the IRS on your behalf for the limit see of the self-directed program.
	<ul> <li>Print your full name and address in the appropriate space in Box 1.</li> <li>Print your name, sign, and date at the bottom of the form.</li> </ul>

(Rev. December 2019)

Department of the Treasury

Application for Employer Identification Number (For use by employers, corporations, partnerships, trusts, estates, churches, government agencies, Indian tribal entities, certain individuals, and others.) ▶ Go to www.irs.gov/FormSS4 for instructions and the latest information.

OMB No. 1545-0003 EIN

Interr	al Revenue						
	1 Le	egal name of entity (or individual) for whom the EIN is being I	eque	ested			
Type or print clearly.		ade name of business (if different from name on line 1)	3	Executor, administrator, trustee Palco, Inc. as 3	e, "care of" name 3504 Fiscal Employer Agent		
int cl	4a M	ailing address (room, apt., suite no. and street, or P.O. box)  Box 242930	5a	a Street address (if different) (Don't enter a P.O. box.)			
or pr		ity, state, and ZIP code (if foreign, see instructions) ittle Rock, AR 72223	5b	City, state, and ZIP code (if fore	elgn, see instructions)		
Type		ounty and state where principal business is located					
	7a Na	ame of responsible party		7b SSN, ITIN, or EIN			
8a	(or a fo	application for a limited liability company (LLC) reign equivalent)? Yes	X	8b If 8a is "Yes," enta	nur / of		
8c	If 8a is	"Yes," was the LLC organized in the United States?			· · · · es  No		
9a	Туре о	f entity (check only one box). Caution: If 8a is "Yes," see th	e ins	tructions for correct box to c			
	☐ So	le proprietor (SSN)		☐ Esta SN of deceder	nt)		
	☐ Pa	rtnership		Plan ac. trator (TIN			
	☐ Co	rporation (enter form number to be filed)		(TIN c ntor)			
	☐ Pe	rsonal service corporation	A	☐ Mil //Nation. 'ard	State/local government		
	☐ Ch	urch or church-controlled organization	1	Far s' cooperat	Federal government		
	☐ Ott	her nonprofit organization (specify)	25	□ в с	☐ Indian tribal governments/enterprises		
	X Otl	her (specify) Household Employer (HCSR)	1	Gr Exemption Number (			
9b		poration, name the state or foreign country (if teb) where incorporated			n country		
10	Reason	n for applying (check only one box)	1	g purpose) ▶			
	☐ Sta	arted new business (specify type) ►	naria		new type) ▶		
			rcha		3		
	Hir	ed employees (Check the box and see	ate	d a trust (specify type)			
	☐ Co	mpliance with IRS withholding regulation	£ 30	d a pension plan (specify type)			
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11	Date bu	usiness started or acquirementh, day, year). Septruction	ns.	12 Closing month of ac	counting year		
					mployment tax liability to be \$1,000 or		
13	Highest	t number of employees ex ted in the months (enter	er -0-	if less in a full calenda	r year <b>and</b> want to file Form 944		
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					ax liability generally will be \$1,000 to pay \$5,000 or less in total wages.)		
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17	Indicate	principal line or merchndise sold, specific construction wor	k do				
					•		
18	Has the	applicant entity shown on line 1 ever applied for and receiv	ed ar	n EIN? Yes No			
		" write previous EIN here ▶		_			
		Complete this section only if you want to authorize the named indivi	dual to	o receive the entity's EIN and answer	questions about the completion of this form.		
Thire	1	Designee's name		,	Designee's telephone number (include area code)		
Part	у	Larry Paladino			(501)604.9936		
Desi	gnee	Address and ZIP code			Designee's fax number (include area code)		
		PO Box 242930, Little Rock, AR 72223			(501) 821.0045		
Under p	penalties of	perjury, I declare that I have examined this application, and to the best of my knowle	edge a	nd belief, it is true, correct, and complete	Applicant's telephone number (include area code)		
		(type or print clearly) ▶					
		AL - William All -			Applicant's fax number (include area code)		
Signat	ture >			Date ►	Applicant a lax number (include area code)		
9-114	A COLUMN TO THE PARTY OF THE PA		_	Date			

# Form 2678 Employer/Payer Appointment of Agent

(Rev. August 2014) Department of the Treasury - Internal Revenue Service

OMB No. 1545-0748

(1101)	., lagact 2014)	ment of the troubury mitor	nai riovonao obrvioc	72		
dep		ts of employment o	proval to have an agent file return or other withholding taxes or if y		For IRS use:	
a			wants to request approval, comp he agent. Have the agent complete			
No fo	<b>ote.</b> This appointm r filing Form 2678 o	ent is not effective un on page 3.	til we approve your request. See the	instructions		
• If	you are an emplo omplete all three p	yer, payer, or agent arts. In this case, onl	who wants to revoke an existing a yone signature is required.	ppointment,		
Pa	art 1: Why you a	are filing this form			1	
(Che	eck one)————		***		A A	
		<b>nt</b> an agent for tax rep e an existing appointn	porting, depositing, and paying. nent.			*
Pa	art 2: Employer	or Payer Information	: Complete this part if you want to	appoint an ag	jen. voke ai	n ap tment.
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2	Employer's or pa (not your trade na					
3	Trade name (if a	iny)				
4	Address		PO E 242930 Number Stree			0.1
						Suite or room number
			City TLE R		AR	7223 ZIP code
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# Form **8821**

(Rev. January 2021)

Department of the Treasury Internal Revenue Service

# **Tax Information Authorization**

▶ Go to www.irs.gov/Form8821 for instructions and the latest information.
 ▶ Don't sign this form unless all applicable lines have been completed.
 ▶ Don't use Form 8821 to request copies of your tax returns or to authorize someone to represent you. See instructions.

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Print Name			Title (if	applicable)

# **APPENDIX 4**

# SAMPLE DIRECT CARE SERVICE WORKER EMPLOYMENT PACKET



PO Box 242930 Little Rock, AR 72223 Toll Free 866.710.0456 Online: PalcoFirst com

# West Virginia Personal Options Employment Packet

Welcome to self-direction and to Palco! This packet contains all the forms you need to enroll as an worker and begin providing services to your participant. Please follow all directions in this packet. You will not be paid for services until all forms are completed, Palco verifies all intermation diminal checks, and clears you for hire, and you are notified that you are ready to provide pervice.

and cica	is you for file, and you are notified that you are ready	to provide ervice.
You	must complete and return:	
	Worker Intake Form	US CIS Form I-9
	Worker Qualification Form	9 Supporting Documentation
	Member/Worker Employment Agreement	of Socie ecurity Card
	Medicaid/Worker Agreement	Payro for ation Worksheet
	Criminal History Check Scheduling Form	IRS Form VV-4
	WV CARES Self Disclosure application & constant	WV Form IT-104
	Request for Variance of Fitness Determine the Form (Optional)	Pay Selection & Direct Deposit Form
Failure to to comple instructio complete  Visit our enrollmer	ete forms, the payment scheme, Pain Notice of	cuments, including information on how Privacy Practices, F.A.Q. and similar not need to be returned to Palco. Send dress below.  45 cofirst.com  nt 0 223  tomer support to get connected to an one receiving an email with your login
Should y represent	ou need any assistance during this process, please tative at 1.866.710.0456 or <a href="mailto:info@palcofirst.com">info@palcofirst.com</a> .	contact a friendly customer support
We look f	forward to serving you!	
	Sincerely,	
	The Palco Tea	am
EN-	WCP-1.0	



# Frequently Asked Questions

Palco serves individuals who participate in the self-directed model by providing various financial, customer support, and informational services. Below are frequently asked questions to help you understand our processes, your requirements, and how to receive assistance.

# How do I complete forms if I am unable to sign?

We encourage you to enroll online, as there are plenty of accessible options of sur website. However, if you are unable to use our online system, you may either sign with an or a mark, then have a witness legibly sign the document on the line above the 'witnessed by'.

# What if I need assistance in completing forms?

Online enrollment is the easiest method for completing forms. Palco custom suppose gents can assist you in gaining credentials to enroll online. Or, if you would prefer, our staff ide in-person assistance with completing forms.

## When can the worker begin providing services?

Palco will notify the employer and the worker once a equirent at some of the enthance been met. The date of this notification is the date work can begin any work erformed for to that date will not be paid by the program.

# Can a worker provide services to multiple ticipal

Yes. However, a worker must abide by all program les, es cially those regarding overlapping claims for payment of services.

What happens if a worker wants

Workers may be employed by as many employers, a new working for a new employer, a new working for a new employer.

However, some required may be want depending on the circumstances, such as providing a new formal for copy of Social Security aros docume ation related to receiving direct deposit. Generally, background checks can all trans of sure to check with your program rules to make sure you understand all the requirem

What hapr is if a worker states providing services?

Anytime a vorker state providing service, Palco must be notified via an Employment Separation Notice, where found in our website. Even after termination, workers should keep Palco aware of any changes in contact is primation throughout the year, so that we can send correspondence, such as W-2s, to the correct a ress.

# How does a participant change an employer of record?

A Designation of Surrogate Employer form must be completed. Be sure to include the date of the change at the top of the form.

# How does an employer of record change impact existing workers?

Workers must re-complete some new hire forms, such as the I-9. Palco will notify you of the requirements. Be sure to complete any required forms so that your pay is not impacted.



# **Notice of Privacy Practices**

Palco may receive and create records concerning your medical and individually identifiable information ("PHI") and is required to maintain the privacy and security of your PHI. Please read this notice carefully. If you have questions or concerns, contact the Palco Privacy Officer at <a href="mailto:privacy@palcofirst.com">privacy@palcofirst.com</a>. Palco will only use and disclose your information as allowed by law and as described below:

- Help manage the health care treatment you receive. We may disclose we information to provide treatment and administer services, including performing assessments, issuing corkers' compensation and administering similar programs, and recommending services in some quations and disclose information to others who implement your health services. We may correspond to you and/or your designated representative (e.g., surrogate employer or authorized user). All employer corresponding performing assessments, issuing corkers' compensation and administering similar programs, and recommending services in some quations and disclose information to others who implement your health services. We may correspond to you and/or your designated representative (e.g., surrogate employer or authorized user). All employer or respondence may not be encrypted, nor secure.
- Run our business, including payment for and administration of your health servers. We may use and disclose your information to receive and issue payment on you behalf and bill Medicaid, Medicare, Managed Care Organizations, the Veterans Administration being as received by your program.
- Comply with federal and state law, including investigation by the Unit States Department of Health and Human Services (U.S. DHHS) and law inforcemes and issues involved national ecurity. Palco may be required to disclose your information to coroners and other officials at you.
- Respond to legal actions and health overs such swsuits or quality assurance reviews. Palco may be required to respond to requests, it is a discovery, subpoenas, audits, and other legal or regulatory matters.

#### You have the right to:

- Authorize the use and disclosure.

  PHI r reasons not authorized by federal or state law.

  Palco will seek your approval to disclosure.
- Receive this notice of privacy practice. You can request a copy of this notice or view the posting at palcofirst.com, in enrolling processes, and program manuals, as applicable. Palco can change the terms of this notice at any time. The privacy of the U.S. DHHS.
- Review and receive copic of ur records and a list of disclosures. Requests must be on a Request for Sensitive als. We way argue a reasonable cost-based fee for collection of the records, including postage and labor. Palco management of required by law.
- Request mending a contraction.
   We will provide with a property of summary or a rejection within 15 days of receiving your request.
   Request information in alternate format or restrict access on your records. Requests must be in
- Request information in alternate format or restrict access on your records. Requests must be in
  writing on a Request for additional Privacy. We will provide you with a copy or summary within 15 days of
  receiving your request. We may reject or terminate the request in certain limited cases and will notify you of
  rejections and terminations.
- Be notified in case of a breach of your sensitive information. You will be notified within 60 days by the Privacy Officer.
- Choose someone to act on your behalf with regard to your records. You must complete the appropriate
  forms and information to designate Authorized Users in order for those individuals to communicate with
  Palco on your behalf.



# Can someone correspond with Palco on my behalf?

Federal and state privacy laws prevent Palco from disclosing personal information to unauthorized individuals. Palco will only correspond with workers about that worker's particular account. Surrogate employers may receive all information about the worker's accounts and information about the participant necessary to carry out employer roles. Participants have unlimited access to information held by Palco on their account. Participants may appoint an authorized user by completing an Authorized User Designation form.

## What if a worker doesn't receive the funds on the scheduled payday?

For direct deposited payments, please allow sufficient time for the pay to desist into your account. We recommend allowing 24 hours after payday for the deposit

## Will the worker receive a W-2 at year-end?

W-2s are available January 31. If receiving the W-2 by mail, please allow on reek freelivery. All attendants receive a W-2. Workers who earn less than the annual domestic service and mold, per IRS Pub. 15 (Circular E), will also receive a refund of over collected. A. The employer could encourage their workers to make sure that the correct address and direct deposit information is current with Palco prior to this date, even if the worker is no longer working

## How do I change my information with Palco?

The fastest and easiest method is to log into your count of change your information. Otherwise, you must complete the appropriate form of many ax it to Palco. All forms are found at palcofirst.com. For name and contact inform and attach documentation to show proof of national palcofirst.com, by can be driver's license, divorce degree or marriage license. For withholding changes, complete a Dect Losit Authorization. For any other changes, contact Palco customer support.

#### How can Palco be contacted?

Palco Customer Support and available Monday through Friday, 8:00 a.m. to 5:00 p.m. CST, except state holic vs. The part of the CST, except state holic vs. Pay re ch us by phone at 501.604.9936 or toll free at 1.866.710.0456, email to tom publicolar to palcofirst.com, fax to 501.821.0045 or mail to P.O. Box 242930, Little Rock AR 722. Lico has a range of translator and interpreter services at your request.

Page 2 of 2 \_FAQ-1.0



# **PALCO PAYMENT SCHEDULE - 2023**

# **West Virginia Personal Options Program**

#### Service Period

#### MONDAY SUNDAY **Start Date End Date** January 2, 2023 January 15, 2023 January 16, 2023 January 29, 2023 February 12, 2023 January 30, 2023 February 13, 2023 February 26, 2023 February 27, 2023 March 12, 2023 March 13, 2023 March 26, 2023 March 27, 2023 April 9, 2023 April 10, 2023 April 23, 2023 April 24, 2023 May 7, 2023 May 8, 2023 May 21, 2023 May 22, 2023 June 4, 2023 June 5, 2023 June 18, 2 June 19, 2023 July 2, 202 July 3, 2023 July 16, 2023 July 17, 2023 30, 2023 July 31, 2023 2023 August 14, 2023 Aug August 28, 202 Septembe September 11, 2 ntember 2 September 25, 20 8 2023 ctober \_\_\_ 2023 October 9, 2023 3, 2023 November 5, 2023 ovember 6, 2023 November 19, 2023 ovember December 3, 2023 4, 202 December 17, 2023 December 18, 202 December 31, 2023

**Timesheets** Due by 12 am

# TUESDAY **Deadline** January 17, 2023 January 31, 2023 February 14, 2023 February 28, 2023 March 14, 2023 March 2023 ~ril 11. April 5, 202 May 2023 Ma 3, 2023 ne 6, 2023 une 20, 2023 5, 2023\* Jun 8, 2023 August 1, 2023 August 15, 2023 August 29, 2023 September 12, 2023 September 26, 2023 October 10, 2023 October 24, 2023 November 7, 2023 November 21, 2023 December 5, 2023 December 19, 2023

January 2, 2024

**Payments** Made by Palco by 5pm

RIDAY Paid On January 2023 Febry 10, 2023 Jary 24, 202 rch 10, 2 Ma. 2 ,023 April , 2023 🚉 21, 2023 May 5, 2023 May 19, 2023 June 2, 2023 June 16, 2023 June 30, 2023 July 14, 2023 July 28, 2023 August 11, 2023 August 25, 2023 September 8, 2023 September 22, 2023 October 6, 2023 October 20, 2023 November 3, 2023 November 17, 2023 December 1, 2023 December 15, 2023 December 29, 2023

January 12, 2024

time submissions and mistakes may result in late payment!

#### 2023 Office Closures

New Year's Day - Monday, January 2\* Martin Luther King, Jr Day - Monday, January 16 Columbus Day - Monday, October 9 President's Day - Monday, February 20 Memorial Day - Monday, May 29\* Juneteenth Day - Monday, June 19 Independence Day - Tuesday, July 4\*

Labor Day - Monday, September 4\* Veterans Day - Friday, November 10 Thanksgiving - Thursday-Friday, November 23-24\* Christmas - Monday, December 25\*

\* Palco Office Closures



PO Box 242930 Little Rock, AR 72223 Toll Free 866.710.0456

Online: PalcoFirst.com

# **Worker/Applicant Intake**

Complete this form entirely to begin the enrollment process as a worker in the West Virginia Personal Options Program. Completion of this form does not constitute a hiring by the employer.

MEMBER INFORMATION					
Full Name	SSN		Program		
		INFORMATIO			
First Name	Middle N	ame	Last Na		
Social Security Number Ema	ail 	Date of Birth	(mm/dd/yyyy)		
Is the worker related to the memb	per by blood or marriag	e?			
□No □Yes. I am the memb			(specify relationship)		
Do you share a residence with the	e member? □No □	Yes.			
Please specify who owns or rents	s the residence:	is the wo	r at leas ears of age? ☐ No ☐	Yes	
Physical Address (Street Address	s, Including Apt. #)				
City	State	Zip	County		
Mailing Address (Street Address,	Including Apt. #) – /	ffe. than	physical address		
City	Sta	Zip	County		
Phone1	Phone2	Preferred M	Method of Communication  ☐ Mail ☐ Phone / Voicemail		
How would you like to con	ue rollme, p	rocess?		-	
electron ally. Such correspondent	alco is not response orker agrees to response may contain Fable along the matter of th	nsible for providi eceive information Personal Health worker accepts Inderstands that	has provided an email address that belo ling information to an incorrect email ad ion, notifications, and other correspond Information, as defined at 45 CFR 160 all risks associated with the transmiss at his or her consent is in effect until Pa	ddress dence 0.103, sion of	
Receive a pacific via ail					
☐ Receive a paper packet via	ı mail.				
Worker Printed Name		Member/Repres	sentative/Employer Printed Name		
Worker Signature	Date	Member/Repres	sentative/Employer Signature Date	•	

Please return this form to Palco via email: enrollment@palcofirst.com
or via fax to 1.877.859.8757.



# **Worker Information & Qualification**

This form is required for all workers in the West Virginia Personal Options Program. Please complete this form entirely.

	WORKER INFORMATION	
Full Name	4 of SSN	

As a worker in West Virginia Personal Options Program, you must agree to the wing terms

- You understand who your employer is. Please note in the West Virginia Pennal ptions Program, the employer is the member or their Authorized Representative. Neither Palco, nor Vest Virgin Personal Options Program, or program/state administrators, are your employer.
- This position is paid as an employee and not as an independence contractor.
- This document does not create an anticipation, nor a contract, opployment.
- To adhere to all federal, state, local, and program laws, restions, pricies, and resirements throughout your employment, including staying current on information provided to about the program.
- That employment is contingent upon many factor including uccessive pletion and/or passing of required background checks, possible training, a for creder ling.
- To report any changes in your ability to deliver serves, including changes in your background history or qualifications required to perform services the this plant.
- Your employer is responsible for payment vices activities not authorized in or exceeding the limitations established by the budget.
- Funds to pay for services are from public sources, as financial accountability and liability applies to the use of the funds. You understate the public sources of the funds. You understate the public sources of the funds of
- That medical and person information a lata about the member and the worker is confidential. You have read and agree to Pales of Practice.
- That neither Palco nor pagram/s dministrators are responsible or liable for any negligent acts, work-related injuries, or omis ons me, employer, member, other workers or service providers, or authorized representative.
- To report a critical incident elating to the member's health, safety, and welfare, including suspicion of fraud, use, or neglect.
- You c ify that lea 18 years of age.
- You git permissic for Palco to run the below listed checks and to share the results with your employer, state and presam administrators, and others who may be involved in the consumer's care through this program of understand that employment is based on the outcome of these checks and that you cannot proceed ervices, nor receive payment, until Palco has notified you that you have been cleared to do so. You hereby release your member/Authorized Representative, Palco, West Virginia Personal Options Program and his/her agents from any and all liability, claims and/or demands, of whatever kind, related to the compilation or preparation of the checks hereby authorized.

$\boxtimes$	Office of Inspector General Medicaid exclusion check
	SAM Check
$\boxtimes$	WV Medicaid Check



By signing below, you acknowledge that you have read this agreement and accept responsibility as a worker in the West Virginia Personal Options program, understand their responsibilities and duties associated with that role, and will comply with program policies and requirements. The information provided herein is true and accurate to the best of your knowledge. You further understand and agree that violation of this agreement may result in inability to provide services under this program.





# West Virginia Personal Options Criminal Background Check (CBC) Scheduling Form

□ ADW □ IDD	□ ТВІ			
Palco will schedule the initial apbelow. You will not be able to	opointment on your l work until Palco rece	pehalf through WV CARES. Planse fill out the form vives your fitness determined in notification.		
Applicant/Employee Name:		Has the applicant of pleted a through WV CARES within the last very of the No		
Member Name:		Resource Consultant Na		
What Date and Time are you a  How do you want to be notifie		erprint appearance than 1 option:		
☐ Phone	☐ Mailing Add			
Please submit 2 money orders or certified che s vour plication:  ■ \$34.50 made payable to Palco:  ■ Money order or tified che k Number #  ■ \$20 made payable to WV Car  ■ Money order or tified che k Number #  Should you need any assistance due his process, please contact a friendly customer support representative at				
1.866.710.0456 or info@palcon	om.			
	For Intern	al Use Only:		
Appointment Date	Appointment Time:	Date of Notification of Appointment:		
Location:		<b>'</b>		
Notes:				

EN-\_\_\_\_-WCP-1.0



West Virginia Clearance for Access: Registry and Employment Screening

#### SELF-DISCLOSURE APPLICATION AND CONSENT FORM

(This application must be completed in blue ink)

#### **PART I**

I, the below-named applicant, understand that this form cannot be completed until an offer of employment is made. The offer of employment is made pending the results of the investigation of registries and a fingerprint-based background check. I understand that refusal to complete Parts I, II, and III of this form constitutes my rejection of the employment offer.

I, the below-named applicant, swear/affirm, that the information contain vithin the application is true
and correct to the best of my knowledge.
Applicant Last Name: First Name: MI: Gene MI: Gene Jr., II):
Clearly answer truthfully YES or NO to the following questions:
Yes No
1. Are you addicted to alcohol, a controlled substance of drug or eyou as all ul user thereof?
2. Have you ever been convicted of, pled guilty or note ntend (no contest) to a misdemeanor or felony?
3. Have you ever been convicted of an act of video involve a deadly weapon or an act of domestic violence?
4. Are you under indictment or do you have any chain arges pending against you?
5. Are you currently serving a sentence of contract parole, probation or other court ordered supervision?
6. Are you the subject of sining order result of a domestic violence act or subject to a verified petition of do stic ace or such to a protective order?
NOTE: If any ns 1-6 list above are answered YES, a brief letter of explanation by the applicant
must accord any this form. Fare to provide explanations could result in disqualification.  PART II
Consent for Investigation Employment Purposes
I hereby authorize partment of Health and Human Resources (DHHR) to conduct an investigation
including, but not limited to, registry and fingerprint-based background checks, into information contained in
this application. I understand that my fingerprints will be retained by the West Virginia State Police for the
purpose of Rap Back services during my employment in a long-term care facility. Furthermore, I understand
that the falsification of any information contained within this application constitutes false swearing and is
an excluding act under the fitness determination process being conducted by DHHR.
Signature of Applicant: Date: Date:



West Virginia Clearance for Access: Registry and Employment Screening

# SELF DISCLOSURE APPLICATION AND CONSENT FORM

(This application must be completed in blue ink)

PART III Applicant Last Name:	First Name:	MI: Generation (ex. Jr., II):		
		State of Issue:Ppe of ID:		
		ight:ftir Weight:lbs.		
Hair Color: □Brown □Black	□Blonde □Bald Eye Color: □Gray □Other □White			
Social Security Number:	<del>-</del>			
Date of Birth://	Place of Birth (City & State):	Citi ship:		
Current Mailing Address:		County:		
Current Physical Address:		County:		
List all cities and states (outside of WV) where you have have have have have have have have				
	ta oth r name used or known as):	formally (Include maiden names, married		
***This	form expires 60 days after the date o	of the signature in Part II***		
For Office Use Only:				
I affirm that I have com	pared the government issued identifica	ation presented by the applicant.		
Signature:(Signatu	re must be completed in blue ink)	Date:		
Printed Name:		Position:		



West Virginia Clearance for Access: Registry and Employment Screening

# REQUEST FOR VARIANCE OF FITNESS DETERMINATION – Applicant Request

Date:
Applicant Name:
Address:
City, State, Zip:
Application Number:
PART I
Pursuant to the WV CARES Act and W.Va. S. §69-10- t seq., I request a variance of my
eligibility determination. This variance is reques base on the following mitigating
circumstances (check all that apply):
□ Passage of time
☐ Extenuating circumstance has the apricant ge at the time of conviction, substance abuse, or mental her issues to be a substance abuse.
☐ Demonstration of rehabilitation has character references, employment history, and
training
☐ Relevancy of the rticular rticular rticular respect to the type of
employment sought
□ f er – Please expla



West Virginia Clearance for Access: Registry and Employment Screening

PART II
Please provide an explanation for this variance request:
Please attach additional documentation relevant to variance request review and submit, alo
with this form, by email to w. gov. f you we any questions or require additional
information, please contact our care are 30 3 8-2278.
I understand that, results the W. ARES Act and W.Va. St. R. §69-10-1 et seq., I may be provisionally imploy to more than 60 days pending the review of this
variance request. Fu her re, I werstand that I shall receive direct onsite supervision
while the sance requisition is being reviewed.
Sig ture: Date:



West Virginia Clearance for Access: Registry and Employment Screening

REQUEST FOR VARIANCE OF FITNESS DETERMINATION – Applicant Request

Date:
Applicant Name:
Address:
City, State, Zip:
Application Number:
PART I
Pursuant to the WV CARES Act and W.Va. St. P. 2-10-1 4., I request a variance of my eligibility
determination. This variance is requested based on a bellowing pitigating circumstances (check all that apply)
□ Passage of time
☐ Extenuating circumstances such as to properly the time of conviction, substance abuse, or mental health issues
☐ Demonstration of rehabitation such as character references, employment history, and training
☐ Relevancy of the particular disquering offen (s) with respect to the type of employment sought
□ Other – Please explain:



West Virginia Clearance for Access: Registry and Employment Screening

PART II		
Please provide an ex	eplanation for this variance request:	
Please attach additional docu	The state of the s	у
email to <u>varianceswycares@v</u> our office at (304) 558-2018.	vov. It we any questions or require additional information, please contact	
Please note Y CARES is I	y both State and Federal law and security policies related to the	
information e can		
released or d. a with e	r the applicant or the facility.	
provisionally employed for i	to the WV CARES Act and W.Va. St. R. §69-10-1 et seq., I may be no more than 60 days pending the review of this variance request. that I shall receive direct onsite supervision while the variance request is being	
Signature:	Date:	



# **Instructions for I-9**

The United States Department of Homeland Security, Citizenship and Immigration Services (CIS) department, requires all U.S. employers and workers to complete the I-9. The purpose is to verify that the applicant worker can be legally employed in the United States. Palco verifies all workers through the U.S. CIS online system.

Use the instructions and checklist below to guide you through complete and this form. The applicant\_worker\_should\_complete\_all\_fields\_highlighted in blue \_\_e\_emple\_er should complete all fields highlighted in vellow.

# 1. Complete page 1. Must be completed by the applicant worker.

□ Complete all fields in Section 1. The name here must match the navour verification documents. (See #3 on this checklist)

Section 1. Employed than the first day of emp				1,00	uit. sign	Section 1 c	m I-9 no later
Last Name (Family Name)	(F	est Name (G	iven Nam		DIFF	Lar	Used (if any)
Address (Street Number and	( Name)		TIME STORY	Town		State	ZIP Coda
Date of Birth (mm/dd/yyyy)	U.S. Sc 2 Secur	- Nun	Employee's	riddress		Employee's	Telephone (ilumber)

- ☐ Select the following box that applies to bu
  - If you select
     supply your all registration or USCIS number.
  - If you select book so, you work expiration date and complete any one of the three fields the sllow.

I attest, under p kury, that I am (c) ne of the following boxes): 1. A citizen of the ted State 2. A noncitizen nat of the Uni uctions) 3. A lawful permaner lien Registration Number/USCIS Number): en authorized until (expiration date, if applicable, mm/dd. Some aliens may write in the expiration date field. (See instr QR Code - Section 1 Do Not Write in This Spa Aliens autho ride only one of the following S Number OR For egistration 2. Form I-94 Admis rt Numi Country of Issuance: Sign and date. Signature of Employee Today's Date (mm/dd/yyyy) ☐ If necessary, complete the Preparer and/or Translator Certification boxes at the bottom

of page 1.



2. C	omplete page 2. Must be completed by the <u>employer</u> .
	Enter the worker's name and citizenship status as it appears on page 1.    Employee Info from Section 1   Last Name (Family Name)   First Name (Given Name)   M.I.   Citizenship/Immigration Status   Citizenship/Immigration   Citizenship/Immigr
	Refer to page 3 of the I-9 for appropriate verification documents. Complete all lines associated with the documents provided in the space designated. You must complete one, but not both, of the following two options for submission:
	<ul> <li>☐ One document from List A.</li> <li>☐ One document from List B and One document from List C.</li> </ul>
	List A OR List B Identity and Employment Authorization  Document Title  Issuing Authority  Document Number  Expiration Date (if any add/yyyy)  Expiration Date (if any add/yyyy)  Expiration Date (if any)  Date (if any)(mm/dd/yyyy)
	Attach copies of the verification documents light of on page 2 of the I-9. The employer must review the worker's verification documents.
	Provide the employee's first day or aployn t in the space provided. This date must match the date the worker signer on the space provided. This date must match the date the worker signer on the space provided.
	The employee's factor of emplo
	Complete the next three is of including ation in Section 2, including signing and dating the form.
	Signature of Employer or Authorized Representative Today's Die in Add/yy, Title of Employer or Authorized Representative  Last Name of Employer or Differentiative Firs Name Companyation Name  Last Name of Employer or Differentiative Firs Name Companyation Name  Last Name of Employer or Differentiative Firs Name Companyation Name  Last Name of Employer or Differentiative Firs Name Companyation Name  Last Name of Employer or Differentiative Firs Name Companyation Name  Last Name of Employer or Differentiative Firs Name Companyation Name  Last Name of Employer or Differentiative Firs Name Companyation Name  Last Name of Employer or Differentiative Firs Name Companyation Name  Last Name of Employer or Differentiative Firs Name Companyation Name  Last Name of Employer or Differentiative Firs Name Companyation Name  Last Name of Employer or Differentiative Firs Name Companyation Name  Last Name Of Employer or Differentiative Firs Name Companyation Name  Last Name Of Employer or Differentiative Firs Name Companyation Name  Last Name Of Employer or Differentiative Firs Name Companyation Name  Last Name Of Employer or Differentiative Firs Name Companyation Name  Last Name Of Employer or Differentiative Firs Name Companyation Name  Last Name Of Employer or Differentiative Firs Name Companyation Name  Last Name Of Employer or Differentiative Firs Name Companyation Name  Last Name Of Employer or Differentiative First Name Companyation Name Companyation Name  Last Name Of Employer or Differentiative First Name Companyation Name  Last Name Of Employer Of Employer or Differentiative First Name Companyation Name  Last Name Of Employer Of
4	
	Employer's Business or Org atio Advess (Street Lumber and Name) City or Town State ZIP Code
	the worker eviously worked for the employer within the last three years. If none of the property of the section 3 blank.
	Sign, date, and print the employer's name at the bottom of the page.
	Signature of Employer or Authorized Representative  Today's Date (mm/dd/yyyy)  Name of Employer or Authorized Representative
For 1	more information and assistance on how to complete this form, visit

Page 2 of 2 EN-000000-II9-1.0

https://www.uscis.gov/i-9.



# **Employment Eligibility Verification**

#### **Department of Homeland Security**

U.S. Citizenship and Immigration Services

## USCIS Form I-9

OMB No. 1615-0047 Expires 10/31/2022

▶START HERE: Read instructions carefully before completing this form. The instructions must be available, either in paper or electronically, during completion of this form. Employers are liable for errors in the completion of this form.

ANTI-DISCRIMINATION NOTICE: It is illegal to discriminate against work-authorized individuals. Employers CANNOT specify which document(s) an employee may present to establish employment authorization and identity. The refusal to hire or continue to employ an individual because the documentation presented has a future expiration date may also constitute illegal discrimination.

Section 1. Employee Information than the first day of employment, but it			st complete and	d sign Sec	tion 1 c	f Form I-9 no later
Last Name (Family Name)	First Name (Given Nam	e)	Middle Initial	Othe	t Name	s Used (if any)
Address (Street Number and Name)	Apt. Number	City or Town			State	ZIP Code
Date of Birth (mm/dd/yyyy)  U.S. Social S	Security Number Emplo	yee's E-mail Add	ress		loyee's	Teler e Number
I am aware that federal law provides f connection with the completion of thi	s form.		e s ents o	r use of fa	alse do	cuments in
I attest, under penalty of perjury, that	am (check one of the	folio: J box	8 10			
1. A citizen of the United States	4					
2. A noncitizen national of the United Sta	ites (See instructions)			· · ·		
3. A lawful permanent resident (Alien F	Registration Numb	Numu				
4. An alien authorized to work until (ex	piration date, if appli	n/dd/yyyy				
Some aliens may write "N/A" in the ex		75)				
Aliens authorized to work must provide only one of the following doc ent recomplete Form I-9:  An Alien Registration Number/USCIS Number (194 Admiss) Number Foreign Passport Number.						
1. Alien Registration Number/USCIS Number: OR						
2. Form I-94 Admission Number:  OR						
3. Foreign Passport Number:						
Country of Issuance:			_			
Signature of Em			Today's Date	(mm/dd/yy	ryy)	
Preparer   d/or T   did not use   or translato   A preparer(s) and/or translator(s) assisted the employee in completing Section 1.						
(Fields below must be completed signed when preparers and/or translators assist an employee in completing Section 1.)  I attest, under penal signed when preparers and/or translators assist an employee in completing Section 1.)						
knowledge the information is true and	correct					
Signature of Preparer or Translator				Today's Dat	te (mm/c	ld/yyyy)
Last Name (Family Name)		First Name	(Given Name)			
Address (Street Number and Name)		City or Town		S	State	ZIP Code
						I.



Employer Completes Next Page





# Employment Eligibility Verification

# Department of Homeland Security

U.S. Citizenship and Immigration Services

## USCIS Form I-9

OMB No. 1615-0047 Expires 10/31/2022

Section 2. Employer or Auth (Employers or their authorized representa must physically examine one document fr of Acceptable Documents.")	tive must co.	mplete and si	ian Sectio	n 2 within 3	business of	days of the e	employee's fo	irst day of employment. You List C as listed on the "Lists
Employee Info from Section 1	Name (Famil	y Name)		First Nam	<mark>e</mark> (Given Na	ame)	M.I. Citi	zenship/Immigration Status
List A Identity and Employment Authorizat	OR		List			AND	- Em	List C
Document Title	D	ocument Title				Docum		
Issuing Authority	Is	suing Authori	ity			Issuir	uthority	
Document Number	D	ocument Nun	nber			Doo	nt Numi	
Expiration Date (if any)(mm/dd/yyyy)	E	xpiration Date	e (if any)(i	mm/dd/yyyy	)	Expirati	on (if a	any)(mm/ yyy)
Document Title					Transit I		-	
Issuing Authority		Additional In	nformatio	on				R Code - Sections 2 & 3 o Not Write In This Space
Document Number			- 4		1			
Expiration Date (if any)(mm/dd/yyyy)		2						
Document Title				W/				
Issuing Authority								
Document Number			11					
Expiration Date (if any)(mm/dd/yyyy)				-				
Certification: I attest, under penetry of perjury, that have examined the document(s) presented by the above-named employee, (2) the above-listed document(s) to be genuine to be genuine to relate to the employee named, and (3) to the best of my knowledge the employee is authorized to work he characteristics.  The employee's first day of emp								
Signature of Employer or Authorized Re	e dve	То	day's Dat	te (mm/dd/y		<mark>le of Employ</mark> Household En		rized Representative
Last Name of E over or Authorized Represe	Fir	st Name of Em	ployer or A	Authorized Re	epresentative	Employ	er's Busines	s or Organization Name
Employer's Bu	ess (Street I	Number and I	Name)	City or Tov	<mark>vn</mark>		State	ZIP Code
	Rehires (T	o be comple	eted and	signed by	employer	or authoriz	ed represe	entative.)
A. New Name (if applicable)	F: (N	(0: 1/		1			f Rehire (if a	pplicable)
Last Name (Family Name)	FIRST Nam	e (Given Nan	ne) 	Mid	dle Initial	Date (mn	n/dd/yyyy)	
C. If the employee's previous grant of emp continuing employment authorization in the	loyment auth	norization has	expired,	provide the	information	for the doc	ument or red	ceipt that establishes
Document Title			Docume	nt Number			Expiration	Date (if any) (mm/dd/yyyy)
I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented document(s), the document(s) I have examined appear to be genuine and to relate to the individual.								
Signature of Employer or Authorized Repr	esentative	Today's Da	ite (mm/d	d/yyyy)	Name of E	mployer or A	Authorized F	Representative

# LISTS OF ACCEPTABLE DOCUMENTS All documents must be UNEXPIRED

Employees may present one selection from List A or a combination of one selection from List B and one selection from List C.

