

## Appendix I: Financial Accountability

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### I-1: Financial Integrity and Accountability

**Financial Integrity.** Describe the methods that are employed to ensure the integrity of payments that have been made for waiver services, including: (a) requirements concerning the independent audit of provider agencies; (b) the financial audit program that the state conducts to ensure the integrity of provider billings for Medicaid payment of waiver services, including the methods, scope and frequency of audits; and, (c) the agency (or agencies) responsible for conducting the financial audit program. State laws, regulations, and policies referenced in the description are available to CMS upon request through the Medicaid agency or the operating agency (if applicable).

This section applies to all AIDS/HIV Waiver services, including CDAC and Personal Care services provided through the Consumer Choices Option (CCO) the state's self-direction program. CDAC and Personal Care services are not treated differently from other waiver services.

Iowa Medicaid enters into and establishes a contract with each MCO prior to assigning members to be managed by the MCO. The contract is a comprehensive document that details the requirements of the MCO in managing the Medicaid and waiver services for those members on the AIDS/HIV Waiver. Iowa Medicaid sends each MCO a monthly eligibility file called the 834 file. All current information for all members with eligibility in the upcoming month including demographic information is included in this file. The 834 file is used to identify member enrollment with the MCO for authorization of the capitated payment to the MCO. The eligibility file indicates any change in eligibility status, whether from FFS to MCO, MCO to FFS or a change from one MCO to another. Iowa Medicaid also sends each MCO a Long Term Services and Supports File on a daily basis and monthly at months end which includes all current and historical information for members with HCBS Waiver or LTC eligibility in the upcoming month. The LTSS file is used to identify member enrollment in an HCBS Waiver who is assigned to the MCO for authorization of the capitated payment to the MCO.

Iowa Medicaid's Program Integrity (PI) unit conducts audits on all Medicaid Provider types including HCBS providers. Any suspected fraud is referred to the Department of Inspection and Appeals Medicaid Fraud and Control Unit (MFCU). The PI Unit vendor is contractually required to review a valid sample with a 95% confidence level with +/- 5% margin of error, based on the universe of claims to be sampled across all provider types. The Iowa Medicaid Program Integrity Unit performs a variety of claim reviews by either random sample or outlier algorithms. Reviewed cases include providers who are outliers on multiple parameters of cost, utilization, quality of care, and/or other metrics. Reviews are also based on referrals and complaints received. Reviews include review of claims data and service documentation to detect such aberrancies as up-coding, unbundling, and billing for services not rendered. This monitoring may involve desk reviews or provider on-site reviews. Documentation may differ depending on the service type; however, the review process would be the same.

The determination to go on-site would be made on a case-by-case basis, by the entity that would best address the issues identified.

- Audits & Investigations requests records to review claims for appropriate billing and payment. If it is found a provider has a pattern of non-responsiveness to requests for records, or has not complied with prior education, an onsite audit could be considered. However, to date, PI Audits & Investigations has not determined an on-site review regarding the waiver performance measures for FFS claims was warranted, and reviews have been able to be completed with desk audits.
- If a review identifies potential fraud concerns, a referral would be made to the MFCU, and PI Audits & Investigations would take no actions until the MFCU declined the referral or the MFCU gave the go-ahead for internal administrative actions. The MFCU will determine if an onsite investigation is necessary.
- If there were potential patient harm issues identified during the financial accountability review, a referral would be made to the State QIO, who will determine if an onsite audit is necessary.

During a desk review the provider is required to submit records for review. The PI vendor must initiate appropriate action to recover improper payments on the basis of its reviews. They must work with the Core MMIS contractor to accomplish required actions on providers, including requests to recover payment through the use of credit and adjustment procedures.

Data is collected, aggregated, and analyzed quarterly. The PI vendor must report findings from all reviews to HHS, including monthly and quarterly written reports detailing information on provider review activity, findings and recoveries. Requests for provider records by the PI unit include a documentation checklist, listing the specific records that must be provided for the audit or review pursuant to Iowa Administrative Code to document the basis for services or activities provided. Reviews are conducted in accordance with Iowa Administrative Code.

The vast majority of HCBS claims are paid through MCOs. Iowa Medicaid's Program Integrity unit only reviews claims submitted through the Fee-For-Service (FFS) system for members who are not enrolled in an MCO. The PI Unit uses targeted strategies to identify providers for review, such as using data analysis and algorithms to identify billing aberrancies, as well as referrals and complaints that come from various sources. The PI vendor may conduct on-site reviews, but there is no requirement for a set percentage of reviews to be conducted on-site.

Should the State require a provider to perform a self-review, the prescribed methodology for review is determined on a case-by-case basis, and is generally determined based on the nature and scope of the issue identified. In previous years, all HCBS claims were paid through the FFS system; currently the vast majority of HCBS claims are paid by MCOs. The state compares the results of the MCO program integrity efforts to the results achieved in past years. However, MCO operations

tend to rely more on prior authorization of services and pre-payment claims editing to control costs, and as such this type of comparison will not be straightforward and may not provide useful information.

When the PI vendor identifies an overpayment for FFS claims, a Preliminary Report of Tentative Overpayment (PROTO) letter is sent to the provider. The PROTO letter gives the provider an opportunity to ask for a re-evaluation and they may submit additional documentation at that time. After the re-evaluation is complete, the provider is sent a Findings and Order for Repayment (FOR) letter to notify them of any resulting overpayment. Both the PROTO letter and the FOR letter are reviewed and signed off by state PI staff prior to mailing. The FOR letter also includes appeal rights to inform the provider that they may appeal through the State Fair Hearing process. When overpayments are recovered, claims adjustments are performed which automatically results in the FFP being returned to CMS.

The OHCDs Medicaid audit is subject to the same standards and processes as outlined for FFS. The state's contracted MCOs are also responsible for safeguarding against, and investigating reports of, suspected fraud and abuse. MCOs are required to fully cooperate with the HHS PI Unit by providing data and ongoing communication and collaboration. Per 42 CFR 438.608 and 42 CFR Part 455, MCOs must have an administrative procedure that includes a mandatory compliance plan that describes in detail the manner in which it will detect fraud and abuse. The PI Plan must be updated annually and submitted to HHS for review and approval. The MCOs are also required to make referral to Iowa Medicaid and the MFCU for any suspected fraudulent activity by a provider. On a monthly basis, the MCO must submit an activity report to HHS, which outlines the MCO's PI-related activities and findings, progress in meeting goals and objectives, and recoupment totals. Each MCO is also required to meet in person with the Iowa Medicaid PI Unit, the Iowa Medicaid Managed Care Oversight Bureau, and the MFCU on at least a quarterly basis to coordinate on open cases and review the MCO's program integrity efforts. Iowa's MCOs continuously conduct reviews/audits on providers in their networks. The degree to which these include HCBS providers varies over time depending on tips received and leads from data analytics.

As part of the EQR process, the contractor performs onsite reviews of the MCOs that include processes that impact AIDS/HIV Waiver providers and members. Reviews include credentialing files, critical processes such as service authorization validation, claims processing, training and care coordination.

The State reviews monthly, quarterly, annual reports and compliance plans to provide oversight on the MCO programs. Each MCO has meetings monthly with the State and the Medicaid Fraud Control Unit (MFCU) to review fraud waste and abuse referral information and provide any updates regarding open investigations. Monthly fraud waste and abuse referrals, audits/investigations, closed cases, overpayment letters, overpayments collected, among other numerical values are tracked and trended with the previous year's data on a dashboard updated monthly. There will be on-site audits beginning in SFY20 for MCO oversight to validate correct reporting. These types of audits will be on a regular basis. The State will begin a program integrity review of MCO claims to ensure providers are billing and rendering services appropriately. The State will notify the MCOs of any review findings for them to pursue further program integrity activities with the provider. MCOs must also coordinate all PI efforts with Iowa Medicaid and Iowa's MFCU. MCOs must have in place a method to verify whether services reimbursed were actually furnished to members as billed by providers and must comply with 42 CFR Part 455 by suspending payments to a provider after HHS determines there is a credible allegation of fraud for which an investigation is pending under the Medicaid program against an individual/entity unless otherwise directed by HHS or law enforcement. MCOs shall comply with all requirements for provider disenrollment and termination as required by 42 CFR §455.

The Auditor of the State has the responsibility to conduct periodic independent audit of the waiver under the provisions of the Single Audit Act. All HCBS cost reports will be subject to desk review audit and, if necessary, a field audit. However, the Waiver does not require the providers to secure an independent audit of their financial statements.

Iowa requires that Managed Care Organizations have EVV information for all required PCS. Iowa reviews aggregate EVV compliance reports to understand utilization trends and EVV compliance. Home Health service codes that Iowa plans to require for EVV implementation are:

S5125 - Attendant Care Services, Per 15 Minutes, And T1019 - Personal Care Services, Per 15 Minutes.

