



Improving lives THROUGH
supports and services
THAT FOSTER self-determination.



Assuring Quality Lives for Everyone

Moving from the
Why to the **How**

Conflict of Interest and Case Management: State Experiences in System Redesign

Moving Toward Conflict-Free

Missouri had to assure conflict-free case management in waiver renewals that took effect on July 1, 2016.

This is eliminating choice

The state said we could do both.

Could we be in conflict if it is only for a short duration.

Individuals we serve do not feel conflicted. No one can do it better.

Too rural to be conflict-free, no other providers will move to my county.

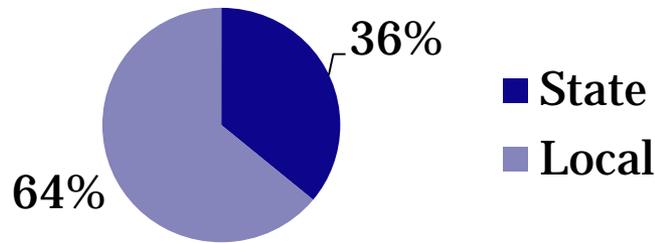
Becoming conflict-free will cost more money.



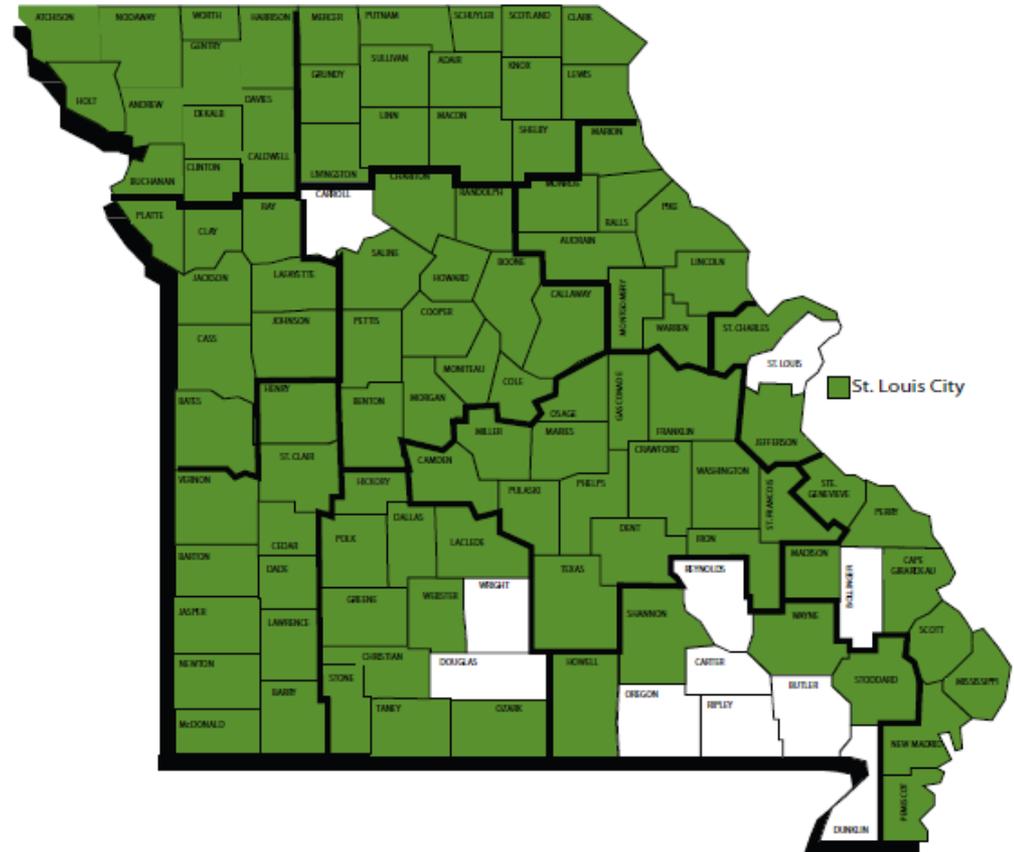
Scope of the Conflict - Perspective

Prior to formal Waiver public comment, Missouri met with stakeholders to develop Waiver language.