	LIST A  Documents that Establish  Both Identity and  Employment Authorization	LIST B  Documents that Establish Identity  R	LIST C  Documents that Establish Employment Authorization ND
3.		-	1. A cial Security Account Number and unless to card includes one of the following strictions:  107 LID FOR EM OYMENT  (2) PFOR WOT ONLY WITH  INS THORY TON
6.	not yet expired and the proposed employment not in conflict with any restricts or limitations identified on the proposed employment not in conflict with any restricts or limitations identified on the proposed for the proposed in the form I-sample of the Mark III Islands (Form I-sample of Form I-sample of Form I-sample of Form I-sample of Form I-sample of Free Association where the United States and the Form I-sample or RMI	ie to present a document listed above:  10. School record or report card  11. Clinic, doctor, or hospital record  12. Day-care or nursery school record	7. Employment authorization document issued by the Department of Homeland Security

Examples of many of these documents appear in Part 13 of the Handbook for Employers (M-274).

Refer to the instructions for more information about acceptable receipts.



# **Instructions for Worker Payroll Forms**

Please complete the appropriate IRS, state withholding, and additional forms in order to become a worker in the West Virginia Personal Options Program. Follow the instructions listed below. All areas highlighted must be signed.

•	The orde	Payroll Information Worksheet is used to determine any exemples on you qualify for in for Palco to calculate the proper payroll and payroll tax for your and your imployer.
		Complete all fields in the Required Information section. Select the reason for completing the form. Complete Part A.
		✓ Please select the option that most closely plates to your relation.  Complete Part B.
		✓ Please select the option that most classic relation to the living arrangement. Sign and date the bottom of the form.
•	from	RS Form W-4 is used by Palco to schold the loper amount of federal income tax your paycheck. Complete Steps 1-4, en and date the bottom of the form. ional instructions are included to ge two mis form.
•	The corre	State of West Virginia Withhold 19 rempt. Certificate (IT-104) tells Palco the ct amount of state income tax to will hold 19 m your paycheck.
		Complete the first section with the rest me, full address, and your Social Security Number.
		Include the complete of a sendent's you would like to claim in Section II.  Complete number of a sendent's you would like to claim in Section II.  Sign and date he bot the form.
•	tra If y	ction a pirect Deposit Authorization Agreement is used to inform Palco paid and gives Palco the authority to pay you via electronic funds fer. Pleasure of the two choices (Direct Deposit or Money Network Services).  ct Deposit option, please follow the instructions on the form. If you make the problem of the two choices option, Palco will enroll you with our partners.

at First Data Mon Network Services.



PO Box 242930 Little Rock, AR 72223 Toll Free 866.710.0456

Online: PalcoFirst.com

# **Payroll Information Worksheet**

As a home care worker in self-direction, your payroll tax withholdings are subject to special tax rules, and your residency may impact your benefits under labor laws. Completing this form accurately will ensure that your taxes and benefits are calculated properly.

REQUIRED	INFORMATION	
Employee Name	ID	
Employer Name	Participant Name (	If discent from ployer)
Select the following box that applies:		
☐ This form is part of your <b>first-time en</b>	rollment with	
☐ You are already enrolled with Palco a	nd negange	ur informaon
Part A: Family Member Exemptions		
Depending on your relationship to your encertain taxes, such as FICA (Social Section 1)		e, you may be exempt from
and SUTA (State Unemployment). You		ITA (Federal Unemployment) about this in IRS Publication
15.	d mo. Hormation	about this in IRS Publication
Relationship to Employ	Fix 1	FUTA <sup>2</sup>
Child employed by Parent	ntil chaid turns 21	Exempt until child turns 21
Parent employed by Adult Child		<u>_</u>
(including Adoptive and or Stepparent)	xempt	Exempt
Otepparent)		
Spouse employed by house	Evernt	Evennt
Spouse employed by house	Exempt	Exempt
	Exempt	Exempt
Select the opriate conse:	·	Exempt
Select the opriate conse:   N Exempt. None the selections a	ipply.	Exempt
Select the opriate conse:	ipply. yer.	Exempt

<sup>&</sup>lt;sup>1</sup> If you are not exempt as indicated above, appropriate taxes, including FICA, will be withheld. Should you not meet the annual IRS domestic service wage threshold for the current tax year, your FICA will be refunded to you in January of the following year, and your W-2 will reflect that no FICA was withheld.

<sup>&</sup>lt;sup>2</sup> In most states, an exemption from FUTA will also apply to SUTA.



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#### Part B: Overtime Payments

There are several factors that may qualify you as being exempt from overtime payments or ineligible for overtime based on program specific rules. Please check the box that applies below:

- Exempt from overtime pay for any reason, including program rules or that I meet the DOL Home Care Rule Exclusion qualifications, which means that I am a live-in caregiver or I reside at the participant's residence at least 5 days per week. (See CFR §552.102 and DOL Fact Sheet #79B). By checking this box, I understand that, if y employer or the program allows me to work more than 40 hours per week, any hour fat I do work over 40 in a work week, will NOT be paid at overtime rates.
- Non-Exempt. I do not qualify for any exemptions and understand to will a paid over ime rates for time worked beyond 40 in a work week.

If any of the information in this document changes at a time, please complete a new document and submit it to Palco immediately. Failure noting also may result in a tax bill to you or other employment-related matters from our encloyer. The information in the incorrectly calculating or withholding pay due your faire to calculating or withholding pay due your faire to calculate and submit a new Payroll Information Worksheet. By signing plow, you certify that the information in this document is correct and understand that you have the purden to notify Palco immediately of any changes in this information, and you have harmless for any incorrect information supplied herein.

Employee Printed Name			
E-malana O'mat	6/12	Dete	
Employee Signature		Date	

Please turn this Part via email to enrollment@palcofirst.com or via fax to 501-821-0045.

#### Form **W-4**

Department of the Treasury

Internal Revenue Service

**Employee's Withholding Certificate** 

Complete Form W-4 so that your employer can withhold the correct federal income tax from your pay.

Give Form W-4 to your employer.

Your withholding is subject to review by the IRS.

OMB No. 1545-0074

2023

Step 1:	(a) First name and middle initial	Last name		(b) Social security number
Enter Personal Information	Address			Does your name match the name on your social security card? If not, to ensure you get
	City or town, state, and ZIP code			credit for your earnings, contact SSA at 800-772-1213 or go to www.ssa.gov.
	(c) Single or Married filing separately			
	Married filing jointly or Qualifying surviving s			K
	Head of household (Check only if you're unmarr	led and pay more than half the costs	s of keeping up a hory	ourself and a qualifying individual.
	eps 2-4 ONLY if they apply to you; otherwis on from withholding, other details, and privac		2 for mo normati	on each step, who can
Step 2:	Complete this step if you (1) hold more also works. The correct amount of with	e than one job at a time, or (	-	pintly and v spouse
Multiple Job		mording depends on moon	e earned from	hese job
or Spouse Works	Do <b>only one</b> of the following.			
WOIKS	(a) Reserved for future use.	31		
	(b) Use the Multiple Jobs Worksheet of			
	(c) If there are only two jobs total, you option is generally more accurate t higher paying job. Otherwise, (b) is	han (b) if at the ar pa		for the other job. This in half of the pay at the
	TIP: If you have self-employment inco	me, s. age 2.		
	ps 3-4(b) on Form W-4 for only ONE of that if you complete Steps 3-4(b) on the For	for the hast paying		bs. (Your withholding will
Step 3:	If your total income will be \$200,000 o	ss 70,000 o. s if ma	arried filing jointly):	
Claim	Multiply the number of qualifying ch	The state of the s		
Dependent and Other		nden by \$50	. \$	-:
Credits			ents. You may add to	
Step 4 (optional):	(a) Other of from job expect to year o't have to	f you want tax withheld to noting, enter the amount	for other income you of other income here	u ).
Other	This may lude into dende	s, and retirement income .		4(a) \$
Adjustments	expect to claim	deductions other than the stee the Deductions Workshee	tandard deduction and	<u> </u>
	the result here	the Deductions Workshipe	t on page 3 and ente	4(b) \$
4				1,07 0
	a wn pldir . Enter any additi	onal tax you want withheld e	each <b>pay period</b>	4(c) \$
Step 5: Sign	Under priury, I declare that this certifi	cate, to the best of my knowled	dge and belief, is true, c	orrect, and complete.
Here	Employee's signature (This form is not vali	d unless you sign it.)	Da	nte
Employers	Employer's name and address		First date of	Employer identification
Only				number (EIN)

Form W-4 (2023)

#### General Instructions

Section references are to the Internal Revenue Code.

#### **Future Developments**

For the latest information about developments related to Form W-4, such as legislation enacted after it was published, go to www.irs.gov/FormW4.

#### **Purpose of Form**

Complete Form W-4 so that your employer can withhold the correct federal income tax from your pay. If too little is withheld, you will generally owe tax when you file your tax return and may owe a penalty. If too much is withheld, you will generally be due a refund. Complete a new Form W-4—when changes to your personal or financial situation would change the entries on the form. For more information on withholding and when you must furnish a new Form W-4, see Pub. 505, Tax Withholding and Estimated Tax.

Exemption from withholding. You may claim exemption from withholding for 2023 if you meet both of the following conditions: you had no federal income tax liability in 2022 and you expect to have no federal income tax liability in 2023. You had no federal income tax liability in 2022 if (1) your total tax on line 24 on your 2022 Form 1040 or 1040-SR is zero (or less than the sum of lines 27, 28, and 29), or (2) you were not required to file a return because your income was below the filing threshold for your correct filing status. If you claim exemption, you will have no income tax withhold from your paycheck and may owe taxes and penalties you file your 2023 tax return. To claim exemption from withholding, certify that you meet both of the conditions above by writing "Exempt" on Form W-4 in the space be Step 4(c). Then, complete Steps 1(a), 1(b), and 5. Do not complete any other steps. You will need to it a new Form W-4 by February 15, 2024.

Your privacy. If you have concerns with Step you choose Step 2(b); if you have concerns with Step (a), you may enter an additional amount want withheld pay period in Step 4(c).

Self-employment. Generally, you will ow. ncome self-employment taxes on any se mploy 3 you receive separate from the wages re e as an employee. If you > pay incon self-employment taxes through rolang from your ges, you should enter the self iployment income or. ep 4(a). Then compute you elf-emplo that tax by the number of p the ear, and include period that resulting on Step 4(c). You can er pay per also add half of the annual amou of self-employment tax to Step 4(b) as a deduction. To ca late self-employment tax, you generally multiply inployment income by 14.13% (this rate is a 4 way to figure your selfemployment tax and equals the sum of the 12.4% social security tax and the 2.9% Medicare tax multiplied by 0.9235). See Pub. 505 for more information, especially if the sum of self-employment income multiplied by 0.9235 and wages exceeds \$160,200 for a given individual.

Nonresident alien. If you're a nonresident alien, see Notice 1392, Supplemental Form W-4 Instructions for Nonresident Aliens, before completing this form.

#### **Specific Instructions**

**Step 1(c).** Check your anticipated filing status. This will determine the standard deduction and tax rates used to compute your withholding.

**Step 2.** Use this step if you (1) have more than one job at the same time, or (2) are married filing jointly and you and your spouse both work.

If you (and your spouse) have a total of only two jobs, you may check the box in option (c). The box must also be checked on the Form W-4 for the ther job. If the box is checked, the standard deduction and tax brackets will be cut in half for each job to call ate withholding. This option is roughly accurate for job nth similar ay; otherwise, more tax than necessary may withheld. this extra amount will be larger the greate. differer in pay is between the two jobs.



Multiple jobs. Complete eps 3 through 4(b) on only one Form W-4. Withholds. Fill be recovered accurate if you'de this on the Form W-4 the alghest paying job.

Step 3. This provides instruction or determining the amount of the d tax credit and the credit for other may be abl ts than claim when you file your retur. qua. r the a tax credit, the child must e under a 17 as o. er 31, must be your dependent no genera. es with you for more than half the year d must have the required social security number. be able to claim a credit for other dependents for ้อน m a child tax credit can't be claimed, such as an older r a qualifying relative. For additional eligibility ents for these credits, see Pub. 501, Dependents, reau eduction, and Filing Information. You can also lude ower tax credits for which you are eligible in this such as the foreign tax credit and the education tax **]**. To do so, add an estimate of the amount for the year to your credits for dependents and enter the total amount in Step 3. Including these credits will increase your paycheck and reduce the amount of any refund you may receive when you file your tax return.

#### Step 4 (optional).

Step 4(a). Enter in this step the total of your other estimated income for the year, if any. You shouldn't include income from any jobs or self-employment. If you complete Step 4(a), you likely won't have to make estimated tax payments for that income. If you prefer to pay estimated tax rather than having tax on other income withheld from your paycheck, see Form 1040-ES, Estimated Tax for Individuals.

Step 4(b). Enter in this step the amount from the Deductions Worksheet, line 5, if you expect to claim deductions other than the basic standard deduction on your 2023 tax return and want to reduce your withholding to account for these deductions. This includes both itemized deductions and other deductions such as for student loan interest and IRAs.

Step 4(c). Enter in this step any additional tax you want withheld from your pay each pay period, including any amounts from the Multiple Jobs Worksheet, line 4. Entering an amount here will reduce your paycheck and will either increase your refund or reduce any amount of tax that you owe.



### FORM WV IT-104 WEST VIRGINIA EMPLOYEE'S WITHHOLDING EXEMPTION CERTIFICATE

Complete this form and present it to your employer to avoid any delay in adjusting the amount of state income tax to be withheld from your wages.

If you do not complete this form, the amount of tax that is now being withheld from your pay may ot be sufficient to cover the total amount of tax due the state when filing your personal income tax return after the see of the year. You may be subject to a penalty on tax owed the state.

Individuals are permitted a maximum of one exemption for themselves, plus an addition exemption for themselves, and any dependent other than their spouse that they expect to claim on their tax return.

If you are married and both you and your spouse work and you file a joint income taxurn, or if you are working two or more jobs, the revised withholding tables should result in a more accurate a unit of being withheld.

If you are Single, Head of Household, or Married and your spouse does not and you are receiving wages from only one job, and you wish to have your tax withheld at a lower receiving wages from the box on the bo

When requesting withholding from pension and annuity partits you multipresent tr. letted form to the payor. Enter the amount you want withheld on line 6.

If you determine the amount of tax being withheld insufficient and any reduce the number of exemptions you are claiming or request additional taxes be withheld from a payron od. Enter the additional amount you want to have withheld on line 6.

	T-104 12/20 WEST VIRGINIA SE'S WI HOLDING EXEMPTION CERTIFICATE	
Name_	Social Social Number	
Addres	ss	
City	e Zip Code	
1.	NGLE, and you claim ar emption, enter "1", if you do not, enter "0	
2.	MARRIF on each for husband and wife if not claimed on another certificate.  hese exemptions, enter "2" hese exemptions, enter "1" of these exemptions, enter "0"	
3.	If you classes for one or more dependents, enter the number of such exemptions	
4.	Add the number of exemptions which you have claimed above and enter the total	
5.	If you are Single, Head of Household, or Married and your spouse does not work, and you are receiving wages from only one job, and you wish to have your tax withheld at a lower rate, check here	
6.	Additional withholding per pay period under agreement with employer, enter amount here\$	
certify,	under penalties provided by law, that the number of exemptions claimed in this certificate is not in excess of those	e to which I am entitled.
Date_	Signature	



PO Box 242930 Little Rock, AR 72223 Toll Free 866.710.0456

Online: Palcofirst.com

#### Pay Selection and Direct Deposit Authorization Agreement

		HOW WOULD YOU		PAID?	
Payr	ment Selection: (please	check only one box)			· ·
	☐ Dire	ect Deposit:		Money Network Service	es.*
*If yo	u choose the Money Netw ey Network Services. You	vork Services Option, P will need to sign an add	alco will enroll you ditional Money Ne	u with our partners at twork Services For the en	Data: aroll.
_	est Type (check one): ew Account Setup	☐ Change in Exis	sting Account	□ Can tion	
		DIRECT DEPOSIT A			
A	ccount Holder's Full N	lame	<b>\</b>	or Last 4 of SSN	
F	inancial Institution	Routing Number		Acc. Number	
T	ype of Account (select	t one): $\square$ Che	ch d	avings Pre-	paid card
REQ	UIRED The following	validating document	atio, att le	d:	
depos the re- delay institu- unders initiatii my en Any cl full for	payment to Palco find or local and that it is the palco find of th	on from the second of the end of the part of my find the part of my find the part of my find the part of the part	ebit entries for to the crediting of the risks of she for any chargeten cancellation	account holder name, and paperwork from the purpose of corrections able to initiate debit errors and Palco is not restand Palco is not restand Palco is not restand by my financial in aring an account with less I incur from my finaliately. This authorization in such time and in suble opportunity to act or	pre-paid  ng an erroneous ntries, I authorize sponsible for any by my financia to my account. nstitution prior to others, including ancial institution on will remain in
Printed	d Name				
Signat	ure			Date	

Please return this form to Palco via email: <u>enrollment@palcofirst.com</u> or via fax to 1.877.859.8757.

# **APPENDIX 5**

# MAIN TOOLS SC ORIENTATION AND SKILLS TRAINING GUIDEBOOK



# Support Coordinator Manual

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#### Support Coordination- Using This Guide

Hello Support Coordinator! This SC Manual will serve as one of the most important tools in your toolbox!!! The guide will walk you through the entire certification process section by section and can even be used as a script. This guide is an extension of the Employer Handbook which will be provided to the Participant/Employer however you should not share with guide with anyone externally. It is your resource to be used for explaining all the key topics and educating your participant on everything they need to know.

#### A few tips when navigating in the guide:

- All regular text in black is part of the script and information you should relay in your certification visit to the Participant.
- Anything in blue is a note or tip for you. It may contain instructions or directions on next steps to help guide you.
- Text in purple are email templates or other written resources that you can share with the Participant/Employer via email after the training.
- Anything in red should be emphasized multiple times to the Participant/Employer to ensure understanding as they are key items related to fraud, waste or abuse.

Ultimately this guide is here to educate and support you, but we want you to feel confident and develop your own style. Do not feel like you must be a robot relaying every word. Create a person-centered process by getting to know the Participant you are working with and their situation. Tailor your training to cover the things that they most need to know about. For example, a Participant with a lot of family supports who plans to use all known friends and family for their caregiver supports may not need a lot of training on Section 4 around recruiting. But you should be sure to cover key components like program compliance and who can/cannot be a paid caregiver.

#### Introduction and Employer Handbook

Start the meeting by introducing yourself and your role. The role of the support coordinator is to provide training and support to Arkansas self-directing participants. In this visit, you will be working to certify them with all of the key information necessary to successfully manage their self-directed care. The information covered today will be shared with them via email following the visit today via the Employer Handbook. This resource will be great to save and look back on anytime there are questions. Make sure you have their email address. In addition to this meeting today, you will be contacted by a Palco Enrollment Coordinator whose responsibility it will be to assist you with the paperwork and forms necessary to enroll.

Following this meeting today, I will be your ongoing support for the program to provide you training and resources as you need it. That said, you should always contact Palco Customer Support with questions. They can send me a note to get in touch with you if you need more in-depth assistance. I will also contact you for regular home-based monitoring visits required by the State. Always make sure you take my calls and follow up timely if we miss each other, program rules state if you are not reachable your services can stop so its important we stay in regular contact.

#### Section One-Purpose of the Program

AR Independent Choices gives Home and Community Based Services waiver recipients the opportunity to direct their care and have more control over their caregiver support services. It provides an alternative to traditional agency-based care, nursing facility placement and allows you to hire family and friends you are most comfortable with to do your care.

You will work closely with your Case Manager RN to review your needs and determine the level of care you qualify for. If you have a change in your needs or need assistance you should contact your RN.

Overall, this program is intended to increase independence and self-sufficiency, offer greater control over caregiver supports, improve the quality of services, enable clients to have a healthier and more productive life, and provide opportunity for greater flexibility and control in managing support needs.

There are many benefits of self-directed services. Self-direction represents a shift in the way home and community services are delivered and evaluated.

Clients and their families have the opportunity and support to choose the amount and type of services based on personal assessment, who will provide the services, when and where services will be provided, and how services will be provided.

Consumer directed service models are founded on the principles of self- determination.

So, what is self-determination?

Self-determination is the ability or right to make one's own decisions without interference from others.

Self-determination gives control and choice to the person receiving services rather than a professional deciding what the individual needs.

Self-determination also increases the individual's ability to participate in and contribute to his or her community and live the life he or she wants.

#### The five principles of self-determination are:

- **Freedom** is the opportunity to choose where and with whom one lives as well as how one organizes all important aspects of one's life with freely chosen assistance as needed.
- **Support** Clients have the ability to organize their support in ways that are unique to them. They may want or need assistance to care for themselves, be an active part of their community, or take care of their home.
- Authority- There are two types of authority we will discuss- budget authority
  and employer authority. Budget Authority allows clients to make decisions about
  how their Medicaid dollars are spent, within certain state and federal rules and
  regulations. Clients develop their own spending plan to determine how their
  monthly allocation will be used to support them in the community. Employer
  authority allows the client to select, hire, and manage the workers who will
  support them, including friends and family members.
- **Responsibility** Clients also have an obligation to use public dollars wisely, and to contribute to one's community.
- Confirmation is the recognition that individuals with disabilities should have a leadership role in the redesign of the long-term care service system.

#### Section Two-Roles and Responsibilities

In this section, we will talk about the numerous key players who contribute to the success of the program and what their roles and responsibilities are.

#### **Key Players**

#### Participant

- Manage and direct support services or designate an representative to complete this on their behalf
- Maintain Medicaid eligibility
- Comply with all program requirements.

#### Representative / Employer of Record

- You have the option of having a representative. A representative is chosen when you feel like you are unable to make your own decisions, specifically, decisions about who to hire, how much to pay them, what tasks you want them to do, etc.
- o If you can make decisions like this on your own, you do not need a representative. If you are unable to make these decisions, you can appoint a representative. However, if you appoint a representative, that person will become the employer. In other words, your representative will become your caregiver's supervisor, so the representative will decide who to hire, how much to pay them, how tasks should be done, etc.

#### Caregivers

 Provide day to day support as directed by the Participant/Employer and as outlined in the approved plan of care.

#### Backup Workers

- o Provides support when your regular caregiver(s) are not available
- o Backup workers can be paid or unpaid depending on the arrangement and role they fill in the Participants life

#### Palco

- Pays caregiver(s) via direct deposit from participant's Medicaid funds as authorized in the approved budget/plan.
- o Withholds the appropriate amount of employer and worker taxes.
- o Provides caregivers with W-2s.
- o Provides customer service center to answer general questions.

#### Palco Support Coordinator

 Provides training and support for the Participant/Employer on selfdirected services and the employer roles and responsibilities. o Monitors progress via visits and phone calls to help ensure success.

#### Palco- Enrollment Coordinator

- Assists with processing paperwork and getting the Participant, Employer and Caregivers enrolled
- If a new caregiver is being added/hired they can also assist with getting a packet generated and answer any questions

#### • DHS RN (Nurse)

- Performs a functional assessment of ability to perform activities of daily living and instrumental activities of daily living.
- Determines the types of services that can be received and the number of service hours that you can receive during a biweekly period (14 days).

#### DHS

- Determines the start date for when a Participant can begin services and when their caregiver can start being paid.
- Creates the budget that will be used to pay caregivers and purchase additional items that will allow you to sustain your independence in your home and community.

#### DHS County Office (DCO):

- Oversees your Medicaid status and answers any Medicaid-related questions.
- o Provides information about additional resources.

#### Section Three- Budgets / Chase Expenditure Plans

Medicaid provides a budget that is used to hire a caregiver and buy goods and services that can be used to allow you to live in your community while receiving care. The amount of funding available to you was determined by the number of hours and level of service you require based on your recent DHS nurse assessment.

**Budget Effective Dates** — If you successfully complete your INEO/NEO training and return all necessary paperwork to Palco within the enrollment timeframe, you'll be given a start date from DHS. This is the date that your caregiver can begin receiving payment for his or her services. Palco does not have the authority to give you a start date. Workers must not begin working before you are given the start date. You are liable for any payments due to your caregiver for services provided prior to the start date.

**Total Budget for all Services** — This amount is determined by DHS and is the maximum amount of money you may spend in a 14-day period. Palco has no authority to increase or decrease this amount.

**Employer Tax Rate** — Because you are the employer, you are set up like a small business. Therefore, you are required to pay employer taxes, which come out of your Total Budget for all Service. The tax rate is determined by the Internal Revenue Service, Department of Workforce Services, and Department of Finance and Administration. Palco is unable change this rate. There are four types of taxes that when added together make up the Employer Tax Rate for new employers. If you have self-directed before, you may have a slightly different tax rate:

- Social Security:
- Federal Unemployment Tax (FUTA):
- Medicare:
- State Unemployment Tax (SUTA):

Due to federal and state regulations, your tax rate will typically change once a year. While you cannot control the Social Security, Medicare, and FUTA rates, you do have some degree of control over the SUTA rate. If your caregiver quits or is terminated and receives unemployment, it's possible that your SUTA rate could go up. If you are a good employer, you can reduce your caregiver turnover, thus keeping your SUTA rate lower.

**Hours** — This is the number of service hours that your DHS nurse has determined you may receive in a 14-day period. Palco has no authority to increase or decrease the number of hours you receive. RATE — This is the rate (not including taxes) that your caregiver receives.

While you determine this amount, there are two rules to which you must adhere:

- 1) This rate cannot go below minimum wage, which is \$10.00 per hour.
- 2) You must stay within your Total Budget for all Service.

Rate Plus Tax — This amount shows you how much money per hour it costs you to pay the caregiver. In other words, this is the amount of money that is taken out of your Total Budget for all Service for every hour that the caregiver works. It is figured by adding the Tax Rate to the Rate that you set for your caregiver.

**Cost of Hours** — This is the portion of your **Total Budget for all Service** that you use during a 14-day period. This amount is determined by multiplying the **Rate Plus Tax** by the **Hours**.

You'll probably notice that there is a very small amount left in your **Total Budget for all Service** after the **Cost of Hours-** is deducted. That small amount acts as a cushion in case your tax rate changes during the year. In other words, if your tax rate goes up during the year, that amount could keep you from going over budget. Palco is legally required to refund any remaining funds in your account, including funds leftover for tax rate changes or hours that have been unclaimed for one year, to Medicaid. Furthermore, if you are ever disenrolled from the program, Palco has 45 days to return any unused funds to Medicaid. Therefore, we encourage you to use as much of your budget as possible.

**Overtime and Minimum Wage**- The Department of Labor requires all caregivers to be paid minimum wage, as well as overtime for hours worked over 40 hours in a single work week UNLESS the caregiver lives with the participant. For non-live-in caregivers, DOL requires that overtime is paid at time and a half.

- Live-in caregivers who are exempt from receiving overtime because they live with the Participant must indicate this on their enrollment forms. If this changes at any time, you must notify Palco by completing a new Payroll Information Worksheet.
- Caregivers who do not live in the home with the participant must receive
  overtime wages (time and a half) for hours worked over 40 hours in a single work
  week. If you wish to use all available funds in your CEP to pay overtime claims,
  you must complete the overtime claims processing form, available on our
  website. Palco may only process overtime claims in accordance with DHS policy. If
  funds are not available in your budget for overtime claims, DHS holds you solely
  responsible for paying overtime wages from your private funds.

Should you wish to reduce the risk of incurring overtime or paying overtime claims from your personal funds, there are several options to consider:

- Employ more than one caregiver and spread your hours of care between them so that no single caregiver works more than 40 hours in one work week.
- Reduce your non-live-in caregiver's rate (not going below minimum wage) to create additional available funds for overtime claims.
- Reduce your hours if you have an unpaid backup worker who would volunteer the care.

 Always have a backup worker in place to provide care when your regular caregiver(s) are not available or when another caregiver has reached 40 hours of work in a single week and you do not wish them to work overtime.

Palco is legally required to refund any remaining funds (leftover for tax rate changes or hours that have been unclaimed for one year) to Medicaid. Your Support Coordinator will assist you with using as much of your budget as possible and left just a small amount for any possible tax rate changes. Furthermore, if you are ever disenrolled from the program, Palco has 45 days to return any unused funds (including those funds in savings) to Medicaid.

#### PAUSE THE TRAINING TO COMPLETE/REVIEW THE PARTICIPANTS CEP.

Emphasize that the employer has budget authority. THEY have control over deciding exactly how much to pay the caregiver, designate for other goods/services/savings, all within the budget allotted. When discussing caregiver rate, explain that you are only providing information about the maximum and minimum rate allowed within the budget, but the decision of what amount to pay within that range is up to the employer.

#### Section Four- Caregiver Criteria

#### Hiring

As an employer, you must follow certain federal and program rules when choosing a caregiver.

One federal rule that must be followed is the FLSA (Fair Labor Standards Act), which falls under the jurisdiction of the DOL (Department of Labor). Current program policies require caregivers to be paid at least minimum wage.

Other DOL rules which should be adhered to include, but are not limited to, paying overtime and minimum wage to non-live-in caregivers, providing caregivers with a safe and healthy work environment, and fair treatment of a caregiver. In addition, you may not hire a caregiver who is under age 18.

The Department of Homeland Security requires workers to prove their eligibility to work in the U.S. As such, your caregiver is required to complete an I-9 (found in worker packet) to prove this eligibility.

The last federal law which must be followed is the EEOC (Equal Employment Opportunity Commission) standards, which refer to federal laws prohibiting job discrimination. In other words, when screening and hiring a caregiver you must not

discriminate based upon race, color, religion, gender, national origin, age, sexual orientation, etc.

Adhering to federal laws (i.e., FLSA, EEOC, DOL) as they relate to the hiring and treatment of your caregiver can protect you from potential frivolous lawsuits.

In addition to the federal rules which must be followed, there are several important program rules related to choosing caregivers that also must be followed. One of those rules is that the Participant and the Caregiver may not share a home unless they are related by blood or marriage. There are two exceptions to this rule which prohibit a spouse from being paid as a caregiver and a representative from being paid as a caregiver.

Last, employers should carefully choose a caregiver who will be fully dedicated to caring for the participant as frequent changes in caregivers (4 changes in a 12-month period) could result in additional counselor training or possible disenrollment from the program. Furthermore, after carefully choosing a dedicated caregiver, employers should effectively train, supervise, and evaluate the caregiver to avoid frequently caregiver turnover.

#### Recruiting

If you do not already have someone in mind to be the caregiver, you'll need to go through the hiring process to find a suitable caregiver. The hiring process, which can be summarized in six steps.

Step #1 — Write a job description.

A job description helps you identify what expectations you'll have for your caregiver, summarize what tasks you want your caregiver to do, how you want these tasks done, and when you will need a caregiver to do these tasks. Consider the characteristics you want the ideal candidate to have: Available work schedule, honesty and integrity, communication styles, dependability, level of experience and reliable transportation.

Step #2 — Finding Candidates.

After you have written an effective job description, advertise the position to find candidates. The advertisement should include a general description of what tasks are needed, the hours you want someone to work, your contact information, etc. However, there are also certain pieces of information that should NOT be

included in your advertisement like your home address, private health information, whether or not you live alone, etc.

#### Step #3 — Screening Candidates.

Once you have enough interested applicants, you may begin the screening process to see which applicants you want to interview. Look through the information they provided you to For Internal Use Only 34 Compliance Manual see if they have the necessary skills and experience to perform the tasks you need. When you contact applicants to schedule a face-to-face interview, ask them to bring the following to the interview: resume with at least three professional references, a driver's license, and Social Security card.

#### Step #4 — Interviews.

Set up interviews with only your top candidates. It is a good idea to interview more than one candidate so that you can compare the candidates' strengths. Also, the program requires that you have a backup worker for when your main caregiver is unable to work, so you may want to interview for that as well. During the interviews, take lots of notes so that you can review them later. Look for red flags that could indicate potential issues, including: unable to provide references, seeming disinterested, late for the interview, unable to detail prior experience.

#### Step #5 — Check References.

Once you select your best candidates, call their references. Checking references is essential. It gives you valuable information about the applicant. Ask questions about the candidate when calling references. Write down the answers so that you can review and compare answers later. Use the information from the references to gauge whether the candidate is a good fit for you. Look for common testaments across references, red flags, or conflicting statements from references. This information will help you make a decision on the candidate to hire.

#### Step #6 — Selecting Your Caregiver.

After you have interviewed a sufficient number of individuals and checked their references, choose the candidate(s) who will best help you with your needs. You may hire more than one caregiver as needed, especially if you wish to reduce the risk of incurring overtime. When you have made your decision, call the candidate you would like to hire and offer him or her the job. Remind the candidate of the

pay level and number of hours. Since the start date is determined by DHS, it will not be possible to give the candidate a specific date on which s/he can start. However, you can tell the candidate that the sooner Palco receives the worker paperwork, the sooner a start date can be requested from DHS. Many employers choose to hire a relative or friend to care for the participant because the participant often feels most comfortable with a familiar person. The employer's ability to hire a relative or friend is one of the reasons this program is so popular and successful. However, while it is perfectly acceptable to hire a relative or friend to be the caregiver, there For Internal Use Only 35 Compliance Manual are some potential drawbacks that must be considered so that you can develop a plan for dealing with any of these potential negative situations.

Consider the following potential drawbacks to hiring a relative or friend as the caregiver:

- You will be this person's supervisor, thus making you responsible for evaluating him or her. Do you feel comfortable enough to make an objective and unbiased assessment of this person's job performance? Would you feel guilty having to instruct and/or correct this person? Being an employer on this program means that you are in charge not your caregiver. If the caregiver begins to act like the employer, it could be determined that you lack the necessary skills to be an employer, causing your disenrollment from this program.
- Relatives and friends will sometimes disagree on things; this is normal. However, how will you plan to keep these disagreements from affecting your working relationship?
- o If the caregiver performs substandard work, even after additional instruction and training, how would you go about discussing with this person his or her termination? If necessary, can you be assertive enough to terminate a poorly performing caregiver, even if it's a relative or friend?

#### **Paperwork**

Palco has required employment paperwork that must be completed. You must assist your caregiver with completing the paperwork required hiring paperwork. It is you and your responsibility to ensure the paperwork is completed accurately and timely. Your caregiver is not allowed to start working until Palco has provided notice that they are cleared to work. One of the most common delays in an caregivers starting to work is incomplete paperwork and the background checks. If you need help, your Enrollment

Coordinator is available to assist you in understanding the paperwork and the process that is required to complete the paperwork.

These forms are organized for you in the Enrollment Packet. The packet includes all of the forms, instructions for the forms and resources. The fastest most efficient way to enroll with Palco is via an online packet where you can sign electronically. Your Palco Enrollment Coordinator will be contacting you to start that process.

The following checks are required for every caregiver.

- Criminal Background
- Adult Protection
- Child Maltreatment Check

#### Section Five- Employer Responsibilities

#### **Scheduling Caregivers**

Budget funds are used to pay caregivers for specific services; however, the program cannot pay everything that participants need to live independently in their homes. As the employer, you may only ask the caregiver to perform tasks that your program eligibility and DHS nurse authorize for your care.

Once you decide what tasks need to be performed, think about how often the tasks need to be performed. Look at each individual task and consider how often they need to be completed, how much time each task takes and consider if you have organized the tasks in a way that there is enough time to effectively complete them. You may want to consider developing a task grid or some other type of chart depicting how often you want tasks performed.

#### **Supervising Caregivers**

Supervising the caregiver is one of the most important jobs of the employer.

It essentially has two parts: training and evaluating. Training the caregiver goes beyond simply telling him or her what tasks need to be done. To effectively train a caregiver, consider actually demonstrating for them how tasks should be done.

Use the following when deciding how to communicate to your caregiver how you want tasks performed:

- Could you use someone from your circle of support who understands how to perform the tasks to demonstrate this for the caregiver?
- Do you have access to any resources (i.e., pictorial directions or videos)
  that were provided by your physician, nurse, or other medical professional
  that demonstrate how to perform certain tasks? Are you able to provide
  written or oral step-by-step instructions?
- Do some tasks take priority over others?

Be patient with your caregiver during the training process and have reasonable expectations regarding his or her job performance. It may take someone who is new to providing personal care to others a bit longer to master certain tasks than someone with this type of knowledge and experience. Once your caregiver is properly trained, you'll need to shift your focus to evaluating his or her job performance. You'll need to have a plan to ensure that tasks are being performed appropriately.

#### **Terminating Caregivers**

Unfortunately, at some point, you may have to dismiss a Caregiver. It is a good idea to follow some simple guidelines that will make the process less stressful for you.

- In the worker file, you have documented verbal warnings about the issues you are having with the worker.
- You have written warnings that have been discussed and signed by both you and the Caregiver.
- There are corrective actions in the file. It would be wise to put specific timelines with those requested changes in performance.
- As soon as you dismiss an worker, you need to inform your FMS provider according to their process and submit the Caregiver's final timesheet. There are Federal and state labor laws that require the final check to be processed within this timeframe.

## The decision and responsibility to dismiss caregivers is solely up to you as the employer.

Your FMS provider has an unemployment account and file unemployment taxes based on wages paid to their workers. Unemployment benefits may be available to workers who have lost their job through no fault of their own.

The decision to replace a caregiver should be considered carefully. You need to determine under what circumstances you would terminate a caregiver's employment. Some circumstances may be rectified by re-training your caregiver; however, there are some circumstances in which termination is necessary. Ask yourself the following questions when determining if you should terminate a caregiver:

- Is the caregiver treating the participant in an abusive or threatening manner?
- Have you previously communicated to the caregiver what needs to be improved? id the caregiver improve as a result of that discussion and re-training?
- Does the caregiver show a willingness to improve his or her job performance?
- How difficult would it be to find another caregiver to meet the participant's needs and schedule?

#### Other Responsibilities

As the employer, a few additional responsibilities you must adhere to including ensuring your caregivers are complying with EVV and preventing against fraud, waste and abuse. These topics will be covered independently in future sections.

#### Section Six- Payroll and Electronic Visit Verification (EVV)

Payroll is the method by which your caregiver is paid. Your caregiver is paid on a biweekly basis, resulting in 26 paychecks per year. In order for your caregiver to be paid, you as the employer must submit time via Electronic Visit Verification (EVV) and the Palco Connect portal.

Electronic Visit Verification (EVV) is a system which electronically verifies that home or community-based service visits occur by capturing and documenting six points of data:

- Type of service performed
- Individual receiving services
- Individual providing services
- Date of the service
- Location of the service
- Time services begins and ends

EVV is a federal mandate under the 21st Century Cures Act that requires compliance by Medicaid agencies by January 1st 2020.