S5130- Homemaker 15 Minutes

T1021-Home Health Aide/Certified Nurse Asst Per Visit

T1030-Nursing Care the Home Registered Nurse Per Diem, and

T1031 Nursing Care In the Home By LPN Per Diem.

The EVV system assists the managed care plans in validating the provision of services and monitoring the accuracy of payments for waiver services to providers.

The State Currently does not require EVV for FFS. We accept and calculate the FMAP reduction. The State will reassess FFS EVV implementation after home health EVV implementation under the managed care plans.

## Appendix I: Financial Accountability

### Quality Improvement: Financial Accountability

As a distinct component of the state's quality improvement strategy, provide information in the following fields to detail the state's methods for discovery and remediation.

**a. Methods for Discovery: Financial Accountability Assurance:**

*The state must demonstrate that it has designed and implemented an adequate system for ensuring financial accountability of the waiver program.*

**i. Sub-Assurances:**

**a. Sub-assurance:** *The state provides evidence that claims are coded and paid for in accordance with the reimbursement methodology specified in the approved waiver and only for services rendered.*

**Performance Measures**

*For each performance measure the state will use to assess compliance with the statutory assurance (or sub-assurance), complete the following. Where possible, include numerator/denominator.*

*For each performance measure, provide information on the aggregated data that will enable the state to analyze and assess progress toward the performance measure. In this section provide information on the method by which each source of data is analyzed statistically/deductively or inductively, how themes are identified or conclusions drawn, and how recommendations are formulated, where appropriate.*

**Performance Measure:**

**FA-a3: Number and percent of claims that are reimbursed according to the Iowa Administrative Code approved rate methodology for waiver services provided.**

**Numerator: Number of claims that are reimbursed according to the Iowa Administrative Code approved rate methodology for waiver services provided;**

**Denominator: Number of paid claims**

**Data Source (Select one):**

**Financial records (including expenditures)**

If 'Other' is selected, specify:

**The DW Unit query pulls paid claims data for all seven of the HCBS waivers.**

| <b>Responsible Party for data collection/generation</b><br><i>(check each that applies):</i> | <b>Frequency of data collection/generation</b><br><i>(check each that applies):</i> | <b>Sampling Approach</b><br><i>(check each that applies):</i> |
|--|---|---|
| <b>State Medicaid Agency</b>   | <b>Weekly</b>   | <b>100% Review</b>  |
| <b>Operating Agency</b>  | <b>Monthly</b>  | <b>Less than 100% Review</b>                                  |
| <b>Sub-State Entity</b>  | <b>Quarterly</b>  | <b>Representative Sample</b><br>Confidence Interval =         |

|   |  |  |
|---|--|--|
|   |  | <input type="text"/>   |
| <b>Other</b><br>Specify:<br><br><input type="text" value="Contracted"/> | <b>Annually</b>                                      | <b>Stratified</b><br>Describe Group:<br><br><input type="text"/> |
|   | <b>Continuously and Ongoing</b>                      | <b>Other</b><br>Specify:<br><br><input type="text"/>             |
|   | <b>Other</b><br>Specify:<br><br><input type="text"/> |  |

**Data Aggregation and Analysis:**

| Responsible Party for data aggregation and analysis ( <i>check each that applies</i> ): | Frequency of data aggregation and analysis( <i>check each that applies</i> ): |
|---|---|
| State Medicaid Agency   | Weekly  |
| Operating Agency  | Monthly   |
| Sub-State Entity  | Quarterly   |
| <b>Other</b><br>Specify:<br><br><input type="text"/>                                    | <b>Annually</b>   |
|   | <b>Continuously and Ongoing</b>   |
|   | <b>Other</b><br>Specify:<br><br><input type="text"/>                          |

**Performance Measure:**

**FA-a2: Number and percent of clean claims that are paid by the managed care organizations within the timeframes specified in the contract. Numerator: Number of clean claims that are paid by the managed care organization within the timeframes**

specified in the contract; Denominator: Number of Managed Care provider claims

Data Source (Select one):

Financial records (including expenditures)

If 'Other' is selected, specify:

Claims Data Adjudicated claims summary, claims aging summary, and claims lag report.

| Responsible Party for data collection/generation (check each that applies):            | Frequency of data collection/generation (check each that applies): | Sampling Approach (check each that applies):                           |
|--|--|--|
| State Medicaid Agency  | Weekly   | 100% Review  |
| Operating Agency   | Monthly  | Less than 100% Review  |
| Sub-State Entity   | Quarterly  | Representative Sample<br>Confidence Interval =<br><input type="text"/> |
| Other<br>Specify:<br><br><input type="text" value="Contracted entity including MCOs"/> | Annually   | Stratified<br>Describe Group:<br><br><input type="text"/>              |
|  | Continuously and Ongoing   | Other<br>Specify:<br><br><input type="text"/>                          |
|  | Other<br>Specify:<br><br><input type="text"/>                      |  |

Data Aggregation and Analysis:

| Responsible Party for data aggregation and analysis (check each that applies): | Frequency of data aggregation and analysis (check each that applies): |
|--|---|
| State Medicaid Agency  | Weekly  |

|  |   |
|--|---|
| <b>Responsible Party for data aggregation and analysis</b> <i>(check each that applies):</i> | <b>Frequency of data aggregation and analysis</b> <i>(check each that applies):</i> |
| <b>Operating Agency</b>  | <b>Monthly</b>  |
| <b>Sub-State Entity</b>  | <b>Quarterly</b>  |
| <b>Other</b><br>Specify:<br><br><input type="text"/>   | <b>Annually</b>   |
|  | <b>Continuously and Ongoing</b>   |
|  | <b>Other</b><br>Specify:<br><br><input type="text"/>                                |

**Performance Measure:**

**FA-a1: Number and percent of FFS claims paid for services provided to waiver members for which there is a corresponding prior authorization. Numerator: Number of FFS claims paid for services provided to waiver members for which there is a corresponding prior authorization; Denominator: Total number of reviewed paid claims**

**Data Source** (Select one):

**Financial records (including expenditures)**

If 'Other' is selected, specify:

**Program Integrity reviews claims and provider documentation for providers already under review.**

| <b>Responsible Party for data collection/generation</b> <i>(check each that applies):</i> | <b>Frequency of data collection/generation</b> <i>(check each that applies):</i> | <b>Sampling Approach</b> <i>(check each that applies):</i> |
|---|--|--|
| <b>State Medicaid Agency</b>  | <b>Weekly</b>  | <b>100% Review</b>   |
| <b>Operating Agency</b>   | <b>Monthly</b>   | <b>Less than 100% Review</b>                               |
| <b>Sub-State Entity</b>   | <b>Quarterly</b>   | <b>Representative Sample</b><br>Confidence Interval =      |

|   |  |   |
|---|--|---|
|   |  | <p>95% confidence level with a +/- 5% margin of error</p>   |
| <p><b>Other</b><br/>Specify:</p> <p>Contracted Entity</p> | <p><b>Annually</b></p>                   | <p><b>Stratified</b><br/>Describe Group:</p> <p>IA.0213 AIDS/HIV (.05%)<br/>IA.0242 ID (47%)<br/>IA.0299 BI (6%)<br/>IA.0345 PD (4%)<br/>IA.0819 CMH (4%)<br/>IA.4111 HD Waiver (9%)<br/>IA.4155 - Elderly Waiver (30%)</p>                 |
|   | <p><b>Continuously and Ongoing</b></p>   | <p><b>Other</b><br/>Specify:</p> <p>Reviewed monthly by pulling a sample of claims from the two most utilized codes per waiver the 1st qtr., remaining qtrs. will include claims from other codes in the waiver, ranked by utilization.</p> |
|   | <p><b>Other</b><br/>Specify:</p> <p></p> |   |



**Data Aggregation and Analysis:**

|  |   |
|--|---|
| <b>Responsible Party for data aggregation and analysis</b> ( <i>check each that applies</i> ): | <b>Frequency of data aggregation and analysis</b> ( <i>check each that applies</i> ): |
| <b>State Medicaid Agency</b>   | <b>Weekly</b>   |
| <b>Operating Agency</b>  | <b>Monthly</b>  |
| <b>Sub-State Entity</b>  | <b>Quarterly</b>  |
| <b>Other</b><br>Specify:<br><br><input type="text"/>   | <b>Annually</b>   |
|  | <b>Continuously and Ongoing</b>   |
|  | <b>Other</b><br>Specify:<br><br><input type="text"/>                                  |

**b. Sub-assurance:** *The state provides evidence that rates remain consistent with the approved rate methodology throughout the five year waiver cycle.*

**Performance Measures**

*For each performance measure the state will use to assess compliance with the statutory assurance (or sub-assurance), complete the following. Where possible, include numerator/denominator.*