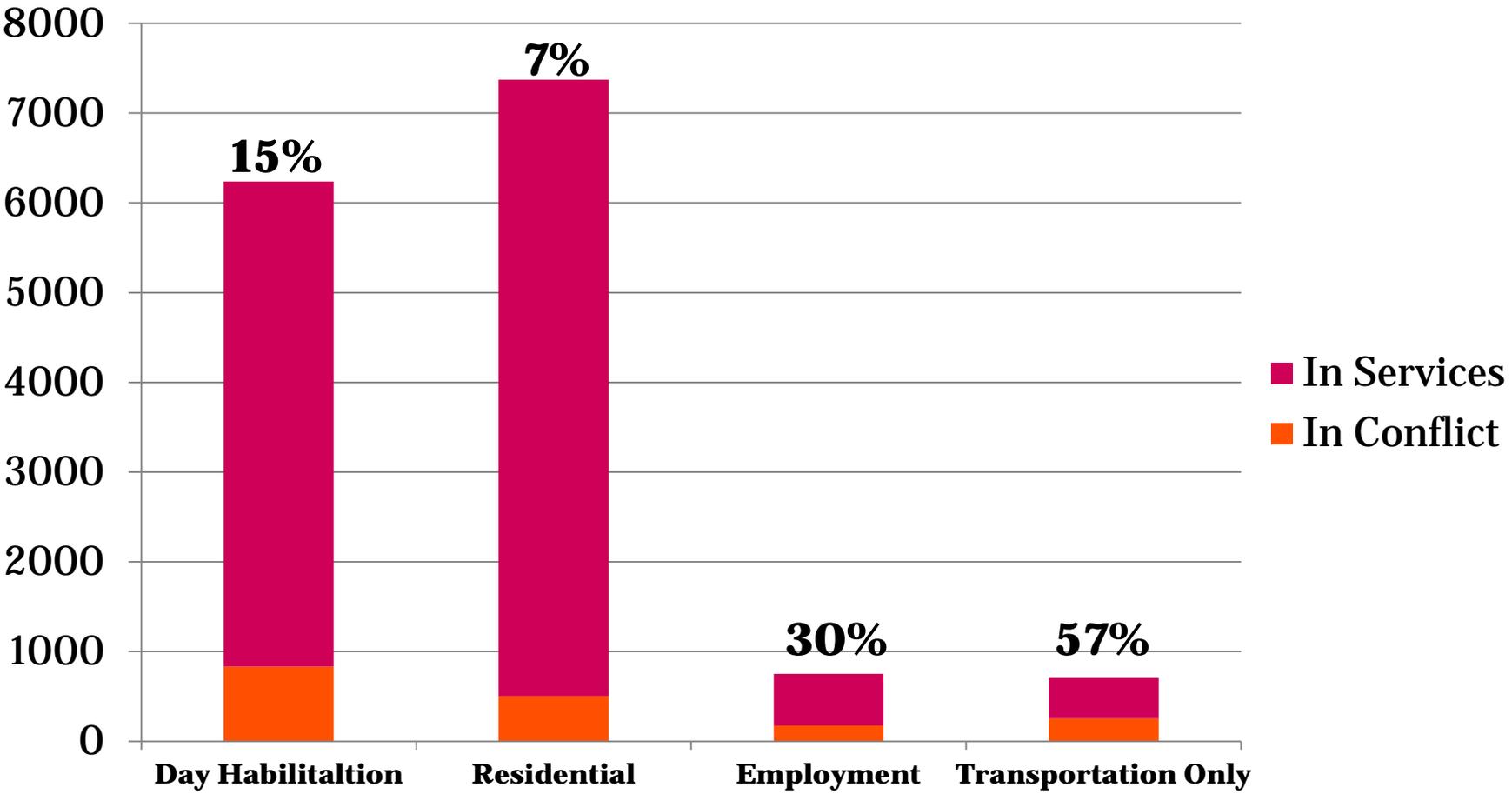
Case Mgmt



- Early survey suggested less than 1,900 or about 7% of individuals were in a conflicted service arrangement.
- While scope was small, impact still for individuals, employees and families.



Perspective – Service Delivery



***Not unduplicated, some individuals are receiving more than one service**

Moving from the Why to the How

New Waiver Language



- Targeted Case Management (TCM) will ensure choice without undue influence from providers or other parties.
- TCM entity may provide Waiver services, but **NOT** to an individual for whom the agency provides support coordination. System changes are in transition and the State will complete the system changes by December 31, 2018, in accordance with the timeline separately submitted to CMS. (See next slide)
- Continue TCM monitoring to ensure compliance and address when we find someone out of compliance.
- What we tried but did not make it....