Your caregivers have two options for using EVV. They may clock in and out using the AuthentiCare mobile app via their smart phone/device or they can clock in and out using Telephony by calling a toll-free number and following the prompts. You will

indicate your preference during the enrollment process with your Palco Enrollment Coordinator.

Information on each method including user guides with images can be found on the Palco website. <a href="https://www.palcofirst.com/arkansas">www.palcofirst.com/arkansas</a>

Once time is captured using EVV, both the Worker and Employer must approve the time at the end of the pay period to submit it to Palco. All approvals take place in the Palco Connect portal which is an online website which can be access from any computer or smart phone browser. Connect is also the place where edits and manual entries can be made. For example, if a caregiver forgot to clock in and needed to correct the time entry to reflect the correct time they started their shift, they can do this in Connect.

All time entries go through an approval process to ensure everyone is in agreement. Here is how the time flows.

- 1) Caregiver clocks in/out using EVV
- 2) Time is transferred into Palco Connect in an "Open" status under the Worker
- 3) Worker logs in to review the time, makes an necessary edits/additions and submits the time to the Employer
- 4) Employer logs in to review the time sheet and either approves or rejects the time
  - a. Rejections are returned to the worker to correct and resubmit
- 5) Employer approved timesheets are submitted to Palco for processing
- 6) Palco runs validations and completes budget checks to determine payments based on program rules
  - a. Palco may need to reject a shift/timesheet that is not payable and requires corrections by the worker/employer.
- 7) Payment is issued on pay day following the published payroll schedule

More details on this process can be found in the Connect for EVV User Guide located on the Palco website

When the Employer submits the time to Palco, this is their attestation that the time is correct and accurate. Submitting time for shifts that were not worked is considered fraud and will be reported by Palco. Employers should safeguard their password for Connect and not share this with anyone. Palco is a mandatory reporter of any suspected fraud.

#### Payroli Schedule

The Biweekly Payroll Schedule lists the dates of the biweekly service periods, submission due dates for timesheets, and pay dates. You can find a copy of the Payroll Schedule on the Palco website. The Arkansas Payroll Schedule follows a two week Tuesday – Monday work week. Time submissions in Connect are due by the employer no later than the Thursday following the end of the biweekly pay period. Payments are issued by Palco the following Wednesday for those dates of service.

#### Payments to Caregivers

Your caregivers will be paid via direct deposit to the account they have on file. This can be updated by submitting a new Direct Deposit Authorization Agreement found on the Palco website at any time. On pay day, Caregivers and Employers can access their pay stubs via the Connect portal by selecting "Payments" at the top. Pay stubs will not be mailed by Palco, they should be accessed via Connect.

Just like employers have to pay employer taxes, employees (caregivers) have to pay taxes. This is mandated by federal and state laws.

As a result, your caregiver should understand that taxes and other possible deductions (e.g., garnishments, etc.) are withheld first. In other words, if a caregiver is paid \$8.50 per hour and works 20 hours during a pay period, he or she should not expect to have exactly \$170 (\$8.50 x 20 hours) directly deposited into his or her account, because that amount does not account for the federal taxes, state taxes, and other possible deductions that Palco is required to withhold.

Part of being an employer is to provide your caregiver with a W-2 for the previous year's wages. As your FMS provider, Palco will do this for you. It is important to note that if your caregiver's wages did not meet a specified threshold, his or her withholdings will be returned to him or her. This threshold is determined by the IRS and may change from year to year. In addition, if certain family member rules are met, you may not have withholdings.

#### W-2s

Palco will issue all caregivers a W2 at the end of the year on behalf of the employer. W2s are mailed no later than January 31<sup>st</sup> each year. Caregivers should follow up with Palco only if they have not received this document by the 15<sup>th</sup> of February.

#### Section Seven-Program Compliance

You are responsible for "self-reporting," which means that you are required to immediately report to the appropriate party if certain events transpire.

- Notify the DHS nurse if there's a change in the participant's health or condition, and notify DCO if there are changes in the participant's assets or income. You should contact Palco when any other significant changes occur.
- Palco should be contacted when you want to change representatives. Remember, there's a specific process for changing representatives.
- Palco should also be notified when there is a change in caregivers or a change in your caregiver's live-in status that would affect overtime exemption. Remember that all paid caregivers must submit accurate employee paperwork to Palco prior to being able to pay them.
- Palco should also be contacted if the participant has been admitted to a hospital, rehabilitation facility, nursing home, or other long-term care facility. We need the admission date, and once the participant is discharged, we'll need the discharge papers officially noting the admission and discharge dates and times.

A caregiver may NOT provide services while the participant is in the hospital, rehabilitation facility, nursing home, or other long-term care facility. Caregivers may record time on the timesheet for providing services to participants on the day of hospital admittance and the day of hospital discharge so long as the times on the timesheet don't conflict with the times noted on the discharge or admission papers. If a timesheet is turned in for a pay period in which the participant was hospitalized or in a rehab facility, both the employer and caregiver will be reported to OMIG for suspected fraud. Furthermore, you will be disenrolled from the program.

There is a notification process to follow when planning a trip in which the participant will be out of the home for an extended amount of time. Participants must have their PCP's authorization to receive services outside their home. In other words, if the participant's caregiver wants to accompany the participant on a trip and be paid for providing services during this time, the participant's PCP will have to authorize this before the start of the trip. Additionally, this authorization must be sent to Palco before the start of the trip.

Please note that it is a program requirement that regardless of the reason, any participant who is outside the home for more than 30 days be disenselled. Any act that intentionally or unintentionally violates program policy or Medicaid policy should

immediately be reported to Palco, especially as it pertains to timesheets. It's important to note that Palco has multiple methods in place to detect fraud and abuse.

#### Section Eight- Safety Planning

#### **Workplace Safety**

As a Participant / Employer, you are in control of your services. You will need to monitor your health and communicate your needs to your Caregivers. You must make sure you and your Caregivers know how to spot health problems and know what to do about them.

Consider what your health care and warning signs are and how you will communicate these to your caregivers. Some typical indicators of a Health-Related Emergency are: Chest pain, Shortness of breath, Severe bleeding, Worsening infection, Color change or drainage of a sore.

It is your responsibility to train your caregivers on any information they need to be your employee and provide safe and quality services. Some standard training topics that you should cover include, orientation to your home and preferences, how to use certain equipment your care requires safely and properly, how to monitor health needs or conditions you may have, certain health conditions your caregivers may be exposed to and need to know of, proper lifting and moving, blood borne pathogens, and needle sticks.

For more information on Blood Bourne Pathogens visit the fact sheet on the Palco website. **The best way to help prevent exposure to blood borne pathogens is proper use of sharps containers.** Practices such as recapping needles, washing and reusing gloves and refusing vaccines like Hep B, all <u>increase</u> your risk of exposure.

#### **Emergency Planning**

Planning for unexpected circumstances is essential when receiving self directed services. A written plan may help you think about what to do when you need Caregiver care right away. This plan may be a simple call list of your backup Caregivers or a more complex decision tree that can assist you to problem solve and find an Caregiver immediately.

Although optional it is highly recommended to complete a Health Care Emergency Form. An example plan can be found on the Palco website.

The following information should all be kept on your Health Care Emergency Form: Preferred hospital info, Primary Care Physician info, Medications and

**Medication schedule, and Pharmacy information**. You should also include anything you think would be useful in an emergency.

If you have a disability and rely on Caregiver services, you should make plans before a community-wide disaster occurs. By planning ahead of time, you can be ready to solve some of the problems that might arise in the event of a disaster. Preparing for a disaster will help you to cope and recover more quickly. The rest of Section 8 contains recommendations that may help you to plan ahead for possible disasters.

#### Abuse, Neglect and Exploitation

While we want to concentrate on the positive aspects of the Program, there are factors you must consider in regards to your personal safety. Even if you have done your utmost to ensure the quality of your Caregivers, there are times when you might encounter dangerous situations in relationship to your Caregivers. While such events are rare, you must consider the possibilities and take action to ensure your safety.

Types of abuse include: Physical Abuse, Sexual Abuse, Self-Abuse, Neglect, Financial Exploitation, and Self-Neglect.

It is important that you pay attention and can recognize a situation or relationship that may be abusive. This page shows a list of questions you can use to assess potential for abuse, neglect and exploitation.

Here are some tips on how to prevent and stop abuse, neglect, and exploitation: Remember, with anyone – employee, friend, family member or stranger – you ALWAYS have the right to say NO or STOP if they do anything wrong or uncomfortable.

If any type of abuse is happening to the client, report the abuse immediately to someone who can help you. This includes- Your Nurse, Your Support Coordinator, DHS, A friend or family member, or Adult Protective Services.

Even if you have already dealt with a situation and no longer feel you are in danger you should still report it to your Support Coordinator as soon as possible.

#### Adult Protection

In addition to the previously mentioned resources, Adult Protection Services is a valuable resource for reporting abuse, neglect and exploitation. The purpose of the Adult Protection Service is to protect adults who cannot protect themselves. These

adults are known as "at- risk adults." All issues pertaining to APS cases are confidential, including the identity of the reporter(s), Client information and APS response orders.

#### **Backup Workers**

This program requires that you have a backup plan. A backup plan guarantees that you have someone to help you when your primary worker is unable to work. This backup worker is someone you can call to help you with the tasks that your primary caregiver would have done that day. This person can be an informal, unpaid worker, like a family member, or, you may formally enroll another paid worker to serve as the backup worker. If your backup worker wants to be paid, he or she must complete and return an Employee Packet to Palco. Any changes to the backup worker should be communicated to Palco.

#### Section Nine-Fraud

Medicaid is funded by federal and state tax dollars, so any program (like SDSB) that relies on or uses Medicaid funding is heavily monitored to ensure that funds are being used appropriately. The Office of the Medicaid Inspector General (OMIG) is the entity responsible for investigating Medicaid fraud and abuse. In addition, OMIG refers appropriate cases for criminal prosecution, recovers misused Medicaid funds, and monitors Medicaid assistance programs.

Anyone (including family members, neighbors, caregivers, etc.) can report suspected cases of fraud and abuse to Palco, and we are responsible for referring those cases to OMIG. Once a case is referred to OMIG, your account is placed on hold, meaning that Palco will be unable to pay your caregiver until we are granted permission to re-activate your account.

The penalties for committing Medicaid fraud vary and, depending upon the situation, can be applied to both the employer and the caregiver:

- Monetary fines, penalties, and restitution order
- Disqualification from receiving Medicaid benefits
- Civil judgments and liens on any real property you own
- Garnishment of wages
- Criminal prosecutions and a possible prison sentence
- Suspension or loss of professional licenses
- Exclusion from participating in Medicaid as a provider
- Depending on your immigration status, you could be deported.

It is everyone's responsibility to guard against fraud. The following activities are examples of behaviors that would be considered fraudulent:

- Submitting time that a Caregiver didn't actually work
- Forging signatures on a time sheet / logging into someone else's Connect account
- Providing services while someone is in the hospital or nursing home
- Billing for services not approved in your plan of care

Now move into the documentation phase of the visit. Open the SC Notebook and record information you have learned about the Participant during the visit using the "Certification Visit Documentation Template". Record the information you know while verifying it is correct with them verbally, ask questions to gather any details you feel you do not yet have.

# Wrap up the certification visit by reviewing the next steps and a few reminders on key details:

- Next Step Enrollment. A Palco Enrollment Coordinator will be contacting you to complete the required paperwork. You can get started on that process now by having your caregivers start the APS/CPS/Background check process and completing the forms. The forms require a notary and the results can take some time so it is best to start on those right away.
  - o If you do not know who your caregivers will be, start recruiting now.
- Remember- Palco does not issue a start date. Once all of the paperwork and checks are complete, DHS will provide Palco with your start date.
  - Caregivers cannot start work / be paid by Palco until a start date is set by DHS.
- Resources:

You will receive an email (See next page for email template) with valuable information after this visit which will include:

- The Employer Handbook
- Your Cash Expenditure Plan (CEP)
- EVV Training Resources and Materials including a video
- Links to the various resources discussed in the training (backup plan, blood born pathogen safety, health emergency card).

Any questions?

#### **Certification Visit Template**

Subject: Certification Visit Follow Up

#### Hello,

It was nice meeting with you today. I hope you found the information shared during our appointment valuable and you are beginning to feel ready to self-direct your services. Below and attached are some helpful resources to continue your journey towards directing and managing your care. Please keep an eye out for an email/call from your Palco Enrollment Coordinator who will assist with the enrollment forms if you have not heard from them already.

#### Attached:

• Employer Handbook – all the information we covered today (and more) are included in this guide. Please save it so you can reference it whenever needed.

#### Helpful Links:

- Palco Website: <u>www.palcofirst.com/arkansas</u>
  - On the Palco website you can find EVV Training Resources and Materials including a video Links to the various resources discussed in the training (backup plan, blood born pathogen safety, health emergency card).
  - Background Check Packet- In case you want to get started on this process for your workers as it can take some time.

As a reminder, Palco Customer Support is available 8:00 a.m. to 4:30 p.m., CST, Monday through Friday, except on state holidays, to answer any questions you have about program requirements, timesheets, payroll, etc. To reach this staff, please call (501) 604-9936 or toll-free at 1-866-710-0456 (TDD or TTY users, please dial 711 for Arkansas Relay Service).

Thank you!

<SIGNATURE>

# APPENDIX 5

# MAIN TOOLS SAMPLE EMPLOYER MANUAL



# **Employer Manual**

ARKANSAS MEDICAID SELF-DIRECTED WITH SERVICE BUDGET PROGRAM

> PO Box 242930 Little Rock, AR 72223

Phone: (501) 604-9936 Toll-Free: 1-866-710-0456 TDD/TTY: Relay Service 711

Fax: (501) 821-0045

Email: <u>customerservice@palcofirst.com</u>

www.palcofirst.com

V-3.1 / August 2021



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#### **Section One-Introduction**

#### **Self-Determination**

Over the past 20 years, individuals with physical and intellectual and developmental disabilities and their families have been encouraged to take control of their lives and their care using a range of goal-setting, choices and decision-making opportunities under the philosophies of self-determination and self-direction. Through self-determination, individuals with disabilities are able to live at home and participate in their communities.

Self-determination is based on four basic principles:

- 1. Exercising the same rights as other citizens
- 2. Having the authority to control the funding needed for services and supports
- 3. Receiving support through an organization of resources, as determined by the person with the disability
- 4. Taking responsibility to use public dollars wisely

#### **Self-Direction**

In Arkansas, self-direction helps people—18 years or older with different disabilities— exercise more choice and control over their supports, live independently, and engage in their community. They choose the services and supports that they need most and receive them at home. People know their own needs better than anyone, so they can best decide how they would like to receive services. For decades, people all over the country have thrived with self-direction.

The two hallmarks of true self-direction are employer authority and budget authority, as described below.

#### **Hallmarks of Self-Direction**

Employer Authority	<ul> <li>Individuals choose their own workers</li> <li>People have the right to hire, fire, schedule and supervise their workers</li> <li>Services are not arranged by an agency</li> </ul>
<b>Budget Authority</b>	<ul> <li>Individuals manage a specific allowance</li> <li>Allowance can be used to employ workers or purchase approved goods (transportation, rehabilitation, assistive technology, ramps and other)</li> </ul>

Self-direction provides many benefits to individuals, their families, and communities:

 Research shows that people who direct their own services report higher instances of having their needs met, higher satisfaction, and higher quality of services.



- Self-direction can support people to work and volunteer, leading to additional benefits for the individual and the community.
- Self-direction can minimize worker burnout
- Self-direction creates new opportunities within local communities to employpeople who
  may otherwise not be employed.
- When people have the opportunity to direct their own budget, they can use that money to purchase goods and services within the local community.
- Self-direction can help ease financial burdens individuals face as workers.

Self-direction has other names: participant direction and consumer direction.

#### **Financial Management Services (FMS)**

Financial Management Services (FMS) helps families and program participants manage and distribute the funds of a participant-directed budget. The FMS agency pays participant workers by calculating and processing payroll, purchasing approved goods and services, and withholding, filing, and paying federal, state, and local taxes. The agency also tracks participant budgets and identifies instances where participants go over or under the budget.

Vendor Fiscal/Employer Agent (VF/EA) is a type of FMS. Under this model, companies like Palco become th accounting agent for the employer of recordThis means that Palco assists with paying taxes, setting up workers' compensation insurance, and generating payroll, as required by Federal law (26 U.S.C. §3504 (Internal Revenue Code) and IRS Rev. Proc. 2013-39). For more information on the program setup, visit Medicaid.gov and search for "Self-Directed Services."

#### **Section Two- The Program**

#### **Program Overview**

In Arkansas, the self-direction option is called the Independent Choices (IC), also known as the Self-Directed with Service Budget, or SDSB program. IC gives you flexibility in your daily routine, giving you the opportunity to take greater control of your life. The goal of IC is to:

- Increase your independence and self-sufficiency
- Improve the quality of attendant support you receive
- Enable you to have a more healthy and productive life
- Allow you greater flexibility and control in managing your support needs
- Places you in the role of making decisions about attendant support

On the IC program, you are the boss. As the boss, you have control of how your personal assistance services needs are met. When you choose to self-direct these supports, you are your worker's employer. You make the decisions of how things are done and who does them. You can recruit, hire, train, manage, supervise, and fire workers.

You receive a cash allowance for your personal assistance services and decide how it will be spent.



You may want to use your entire allowance to pay for a worker, or you may choose to use part of your allowance to purchase other items that support your care and independence.

Having more choice and control brings with it more responsibility. Having the choice to make decisions about your care and how services are provided is almost like running your own small business.

#### **Program Eligibility**

IndependentChoices(IC) is a service offered to adults 18 years or older who meet all the eligibility requirements for participation. One of the main responsibilities of participating in IC is complying with all program requirements, including maintaining your Medicaid eligibility.

IC is a Medicaid-funded program, so if you lose Medicaid funding, you will automatically be removed from the program.

Additionally, make sure you complete your annual re-assessment through DHS or its contractor. Always make sure that your representative is present when DHS or its contractor visits. If your authorized hours change after the assessment, please notify your worker immediately. The person you intend to hire as your worker <u>cannot</u> sign the assessment. **Unfortunately, Palco cannot help you receive additional hours during your assessment.** 

Along with being removed for losing Medicaid eligibility or missing an assessment, it's also possible to be involuntarily removed for not complying with other program requirements, including the following examples:

- Not having a worker. You must employ an active worker at all times in IC. It may be assumed that participants without a worker don't really need services and should subsequently be removed.
- 2. Underutilizing your budget. This happens when you are not using all of the funds that Medicaid has provided for you to pay your worker, such as your worker quits and you don't replace them. You receive additional hours as the result of a new assessment, but your worker doesn't turn in that additional time on the timesheet. Or, your worker works but for some reason no timesheets are sent in to Palco.
- 3. **Not meeting with the Palco Support Coordinator.** It's required that you be present for each scheduled counseling visit. If you miss two visits in 6 months, you could be removed. Sometimes, employers miss appointments because their contact information has changed. Remember, it is your responsibility to notify Palco with any changes to your phone number, mailing address, and physical address.
- Committing fraud. Those who intentionally or unintentionally commit Medicaid fraud will be removed and will be turned over to the Office of Medicaid Inspector General for investigation.



- 5. **Extended placement in facility care.** The purpose of IC is to provide services inside your home and community. Extended stays in facilities (i.e., hospitalization, rehabilitation, nursing home, etc.) will result in removal from the program.
- 6. **Failure or inability to follow program guidelines.** Participation in this program means that you must be compliant with all program requirements, such as properly using your budget, notifying Palco of critical events and changes in your contact information, and other compliance issues.
- -7.—Situations\_in\_which your health, safety, and well-being\_are compromised by participation in the program. If the program is a threat to your health, safety, or wellbeing, Palco will refer you to other services in order to ensure that your needs are being met safely.

To voluntarily stop receiving services, you will first need to contact Palco Customer Support. Your Palco Support Coordinator may then schedule a home visit to assist you with transitioning off of the program and to other services. If you are a waiver client, changes will not become effective until the following month. Before terminating self- directed supports, your Palco Support Coordinator will first assist you in understanding any issues and offering a corrective action or other supports, if needed.

DHS will send you a letter informing you of your loss of program services. It is important that you read the letter because it lists the date when your case becomes inactive and when your use of the budget must cease. If your worker continues to work after termination of services, you are responsible for paying your worker's wages from your own funds.

You have the right to appeal a decision regarding your removal from the program. Filing an appeal gives you the opportunity to have a decision reviewed. Follow the instructions in the letter received from DHS on how to file an appeal. Additionally, appeal forms are available in your local DHS county office. The date on the letter sent to you regarding disenrollment is the beginning date of the time during which you can file an appeal.

#### **Enrolling on the Program**

Palco will assist you with enrollment on the program. The following tasks must be completed before you will be provided with a program start date:

- ✓ The employer completes initial program training and orientation, as required by DHS, with a Palco Support Coordinator.
- ✓ The employer has completed an enrollment packet to enroll as an employer.
- ✓ The worker has completed an enrollment packet meant to establish their payroll information.
- ✓ The worker has submitted to and cleared a series of criminal and related background clearances.



Once these tasks are completed, Palco will request a program start date on your behalf. You can begin paying your worker once you receive a start date. DHS sets the start date, and it will be sent to you via e-mail. Always notify Palco of any changes in your address. In addition, always keep an email and a working telephone number, preferably with an answering machine or voicemail, so that we can contact you.

#### **Section Three- Resources**

#### **Working with Palco**

Palco, an Arkansas company, partners with the Department of Human Services to guide you through the details of directing your own care through IC.

Palco is an agent for the employer for participants who receive services through self- direction programs. This gives us authority to perform activities like calculating and processing payroll checks for the employer (or participant), and withholding, reporting, and paying of federal, state, and local taxes.

Palco provides you with a Support Coordinator, who helps you understand the program, stay compliant with program guidelines, and monitors your success as an employer.

Support Coordinator Name	Phone Number	Email

Palco Customer Support is available 8:00 a.m. to 4:30 p.m., CST, Monday through Friday, except on state holidays, to answer any questions you have about program requirements, timesheets, payroll, etc. To reach this staff, please call (501) 604-9936 or toll-free at 1- 866-710-0456 (TDD or TTY users, please dial 711 for Arkansas Relay Service). Please have your Palco ID available when you call. Any voicemails received after hours will be returned during business hours within 48 hours.

Participant Name	Participant Palco ID	Employer Name	Employer Palco ID

You may also email Palco at <u>customerservice@palcofirst.com</u>. We respond to all inquiries within 36 hours.

#### **Authorized Representatives**

An authorized representative is person who is your substitute decision maker, family member, or any other identified individual who willingly accepts responsibility for performing employer and budget management tasks that you may be unable or unwilling to perform yourself. Your authorized representative must show a strong personal commitment to you and be willing to follow your wishes and respect your preferences, while using sound judgment to act in your best interest. They must be:



- At least 18 years of age.
- Present and willing to participate in initial training and orientation by Palco Support Coordinators between regular business hours.
- Not convicted of Medicaid fraud or any crime involving abuse or exploitation.
- Understand that they cannot be compensated for serving in this role.

Your representative cannot also be your paid worker. If your authorized representative signed your DHS assessment, he or she cannot become the worker for one year following the date of the assessment. This is a State rule.

**Your authorized representative must serve as your common law employer**. If you choose for them not to fulfill this role, they must serve as an authorized user by completing an Authorized User Designation form. Sometimes, DHS will mandate an authorized representative for you. In those cases, you must comply until a reassessment is done.

To establish or change an authorized representative:

- Meet with your Palco Support Coordinator to ensure that an authorized representative is a good idea for you.
- Determine a good candidate for this role. Your Palco Support Coordinator can assist you.
- Complete and submit the Designation of Surrogate Employer form in your packet.
- Ensure that the authorized representative completes the required program orientation and training with the Palco Support Coordinator.

You are limited to **two** changes in authorized representative per year. Before changing an authorized representative, always discuss with your Palco Support Coordinator.

#### The Employer Guide

This guide includes a lot of useful information and helpful tips and advice for you to refer to in one user-friendly place. Your Palco Support Coordinator will review the information included in this guide when he/she conducts your orientation and training when you enroll in the program and also will refer to it when issues arise. Please review the information included carefully.

When information in the Employer Guide is revised due to changes in state and federal requirements, your Support Coordinator will provide you with the updated information in a format that can be inserted into your copy of the Guide. In addition, a copy of the most updated Employer Guide will be available at palcofirst.com.

Feel free to share this manual with family and friends interested in learning more about IC. We encourage you to make the most of your choice and resources. If we can make your enrollment more satisfactory, please let us know. We look forward to serving you!



#### **Receiving Additional Information**

Self-direction does not mean doing things all by yourself. Palco Customer Support staff and your Palco Support Coordinator and written materials such as this Employer Guide are available to support you along the way. They can be obtained from your Palco Support Coordinator or at palcofirst.com. Contact us if you need this Employer Guide in an alternate format, such as large print or in another language.

Your Support Coordinator is your first stop to answer any additional questions you may have. They will meet with you on a regular basis to discuss questions. If you are enrolled in the ARChoices waiver, depending on the issue, your Support Coordinator may refer you to your case manager, DHS, or others.

Your Palco Support Coordinator will conduct in-person orientation and training with you prior to enrollment. Your Palco Support Coordinator is also required by DHS to make regular visits. This is an excellent time to request additional training, orientation, information, or assistance. In between Support Coordinator visits, should you need additional assistance, please contact Palco Customer Support.

#### Surveys

Palco sends annual surveys to all employers and workers. Please be sure to complete these, as they help us improve our services. You may complete these anonymously online. Palco reviews all survey results, and management determines ways to improve our services based on your responses. Please note that if you report specific issues anonymously, we may be unable to resolve them.

#### **Complaints**

If you have a complaint, there are a variety of options available to you to try to resolve it:

- Contact Palco Customer Support and report your complaint.
- Email info@palcofirst.com and explain your complaint.
- Mail or fax a description of the issue to Palco.
- Speak to your Palco Support Coordinator.

Palco will contact you within five (5) business days of receiving the complaint.

#### **Terms and Definitions**

While reading through this guide, you may come across some terms that you are not familiar with. In addition, contact your Palco Support Coordinator if you have any questions about the information included in this material.

Assessment — An assessment determines a participant's needs and functional requirements.



**Authorized User** — An individual designated by you or your legal guardian to receive your Protected Health Information and communicate with Palco on your behalf.

**Budget** — Medicaid funds set aside for your biweekly (14 days) attendant support and other goods and services.

**Employer** — The individual responsible for hiring, training, supervising, and terminating the worker.

**Participant** — The individual receiving self-directed supports.

**Representative** — An individual designated by you, your legal guardian or, if required by your doctor, if appropriate, who helps administer and manage the program. Your authorized representative must serve as your common law employer.

**Support Coordinator** — Individual employed by Palco who assists the participant and employer with understanding and fulfilling some of the requirements of program participation, helps the employer complete paperwork, and assists with establishing a self-directed budget.

**Surrogate Employer** — An individual designated by you or your legal guardian to act as the employer of your worker. This individual is responsible for performing all state, federal, and program requirements associated with employment of workers.

**Taxes** — Required deductions from your allocation that must be paid on behalf of employees include FICA (Federal Insurance Contribution Act), FUTA (Federal Unemployment Tax Act), and SUTA (State Unemployment Tax Act).

**Worker** — A person who provides attendant support services to you and serves as your employee. This person is also referred to as your employee.



## Section Four- Roles, Rights, & Responsibilities

#### **Participant Rights**

As a participant on a self-directed program, you have the right to make decisions about your care. We are here to help support your rights to:

- Live independently in your home.
- Make your own decisions regarding how your personal care needs are met.
- Have flexibility of when and how services are provided.
- Hire, train, and supervise your worker.
- Administer your finances and how you spend your funds.
- Choose the person you want to hire to provide your attendant support.
- Decide what special knowledge and skills, the person has,
- Train attendants to meet your needs.
- Designate an "authorized representative" to help you.
- Dismiss workers who do not meet your needs.
- Request a budget adjustment if your needs have changed.

#### **Participant/Employer Responsibilities**

When you enroll in the program, there are various responsibilities associated with participation. Additionally, you or the individual you choose are considered the common law employer of the worker hired to provide your services. As such, you are required to perform the following functions:

runctions.	
Enrollment	<ul> <li>Maintain program eligibility through your DHS County Office.</li> <li>Complete the employer tax and authorization forms and an employee packet that Palco provides to you.</li> <li>Complete new employer training and orientation with your Palco Support Coordination scheduled Monday-Friday 8am-5pm</li> </ul>
Training	<ul> <li>Be at home for scheduled visits with your Palco Support Coordinator.</li> <li>Answer all of your Palco Support Coordinator's questions accurately.</li> <li>Submit to proper orientation and training.</li> <li>Prepare and test an emergency backup plan.</li> </ul>
Being an Employer	<ul> <li>Hire and manage workers to provide your services and supports.</li> <li>Comply with federal and state labor laws regarding domestic employment, including setting appropriate wage ranges.</li> <li>Submit accurate timesheets for the work your worker performs.</li> <li>Establish a backup worker for times your worker is not available.</li> </ul>



Managing a Budget	<ul> <li>Purchase/Schedule only the goods and services listed in your budget.</li> <li>Be accountable for your spending.</li> <li>Keeping accurate records of program activity.</li> </ul>
Compliance	Report to Palco all the following:
	<ul> <li>Admission to and discharge from a rehabilitation facility, hospital, or nursing home</li> <li>Any threat to your health, safety, or well-being</li> <li>Any events that cause you to be out of the home for more than thirty days</li> <li>Any acts that you intentionally or unintentionally committed that may be in violation of Medicaid law or IC policy.</li> </ul>

Remember, we are here to help you. Please let us know if you need assistance.

#### **Palco Privacy Practices and Use of PHI**

The Health Insurance Portability and Accountability Act (HIPAA) is a federal law establishing common standards for the privacy and security of health information. Palco ensures the confidentiality of your records in accordance with federal and state laws and regulations. For this reason, Palco cannot discuss your health information with your worker or any other individual who is not your representative.

The only individual who is allowed access to some of your health information is your representative, your Support Coordinator and Palco representatives who are working on your account. No information regarding you will be disclosed, directly or indirectly, except for purposes directly connected with the operation of the IC program.

If you would like Palco to disclose information to a third party, please inform us by completing an Authorized User Designation form. We may need to contact you for more details in such cases.

If you see or know about a possible breach of confidential information, report it as soon as possible. Please call Palco customer service and speak with our Privacy Officer or email <a href="mailto:privacy@palcofirst.com">privacy@palcofirst.com</a>. Explain the potential breach so that the officer can promptly open an investigation and remediate any breaches.



# Section Five- Being a Common Law Employer

#### **Being a Common Law Employer**

When you enroll in the IC program, you or the individual you designate (surrogate employer) is the common law employer of the worker you hire to provide your self-directed supports. You are required to perform employer-related tasks for your worker, and you will receive supports, as needed, from Palco. Palco supports your use of self-direction; *however, we are not employers of your worker*.

The common law employer has many responsibilities, including:

- Receiving initial orientation and training from your Support Coordinator on the requirements of the program; using self-direction; being the common law employer of and hiring, training, supervising, evaluating performance and firing your workers); problem solving; and rights and responsibilities.
- Working with your Support Coordinator to develop, implement and monitor your personcentered plan that includes self-directed supports.
- Working with your Support Coordinator to develop, implement and monitor your budget.
- Receiving additional training, requested or required.
- Completing the Employer Packet.
- Arranging to get the self-directed supports you need with assistance from your Support Coordinator.
- Working with your workers to complete the Employment Packet.
- Determining how much your worker will be paid.
- Developing an Emergency Backup Plan for your self-directed supports with your Support Coordinator and monitoring its effectiveness and updating it, as necessary.
- Hiring, training, scheduling, supervising, evaluating performance, and firing, as necessary, your primary and emergency backup worker.
- Activating your Emergency Backup Plan when your regularly scheduled worker does not report for work for any reason.
- Reviewing, signing and submitting the timesheets for your workers.
- Addressing problems or concerns with your worker's performance.
- Identifying and engaging vendors to provide your individual-directed goods and services included in your person-centered plan and budget.
- Following all program requirements.
- Following and monitoring your person-centered budget and being accountable for your use of budget funds.
- Reporting any incidents of abuse, neglect and/or exploitation to Palco.
- Keeping required records in a safe and secure place.
- Letting someone know if you need help. Work with Palco to successfully complete your required tasks.

If you do not feel you can perform the tasks listed above, you may want to consider designating a trusted individual to be your authorized representative and act as a surrogate employer. In this



role, the individual must agree to be the common law employer of your worker and perform the employer-related tasks on your behalf.

#### **Enrollment Orientation and Training**

All employers are required to undergo orientation and training with the Palco Support Coordinator. The purpose of the training is to ensure that program responsibilities will be fulfilled, set up a budget, complete required paperwork, establish a backup plan, complete required fraud and compliance training, and more. The worker cannot be paid until this training is complete. Palco will then request a start date from DHS, which will be provided to the employer.

Make sure that you complete this training with the Palco Support Coordinator and that you are able to be contacted to establish all visits. Failure to show up at visits, or frequently cancelling visits, may result in your inability to enroll on the program.

#### **Completing the Employer Enrollment Packet**

Your Palco Support Coordinator will assist you with completing all required employer enrollment forms. This begins with an intake process where we obtain important demographic information about you, such as your name, Social Security Number, address, and contact information. Then, the following employer forms must be completed:

- ✓ **Employer Responsibilities & Attestation.** This form describes the role and responsibilities of the employer and includes important information for fulfilling that role.
- ✓ **Employer Authorization Agreement.** This form outlines Palco's responsibilities as the Fiscal/Employer Agent and allows us to provide certain payroll and employment tax reporting on your behalf.
- ✓ **IRS Form SS-4**, *Application for Employer Identification Number*. This form grants Palco the ability to obtain a federal employer identification number (FEIN) with the Internal Revenue Service (IRS) on your behalf. If you already have a FEIN, please notify your Support Coordinator.
- ✓ IRS Form 2678, Employer/Payer Appointment of Agent. This form allows Palco to act as your agent for the limited purposes of paying employment payroll taxes for the worker.
- ✓ IRS Form 8821, *Tax Information Authorization*. This form allows Palco to speak with the IRS on your behalf with regard to issues paying your worker.



## Section Six- Developing the Individual Budget

#### **Individual Budget Overview**

Medicaid provides a budget that is used to pay your worker and reimburse the purchase of allowable goods and services. The amount of funding available to you is determined by your assessment through DHS or its contractor.

In IC, you have budget authority. That means you decide how your cash allowance is spent on your personal needs. Together, you and your Palco Support Coordinator will develop a budget, also known as a Cash Expenditure Plan (CEP), which is a blueprint for how you would like to spend your allowance. Palco is there to help you understand the components of the budget, what is available to you per the rules of the program / interpreting the Medicaid guidelines, and helping you with the calculations where it involves the tax rates you must pay as an employer. Palco will send you a copy of your budget for you to keep for your records. Palco can only process and pay out items allowed in your budget.

#### **Developing the Budget**

Your Palco Support Coordinator will assist you in developing the budget using person-centered planning tools that address your preferences, choices, and abilities. Your circle of support may also be available to assist you in this process.

In order to formulate your budget and create a schedule for your worker, you first need to identify your needs and goals and decide how you want those needs and goals to be met. First, consider your general life and health goals. Secondly, document your plan for reaching these goals. Finally, determine how the services available under the program can help reach these goals.

A helpful tool is a task grid. This helps you notate the tasks that need to be performed, how long they may take to perform, and frequently they should be completed. Use the sample below to help you complete your task grid. Please note there are several ways to complete this. Choose the method that works best for you.

Task	Sun.	Mon.	Tues.	Weds.	Thurs.	Fri.	Sat.
Example Task 1	1.5 hours	0.5 hours	None	2.5 hours	None	1.0 hours	0.75 hours
Example Task 2	Twice	Morning	Night	None	3 times	Night	Morning
Example Task 3	7 am – 9 am	None	6 pm – 11 pm	Noon – 1 pm	6 am – 8:30 am	None	3 pm – 5 pm
Bathing							
Skin/hair care							
Toileting							
Other hygiene							
Dressing							
Feeding							
Ambulation							



Transfers				
Positioning				



Medication				
assistance				
Meal preparation				
Light housework				
Other:				

As you create your task grid, make sure that the activities include all necessary safeguards to protect your health and welfare, including planning for emergencies.

When you are developing your person-centered budget, you also will prepare a Risk Mitigation Plan. Your Palco Support Coordinator will assist you in monitoring the effectiveness of your Risk Mitigation Plan, identifying any new potential risks and strategies to address them, and modifying the plan accordingly.

#### **Allowable Services**

Each budget allows three available services: direct services, other goods and services, and savings.

#### **Direct Care**

Direct services are tasks performed by your directly hired worker. There are two kinds of direct service offered under IC: personal care and attendant care. The services available to you are determined by your eligibility and the assessment done by DHS.

- **Personal Care** is a direct service available to assist you with activities of daily living (ADLs), routine self-care activities, such as the following:
  - Eating
  - Bathing
  - Dressing
  - Personal hygiene, including oral, hair, nail, and skin care.
  - Toileting, including care for enema and/or catheter receptacles, application of diapers, cleaning, and related activities.
  - Mobility, ambulation, and mastering adaptive aids and equipment.
  - Certain other care, such as assistance with prosthetic devices and vision/hearing aids, promoting circulation, repositioning, range of motion exercises, administering oxygen, setting up respiration machines.
- Attendant Care is a direct service intended to reduce or prevent inappropriate
  institutionalization by maintaining, strengthening or restoring functioning in the home or
  community. Attendant care allows assistance with ADLs, instrumental activities of daily
  living (IADLs) and health-related tasks through hands-on assistance, supervision and/or
  cueing.
  - IADLs enhance the quality of life but are not necessary self-care activities. They
    include:
    - Meal planning and preparation



- o Managing finances
- o Laundry
- Shopping and errands
- o Communication
- o Traveling and participation in the community
- Housekeeping
- Assistance with medications to the extent permitted by nursing scope of practice laws.
- Hands-on assistance, supervision and/or cueing includes:
  - A worker physically performing all or part of an activity because the individual is unable to do so.
  - o Getting personal effects, supplies, or equipment ready so that an individual can perform an activity.
  - Observing and redirection, including giving verbal or visual clues and encouragement, standby, and support.
  - o Memory care support.