*For each performance measure, provide information on the aggregated data that will enable the state to analyze and assess progress toward the performance measure. In this section provide information on the method by which each source of data is analyzed statistically/deductively or inductively, how themes are identified or conclusions drawn, and how recommendations are formulated, where appropriate.*

**Performance Measure:**

**FA-b1: Number and percent of capitation payments to the MCOs that are made in accordance with the CMS approved actuarially sound rate methodology. Numerator: # of capitation payments to the MCOs that are made in accordance with the CMS approved actuarially sound rate methodology; Denominator: # of capitation payments to the MCO's**

**Data Source** (Select one):

**Financial records (including expenditures)**

If 'Other' is selected, specify:

**MMIS**

|   |  |  |
|---|--|--|
| <b>Responsible Party for data collection/generation</b> | <b>Frequency of data collection/generation</b> ( <i>check each that applies</i> ): | <b>Sampling Approach</b> ( <i>check each that applies</i> ): |
|---|--|--|

|  |  |   |
|--|--|---|
| <i>(check each that applies):</i>  |  |   |
| <b>State Medicaid Agency</b>   | <b>Weekly</b>                                    | <b>100% Review</b>  |
| <b>Operating Agency</b>  | <b>Monthly</b>                                   | <b>Less than 100% Review</b>  |
| <b>Sub-State Entity</b>  | <b>Quarterly</b>                                 | <b>Representative Sample</b><br>Confidence Interval =<br><input type="text"/> |
| <b>Other</b><br>Specify:<br><input type="text" value="Contracted entity"/> | <b>Annually</b>                                  | <b>Stratified</b><br>Describe Group:<br><input type="text"/>                  |
|  | <b>Continuously and Ongoing</b>                  | <b>Other</b><br>Specify:<br><input type="text"/>                              |
|  | <b>Other</b><br>Specify:<br><input type="text"/> |   |

**Data Aggregation and Analysis:**

|  |   |
|--|---|
| <b>Responsible Party for data aggregation and analysis</b> <i>(check each that applies):</i> | <b>Frequency of data aggregation and analysis</b> <i>(check each that applies):</i> |
| <b>State Medicaid Agency</b>   | <b>Weekly</b>   |
| <b>Operating Agency</b>  | <b>Monthly</b>  |
| <b>Sub-State Entity</b>  | <b>Quarterly</b>  |
| <b>Other</b><br>Specify:<br><input type="text"/>   | <b>Annually</b>   |

|  |   |
|--|---|
| <b>Responsible Party for data aggregation and analysis</b> ( <i>check each that applies</i> ): | <b>Frequency of data aggregation and analysis</b> ( <i>check each that applies</i> ): |
|  | <b>Continuously and Ongoing</b>   |
|  | <b>Other</b><br>Specify:<br><br><input type="text"/>                                  |

ii. If applicable, in the textbox below provide any necessary additional information on the strategies employed by the state to discover/identify problems/issues within the waiver program, including frequency and parties responsible.

The Program Integrity unit samples provider claims each quarter for quality. These claims are cross-walked with service documentation to determine the percentage of error associated with coding and documentation. This data is reported on a quarterly basis.

MCO claims data is compared to the contractual obligations for MCO timeliness of clean claim payments. Data is provided to the HCBS staff as well as to the Bureau of Managed Care.

MCO contractual definition of a clean claim: A claim that has no defect or impropriety (including any lack of required substantiating Documentation) or particular circumstance requiring special treatment that prevents timely payment of the claim. It does not include a claim from a provider who is under investigation for fraud or abuse or a claim under review for medical necessity.

**b. Methods for Remediation/Fixing Individual Problems**

i. Describe the state's method for addressing individual problems as they are discovered. Include information regarding responsible parties and GENERAL methods for problem correction and the state's method for analyzing information from individual problems, identifying systemic deficiencies, and implementing remediation actions. In addition, provide information on the methods used by the state to document these items.

When the Program Integrity unit discovers situations where providers are missing documentation to support billing or coded incorrectly, monies are recouped and technical assistance is given to prevent future occurrence. When the lack of supporting documentation and incorrect coding appears to be pervasive, the Program Integrity Unit may review additional claims, suspend the provider payments; require screening of all claims, referral to MFCU, or provider suspension.

The data gathered from this process is stored in the Program Integrity tracking system and reported to the state on a quarterly basis.

If during the review of capitation payments Iowa Medicaid determines that a capitation was made in error, that claim is adjusted to create a corrected payment.

**ii. Remediation Data Aggregation**

**Remediation-related Data Aggregation and Analysis (including trend identification)**

| <b>Responsible Party</b> ( <i>check each that applies</i> ): | <b>Frequency of data aggregation and analysis</b> ( <i>check each that applies</i> ): |
|--|---|
| <b>State Medicaid Agency</b>                                 | <b>Weekly</b>   |
| <b>Operating Agency</b>                                      | <b>Monthly</b>  |
| <b>Sub-State Entity</b>                                      | <b>Quarterly</b>  |

| Responsible Party <i>(check each that applies):</i>   | Frequency of data aggregation and analysis <i>(check each that applies):</i>   |
|---|--|
| <p><b>Other</b><br/>Specify:</p> <div data-bbox="317 331 794 416" style="border: 1px solid black; height: 38px; width: 299px;"></div> | <p><b>Annually</b></p>   |
|   | <p><b>Continuously and Ongoing</b></p>   |
|   | <p><b>Other</b><br/>Specify:</p> <div data-bbox="863 618 1340 703" style="border: 1px solid black; height: 38px; width: 299px;"></div> |

**c. Timelines**

When the state does not have all elements of the quality improvement strategy in place, provide timelines to design methods for discovery and remediation related to the assurance of Financial Accountability that are currently non-operational.

**No**

**Yes**

Please provide a detailed strategy for assuring Financial Accountability, the specific timeline for implementing identified strategies, and the parties responsible for its operation.

**Appendix I: Financial Accountability**

**I-2: Rates, Billing and Claims (1 of 3)**

**a. Rate Determination Methods.** In two pages or less, describe the methods that are employed to establish provider payment rates for waiver services and the entity or entities that are responsible for rate determination. Indicate any opportunity for public comment in the process. If different methods are employed for various types of services, the description may group services for which the same method is employed. State laws, regulations, and policies referenced in the description are available upon request to CMS through the Medicaid agency or the operating agency (if applicable).

441 Iowa Administrative Code (IAC) 79.1 sets forth the principles governing reimbursement of providers of medical and health services. Specifically, the basis of payment for services rendered by providers of services participating in the medical assistance program is either a system based on the provider's allowable costs of operation or a fee schedule.

Providers of service must accept reimbursement based upon the department's methodology without making any additional charge to the member. Reimbursement types are described at 441 IAC 79.1(1), located here:

<https://www.legis.iowa.gov/docs/iac/chapter/10-23-2019.441.79.pdf>. Fee schedule rates and upper rate limits are located at 441 IAC Chapter 79 and can be found online at: <https://www.legis.iowa.gov/docs/iac/chapter/04-06-2022.441.79.pdf> and specific fee schedules are located on Iowa Medicaid's Fee Schedule webpage:

<https://hhs.iowa.gov/ime/providers/csrf/fee-schedule>

The following are reimbursed by fee schedules: (1) Counseling (2) personal emergency response or portable locator system; (3) nursing (4) homemaker; (5) adult day health; (6) home delivered meals; (7) respite (unless detailed otherwise below);

-Home Health Aide, Nursing Services, and Respite provided by home health agencies are based on a Medicare Low Utilization Payment Adjustment (LUPA) rates with state geographic wage adjustments less a budget-neutrality factor maintain Medical Assistance expenditures within the amounts appropriated by the Iowa General Assembly.

- Consumer directed attendant care services are reimbursed based on the agreement of the member and the provider.

- The upper rate limit for transportation is the median nonemergency medical transportation contract rate paid per mile or per trip within the member's HHS region.

For services that the member self-directs (i.e. self-directed personal care, individual directed goods and services, and self-directed community support and employment) the member negotiates a rate for the entity providing services, goods, and supports.

The rate setting process is detailed in Appendix E-1-a.

The Independent Support Broker is reimbursed at a rate negotiated between the member and the ISB not to exceed the upper rate limit in rule. The Financial Management Service (FMS) is reimbursed based on fee schedule rate not to exceed the upper rate limit allowed in rule.

A utilization adjustment factor is used to adjust the CCO budget to reflect statewide average cost and usage of waiver services. Annually, the Department determines the average cost for each waiver service. The average service cost is used to determine the "cap amount" of the CCO budget. The cap amount is used to ensure the member stays within the program dollar cap limits within each waiver. The department also determines the percentage of services that are used, compared to what is authorized within a waiver service plan. This percentage is applied to the cap amount to determine the CCO "budget amount". The budget amount is the total funds available to the member in the monthly CCO budget. This UAF includes all HCBS waiver members in the calculation, not just individuals participating in CCO.