Waiver Final Conflict-Free Timeline



- 👤 **Spring/Summer 2016 – Determine potential conflicts of interest**
 - 👤 Survey providers
 - 👤 Request written plan if currently in conflict
 - 👤 Identify if provider will still be in conflict on July 1, 2017
- 👤 **Summer/Fall 2016 – Conflicted TCM entity determine line of business, if exiting conflict.**
- 👤 **Winter 2016/Spring 2017 – Ensure availability of qualified TCM providers if current TCM entity remains service provider.**
- 👤 **July 1, 2017 through December 2018 – transition individuals in conflicted arrangements to new case management entity.**

Waiver Final Conflict-Free Timeline CMS Q& A

Overall comments

-  Prefer remediation process be completed by December 31, 2017 vs December 31, 2018.
-  Want the timeline to include more milestones.
 -  Adding some dates for completion of monitoring activities.
-  Want the timeline to include more concrete activities.
 -  Defining how reviews will be completed.

Also, wanted

-  Missouri to clarify that we were not making providers select to provide either case management or waiver services.
-  Assurances that the state would not slow down new entities who would need a contract to provide services.
-  Assurances that the state will ensure access to services.

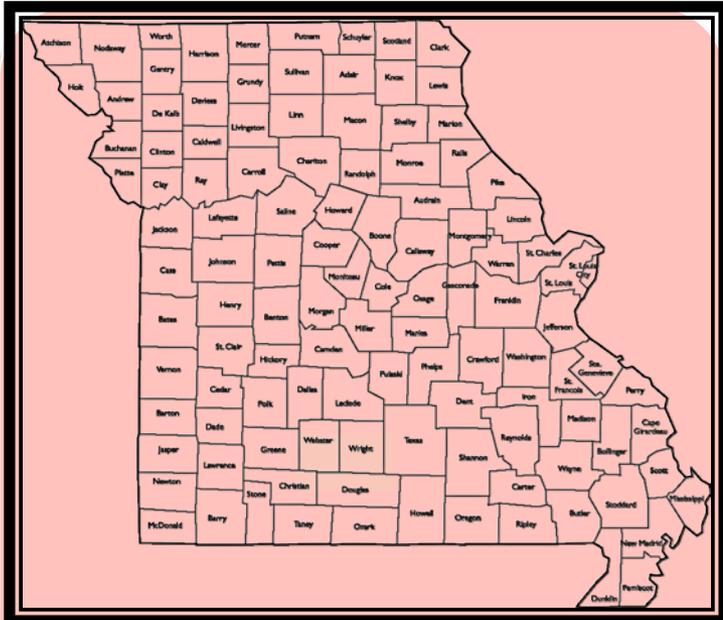
Moving from the Why to the How

What Missouri is Seeing in Plans



- 👤 Agencies are separating
 - 👤 Creating new non-profit provider agencies or finding other agencies to deliver the conflicted services
 - 👤 Completely separate entities
 - 🏠 No shared staff
 - 🏠 No shared board members
 - 🏠 Possibly contract for
 - 🌿 Shared space
 - 🌿 Shared administrative staff
- 👤 Agencies are discontinuing billing the Waiver for services
 - 👤 Transportation
 - 👤 Employment
- 👤 Agencies are doing both but not for the same person
 - 👤 Individual decides, services or case management
 - 👤 If individual chooses services, State will reassign to a different TCM provider
 - 👤 No statewide TCM providers, so must consider how to assign individuals

Implementing at a Local Level



Missouri's Population is 6.1 million

- Missouri provides TCM to 35,000 individuals
- Missouri provides Waiver services to 14,000 individuals
- About 50% of TCM entities have some level of conflict.

Washington County 25,077 residents

- Provides TCM to 172 individuals in Washington County, 260 individuals in three counties.
- Provided Waiver services to 67 individuals
- Total individuals accessing Waiver services - 84

What does this mean for me? (Family/Individual)



- 👤 Your ability to request and receive services will not change.
- 👤 You will continue to have a local advocate (support coordinator) to assist you in requesting needed services from the county board as well as the State of Missouri.
- 👤 In some agencies, this may mean a change in Support Coordinator.
- 👤 We are working to ensure continuity of service during this transition.
- 👤 For some individuals, a change in service provider may be necessary.

What does this mean for me? (Employee of a conflicted TCM)



- 🕒 Though no jobs will be lost, some positions or duties may need to be adapted.
- 🕒 There will be new opportunities for career advancement.
- 🕒 You may work with new service providers as a result of these changes and/or provider growth which will be a likely result of this transition.
- 🕒 For Washington County, it was about perception and doing what we believed to be the right thing for the individuals we serve.
- 🕒 Before January 1, we had shared employees and shared space between the not-for-profit and county board. Now we have no shared employees, board, or space.