See below for a summary of each service. If you are unsure of whether a service qualifies as personal or attendant care, talk to your Palco Support Coordinator.

	TASK	PERSONAL CARE	ATTENDANT CARE
	Eating	•	•
ES	Bathing		
Ę	Dressing	•	
ADL ACTIVITIES	Personal hygiene	•	•
AC	Toileting	•	4
D	Mobility and ambulation		•
4	Certain other care	•	•
	Meal planning and preparation		•
	Managing finances		•
	Laundry		
_ ES	Shopping and errands		
IADL ACTIVITIES	Communication		•
<sup>2</sup> E	Traveling and participation in the		
ĕ	community		
	Housekeeping		•
	Assistance with medications		
HAND	S-ON ASSISTANCE, SUPERVISION		
AND/C	OR CUEING		

#### **Other Goods and Services**

You have the option to use your funds to purchase other goods and services, which allow you to



decrease your need for human assistance and increase your independence. Typically, these items are set up on a recurring basis and must be used in the period for which they are allocated.

Some examples of other goods and services you can purchase include medically related transportation not provided through the Non-Emergency Transportation (NET) Waiver; over-the-counter or prescription medications not covered by insurance, Medicaid, or Medicare Part D; purchase or rental of adaptive equipment; communication devices; home modifications; emergency food, clothing, pest control, housing, or utilities; safety devices; technology; environmental equipment; education; and, service animal purchase and maintenance. Palco will pay the vendor of these items directly.

You may also use discretionary cash to purchase personal hygiene items. These items must be paid out of pocket first. Receipts are then submitted to Palco, who will reimburse qualifying items. All reimbursements are paid via Direct Deposit so you must ensure you have that set up. To submit your request, you can email the forms and supporting documents to <a href="mailto:accounting@palcofirst.com">accounting@palcofirst.com</a> Other items may be approved at the approval of DHS. Palco will obtain approval from DHS on your behalf.

#### **Savings**

You have the option to set aside some of your funds to save up for a more expensive good or service. Such items are listed above. Your Palco Support Coordinator will assist you in setting up your budget to allow savings for these items and will coordinate the approval of these purchases with DHS on your behalf.

#### **Amount Available**

DHS sends Palco a total amount for your budget. This amount is derived from your assessment and is the total amount that is available for you to spend each biweekly period. Your Palco Support Coordinator will assist you with turning this amount into a budget.

The IC program is supported by state and federal funds. These funds are used to pay for specific services. The IC program cannot pay for all things that are necessary for someone to live independently in his/her home; it can only pay for the amounts approved in your budget. Palco cannot pay for hours that exceed the DHS approved budget as that would be considered Medicaid fraud.

Certain circumstances may impact how much is available in your budget for a particular period. If you enter a facility or lose eligibility, your budget will be adjusted pro rata for that period. For example, if you lose eligibility for 7 days in a biweekly (14 day) period, then your budget will be 50% for that period, as 7 of the 14 days will be adjusted off. The only exception is that for hospital admissions, both the date of admission and the date of discharge are payable to your worker.



#### Wages

Once you determine how many hours you need your worker per week, you can determine how much to pay them per hour. The U.S. Department of Labor (DOL) and the IRS both require that workers on self-directed programs be treated as employees and not independent contractors. This means that you have to adhere to the following:

- 1. All workers must be paid minimum wage.
- 2. Workers must generally be paid overtime (time and a half) for all services provided over 40 per week, except when the worker lives in their employer's home, per the Department of Labor Home Care Rule. Live-in means permanently or for an extended period of time (or five days per week). Per DHS, if your assessment determines you need more than 40 hours per week, you must have at least two workers.

#### **Taxes**

As an employer on a self-directed program, you are required to pay employment taxes on your worker. Taxes are computed as a percentage of your worker's hourly rate, multiplied by the number of hours they worked. These taxes are:

- **FICA.** FICA includes both Social Security (6.2%) and Medicare (1.45%) taxes. This rate is set by the federal government for all employers and cannot be changed.
- **FUTA.** The federal unemployment tax rate is 0.6% for employers. This rate is set by the federal government for all Arkansas employers and cannot be changed.
- SUTA. The state unemployment tax rate is set by the Arkansas Department of Workforce Service (DWS) and is unique to all employers. Typically, new employers are set up with a SUTA rate of 3.20%. However, the rate can increase or decrease depending on how many unemployment claims are made on your account, how much turnover you have in workers, and the dollar amount of wages you pay. High claims, turnover, and wages can result in high rates. DWS updates this rate annually. As a result, your budget must change annually.

You need to leave some room in your budget to pay these taxes. For example, if your worker makes \$10 per hour and works 12 hours this week, taxes would be figured on \$120. If your total tax rate is 10%, this means that the actual cost to you is  $$132 ($120 + (10\% \times $120))$ . Use the template below to compute what your tax rate is and how this changes the cost per hour of your service.

Step One: Ta	x Rate
Add together FICA, FUTA and SUTA to	determine your total tax rate
FICA	7.65%
FUTA	0.60%
SUTA	<u></u> %
Your Total Tax Rate (A)	%



	Step Tv	wo: Employer Cost Per	Hour	
Attendant Hourly Rate	Multiply	Your Total Tax Rate (A)	Equals	Your Cost Per Hou
	Х		=	

		Step Three: Budget Cost		
Your Cost Per Hour	Multiply	Number of Hours Worked (two weeks)	Equals	Your Cost Per Hour
	Х		=	

#### Remainder

After determining the amount needed to pay your worker, the remainder can be allocated for other goods and services or savings. Palco is legally required to refund any remaining, unspent balances to Medicaid after one year (or 45 days past your program closure date), unless the amount is allocated for savings. Please note that you cannot save to avoid returning funds to Medicaid; an identified item must be established at the time the savings is set up in order to accrue funds for savings.

#### **Modifying the Budget**

You may need to modify your budget due to a change in your worker, needs, goals, or health status. Anytime you would like to modify your budget, contact Palco Customer Support to arrange a visit with your Palco Support Coordinator or, you can discuss with your Palco Support Coordinator at your next scheduled visit. Please note that we can only change the allocation within the same amount of funds you already receive. If you need a change in your total funds, you will need a new assessment from DHS or its contractor.

At minimum, you will receive a reassessment annually. If your budget changes, your Palco Support Coordinator will assist you with changing your budget. All budget modifications must be approved. Please allow three (3) days for modifications to be approved. After this date, the budget change will become effective on the following service period.

#### **Monitoring Spending**

You must monitor your spending based on your budget. Your Palco Support Coordinator will review spending information with you during monitoring visits. In addition, you may call Palco Customer Support and request spending information anytime. It is your responsibility to track your expenditures. Continued over- or under-spending may result in termination from the program, and in some cases, referral to the Office of Medicaid Inspector General.



# Section Seven- Hiring and Managing Workers

As the common law employer of your workers, you or your authorized representative are responsible for recruiting, hiring, supervising, evaluating and firing, when necessary, the workers that provide your self-directed support services.

#### **Roles and Responsibilities of the Workers**

As your employee, your worker is required to do the following:

- Complete new hire paperwork and submit to background screening.
- Perform the tasks asked of him or her, including tasks outside of the home when approved by DHS.
- Adhere to the schedule you set.
- Notify you when he or she is unable to be present for the shift scheduled.
- Submit timesheets and payment requests accurately and on time.
- Follow all program rules.

#### **Worker Qualifications**

To deliver services under IC, DHS requires that all workers meet the following qualifications:

- Be age 18 years or older.
- Be US citizen or legal alien with approval to work in the U.S.
- Have a valid Social Security number.
- Pass a criminal background check (including identity verification and fingerprinting, when required) prior to employment and every three years thereafter.
- Not appear on the Medicaid Excluded Providers Registry.
- Not appear on the Arkansas Child Maltreatment Registry.
- Not appear on the Arkansas Adult Maltreatment Registry.
- Must be able to perform the essential job functions required.

The following individuals cannot be a worker for the participant, per DHS:

- An individual who is considered legally responsible for the client, such as a guardian, power of attorney or payee for Social Security disability check.
- A spouse of the participant.
- A worker, who is not related by blood or marriage to the participant, and who owns the home that the participant lives in.
- Individual who signs the DHS assessment.
- Emergency contact person.

You may hire friends and family members or someone you don't know as your worker—however, everyone must meet the requirements described above.

#### **Recruiting and Hiring Workers**

Decide how many workers you need. One worker doing all the work will likely lead to burnout. With several workers, you have more choices in scheduling, and you have more options for backup and emergencies.



#### **Determining Needs**

Before you can hire a worker, first identify your needs and how you want your worker to meet those needs. Here are some questions to ask yourself:

- What do I need my worker to do?
- How and on what day and time do I want my services provided?
- Do I need more than one person to help me?
- Do I need different people to help me with different things?
- Do I want to hire a full-time or part-time worker?
- Does the person who helps me need to have his/her own car?
- What do I want the people who help me know about me?
- Do I want the people who help me to be friends, neighbors, family members or a person who I do not know and that I recruit and hire?
- What special skills are required for this job?
- How much am I willing to pay for the help I need?

Once you know what type(s) of person(s) you want to hire to help you, you have to start the worker recruitment and hiring process.

#### **Job Descriptions**

Before you start looking for a worker, write a job description—even if you are planning to hire a friend or family member. This will help the applicant know what is expected of him or her and will help you monitor their performance.

A job description should include a summary of the job, required qualifications and criteria the person must meet, specific information on how you want the job done, and the number of hours and days and times you need help. You may want to have the worker you hire sign a copy of the job description and store it in a safe place.

#### Recruiting, Screening, and Interviewing Workers

If you don't know who to hire, you can post to boards at community organizations, your place of worship, employment agencies, or local colleges or universities. You can also place ads in local newspapers. Your Palco Support Coordinator can assist you with writing and posting any ads. For your safety, be careful not to include any overly identifying information in any ads.

Once you find a candidate, it may be beneficial to conduct a phone screening before setting up an in-person interview. Make sure to prepare your interview questions ahead of time.

#### During the interview:

- Ensure that all candidates can meet the requirements and qualifications of IC workers.
- Ask only job-related questions.



- Review the job description with the candidate and ensure that it is something they are interested in and can perform.
- Find out about the candidate's skills and abilities.
- Ensure that the candidate is reliable and will be able to make his or her shifts.
- Try to find out if the candidate's communication style will work for you.
- Look for any red flags that might cause an issue if employed.

As an employer, you must be fair to each applicant. So, there are certain questions you should not ask during a screening or interview, nor use as reasons to hire or not to hire someone. It is against the law to not hire a person for any of the following reasons:

- Marital or Parental Status
- National Origin or Native Language
- Age
- Religion, Schools, and Organizations
- Criminal Record
- Discharge from Military Service
- Race
- Disabilities and Health Problems
- Gender

After the interview, evaluate the applicant's answers to the questions and check references on applicants you might like to hire. Reference checks can provide useful information about the candidate. Use the same questions for each reference so you can have a basis for comparison. Trust your own initial instincts in making decisions about candidates.

Once you've interviewed and evaluated your applicants and checked references, it is time to offer them the job at the rate you established in your budget. If they accept, they must complete a packet to obtain the requisite payroll information.

#### **New Hire Packet**

Palco has certain paperwork we are required to collect for every worker you choose to hire. You Palco Enrollment Coordinator can provide you the necessary State and Federal forms and answer any questions, it is ultimately your responsibility as the legal employer of record to review the forms and ensure they are accurate and true to the best of your knowledge. The packet provided on behalf of the employer by Palco begins with an intake process where we obtain important demographic information about the worker, such as your name, Social Security Number, address, and contact information. Then, the following worker forms must be completed:

- ✓ Worker Information and Qualification. This form describes the roles and responsibilities
  of the worker as it pertains to the self-directed program.
- ✓ **U.S. CIS Form I-9.** This form is required of all workers in the United States in order to verify that the applicant worker can be legally employed. Forms are required to be submitted with the appropriate documentation.
- ✓ Payroll Information Worksheet. This form is used to determine any payroll tax or



overtime exemptions the worker qualifies for in order for Palco to calculate the proper payroll amounts for the worker.

- ✓ IRS Form W-4. This form tells Palco how the worker would like federal income tax withheld from his or her paycheck.
- ✓ **Arkansas Form AR4EC.** This form tells Palco how the worker would like state income tax withheld from his or her paycheck.
- ✓ **Direct Deposit Authorization Agreement.** This form allows Palco to deposit the worker's payroll funds to a bank account.

Do not forget to submit the appropriate documentation with your packet, such as direct deposit attachments, copy of the Social Security Card, and I-9 required documentation.

In addition, DHS requires that the worker complete a separate packet containing forms for criminal background checks and checks with the Adult and Child Maltreatment Registries. Follow the instructions in that packet to submit the documents to the appropriate parties. The worker is required to pay for the cost of the checks out of his or her own funds.

If the worker clears the background check, he or she will be notified by Palco. If the worker does not clear the check, a notice from DHS will be provided in the mail. Your Support Coordinator can assist you with any questions about the new hire packet or criminal background check process.

#### **Training the Worker**

It is important that you train your attendants properly. Proper training allows attendants to provide you with quality support.

You or your authorized representative must develop your worker's schedule based on the number of hours of hours authorized in your budget. It is your responsibility to make sure your hours are received. Workers work for you. Workers who do not have a good understanding of the IC program may think that the authorized hours "belong" to them. If this is the case, you should explain that the worker is your employee and that all service hours belong to you to make sure your needs are met.

Base your worker's work schedule on when your care must be provided. A monthly calendar in a place visible to both you and the worker is an excellent way to document your worker's schedule.

To make sure that your worker provides your care in a way that meets your wants and needs, you need to provide a training and orientation. You are the boss; you direct how services are performed. The training must be delivered in a way that fulfills both your and the worker's personal, cultural, and/or religious preferences.

During training, be patient, communicate clearly, encourage questions, and be assertive about exactly what you want and when. Describe acceptable and unacceptable performance. Explain any medical conditions you have, and provide specific training on any equipment, as well as how



to maintain it. Consider any specific information that should be communicated to your worker, such as:

- Allergies or special dietary concerns and how you would like these handled.
- Procedures for using special medical equipment.
- A list of medications, dosages, and a schedule for administering the medicine.
- Infections or contagious diseases that you or the worker has and how you intend to limit exposure to such diseases.
- Where you keep information needed to protect you in case of emergency (e.g., medical and emergency contacts, how to get out of the house in an emergency)

Finally, the training should include how to submit time to be paid, how you approve the time that is submitted, how they are paid, universal precautions (e.g., handwashing), and the importance of reporting suspected fraud, waste, abuse, and any critical incidents to Palco.

Lastly, before they begin working, make sure they review their tasks and understand their job duties and how they relate to your needs and goals described in your budget.

#### **Supervising the Worker**

An important task as the common law employer is to supervise your workers. Being a good supervisor will help your workers do their best, maintain a good attitude, retain employment with you, and continue to be satisfied with their job. When supervising your workers:

- ✓ Be clear and respectful—remember that workers are people.
- ✓ Be patient—everyone learns at their own speed.
- ✓ Be quick to praise for a job well done or correct when a mistake is made—remember to correct the mistake not the person.

Having good communication between you and your worker is very important. Effectively communicating with your worker will help reduce the number of conflicts or issues that may arise. Effective communication involves listening, giving your full attention to the other party, reiterating what was said, and noticing nonverbal communication, such as body language.

As a common law employer, you or your authorized representative are the leaders in creating a positive work environment in your home and for managing workplace conflicts and related issues. Positive working relationships don't happen by chance. It takes a lot of work and effort on the part of everyone to make a work environment peaceful and pleasant.

It is important that you and your worker establish trust. Trust between an employer and an employee develops gradually in any setting. In your home, you can develop trust and help your worker respect your privacy and your belongings by clearly defining boundaries for acceptable behavior and by limiting the worker's access to private papers and storage areas within your home.

While supervising your worker, it is important to give positive and constructive feedback, so they know how



well they are performing their job. Remember, you are responsible for managing the tasks performed by your worker. If something goes wrong or you are not happy with the way things are being done, it is up to yor your authorized representative to fix it or change it.

Although you supervise your attendants daily, you should still schedule regular evaluations. You can set aside some time every so often to review their performance, hear their feedback and suggestions and confirm the schedule. This allows both you and your attendants to maintain clear lines of communication.

Using a formal evaluation also allows you to reinforce the attendant's hiring agreement and your expectations. Keep copies of all evaluations. If the evaluation includes unsatisfactory performance, put in place a corrective action plan. If you are having problems with an attendant, it can be helpful to review past evaluations as you consider whether to keep them.

Conflicts are a natural part of establishing and building a relationship. Be prepared to deal with problems as they come up. Remember to manage your emotions so things do not get worse than they should be. If a conflict arises, be prepared to problem-solve by:

- Identifying and defining the problem
- Identifying and selecting a solution
- Discussing the problem and solution with your worker
- Planning and evaluating follow-up activities.

You can always talk things over and get advice from your Palco Support Coordinator on how to resolve a situation or if you think you need to dismiss a worker.

#### **Dismissing Workers**

As the common law employer, you or your authorized representative may dismiss your worker directly. The decision to replace a worker should be considered carefully. It can be difficult and often unpleasant to dismiss a worker and often hard work to find and train a new worker.

Be sure to follow the steps below when terminating a worker:

- Complete a Change/Termination Form and submit it Palco within 24 hours of the termination. This is solely so that we can ensure no payroll is issued post-termination. Your Palco Support Coordinator will assist you with determining how you will meet your services needs in the short term (i.e., emergency back-up plan) and methods for replacing the worker.
- Discuss the final timesheet and payment.
- Respectfully terminate the worker. Do not argue with them. Have others present at the termination, as appropriate.
- Initiate your backup plan.

### **Section Eight- Payroll**

#### **Timesheets**

To be paid, you must submit timesheets to Palco by the deadline. Payroll is biweekly, with timesheets due by noon every other Thursday, and payroll falling the following Wednesday after timesheets are due. Timesheets submitted after the deadline will not be paid until the following payroll. A copy of the schedule is at <a href="https://www.palcofirst.com">www.palcofirst.com</a>

As an employer, you are responsible for the following:

- Ensuring the work performed is only the amount allocated in the budget.
- Ensuring your workers comply with and use Electronic Visit Verification (EVV).
- The hours reported were actually worked by the worker.
- All timesheets are completed accurately and submitted on time.
- As the supervisor, you approve your worker's time on the timesheet.
- Ensure that two workers do not overlap time worked for you.
- Ensure that a worker performing two different service hours do not overlap time workers on each service type.
- Not duplicating timesheets (e.g., making copies of pre-filled paper timesheets).
- Ensuring both you and your workers review and approve your time in the Connect portal at the er
  of the pay period, by the deadline.

#### **Electronic Visit Verification (EVV)**

Electronic Visit Verification (EVV) is a system which electronically verifies that home or community-based service visits occur by capturing and documenting six points of data:

- Type of service performed
- Individual receiving services
- Individual providing services
- Date of the service
- · Location of the service
- Time services begins and ends

EVV is a federal mandate under the 21st Century Cures Act that requires compliance by Medicaid agencies by January 1st 2020. Your workers have two options for using EVV. They may clock in and out using the AuthentiCare mobile app via their smart phone/device or they can clock in and out using Telephony by calling a toll-free number and following the prompts. You will indicate your preference during the enrollment process with your Palco Enrollment Coordinator.

Information on each method including user guides with images can be found on the Palco website. <a href="https://www.palcofirst.com/arkansas">www.palcofirst.com/arkansas</a> Once time is captured using EVV, both the Worker and Employer must approve the time at the end of the pay period to submit it to Palco. All approvals take place in the Palco Connect portal which is an online website which can be access from any computer or smart phone browser Connect is also the place where edits and manual entries can be made. For example, if a worker forgot to

clock in and needed to correct the time entry to reflect the correct time they started their shift, they can dethis in Connect.

All time entries go through an approval process to ensure everyone is in agreement and ensure the legal employer of record (the Participant/representative) has approved it.

Here is how the time flows:

- 1. Worker clocks in/out using EVV
- 2. Time is transferred into Palco Connect in an "Open" status under the Worker
- 3. Worker logs in to review the time, makes an necessary edits/additions and submits the time to the Employer
- 4. Employer logs in to review the time sheet and either approves or rejects the time
  - a. Rejections are returned to the worker to correct and resubmit
- 5. Employer approved timesheets are submitted to Palco for processing
- 6. Palco runs validations and completes budget checks to determine payments based on program rul
  - a. Palco may need to reject a shift/timesheet that is not payable and requires corrections by the worker/employer.
- 7. Payment is issued on pay day following the published payroll schedule

More details on this process can be found in the Connect for EVV User Guide located on the Palco website

#### **Connect Registration**

To complete timesheets online, login to <a href="https://connect.palcofirst.com">https://connect.palcofirst.com</a> using your unique username and password. You can register for Connect by using the unique link provided to you in your "good-to-go" email from Palco at the completion of enrollment or by visiting the registration page at, <a href="https://connect.palcofirst.com/#/registration/data verification">https://connect.palcofirst.com/#/registration/data verification</a>. You will need to know your Palco ID number and the last 4 of your social security number to register. All employers and workers must have their own Connect account for the review and approval of timesheets.

#### **Rejections and Resubmissions**

If one of the parties (either worker or employer) rejects the timesheet, or the timesheet does not pass a critical check, Palco is unable to process it for payment, per the guidelines we are required to operate under. Timesheets are checked against budgets, active statuses, service type and other information to ensure that they are payable. Paper timesheets undergo additional scrutiny for errors and to ensure there is no fraudulent submissions.

If a timesheet has been rejected, review the submission for errors and resubmit timely. If the timesheet is resubmitted before the timesheet deadline, it will be processed with the current payroll. For assistance, call Palco Customer Support or discuss the issues with your Palco Support Coordinator. Repeated failure to submit accurate timesheets will result in additional training.

The IC program will not pay for time your worker works that exceeds time authorized in your budget. If the worker works more than the hours on your budget, Palco will pay up to the budget limit, and you are responsible for paying the extra hours out of your private funds. Per DHS, if your assessment determines you need more than 40 hours per week, you must have at least two workers. Your budget will not allow for overtime wages and any overtime wages owed must come out of your private funds.

#### **Paychecks**

Palco processes payroll. All payments to workers are sent by direct deposit. Payday is the following Wednesday after timesheets are due and any time not approved by the deadline will be processed and paid on the next following pay day. In order for your worker to receive funds on time, make sure that Palco has up-to-date direct deposit information on file for your worker. Depending on your bank, allow 48 hours for the funds to show up in your account.

If your worker switches banks without notifying Palco, payroll can be significantly delayed because our staff is required to wait for funds to return to our account before resending to the worker's new bank account. This can take up to two weeks for the pay to be re- deposited into the correct account.

Payments deposited into worker accounts are net wages, which means that payroll taxes and other deductions, such as garnishments, are withheld first. The following is a list of payroll deductions:

- Social Security is deducted from all U.S. employees' payroll at 6.2% of gross pay.
- Medicare Tax is the U.S. health and medical benefits tax that all workers pay at 1.45% of gross pay.
- Federal Income Tax Withholding (FIT) is voluntary, depending on how your worker completed IRS Form W-4.
- State Income Tax (SIT) Withholding is voluntary, depending on how your worker completed Arkansas Department of Finance and Administration Form AR4EC.
- Garnishments are a legal process where an individual repays a debt directly from a paycheck withholding and are deducted as Palco receives court orders.

#### **Special Tax Rules**

If your worker meets the criteria below, the worker could be exempt from FICA:

- Child under 21 employed by parent.
- Parent employed by child, and the child-employer has an underage dependent living in their home who requires continual care, and the child-employer is the sole provider, but unable to care for the underage dependent full time.

Complete the Payroll Information Worksheet if you believe your worker is exempt from taxes. It is your responsibility to update Palco if any of your information changes that could impact your worker's tax exemption status, such as a change in relationship, change in employer, change in age,

or change in address. Failure to update Palco of this information could result in a financial burden at tax-filing time.

If your employer changes, you are required to complete the Payroll Information Worksheet again with the new employer. Payroll cannot be issued until this form is completed and sent back to Palco.

W-2s are available January 31. If receiving the W-2 by mail, please allow one week for delivery. All workers receive a W-2. Workers who earn less than the annual domestic service threshold, per IRS Pub. 15 (Circular E), receive a refund of over-collected FICA. You need to encourage your workers to make sure that the correct address and direct deposit information is current with Palco prior to January 31, even if the worker is no longer working, so that the W-2 and refund, if applicable, can be sent to the proper location.

# **Section Nine- Purchasing Goods and Services**

If funds are available in your budget for a purchase, you can either make the purchase and seek a reimbursement from Palco, or you may obtain a quote or invoice and send to Palco for direct payment to the vendor.

For savings purchases, Palco can either reimburse you, so long as valid and descriptive receipts are provided, or pay the vendor directly. For savings paid directly to you, your worker or unpaid back-up worker cannot share a bank account with you. Make sure that the item you want to purchase was identified in your plan when you initially set up the savings account. Items that cost over \$50 will need to be approved by DHS, your Palco Support Coordinator will obtain this on your behalf. Identify potential vendors that may provide the allowable good or service, and contact them to obtain quotes. It is advisable, but not necessary, to obtain bids from multiple vendors to ensure you are receiving the best price.

Your Palco Support Coordinator can assist you with identifying and engaging vendors to provide the good or service.

Before any payments are issued from Palco, the vendor must be set up in our system. We must obtain a signed IRS Form W-9 and Provider Agreement from the vendor. Other forms may be required as well, depending on the good or service purchased.

Once the vendor is set up in our system, complete Palco's Reimbursement Request form and attach a receipt or invoice from the vendor describing the good or service in detail. Palco may only pay for items that have been pre-approved and for which sufficient funds are available in the budget. Palco will pay to the limit allowed in the budget; any amounts exceeding that must be paid out of your pocket.

Payments for goods and services are made on the same schedule as payroll. Vendors will receive a 1099 from Palco at year-end.

# **Section Ten- Emergency Backup Plan**

Unexpected situations occur. It's important to be prepared in the event of an emergency by having an Emergency Backup Plan that designates one or more emergency backup staff for unforeseen issues or other times when your regularly scheduled worker does not report for work for any reason. The backup plan must be individualized to address the participant's critical contingencies or incidents that would pose a risk of hard to the health, safety, and well-being. Your Plan should include, but not be limited to:

- The name and contact information (phone number(s) and email address) of the individuals who have agreed to be your emergency backup staff.
- The types of support they will provide.
- When they can help you.
- Whether or not they will be paid.
- The order in which your emergency backup staff should be contacted.

Work with your Palco Support Coordinator to identify and designate the individuals who will be your natural support and paid emergency backup staff. Your emergency backup staff can be family members, friends, and neighbors who will help you or a worker you recruit specifically to provide emergency backup care. Make sure that each person named in your backup plan fully understands their role.

Paid emergency backup workers should complete all the steps required to become a worker as soon as possible so that when an emergency arises, they can instantly begin performing work and be paid for those services.

You can change your Emergency Backup Plan and designated emergency backup and natural support staff at any time. Your Support Coordinator will work with you on monitoring and testing your backup plan and making any changes to improve the plan. It is required that the plan is tested twice per year. Please inform your Support Coordinator when you need to a change in the backup plan or if a new worker packet is needed for a paid emergency support worker.

Remember, as soon as you encounter an emergency or unforeseen event, begin implementing your backup plan. Going without services or calling 911 are not sufficient. Going too long without services may also cause your case to be closed.

# **Section Eleven- Home and Personal Safety**

Maintaining a safe work environment, knowing how to recognize and report fraud, abuse, neglect, exploitation, sexual abuse and harassment, and maintaining proper boundaries with your workers are essential to the effective receipt of participant-directed services.

#### **Home and Personal Safety**

Being safe and secure while receiving self-directed supports is essential for successfully living in your own home and community. To ensure personal safety, make sure you and the worker always disclose contagious medical conditions to each other and always engage in universal precautions, such as hand washing.

No one expects you or your worker to be injured while receiving or providing services; however, the possibility exists. You should conduct a safety assessment of your home and fix any issues that could cause injury or welfare issues to you or your worker, such as frayed carpets, pest control issues, sharp surface edges on furniture, pets that are not free of parasites and containing an aggressive pet while the worker or Palco Support Coordinator is in the home.

Consider having a First Aid kit in the home. Post all emergency information, including phone numbers, in a place visible to the worker. Ensure that you have emergency contact for your worker as well. Develop a safety and home evacuation plan for emergency situations, and share this document with your worker. Smart911 is a free service that allows you to create a Safety Profile that includes information about your household to facilitate the proper response to you in case of an emergency. Your Support Coordinator can assist you with developing this plan and enrolling in Smart911.

Please note that domestic employers are exempt from Workers' Compensation in Arkansas, and Medicaid funds will not be used to pay for Workers' Compensation premiums.

#### **Fraud**

Medicaid fraud occurs when you provide false or untruthful information to claim medical reimbursements, such as false timesheets or timesheets that exceed authorized amounts on the budget. Some examples of fraudulent timesheets include requesting payment for time not worked, forging another's signature to the timesheet, or coercing another into giving them part of the payment from Palco even though that person did not work the hours.

Arkansas law (Ark. Code Ann. §20-77-2505), the federal False Claims Act, and the Social Security Act Anti-Kickback Provision (42 U.S.C. 132Oa-7b(b)) all have separate reporting requirements when you suspect fraud, waste, and abuse of public funds. Each of these laws impose penalties for committing the act and for failing to report the act, even if you did not commit it. Penalties range from \$10,000 per incident to 5 years in prison, or both. In addition, the following can occur:

- Disqualification from receiving Medicaid benefit
- Civil judgments and liens on property, including garnishments
- Suspension or loss of professional licenses
- Exclusion from participating in Medicaid as a provider
- Deportation

Palco reports all instances of possible fraud to the Office of Medicaid Inspector General (OMIG). Make sure you comply with OMIG investigations. Once a case is reported to OMIG, your account is suspended, and Palco is unable to pay your worker until we are granted permission by OMIG to re-activate your account.

Take extra precautions to avoid committing Medicaid fraud. If you are unsure of how to complete a document, Palco staff can help you. Always report any instances of suspected fraud to Palco immediately.

Participants that have been removed for fraud will need to be evaluated by Palco and DPSQA to determine if self-direction is an appropriate option. When it's determined a Participant is not a good fit for self-direction and appealing isn't an option, agency services can still be utilized.

#### **Abuse**

Sometimes a worker, family member, or friend may step over the line and become disrespectful or even abusive to you. If you feel uncomfortable around a worker, family member, or friend because of disrespectful treatment, or if you observe someone taking advantage of you or mistreating you, let someone know about the situation immediately.

In Arkansas, abusing a dependent adult, an elderly person, or a child is a crime punishable by law. Criminal abuse of individuals includes physical or sexual abuse, financial abuse, neglect, and psychological abuse or intimidation. If you are being subjected to any form of abuse, report the situation immediately:

- Adult Protective Services at 1-800-482-8049
- Child Abuse Hotline at 1-800-484-5964
- Emergency Responders at 911
- Palco at 877-753-0999 or 501-604-9936

If your worker or Palco Support Coordinator suspect or observe abuse, they are required by law to report their concerns to law enforcement immediately.

You have every right to terminate workers engaging in abuse immediately. At the same time, make sure that you are not abusive or harassing to workers.

#### **Theft**

Preventing theft is an important thing to consider when you have workers and/or vendors in your home. Below are some tips to help you prevent theft:

- Screen individuals thoroughly by calling references and paying attention to background check information.
- ✓ Never leave valuables lying around. Store important or expensive items, like jewelry, cash, credit cards, and identification cards, in locked or otherwise safe locations.
- Always keep track of your medications. Know how much of each medication you have on hand always.
- ✓ Avoid letting your worker write checks or withdraw money from your bankaccount for you. Never give them access to your bank account, nor provide a PIN number for credit or debit cards.
- ✓ If a worker is purchasing something for you with cash, always get a receipt.
- ✓ Never loan money to the worker or add his or her name to your bank account.
- Avoid loaning personal items, including vehicles and keys to your home, to your worker. If a worker does have a key to your home and quits working, change your locks immediately.
- ✓ Keep an up-to-date list of all your valuables such as TVs, stereos, computers, antiques, and jewelry. Should something turn up missing, this list will be helpful to police and to your insurance company.

The above tips will help prevent theft. Letting the attendant know you are paying attention can prevent more theft. Sometimes, no matter what you do, a worker will steal from you. If that happens, you are responsible for addressing and resolving the issue.

If you are the victim of theft, confront the worker or vendor to get their side of the story (unless it would be unsafe to do so). If it is clear that they took something, call the police immediately and inform Palco.

#### **Reporting Critical Incidents**

On IC, you are responsible for "self-reporting" any critical incidents, such as unexpected death, suspected abuse of any kind, theft, financial exploitation, severe injury, medication error, suspected fraud, neglect, and any other threat to your health, safety, and wellbeing. In addition, you must make Palco aware of any changes in you or your employer's contact information, your worker and their contact information, change in health information, hospitalization, or other admission to a facility. **Critical incidents must be reported to Palco within 24 hours.** Reporting on these key items is critical to your ongoing enrollment. Failure to report on these items could mean that you are involuntarily removed from the program.

# **APPENDIX 5**

# MAIN TOOLS SC ADMINISTRATIVE HANDBOOK



# Support Coordinator Administrative Handbook

July 2021

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#### Introduction

Start the meeting by introducing yourself and your role. The role of the support coordinator is to provide training and support. You will be working with Participants and their family members who have significant care needs and want to remain living in their home and community. You will be an essential part of making that possible for them and helping empower them to live the lives that they want!

## **Support Coordinator Tool Box**

The Support Coordinator Tool Box is an SCs main source of all information needed to perform the duties of the job.

Nuts and Bolts: The main key topics and tools used by support coordination.

- **Employer Manual** Introductory Guide on the program, policies, procedures and main functions of being a self-directing employer.
  - Used for initial certifications and EOR changes.
- **Support Coordinator Manual** Internal supplemental resource to guide Support Coordinators on certifying a Participant/Employers from A-Z
  - o Internal use only
  - o Can be used as a script if needed.
- Palco Policies and Procedures for Support Coordination
  - o Company compliance and policies for the position of support coordination
  - Time management, conducting visits, documenting, managing your caseload, navigating CMP and SharePoint, correspondence, dealing with difficult people, customer service, incident reporting, stipend policy
  - Maintained collaboratively by HR and the SC Director to ensure all performance expectations are documented and specific action items that relate to the SC position are communicated.

**Specialty Tools:** Tools used as needed to provide support or enhance someone's knowledge of the self-directed program based on a specific topic area. These resources should provide the knowledge base for an Support Coordinator to provide 1-1 support to a Participant/Employer but also serve as a written resource to be provided via email following the conclusion of the IAA visit.

- EVV Companion Guide
  - o Training Resources, FAQ, User Guides and Videos
- Recruiting Companion Guide

- How to write a good job description, posting an ad, interviewing, checking references and making an offer.
- Steps to request a packet / working with your Palco Enrollment Coordinator
- Employee Management Companion Guide
  - Performance reviews, training, scheduling, corrective action, and termination
- Budget Management Companion Guide
  - Allowable goods and services, CEP overview, Budget methodology information
- Fraud, Waste, and Abuse Companion Guide
  - o Reiteration of the Employer Manual regarding fraud, waste and abuse
  - Every PAR/EOR will be provided this training and companion guide on a minimum of 1x per year
- Compliance Companion Guide
  - Used when a compliance issue is identified and requires follow up by Palco to address the corrective action
- Connect Reports Companion Guide
  - Viewing spending and payment details in the Palco Connect Portal
- Payment Stub Companion Guide
- Health Care Emergency Card
- Program Enrollment Process Flow
- Blood Bourne Pathogen Fact Sheet
- Backup Care Decision Tree

# Managing your Caseload

#### Stay Organized:

- Keep lists: daily and weekly tasks for follow ups and emails and special projects.
- One claim, one participant at a time.
- Familiar with Sharepoint and Notebook.
- Keeps thorough documentation of all interactions, including missed calls.
- Visits/calls kept on outlook calendar.

#### Plan Ahead:

- Plan your day and your week ahead of time.
  - At the end of day, call your next day's visits.
  - o Keep a list of calls to make for the day.

- Set up in home visits at least once every three months.
- Set up phone call check-ins at least once a month.
- Have contingency plans for making billable hours.
  - Keep a list of participants who are willing to have calls/visits in short notice.
  - o Be proactive in creating hours. Call! Call! Call!
  - o Up to 2 unannounced visits can be completed per year.

#### Visits:

- When you arrive, check into Authenticare. Note the travel time in minutes.
- Check reports in CMP
  - o Budget: PC and ATC hours.
  - Account Info: utilization since last visit date.
  - Check for needed enrollment documents.
- Follow the questions script for calls or in-home visits.
- Set up next visit in Outlook calendar.
  - o In-home visits should last about 1 hr.
  - o Call visits should last 30 min to 1 hr.

#### Admin time:

We understand that you cannot be clocked into a participant for every minute of the day. Sometimes you have to do administrative tasks, like planning your day, talking to your supervisor, or attending meetings.

- For every 10 hours that you have billable time, you should have about an hour of ADMIN time in ADP.
- Admin time is when you are clocked into ADP, but not traveling or clocked into Authenticare for a claim.
- Full time employees who work 40 hours should have 3-5 hours of admin time per week.
- Part time employees who work up to 30 hours should have 2-4 hours of admin time per week.

#### **Drive time:**

- Clock all your drive time between visits in Authenticare.
- Use minutes, not hours.
- Ideally, you will end your day closest to home to have the shortest drive.