The member may choose to set aside a certain amount of the budget each month to save towards purchasing additional goods or services they cannot buy from the normal monthly budget. A savings plan must be developed by the member, and approved by HHS prior to implementation. The good or service being saved for must be an assessed need identified in the member's service plan.

441 Iowa Administrative Code 79.1 sets forth the principles governing reimbursement of providers of medical and health services. Specifically, "the basis of payment for services rendered by providers of services participating in the medical assistance program is either a system based on the provider's allowable costs of operation or a fee schedule. Generally, institutional types of providers such as hospitals and nursing facilities are reimbursed on a cost-related basis, and practitioners such as physicians, dentists, optometrists, and similar providers are reimbursed on the basis of a fee schedule. Providers of service must accept reimbursement based upon the department's methodology without making any additional charge to the member. Reimbursement types are described at 441 Iowa Administrative Code 79.1(1):

c. Fee schedules. Fees for the various procedures involved are determined by the department with advice and consultation from the appropriate professional group. The fees are intended to reflect the amount of resources (time, training, experience) involved in each procedure. Individual adjustments will be made periodically to correct any inequity or to add new procedures or eliminate or modify others. If product cost is involved in addition to service, reimbursement is based either on a fixed fee, wholesale cost, or on actual acquisition cost of the product to the provider, or product cost is included as part of the fee schedule. Providers on fee schedules are reimbursed the lower of:

(1) The actual charge made by the provider of service.

(2) The maximum allowance under the fee schedule for the item of service in question.

Fee schedules in effect for the providers covered by fee schedules can be obtained from the department's Web site at:

<https://hhs.iowa.gov/ime/providers/csrp/fee-schedule>. All provider rates are part of Iowa Administrative Code and are subject to public comment any time there is change.

HCBS reimbursement methodologies are reviewed every five years, at a minimum. When the department reviews reimbursement levels for adequacy; historical experience, current reimbursement levels, experiences in other states, and network adequacy are considered. The results of the benchmarking indicate whether the rates are adequate to maintain an ample provider network or if legislative appropriation is necessary to increase or align rates.

Payment levels for fee schedule providers of service will be increased or decreased upon direction of the Iowa Legislature through Medicaid appropriations. There is no set cycle for the Legislature to increase or decrease HCBS provider rates.

The provider rates are established in Iowa's Administrative Rules. The legislature can direct Iowa Medicaid to increase or decrease provider rates through a legislative mandate. If so, then Iowa Medicaid changes the Iowa Administrative Rules accordingly.

All provider rates are part of Iowa Administrative Code and are subject to public comment any time there is change. Rate determination methods are set forth in Iowa Administrative Code and subject to the State's Administrative Procedures Act, which requires a minimum twenty-day public comment period. A public hearing by the state agency to take comments is not required unless at least twenty-five persons demand a hearing, though Agency's often schedule a public hearing regardless of the number of comments received. The state agency may revise a rule in response to comments received but is not required to do so. This information is on the website as well as distributed to stakeholders when there is a change. At the time of service plan development, the case managers share with the members the rates of the providers, and the member can choose a provider based on their rates. When a service is authorized in an member's comprehensive services plan, the providers of services receive a Notice of Decision (NOD), which indicates the member's name, provider's name, service to be provided, the dates of service to be provided, units of service authorized, and reimbursement rate for the service.

Iowa does allow and anticipate for variability in rates for the same waiver service provided by different providers. For those services where the rate is determined by the provider's cost report, each provider will have a unique rate based upon that provider's cost report. For services paid by a fee schedule, when a provider newly enrolls, the provider identifies their rate for services not to exceed the upper limit of that service as designated in the Iowa Administrative Code. The chosen rate must be based upon cost of service provision.

Individual service rate adjustments are made periodically to correct any rate inequity. With the AIDS/HIV waiver, this is a legislative appropriation process through provider association and individual providers lobbying efforts. A change to the rate for any service is done at the direction of the IA Legislature. When the department reviews reimbursement levels for adequacy; historical experience, current reimbursement levels, experiences in other states, and network adequacy are considered. During the past 10 years the legislature has approved a 1%, 2%, 3.55% and 4.25% across the board rate increases for HCBS waiver service providers. The most recent rate adjustment approved by the legislature occurred July 1, 2022 when all HCBS service rates were increased by 4.25%. The legislature can direct Iowa Medicaid to increase or decrease provider rates through a legislative mandate. If so, then Iowa Medicaid changes the upper rate limits in IAC accordingly. All upper rate limits are part of the IAC and are subject to public comment any time there is change. This information is on the website as well as distributed to stakeholders when there is a change. Rate determination methods are set forth in IAC and subject to the State's Administrative Procedures Act, which requires a minimum twenty-day public comment period. How the State solicits public comments on rate determination methods can be found in Main, section 6-I. A public hearing by the state agency to take comments is not required unless at least twenty-five persons demand a hearing, though Agency's often schedule a public hearing regardless of the number of comments received. The state agency may revise a rule in response to comments received but is not required to do so. At the time of service plan development, the case manager shares with the member the service reimbursement rates of the providers, and the member may choose a provider based on their rates. When a service is authorized in a member's comprehensive services plan, the providers of services receive a Notice of Decision which indicates the member's name, provider's name, service to Managed Care was implemented in April 2016. MCO capitation rate development methodologies are described in the §1915(b) waiver and associated materials. MCO rates are blended between fee-for-service and managed care capitated payments based on the anticipated percentage of unduplicated participants per delivery system.

Effective November 1, 2023, Counseling may be rendered via telehealth under this waiver. When services are delivered via telehealth, reimbursement is the same as if the services were rendered in person.

- b. Flow of Billings.** Describe the flow of billings for waiver services, specifying whether provider billings flow directly from providers to the state's claims payment system or whether billings are routed through other intermediary entities. If billings flow through other intermediary entities, specify the entities:

For fee-for-service members, providers shall submit claims on a monthly basis for waiver services provided to each member served by the provider agency. Providers submit electronic claim forms. Electronic claims must utilize a HIPAA compliant software and shall be processed by the Iowa Medicaid Provider Services Unit.

The FMS is responsible to process and pay invoices for approved goods and services included in the CCO member's written individual budgets, maintain documentation and monitor that payments are reflected in the consumer's written individual budget. All support employees that a CCO member hires must complete timecards and submit them to the FMS in order to be paid for services. All other goods and services purchased that are listed in the member's CCO budget must be submitted to the FMS with a receipt or invoice in order for payment to be made.

Providers shall submit a claim form that accurately reflects the following: (1) the provider's approved NPI provider number; (2) the appropriate waiver service procedure code(s) and modifier(s) that corresponds to the waiver services authorized in the IoWANS service plan; and (3) the appropriate waiver service unit(s) and fee that corresponds to the IoWANS service plan. The member's name and state Medicaid identification number is required on all claim forms. Iowa Medicaid issues FFS provider payments weekly on each Monday of the month. The MMIS system edits ensure that payment will not be made for services that are not included in an approved IoWANS service plan. Any change to IoWANS data generates a new authorization milestone for the case manager or health home care coordinator. The IoWANS process culminates in a final IoWANS milestone that verifies an approved service plan has been entered into IoWANS. IoWANS data is updated daily into MMIS.

For MCO members, providers bill the managed care entity with whom a member is enrolled in accordance with the terms of the provider's contract with the MCO. Providers may not bill Medicaid directly for services provided to MCO members. Managed care adjudicated waiver claims that providers bill on the CMS 1500 claim form (and waiver transportation claims) are transmitted in the encounter data submission process to Iowa Medicaid by electronic submission using the HIPAA 837 professional transaction. Managed care adjudicated waiver claims that providers bill on the UB04 claim form are transmitted in the encounter data submission process to Iowa Medicaid by electronic submission using the HIPAA 837 institutional transaction. These 837 transactions are submitted by the managed care plans to the EDISS system. EDISS processing of the managed care encounter data submissions generate an acknowledgement/response that reports to the managed care plan, the encounter submissions that were accepted or rejected. EDISS then transmits accepted encounter submissions to the Iowa Medicaid MMIS system. Finally, the Iowa Medicaid MMIS system performs additional edits of the encounter claims, and generates a response file for all transactions processed, that identifies for the managed care plan, the encounter transactions that were accepted and rejected.