 Drive time back home is not part of your ADMIN time, but you do need to report your totals so that I can accurately keep track of all the time you are clocked into ADP.

## **Buddy System**

Every Support Coordinator is assigned a buddy on the team. Your buddy is a two way system to help support caseload management and coverage when needed. Examples of how to work with your buddy include:

- If you have down time or a period of no visits, assist your buddy with calls and outreaches.
- If you are going to be on vacation or have time off, reach out to your buddy for help with critical follow ups.
  - o Always put contact info for your buddy on your auto reply.
  - o If you are out unexpectedly for a sick day, contact your buddy in addition to your supervisor so they can assist if need be.
- Assist your buddy in the same way they are assisting you! Be a good team player and try to check in with them regularly.
- If you have general questions or cannot find a resource, check with your buddy first! See if they can assist before reaching out to the whole team or your supervisor.

# **Program Eligibility**

Participation in the Self-Directed Care Budget (SDSB) Program is completely voluntary. To be eligible for this program, participants must meet the following requirements:

- 1. Be eligible for participation in the Arkansas Medicaid Program in a category that allows for self-direction, which includes meeting various financial and needsbased requirements.
- 2. Be eligible to receive one of the following two (2) services:
  - a. **Meet the institutional level of care required to participate in LTSS.**Individuals meet an institutional level of care if they require assistance with two (2) or more activities of daily living ("ADLs").
  - b. Needing assistance with two or more ADLs is also known as being eligible for Long Term Services and Supports ("LTSS"). Medicaid long-term services and supports ("LTSS") serves as a safety net to prevent individuals needing assistance with ADLs from becoming impoverished due to high medical bills by providing assistance to those individuals.

Individuals can qualify for LTSS through Waiver services. b. Meet eligibility requirements for State Plan personal care services. State Plan personal care services are provided to individuals who are Medicaid- eligible, choose to self-direct, and need assistance with one (1) ADL. These individuals must be at least eighteen (18) years of age.

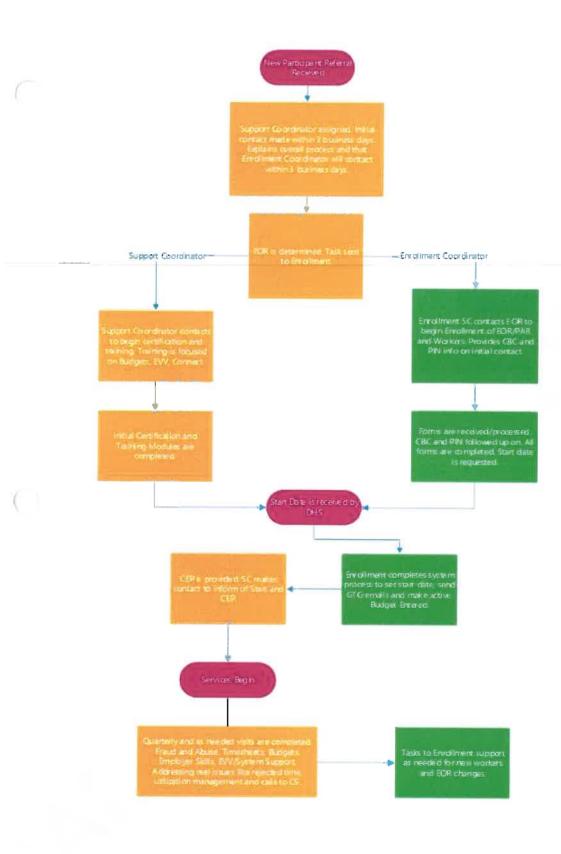
- 3. Understand the rights, risks, and responsibilities of managing one's own care with a spending allowance; or, if unable to make decisions independently, have a willing representative who understands the rights, risks and responsibilities of managing the care of the participant with an allowance;
- 4. Successfully complete a training program designed to assure that the participant or representative will be able to successfully direct the work of a directly hired personal assistant; and,
- 5. Follow the requirements of the SDSB program, which includes not receiving duplicative services through another Medicaid category and not residing in a group home.

# **Support Coordinator Limitations**

It is important to remember the philosophy of self-direction and the role of Palco. Along with the roles and responsibilities come limitations. The support coordinator can provide training and resources by they cannot fulfil any of the employer roles on behalf of the Participant/Employer. A support coordinator can also not tell you who to hire, who to fire, assist you with firing someone. Always stay mindful of these limitations and ask a supervisor for clarification if you are concerned.

#### **Enrollment Coordination**

The Arkansas team has dedicated Enrollment Coordinator resources assigned to support the program and aid with paperwork. They work in tandem with the support coordinator to get new Participants enrolled and can be tasked to help enroll a new worker or change an employer for existing Participants. Their responsibilities include, initiating new enrollments, sending packets, helping with packet completion, processing forms, requesting start dates and updating CMP with any information submitted on paper. Here is an overview of the enrollment process and how the two work in tandem:



## Tasking the Enrollment Coordinator Team

Communication and request to the Enrollment Coordination group can be made via Microsoft Teams in the tasking feature. This allows everyone visibility on the task and a space for documentation as the support coordinator and enrollment coordinator work together. All requests must go through Tasks and have all the required details below.

To access the task board, click on the task icon on your left side bar.

Under the "Enrollment Coordination Requests" bucket, click add task and complete the fields. Once you enter the name of the task and click "add task" you can click on it again to expand the item and add more detail.



- Task Name: Enrollment type and Participant Initials (Ex: New Worker AP)
- Assign: Leave this blank. The enrollment manager will assign it to an enrollment coordinator within 1 business day.
- Due date: 30 days from request.
- Add label- select the enrollment type.
- Priority- if this is an urgent request, mark it as so.
- Notes: enter any key information enrollment needs to know.



Comments field can be used to document correspondence and check on the status of the task. Both the SC and Enrollment Coordinator will make updates underneath the task until it is complete and checked off.

# Correspondence

#### **Email Communication**

Each counselor has a Microsoft Outlook account to be used for work-related emails and an Outlook calendar. All work-related emails must be sent from your Palco Microsoft Outlook account. Additionally, your emails must adhere to the following:

- **Required Email Signature:** All emails must include an email signature in the approved Palco template. You can use this example below to set up yours. For instructions on how to set up your outlook signature, <u>click here</u>.
- Privacy Practices: When sending e-mails regarding a participant to entities
  inside or outside of our organization do not place the participant name or other
  protected health information (PHI) in the subject line. Use the subject link to
  convey the topic and consider the Participants initials if necessary. You can
  include the Participant name and Palco ID in the body of the email.
- **Professionalism:** As with all of your documentation, all emails should use professional, culturally sensitive, and use clear and concise language.
- **Timeliness:** Respond to emails in a timely manner. You are expected to be available to read and respond to emails Monday-Friday, 8 a.m. to 5 p.m., unless other arrangements have been made with your supervisor. All emails should be answered within 1 business day.

#### Phone Communication

Support Coordinators are not provided company issued cell phones or company issued phone lines at this time. To protect the privacy of both the SC and the Participant, every SC should obtain and use a free Google Voice Line for all work-related calls. Google Voice provides a free and dedicated number to be used for outbound and incoming calls. The line can be set to certain business hours for reachable hours and allows SCs to

Jane Doe
Support Coordinator
Office- 501.604.9936
Fax- 501.821-0045
www.palcofirst.com

not need to share their personal numbers. For information on downloading your Google Voice number, <u>click here</u>.

#### **Unreachable Participants**

A situation may arise where a Participant is unreachable for a extended period of time or visits are missed.

A Participant is considered unreachable after an SC has attempted to contact them 3 times every 3 business days. We call this the 3x3 rule.

A visit is considered missed if:

- A Participant reschedules a set visit more than once.
- The Participant/Representative is not home when you arrive.

When a Participant is considered unreachable, the following process should occur:

- 1. After 3x3 rule timeframe has passed, SC should notify their supervisor of inability to reach Participant/Representative via email
- 2. Supervisor will notify the Account Manager and request a "No Contact Letter" be sent to the Participant/Representative.
  - a. Account Manager sends letter.
- 3. If no response by Participant/Representative is received within 15 days, Palco will reach out to DHS to request disenrollment.

# Systems

Below is an overview of each Palco system used by Support Coordination and how to access it. Training and support in each individual system will be provided during new employee onboarding. If you experience technically difficulties or issues with any of these systems, report them to your supervisor.

System Name	Function	URL / Location
CMP	This is the Palco database	https://cmp.palcofirst.com/login
	where all case files and	
	Participant information is	
	stored.	
AuthentiCare –	This is the system where	
Palco	you will record your billable	
	time for all Participant	
	interactions.	
AuthentiCare-	This is the system self-	
Arkansas	directing caregivers use to	

	clock in/out for their shifts when working for their Participant/Representative. You will use it to set up workers and assist with troubleshooting issues as you provide support and training to your caseload.	
Intake	Intake is the Palco system used for Enrollment. It	https://intake.palcofirst.com/
	generates prefilled packets and provides a platform for Participants/Representative s and their Workers to	
	enroll and sign forms online. It is primarily used by the Enrollment	
	Coordinators and	
D.I. T. C'	Enrollment department.	
Palco Team Site	This is the internal company	https://palcoincorporated.sharep
	site used to communicate	oint.com/SitePages/Home.aspx
	announcements, important	
	company info and document policies and	
	procedures. Knowledge	
	base articles on all Palco	
	systems and procedures	
	can be found in this site	
	library.	
SharePoint –	This site is dedicated	https://palcoincorporated.sharep
Support	specifically to the Support	oint.com/sites/SupportCoordinati
Coordination	Coordination team. All	on on
	Support Coordination tools	<del></del>
	and resources can be found	
	on this page. It is the main	
	hub for everything	
	happening on the team and	
	main storage for all	
	important resources and	

	lists. You should log in to	
	this site every day.	
Palco Website	This is the external page	https://palcofirst.com/
	established for	
	Participants/Representative	
	s and their Workers to	
	access Palco information	
	and Forms.	

#### Documentation

All Support Coordinators are responsible for documenting every interaction with Participants/Representatives and their Workers. Every interaction should be clearly and timely documented in the <a href="Palco SC Notebook">Palco SC Notebook</a>.

What is a contact note?

- Means to document any type of contact with or regarding a client or a caregiver
- · Documentation is crucial in our business
- Ensures continuity in quality services meeting regulations
- Ensures team members are all informed
- May have entity-specific guidelines

#### 10 Tips for Writing Effective Contact Notes

#1- Timeliness: Make Timeliness Paramount Notes should be entered as soon as possible from the event being noted. This can be very challenging since everyone is so busy dealing with everything that comes at you in a given day, but the impact of a timely note for you and your co-workers is HUGE. With timeliness, of course, comes increased recollection of details and more immediate access to the most current client information, which will only benefit you and your team.

For this reason, it's always preferred to create the documentation during (or immediately following) contact with your client.

You should *rarely, if ever, let more than 24 hours lapse* before creating your contact note. Simply put, *if it's not documented, it didn't happen*.

TIP: Keep the notebook open and log what you can at the time- fine tune later

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**#2- Thoroughness**: Be as thorough as possible.

Each contact note should assume that the reader knows no case history. It's important to be clear and concise <u>but complete</u> in your explanation; being careful not to leave out pertinent information that someone who isn't familiar with the case would need know in order to understand.

So, when composing your contact note, think of yourself as a TV reporter talking to an audience about an event. If you were a complete outsider to the case, what would you need to know about what happened? What context or history is important to understand, if any?

The important elements to focus on when writing contact notes are that they reflect:

- the reason for the contact, Covers the Why aspect
- the content of the contact, This is the Who, What, when, and where? part
- the outcome of the contact, What as the result?
- the supports/needs addressed during the contact

Overall goal is to make sure that your note is an **easily understood report** of what occurred. You should also include details about who you spoke to and at what number/email. That will ensure any questions about a content can be researched and confirmed if needed.

**#3- Be Objective**: As much as possible, utilize facts in contact note entries. Facts are information which is observed, reported, or historical.

If recording opinions, inferences or assumptions, it is necessary to <u>do so with</u> <u>caution</u> and identify these entries as such. Phrases such as "appeared" or "seemed to be" should be used, then <u>explain why the inference or assumption is being made</u>.

Keep in mind that **contact notes can be requested** by a client or the entity with which we have a contract. Ensure they stay respectful and professional in nature!

**#4- Give Yourself Credit:** Think of each contact note as a **bill for your time.** (In some circumstances, it is a type of billing record!) What did you (or the company) do for or on behalf of the client? What was your role or action step taken? If it was a meeting,

what was the goal of the meeting? If it was in inquiry call, what was your part in the resolution? Be sure to include the "billable" aspect of your contact within the note.

#5 Map The Plan: Many contact notes falter in one key aspect...the next steps. Much of the time, client contacts set into play a plan of action in which we are to perform a function. So be sure to indicate what those next steps are, including responsible parties and timelines. If a client calls with an issue or concern, what are the next steps and who is involved? Did you promise a return call? By a certain time? Make sure the plan is included in your note. This will help when your co-worker receives the same call and will help to prevent a situation where you are both following up on the same issue.

- **#6- Supporting Documentation:** Are there supporting items like documents or emails that you need to consider attaching or including as part of your documentation? Are there other people associated with the contact that you need to link and mention?
- **#7- 3rd Person Perspective**: Contact notes are typically written in the third person, meaning from an **outsider's point-of-view**. Be careful not to use references to self. You would use phrases like "This writer called John Smith" rather than "I called John Smith". The goal is to create a note that could be read by anybody and will sound like an objectively reported occurrence.
- **#8- Use Acronyms Sparingly**: Only use acronyms that are (1) **commonly known** in your business or office or (2) are **established earlier in your note**. Your notes need to be decipherable by all readers.
- **#9- Keep Names and Protected Health Information (PHI) Private:** Do not use one client's name in another client's contact note. This is important since **contact notes are sometimes shared**.
- **#10- Re-read and Edit Before Finishing:** Check your note before you finish and make sure it is free of typos and makes sense. Fine tune and edit last details necessary.

Contact notes are such an important part of our business. I think following these recommendations will help to ensure that your notes are a reliable tool for you and your team and are a prefect representation of the great work your team does each day!

You can find templates for documentation and instructions for navigating the notebook on the first tab. The notebook is organized in alphabetical order. To view/document information for a particular participant, navigate to the tab that corresponds with the first letter of their last name. Then find the page titled with their name and Palco ID. If the member does not have a page, the SC should create one following the template/guidelines of all the rest. It is very important to ensure there is not duplicate pages.

#### Visit Checklists

#### Phone Calls:

- 1. Any changes in health?
  - a. If so, what is the plan to ensure PAR's needs are met?
- 2. Is the REP/EOR available and at the meeting?
- 3. Changes in contact information?
  - a. If so, SC please communicate these changes (update phone number and address if necessary)
- 4. Who is the back-up worker?
  - a. Is the backup plan still in place?
- 5. What approved tasks does the caregiver do on a daily, weekly basis?
- 6. How does the EOR feel about the caregiver's job performance?
- 7. Does the EOR feel that they can effectively supervise the caregiver?
- 8. Is the EOR and EE able to use AC and Connect?
- 9. Are you using all your hours in your budget?
- 10. Does the SC feel that the EOR and PAR are successful with Self-direction?

#### Home Visits:

- 1. Any changes in health?
  - a. If so, what is the plan to ensure PAR's needs are met?
- 2. Is the REP/EOR available and at the meeting?
- 3. Changes in contact information?
  - a. If so, SC please communicate these changes (update phone number and address if necessary)
- 4. Who is the back-up worker?
  - a. Is the backup plan still in place?
- 5. What approved tasks does the caregiver do on a daily, weekly basis?
- 6. How does the EOR feel about the caregiver's job performance?

- 7. Does the EOR feel that they can effectively supervise the caregiver?
- 8. Is the EOR and EE able to use AC and Connect?
- 9. Are you using all your hours in your budget?
- 10. Document the safety and cleanliness of the home.
- 11. Document the appearance of the PAR. Be specific.
- 12. Does the SC feel that the EOR and PAR are successful with self-direction?

# Time Management

Quality counseling depends on good time management. Support Coordinators must be organized, mindful of time and how much time it should take to accomplish a task, be able to effectively utilize resources, and willing to document their actions accurately.

In addition to time management skills, support coordinators must also have good organizational skills with the ability to prioritize all tasks, even the most mundane tasks. As the day or situations progress, re-prioritizing may be necessary to keep things moving in an orderly and timely fashion.

In addition to time management skills, support coordinators must also have good organizational skills with the ability to prioritize all tasks, even the most mundane tasks. As the day or situations progress, re-prioritizing may be necessary to keep things moving in an orderly and timely fashion.

As support coordinators work remotely, they may be frequently interrupted or pulled in different directions. While interruptions cannot be eliminated entirely, individuals get a say on how much time he or she spends on them and how much time he or she spends on the thoughts, conversations, and actions that will lead to success.

To manage time well, it is important to be organized. Without good time management and organizational skills, support coordinators may become overwhelmed and seem sloppy or uncaring, which can jeopardize the participant's ongoing enrollment in SDSB and therefore the health care that the individual receives. Participants may also tend to doubt the knowledge base and skillset of these individuals, as well as the credibility and competence of Palco.

Having strong time management also means being proactive. SCs should set up their calendar in a rolling fashion that sets up future visits for the next month/quarter. Before you leave a Participants home, schedule the next visit so you can both plan for it. At the end of the day, us your calendar to call and confirm tomorrow's visits. This will help you ensure you don't have wasted time for missed visits. Keep track of all of your claims

throughout the day and take notes in real time so you don't waste time going back and trying to remember things. Be proactive in finding billable time by reaching out to Participants you have not heard from in a while or those who generally need more support.

## Logging Travel Time

Travel time should be documented in the Authenticare application for all visits. To enter travel time:

- 1. Click "Enter travel time in minutes" from the client card display.
- 2. Enter travel time in whole minutes only. Ex: 1 hour and 15 min = 75 min.
- 3. Click Done.

#### Home Visit Guidelines

AR Independent Choices gives Home and Community Based Services waiver recipients the opportunity to direct their care and have more control over their caregiver support services. It provides an alternative to traditional agency-based care, nursing facility placement and allows you to hire family and friends you are most comfortable with to do your care.

#### Type of Visits

There are five visit types a Support Coordinator can provide.

- 1. INEO- Initial New Employer Orientation
  - Completed with uncertified Participants only
- 2. New Employer Orientation
  - Completed with active participants who are appointing a new employer / representative
- 3. Frequency -Based Home Monitoring (FBHM)
  - Completed with active participants only
  - Minimum of 1 visit per quarter, maximum of 14 per year
- 4. Issue-Based Home Monitoring
  - Completed with active participants only
  - May only be conducted after the participant has been active for 6 months
  - Conducted when an issue is discovered or reported
- 5. Information and Assistance Visits (IAA)
  - Completed with active participants only.
  - Occurs outside of the monitoring visits when information or assistance is needed

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#### **Scheduling Visits**

Outlook Calendar, Reminders, Communication

# Home Visit Safety

Palco is committed to providing a healthy and safe environment for support coordinators. Due to the multi and diverse functions of the Palco workforce and the varied and diverse locations in which support coordinators perform their job duties, Palco must always be diligent in its commitment. To achieve this goal, it is important that each support coordinator share in this commitment to health and safety of self and fellow-co-worker. No Palco-support coordinator should ever be expected to compromise his or her own health and safety during the execution of their job.

#### COVID

All support coordinators are expected to uphold CDC guidelines and company policies when completing visits with our stakeholders. All support coordinators must be vaccinated for COVID-19 and wear a mask at every home visit regardless of vaccination status and preference. Two company issued reusable masks will be provided. In addition, social distancing, hand washing and universal precautions are mandatory.

#### **Preparing for Visits**

Before leaving to conduct a home visit:

- Review the case documentation to determine whether there are any factors
  associated with the client, family, home, or neighborhood that may pose
  potential safety concerns. If you believe that there may be potential safety
  concerns, consult with your supervisor to determine how to proceed. In
  consultation with your supervisor, a determination will be made whether the
  employee will partner with the supervisor for the home visit or if local law
  enforcement should be contacted for assistance.
- Maintain an accurate Outlook Calendar, shared with your supervisor listing planned visits (including name and address) and maintain that schedule, as much as possible. If plans change while in the field, you should update your calendar before making any unanticipated visits.
- If you have any concerns, connect with your SC Buddy before and after the visit. If you do not make contact within a certain time after the visit was expected to end and cannot be reached by telephone, your buddy can contact your supervisor for next steps.
- Always make high risk visits during normal business hours

- Keep your cell phone charged and powered on at all times when working in the field.
- Be aware of attire choices when making home visits. For example, wear shoes that you can move quickly in if necessary. Be cautious when wearing jewelry, scarves, ties, etc. that could potentially be grabbed. Avoid wearing expensive jewelry or carrying a purse.
- Prepare the materials needed for the visit in advance and carry them with you.
- Learn the activities of neighborhoods in advance and avoid visits when the risk may be higher.
- Counselors may want to keep the following items in their vehicle:
  - A noise making device such as a whistle
  - A change of clothing
  - Clean towels
  - Latex or surgical gloves
  - o Disinfectant hand wipes / sanitizer
  - Plastic trash bags
  - o Face mask
  - o Febreze / Lint Roller

#### Vehicle Travel

To ensure safety when traveling in a vehicle, SC's:

- Must hold a valid drivers license.
- May not engage in the use of or or be under the influence of substances that may impair judgment and/or driving ability while working.
- Follow all laws including speed limits, driver safety and seat belt laws.
- Not text message while driving.
- Talking on the phone while driving should only be done in emergencies.
- May not carry a handgun or other weapon in the vehicle while working.

# Parking and Exiting the Vehicle

- Become aware of the areas in the neighborhood where help could be obtained if an emergency occurs (e.g., local police, fire department, convenience stores, gas stations, restaurants, public facilities, etc.) prior to parking the vehicle, if the home is in an unfamiliar area.
- Avoid parking in areas with poor visibility by others, such as alleys or isolated buildings.

- Have enough gas in the car at all times.
- Park with the vehicle facing the direction you intend to leave.
- Park in the street rather than the driveway when possible.
- Park with the driver's side door easily accessible. Locate the client's building prior to exiting the vehicle if the residence is in an apartment complex.
- Scan the area for potential safety risks prior to exiting the vehicle.
- Take only the items necessary to complete the home visit.
- Purses or wallets should be concealed if they are left in the vehicle.
- Keep keys in a place where they are easily accessible (e.g., coat pocket, clipped to clipboard, etc.).
- Keep vehicle doors locked.

## Approaching the Home

When approaching a home, SCs will:

- Visually inspect the outside of the home and surrounding residences to become aware of people, animals, or unfamiliar vehicles.
- If animals are present and unsecured, do not attempt to approach the home until someone in the home can secure the animal or assure you that it is not dangerous.
- Do not walk around the residence looking in windows if no one answers the door.
   For Internal Use Only 92 Compliance Manual
- Look and listen for signs of disturbance involving or affecting people inside or outside of the residence. For example, is there fighting, crying, dog barking, etc.?
- Take note of any smells associated with illegal substance use or manufacturing that may indicate potential safety concerns.

If you feel that the environment is unsafe, return to your car, drive to a safe place, and call your Supervisor to discuss how to proceed.

# **Entering a Home**

Seek entrance through a door that is in plain sight of the street, when possible, and knock while standing to the side of the doorway. Complete a cursory visual inspection when the door is opened to assess any potential safety concerns which may be present.

If there is a dog or other animal perceived to be threatening, ask that they secure the animal in another room before entering. Complete a cursory evaluation of the client's attitude, demeanor, and behavior to assess for signs of aggression, violence, substance use, or unusual or suspicious behavior. Do not attempt to coerce or be aggressive with a

client who is refusing to give access to the home. Leave the home immediately and consult with your Regional Manager regarding how to proceed.

#### While in the Home

- Sit in an area near or with easy access to an exit and with your back to the wall, when possible. Facing the door usually means that you are facing another person who will be between you and the door.
- Be aware of where you sit, taking care not to sit on sharp or wet items. It is often
  better to sit in a hard-surfaced chair as opposed to an upholstered-cushioned
  chair, if available. Sit on the edge of the chair to ensure quick standing and exit, if
  necessary.
- Sit or stand so that you do not invade the other person's personal space.
   Personal space is the area around a person's body into which others may not come. Intrusion into that space increases anxiety and may be perceived as threatening.
- Remain alert and observant of the environment and the behaviors of those present. Note any unusual smells, such as gas, electrical, or fire hazards, as well as those which may be associated with the manufacture of illegal substances.
- Be aware of all people who are present in the home during the visit, inquiring about any unseen people believed to be in other rooms or unfamiliar people arriving during the visit.
- Do not enter any part of the house without the permission of the client, and remain cautious and observant upon entry to any room.
- Don't attempt to break up domestic arguments.
- Do not accept any food, drinks or gifts from the Participant or others in the home.
- Do not disclose personal information about yourself or internal company topics and information. Remember, you are there to help them.
- Leave immediately if you feel unsafe, drive to a safe place and contact your supervisor.

# **Interacting with Upset Clients**

When interacting with a client who appears upset, SCs should use the following de-escalation techniques

- Be aware of your personal behavior and the risk it may pose to others.
- Be aware that your behavior may unintentionally trigger a response in another person that could not be predicted.

- Be prepared to respond with de-escalation techniques or escape.
- Remain calm. Appear calm, centered, and self-assured even if you don't feel it.
- Be aware of the tone of your voice. Use a modulated, low, monotonous tone of voice. Do not get loud or try to yell over a screaming person. Wait until he or she takes a breath, then talk.
- Be aware of your body language and non-verbal message. Observe the other person's body language and non-verbal behavior.
- Allow the speaker to vent and show you are actively listening.
- Do not be defensive. Even if the comments or insults are directed against you,
   they aren't about you.
- Keep a safe distance between yourself and the client.
- Stand to the side of the individual, instead of directly in front of them. Never turn your back for any reason.
- Always be at the same eye level, but do not maintain constant eye contact.
- Keep your hands out of your pockets.
- Show respect and sincerity, even when setting limits firmly or asking for help.
- Empathize with feelings, but not with the behavior. Do not interpret the client's feelings in an analytic way. Do not argue or try to convince. Do not tell the client what to do, or how you would handle a situation if you were them.
- Trust your instincts. If you feel the de-escalation is not working, leave. Remove yourself from the situation as soon as possible if you feel concern for your safety. Ask for assistance from your Regional Manager when needed.

# Leaving the Home

When leaving the home, SCs should:

- Have car keys out and ready while walking to the vehicle.
- Avoid looking down or digging in your purse or briefcase while walking.
- Observe any people or activities taking place in relative proximity to the residence, the exit route, or the vehicle. If you are afraid or suspect danger, you should go to a previously identified safe place.
- Leave the car and contact someone for alternative transportation, if you believe that you may not be able to return to or enter the vehicle due to potential safety concerns.
- Observe the back seat before entering the vehicle.
- Leave the area immediately. Do not remain outside the residence or in the vehicle to make phone calls or take notes. These activities should be completed when a safe or familiar destination is reached.

- Always wash your hands or use an alcohol-based hand sanitizer after completing a home visit.
- Write notes about everything that happened during the visit as soon as possible.

# **Incident Reporting**

Incident reporting is a critical aspect of helping to keep counselors safe. Without knowledge of incidents, there is no way Palco can work to prevent similar situations from happening in the future. Whenever an incident has occurred, you should report the incident to your supervisor immediately.

# **Frequently Used Contacts**

Entity	Tel:	Email/Website/Address
Palco	Customer Service: 1-866-710-0456 Fax: 501-821-0045	Mail: Palco, Inc. P.O. Box 242930 Little Rock, AR 72223 https://www.palcofirst.com/ Email: customersupport@palcofirst.com
Palco Connect		Register in Connect - https://connect.palcofirst.com/#/registration/ data_verification Connect Portal: https://connect.palcofirst.com/
Authenticare (EVV)/FISERV	Customer Service: 1-800-540-5126	IVR Toll-Free Number for Providers to Clock in/out: 1-800-331-2728
Gainwell (PINS)	PIN Enrollment Status: 1-800-457- 4454	Caregiver must complete the PIN application either by paper/mail or online (preferred) Online: https://portal.mmis.arkansas.gov/armedicaid/provider/Home/ProviderEnrollment/tabid/477/Default.aspx
Department of Health Services	CBC Status Updates: DHS at 501-682-2441.	
Child Maltreatment		

# Appendix A- Arkansas EVV Support Coordinator Manual

#### Logging In

Support Coordinators are issued credentials for the Arkansas EVV Environment by their supervisor. **NOTE THIS IS COMPLETELY SEPARATE FROM THE EVV SYSTEM SCs USE TO TRACK THEIR TIME. WE REFER TO THAT AS THE PALCO EVV System for SCs.** 

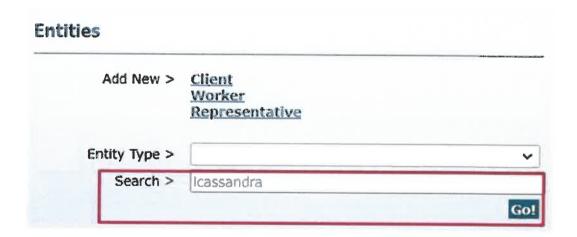
To login, the Employer should Navigate to the AuthentiCare website a <a href="https://www.authenticare.com/arkansas">https://www.authenticare.com/arkansas</a>

#### Registering Workers

The Support Coordinator must register the caregivers for EVV on behalf of the Employer since AR self-directing employers do not have access to the AuthentiCare website.

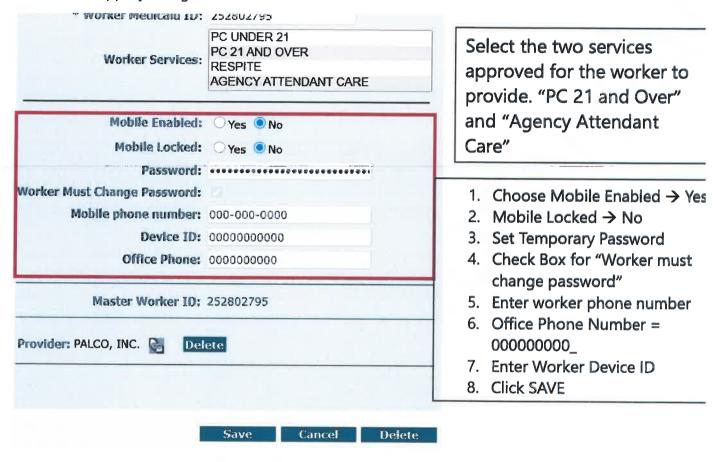
## Setting up Workers for EVV - Mobile App

Search for the worker by typing their last name into the search field on the main page of AuthentiCare after you login. Then click GO.



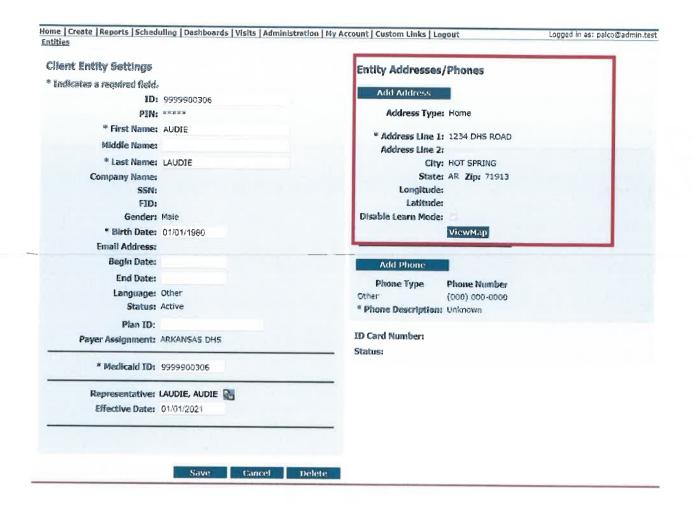
If no results display, this means they do not have a Provider Identification Number (PIN) yet. The PIN must be issued by DHS and entered into CMP (Member info → Program Tab). After it is entered into CMP the job that connects profiles in the Arkansas AuthentiCare environment runs each morning. This means if you enter a PIN into CMP today, you will be able to search for the worker and set them up in Authenticare **tomorrow.** 

Once the search results display, select the record you are going to work on and it will pull up the "Worker Entity Settings" page. On this page you can register the worker for the mobile app by filling out the mobile section.



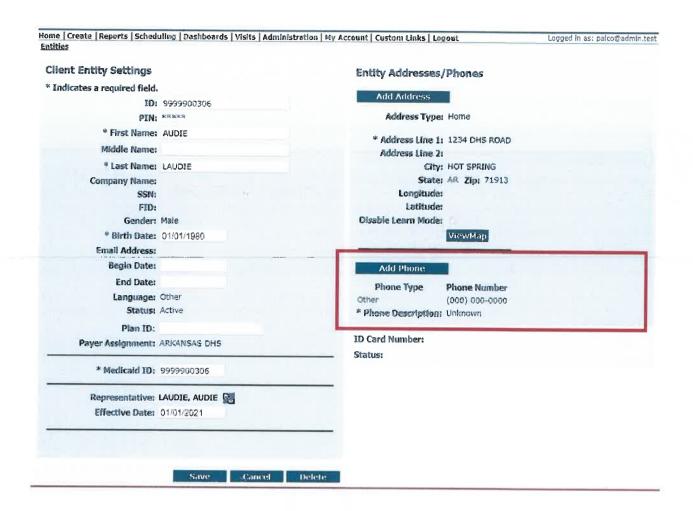
In addition to registering the workers device, the **Client Entity Settings** page must have the correct address listed for the Client. If the Client receives services at multiple locations, multiple addresses should be registered. See image on next page for example.

**Note**: Any demographic information in the AuthentiCare system is fed by the DXC/Gainwell feed through DHS. Palco cannot change any information in this system except the mobile and telephony set up items. If a Participant or Worker wish to update something, they can submit a <u>Gainwell Change of Information</u> Form found on the Palco website.



# Setting up Workers for EVV - Telephony / IVR

For the IVR system to confirm the worker is calling from the correct phone number, the **Client Entity Settings** page must have the phone number listed. See images on the next page for examples. Palco SCs can add a phone number but they cannot delete or change the one fed by the Gainwell system. See the note on Page 24.



#### Worker Entity Settings \* Indicates a required field. ID: 782533 PIN: ----\* First Name: ALEXIS Middle Hame: " Last Name: LALEXIS Company Name: SSN: FID: Gender: Urknown Birth Date: Email Address: Begin Date: 01/01/2021 End Date: Languages Status: Action Mobile App Hode: Standard V

In addition, ensure the correct language is selected on the Worker Entity Setting page. The options are English and Spanish.

# APPENDIX 5

# SPECIALTY TOOLS

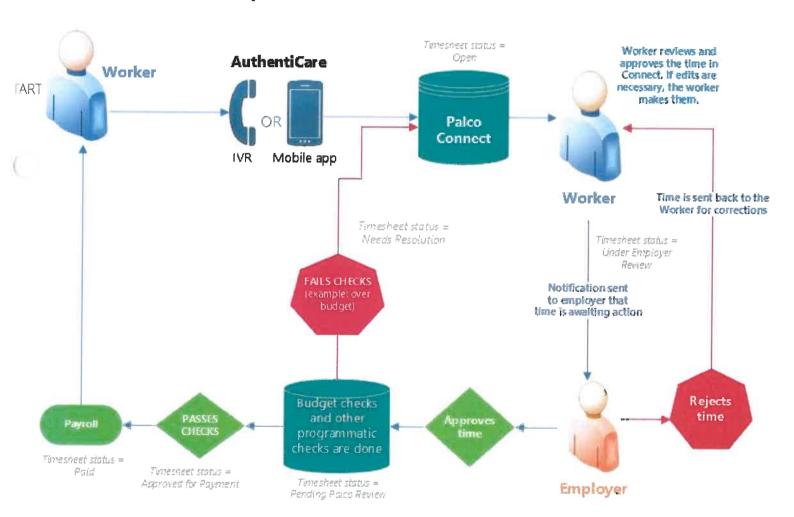
EVV COMPANION GUIDE
RECRUITING COMPANION GUIDE
EMPLOYEE MANAGEMENT COMPANION GUIDE
BUDGET MANAGEMENT COMPANION GUIDE
FRAUD, WASTE, AND ABUSE COMPANION GUIDE
PROGRAM COMPLIANCE COMPANION GUIDE
CONNECT REPORTS COMPANION GUIDE

# CONNECT USER GUIDE FOR ELECTRONIC VISIT ERIFICATION (EVV)-ARKANSAS



EVV is a federally mandated system which electronically verifies that home or community-based service visits occur by capturing and documenting six points of data: type of service, individual receiving services, individual providing service, location of the service and the time the service begins and ends. Once that time is recorded via EVV the shift is uploaded to Palco's online time portal called **Connect**. All program participants and their workers must be registered in Connect to review and submit their time for payment at the end of the pay perio Click here to register for Connect. This user guide will walk you through the time approval and review process.

# Here is how the process works:



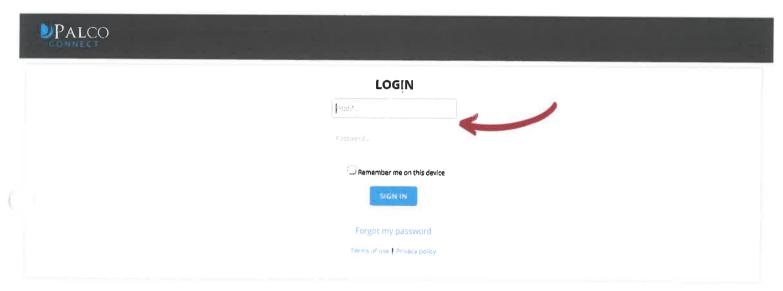
EVV time entries will be inserting into the Connect application as an "Open" status for the worker, employed by the participant to review. The worker, employed by the participant should access the portal per the instructions on the following pages and review and submit the time to the employer. The employer will then access Connect, make the final approval and submit to Palco for processing.

# **Reviewing and Approving The Time**

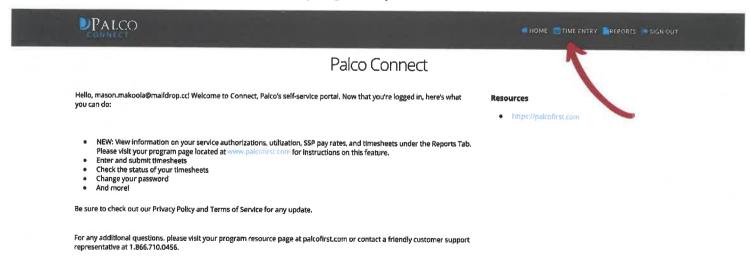
All employers and the worker, employed by the participant, must be registered in Palco's online time portal led, **Connect**. During Enrollment, you will be issued credentials that you will use to log in. At the end of every pay period, the worker must login to review the recorded EVV time and submit it to their employer. The employer will then submit the final approval of the time in order for workers to be paid. Please review the payroll calendar located on our website for full details on the deadline to submit.

#### Part One- Worker Review

1. EVV entries will be inserted into the worker's Connect account for initial review. Workers will access the Connect website <a href="https://connect.palcofirst.com/">https://connect.palcofirst.com/</a> and login using their credentials.



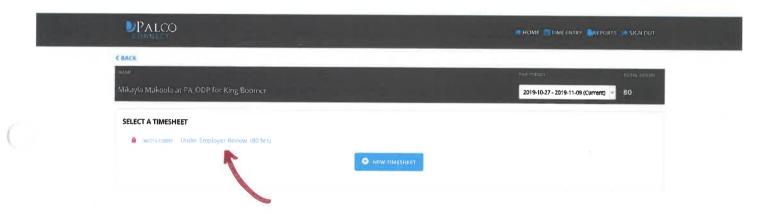
2. Click "Time Entry" located at the top right of your screen.



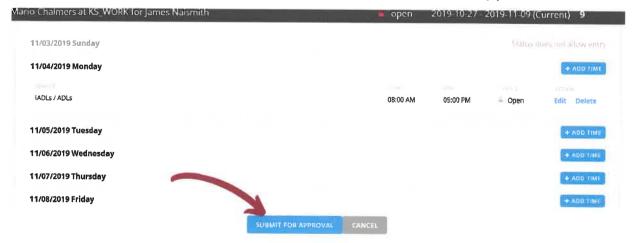
3. Select the Employer/Worker for which you are submitting time. You may see multiple options here if you are associated with more than one person.



4. Select the open time sheet for the correct pay period.



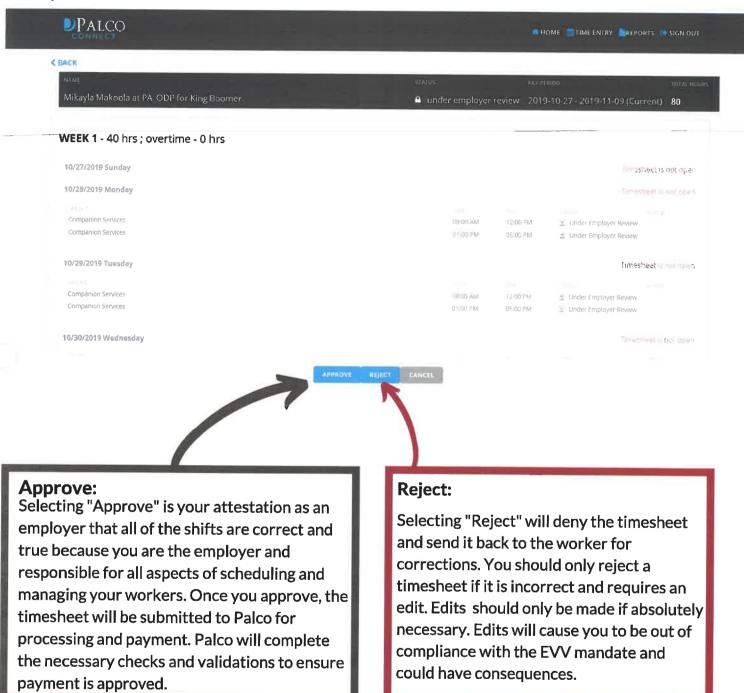
5. Review all of the shifts for accuracy and make any edits if necessary. Once you have ensured everything on the screen is correct, click "Submit for Approval."



Instructions for edits are on Page 5. Note: Edits should only be made if absolutely necessary. Edits will cause you to be out of compliance with EVV mandate and could have consequences.

# **Part Two- Employer Review**

Once the worker has submitted their time, the next and final step is for the employer to eview and submit. The employer will follow the same 1 - 4 steps outlined above to access their Connect account and review the time entry. Once on the time entry screen there are a few options.



As the fiscal agent, Palco can only process and pay for shifts/claims that are within the participant's budget and cash expenditure plan (CEP) as approved by the Department of Human Services. Employers should manage and direct their accordingly, only scheduling their workers for the hours that can be afforded by the budget. Palco is not in charge of scheduling and it is up to the Employer to schedule accordingly or be forced to pay with private funds. Any timesheets that exceed the allocated funds will be rejected for correction by the employer before Palco can process and pay.

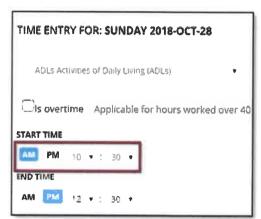
# **Workers- Editing A Timesheet**

1. Once you have accessed the timesheet (steps 1-4 above) select the shift you would like to edit.



2. Review the service type drop down and time entry. Use the drop downs and time selections to enter the correct start and end time for the shift. Ensure you have selected the correct AM and PM selections.





- 3. Select the reason for the edit from the drop down list available.
- 4. Once all edits are complete, review the entire timesheet one last time for accuracy and submit the timesheet. It will go back to the Employer for approval.





Important Note: Edits to timesheets should not occur very often! Compliance with EVV is a federal mandate and making edits to shifts will cause a lack of compliance and issues.

#### **Timesheet Status**

Statuses are available for your convenience to quickly see what stage it is in the payment rocess. You can view the status of your timesheet on the Connect application, Timesheet overview screen. Consult the chart below for status definitions.

Status	Description
Open	Data has been received from EVV system and is ready for worker review. Changes can be made to the time at this stage.
Under Employer Review	Time has been submitted to the Employer for approval.
Needs Resolution	The Employer has rejected the time and sent it back to the worker for correction. Changes can be made to the time at this stage.
Under Palco Review	Time has been submitted by the Employer to Palco. Palco is doing validations on the time ensuring it is payable and there are no issues.
Approved for Payment	Time has passed all Palco checks and validations. It is going through the final step of billing before it can be paid.
Paid	The timesheet is closed and paid.
Rejected	Palco rejected the timesheet for the reason listed in the portal. No changes can be made. To correct, a new timesheet must be started via Connect and will be recorded as an edited timesheet facing the same warnings as listed above.

# Viewing Reports in Connect

In addition to being Palco's time entry system, the Connect Portal also provides valuable reports for supporting the journey of self-directed services and supports. Two of those features are Spending Summaries and Payment Details. Both of these reports can be accessed by logging in to the Connect Portal: <a href="https://connect.palcofirst.com/">https://connect.palcofirst.com/</a>.

Spending Summaries provides quick information to help you easily track your utilization.

**Payment Detail** provides both the employer and employees with access to pay stub information and history.

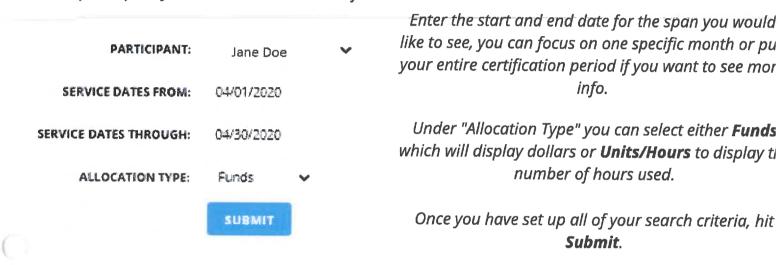
# **Spending**

Spending details are available only to the Employer. To access, login to Connect and select "Spending" from the tool bar in the top right of the screen.

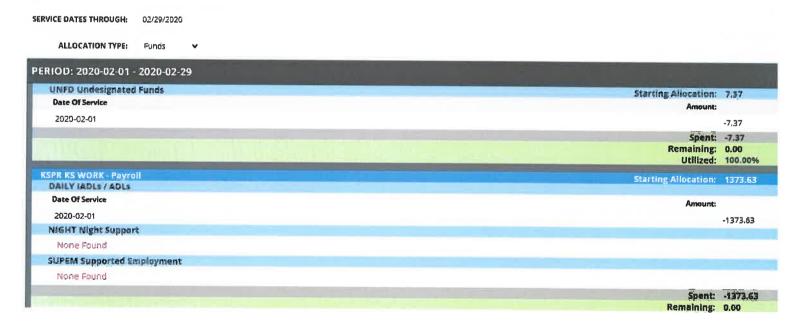


Once on the spending screen, you can enter the details for the date span you would like to see.

If you are an employer for multiple participants, choose the participant you want to see utilization for.



Once you click Submit, the details will display.



You will see the service code, dates, total utilized and total amount remaining for that specific period.

# **Spending-continued**

If you want to see multiple pay periods or months, enter those dates and multiple months will sisplay. At the bottom of the results you will see a section called **Period Totals**. This section will total up all of the months within your search criteria and give you a overall snap shot of spending.

UNFD Undesignated Funds	Total Aliocation:	12.19
	Total Spent:	-7.37
	Total Remaining: Total Utilized:	
KSPR KS WORK – Payrell	Total Allocation:	5628.81
DAILY IADLS / ADLS		
NIGHT Night Support	Total Spent:	-5612.61
SUPEM Supported Employment	Total Spent:	0.00
out and and but out how triested	Total Spent:	0.00
	Total Remaining:	
	Total Utilized:	99.71%

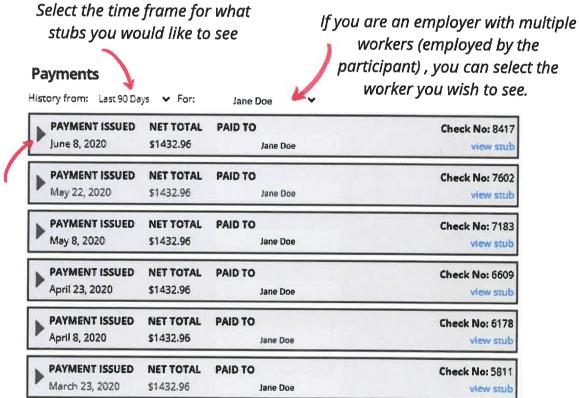
# **Payments**

Payment details are available to both the Employer and the worker, employed by the participant. To access, login to Connect and select "Payments" from the tool bar in the top right of the screen.

PAYMENTS

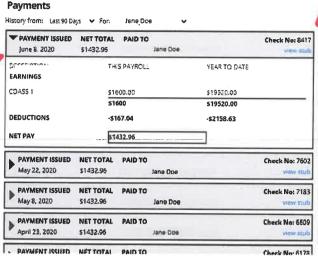
Once on the payment screen there are many options and things you can do.

Choose the black triangle on the left to expand the pay stub you would like to see more details on (shown below).

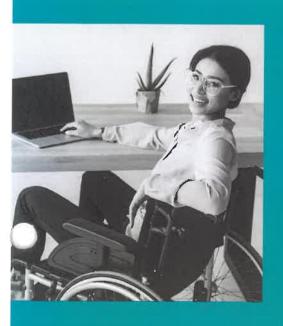


By clicking on the blue "View Stub" link, a pop up will open with full stub details and ability to print.

Within the expanded display more details on the ayment can be seen



Check Number 8417 - Google Chrame connect-test.palcofirst.com/#/view\_stub\_5876d181-fe07-4a80-b682-a90630ad56b8 ENT INTO EARNINGS Service Dates Hours/Units Rate This Parroll Vancto Day CDASS 1 05/16/20 20.0000 \$1600.00 \$19520.00 51600.00 \$10520.00 DEDUCTIONS This Payroll Year to Date -\$651.00 -\$1507.63 CO State Income Tax Federal Income Tax -551.00 -5116.04 EFT Direct Deposit 41137.94 -\$17,170.15 NET PAY 51432.96 Net Pave



### **Other Questions? Contact Palco!**

Phone: 1-866-710-0456

Fax: 501-821-0045

Email: customersupport@palcofirst.com

**Mail**: Palco, Inc. P.O. Box 242930 <u>Little Rock, AR 72223</u>

### AUTHENTICARE MOBILE APP - AR IC



### Electronic Visit Verification (EVV) User Guide

**AuthentiCare®** by **First Data** is Palco's first choice for meeting the federal mandate for EVV. EVV is a system which electronically verifies that home or community-based service visits occur by capturing and documenting six points of data: type of service, individual receiving services, individual providing service, location of the service and the time the service begins and ends. This user guide will walk you through the functionality and features of the mobile app which can be used on any smart device. For more information on EVV visit our website at www.palcofirst.com

### **Download the Application**

### Download the Authenticare App

Step 1: Go to the App Store on your mobile device.

Step 2: Tap on Search

**Step 3:** In the search bar, type "Authenticare"

Step 4: Download the app- "Authenticare 2.0".

Step 5: Complete the download and tap to open.

Allow to access this device's location and Tap

Allow to make and manage phone calls.





### **Initial Set UP**



1. Once downloaded, nter the Setup Code provided to you by Palco, for Arkansas the code is ARKANSASPRD



2. Next, obtain your device ID. Click **Settings** at the bottom right of the login screen.



3. Click **See Device Identifier** from the menu options.



You must provide you device ID to your employer for setup in AuthentiCal before you can use the mobile application

4. Write down your **Device ID** as shown on the screen and provide it to your Employer who will register you in Authenticare.

### **Login to Authenticare**



After setup, login to the app using your Authenticare ID provided by your employer and the Password established by your employer.

### **Resetting your Password**

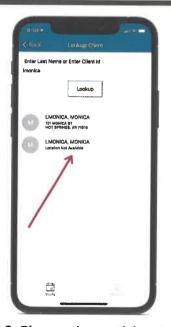


To reset your password, click on "Forgot Password?" from the main login screen and follow the steps to reset and set a new password.

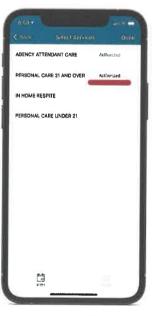
### nployees- Clocking In



1. Click on "New Check-In"



2. Choose the participant from the list of participants. If the participant is not found, click "Lookup Client" and follow the steps.



3. Click on "Service" and select the service you are providing for that shift. You should only choose services the Participant is authorized for.



4. Click on "Submit Check-In" and click "OK" on the confirmation page.

### **Employees- Clocking Out**



 At the end of the shift, login to the app again and select "Pending Check-Out"



2. Select "Activities"



3. Check off the activities that were completed during the shift and click "Done"



4. The next step is to complete the Client Attestation. If the client is available click "Continue to Client Attestation" and hand the device to the Participant. If they are not, you coskip the attestation.



5. On the Client Confirmation page, the Participant should review and check off each item to verify accuracy, then click "Continue"



6. Next, they should sign their name with their finger and select "Done". Then, hand the phone back to the caregiver.



7. After clicking continue, the Check-out Success screen will display.

### **Approving and Submitting Time**

All employers must be registered in Authenticare to review and approve time. During Enrollment, the Support Coordinator will issue the employer credentials that will be used to log in. At the end of every pay period, the imployer must login to review the recorded EVV time and submit it to Palco before the published timesheet deadline. If this does not happen timely, payment cannot be issued. Please speak with your Support Coordinator if you have questions or concerns.

### **General Questions**

### What happens if there is a mistake with the time entry?

The employer will have the ability to manually edit time in Authenticare. The Authenticare for EVV Employer Manual outlines the instructions to make a manual entry or how to adjust time entered. This should only be used as a special exception and not as a regular practice.

### Can the EVV solution be used in rural areas?

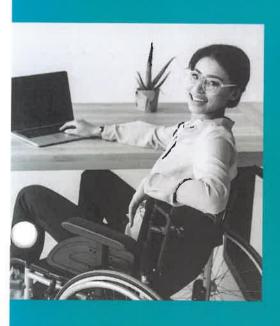
The EVV Solution is designed to work across the state. The mobile application will work without cellular service and can upload information when service is restored or connected to WiFi.

### When is the GPS information collected and how is it used?

GPS coordinates are collected only during the Check-in and Check-out process to capture location as part of the mandate. They are not collected at any other point of the visit.

## What should I do if I need more help or do not understand how to use the mobile app?

You can attend one of the many trainings Palco is offering or contact our customer service team for support. You can also speak with your Support Coordinator. Contact us or visit our website for more information.



### **Other Questions? Contact Palco!**

Phone: 1-866-710-0456

Fax: 501-821-0045

Email: info@palcofirst.com

**Mail**: Palco, Inc. P.O. Box 242930 <u>Little Rock, AR 72223</u>

WW PALCOFIRST COM

PALCO AUTHENTICARE USER GUIDE ARI PAC

### SELF-DIRECTION

# PALCO



### RECRUITING SELF-DIRECTING EMPLOYEES

Before recruiting, you must know what you want your workers to do. You must consider the work to be performed and the knowledge and skills a person needs to have in order to be able to form that work. A sample job description is included at the end of this section. Finding the right worker was time. How much time depends on your needs and how well you have planned. Use all the resour available to think about whether you want to use friends or family members. Using people you keep can make a process easier, but it can also be tough on your relationships. Recruiting can be divided into the archive.

### WRITING A JOB DESCRIPTION

A well-written job description will help you screen and interview people. It will help you make sure that your potential attendants are comfortable with all aspects of the job. List in the job description the skills and experience you want attendants to have. State other capabilities you want in caregivers, such as physical strength, cooking skills, etc.

### INTERVIEW QUESTIONS

Once you have some responses to your job want to choose people to interview. Interviews be face-to-face meetings where and hov. they will happen. If you do + war. gers coming into your home, consider a p 'ic place's restaurant or library. You may so w co have family member or friend prese. are questions in advance uc ask and br. che job description so they get a good understan 7 of the position.

### M. INC

When you identify some you'd like to hire as an employee an employee and individual know you want to hire him or ner for the job and restate what the job pays. Be sure to have them complete all necessary paperwork as required by Palco and let them know the start date will be set once you ave an official good-to-go from Palco.

### OSTING A DB AD

for your job iting. The proof your pose of a job listing is to identify gople who are both qualified and interested doir anat you need done. A well-written listing can save time up front.

Consider ative ways to post your job ad and attract a most qualified candidates. Location ideas include, corres and hospitals, job service centers, social media, local ablications and newspapers, bulletin boards and word of mouth with family and friends.

# CHECKING REFERENCES

If you wish to proceed with an applicant you've interviewed, you will need to check their references. To check references, call the people listed as references and ask about the applicant. Some good questions you might ask are:

- How do you know the applicant and for how long have you known them?
- Have they worked for you previously and when?
- What are the applicant's strengths?
- What are the applicant's weaknesses?
- Would they rehire this person?

ies?

When you are ready to move forward with the enrollment process, contact Palco and an Enrollment Coordinator will connect with you to make the process as easy and seamless as possible!

# JOB DESCRIPTION Sample

# PALCO

**DUTIES**: The person in this position will assist with activities of daily living. The employer is a 25-year-old man who has a physical disability, lives in his own apartment and uses a wheelchair. Specific activities include assistance with bathing, dressing, personal hygiene, toileting (includes bowel and bladder care), eating, transferring to and from the wheelchair, taking medications and range-of-motion exercises. The position also involves meal preparation, housekeeping, shopping, laundry and other household chores. The position requires a valid Arkansas driver's license, as the attendant will drive the employer's ad d van occasionally

**EDUCATION & EXPERIENCE:** Nothing spatisfic is required, though some expectage in the hold of the reson was a disability is helpful.

### A. Be depended to work the agreed-upon tire

- 1. If you need to abser or a son,
- 2. Please give a min of 48 hours notice for confidence of the other arrangements.
- 3. If you are unable to a on time, call as soon as possible
- early, please r ne ahead to find out if it is acceptable. Ao so.
- 5.Be Jle.
- 6.Be able to work independently

The employer wants to trust you to do your work unsupervised. This means the employer does not want to have to be with you every minute

B. Be observant, moticed, selfstarting and pay attains on to dislate

C. Do not leave work unfib. ad or for someone else to do. Do what your response. by to do.

### D stion hygiene

1. Good ealth boos with leanliness.

Pleas vash you. Is with soap
before nandling kitchen items and
rearing food and after using the
silet, including when you assist the
ployer

ALARY. \$11.25 per hour

**BENEFITS**: This position does not include paid vacation, paid sick time or health insurance, but covers workers' compensation.

**HOURS:** Two hours a day in the early morning, typically 6 to 8 a.m. and some weekend hours

**OTHER REQUIREMENTS:** The person selected must submit to a criminal history check, APS and CPS check.



# SELF-DIRECTION Being an Employer

# D) PALCO

### EMPLOYEE MANAGMENT

As the legal employer of record of your workers, you are responsible for recruiting, hir supervising, evaluating and firing, when necessary, the workers that provide your self-directed port services. Below are some general tips and guidelines for being a good employer. Develor these skills can help you be a good employer and retain employees for a long time. In addition, by a good employer can help keep your employer tax rate low and provide you more usable money.

### SCHEDULING

As the employer, you are responsible for scheduling your workers in accordance with your cash expenditure plan and approved services. Think about the times of day you prefer tasks to be completed and how you like your day to flow. For example, if you enjoy showering in the evening and you need assistance with that task, you should schedule your workers to come that time of day. To prevent over spending, you should have a set schedule for ever worker that aligns with your approved service hou for the two week period.

## PERFORMANCE REVIEWS

Performance reviews are an important part of ensuring your workers he inaful employn. Performance reviews proving value arise and feedback with opportunities rimprove

Come up with categories you will set with them. It is rect mended to review their pormance at time to year.

### TENATION

Unfortunately, at some paragraph you may have to terminate a way good idea to follow some guidelines during unear employment, which will make it easier when you need to let them go. Make sure to document the verbal warnings about issues you have had with them and develop a file of any corrective along plans you have developed to provide them coaching and support.

As soon as you terminate a worker, you should let Palco know right away! This ensures Palco does not issue paychecks to them after they are fired.

### AINING

hoose rker who ady knows you. your i s, and rence they may require less training 1 your spe eds. However, if you hire who doesn't know you, training is ess al in making sure you receive the necessary orts. You are in control of training workers on ur needs, likes and dislikes. In addition to general ing, you should tailor your training to match description. If your workers are going to be a back. I for each other, you will need to train each n all of your needs. Other topics you should sider training on include: orientation to your home, equipment, blood bourne pathogens, HIPAA, lifting and moving, and fraud.

## CORRECTIVE

As with any employment arrangement, you should be evaluating and coaching your workers as issues arrive. This process includes tracking absences, late arrivals and no call/no shows. You should track these items in the workers employee file with dates and details of the occurrences. If a issue persists after coaching has been provided, you may need to develop a corrective action plan that lays out

corrective action plan that lays out steps to correct the behavior and consequences if it is not remedied. The plan should be clearly written timelines for when the issues must be corrected by. It should be signed by both the employer and worker, and stored in the employee's file.

AR SDSR Program, Companions

### SELF-DIRECTION

# PALCO

### **CASH EXPENDITURE PLANS**

The Participant's self-directed budget is authorized by the Department of Human Service. HS) based on a daily dollar amount for services and a total number of hours approved for services. Services are divided into two categories - Personal Care and Attendant Care. You should speak your DHS Nurse about what services you qualify for, based on your needs, and why. Palco can company for service and are approved in the plan by DHS. To help Employers manage their plan and stage which their are also hours and funds, your Palco Support Coordinator will assist you in laying out a Calculate the plan.

### **EXAMPLE**

Participant Name: Jane Doe	400	Palco	12345	
Medicaid ID: JD221212 A Employer Tax R	3.40%	idget En	→ Date:	J1/202(B)
Total Budget for all Services (biweekly total): \$ 1.0	00(C)		400	

	$(D)_{n}$	-	.66	E 3	us	FHours	- 4	Cost of Hours
Personal Care Service:	\$	1	.0.	11.	31	36	\$	409.46
Attendant Care Service	\$	1	50	3 4	891	24	\$	285.38
			100			Total	\$	694.85

- A Froloyer Tax Rate. 's percentuo represents the total amount Palco must addition to the rkers hourly wage for required employer taxes.
- B **ret Effe** re: This is the date DHS has determined your budget car art. P carm y for any services before this date.
- **Tota. Iget for all Services:** This is the total budget your are allocated for 2 weeks, days). Palco cannot pay for any services beyond this dollar amount.
- **loye 'ourly Rate:** This is the amount of pay your worker will be paid. You, as legal employer of record, establish this rate using the Rate of Pay form.
- Re Plus Tax: This is the total amount your employee costs your budget for my hour worked. It is their hourly rate plus your employer tax rate.
- **Hours:** This is the total number of hours approved in your plan of care by your DHS Nurse. Palco cannot pay for any services that exceed your approved hours.
- **Total:** Once all the fields are input, this will populate the total cost of services for a two week period. This amount must be less than your total budget for all services (C).

# SELF-DIRECTION Sudaet Managne

# PALCO

### OTHER GOODS

You have the option to use your funds to purchase other goods and services, which allow you to decrease your need for human assistance and increase your independence. Typically, these items are set up on a recurring basis and must be used in the period for which they are allocated.

Some examples of these goods include home modifications, medical equipment, and communication devices.

### STAYING IN BUDGET

An mentioned above, Palco cannot pay for services the eed the approved authorized amount. This includes funds for services as well as hours. If cheet is submitted or a request made that is be approved amount, Palco will do validation this request and not issue payment. As the le employer of record, you my the ensure your work. paid for all time worked p you schedule your worker a ond to. wed budge and Palco cannot pay, the re posibility the worker is the responsibility "the ployer. re prevent this, was commend yo dule your workers of and monito. Tur spending and utilizatir egularlu.



### SAVING

You have the option to side some your funds to save up for a more expens, rood service if apr by your DHS Nurse. This can cated in the " /ings section of the Case Expenditure You mu this amount combined with your to 're are services d. ot exceed your total buc amount. Palco will co. +he allocated "savings" amount and assic+ ···i+h the p. ent/purchase the approved once t. vings I nce has reached the all amoun eded.

# REVIEWING UTILIZATION

Palco provides self-directing employers access to several reports in the Connect system to assist you with monitoring and managing you utilization in real time. You can view pay stubs, reports and spending summaries that will assist you with tracking all of your spending and allow you to make a decrease or change if you are risking over utilization. For more information on these reports and help with accessing them, speak with your Support Coordinator.

# SELF-DIRECTION Fruad, Waste & Abuse D) PALCO



### OVERVIEW

Fraud, abuse and waste in Medicaid cost states billions of dollars every year, divertir ands that could otherwise be used for legitimate health care services. Not only do fraudule and abusive and potentic harm practices increase the cost of Medicaid without adding value – they increase r nd report all to patients who are exposed. It is everyone's responsibility to protect again suspected instances of fraud waste and abuse.

For more information: https://www.ncsl.org/research/health/medicaid-fraud-ai

### FRAUD

Medicaid fraud occurs when you provide false or untruthful information to claim medical reimbursements, such as false timesheets. Some examples of fraudulent timesheets include requesting payment for time not worked, forging another's signature to the timesheet, or coercing another into giving them part of the payment from Palco even though that person did not work the hours.

Arkansas law (Ark. Code Ann. \$20-77-2505), the federal False Claims Act, and the S Act Anti-Kickback Provision (42 U.S. 7b(b)) all have separate reporting requ. rents when you suspect fraud, waste, and abus. aws impose pend public funds. Each of th for committing the act a. "ing to report the act, even if you did r commic malties range from \$10,000 per dent to prison, or both. In addition, 3 fr ving you an dicaid benefits. om receivi be disg



Wast. ers to c utilizo of services, or practice hat result Jessary costs. Waste also ref to useless coumption or expenditure withe adequate return. For example: Providing ser s that are not medically necessary.

raud, instances of waste should be reported not be tolerated.

### ABUSE

Sometimes a worker, family member, or friend may step over the line and become disrespectful or even abusive to you. If you feel uncomfortable around a worker, family member, or friend because of disrespectful treatment, or if you observe someone taking advantage of you or mistreating you, let someone know about the situation immediately.

In Arkansas, abusing a dependent adult, an elderly person, or a child is a crime punishable by law. Criminal abuse of individuals includes physical or sexual abuse, financial abuse, neglect, and psychological abuse or intimidation. If you are being subjected to any form of abuse, report the situation immediately:

- Adult Protective Services at 1-800-482-8049
- Child Abuse Hotline at 1-800-484-5964
- Emergency Responders at 911
- Palco at 877-753-0999 or 501-604-9936

# SELF-DIRECTION Program Compliance

# ) PALCO

### OVERVIEW

By agreeing to participate in the Long Term Care program, the Participant/Represe we must abide by the program rules and regulations in addition to all State and Federal location that relate to the program. Participation in the program may be terminated by the Departron, c of Human Services if rules are not followed. Your Palco Support Coordinator will help wise you of the less and ensure you are following them. Below are some common topics of Issue and Mc or ing visits.

### HOSPITALIZATIONS

If the Participant enters the hospital or an institution of any kind, self-directed services must stop. Palco cannot pay for any services rendered when a participant is hospitalized. If a time is submitted to Palco during a hospitalization, Palco is required to make a fraud report to the State. In addition, the Participant/Representative, as the legal employer of record may be responsible for the wages owed to their worker.

### BU. ET UNDERUTILIZATION

your o Supper pordition and DHS Nurse and using services of e been authorized for. If you continue to the program of the progr

### BOUNDARIES

It is extremely important in a self-directed program that everyone understands their role and the limitations of that role. As the Participant/
Representative you are responsible for directing and managing your services and supports. While it is nice to have the help of family and friends, it is important you do not let them interfere or fulfill your duties. For example, a worker cannot call Palco on your behalf and get information about your budget or other workers pay. It is important that your Palco Support Coordinator be able to reach YOU, the Participant/
Representative, to have you conversations and relay information so they can easure you are in charge and

understand your role

### RULES ON HIRING CAREGI

The Department of Human rvices wormanages the self-directed parameters on values on values on values a paid cannot be hired as parameters.

- T g are the spouse of the F icipant
- Participar heir he, unless
- They Power of At ney or SSI payee
- They are a DHS repre tative or signer

## ACCESSING REPORTS IN THE CONNECT PORTAL - ARKANSAS



### Types of Connect Reports:

In addition to being Palco's time entry system, the Connect Portal also provider an uable reports for supporting the journey of self-directed services and supports. Two of the reatures respending Summaries and Payment Details. Both of these reports can be a ressed by a ging in to the Connect Portal: https://connect.palcofirst.com/.

Spending Summaries provides quick information to help you easily track your utilianon.

**Payment Detail** provides both the employer and employees with sess to pay stub information and history.

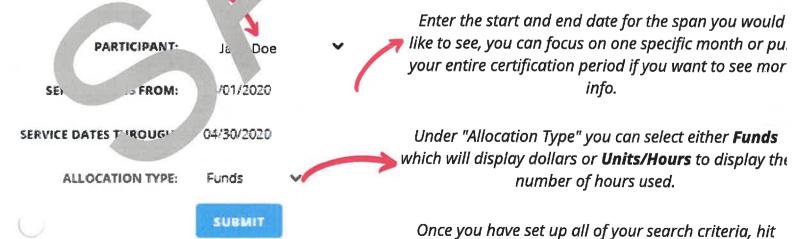
### **Spending**

Spending details are available only to the Tmploy Tc cess, login to Connect and select "Spending" from the tool bar in the top r f the scan.



Once on the spending screen, you content the letails for the date span you would like see.

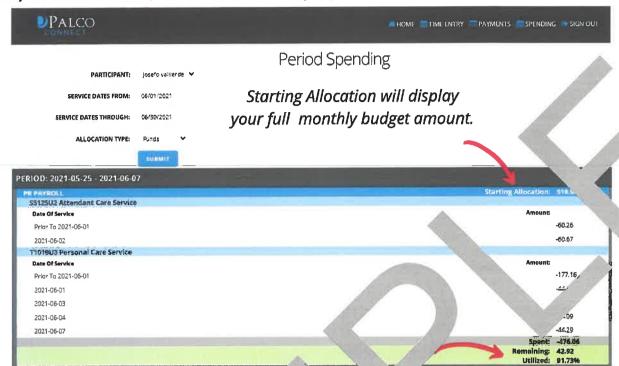
If you are an employ for the participant state of the participant y want to the participant of the participa



Submit.

### **Spending-continued**

Once you click Submit, the details will display.



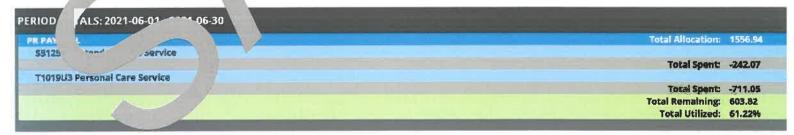
The bottom bar will display the total amc pent and all amount remaining for the month.

You will also see the percent of the but that was utilized.

If you spent more than our allocated adge. a bar will display red. Example:



If you want to see who months of our entire certification period, enter those dates and multiple months will display. So bottom of the results you will see a section called **Period Totals.** This section value of the months within your search criteria and give you a overall bot of spanning.



### **Payments**

Payment details are avaliable to both the Employer and the Employees. To access, login to Sonnect and select "Payments" from the tool bar in the top right of the screen.

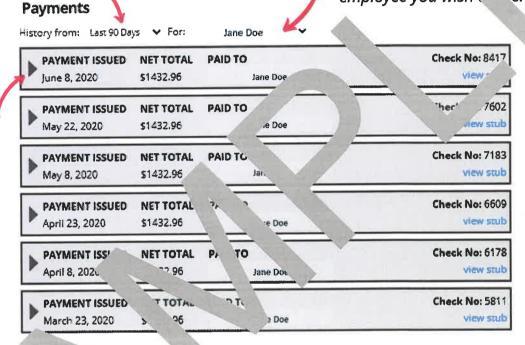


Once on the payment screen there are many options and things you can

Select the time frame for what stubs you would like to see

If you are an emp, r with r ciple employees, you con the employee you wish employee you wish e.

Choose the black triangle on the left to expand the pay stub you would like to see more details on (shown below).



### W in the exp. display more details on the

payment can be seen **Payme** 

NET PAY		\$327.45		
DEDUCTIONS		-\$135.31	-\$1520.68	
\$462.76		\$462.76	\$5658.45	
.ial Care Sen	/ices	\$345.26	\$4213.88	
Atter Care		\$117.50	\$1444.57	
EARNING				
DESCRIP1	1	THIS PAYROLL	YEAR TO DATE	-
PAYMENT I.	₹D	NET TOTAL PAID TO \$327.45 JANE DOE	Check	No: 7025634 view stub

By clicking on tablue "View Stull link, a pop up will open with full stub detail and ability to print.

Questions? Contact Palco! Phone: 1-866-710-0456; Email: info@palcofirst.com

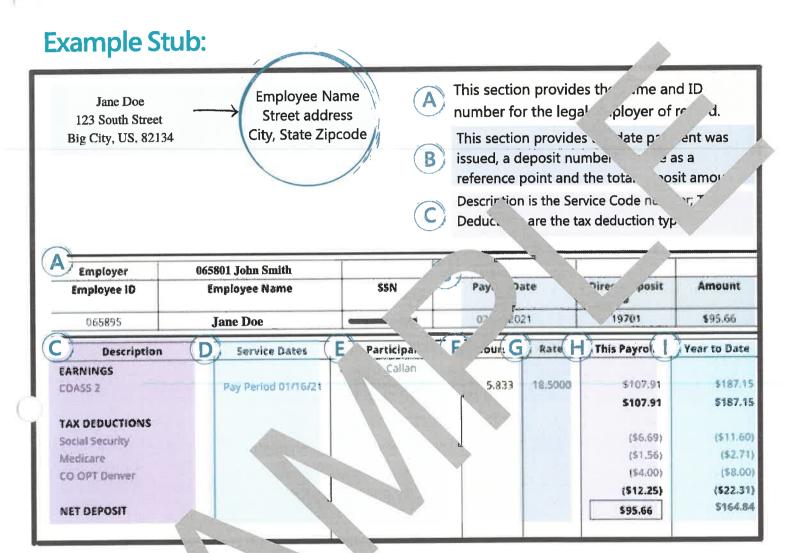
# APPENDIX 5

## EXTRA TOOLS

PAYMENT STUB COMPANION GUIDE HELATH CARE EMERGENCY CARD TEMPLATE BACKUP CARE QUICK DECISION TREE

# Understanding A Worker Paystub





- Service Ites is a pay and worked during this paystub dates.
- Participant presents the person or people who the work is being
  - Hours he total number of hours performed for the corresponding service code c he left.
- the hourly wage the employee is receiving.
- This Payroll is the totals from all Earnings, Deductions, and Deposits for the current payroll
- Year to Date is the Total from all Earnings, Deductions, and Deposits for the current year.

Need More Help? Contact Customer Support toll free.