## Appendix I: Financial Accountability

### I-2: Rates, Billing and Claims (2 of 3)

- c. Certifying Public Expenditures** (*select one*):

**No. state or local government agencies do not certify expenditures for waiver services.**

**Yes. state or local government agencies directly expend funds for part or all of the cost of waiver services and certify their state government expenditures (CPE) in lieu of billing that amount to Medicaid.**

*Select at least one:*

**Certified Public Expenditures (CPE) of State Public Agencies.**

Specify: (a) the state government agency or agencies that certify public expenditures for waiver services; (b) how it is assured that the CPE is based on the total computable costs for waiver services; and, (c) how the state verifies that the certified public expenditures are eligible for Federal financial participation in accordance with 42 CFR § 433.51(b). (*Indicate source of revenue for CPEs in Item I-4-a.*)

**Certified Public Expenditures (CPE) of Local Government Agencies.**

Specify: (a) the local government agencies that incur certified public expenditures for waiver services; (b) how it is assured that the CPE is based on total computable costs for waiver services; and, (c) how the state verifies that the certified public expenditures are eligible for Federal financial participation in accordance with 42 CFR § 433.51(b). *(Indicate source of revenue for CPEs in Item I-4-b.)*

**Appendix I: Financial Accountability**

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**I-2: Rates, Billing and Claims (3 of 3)**

**d. Billing Validation Process.** Describe the process for validating provider billings to produce the claim for federal financial participation, including the mechanism(s) to assure that all claims for payment are made only: (a) when the individual was eligible for Medicaid waiver payment on the date of service; (b) when the service was included in the participant's approved service plan; and, (c) the services were provided:



The MMIS system edits to make sure that claim payments are made only when a member is eligible for waiver payments and when the services are included in the service plan. A member is eligible for a Medicaid Waiver payment on the date of service as verified in IoWANS. The billing validation method includes the date the service was provided, time of service provision, and name of actual member providing the service. Several entities monitor the validity of claim payments:

- (1) case manager, or health home coordinator ensures that the services were provided by reviewing paid claims information made available to them for each of their members through IoWANS;
- (2) the Iowa Department of Health and Human Services Bureau of Purchased Services performs financial audits of providers to ensure that the services were provided;
- (3) the IM Program Integrity Unit performs a variety of reviews by either random sample or outlier algorithms.

The MMIS system includes system edits to ensure that prior to issuing a capitation payment to an MCO the member is eligible for the waiver program and is enrolled with the MCO. MCOs must implement system edits to ensure that claim payments are made only when the member is eligible for waiver payments on the date of service. The MCOs are required to develop and maintain an electronic community-based case management system that captures and tracks service delivery against authorized services and providers. The State monitors MCO compliance and system capability through pre-implementation readiness reviews and ongoing monitoring such as a review of sampled payments to ensure that services were provided and were included in the member's approved plan of care. The MCOs are also responsible for program integrity functions with HHS review and oversight.

When inappropriate billings are discovered (i.e.: overpayments determined) the provider is notified in writing of the overpayment determination. The provider either submits a refund check to the IM or the overpayment is set as a credit balance within the MMIS. Future claim payments are then used to reduce and eliminate the credit balance.

Meanwhile, the overpayments are recorded and reported to the state data warehouse using an end-of-month A/R reporting process. Any overpayments determined during a particular month are reported for that month. Any recoveries of these overpayments are similarly recorded and reported to the state data warehouse using the same end-of-month A/R process and for the month in which the recoveries were made. The dates on which the respective overpayments occurred and the recoveries made are part of this month-end A/R reporting. Bureau of Fiscal Management staff then extracts this reporting from the data warehouse to construct the CMS-64 report, the official accounting report submitted by the Department to CMS (the state's claiming mechanism for FFP). The CMS-64 report shows CMS what Iowa's net expenditures are for the quarter and is used to determine a final claim of federal funds. The federal dollar share of any overpayments not recovered within 12 months of the payment itself must be returned to CMS and this is accomplished through the CMS-64 report as well.

#### Prevention of member coercion:

The case managers and MCO community based case managers are responsible for conducting the interdisciplinary team for each member and ensuring the unencumbered right of the member to choose the provider for each service that will meet the member's needs.

The HCBS Unit completes the CAHPS to a random sample of members (95% confidence level). A specific survey question relates to the members' ability to choose their providers. Any indication of coercion will result in follow up action by the HCBS staff.

The IM HCBS Unit observes a random sample of interdisciplinary team (IDT) meetings conducted by MCO community based case managers. This allows the HCBS Unit to note any member coercion in choice of providers. HCBS staff then requests the final service plan to ensure that the final plan does include the services, units and providers chosen by the member. Any changes and omissions require follow up by the HCBS staff for resolution by the MCO.

As described in I-1, EVV is currently only applicable to PCS delivered under managed care. The EVV system assists the managed care plans in validating the provision of services and monitoring the accuracy of payments for waiver services to providers. The EVV vendor reviews all service documentation entries prior to submitting the claims for payment to the MCOs. Iowa requires that Managed Care Organizations have EVV information for all required PCS. Iowa reviews aggregate EVV compliance reports to understand utilization trends and EVV compliance. Home Health service codes that Iowa plans to require for EVV implementation are:

S5125 - Attendant Care Services, Per 15 Minutes, And T1019 - Personal Care Services, Per 15 Minutes. S5130- Homemaker 15 Minutes, T1021-Home Health Aide/Certified Nurse Asst Per Visit, T1030-Nursing Care the Home

Registered Nurse Per Diem, and T1031 Nursing Care In the Home By LPN Per Diem. The EVV system assists the managed care plans in validating the provision of services and monitoring the accuracy of payments for waiver services to providers.

- e. Billing and Claims Record Maintenance Requirement.** Records documenting the audit trail of adjudicated claims (including supporting documentation) are maintained by the Medicaid agency, the operating agency (if applicable), and providers of waiver services for a minimum period of 3 years as required in 45 CFR § 92.42.

## Appendix I: Financial Accountability

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### I-3: Payment (1 of 7)

- a. Method of payments -- MMIS** (*select one*):

**Payments for all waiver services are made through an approved Medicaid Management Information System (MMIS).**

**Payments for some, but not all, waiver services are made through an approved MMIS.**

Specify: (a) the waiver services that are not paid through an approved MMIS; (b) the process for making such payments and the entity that processes payments; (c) and how an audit trail is maintained for all state and federal funds expended outside the MMIS; and, (d) the basis for the draw of federal funds and claiming of these expenditures on the CMS-64:

Payments for waiver services for fee-for-service enrollees are made by HHS through the MMIS. Providers shall submit a claim form that accurately reflects the following: (1) the provider's approved NPI provider number; (2) the appropriate waiver service procedure code(s) and modifier(s) that corresponds to the waiver services authorized in the IoWANS service plan; and (3) the appropriate waiver service unit(s) and fee that corresponds to the IoWANS service plan. The member's name and state Medicaid identification number is required on all claim forms.

For CCO enrollees the Financial Management Service (FMS) provider receives Medicaid funds on behalf of the member based on the member's approved monthly budget. The FMS is the employer of record and performs all of the following services:

- Receive Medicaid funds in an electronic transfer.
- Process and pay invoices for approved goods and services included in the individual budget.
- Enter the individual budget into the Web-based tracking system chosen by the department and enter expenditures as they are paid.
- Provide real-time individual budget account balances for the member, the independent support broker, and the department, available at a minimum during normal business hours (9 a.m. to 5 p.m., Monday through Friday).
- Conduct criminal background checks on potential employees pursuant to 441—Chapter 119.
- Verify for the member an employee's citizenship or alien status.
- Assist the member with fiscal and payroll-related responsibilities including, but not limited to:
  - o Verifying that hourly wages comply with federal and state labor rules.
  - o Collecting and processing timecards.
  - o Withholding, filing, and paying federal, state and local income taxes, Medicare and Social Security (FICA) taxes, and federal (FUTA) and state (SUTA) unemployment and disability insurance taxes, as applicable.
  - o Computing and processing other withholdings, as applicable.
  - o Processing all judgments, garnishments, tax levies, or other withholding on an employee's pay as may be required by federal, state, or local laws.
  - o Preparing and issuing employee payroll checks.
  - o Preparing and disbursing IRS Forms W-2 and W-3 annually.
  - o Processing federal advance earned income tax credit for eligible employees.
  - o Refunding over-collected FICA, when appropriate.
  - o Refunding over-collected FUTA, when appropriate.
- Assist the member in completing required federal, state, and local tax and insurance forms.
- Establish and manage documents and files for the member and the member's employees.
- Monitor timecards, receipts, and invoices to ensure that they are consistent with the individual budget. Keep records of all timecards and invoices for each member for a total of five years.
- Provide to the department, the independent support broker, and the member monthly and quarterly status reports that include a summary of expenditures paid and amount of budget unused.
- Establish an accessible customer service system and a method of communication for the member and the independent support broker that includes alternative communication formats.
- Establish a customer services complaint reporting system.
- Develop a policy and procedures manual that is current with state and federal regulations and update as necessary.
- Develop a business continuity plan in the case of emergencies and natural disasters.
- Provide to the department an annual independent audit of the financial management service.
- Assist in implementing the state's quality management strategy related to the financial management service."