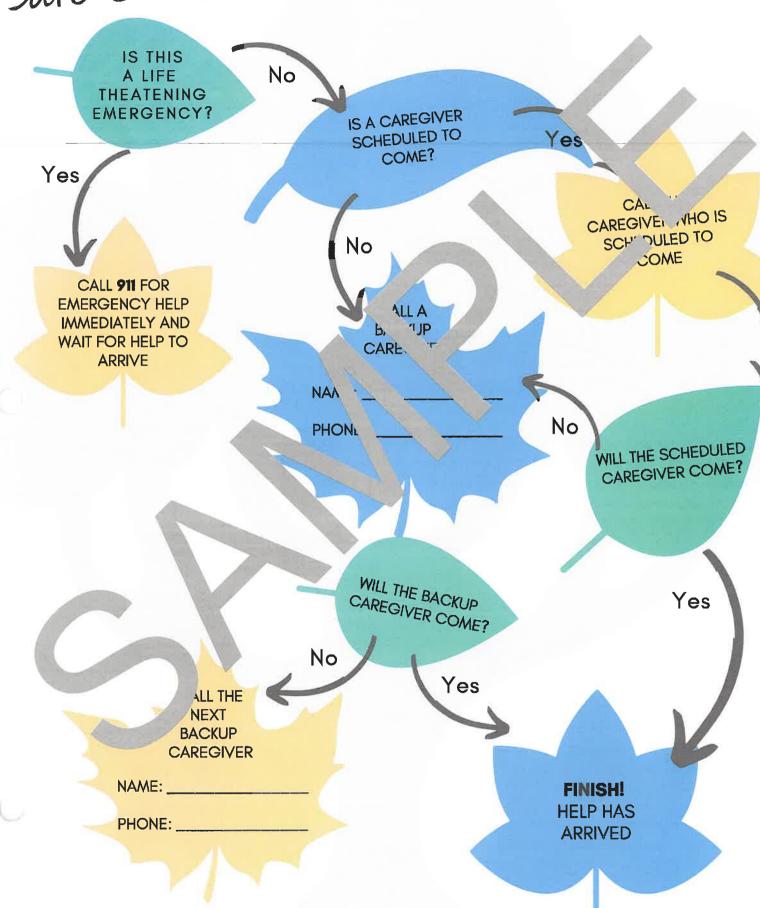


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IDENTIFICATION			
Name			
Address			
Phone 1 Phone 2			
Birth Date/Drivers License #_	se #		
SSNMedicaid ID	d ID		>
PALCO Palco Customer Support 1-866-710-0456	Support Coordinator ame	e e	
	V		
Emergency Contact Name	Emergency Contact 1 e	Relationsh	Relationship to Person
Durable Power of Attorney	_Phone		
Insurance Company	Insurance It 20. #	Contact	
Medical Conditions	812	48 Prescriptions and Dosages	
1,	Ti		
2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2			
4.	4		
Drug Allergies Blood Two	2		
Primary Physician Nar	Hospital	Phone	Fax
PERSONAL INFO Phone Lock Code	Voicema	Voicemail Passcode	
Email Address	Email Password	Computer Login	Login
Other Important Info			

# SELF-DIRECTION Pare Decision Iree





# **APPENDIX 6**

# POST TRAINING ASSESSMENT & EVALUATION



PO Box 242930 Little Rock, AR 72223 Toll Free 866.710.0456

Online: PalcoFirst.com

#### **Post Training Assessment**

This post training assessment will be administered by your Support Coordinator following your initial training to verify your understanding of key concepts and gauge your readiness to perform the employer related functions within the self-directed programs. You must pass with a 75% or higher score to be approved as a self-directing employer.

1. As a self-directing Employer, you are respon	sible for which of the following activities?
A. Acting as the legal employer of record.	<b>B.</b> Recruiting, scheduling, hiring, and managing caregivers of choice.
<b>C.</b> Managing all aspects of the self-directed budget.	<b>D.</b> All of the above
2. Who is responsible for providing reassessme	ents of your care needs?
A. Palco Support Broker	B. Case Manager
C. Department of Human Services	<b>D.</b> All of the above
3. My caregivers are required to use Electronic	
<b>A.</b> True	<b>B.</b> False
4. Who should you contact if you/the Participa	•
A. Palco	B. Case Manager
<b>C.</b> Neighbor	<b>D.</b> Either A or B
5. The Participants legal guardian or spouse ca	nnot be a paid caregiver on this program.
A. True	<b>B.</b> False
6. A Participant cannot live in the home owned by blood or marriage	/rented by the Worker unless they are related
A. True	<b>B.</b> False
7. Abuse includes the following:	
A. Abandonment	B. Sexual Abuse
<b>C.</b> Financial Exploitation	<b>D.</b> All of the above
8. If any type of abuse happens to you, you car	report it immediately to:
A. Palco Support Broker	B. Police Department
<b>C.</b> Case Manager	<b>D.</b> All of the above



•	cted fraud should be reported to the D . True	epartment of Human Services immediately. <b>B.</b> False
	number can be dialed to receive acces	ss to health and human services information? <b>B.</b> 211
C	. 1-855-372-1084	<b>D.</b> 555
	ollowing information should be kept upergency kit:	o to date and on hand as part of your health
A	. Preferred physician and hospital	<b>B.</b> Medication Management Plan
C	Emergency Contact Information	<b>D.</b> All of the above
12. My b		d be reviewed and updated minimally at least
•	Month	B. Year
	. Quarter	<b>D.</b> Never
the prog	-	e than 30 days, they can be disenrolled from <b>B.</b> False
	s service model (F/EA) the Participant c r of record.	or their designated representative is the legal
	. True	<b>B.</b> False
15. Who workers?		and end of year tax statements to your
A	. Palco	<b>B.</b> Case Manager
C	. State of Arkansas	<b>D.</b> All of the above
16. What	is an example of fraud?	
A	. Making a mistake on your mesheet	<b>B.</b> Forging a signature on a timesheet
C	. Turning in paperwork late	<b>D.</b> None of the above





17. What does the self-directed budget pay for <b>A.</b> Personal Care/Attendant Care Employee Wages	or? <b>B.</b> Employer Taxes
C. Other approved goods/services	<b>D.</b> All of the above
18. If the Participant is admitted to the hospit	al, caregivers can still be paid for the services
A. True	B. False
19. If a budget is 14 days, how many pay peri <b>A.</b> 26	ods in a year? <b>B.</b> 12
<b>C.</b> 24	<b>D.</b> 52
20. Budget savings can be used to purchase of Participant to be more independent and rely <b>A.</b> True	only items pre-approved by DHS that assist the less on human assistance. <b>B.</b> False
me on my role as a self-directing employer on	provided by Palco to help certify me and educate the self-directed program. I understand it is my policies set by the State as well as all labor laws.
Employer Name (please print)	
Signature of Employer	Date
Signature of Support Broker	Date



PO Box 242930 Little Rock, AR 72223 Toll Free 866.710.0456

Online: PalcoFirst.com

#### **Post Certification Evaluation**

This evaluation is a confidential document that can be used to rate your experience working with Palco and your process of getting enrolled in the self-directed program.

How would you rate the knowledge of the Palco Support Broker you worked with?								
5. Excellent	<b>4.</b> Above Average	3. Average	2. Poor	1. Very Poor				
How would yo	u rate the tools provide	ed to you by yo	our Palco Suppo	rt Broker?				
5. Excellent	<b>4.</b> Above Average	<b>3.</b> Average	2. Poor	1. Very Poor				
How would yo certification vi	u rate your Support Bro sit?	okers prepared	ness for your en	nployer training /				
<b>5.</b> Excellent	<b>4.</b> Above Average	3. Average	2. Poor	1. Very Poor				
How would you rate your Support Brokers ability to explain complex topics and answer your questions?								
<b>5.</b> Excellent	<b>4.</b> Above Average	3. Average	2. Poor	1. Very Poor				
How would you employer in se	u rate the ease of your lf-direction?	first payroll wi	th Palco and firs	t month as a				
<b>5.</b> Excellent	<b>4.</b> Above Average	3. Average	2. Poor	1. Very Poor				
	u rate your confidence onsibilities are as an er		nding what is ex	pected of you and				
5. Excellent	<b>4.</b> Above Average	3. Average	2. Poor	1. Very Poor				
	outstanding questions on the form follow up from Palc		ould like more t	raining on? (include				
Other Commer	nts:							
Optional:								
Employers Nam	ne & Palco ID (please pri	nt)	Date					

## **APPENDIX 7**

# DISASTER RECOVERY PLAN



### Disaster Recovery Plan

**Privacy and Security** 

October 2022

D)PALCO

FOR INTERNAL LISE ONLY

palcofirst.com | info@palcofirst.com

Version History	2
Disaster Recovery	
Overview	
Disaster Recovery Strategies	
Current Disaster Recovery Procedures	
Cloud Services Disaster Recovery Procedures	
Business Continuity Plan	

### Version History

Version	Date	Author	Description of Changes
1.1	9/1/2016	JL	Creation of Disaster Recovery Plan
1.2	10/1/2019	МВ	Updated with system architecture enhancements
1.3	10/1/2022	МВ	Reviewed and updated Cloud Services Disaster Recovery Procedures

### Disaster Recovery

#### **Overview**

Palco developed this disaster recovery plan (DRP) to be used in the event of a significant disruption to business workflow. The goal of this plan is to outline the key recovery steps to be performed during and after a disruption to return to normal operations as soon as possible.

#### Scope

The scope of this DRP document addresses technical recovery only in the event of a significant disruption.

This disaster recovery plan provides:

- Guidelines for determining plan activation
- Technical response flow and recovery strategy
- Guidelines for recovery procedures
- References to key Business Continuity Plans and technical dependencies (see Appendix A for more information)
- Rollback procedures that will be implemented to return to standard operating state
- Checklists outlining considerations for escalation, incident management, and plan activation

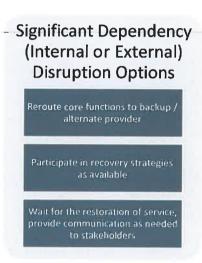
The specific objectives of this disaster recovery plan are to:

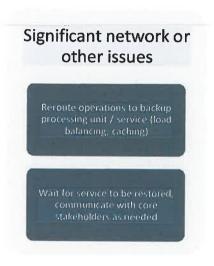
- Immediately mobilize a core group of leaders to assess the technical ramifications of a situation
- Set technical priorities for the recovery team during the recovery period
- Minimize the impact of the disruption to the impacted features and business groups
- Stage the restoration of operations to full processing capabilities
- ✓ Enable rollback operations once the disruption has been resolved if determined appropriate. by the recovery team

### **Disaster Recovery Strategies**

The overall DR strategy of Palco is summarized in the tables below and documented in more detail in the supporting sections.







### **Current Disaster Recovery Procedures**

A disaster recovery event can be broken out into three phases, the response, the resumption, and the restoration. These phases are also managed in parallel with any corresponding business continuity recovery procedures summarized in the business continuity plan.

#### Response Phase: The immediate actions following a significant event.

- On call personnel contacted
- •Decision made around recovery strategies to be taken
- •Full recovery team activated

#### Resumption Phase: Activities necessary to resume services after team has been notified.

- Recovery procedures implemented
- Coordination with other departments executed as needed

#### Restoration Phase: Tasks taken to restore service to previous levels.

- Rollback procedures implemented
- Operations restored

#### Response Phase

The following are the activities, parties, and items necessary for a DR response in this phase. Please note these procedures are the same regardless of the triggering event (e.g. whether caused by a Data Center disruption or other scenario).

### Response Phase Recovery Procedures - All DR Event Scenarios

Step	Owner	Duration	Components
Identify issue, contact on	DR	15	Issue communicated / escalated
call / Designated	TEAM	minutes	Priority set
Responsible Individual			

		4 =	
Identify the team	DR	15	Selection of core team members required for
members needed for	TEAM	minutes	restoration phase from among the following
recovery			groups:
			Operations
Establish a communication	DR	60	Alternate / backup communication tools:
path to coordinate next	TEAM	minutes	email, communicator
steps	or Ops		
Communicate the specific	DR	30	Documentation / tracking of timelines
recovery roles and	TEAM	minutes	and next decisions
determine which recovery			Creation of disaster recovery event
strategy will be pursued.			command center as needed

#### **Resumption Phase**

During the resumption phase, the steps taken to enable recovery will vary based on the type of issue. The procedures for each recovery scenario are summarized below.

Data Center Recovery

Data Center Recovery			
Step	Öwner	Duration	Components
Initiate Failover	DR TEAM	10	<ul> <li>Restoration procedures identified</li> </ul>
		minutes	Risks assessed for each procedure
			Coordination points between groups
			defined
			Issue communication process and
Complete Failover	DR TEAM	1 hour max.	Recovery steps executed, including
			handoffs between key dependencies
Test Recovery	DR TEAM	30	Tests assigned and performed
,		minutes	Results summarized and
			communicated to group
Failover deemed	DR TEAM	5 minutes	Final evaluation
successful			

Coordination of recovery actions is crucial. A timeline is necessary to manage recovery between different groups and layers to reroute critical processes to an alternate site and operate at the level required to sustain operations.

#### **Restoration Phase**

During the restoration phase, the steps taken to enable recovery will vary based on the type of issue. In preparation for such an event, the following tasks are completed on a daily basis:

- a. All server data and software programming files are backed up daily and are stored off-site for a period of 30 days.
- b. All software program disks are stored off-site.

When current software is upgraded, or new software is installed, a backup of any pertinent data are stored at a secure external site. Thus, current and archived files are stored externally in a secure location. All software program disks are stored off-site. Off-site computers are loaded with utilized software. In the event of disaster, off-site computers are activated, data is restored, and business continues with little interruption. In this sense, Palco, Inc. maintains a secondary site for immediate use should a disaster occur to ensure the following:

- Ability to return to operation without interruption of data (RPO is less than 24 hours).
- · Ability to return to operation using appropriate software that is completely updated as of the previous day's work.
- Timely return to operation and production (RTO within 24 hours).
- Capability of the secondary site to meet all the standards required by Palco, Inc. to ensure efficient production of key tasks.

All computers stored off-site are protected by password and other operational integrity mechanisms to ensure proper authorization has been granted for access to computer files. Each employee has a unique identification and password to enter computer workstations and software. Each employee's security level determines their access to computer files.

The procedures for each recovery scenario are summarized below.

### Data Center Recovery

Full Data Center Restoration

Step	Owner	Duration	Components
Determine whether failover to primary Data Center will be pursued	DR TEAM	15 min – 2 hours	Restoration procedures determined
Primary data center restored	DR TEAM	2 hours	Recovery by operationalizing the secondary site. Equipment is powered on. Any backups restored. Critical personnel is given credentials to begin operations.
Complete Failback	DR Team	2 hours	Failback steps executed, including handoffs between key dependencies
Test Failback	DR Team	30 minutes	<ul> <li>Tests assigned and performed</li> <li>Results summarized and communicated to group</li> <li>Issues (if any) communicated to group</li> </ul>
Determine whether failback was successful	DR TEAM	15 minutes	<ul> <li>Declaration of successful failback and communication to stakeholder group.</li> <li>Disaster recovery procedures closed.</li> <li>Results summarized, postmortem performed, and DRP updated (as needed).</li> </ul>

### **Cloud Services Disaster Recovery Procedures**

Disaster recovery process for Palco's cloud services.

- Case Management
- Timesheet Entry Admin
- Financial Management
- Timesheet Entry Mobile Client

Step	Owner	Duration	Components
Track communication and	DR TEAM	As needed	<ul> <li>Operations</li> </ul>
status with the core recovery			
team.			

Send out frequent updates to core stakeholders with the status.	1	As needed	
Inform other teams about technical dependencies	DR TEAM	As needed	Customer Service     Response     Internal Operations

The steps required for Palco to implement GCP cloud failover are as follows:

#### **Full Zone Outage**

- Contact GCP representative for zone status.
- Update GCP-based infrastructure with nearest available zone.
- Ensure automatic restoration of service connectivity.
- After zone becomes available perform zone regression outside normal work hours.

#### **Platform Managed Services Outage**

- Check console for system status.
- Contact GCP representative to report service outage.
- ✓ Work with GCP on resolution. (if zonal issue follow Full Zonal Outage steps to mitigate)

#### **Compute Instance Outage**

- Identify compute instance(s) affected.
- Determine type of failure.
- Restart or re-deploy

#### **Cloud SQL Outage**

- Check console for system status.
- Check for successful automatic failover.
- Contact GCP representative to report service outage. Work with GCP team on resolution.
- ✓ Perform manual failover if necessary.
- ✓ Point-in-time restore from backup if all other options exhausted.

### **Business Continuity Plan**

This plan describes Palco, Inc.'s ability to respond to, work through, and recover from any type of disaster. It includes definitions, as well as processes and procedures that must be followed to ensure successful, efficient, and timely disaster recovery. Each member of senior management and the DRP team has a copy of this plan. The plan is also posted on Palco servers for staff access.

Disasters take many forms and vary in severity. They can be the result of a natural or manmade occurrence. A disaster refers to anything that affects Palco's ability to carry out its normal functions and responsibilities; however, it is the severity of the occurrence that determines when and if Palco activates its business continuity plan (BCP). If a disaster occurs, members of Palco's team will assess the situation and determine if the plan should be activated.

In the event of a disaster, Palco's No.1 priority is preventing the loss of life. Before any secondary measures are taken, Palco will ensure that all employees and other affected individuals are safe and secure. After safety is ensured, Palco will activate the BCP to bring all functions back to normal functioning as quickly as possible. This includes, but may not be limited to:

- Preventing the loss of the organization's resources, such as hardware, data, and physical IT assets.
- Minimizing downtime related to IT.
- Minimizing downtime of the call center.
- Keeping the business running in the event of a disaster.

Palco's plan takes the following areas into consideration:

- Network infrastructure
- Cloud infrastructure
- Telephone systems
- Data storage and backup systems
- · Organizational software systems
- Database systems
- IT documentation

The BCP has been established to ensure that, in the event of a disaster or crisis, personnel will have a clear understanding of who should be contacted.

Each BCP team member is assigned a specific task. The roles and responsibilities of each DRP team member are describe below and are subject to change, based on the type and severity of the disaster. Team members may be asked to perform additional tasks not described in this section.

The Primary Team Leader is responsible for making all decisions related to the disaster recovery efforts. The primary role is to guide the disaster recovery process and other members of the team in their specific roles. All team members will report to the team leader. The team leader's responsibilities include, but are not limited to:

- Determining that a disaster has occurred, as well as assessing its magnitude.
- Setting the plan and related processes into motion.
- Contacting the disaster recovery team per the call tree.
- Determining what systems and processes have been affected by the disaster.
- Determining what first steps need to be taken by the disaster recovery teams.
- Being the single point of contact for and overseeing the disaster recovery team.
- Organizing and chairing regular meetings of the team throughout the disaster.
- Evaluating the state of the disaster continuously and the decisions that need to be made.
- Organizing, supervising, and managing all tests and author all updates.
- Organizing quarterly meetings of the disaster recovery team to review the plan.
- Keeping the disaster recovery team on track with pre-determined expectations and goals.
- Ensuring that all decisions made abide by the plan and policies set by Palco.
- Making decisions that will impact the company. This can include decisions concerning rebuilding of primary facilities and data centers, investing, and upgrading in significant hardware and software infrastructure, and making other financial and business decisions.
- Assessing legal issues related to the disaster.
- Communicating with business partners throughout the disaster recovery process.
- Ensuring that the secondary site is fully functional and secure.

The Backup Team Leader is charged with the following tasks:

- Being a secondary point of contact for the disaster recovery team should the Primary Team Leader be unavailable.
- Keeping a record of money spent during the disaster recovery process.
- Ensuring there is sufficient cash on hand or accessible to deal with small-scale expenses caused by the
- Ensuring sufficient resources are available or accessible to deal with large-scale expenses caused by the disaster.
- Reviewing and approving disaster team members' spending.
- Communicating with banking partners to obtain any materials, such as checks, bank books, etc. that may need to be replaced as a result of the disaster.
- Working with an insurance company in the event of damage, destruction, or losses to any assets owned by Palco and initiating claims and working with carriers to resolve matters concerning the disaster.
- Ensuring that appropriate resources are provisioned to rebuild or repair the main facilities in the event that they are destroyed or damaged.

The Backup Team Leader will assume the role of the Primary Team Leader and all responsibilities thereunder in case the Primary Team Leader is unable to lead.

Because Palco's No. 1 priority is preventing loss of life and ensuring the safety of its employees, the Human Resources member of the disaster recovery team is crucial. The Human Resources member's responsibilities include, but are not limited to:

- Maintaining a list of all employees, their contact information and emergency contact information electronically and off-site.
- Contacting all Palco staff, including the management team, to notify them that the BCP has been activated.
- Communicating with the team leader throughout the activation stage.
- Maintaining communication with employees to constantly relay messages from the team leader.
- Notifying an employee's emergency contact in any case of an employee injury or other incapacitation of the employee.
- Conducting an employee headcount, ensuring that all staff is accounted for and uninjured, immediately after the disaster occurs and at various checkpoints throughout the disaster recovery plan activation and operational restoration processes.
- Ensuring that payroll occurs and that employees are paid as normal, where possible.

The Communications team member will be responsible for all communication during a disaster. This includes communication with state agencies, other organizations, and even the media, if required. These responsibilities include, but are not limited to:

- Communicating the occurrence of a disaster and its impact to authorities, state agencies, company partners, internal parties, clients, and other interested parties.
- Communicating the occurrence of a disaster and the impact of that disaster to media contacts, if required.
- Coordinating with the Team Leader and other team members on appropriate messaging, as needed.
- Notifying the relevant parties once the disaster is over and normal business functionality has been restored.

The Director of Communications will coordinate with the media, working according to guidelines that have been previously approved and issued for dealing with post disaster communications. Only the Director of Communications and her appointed media team is permitted direct contact with the media.

The operations role of the disaster recovery team will determine what steps need to be taken to get the organization back to business as usual. This includes ensuring all aspects of a secondary site meets Palco policy and are maintained appropriately and, providing employees with the tools they need to perform their roles as quickly and efficiently as possible.

The operations team will be tasked with the following:

- Keeping the operational roles of disaster recovery team on track with pre-determined expectations and goals.
- Getting the secondary site ready to restore business operations.

- Ensuring that all departments are running seamlessly as soon as possible.
- Determining what resources are needed, including personnel resources, to achieve operational objectives.
- Creating a detailed report of all the steps undertaken in the disaster recovery process.
- Maintaining lists of all essential supplies that will be required in the event of a disaster and ensuring that these supplies are provisioned appropriately in the event of a disaster.
- Maintaining a log of where all of the supplies and equipment are used.
- Communicating with partners throughout the operational restoration process.
- Ensuring that all decisions made abide by the BCP and policies set by Palco.
- Working with the team leader and information technology and communications team members on understanding the magnitude of the disaster.
- Implementing Palco's policies for setting up a temporary call center and other operational departments at a secondary location.
- Training employees on how to carry out essential functions in a secondary site, as well as on what information to provide parties who are inquiring about the disaster recovery and Palco's response.
- Executing Palco's communication plan as developed by the communications team and the Primary Team Leader.

Each operational department director is required to maintain regular contact with the operations team leader during the recovering process. Each director will have expanded roles for ensuring that the operations are continued as required by our contracts and ongoing business operations. Directors must ensure that staff is able to carry out essential functions as efficiently as possible during recovery. They may delegate non-critical roles to key staff members on their team with the operational team leader's approval.

# Operational Departments Roles and Responsibilities

#### **Financial Services**

- Communicate with financial institutions
- Communicate with relevant taxing and other authorities
- Securing requisite department specific supplies, such as forms, checks, and deposit slips

#### Care Coordination

 Securing requisite department specific supplies, such as program manuals. forms, and other training materials, from the primary site

#### **Customer Support**

- Publishing emergency phone numbers for the call center
- Working with the communications staff to develop a script or outline of information to be released to callers

Technology is the backbone of Palco's operations. During a disaster, the information technology disaster recovery team member is responsible for evaluating all IT related systems, assessing damage and creating a plan for recovery. The role will be primarily responsible for providing baseline network and server functionality and may assist other team members as required. The information technology member's responsibilities include, but are not limited to:

- Assessing damage specific to any network infrastructure.
- Communicating the findings with the team leader and working with the team leader to develop the most efficient course of action.
- Provisioning data and voice network connectivity, including any telephone connections internally and externally.
- Prioritizing the recovery of all IT services in the manner and order that has the least impact on the business, if multiple IT services are impacted.
- Communicating and coordinating with any third parties to ensure recovery of connectivity.
- Migrating IT operations to an alternate site, if required, and ensuring that services are operational in the secondary site.
- Installing and implementing any tools, hardware, software, and systems required, and ensuring that servers are kept up-to-date in a secondary site.
- Installing and implementing any tools, hardware, software, and systems required in the primary site.
- Determining which servers or other IT tools are not working properly at the primary site, if the disaster does not require migration to a secondary site.
- Ensuring that all servers, hardware, software, and other IT tools meet Palco's IT policies.
- Ensuring sufficient spare computers and laptops are on hand so that work is not significantly disrupted in a disaster.
- Ensuring that spare computers and laptops have the required software and patches.

- Ensuring sufficient computer and laptop related supplies such as cables, wireless cards, laptop locks, printers, and other hardware are on hand so that work is not significantly disrupted in a disaster.
- Ensuring that all employees that require access to a computer and other related supplies are provisioned in an appropriate timeframe. If insufficient computers or related supplies are not available, the team will prioritize distribution in the manner and order that has the least business impact.

Regardless of the category that the disaster falls into, dealing with a disaster can be broken down into the following steps:

- 1. Disaster identification/declaration and plan activation
- 2. Staff headcount
- 3. Communicating the disaster and BCP
- 4. Assessment of current damage and prevention of further damage
- 5. Secondary site activation
- 6. Establish IT operations
- 7. Establish primary operations

When a disaster strikes, the BCP team leader evaluates the type, scope, and magnitude of the disaster, and communicates this information to other members of the disaster recovery team. The team leader has the explicit authority to activate the BCP and to what extent the plan is activated.

Once the Team Leader has determined that a disaster had occurred, he or she must officially declare that the company is in an official state of disaster. It's critical during the disaster recovery and business recovery activities that all affected persons and organizations are kept properly informed. Information given to all parties must be accurate and timely. Any estimate of the timing to return to normal working operations should be announced with care. All communication regarding the disaster and Palco's BCP will be provided by the communications team. All such communications should be recorded. Initial communication during the activation process will adhere to the following call tree. At this phase, communications will flow in the first branch (green). Instructions will be given as to when communications should flow to subsequent branches (purple and teal).

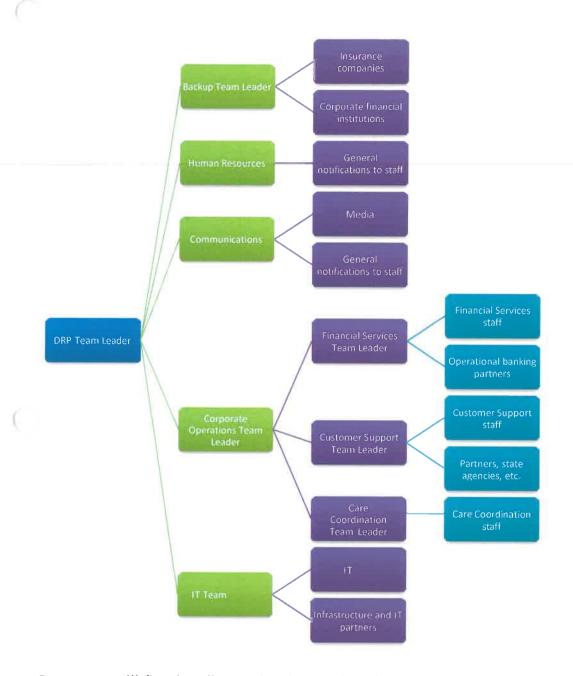
Procedures have been addressed to ensure that communication can be quickly established while activating disaster recovery. However, during the recovery process, certain team members must work together to carry out their designated tasks. The plan relies on key members of management and staff to achieve a smooth technology and business recovery.

All teams will be required to create an initial report on the damage and provide this to the Disaster Recovery Lead within a timeframe set by the team lead of the initial disaster. During each team's review of their relevant areas, they must assess any areas where further damage can be prevented

and take the necessary means to protect company assets. Any necessary repairs or preventative measures must be taken to protect the facilities; these costs must first be approved by the Disaster Recovery Team Lead. The team will assemble to discuss the disaster and next steps to prevent further damage to systems.

The assessment and prevention plan will take on the following course:

- 1. Assessment of impacted systems.
- 2. Determination of the extent of the damage to the system.
- 3. Ranking of importance by criticality to business practices.
- 4. Determine recovery measures to get the impacted systems back to operational status.
- 5. Assignment of team members to recovery of impacted systems.
- 6. Determine other resources needed for recovery of impacted systems.
- 7. Determine the scheduled time to ensure that the impacted system becomes operational at maximum capacity.



Resources will first be allocated to items identified as high priority, then to medium priority, and then to low priority. At the conclusion of the meeting, outstanding items for each team member will be addressed before allowing the staff to begin their BCP tasks. During the meeting, actions will be documented using the format in the grid below.

To ensure that Palco, Inc. can withstand a significant disaster, the company has set up a separate, dedicated secondary site. The secondary site will be formally activated when the Team Leader determines that the nature of the disaster is such that the primary site is no longer sufficiently functional or operational to sustain normal business operations.

Once this determination has been made, the IT and Operations Teams will be commissioned to bring the secondary site to functional status after which the Team Lead will convene a meeting of the various BCP members at the secondary site to assess next steps and ensure that everyone understands appropriate tasks.

Once the BCP is activated, the disaster recovery team leader will establish the scope and severity of the disaster, as well as timeframes for how long the recovery site will be used.

During secondary site activation, the IT team will need to ensure that their responsibilities are carried out quickly and efficiently so as not to negatively impact the other teams. The disaster recovery team, along with the information technology department and all operational departments, will utilize the secondary site until Palco's primary site can be re-established.

Palco, Inc. maintains a cold storage backup for immediate use should a disaster occur to ensure the following:

- Ability to return to operation without interruption of data.
- · Ability to return to operation using appropriate software that is completely updated as of the previous day's work.
- Timely return to operation and production.

All computers stored off-site are protected by password and other operational integrity mechanisms to ensure proper authorization has been granted for access to computer files. Each employee has a unique identification and password to enter computer workstations and software. Each employee's security level determines their access to computer files.

Once IT operations have resumed, normal business operations may be restored effectively. However, the commencement of restoring business operations should not wait for restoration of IT operations. Instead, activities should occur simultaneously.

The team leaders shall prepare an initial assessment of the impact of the incident on the financial affairs of the company. The assessment should include loss of financial documents, revenue, check books, credit cards, cash, equipment, furniture, and fixtures. Banking partners are notified immediately should any critical items be missing. The immediate financial needs of the company must be also addressed. In particular, the following are reviewed:

- Cash flow position.
- Temporary borrowing capability.
- Upcoming payments for taxes, payroll, etc.
- Availability of company credit cards to pay for supplies and services required post-disaster.

This team will be responsible for ensuring that all finances are dealt with in an appropriate and timely manner. The team will ensure that there is money available for necessary expenses that may result from a disaster as well as expenses from normal day-to-day business functions. Finances shall be managed closely during the disaster. Any spending needed to continue business operations are documented.

As part of the company's disaster recovery and business continuity strategies several insurance policies have been put in place. These include general liability and business interruption insurance. When necessary, insurance carriers will be notified, and the claims process will commence. The company internal counsel and outside counsel will jointly review the aftermath of the incident and decide whether there may be legal actions resulting from the event; in particular, the possibility of claims by or against the company.

During the disaster, a regular cadence of meetings will be established. During these meetings, all parties will discuss actions taken thus far and the status of progress on the BCP, including time to full recovery. In addition, the communications team will provide the staff with relevant messaging. All key events that occur during the disaster recovery phase must be recorded. An event log shall be maintained by the disaster recovery Team Leader. This event log should be started at the commencement of the emergency and a copy of the log passed on to other team members once the initial dangers have been controlled. Relevant team members must log all key events until such time as responsibility is handed over to other parties. A log template is shown below.

Business Continuity and Recovery Plan Documentation

Recovery	Person (s) Responsible	Completion Date		Milestones	Other Relevant
Tasks		Estimated	Actual	Identified	Information
(Order of Priority					
1.					
2.					
3.					
4.					
5.					
6.					
7.					

<sup>\*</sup>Note: A priority sequence must be identified although, where possible, activities will be carried out simultaneously.

On completion of the disaster recovery response the Team Leader will prepare a report on the activities undertaken. The report should contain information on the emergency, who was notified and when, action taken by members of the BCP team together with outcomes arising from those

actions. The report will also contain an assessment of the impact to normal business operations. A disaster recovery report will be prepared by the Team Leader on completion of the initial disaster recovery response. In addition to the business recovery team leader, the report will be distributed to senior management. It shall include the following items:

- A description of the emergency or incident
- Those people notified of the emergency (including dates)
- Action taken by members of the disaster recovery team
- Outcomes arising from actions taken
- An assessment of the impact to normal business operations
- Assessment of the effectiveness of the DRP and lessons learned
- Lessons learned

Palco, Inc.'s management team reviews the Business Continuity Plan quarterly, at a minimum, and makes any necessary revisions. Similarly, members of the disaster recovery team meet quarterly to review and discuss the processes outlined in the BCP; the team also makes suggestions to Palco management for any needed modifications at this time.

Palco conducts periodic testing and updating of the Plan for electronic and hard copy files to ensure plan effectiveness. The plan is tested through the following activities:

- 1. Walkthroughs. Team members verbally go through the specific steps as documented in the plan to confirm effectiveness, identify gaps, bottlenecks, or other weaknesses. This test provides the opportunity to review a plan with a larger subset of people, allowing the project manager to draw upon a correspondingly increased pool of knowledge and experiences. Staff should be familiar with procedures, equipment, and offsite facilities (if required).
- 2. Simulations. A disaster is simulated so normal operations will not be interrupted. Hardware, software, personnel, communications, procedures, supplies and forms, documentation, transportation, utilities, and alternate site processing should be thoroughly tested in a simulation test. However, validated checklists can provide a reasonable level of assurance for many of these scenarios. Analyze the output of the previous tests carefully before the proposed simulation to ensure the lessons learned during the previous phases of the cycle have been applied. At least yearly, Palco staff participates in disaster recovery plan exercises, including an evacuation drill of the main facility.
- 3. Parallel Testing. A parallel test can be performed in conjunction with the checklist test or simulation test. Under this scenario, historical transactions, such as the prior business day's transactions are processed against preceding day's backup files at the contingency processing site or hot site. All reports produced at the alternate site for the current business date should agree with those reports produced at the alternate processing site.

4. Full-Interruption Testing. A full interruption test activates the total BCP/DRP. The test is likely to be costly and could disrupt normal operations, and therefore should be approached with caution. The importance of due diligence with respect to previous BCP/DRP phases cannot be overstated.

In the exercises, participants evaluate what needs to be improved and how the improvements can be implemented. The exercises ensure that emergency teams are familiar with their assignments and, more importantly, are confident in their capabilities.

# Compliance

We comply with NIST Special Publication 800-34 Rev. 1 - Contingency Planning Guide for Federal Information Systems and NIST SP 800-66 R1, October 2008 - An Introductory Resource Guide for Implementing the Health Insurance Portability and Accountability Act (HIPAA) Security Rule and the following requirements of the HIPAA Security Rule Standards and Implementation specifications:

- Contingency Plan 45 CFR § 164.308(a)(7)(i)
- Data Backup Plan 45 CFR § 164.308(a)(7)(ii)(A)
- Disaster Recovery Plan 45 CFR§ 164.308(a)(7)(ii)(B)
- Emergency Mode Operation Plan 45 CFR § 164.308(a)(7)(ii)(C)
- Testing and Revision Procedures 45 CFR § 164.308(a)(7)(ii)(D)
- Applications and Data Criticality Analysis § 164.308(a)(7)(ii)(E)
- Facility Access Controls 45 CFR § 164.310(a)(1)
- Contingency Operations 45 CFR § 164.310(a)(2)(i)
- Device and Media Controls 45 CFR § 164.310(d)(1)
- Data Backup and Storage 45 CFR § 164.310(d)(2)(iv)
- Access Control 45 CFR § 164.312(a)(1)
- Emergency Access Procedure 45 CFR §164.312(a)(2)(ii)

# **APPENDIX 8**

# PALCO STAFF RESUMES



# ALICIA PALADINO, CPA, ESQ

BIO

Alicia defines Palco's vision of success, sets the overall company direction and ensures that all operations meet the company's mission and objectives. For over 15 years she has established the efficiencies to help older adults and those with an intellectual or physical disability remain in their homes and communities. As a company strategist, she provides a steady hand in the overall direction of the pany, including offering new ices and adjusting processes to accommodate industry changes. Alicia is an attorney and a CPA with a Master's in Business Administration. In private practice, she specialized in tax, employment law, and Medicaid. As such, she lends her legal and accounting backgrounds to ensure contract and legal compliance in all areas of company functions.



ADDRESS PO Box 242930 Little Rock, AR 72223



**PHONE** 501.604.9936



**EMAIL** alicia@palcofirst.com



**WEBSITE** palcofirst.com

## **EXPERIENCE**

January 2014-Present
Chief Executive Officer • Palco

- Presents information about self-direction to stakeholders and provides advocacy for self-direction nationally.
- · Coordinates contracts with government and agencies.
- Effectively aligns and manages the priorities of the executive management team and their departments.
- Leads and contributes to the development, execution, and achievement of the company's overall growth strategy.
- Builds, cultivates, and manages a customer centric philosophy throughout the organization.
- Responsible for the strategic direction to include positioning the company as a nationally recognized provider in the Fiscal/Employer Agent industry.

January 2009-December 2013 Chief Financial Officer, Internal Counsel • Palco

- Designed operational procedures, including design and implementation of QA/ QI functions and maintenance of Policies & Procedures Manuals.
- Established the accounting infrastructure to support the unique nature of selfdirection within the Generally Accepted Accounting Principles framework.
- Established core internal controls in the payroll and billing functions of the Financial Services area.
- · Compiles financial and reconciliatory reports for interested parties.
- Researched various tax and labor issues related to self-direction, including tax case law, and developed strategies and procedures to implement the findings into core business practices.
- Ensured that the most appropriate financial and non-financial results were being correctly measured and reported to the board of directors.

January 2009-June 2009

Tax Law Advocate • University of Arkansas Income Tax Clinic

- Worked with low-income taxpayers on resolving tax disputes with the IRS and the Arkansas Department of Revenue.
- Negotiated and established Officers in Compromise, penalty abatements, tax payment plans, and other restructuring for clients who live in poverty.
- Obtained Private Letter Rulings on complicated tax matters.
- Maintained a successful track record of reversals of adverse decisions and actions on low-income tax payers.