Iowa Medicaid issues provider payments weekly on each Monday of the month. The MMIS system edits insure that payment will not be made for services that are not included in an approved IoWANS service plan. Any change to IoWANS data generates a new authorization milestone for the case manager or health home care coordinator. The IoWANS process culminates in a final IoWANS milestone that verifies an approved service plan has been entered into IoWANS. IoWANS data is updated daily into MMIS.

For payments made by Iowa Medicaid: Providers are informed about the process for billing Medicaid directly through annual provider training, Iowa Medicaid informational bulletins, and the Iowa Medicaid provider manual. When a provider has been enrolled as a Medicaid provider, Iowa Medicaid Provider Services mails the provider an enrollment packet that includes how the provider can bill Medicaid directly. The Provider billing manual is also available on the Iowa HHS website at: <http://hhs.iowa.gov/policy-manuals/medicaid-provider>.

Capitation payments to MCOs are made by the MMIS. The MMIS has recipient eligibility and MCO assignment information. When a recipient is enrolled in an MCO, this is reflected on his/her eligibility file and monthly payment flows from the MMIS to the MCO via an 837 transaction. A monthly payment to the MCO on behalf of each member for the provision of health services under the contract. Payment is made regardless of whether the member receives services during the month.

The claim details submitted for payment is reviewed and reconciled by Iowa Medicaid and supporting claim detail is maintained. Payment for these services is recorded in the state’s accounting system. The accounting records and claim detail provide the audit trail for these payments

**Payments for waiver services are not made through an approved MMIS.**

Specify: (a) the process by which payments are made and the entity that processes payments; (b) how and through which system(s) the payments are processed; (c) how an audit trail is maintained for all state and federal funds expended outside the MMIS; and, (d) the basis for the draw of federal funds and claiming of these expenditures on the CMS-64:

**Payments for waiver services are made by a managed care entity or entities. The managed care entity is paid a monthly capitated payment per eligible enrollee through an approved MMIS.**

Describe how payments are made to the managed care entity or entities:

**Appendix I: Financial Accountability**

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**I-3: Payment (2 of 7)**

**b. Direct payment.** In addition to providing that the Medicaid agency makes payments directly to providers of waiver services, payments for waiver services are made utilizing one or more of the following arrangements (*select at least one*):

**The Medicaid agency makes payments directly and does not use a fiscal agent (comprehensive or limited) or a managed care entity or entities.**

**The Medicaid agency pays providers through the same fiscal agent used for the rest of the Medicaid program.**

**The Medicaid agency pays providers of some or all waiver services through the use of a limited fiscal agent.**

Specify the limited fiscal agent, the waiver services for which the limited fiscal agent makes payment, the functions that the limited fiscal agent performs in paying waiver claims, and the methods by which the Medicaid agency oversees the operations of the limited fiscal agent:

For payments made by Iowa Medicaid:

Providers are informed about the process for billing Medicaid directly through annual provider training, Iowa Medicaid informational bulletins, and the Iowa Medicaid provider manual.

When a provider has been enrolled as a Medicaid provider, Iowa Medicaid Provider Services mails the provider an enrollment packet that includes how the provider can bill Medicaid directly. The Provider billing manual is also available on the Iowa HHS website at: <https://hhs.iowa.gov/policy-manuals>.

Iowa Medicaid identifies the Financial Management Service (FMS) provider as the limited fiscal agent. The FMS directly pays the CCO self-directed services and individual directed goods Member employees through the Consumer Choices Option (CCO) program are issued instructions on billing through the FMS as authorized on the member's monthly CCO budget. The FMS bills through the MMIS system the self-directed services and individual directed goods that have been paid by the FMS during the previous month. The FMS bills through the MMIS system in the month following the provision of self-directed services.

Payment for services by the FMS include: CDAC (unskilled), day hab, HVM, prevocational services, individual respite, SCL, SE, and transportation services.

FMS provider that will receive Medicaid funds on behalf of the member. The FMS is the employer of record and performs all of the following services:

- Receive Medicaid funds in an electronic transfer.
- Process and pay invoices for approved goods and services included in the individual budget.
- Enter the individual budget into the Web-based tracking system chosen by the department and enter expenditures as they are paid.
- Provide real-time individual budget account balances for the member, the independent support broker, and the department, available at a minimum during normal business hours (9 a.m. to 5 p.m., Monday through Friday).
- Conduct criminal background checks on potential employees pursuant to 441—Chapter 119.
- Verify for the member an employee's citizenship or alien status.
- Assist with fiscal and payroll-related responsibilities including, but not limited to:
  - Verifying that hourly wages comply with federal and state labor rules.
  - Collecting and processing timecards.
  - Withholding, filing, and paying federal, state and local income taxes, Medicare and Social Security (FICA) taxes, and federal (FUTA) and state (SUTA) unemployment and disability insurance taxes, as applicable.
  - Computing and processing other withholdings, as applicable.
  - Processing all judgments, garnishments, tax levies, or other withholding on an employee's pay as may be required by federal, state, or local laws.
  - Preparing and issuing employee payroll checks.
  - Preparing and disbursing IRS Forms W-2 and W-3 annually.
  - Processing federal advance earned income tax credit for eligible employees.
  - Refunding over-collected FICA, when appropriate.
  - Refunding over-collected FUTA, when appropriate.
- Assist the member in completing required federal, state, and local tax and insurance forms.
- Establish and manage documents and files for the member and the member's employees.
- Monitor timecards, receipts, and invoices to ensure that they are consistent with the individual budget. Keep records of all timecards and invoices for each member for a total of five years.
- Provide to the department, the independent support broker, and the member monthly and quarterly status reports that include a summary of expenditures paid and amount of budget unused.
- Establish an accessible customer service system and a method of communication for the member and the independent support broker that includes alternative communication formats.
- Establish a customer services complaint reporting system.
- Develop a policy and procedures manual that is current with state and federal regulations and update as necessary.
- Develop a business continuity plan in the case of emergencies and natural disasters.
- Provide to the department an annual independent audit of the FMS
- Assist in implementing the state's quality management strategy related to the FMS.

For payments made by the MCO:

For MCO enrollees, for the self-direction option of the waivers, payments will be made to a financial management

service, which will be designated by the state as an organized healthcare delivery system to make payments to the entities providing support and goods for members that self-direct. The financial management service must meet provider qualifications established by the state and pass a readiness review approved by the state and be enrolled as a Medicaid provider with the state. The state will also oversee the operations of the financial management service by providing periodical audits.

Iowa Medicaid exercises oversight of the fiscal agent through both the IoWANS system and through our Core Unit. The Iowa Medicaid Core unit performs a myriad of functions for Iowa Medicaid including, but not limited to, processing and paying claims, handling mail, and reporting. This unit also maintains and updates the automated eligibility reporting system known as Eligibility and Verification information System (ELVS). Iowa Medicaid has regularly scheduled meetings with Core to review the thresholds of the performance measures they are required to meet to assure quality.

**Providers are paid by a managed care entity or entities for services that are included in the state's contract with the entity.**

Specify how providers are paid for the services (if any) not included in the state's contract with managed care entities.

N/A

**Appendix I: Financial Accountability**

**I-3: Payment (3 of 7)**

**c. Supplemental or Enhanced Payments.** Section 1902(a)(30) requires that payments for services be consistent with efficiency, economy, and quality of care. Section 1903(a)(1) provides for Federal financial participation to states for expenditures for services under an approved state plan/waiver. Specify whether supplemental or enhanced payments are made. *Select one:*

**No. The state does not make supplemental or enhanced payments for waiver services.**

**Yes. The state makes supplemental or enhanced payments for waiver services.**

Describe: (a) the nature of the supplemental or enhanced payments that are made and the waiver services for which these payments are made; (b) the types of providers to which such payments are made; (c) the source of the non-Federal share of the supplemental or enhanced payment; and, (d) whether providers eligible to receive the supplemental or enhanced payment retain 100% of the total computable expenditure claimed by the state to CMS. Upon request, the state will furnish CMS with detailed information about the total amount of supplemental or enhanced payments to each provider type in the waiver.

**Appendix I: Financial Accountability**

**I-3: Payment (4 of 7)**

**d. Payments to state or Local Government Providers.** *Specify whether state or local government providers receive payment for the provision of waiver services.*

**No. State or local government providers do not receive payment for waiver services.** Do not complete Item I-3-e.

**Yes. State or local government providers receive payment for waiver services.** Complete Item I-3-e.

Specify the types of state or local government providers that receive payment for waiver services and the services that the state or local government providers furnish:

State of Iowa counties can own case management agencies, home delivered meal agencies, hospitals, regional transit agencies, and supported community living agencies which would therefore cause those counties to receive Medicaid payments for authorized services.

Case management agency: can provide case management services.

Home delivered meal agency: can provide home delivered meals.

Hospitals: can provide respite,

SCL agencies can provide CDAC

**Appendix I: Financial Accountability**

**I-3: Payment (5 of 7)**

**e. Amount of Payment to State or Local Government Providers.**

Specify whether any state or local government provider receives payments (including regular and any supplemental payments) that in the aggregate exceed its reasonable costs of providing waiver services and, if so, whether and how the state recoups the excess and returns the Federal share of the excess to CMS on the quarterly expenditure report. *Select one:*

**The amount paid to state or local government providers is the same as the amount paid to private providers of the same service.**

**The amount paid to state or local government providers differs from the amount paid to private providers of the same service. No public provider receives payments that in the aggregate exceed its reasonable costs of providing waiver services.**

**The amount paid to state or local government providers differs from the amount paid to private providers of the same service. When a state or local government provider receives payments (including regular and any supplemental payments) that in the aggregate exceed the cost of waiver services, the state recoups the excess and returns the federal share of the excess to CMS on the quarterly expenditure report.**

Describe the recoupment process:

[Empty text box for describing the recoupment process]

**Appendix I: Financial Accountability**

**I-3: Payment (6 of 7)**

**f. Provider Retention of Payments.** Section 1903(a)(1) provides that Federal matching funds are only available for expenditures made by states for services under the approved waiver. *Select one:*

**Providers receive and retain 100 percent of the amount claimed to CMS for waiver services.**

**Providers are paid by a managed care entity (or entities) that is paid a monthly capitated payment.**

Specify whether the monthly capitated payment to managed care entities is reduced or returned in part to the state.

For fee-for-service enrollees, providers receive and retain 100% of the amount claimed to CMS for waiver services.

The payment to capitated MCOs is reduced by a performance withhold amount as outlined in the contracts between HHS and the MCOs. The MCOs are eligible to receive some or all of the withheld funds based on the MCO's performance in the areas outlined in the contract between HHS and the MCOs.

**Appendix I: Financial Accountability**

**g. Additional Payment Arrangements**

**i. Voluntary Reassignment of Payments to a Governmental Agency. *Select one:***

**No. The state does not provide that providers may voluntarily reassign their right to direct payments to a governmental agency.**

**Yes. Providers may voluntarily reassign their right to direct payments to a governmental agency as provided in 42 CFR § 447.10(e).**

Specify the governmental agency (or agencies) to which reassignment may be made.

**ii. Organized Health Care Delivery System. *Select one:***

**No. The state does not employ Organized Health Care Delivery System (OHCDS) arrangements under the provisions of 42 CFR § 447.10.**

**Yes. The waiver provides for the use of Organized Health Care Delivery System arrangements under the provisions of 42 CFR § 447.10.**

Specify the following: (a) the entities that are designated as an OHCDS and how these entities qualify for designation as an OHCDS; (b) the procedures for direct provider enrollment when a provider does not voluntarily agree to contract with a designated OHCDS; (c) the method(s) for assuring that participants have free choice of qualified providers when an OHCDS arrangement is employed, including the selection of providers not affiliated with the OHCDS; (d) the method(s) for assuring that providers that furnish services under contract with an OHCDS meet applicable provider qualifications under the waiver; (e) how it is assured that OHCDS contracts with providers meet applicable requirements; and, (f) how financial accountability is assured when an OHCDS arrangement is used:



Any subcontractor who is qualified to enroll with Iowa Medicaid is encouraged to do so. No provider is denied Medicaid enrollment for those services that they are qualified to provide. Waiver providers are not required to contract with an OHCDS in order to furnish services to members.

When the case manager, health home coordinator or community-based case manager has assessed the need for any waiver service, the member is offered the full choice of available providers. The member has the right to choose from the available providers; the list of providers is available through the case manager, health home coordinator or community-based case manager, and is also available through Iowa Medicaid and MCO websites. In accordance with the Iowa Administrative Code, all subcontractors must meet the same criteria guidelines as enrolled providers and the contracting enrolled provider must confirm that all criteria is met.

The Financial Management Services entities are designated as an OHCDS as long as they meet provider qualifications as specified in C-3. Iowa Medicaid (the state Medicaid agency) executes a provider agreement with the OHCDS providers and MCOs contract with an Iowa Medicaid enrolled Financial Management Services solution. The Financial Management Services provided by the OHCDS is voluntary and an alternative billing and access is provided to both waiver members and providers. Members have free choice of providers both within the OHCDS and external to these providers. Providers may use the alternative certification and billing process developed by the Iowa Medicaid. Members are given this information during their service plan development. Providers are given this information by the OHCDS. The Designated OHCDS reviews and certifies that established provider qualifications have been met for each individual or vendor receiving Medicaid reimbursement. Annually each provider will be recertified as a qualified provider.

Employer/employee agreements and timesheets document the services provided if waiver members elect to hire and manage their own workers. The purchase of goods and services is documented through receipts and/or invoices. For each purchase for fee-for-service members, Medicaid funding from the MMIS to the provider of the service is accurately and appropriately tracked through the use of Iowa's IoWANS. Financial oversight and monitoring of the OHCDS is administered by the Iowa Medicaid through an initial readiness review to determine capacity to perform the waiver services and throughout the year using a reporting system, random case file studies and the regular Medicaid audit process. MCOs are contractually required to develop a system to track all OHCDS Financial Management Services, which is subject to HHS review and approval. Further, the MCOs maintain financial oversight and monitoring with ongoing review and authority retained by HHS.

The OHCDS Medicaid audit is subject to the same standards and processes as outlined for FFS. The state's contracted MCOs are also responsible for safeguarding against, and investigating reports of, suspected fraud and abuse. MCOs are required to fully cooperate with the HHS PI Unit by providing data and ongoing communication and collaboration. Per 42 CFR 438.608 and 42 CFR Part 455, MCOs must have an administrative procedure that includes a mandatory compliance plan that describes in detail the manner in which it will detect fraud and abuse. The PI Plan must be updated annually and submitted to HHS for review and approval. The MCOs are also required to make referral to Iowa Medicaid and the MFCU for any suspected fraudulent activity by a provider. On a monthly basis, the MCO must submit an activity report to HHS, which outlines the MCO's PI-related activities and findings, progress in meeting goals and objectives, and recoupment totals. Each MCO is also required to meet in person with the Iowa Medicaid PI Unit, the Iowa Medicaid Managed Care Oversight Bureau, and the MFCU on at least a quarterly basis to coordinate on open cases and review the MCO's program integrity efforts. Iowa's MCOs continuously conduct reviews/audits on providers in their networks. The degree to which these include HCBS providers varies over time depending on tips received and leads from data analytics.

A provider must enroll with Medicaid prior to being eligible to enroll with a managed care organization. They are not required to contract with a MCO as this is a provider/MCO contractual arrangement. However, Medicaid will notify the MCO of all providers eligible to provide services.

Each MCO has different systems that maintains authorized service plans. Many of the services are prior authorized and claims are adjudicated against the authorizations.

### iii. Contracts with MCOs, PIHPs or PAHPs.

The state does not contract with MCOs, PIHPs or PAHPs for the provision of waiver services.

The state contracts with a Managed Care Organization(s) (MCOs) and/or prepaid inpatient health plan(s) (PIHP) or prepaid ambulatory health plan(s) (PAHP) under the provisions of section 1915(a)(1) of the Act for the delivery of waiver and other services. Participants may voluntarily elect to receive waiver and other services through such MCOs or prepaid health plans. Contracts with these health plans are on file at the state Medicaid agency.

Describe: (a) the MCOs and/or health plans that furnish services under the provisions of section 1915(a)(1); (b) the geographic areas served by these plans; (c) the waiver and other services furnished by these plans; and, (d) how payments are made to the health plans.

This waiver is a part of a concurrent section 1915(b)/section 1915(c) waiver. Participants are required to obtain waiver and other services through a MCO and/or prepaid inpatient health plan (PIHP) or a prepaid ambulatory health plan (PAHP). The section 1915(b) waiver specifies the types of health plans that are used and how payments to these plans are made.

This waiver is a part of a concurrent section 1115/section 1915(c) waiver. Participants are required to obtain waiver and other services through a MCO and/or prepaid inpatient health plan (PIHP) or a prepaid ambulatory health plan (PAHP). The section 1115 waiver specifies the types of health plans that are used and how payments to these plans are made.

If the state uses more than one of the above contract authorities for the delivery of waiver services, please select this option.

In the text box below, indicate the contract authorities. In addition, if the state contracts with MCOs, PIHPs, or PAHPs under the provisions of section 1915(a)(1) of the Act to furnish waiver services: Participants may voluntarily elect to receive waiver and other services through such MCOs or prepaid health plans. Contracts with these health plans are on file at the state Medicaid agency. Describe: (a) the MCOs and/or health plans that furnish services under the provisions of section 1915(a)(1); (b) the geographic areas served by these plans; (c) the waiver and other services furnished by these plans; and, (d) how payments are made to the health plans.