July 2008-June 2009

Tax Law Clerk/Assistant • Hyden, Miron & Foster, L.L.P.

- Prepared individual, estate, and trust income tax returns on behalf of clients.
- Researched various complex tax, estate and probate issues and communicated findings via legal briefs.
- Served as chief clerk to firm's Tax Legal team.
- Prepared letters to clients and intercompany memoranda regarding various matters based on legal analysis, such as corporate and estate structures based o current Tax Code.
- Performed accounting function for various estates and trusts.

May 2006-July 2008

Public Accountant/Accounting Manager • Paladino & Company, P.A.

- Prepared individual, corporate (e.g., Corporations, Partnerships, LLCs, sole proprietor), estate, and gift federal and state income tax returns and estimated payments.
- Counseled clients on establishing corporations, legal entities and their structurs, and how to establish tax accounts with federal and state agencies.
- Maintained general ledgers for various entities, including large local and nationa businesses, including recording transactions and adjusting entries.
- Produced compiled financial statements and statements of cash flows to clients on a monthly basis.
- · Set up chart of accounts for companies.
- Reconciled bank accounts on a monthly basis on behalf of various businesses.
- Performed all payroll and independent contractor payment functions for dozens of businesses.
- Prepared and filed IRS Forms 941, 940, W-2, W-3, 1099, and 1096, as well as state income tax, unemployment, and franchise tax filings.
- Worked with various tax and labor agencies on resolving client issues with the IRS or with State tax or labor authorities.

May 2004-May 2006

Accountant/Tax Preparer • Jerry Palmer, CPA, L.L.C.

- Prepared individual and corporate income taxes and consulted with clients.
- Maintained general ledgers for various entities, including non-profit organizations and various local and national businesses, including recording transactions and adjusting entries.
- Set up chart of accounts for companies.
- Reconciled bank accounts on a monthly basis on behalf of various businesses.
- Performed all payroll and independent contractor payment functions for dozens of businesses.
- Filed IRS Forms 941, 940, W-2, W-3, 1099, and 1096, as well as state income tax and unemployment tax filings.
- · Prepared client billing and compiled period budgets.
- Performed various functions as a member of the audit team, including designing audit programs and generating audit workpapers.



# **EDUCATION**

University of Arkansas, Little Rock, AR *Juris Doctorate, December 2009* 

University of Arkansas, Little Rock, AR
Masters in Business Administration, Magna Cum Laude, July 2009

Louisiana State University, Baton Rouge, LA Bachelor of Science in Accounting, May 2006

# PROFESSIONAL LICENSURE

- Admitted to Arkansas State Bar, April 2010
- Certified Public Accountant, May 2011

### **MEMBERSHIPS**

- · Arkansas Bar Association
- · American Institute of Public Accountants
- Arkansas Society of Certified Public Accountants

# **PUBLICATIONS**

- Arkansas Real Estate Review, Arkansas Bar Association Case Abstract for City of Dardanelle v. City of Russellville in vol. 1, no. 2, Fall 2008
- Arkansas Real Estate Review, Arkansas Bar Association Case Abstract for Riddle v Udoj in vol. 1, no. 1, Spring 2008



# LARRY PALADINO, CPA

BIO

Larry is a CPA with forty years in both public and private accounting. He is responsible for the preparation of corporate financial records and tests internal controls over program operations. There are architectural leaders in every industry who selflessly offer their expertise. Before there were structured Self-Directed programs, Associations and MCOs' small business owners helped shape the foundation and direction of Madicaid programs. In 1990, Larry's h insight into accounting practices and his moral compass provided the foundation of financial bumpers to the FMS framework. Today Palco relies on Larry daily, for accounting expertise, for leadership, and overall guidance. He provides all oversight of the financial and reconciliatory functions of program operations and ensures that financial aspects of program operations are fully funded and handled responsibly



ADDRESS PO Box 242930 Little Rock, AR 72223



**PHONE** 501.604.9936



**EMAIL** larry@palcofirst.com



**WEBSITE** palcofirst.com

# **EXPERIENCE**

January 2003-Present
Chief Financial Officer • Palco

- Performed all accounting and tax duties associated with self-directed programs for over 4,500 individuals.
- Devises and tracks key budget and financial metrics for executive team to run business and Board to monitor execution and progress against targets.
- Directs financial business of the company, including ensuring accurate and timely preparation of financial statements with supporting documentation.
- Formulates and presents business review packages, including financial, performance measures, strategic budgeting, core metrics and cost drivers.
- Responsible for tax planning, facilitating tax preparation and ensuring timely preparation of tax returns.
- Ensures maintenance of General Ledger transactions, reviewing journal entries and accruals necessary to accurately reflect company activities.

January 1995-Present
President • Paladino & Company, P.A.

- Directly responsible for over 200 clients.
- Day-to-day operations include supervising an accounting firm dealing with all aspects of corporate and individual tax, financial statement preparation, budgeting, payroll, and all other related accounting areas.

November 1989-December 1994 Senior Accountant • Lovett & Foster, Ltd.

- Responsible for corporate and individual income tax preparation.
- Prepared financial reports.
- · Worked with clients on a one-to-one basis regularly.

### **EDUCATION**

University of Arkansas, Little Rock, AR Bachelor of Science in Accounting, 1974



# **PROFESSIONAL LICENSURE**

Certified Public Accountant

# **MEMBERSHIPS**

- American Institute of Public Accountants
- Arkansas Society of Certified Public Accountants



# MARK BIVIANO

BIO

Mark delivers the leadership, management, and vision necessary to ensure that the company has the proper operational controls, administrative and reporting procedures, and people systems in place to effectively grow the organization and to provide financial strength and operational efficiency Mark joined Palco with over 30 years of Information Technology service delivery and management experience, along with 10 years of Legislative experience. are appreciative of Mark's extensive k as a Vice President of Industry Solution at Oracle and SAP along with his days as a Legislator as a member of the Arkansas House of Representatives. His expertise with complex organizations and large-scale projects continues to inform our choices at Palco today. For this program, Mark will ensure that the transition and program implementation plan is followed prior to the operational start date.



**ADDRESS** PO Box 242930 Little Rock, AR 72223



**PHONE** 501.604.9936



**EMAIL** mark@palcofirst.com



**WEBSITE** palcofirst.com

## **EXPERIENCE**

#### 2014-Present

Chief Operating Officer • Palco

- Manages the operational controls, administrative and reporting procedures of the company.
- · Ensures financial strength and operational efficiency.
- Oversees the transitions and program implementation plans.
- · Oversees other departments such as marketing, IT, account managers, and more
- · Collaborates with third-party organizations for strategic partnerships.

#### 2010-2014

State Representative • State of Arkansas

- Served on Committee on Insurance and Commerce, Committee on Public Health and Committee on Revenue and Taxation.
- Sponsor of legislation to set up Healthcare Private Option in Arkansas. An innovative approach to expanding Medicaid population into the private sector.
- Lead sponsor on legislation to establish not-for-profit state insurance exchange.

#### 2006-2010

Vice President • SAP\_Walldorf

- Responsible for industry leadership and management in the development, design and deployment of healthcare solutions, including industry requirements, partne strategy, and go-to-market plans.
- Served as the industry business unit's senior healthcare executive, driving all sale enablement and marketing programs, strategy, customer programs, thought leadership, press and analyst activities.

#### 2006-2010

Vice President • Oracle Corporation – Reston, VA

- Responsible for the strategic health initiatives and the expansion of the Oracle vertical model to the US Health Market
- Managed a team of healthcare professionals in support of all Oracle healthcare strategies and sales support activities for application and technology products.



# **EDUCATION**

University of Arkansas Bachelor of Science in Finance, 1981

# **MEMBERSHIPS**

- American College of Healthcare Executives
- Healthcare Financial Management Association
- Healthcare Information Management Systems Society
- Center for Healthcare Information Management Executive



# JEFF LEIS

#### BIO

leff oversees the network administration, help desk and support operations, development, testing, and integration, and IT strategy of the corporation. He lends his years of expertise to ensuring that Palco is at the forefront of technological advances in the health care industry His department is responsible for maintaining our infrastructure support our transactions, provide disaster recovery, protect confidential rmation, and deploy and maintain Palco solutions. Prior to joining Palco, Jeff led a team of developers in the design and development of Medicaid billing software for an international company who is a leader in software development. Jeff was also a member of a development team and network team responsible for supporting Walmart stores



ADDRESS PO Box 242930 Little Rock, AR 72223



**PHONE** 501.604.9936



**EMAIL** jeff@palcofirst.com



**WEBSITE** palcofirst.com

## **EXPERIENCE**

# 2010-Present

Chief Technology Officer • Palco

- Designed and built MS SQL SERVER database for accounting firm.
- Created custom XAML/WPF VB.NET program (PalPro) which uses custom SQL database for full payroll, reporting, and change tracking purposes.
- Designed and implemented digital fax filing software to allow for paperless record management system.
- Maintain design and functionality of company website (www.palcofirst.com).
- Directed architecture and integration of current cloud-based software platform and infrastructure.
- Worked with third-party vendors to achieve seamless transfer of data between large database systems.
- Developed cloud-based databases and schema to support tracking of critical data points over time.
- Streamlined claim billing processes to reduce overhead, complexity, and time to completion.
- Ensured internal processes are kept up-to-date with the most current and applicable technologies.
- Automated internal processes to increase productivity and accuracy.

#### 2010-2011

Software Developer • MedEvolve

- Delphi programmer assisted with the development of retail medical billing and scheduling software.
- Maintained SQL database scripts for numerous programming requirements.
- · Assisted individual clients with support and reporting needs.

#### 2007-2010

HelpDesk Technician/Programmer • Benchmark Group

- Designed & wrote software using Visual Studio 2008, VB.NET, C#, & C++.
- · Wrote technical manuals to assist with daily functions.
- Updated MS Office VBA scripts to new VB.NET add-in format for various software titles



2006-2007

Sound/Lighting Director/Web Design • Digital World Productions

- Operated and installed sound and lighting equipment for concerts and other large media events across the region.
- Expanded company website and enhanced functionality using Flash, HTML, and variety of other design software.
- Involved with the proper functioning and maintenance of multiple sound and lighting setups, including the use of specialized computer software and hardwar configurations.

# **EDUCATION**

University Arkansas Bachelor of Arts in Computer Science, 2007

# PROFESSIONAL EXPERIENCE

• Experienced with network infrastructure and hardware to support a business' growing technical needs.



# DR. VICTORIA EVANS

BIO

Victoria is a health policy professional with 10 years of Medicaid policy and programmatic experience including 4 years of experience with home and community based programs and selfdirection programs. She has served in both the public and private sector, in a variety of leadership, operations management, and research and policy development roles. She earned a Doctorate in Public Health Leadership from the University of Arkansas far Madical Sciences' Fay W. Boozman ege of Public Health in 2012. Her FMS experience includes stakeholder engagement, client relations. operations management, program development and implementation.



ADDRESS PO Box 242930 Little Rock, AR 72223



**PHONE** 501.604.9936



**EMAIL** victoria.evans @palcofirst.com



**WEBSITE** palcofirst.com

## **EXPERIENCE**

2020-Present

Senior Director of Client Engagement • Palco

- Provide leadership, project management, and writing support for all business units, supporting various state Medicaid and Veterans Administration contacts.
- Serve as the primary technical writer for contract deliverables and internal business partner needs including operations manuals, policies and procedures, and new solicitations and proposals.
- Serve in a leadership capacity for stakeholder engagement, client relations, operations management, and program development and implementation.
- Manage resources, schedules, and financials of full project life cycle.
- Management of issues, risks and project change requests to ensure successful and on-time project delivery.
- Contribute to process improvement initiatives on improving project delivery.
- Manage a portfolio of complex initiatives that span one or multiple lines of business.

#### 2019-2020

Director of Policy & Research, Govt. Programs • eQHealth Solutions

- Provided leadership, project management, and writing support for the Government Programs unit supporting various state Medicaid contracts.
- Served as the primary technical writer for contract deliverables and internal business partner needs including operations manuals, policies and procedures, and new solicitations and proposals.
- · Initiated a pipeline of work, meeting self-imposed and contractual deadlines timely

#### 2017-2019

Deputy Director • Arkansas Dept. of Human Services – Division of Provider Services & Quality Assurance

- Served in a leadership capacity, providing direction and administrative oversight in the day-to-day operations of the Office of Long-Term care, Community Services Licensure and Certification section and the Quality Assurance, Provider Engagement, and Workforce section within DPSQA.
- Provided professional-level support the DPSQA Director, through strategic planning, analysis, technical writing, and communication with internal and external stakeholders.
- Assisted the DPSQA Director with assessing and monitoring division needs and priorities to include reviewing current processes to reduce duplication and manual processes and create greater automation and efficiency.



### **EDUCATION**

University Arkansas for Medical Sciences, Little Rock, AR Doctor of Public Health in Public Health Leadership, 2012

University Arkansas for Medical Sciences, Little Rock, AR *Master of Public Health, Epidemiology, 2005* 

University of Central Arkansas, Conway, AR Bachelor of Science, Medical Sociology, 2002

### PROFESSIONAL SERVICE

- Applied Self Direction Policy Workgroup (member, 2022)
- Applied Self Direction FMS Membership Steering Committee (member, 2020-2021)
- American Public Health Association Maternal & Child Health Section (reviewer, 2009-2015)
- Undergraduate Education for Public Health Summit (reviewer, 2013-2015)
- Editorial board for the Above the Line Project Journal (2013-2015)

### **MEMBERSHIPS**

- Delta Omega Honorary Society in Public Health, Beta Delta chapter (inducted May 2011)
- Alpha Kappa Delta National Sociology Honor Society (inducted May 2002)

# **PUBLICATION**

 Cardenas VM, Evans VL, Balamurugan A, Faramawi MF, Delongchamp RR, Wheeler, JG. (2016). Use of electronic nicotine delivery systems and recent initiation of smoking by US children. International Journal of Public Health. Advance online publication. doi: 10.1007/s00038-015-0783-7.



# **TONI ROSE**

#### BIO

Toni manages the call center and other functions related to client communications. She routinely performs quality assurance measures to monitor our service level, taking care to exceed industry standards for caller hold times, speed-to-answer metrics, and handle/resolution times. Her staff performs a variety of activities, such as receiving inbound calls, conducting eligibility pre-screening for applicants interested in program enrollment, ing outbound calls, and providing support activities.



ADDRESS PO Box 242930 Little Rock, AR 72223



**PHONE** 501.604.9936



**EMAIL** toni.rose @palcofirst.com



**WEBSITE** palcofirst.com

### **EXPERIENCE**

#### 2018-Present

Director of Customer Service • Palco

- Responsible for call center operations including call center performance and account manager effectiveness.
- Track ongoing call volume and work levels within the call center.
- · Create detailed improvement plans, policies, and protocols.
- · Ensure PHI/HIPAA guidelines are followed.

#### 2007-2018

Manager • Cardinal Health

- Responsible for team of 28 customer service representatives that supported & serviced Veteran Affairs Government & Department of Defense accounts.
- Accountable for fostering continuous improvement and cultivating a culture where everyone's job is to improve their job.
- Demonstrated aptitude for calculated risk taking & bias of action over theory.
- Created an Enterprise Support Services team which took a consultative approach to identify areas of opportunity through projects that enhanced service experiences.
- Delivered results on foundation needs; meeting service level and delivering excellent quality.

#### 2005-2007

Insurance Agent • Colonial Supplemental Insurance

- Opened and enrolled 9+ companies.
- Maintained, traveled, and sold business to State of Arkansas employees.
- Exceeded first year sales to over \$100,000, tier-5 sales level goal.

#### 2004-2005

Branch Manager • Kelly Educational Services, Inc.

- · Managed the office and staff in day-to-day activities.
- Trained and developed substitute teachers.



1989-2004

Payroll Supervisor • ALLTEL Corporation, Inc.

- Supervised and lead Service Center helpdesk for accounting applications.
- Developed written processes and negotiated to resolve procedural issues with other groups.
- · Analyzed and reported statistical data that reflected performance.
- · Arranged and facilitated system training.
- Problem solved and troubleshot ticket issues.

# **EDUCATION**

Rockhurst University Continuing Education Center, Inc. 2007-2013

University Arkansas at Little Rock, Little Rock, AR Majoring in Business/Accounting, 1992-1994

Pulaski Vo-Tech, Little Rock, AR 1988-1989

# **ACHIEVEMENTS**

- Lead and Orchestrated the Palco Call Center through multiple implementations of EVV in 2021.
- Recipient of the Customer Service Site Excellence in Customer Service Award in 2009.
- Implemented and supervised a new team of agents for the National Rehabilitation Business (Select Medical \$51.1M and HealthSouth \$15.7M).
- Process Steering Committee Leader for the Service Center 2012/2014.
- · Certified in Lean Six Transformation Training.
- Healthy Lifestyles Site Champion. Organized and implemented an onsite Fitness within 70,000 square foot facility.
- Implemented the Call Center from a CISCO Platform to the GOTO Platform in 2021.



# PAULA SOLL

#### BIO

Paula has been with Palco for 2 years and brings over 26 years of experience in Medicaid Billing. Paula is extremely knowledgeable in processing claims and medical authorizations. As a Program Specialist/Claims Examiner for the Montana Department of Health and Human Services, she assisted with developing and coordinating a multistate steam on a new Claims Module RFP and Data Governance Module. In addition to her tenure at MDHHS, Paula nt 18 years at Xerox/Conduent/ nizant where she worked as a Claims Supervisor and Business Analyst. Paula will lead the claims and billing team to fulfill the program requirements. She will dedicate three (3) Billing and Claim Specialists to this project.



ADDRESS PO Box 242930 Little Rock, AR 72223



**PHONE** 501.604.9936



**EMAIL** paula.soll @palcofirst.com



**WEBSITE** palcofirst.com

## **EXPERIENCE**

# 2020-Present

Billing Manager • Palco

- · Manages the Claims Department.
- · Oversees processing of all claims submissions.
  - · Monthly claims count of approximately 45K.
- Oversees processing of all reconciliations to report to GL.
- Supervises, directs, monitors, counsels, and evaluates supervisory staff to ensure performance standards are maintained.
  - Establish and maintain metrics to effectively report outcomes to upper management.
  - Establish and update uniform policies to effectively manage various situations

#### 2019-2020

Claims Director • Consumer Direct Care Network

- Managed the Claims Department, which consists of three divisions: Data Entry, Authorizations, and Billing.
- · Oversaw processing of all authorizations and claims submissions.
- Monthly authorization counts of approximately 5K-6K.
- Monthly claims count of approximately 450K.
- Supervised, directed, monitored, counseled, and evaluated supervisory staff to ensure performance standards were maintained.
- Established and maintained metrics to effectively report outcomes to upper management.
- Established and updated uniform policies to effectively manage various situations.

#### 2015-2019

Program Specialist & Claims Examiner • State of Montana/DPHHS

- Oversaw the development of health education and outreach materials.
- Responded to inquiries concerning programs Community First Choice (CFC), Big Sky Waiver (BSW) formerly known as HCBS, Hospice, Home Health.
- Excellent organizational skills, including ability to multitask and perform tasks at all levels.
- Ability to provide effective customer relations.
- · Excellent verbal and written communication skills.
- Served as a subject matter expert to others in the Division.



#### 2011-2015

# Business Analyst • Xerox/Conduent/Cognizant

- Operational development of new Enterprise MMIS system as the fiscal agent for Claims/TPS/Resolution Departments.
- Analyze current MMIS system, identify gaps and develop solutions to improve efficiency.
- Conduct JAD sessions, perform UAT testing and smoke testing on the Enterprise MMIS system and any deployments.
- Requirements gathering, designing and development of business rules for claim processing, and security.
- · Ensure system functionality and client requirements are met.
- Maintain SLA (service level agreements) levels for clients.

#### 2004-2011

# Claims Supervisor • Xerox/Conduent/Cognizant

- Assisted Claims Manager in all aspects and functions of the Claims Department.
- Supervised Document Control Dept., Claims Exam Entry Dept, Claim Resolution Dept and the Regional OCR Claims Processing Hub with over 20 reporting staff.
- Implement OCR Claims Processing Hub with new states within Xerox.
- Develop and maintain business rules for claims processing for all states participating within the Regional Hub.
- Technical documentation of system, develop and modify desk level procedures and operational processes.
- Troubleshoot issues with claims processing and OCR issues.
- Conduct JAD sessions, write new business rules, perform UAT testing and assess possible impacts from changes system wide.
- Maintain SLA (service level agreements) levels for client and OCR Claims Processing Hub
- Use of multiple proprietary software programs.

#### PROFESSIONAL EXPERIENCE

- 20 Years of Medicaid Billing Experience
  - MMIS Applications and Subject Matter Expert Areas: Claims, TPL, Resolution Document Control, Service Authorizations, CHIMES.



# LEXI HARRIS, MHA

#### BIO

Lexi has 20 plus years serving vulnerable populations with 12 years in Self-Direction working with programs across the country. Lexi earned a Bachelor's in Sociology from St. Leo University and a Master's in Health Care Administration and Gerontology from the University of Phoenix. She has been with Palco for over 2 years working and assisting with different projects including but not limited to Spanish Training for our members and she is responsible for all of Arkansas' Support Coordination. currently oversees 20 dedicated Enrollment/Support Coordinators Lexi's responsibilities in West Virginia will oversee the implementation of Resource Consulting Brokerage in West Virginia. She will have an integral part in Resource Consulting staff recruitment, hiring, and training new team members in West Virginia's program rules and procedures.



ADDRESS PO Box 242930 Little Rock, AR 72223



**PHONE** 501.604.9936



**EMAIL** lexi.harris @palcofirst.com



**WEBSITE** palcofirst.com

# **EXPERIENCE**

#### 2019-Present

State Director of Resource Consulting Brokerage • Palco

- Responsible for day-to-day Support Coordination Operations.
- Manages Support Coordinators in Arkansas' 3 Regions.
- Monitors enrollments for quality assurance.
- Responsible for hiring, training, and coaching staff members.
- Monitors Federal, State Compliance rules and Program requirements.

#### 2015-2019

State Director • Consumer Direct Care Network

- Responsible for day-to-day Support Coordination Operations.
- Maintain continuous service quality, monitoring compliance with regulations, and improve the economic standing.
- Effectively communicate across all lines of business in all methods provided.
- · Responsible for hiring, training, and coaching staff members.

#### 2010-1015

Care Coordinator • United Healthcare Community and State

- Provided initial orientation to office policies and procedures.
- Maintained all employees' records to state standards pertaining to licensure, certifications, and mandated trainings.
- Created and facilitated all facets of training for new companion and home health aides.

#### **EDUCATION**

University of Phoenix Central Florida

Master's in Health Care Administration/Gerontology

Saint Leo University Bachelor of Arts in Sociology



# **TAYLOR JOHNSON**

#### BIO

Taylor has been with Palco for more than 3 years, serving as the lead payroll processor for Pennsylvania. He attended the University of Central Arkansas and earned his bachelor's degree in History. Taylor manages the payroll and invoice payment process from timesheet entry to the actual payment of SSPs/DCWs and vendors. He is responsible for monitoring the influx of timesheets and payment requests through the EVV mobile app, the portal, fax, email, and assigning continual resources, if needed, to meet the submission and payment deadlines.



ADDRESS PO Box 242930 Little Rock, AR 72223



**PHONE** 501.604.9936



**EMAIL** taylor.johnson @palcofirst.com



**WEBSITE** palcofirst.com

# **EXPERIENCE**

#### 2021-Present

Payroll Manager • Palco

- Supervise payroll processors to ensure they have a proper understanding of payroll processes.
- Work with the development team to implement changes to our systems.
- QA payroll and system processes.
- · Recruit and train new payroll processors.

#### 2015-2019

**Processing Specialist • Palco** 

- · Processed payroll timesheets.
- Responsible for tax payments and garnishments.
- · Performed bank reconciliation.
- Monitored payroll validations and budget checks.

#### 2019-2020

**Data Entry Specialist • Palco** 

- Entered Timesheets and payable items into the system.
- · Monitored timesheet files, documents, and assigned to appropriate departments

#### 2019-2020

Property Manager • Twin City Properties/Affordable Granite and More

- Posted income and expenses in Excel registries.
- · Paid expenses and created payroll.
- Balanced registries.
- Supervised project timelines and contract workers.
- · Inspected properties.
- · Provided company helpdesk support.

#### **EDUCATION**

University of Central Arkansas, Conway, AR Bachelor of Science in History



# **CODY WAITS**

#### BIO

As the Enrollment Services and Training Manager, Cody monitors and oversees the enrollment of participants, employers, and workers for this program. He ensures that paperwork is completed timely and accurately, all required checks are run on workers, and that the employer is properly enrolled with the IRS and the District of Columbia as an employer of record. Cody is also responsible for establishing accounts for which Palco staff will deposit and pay payroll s. He reviews not only paper forms. but those that are completed online, through a series of daily reporting and progress checks. Cody provides training on F/EA enrollment and payroll processing procedures to participants. employers, and workers. He is also in charge of presenting routine webinars and training for state and agency personnel on program operations.



ADDRESS PO Box 242930 Little Rock, AR 72223



**PHONE** 501.604.9936



**EMAIL** cody.waits @palcofirst.com



**WEBSITE** palcofirst.com

# **EXPERIENCE**

#### 2021-Present

**Enrollment Services and Training Manager • Palco** 

- · Supervise Enrollment Department for all programs.
- · Develop new enrollment forms.
- · Review department Quality Assurance with regular audits.
- Provide internal and external support for all training and communication.
- · Provide system demos to clients and users.
- · Create marketing material, training guides, resources, and recordings.

#### 2018-2021

#### Account Manager • Palco

- Responsible for overseeing consumer-directed programs in Kansas & Nevada.
- Assist in reviewing & developing program policies, procedures, & materials.
- · Research issues creating, suggesting, and coordinating timely solutions.
- Provide regular and consistent process feedback and evaluation to management in the interest of improving overall delivery of services.
- Effectively communicate across all lines of business in all methods provided.

#### 2016-2018

Director of Selection and Development • Northwestern Mutual

- · Recruited financial advisors for the district office.
- Interviewed full-time and intern candidates through talent selection process.
- Created referral culture in office getting referrals from advisors.
- Trained and mentored interns to become full-time financial advisors.
- Recruited interns from central Arkansas colleges and universities.
- Presented at career fairs throughout the state of Arkansas.

#### 2015-2016

Promotions Director • Salem Media Group

- Planned and executed promotional events.
- Built and executed marketing plans that identify strong prospects to initiate sales opportunities – trade shows, pop-up events, on-location radio remotes.
- · Planned promotional events and presented reviews of results to upper management.

#### **EDUCATION**

Harding University, Searcy, AR Bachelor of Arts in Public Relations, 2009



# AMELIA WEGLEWSKI, CPA

BIO

Amelia monitors quality metrics to ensure that we are meeting contract and company standards. She has experience reviewing person-centered plans, consulting with community and health professionals, comparing requested services budaets. and pre-authorizations. issuing clarifications, or denials of services. She has worked in this industry for years and in accounting prior. She reviews client interactions daily to find areas improvement or clarification and dules appropriate resolutions and technical assistance. Amelia helps by continually improving our processes and offering enhanced services to our dients. She also performs quality assurance to ensure accuracy and completeness of all processes.



ADDRESS PO Box 242930 Little Rock, AR 72223



**PHONE** 501.604.9936



**EMAIL** amelia@palcofirst.com



**WEBSITE** palcofirst.com

### **EXPERIENCE**

2016-Present

Senior Director of Project Management and Data Analyst • Palco

- Responsible for ensuring Palco meets fundamental responsibility to clients of accurate and timely payments, billing, and withholding for programs.
- Responsible for other departmental activities, including processing enrollment paperwork, warehousing, and disbursing a variety of forms.
- Provides expertise in developing and recommending changes to existing corporate policy to increase the accuracy, efficiency, and responsiveness of the Financial Services Department.

2015-2016

Assistant Controller • Wilson and Associates, PLLC

- Responsible for the direct oversight of financial operations of company and all entities ensuring timely and accurate financial information is made available to the CFO and the management team.
- Worked under guidance of CFO, preparing & reporting financial statements conforming to principles of accounting & regulatory requirements.

2012-2015

Senior Audit Associate II • BDK, LLP

- Performed and conducted audit, review, and attest services for financial statements, operations, internal controls, and process compliance for private companies ranging in size from 10K to over 150B in revenues.
- Prepared, examined, & analyzed accounting records, financial statements, & reports to ensure accuracy & conformance to reporting standards.

#### **EDUCATION**

Hendrix College, Conway, AR Master's in Accounting, 2012

Hendrix College, Conway, AR Bachelor of Science in Business Administration, 2012



# **PROFESSIONAL LICENSURE**

Certified Public Accountant

# **MEMBERSHIPS**

- American Institute of Certified Public Accountants
- Arkansas Society of Certified Public Accountants



# KADY PREDOTA

BIO

Kady has over 10 years in Self-Direction working with programs of all sizes across the country. She began her career working to improve the care of individuals with a developmental disability. She is a certified trainer for person centered planning. Her FMS experience includes management of service delivery, billing, accounts payable, payroll, and program transition, implementation, operations. During the implementation se, Kady will ensure that Palco milestone activities and communicates continually with program administrators to ensure that our work meets their needs.



ADDRESS PO Box 242930 Little Rock, AR 72223



**PHONE** 501.604.9936



**EMAIL** kady.predota @palcofirst.com



**WEBSITE** palcofirst.com

# **EXPERIENCE**

2019-Present

Senior Director of Operations • Palco

- Develop and leverage internal and external partnerships and network to maximize the achievement of long-term business goals.
- Provide overall direction and management of Account Management and Enrollment departments.
- Develop company processes and guidance for best practices utilizing national standards and successful outcomes.
- Research issues and coordinate with all departments to affect a solution.
- Work with key stakeholders to create and maintain integrated plans and budgets and ensure plans are progressing according to timing and budget expectations.

2015-2019

State Director • Consumer Direct Care Network Colorado

- Managed all aspects of the training and operations for Consumer Direct programs across the entire state of Colorado.
- Worked closely with the Department of Health Care Policy and Financing to implement rules and execute program changes.
- Developed and oversaw training curriculum and implementation.

2012-2015

Case Manager • Colorado Access – Long Term Care

- Provided case management services to individuals on long term care Medicaid waivers, specialized in waivers such as brain injury, spinal cord injury and elderly, blind and disabled.
- · Completed high-level assessments of client needs to determine eligibility.
- Internal case manager board president.

#### **EDUCATION**

Metro State University, Denver, CO Bachelor of Science in Human Services, 2012

# PROFESSIONAL EXPERIENCE

Person Centered Thinking Trainer, National Certification, 2018-present.



# STEPHANIE GALLAGHER

#### BIO

Stephanie has 15 years of experience in FMS payroll and processing administration. Stephanie oversees the entire payroll and payment process from timesheet or payment request submission to actual payment to workers or vendors. She is responsible for monitoring the influx of timesheets payment requests through the online portal, fax, email, and mail around payday and assigning additional resources, if needed, to the submission deadlines errors are corrected and a prepayroll is generated and sent to the quality assurance team for review and checks. Once approved, payments are sent, taxes are filed, and appropriate postings (e.g. payments and journal entries) are made to our general and subsidiary ledgers by the Payroll and Invoice Manager



# ADDRESS PO Box 242930 Little Rock, AR 72223



**PHONE** 501.604.9936



**EMAIL** stephanie.gallagher @palcofirst.com



**WEBSITE** palcofirst.com

# **EXPERIENCE**

## 2021-Present F/EA Director • Palco

- Directs all aspects of payroll processing and tax reporting.
- Establishes and oversees payroll processes and procedures.
- Designs short-term and long-term strategies to achieve continuous improvement and efficiencies in payroll processing and delivery operations.
- Keeps stakeholders informed about the status of payroll laws and regulations.
   Develops implementation plans for required changes to operations.
- Review and approve all quarterly and year-end filings.

#### 2020-2021

# Payroll Manager • Palco

- · Managed the payroll and data entry departments.
- Managed payroll operations and processes.
- Reviewed payroll processing to ensure timely and accurate processing.
- · Ensured federal, state, and local compliance.
- Maintained payroll staff by selecting, orienting, and training employees.
- Oversaw and reviewed payroll payments and account reconciliations.
- Managed and resolved any issues related to payroll.

### 2018-2020

# Payroll Manager • Consumer Direct Care Network

- Managed \$500 million in payroll and tax operations.
- · Ensured accurate and timely bi-weekly payrolls.
- Managed day-to-day operations and supervised 12 team members.
- Processed 49,000 W-2s for 9,000+ employers.

#### 2014-2018

# Payroll Supervisor • Consumer Direct Care Network

- Oversaw the payroll team in processing payroll for 22,000 caregivers.
- Supervised procedural analysis and process efficiency to maximize efficacy.
- Developed and implemented payroll procedural changes.

# **EDUCATION**

Hellgate High School CCP Certification, 2017/Certified Payroll Professional



# MIKE BROWER, MACC

BIO

Mike leads a team of developers and software engineers in the development and integration of new software and technologies to support the services we provide. In this capacity, he actively drives the development life cycle, includina requirements analysis, coding, design, documentation, testing, implementation, and support functions. He works with internal and external users of the software to plan new software features.



ADDRESS PO Box 242930 Little Rock, AR 72223



**PHONE** 501.604.9936



**EMAIL** mike.brower @palcofirst.com



**WEBSITE** palcofirst.com

# **EXPERIENCE**

2020-Present

Chief Information Officer • Palco

- Manage internal and external software teams in the development of highly secure, massively scalable, cloud-based case management software.
- Implement and manage the complete software development lifecycle (SDLC), from analysis and design to development and implementation.
- Design and manage all support infrastructure, including on-premises and cloudbased components.

2013-2020

Senior Project Manager/Scrum Master • SURGE FORWARD

- Managed various IT projects ranging from simple implementation to enterprise level application deployment.
- Created new Agile processes and software development department and in othe areas of the organization for better efficiency, ensure good product quality and to reduce waste.
- Managed multiple deployments for various services and ancillary applications across the organization from the IT department.

2001-2013

Manager of Software Dev. & Quality Assurance • XACTWARE

- Managed 6 development teams with 11 direct reports & 40 indirect reports.
- Developed EDI interfaces to external customers using FTP, IBM MQ Series, Oracle database objects, and C++.
- Designed and oversaw development of legacy application integration modules.

### **EDUCATION**

Brigham Young University, Provo, UT
Master's of Accountancy in Information Systems, 1995

Brigham Young University, Provo, UT Bachelor of Science in Accounting, 1995

### PROFESSIONAL LICENSURE

Certified Scrum Master (CSM) - 2013



# CAYLE COX, MBA

#### BIO

Cayle has over 15 years of leadership experience. As SVP, Cayle sets the shortterm priorities and long-term strategies for our products. Prior to joining Palco, he worked at Fiserv in various roles including Delivery Executive, Business Analyst Director, Project Manager, IT Manager, and globalization lead. Cayle is an expert in stakeholder engagement. client relations, program management, operations management, and project delivery. He has a master's in business ministration from Bellyue University, a certified Project Management Professional, and is ITIL certified. Cayle will lead the state's requirement gathering sessions. document business requirements, and coordinate development resources to ensure this project meets all defined requirements.



ADDRESS PO Box 242930 Little Rock, AR 72223



**PHONE** 501.604.9936



EMAIL cayle.cox @palcofirst.com



WEBSITE palcofirst.com

### **EXPERIENCE**

#### 2022-Present

Senior Vice President, Product Management • Palco

- Creates short-term and long-term product visions for various Palco solutions. Vision is based on anticipated market and industry trends as well as client demands.
- Creates innovated new products and solutions that are imaginative, that are bes for our clients, and ultimately further the core Palco objectives.
- Demonstrates a passion for understanding customer problems and creating innovative solutions.
- Gathers and documents product requirements from relevant parties and works with Developers to implement those requirements.
- · Sets clear product implementation direction for the implementation teams.
- Communicates clearly with internal and external users of the system, including presenting new ideas and listening to user feedback.
- · Develops project plans to release new features to market.

#### 2021-2022

Delivery Executive, Government Solutions • Fiserv

- Supported pre-sales activities. Met with clients to identify their needs and explain how Fiserv's technical solutions could address those needs.
- Represented deployment teams and post go-live support during RFP presentations.
- Provided executive oversight on active government deployments in an 8-state territory (AZ, CO, NE, MN, IA, NM, WA, and OR). Ensured project milestones were met, formed strategic relationships with client executives, and addressed escalations.
- Owned key accounts after go-live. Served as the primary point of contact for account leaders (c-suite). Answered questions, escalated issues, and continuously looked for opportunities to expand Fiserv's relationship.
- Managed Professional Services staff in New Mexico and Nebraska.
- P&L owner for professional services and Payment Solutions.

#### 2019-2021

Director of Business Analysis • Fiserv

- Founded the Delivery Quality Management Team to execute continual improvement throughout the delivery lifecycle.
- Special focus on IT development process, application testing, training, and Help Desk support.
- Led after action reviews at the conclusion of each deployment and continuously implemented improvement opportunities.



- Performed functional tests on all UAT deployments prior to client engagement.
   Served as primary point of contact for clients during UAT.
- Lead the Business Analyst team by serving as a subject matter expert while simultaneously managing multiple AuthentiCare projects.
- BA functions included collecting requirements, creating business requirement documents, training new users, executing test scripts, overseeing UAT cycles, and promoting projects into production.
- Administrative functions included estimating new projects, managing project resources, and serving as a liaison to Development and Product Management Teams.
- Served as Account Manager for New Mexico and Oklahoma after each state requested assistance.

#### 2018-2019

#### Senior Vice President of Product Management • Fiserv

- Product owner for several case management tools which process over 70 million cases per year. Systems include the Fraud Detection Work Center, the Predictive Dialer, and the Lost/Stolen GUI.
- Principal case management point of contact for client escalations, RFPs, and system outages.

#### **EDUCATION**

Bellvue University

Master of Business Administration

University of Nebraska, Lincoln, NE Bachelor of Science in Telecommunications Management, 2002

#### PROFESSIONAL LICENSURE

- · Certified Project Management Professional
- ITIL Certified