## Appendix I: Financial Accountability

### I-4: Non-Federal Matching Funds (1 of 3)

a. State Level Source(s) of the Non-Federal Share of Computable Waiver Costs. Specify the state source or sources of the non-federal share of computable waiver costs. *Select at least one:*

**Appropriation of State Tax Revenues to the State Medicaid Agency**

**Appropriation of State Tax Revenues to a State Agency other than the Medicaid Agency.**

If the source of the non-federal share is appropriations to another state agency (or agencies), specify: (a) the state entity or agency receiving appropriated funds and (b) the mechanism that is used to transfer the funds to the Medicaid Agency or Fiscal Agent, such as an Intergovernmental Transfer (IGT), including any matching arrangement, and/or, indicate if the funds are directly expended by state agencies as CPEs, as indicated in Item I-2-c:

**Other State Level Source(s) of Funds.**

Specify: (a) the source and nature of funds; (b) the entity or agency that receives the funds; and, (c) the mechanism that is used to transfer the funds to the Medicaid Agency or Fiscal Agent, such as an Intergovernmental Transfer (IGT), including any matching arrangement, and/or, indicate if funds are directly expended by state agencies as CPEs, as indicated in Item I-2-c:

**Appendix I: Financial Accountability**

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**I-4: Non-Federal Matching Funds (2 of 3)**

**b. Local Government or Other Source(s) of the Non-Federal Share of Computable Waiver Costs.** Specify the source or sources of the non-federal share of computable waiver costs that are not from state sources. *Select One:*

**Not Applicable.** There are no local government level sources of funds utilized as the non-federal share.

**Applicable**

*Check each that applies:*

**Appropriation of Local Government Revenues.**

Specify: (a) the local government entity or entities that have the authority to levy taxes or other revenues; (b) the source(s) of revenue; and, (c) the mechanism that is used to transfer the funds to the Medicaid Agency or Fiscal Agent, such as an Intergovernmental Transfer (IGT), including any matching arrangement (indicate any intervening entities in the transfer process), and/or, indicate if funds are directly expended by local government agencies as CPEs, as specified in Item I-2-c:

**Other Local Government Level Source(s) of Funds.**

Specify: (a) the source of funds; (b) the local government entity or agency receiving funds; and, (c) the mechanism that is used to transfer the funds to the state Medicaid agency or fiscal agent, such as an Intergovernmental Transfer (IGT), including any matching arrangement, and/or, indicate if funds are directly expended by local government agencies as CPEs, as specified in Item I-2-c:

**Appendix I: Financial Accountability**

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**I-4: Non-Federal Matching Funds (3 of 3)**

**c. Information Concerning Certain Sources of Funds.** Indicate whether any of the funds listed in Items I-4-a or I-4-b that make up the non-federal share of computable waiver costs come from the following sources: (a) health care-related taxes or fees; (b) provider-related donations; and/or, (c) federal funds. *Select one:*

**None of the specified sources of funds contribute to the non-federal share of computable waiver costs**

**The following source(s) are used**

*Check each that applies:*

**Health care-related taxes or fees**

**Provider-related donations****Federal funds**

For each source of funds indicated above, describe the source of the funds in detail:

**Appendix I: Financial Accountability****I-5: Exclusion of Medicaid Payment for Room and Board****a. Services Furnished in Residential Settings. *Select one:***

**No services under this waiver are furnished in residential settings other than the private residence of the individual.**

**As specified in Appendix C, the state furnishes waiver services in residential settings other than the personal home of the individual.**

**b. Method for Excluding the Cost of Room and Board Furnished in Residential Settings.** The following describes the methodology that the state uses to exclude Medicaid payment for room and board in residential settings:

The only AIDS/HIV waiver service that may be provided in a residential settings outside the member's home is Respite. The provider manuals contain instructions for providers to follow when providing financial information to determine rates. It states that room and board cannot be included in the cost of providing services. Most respite payments are based upon fee schedules detailed in the Iowa Administrative Code. That fee schedule has no allowance for room and board charges.

Respite provided by a home health agency is based upon the LUPA rate as detailed in Appendix I-2a. Assisted Living facilities are authorized to provide the following services: home delivered meals and consumer-directed attendant care. The fees for these services are limited by fee schedules, which have no allowance for room and board charges. In addition, the fee charged must be substantiated by the costs to provide each specific authorized service, and not by the costs to perform all functions of the facility. Upon request from the department or designated review staff, each facility must be able to provide service cost information.

The exclusion of room and board from reimbursement is ensured by the Provider Cost Audit Unit. When providers submit cost report documentation and rate setting changes, the Provider Cost Audit Unit accounts for all line items and requests justification for all allocated costs (administrative and other). If it is determined that a provider has attempted to include room and board expenses in cost audits or rate setting documentation, the provider is instructed to make the adjustment and further investigation is conducted to determine if previous reimbursement needs to be recouped by Iowa Medicaid.

All providers of waiver services are subject to a billing audit completed by the Department of Health and Human Services Bureau of Purchased services.

Any payment from an MCO to residential settings is made explicitly for the provision of services as defined by this waiver and excludes room and board. As part of the ongoing monitoring process of MCOs, the State will ensure that payments to residential settings are based solely on service costs.

**Appendix I: Financial Accountability****I-6: Payment for Rent and Food Expenses of an Unrelated Live-In Caregiver****Reimbursement for the Rent and Food Expenses of an Unrelated Live-In Personal Caregiver. *Select one:***

**No. The state does not reimburse for the rent and food expenses of an unrelated live-in personal caregiver who resides in the same household as the participant.**

Yes. Per 42 CFR § 441.310(a)(2)(ii), the state will claim FFP for the additional costs of rent and food that can be reasonably attributed to an unrelated live-in personal caregiver who resides in the same household as the waiver participant. The state describes its coverage of live-in caregiver in Appendix C-3 and the costs attributable to rent and food for the live-in caregiver are reflected separately in the computation of factor D (cost of waiver services) in Appendix J. FFP for rent and food for a live-in caregiver will not be claimed when the participant lives in the caregiver's home or in a residence that is owned or leased by the provider of Medicaid services.

The following is an explanation of: (a) the method used to apportion the additional costs of rent and food attributable to the unrelated live-in personal caregiver that are incurred by the individual served on the waiver and (b) the method used to reimburse these costs:

**Appendix I: Financial Accountability**

**I-7: Participant Co-Payments for Waiver Services and Other Cost Sharing (1 of 5)**

**a. Co-Payment Requirements.** Specify whether the state imposes a co-payment or similar charge upon waiver participants for waiver services. These charges are calculated per service and have the effect of reducing the total computable claim for federal financial participation. *Select one:*

**No. The state does not impose a co-payment or similar charge upon participants for waiver services.**

**Yes. The state imposes a co-payment or similar charge upon participants for one or more waiver services.**

**i. Co-Pay Arrangement.**

Specify the types of co-pay arrangements that are imposed on waiver participants (*check each that applies*):

*Charges Associated with the Provision of Waiver Services (if any are checked, complete Items I-7-a-ii through I-7-a-iv):*

**Nominal deductible**

**Coinsurance**

**Co-Payment**

**Other charge**

*Specify:*

**Appendix I: Financial Accountability**

**I-7: Participant Co-Payments for Waiver Services and Other Cost Sharing (2 of 5)**

**a. Co-Payment Requirements.**

**ii. Participants Subject to Co-pay Charges for Waiver Services.**

**Answers provided in Appendix I-7-a indicate that you do not need to complete this section.**

**Appendix I: Financial Accountability**

**I-7: Participant Co-Payments for Waiver Services and Other Cost Sharing (3 of 5)**

a. Co-Payment Requirements.

iii. Amount of Co-Pay Charges for Waiver Services.

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Answers provided in Appendix I-7-a indicate that you do not need to complete this section.

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**Appendix I: Financial Accountability**

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**I-7: Participant Co-Payments for Waiver Services and Other Cost Sharing (4 of 5)**

a. Co-Payment Requirements.

iv. Cumulative Maximum Charges.

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Answers provided in Appendix I-7-a indicate that you do not need to complete this section.

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**Appendix I: Financial Accountability**

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**I-7: Participant Co-Payments for Waiver Services and Other Cost Sharing (5 of 5)**

b. **Other State Requirement for Cost Sharing.** Specify whether the state imposes a premium, enrollment fee or similar cost sharing on waiver participants. *Select one:*

**No. The state does not impose a premium, enrollment fee, or similar cost-sharing arrangement on waiver participants.**

**Yes. The state imposes a premium, enrollment fee or similar cost-sharing arrangement.**

Describe in detail the cost sharing arrangement, including: (a) the type of cost sharing (e.g., premium, enrollment fee); (b) the amount of charge and how the amount of the charge is related to total gross family income; (c) the groups of participants subject to cost-sharing and the groups who are excluded; and, (d) the mechanisms for the collection of cost-sharing and reporting the amount collected on the CMS 64: